



Appeal Decision

Inquiry held on 19-21 May 2015

Site visit made on 22 May 2015

by **Terry G Phillimore MA MCD MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 9 July 2015

Appeal Ref: APP/J3530/A/14/2221769

Land adjacent Sports Ground, North Entrance, Saxmundham IP17 1AT

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a failure to give notice within the prescribed period of a decision on an application for outline planning permission.
 - The appeal is made by Christchurch Property Company Limited against Suffolk Coastal District Council.
 - The application, Ref DC/13/2961/OUT, is dated 1 October 2013.
 - The development proposed is up to 15 dwellings.
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Decision

1. The appeal is dismissed and planning permission is refused.

Procedural Matters

2. The appeal relates to an outline application with all matters reserved other than means of access.
3. The Council on 20 August 2014 agreed deemed reasons for refusal of the application following submission of the non-determination appeal.
4. The appeal was originally proceeding by way of written representations but this was subsequently changed by the Planning Inspectorate to a public inquiry.
5. The appellant made a unilateral undertaking dated 26 August 2014 containing planning obligations pursuant to section 106 of the Act. At the inquiry a deed of variation to this undertaking dated 21 May 2015 was submitted. The obligations are capable of meeting the requirements of the Council and Suffolk County Council with respect to affordable housing and infrastructure matters, including having regard to the Community Infrastructure Levy Regulations 2010.

Main Issues

6. The main issues are:
 - a) the implications of the housing land supply position in the District including with respect to the weight to be given to the shortfall and the application of the relevant Development Plan policies;

- b) the effect the proposal would have on the significance of the non-designated heritage asset of Carlton Park Historic Parkland, the setting of the Grade II* listed Church of St Peter and the landscape character of the area;
- c) whether the proposal would overall amount to a sustainable development.

Reasons

Housing land supply

7. Policy SP29 of the Suffolk Coastal District Local Plan Core Strategy & Development Management Policies 2013 deals with The Countryside. This applies to all land outside the physical limits of defined settlements including Towns, one of which is Saxmundham. New development in the countryside will be limited to that which of necessity is required to be located there in accordance with other policies or special circumstances. Policy DM3 deals with Housing in the Countryside. It directs new housing firstly and primarily to, and integrated within, the settlements for which physical limits boundaries have been defined, with only limited categories of new housing in the countryside to be allowed.
8. The 1.32ha site is at the north end of Saxmundham. The boundary of the town at this point is defined by the Proposals Map from the Suffolk Coastal Local Plan Adopted 1994 (incorporating First and Second Alterations). The boundary is some 15m to the south of the site. The site is therefore outside the defined limits of Saxmundham, and the proposal does not comprise one of the acceptable categories of development in the countryside. The proposal for residential development is therefore contrary to these policies, and is not in accordance with the development plan because of the fundamental nature of this policy conflict. A finding in favour of the proposal is thus dependent on other material considerations to override the development plan. There is no dispute on this matter.
9. The National Planning Policy Framework sets out a presumption in favour of sustainable development. Paragraph 14 indicates that, for decision-taking, this means, where the development plan is absent, silent or relevant policies are out-of-date, granting permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate development should be restricted.
10. The Framework sets out an aim in paragraph 47 to boost significantly the supply of housing. According to the Framework, relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. Policy SP29 is such a policy given its potential broad effect of restraining housing development.¹
11. The Framework requires that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area,

¹ This accords with the High Court decision in the case of Hopkins Homes Ltd v Secretary of State for Communities and Local Government and Suffolk Coastal District Council [2015] EWHC 132 (Admin), which reached this specific finding with respect to the policy. At the inquiry it was confirmed that the Council has been granted leave to appeal this decision but no date for consideration by the Court of Appeal had been fixed.

as far as is consistent with the policies set out in the Framework. They should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. The Framework indicates that the buffer should be increased to 20% where there has been a record of persistent under delivery of housing.

12. Policy SP2 of the Local Plan 2013 indicates provision for at least 7,900 new homes across the District in the period 2010 to 2027. The policy sets out that an early review of the Core Strategy will be undertaken, commencing with the publication of an Issues and Options Report by 2015 at the latest; the review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with policies in the Framework. Despite this commitment in the policy, and that the figure of 7,900 is prefaced by "at least", it is agreed by both main parties that this figure is the correct one against which to assess the current 5 year position. This approach accords with the advice of the Planning Practice Guidance (PPG) in terms of the weight to be given to the housing requirement figure in an adopted Local Plan.
13. The Council's most recent completed monitoring exercise relates to the period up to 31 March 2015. The Council claims a supply of 4.3 years, while the appellant has a lower figure of 3.2 years. It is therefore common ground that the Council cannot demonstrate a 5 year supply, and that paragraph 14 of the Framework is engaged as a consequence of the Council's housing land supply policies being out-of-date.
14. The appellant argues that the difference between these two figures is immaterial, on the basis that in either case the contribution that would be made by the proposal to housing supply (including affordable housing) is one that should carry significant weight. Reference was made to an immediately preceding public inquiry on another appeal case in which that supposition was accepted by a witness for the Council.² However, I deal with the difference in order to take account of the extent of the shortfall as a material consideration.
15. The disparity between the parties arises from, firstly, the percentage buffer to be applied and, secondly, the treatment of previous shortfall in delivery.
16. There has been under delivery against the annualised delivery target of the Local Plan (465 dwellings per year from 2010) and before that the Suffolk Structure Plan (510 dwellings per year) since 2009, with the delivery that year (2009-10) at 256 dwellings also falling short of the later lower target. There have therefore been 6 consecutive years in which delivery has fallen short, with 5 of those by a considerable margin, although the most recent year at 427 completions has been closer to the target. The Council argues that the period of low delivery coincided with economic recession, pointing out that the completions for previous years were considerably in excess of the Structure Plan target. It is also relied on that the Local Plan Inspector did not require a 20% buffer. However, it appears that he had data extending only up to 2011, therefore showing a 2 year shortfall. While the Council expects an outturn of 481 dwellings in the coming year and therefore to be above target, that is a prediction rather than relating to an actual record.

² Appeal ref APP/J3530/W/14/2225141

17. Assessing the local delivery record is advised by the PPG to be a matter of judgment. That permissions have been granted or agreed by the Council at a level considerably in excess of completions does not equate to a record of delivery, with the purpose of the buffer being to enable choice and competition. While the effect of the recession would have been a factor in delivery, taking a reasonable long term view based on the evidence indicates that the District is currently one to which a 20% buffer should apply.
18. With respect to how the shortfall should be dealt with, the Council suggests that this should be spread over the whole plan period rather than just the next 5 years. However, advice in the PPG is clear that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be done in the first 5 years, they will need to work with neighbouring authorities under the 'Duty to Cooperate'. There is no evidence of there being such cooperation that is likely to assist in dealing with the District's shortfall. The constrained nature of the District claimed by the Council also does not warrant delay in addressing the undersupply, since the restrictions imposed by its environmental qualities would have been considered in the setting of the Local Plan target, and individual proposals still fall to be assessed against the objectives of sustainable development.
19. On both of the factors leading to the difference in the 5 year position I therefore find in favour of the appellant's arguments, indicating that a figure of 3.2 years is more reliable.
20. The Council has put forward a further assessment of the housing land supply position with a base date of 1 April 2016. This calculates a supply of 5.37 years. Based on this the Council asserts that there is a prospect of the shortfall being made up in the near future. I give relatively little weight to this analysis. It relies on a projected figure of completions up to that date. Discussions are apparently continuing with developers on likely delivery on individual sites, such that the estimates currently put forward remain to be confirmed. With a base date so far ahead the assessment in effect involves the identification of a 6 year supply, and is therefore inevitably to be regarded as less reliable than one identified for a 5 year period. The assessment also uses the same approach with respect to the buffer and shortfall as the current assessment, thus over-estimating the supply for the reasons set out above. Finally, the commitment in the Local Plan to a future review that identifies the full, objectively assessed housing needs for the District will also become increasingly relevant as time passes. The Council's further assessment therefore does not indicate an imminent prospect of the current shortfall being made up such as to materially reduce the weight carried by this.
21. The housing land supply shortfall therefore carries significant weight, with this factor indicating strongly against a strict application of policy SP29, which is out-of-date.

Heritage assets and landscape

22. The site is located in an area of designated historic parkland which lies to the north of Saxmundham. Carlton Park Historic Parkland is a local designation established through the Council's Historic Parks and Gardens Supplementary Planning Guidance (SPG) of 1995. The designated area extends to some 66ha, mostly on the west side but also partly to the east of North Entrance, which is

the old A12 route leading northwards out of the town. Carlton Park is not a Registered Park and Garden on English Heritage's National Heritage List for England, but is agreed to be a non-designated heritage asset in the terms of the Framework. According to its paragraph 135, the effect on the significance of such an asset should be taken into account in determining an application, with a balanced judgment required having regard to the scale of any harm or loss and the significance of the heritage asset.

23. Policy AP4 of the Local Plan 1994 indicates that the preservation and/or enhancement of parks and gardens of historic and landscape interest and their surroundings will be encouraged. Permission will not be granted for any proposed development if it would have a materially adverse impact on their character, features or immediate setting. This policy does not reflect the balancing approach of the Framework, but I carry out this balance under the final issue. Policy SP15 of the Local Plan 2013 seeks to protect and enhance the various landscape character areas within the District. Designated Parks and Gardens of Historic or Landscape Interest, among other areas, are considered to be particularly significant.
24. In general terms, the SPG identifies historic parks and gardens as an important part of the heritage of the District. It states that as well as their significant contribution to the landscape of a locality, they reveal facets of the cultural and social history of an area. The majority have developed as a series of additions or alterations to earlier layouts, which do not necessarily diminish the interest of a site. Parklands are identified on the basis of meeting a number of a series of criteria. Parkland boundaries are drawn to include the area currently forming the visual extent of parkland and any additional area which historically formed part of it and which continues to display remnants of that former park. The boundaries do not take account of present land ownerships. The SPG also states that every parkland is unique but there are a number of common features. Free standing parkland trees are cited as an important semi-natural one, and noted parkland buildings include gatehouses and lodges.
25. The Carlton Hall Estate existed by the late 17th century, probably as a landholding based on Carlton Manor. Centrally located within the parkland is the parish Church of St Peter. This is a Grade II* listed building which is of medieval origin and likely to have had a relationship with the manor. It is a relatively small building with a compact tower, and has the appearance of a chapel. The former Carlton Hall is dated to the late 18th century, with a location to the north of the Church and an orientation facing towards it. The park was created around and primarily for the Hall, taking in the Church within the estate.
26. Late 18th century planting of the park comprised oak, ash, sycamore, lime, horse chestnut and elm. By the 19th century the park was crossed by a number of highways, approaches, drives and footpaths. Lengthy routes passed through the ornamental landscape. The main formal entrance appears to have been from the south-east corner beside an entrance lodge.
27. Substantial changes to the park took place during the 20th century. Carlton Hall was requisitioned for army use during World War II, with diversion of the main approach and the lodge demolished by 1971. The Hall itself was largely destroyed by fire and later rebuilt as a modern building containing apartments, although on essentially the same site and with architectural references to the

- previous building. During the War a group of Nissen huts were erected fronting the road to the east of the Hall, and these subsequently formed the origin of what is now an industrial estate. That area is excluded from the park designation, as is other modern development lying to the north.
28. In 1945 almost the entire remaining park area contained trees and grass, but over the next 25 years the majority of the trees were felled and a diagonal boundary was created across the park. On the north-east side of this line agricultural uses were inserted, with the Church becoming isolated in an agricultural field. On the south-east side recreational uses became established, with sports pitches, some associated buildings and an open area laid out as a caravan site. The area to the east of North Entrance is also now in agricultural use.
29. The Council's inquiry evidence refers to the location of the park on an old section of the A12. It asserts that the estate had a role in the formalisation of the road between Ipswich and Great Yarmouth with the establishment of the Turnpike Trust in 1785. Citing a chain of similar sized estates strung out beside the A12 which grew and prospered as commercial trading wealth spread along this route, the Council claims that this linear grouping of historic parklands is a defining characteristic of the east Suffolk area. However, no sources are identified in support of the proposition of a link with the Turnpike Trust. Whilst the map evidence shows some linear association of parks with the A12 route, parklands generally have a wide distribution, and a functional relationship between the Carlton parkland and the road has not been established.
30. Drawing on the above, the main significance of the non-designated heritage asset of Carlton Park derives from the historic interest of its origin as a created estate parkland. Within this, the Church has particular architectural and historic value, and is of national importance. Although the Church is now set in immediate surroundings that are agricultural and the original Hall has been rebuilt, with the siting and retained appearance of the latter there is a continuing legible relationship between these buildings at the heart of the park. This is of historic and artistic significance. Although the visual envelope of the buildings is relatively limited due to the lower ground in that part of the park, this significance is enhanced by the continuing presence of extensive open land around them which provides a perception of the historic spacious surroundings.
31. The industrial estate and residential encroachment on the north park edge have erased all parkland elements and character in those parts, but they are not included in the boundary of the listing. The designated open areas have undergone much change with tree removal and the introduction of agricultural and recreational uses. However, this occurred prior to the parkland designation, and they do nevertheless remain essentially undeveloped. The recreational areas also retain an open feel that is evocative of parkland character and, although relatively few, the remaining individual parkland-type trees and remnants of the main entrance route contribute some sense of the artistic designed landscape qualities. The degree to which the present extent of open land reflects the original scale of the park, including the link with a swathe of land across the road, adds to the historic value associated with the estate's creation. In these respects the landscape is capable of revealing key aspects of the cultural and social history of the area.

32. Factors that detract from the significance of the asset are therefore the loss of the original Hall, erosion of the park at its edges, degradation of the parkland landscaping and the introduction of new uses. However, having regard to the continuing presence of the Church and rebuilt Hall and the spatial relationship between these at the park's centre, the large physical extent of undeveloped land across much of the original estate, the presence of some remnant parkland features, and the general importance given to parklands in the District's heritage, overall a moderate degree of significance can be accorded to the asset.
33. The rectangular appeal site abuts North Entrance with its long side against the road. To the south are Tollgate Cottage adjacent to the road and some other residential properties set back from this. To the north are the entrance drive to the sports club and caravan park and some sports facilities, with the caravan site and sports pitches beyond to the west. The site was at one time apparently used for commercial coniferous planting. The statement of common ground records that until recently it was kept as overgrown disused grassland with developing scrub and a few scattered trees. Two of these at the north end are limes covered by a TPO. In early April 2015 all of the undergrowth was cleared back to bare soil, with the two lime trees untouched. The line of part of the original estate access track is visible across the west edge of the site. There is a row of concrete posts to the road boundary.
34. In 2004 the Council granted planning permission for the erection of a one-stop health/social service facility with separate ambulance station and birthing centre on the site (reference CO3/2347). It is agreed that construction of the access amounted to implementation of the scheme such that the permission is extant. However, there is no prospect of its further development, and the appellant does not rely on this as a fallback position. Similarly, there is no evidence of likelihood of the development of other social facility type uses on the site as advocated in preference to the present scheme in some third party representations, and I give minimal weight to the objections made on this basis.
35. The currently undeveloped nature of the site is consistent with the parkland's significance identified above. The protected lime trees are not early planting, but at the inquiry were agreed to be of the order of 130-150 years old. As mature specimens of a parkland type they are in keeping with the estate character. The line of the track across the site is a remnant of the original layout. The site provides a large extent of the prominent road frontage of the designated parkland on the west side of North Entrance. Although visibility into the east side is restricted by vegetation, and this side is in agricultural use, the swathe of open land across both sides of the road is also a surviving element of the historic layout.
36. The Council contends that paragraph 130 of the Framework is relevant. This advises that where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state should not be taken into account in any decision. Although the site has recently been largely cleared, and it has a somewhat bare appearance, the present condition does not amount to evidence of such purposeful degradation. Conversely, it seems to me that an improvement in the appearance of the site consistent with parkland landscape would be relatively straightforward, and there is no compelling evidence to suggest that this is not feasible by way of sensitive maintenance as encouraged

- by the SPG. I therefore give little weight in either direction to the present condition of the site.
37. I have no doubt that, having regard to the significance of the parkland and the features of the site identified above, the site is properly included within the designated area and makes an important contribution to that significance. It provides a visible presence of parkland landscape and is a valuable part of the remaining integrity of the designated area.
38. In illustration of the proposed residential development on the site, two versions of an indicative site layout were submitted prior to the Council's decision, with a further alternative forming part of the appeal evidence. Each shows the intended retention of the lime trees, and there is agreement that this is technically possible with the illustrated footprints of development. In the latter two versions the trees are shown as being outside private garden areas. While the Council remains concerned about the potential implications of the siting of the buildings and car parking areas in relation to the trees, it is likely given their amenity value that applications for removal or substantial lopping could reasonably be resisted on the basis of the most recent layout.
39. However, each of the illustrative layouts shows a distribution of buildings across a large part of the site, amounting to at least some two thirds of the road frontage width even in the final version. As well as a series of individual buildings, as indicated there would be hardsurfaced vehicular access, parking areas, plot sub-division and boundary features. All of this would create a distinct character of domestic residential development. The buildings are shown to be set well back from the road frontage, and the northern part of the site is also indicated in the most recent layout as part of a continuous area of open space. The appellant suggests that new landscaping within this space could have a parkland type character. However, the immediate visual context of this planting would be the new buildings, as would be that of the retained trees. The effect would be of a landscaped edge to a suburban-type residential development rather than one that is consistent with and an enhancement of parkland character. Despite the set back of buildings and retained open width, the development would also to a large degree sever the parkland from its road edge and break the continuity of this across North Entrance. Although the former lodge no longer exists, the line of the original access way where it crosses the site would also be fully obscured by development.
40. While the new buildings would provide screening to the caravans on the site which are currently visible from the road when present, these buildings themselves would lead to a much greater erosion of parkland appearance. The suggested use of new planting to screen the buildings in views from the road would also negate the important open character of the parkland. The appellant argues that the proposal would affect only some 2% of the parkland area. However, that is not a reliable measure of the impact of the scheme on the parkland, given that other than the Hall this contains no residential development and having regard to the particular location and attributes of the site and the nature of the development indicated. Notwithstanding that the site is largely visually separated from the Church and Hall, the result of the proposal would be that the historic interest of the park would become less recognisable. This outcome would amount to an important loss of significance of the asset as a whole.

41. In these respects the proposal does not accord with policies AP4 and SP15.
42. The statement of common ground records that: "It is agreed that the proposed development would not significantly harm the setting of the Church of St Peter". At the inquiry both main parties indicated their view that the degree of harm would fall below the threshold of "less than substantial" referred to in the Framework, and therefore that the requirement relating to such harm to the significance of a designated heritage asset set out in its paragraph 134 does not apply. It was pointed out that a written representation from English Heritage referred to the site area incorrectly, and the suggestion was made that this may have been prepared without the benefit of a site visit.
43. Nevertheless, I consider that the English Heritage letter fairly records the origin, history and features of the Church, and agree with it that the Church's presence in the Hall's relic parkland landscape makes a positive contribution to the listed building's significance by way of setting. There is a spatial and historic relationship between the Church and this setting. Having regard to my above findings on the effect of the proposal, I consider that this would harmfully intrude on the setting and have a negative effect on the ability to appreciate the asset, despite the absence of visual connectivity. This harm would be less than substantial but would nevertheless be material. It is sufficient to carry the importance arising from the duty under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as giving rise to the balancing requirement of the Framework.
44. Policy SP15 sets out that sites, gaps, gardens and spaces that make an important contribution to a particular location in their undeveloped form will be identified and protected where known; or more generally avoided where development in these locations would lead to coalescence. Policy AP28 of the Local Plan 1994 deals with Areas to be Protected from Development. Under this, development will not normally be permitted where it would materially detract from the character and appearance of (i) areas identified as to be protected from development or further development and (ii) other sites, gaps, gardens and spaces which make an important contribution in their undeveloped form to a town or village, its setting, character or the surrounding landscape or townscape. Although not specifically identified in the policies, or forming part of a designated Special Landscape Area, the site has such landscape importance in its undeveloped form to this part of the historic parkland as identified above.
45. In addition, lying beyond the edge of the main built up part of Saxmundham and the visible break at the edge of this of Tollgate Cottage, the site is part of a relatively short undeveloped gap between the town and the village of Kelsale which lies to the north. While the proposal would not in itself close the gap, it would result in its substantial erosion, and far more so than the presence of caravans. Although the open land of the bowling green forming part of the sports club and land to the north of this would remain, overall there would be a much less clear visual division between the settlements with the development as proposed. The result would be a materially increased degree of coalescence, contrary to the policies.

Sustainability and overall balance

46. Saxmundham is identified as a town in the settlement hierarchy for the District in the Local Plan 2013, and as such is one of its larger centres. The strategy in

policy SP25 on Saxmundham includes enabling appropriate new development in the form of new housing provision, with priority being given to affordable housing to meet local needs and in support of new employment opportunities. The supporting reasoning for the policy includes a recognition that future development will include new greenfield allocations. The proposal is consistent with this approach. The site itself is a relatively short distance from the town centre and station, which can be reached by walking or cycling. In these respects it represents a sustainable location.

47. In terms of the economic dimension of sustainable development, the proposal would contribute economic benefits during the construction of the dwellings and subsequent to their occupation. New housing is a social benefit, including specifically the affordable element.
48. As set out above, the provision of new housing in the absence of a 5 year housing land supply carries significant weight, and is a strong indication against resisting the proposal on the basis of policy SP29 which is out-of-date. However, this site is distinguished by its status as part of an historic parkland which is a non-designated heritage asset. This asset has moderate significance, which would be harmed in an important permanent way by the proposal having regard to the indicated nature of the development. The site is a greenfield one which has particular historic and landscape qualities. The Framework attributes importance to heritage assets and valued landscapes, with the protection and enhancement of these being aspects of the environmental dimension of sustainable development. In taking a balanced approach to the harm in this case, the housing benefit is a substantial factor, but the scale of the harm is in my judgment not warranted by the gain of 15 dwellings on the site. The harm significantly and demonstrably outweighs the benefits of the new housing when assessed against the policies in the Framework taken as a whole, and the proposal does not represent sustainable development.
49. Noting the views of the parties with respect to the impact on the significance of the Church of St Peter, I record that I reach this conclusion even without taking into account the harm to this designated heritage asset as I have identified it. Adding the statutory and policy requirements relating to consideration of such harm reinforces my conclusion against the proposal.
50. Overall the circumstances do not warrant a decision other than in accordance with the development plan.

Conclusion

51. For the reasons given above I conclude that the appeal should be dismissed.

T G Phillimore

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Jonathan Clay of Counsel	Instructed by Ian de Prez, Solicitor to Suffolk Coastal District Council
He called:	
Mark Edgerley BSc(Hons) PgCert MA MRTPI	Principal Planner (Policy and Delivery), Suffolk Coastal District Council
Nicholas Newton BA(Hons) MA CMLI	Arboriculture and Landscape Manager, Suffolk Coastal District Council
Patsy Dobson BA(Hons)	Development Management Team Leader (Central Area), Suffolk Coastal District Council
Neil McManus BSc MRICS	Suffolk County Council (attended planning obligations session)

FOR THE APPELLANT:

Ian Ponter of Counsel	Instructed by Richard Brown
He called:	
Christopher May BA(Hons) MRTPI	Director, Pegasus Planning Group Limited
Jonathan Edis BA MA PhD MCifA IHBC	Director, Heritage Collective
Brian Denney BA(Hons) DIPLA CMLI CENV MIEMA	Landscape and Environmental Planning Director, Pegasus Planning Group Limited
Richard Brown MSc	Director, Richard Brown Planning Limited

INTERESTED PERSONS:

Stephen Palmer Sir Peter Batho	Local resident Saxmundham Sports and Recreational Club
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DOCUMENTS SUBMITTED AT THE INQUIRY

- 1 Appellant's opening submissions
- 2 Council's opening submissions
- 3 Mr May's response to Mr Edgerley's evidence and attached appeal decision ref APP/H2835/A/14/2220599
- 4 Dr Edis's document on Distribution of Parks and Gardens
- 5 Bundle of representations and petition
- 6 Mr Palmer's annotated plan
- 7 Mr Newton's BBC news report re: collapsed tree
- 8 Letter on behalf of Action Sax dated 19 May 2015
- 9 Deed of variation dated 21 May 2015
- 10 Permission for Court of Appeal hearing of Hopkins Homes Limited v SSCLG & ANR issued 20 May 2015

- 11 Further bundle of representations
- 12 Council's closing submissions
- 13 Appellant's closing submissions

Richborough Estates