

Committee	PLANNING COMMITTEE B	
Report Title	197 NEW CROSS ROAD, LONDON, SE14 5DQ	
Ward	NEW CROSS	
Contributors	Russell Brown	
Class	PART 1	20th October 2016

<u>Reg. Nos.</u>	DC/16/096758
<u>Application dated</u>	20.05.2016
<u>Applicant</u>	Coral Racing Limited
<u>Proposal</u>	The proposed change of use of the ground floor of 197 New Cross Road, SE14 from a bank (Use Class A2) to a licensed betting shop (Sui Generis).
<u>Applicant's Plan Nos.</u>	14/3971/01; 14/3971/02; Heritage Statement  Statement of Responsible Gambling; ASB Reports & Crime Map; Supplementary Letter to LPA 19.07.2016 Received 19th July 2016
<u>Background Papers</u>	(1) Case File DE/414/197/TP (2) Core Strategy (June 2011) (3) Development Management Local Plan (November 2014) (4) London Plan (March 2016)
<u>Designation</u>	PTAL 6a Hatcham Conservation Area Hatcham Conservation Area Article 4(2) Direction Area of Archaeological Priority Major District Centre A Road
<u>Screening</u>	N/A

## **1.0 Property/Site Description**

- 1.1 The application site is located on the north east side of New Cross Road (A2) where it curves northwards, eventually to meet Old Kent Road, and opposite the junctions with Queens Road (A202) to the west and Pepys Road to the south. The rear backs onto undeveloped land off Hatcham Park Mews.
- 1.2 The building itself is three storeys plus attic and built in the 1880s-90s and designed in the neogeorgian style. The importance of the ground floor is demonstrated by the rusticated stonework and pedimented entrance. Above that, eight over eight pane sash windows are set regularly in brown brick with red brick dressings. The two pediment style gables and tall chimneys crown the building.

- 1.3 The ground floor is currently vacant, having last been used as a Barclay's bank (Use Class A2) until 27th September 2013. A NHS dental care centre (Use Class D1) occupies the first floor, while the second floor and attic rooms are empty.
- 1.4 The site is within the Hatcham Conservation Area, subject to an Article 4 direction, but is not a listed building, although it is opposite the Grade II listed White Hart building. It is in a Major District Centre (New Cross) and has a PTAL rating of 6a.

## **2.0 Relevant Planning History**

- 2.1 DC/93/04345: The display of an internally-illuminated cash dispenser sign on the front elevation of 197 New Cross Road SE14. **Granted.**
- 2.2 DC/93/36268: The installation of a cash dispenser in the front elevation of 197 New Cross Road SE14. **Granted.**
- 2.3 DC/99/44325: The replacement of an ATM cash dispenser in the front elevation of Barclays Bank. **Granted.**
- 2.4 DC/99/05019: The display of an internally-illuminated cash dispenser sign on the front elevation of Barclays Bank Road SE14. **Granted.**
- 2.5 DC/00/47647: The display of an internally illuminated fascia sign and projecting sign at 197 New Cross Road SE14. **Granted.**
- 2.6 DC/03/54374/FT: The display of an internally-illuminated fascia panel sign for the additional automatic cash dispenser to the front elevation of 195/197 New Cross Road SE14. **Granted.**
- 2.7 DC/03/54373/FT: The installation of an additional automatic cash dispenser to the front elevation of 195/197 New Cross Road SE14. **Granted.**
- 2.8 DC/11/76907/X: The installation of 5 antennas mounted on the chimneys on the west and east sides of the roof and 1 equipment cabinet and meter pillar at ground floor level at 195-197 New Cross Road SE14. **Refused as the location of the proposed antennae on both the front and side elevations of the building was considered to be inappropriate on this significant building within the Hatcham Conservation Area and unsympathetic to the architectural qualities of this prominent building within the street scene, in addition to the proposed equipment cabinet having been considered to result in additional street clutter within the conservation area, which would have had a detrimental impact on its character.**

## **3.0 Current Planning Application**

- 3.1 Planning permission is sought for the change of use from bank (Use Class A2) to a licensed betting shop (Sui Generis) at ground floor level only. No external changes are proposed.
- 3.2 It is proposed to open from 08:00 to 22:00 Mondays to Sundays including Bank Holidays and would employ two full-time and four part-time employees.

## 4.0 Consultation

- 4.1 No formal pre-application advice was sought, although a call was made to Lewisham's planning policy team who confirmed that the property does not lie within either a primary or secondary frontage. As such, there is no policy that is directly relevant to the proposal, although Core Strategy Policy 6 and paragraph 2.101 of the Development Management Local Plan should be considered.
- 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 Public and site notices were displayed and letters were sent to four adjoining residents, New Cross Ward Councillors and the Council's Conservation Officer.
- 4.4 The Council's Conservation Officer had no comments to make as no external alterations would be made as part of this application.

### Written Responses received from Local Residents

- 4.5 56 objections were received from local residents, raising the following concerns:
- An over-saturation of betting shops in the vicinity and a new one is not required.
  - Adverse impact upon primary and secondary schools as well as hostels for vulnerable adults in the immediate area.
  - The use of the building in Lewisham's Cumulative Impact Zone and Controlled Drinking Zone could lead to on-street alcohol consumption, drug-taking and anti-social behaviour, as seen outside other betting shops in the area.
  - The proposed use would contribute to poverty in the area.
  - The proposed use would ruin the historic and beautiful building, which is in a key location within New Cross.
  - The building should be used for a restaurant, bar, cultural centre, cinema, 'upscale' shop, library or community use.
  - It would not increase the wide range of uses in the town centre, only replicate the existing services, and it would not sustain or enhance the vitality and viability of New Cross by not supporting the local economy.
  - The proposal would generate problems around highways safety, traffic generation, noise and general disturbance.
  - The proposed use sends out the wrong message to the young and disaffected and could fuel gambling addiction.
  - The shop fascia, which can be seen on the nearby Coral shop, would be an eyesore on this rather grand building.
  - Another betting shop would substantially detract from the economic and community improvements in this area.
  - The use would likely increase loitering at a narrow section of the pavement, thereby causing an obstruction.
  - The late night opening hours would see people avoiding the building, which is on a dangerous corner crossing.
  - The area outside the Post Office next door would see an increase in littering.
  - The proposed opening hours are unacceptable.
  - This proposal would negate much of the recent effort and money that has gone into regenerating the local area and would discourage investors from

taking on new premises in the area as well as appearing attractive to shoppers.

- Healthy habits and pursuits should be encouraged and this area, which is one of the most deprived in Lewisham, should not be degraded by targeting the poor and working class people.
- There has been significant local interest in this site and the change of use to Sui Generis would limit its future use.
- There is evidence that suggest that Fixed Odds Betting Terminals (FOBTs) are the most addictive form of gambling and in 2012 over £1.5 billion was lost on them in the UK. There are approximately 227 in the borough and gamblers are estimated to have lost £14,429,863 on them.
- It would be an unsustainable change of use that goes against national local policy considerations.
- No planning notice has been displayed, which is a legal requirement and prevents local people from learning of the plans in advance, and therefore a wider public consultation is requested.

4.6 Of the issues raised, only those related to over-concentration of betting shops, neighbouring amenity, the protection of historic assets, the vitality and viability of New Cross town centre, highways issues, noise and opening hours are relevant planning considerations.

4.7 In addition, a petition was received against the proposal, with 22 signatures.

## **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 14 March 2016 the London Plan (consolidated with alterations since 2011) was adopted. The policies relevant to this application are:

Policy 2.13 Opportunity Areas and Intensification Areas

Policy 2.15 Town centres

Policy 4.8 Supporting a successful and diverse retail sector and related facilities and services

Policy 7.1 Lifetime neighbourhoods

Policy 7.8 Heritage assets and archaeology

#### 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 2 Regeneration and Growth Areas

Core Strategy Policy 16 Conservation areas, heritage assets and the historic environment

#### 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 30 Urban design and local character

DM Policy 36 New development, changes of use and alterations affecting designated heritage assets and their setting: conservation areas, listed buildings, schedule of ancient monuments and registered parks and gardens

Hatcham Conservation Area Character Appraisal (February 2006)

- 5.9 The application property is described in its own paragraph under the Character of New Cross Road and is listed as an 'architectural gem' in this document, as identified by the New Cross Gate Urban Design Framework and Development Strategy.

## **6.0 Planning Considerations**

- 6.1 The relevant planning considerations are the loss of the existing use and the acceptability of the proposed use, the impact on the property and the character and appearance of the Hatcham Conservation Area as well as on highways and the amenities of neighbouring residents.

### *Principle of development*

- 6.2 London Plan Policy 2.13 states that development proposals should provide necessary social and other infrastructure to sustain growth and, where appropriate, contain a mix of uses.
- 6.3 London Plan Policy 2.15 designates New Cross as a District Centre.
- 6.4 London Plan Policy 4.8 states that Local Development Frameworks should take a proactive approach to planning for retailing and related facilities and services and provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping and facilities which provide local good and services as well as manage clusters of uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including a centre's:
- i. broader vitality and viability;
  - ii. broader competitiveness, quality or diversity of offer
  - iii. sense of place or local identity
  - iv. community safety or security
  - v. success and diversity of its broader retail sector
- 6.5 London Plan Policy 7.1 states that development should maximise the opportunity for community diversity, inclusion and cohesion; and should contribute to people's sense of place, safety and security.
- 6.6 As the property is not located within a designated shopping frontage, it is not afforded any protection by Core Strategy Policy 6 or DM Policy 14. Town centre areas located outside both the primary and secondary frontage tend to contain a much greater variety of uses and therefore national and local policies encourage a much more flexible approach to proposed changes of use.

- 6.7 A2 units have a permitted change of use to A1, but it is not considered that the proposed use would remove 'in-demand' retail space since there were at least five vacant retail units found in the immediate vicinity during a retail survey of 39 shops in the parades on both sides of the street conducted by Officers on 30<sup>th</sup> September 2016 (see Appendix 1). There were nine vacant retail units on 14<sup>th</sup> May 2016 according to the applicant. It is not unusual for a turnover of units such that some of those nine vacancies in May would have now been filled and some of the units that were in use have become vacant. Moreover, it is noted that the lawful use is A2 and the ground floor of the building has been vacant for three years during which time no applications for change of use have been received.
- 6.8 A retail footfall survey has been submitted with this application, which was conducted by ESA retail on behalf of Coral, and sought to gain a greater understanding of the shopping habits of their customers to see whether they visited a betting shop in isolation or in combination with other shops and services too. The survey included town centres, Wellington in Shropshire and Leighton Buzzard in Bedfordshire, which are both of a comparable size to New Cross in terms of population. It found that 72% of customers to Coral combined their trip with other shops in the local area, whilst only 28% would never visit other shops, and that Coral was the most popular shop, especially on a Saturday. 26% of customers stated that they would visit weekly and another 22% on a daily basis.
- 6.9 As such, it is not considered that a betting office in the proposed location would harm the vitality or viability of the existing centre in terms of the number of trips.
- 6.10 In order for town centres to be successful and competitive, they must provide customer choice and a diverse retail offer. It is acknowledged that betting offices can cause detrimental impacts because of their location or concentration. For this reason, planning policy seeks to resist proposals that would result in an unacceptable concentration of such a use, detrimentally affect amenity or result in adverse effects arising from crime, disorder or anti-social behaviour.
- 6.11 Approximately 41% of the units in the vicinity of the application site are in A1 use, with a further 15% in A2 use. Nearly 31% are in non-retail use with only one of these being in use as a betting shop (William Hill at no. 174). On this basis, there would not be an undue proliferation of betting shops in the area as a result of the proposal. The other Coral premises at no. 141 fell outside of the scope of Officers' retail survey, but even if included in the survey, notwithstanding there would be more shops surveyed, betting shops would only represent 5% of all the units within the area in that use.
- 6.12 The applicant has stated that, were they to gain approval for this site, they would lease the existing betting office out to a prospective tenant, but not to a betting company. Although this cannot be secured by condition, any future proposals for betting shops in the area would be considered in the light of the number of such premises at that time.
- 6.13 Therefore, the loss of the existing use in this location is acceptable and the proposed use is compliant with policy.

## *Conservation*

- 6.14 London Plan Policy 7.8 states that development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.
- 6.15 Core Strategy Policy 16 states that the Council will ensure that the value and significance of the borough's heritage assets and their settings, conservation areas, listed buildings, archaeological remains, registered historic parks and gardens and other non designated assets such as locally listed buildings, will continue to be monitored, reviewed, enhanced and conserved according to the requirements of government planning policy guidance, the London Plan policies, local policy and English Heritage best practice.

DM Policy 30 states that the Council will require all development proposals to attain a high standard of design, including alterations and extensions to existing buildings. The retention and refurbishment of existing buildings that make a positive contribution to the environment will be encouraged and should influence the character of new development and a sense of place. An adequate response to how the scheme relates to the existing street including its building frontages will be required including a statement describing the significance of the heritage asset, including its setting will be required for proposals that impact on such an asset.

- 6.16 DM Policy 36 states that the Council will require a statement that describes the significance of the asset and its setting and an assessment of the impact on that significance for development proposals affecting heritage assets. Also required is clear and convincing justification if the significance of an asset may be harmed or lost through physical alteration or destruction, or development within its setting. The Council will not grant planning permission where:
- a. alterations to existing buildings is incompatible with the special characteristics of the area, its buildings, spaces, settings and plot coverage, scale, form and materials; or
  - b. development, which in isolation would lead to less than substantial harm to the building or area, but cumulatively would adversely affect the character and appearance of the Conservation Area.
- 6.17 Whilst the special nature of the building, and its location on a prominent corner site upon arrival to New Cross from the north and west, thereby constituting its status as a local landmark, are recognised, it is not a nationally or locally listed building. As such, it is only afforded protection by virtue of being in a Conservation Area and its architectural significance comes from its external features. Since there are no external changes proposed as part of this application then the use would have no significant impact on the building itself nor on the character or appearance of the Hatcham Conservation Area.
- 6.18 Planning policy at all levels encourages the refurbishment of historic buildings and proposals to bring them back into viable use that sustains their long term conservation. In this context the application is supported.

## *Highways*

- 6.19 The site has a PTAL rating of 6a, so is well served by regular public transport. The aforementioned retail footfall survey showed that 63% of Coral customers arrived



by public transport, cycling or by foot. Whilst it is difficult to know exactly how accessible the location of the stores used in the survey are, they are all in town centres. One of them, Grove Park, is within the London Borough of Lewisham and the figures in relation to travel to the shop would represent a better indication for the proposed store in New Cross. The Grove Park store has a PTAL rating of 5, is also on an A Road (A2212) and had the highest percentage of people walking to it (62%) whilst only 12% went by car and 20% by bus.

- 6.20 Given the higher PTAL rating of the subject site, a higher proportion of travel by sustainable modes would be expected. It is further noted that there are 5 cycle stands on the footpath directly outside the application site. Two cycle spaces for staff are proposed to be secured by condition in line with Policy 6.9 of the London Plan.
- 6.21 Furthermore, the unit would not require servicing so being on a Red Route where no stopping is permitted would not pose a problem.
- 6.22 Concerns have been raised about people blocking the pavement, but this is not considered to be a problem given the large area available for congregation of people outside the Post Office next door and there is a crossing point slightly further up New Cross Road at no. 189.

*Impact on the amenity of neighbouring occupiers*

- 6.23 There would be no impact on the amenities of neighbouring properties from the proposed change of use as levels of sunlight, daylight, associated overshadowing, outlook and privacy would remain the same.
- 6.24 However, there is the potential for the proposed use to lead to increased noise levels, certainly since the building has been vacant for three years. On one side of the site there is a Post Office and on the other, a hairdressers on the ground floor with residential above. The most noise sensitive address would therefore be the latter. The part of the ground floor closest to no. 193 is that which is taken up by the staircases to the basement and the dentist upstairs so, combined with the change of use being confined to ground floor level, it is not considered that there would be a significant impact on the residential occupiers above the hairdressers. Furthermore, the unit is already in a noisy location on the A2, a main access road between London and Dover, and two other junctions, one of which is also an A road.
- 6.25 The opening hours are typical for other commercial units in the area and would mirror those for the branch of William Hill at no. 174 and are therefore considered to be acceptable.
- 6.26 Officers consulted the Metropolitan Police's online crime map for the area to check for instances of anti-social behaviour or crime related to the store. As of 13th July 2016 a single incident of anti-social behaviour in the vicinity of the existing Coral betting shop at no. 141 was identified, having occurred in June 2015. It is not clear whether this incident related to the existing Coral shop, but the applicant has stated that it was not related to no. 141 itself. Officers consider that it would be unreasonable to refuse this application on the basis that the proposed use might lead to increased levels of crime, disorder or anti-social behaviour given the lack of substantiated evidence of anti-social behaviour at the existing branch.

- 6.27 The applicant, Coral Racing, have submitted a Statement of Responsible Gambling that underlines the fact that they are a key member of the Association of British Bookmakers (ABB), which represents around 80% of all betting office operators in Great Britain.
- 6.28 Compliance with the new Harm Minimisation Strategy is mandatory for members of the ABB and they state that they are a responsible operator who is fully committed to meeting their obligations. They also stated that they are aware of the public concern over some issues of problem gambling and are committed to not only adhering to the ABB's Code of Practice, but also to continuing to work with the ABB and other stakeholders to ensure customers are encouraged to gamble responsibly.
- 6.29 Therefore, the proposal is considered to have an acceptable impact on neighbouring amenity.

## **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 proposed change of use would be acceptable in principle and would not result in significant harm being caused to the building, Hatcham Conservation Area or to the amenities of neighbouring occupiers.

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

1) The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990.

2) The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

14/3971/01; 14/3971/02; Heritage Statement

Statement of Responsible Gambling; ASB Reports & Crime Map; Supplementary Letter to LPA 19.07.2016 Received 19th July 2016

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

3) The premises shall only be open for customer business between the hours of 8am and 10pm on any day of the week.

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, DM Policy 32 Housing design, layout and space standards, DM Policy 14 District centres shopping frontages, DM Policy 16 Local shopping parades and corner shops of the Development Management Local Plan (November 2014).

- 4) (a) A minimum of two secure and dry cycle parking spaces shall be provided within the development.
- (b) No development shall commence on site until the full details of the cycle parking facilities have been submitted to and approved in writing by the local planning authority.
- (c) All cycle parking spaces shall be provided and made available for use prior to occupation of the development 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 2016) and Policy 14: Sustainable movement and transport of the Core Strategy (June 2011).

### **INFORMATIVES**

**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.

The applicant is advised that any new signage associated with the proposed use would require advertisement consent and any changes to the existing frontage would require a separate application for planning permission.

**Appendix 1**



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