The Planning Inspectorate

Appeal Decision

Inquiry held on 7th–10th and 14th–16th February 2023

Site visit made on 14th February 2023

by Anne Jordan BA (Hons) MRTPI

an Inspector appointed by the Secretary of State

Decision date: 31 March 2023

Appeal Ref: APP/W3520/W/22/3308189
Land North of Barking Road, Needham Market, IP6 8EZ, 608583, 254275

- 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 Mr David Willis, Mrs Marlene Perry and Mr Michael Watson against the decision of Mid Suffolk District Council.
- The application Ref DC/21/06882, dated 21 December 2021, was refused by notice dated 6 April 2022.
- The development proposed is outline planning application for the erection of up to 279 no. dwellings (both private & affordable) with associated access, onsite parking provision and open space.

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Decision

1. The appeal is dismissed.

Applications for costs

2. An application for costs was made on behalf of the appellant. This is the subject of a separate decision.

Preliminary Matters

3. The application is made in outline form with details of access for approval. All other matters are reserved. The application is accompanied by a masterplan showing a layout for the site which the submitted Design and Access Statement refers to as indicative[1].

4. The Inquiry sat between the 7th–10th and 14th–16th February 2023. Due to illness one of the appellant's witnesses was unable to give evidence and instead their written submission was relied upon. After the event, in the interests of fairness, I allowed the parties the opportunity to make further submissions if necessary. The Inquiry was thereafter closed on the 28th of March 2023.

5. At the time of the appeal the Babergh and Mid Suffolk Joint Local Plan JLP was at examination. Although the parties do not agree as to the current status of the examination, neither party considers the policies within the emerging plan to be determinative for this appeal. No policies from the emerging plan have been referred to in the Council's reasons for refusal and I note that the plan will, in any case, be some way off adoption. I have therefore not given the emerging plan any significant weight in this appeal.

[1] Design and Access Statement para 2.2

6. The application is accompanied by a legal agreement which makes provision for 100 affordable housing units, land for early years education provision and a financial contribution also to this end, a contribution towards secondary school transport, a contribution to cover the cost of implementing a traffic regulation order, a cycling improvement contribution, a contribution towards rights of way improvements and a contribution to cover the cost of monitoring the travel plan.

7. The ninth reason for refusal relates to the provision of land for early years education provision. The tenth reason relates to provision for securing the necessary infrastructure to serve the proposed development. The Council confirmed at the Inquiry that subject to the provision of the legal agreement to secure these matters, they were no longer defending the ninth and tenth reason for refusal.

8. During the Inquiry I heard from a number of local residents. Their evidence was in some cases accompanied by supporting submissions which expanded upon their original responses at the time of the application. These have been accepted as Inquiry documents and are listed as such in the Schedule appended to this decision.

9. The appellant does not dispute that the Council can demonstrate a 10.88-year housing land supply.

Main Issues

10. Accordingly, the main issues for the appeal are:

- Whether the proposal is in an appropriate location having regard to the impacts of flood risk and whether future occupiers would be safe from the impacts of flooding,
- Whether the proposal would have an acceptable impact on highway safety,
- Whether occupants of the proposed development would have reasonable access to local employment, shops and services and whether the proposal makes appropriate provision for travel by sustainable transport modes,
- Whether future residents would enjoy acceptable levels of residential amenity, having regard to the proximity of Needham Market Football Club,
- The effects of the proposal on landscape character and the appearance of the surrounding area.

Reasons

Planning Policy Background

11. The Mid Suffolk Local Plan (LP) was adopted in 1998. The development plan also comprises the Core Strategy (CS) which was adopted in 2008 and reviewed in 2012, the Suffolk Minerals and Waste Local Plan (MP) 2020, and the Needham Market Neighbourhood Plan (NP) which was adopted in 2021. Throughout the Inquiry the Council referred to a number of policies from these documents, some of which were not referred to in the reasons for refusal. I have referred below to those policies which I consider are most pertinent to the scheme before me.

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12. Policy H7 of the LP states that in the interests of protecting the existing character and appearance of the countryside proposals for new housing development outside settlement boundaries will be strictly controlled. Although the policy is of some age, the aim of protecting the character and appearance of the countryside is nonetheless consistent with the Framework.

13. Policy CS5 of the CS seeks to protect Mid-Suffolk's natural environment and seeks development that is consistent with conserving its overall character. Policy NM7 of the NP seeks to protect the scenic value of the landscape and countryside surrounding Needham Market. Local Plan policy CL2 of the LP seeks to safeguard landscape quality within the Special Landscape Area. These policies too are consistent with the aim of the Framework to contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside.

14. Policy GP1 of the LP supports development which maintains and enhances the character and appearance of its surroundings and respects the scale and density of surrounding development.

15. Policy CS4 of the CS addresses the impacts of climate change by seeking to ensure that a risk based sequential approach is taken to determining the suitability of land for development. As such the policy advocates a precautionary approach by avoiding areas of current and future flood risk, and not increase flooding elsewhere. It also seeks to protect people and the environment from pollutants including light pollution and to protect the district's natural capital. Policy NM2 of the NP, amongst other things requires the use of Sustainable Urban Drainage Systems (SUDs) within new development.

16. Policy CS6 of the CS sets out that new development will be expected to provide or support the delivery of appropriate and accessible infrastructure to meet the needs of new development. Policy NM6 of the NP states that new development will be expected to provide for necessary community infrastructure commensurate with the scale of the proposed development.

17. Policies T10, T11, T12 of the LP require safe access and egress from development sites. Together they also seek to ensure that the amount and type of traffic generated by the proposal will be acceptable in relation to the capacity of the road network in the locality of the site, that the proposal will seek improved facilities for cyclists and that development be designed to accommodate the needs of people with disabilities. Policy RT12 of the LP seeks to safeguard existing footpaths and bridleways and to support proposals for their improvement. Policy NM10 of the NP seeks to encourage safe walking and cycling, by, amongst other things, promoting good linkages within and from new developing to the existing footpath and cycle network.

18. Policy CL11 of the LP states that the district planning authority will encourage the conservation of agricultural land and that particular protection will be afforded to best and most versatile agricultural land.

19. Policy CL8 of the LP seeks to resist the loss or significant alteration of important habitats or vulnerable species, consistent with the aim in the Framework to protect sites of biodiversity value.

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20. Policy H17 of the LP states that residential development will normally be refused in areas which are likely to have reduced amenity from noise or other forms of pollution.

21. Policy MP10 of the NP seeks to ensure that development does not constrain the future exploitation of mineral resources.

22. All these foregoing policies are consistent with the aims and objectives of the National Planning Policy Framework (the Framework) and so carry full weight.

23. The site lies outside the settlement boundary of Needham Market. Policies CS1 and CS2 of the CS together set out the spatial strategy for the district and direct new development to within its main settlements. As the site lies outside the settlement boundary it conflicts with these policies. However, these predate the Framework, which does not protect open countryside for its own sake, and this reduces the weight I can attribute to any conflict with them.

24. It is the appellant's contention that the policies most important for determining the application are out-of-date. I do not consider this to be the case. In addition to policies CS1 and CS2 which the appellant refers to,with the exception of GP1, the other foregoing policies I refer to above also make up the "basket of policies" most relevant in the determination of this appeal. As I have found these to be in line with guidance in the Framework I do not, in this case, consider that the "tilted balance" set out in paragraph 11d of the Framework is engaged.

Flooding

25. The site comprises an open agricultural field that rises from south to north. The southern boundary lies along Barking Road which runs parallel to an open watercourse which traverses the southern part of the site. According to the latest available flood maps from the Environment Agency (the Agency) most of the site lies within Flood Zone 1 with the southern frontage of the site which would include the site access lying within Zone 3[2]. This southern section of the site is identified as being as risk from both fluvial and pluvial flooding. Parts of the area of the site identified as falling within Zone 1 are also subject to surface water flooding.

26. The Framework is clear that development which falls within areas at risk of flooding should be subject to a Sequential Test to identify whether such development could be carried out in an area at lower risk of flooding. This approach aims to ensure that decisions on where development is located are taken with a view to directing development away from areas of flood risk. It is only when it has been demonstrated that other sites are not available and the proposal has passed a further Exception Test to demonstrate that the sustainability benefits of the development would outweigh flood risk, that engineering solutions to demonstrate the development is safe for the lifetime of the development can be taken into account. Despite the access to the site clearly being located within Zone 3 no Sequential Test has been carried out.

27. It was put to me that the proposal had undergone a Sequential Test, as the dwellings would be located within Zone 1, and that the access, which would be located in Zone 3, could not be located elsewhere. The parties do not dispute that the proposed dwellings could be located within Flood Zone 1, or that areas

[2]Flood Risk Assessment by JMS Group ref EX1807704 November 2021

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to the east of the site which are at risk of pluvial flooding could integrated into an acceptable SUDs scheme for the site. However, this is a sequential approach to locating development, not a Sequential Test, as set out in the Framework and the NPPG.

28. It was also put to me that the scheme did not need to be accompanied by a Sequential Test, or to undergo an Exception Test, as the access to the site could be considered separately from the dwellings – or rather, development within the site could be disaggregated.

29. I find this argument unconvincing. The access falls within the red line plan submitted as part of the scheme. Without the access there is no proposed means for vehicles to enter or leave the site and the sole purpose of the access is to serve the proposed development. It follows that the access is a necessary part of the development without which the scheme as proposed could not go ahead and it seems to me to be self-evident that the access forms an integral part of the scheme. Consequently, I see no cogent reason why it should be considered separately from the development which it serves and without a Sequential Test the proposal therefore fails to comply with Policy CS4 of the CS and with guidance in the Framework.

30. My attention was drawn to other appeal decisions where various components of a site were treated differently in flood terms. Whether to disaggregate a site is a matter of planning judgement based on the factors relating to each site at the time of the decision and so I see no reason why these other decisions should have a bearing on the scheme before me. However, I note that in the most comparable scheme[3] where the Inspector disaggregated the access from the rest of the development, he nonetheless applied the Exception Test. In another[4] the Inspector also concludes in relation to the terms of the Exception Test, although does not specifically refer to it. In the third[5] the Inspector concludes that the driveway is minor development and so not comparable in any case.

31. Government guidance[6] is clear that within Zone 3a only "water compatible" or "less vulnerable" uses are exempt from the Exception Test. Annexe 3 of the Framework gives no indication that a road serving a residential development could be classified as such. The list is not exhaustive but equally it provides no indication that an access should be considered less at risk than the development it serves. As such, I have no basis for concluding that the Exception Test should be forgone in this case.

32. Furthermore, no flood modelling has been undertaken. Therefore, even if I were to disaggregate the access from the development it serves and also conclude that the scheme brought wider sustainability benefits, I would have no cogent information before me on which to conclude that the scheme was safe for its lifetime and that the Exception Test had been passed.

33. During the Inquiry I was reminded that a secondary pedestrian and cycle access is proposed to the north of the site which could be used for emergency vehicles during a flood as part of a flood evacuation plan. Whilst this could

[3] APP/E2734/W/18/3219294
[4] APP/F0114/W/20/3244862
[5] APP/B3030/W/18/3217750
[6] The Framework and National Planning Practice Guidance Paragraph: 078 Reference ID: 7-078-20220825 – Table 2

potentially be used as an emergency means of access for all vehicles this had not been tested in highway safety terms and was, in any event, not part of the application. Various potential means of alerting residents in the event of a flood which went beyond the submitted evacuation plan and which also did not form part of the application were also discussed. Whatever the merits or otherwise of such measures they do not, to my mind, negate the need for flood modelling at the site that quantifies flood risk for residents and informs any necessary mitigation. I note that subject to appropriate measures to respond to surface water flooding residents' homes would not be subject to flood risk and would not be required to evacuate the site. Nevertheless, taking into account the number of homes and the fact that without flood modelling the likely frequency, duration or depth of flooding is unconfirmed, it would not be acceptable proceed on the basis that future residents could be unable to enter or leave the site by vehicle in a flood event.

34. The appellant has advocated that flood modelling be supplied after approval by way of a condition, but this is to disregard one of the fundamental reasons for the Sequential and Exception Tests in the first place, which is take a precautionary approach and to steer development away from areas at risk of flooding. In the event that post-approval flood modelling confirmed that the access was at risk of flooding, in line with the indicative floodplain mapping and the surface water flooding maps from the Agency[7], future residents would be subject to flood risk.

35. I therefore conclude that the proposal fails to meet the requirements of the Sequential Test and has not demonstrated that the development would be safe for its lifetime without increasing flood risk elsewhere. Accordingly, it fails to comply with Policy CS4 of the CS and with guidance in the Framework which has similar aims.

36. The Council have also referred to Policy NM2 of the NP. This, amongst other things refers to the requirement to integrate SUDs systems into new development wherever appropriate. I was advised at the Inquiry that residents along Foxglove Close[8] had experienced surface water flooding from the site. This evidence is borne out by the flood-risk maps showing areas of fluvial flooding on the site. The appellant has indicated that SUDs would be part of the scheme and that details can be provided at reserved matters stage. I am satisfied that the site provides the potential to accommodate SUDs, albeit with consequential constraints as to how the layout is configured. Notwithstanding the absence of any flood modelling, I have not been provided with any indication that SUDs may not be achievable on the site and that this matter could not be dealt with by condition. I therefore find no conflict with Policy NM2.

Highway Safety

37. The application was made in outline form with all matters reserved other than access. A main access is proposed off Barking Road with a secondary access, for use by pedestrians and cycles, and by emergency vehicles, proposed to the north.

[7] AD13 Flood Risk Assessment JMS Group EX1807704
[8] Evidence of Mr Stannard ID14

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38. The access from Barking Road forms the main access into the site. At the Inquiry I was provided with evidence[9] which indicated that the access may be subject to flooding of a depth greater than 900mm in the event of a flood event. Evidence to the contrary in the form of flood modelling was not provided. Although a raised table junction was put forward as a potential solution, in the absence of information outlining the extent of flooding to be mitigated I agree with the Highways Authority that it is not possible to conclude that such an arrangement would be acceptable. Furthermore, I am conscious that the extent of flooding in this location is likely to extend beyond the site boundary and along Barking Road, so any engineered solution, if appropriate, would need to extend beyond the confines of the site. No such solution has been put forward.

39. The application as submitted includes provision for pedestrian and cycle access at the north of the site and is also intended for use as an emergency access point which it was confirmed at the Inquiry related to the use of emergency vehicles[10]. The access has not been demonstrated to be acceptable for such vehicles by way of a swept path analysis and whilst I accept that large vehicles such as coaches will use part of the access to reach the football ground, I have nothing before me to show that fire-trucks or other large service vehicles could safely access the site in an emergency.

40. Furthermore, it was accepted at the Inquiry[11] that the submitted transport assessment has omitted to include a number of development sites in the area. This has led to inaccuracies in how the baseline traffic data has been calculated. Although it may be that these omissions do not alter the assessment's overall conclusions, their absence undermines my confidence in the accuracy of the assessment. On the basis of the information before me I therefore cannot conclude that traffic from the proposal could be safely accommodated on the wider highways network.

41. On the second issue I therefore conclude that the proposal fails to demonstrate that the development would have an acceptable impact on highway safety. Accordingly, it would conflict with Policies T10, T11, T12 of the LP as it fails to demonstrate that safe access and egress can be provided from the site or to demonstrate that the amount of traffic generated by the proposal can be safely accommodated on the road network. It would also conflict with guidance in the Framework which has similar aims. The Council referred to Policy NM2 of the NP. This relates to the layout of new development, and I do not consider it to be strictly applicable in this case. The Council have also referred to Policy RT12 of the LP and Policy NM10 of the NP in relation to access to the existing footpath and cycle network but as I have found the proposal to be acceptable in this regard I find not conflict with these policies.

Accessibility and Whether the Proposal is in a Sustainable Location

42. The site is located immediately adjacent to the built-up edge of Needham Market. Needham Market is identified in the adopted plan as one of the main settlements where new development will be located over the plan period. The town has a range of facilities available, commensurate with a settlement of its size. It also has some local employment opportunities, local bus services to

[9] Proof of evidence for Flood Risk and Drainage Matters Mr Jason Skilton – Lead Local Flood Authority
[10] Closing Statement on behalf of the appellant - paragraph 67
[11] XX Mr Ayen and his verbal response to questions from the public 10th February 23

Ipswich and Stowmarket and a railway station with links to Ipswich and so on to London. Whilst the settlement lacks a larger supermarket, or a full range of local shops, and many residents would need to travel onwards for work or to attend secondary school, it would nonetheless meet most day to day needs of most residents.

43. Connections from the site would be via foot or bike onto the bridleway to the north or via car, bike or foot from the vehicular access to the south. The northern access would provide a relatively easy and well-defined walking route into Needham Market Town Centre. I noted on site that the route took around 15 minutes at a leisurely pace but is likely to take a little longer for some. I also noted that the sloping nature of the site may inhibit some pedestrians from walking uphill to the northern access and that as such the southern route would be likely to be used in preference.

44. From the southern access the trip into town by foot took slightly longer, although the nearest food store was less than a 10-minute walk away. However, the lack of a direct pedestrian footpath from the front of the site onwards to the footpath network along the northern side of Barking Road was a major impediment. Those on foot would have to cross the road to use the very narrow footway on the far side. This was an unpleasant experience due to the proximity of the vehicular carriageway and the speed at which cars were travelling as they left the built-up area of Needham Market, which appeared to be significantly above the 30MPH speed limit. In my view, this would pose a major deterrent to walking for many. Furthermore, the site lacks opportunities to link the centre of the development into the adjoining urban fabric. As such, given the distance to the northern access, the lack of a southern footpath link is a fundamental failing of the scheme which negates any benefits brought by the proximity of the site to nearby services.

45. During the Inquiry I was advised that a footpath link could be secured by a Grampian condition. A footpath design for the front of the site would normally be expected to form part of the necessary access details. However, as there are no known reasons why a footpath link could not be provided within the lifetime of any permission, I also accept that in this case, the matter could be dealt with by an appropriate condition.

46. Furthermore, I note that the submitted legal agreement makes provision for improvements to the cycle network. Further conditions have been suggested to make provision for a bus link. I note residents' concerns that past attempts to provide better public transport links into town were unable to be sustained due to amongst other things, lack of demand. However, the provision for such a service for a set period allows market demand to be tested in light of the introduction of new residents and is, in my view, necessary, given the number of new residents that would arise from the development and for reasons of air quality. Therefore, provided such measures were secured, the development would make provision for non-car based travel options for those unable to walk or cycle.

47. I also note concerns from residents about existing deficiencies in the public transport network. Whilst I am mindful that this falls short of the linkages available in higher order settlements, subject to measures to secure their improvement outlined above they nonetheless offer a realistic alternative to using the private car.

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48. The appellant argues that the proposal provides the opportunity for sustainable growth which would address the long term needs of the town. I note that the site formed part of a much wider parcel of land which was considered for longer term development as part of the consultation process for the Neighbourhood Plan. I am not fully aware of the considerations which were in front of the Town Council at that time and in any case, I note that the site was not, in the event, allocated for development. This matter is therefore of little relevance to my considerations on whether the site is in an accessible location or whether it is otherwise appropriate for development.

49. I therefore conclude that subject to the necessary conditions outlined above, and notwithstanding conflict with Polices CS1 and CS2 of the CS, the development would be in a sustainable location and provide access to an adequate range of services by means other than the private car. Accordingly, I find no conflict with Policies NM2 and NM10 of the NP and Policies T10, T11, T12 and RT12 of the Local Plan insofar as they relate to accessibility, and which together seek to ensure new development is served by appropriate public transport and pedestrian and cycle links and with the Framework which has similar aims. The Council have also referred to policy CS4 of the CS but this is primarily aimed at adapting to climate change and I do not find the policy to be strictly relevant in relation to the location of development or accessibility of development.

Amenity of Future Residents

50. Needham Market Football Club (at Bloomfields) lies on the opposite side of the bridleway to the north of the site. The indicative layout shows properties a short distance from the northern boundary which sits a short distance from the 3G training pitch which forms part of the club. I was advised during the Inquiry that the 3G is used by a range of youth and ladies' and men's reserve teams who train regularly in the evenings at the club. I observed on site that during a training session light from the floodlights at the facility extended some distance across the northern part of the site. I also noted that noise from the activity at the 3G could also be clearly heard from some extended distance. This noise was derived from intermittent shouting from coaches and teenagers enjoying training and was punctuated by high pitched "rattling" when a ball struck the side fencing.

51. I haven't been advised of any controls over the noise levels that can emanate from the site, or of any specific controls over the number of players on site at any one time, although there are controls over when the floodlights must be switched off[12] which will limit how late training can take place.

52. The Council contend that noise and light from sporting activities at the club has the potential to give rise to a nuisance at the location of some of the proposed new adjacent dwellings. Their concerns relate primarily to noise and light intrusion experienced in external amenity spaces, which could not be mitigated by means of measures such as triple-glazing, and to light intrusion into bedroom windows for dwellings in the north of the site. The application was not accompanied by a noise or light survey. The appellant submitted a noise survey as part of the appeal and relied on a lighting survey submitted with the planning application for the facility at Bloomfields in relation to the impacts of artificial lighting.

[12] Planning Consent for the football ground limits use of the lights to before 9.30PM

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53. Sport England Guidance[13] recommends that external noise levels from the use of Artificial Grass Pitches should not exceed 50dB $LA_{eq\ 1hr.}$ With regard to external amenity space, BS8233:2014 states the following:

"*For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50dB$LA_{eq(T),}$ with the upper guideline value of 55dB $LA_{eq(T),}$ which would be acceptable in noisier environments.*

54. Noisier environments are not defined in the guidance but city centres or locations close to the strategic road environment are used as examples. As the site would, after development, be in an edge of settlement or semi-rural location I consider the lower 50dB$LA_{eq(T)}$ to be an appropriate limit in this case.

55. The submitted survey, when corrected for distance, gives a calculated noise level of 55dBL_{aeq}. I have reservations as to how this figure was arrived at and share the Council's concerns[14] that the initial figure, before correction for distance, was based on a shortened measurement procedure more appropriate for the assessment of road traffic noise, a more continuous noise source than that likely to be experienced at the site. Furthermore, the calculated figure, after corrected for distance, is in excess of that recommended in the Sport England guidance in any case. My own experience at site confirms this. When the 3G is in use, if dwellings were to be located as shown on indicative plans, the noise experienced by residents would be very clearly heard and likely to be perceived by some as intrusive. Whilst I appreciate that this noise source would be very evident to potential residents before moving in, this does not, to my mind, justify providing accommodation where noise is likely to be nuisance, albeit for a limited proportion of the evening.

56. Furthermore, in relation to light intrusion, I noted on site that the extent to which the floodlights illuminated the site extended a noticeable distance within the site. The data relied on by the appellant was a pre-development report carried out before the floodlights were erected. Whilst it gives an idea of potential impact it cannot replace an on-site survey which records actual impact on site. Based on my own observations and the indicative layout, I consider it likely that rooms facing the 3G would suffer from light intrusion. Residents could, at least in part, mitigate these impacts by using heavy curtains and the lights would not be in use at night when most residents will be trying to sleep. However, the effect on external spaces would be more intrusive. When in use the floodlights would brightly illuminate any garden adjacent to the boundary as shown on the indicative layout. As this effect would be intermittent it is likely to be perceived as intrusive and anti-social by any resident who valued the otherwise semi-rural character of the area.

57. It was put to me that existing residents already live near the 3G without undue impact. I noted on site that existing residents are located relatively close to the eastern edge of the 3G, on the opposite side of the carpark. However, the lighting columns at each end of the 3G have less bulbs within them than those on each side and so the light does not extend as far from the facility at this location. Furthermore, in relation to noise, the indicative layout shows

[13] Sport England – Artificial Grass Pitch (AGP) Acoustics – Planning Implications: 2015" (the "Sport England Guide")
[14] Rebuttal Proof Mr Clive Bentley

dwellings sitting closer than any existing dwelling, particularly taking into consideration the layout of the pitches.

58. I have considered how the above impacts could be mitigated. I am conscious that complaints from future residents could impact upon the operation of what, it is clear, is a valued community facility and that complaints can emanate as a result of even low-level intrusion. The provision of a planting buffer would not address noise on its own[15] and similarly the height of the lighting columns means that light intrusion extends above the level of boundary planting. Acoustic fencing needs to be located close to the noise source to be effective which would be along the northern boundary and a fence, or a bund is likely to be visually intrusive[16].

59. It was put to me that simply moving dwellings further into the site, away from the 3G would mitigate against likely harm. I am conscious that the plans before me are indicative only and that layout is not a consideration for this appeal. However, I cannot make assumptions as to the extent to which any setback from the northern boundary can be "absorbed" within a layout, even one with substantial areas of planting as shown on the indicative plans, without knowing how far any set back is likely to be. Whilst the extent of light impact can be guessed from my observations on site, given my reservations in relation to the noise survey I cannot make similar assumptions about noise intrusion. Instead, such judgements should be informed by a thorough and up to date noise and lighting analysis taking account of the operation of the adjacent use. I am therefore of the view that in this case, how noise and light impacts are to be avoided or mitigated is not a matter which can be appropriately dealt with by condition.

60. My attention was also drawn to the potential for noise from road traffic arising from the development and for future residents from the sand-blasting use to the west of the site. However, I am satisfied that this use is strictly conditioned, and that due to its limited nature is unlikely to cause significant disturbance. Furthermore, based on the access arrangements on which the application was advanced, which related only to emergency vehicles in the north, I was provided with no compelling evidence that traffic noise would pose any significant harm to existing or future residents.

61. On the fourth matter I therefore conclude that the proposal has not demonstrated that acceptable levels of residential amenity would be enjoyed by all future residents of the scheme. It therefore fails to comply with policies CS4 of the CS and H17 of the LP which together seek to ensure that residential occupiers are not unduly impacted by noise or other pollution. It would also fail to comply with paragraphs 130 and 174 of the Framework which seeks developments that provide a high standard of amenity and are not put at undue risk from noise pollution.

Landscape and Visual Impact

62. The site lies immediately adjacent to a Gipping Valley Special Landscape Area (SLA) and the deciduous woodland of Spriteshall Grove forms the western boundary of the SLA. The appellant and the Council agree that the landscape and visual effects of the proposal would not extend to long range views of the

[15] Confirmed verbally at the Inquiry by Mr Long in response to my questions.
[16] ditto

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site. The parties' views differ in relation to the impacts that would be mainly experienced within and adjacent to the site and in some mid-range views.

63. Both the Council and the Appellant's assessment of the landscape and visual impacts of the proposal have had regard to the methodology set out in GLVIA3[17]. This sets out that the landscape and visual effects of development can be quantified by identifying the magnitude of change a development will bring about over time (or nature of the effect) in relation to the value and quality of the receiving landscape and its sensitivity to change. By quantifying these variables, which will require some value judgements, a picture of the likely landscape and visual effects of development can be arrived at. Landscape effects can be defined as the effects of the proposal on the landscape as a resource in itself, and visual effects are the effects of a development on views and visual amenity as experienced by people. I deal with these separately below.

Landscape Effects

64. The site comprises a large open field which lies on rising farmland on the eastern edge of the built-up area of the town. The eastern edge of the site abuts the rear boundary of properties along Foxglove Avenue and to the north the site adjoins a Public Right of Way (Bridleway 15), known as 'The Drift', which runs eastwards into Foxglove Avenue and westwards towards Barking. Bloomfields Football Ground adjoins this to the north. Barking Road (B1084) lies in the valley bottom at the southern edge of the site and to the west lies open farmland.

65. Land to the west and south comprises the rolling fieldscape of the Rolling Valley Farmlands Landscape Character Area (LCA) which extends to the valley floor and slopes. Surrounding this, and further afield, the land comprises the flatter arable fieldscape of the Ancient Plateau Claylands (LCA). The land around the site, and the woodland to the west of the site lie within the Gipping Valley SLA. This entire SLA extends some distance to Stowmarket but the area in the vicinity of the site is characterised by an undulating 'rolling' landscape, with small valleys and broad arable fields which are interspersed generously with small copses, hedgerows and woodlands. The topography and tree cover do not allow long range views into or from the site; Instead, it provides a mix of sometimes open, sometimes glimpsed views of the surrounding fieldscape. For this reason, the urbanising influence of the edge of Needham Market is relatively contained and the landscape value of the surrounding area is in my view medium to high.

66. The area in and around the site is attractive due to the available views of an open rolling fieldscape interspaced with mature hedgerows and clusters of trees. It's value in terms of landscape is not elevated by its rarity or the possession of any special features or associations and the site is not publicly accessible and so has no recreational value. The hedgerow to the west along with Spriteshall Grove forms part of the historic field pattern in the area and contrasts sharply with the built edge to the east. The space itself has landscape quality by virtue of contributing to the wider rolling fieldscape which forms a buffer between the town and the SLA. The landscape value of the site therefore appears to lie in its role as a transitional space between the urban

[17] Guidelines for Landscape and Visual Impact Assessment 3rd Edition 2013 by the Institute of Environmental Management and Assessment and the Landscape Institute.

edge and the SLA and I therefore agree with the Council's assessment that the site has medium sensitivity to change.

67. The introduction of built form onto the site would lead to a high level of change in immediate views. Having regard to the value and quality of the landscape and its sensitivity to change this would lead to significant landscape effects at a localised level. However, due to the proximity to existing housing and the lack of visibility of the site in longer range views, the level of perceived change at a wider landscape level would be relatively low. In this regard the proposal would have a limited effect on the character of both LCAs.

Visual Effects

68. Visual effects are normally taken to mean the effects of a proposal on those who would see the development, such as local residents in their homes, walkers, or those driving in the area. The scheme is submitted in outline form but is accompanied by indicative drawings[18] showing the likely extent of development on site. The visual assessments undertaken by both the Council and the appellant assume development that is generally 2 storeys[19] in height. If the development were to be allowed, the main parties agree that a condition could be imposed requiring that the proposal be in general accordance with the extent of development shown on these plans. I have therefore used these plans as a guide to how development is likely to take place on site.

69. Public Right of Way 15 (The Drift) runs along the northern boundary of the site. The change in the views experienced by footpath users in this location would be very significant. Although existing vegetation would partly screen the site from view during summer months as the lane opens up at the ridge, the development would be highly visible. The route forms part of a longer walk across open countryside to Barking. Although the rural character of the site in this location is somewhat degraded by the proximity of existing housing and the 3G training pitch, the open fieldscape of the site nonetheless constitutes part of the open countryside around the town and is experienced as such. The introduction of further housing would diminish this and would have a major adverse effect in localised views in the short to medium term. With mitigation, as suggested on the indicative plan, this would reduce to moderate in the long term.

70. Public Right of Way 26 (The Causeway) forms a continuation of The Drift to the west of the site. From here parts of the urban edge of Needham Market is visible in views back to the east, but these views are broken in part by vegetation and intervening topography. The site itself is not immediately distinguishable for the adjoining fields. The proposed development would be seen in the context of existing development at the urban edge. Boundary planting would moderate views of the development but would not screen it. Therefore, whilst I accept that the proposal provides the opportunity to soften the transition from open countryside to suburban development, the built form that would replace the open field would nonetheless diminish the open and rural views currently enjoyed. In the short to medium term this would cause moderately adverse visual harm, falling to low levels of harm once the landscaping within the scheme was fully established.

[18] AD5 – 043-18-0200_05 – Site Masterplan
[19] Confirmed verbally during the Landscape round table session

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71. Residents along Foxglove Avenue currently enjoy an open view over rolling countryside. Many of the properties have very low rear boundaries to take advantage of this view. The indicative layout shows open space along the edge of the site between these properties and the proposed housing. Views from the rear of the existing properties would therefore be entirely changed from that of open countryside to built development, albeit set some distance from the boundary. This would be very significant adverse effect in the short to medium term and would only be slightly mitigated as the development became established. Drivers along Foxglove Avenue would have transient views between the existing houses which would be experienced within the context of the existing suburban development and the level of harm experienced would be negligible.

72. Users of Barking Road (B1078) would have prominent views of the site both for the extent of the development and for a distance on the approach from the west as it stretches towards the ridge. These views would be partly obscured by Spriteshall Grove and the established hedgerow. From the east road users would be unaware of the development until they are upon it. For drivers or cyclists, the views would be for a relatively short duration and would be seen in the context of the existing development along Foxglove Avenue. However, in these views a large proportion of the development would be visible due to the rising topography, which would only be partially mitigated by landscaping. Taking these factors into account the introduction of further housing would have a moderate adverse effect in these views in the short to medium term. With mitigation, as suggested on the indicative plan, this would reduce to low in the long term.

73. Public Right of Way 50 lies to the south of the site and runs from Barking run up the gentle valley side opposite the site. For most of its way it is enclosed by trees with only glimpsed views of the surrounding countryside. For this reason, only parts of the development will be visible from the footpath, and then only in transient longer distance views which will encompass other existing development. For this reason, the visual impacts of the proposal are likely to be no more than slight adverse for the duration of the development. From Barking Road to the east of the development views of the site are largely obscured by existing residential dwellings and the visual impact, would be very limited.

74. Taken together, the collective visual impacts of the scheme would give rise to significant short term localised impacts for residents and some footpath users. These would be only partly diminished over time. Impacts on road users would be no more than moderate in the short to medium term and these would lessen over time.

Conclusion on Landscape and Visual Impacts

75. Although I have found that the impact on the wider landscape would be relatively limited, the visual effects of the proposal would nonetheless be harmful and would not be mitigated by landscaping. The proposal would therefore harm the appearance of the area and so would conflict with Policy H7 of the LP, Policy CS5 of the CS and Policy NM7 of the NP which together seek to protect the existing character and appearance of the countryside.

76. Local Plan policy CL2 of the LP seeks to safeguard landscape quality within the Special Landscape Area (SLA). As I have found that the proposal would not

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harm the special character of the LCAs it follows that it would also not harm the SLA and I find no conflict with this policy. The Council has also referred to Policy GP1 of the LP. This policy predominantly relates to the layout and design of development, and how it integrates with existing built form. These are reserved matters which are not before me and the indicative layout with the application could be subject to change. Nevertheless, insofar as the policy is relevant to the scheme before me, I find no conflict with it.

Other Matters

Provision of Local Services

77. Local residents have drawn my attention to the provision of services in Needham Market and expressed concern as to the effect that additional households may have on the community. In particular, I was advised of problems at the local health centre where residents have had problems accessing medical care.

78. The Council have sought the views of local health and education providers as part of the application[20]. The CCG have commented that the Needham Market Surgery is operating beyond capacity. However, as the development proposed is of insufficient size to support a new surgery on its own, a contribution will be sought through the Community Infrastructure Levy (CIL) to provide additional floorspace at the existing practice. Furthermore, the County Council as education authority have responded that provision for Early Years Education should be made on site and land has been set aside to accommodate this. Additional funding for primary and secondary school funding is to be made through CIL. The appellant has also provided a contribution towards travel to secondary school within the legal agreement which accompanies the proposal. Provision towards libraries and play-space is also to be sought through CIL. I have some sympathy for residents regarding their difficulties in securing an NHS dentist in the locality. However, this is a national problem and so is not particular to the site. Having regard to the above, I am satisfied that the proposal would make appropriate provision to ensure existing and future occupiers have adequate access to services and I find no conflict with Policy NM6 of the NP or CS6 of the CS.

Ecology

79. The Council refused the application on the basis that insufficient information had been submitted to determine the ecological impact of the development or the nature of any necessary mitigation works. An Extended Phase 1 Habitat Survey, Phase 2 surveys for dormice and reptiles and a Phase 2 Ecological Survey & Assessment report were carried out in 2016. An Ecological Impact Assessment was undertaken in December 2018 with conclusions drawing from the original data and information acquired in the Phase 2 Surveys undertaken in 2016.

80. Following refusal an Ecological Impact Assessment (EcIA) was carried out and published in December 2022. This comprised a desk study of the site and within a 2km surrounding radius, a Phase 1 Habitat Survey of the site boundary and immediate surrounds, static bat monitoring, dormouse surveys, breeding bird surveys of the site, reptile surveys and badger surveys of the site and land

[20] Although the Clinical Commissioning Group(CCG) did not respond to the current application, The CCG previously responded to application ref DC/20/05046. This response is available as ID19

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within 30m of the site boundary. Accordingly, the Council are no longer pursuing this matter as a reason for refusal.

81. The Council have advised that subject to the mitigation measures set out in the EcIA being implemented, and work to demonstrate that measurable net gains for biodiversity can be achieved which should include reasonable biodiversity enhancements aimed at species of conservation concern, then they are satisfied that the proposal would not have an adverse ecological impact. The Council has suggested a condition requiring a 10% net gain in biodiversity. Whilst the appellant disputes the need for this particular requirement, as it is not yet a legal requirement, he does not dispute that the Framework sets out that net gains in biodiversity should be secured through development, or that Council's concerns could be dealt with by appropriately worded conditions and in any case, this is not a matter which would alter my overall conclusions.

82. I therefore conclude that subject to the identified mitigation the proposal would not conflict with policy CS4 and CS5 of the CS and CL8 of the LP which together seek to protect the districts natural capital including rare or vulnerable species, or with the Framework which has similar aims and also seeks to pursue opportunities for securing measurable net gains for biodiversity.

Air Quality

83. The Council considered there was insufficient information to determine whether the traffic movement from the site would impact upon air quality. The Council's concerns related primarily to the effects of additional vehicular trips on air quality within Needham High Street and key junctions around the town, as set out in the comments of the Environmental Health Officer. The appellant has provided an air quality assessment as part of the appeal. This estimated that likely predicted traffic movements from the site will cause an increase in nitrogen dioxide (NO^2) by a maximum of 0.2 micrograms per cubic metre and for particulate matter PM_{10} and $PM_{2.5}$ concentrations by less than 0.1 at nearby residential properties. This is described as negligible. The prediction is based on traffic assumptions from the transport impact assessment, which as I set out above, is undermined by a number of omissions. The commentary provided also does not relate to the town centre, but to the impact at or near the site.

The appellant made a further submission in relation to air quality[21] during the Inquiry which showed that even if traffic from the site were to be doubled there would be no adverse impact on air quality. I also take into account that trips to the town centre from the site will be less than those at the site and that Needham Market is not identified as an Air Quality Management Area. Furthermore, there is no local air quality monitoring information available which could verify the submitted report. The appellant's consultant acknowledges this and identifies that notwithstanding the findings of the assessment a precautionary approach should be taken by implementing mitigation measures to reduce emissions arising from the site. This appears to me to be a prudent approach. Although no such measures have been specifically advocated for that purpose the matter has some overlap with the measures set out above to improve accessibility to the site. I am therefore satisfied that measures to mitigate the potential effects of vehicular emissions

[21] ID30 Response to Mid Suffolk District Council's rebuttal on air quality for the proposed development on Barking Road, Needham Market IP6 8EZ

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on air quality could be secured by condition and would be sufficient to ensure the proposal did not have a material impact on air quality. On that basis I find no conflict with policy CS4 of the CS and H17 of the LP which together seek to protect people and the environment from unsafe or unhealthy pollutants, and with the Framework, which has similar aims.

Heritage Assets

84. The Grade II Listed Kennels Farmhouse lies to the south-east of the site. 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*'.

85. Kennels Farmhouse is located on the opposite side of Barking Road a short distance from the southern boundary of the site. The building dates from around 1700 with later additions. The significance of the asset lies largely in its status as a relatively well-preserved example of a building of its age and type and in the antiquity of parts of the structure. Due to the intervening vegetation, there is no visual link between the asset and the site. Furthermore, although the wider rural setting of the asset contributes in part to its significance, that wider setting comprises immediate countryside on all sides of the asset, with the urban fringe of Needham Market lying beyond, with very limited intervisibility of built form with the asset. The proposal would not significantly alter the existing context in which the asset is enjoyed. Nor would it significantly diminish the extent of countryside around the asset, when the totality of the wider setting is taken into account. It follows that the proposal would have a negligible impact on the wider setting of the asset and a neutral effect on its significance. Accordingly, this matter is a neutral factor in the planning balance.

Minerals

86. The Council initially contended that insufficient information had been submitted to determine the size of sand and gravel deposits at the site and whether it was economically viable to extract these minerals or use them in the construction of the site. During the Inquiry the Council confirmed that the site was not in a Mineral Safeguarding Zone and so consequently it was no longer defending its eighth reason for refusal.

87. In the absence of any evidence to support the view that the proposal would prejudice the future extraction of minerals I find the proposal would not conflict with policy MP10 of the SWMP which seeks to prevent the sterilisation of minerals resources or with guidance in the Framework, which has similar aims.

Agricultural Land

88. The site is made up of 15 hectares of Grade 2 agricultural land. Local residents have also expressed concerns in relation to the loss of this asset. Policy CL11 of the LP seeks to protect best and most versatile agricultural land. The appellant

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has not carried out a comparative assessment to indicate that no lower grade land is suitable and available, although neither the plan nor the Framework requires one. The size of the site also falls below the threshold at which statutory consultation would be required[22]. The Framework nonetheless recognises the economic and other benefits of maintaining a supply of such land and the permanent loss of the site from production would not comply with the aims of Policy CL11. This matter therefore weighs against the proposal in the planning balance.

Other Matters

89. Some local residents have raised concerns in relation to the effects of the proposal on the amenity of occupiers of properties on Foxglove Close, which back onto the site. I noted on site that the rear boundaries to many of these properties were low or open, and that in some places the adjoining land was at a significantly higher level that the dwellings. However, having regard to the indicative layout I am satisfied that appropriate separation distances could be arrived at that protected the living conditions of residents.

90. I also note concerns in relation to foul drainage. I have no substantive evidence to indicate that foul water cannot be drained by means of the mains sewers and so I am content that this matter could be addressed at reserved matters stage.

91. During the Inquiry I was provided with details of a recent decision by the Secretary of State[23] where the SoS issued a "minded to grant" decision pending receipt of further highways details. It is the appellant's contention that this approach could be implemented in this case. The details of the case, which related to the provision of a new prison, do not appear to be comparable to the appeal before me. Furthermore, it is an established principle[24] that the appeal process should not be used to evolve a scheme and that it is important that what is considered at appeal is essentially what was considered by the local planning authority, and on which interested residents' views were sought. In any case, I find no persuasive grounds for allowing a second opportunity to submit details that should have been addressed before the application was submitted.

92. The appellant has expressed concerns in relation to how the application was handled by the local planning authority, and in relation to interactions with statutory consultees. Such concerns are a matter for the Ombudsman. It has also been put to me that the Council were inconsistent in how they handled the application before me and previous applications at the site. I do not consider this to be the case. Decisions are based on the factors that are material at the time and on the nature of the development proposed. The 2016[25] application was for a significantly different application which was determined when the Council did not have a 5-year housing supply and was, in any case, refused. Other than issues relating to the need for infrastructure, which the appellant accepts, the 2020[26] application was refused for the same reasons as the

[22] Statutory Consultation under the Development Management Procedure Order
[23] APP/D2320/W/22/3295556 – ID24

[24] Planning Inspectorate's Procedural Guide: Planning Appeals – England
[25] Ref 3506/16
[26] Ref DC/20/05046

application before me. I therefore find no inconsistency in the stance the Council has taken to the site.

The Planning Balance

93. For the reasons outlined above I find that the proposal would fail to meet the requirements of the Sequential Test and has not demonstrated that the development would be safe for its lifetime without increasing flood risk elsewhere. Accordingly, it fails to comply with Policy CS4 of the CS. This matter on its own is determinative.

94. Furthermore, the proposal has failed to demonstrate that the development would not prejudice highway safety and so would conflict with Policies T10, T11, T12 of the LP.

95. The submission has also failed to demonstrate that acceptable levels of residential amenity would be enjoyed by all future residents of the scheme and so conflicts policies CS4 of the CS and H17 of the LP.

96. The proposal would also harm the appearance of the area and so would conflict with Policy H7 of the LP, Policy CS5 of the CS and Policy NM7 of the NP which together seek to protect the existing character and appearance of the countryside. There would also be conflict with Policy CL11 as the site would be lost from agricultural production.

97. I have found no harm in relation to minerals, air quality and heritage assets and subject to appropriate conditions or provision in the legal agreement, the location of the development could be made accessible and there would be no harm to ecology and the provision of local services.

98. The proposal would provide 279 houses, 100 of which would be affordable, and which would be in a location that could be made accessible. Although the district can demonstrate a healthy housing land supply, this is nonetheless a material benefit in the context of a national housing shortage. The development would bring economic benefits during the construction phase and benefits from increased spending by residents once the development is completed. It would also provide some ecological benefits, through measures to secure biodiversity net gain on site. I attribute these matters some moderate weight in favour of the proposal.

99. The appellant has put forward a range of other benefits, including CIL contributions, the provision of recreational open space and the provision of an early years education setting. However, these measures are in place to mitigate the impacts of the development and to address the needs of future residents and so I attribute them no more than limited weight as planning benefits.

100. Section 38(6) of the Planning & Compulsory Purchase Act 2004 states that applications should be determined in accordance with the provisions of the Development Plan unless other material considerations indicate otherwise. Having regard to the collective benefits of the scheme these do not justify determining the proposal otherwise than in accordance with the development plan taken as a whole.

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Conclusion

101. Accordingly, for the reasons given above, and taking account of all other matters raised, I conclude that the appeal should be dismissed.

Anne Jordan

INSPECTOR

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APPEARANCES

FOR THE APPELLANT:

Howard Leithead of Counsel

He called:

Mr Jason Parker BSc (Hons) MRTPI of Parker Planning Services

Magnus Magnesson BA(Hons) BSc MRTPI of Parker Planning Services

Rupert Evans MSc CEnv C.WEM MCIWEM PIEMA of Evans Rivers and Coastal

Nick Long MSc BA(Hons) IEng MIOA of Stansted Environmental Services

Kevin Ayen (BSc Civ Eng, MCIHT) of Ayen Consulting

Lisa Finch BA (Hons) CMLI of Classic Landscape Architecture LTD

FOR THE LOCAL PLANNING AUTHORITY

Richard Ground KC

He called:

Steve Stroud BA(Hons) LLB(Hons) MA MRes MSc MRTPI of Babergh and Mid Suffolk Council

Graham Robertson HND of the Environment Agency

Jason Skilton FDsC BTEC ND of the Lead Local Flood Authority

Jasmine Whyard BA MSc MRTPI of Babergh and Mid Suffolk Council

Luke Barber HND Mech Eng BSc of Suffolk County Council

Mr Ryan Mills BSc (Hons) MSc CMLI of Mid Suffolk Council

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INTERESTED PARTIES:

Josephine Lea - Needham Market Town Council Chairperson

Martin O'Shea – Needham Market Town Council and Architect

Rosamund Fellows - Barking Parish Council

Mike Morris – Mid Suffolk District Council

Mr Stansfield – Needham Market Town Council

Lynn Blower – Local Resident

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John Milrow – Local Resident

Ken Grove – Local Resident

Margaret Hedges – Local Resident

Mr Lawrence – Local Resident

Ruth Coomber – Local Resident

John Reardon – Needham Market Town Council

Melvyn Bloomfield – Needham Market Football Club

Sam Roland – Local Resident

Ray Durrell – Local Resident

Ben Ramsey – Local Resident

Margot Poulding – Local Resident

Mark Stannard – Local Resident

Roger Lack – Local Resident

Ronald Davies – Local Resident

Mr Jerrell – Local Resident

Elise Hampson – E H Planning Services

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DOCUMENTS SUBMITTED AT THE INQUIRY

ID01 – S106 Unengrossed (agreed draft version)

ID02 – Title No SK100533

ID03 – Title No SK137247

ID04 – Appellants' opening statement

ID05 – Council's opening statement

ID06 – Submission form Needham Market Society

ID07 – Previous Permission Ref 3506/16

ID08 – Wathen-Fayed v Secretary of State for Levelling Up, Housing and Communities [2023] EWHC 92

ID09 – Extract from Environment Agency national mapping website

ID10 – TA Addendum

ID11 – Photos of flooding on Barking Road 15th November 2020

ID12 – Photos of floodlights at Needham Market Football Club 3G

ID13 – Sport England Design Guidance Note

ID14 – Email for Mr Mark Stannard – details of flooding to his home

ID15 – Copy of decision ref DC/20/05046

ID16 – Copy of Corbett Judgement

ID17 – Copy of policy H17

ID18 – Letter from Suffolk County Council – dated 23 December 2021 regarding developer contributions

ID19 – Letter from NHS Clinical Commissioning Group dated 26 November 2020 relating to primary healthcare provision

ID20 – Revised schedule of conditions

ID21 – Additional suggested conditions relating to highways

ID22 – Further suggested conditions

ID23 – Extract from Gov.uk regarding local school capacity

ID24 – HMP Garth decision

ID25 – Sport England Design Guidance Note – Artificial Sports Lighting 2012

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ID26 – Closing submissions on behalf of the Council

ID27 – Closing submissions on behalf of the Appellants

ID28 – Council's application for costs.

ID29 – Email trail – 22 Feb 2022 to 11 March 2022 regarding extension of time

ID30 - Response to Mid Suffolk District Council's rebuttal on air quality for the proposed development on Barking Road, Needham Market IP6 8EZ – 14th February.

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