

TRANSPORT STATEMENT

TO SUPPORT PLANNING APPLICATION FOR CONSTRUCTION OF PART TWO STOREY AND PART SINGLE STOREY ATTACHED DWELLINGHOUSE; PROVISION OF REFUSE / RECYCLING STORAGE, AND AMENITY SPACE

AND

ASSOCIATED ALTERATIONS TO 15 TAYBEN AVENUE; (FOLLOWING DEMOLITION OF EXISTING WORKSHOP / STORAGE TO 15 TAYBEN AVENUE, GARAGE TO 13 TAYBEN AVENUE

AND

RE-POSITION OF BOUNDARY

1. INTRODUCTION

The London Borough of Richmond Upon Thames (the “Council”) Local Validation Checklist requires a **Transport Statement** to be submitted for all planning applications involving 1-9 residential units.

This **Transport Statement** has accordingly been prepared and demonstrates the likely effect of the proposed development on the surrounding local highway network from the site and in particular addresses the following:

1. The existing site, a summary of local on-street parking conditions and the accessibility of the local area,
2. The proposed development, and
3. The effect of the proposed development on the surrounding area and in the context of national, regional and local policies.

Where, in this Statement:

- Measurements are given, they are approximates and in metres.
- Extracts of plans, maps and or drawings are shown, they are not to scale.
- Photographs are shown, they are also not to scale and, unless otherwise stated, are as at 2023.
- Lettering and numbers are in:
 - ‘curved’ brackets, they are drawing numbers of architectural plans.
- Quotations are coloured in:
 - **Brown**, they are text from the quoted caselaw; and
 - **Blue**, they are text from the quoted planning legislation / policy / guidance.

The planning application for the Proposed Development (the “Planning Application”) is essentially an amended submission for the development proposed under planning application 22/3276/FUL (the “Original Planning Application”). The Original Planning Application was refused by the Council on 12.05.2023.

The matter was referred to appeal, under appeal reference APP/L5810/W/23/3332811 (the “Appeal”). The Appeal was assessed by Inspector C Livingstone MA (SocSci) (Hons) MSc MRTPI (the “Inspector”) on 23.07.24. The Inspector dismissed the Appeal on 23.07.2024 (the “Appeal Decision”) because “...*there is no suitable mechanism before me to secure an affordable housing contribution or restrict parking...*”; i.e. no completed Unilateral Undertaking, pursuant to section 106 of the of the Town and Country Planning Act 1990 (as amended) had been provided.

1. PLANNING POLICIES & GUIDANCE

The Applicant understands the following:

- Below legislation / national policy is the London Plan, which forms part of the ‘development plan’.
- The ‘development plan’ contains a set of policies and guidance for development of the borough and the Council’s ‘local plan’ (adopted by the Council on 03.07.2018) (the “Local Plan”) also forms part of this ‘development plan’.
- The legislation provides that planning decisions must be taken in accordance with the ‘development plan’ unless there are material consideration that indicate otherwise.
- The Council’s Local Plan is within the framework of material planning considerations.
- The Council’s Supplementary Planning Documents (“SPD”) provide greater detail on policies.
- The Council have prepared a new ‘local plan’. This was made available for public consultation on 09.06.2023 and this ended on 24.07.24. The Applicant understands that, by submitting the Richmond Publication Version Local Plan (Regulation 19 version) (the “Draft Plan”) for independent examination, the Council has formally confirmed its intention to adopt the Draft Plan and its supporting documents is now a ‘material planning consideration’.

2.A. National / Development & Local Plan Policies

The main development plan policies are as follows:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- Nationally Described Space Standards (2015)
- London Plan Guidance Fire Safety Policy D12(A) Pre-Consultation Draft, March 2021
- Building Regulations
- London Plan 2021
 - Policy D12
 - Policy SI 15 – Water Infrastructure
 - Policy GG 6 – Increasing Efficiency and Resilience
 - Chapter 6 – London’s Transport
- Local Plan
 - Policy LP 1 Local Character and Design Quality
 - Policy LP 2 Building Heights
 - Policy LP 8 Amenity and Living Conditions
 - Policy LP 21 Flood Risk and Sustainable Drainage
 - Policy LP 22 Sustainable Design and Construction
 - Policy LP 34 New Housing
 - Policy LP 35 Housing Mix and Standards
 - Policy LP 36 Affordable Housing
 - Policy LP 37 Housing Needs of Different Groups
 - Policy LP 39 Infill, Backland and Backgarden Development
 - Policy LP 45 Parking standards and servicing

2.B. LBRUT’s Supplementary Planning Documents / Guidance

The main SPDs are as follows:

- House Extensions and External Alterations SPD (2015) (“HEAEA SPD”)
- Residential Development Standards SPD (2010) (“RDS SPD”)
- Sustainability Construction Checklist SPD (2011) (SCC SPD”)
- Design Quality SPD (2006) (“DQ SPD”)
- Planning Obligations SPD (2014) (“PO SPD”)

- Affordable Housing SPD (2014) (“AH SPD”)
- Refuse and Recycling Storage Requirements SPD (2015) (“RARSR SPD”)
- Front and Other Off-Street Parking Standards (2006) (“FAOOSPS SPD”)

2.C. POLICY

Policy LP 45 provides that the Council will require new development to make provision for the accommodation of vehicles. The policy goes on to require that new development provide for car and cycle in accordance with the standards set out in Appendix 3 to the Local Plan.

2.C.(i) *Parking Standards*

Paragraph 11.2.2 of LP 45 states this policy covers the parking standards for new developments, of all types. The Council’s Supplementary Planning Document (SPD) further provides additional guidance on Local Plan Policies related to roads and transport, detailing the expectations for planning applications.

An extract of the parking and cycling standards as set out in the said Appendix is as follows:

STANDARD LAND USE	PARKING STANDARD	CYCLE PARKING STANDARD
RESIDENTIAL (including conversion/extension of existing)		
	PTALs 0-3: 1- 2 bedrooms, 1 space	As per London Plan
	PTALs 0-3: 3+ bedrooms, 2 spaces	As per London Plan

Paragraph 8.2 of the Council’s SPD states the Council has adopted London Plan standards for cycle parking.

Paragraph 8.3 of the said SPD states that the London Cycling Design Standards provide guidance on appropriate designs for cycle parking, and this guidance should be reflected in proposals. Plans clearly showing the location, spacing and access for the proposed cycle parking should be included with the planning application. Cycle parking for inclusive cycles, cargo bikes and tricycles should be provided and clearly labelled on plans.

An extract of the cycling standard as set out in Chapter six, London’s Transport, London Plan is as follows:

LAND USE		LONG STAY
C3-C4	dwellings (all)	1 space per studio and 1 bedroom unit 2 spaces per all other dwellings

Paragraph 11.1 of the SPD states that the Council has adopted the London Plan standards for car parking but an appropriate balance needs to be struck between minimising car use and ensuring development is able to operate efficiently, avoiding adding to street parking pressure.

Paragraph 11.2.3 of LP 45 therefore states that developers may only provide fewer parking spaces, including car free schemes, if they can demonstrate as part of a Transport Statement or Transport

Assessment with supporting survey information and technical assessment that there would be no unacceptable adverse impact on on-street parking availability, amenity, street scene, road safety or emergency access in the surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the vicinity. In general it is expected that in PTAL areas of 0-3 the standards should be met.

Paragraph 11.1.2 of LP 45 states that in areas controlled by a Community Parking Zone; occupiers of new residential developments may not be eligible for resident or visitor on-street parking permits where existing levels of on-street parking are very high. This restriction would be secured by excluding the address from the schedule of streets in the relevant road traffic order that created or creates the Controlled Parking Zone in which the property is situated, by restricting under section 106 of the Town and Country Planning Act 1990 the disposal of an interest in relevant properties unless a person disposing advises the person acquiring of the non-availability of residents or business on-street parking permits and/or through Section 16 of the Greater London Council (General Powers) Act 1974 (or any statute revoking or re-enacting that Act).

Paragraph 3.3 of the SPD expands on this by explaining that where residential development has the potential to result in an increased demand for on street parking, an application may need to be supported by a parking survey. Where 85% or more local street parking spaces are occupied at night, it may be necessary to exclude any permitted development from eligibility for street parking permits.

2.C.(ii) Off-Street Parking

Paragraph 12.4 of the Council's SPD provides that where a parking space is provided off the street, it should be designed in accordance with best practice set out in the Appendix to this report.

Paragraph 5.4 of the Council's SPD states that on non-classified roads, the garden must be able to accommodate a car parked at 90 degrees to the footway and the car-standing area must be a minimum size of 2.4m wide and 5m long, with a further clearance of at least 1m to the front of the property (taking account of any bay windows). The parking space should not be sited in front of the main door to the house, although it may be acceptable where a minimum of 1.0m can be provided between the parking area and the front door. This will maintain access to the building for all pedestrians, people with disabilities and in case of emergencies.

2.C.(iii) Accessibility

Paragraph 11.2.5 of LP 45 and paragraph 9.1 of the Council's SPD provides that car share facilities and car clubs will be encouraged.

2.C.(iv) Infrastructure

Paragraph 10.1 of the Council's SPD states Richmond is predicated to have a rapid take up of electric vehicles, requiring a commensurate supply of charging infrastructure. Development should make provision for 100% active electric vehicle parking. This does not mean that every parking space needs to be equipped with a charging point, as one fast or rapid charging point may cater for many vehicles. Developers should demonstrate that the development would be able to operate satisfactorily in the future expectation of all vehicles being electrically powered.

Paragraph 11.2.5 of LP 45 states that charging facilities for electric vehicles will have to be provided in line with the standards set out in the London Plan, which requires 20% active provision (i.e. fully installed from the outset) plus 20% passive provision (i.e. cabling provided for easier future installation of charging equipment) in residential developments, and 10% active provision plus 10% passive provision in all other developments.

2. FINDINGS

3.A. Site Location and Surrounding Area

The site is located at the end of Tayben Avenue, south of the B361 Whitton Road and north of the A316 Chertsey Road.

The surrounding areas of Tayben Avenue, Chudleigh Road, Whitton Road and associated roads are residential in nature with a mixture of flats and low rise semi-detached and detached properties with the usual garages, sheds, garden rooms and single and double storey extensions.

The closest amenities in proximity to the site are located in Whitton Road, approximately 0.3km to the South East of the site (served by a cafe, laundrette, Chinese take-away and the typical corner shops). A number of further local amenities are located within a 0.8km radius of the site including a large number of retail shops along the A310 London Road. Richmond-upon-Thames College is located approximately 300m south of the site, whilst Twickenham Stadium is located 150m north of the site. Chase Bridge Primary School is next to the Stadium and Twickenham railway station is located 900m south of the site.

The site is within the Ward of St. Margarets and North Twickenham of the London Borough of Richmond Upon Thames and is not located within a Conservation Area.

3.A.(i) *Tayben Avenue*

Tayben Avenue borders the Southern boundary of the site and currently provides the vehicle access point.

Pedestrian access to the site is also afforded off Tayben Avenue.

Tayben Avenue is a no-through road for vehicles, but links to the B361 Whitton Road to the north and connects with close proximity to the A316 Chertsey Road. It also links to Twickenham / Richmond to the South East and Whitton and Hounslow to the West.

Tayben Avenue provides pedestrian and cycle access from the A316 Chertsey Road to the B361 Whitton Road (and its associated roads) and vice versa.

The road operates a mixture of resident permit holder only bays and single and double yellow lines.

Tayben Avenue falls within a Controlled Parking Zone (CPZ). The site falls within Zone R – Twickenham Stadium Event Day Controlled Parking Zone (CPZ) which is in operation on Twickenham Stadium event days. Loading or unloading is permitted when parked in the marked bays at any time throughout the day.

3.A.(ii) Whitton Road

The B361 Whitton Road facilitates a vehicle and pedestrian two-way movement in an east to west orientation north of the site between Whitton Roundabout, to the east, and Warren Road, to the west. As mentioned above, Whitton Road links to all Richmond, Twickenham, Whitton and Hounslow.

In the vicinity of the site, Whitton Road has a mixture of single and double yellow lines as well as resident permit parking bays.

3.A.(iii) Application Site

The application site consists of:

- The garage, garden shed and part of the surrounding side land adjoining 13 Tayben Avenue, Twickenham, TW2 7RA, and
- The existing storage / home workshop and part of the surrounding side land adjoining 15 Tayben Avenue, Twickenham, TW2 7RA.

The garage to 13 Tayben Avenue is in poor condition with an approximate internal area of 4.46m x 2.54m up to the existing boundary. The garage is therefore considered not fit for purpose.

The said surrounding land adjoining 13 Tayben Avenue is occupied by a shed, again in poor condition and is again considered not fit for purpose.

The part of the surrounding side land adjoining 15 Tayben Avenue (relating to this application) is used as a storage / home workshop area (for its occupiers) behind the closed wooden double gates, which are in average condition.

The South part of 13 Tayben Avenue abuts an existing dropped kerb / crossover from Tayben Avenue. This gives access to the said garage and hardstanding forecourt within the boundaries of the site.

The South part of 15 Tayben Avenue abuts an existing dropped kerb / crossover from Tayben Avenue. This gives access to the said storage / workshop and large hardstanding forecourt within the boundaries of the site.

The said two existing dropped kerb / crossovers join together without any break.

Existing Parking Arrangements

As shown on the Existing Plans, the site currently accommodates parking facilities as follows:

1. One parking space for one vehicle on the forecourt at 13 Tayben Avenue,
2. Two parking spaces for two vehicles on the hardstanding forecourt at 15 Tayben Avenue.

Both 13 and 15 Tayben Avenue are eligible for on-street parking permits.

The current owners of 13 and 15 Tayben Avenue have a number of residents parking permits and can park vehicles on street.

Given the garage to 13 Tayben Avenue is not fit for purpose and the surrounding land to 15 Tayben Avenue is used as storage / home workshop, there is no loss of off-street parking as a result of the development.

Accessibility by Non-Vehicle Modes

A person's willingness to walk is dependent on many factors including access to a car, safety, road congestion, weather, gradients, parking, health, direction of route and purpose of journey.

Central Government research refers to a distance of 2km as the maximum distance over which walking might replace car trips. Similarly, the Institution of Highways and Transportation (IHT) Guidelines suggest a maximum 'acceptable' walking distance for pedestrians without a mobility impairment of 2km.

The walking environment in the vicinity of the site is of a good standard with footways provided on both sides of Tayben Avenue. The area is residential in nature and footways are situated alongside all local streets. This creates a safe environment for pedestrians.

The site is well connected to the main pedestrian routes that serve public transport facilities and local amenities found on London Road and Whitton Road.

A number of local amenities are located within a 0.3km radius of the site and a large number of retail shops along Whitton Road, which is approximately 0.8km of the site along the A310 London Road. Twickenham Rail Station and reputable cab companies are also within this catchment area.

A footpath connects Tayben Avenue to the A316 Chertsey Road which leads to a pedestrian bridge over the A-road.

Furthermore, a signalised crossing with a refuge island is located 30m east of the site on the A316 Chertsey Road. The crossing is provided with tactile paving, dropped kerbs, pedestrian bollards and green-man facilities.

Twickenham High Street is just 1.6km away from the site and Whitton High Street is also only 1.44km away. Hounslow High Street is also accessible with links to various modes of transport including Bus Stop P (described below).

Accessibility by Vehicles

Car Club

There are at least 17 existing car club vehicles within 1 mile of site, operated by Zipcar; the closest ones are located at March and London Road, which is approximately 0.64km from the site.

Car club operators allow members to book and make use of their fleet of vehicles, negating the need to own a car.

Cycling

Central Government research states that cycling has the potential to substitute for short car trips, particularly those under 5km, and to form part of a longer journey by public transport.

A 5km catchment area encompasses Feltham, Isleworth, Whitton, Twickenham, Richmond, St. Margarets, Teddington and Strawberry Hill.

Near the site, Rugby Road and part of Whitton Dean are designated by TfL as “Routes signed or marked for use by cyclists on a mixture of quiet or busier roads”. In addition, routes surrounding the site including Egerton Road, Chudleigh Road and Kendrey Gardens are designated as “Quieter roads that have been recommended by other cyclists”. In addition a number of off-road cycle routes are located in the vicinity of the site including routes along both sides of Chertsey Road as well as along Mogden Lane.

Low traffic volumes and speeds in the area create a safe environment for cyclists. Cycle stands are currently provided outside Twickenham Rail station.

Local Bus Services

The site is well served by local bus services on Whitton Road. The closest eastbound (Tayben Avenue, Stop B) and westbound bus stop (Tayben Avenue, Stop P) are located on Whitton Road approximately 180m – 200m north west of the site.

A summary of the routes serving these and surrounding stops is presented in the Table below:

Bus Service	Bus Stop Location	Route
281	Warren Road (Stop ‘T’)	Towards Tolworth Tower
681	Warren Road (Stop ‘T’)	Towards Broom Road / Teddington School
281	Warren Road (Stop ‘V’)	Towards Hounslow Bus Station
681	Warren Road (Stop ‘V’)	Towards Hounslow Bus Station
281	Admiral Nelson / Whitton (Stop ‘W’)	Towards Hounslow Bus Station
481	Admiral Nelson / Whitton (Stop ‘W’)	Towards Cromwell Road Bus Station
681	Admiral Nelson / Whitton (Stop ‘W’)	Towards Hounslow Bus Station
H22	Admiral Nelson / Whitton (Stop ‘W’)	Towards Manor Road
481	Kneller Road (Stop ‘S’)	Towards Cromwell Road Bus Station
H22	Kneller Road (Stop ‘S’)	Towards Manor Road
481	Kneller Road	Towards West London Mental Health Trust
H22	Kneller Road	Towards Bell Road / Bell Corner
281	Admiral Nelson / Whitton Stop ‘Q’	Towards Tolworth Tower
481	Admiral Nelson / Whitton Stop ‘Q’	Towards West London Mental Health Trust
681	Admiral Nelson / Whitton Stop ‘Q’	Towards Broom Road / Teddington School
H22	Admiral Nelson / Whitton Stop ‘Q’	Towards Bell Road / Bell Corner

H22	Whitton High Street (Stop 'L')	Towards Bell Road / Bell Corner
H22	Whitton High Street (Stop 'X')	Towards Manor Road
H22	Whitton Station (Stop 'A')	Towards Bell Road / Bell Corner
H22	Whitton Station (Stop 'B')	Towards Manor Road

Rail Services

The nearest rail station is Twickenham which is located approximately 900m south of the site providing access to national rail services. The station (and Whitton Station approx. 144km to the West of the Site) and all trains serving it are operated by South West Trains.

From Twickenham station, it is possible to travel directly to London Waterloo, London Waterloo via Kingston, Reading and Windsor & Eton Riverside, with services operating every 2 – 5 minutes.

Public Transport Accessibility Level (PTAL)

The Public Transport Accessibility Level is a theoretical measure of the accessibility of a given point to the surrounding public transport network, taking into account walk access time and service availability. The method used is essentially a way of measuring the density of the public transport network at a particular point.

The PTAL reflects:

- The walking distance from the point of interest to the public transport access points;
- The reliability of the service modes available;
- The number of services available within the catchment; and
- The level of service at the public transport access points – i.e. average waiting time.

The PTAL is categorised into eight levels, 1a to 6b where 6b represents an excellent level of accessibility and 1a a low level of accessibility.

The PTAL of the site is 3. It is however considered that this is an under-representation of the good accessibility of the site. This is particularly so considering the close proximity to local bus stops, Twickenham Rail Station and the fact that its close siting to Twickenham Stadium results in very good public transport links.

3. PROPOSED DEVELOPMENT

The proposal involves the Proposed and the Proposed Development at the Proposed Site.

The proposal will therefore essentially result in one additional dwelling to the existing.

Each dwelling is to benefit from allocated off street parking and cycle storage, as proposed below.

4.A. Proposed Parking Arrangements

As demonstrated above, a three bed house requires 2 parking spaces and 1 cycle space and a one bedroom house requires 1 parking space and 1 cycle space.

A total of 5 parking spaces and 3 cycle spaces are therefore required as follows:

- 13 Tayben Avenue – 2 x car parking spaces and 1 x cycle space,
- 13A Tayben Avenue – 1 x car parking space and 1 x cycle space, □ 15 Tayben Avenue – 2 x car parking spaces and 1 x cycle space.

The existing 13 Tayben Avenue already benefits from off-street parking and has the right to apply for residents parking permits.

Likewise, the existing 15 Tayben Avenue benefits from off-street parking and also has the right to apply for residents parking permits.

In the circumstances, a total of three off-street parking spaces and two on street parking spaces together with three cycle spaces have been proposed as part of the proposed development as shown on the plans accompanying the application. One on street parking space each for the existing is considered acceptable as there would be no adverse impact on the area in terms of street scene or on-street parking.

If required, the applicant can enter into a s.106 Agreement/Unilateral Undertaking that will restrict resident on street parking permits for the proposed new dwelling. A car-capped development is deemed appropriate for the site owing to its location near a number of local amenities, including Twickenham and Whitton railway station and its accessibility via bus routes/car clubs.

The proposed parking arrangement comprising one parking bay for the new dwelling, and one parking bay each for the existing dwellings together with the restriction of one on-street parking permits for the existing and no parking permits to the proposed dwelling is considered acceptable.

Whilst the parking spaces are not at 90 degrees to the footway, the said three parking spaces will be located as existing. There will therefore be no physical change in relation to parking spaces and therefore no harm will be caused but the physical appearance of the hardstanding front forecourt area of 13 Tayben Avenue will be vastly improved in design and materials, matching 15 Tayben Avenue.

The parking spaces comply with the minimum sizes of 2.4m wide and 5m long, with a further clearance of at least 1m to the front of the property (taking account of any bay windows).

4.B. Proposed Vehicle Access

The existing crossover will remain as existing. Use of the existing dropped kerb/crossover from Tayben Avenue will be retained to serve the above mentioned parking spaces. There will be no need to widen the crossover and therefore there will be no reduction in the existing resident's parking bays. Tayben Avenue will therefore continue to provide the vehicle access point for the proposed development.

Pedestrian and vehicle access to the proposed development will remain from the existing separate entrances from the A316 Chertsey Road and Whitton Road.

4.C. Proposed Pedestrian Access

The proposed development will also create a formal pedestrian footpath from the public footpath on Tayben Avenue to the entrances to the proposed new dwelling.

Effect of the Proposed Development

Trip Generations

The development of the site to create 1 x one bedroom dwelling is likely to result in a slight increase in the number of trips. Any increase is likely to be minimal and will be an insignificant number of vehicle trips over the course of a typical day.

For purposes of assessing the effect of the proposal, as an alternative, it is conceivable that the existing dwellings could be extended to perhaps provide two or more additional bedrooms. This alternative is likely to result in an even greater increase in vehicle trips. This alternative would also have no restrictions on the number of vehicles parked on street by the occupiers and so the present scheme is considered far more acceptable in this respect.

Servicing & Refuse/Recycling Collection

The proposed dwelling will have its own bins stores within its cartilage, as shown on the proposed plans, for collection on the relevant collection day.

The servicing, refuse and recycling collection regime will be undertaken on street from Tayben Avenue and this arrangement is consistent with refuse collection for the nearby residential properties, as per the existing situation.

Parking Provision & Impact of Local On Street Parking

The current position is that the existing properties benefit from a number of on street parking permits and this is not restricted. The alternative scheme to extend the existing properties to provide additional bedrooms will inevitably result in additional cars, which presumably would be parked on street.

The proposal put forward therefore proposes that the existing properties will be allocated one off street parking space and also be restricted to one on-street parking permit and the proposed one bedroom dwelling will be allocated an on-site car parking space with an associated permit-free agreement.

The proposals for a car-capped development and on-site car parking spaces will therefore result in no additional on-street parking demand. It is therefore considered that there will be no overspill of parking onto local roads.

4. SUMMARY AND CONCLUSION:

5.A. Summary

This Transport Statement has assessed the likely effect of the development proposals on the surrounding local highway network, including local on-street parking and the compliance of national, local and regional policies.

Accessibility by non-car modes surrounding the site is good, with a number a bus stops and a rail station within TfL's / the PTAL guidance recommended walking distance. Pedestrian facilities are good, as are cycling facilities.

Parking will be provided to accord with the Council's parking standards.

The development will not result in any material change in trip generation and would result in less trips if compared with other possible extensions of the existing property.

5.B. Conclusion

As a result, it is considered that the proposals are compliant with the National Planning Policy Framework (NPPF) and the London Plan stating that residential units should be located in accessible areas as well as the Council's Local Plan and SPD requirements. The development can be accommodated without causing any prejudice to the free flow of traffic, highway and pedestrian safety that would be contrary to the aims and objectives the abovementioned policies.

In conclusion, it is considered that the proposed development is acceptable in transport terms, the application should not be prevented or refused on such grounds and the proposal should therefore be supported.

21ST AUGUST 2024