



Appeal Decision

Hearing Held on 13 March 2019

Site visit made on 13 March 2019

by Graham Chamberlain BA MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 27th March 2019

Appeal Ref: APP/J3530/W/18/3212430

Land between 73 and 101 Bucklesham Road, Kirton, Suffolk IP10 0PF

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Trustees of GH Paul 1964 Settlement against the decision of Suffolk Coastal District Council.
 - The application Ref DC/18/0105/FUL, dated 10 January 2018, was refused by notice dated 27 March 2018.
 - The development proposed is described as 'erection of 10 new dwellings and creation of new vehicular access and internal road'.
-

Decision

1. The appeal is dismissed.

Application for Costs

2. An application for an award of costs was made by Suffolk Coastal District Council against the Trustees of GH Paul 1964 Settlement. This application will be the subject of a separate Decision.

Preliminary Matters

3. Since the Council issued its decision the revised National Planning Policy Framework (the Framework) was published. The Council and appellant were afforded an opportunity to supplement their statements in respect of this¹, and discuss it at the hearing. Further evidence was submitted at the hearing² that was directly relevant to the matters being discussed, was not extensive in scope and was capable of being addressed by the parties. I therefore accepted it as no party was prejudiced by me doing so.
4. A draft Statement of Common Ground was tabled at the hearing. Sections 1 and 2 had been agreed subject to a slight correction³. Section 3 had not been agreed as it effectively set out the appellant's case regarding the five-year housing land supply position. I have considered the document on this basis.

¹ The Council supplied an updated position on whether it could demonstrate a five-year housing land supply by email on the 6 March 2019 whereas the appellant table information on this matter at the hearing as Part 3 of the draft Statement of Common Ground

² The Council referred to an extract from a Landscape Institute guidance and another extract from its Settlement Sensitivity Assessment Volume 2 2018

³ Reference to Policy SP19 had been omitted in error from Paragraph 2 on Page 7

5. Amended drawings were deposited with the appeal. These propose reconfigured visibility splays with a frontage hedge replanted behind. I have accepted this amendment as it was minor in scope. Following agreement from the parties present at the hearing, I undertook my site visit on an unaccompanied basis as I was able to see all I needed to from public land.

Main Issues

6. At the outset of the hearing the Council confirmed that the amended drawing submitted by the appellant demonstrates that a safe and suitable access could be achieved subject to the imposition of planning conditions. The Council's position flows from advice from the Local Highway Authority (LHA) and substantive technical evidence was not presented to counter this. Consequently, I am satisfied this matter has been addressed and therefore it has not been considered further.
7. During the hearing I sought confirmation regarding the findings of the ecological survey prepared by Geosphere Environmental Ltd (dated 8 December 2016) and submitted by the appellant. In view of the subsequent discussion I have addressed the effect on biodiversity as a main issue. Accordingly, the main issues in this appeal are:
 - Whether the proposed development would be in a suitable location with reference to development plan policies;
 - Whether the proposed development would make adequate provision for affordable housing;
 - The effect of the proposed development on the character and appearance of the area, including the landscape;
 - Whether the proposed development would preserve the setting of Kirton Manor, a Grade II listed building;
 - The effect of the proposed development on biodiversity; and
 - If there is a conflict with the development plan, whether there are material considerations that indicate a decision should be taken other than in accordance with the development plan.

Reasons

Whether the appeal site would be a suitable location for housing

8. Policy SP1 of the CSDMP⁴ 'comprises the foundations around which the Core Strategy framework is built'⁵. It sets out the overarching objectives and strategy for development in the district from which the other policies in the document flow. This includes an aim to relate new housing development to employment transport and infrastructure, achieve a balance between housing and employment growth, reduce the need to travel and conserve and enhance the area's natural, historic and built environment.
9. Policy SP19 of the CSDMP builds on the strategy outlined in Policy SP1 by directing development through a settlement hierarchy. The proportion of total

⁴ Suffolk Coastal District Local Plan Core Strategy and Development Management Policies Development Plan Document July 2013

⁵ Paragraph 3.17 of the CSDMP

proposed housing growth identified within the hierarchy for the countryside is identified as being 'minimal'. The 'countryside' is defined in table 4.1 as being the area outside the settlements and this includes the appeal site, which is located outside the settlement boundary of Kirton.

10. Policy SP19 includes a footnote that states that *windfall (unidentifiable small sites) is expected to add to the new housing provision in the district*. The terms 'windfall' and 'small sites' are not defined. Nevertheless, in my view the windfall developments being referred to are those permitted by other policies in the plan such as small schemes within the settlement boundaries, barn conversions, rural exception sites and infilling under Policy DM4. It should not be taken as an indication that Policy SP19 is permitting housing in the countryside in addition to that permitted by other policies in the plan.
11. Policy SP27 of the CSDMP relates to Key and Local Service Centres such as Kirton. It states that housing is to be permitted within the defined physical limits (settlement boundaries) or where there is proven local support in the form of allocations. Exceptions will be made for affordable housing. The appeal scheme is outside the settlement boundary, has not been allocated and is not exclusively for affordable housing. As such, the proposal would not glean support from Policy SP27(b).
12. Part (d) of Policy SP27 states that some organic development may occur where opportunities within the physical limits are severely limited. It goes on to confirm that this may be in the form of the inclusion of potential sites within the physical limits boundaries when drawn or development in adjacent clusters. In my view, part (d) sets out the only two types of organic development which would be permitted by Policy SP27. It is not suggested within the policy that these are examples and therefore other forms of organic development could occur. Such an interpretation would leave the term 'organic development' ill-defined and too open as a concept.
13. The appeal site has not been incorporated into the settlement of Kirton through a revision of the settlement boundary and it would not meet the criteria in Policy DM4 of the CSDMP to be considered infilling within a cluster. For example, it would be too large a scheme and, for the reasons I go into later, it would result in a harmful visual intrusion into the surrounding landscape. Accordingly, the appeal scheme would not involve the two types of organic development envisaged by Policy SP27(d).
14. Paragraphs 3.119 - 3.122 of the Felixstowe Peninsula Area Action Plan Development Plan Document 2017 (FAAP) explain that given the level of growth in the village to date, any future growth is expected to be windfall sites within the settlement boundary of the village. Policy FPP2 of the FAAP, which relates to physical limits boundaries in the plan area, needs to be read in this context. It states that the physical limits boundaries identify the part of the settlement to which new housing development is directed and that new residential development outside the boundaries will be strictly controlled in accordance with Policy SP29 of the CSDMP.
15. Policy SP29 of the CSDMP states that the strategy for new development outside the physical limits of settlements is that it will be limited to that which needs to be located there and it accords with other policies in the CSDMP, such as those promoting rural business or the conversion of rural buildings. The appeal scheme does not need to be located in the countryside and it is not the type of

development expressly permitted in principle by other policies elsewhere in the plan. Thus, the appeal scheme would be at odds with Policy SP29.

16. Policy DM3 of the CSDMP flows from Policies SP19 and SP29 and lists the types of development that would be permitted in the countryside, such as replacement dwellings, the sub division of larger dwellings, affordable housing exception sites, conversions and minor infilling in clusters. The appeal scheme would not be any of these types of development. Policy DM3 also permits development that accords with Paragraph 79 of the Framework. The appeal scheme would not amount to any of the types of development listed therein but this is of little consequence as Paragraph 79 is not engaged because the appeal site is not isolated.
17. In conclusion, the proposal would not adhere to Policies SP1, SP19, SP27, SP29 and DM3⁶ of the CSDMP or FPP2 of the FAAP. These policies are consistent with the Framework in that they set out the plan led approach to development in the district. Thus, the proposal would amount to a notable departure from the development plan that would harmfully undermine the adopted and evidenced based spatial strategy for housing therein and the consistency and relative certainty that should flow from a plan led approach to the location of new development.

Whether the proposal would make adequate provision for affordable housing

18. Policy DM2 of the CSDMP requires 1 in 3 homes within a housing scheme to be affordable homes. This requirement is consistent with Paragraph 62 of the Framework, which permits affordable housing to be sought as part of major development⁷. It was a point of agreement at the hearing between the Council and the appellant that the appeal scheme should provide three affordable homes as this is necessary to make the development acceptable (by adhering to development plan policy), would be directly related to the development and would be fair in scale and kind. I agree with this analysis.
19. For affordable housing to be provided effectively, arrangements must be made to transfer it to an affordable housing provider, to ensure that appropriate occupancy criteria are defined and enforced, and to ensure that it remains affordable to first and subsequent occupiers. The legal certainty provided by a planning obligation makes it the best means of ensuring that these arrangements are effective.
20. A planning obligation has not been submitted. Instead, the Council and appellant have suggested that a planning condition could be imposed to secure the affordable housing and a draft was tabled at the hearing. The condition refers to a 'scheme' for the provision of affordable housing and a requirement for further 'arrangements' relating to controls over who could subsequently occupy the dwellings. These are rather vague terms. It is likely that the 'scheme' and 'arrangements' referred to would require the relevant parties to enter into some form of legally binding obligation.
21. The Planning Practice Guidance advises that in exceptional circumstances a negatively worded planning condition requiring a planning obligation or other

⁶ The Council referred to Policy SP1A of the CSDMP in its reason for refusal, but I do not consider this policy is engaged as there are relevant development plan policies that are not out of date.

⁷ Major applications are defined in the glossary of the Framework as 10 or more homes.

agreement to be entered into before development can commence may be appropriate in the case of more complex and strategically important development. The appeal scheme is neither complex nor strategic and therefore a planning condition along these lines cannot be imposed to secure the affordable housing. Consequently, an appropriate mechanism to secure the adequate provision of affordable housing is not before me and therefore the proposal would be contrary to Policy DM2 of the CSDMP.

The effect of the proposed development on the character and appearance of the area, including the landscape

22. The appeal site encompasses part of a larger field, has a frontage onto Bucklesham Road and is surrounded on three sides by residential ribbon development. That said, there is an attractive view across the appeal site from Bucklesham Road over the largely undeveloped and gently undulating agricultural landscape around Kirton Hall and Kirton Brook. The appeal site is a positive component of this view and therefore has a scenic quality when experienced from Bucklesham Road, nearby properties and three public footpaths.
23. The field in which the appeal site is located is largely enclosed by hedges and slopes gently away from the road down towards Kirton Brook. The agricultural landscape to the west of Kirton, including the appeal site and its environs, is broadly characterised by small fields delineated by hedges. The Council's Settlement Sensitivity Analysis specifically identifies the field system as a feature and describes it as an enclosure pattern that is pre 18th Century and largely intact. The appeal site contributes positively to this landscape character.
24. Thus, in light of the foregoing, the appeal site can reasonably be considered as being part of a valued landscape when having regard to its scenic quality and intactness, factors outlined by the landscape institute to be considered when establishing if a landscape is valued or not. In this respect, it is justifiably part of a locally defined Special Landscape Area. The sites inclusion within the SLA may or may not have followed correct procedures but that does not diminish the value of the landscape for the purposes of my assessment.
25. The appeal scheme would introduce development where there is none currently and this would urbanise the appeal site and thus erode the intactness of the landscape. The development would also largely block the view across the landscape from Bucklesham Road and this would harm the scenic quality that can be experienced from this vantage point. These impacts would not be aided by the tightly packed composition of the development, whereby the properties would be arranged in a tight row with prominent intervening garages.
26. When considering the impact on landscape character I share the view of Mr Newton that it is the effect on the localised landscape around Kirton Brook that is more relevant to my assessment than the impact on the SLA as a whole, which is extensive. Therefore, the conclusion in the Landscape and Visual Impact Assessment (LVIA) regarding the 'impact significance' is too low. A finding of medium-low adverse would be more appropriate in the local context of the appeal site.
27. In respect of the visual impacts of the proposal, the visual envelope identified in the LVIA is broadly accurate. This demonstrates that some views of the development would be over the valued landscape centred on the brook. The

impacts classified in the LVIA from the specific viewpoints identified have been understated, particularly the impact from View Point 5. The impact from here would be major (in the winter months) as opposed to negligible because the houses would be highly visible. No doubt the negligible finding in the LVIA was because the assessment was undertaken when the trees were in full leaf. For similar reasons the development would be highly visible in View Point 1 during the winter months and moderately visible from View Point 6.

28. Planting a boundary hedge along the south western boundary of the appeal site would do little to mitigate the visual impact of the development because it would take time to mature and future residents are likely to want to keep it low due to the modest size of the proposed gardens and in order to take in the view. The dwellings would be too tightly arranged to enable planting in-between, which could otherwise break up the roof scape. The development would be viewed in the context of existing housing and could be regarded as a type of infilling. However, gaps of countryside between groups of housing is a characteristic of Bucklesham Road and the appeal scheme would erode this. Moreover, most of the proposed dwellings would sit further back from the road than the houses either side and this would appear somewhat discordant. Plot 1 in particular would jar with the grain of development along Bucklesham Road as it would be side on to the street. Overall the appeal scheme would have a notable and harmful visual impact in the local landscape and this would harm the character and appearance of the area.
29. In arriving at this view I acknowledge that the Council previously considered allocating the site for development at the Preferred Options consultation stage. The preliminary assessment of the Officer's engaged in that exercise was that a scheme of fifteen homes at the appeal site would not harm the character and appearance of the area. Nevertheless, the Council appears to have changed its view based on the information before it and its stated position is that the proposal would harm the character and appearance of the area. Regardless of the Council's shifting position and the reasons for this, I have come to my own view on the impact of the proposal on the landscape for the reasons given.
30. I therefore conclude that the appeal scheme would harm the character and appearance of the area, including the character and visual quality of the local landscape. Accordingly, it would not adhere to Policy SP15 of the CSDMP, which seeks to protect and enhance the various landscapes in the district. Policy SP15 is consistent with Paragraph 170 of the Framework.

Whether the proposal would preserve the setting of Kirton Manor

31. The appeal site is located to the south west of Kirton Manor, a Grade II listed building. In accordance with Paragraph 189 of the Framework, applicants are required to describe the significance of any heritage assets that may be affected by a development proposal, including its setting. The appellant failed to do this at the application stage and therefore the Council's sixth reason for refusal was added to its decision notice. The appellant has subsequently commissioned a Heritage Impact Assessment (HIA), which was submitted with the appeal.
32. The HIA indicates that Kirton Manor probably dates from the 17th Century and was part of an historic farm. The house has been severed from the barns and farm land that it was historically linked to. Nevertheless, given its historic use, the setting of the building includes the surrounding agricultural landscape as an

important component of how the building is understood and appreciated. This setting has been compromised to a notable extent by ribbon development along Bucklesham Road.

33. The currently undeveloped and open appearance of the appeal site provides some limited visual connectivity between Kirton Manor and the wider agricultural landscape. The appeal scheme would introduce built development into the appeal site that would erode the visual connectivity between Kirton Manor and the wider agricultural landscape. This would harm its setting when taken in isolation and when considered cumulatively with the other nearby development that has encroached into the setting of the building. I share the view expressed in the HIA that the harm would be less than substantial because it would be limited to the wider setting of Kirton Manor. The Council is also satisfied that the proposal would result in less than substantial harm in the manner described in the HIA. In accordance with Paragraph 196 of the Framework, I have weighed the less than substantial harm against public benefits later in this decision letter.

The effect on biodiversity

34. The application included a Preliminary Ecological Appraisal dating from 8 December 2016. It is therefore reasonably old and was not undertaken at the optimal time of year. Appendix 1 of the document explains the limitations of the report and states that it does not assess the presence or absence of species but is used to assess the potential habitat to support them. The report concludes that the appeal site may provide habitat for birds, bats and reptiles. Moreover, biological records confirm that a bat roost has been present in a mature pedunculate Oak tree located on the north western boundary of the appeal site. The report therefore recommends that further Phase 2 surveys are undertaken to establish the presence or otherwise of protected species and thus the significance of the appeal site as a habitat.
35. The Preliminary Ecological Appraisal has confirmed a reasonable likelihood of protected species being present because the habitats in the site would support them. The appeal scheme would involve significant works including the removal of the existing road side hedge and the construction of a service road and dwellings. Subsequent occupation would result in activity and light spillage. As such, the development is likely to affect protected species if they are present.
36. In these circumstances it is necessary to identify the presence or otherwise of protected species before granting planning permission so that any impacts and potential mitigation can be identified and fully understood. The absence of the Phase 2 surveys is therefore a significant omission. Without them, there is an unacceptable risk that the proposal could significantly harm biodiversity.
37. It would not be appropriate to secure the Phase 2 surveys through the imposition of a planning condition because it would prove difficult to retrospectively apply mitigation (the extent and nature of which is unknown) to a scheme that has been approved. For example, interested parties at the hearing suggested that Plot 10 is probably too close to the Oak tree if a bat roost is still present. Moreover, Circular 06/2005 - Biodiversity and Geological Conservation states that ecological surveys should only be left to a planning condition in exceptional circumstances, which do not apply in this case.

38. From the evidence before me I cannot conclude with any confidence that the proposal would conserve or enhance biodiversity and therefore I conclude that it would be contrary to Paragraphs 174 and 175 of the Framework.

Whether there are material considerations that indicate a decision should be taken other than in accordance with the development plan

Whether the Council can demonstrate a five-year housing land supply

39. Following discussions at the hearing the Council and the appellant agreed that when applying the standardised methodology in the Planning Practice Guide, the Council's annual housing need is 515 dwellings per annum. It was also agreed between these parties that a buffer of only 5% should be added, to ensure choice and competition, because the Housing Delivery Test results have confirmed that the Council has not significantly under delivered in the previous three years. Accordingly, the Annual Housing Need was agreed at being around 540 dwellings per annum.
40. The Council considers that 4,509 homes will be delivered in the district over the five-year period. The sites are listed in the Council's Housing Land Supply Assessment of June 2018 and this analysis followed a dialogue with developers. That quantum of delivery would give a housing supply of around 8.3 years. As a 'worst case' scenario the Council considers the supply of deliverable sites to be 3,314 as this was the conclusion of an Inspector in a reasonably recent appeal decision⁸ where the evidence was tested through an inquiry. This would give a housing supply of approximately 6.1 years.
41. Paragraph 74 of the Framework introduces a discretionary measure whereby the Council can confirm or 'fix' its five-year housing land supply for one year by agreeing an annual position statement. In doing so a 10% buffer is applied. When considered in its proper context and with reference to relevant guidance⁹, Paragraph 74 cannot reasonably be read as setting out the only means by which a Council can demonstrate a five-year housing land supply as required to by Paragraph 73 of the Framework.
42. The appellant does not consider the Council has correctly applied the definition of 'deliverable' in the glossary of the Framework to its housing supply sites. Particularly the second part, which relates to major outline permissions, allocations in a development plan and sites with permission in principle. It states that such sites should only be considered deliverable where there is clear evidence¹⁰ that housing completions will begin on site in five years. To my mind it is for the Council to seek the clear evidence if it intends to rely on such sites, as the requirement is upon the Council to demonstrate that it has a five-year housing land supply.
43. The appellant suggests that all allocated sites should be removed from the Council's list of deliverable sites as a matter of principle because they do not have planning permission (355 homes). In addition, it was suggested that I should remove from the list of deliverable sites all sites where the Council has stated the principle of development is accepted (775 homes) along with a

⁸ APP/J3530/W/17/3172629

⁹ Including Paragraph: 050 Reference ID: 3-050-20180913

¹⁰ The PPG states that clear evidence could be in the form of 1) any progress being made towards the submission of a planning application; 2) any progress on site assessment works; and 3) any relevant information about site viability, ownership constraints or infrastructure provision.

further fifteen sites with outline permission (609 homes). This would reduce the Council's list of deliverable sites to 2770. The appellant shifted position following the discussion at the hearing, where the Council was able to provide an update on some sites, including where permission had been granted, and this was accepted by the appellant¹¹.

44. It would not be appropriate to remove all allocated sites as a matter of principle as the definition of deliverable sites in the Framework does not advocate that course of action. Instead, each site should be considered on a case by case basis to establish the rate of delivery. The appellant has not sought to challenge the Council's conclusions on the allocated sites on a site by site basis as they have no evidence upon which to base such a challenge.
45. Although the Adastral Park development would include some complex highway infrastructure it would be appropriate to include some delivery within the five-year period in light of what I heard from the Council's case officer at the hearing. Moreover, I note that a previous Inspector included 210 homes after considering this matter following an inquiry. Upon reviewing the 15 outline sites it became apparent that the Council did not have clear evidence that completions would commence at all of them in the five-year period and many of the sites were removed by the previous Inspector.
46. On balance, and based on the evidence before me, the deliverable housing supply is likely to be closer to 3,314 than 4,509. However, it would not be as low as 2,770. Notwithstanding this, even if I accepted the appellant's analysis of deliverable sites in full, the Council would have a housing land supply for 5.13 years¹². The appellant acknowledged this at the hearing but considered the supply would fall beneath five years if a 10% lapse rate was applied to the housing requirement to account for under delivery by developers.
47. There is no requirement in planning policy to include a lapse rate¹³ and the Council has chosen not to because it actively seeks evidence on delivery rates from developers. Moreover, with the more rigorous definition of what can be considered 'deliverable', which in part requires clear evidence to be established, a lapse rate will often prove unnecessary because only genuinely deliverable sites will be included in the five-year supply. It would be double counting to impose the rigorous definition of 'deliverable', discount sites where there is no clear evidence of delivery and apply a lapse rate.
48. The Inspector in the Aldeburgh appeal did not impose a lapse rate because she applied the rigorous definition of what is deliverable and considered the Council's evidence in respect of the sites she included as being deliverable to be robust. In light of the foregoing, it is not appropriate to apply a lapse rate. Accordingly, even on the appellant's analysis of what are the deliverable sites, the Council has a five-year housing land supply and therefore the tilted balance in Paragraph 11(d) of the Framework is not engaged.

¹¹ The appellant had originally suggested removing 414 allocated sites, 834 sites where the 'principle of development is accepted' and 657 sites with outline permission

¹² 2770/540

¹³ The PPG makes reference to lapse rates in the context of preparing an Annual Position Statement as a possible assumption to test delivery rates or where there is no information from developers - Paragraph: 047 Reference ID: 3-047-20180913

Whether the benefits of the proposal would outweigh its harm

49. The proposal would deliver ten homes, but this would be a modest benefit given the Council are able to demonstrate a five-year housing land supply and is therefore in the process of significantly boosting the supply of housing. The residents of the appeal scheme could support the vibrancy and vitality of the local community and that of the local economy by supporting local facilities and services, albeit mostly in nearby villages. There would also be some benefits to the local construction industry.
50. However, evidence has not been submitted that outlines the practical local effect of this, for example there is nothing to suggest nearby services are failing for lack of patronage. Thus, the extent and significance of these benefits attracts moderate weight. The dwellings would be good quality modern homes, but this is to be expected and is not determinative. Similarly, the opportunity to name the development 'Homefield' is not a benefit of any notable weight.
51. Alternatively, the appeal scheme would harmfully undermine the spatial strategy in the development plan. It would also fail to deliver affordable housing. The proposal would also harm the character and appearance of the area and potentially harm biodiversity. There would also be less than substantial harm to the setting of Kirton Manor. I am required to give considerable importance and weight to the special regard I must have to the desirability of preserving the setting of this listed buildings¹⁴. Overall, the appeal scheme is a long way off presenting benefits that would outweigh its cumulative harm. This does not indicate that a decision should be made other than in accordance with the development plan.

Other Matters

52. Various concerns have been raised by interested parties in respect of highway safety, noise and sewerage capacity, which I have noted. However, given my findings above it has not been necessary for me to address these matters further as the appeal has failed on the main issues. Similarly, in light of my overall conclusions I have not undertaken an appropriate assessment as required by the Habitat Regulations¹⁵ as the findings would not alter the outcome of the appeal.

Conclusion

53. The proposed development would not accord with the development plan and there are no other considerations which outweigh this finding. Accordingly, for the reasons given, the appeal should not succeed.

Graham Chamberlain

INSPECTOR

¹⁴ See Sections 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990

¹⁵ The Conservation of Habitats and Species Regulations

APPEARANCES

FOR THE APPELLANT

Andrew Cann	Planning Direct
Nikki O'Hagan	Planning Direct
James Tanner	Hollins (Architect)

FOR THE LOCAL PLANNING AUTHORITY

Rachel Smith	Senior Planning Officer
Ben Woolnough	Major Sites and Infrastructure Manager
Nicolas Newton	Arboriculture and Landscape Manager

INTERESTED PARTIES

Paul Durrant	Local Resident
Julie Durrant	Local Resident
Raymond Long	Local Resident
Yvonne Long	Local Resident
Anne Smith	Local Resident
Jane Bartle	Local Resident
John Jay	Local Resident
Graham Walker	Local Resident
Jack Cade	Local Resident/Kirton Parish Council
Sheilia Fothergill	Local Resident
John Fothergill	Local Resident

DOCUMENTS SUBMITTED AT THE HEARING

1. Extract from Landscape Institute guidance on factors that can help identify a valued landscape
2. Extract from Settlement Sensitivity Assessment Volume 2: Suffolk Coastal Settlements - Alison Farmer Associates July 2018
3. Council's list of suggested planning conditions
4. Photographs of the public highway in the vicinity of the appeal site
5. Draft and unsigned version of the Statement of Common Ground
6. Suffolk Coastal District Council Housing Land Supply Assessment 1 April 2018 – 31 March 2023.