

**Application No:** [W 19 / 0827](#)

**Town/Parish Council:** Warwick  
**Case Officer:** Helena Obremski

**Registration Date:** 20/05/19  
**Expiry Date:** 19/08/19

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**Homebase Ltd, 46-48 Emscote Road, Warwick, CV34 4QP**

Detailed planning application for demolition of existing building and erection of a Class A1 retail foodstore with associated car parking, access, landscaping, substation and engineering works. FOR Lidl Great Britain Ltd

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This application is being presented to Committee due to the number of letters of support which have been received.

**RECOMMENDATION**

Planning Committee are recommended to REFUSE planning permission for the reason set out in the report.

**DETAILS OF THE DEVELOPMENT**

The application seeks planning permission for the demolition of the existing building and erection of an A1 retail foodstore, with associated car parking, access, landscaping, substation and engineering works. The proposed foodstore is to be occupied by Lidl, a discount food retailer.

The proposed building would have a smaller footprint than the existing building and be far smaller in terms of overall scale and mass. The building would be single storey, with a monopitch roof design, with a large glazed frontage facing Emscote Road. The remaining elevations would benefit from a mix of silver and white aluminium cladding. Access to the site remains the same as the existing and 97 parking spaces are proposed, with 2 spaces for electric vehicles (with charge points), 7 disabled spaces and 8 parent and child spaces.

The landscape plan has been amended to accommodate requests made by WCC Landscape. There is proposed soft landscaping to the front of the site adjacent to Emscote Road, and a small amount to the rear. Existing trees to the centre of the site would not be retained.

**THE SITE AND ITS LOCATION**

The application relates to an existing retail unit (Homebase), positioned to the south of Emscote Road and is accessed from Pickard Way. Residential properties surround the site to the east, south and west, with a vehicle service and repair shop positioned on the opposite side of Emscote Road.

The site is located outside of the town centre and is in Flood Zone 1.

## **PLANNING HISTORY**

W/18/0170 - application withdrawn for variation of Condition 1 of planning permission W/98/1450 to allow for the sale of food and drink, toiletries, toys and games and non-fashion clothing and footwear (limited only to: underwear and nightwear; slippers, baby clothing, school wear; and seasonal or safety items: boots, sandals, hats, gloves, scarves, partywear/costumes) across 780sqm of the floorspace of the building.

W/98/1450 - application granted for variation of Condition 4 (Use Class) of W/84/0187 to allow the sale of pets, pet food and other pet related products.

W/97/1253 - application granted for variation of Condition 4 of W/84/0187 (restriction on goods to be sold).

W/95/1343 - application granted for alterations to elevations; construction of an entrance ramp; alterations to car parking layout and alteration to refuse area and amend condition 4 of pp. W/84/0187 (sales restricted to DIY goods, etc.) for sublet area.

W/88/1641 - application granted for alterations to elevation to provide new entrance.

W/84/0187 - application granted for alterations and extensions to form retail store and garden store. erect 3 storey block of 30 flats for the elderly and new link road.

## **RELEVANT POLICIES**

- National Planning Policy Framework

### The Current Local Plan

- BE1 - Layout and Design
- BE3 - Amenity
- NE2 - Protecting Designated Biodiversity and Geodiversity Assets
- TR1 - Access and Choice (Warwick District Local Plan - 2011-2029)
- TR2 - Traffic generation (Warwick Local Plan - 2011-2029)
- TR3 - Parking (Warwick District Local Plan - 2011-2029)
- NE5 - Protection of Natural Resources
- TCP1 - Protecting and Enhancing the Town Centres
- TC2 - Directing Retail Development
- FW2 - Sustainable Urban Drainage
- FW3 - Water Conservation
- CC2 - Planning for Renewable Energy and Low Carbon Generation
- CC3 - Buildings Standards Requirements

### Guidance Documents

- Parking Standards (Supplementary Planning Document)
- Distance Separation (Supplementary Planning Guidance)
- The 45 Degree Guideline (Supplementary Planning Guidance)
- Air Quality & Planning Supplementary Planning Document (January 2019)

## **SUMMARY OF REPRESENTATIONS**

**Warwick Town Council:** Objection, increase in traffic in an area which is already severely congested and impact on area of flooding.

**WCC Ecology:** No objection, recommends a condition to secure biodiversity enhancements.

**WCC Local Lead Flood Authority (LLFA):** No objection, subject to condition.

**WCC Highways:** Objection, the proposal would result in the generation of significant traffic movements, which would lead to significant delays and further congestion along a route which already experiences a high level of congestion. Inadequate parking provision made.

**WCC Landscape:** Recommends retention of existing trees.

**Environmental Health:** No objection, subject to either provision of damage costs of £39,609.34, or suitable mitigation scheme relating to air quality and conditions.

**Public Responses:** 28 Objections:

- traffic congestion and highway safety concerns;
- impact on nearby residents parking;
- noise nuisance from the construction works, HGV deliveries and refrigeration / plant equipment, increased vehicular movements in the parking area, loss of buffer strip;
- increased littering;
- increased pollution from additional traffic and building works;
- there is economic disadvantage for the remaining local CTN shops as the area is already served by Tesco and Sainsburys and the proposal is not needed;
- loss of trees - loss of amenity for neighbouring residents and climate change;
- loss of a home store;
- concern regarding access for emergency vehicles;
- preference for alternative retailer such as B&M;
- loss of a DIY store not compensated for;
- Homebase currently allows parents to park in the car park when dropping off children to Coten End School and employees of nearby business, which would be dispersed into the highway.

**Emscote Gardens Residents Association:** Objection:

- detrimental impact on existing parking stress in surrounding residential streets;
- detrimental impact on highway and pedestrian safety;

- impact on neighbouring residential amenity - noise disturbance from additional traffic, HGV movements and extended opening hours;
- increased levels of pollution in areas which already suffer from high levels;
- detrimental economic impact on existing retail units;
- increased risk of flooding;
- archaeological impact not fully addressed;
- the aims of the Travel Plan are rarely achieved.

#### 12 Support:

- it will increase choice for shoppers and much needed local facilities;
- it will allow those who cannot travel far to access more services;
- in a convenient place for many people to access;
- the plans indicate sensitivity to the environment;
- the proposals are likely to ease traffic congestion;
- there will be an improvement in comparison to the existing site.

#### 3 Neutral:

- existing trees should be retained;
  - query whether improved boundary treatments be installed;
  - query whether parking spaces for elderly residents of Lakeland House be provided;
  - preference for B&M;
  - the proposal will be of benefit to those who do not drive;
- larger car park required for safety (parking for nearby schools etc).

### **ASSESSMENT**

The main issues relevant to the assessment of this application are as follows:

- Principle of the Development
- Design
- Impact on Neighbouring Residential Amenity
- Parking, Highway Safety and Traffic Generation
- Ecological Impact
- Air Quality
- Other Matters

#### Principle of the Development

Local Plan policy TC2 states that within the town centres, new retail development should be located as a first preference in the retail areas defined on the Policies Map. Where suitable sites are not available in the retail areas, sites on the edge of the retail areas will be considered and, if no suitable sites are available in any of the preferred locations, out-of-centre sites will be considered.

The site is 'out of centre' and therefore in order to comply with the requirements of Local Plan Policy TC2 (Directing Retail Development) has to be accompanied by a satisfactory Sequential Assessment and a Retail Impact Assessment. These are necessary in order to satisfy the Council that the proposal has assessed / appropriately discounted any sequentially preferential alternatives and that the

proposal will not have any significant adverse impact on planned investment / town and local centre vitality and viability.

Having reviewed the applicant's submission, Officers are satisfied that the applicant has satisfactorily conducted a sequential analysis. To summarise, the absence of suitable and available sequentially preferential sites will have not changed since the relatively recent appeal decision at The Leamington Retail Park (M and S).

The Council commissioned a Retail Study in 2018 (Warwick District Council Retail and Leisure Study 2018, Carter Jonas) which identifies limited retail (convenience capacity) in the short to medium term. It could be considered that the proposal would make a qualitative as well as a quantitative addition to convenience food offer in the District.

The application has to demonstrate that it will not have a significant detrimental impact on the vitality and viability of nearby town centres, and Local Centres or be an impediment to planned town centre investment opportunities.

The retail model for Lidl is that of a 'deep discounter'- they sell a more modest range of convenience goods products / lines than the typical larger supermarkets. Notably they do not sell tobacco, newspapers, or individual confectionary items and stocks limited pre-packed fish and meat and individual fruit and vegetable products. This places Lidl in a different market from most independent retailers. The same issues, coupled with the lack of a post office, pharmacy, delicatessen, financial products or other in house facilities mean that the overlap with conventional supermarkets is limited.

It is noted that Lidl stores offer a limited range of non-food items, however these items tend to be 'one-off' specials and the range of goods on offer changes frequently.

Lidl's primary trade is in bulk, not top - up shopping. As a consequence of this, and by virtue of its restricted product range it does not directly compete with town / local centre convenience stores or independent / multiple butchers, bakers and greengrocers. Therefore, Officers are satisfied with the retail impact assessment that has been submitted with the application. It sets out the Lidl retail model and its outputs focus on trade diversion being predominantly focussed on other supermarket concerns (most of which are out of centre) and that none of these impacts would cause businesses to close.

If the application were being recommended for approval, owing to the specific nature of the proposed development, Officers consider it necessary that a condition which reads "the building hereby approved shall be occupied by and trade as a "deep discounter" retailer and for no other purpose, including any other use falling within Class A1 of the Use Classes Order" to ensure that another retailer would not have unrestricted use which may draw trade away from the nearby town and local centres.

## Design

The National Planning Policy Framework (NPPF) places significant weight on ensuring good design which is a key aspect of sustainable development and should positively contribute towards making places better for people. The NPPF states that permission should be refused for development of poor design that fails to take the opportunities available for improving character, the quality of an area and the way it functions. Furthermore, Warwick District Council's Local Plan 2011 - 2029 policy BE1 reinforces the importance of good design stipulated by the NPPF as it requires all development to respect surrounding buildings in terms of scale, height, form and massing. The Local Plan calls for development to be constructed using appropriate materials and seeks to ensure that the appearance of the development and its relationship with the surrounding built and natural environment does not detrimentally impact the character of the local area.

The existing building serving the site is an incongruous, imposing feature within the street scene, being a substantial structure with little design merit, or relationship with its surroundings. The area around the site has a mixture of much smaller scale development, consisting of two storey terrace dwellings of brick and render, with tiled roofs. Opposite to the site is a vehicle repair centre, which is single storey and also of little architectural quality. However, the repair centre is of an appropriate design for its purpose and being single storey, does not have a significant impact on the street scene.

The design of the proposed building appears as a modern single storey structure, with a mono-pitched roof, large glazed elements and metal cladding, which is similar to the design of other existing Lidl's. Whilst the design would not necessarily directly relate to other development within the street scene, the existing building is already a stark contrast to the established character of the area, which is also relatively varied along Emscote Road and behind to Pickard Street. The modern, simple design would sit comfortably within the mixed street scene and would not appear out of keeping. The design style which Lidl adopts is recognisable and appropriate for its purpose. Although taller than a traditional single storey structure, owing to the angled design, it would sit more comfortably opposite the single storey vehicle repair shop facing to the site.

The proposed development will also move the building on the site slightly further back than the current structure and will provide a modern replacement which is of a substantially smaller scale than the existing development. The footprint and overall height of the building would be far smaller than the existing building, thus reducing the impression of the built form within the street scene. By setting the proposed building further back and also introducing more soft landscaping at the front of the site, this softens the existing harsh solid frontage and provides an improvement to the street scene.

There has been concern raised regarding the loss of four trees which currently occupy the central portion of the car parking area. It must be highlighted that these are not protected by a TPO or within a Conservation Area so could be removed at any time lawfully by the applicant. WCC Landscape has requested that these be retained. However, the agent informed Officers that there is a gas

easement across the car park and this is why there is no planting proposed in the centre of the site. Lidl have taken legal advice in respect of this matter and have been advised that it will be inappropriate to reintroduce trees here as they will likely have to be removed again in the near future. The applicant has however proposed replacement tree planting at the side and rear of the site and increased soft landscaping across the site as mentioned above, accommodating all other requests from WCC Landscape. Whilst the loss of the trees in the centre of the site is regrettable, owing to the constraints across the site and pressure this is likely to have on their removal regardless of the outcome of this application, the fact that the trees have no statutory protection and could be removed at any time, and overall improvements that the proposal would bring to the site in visual terms, the loss of the trees is considered to be adequately mitigated by the redevelopment of the site as a whole.

Therefore, it is considered that the proposed development would represent an enhancement to the street scene, which harmonises well with the character of the area. The development is therefore considered to be in accordance with Local Plan policy BE1.

#### Impact on Neighbouring Residential Amenity

Warwick District Local Plan policy BE3 requires all development to have an acceptable impact on the amenity of nearby users or residents and to provide acceptable standards of amenity for future users or occupiers of the development. There is a responsibility for development not to cause undue disturbance or intrusion for nearby users in the form of loss of privacy, loss of daylight, or create visual intrusion.

Members of the public raise concerns regarding noise nuisances from the construction works, HGV deliveries and refrigeration / plant equipment, and increased vehicular movements in the parking area.

As detailed above, the proposed building would be significantly smaller than the existing property and therefore visually, the development is likely to improve outlook and light to neighbouring properties. There are no proposed windows within the building which would lead to a loss of privacy to neighbouring properties.

Environmental Protection were consulted and have requested that a condition is added to ensure that noise emanating from plant equipment at the site does not detrimentally impact on neighbouring residential amenity, and a condition for a construction management plan to ensure that construction and demolition works did not detrimentally impact on neighbours. They also request a condition limiting the hours of deliveries and a condition for a detailed lighting scheme in order to protect neighbouring amenity.

If the application were being approved, these conditions are considered to be reasonable and necessary to ensure that neighbouring residential amenity is protected.

The proposal is therefore considered to be in accordance with Local Plan policy BE3.

### Highway Safety and Traffic Generation

Local Plan policy TR2 states that all large-scale developments that result in the generation of significant traffic movements should be supported by a Transport Assessment, and where necessary a Travel Plan, to demonstrate the practical and effective measures to be taken to avoid the adverse impacts of traffic.

Members of the public have raised concerns regarding traffic congestion and highway safety. Members of the public also express concern regarding the access for emergency vehicles, and that there would be a detrimental impact on highway and pedestrian safety. However, supporters of the proposal state that the development is likely to ease traffic congestion.

The access to the site would be slightly amended at the entrance, to accommodate parking spaces. WCC Highways have raised no concerns regarding the proposed access arrangements, or in respect to highway or pedestrian safety.

WCC Highways have objected to the proposed development. In their initial comments, WCC Highways noted that the applicants Transport Assessment and Travel Plan highlighted that the proposal would result in excess of 100 extra trips in comparison to the existing use at peak times. WCC Highways confirmed that the highway network in this location (Emscote Road / Pickard Street junction) suffers from severe congestion at peak times and they determined that insufficient consideration had been given to the surrounding highway network. WCC Highways therefore advised that, as the proposal may have an adverse impact on the highway network, paramics modelling was required. The paramics modelling details were agreed by the applicant and WCC Highways, and then undertaken.

The applicant's assessment of the impacts identifies that there would be a relatively minor highway impact. However, the information submitted by the applicant has been assessed by WCC Highways who disagree with this assessment and consider that upon detailed assessment of the data, there would be *severe* levels of delay resulting from additional trips to the site, which would significantly increase journey times.

This analysis is strongly contested by the applicant. The applicants have raised concern regarding the agreed paramics modelling and increase in trip rates, which highlight the impact on the highway network. The applicant believes that standard TRICS data should be used for the paramics modelling, whereas

Whilst the applicant disagrees with the paramics data used for assessing the increase in trips rates (although the data was previously agreed by the applicant) and associated impact on congestion, WCC Highways have identified a lack of capacity for the highway network to cope with the additional trip generation, based on up-to-date, representative data from existing discount food stores within Warwickshire. Emscote Road already suffers from significant congestion, and the modelling tools utilised to assess the development indicate the introduction of



these additional demands will have a severe impact on the network. The issue of additional congestion would be most severe from between 6:00pm to 7:00pm in the weekday PM peak period, however it is noted that during the AM peak period, or in the Saturday peaks there would be no increased delays. Any severe impact on the highway network is unacceptable.

For these reasons, it is considered that the proposal would result in the generation of significant traffic movements, leading to significant delays and further congestion along a route which already experiences a high level of congestion. Inadequate measures have been proposed which could mitigate the adverse impacts of such additional traffic generation and congestion. The proposal is therefore considered to be contrary to Local Plan policy TR2.

### Parking

Members of the public raise concern regarding the impact of the development on nearby residents' parking, which already experiences severe parking stress. Members of the public note that Homebase currently allows parents to park in the car park when dropping off children to Coten End School and employees of nearby businesses, which would be dispersed into the highway. Members of the public have also queried whether parking spaces for elderly residents of Lakeland House can be provided.

There are currently 104 car parking spaces provided, which would be reduced to 97. The existing parking requirement in accordance with today's adopted standards would be 259 spaces and the proposal requires 162 spaces. The net reduction in the number of required spaces is 97 spaces, however, this is still an under provision of 65 spaces for the proposed development.

The Council's Vehicle Parking Standards guidance does allow for flexibility in the application of the standards to specific development proposals and paras 4.7 to 4.10 of the document outline the occasions when strict adherence may not be required. The applicant proposes that they meet criterion 5, where "the development will generate significantly less parking than prescribed in the standard". They suggest that this is because a discount retailer with fewer lines than an open A1 retailer tends to produce significantly shorter dwell times within the store. The applicant informs that typically, the average length of stay of a Lidl customer is between 20 and 25 minutes. The applicant states that it is length of stay that has a particularly burdensome effect on the demand for parking.

The applicant has provided information in relation the parking demands at the existing Lidl store in Warwick. This identifies that the maximum parking demand would be 55 during the weekday peak period (midday) and 66 spaces during the weekend peak period (11:00-12:00) which is below the proposed 97 car parking spaces provided. However, WCC Highways consider that the information provided by the applicant in regards to parking is based on an accumulation survey, which is informed by inaccurate trip rate data as outlined above. This does not take account of the agreed paramics modelling trip data, which shows a higher level of trip rates than that which the applicant proposes. Therefore, WCC Highways do not agree that the parking demands provided by the applicant are accurate. During

the surveys WCC Highways took of the 9 discount retailer sites, 4 of them had 100% occupancy, two sites had 90% occupancy, 2 sites had an occupancy of 80% and 1 site had an occupancy of below 80%. WCC Highways consider that this data is a more robust data to calculate parking occupancy rates and that it highlights the need to assess the circumstances of all of the sites when informing trip rates and parking demands.

The car park estimation presented by the developer assumes a maximum occupancy of 97 vehicles (or 100% of the proposed spaces) using data from WCC Highways, and suggests that using their data 66 spaces would be occupied at the peak times. However, as occupancy is calculated with trips during regular months, a buffer should also be provided for calculating capacity in relation to future trips and irregular months, such as days when the demand could be higher (e.g. Christmas), which has not been provided. The data provided by WCC Highways suggests much higher occupancy, of potentially 100% at peak times, leading to vehicles waiting and parking with the nearby public highway.

Although Homebase may currently allow parents of children attending Coten End School to park in their car park, this is an informal arrangement which could cease at any time. It would also be unreasonable for Officers to insist that the applicant provides parking for an unrelated site.

Therefore, the proposal is considered to provide inadequate parking, which could lead to vehicles parking within the limits of the public highway, causing harm to highway safety and inconvenience to road users. The development is considered to be contrary to Local Plan policy TR3 and the Vehicle Parking Standards.

### Ecological Impact

WCC Ecology have assessed the application and note that the development will result in a minor net gain to biodiversity, which is in accordance with the requirements of the NPPF and Local Plan policy NE2. However, WCC Ecology recommend that the applicant considers enhancing the site further due to the limited amount of soft landscaping, suggesting that a green wall would be beneficial. The applicant does not wish to install the green wall and WCC Ecology have no objection to the proposal.

Although a green wall would be favourable, as there would be no net biodiversity loss at the site, it would be unreasonable for Officers to insist on this being provided as part of the application. WCC Ecology recommend that a condition is attached for the provision of a scheme detailing biodiversity enhancements (such as the green wall). However, as WCC Ecology have confirmed that there would be a small net biodiversity gain, which means that the development is policy compliant as proposed, it would be onerous to impose a condition of this nature on the application, if it were to be approved.

Therefore, the development is considered to be in accordance with Local Plan policy NE2.

## Air Quality

Members of the public raise concern regarding increased pollution from additional traffic and building works in an area where there are already high levels of pollution.

The applicant has provided an Air Quality Assessment, which has been assessed by Environmental Protection, who consider the methodology and findings acceptable. The damage costs associated with the impact of the development on air quality have been agreed as £39,609.34. This could be secured by a Section 106 agreement, or the applicant has the opportunity to propose a mitigation scheme of the same value which accords with the Type 3 mitigation requirements of the Council's Air Quality & Planning Supplementary Planning Document. In this instance, the applicant has proposed one rapid electric charging point, two fast charging points and associated cabling to satisfy the requirements, which Environmental Health Officers agree is a comparable value. The applicant is required to provide precise details regarding the points, which could be suitably conditioned if the application were being approved. A condition would also be required for type 1 (eg. standard electric charging points) and type 2 (eg. use of reasonable endeavours to use vehicles complying with European Emission Standards or a fleet emission strategy) mitigation if the application were approved, which are required as the proposal is for major development.

However, it must be noted that the mitigation measures and damage costs associated with the impact on air quality are based on the Air Quality Assessment provided by the applicant, which is based on the applicant's proposed trip rates. As stated above, the trip rates are not agreed by Officers. The damage costs and required mitigation would be higher if the trip rates identified by WCC Highways were used for the Air Quality Assessment, and would need to be agreed with Environmental Health Officers in the event that Councillors approve the application.

Subject to suitable mitigation for the impact of the development on air quality, the development would be in accordance with Local Plan policy NE5.

## Other Matters

### *Contaminated Land*

The applicant has undertaken a contamination assessment and ground investigation of the site which has concluded that further investigation is required to adequately characterise the site. Further investigation would include ground gas and VOC monitoring due to the thickness of made ground encountered and the presence of VOCs in the groundwater. As a result, Environmental Protection recommend a condition is imposed to ensure that a site investigation scheme and method statement are provided prior to commencement of works. If the application were to be approved, this condition could be added.

### *Drainage and Water Efficiency*

Members of the public consider that there would be an increased risk of flooding. However, the site is located in Flood Zone 1 with a low risk of flooding. It should also be noted that the proposed building would be smaller than the current property and that additional soft landscaping is proposed in comparison to the existing arrangement.

The Local Lead Flood Authority (LLFA) initially objected to the proposal because the development was not considered to conform with the required standards relating to the discharge of water from the site and it was considered that the calculations of brownfield run off were not applied correctly.

The applicant has provided updated information in line with the LLFA's recommendations and they now have no objection to the proposal, subject to a condition requiring that the development is carried out in accordance with the Flood Risk Assessment and outline drainage strategy provided in support of the application. This is considered reasonable and necessary for the purposes of the development, and could be added if the application were approved. The proposal is therefore considered to be in accordance with Local Plan policy FW2.

A condition could be added for compliance with Local Plan policy FW3 relating to water efficiency.

### *Waste*

Members of the public consider that the proposal would result in additional littering. The applicant would be responsible for their own waste collection arrangements, which are likely to be similar to those at the existing site. Officers have no reason to believe that adequate waste storage and disposal cannot be accommodated by the applicant.

### *Archaeology*

Members of the public consider that the archaeological impact not fully addressed. However, WCC Archaeology have not commented on the application, so it is unlikely that items of archaeological importance would be impacted as a result of the development.

### *BREEAM Requirements*

As the proposal results in the construction of over 1,000sqm of non-residential floorspace, a pre-assessment stage assessment by an accredited BREEAM assessor demonstrating how the development will be designed and constructed to achieve a minimum BREEAM standard 'very good' is required. This was provided by the applicant which confirms that the development could meet 'very good' BREEAM standard required. A condition could be imposed for the requirement of additional information relating to the design stage and to ensure that the development was carried out in accordance with the details submitted if the application was being approved.

## *Miscellaneous*

Members of the public consider that there is economic disadvantage for the remaining local confectionery/tobacco/newsagent shops as the area is already served by Tesco and Sainsburys and the proposal is not needed. They also object on the basis of the loss of a home / DIY store and state that there is a preference for alternative retailer such as B&M. However, this preference does not represent a material planning consideration so cannot be assessed as part of this application.

Members of the public also note that the proposal will increase choice for shoppers, will allow those who cannot travel far to access more services, and that the site is in a convenient place for many people to access. Whilst this may be the case, these matters do not outweigh highway capacity concerns.

A query has been raised whether improved boundary treatments be installed as part of the proposal. However, this is not reasonable or necessary for the purposes of the development.

## **Conclusion**

The proposed development is likely to result in the generation of significant traffic movements, which would lead to significant delays and further congestion along a route which already experiences a high level of congestion. Inadequate measures have been proposed which could not mitigate the adverse impacts of such additional traffic generation and congestion. Furthermore, it is considered that inadequate parking is provided in order to serve the development, which could lead to increase demands on nearby residents parking, leading to parking stress and a detrimental impact on neighbouring amenity. The proposal is therefore considered to be contrary to Local Plan policies TR2, TR3 and BE3.

## **REFUSAL REASONS**

- 1 Local Plan policy TR2 states that all large-scale developments that result in the generation of significant traffic movements should be supported by a Transport Assessment, and where necessary a Travel Plan, to demonstrate the practical and effective measures to be taken to avoid the adverse impacts of traffic.

The information submitted indicates that there would be severe levels of delay resulting from additional trips to the site, significantly increasing journey times and adding to existing highway congestion. There is a lack of capacity for the existing highway network to cope with the additional trip generation. The measures proposed are considered to be inadequate and would not mitigate the adverse impacts of additional traffic generated as a result of the proposed development.

The proposal is therefore considered to be contrary to the  
aforementioned policy.

- 2 Policy TR3 states that development will only be permitted which makes provision for parking. Policy BE3 states that development will not be permitted that has an unacceptable adverse impact on the amenity of nearby uses and residents.

The development has an under-provision of car parking by 65 spaces in accordance with the recommendations of the Vehicle Parking Standards. It is considered that it has not been adequately demonstrated that a departure from the standards would not lead to additional vehicles parking within the limits of the public highway. This is likely to cause harm to highway safety and inconvenience to road users.

The development is therefore considered to be contrary to the  
aforementioned policies.

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