

# Planning Statement

(including Design & Access, and Flood Risk)



1A Throwley Way, Sutton, SM1 4AF

Continued use of the premises as a place of worship (Use Class F1)

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Prepared by

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## 1. Introduction

- 1.1. This Statement is submitted to provide the background and rationale to the continued use of the premises as a place of worship under Class F1 of the Town and Country Planning (Use Classes) Order 2015 (as amended).
- 1.2. It demonstrates the applicant’s commitment to this site; it clarifies the nature of the use, it considers the relationship with the surroundings and it shows that the use is acceptable in planning terms. Planning permission can be granted.

## 2. The Site

- 2.1. The property is located on the western side of Throwley Way, to the rear of Times Square shopping mall within Sutton Town Centre.



*Figure 1 - Aerial photograph of the site  
(Google Maps)*

- 2.2. Photographs of the site and its surroundings are provided within the accompanying photographic sheet. The building that occupies the site is a 2 and 3 storey building with rendered elevations to the front parts, and brick elevations to the rear. Behind the rendered front facade there is a mansard type roof, terminating half-way along the building, where there is then a flat roof to the 2 lower floors. To the front of the building there is a single storey “vestibule” extension with predominantly glazed elevations and a monopitch tiled roof.

- 2.3. The building was formally occupied as a Snooker Hall, but more recently has been used as a place of worship under Use Class F1(f).



*Figure 2 - Front and northern elevations*

- 2.4. The building has three levels, accessed from a staircase and lift at the front of the building, through the glazed vestibule.
- 2.5. The lower ground floor extends across the whole of the site and was used by the snooker hall as a playing area, offices, plant and storage space. As a place of worship this floor has been used as the main auditorium, with ancillary book store and auditory control room.
- 2.6. The upper ground floor also extends across the whole of the building and was used by the snooker hall as a playing area to the rear with a bar and lounge area to the front. The use of the premises as a place of worship has retained the bar and lounge area as a serving counter, and the remainder of the floor has been used for informal meetings and activities outside of the main auditorium, and also for storage.
- 2.7. The staircase and lift leads up to the top floor contained within the mansard type roofspace to the front half of the building. This provided a playing area for the snooker hall with ancillary offices. As a place of worship, this floor has been used as meeting rooms, the pastor's office and caretaker's accommodation. The mansard roof form is to the front half of the building, with a rear exit door allowing access onto the flat roof above the rear 2 storey parts of the building.
- 2.8. The building occupies the whole of the site, except for a narrow surfaced forecourt to the front of the vestibule extension. Emergency egress is afforded from the lower ground floor level of the building into the rear of the Times Square Shopping Centre, and at first floor



level from the rear of the building, across the flat roof, and down an external metal stair to the adjoining ramped service access to the shopping centre.

- 2.9. The rear of the building abuts the rear of the Times Square Shopping Centre, and the northern elevation abuts the service ramp to the Centre. The southern elevation abuts the locally listed building (LL94) "Sutton Arcade", comprising 2 no. two-storey, flat roofed buildings that support a central archway through to a parking area at the rear. The buildings are in use as a tattoo studio and as a minicab office.



*Figure 3 - Sutton Arcade adjacent to the application property*

- 2.10. Opposite the application site are 7 pairs of semi-detached, two-storey houses, arranged close to the highway with small front gardens. The wider area is dominated by several tower blocks consistent with the Sutton Town Centre location. This includes "Aspects" a 15 storey residential block at No.1 Throwley Way, and Times House, a 7 storey office block at the rear of the Times Square shopping centre.
- 2.11. Throwley Way is a one-way road in a north-south direction. The pavement to the front of the property is partly used as a cycle path, and the highway also accommodates a bus lane. Double yellow lines prevent any parking within the bus lane, and a single yellow line on the opposite side of the road prevents parking at most times. Times Square Car Park is opposite and to the north of the application site. The car park is operational between 7am and 8.30pm Monday to Saturday, and between 9.30am and 6.00pm Sundays and Bank Holidays.



*Figure 4 - Throwley Way looking northwards from the application site*

- 2.12. The property is not within a Conservation Area and it is not a listed building. There are no statutorily listed buildings within the vicinity of the site, and the adjoining locally listed Sutton Arcade will not be affected by the continued use of the premises.

### 3. Relevant Planning History

- 3.1. 85/28179 - In 1985, planning permission was granted for the use of the existing building as a snooker hall.
- 3.2. B2013/67485/FUL - In 2013, planning permission was refused for the use of the premises for religious purposes falling within Use Class D1.
- 3.3. The Applicant is aware of planning enforcement investigations in August 2021 where the use of the premises as a place of worship was "largely agreed as being acceptable" and that the use would still be deemed acceptable provided that a full planning application was submitted to include details to minimise noise disturbance and parking impacts.

### 4. The Proposal

- 4.1. The application seeks planning permission to continue the use the premises as a Place of Worship (Use Class F1). The Applicant, Faith Church Ministries Ltd, are purchasing the property and will occupy the premises replacing the former occupants, Gilbert Deya Ministries.
- 4.2. Faith Church Ministries is a Pentecostal, Tamil church established in 1993, currently with 10 churches across the UK. The premises in Sutton will complement the existing churches in London located at Surbiton, Wembley and East Ham.
- 4.3. As the property has been in use as a church for many years, no external changes to the building are required and only minor refurbishment and decoration is required to the internal parts.
- 4.4. The building will be used in the same way as the former church occupiers. The lower ground floor hall will accommodate the main space for religious purposes, the upper ground floor hall will provide a meeting and recreation space, including a refreshment counter, and WC facilities. The upper floor will continue to be used as offices and meeting spaces associated with the church use and activities.
- 4.5. The proposed activities and the maximum number of attendees expected on the premises at different times of the day are indicated in the Tables below:

**Proposed Activities**

	<b>Morning (09.00 - 13.00)</b>	<b>Afternoon (13.00 - 18.00)</b>	<b>Evening (18.00 - 22.00)</b>
<b>Monday</b>	Prayer Groups, Community Meetings, Training, Youth Groups		
<b>Tuesday</b>	Prayer Groups, Community Meetings, Training, Youth Groups		
<b>Wednesday</b>	Prayer Groups, Community Meetings, Training, Youth Groups		Evening Worship
<b>Thursday</b>	Prayer Groups, Community Meetings, Training, Youth Groups		
<b>Friday</b>	Prayer Groups, Community Meetings, Training, Youth Groups		Night Worship (until midnight, once a month)
<b>Saturday</b>	Fasting Prayer		
<b>Sunday</b>	Sunday Worship		
	The use of the building for group meetings will be dependent on demand - it will not be all day, every day.		

**Maximum number of individuals on the premises at any one time**

	<b>Morning (09.00 - 13.00)</b>	<b>Mid Afternoon (13.00 -18.00)</b>	<b>Evening (18.00 +)</b>
<b>Monday</b>	25	35	60
<b>Tuesday</b>	40	40	30
<b>Wednesday</b>	25	45	70
<b>Thursday</b>	40	25	40
<b>Friday</b>	35	50	200
<b>Saturday</b>	150	40	300
<b>Sunday</b>	300	300	60

*Figure 5 - Proposed activities and potential maximum number of attendees*

4.6. The use will generate some employment opportunities with regard to the maintenance and operation of the building, for the Pastor and persons involved in the administrative tasks of

the church, and for the cleaning and maintenance of the building. Volunteer roles and employment opportunities will also be formed through the various community groups that it is hoped will use the building.

## 5. Main Planning Considerations

- 5.1. The main planning considerations are addressed below in the context of the 2021 National Planning Policy Framework (NPPF), the 2021 London Plan (LP), the 2018 London Borough of Sutton Local Plan (SLP) and the 2012 South London Waste Plan.

### The Principle of the Use as a Place of Worship

- 5.2. LP Policies GG1 and SD9 confirm the crucial role of town centres in the social, civic, cultural and economic lives of Londoners. LP Policy S1 supports the provision of social infrastructure (including places of worship), recognising the importance of community and faith groups in providing the range of services and facilities that contribute towards a good quality life.
- 5.3. SLP Policy 18 confirms that within Sutton Town Centre planning permission will be granted for development that is suitable to the scale, role, function and the character of the centre and its catchment. In the definition of "Town Centre Uses" community uses are identified as being appropriate.
- 5.4. SLP Policy 22 confirms that the Council will grant planning permission for social and community infrastructure where it is accessible by a range of sustainable transport modes, provides flexible and adaptable space, is close to or accessible to the community it is intended to serve and it would not have any adverse environmental effects. Furthermore the policy states that the Council will not grant planning permission for development that involves the loss of social and community infrastructure.
- 5.5. The property has been used as a place of worship since around 2013, and the proposal seeks to continue this use, albeit by a different faith group. The use is defined by SLP Policies 18 and 22 as being appropriate in this location, and SLP Policy 22 does not allow for the loss of such uses. The principle of the use of the premises as a place of worship is therefore acceptable.

### Community Benefits

- 5.6. Faith Church Ministries is an expanding Church with 13 branches in the UK. It currently operates with its regular church services throughout the week, in person and online. It offers senior citizen help, a youth outreach programme and acts as a counselling centre, and is very much focused on community service. It also offers regular gatherings for self-development where we train members in different areas; for leadership skills, teaching children, singing lessons, and youth band practice. The charity also consists of regular life



prayer groups as well as personal bible study groups. The charity strives towards a mission of spreading love in our community whilst serving our Lord.

- 5.7. The community benefits of the proposal are therefore significant, and in the light of the principle of the use being acceptable, the associated empowerment, health and welfare benefits to the community are also important aspects that should carry significant positive weight in the determination of this application.

### Design and Access Considerations

- 5.8. The use does not require any changes to the external appearance of the building. Its former use as a snooker hall and 10 year use as a place of worship ensures that the building already has appropriate measures in place to ensure the accessibility and safety of all users, including those with disabilities, in accordance with current legislative requirements.
- 5.9. The Applicant does intend to undertake some internal alterations, primarily related to decoration, sound and thermal insulation, and improvements to the WC's and kitchen facilities. These works do not require planning permission.
- 5.10. There are therefore no design and access issues arising from the continued use of the premises as a place of worship.

### Parking, Servicing and Highway Safety

- 5.11. NPPF Paragraph 111 states that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
- 5.12. LP Policy T1 requires development to make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes. LP Policy T2 supports development proposals that reduce the dominance of vehicles on London's streets and developments that connect to public transport and local walking and cycling networks. LP Policy T4 requires development proposals to reflect and be integrated with current and planned transport access, capacity and connectivity. LP Policy T5 encourages cycling and cycle parking provision, and LP Policy T6 imposes a restraint based approach to car parking provision.
- 5.13. SLP Policy 36 seeks to ensure that the transport impact of development minimises any adverse impact on highway network, and for new development to maximise the use of sustainable modes of transport. SLP Policy 37 and SLP Appendix 11 set out the Council's restraint-based, maximum car parking standards, and minimum cycle parking standards.
- 5.14. An indication as to the accessibility of the site to public transport is assessed by Transport for London's WebCAT (Web-based Connectivity Assessment Toolkit). This uses a "Public

Transport Accessibility Level” rating (PTAL) to measure locations by distance from frequent public transport services. A PTAL level of 1 is low and a PTAL level of 6 is high.

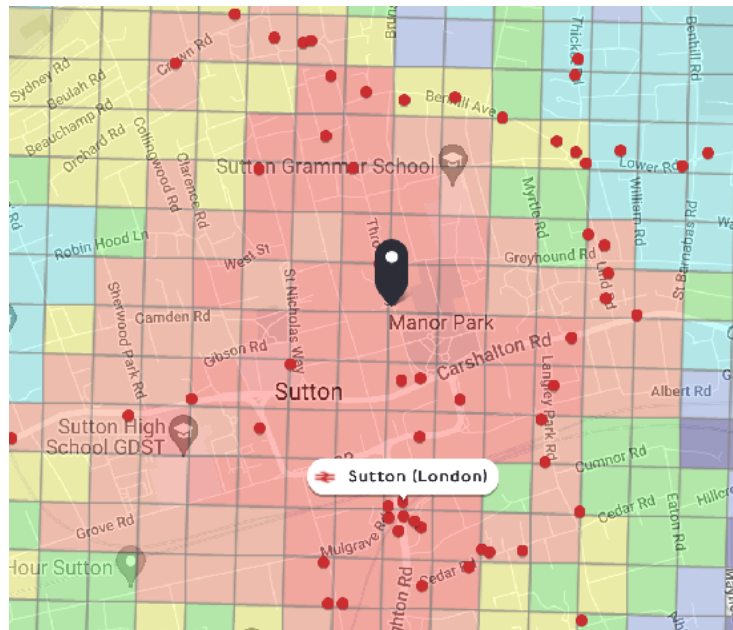


Figure 6 - PTAL Map  
(TfL WebCAT and Google).

Black marker is the site location and red dots are bus stops, red shading shows PTAL 6, orange shading PTAL 5, yellow shading PTAL 4, green shading PTAL 3, blue shading PTAL 2 etc.

- 5.15. The site has a PTAL rating of 6a, indicating excellent access to public transport in the area. This includes many bus routes that converge and depart from various places around Sutton Town Centre, and nearby Sutton rail station (within 10 minutes walking distance).
- 5.16. The site is also close to Sutton Town Centre with all its amenities. It is therefore in a highly accessible and sustainable location for all of its intended users. Its location will not require visitors to travel by car as the site is conveniently located close to public transport provision, yet it is also has the benefit of many public car parks in the area, with local on-street parking restrictions ensuring that existing businesses and residents are not prejudiced by the parking and highway demands of the town centre location.
- 5.17. The accompanying draft Travel Plan gives further encouragement to walking, cycling or using public transport, and to car share where appropriate. The Travel Plan is intended as a “live” working document to be updated on a yearly basis by an appointed Travel Co-ordinator. This can be secured by means of an appropriate condition on the planning permission.
- 5.18. The accompanying Waste Management, Storage and Collection Strategy also demonstrates how any waste generated by the occupiers will be managed and collected, in accordance with circular economy principles. There is adequate space for collection and servicing vehicles to service the premises from Throwley Way or adjoining car parks and service roads.

- 5.19. The premises can therefore be used without detriment to the highway network, or the amenities of surrounding properties. There will therefore be no adverse harm to traffic flows or parking within the vicinity of the site arising from the use.

### The Impact on Neighbouring Occupiers

- 5.20. NPPF Paragraph 185 states that new development should be appropriate for its location and take into account the likely effects of pollution on health and living conditions. SLP policies seek to protect the amenity of the occupiers of adjoining buildings, and to not result in direct overlooking of habitable rooms or private outdoor space, or result in significant loss of sunlight or daylight.
- 5.21. The Applicant is committed to maintaining a good relationship with the nearby businesses and residents, to ensure that all activities taking place within the building do not create unacceptable levels of noise or disturbance.
- 5.22. Given the previous use of the premises a snooker hall and as a place of worship, it is unlikely that the new occupants will generate any additional noise disturbance beyond that experienced from the former uses. However, it is acknowledged that mitigation measures and actions can be taken to further minimise the risk of disturbance.
- 5.23. The proposed hours of use and the maximum number of attendees are identified in the Tables above. They indicate that for the majority of times, the building will have a low level of use, so that it will not result in any noise or disturbance to the amenities of surrounding properties.
- 5.24. There will be more people on the premises on Wednesdays and Sundays when religious services take place. It is acknowledged that these larger events have the potential to cause some limited noise and disturbance for short periods of time. However, the building is already adequately insulated and designed to mitigate noise impact. Additional sound reduction measures can nevertheless be incorporated to reduce noise emissions to ensure the protection of the amenities of nearby properties. This could include measures to ensure that windows and doors are kept shut during activities that may cause unwanted noise, and/or cut-off devices to prevent amplified sound from being too excessive outside of the site boundaries. Whilst the Council may wish to impose its own conditions, some suggestions are contained within *Appendix A*.
- 5.25. Similarly, as the site is located in a commercial area there will be no disturbance arising from the parking and movement of vehicles. However, all members and visitors will be reminded to leave the premises quickly and quietly, and to respect their neighbours. They will also be encouraged to walk, use public transport, or car share so as to minimise vehicle movements and the potential for noise and disturbance.
- 5.26. Consequently, the proposal will not therefore have any adverse impact on the amenities of adjoining or nearby properties.

## Heritage Considerations

- 5.27. The adjoining "Sutton Arcade" is a locally listed building, constructed in 1926 as a shopping arcade from Throwley Way to the High Street. It was demolished in the late 1990's and all that remains now is the Throwley Way arch.
- 5.28. The continued use of the application property as a place of worship will not have any impact on the significance of this non-designated heritage asset.

## Sustainability and Energy Efficiency

- 5.29. NPPF Section 14 clarifies that the planning system should support the transition to a low carbon future. LP Chapter 9 includes policies and guidance relating to climate change and sustainable development. LP Policy SI1 relates to improving air quality, LP Policy SI2 seeks to minimise greenhouse gas emissions, LP Policy SI5 seeks to minimise water usage, and LP Policy SI7 seeks to reduce waste and support the circular economy. LP Policy SI2 seeks to ensure flood risk management and LP Policy SI13 relates to sustainable drainage. SLP Policies re-enforce the Council's similar approach to the environment and climate change.
- 5.30. The proposal retains the existing building, adapting it internally with minimal disruption to the building fabric to facilitate the proposed use. All building materials used in any internal refurbishment will nevertheless be locally sourced and tested for their robustness in providing improved thermal efficiency, sound insulation and fire resistance.

## Flood Risk and Sustainable Drainage

- 5.31. NPPF Paragraphs 155-165 refer to flood risk and the need to ensure development is not placed in areas at risk of flooding, and that new development does not increase flood risk elsewhere. LP Policy SI2 seeks to ensure flood risk management and LP Policy SI13 relates to sustainable drainage. SLP policies seek to ensure that new development reduces flood risk and minimises the impact of flooding, with SLP Policy 32 encouraging the use of sustainable urban drainage systems.
- 5.32. The site is within a Flood Zone 1<sup>1</sup> with a very low probability of flooding and a less than a 1 in 1000 annual probability of flooding occurring from the sea or any rivers. A property within a Flood Zone 1 area is considered suitable (in flood risk terms) for either residential or commercial uses.
- 5.33. Consideration has also been given to possible scenarios at this site due to rainfall and surface water flooding. However, the Environment Agency's Surface Water Flood Map (SWF) indicates that the site is at "low risk" of being affected by surface water flooding.

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<sup>1</sup> Environment Agency Flood Map for Planning 2023

5.34. Surrounding roads can be subject to some surface water flooding, but the flood depth or velocity of the water is not excessive. Any surface water flooding is likely to be short-lived given the adequate highway and natural drainage systems in the area.

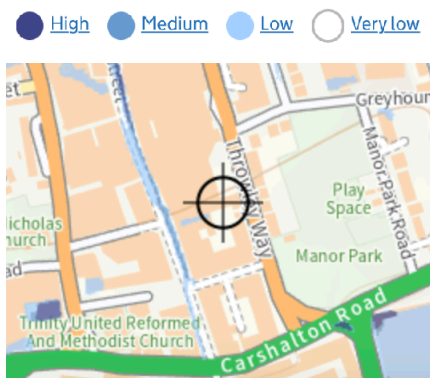


Figure 7 - Extent of flood risk from surface water  
(Environment Agency)

5.35. NPPF Guidance <sup>2</sup> confirms that minor developments are unlikely to raise significant flood risk issues unless they would:

- 💧 have an adverse effect on a watercourse, floodplain or its flood defences;
- 💧 would impede access to flood defence and management facilities; or
- 💧 where the cumulative impact of such developments would have a significant effect on local flood storage capacity or flood flows.

5.36. The proposal relates to the continued use of an existing building as a place of worship. No external works are proposed to the building to enable the continuation of the use. The proposal does not therefore raise any significant flood risk issues.

## 6. Conclusion

6.1. The Council has previously confirmed that the use of the premises as a place of worship is acceptable. The information provided within this application demonstrates that the proposed new occupants will facilitate the church in an appropriate manner that will not give rise to any noise and disturbance or adversely impact on pedestrian or highway safety, or impact on any other material planning considerations.

6.2. The town centre is the most appropriate and sustainable location for the proposed use, consistent with other town centre meeting places, uses and activities.

6.3. The Applicant is willing to accept appropriate conditions to ensure that the extent of the use remains as proposed in this application. Suggested conditions are identified in *Appendix A*.

6.4. It is therefore respectfully requested that the Council grant planning permission.

end.

<sup>2</sup> NPPF Planning Practice Guidance on Flood Risk and Coastal Change, Paragraph 047, 15/04/2015.



## APPENDIX A

### RECOMMENDED CONDITIONS ACCEPTABLE TO THE APPLICANT

1. Prior to the occupation of the premises by the Applicant, a Travel Co-ordinator will be appointed by the Applicant to ensure the implementation and monitoring of a Travel Plan. The actionable measures of the Travel Plan shall be implemented prior to the commencement of the use and shall be retained in the forms specified for so long as the use is in existence. *Reason: To promote sustainable travel choices by all users of the building.*
2. Except in the case of monthly late-night prayer meetings and nationally recognised religious festivals (the combined effect of which shall not exceed in total 15 nights in any one calendar year), all activities shall cease by 11pm on any day and the premises vacated by 11.30pm. Except in the case of emergencies no person shall be permitted to enter the site until 6am the following day. *Reason: To ensure that the amenity of adjoining occupiers is protected.*
3. No sound amplification equipment shall be used for worship services until noise limiting and cut-out devices have been fitted to the electrical supply and connected to windows and external doors. These devices should cut out the supply to amplified sound when windows and external doors are opened. Such fixtures and fittings shall be implanted and retained as such for so long as the worship services are in existence. *Reason: To ensure that the amenity of adjoining occupiers is protected.*

*end.*