



Appeal Decision

Inquiry Held on 26 - 28 February and 1 April 2019

Site visit made on 1 April 2019

by Anne Jordan BA (Hons) MRTPI

an Inspector appointed by the Secretary of State

Decision date: 14th May 2019

Appeal Ref: APP/V2635/W/16/3166074

Land north of St Nicholas Close, Gayton, Norfolk

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by New Hall Properties (Eastern) Ltd against the decision of King's Lynn and West Norfolk Borough Council.
 - The application Ref 16/00647/OM, dated 31 March 2016, was refused by notice dated 15 September 2016.
 - The development proposed is described as '*outline application for up to 50 dwellings. All matters reserved except access*'.
 - This decision supersedes that issued on 20 December 2017. That decision on the appeal was quashed by order of the High Court.
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Decision

1. The appeal is dismissed.

Procedural Matters

2. Following the consent order quashing the previous appeal decision, the appeal is to be re-determined on the basis that the whole case is considered afresh. The quashed decision is treated as though it had not been made and is incapable of having any legal effect. The parties agree that consideration should be given to all of the original planning issues, not just those described in the consent order, namely the adequacy of the Inspector's reasoning in relation to Policy CS06. I will also take account of any new evidence or material changes in policy or circumstances since the first Inquiry.
3. The application is made in outline form, with all matters reserved apart from access. Prior to the first Inquiry, the appellant submitted amended plans which changed the site area by reducing the extent of the site. The Council are satisfied that this change does not deprive interested parties from making observations on the scheme. The appeal has therefore been determined on the basis of plan ref 018.SK.02 Rev P3 and revised plan ref 018.SK.01 P4.
4. During the first Inquiry, indicative plan, ref 018.SK.03 P1 was submitted. This shows the extent of an area of landscaping adjacent to the Church of St Nicholas intended as a landscaped buffer. I am satisfied that the inclusion of this additional plan would not prejudice the interests of any party to the appeal and so I have taken this into account in my decision.

5. During the Inquiry an updated Unilateral Undertaking was provided which related to the provision of affordable housing, public open space provision, sustainable urban drainage and habitat monitoring. I have also taken this into account in reaching a decision.
6. The village of Gayton is home to a number of heritage assets. The parties are in agreement that none, other than the Church of St Nicholas, would be impacted by the development proposal. Having regard to the position of these other assets in relation to the site, I see no reason to dispute this view.

Main Issues

7. Accordingly, the main issues for the appeal are:
 - Whether the proposed housing would be in an acceptable location having regard to development plan and national policies, and
 - The effect of the proposed development on the character and appearance of the surrounding area and on the Grade I listed Church of St Nicholas.

Reasons

The Location of Development

Policy Background

8. The development plan for the area is made up of the King's Lynn and West Norfolk Borough Council Local Development Framework – Core Strategy (2011) (CS) and the Site Allocations and Development Management Policies Plan (2016) (SADMP). Both plans predate the National Planning Policy Framework 2019 (The Framework). Paragraph 213 of The Framework makes it clear that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of The Framework. Due weight should be given to them according to their consistency with The Framework.
9. Policy CS01 of the CS sets out the spatial strategy for the Borough, which seeks to direct development to the most sustainable locations within a settlement hierarchy. Policy CS02 sets out the hierarchy of settlements from King's Lynn as a sub-regional centre, down to smaller villages and hamlets. Within this, Grimston and Pott Row with Gayton are together listed as a Key Rural Service Centre, commensurate with the facilities available within it. The policy supports limited growth of a scale and nature appropriate to secure the sustainability of each settlement within the development limits.
10. Policies CS06 and CS09 of the CS set out a strategy for development in rural areas. This makes provision for a minimum of 2,880 new homes in or adjacent to selected Key Rural Service Centres, with 660 new homes to be provided through allocations in the SADMP. Beyond the villages and in the countryside, in the interests of protecting the intrinsic character and beauty of the countryside, Policy CS06 is restrictive of development, but allows for development to support and enable rural enterprise and the conversion of existing buildings. Policy DM 2 of the SAMDP reiterates strict controls in relation to development boundaries and the circumstances where development will be accepted in principle.

11. The Framework seeks to deliver a sufficient supply of land for housing, directing development to locations where new housing will enhance and maintain the vitality of rural communities, whilst at the same time recognising the intrinsic character and beauty of the countryside.
12. I am satisfied that the strategy for development set out in Policies CS01, CS02 and CS06 of the CS and Policies DM 2 and DM 15 of the SAMDP balance the competing objectives of environmental protection and the need to provide housing which is supported by local services. By identifying areas where development would be best served by local services and imposing a policy of restriction outside development boundaries in the interests of environmental protection, these policies are not inconsistent with the aims of The Framework. Furthermore, the policies do not restrict housing provision to a defined level, instead seeking to establish a pattern of distribution for an identified minimum requirement.
13. The appellant disputes the weight that should be attributed to Policy CS06, and its daughter Policy DM 2, in light of recent case law¹ where, in paragraph 47 of this judgement, it is stated that The Framework does not include a blanket protection of the countryside for its own sake, and that in coming to a view, regard should be had to all the core planning principles. This is not in itself controversial.
14. Policies CS06 and DM 2 are intended to be read in conjunction with Policies CS01 and CS02 in order to achieve a sustainable pattern of development. I acknowledge that a settlement boundary policy, in isolation of other considerations, would not be wholly aligned with the more flexible and balanced approach implicit in the objectives outlined in The Framework. Policy CS06 provides for a relatively limited range of development and seeks to restrict others, including market housing. Nevertheless, it is clear in this case that the wider aims of Policies CS06 and DM 2 seek to restrict development in the countryside not as an aim in itself, but in order to protect its intrinsic character, and to support the vitality of existing communities. Insofar as the policies relate to these matters, I attribute them full weight.
15. Policy CS08 relates to all new development and seeks to ensure that the design and layout of new development reflects a wide range of matters which are key to implementing the principles of sustainable development including construction techniques, flood risk and the use of renewable energy technologies. Policy CS12 seeks to protect and enhance the Borough's environmental assets, including its landscape character and heritage assets. Policy DM 15 of the SADMP reiterates the need to enhance and protect the amenity of the wider environment, including its heritage and cultural value. These policies are wholly consistent with the objective of protecting and enhancing the natural built and historic environment explicit in The Framework and therefore carry full weight.
16. I heard at the Inquiry about the emergence of the Gayton and Gayton Thorpe Neighbourhood Plan (NP) and note that early work indicates an aspiration to keep the centre of the village open and undeveloped². However, the plan is still at a very early stage, and has not been subject to formal consultation

¹ Borough of Telford and Wrekin and Secretary of State [2016] EWHC 3073

² Inquiry Document 11 - Emerging Gayton and Gayton Thorpe Neighbourhood Plan - P20 - "Three Wishes"

procedures. As such, I cannot attribute the plan any more than very limited weight at this stage.

Housing Land Supply

17. The parties agree that based on the formula set out in the housing delivery test, and using a buffer of 5%, the annual housing requirement is 556 dwellings per annum or 2,780 for the 5 year period.
18. In relation to housing supply, the Council consider that they can demonstrate a supply of 8.7 years or 5,069 units, based on the application of a lapse rate of 10%. The appellant disputes the deliverability of a number of sites in the Council's supply and, in addition, considers that a lapse rate of 30% should be imposed.
19. The Appellant's argument for a 30% lapse rate³ is based on a comparison of residential units approved in England 2011-2016 with housing completions over the same period. The calculation shows that, based on the 2 sets of figures supplied, and averaged over that period, at a national level, 30% of residential units approved during that period were not built out.
20. The calculation uses 2 separate sources, the Home Builders Federation (HBF) and the Ministry of Housing, Communities and Local Government (MHCLG), and I have been provided with no information as to how these figures were derived. I also note that the figures do not cover 2017 or 2018. Furthermore, the figures are nationally based, and I have been provided with no evidence at all that lapse rates in the Borough of King's Lynn and West Norfolk have historically been, or continue to be, in or around 30%. At the Inquiry the appellant argued that the lapse rate could also appropriately be set at a level between the 10% the Council uses and the 30% the appellant advocates. However, I was provided with no substantive or persuasive evidence as to what an alternative lapse rate should be.
21. I therefore have no firm basis for coming to the view that the lapse rate should be greater than the 10% adopted by the Council. It is used in addition to the 5% buffer laid out in national policy. As such it is a prudent precaution, but I see no compelling reason why it should be set higher at this time.
22. Much time was spent at the Inquiry reviewing the likely supply from disputed sites. However, even if I were to accept that some of those sites were to fall away, or deliver at a slower rate than anticipated, with a 10% lapse rate the appellant does not dispute that the Council can demonstrate a 5 year supply of housing land. Indeed, the parties agree that even if I were to adopt the approach used in the "Woolpit" Appeal⁴ and every one of the disputed sites were removed from the supply, on the basis of a 10% lapse rate the supply would stand at 3,058, in excess of the requirement of 2,780. Therefore, as I find no reasonable basis for a higher lapse rate in this case, I am satisfied that the Council can demonstrate a 5 year supply of housing land.

³ David Churchill proof appendix 2

⁴ APP14 - APP/W3520/W/18/3194926

Conclusion on Location of Development

23. The Framework is clear that in order to significantly boost the supply of housing, it is important that there is a sufficient amount and variety of land allocated for housing. It also states that a failure to do so would render the most important policies for determining the appeal out of date. However, where the Authority can demonstrate that a 5 year supply exists, as is the case in this appeal, the proposal should be determined in accordance with the development plan, unless material considerations indicate otherwise.
24. I acknowledge that the proposal would, in effect, form an extension to the Key Rural Service Centre, and so would have reasonable access to services and facilities. Nevertheless, there is no dispute between the parties that the proposal would be contrary to Policies CS06 of the CS and DM 2 of the SAMDP. This conflict therefore weighs against the proposal in the planning balance.

Effect on heritage assets and upon the character and appearance of the area

Introduction

25. The appeal site comprises an open field, which at the time of the site visit was lying fallow. It is enclosed to the north and south by housing and to the west is adjoined by an agricultural field. Public footpaths run from north to south on the eastern and western edges of the site and so, despite being enclosed from the Lynn Road and Back Street which form the main routes through the village, the site is visible in open views from the footpaths and also from the churchyard of the Grade I Listed Church of St Nicholas, which immediately adjoins the site to the east.

Effect on the Church of St Nicholas

26. The Planning (Listed Buildings and Conservation Areas) Act 1990 places a statutory duty on decision makers to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest when considering whether to grant planning permission for development which affects the setting of a listed building. This duty is reflected in The Framework which subsequently goes on to categorise any harm to the significance of a heritage asset as either '*substantial harm to or total loss of significance of an asset*' or '*less than substantial harm to the significance of an asset*'.
27. St Nicholas Church sits within a grassed churchyard at the historic core of the village. It is mostly of 14th Century construction and is built in a Transitional style with substantial later additions. The imposing bell tower, which was built in 4 stages, is visible in long range views into the site and marks the church as historically the most important building, lying in the centre of the village. The significance of the asset is therefore derived in part from its historic and architectural interest.
28. The significance of the asset is also derived in part from its setting, the varied nature of which is indicative of the evolution of the village. The immediate setting of the church is provided by the open churchyard which surrounds the building and which enhances views of the church from outside the yard. To the north and east lies Lynn Road and the historic core of the village, where due to the proximity of buildings in the historic core, the relationship of the church building with the older settlement is most evident. To the south and west lie

newer residential buildings and the corridor of open fields which lies at the centre of the village. This pattern of development, with dwellings along Lynn Road and Back Lane, has evolved as residential development has expanded along the roads in recent years. Nevertheless, due to the retention of a continuous core of open fields, right up to the churchyard wall, the church retains an open setting.

29. At the Inquiry the Council stated⁵ that the fields contributed to the significance of the asset in that they reinforced the importance of the asset as a rural church with links in the local agricultural economy. Whilst this could be argued in an abstract sense, I consider the importance of the setting to be more straightforward than that. The remnant of open space which includes the appeal site provides an indication of the original agricultural setting to the west which the Church would have historically enjoyed, but of more immediate note is that its openness affords fine close and some long-range views of the asset and its churchyard across the undeveloped fields. In these views the form of the building and its immediate churchyard setting can be fully appreciated.
30. I take account of the appellant's view, that the vista from the west is only one view of the asset, and arguably not the most striking one. I also note that views of the asset across open land are also afforded in some views from the north. However, this does not negate the contribution the appeal site makes to the setting, as views of the western face of the building are not readily available from other aspects. I therefore conclude that the appeal site makes an important contribution to the setting of St Nicholas Church.
31. The appellant argues that the impact of the proposal on the setting of the asset could be entirely mitigated by the provision of a landscaped buffer within open space to be provided to the east of the appeal site. This is shown on the indicative plans, submitted as part of the appeal, and could be secured by planning condition. The landscaping could, over time, be capable of screening the proposed housing in views from the asset. It would not, however, mitigate the effect of the development on more distant views of the asset from the west, across the appeal site.
32. I am conscious that these views currently encompass the existing modern housing to the north and south, and that from some aspects, particularly along the western public footpath, existing trees and hedging obscure views of the asset in places. Nevertheless, the development would reduce the openness provided by the existing site and urbanise some available views. The mitigation measures and landscaping would reduce the harm but not remove it. The proposal would therefore have a negative effect on the setting and, with it, the significance of the asset. As this would have only a moderate effect on one aspect of the asset's significance, I conclude that the harm to significance of the setting of the heritage asset would be 'less than substantial'.
33. In coming to a view I have had regard to the evidence put to me by the heritage witnesses at the Inquiry, and the views of Historic England⁶ as Statutory Consultee. I note that the site was considered for development during the "Issues and Options" stage of the SADMP in 2011. This assessment states that development of the site would not impact upon the intrinsic character of the area, and that the impact on the setting of the Listed church

⁵ Ms Masons EIC

⁶ APP2 – Views of Historic England on 16/00647/OM

could be mitigated. This was also the view of the Council's Conservation Officer⁷ during the planning application.

34. However, I also note that when site GAY1 was considered in the Preferred Options Document in 2013, which did not represent the full extent of the site before me, English Heritage raised concerns in relation to the setting of the Church and the site was deleted from the SADMP. It is therefore clear to me that, notwithstanding the accessibility of the site to local services, its omission from the plan was not solely due to the matter of access and was informed by views arising from public consultation. Accordingly, this diminishes the weight I attribute to the site's inclusion as an option for development early in the plan process. Furthermore, whilst I have had regard to the views expressed by all, including the Inspector at the previous Inquiry⁸ I am not bound by them and for the reasons expressed above, have reached a different view.
35. I have set out above my preliminary findings upon the effect of the proposal on designated heritage assets. I shall carry out the balancing exercise required by paragraph 196 of The Framework within my overall conclusions.

Impact on the character and appearance of the area

36. In views from the footpath to the west, from adjoining properties and from the churchyard and footpath to the east, the site forms part of an open and undeveloped gap at the heart of the village which contributes to its rural character. Development in this context would significantly intensify the pattern of built form and this urbanising effect would be immediately apparent to adjoining occupiers and to residents using the public footpaths to the east and west of the site. In views into the site, the loss of openness and consequent intensification of built form would erode the remaining rural character of this part of the village and sever the connection with the agricultural land to the west, thereby reducing local distinctiveness.
37. The development would not be prominent in views from either Back Street or Lynn Road and consequently the proposal would, at most, have very limited impact on wider views or upon the character of the wider landscape. I have therefore considered whether these effects would be significantly harmful. Although the site is not prominently visible in the wider landscape, its position at the heart of the village nonetheless has a substantial influence upon the character of the settlement. The pattern of development in Gayton appears to have arisen by chance, due to the linear nature of development over time along the main routes through the village. I note that recent backland development has taken place at Hall Farm and that land to the south-west of the site⁹ has outline planning permission. Nevertheless, the openness that remains is nonetheless an attribute which contributes positively to the rural character of Gayton and so I must conclude that its loss would lead to harm in that regard.
38. At the Inquiry it was put to me that if permission was refused the appellant would be compelled to enclose the site with a 2m high fence, in the interests of public safety. It was argued that this enclosure would represent a fallback position against which the effects of the proposal should be assessed. I find

⁷ APP4 – Comments of Pam Lynn

⁸ Appeal Decision dated 20 December 2017 – now quashed Appellant's supporting document 3

⁹ 15/01888/OM found at HM20

limited evidence to support the claim that there is a need for this. The site does not appear to be subject to anti-social behaviour and I note that public footpaths adjacent to the site appear to be well used with no evidence of harm occurring to users, or any detrimental effect on adjoining land.

39. Nevertheless, even if I were to accept that a fence was to be erected, in long range views across the site from the west it would be significantly less intrusive than the proposed housing which I was advised would be mostly 2 storeys in height and so substantially taller than a 2m fence. This diminishes any weight I attribute to the matter as a fallback.
40. For the reasons set out above, informed by my own observations on site, I consider that the proposal would give rise to harm in relation to its effect on a heritage asset and, to a lesser extent, the character and appearance of the area.

Other Matters

41. It was put to me at the Inquiry by the appellant that, following development at Hall Farm, the site was no longer capable of agricultural use and that this was a matter which weighs in favour of the proposal. The site is Grade 3 agricultural land, is currently fallow and appears to have been so for some time. The site has no straightforward access for farm machinery, although I note that access could potentially be achieved from the adjoining fields, across the public footpaths to the west and east of the site. Furthermore, based on the information put to me, I am not assured that the site could not serve a use which would preserve its open and undeveloped character. I note that at least one adjoining property owner has expressed an interest¹⁰ in using the land for the grazing and stabling of horses. Therefore, whilst I cannot be assured that the owners would release the site if permission was refused, I give little weight to the contention that it could not be put to an alternative use. Furthermore, whilst an equine use would potentially require some small scale built development, this would not have the visual impact of the development proposed. I therefore attribute this matter little weight in favour of the proposal.
42. The submitted Unilateral Undertaking, dated 29 March 2019, makes provision for open space, sustainable urban drainage, a habitat monitoring and mitigation strategy and for affordable housing. The Council are satisfied with the terms of the undertaking and have indicated that the provisions would not exceed the restrictions for the pooling of contributions. These provisions are necessary to make the development acceptable in planning terms and, other than the provision of affordable housing, would not generally weigh in favour of the proposal. The provision of affordable housing at 20% is required under the terms of Policy CS09 of the CS. Nevertheless, I consider it to be a public benefit and along with the provision of market housing I afford this significant weight in the planning balance.
43. I acknowledge that Public Open Space within the site has the potential to provide a facility for members of the public other than residents but, as I cannot be assured of how access to this would be secured, I can attribute no more than limited weight to this as a benefit.

¹⁰ APP 20. Late Representation – Mr Darren Rose

44. The proposal would provide economic benefits during construction and would assist in sustaining existing local services to which I attribute moderate weight. It also has the potential to provide ecological benefits though, on the basis of the submissions made to me, I am not convinced that these would amount to anything other than a limited benefit. I note that repairs to the church wall could be carried out as part of the scheme. Indeed, the appellant stated that this was discussed with the Case Officer. However, as there is no mechanism to secure this, this limits the weight I attribute to it as a planning benefit.
45. Residents have raised concerns relating to the development. Some have objected to the proposal on the grounds of highway safety. I note that the Council's highways officer does not share these concerns and based on the evidence before me, I have no substantive grounds to suggest that the proposal would lead to harm in relation to this matter.
46. I have also been advised that the area is subject to localised flooding. Neither the Environment Agency or the Local Drainage Board has objected to the proposal and I note that the appellant has committed to implementing Sustainable Urban Drainage on site, to mitigate the risk of increasing flood risk off-site. On that basis I am satisfied that the proposal would not lead to harm in this regard. Likewise, I note that the application is supported by an assessment of the ecological value of the site that concludes that the site is of limited value as a habitat and that the effects of the proposal can be mitigated. In the absence of any compelling evidence to the contrary, I am of the view that the proposal would not lead to harm in this respect.
47. Some residents have expressed concerns in relation to the effects of development on their living conditions, particularly in relation to privacy. The application is made in outline form and it would be within the Council's scope to ensure that any potential layout protects the amenity of existing residents. This matter does not therefore weigh against the proposal.
48. Finally, I take into account a number of appeal decisions put to me in evidence¹¹, but I cannot be assured that any are directly comparable to the scheme before me. I do not know the detailed arguments that were advanced in those cases and am conscious that the policy background in locations outside the Borough could be markedly different to the case before me. Accordingly, I give these decisions no weight.

Conclusions

49. I have found that the proposal would result in a diminution in the openness of the setting of St Nicholas Church which would cause less than substantial harm to the significance of the designated heritage asset. Mitigation in the form of landscaping adjacent to the asset would assist to some extent in screening views of the new development from the churchyard. However, it would not ameliorate the harm to longer range views of the asset from the west and would not compensate for the loss of openness around the asset, which is an important element to its setting.
50. Paragraph 196 of The Framework sets out that where a proposal would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal. The proposal

¹¹ APP/G2435/A/14/2228806, APP/W1525/W/15/3121603, APP/D0840/A/13/2209757, APP/W1715/W/18/3194846

would provide both market and affordable housing in a relatively accessible location. I am advised that the site is deliverable and could be brought forward in a short timescale. I am conscious of the impetus in The Framework to boost the supply of housing nationally and, notwithstanding the fact that the Council can demonstrate a healthy 5 year housing supply, the provision of homes is a matter to which I attribute significant weight. The proposal would also provide some economic benefits during construction and would assist in sustaining local services. I afford these benefits some moderate weight. It would also provide some limited ecological benefits, to which I have attached some limited weight.

51. Whilst together these public benefits would be considerable, I also take account of Paragraph 193 of the Framework which indicates that when assessing the impact of a proposal on the significance of a heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater that weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. I therefore conclude that the public benefits of the scheme would not outweigh the harm to the significance of the heritage asset in this case. It follows that the proposal fails to comply with national policy outlined in the Framework. It would also be contrary to Policy CS12 of the CS.
52. To a lesser extent the proposal would also lead to some limited harm to the character of the countryside in this location and would therefore conflict with Policies CS08 and DM 15, of the CS and SADMP respectively. The proposal would also be located outside the adopted settlement limits and so would conflict with CS Policy CS06 and Policy DM 2 of the SADMP, which also aim to protect the intrinsic beauty of the countryside.
53. Section 38(6) of the Planning and Compulsory Purchase Act 2004, as amended, requires that any determination must be made in accordance with the development plan, unless material considerations indicate otherwise. The Framework directs that where a proposal conflicts with an up-to-date development plan, permission should not usually be granted. The proposal would be contrary to Policies CS06, CS08, CS12 of the CS and Policies DM 2 and DM 15 of the SAMDP. Whilst the benefits of the scheme would together carry significant weight, they would not be sufficient to outweigh the harm to the significance of the heritage asset and the other harm I have identified.
54. Accordingly, having regard to all other matters raised, the appeal is dismissed.

Anne Jordan

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Timothy Leader Of Counsel

He called:

Peter Jermany Principal Planner (Policy)
BA(Hons) BTP MRTPI

Helen Morris Principal Planner (Planning Control)
BSc(Hons) DipTP MRTPI

Jenni Mason IHBC Associate Director (Heritage) Turley Associates

As part of round table discussions:

Nikki Patton Borough Council of King's Lynn & West Norfolk

Alex Fradley Borough Council of King's Lynn & West Norfolk

FOR THE APPELLANT:

David Churchill Partner, Carter Jonas

Nick Fairman Director, Newhall Properties
BSc(Hons) MRICS FCIH

Dr Richard Hoggett Heritage Consultant
FSA MCIFA

Jon Etchells Landscape Consultant
MA BPhil CMLI

As part of round table discussions:

Charlie Maier Newhall Properties

INTERESTED PARTIES:

S Renwick Local Resident

P Gidney Local Resident

APPLICATION PLANS:

Location plan – drawing no. 018.SK.02 Rev P2 January 2016.
Indicative Site Layout – drawing no. 018.SK.01 Rev P4 January 2016.
Lynn Road Junction Option - H641-Figure 3 D

PLANS SUBMITTED AS PART OF THE APPEAL:

Plan ref 018.SK.02 Rev P3
Indicative Plan ref 018.SK.01 P4
Indicative Plan ref 018.SK.03 P1

DOCUMENTS SUBMITTED DURING THE COURSE OF THE INQUIRY

- 1 Opening statement on behalf of BCKLWN
- 2 Planning consultation response from Historic England 16/00647/OM
- 3 Extract from planning officer report
- 4 Comments of Pam Lynn – Conservation Officer – 16/00647/OM
- 5 Evidence of title NK262646
- 6 Evidence of title NK449376
- 7 Council's revised housing land supply calculations
- 8 BCKLWN- Updated Housing Trajectory
- 9 Minutes of the Local Development Framework Task Group 2 April 2014
- 10 Agenda for the Local Development Framework Task Group 8 May 2014
- 11 Gayton and Gayton Thorpe Neighbourhood Plan – Working Document
- 12 Scott Schedule – Respective Positions - Housing Allocations
- 13 Extract from the SAMDP – Policy DM22
- 14 Appeal Decision APP/W3520/W/18/3194926 (Woolpit)
- 15 Extract from SAMDP – Neighbourhood Plans
- 16 Proof of Evidence Mid Suffolk District Council – Woolpit appeal
- 17 Telford & Wrekin High Court Judgement (CO/2639/2016)
- 18 Issues & Options Consultation September 2011 – Gayton, Grimston & Pott Row
- 19 Extract from the SAMDP – Policy DM22 (duplicate)
- 20 Late Representation – Mr Darren Rose
- 21 Unilateral Undertaking dated 29 March 2019

- 22 Closing Statement on behalf of BCKLWM
- 23 Closing submission on behalf of the appellant

Richborough Estates