

Highways and Transport

Statement from Highways

Town and Country Planning Act 1990
Section 78 appeal against the refusal of planning permission

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Subject of Evidence: Highways and Transport

Appeal: APP/W0340/W/25/3367152

Site: Land Adjacent to M4, Membury Airfield, Lambourn Woodlands
Hungerford

Proposal: The installation and operation of an asphalt plant and
associated ancillary development.

Date received: June 6th 2025

Council Reference: 23/02142/MINMAJ

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1. Introduction

- 1.1 This statement is made on behalf of the Local Highway Authority in response to a planning appeal submitted by Putnam Properties Ltd. The proposal is for the installation and operation of an asphalt plant and associated ancillary development.
- 1.2 The planning statement that will accompany this for this appeal that will provide much further detail on the proposed location, the planning application and other reasons for refusal.
- 1.3 The site is located within the Membury industrial estate on land that is south of the M4 motorway and north of a service road that links the industrial estate to the M4 Membury motorway westbound services. The proposed site will be accessed from this service road. This service road will be discussed much further later in this statement.
- 1.4 Planning application 23/02142/MINMAJ was submitted on September 13th 2023. The LHA has always had concerns regarding the sustainability of this location and the surrounding area with regards to sustainable travel and the ability to travel to from this area by walking cycling and public transport stop this issue will be discussed later in the appeal statement. Highway officers recommended refusal of this planning application with the following reason for refusal:

The application site is located in an unsustainable location, having regard to its rural location and the lack of active travel and public transport options for the site.

Therefore, the proposed development will not reduce the need for travel, improve and promote opportunities for healthy and safe travel, minimise the impacts of travel on the environment and help tackle climate change, or promote sustainable transport contrary to West Berkshire Core Strategy policies CS13 and CS9 and the National Planning Policy Framework.

- 1.5 The planning application was presented to the Western Area planning committee on March 19th 2025. Despite an overall recommendation for approval by the planning officer, members supported the above reason for refusal and also added other reasons for refusal included the following:

Insufficient information on traffic movements and impact has been provided, with particular regard to the unknown quantity of vehicles using the motorway service station and not Ramsbury Road/Ermin Street in order to access the M4 motorway. This may be suppressing the baseline vehicle movements in the transport assessments and it is not possible to accurately conclude whether the residual cumulative impacts on the road network would be severe in line with NPPF paragraph 116. The Local Planning Authority is therefore also unable to conclude whether the proposal will be able to mitigate impacts on the local transport network or result in unacceptable impacts on road safety and local amenity, in line with West Berkshire Core Strategy policy CS9, West Berkshire Minerals and Waste Local Plan policy MWLP22, and the National Planning Policy Framework.

- 1.6 This reason for refusal was added by members following a site visit made by them prior to the committee meeting. Members observed how well used the service road was linking the Membury industrial estate and the M4 motorway Membury services. The level of use described was entirely unexpected by highway officers and therefore hadn't been considered within transport assessment work submitted by the appellants. These matters will be discussed further later in this statement

2. Relevant Policies

- 2.1 The following relevant policies within the West Berkshire council core strategy are as follows:

"Policy CS 9 Location and Type of Business Development

The Council seeks to facilitate and promote the growth and forecasted change of business development in the plan period in order to:

- manage the growth of B1 floorspace to meet future requirements;*
- manage the reduction of land for B2 uses, whilst maintaining a sufficient portfolio of sites suitable for such uses; and*
- retain a portfolio of sites for B8 uses in suitable locations.*

This will be achieved through the following:

(a) The appropriate location of business development:

Proposals for industry, distribution and storage uses will be directed to the District's defined Protected Employment Areas, and existing suitably located employment sites and premises. Any proposals for such uses outside these areas/locations will be assessed by the Council against the following:

- compatibility with uses in the area surrounding the proposals and potential impacts on those uses; and*
- capacity and impact on the road network and access by sustainable modes of transport.*

New office development will be directed towards West Berkshire's town and district centres as outlined in policy CS11. The scale of development will be appropriate to the size and character of the centre.

If no suitable sites are available within an existing centre, then the following sequential approach will be taken for accommodating additional offices in the review of Protected Employment Areas and any allocations in the Site Allocations and Delivery DPD. This sequential approach should also be used in support of any planning application for office development outside defined centres:

- Edge of centre: suitably located brownfield site or Protected Employment Area within an edge of centre location, and Newbury Business Park.*
- Out of centre: brownfield site or Protected Employment Area within an out of centre location, with good accessibility by alternative modes of transport.*
- Other existing employment sites and premises not in an edge of centre or out of centre location.*

Proposals for non-town centre uses which seek the loss of office floorspace within defined town and district centres will need to demonstrate that the proposal maintains the vitality of the existing centre and would not substantially prejudice the overall supply of office floorspace over the Core Strategy period in that centre".

“Policy CS 13 Transport

Development that generates a transport impact will be required to:

- *Reduce the need to travel.*
- *Improve and promote opportunities for healthy and safe travel.*
- *Improve travel choice and facilitate sustainable travel particularly within, between and to main urban areas and rural service centres.*
- *Demonstrate good access to key services and facilities.*
- *Minimise the impact of all forms of travel on the environment and help tackle climate change.*
- *Mitigate the impact on the local transport network and the strategic road network.*
- *Take into account the West Berkshire Freight Route Network (FRN).*
- *Prepare Transport Assessments/Statements and Travel Plans to support planning proposals in accordance with national guidance.*

2.2 The following relevant policies are included in the West Berkshire Local Plan Review 2023-2041 version for adoption June 2025.

“Policy SP 19 Transport

Development that generates a transport impact will be required to:

- *Have regard to the West Berkshire’s declared Climate Emergency and minimise the impact of all forms of travel on the environment.*
- *Improve and promote opportunities for active travel.*
- *Improve travel choice and facilitate sustainable travel particularly within, between and to main urban areas and rural service centres.*
- *Demonstrate good access to key services and facilities.*
- *Mitigate any impact on local transport networks and the strategic road network.*
- *Have regard to the West Berkshire Freight Route Network and availability of lorry parking where development will need the support of these facilities.*

Non-residential developments will be required to prepare Transport Assessments or Transport Statements as appropriate in support of the proposed development. The judgement regarding the need for such documents lies with the Council and will be

guided by indicative thresholds for various uses. For residential development, a full Transport Assessment will be required where 60 or more dwellings are proposed. Where 30 or more dwellings are proposed, a Transport Statement will be required. Where appropriate, any development below 60 dwellings may be requested to produce a full Transport Assessment. Development proposals should follow the advice set out in the Council's 'Highway Design Guidance for Residential Developments.' Travel Plans and the implementation of associated measures will be required for all developments which generate a significant amount of transport movement and in accordance with policy DM45 relating to travel planning measures.

Policy DM42 Transport Infrastructure

Proposals for new development will be expected to demonstrate the type and level of travel activity likely to be generated. In order to assist in tackling the climate emergency, this travel activity will be expected to be minimised by the design of developments that support low levels of travel with a focus on local journeys that can be made sustainably. Developments will be required to be supported through a range of infrastructure associated with different transport modes. New development will only be supported where the relevant transport infrastructure is delivered in a timely manner. Development will, where necessary, be required to make a proportionate contribution to the provision for improvement to transport infrastructure including, where relevant, the following:

- a. Connections and improvements to local pedestrian, cycle and equestrian networks, including access to public transport routes;*
- b. Walking, cycling and equestrian infrastructure identified in relevant Local Cycling and Walking Infrastructure Plans;*
- c. Secure cycle and motorcycle parking;*
- d. Improvements to passenger facilities across a range of transport interchanges;*
- e. Provision of real time passenger information at bus stops along key bus routes;*
- f. New or improved passenger transport services;*
- g. Improvements to the safety and operational capacity of the local road network;*
- h. Works to allow the re-use of former railway line alignments as walking, cycling, and equestrian routes; and*
- i. Provision of electric vehicle charging points and associated infrastructure”.*

- 2.3 Paragraph 110 of the National Planning Policy Framework (NPPF) December 2024 states that *“the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making”*.
- 2.4 With regards to sustainability, it is considered that the proposal does not comply with Policy CS9 as it is not within an *“appropriate location of business development”* as there is no or very limited *“access by sustainable modes of transport”*. The policy then describes a sequential test where a site should be *“with good accessibility by alternative modes of transport”*. The proposal fails to comply with Policy CS 13 Transport where development is expected to *“reduce the need to travel, improve and promote opportunities for healthy and safe travel, improve travel choice and facilitate sustainable travel particularly within, between and to main urban areas and rural service centres, demonstrate good access to key services and facilities”* and *“minimise the impact of all forms of travel on the environment and help tackle climate change”*. The proposal also fails to comply with Policy DM42 Transport Infrastructure where *“proposals for new development will be expected to demonstrate the type and level of travel activity likely to be generated. In order to assist in tackling the climate emergency, this travel activity will be expected to be minimised by the design of developments that support low levels of travel with a focus on local journeys that can be made sustainably”*.
- 2.5 With regards to the insufficient information on traffic movements and impact reason for refusal, the proposal fails to comply with Policy DM42 Transport Infrastructure where *“non-residential developments will be required to prepare Transport Assessments or Transport Statements as appropriate in support of the proposed development. The judgement regarding the need for such documents lies with the Council and will be guided by indicative thresholds for various uses”*.
- 2.6 The proposal is also contrary to paragraph 110 of the NPPF. In this location it is not possible to offer *“a genuine choice of transport modes”* that can help *“to reduce congestion and emissions and improve air quality and public health”* It is also not possible to *“maximise sustainable transport solutions”* in this rural location.

3. Issues of sustainability

- 3.1 The Local Highways Authority have objected to the proposal on sustainability grounds, due to the nearest bus stop to the site being 1.5km away with infrequent services.
- 3.2 There are no pedestrian facilities such as footways on Ramsbury Road or Ermin Street, and the roads are not ideal for cyclists due to relatively higher traffic volumes. There is also no lighting that would assist pedestrians and cyclists.
- 3.3 The LHA accepts that it would be impractical for deliveries or customers to access the site using anything other than vehicles that are capable of carrying aggregate and hot tarmac. As the proposal is stated as directly employing five people it is not considered that this would constitute a significant impact on sustainability with regards to staff. But the LHA considers that the location is unsustainable as delivery vehicles will need to travel longer distances to serve potential areas of population where product would be required. During consideration of the planning application, it was never shown that having the facility in this location would reduce overall journeys and carbon emissions in the production and delivery of asphalt when compared to existing plants.
- 3.4 The LHA therefore considers that the proposal is contrary to local and national policies that aim to reduce carbon emissions and is contrary to the Climate Change Emergency that was declared by this Council in 2019.

4. Issues of insufficient information on traffic movements and impact

- 4.1 Traffic generation was viewed in considerable detail by the LHA and the applicant's highway consultants, especially with regards to significant local concern regarding traffic levels including HGV's on the B4000 Ermin Street through locations such as Lambourn Woodlands. The proposal is projected with the following expected traffic generation based on 30,000 tonnes per annum as shown in the table below:

Vehicle trip generation (2-way movements)								
	Annual production of plant of 30,000 tonnes Raw materials delivered in 20 tonnes loads Highways contractor collections (25% of production) in 20 tonnes Average private customer collections (75% of production) in 5 tonnes							
	Daily				Peak hour			
Site Usage	HGV	Light Commercial	Cars	Total	HGV	Light Commercial	Cars	Total
Proposed development (1)	12	26	10	48	1	3	5	9
Proposed development including 20% buffer (2)	16	36	10	62	2	4	5	11
Existing permitted use 21/03083/COMIND (3)	4	8	10	22	1	1	5	7
B8 use on part of site being replaced (4)	1	2	2	5	0	1	1	2
Net increase in trips (1) – (4)	11	24	8	43	1	2	4	7
Net increase in trips (2) – (4)	15	34	8	57	2	3	4	9
Note: An odd number of 2-way movements is an average figure. Hence, for example, 11 two-way movements might equate to 10 movements one day and 12 movements the next day.								

Table1 Generated Vehicle Movements

4.2 The above projection has been accepted by the LHA and it is considered that the production can be limited by appropriate conditions.

4.3 In response to many of the concerns raised by the public, the applicants submitted additional traffic assessments to:

- Undertake a review of Personal Injury Accidents (PIAs) along the B4000 from Membury over the most recent 10 years, comparing the latest five years with the preceding five years and identify any trends.
- Assess the potential cumulative impact of the proposed development traffic on the B4000, specifically in relation to the number of HGVs.
- Examine and validate the existing survey data recorded on Ermin Street (B4000).

- Consider the future impact of vehicles by applying growth factors to the existing traffic survey data to 2029, and add traffic associated with local committed developments, and the proposed development.

4.4 Personal Injury Accident data was supplied directly from the LHA from Thames Valley Police for the most recent ten year period up to June 2024. The most recent five years from June 2019 to June 2024 was compared with the preceding five years being June 2014 to June 2019.

4.5 From 2014 to 2019, there were a total of nine PIA's, six resulting in slight injuries and three resulting in serious injuries. For the following five years from 2019 to 2024 there were a total of ten PIA's, again six resulting in slight injuries and four resulting in serious injuries. Every PIA is regrettable, but from these figures it would be difficult to tell so far whether there is a clear trend on the roads within the vicinity of the site or along the B4000 that they are so becoming more susceptible to PIA's

4.6 The applicants have undertaken further traffic surveys in the area during early December 2024 that have been compared with earlier data. This includes data obtained from the Walkers Logistics planning application 19/02979/FUL and traffic surveys undertaken by this Council. The data is as follows:

Total through Ermin Street / Ramsbury Road crossroads

	08:00-09:00		17:00-18:00	
	Light	Heavy	Light	Heavy
30/04/2019	395	30	409	27
26/11/2024	293	39	368	8

**B4000 Woodlands St Marys St Marys Parish Church - Lat/Lng.
51.48193,-1.54501**

	Eastbound		Westbound	
	Light	Heavy	Light	Heavy
24/01/2020	1958	199	1723	243
27/01/2020	1920	157	1432	204
03/11/2021	2102	221	1864	325
04/11/2021	2068	238	2015	362
05/11/2021	1808	197	1809	280
25/11/2024	1974	433	2474	362
26/11/2024	1858	420	2660	388
27/11/2024	1888	409	2885	375
28/11/2024	1787	388	2348	374
29/11/2024	1815	404	2481	342

NB - Heavy vehicles include all vehicles exceeding a length of 5.2 metres

- 4.7 Unfortunately, the information is still somewhat limited in places including only two days of snapshot of the Ermin Street / Ramsbury Road crossroads. From those figures it is interesting that it is suggested that in 2024, there is a decrease in the number of vehicles using the crossroads compared to 2019. But much more data would need to be obtained to gain a better picture.
- 4.8 The traffic flows along the B4000 near St Mary's church do suggest a definite upward trend particularly westbound in total traffic numbers and the overall number of heavy vehicles using the road, which goes some way to confirming the concerns raised by

many residents in the Lambourn Woodlands area. Due to the data from the crossroads, it is not possible to conclude that the increase in traffic on the B4000 since 2019 is entirely due to Membury. The increases may also be quite possibly to or from the Lambourn or Baydon area, or even further in those directions.

- 4.9 Either way, the Local Highway Authority is becoming increasingly concerned regarding the increase in traffic that seems to be occurring along the B4000 through Lambourn Woodlands particularly with HGV's. The number of HGV's along the B4000 is much higher than similar B roads across the district. However, there are now two questions that need to be answered, being is this increase causing detriment with regards to congestion along links and junctions, and highway safety and secondly is this development proposal potentially adding to those numbers to sufficiently to raise an objection.
- 4.10 A final part of the traffic assessment is projecting traffic levels on the B4000 by 2030. All known committed developments including Walkers Logistics and allocated housing sites in the local plan have been considered. By 2030, this proposal will increase traffic overall by just over 1% along the B4000, which in the view of the LHA is a very small increase.
- 4.11 Prior to the committee meeting, it was therefore considered on balance with the data available above, that it would still be difficult to refuse this planning application of traffic level grounds and highway safety at this stage, but the situation along the B4000 and towards Membury will need to be monitored and recorded further with any further significant development proposals in the area.
- 4.12 This on balance view to not object on traffic grounds was the view presented to members of the Western Area planning committee on March 19th 2025. However, during the committee meeting, members raised concern regarding the level of use of the service road from the Membury Industrial Estate to the M4 Membury motorway services. Members claimed that there was a vehicle using it about "one every minute".
- 4.13 The use of the service road is supposed to be enforced by National Highways, but its use is seemingly uncontrolled and unfettered. The concern is from a member and highway officer point of view is that if the use of the service road is enforced, the traffic distribution to and from the industrial estate and the appeal site would be reallocated to the B4000 Ermin Street. Members took the view that the appellant's highway consultants had not considered this within any transport assessment work.

- 4.14 Should traffic be reallocated back to the B4000, traffic levels could be even higher than the levels recorded above, and members were presented with the possible impact of this increase in traffic levels being an unknown quantity due to the lack of available data in respect of these unsurveyed vehicle movements.



- 4.15 Highway Officers visited the service road to record traffic on July 16th 2025 during the AM peak. From the above picture, there is signage aiming to prohibit access by unauthorised vehicles and there is a set of gates amongst the hedging, that do not seem to have been operated for some years. But West Berkshire Council as LHA has no control over should National Highways close the gates and enforce use of the road, and therefore it is contended that this should be considered.

- 4.16 The traffic survey results were as follows:

Membury Industrial Estate to M4 Membury Service Station access road

Traffic count 16/07/25 08:00 to 09:00

Weather - dry, warm and sunny

	Westbound		Eastbound	
	Cars	Larger vehicles	Cars	Larger vehicles
08:00 to 08:10	5	1 HGV 1 OGV 1 van	1	
08:10 to 08:20	3	1 OGV	5	
08:20 to 08:30	7	1 HGV 1 van	5	
08:30 to 08:40	4 1 + trailer	1 HGV 1 van	3	
08:40 to 08:50	2	1 HGV	3 1 police car	2 HGV's 2 vans
08:50 to 09:00	4 1 + trailer	3 vans	4	1 van
TOTALS	25	12	22	5

- 4.17 It is contended by members of the Western Area planning committee and highway officers that the applicant's highway consultants needed to look into this issue much further. This should include traffic surveys of the service road or use of existing surveys to provide additional scenarios considered in the transport assessment should National Highways decide to enforce the use of the road. In that scenario, how high could traffic be, including HGV's on roads such as the B4000 Ermin Street through locations such as Lambourn Woodlands. What would this additional impact be, and would it alter the

above overall conclusions? Would there be further difficulty that this proposal would then add? Could there be an increased risk of traffic congestion and could there be an increased risk of PIA's as a result of potential higher traffic levels. Unfortunately, this additional information has not been submitted and therefore it is our view that the reason for refusal mentioned earlier would still stand.

5. Response to Appellants statements

- 5.1 Page 3 and paragraph 10 states that the reason for refusal on sustainability *“fails to have regard to the numerous sustainability benefits of the Scheme. Some of these are set out in the OR (for example, at paragraphs 6.2 and 6.3) and can be summarised and expanded upon as follows:*

a. reduction in the long-distance vehicular journeys which are currently required into West Berkshire as a result of West Berkshire being a net importer of crushed rock (eg Waste Objective W3 in the Council's adopted Minerals and Waste Local Plan (December 2022) (“the MWLP”) and Policy 3 of the MWLP;

b. proximity of the Site to customers, thereby avoiding travel by those customers to plants outside West Berkshire;

c. reduction in anticipated closures for resurfacing of the M4 due to the proximity of the Scheme to the motorway, leading to fewer diversions and traffic jams;

d. the reuse of up to 30% of pavement asphalt in its manufacture of new asphalt, reducing waste and the district's carbon footprint”;

- 5.2 Unfortunately point a. has never been explained in more detail. Would the provision of an asphalt plant in this location reduce trips and journey times when compared to any existing plants for instance in the south of England? With regards to point b, the location has a relatively limited amount of population to serve as a customer base compared to larger urban locations and therefore delivery of asphalt to larger settlements would be a longer journey then if this proposed facility was located, for instance in closer proximity to locations such as Reading. I do not consider that the M4 being closed for resurfacing would occur that often to have much weight and I consider that the reuse of 30% of

pavement asphalt could take place in any location including a more sustainable location closer to larger population centres

- 5.3 Pages 4 and 5 states that the traffic survey *“results explained that there were a total of 1,014 (two-way) vehicle moments per day along the Service Road, equating to an average of c.42 vehicles per hour (two-way). Paragraph 2.42 stated that “no HGV traffic will utilise the link road to the Membury Service Station and appropriate restrictions will be put in place to ensure this, including a lorry control plan”. Whilst the draft planning conditions set out in the OR did not include such restrictions, PPL would agree to the imposition of such a condition if the Inspector considered it to be necessary”*. In response while such a condition maybe sound in principle, it is considered that this would be difficult to enforce and it hasn't overcome the overall concern that the use of the service road has not been considered in the overall transport assessment, and again what would be the implications should National Highways decide to enforce and close the service road to some traffic.
- 5.4 Paragraph 9 states that *“any current unauthorised use of the Service Road is a matter for National Highways. The Scheme, meanwhile, must be assessed on its terms. As the TTN data confirmed, the use of the Service Road is not problematic and draft conditions could limit its use by traffic associated with the Scheme. The LHA did not maintain an objection based on the impact of the Scheme on the Service Road”*. In response the use of the service road was a significant point of concern of members of the Western Area planning committee following their site visit and observations of the level of usage of the service road. Again, it is contended that further transport assessment work is required to consider the scenario that the service road be closed to some or all traffic by National Highways. As mentioned previously West Berkshire Council as LHA has no control over the use of this road and therefore it is our view that this should be considered. Unfortunately, these matters have not been considered in full at this time with any further transport assessment work
- 5.5 Page 11 considers a fallback position, where the site *“has the benefit of an extant consent under the 2022 Permission. This fallback position was considered in the transport assessment submitted with the planning application and is included in Table 1 at paragraph 4.1 above. This table was submitted by the appellants highway consultants and accepted by the LHA. The table shows an increase in vehicle movements compared to what has been described as the fallback position.*

6. Conclusion

- 6.1 The Local Highway Authority have objected to the proposal on sustainability grounds. There are no major population centres or sustainable travel within relatively close proximity to this site. The LHA considers that the location is unsustainable as delivery vehicles will need to travel longer distances to serve potential areas of population where product would be required. During consideration of the planning application, it was never shown that having the facility in this location would reduce overall journeys and carbon emissions in the production and delivery of asphalt when compared to existing plants.
- 6.2 An additional reason for refusal was added by members following a site visit made by them prior to the committee meeting. Members observed how well used the service road was linking the Membury industrial state and the M4 motorway Membury services. The level of use described was entirely unexpected by highway officers and also hadn't been considered within transport assessment work submitted by the appellants. It is contended by members of the Western Area planning committee and highway officers that the applicant's highway consultants needed to look into this issue much further. From traffic surveys of the service road, additional scenarios should be considered in the transport assessment should National Highways decide to enforce and restrict the use of the road to traffic and consider the implications of redistributed traffic, especially on roads such as the B4000. Unfortunately, at this time, this work has not been undertaken by the appellants highway consultants and therefore at the time of writing this reason for refusal also stands.
- 6.3 With the above two reasons for refusal covered within this statement, the planning inspector is respectively asked to dismiss this appeal.

7. Recommended conditions

- 7.1 Should the planning inspector allow this appeal, in our view the following should be applied:

Record of Vehicle Movements

A written record shall be maintained at the site office of all movements out of the site by HGVs. Such records shall contain the vehicles registration, operating

company's identity, and the time/date of movement. The records shall be made available for inspection by the Local Planning Authority if requested and retained for a period of not less than 12 months.

Reason: To enable the Local Planning Authority to monitor operations. This condition is imposed in accordance with the National Planning Policy Framework 2024, and Policy SP19 of Local Plan Review 2023 - 2041

Site Capacity

The total amount of asphalt leaving the site shall not exceed a level of 25,000 tonnes per annum. All weekend collection data and quantum of asphalt exported from the site should be submitted to the Highways Department of the local planning authority annually to ensure no additional traffic movements are generated which is likely to worsen the impact on the local highway network.

Reason: In the interests of the amenity of the area in accordance with policy with the National Planning Policy Framework 2024, and Policy SP19 of Local Plan Review 2023 - 2041

Paul Goddard

Highways Development Control Team Leader

July 18th 2025.