



## Committee Report

**Planning Committee South – 22 February 2022**

**Application no** DC/20/1831/OUT

**Location**

Land Off St Andrews Place And  
Waterhead Lane  
St Andrews Place  
Melton  
Suffolk

**Expiry date** 17 August 2020

**Application type** Outline Application

**Applicant** Warburg Dawson Partnership

**Parish** Melton

**Proposal** Outline Application with Some Matters Reserved - Residential development of up to 55 dwellings, with access off St Andrews Place

**Case Officer** Rachel Smith  
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### 1. Summary

#### Reason for Committee

- 1.1 The application has previously been considered by the south area Planning Committee on 30<sup>th</sup> March 2021. Members resolved to approve the application in line with the Officer recommendation. The full report from the previous meeting is included as Appendix 1.
- 1.2 As the application required a S106 Agreement to be completed, the decision notice was not finalised shortly after this meeting. On 5 May 2021, the Council received a letter from Birketts LLP on behalf of their clients, Mr. And Mrs. Chalmers of Wilford Lodge, Station Road, indicating that they considered the decision, when issued would be amenable to a successful Judicial Review Challenge. The letter stated “In particular it appears that the Committee was misled in a material way regarding the detail and status of the statutory highway consultation.” It also included that they considered the Committee was advised

incorrectly regarding potential costs that could be sought against the Council in the event of an appeal.

- 1.3 The Council responded formally to this letter on 26 May 2021 disputing the claim and stating that the application was fully considered and that officers were properly advised. It went on to state “However because of the issues raised since the decision complained of, in particular the further representations made by the local community, and that the required S106 Agreement has yet to be concluded, the Council is prepared to remit the matter to the Planning Committee South for their re-consideration.”
- 1.4 The letters received from Birketts in respect of this matter and the Council’s replies to these letters are included as Appendices 2 – 5.
- 1.5 This report provides a summary of the application site, the proposal and the main issues which were provided in full in the previous Committee Report (Appendix 1). The focus of this report, including reference to neighbour representations and consultee responses is focused on the matters raised since the Committee’s previous resolution.

### Recommendation

- 1.6 The recommendation of this application is to approve subject to controlling conditions as detailed below.

## **2. Site description**

- 2.1 The application site covers an area of 3.4 Hectares and is located within the physical limits boundary of Melton as defined in the Melton Neighbourhood Plan. The site is located to the north east of the settlement and is also within a Special Landscape Area.
- 2.2 The site forms part of a larger site which has been allocated for a mixed-use development by Policy MEL20 of the Neighbourhood Plan. The application site is located to the north of this allocation and is currently overgrown with a number of trees. It shares its western boundary with existing residential dwellings on St. Andrews Place. There is a tree belt to the north and east of the site and a public right of way (Bridleway 10) also lies adjacent to these boundaries.

## **3. Proposal**

- 3.1 The application has been made in Outline form with all matters reserved except for access. Access is proposed off the northern end of St. Andrews Place and an indicative layout plan showing 55 dwellings has been submitted with the application. The application also includes an area of open space between the proposed housing and the remainder of the allocated site to the south.
- 3.2 In order to achieve a safe and suitable access, additional highways works are proposed further along St. Andrews Place and onto Station Road. These works include providing crossing points, new lengths of footway, widening existing footway and providing additional parking spaces.

#### 4. Consultations/comments

- 4.1 Since 30<sup>th</sup> March 2021, no formal consultation with local residents has been carried out however 64 third-party representations objecting to the proposed development have been received, a number from those who had previously objected. The objections can be summarised as follows:

##### Highways – St. Andrews Place

- St. Andrews Place is narrow with many parked vehicles – it would be too narrow for construction vehicles to navigate or for vehicles to pass construction vehicles.
- Construction workers parking on St. Andrews Place would increase congestion
- Road surface is already poor and construction vehicles will worsen this
- Increase traffic including construction vehicles would make it unsafe, particularly for children and the elderly

##### Highways – Melton and Woodbridge

- Constant queue at Melton cross roads
- Station Road already busy and unsuitable for construction vehicles or additional traffic
- Recent developments have caused traffic problems from road works, road closures etc.
- Lots of on-street parking in the village already causes traffic problems

##### Environment

- Increase in noise and air pollution
- Potential to increase flood risk elsewhere
- Greenfield site not suitable for housing
- Trees have already been taken down

##### Community

- Will have a negative impact on community well-being – existing community is very inclusive and socially active given it is quiet and safe but this will not be possible during construction and after given increase in vehicular traffic
- The community benefits set out in the Neighbourhood Plan will not be provided
- Insufficient infrastructure to cope with additional housing e.g. schools, doctors, dentist
- Proposal is not what was agreed in the Neighbourhood Plan particularly in that the access would not be through St. Andrews Place
- Community were misled during production of the Neighbourhood Plan

##### Other

- Irreplaceable damage to important water resources resulting in the loss of private water supply
- A number of these letters suggest Members should carry out a site visit to fully appreciate the situation.
- MEL2, MEL6 and MEL17 are also relevant

## 5. Additional Consultee responses post 30 March 2021

### Statutory consultees

Consultee	Date consulted	Date reply received
Suffolk County Council - Highways Department		13 September 2021
<p>Comments in detail:</p> <p>Notice is hereby given that the County Council as Highways Authority recommends that permission be refused for the following reasons:</p> <p>The comments from Ben Chester's response dated 1st September 2020 have not been fully addressed:</p> <p><i>"Further to our previous response dated 22nd July 2020 (ref: SCC/CON/2825/20), it is noted that amended highway related plans have been submitted. Further discussions with the applicant's agent have also been undertaken. Drawing 4465-0104 P05 provides an additional southern footway link and maintains the total of 11 laybys in the area that suffers from potentially obstructive parking. It is accepted that the scope of improvements to St Andrew's Place has progressed as far as is feasible and the improvements would provide a noted benefit to the flow of traffic and improve pedestrian facilities. Drawing 4465-0108-P06 illustrates the additional pedestrian and cycle link to St Andrew's Place. It should be noted that the footpath link to Brick Kiln Lane as requested by SCC Public Rights of Way team will also need to be a shared pedestrian and cycle link as Brick Kiln Lane is a Bridleway. However, the Highway Authority's concerns relating to construction access, traffic impact and sustainable access remain outstanding. Subsequently, the objection from the Highway Authority remains."</i></p> <p>Whilst we welcome the addition of more off street parking in St Andrews Place, some spaces are now opposite pedestrian crossing points for example adjacent to 29 and 31. This does not afford a safe crossing point for pedestrians. The addition of a tracked plan 4465-0104 P07 showing a 10.1m rigid vehicle passing partially through St Andrews Place, does not demonstrate that construction vehicles can safely navigate the residential area even without parked cars in the vicinity. Construction HGV's are usually considerably longer and articulated. Subsequently, the objection from the Highway Authority remains.</p> <p>Notwithstanding the Highway Authority's objection, if the local planning authority consider the benefits of this site to outweigh the dis-benefits, any planning permission granted should include the following highway planning conditions, (the first three are additions to the previous response and should be applied if it is felt that the items within them can be conditioned with the information thus far submitted, however at this stage we consider they have not been adequately demonstrated):</p> <p>Condition: No part of the development shall be commenced until a photographic condition survey of the highway fronting and near to the site has been submitted to and approved in writing by the Local Planning Authority. Reason: In the interest of highway safety, to ensure that damage to the</p>		

highway as a result of the development is repaired at the developer's cost and satisfactory access is maintained for the safety of residents and the public.

Condition: All HGV delivery traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the Local Planning Authority for approval a minimum of 56 days before any deliveries of materials commence. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. [The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.]

Reason: In the interests of highway safety, to reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques (if applicable)
- d) storage of plant and materials
- e) provision and use of wheel washing facilities
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
- g) site working and delivery times
- h) a communications plan to inform local residents of the program of works
- i) provision of boundary hoarding and lighting
- j) details of proposed means of dust suppression
- k) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network
- m) monitoring and review mechanisms.
- n) Details of deliveries times to the site during construction phase"

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

Consultee	Date consulted	Date reply received
Network Rail		30 July 2021
<p>Summary of comments:</p> <p>Following reconsultation on the application and further assessment of the proposed Development, Network Rail is concerned in relation to the potential impact from the proposed Development on the usage and safety of Ellingers No.31 crossing, which is situated adjacent to the south eastern corner of the application site. Ellingers No.31 is a Footpath with Wicket Gate crossing located on the East Suffolk branch line. Proposed Site Plan (no. 4465-0108), which was submitted as part of the planning application, shows a new footpath link from the proposed Development site to Brick Kiln Lane. Brick Kiln Lane connects to Ellingers No.31 crossing.</p>		

Although Network Rail does not object to the principle of the proposed Development, we request that the proposed direct footpath access from the Development to Brick Kiln Lane is removed. If the proposed direct footpath link cannot be removed, other forms of mitigation would be required at Ellingers No.31 crossing to address the potential increase in usage and risk at the crossing as a result of the proposed Development. Network Rail would welcome further discussion with the Developer in relation to the proposed Development and its impact on Ellingers No.31 crossing.

Consultee	Date consulted	Date reply received
Forestry Commission		28 April 2021

**Summary of comments:**

Trevor inspected the site on 14th October 2020 and found it to be compliant with the restocking notice. However, I would draw your attention to the maintenance conditions of the notice, these run for 10 years from the planting/first signs of regeneration. The Forestry Commission may inspect the site again at any point during this 10 year period to ensure that the restocking is compliant with the notice. Any trees which fail, die or are otherwise lost during the 10 year period under must be replaced by 30th June the following year to provide satisfactory restocking. We will be in contact with the owner if any non-compliance is observed.

Consultee	Date consulted	Date reply received
Natural England		9 April 2021

**Summary of comments:**

**NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED**

We consider that without appropriate mitigation the application would; Have an adverse effect on the integrity of:

- Alde-Ore Estuary Special Protection Area (SPA) and Ramsar site
- Deben Estuary Special Protection Area (SPA) and Ramsar Site
- Sandlings Forest SPA
- Orfordness-Shingle Street SAC

<https://designatedsites.naturalengland.org.uk/>.

In order to mitigate these adverse effects and make the development acceptable, the mitigation measures should be secured as identified within the Appropriate Assessment of the draft Habitats Regulations Assessment (HRA) (dated 19/03/2021). These measures include:

- A Construction Environment Management Plan (CEMP).
- A Landscape and Ecological Management Plan (LEMP).
- A Recreational Mitigation Strategy.
- The provision of details of the Sustainable drainage systems (SuDS) strategy for the site in line with the requirements of the Lead Local Flood Authority.
- A financial contribution of £17,667.10 to the Suffolk Coast RAMS, either via upfront (S111) payment or S106 agreement.

## 6. Publicity

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
Major Application	4 June 2020	25 June 2020	East Anglian Daily Times

### Site notices

General Site Notice	Reason for site notice: Major Application In the Vicinity of Public Right of Way Date posted: Expiry date:
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## 6. Planning policy

6.1 National Planning Policy Framework 2021

6.2 Melton Neighbourhood Plan - 'Made' January 2018 policies:

MEL1 - Physical Limits Boundaries

MEL2 – Dedicated Access for Cyclists and pedestrians

MEL20 - Land Off Wilford Bridge Road

6.3 East Suffolk Council - Suffolk Coastal Local Plan, Adopted September 2020 policies:

SCLP3.2 - Settlement Hierarchy

SCLP3.3 - Settlement Boundaries

SCLP5.1 - Housing Development in Large Villages

SCLP5.8 - Housing Mix

SCLP5.10 - Affordable Housing on Residential Developments

SCLP7.1 - Sustainable Transport

SCLP7.2 - Parking Proposals and Standards

SCLP9.2 - Sustainable Construction

SCLP9.5 - Flood Risk

SCLP9.6 - Sustainable Drainage Systems

SCLP10.1 - Biodiversity and Geodiversity

SCLP10.4 – Landscape Character

SCLP11.7 - Archaeology

## 7. Planning considerations following additional comments received since 30 March 2021

Proposed claim Ground 1 – Failure to have regard to material considerations (in relation to the position of Suffolk County Council as local Highways Authority)

- 7.1 It has been claimed that Members of the Planning Committee were previously advised, incorrectly, by the Head of Planning and Coastal Management in the meeting of 30<sup>th</sup> March 2021 that the Highways Authority had raised concerns, and not objections to the planning application. It is therefore claimed that Members of the Committee could not possibly have balanced the pertinent policy considerations with the material planning considerations (para. 6.1.1 of Appendix 2).
- 7.2 The recording of the meeting was provided to the Claimant and in the Council's reply to this claim, "Contrary to what is said in your letter, officers informed the Committee, on multiple occasions, that the HA had raised a formal objection to the Proposed Development. Although it is correct that Philip Ridley, the Council's Head of Planning and Coastal Management, stated at 54.38 that the HA had raised "*concerns*" rather than "*formal objections*" he also stated, at the same time, that he would hand over to the Planning Officer, Rachel Smith, to provide further detail. Subsequently at 56:55 Ms Smith confirmed that the HA had raised an objection. She went on to explain that this objection did not relate to the use of St Andrews Lane for residential access, but to three other concerns, namely (i) the use of St Andrews Lane for construction access; (ii) a requirement to mitigate impact on the Melton signalised crossroads (junction of the A1152 and B1438); and (iii) the absence of a direct link from the Site to Melton Railways Station."
- 7.3 The position with regards to the highways implications of the proposal and the comments given by the Highways Authority have not changed significantly however, for the avoidance of any doubt, these will be clearly set out in the following paragraphs.
- 7.4 During the course of the application, the HA comments have been as follows:
- 7.5 On 12<sup>th</sup> June 2020, the Highways Authority made their initial comments on the proposal. These comments stated "There are a number of issues with the proposal that require mitigation and/or further information. Therefore, please consider this a holding objection until the points below are addressed. Failure to satisfactorily address them may result in a recommendation for refusal from the Highway Authority."
- 7.6 This letter went on to detail concerns in relation to the proposed site link to the highway, the main access via St. Andrews Place, construction access, traffic impact and sustainable access. The letter also included comments from the relevant SCC teams in relation to a travel plan, passenger transport and public rights of way.
- 7.7 Following receipt of revised plans, on 1<sup>st</sup> July 2020 the Highways Authority commented that the principle of access and parking provision is acceptable in relation to the proposed site link to the highway. It also makes further comments regarding the details of off-site works in relation to the provision of parking lay-bys but concludes that the revisions do not fully address the Highway Authority's concerns about access via St Andrew's Place which remains an outstanding reason for objection in addition to other concerns relating to construction access, traffic impact and sustainable such that the holding objection from the Highway Authority remains.
- 7.8 This letter also makes additional comments from the SCC PROW team regarding Policy MEL20 and the provision of a link to the adjacent bridleway.



- 7.9 On 22<sup>nd</sup> July 2020, further comments were received from the Highways Authority acknowledging a further revised plan amending the layby locations and footpath link to Brick Kiln Lane however they also state that the revised plan does not fully address the concerns about access via St Andrew's Place which remains an outstanding reason for objection in addition to other concerns relating to construction access, traffic impact and sustainable access such that the holding objection remains.
- 7.10 The following response (and last prior to the previous Planning Committee meeting) from the Highways Authority is dated 1<sup>st</sup> September 2020 and is referred to in the latest response set out above. Within this response they accept that the scope of improvements to St Andrew's Place has progressed as far as is feasible and the improvements would provide a noted benefit to the flow of traffic and improve pedestrian facilities however also that the objection to the proposal remains due to construction access, traffic impact and sustainable access as detailed in their response dated 12 June 2020.
- 7.11 Following the Committee meeting in March 2021, the applicant contacted the local planning authority and local Highways Authority in an attempt to offer some mitigation. This included a revised drawing for the off-site highways works to include additional lay-by parking spaces. The proposal included work along St Andrews Close to improve footpaths and add dropped kerbs so that access to Station Road is better. They also noted that the Section 106 agreement will cover funding for a real-time display to the bus stop and funding for improved footpath access to the station from Wilford Bridge Road.
- 7.12 The applicant did also note that provision of a direct line footpath between the site and Wilford Bridge Road would not be possible as this requires cooperation from third party landowners.
- 7.13 With regards to construction access, the applicant recognised that it can be temporarily disruptive and should be managed to ensure that it does not create unacceptable nuisance. They acknowledged the proposed planning conditions requiring completion of the improvements along St Andrew's Place and approval of a construction management plan and do not consider that compliance with these will be unachievable commenting that some construction vehicles accessed the site previously with no problems.
- 7.14 This plan also added swept path diagrams for a 10.1m rigid goods vehicle to the most difficult turning points to demonstrate that the existing roads are adequate for construction deliveries and removal of excavated material.
- 7.15 In relation to traffic impact, the applicant notes that some mitigation of traffic impact will be provided by the items described above, and the requirement for provision of Residents' Travel Packs as confirmed by proposed planning condition will also help. In addition the applicant wants to commit to providing each newly completed dwelling with 2 cycles and secure cycle parking facilities as further encouragement to reduce the need for car journeys arising from this development.
- 7.16 The Highways Authority were consulted on this application and their comments are detailed with the additional consultee comments received in Section 5 above. As may be expected, these additional details, while providing minor improvements, have not been sufficient to overcome the objection from the Highways Authority.

- 7.17 Following these comments, the applicant provided a further amended plan seeking to overcome some areas for concern identified by confirming the link to the bridleway will be a combined pedestrian/cycleway link and providing a more direct footway crossing point in front of 42-44 St Andrews Place. They also comment that they are happy to accept a construction management plan condition and indicate that smaller vehicles can be used to provide materials etc. to the site. These comments are not considered to address the previously raised concerns in any material way.
- 7.18 Although some revisions and additional comments have been made, the position now in relation to highways impact and access to the site is not materially different to that previously presented at Committee on 30 March 2021. This position is that the Highways Authority **object** to the proposal due to construction access, traffic impact and sustainable access as detailed in their response dated 12 June 2020. However, they do accept that the scope of improvements to St Andrew's Place has progressed as far as is feasible and the improvements would provide a noted benefit to the flow of traffic and improve pedestrian facilities. It is on this basis that the previous application was considered.

Planning considerations in relation to access and highways considered previously and relevant now

- 7.19 MEL20 of the Melton Neighbourhood Plan (full details in the previous Committee report – Appendix 1) requires that options are explored to avoid a single vehicular access from the allocated site onto the A1152 subject to demonstrating that this would not have a detrimental impact on access for residents adjacent to the development. The existing Riduna Park development has its access onto Station Road and the application site proposes access off St. Andrews Place. This part of the policy has therefore been complied with as the allocation as a whole would not have a single access onto the A1152.
- 7.20 The concern in relation to construction access relates to St Andrew's Place not being considered a suitable route for construction vehicle due to the narrow width of the carriageway with parked vehicles likely to make this more challenging. The Highways Authority recognise that this would be a temporary situation however consider it would be detrimental to the safety of users of the highway for a significant period of time. Construction traffic can often cause some disruption to residents living near sites however this is only for a temporary period (with the scale of development often indicating the length of this time frame). In addition to the consideration that this impact is temporary and with the imposition of necessary conditions including the agreement of a Construction Management Plan and Deliveries Management Plan and a requirement on the developer to repair any damage to the highway, it is not considered that the local planning authority could justify a reason for refusal on these grounds.
- 7.21 In relation to traffic impact, the Highways Authority recognise the proximity of the site to the Melton signalised crossroads (junction of the A1152 and B1438) which, as detailed in the submitted Transport Assessment, suffers from congestion (over-capacity). They comment that the proposal will impact upon the junction, and increase delay, particularly on The Street. The increase in delay is significant (over 30 seconds on The Street in the future scenario) and therefore should be mitigated in accordance with NPPF 108 (now para. 110 of NPPF 2021). They accept that it would not be proportionate to the scale and impact of this development to provide a junction improvement scheme, so the scheme

should provide measures to improve sustainable travel opportunities for the occupiers of the development and reduce the need for motor vehicle use. SCLP7.1 relating to Sustainable Transport sets out that a Transport Statement will be required for development of 50 - 80 dwellings and a Transport Assessment and Travel Plan will be required for developments of over 80 dwellings. While this development is not of a scale such that a travel plan is required, any reserved matters application should include a transport statement and the developer should be encouraged to incorporate any ideas to improve and/or encourage sustainable travel options for future residents. The applicant has indicated that they would be prepared to provide two cycles and secure cycle storage for each dwelling. In addition to those conditions previously recommended it is therefore considered that a further condition requiring a Residents Travel Pack to be agreed and provided for each new dwelling.

- 7.22 The site is located close to Melton Railway Station and the Highways Authority emphasise the need for the development to maximise the opportunity for occupiers to use it as an alternative to motor vehicle travel (in accordance with NPPF 110). The submitted Transport Assessment alludes to a footway connection from the site to Wilford Bridge Road as part of the site Masterplan (page 16) however this is not proposed at this stage due to this link requiring access across land not in the applicant's ownership. This option does remain possible for the future, if and when the land to the south becomes available. The Highways Authority consider this to be essential for the residential development.
- 7.23 The Riduna Park development has provided a pedestrian refuge to aid pedestrian crossing of Wilford Bridge Road and access to the Railway Station. The Railway Station does not benefit from a segregated footpath from the platform to the footway on Wilford Bridge Road and the Highways Authority consider this should also be provided (via Section 106 contribution) in order to give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible - to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use NPPF 112. Therefore, a Section 106 Contribution of £10,000 is included in order to provide the above footpath connection at the railway station.
- 7.24 In respect of Paragraph 111. of the NPPF, this states "*Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*". The Highway Authority have not objected based on a conflict with this paragraph and therefore it is unlikely that they would defend such a reason for refusal at appeal.
- 7.25 While the local planning authority understands and sympathises with the objections raised by the Highways Authority, it is not considered that any of these reasons are sufficient to warrant refusal of the scheme that is allocated. The proximity of the site to the station is a benefit in relation to sustainable travel options however without a direct link from the residential properties, the journey time for pedestrians would be considerably longer and this may deter some use of the station or increase private car use. Although there is not currently a direct link from the residential dwellings to the station, if, in the future the remainder of the allocated site gets developed, it is possible that such a link could be provided at that stage. Any opportunity for this should be incorporated into the final design of the scheme.

- 7.26 The Council has recently consulted on a draft Cycling and Walking Strategy SPD. This identifies Melton as part of a key corridor for cycling and walking infrastructure to be improved. Part of this involves a connection from Melton Train Station to Melton Park utilising existing bridleways 10 and 11. Directly in relation to the MEL20 allocation, it identifies points for improvement as follows:
- Segregated cycling and walking infrastructure along Wilford Bridge Road, from the Melton Road Crossroads through to Melton Railway Station with a crossing point should be introduced on Wilford Bridge Road outside Melton Railway Station to ensure pedestrian and cycle access into the Station.
  - Introduce safe and secure cycle storage at Melton Railway Station.
  - Introduce segregated cycling and walking infrastructure through MEL20, linking Bridleway 10 to the proposed segregated cycling and walking infrastructure along Wilford Bridge Road.
  - Bridleway 10 should be widened and resurfaced to accommodate cycling and walking.
- 7.27 While this document is not yet adopted nor is there any specific requirement on the applicant for this application to provide all or any of these improvements, the applicant has indicated that a pedestrian and cycle link will be provided to the north of the site to access bridleway 10, that the layout will enable the route to be continued south through the site to potentially link with the remainder of the allocated site at a later date. The applicant has also indicated that they would be receptive to the idea of installing a secure cycle storage facility at the station as part of the mitigation aspects of this application which is again recognised as a point for improvement. Given the S106 has been agreed, this could be achieved by a 'Grampian' condition.

Proposed claim Ground 2: The Planning Officer advised members on an inaccurate assessment of adverse appeal costs.

- 7.28 It is claimed that the advice given to Members during the Planning Committee South meeting of 30 March 2021 in relation to a (then) recent appeal decision (Appeal Ref: APP/E2734/W/20/3260624 in Harrogate) that if Members refused the application, the Council would lose the appeal and there would be an award of costs against the Council. The letter goes on stating that the Harrogate case was different to this case as in the Harrogate case, the local Highways Authority did not raise an objection. As costs are only awarded when a party has behaved unreasonably, it is the claimants view that it would be impossible for the appellant to be awarded costs in a case where the local planning authority would be giving due regard to a statutory consultee. It is claimed that this misled the Committee in a serious way.
- 7.29 The Council replied to this claim as follows: "As you note in your letter, this was a reference to the Harrogate case, where, as Mr Ridley correctly explained to the Committee, the local planning authority had a costs order made against it for unreasonably refusing permission for development on an allocated site where there were no sustainable grounds for doing so. In that sense it was clearly appropriate for officers to invite a comparison with the Proposed Development, particularly given their advice described above. Appeal decisions are capable of being relevant planning considerations and, given the similarities, there can be no argument that the Council acted irrationally in taking it into account.

- 7.30 The fact that there was not a highways objection in the Harrogate case was of no consequence. As the above extract from the Recording clearly shows, officers did not suggest that the relevance of the case lay in its treatment of highways issues.”
- 7.31 There are no further planning considerations or matters to raise regarding this point.

#### Additional consultee responses

##### Network Rail

- 7.32 Following the previous Committee Meeting discussing this proposal, Network Rail has raised concerns in relation to the potential impact from the proposed development on the usage and safety of Ellingers No.31 crossing, which is situated adjacent to the south eastern corner of the application site. The proposed footpath link to the neighbouring Bridleway was originally proposed to be located at the eastern side of the application site, as indicated by MEL20 but given concerns regarding this raised by Natural England and protection of the Deben Estuary SPA and Ramsar Sites, the proposed link to the Bridleway is now indicatively located to the north of the site. While this would not stop increased traffic at the rail crossing (in the same way that it would not stop people from using this route to access the River Deben), it does make it a less attractive route and indicate an alternative.
- 7.33 It is understood that the developer is open to speaking with Network Rail regarding any potential benefits to the safety of the crossing that may be achievable as a result of the development. If this is possible, details could be provided within any subsequent reserved matters application.

##### Natural England

- 7.34 At the time of the application was considered previously, the Council were awaiting a response from Natural England on its Appropriate Assessment. Natural England were provided with the Council's Appropriate Assessment in relation to the Habitats Regulations Assessment of the development and its potential impact, from recreational disturbance on the nearby European Protected Sites. This consultation was in line with the Councils consultation flowchart that has previously been agreed with Natural England whereby they are consulted with for schemes of over 50 dwellings. Following this, Natural England have confirmed that, subject to appropriate mitigation as proposed, they have no objection to the proposal. These measures include:
- A Construction Environment Management Plan (CEMP).
  - A Landscape and Ecological Management Plan (LEMP).
  - A Recreational Mitigation Strategy.
  - The provision of details of the Sustainable drainage systems (SuDS) strategy for the site in line with the requirements of the Lead Local Flood Authority.
  - A financial contribution of £17,667.10 to the Suffolk Coast RAMS, either via upfront (S111) payment or S106 agreement.
- The RAMS payment is included within the Section 106 Agreement.

##### Forestry Commission

- 7.35 The additional response from the Forestry Commission was not directly related to the proposal but more related to a re-stocking notice they have served following unauthorised felling. The latest comment confirms that a site visit was carried out in October 2020 and found it to be compliant with the restocking notice.

## **8 Conclusion**

- 8.1 The application is being presented to Members again following receipt of a letter indicating that any formal decision would be subject to a Judicial Review. As detailed in this report the Council disputes the proposed claims however it was considered that because of the issues raised following the earlier meeting, the receipt of further local representations and that the required S106 Agreement wasn't concluded, the application would be re-considered by Members.
- 8.2 The additional comments made in relation to the application are detailed above with the most numerous of these relating to highways matters. While the Highways Authority maintain their objection on three specific matters, the objection does not relate to the principle of access to the site being through St. Andrews place. The applicant has also included some minor improvements to the proposals following the previous Committee resolution including further off-site improvement works to St Andrews Place and the provision of secure cycle storage at Melton Railway Station.
- 8.3 Other outstanding issues such as seeking confirmation from Natural England that they had no objections and the completion of a S106 Agreement to secure a contribution to the Suffolk Coast RAMS, affordable housing and a highways improvement contribution are no longer outstanding. No additional material considerations have been raised which indicate that the application should now be refused.
- 8.4 Despite the objection from the highways authority, it is detailed above why the recommendation is for approval contrary to these comments. The site is allocated for residential development in the Melton Neighbourhood Plan and no other material considerations indicate that the proposal should now be refused.

## **9 Recommendation**

- 9.1 APPROVE subject to the conditions below: (note: while this report focuses on the main issues raised since the previous meeting, the list of conditions now proposed is provided in full).

### **Conditions:**

1. Application for approval of any reserved matters must be made within three years of the date of this outline permission and then;  
The development hereby permitted must be begun within either three years from the date of this outline permission or within two years from the final approval of the reserved matters, whichever is the later date.  
Reason: To comply with section 92 of the Town and Country Planning Act 1990.
2. Details relating to the layout, scale, appearance and landscaping of the site (the "reserved matters") shall be submitted to and approved by the Local Planning Authority before any development is commenced.  
Reason: To comply with Sections 91 and 92 of the 1990 Act.

3. No part of the development shall be commenced until details of the accesses (including the position of any gates to be erected and visibility splays provided) have been submitted to and approved in writing by the Local Planning Authority. The approved accesses shall be laid out and constructed in its entirety prior to occupation. Thereafter the accesses shall be retained in their approved form.  
Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.
4. Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.  
Reason: To ensure that roads/footways are constructed to an acceptable standard.
5. No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.  
Reason: To ensure that satisfactory access is provided for the safety of residents and the public.
6. Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.  
Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.
7. Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Pack (RTP). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information, personalised Travel Planning and a multi-modal travel voucher.  
Reason: In the interest of sustainable development as set out in the NPPF, and Policy SCLP7.1 of the East Suffolk Council - Suffolk Coastal Local Plan.
8. Before the development is commenced details of the areas to be provided for purposes of loading, unloading, manoeuvring and parking of vehicles and secure covered cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.  
Reason: To ensure that sufficient space for the on-site parking of vehicles is provided and maintained in order to ensure the provision of adequate on-site space for the parking and manoeuvring of vehicles where on-street parking and manoeuvring would be detrimental to highway safety to users of the highway.
9. No part of the development shall be commenced until details of the proposed off-site highway improvements to St Andrew's Place as indicatively shown on drawing no. 4465-0104 P07 have been submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall be laid out and constructed in its entirety prior to the occupation of any property.

Reason: To ensure that the off-site highway works are designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

10. No part of the development shall be commenced until a photographic condition survey of the highway fronting and near to the site has been submitted to and approved in writing by the Local Planning Authority.  
Reason: In the interest of highway safety, to ensure that damage to the highway as a result of the development is repaired at the developer's cost and satisfactory access is maintained for the safety of residents and the public.
11. All HGV delivery traffic movements to and from the site over the duration of the construction period shall be subject to a Deliveries Management Plan which shall be submitted to the Local Planning Authority for approval a minimum of 56 days before any deliveries of materials commence. No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan. [The site operator shall maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.]  
Reason: In the interests of highway safety, to reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.
12. Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:
  - a) parking and turning for vehicles of site personnel, operatives and visitors
  - b) loading and unloading of plant and materials
  - c) piling techniques (if applicable)
  - d) storage of plant and materials
  - e) provision and use of wheel washing facilities
  - f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
  - g) site working and delivery times
  - h) a communications plan to inform local residents of the program of works
  - i) provision of boundary hoarding and lighting
  - j) details of proposed means of dust suppression
  - k) details of measures to prevent mud from vehicles leaving the site during construction l) haul routes for construction traffic on the highway network and
  - m) monitoring and review mechanisms.
  - n) Details of deliveries times to the site during construction phase"Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.
13. Concurrently with the submission of the first reserved matters application, details of secure cycle storage to be provided at Melton Railway Station shall be submitted to and approved in writing by the local planning authority. No residential dwelling hereby



approved shall be occupied until the approved secure cycle storage has been provided in its entirety.

Reason: To enhance the sustainable travel options available to residents of the new development and to improve local sustainable travel infrastructure.

14. Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Ecological Impact Assessment (EcIA) (Huckle Ecology, July 2020) as submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

15. No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure that nesting birds are protected.

16. Commensurate with the first Reserved Matters application, a "lighting design strategy for biodiversity" for the development shall be submitted to and approved in writing by the local planning authority. The strategy shall:

a) identify those areas/features on site that are particularly sensitive for biodiversity likely to be impacted by lighting and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: To ensure that impacts on ecological receptors from external lighting are prevented.

17. No development shall take place (including any demolition, ground works, site clearance) until a method statement for Reptile Mitigation has been submitted to and approved in writing by the local planning authority. The content of the method statement shall include the:

- a) purpose and objectives for the proposed works;
- b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
- c) extent and location of proposed works shown on appropriate scale maps and plans;
- d) timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- e) persons responsible for implementing the works;

- f) initial aftercare and long-term maintenance (where relevant);
- g) disposal of any wastes arising from works.

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To ensure that reptiles are adequately protected as part of the development.

18. Commensurate with the first Reserved Matters application a construction environmental management plan (CEMP: Biodiversity) will be submitted to and approved in writing by the local planning authority. No development shall take place (including demolition, ground works, vegetation clearance) until the CEMP (Biodiversity) has been approved. The CEMP (Biodiversity) shall be based on up to date ecological survey information and shall include the following:
- a) Risk assessment of potentially damaging construction activities.
  - b) Identification of "biodiversity protection zones".
  - c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
  - d) The location and timing of sensitive works to avoid harm to biodiversity features.
  - e) The times during construction when specialist ecologists need to be present on site to oversee works.
  - f) Responsible persons and lines of communication.
  - g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
  - h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure that ecological receptors are adequately protected as part of the development.

19. A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to any occupation of the development. The content of the LEMP shall include the following:
- a) Description and evaluation of features to be managed.
  - b) Ecological trends and constraints on site that might influence management.
  - c) Aims and objectives of management.
  - d) Appropriate management options for achieving aims and objectives.
  - e) Prescriptions for management actions.
  - f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
  - g) Details of the body or organisation responsible for implementation of the plan.
  - h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in

accordance with the approved details.

Reason: To ensure that the long-term ecological value of the site is maintained and enhanced.

20. Commensurate with the first Reserved Matters application an Ecological Enhancement Strategy, addressing how ecological enhancements will be achieved on site, will be submitted to and approved in writing by the local planning authority. Ecological enhancement measures will be delivered and retained in accordance with the approved Strategy.

Reason: To ensure that the development delivers ecological enhancements.

21. No development shall take place until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy SCLP11.7 of the Suffolk Coastal Local Plan and the National Planning Policy Framework (2019).

22. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition 23 and the provision made for analysis, publication and dissemination of results and archive deposition.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy SCLP11.7 of the Suffolk Coastal Local Plan and the National Planning Policy Framework (2019).

23. Prior to the commencement of development of the site a Management Plan shall be submitted to the Local Planning Authority for approval in writing, detailing the mechanism for maintenance of all open and communal space within the site. The management of such shall be carried out in accordance with the approved details in perpetuity.

Reason: In the interest of the visual amenity of the site and to ensure proper maintenance.

24. Concurrently with the first submission of the reserved matters, a tree survey and any tree protection measures shall be submitted to and approved in writing by the local planning authority. Any tree protection measures identified shall be implemented and retained during construction.

Reason: To ensure appropriate protection of trees during construction in accordance with BS5837.

25. The mitigation measures identified in section 5.4 of the Air Quality Report referenced 15533-SRL-RP-YQ-01-S2-P1 in relation to construction dust shall be adhered to at all times during the construction phase.

Reason: in the interest of amenity and protection of the local environment – the dust arising from development could be significant given the earthworks required.

26. Concurrently with the submission of the reserved matters, details of electric vehicle charging points shall be submitted to and approved in writing by the local planning authority. The electric vehicle charge points shall be installed and made available for use prior to occupation of the dwelling to which they relate and shall be retained.

Reason: To help reduce the impact on Local Air Quality.

27. Concurrently with the submission of the reserved matters a noise survey shall be submitted to assess the suitability of locating residential dwellings on the application site and where necessary make recommendations for layout, orientation or other noise mitigation measures to ensure that the new housing does not suffer unreasonable loss of amenity (as a result of potential noise and disturbance from Bye Engineering, Brick Kiln Lane). The survey shall be undertaken by a competent person and shall include periods for daytime as 0700-2300 hours and night-time as 2300-0700 hours. All residential units shall thereafter be designed so as not to exceed the noise criteria based on BS8233 2014 given below:

- Dwellings indoors in daytime: 35 dB LAeq,16 hours
- Outdoor living area in day time: 55 dB LAeq,16 hours
- Inside bedrooms at night-time: 30 dB LAeq,8 hours (45 dB LAmay)
- Outside bedrooms at night-time: 45 dB LAeq,8 hours (60 dB LAmay)

Reason: To ensure that the new development can be integrated effectively with existing businesses such that unreasonable restrictions are not placed on existing businesses as a result of development.

28. Concurrently with the first submission of reserved matters, details of the proposed housing mix shall be submitted to the local planning authority for approval. These details shall include the size of proposed dwelling, the size, location and tenure of affordable dwellings and demonstrate how the development will contribute to meeting the needs of older people including providing at least 50% of the dwellings meeting the requirements for accessible and adaptable dwellings under Part M4(2) or M4(3) of the Building Regulations for accessible and adaptable dwellings.

Reason: In order that the development will meet the needs of all groups within the community in accordance with SCLP5.8.

29. Prior to commencement of the hereby approved development, a detailed sustainability and energy statement shall be submitted to and approved in writing by the local planning authority. The statement shall detail how the dwellings hereby permitted achieve best practice sustainability standards with regard to water, materials, energy, ecology and adaptation to climate change.  
Development shall be undertaken in accordance with the approved statement, unless otherwise approved in writing by the local planning authority.  
Reason: To ensure a sustainable standard of design interest of addressing climate change to secure sustainable development in accordance with Policy SCLP9.2 of the East Suffolk Council – Suffolk Coastal Local Plan (2020).
30. Prior to first occupation of the hereby approved development, details of all measures that have been completed as stated in the sustainability and energy statement (approved under Condition 31), shall be submitted to and approved in writing by the local planning authority.  
Reason: To ensure the finished development implements the approved sustainable measures to comply with Policy SCLP9.2 of the East Suffolk Council – Suffolk Coastal Local Plan (2020).
31. Prior to first occupation of the hereby approved development, evidence of energy performance and water efficiency standards shall be submitted to, and approved in writing by, the local planning authority.  
The dwellings within the hereby approved development should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day, as measured in accordance with a methodology approved by Building Regulations Approved Document G. Exceptions should only apply where they are expressed in the Building Regulations or where applicants can demonstrate, to the satisfaction of the Council, that it is not viable or feasible to meet the standards.  
Reason: To ensure that the finished dwellings comply with Policy SCLP9.2 of the East Suffolk Council – Suffolk Coastal Local Plan (2020) and to ensure Building Control Officers and Independent Building Inspectors are aware of the water efficiency standard for the dwellings.

**Informatives:**

1. The Local Planning Authority has assessed the proposal against all material considerations including planning policies and any comments that may have been received. The planning application has been approved in accordance with the objectives of the National Planning Policy Framework and local plan to promote the delivery of sustainable development and to approach decision taking in a positive way.
2. East Suffolk Council is a Community Infrastructure Levy (CIL) Charging Authority.

The proposed development referred to in this planning permission may be chargeable development liable to pay Community Infrastructure Levy (CIL) under Part 11 of the Planning Act 2008 and the CIL Regulations 2010 (as amended).

If your development is for the erection of a new building, annex or extension or the change of use of a building over 100sqm in internal area or the creation of a new dwelling, holiday let of any size or convenience retail, your development may be liable to pay CIL and you must submit a CIL Form 2 (Assumption of Liability) and CIL Form 1 (CIL Questions) form as soon as possible to [CIL@eastsuffolk.gov.uk](mailto:CIL@eastsuffolk.gov.uk)

A CIL commencement Notice (CIL Form 6) must be submitted at least 24 hours prior to the commencement date. The consequences of not submitting CIL Forms can result in the loss of payment by instalments, surcharges and other CIL enforcement action.

CIL forms can be downloaded direct from the planning portal:

[https://www.planningportal.co.uk/info/200136/policy\\_and\\_legislation/70/community\\_infrastructure\\_levy/5](https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5)

Guidance is viewable at: <https://www.gov.uk/guidance/community-infrastructure-levy>

3. The applicant is advised that the proposed development may require the naming of new street(s) and numbering of properties/businesses within those streets and/or the numbering of new properties/businesses within an existing street. This is only required with the creation of a new dwelling or business premises. For details of the address charges please see our website [www.eastsuffolk.gov.uk/planning/street-naming-and-numbering](http://www.eastsuffolk.gov.uk/planning/street-naming-and-numbering) or email [llpg@eastsuffolk.gov.uk](mailto:llpg@eastsuffolk.gov.uk)
4. The proposed development will require land drainage consent in line with the Board's byelaws (specifically byelaw 3). Any consent granted will likely be conditional, pending the payment of a Surface Water Development Contribution fee, calculated in line with the Board's charging policy.  
([https://www.wlma.org.uk/uploads/WMA\\_Table\\_of\\_Charges\\_and\\_Fees.pdf](https://www.wlma.org.uk/uploads/WMA_Table_of_Charges_and_Fees.pdf)).  
The presence of several watercourse which have not been adopted by the Board (a riparian watercourse) adjacent to the Eastern and Southern site boundaries are noted. If (at the detailed design stage) the applicant's proposals include works to alter the riparian watercourse, consent will be required under the Land Drainage Act 1991 (and byelaw 4).

## **Appendices**

Appendix A(1) – Planning Committee South report 30 March 2021

Appendix A(2) – Extract from the Planning Committee South Minutes 30 March 2021

Appendix B - Letter from Birketts to East Suffolk Council 5 May 2021

Appendix C – Letter from East Suffolk Council to Birketts 26 May 2021

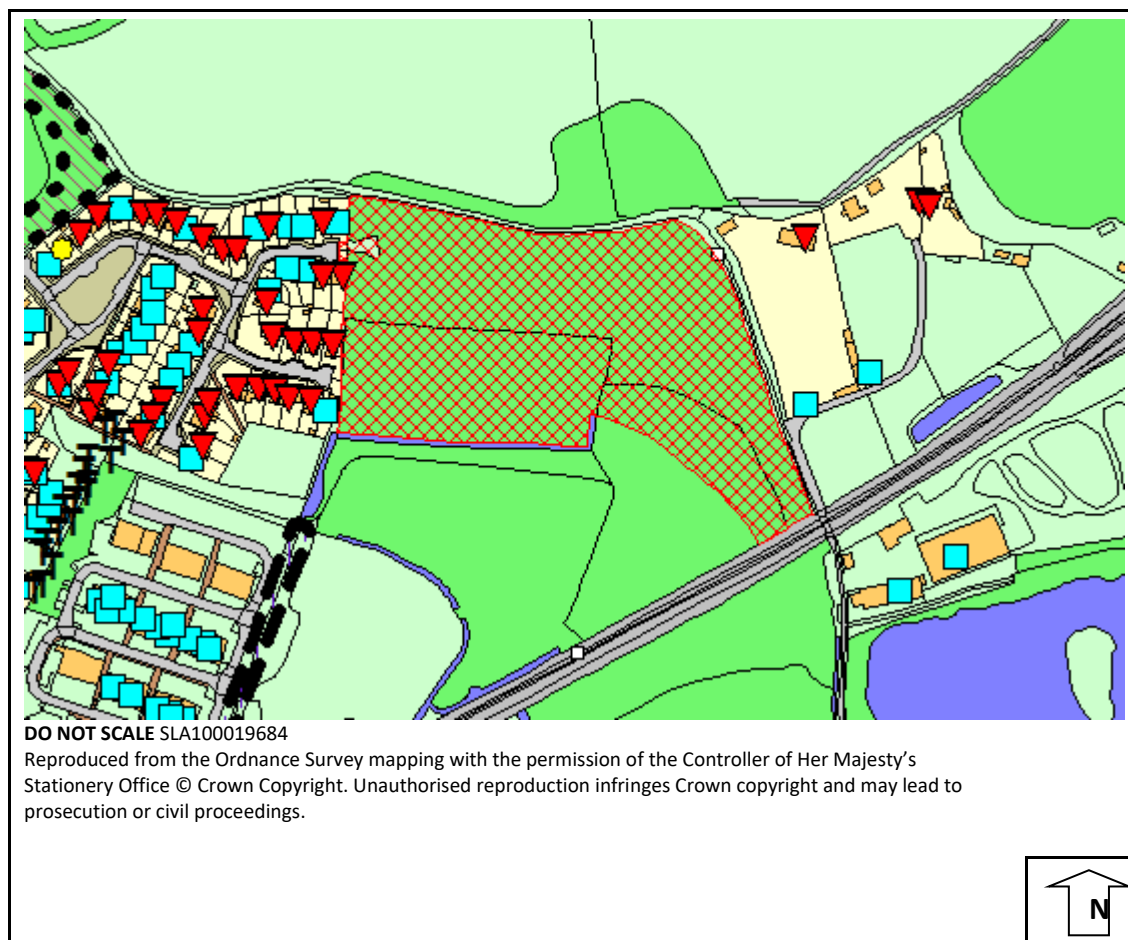
Appendix D – Letter from Birketts to East Suffolk Council 25 June 2021

Appendix E – Letter from East Suffolk Council to Birketts 16 July 2021





## **Background information**

See application reference DC/20/1831/OUT on [Public Access](#)

## Map



## Key

-  Notified, no comments received
-  Objection
-  Representation
-  Support