



# MELTON PARISH COUNCIL

28 November 2017

Tim Salter  
Planning Inspectorate  
Room 30 Kite Wing  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

**Your ref: APP/J3530/W/17/3183249**

**To be sent via email to: [Tim.Salter@pins.gsi.gov.uk](mailto:Tim.Salter@pins.gsi.gov.uk)**

Dear Mr Salter,

**Appeal by Christchurch Land & Estates (Melton) Ltd re land off Yarmouth Road, Melton  
Planning application reference DC/16/4770/OUT**

In the light of the appeal by Christchurch Land against the decision of Suffolk Coastal District Council to refuse planning permission for the above scheme, Melton Parish Council wishes to submit additional comments to the Inspector.

**The appeal case and sustainability**

The appellant's case is primarily that, in the context that it is argued the District Council cannot demonstrate a five year housing land supply, paragraph 14 of the National Planning Policy Framework (NPPF) applies and, on the basis that the site is considered sustainable, permission should be granted.

Melton Parish Council considers that, even if the District Council is unable to demonstrate the required 5 year land supply, and the presumption in favour of sustainable development set out in paragraph 14 of the NPPF is engaged, the site itself and the appellant's proposals do not constitute sustainable development. The reasons may be restated and updated as follows:

- The proposed development is out of scale with the existing settlement of Melton and the scale of development proposed, coupled with already approved developments, would put considerable additional strain on existing services, facilities and infrastructure
- There is poor connectivity between the application site and the built up area of the village, and also with Woodbridge. Accessibility even with the proposed footway widening along Yarmouth Road is poor. The applicant's submitted Travel Plan seems unrealistic at best. The distance between the centre of the proposed development and Melton Station is about 1.6km. With only very limited facilities available in Melton village, it is over 2km to Woodbridge, and the Travel Plan itself acknowledges that the greatest potential to replace car journeys with walking is in respect of journeys of under 2km. Bus services from Yarmouth Road to Woodbridge are (weekdays) four per day from Framlingham and less than hourly from Aldeburgh, with only the Aldeburgh – Woodbridge service available on a Saturday. Whilst additional services are

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available from the bus stop outside Melton Chapel in The Street, Melton, that bus stop is about 1.4km from the development with no effective safe, continuous footpath between the two points. Invariably nearly all journeys to and from the new development would be vehicle based. The Parish Council does not in fact consider that the requirement in Paragraph 35 of the NPPF to “give priority to pedestrian and cycle movements and have access to high quality public transport facilities” is capable of being met by this application because of the site location. Policy MEL 2 in the Melton Neighbourhood Plan (see below) seeks positively to provide improved access for cyclists and pedestrians, but the connectivity of this location in that context is considered unsustainable.

- The additional traffic likely to be generated by a development of this scale would have significant wider impact on the local highway network, including the A1152 Woods Lane / Wilford Bridge Road / B1438 The Street / Melton Road junction. Existing and proposed developments will already serve to exacerbate the position here to the detriment of both traffic flow and the greater loss of amenity to the residents in The Street, Melton, and the wider Conservation Area. Suffolk County Council as Highway Authority has recommended refusal of the application unless / until a satisfactory traffic model of the above road network and junction is supplied. The Highway Authority considers this essential to enable a determination of whether the planning proposal is acceptable or whether mitigation is required to ensure that the development does not create severe congestion or is detrimental to highway safety. The Highway Authority also states that there are emerging air quality issues on The Street, Melton and increasing queue lengths on this arm of the junction may lead to unacceptable air quality levels. Also details of proposed improvements to the footways between the site and Melton have yet to be received by Highways. Melton Parish Council is itself aware that there have been a number of accidents and near misses on the section of the Yarmouth Road near to the site, including injury to a pedestrian. Any significantly increased traffic levels would lead to more such instances.
- The appeal site lies in open countryside outside the physical limits of Melton. The proposal is in conflict with the Melton Neighbourhood Plan as well as the Development Plan and would be harmful to the rural landscape character, nor does it meet any of the special circumstances set down in paragraph 55 of the NPPF.

### **Melton Neighbourhood Plan**

Suffolk Coastal District Council's Site Allocations and Area Specific Policies Development Plan document was adopted by Suffolk Coastal District Council on 26 January 2017 and is now formally part of the District's Development Plan. Given existing permissions / build outs (including the 180 dwellings represented by the planning permission for the Woods Lane site) the plan identifies a need for a further 10 new dwellings in Melton. The identification of the site(s) for those dwellings will be made via the *Melton Neighbourhood Plan*. The Neighbourhood Plan has now been through the examination stage and recommended to proceed to referendum. The referendum will take place on 7 December 2017. The Plan makes provision for an additional 55 units of new housing, with one-third affordable. This is substantially in excess of the number identified in the site allocations plan. This level of provision is acknowledged in the report of the Independent Examiner into the draft Neighbourhood Plan at paragraphs 4.10 and 4.17. Therefore the Neighbourhood Plan can be said to reflect an approach to housing growth which significantly lifts housing supply in both the parish and district. Furthermore the site for this additional housing whilst not currently identified for development is considered deliverable.

The current appeal proposal is contrary to Neighbourhood Plan Policies MEL1 (physical limits boundaries) and MEL17 (areas to be protected). If the result of the referendum is a YES vote, then the Plan should be adopted within the following eight weeks. Even in its current pre-referendum state, the Neighbourhood Plan should be attributed significant weight in accordance with paragraph 216 of the NPPF. Once made, the NPPF makes it clear that “where a planning application conflicts with a Neighbourhood Plan...planning permission should not normally be granted.”

## Written Ministerial Statement

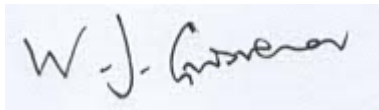
The Inspector will be aware of the written ministerial statement of 12 December 2016, which made it clear that relevant policies for the supply of housing in a neighbourhood plan, that is part of the development plan, should not be deemed to be out of date under paragraph 49 of the NPPF where all of the following circumstances arise at the time the decision is made:

- The written ministerial statement is less than 2 years old, or the neighbourhood plan has been part of the development plan for 2 years or less;
- The neighbourhood plan allocates sites for housing;
- The local planning authority can demonstrate a 3 year supply of deliverable housing sites.

On the basis that the District Council does have *at least* a 3 year supply of deliverable housing sites it is submitted that the WMS should be considered a material consideration in this planning decision. On that basis also, the following existing policies of Suffolk Coastal District Council should apply, as well as those contained in the Neighbourhood Plan:

- The application site lies outside the built up area of the village and under the current Suffolk Coastal District Council Local Plan Core Strategy and Development Management Policies is classified as countryside where no development other than in necessity or special circumstances (Policy SP29) or under the exceptions set out in Policy DM3 will be allowed.
- The proposed development is out of scale with the existing settlement of Melton, and runs counter to Suffolk Coastal District Council Policies SP2 and SP19, which seek to relate the scale of development to appropriate locations. Although Melton *village* is classified as a key service centre (Policy SP27) this Policy envisages minor extensions / small scale developments either abutting or within the defined physical limits.
- The physical limits boundaries stated in Neighbourhood Plan policy MEL 1 should be afforded full weight for controlling development in the countryside.

Yours sincerely,



William Grosvenor

Clerk to Melton Parish Council

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