

Committee	PLANNING COMMITTEE A	
Report Title	LAND ADJACENT TO 51 MARISCHAL ROAD, LONDON, SE13 5LE	
Ward	LEWISHAM CENTRAL	
Contributors	Russell Brown	
Class	PART 1	3 <sup>rd</sup> August 2017

Reg. Nos. DC/16/098512

Application dated 16.09.2016

Applicant Mr I Copping

Proposal The retrospective change of use from a workshop (Use Class B1c) to a tyre changing and selling business (Sui Generis) at land adjacent to 51 Marischal Road, SE13.

Applicant's Plan Nos. Statement Regarding the Previous Usage of the Yard before Top Shop Tyres; Delivery & Servicing Plan & Noise & Vibration Assessment; H.M. Land Registry Map; Existing & Proposed Floor Plan; Block Plan Received 31st October

Delivery & Servicing Statement Received 22nd May 2017

Background Papers

- (1) Case File LE/745/51/TP
- (2) Core Strategy (June 2011)
- (3) Development Management Local Plan (November 2014)
- (4) London Plan (March 2015, furthered altered in March 2016)

Designation PTAL 6a  
Local Open Space Deficiency  
Major District Centre

Screening N/A

## **1.0 Property/Site Description**

1.1 The application site is on the north side of the part of Marischal Road running parallel to Lee High Road (A20) and is close to the junction with Saxton Close. The entrance to the site is directly to the east of 51 Marischal Road and leads up a slope to a hard paved yard on top of which there are mounds of tyres, some on racks and some piled up ready for fitting to vehicles. The site also contains a large wooden shed to the west side behind no. 51 and an outbuilding housing the workshop, the tyre fitting machines and an office. Behind that, the site is bounded on the south side by a tall London stock brick wall and wooden gates painted yellow. Advertising for 'AK Tyres and Wheels' can be seen on the side of the outbuilding by the entrance and in the form of an A Board on the street.

- 1.2 The currently unlawful use of the site began on 8th April 2014. Before then it was a tree surgery business, which comes under Use Class B1, and which operated from 1993 up to 2014. The industrial element of the use regarding the bailing of tyres for collection by lorries ceased by 24th March, and therefore the current use is Sui Generis.
- 1.3 The properties on this street are largely in residential use, but there are other commercial businesses, including Use Classes A1, A3 and Sui Generis, along the western stretch where the road becomes one way and close to Lee High Road south of the application site.
- 1.4 The property is not within a Conservation Area, not subject to an Article 4 direction nor is it a listed building or within the vicinity of one. However, it does fall within a Major District Centre (Lewisham) and has a PTAL rating of 6b.

## **2.0 Relevant Planning History**

- 2.1 Planning permission was **granted** on 15th October 1957 for the conversion of the dwelling-house at No.51 Marischal Road, Lewisham, into three self-contained flats.
- 2.2 DC/92/35756: Certificate of Lawfulness in respect of the use of the land on the east side of 51 Marischal Road SE13 for storage with a workshop in connection with the Tree Surgeon business. **Granted.**
- 2.3 DC/93/35956: The erection of a 1.9 metre high front boundary wall at 51 Marischal Road SE13. **Granted.**
- 2.4 DC/97/41667/FT: The alteration and conversion of the basement at 51 Marischal Road SE13 to provide 1 three-bedroom self-contained flat together with the installation of a new door and window and the provision of new steps down to the entrance at basement level. **Granted.**
- 2.5 DC/00/47179: The alteration and conversion of part of the ground floor of 51 Marischal Road SE13 to provide 1, two bedroom and 1, one bedroom self-contained flats. **Granted.**
- 2.6 EN/15/00270: Alleged unauthorised change of use of yard from tree surgeon and garden landscaping to tyre yard in addition to unauthorised advertising. **Awaiting outcome of the planning application.**

## **3.0 Current Planning Application**

- 3.1 The application is for the retrospective change of use of the site from workshop (Use Class B1c) to a tyre changing and selling business (Use Class B2 / Sui Generis). The current business operates a booking system for the fitting of tyres, although they do accept customers turning up without prior notice. The proposal does not involve any external, cosmetic changes to the buildings on site.
- 3.2 The opening times are proposed to be 09:00-18:30 Monday-Saturday and 10:00-16:00 on Sunday and Bank Holidays. It would be staffed by two full-time employees.

3.3 Officers note that, whilst the applicant has applied for Use Class B2, the tyre fitting and selling use is considered to fall within the Sui Generis Use Class.

#### **4.0 Consultation**

4.1 No pre-application advice was sought.

4.2 The Council's consultation met the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.

4.3 A site notice was displayed and letters were sent to 27 adjoining residents, Councillor Jeffrey, Lewisham Central Ward Councillors and the Council's Highways and Environmental Health Officers.

4.4 A local meeting was also held on 18th April at 18:30 in a church close to the application site chaired by Councillor Jeffrey. It was well attended and concerns were raised by residents about the current planning use on site and its impact on highways safety, primarily of Marischal Road. The owner of the site attended and responded to those comments, as did the Planning Officer Russell Brown and the Highways Officer Andrew Rawlingson.

#### **Written Responses received from Local Residents**

4.5 13 replies were received, two of which were from neighbours directly consulted, which were made up of 12 objections and one letter of support. The latter stated that the tyre yard has been operating for some time, has caused no problems whatsoever and they did not see any reason why it should not be allowed to continue. The objections raised the following concerns:

- The change of use would be inappropriate for this residential street and this industrial use should be located next to similar uses.
- The lorries have been damaging the road surface and causing noise disturbance.
- The use of the site and the coming and going of lorries in 1987 does not have any relevance to the site's usage now.
- There would be many customers in motor vehicles coming and going from the premises on what is a very crowded road. Customers frequently illegally park on the road and sometimes work is carried out to cars waiting on the street.
- The lorries would have a negative visual impact on this road.
- The change of use would be contrary to Council's planning policies.
- Enforcement action should be taken to turn the land back to its original use.
- Tyres are not delivered to the site every 2-3 weeks by a 3.5m transit, but have been arriving by lorry in large quantities.
- The storage of a vast amount of tyres could lead to arson, accidental ignition or spontaneous combustion.
- The heavy metals present in the tyres are dangerous and pollute the street.
- The site's location on a busy junction causes traffic, mainly HGVs, to block the road and damage to parked cars when the HGVs turn around. The road is unsuitable for HGVs given its narrow, winding and cobbled nature.
- The parking and movement of vehicles raises concerns about pedestrian safety, especially that of children who use the street on the way to and from school.

- If approved, this could pave the way for further industrial expansion and loss of environmental quality.
- The business opens and closes when it suits the employees, including seven days of the week and as early as 07:00.
- The application form states that there is no on-site parking, which is false and four spaces are shown on the floor plan.
- Two very bright arc lights have been installed in the yard, which illuminate houses across the street in a very intrusive way.

## **5.0 Policy Context**

### Introduction

- 5.1 Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:-
- (a) the provisions of the development plan, so far as material to the application,
  - (b) any local finance considerations, so far as material to the application, and
  - (c) any other material considerations.

A local finance consideration means:

- (a) a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown, or
- (b) sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).

- 5.2 Section 38(6) of the Planning Compulsory Purchase Act 2004 makes it clear that 'if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'. The development plan for Lewisham comprises the Core Strategy, Development Plan Document (DPD) (adopted in June 2011), DMLP (adopted in November 2014) and policies in the London Plan (March 2016). The NPPF does not change the legal status of the development plan.

### National Planning Policy Framework

- 5.3 The NPPF was published on 27 March 2012 and is a material consideration in the determination of planning applications. It contains at paragraph 14 a 'presumption in favour of sustainable development'. Annex 1 of the NPPF provides guidance on implementation of the NPPF. In summary this states that (paragraph 211) policies in the development plan should not be considered out of date just because they were adopted prior to the publication of the NPPF. At paragraphs 214 and 215 guidance is given on the weight to be given to policies in the development plan. As the NPPF is now more than 12 months old paragraph 215 comes into effect. This states in part that '...due weight should be given to relevant policies in existing plans according to their degree of consistency with this framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given)'.
- 5.4 Officers have reviewed the Core Strategy for consistency with the NPPF and consider there is no issue of significant conflict. As such, full weight can be given

to these policies in the decision making process in accordance with paragraphs 211, and 215 of the NPPF.

#### Other National Guidance

- 5.5 On 6 March 2014, DCLG launched the National Planning Practice Guidance (NPPG) resource. This replaced a number of planning practice guidance documents.

#### London Plan (March 2016)

- 5.6 On 10 March 2015 the London Plan (further altered in March 2016) was adopted. The policies relevant to this application are:

Policy 2.7 Outer London: Economy

Policy 2.13 Opportunity areas and intensification areas

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.13 Parking

Policy 7.1 Building London's neighbourhoods and communities

Policy 7.4 Local character

Policy 7.15 Reducing noise and enhancing soundscapes

#### Core Strategy

- 5.7 The Core Strategy was adopted by the Council at its meeting on 29 June 2011. The Core Strategy, together the Development Management Local Plan and the London Plan is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Lewisham Core Strategy as they relate to this application:

Spatial Policy 1 Lewisham Spatial Strategy

Spatial Policy 5 Areas of Stability and Managed Change

Core Strategy Policy 5 Other employment locations

Core Strategy Policy 14 Sustainable movement and transport

#### Development Management Plan

- 5.8 The Development Management Local Plan was adopted by the Council at its meeting on 26 November 2014. The Development Management Local Plan, together with the Core Strategy and the London Plan is the borough's statutory development plan. The following policies are relevant to this application:-

DM Policy 1 Presumption in favour of sustainable development

DM Policy 26 Noise and vibration

DM Policy 11 Other employment locations

### **6.0 Planning Considerations**

- 6.1 The relevant planning considerations relate to the principle of development, the loss of a site for B1 usage and the proposal's impact on the surrounding area, neighbouring properties and on highways / traffic.

*Principle of change of use and loss of B1 unit*

- 6.2 London Plan Policy 2.7 states that Boroughs should seek to address constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends by managing and improving the stock of industrial capacity to meet both strategic and local needs, including those of small and medium sized enterprises (SMEs)
- 6.3 London Plan Policy 7.1 states that development should contribute to people's sense of place, safety and security.
- 6.4 Core Strategy Policy 5 states that the Council will protect the scattering of employment locations throughout the borough outside Strategic Industrial Locations, Local Employment Locations and Mixed Use Employment Locations. Employment land within town centres, which has the potential to contribute to a Major town centre should be recommended for retention in employment use.
- 6.5 DM Policy 11 states that the Council will seek to retain employment uses (B Use Class) on sites and buildings in Town Centres where they are considered capable of continuing to contribute to and support clusters of business and retail uses, and where the use is compatible with the surrounding built context. A number of site characteristics and factors will be taken into account when reaching this assessment. This will include whether sites:
- a. are well located in relation to the highway network;
  - b. are well located in relation to town centres and public transport;
  - c. offer the potential for the expansion of existing in-situ businesses;
  - d. offer the potential for the provision of workshop/industrial units for small and medium sized enterprises (SMEs) serving local residential and commercial areas, particularly where there is little alternative provision in the local area; or
  - e. provide lower cost accommodation suitable for small, start-up businesses.
- 6.6 The application site is designated as an 'other employment location' and is therefore protected by the above policies. The site was not vacant in-between its use as a tree surgery business and the current tyre fitting and selling business, which also used to involve the disposal of used tyres, specifically the storage of them until collection. Local policies support the retention of an employment use on site, specifically B Use Classes. The B1(c) use class covers light industry businesses that are appropriate in a residential area.
- 6.7 The site is close to both Lee High Road, an A Road, and Belmont Hill, a B Road, as well as being very close to Lewisham town centre. Employees arrive by private motor vehicles, but the closest bus stops are 2 minutes' walk away with Lewisham and Blackheath train stations 0.5 and 0.8 miles away respectively.
- 6.8 The site is relatively constrained, but it does allow for an intensification of the use subject to impact on highways, traffic levels and on neighbouring residential properties, which will be addressed later on in this report. Also due to its size, the site does not offer the potential for the provision of workshop / industrial units for Small and Medium Sized Enterprises (SMEs) nor would it be able to provide lower cost accommodation suitable for small, start-up businesses. This is considered to be acceptable in the circumstances.
- 6.9 Although Officers have regard to the way the business was run prior to this report being written, this application will be assessed on the basis of the current use as

observed on the Officer's site visit and on how the applicant wants to run the business going forward. To that end, the bailing up of tyres and their storage on the site has ceased. It is understood that this activity ceased in March. The bailing machine was removed previously.

- 6.10 Officers have reviewed the security of the site and consider it to be as safe as can reasonably be expected for an open yard with a locked front gate. Movement sensitive security lights have been installed to the east elevation of no. 51 and the control of the luminance levels of these can be secured by condition.
- 6.11 The current use would fall under Sui Generis, but would be similar in nature to the previous tyre surgery business use, including providing employment, such that the loss of a B1(a) site would be acceptable. The change of use back to B1, while requiring planning permission, could also be easily reversed. It is recommended that a condition be added restricting the use to the selling and fitting of tyres.
- 6.12 As such, the principle of the change of use has been found to be acceptable.

*Impact on the amenity of neighbouring occupiers*

- 6.13 London Plan Policy 7.15 states that development proposals should seek to manage noise by:
- a. avoiding significant adverse noise impacts on health and quality of life as a result of new development; and
  - b. mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens on existing businesses.
- 6.14 DM Policy 26 Noise and vibration states that the Council will require a Noise and Vibration Assessment for noise generating equipment, where appropriate, to identify issues and attenuation measures, prepared by a qualified acoustician. Where development is permitted, conditions may be attached to the planning permission to ensure noise insulation or other mitigation measures are undertaken.
- 6.15 A noise and vibration statement submitted with the application stated that the tyre-fitting machine and balancer are vibration-free and silent. The piston air compressor used to inflate tyres is contained within a shed that has the effect of suppressing noise levels and it only runs for approximately two minutes every four hours when air is low in the tank.
- 6.16 The machines that were on site were located within the workshop to the front of the site. During a site visit, Officers observed and heard the tyre-fitting machine and the piston air compressor, neither of which made any noise that would be audible much outside the workshop and certainly not outside the site itself.
- 6.17 It is noted that the applicant owns the property at no. 51, but the use is not considered to have any impact on their amenities given the low noise emitted by the machines and the site being largely used during typical working hours.
- 6.18 Any other noise relates to lorries and other vehicles entering and exiting the site, which shall be addressed in the next section of this report.

- 6.19 Given the opening hours, which can be secured by condition, the use is not considered to be detrimental to neighbouring occupiers.

### *Highways*

- 6.20 London Plan Policy 6.3 Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.
- 6.21 London Plan Policy 6.9 states that developments should provide secure, integrated, convenient and accessible cycle parking facilities in line with the minimum standards set out in Table 6.3 and the guidance set out in the London Cycle Design Standards.
- 6.22 London Plan Policy 6.13 states that the maximum standards set out in Table 6.2 should be the basis for considering planning applications, informed by policy. In addition, developments in all parts of London must:
- a. ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles;
  - b. provide parking for disabled people in line with Table 6.2;
  - c. meet the minimum cycle parking standards set out in Table 6.3;
  - d. provide for the needs of businesses for delivery and servicing.
- 6.23 Officers acknowledge that there has been an increase in general comings and goings compared with the previous use, albeit the site has been accessed by cars and vans rather than trucks and pick-ups. However, Officers consider that, with the exception of the lorries that picked up the tyres, this does not cause a detrimental impact on highways. The applicant has stated that any used tyres will be removed from the site by a van with a 'Luton body', weighing approximately 32.5 tonnes, in the future. This is the type of vehicle that the business owner would also use for deliveries, of which there are two per week, and between one and two collections. Officers recommend these be secured by the use of an appropriate condition.
- 6.24 A Delivery and Servicing Statement has been submitted covering the following matters:
- capacity of the site for 12 motor vehicles (three in the fitting bays, nine waiting)
  - number of deliveries (two) and collections (one-two) between 09:00-18:30
  - entry into and exit from the site with space to turn around
  - noise, with car engines turned off during tyre fittings, delivery and collections
  - date of review (May 2018 at the latest).
- 6.25 Whilst requiring the use of a banksman during deliveries and the entry and exit of vehicles in forward gear by condition would not be enforceable, the applicant will have to comply with the Delivery and Servicing Statement. Officers acknowledge that the existing access arrangements are far from ideal, providing little vehicle-to-pedestrian visibility from inside the site, but they are to remain as existing, which is the same as they were when the tree surgery business use was in operation. Therefore, no objection is raised to this.

- 6.26 The application site has a very high PTAL level of 6b (where 0 is poor and 6b is excellent) and is therefore well served by public transport. Since the nature of use requires customers to drive their cars to the site, the use would lead to increased traffic in the vicinity. Notwithstanding section 10 (vehicle parking) of the application form, there are three fitting bays and nine parking bays on site, as mentioned in the Delivery and Servicing Statement. This therefore limits the extent of the use.
- 6.27 London Plan Policy 6.13 requires one commercial vehicle parking space per 500m<sup>2</sup> of gross B2 (the site is 533m<sup>2</sup>), which shall be secured by condition along with one short-stay and one long-stay cycle parking space.
- 6.28 As such, this application would be acceptable in highways terms subject to suitable conditions being imposed.

## **7.0 Equalities Considerations**

- 7.1 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 7.2 In summary, the Council must, in the exercise of its function, have due regard to the need to:
- (a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
  - (b) advance equality of opportunity between people who share a protected characteristic and those who do not;
  - (c) Foster good relations between people who share a protected characteristic and persons who do not share it.
- 7.3 The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 7.4 The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at: <http://www.equalityhumanrights.com/legal-and-policy/equality-act/equality-act-codes-of-practice-and-technical-guidance/>
- 7.5 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
1. The essential guide to the public sector equality duty
  2. Meeting the equality duty in policy and decision-making

3. Engagement and the equality duty
4. Equality objectives and the equality duty
5. Equality information and the equality duty

7.6 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at:  
<http://www.equalityhumanrights.com/advice-and-guidance/public-sector-equality-duty/guidance-on-the-equality-duty/>

7.7 The planning issues set out above do not include any factors that relate specifically to any of the equalities categories set out in the Act, and therefore it has been concluded that there is no impact on equality.

## **8.0 Conclusion**

8.1 Officers have considered the particular circumstances of the application against relevant planning policy set out in the Development Management Local Plan (2014), the Core Strategy (2011), London Plan (March 2016) and the National Planning Policy Framework (2012).

8.2 It is considered that the principle of the change of use and the loss of the B1 unit is acceptable given the similar characteristics of the existing business, with the current use not having any significant impacts on the surrounding area, neighbouring properties and on highways / traffic that cannot be addressed by the imposition of suitable conditions.

**9.0 RECOMMENDATION: GRANT PLANNING PERMISSION** subject to the following conditions:

- 1) The development shall be retained strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

Statement Regarding the Previous Usage of the Yard before Top Shop Tyres; Delivery & Servicing Plan & Noise & Vibration Assessment; H.M. Land Registry Map; Existing & Proposed Floor Plan; Block Plan Received 31st October

Delivery & Servicing Statement Received 22nd May 2017

Reason: To ensure that the development is retained in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

- 2) No deliveries shall be taken at or despatched from the site other than between the hours of 08:00 and 20:00 on Mondays to Fridays, 08:00 and 13:00 on Saturdays, or at any time on Sundays or Public Holidays. The site shall only be serviced by a van with a 'Luton body'.

Reason: To safeguard the amenities of the adjoining residential occupiers and the safety of the public highways in compliance with Paragraph 120 of the National

Planning Policy Framework, Policy 6.3 Assessing effects of development on transport capacity of the London Plan (March 2015, as further altered in March 2016), Policy 14 Sustainable movement and transport of the adopted Core Strategy (June 2011) and DM Policy 26 Noise and vibration of the Development Management Local Plan (November 2014).

- 3) The site shall only be open for customer business between the hours of 09:00 and 18:30 on Mondays to Saturdays and between 10:00 and 16:00 on Sundays and Bank Holidays.

Reason: In order to safeguard the amenities of adjoining occupants at unsociable periods and to comply with Paragraph 120 of the National Planning Policy Framework and DM Policy 26 Noise and vibration of the Development Management Local Plan (November 2014).

- 4) (a) Prior to occupation of the development a scheme for any external lighting that has been installed at the site, including measures to prevent light spillage, shall be submitted to and approved in writing by the local planning authority.

(b) Any such external lighting as approved under part (a) shall be installed in accordance with the approved drawings and such directional hoods shall be retained permanently.

(c) The applicant should demonstrate that the lighting is the minimum needed for security and working purposes and that the proposals minimise pollution from glare and spillage.

Reason: In order that the local planning authority may be satisfied that the lighting is installed and maintained in a manner which will minimise possible light pollution to the night sky and neighbouring properties and to comply with DM Policy 27 Lighting of the Development Management Local Plan (November 2014).

- 5) (a) A minimum of one short-stay and one long-stay cycle parking spaces that are secure and dry shall be provided within the development.

(b) All cycle parking spaces shall be provided and maintained thereafter.

Reason: In order to ensure adequate provision for cycle parking and to comply with Policy 6.9 Cycling of the London Plan (March 2015, as further amended in March 2016) and Policy 14 Sustainable movement and transport of the Core Strategy (2011).

- 6) A minimum of one commercial vehicle parking space shall be provided within the development.

Reason: In order to ensure adequate provision for cycle parking and to comply with Policy 6.13 Parking of the London Plan (March 2015, as further amended in March 2016) and Policy 14 Sustainable movement and transport of the Core Strategy (2011).

- 7) The site shall only be used for the selling and fitting / changing of tyres to motor vehicles and for no other purpose (including any other purpose in Use Class Sui Generis of the Schedule to the Town and Country Planning (Use Classes) Order

1987, or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order).

Reason: To safeguard the amenities of the adjoining residential occupiers and the safety of the public highways in compliance with Policy 6.3 Assessing effects of development on transport capacity of the London Plan (March 2015, as furthered altered in March 2016) and Policy 14 Sustainable movement and transport of the adopted Core Strategy (June 2011).

### **INFORMATIVE**

**Positive and Proactive Statement:** The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, positive discussions took place which resulted in further information being submitted.