PLANNING APPLICATION NUMBER: P09/1506

Type of approval sought	FULL PLANNING PERMISSION					
Ward	BRIERLEY HILL					
Applicant	MR S. J. CARTWRIGHT - STOURBRIDGE MARTIAL ARTS					
Location:						
UNIT 3, LITTLE COTTAGE STREET, BRIERLEY HILL, DY5 1RG						
Proposal:						
CHANGE OF USE FRENTRANCE DOORS WIT	OM B8 TO MARTIAL ARTS CENTRE (D2), NEW GLAZED TH ACCESS RAMP AND HANDRAILS AND NEW FIRE ESCAPE.					
Recommendation summa	ry:					
REFUSE						

INTRODUCTION

1. This application was deferred from consideration by the Development Control Committee on the 11th January 2010 to allow further negotiation with the applicant regarding the submission of a Transport Statement. This is in order to determine whether the proposed development would result in an increase in trips from the previous use thereby triggering planning obligations towards transport infrastructure improvements and whether there is a sufficient level of off street car parking spaces to meet the needs of the development to prevent highway safety concerns. The outcome of these negotiations will be reported in a pre-committee note. The remainder of the report that follows remains the same as presented to the Development Control Committee on the 11th January 2010 with addition of the pre-committee notes that were presented to this committee.

SITE AND SURROUNDINGS

2. The site measures 0.09 hectares and comprises a vacant warehouse building. The building is located immediately to the south of the recently opened Venture Way and to the east of Mill Street. The site lies within a row of three warehouse units, with unit 1 being occupied by a Dulux Decorator Centre, unit 2 as a children's soft play area and the application site, which is currently vacant. Immediately adjoining the western boundary of the site is The Polars Health Centre. The site is located within a mixed use commercial area.

PROPOSAL

- 3. The proposal seeks the change of use of the warehouse (B8) to a Martial Arts Centre (D2) with new glazed entrance doors, access ramp, handrails and fire escape. The unit would also be used for ancillary activities such as massage and therapies. It is proposed that the Martial Arts Centre would be open 1745-2115 Mondays to Fridays, 0945-1230 on Saturdays and with lunch time sessions being held between 1000-1200 Tues-Thurs. The building would not be open on Sundays or Bank Holidays.
- 4. The applicant has indicated that he anticipates that the average class attendance would be between 12-15 persons with a maximum of 20 persons per class being allowed. The proposed change of use would provide employment for 4 full time workers and 6 park time employees. The unit has 23 dedicated car parking spaces.
- 5. The application is accompanied by a design & access statement and a supporting statement focusing on issues relating to a loss of employment land, transport considerations and sequential test assessment. Two letters of further support have also been provided by the applicant in response to the concerns raised by the highway authority with respect to the proposed development seeking to clarify the intensity and therefore trip generation that would be associated with the proposed development. The points raised are summarised below:
 - The applicant has run his own martial arts classes and centres since 1994 but was required to vacate his previous premises due to the lease expiring and has been searching for alternative premises since 2006.
 - The search for a new premises has proven difficult and is restricted by cost with the applicant seeking an annual rent of £12,000 to £15,000 and a floor area of 5000-7000 sq. ft.
 - The applicant did not want to use an industrial unit within an industrial estate but sought to use a building within a prime and accessible location.
 - Nine alternative premises have been looked at but were not fit for purpose.
 - The applicant noted that the application site was available 2 years ago but dismissed it at this time since the annual rent was too high (£40,000). Now the unit has been vacant for 4 years, a 50% rent reduction is being offered thereby now making this unit a viable option.

- The letting agents have confirmed that it would not support the sub-division of the unit due to problems with access and fire escapes but the large space would make a good dojo with plenty of space for training.
- The applicant has sought to maximise the use of the space through the addition of a permanent boxing ring for the teaching of full contact techniques for competition fighters, two training mats, a large punch and kick-bag room and a lounge area for parents to watch the progress of their children. It was never the intention of the applicant to acquire such a large unit but due to the reduced rent, the prime location and availability of car parking spaces the premises would meet the needs of the development.
- The unit would hold 20 classes per week with a limit of 20 students in each class resulting in the use of the unit by 400 students per week. Most students train twice per week, which would equate to the gym being used by 200 students.
- Most martial arts clubs run a 65% children's membership and a 35% adult membership therefore equating to 130 child members and 70 adult members.
 The adult membership would include free use of the kick-bag room.
- The applicant would also provide private tuition during the daytime on a one-toone basis twice a day.
- Gradings are carried out 4 times a year at 3 monthly intervals with the average attendance for each grading being about one third (66 students) of the school.
- The centre would include a seminar held twice a year with a guest speaker and one of the current champions for advice and technique display. Average attendance would again be one third (66 students) of the school.
- The centre would also include the supply and selling of training accessories, clothing and safety equipment.
- During the day the centre would hold yoga and stretching classes for the elderly.
- The applicant does not intend to sub-let any parts of the building.
- 6. In light of the above the applicant's agent states that given the extensive experience of his client in practicing and operating martial arts centres that he has a full understanding of the parking requirements for his customers and his business and refers the Local Planning Authority to paragraph 51 of PPG13 which states that:

'In developing and implementing policies on parking, local authorities should:

- 2. not require developers to provide more spaces than they themselves wish...
- 7. The applicant's agent has confirmed that the applicant would be willing to accept a condition to restrict the unit for the use of a martial arts centre only and given this and paragraph 51 of PPG13 does not consider that a recommendation for refusal is justified based on the absence of a Transport Statement.

HISTORY

Unit 3

APPLICATION No.	PROPOSAL	DECISION	DATE	
83/50380	Erection of two factory units.	Approved with conditions	10/03/83	
83/50379	Warehouse incorporating retail sales counter.	Approved with conditions	10/03/83	
84/52102	Erection of warehouse building	Approved with conditions	04/04/85	
85/50253	Warehouse with small retail counter for sports equipment	Approved with conditions	04/04/85	
85/50786	Part change of use of building from wholesale warehouse to warehouse with retail sales	Approved with conditions	20/06/85	
87/51712	Erection of warehouse with retail outlet	Approved with conditions	10/12/87	
99/51042	Change of use from warehouse/retail to workshop	Approved with conditions	09/09/99	
P07/2341	Change of use from workshop to retail (A1) with new shop front and installation of roller shutters	Refused Dismissed at Appeal.	13/03/08	
P09/0289	Change of use from B8 (storage and distribution) to D2 (assembly and leisure)	Withdrawn	26/05/09	

8. The previous application for the change of use of the application site to D2 use was withdrawn as the applicant at the time was no longer interested in occupying the unit for D2 purposes. This application (P09/0289) sought to occupy the unit as an indoor skate

park. The application site is safeguarded for employment land use under Policy EE3 of the Adopted Dudley Unitary Development Plan (2005). Policy EE3 states that planning permission will not be granted to redevelop such sites for another use which are currently in employment use except where, amongst other things, the applicant can demonstrate that there is no longer any demand to use the site for employment purposes.

9. Information was submitted in support of this application demonstrating that the premises had been marketed since September 2005 as a modern warehouse/industrial unit, without any follow-up interest following initial enquiries. Marketing the site for over three and a half years was considered a reasonable length of time to bring the site to the attention of would be occupants or developers to occupy the building for employment purposes. It was considered that the outcome of the marketing exercise reflected current market conditions and a lack of market demand. On this basis, it was considered that it had been successfully demonstrated that there was no demand for warehouse use of the premises and as such that the alternative use to D2 was appropriate within the context of Policy EE3 of the Adopted Dudley Unitary Development Plan (2005).

Unit 2

APPLICATION No.	PROPOSAL		DECISION	DATE
P01/1377	Change of use from storage/warehouse to indoor children's play area (Unit 2)	with	1	0/08/01
P05/2103	Renewal of expired planning permission P01/1377 to continue use as indoor children's play area.	with		8/11/05

10. Temporary planning permission was originally granted for the indoor children's play area due to the potential impacts of the proposed development upon the implementation of the parallel route. The parallel route is now complete and fully operational. No objection was raised to the principle of the proposed change of use on policy grounds due to the close proximity of the site to Brierley Hill town centre and no objections were raised to the development on highway grounds. The current application for unit 3 would fall within the same use class as the indoor children's play area (D2).

PUBLIC CONSULTATION

- 11. The application was advertised by way of neighbour notification letters being sent to the occupiers of seventeen properties within close proximity to the application site. The latest date for comments was the 7th December 2009. At the time of writing the report two emails have been received from ward councillors in support of the proposed development with the comments summarised as below:
- 12. The use of this building for a Martial Arts Business would seem to be in line with the future proposals for this area of Brierley Hill in the Area Action Plan. It would be more appropriate than its current designated usage for storage and distribution which has the potential to create day long traffic from lorries etc. I understand that Highways Department may have concerns about parking but as the unit has its own designated spaces and is likely to be used mainly in the evening for classes that cover set periods of time I cannot see that this usage would cause any more disruption than its original intended use.
 - 13. The evening use of the units would probably be welcomed by local residents because it would deter some of the anti-social behaviour that we have had from cars gathering in the area once businesses are closed. The units have been empty for some time and I am concerned that if we deter the opening of a new business, in the current economic climate, it may be some time before there is further interest and this will in turn might damage the viability of the other businesses in that block.
 - 14. This is a large unit and I do appreciate the concern that it is of a larger size than buildings used by comparative businesses in the Borough. However, provided that Mr Cartwright abides by the development control restrictions on usage and opening hours I do not see that this can be a substantive reason for refusal. At the end of the day the risk around the viability of any business lies with the business owner and it is not in the remit of the council to judge the commercial efficacy of any business application.
 - 15. In conclusion please would you record our support for this application.

OTHER CONSULTATION

16. Group Engineer (Development): Recommend refusal on the basis that in the absence of a Transport Statement that it is not possible to assess the potential impact of the scheme on the highway network or to determine whether the proposed development would trigger an increase in trips from the previous use to trigger a contribution towards transport infrastructure improvements.

- 17. Group Engineer (Development) has considered the additional supporting information submitted by the applicant and his agent. In response to this information as set out within the proposal section of this report, Group Engineer (Development) states that the reference to paragraph 51 of PPG13 have been taken out of context since the second bullet point to paragraph 51 goes on to state that this only applies where there would not be significant safety implications of providing a lack of off street car parking provision. Group Engineer (Development) considers that until the facts have been extracted via a Transport Assessment that the application has not been supported with sufficient information to advise whether or not the development would result in highway safety concerns due to a lack of parking provision. Group Engineer (Development) sets out below the legislative requirement for the submission of a Transport Statement:
 - Dudley Council planning obligation SPD page 52 D2 fitness Club / leisure centre states a TA and Travel Plan is required.
 - Communities and Local Government, Department for Transport guidance on Transport Assessments March 2007 appendix B threshold for TAs Page 48 D2 use. For development greater than 1,500 sq.m a TA and Travel Plan is required.
 - 18. The above document goes onto mention paragraph 3.3 page 14 air quality management areas and existing land uses in the vicinity of the site including development plan allocation or potential future use in the case of undeveloped (not completed) sites that in this instance will include the Lift and College developments.
 - 19. PPG 13 par 89 requires Travel Plans to be submitted along side planning applications, the whole of Dudley is an air quality management area for nitrogen dioxide.
 - 20. PPG 13 par 51 the whole of this paragraph has relevance and not just the part that suits the Agents purpose. The above requires the applicant to produce a TA. To aide the consideration of this application, Group Engineer (Development) has tried to be helpful and asked for a transport statement, a lesser document that would save time and obviously money but these requests have not been positively received which is

unfortunate. Despite the submission of further information, the recommendation for refusal retained.

- 21. <u>Head of Environmental Health and Trading Standards</u>: The proposed development is not situated in close proximity to residential dwellings and is unlikely to cause a loss of amenity to local residents. As such; no adverse comments to the proposed development.
- 22. British Waterways: No objection to the proposed development.

RELEVANT PLANNING POLICY

Unitary Development Plan

DD1 Urban Design

DD7 Planning Obligations

DD6 Access and Transport Infrastructure

AM14 Parking

AM15 Personal Mobility

CR9 Edge-Of-Centre and Out-of-Centre Development

- 23. The site is not designated for any particular use within the Adopted Dudley Unitary Development Plan (2005).
 - Local Development Framework

Brierley Hill Area Action Plan - Preferred Options

Brierley Hill Area Action Plan - Policy Development Update

Parking Standards and Travel Plans SPD

Planning Obligations SPD

Regional Spatial Strategy

QE3 Creating a high quality built environment for all

PA11A Strategic Centres in the Black Country

National Planning Guidance

PPS6 Planning for Town Centres

ASSESSMENT

Key Issues

- Principle
- Changes to Elevations
- Traffic Generation/Parking
- Planning Obligations

Principle

- 24. Policy EE3 of the Adopted Dudley Unitary Development (2005) seeks to protect existing employment sites from changes of use to non employment uses in the interests of retaining a balanced portfolio of employment land across the Borough. However, where it can be demonstrated that there is no demand to retain an existing site in employment use Policy EE3 would support the granting of planning permission to an alternative use subject to all other policy requirements having been met. The previous proposal for the change of use of this unit to a D2 use has already successfully demonstrated that there was no demand for warehouse use of the premises and as such that the alternative use to D2 was appropriate within the context of Policy EE3 of the Adopted Dudley Unitary Development Plan (2005). In addition, the adjoining unit (2) is already in D2 use.
- 25. In accordance with Policy CR9 of the Adopted Dudley Unitary Development Plan (2005) and PPS6 since the proposed development would constitute leisure development in an out of town centre location in the context of the Adopted Dudley Unitary Development Plan (2005), the proposed development should demonstrate that there is a need for the development and that there are no available and suitable sites available within a town centre location (sequential test)
- 26. However, Brierley Hill is now designated as the strategic town centre for the Borough by Policy PA11A of the West Midlands Regional Spatial Strategy (January 2008). In the context of the emerging policy framework, it is likely that non retail uses would represent a significant element in land use terms of the town centre. In particular, the preferred spatial strategy provides capacity for 37,600 m² of D2 assembly and leisure uses within the newly defined strategic town centre.

- 27. Despite the emerging planning policy context, the applicant has submitted a supporting statement with the planning application submission illustrating that there is a need for the development in the form of members of the local community expressing a need for a children's martial arts school in the locality and it has been successfully demonstrated that there are no other available or suitable sites available within the existing Brierley Hill town centre boundary as defined by the Adopted Dudley Unitary Development Plan (2005). In light of this, the proposed change of use of the application site from employment use to a martial arts centre (D2) would be in accordance with Policy CR9 of the Adopted Dudley Unitary Development Plan (2005) and PPS6.
- 28. The designation of Brierley Hill as the strategic centre within the Borough by Policy PA11a of the West Midlands Regional Spatial Strategy (January 2008) has by default supported the principle of expanding both retail and leisure uses within this area. The emerging Brierley Hill Area Action Plan specifically supports the addition of an additional 37,600m2 of D2 assembly and leisure uses within the newly defined strategic town centre. Therefore, the proposed development would be in accordance with the long term strategic aspirations for the expansion and development of Brierley Hill being in accordance with Policy PA11a of the West Midlands Regional Spatial Strategy (January 2008) and the emerging Brierley Hill Area Action Plan.

Changes to Elevations

- 29. The existing front (north east) elevation of the building comprises two blue powder coated roller shutter doors. The proposed development would result in the removal of one of the roller shutter doors on this front elevation and its replacement with a set of double glazed entrance doors with an associated ramped access. The addition of the new entrance doors would improve the visual appearance of the building in terms of enhancing the legibility of the building as its faces Venture Way thereby being in accordance with Policy DD1 of the Adopted Dudley Unitary Development Plan (2005).
- 30. The general design of the proposed access ramp would allow ease of access into the building for those with impaired mobility and subject to a condition requiring approval of the gradient of the proposed ramp, the handrail design, the surface treatment of the ramp and the colour of the frame of the new glazed entrance doors the proposed development would be in accordance with Policy AM15 of the Adopted Dudley Unitary Development Plan (2005).

31. The design and appearance of the proposed external staircase to form a fire escape for the proposed development would be sited on the north-east elevation of the building and would be set back 19 metres from the front elevation of the building. The proposed siting of the fire escape would ensure that it would not form an obtrusive feature in the street scene and would not detract from the visual appearance of the area thereby being in accordance with Policy DD1 of the Adopted Dudley Unitary Development Plan (2005).

Traffic Generation/Parking

- 32. The Adopted Parking Standards and Travel Plan SPD would require the provision of between 47 and 55 off street car parking spaces for a proposed D2 where there is high accessibility. The unit has 23 designated spaces and there are 24 spaces plus 2 disabled spaces available as shared spaces located to the front of the unit. The total car parking capacity of the site is therefore 47 spaces. In addition to on-site parking, the unit is within 100 metres of a pay-and-display car park on Little Cottage Street, which provides some 70 spaces plus 6 disabled spaces. On this basis, the site could appear to have a sufficient level of off street parking provision to meet the needs of the proposed development thereby being in accordance with Policy AM14 of the Adopted Dudley Unitary Development Plan (2005) and the Parking Standards and Travel Plans SPD.
- 33. However, concern concern is raised regarding the availability of car parking spaces for the application site and the two other units following the consideration of the previous scheme for the change of use of the application site into A1 retail. Whereby the appellant's statement in relation to this appeal stated that all the spaces for the three units were shared rather than 26 specifically being allocated to the application site as the current submission suggests. If all of the car parking spaces are shared then potentially there are only 18 spaces available for each of the units and in the absence of a Transport Statement Group Engineer (Development) is concerned that unit 3 would not have a sufficient amount of car parking provision to meet the needs of the development.
- 34. The applicant has submitted a supporting statement, which indicates that each class would accommodate 20 people but the gross floor area of the unit measures 1,673 square metres. This would suggest that each student would require 83 square metres of floor space. The application indicates that the martial arts centre would include other ancillary uses such as therapies and massaging but even taking into account these

activities concern is raised that due to the size of the unit that it could significantly intensify as a martial arts centre beyond the nature set out within the planning application forms. The unit itself only has 23 designated off street car parking spaces against a requirement of between 47 and 55 spaces in accordance with the standard for D2 uses as set out within the Parking Standards and Travel Plans SPD. In the absence of a Transport Statement; which is required for a use of this type and nature as set out within the Parking Standards and Travel Plans SPD there is insufficient information submitted in support of the planning application to ascertain the potential impacts of the proposed use upon the highway network, to assess whether the site has a suitable level of on site parking provision or to determine whether the proposed development would result in an increase in trips from the previous use to trigger a contribution towards transport infrastructure improvements. In this regard, the proposed development would be contrary to Policies DD6, DD7 and AM14 of the Adopted Dudley Unitary Development Plan (2005) and the Parking Standards and Travel Plans SPD and Planning Obligations SPD.

Planning Obligations

- 35. The proposed development has a requirement to provide planning obligations to mitigate against the consequential planning loss to the existing community. Should permission be granted a condition would be required to secure on-site nature conservation enhancements.
- 36. The applicant has at the time of writing the report agreed to the implementation of a nature conservation enhancement scheme on site.
- 37. A contribution towards public realm improvements was not required. The Adopted Planning Obligations SPD seeks public realm improvements on site in the case of commercial development. This site is located adjacent to the newly opened Venture Way. This has resulted in the car park associated with the unit being re-surfaced with marked out spaces, the creation of a new access into the site from Venture way and Venture Way itself comprising a number of recently implemented public realm improvements in the form of new paving and street furniture. In addition to this, the scheme would itself incorporate a number of public realm improvements including the removal of an unsightly roller shutter door and its replacement with glazed entrance doors and the addition of railings to the existing steps/ramp providing access to the building. The recently implemented public realm improvements within the site and along

Venture Way and the improvements that would occur to the building as a result of the granting of planning permission would satisfy the requirement for public realm improvements on the site and therefore no additional off site contribution would be sought.

- In the absence of a Transport Statement it has not been possible to determine 38. whether the proposed development would generate an increase in trips from the previous use. An initial assessment, based upon the proposed opening hours and class sizes of the martial arts centre suggests that there will be an average of 3.8 classes each day (Mon-Sat). If you multiply this by 20 (the maximum no. of people that would attend each class) this would equate to 152 trips per day. This could amount to 102 trips less than the previous use. However, the approved Planning Obligation SPD contains accurate trip rate data for different land uses. The current use is B8 commercial storage and based on this data the site generates approximately 62 trips per day. A D2 private gym facility would generate 460 trips per day, an increase of 398 trips per day. Given the increase in the number of trips the approved Planning Obligations SPD would require a planning obligation contribution of £24,572.52 towards off site transport infrastructure improvements. No planning obligations are being proposed to be secured by the proposed development other than on-site nature conservation enhancements. Without a Transport Statement there is a lack of substantiated information submitted forming part of the planning application of sufficient objectivity to define the exact level of trips associated with the proposed business including those ancillary components to determine whether there would be an increase in trips or not from the previous use of the building. In this regard, the proposed development would be contrary to Policy DD7 of the Adopted Dudley Unitary Development Plan (2005) and the Planning Obligations SPD.
- 39. Further, Further, the Group Engineer Development advises that local policy, Planning Obligations Supplementary Planning Document and national guidance, Communities and Local Government, Department for Transport, Guidance on Transport Assessment both require a full Transport Assessment and Travel Plan for D2 developments greater than 1500 sq,m. Comments from Highways development team initially requested a Transport Statement which is less detailed than a Transport Assessment. However, since the proposal is just under 1700 sq.m and to be in accordance with both national guidance and local policies, it is now the view of the

Group Engineer Development that to fully understand the Highway impacts of this development a full transport assessment is required.

- 40. The application as submitted without a Transport Assessment fails to take into account .
 - The existing site information, including existing land uses in the vicinity of the site, including development plan allocations or potential future uses in the case of undeveloped sites, ie, the link project and the college.
 - Air Quality Management Area and Nitrogen Dioxide levels
 - Baseline Transport data
 - The number of trips generated and their modal distribution
 - · Parking facilities
 - Current traffic flows on links and junctions and identify critical points
 - · Summary of transport improvements in the area
 - Identify current peak periods on the road network and traffic flow data to and from the development or in the vicinity of the site
 - Levels of air quality
 - Baseline carbon emissions data for the site, broken down by mode
 - Public Transport Assessment
 - Walking / Cycling Assessment
 - Road Network Assessment
 - Traffic Data and Traffic Forecast
 - Safety Considerations and Accident Analysis
 - Parking Strategy
 - Parking Accumulation
 - Environmental Impact
 - Safety Impact
 - Economic Impact
 - Accessibility
 - Integration
 - Mitigation measures
 - Travel Plan PPG13 Par 89

CONCLUSION

- 41. The site has been marketed for a considerable amount of time for warehouse use (B8) without success and sufficient evidence has been submitted to the Local Planning Authority to demonstrate that it would be acceptable in this case to support the loss of this particular unit from employment to a martial arts centre (D2) thereby being in accordance with Policy EE3 of the Adopted Dudley Unitary Development Plan (2005). Sufficient evidence has been demonstrated to justify the need for the proposed leisure use within what is at present an out of town location and that there are no other more centrally located suitable or available sites for the proposed use in accordance with PPS6 and Policy CR9 of the Adopted Dudley Unitary Development Plan (2005).
- 42. The designation of the site within the Brierley Hill strategic centre by Policy PA11a of the West Midlands Regional Spatial Strategy (January 2008) and the emerging Brierley Hill Area Action Plan supports in principle the expansion of this area for both retail and leisure use in the interests of the regeneration of the area. In light of this, the proposed change of use would be in accordance with the long term strategic aspirations of developing Brierley Hill as the strategic centre for the Borough. In addition, the principle of supporting D2 uses within this area has already been established by the granting of planning permission for the indoor children's play area, which adjoins the site at unit 2.
- 43. Whilst the principle of the proposed change of use could be supported, in the absence of a Transport Statement insufficient information has been submitted as part of the planning application submission to objectively and accurately assess the potential trip generation that could occur from the planning unit as a result of the proposed development and therefore to determine the required level of off street parking provision and whether the scheme would have an adverse impact upon the highway network. In addition, this lack of information means that it would not be possible to determine whether the proposed development would result in a net increase in trips from the previous use to warrant the provision of an off site contribution towards transport infrastructure improvements thereby being contrary to Policies DD6, DD7 and AM14 of the Adopted Dudley Unitary Development Plan (2005) and the Parking Standards and Travel Plans SPD and Planning Obligations SPD.

44. The proposed external alterations to the building as a result of the proposed change of use would improve the visual appearance of the building to the benefit of the character of the area. The unit comprises a sufficient amount of off street car parking to meet the needs of the development and would not raise any highway safety concerns.

RECOMMENDATION

45. It is recommended that the application be refused for the following reasons:

Conditions and/or reasons:

1. In the absence of a Transport Statement insufficient information has been submitted as part of the planning application submission to objectively and accurately assess the potential trip generation that could occur from the planning unit as a result of the proposed development. This lack of information means that it is not possible to determine whether the proposed development would have a sufficient level of off street parking provision to meet the needs of the proposed development, whether the use of the site and its associated trips would have an adverse impact on the highway network or to determine whether the proposed development would result in a net increase in trips from the previous use to trigger a contribution towards transport infrastructure improvements thereby being contrary to Policies DD6, DD7 and AM14 of the Adopted Dudley Unitary Development Plan (2005) and the Parking Standards and Travel Plans SPD and Planning Obligations SPD.

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SUMMON
WOOD / 05.02

REAR ELEVATION facing SOUTH EAST

FRONT ELEVATION facing NORTH WEST

2

Decares SOB U STEPHEN BANKS ASSOCIATES

ARCHTECTURE PLANNING INTERIOR DESIGN PROJECT MANAGEMENT

35 OACHON STREET
SERRIEF HILVEST CANDO
TO BY THE PROPERTY OF T