



# MELTON PARISH COUNCIL

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**PLA(22)101.01**

**Response to Appeal APP/X3540/W/22/3300310 Land off St Andrews Place and Waterhead Lane  
St Andrews Place**

Dear Sir

**APP/X3540/W/22/3300310 Land off St Andrews Place and Waterhead Lane St Andrews Place,  
Melton, Suffolk (District Council Ref: AP/22/0044/REFUSE)**

Melton Parish Council has raised objections against the above planning application for the following reasons:

1. That the roads leading up to the development site through Melton and specifically through St Andrews Place are long and too narrow to allow the safe passage of construction traffic;
2. That the proposal to implement a Temporary Traffic Regulation Order (TTRO), to ensure that narrow sections of the route to the construction site along St Andrews Place are kept free of on street parking and relocated elsewhere, is unworkable.
3. That large vehicles like emergency services, refuse collection vehicles and delivery services would not be able to access the new dwellings safely via St Andrews once the new housing estate is opened;
4. That the planning application does not meet what was formerly agreed and confirmed in writing as attainable by the Warburg Dawson Partnership during the consultation and examination period of developing the Melton Neighbourhood Plan;
5. That the current application would prevent the delivery of the Melton Neighbourhood Plan MEL20 and in particular, the requirements for useable public green space for community use (communal gardens, allotments and a children's play area) would be unachievable;
6. That the current application will not provide sufficient mitigation for the loss of a key bio diversity site in an area surrounded by Special Protection and Ramsar sites; and
7. That the development of an attenuation pond on a wetland area adjacent to residents' houses will exacerbate the flood risk for neighbouring properties.

**St Andrews Place**

St Andrews Place is an estate of 121 dwellings made up of 16 maisonettes, 12 Flats, 12 terraced houses, 30 semi-detached houses, 6 detached houses and 44 bungalows. There is some private ownership, but a large number of properties are owned by Newtide Homes (formerly Flagship Homes), a housing association providing dwellings including adapted properties to support elderly and disabled residents.

The estate has a community feel with an active residents group. During Covid and subsequently for the Jubilee and on other occasions, the community has taken to the streets to support each other during both difficult and happier times. There is a community garden set away in one corner of the estate with a community orchard sponsored by the Housing Association and a local environmental group called Transition Woodbridge who are dedicated to doing what they can to improve the area and limit climate change. The residents are active in maintaining this area and watering the new trees.

The roads are long and narrow for most of the length of the estate, with some sharp bends. The width is restricted to 3m if a car is parallel parked to the kerb. Parking is at a premium. 49 dwellings have no access to any off street parking. There is also a lack of sufficient off street parking for the rest of the estate and as a result, residents and visitors regularly have to park on the road including those who have to use box vans for their on call work. Residents find they have to park on the grass verges or with the wheels of the vehicles mounted onto the pavement in order to allow other vehicles the necessary safe access further into the estate. The close proximity to Melton Railway Station, the local church and other village amenities means that cars not associated with residents are parked in the estate on occasions, exacerbating the problem.



*Top left photo taken looking towards the access of the development site; Top right taken from the gates currently securing the site.; Bottom left shows parking in the turning circle immediately before the site; Bottom right shows the narrowness of the road leading immediately into the road up to the development site.*

## Highways Objection

On the 22<sup>nd</sup> July 2020 (ref:SCC/CON/2825/20) the Highways Authority requested amendments to the highway related plans because of concerns about the sustainability of access through St Andrews Place to the development site. Further plans were submitted. However, the Highway Authorities maintained its objection because of concerns relating to construction access, traffic impact and sustainable access remaining (SCC/CON/1831/OUT). Despite further attempts at amendments being made, this objection by the Highways Authority has remained consistent throughout. The Highways Authority report dated 21<sup>st</sup> September 2021, noted that *'the addition of a tracked plan 4465-0104 P07 showing a 10.1m rigid vehicle passing partially through St Andrews Place does not demonstrate that construction vehicles can safely navigate the residential area even without parked cars in the vicinity. Construction HGVs are usually considerably longer and articulated. **Subsequently, the objection from the Highways Authority remains'**.*

## Developer's Mitigation

This objection appears to be supported by the Developer's Transport Planning Consultants, Paul Basham Associates Ltd. They suggest that a Temporary Traffic Restriction Order (TTRO) banning on street parking along the route taken by construction vehicles might be needed in order to allow access. The tracking diagram shows the very tight movement of a 10.1m rigid HGV passing through the approaching roads to the development (Appendix B). It assumes no vehicles are parked on the road and as stated before Highways do not believe that construction vehicles can safely navigate even without parked cars.

## District Councillors Objections

District Councillors noted that *'accessing the application site would require navigating the full length of the close which includes a number of bends and junctions. St Andrews Place is not considered suitable as a route for construction vehicle access due to the aforementioned issues. Although construction traffic would be a temporary situation, it would continue for a significant period of time and this would be detrimental to the safety of users of the highway.'*

*The site is also located very close to the Melton signalised crossroads (junction of the A1152 and B1438) and as detailed in the submitted Transport Assessment, the junction suffers from congestion (over-capacity). This proposal will impact upon the junction and result in a significant delay particularly on The Street and therefore should be mitigated in accordance with paragraph 110(d) of the NPPF.'*

*'The site is also located very close to Melton Railway Station and the proposed development should maximise the opportunity for occupiers to use it as an alternative to motor vehicle travel. It is therefore essential that a direct route south from the application site to Wilford Bridge Road is provided'.*

As a result, they refused the planning permission.

## Residents and Melton Parish Council's Concerns

The developer has offered to build 11 parking bays to remove parked cars from the estate road to be used for access. However, as can be seen from the photos below and from the Melton Parking Survey of Vehicle Locations dated 21<sup>st</sup> April 2022, 12:00 (Appendix A) performed by Paul Basham Associates Ltd on behalf of the developer, vehicles are commonly parked along the route needed for larger vehicles to pass. On the day of their surveys, there were on average 32. It should also be noted that the 21st April 2022 was the Thursday after Easter Monday 2022, so it is questionable whether this was a representative sample of a typical working day. All surveys included in the pack were done within that week.





Despite the congestion, the social housing of St Andrews Place currently offers a safe environment for elderly and disabled residents along with social housing for families with young children, many of whom attend the local school. Children can be seen playing out on their bikes and with their friends after school, during school holidays and at weekends. Residents need to pass through Station Road and The Street on their way to the school and other local amenities. Both these roads are narrow with narrow pavements. Local residents often have to step into the road when meeting people coming in the opposite direction. 5 years ago, a child was hit by a car in Station Road because they stepped out between two parked cars. Fortunately, the child was not seriously hurt. The car was travelling quite slowly. Had this been a larger or faster vehicle, the outcome could have been very different.

As a result of these factors, residents and Melton Parish Council feel that the current proposal presents an unacceptable level of danger to local residents walking or cycling through the village.

### **Restriction of Parking to allow Access**

The Developer has suggested that a TTRO *'might be necessary to ensure that narrow sections of the construction route along St Andrews Place are kept free of on street parking and relocated elsewhere'* to allow the movement of large vehicles (Paul Bashams Associates Ltd Report No 1026.0001/TAS/2 Page 8). It has been suggested that residents could park elsewhere on the estate but the estate is already heavily congested with parking throughout. We can't see how the displaced vehicles could be accommodated on the estate or more widely in the village as Melton is also congested and has limited parking provision.

Disabled parking for local residents who routinely use wheelchairs or walking aids and who by the nature of their disabilities need to be able to park in close proximity to their properties is not taken into account. Nor does the proposal take into account the need to provide parking for carers and visitors to this area of more vulnerable residents.

The Developer has stated in his appeal that *'The construction period will likely last no more than 2 years and probably less'* (page 30) but in the planning application, it has stated that development is likely to take up to 5 years. The proposal does not consider the increased parking that will occur as a result of construction workers needing to park their vehicles locally in order to access the development site whilst building is underway.

### **Long Term Effect on St Andrews Place**

This proposal does not consider the problems that will exist for larger vehicles such as refuse vehicles, delivery vehicles, emergency services, removal firms, etc, needing access indefinitely once the new estate is built. All traffic will need to pass through the long and narrow streets of St Andrews Place. Already, refuse vehicles and larger vehicles including emergency services have to

mount the pavements on occasions to access the lower end of the estate. When the new estate is open, it is inevitable that the Temporary Traffic Order would have to be made permanent just to allow safe and unobstructed access for traffic accessing the new development.

This is unacceptable. It will have a lasting detrimental effect on the current residents of St Andrews Place, their ability to park in close proximity to their properties and the opportunity to celebrate the community aspects of the estate.

### **Delivery of MEL 20**

The Developer has asserted that *'the principle of the appeal proposals is supported by the Neighbourhood Plan policy MEL 20'*. We disagree.

MEL20 states that

- The provision of at least 9,000m<sup>2</sup> of serviced B1 floor space; **and**
- Ancillary retail to support the B-class commercial development; **and**
- The provision of approximately 55 dwellings which provides a mix of dwelling sizes (market and affordable) that meets the needs of Local Plan Policy SP3; **and**
- Affordable housing which meets the requirements of Local Plan Policy DM2; **and**
- Ensuring that no direct access is provided to the public right of way on the northern boundary of the site from the residential development; **and**
- [deliver] community uses, including a public green space for community use, a lake, communal gardens, allotments/community growing spaces, café, a children's play area and potentially a community farm and After School and Holiday Club; **and**
- In order to minimise activity on the Deben Estuary, ensuring that the publicly accessible open space provided on-site is located between the residential area and any access point to the Deben Estuary; **and**
- Landscaping; **and**
- Ensuring that development does not have an unacceptable impact on the Special Landscape Area; **and**
- Access, ensuring that options are explored to avoid a single vehicular access onto the A1152 subject to demonstrating that this would not have a detrimental impact on the access for residents adjacent to the development; **and**
- The provision of a flood risk assessment; **and**
- The provision of appropriate utilities infrastructure, including drainage, in order to service the development once occupied; **and**
- The protection, where possible of protected trees; **and**
- A project level Habitats Regulation Assessment should be carried out and measures should be secured to ensure that the development does not have an adverse impact on international habitats; **and**
- Development should avoid having an adverse impact on Protected Species and Priority Species and Habitats.

The policy is clear that the whole area is designated for a mix of uses including community and recreational space. Indeed the Developer acknowledged this fact in his letter of the 9 June 2017 (Appendix E para 4) where he stated that *'This site offers an extraordinary opportunity to create*

*something very special, however the successful viability of the development requires the comprehensive development of all the elements together, commercial, community and residential’.*

It is true that some development has taken place at Riduna Park in delivering quality office and commercial units along with a café and local business. However, in coming forward with an application to provide solely residential use and an attenuation pond with some limited green space, it fetters the ability to deliver the rest of the allocation. The residential elements create the financial value at least in part, to fund the delivery of the mix of uses allocated and without a proposal for the wider scheme, it is doubtful that the other important aspects of the scheme will be deliverable.

### **Neighbourhood Plan – Basis for the referendum**

When developing the Neighbourhood Plan, residents of Melton raised a number of concerns associated with an increase in traffic passing through the wider village and specifically through St Andrews Place. Many residents raised concerns about construction traffic accessing the development site via St Andrews Place. The Planning Examiner also raised concerns about access to the site when reviewing the Neighbourhood Plan prior to it going to referendum and being made (Appendix D).

Assurances were sought and received from the developer, Mr Dawson, by Melton Parish Council. He also stated in writing to the Planning Examiner that *‘this extensive process has involved entering into formal agreements with Colin and Edward Carter for the commercial haulage site, Bill Warburg for the residential land and Barrie Emerson for the access through his site. All these agreements are in place (Appendix E para 3).* As a result, residents were assured by Melton Parish Council that this was the case, and the Neighbourhood Plan went to referendum on this understanding.

It subsequently transpired that this was not the case. Only when this planning application came forward was Melton Parish Council informed that no agreements were in place.

Melton Parish Council met with the landowners to see if a deal might be brokered and were then told that there had been no engagement whatsoever with at least one of the landowners who would have been needed to deliver the comprehensive plan. There hadn’t been any **investigation of a viable and safe alternative access to the development that would avoid a detrimental impact on access for residents adjacent to the development or for the delivery of the other benefits of MEL20.**

Therefore, the Parish Council feels it is disingenuous to state in para 2.2. that *‘the proposed access through St Andrews Place is required due to the wider development areas, including access via land to the south being unachievable and outside of the applicants ownership.*

### **Neighbourhood Plan – delivery of the community and other benefits**

As part of the Melton Neighbourhood Plan review, Suffolk Wildlife Trust undertook a landscape and ecological evaluation of the Parish. This included an assessment of the MEL20 allocation and the application site. The report considers that the site is likely to support various protected species. The Suffolk Wildlife Trust report, on page 40, states that *‘whilst the low-lying nature of this part of the site means it is unlikely to be chosen for housing, it is vulnerable to other impacts such as the need for remodelling of the site to accommodate sustainable urban drainage schemes or the proposal for a lake as mentioned in the existing Neighbourhood Plan. Given the sensitive nature of the wetland*

*parts of this site and also depending on the outcome of surveys, this should be used to inform the decision making on how best to utilise the site whilst avoiding and mitigating for any impacts. Should the wetland area be affected by future proposals, then this is likely to have a negative impact upon the biodiversity of this area. Consequently, in order to deliver overall biodiversity net gain, it is likely that off-site compensation may be required. Consideration should therefore be given to protecting this area from any future development that would require remodelling, reshaping or introducing drainage’.*

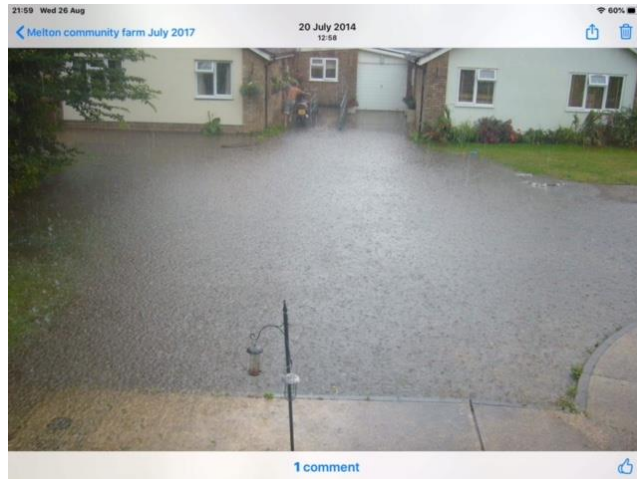
In Section 4, Page 4 of the Design and Access Statement submitted by the Developer, it states ‘*the illustrative layout includes substantial areas of open space to the south of the residential area which should contribute to the community uses element of MEL20 and includes the more ecologically diverse parts of the site’*. James Meyer, Ecologist for East Suffolk, reviewed the Habitats Regulation Assessment (HRA) and concluded that ‘*this application only partially meets the MEL20 policy requirement where it states that the public open space should be provided between the residential development and any access point to the Deben Estuary because this application only covers the northern part of the allocated site. Developments of this scale are expected to include adequate onsite public open space and that they are delivered in such a way that they do not result in increased recreational pressure on European Designated Sites (in this case particularly the Deben Estuary SPA and RAMSAR site, as well as the nearby Sandlings SPA). Whilst an area of open space is proposed as part of this development, it is comprised of largely wet habitats unsuitable for recreation. The lack of delivery of the area identified for open space in the NP creates a significant shortfall in the provision of publicly available recreational space and therefore the provision currently proposed is likely to be insufficient to address the requirement to deliver alternative recreational space away from European designated sites’* (Appendix C). He goes on to say that ‘*As currently presented I consider that there is insufficient information provided to enable the Local Planning Authority to conclude a favourable HRA of this application as, based on the information available, the scheme as proposed currently appears to contain insufficient mitigation measures to prevent an adverse effect on the integrity of the European designated sites’* (Appendix C).

We note the application does not propose to provide any form of vehicular access through the site to the land to the south, therefore adversely affecting and completely restricting the ability to access the south of the development. MPCs ability to deliver the important parts of MEL 20 associated with the community benefits will therefore be curtailed if this plan goes ahead in its current form.

This demonstrates why a comprehensive approach is now essential and why the application site cannot be considered in isolation. The proposed layout completely cuts the green areas off from the Deben Estuary which is a major biodiversity asset and proposes an attenuation lake on wetland habitat in an area that has already experienced surface water flooding. It is important that the newly created biodiversity features reduce flood risk, create wildlife zones and do not act as a barrier to wildlife corridors or the feasibility of delivering MEL20.

## **Flooding**

Lower parts of St Andrews Place have already been affected by flooding from run off in the last 5 years. Although this was caused by a number of issues in the soil within the development site and in the ability for the drains to cope, residents have already suffered the disruption and worry of having their properties threatened.



With an attenuation pond being proposed in this wetland area next to the residents' houses, they are naturally fearful that the disruption caused by flooding will occur again and might be worse as a result of the heavy downpours we are now experiencing because of climate change.

### **Delivery of the Neighbourhood Plan and an alternative access**

As part of a programme to refresh the Neighbourhood Plan, Melton Parish Council arranged a meeting with all three landowners to discuss the community and other benefits on the land and an alternative access from the south. It remains early days but the signs are positive that this can be achieved and we are hopeful that we can deliver on the promises made to residents in 2017/18.

### **Conclusion**

We believe the County Council Highways Department has acted appropriately in raising their objection and the District Councillors acted rationally in overturning their former decision to approve the planning application. Having seen for themselves the parking issues, the very long and narrow streets and the sharp corners larger vehicles would have to negotiate, they concluded correctly in our view, that *'accessing the application site would require navigating the full length of the close which includes a number of bends and junctions. St Andrews Place is not considered suitable as a route for construction vehicle access due to the aforementioned issues'*.

We believe this planning application falls far short of delivering the important parts of MEL20 in the Melton Neighbourhood Plan. We believe that the developer has failed to engage, acknowledge or act on the very real concerns held in the area particularly in terms of access via St Andrews Place, the Health and Safety of the residents of St Andrews Place and biodiversity. We have serious concerns about the viability of large vehicles passing through St Andrews Place indefinitely and the viability of meeting the net biodiversity needed in an area surrounded by SPA and RAMSAR sites. We are concerned about the risk of surface water flooding to certain St Andrews Place neighbours and we are concerned about the effect on wildlife corridors.

We hope that we have been able to demonstrate to you that the District Council's rejection of the application is based on matters which would involve significant highway safety matters and that the Parish Council's opposition to this application is also sound. An alternative is possible and we are committed to delivering that option.

On that basis we would hope you are able to dismiss this appeal.

Should you have any questions or need any further explanation with the facts outlined here, please do not hesitate to get in touch.

Yours

Alan Porter

Chairman, Melton Parish Council



## Appendix A



## Appendix B



Project  
Waterhead Lane, Melton

Client  
Warburg Dawson Partnership

Title  
Site plan - Off-site highways works

Drawing Ref.  
4465-0104

Scale - unless otherwise stated  
SCALE 1:500 @ A1

Revision  
P08

Status  
Issued For  
OPP

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## Appendix C

<http://publicaccessdocuments.eastsuffolk.gov.uk/NorthgatePublicDocs/01590528.pdf>

From: James Meyer

Sent: 17 September 2020 14:37

To: planning

Subject: Application DC/20/1831/OUT

Hi Rachel,

Further to my comments of 19th June

2020 I have read the further

ecological information which

has been provided (Ecological Impact

Assessment (EcIA) (Huckle Ecology,

July 2020)) and I have

the following comments:

Habitats Regulations Assessment (HRA)

Potential impacts arising from the

allocation of this site, including an

element of residential

development, on European designated

sites were assessed as part of the

Habitats Regulations

Assessment (HRA) of the Melton

Neighbourhood Plan (NP). The design

of the outline scheme

appears to fully address one of the

points raised in the NP HRA in

relation to increased

recreational disturbance on the

nearby Deben Estuary SPA and Ramsar

site arising from the

development, namely that there should

be no connection to the public

footpath to the north of

the application site. The second HRA

related requirement of the NP policy

allocating this site,

that the public open space should be

provided between the residential

development and any

access point to the Deben Estuary,

appears to only partially be met as

this application only

covers the northern part of the

allocated site. The application

proposes up to 55 dwellings,

developments of this scale are

expected to include adequate onsite

public open space and

connections to the local Public

Rights of Way network (Annex 1 here:

[https://www.eastsuffolk.gov.uk/assets/](https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigatio)

Planning/Section-106/Habitat-mitigatio

n/Suffolk-CoastRAMS-HRA-Record.pdf), delivered in such a way as to ensure that they do not result in increased recreational pressure on European designated sites (in this case particularly the Deben Estuary SPA and Ramsar site, as well as the nearby Sandlings SPA). Whilst an area of public open space is proposed as part of this development, it is comprised of largely wet habitats unsuitable for recreation. The lack of delivery of the area identified for open space in the NP creates a significant shortfall in the provision of publicly available recreational space and therefore the provision currently proposed is likely to be insufficient to address the requirement to deliver alternative recreational space away from European designated sites. No information to inform a Habitats Regulations Assessment addressing these points is provided in the application, contrary to my comments of 19th June 2020. In addition to the above, the application site is within the Suffolk Coast RAMS Zone of Influence (Zone B – within 13km of the Deben Estuary SPA; Deben Estuary Ramsar Site; the Alde-Ore Estuary SPA; the Alde-Ore Estuary Ramsar Site; the Alde-Ore and Butley Estuaries SAC; the Orfordness-Shingle Street SAC; the Sandlings SPA; the Stour and Orwell Estuaries SPA and the Stour and Orwell Estuaries Ramsar Site) and therefore a financial contribution to the scheme (or equivalent mitigation identified via a Habitats Regulations Assessment (HRA)) is required in order to mitigate in-combination recreational disturbance impacts on habitats sites (European designated sites). This must be secured prior to the application

being determined.

As currently presented I consider that there is insufficient information provided to enable the Local Planning Authority to conclude a favourable HRA of this application as, based on the information available, the scheme as proposed currently appears to contain insufficient mitigation measures to prevent an adverse effect on the integrity of European designated sites. More information on this matter is therefore required. The application cannot be consented until favourable HRA conclusion has been reached and Natural England have been consulted on its outcome.

#### Habitats

The EclA identifies that the site contains a mix of habitats, including wetter habitats (wet woodland, scrub, swamp/fen and drainage ditches) in the southern area which are considered to be of district nature conservation value, habitats assessed as of local (species diverse grassland) and site (tall ruderal, poor semi-improved grassland and bracken) value were also recorded. I consider that the importance assigned to each of the habitat types present is accurate. Whilst the proposed development avoids most of the habitats of district and local importance, the southern most plots (26 to 41 on the Proposed Site Plan drawing ref. 4465-0108 Rev P06) will result in the loss of one of the ditches and an area of marshy grassland, as well as part of an area of scrub. Whilst the EclA identifies mitigation and compensation measures for this, nevertheless, the development will result in the loss of some habitats considered of district/local biodiversity importance. This loss

must be considered against the requirements of Local Plan policy DM27.

#### **Species**

**Bats** – The site has been identified as being of county importance for bats, with habitats of particular value for foraging and commuting present. The majority of these habitats are shown as retained on the outline plans for the site (Proposed Site Plan drawing ref. 4465-0108 Rev

P06), however it is important that this remains the case at the time of any Reserved Matters application. Additionally, it is important that the design of any external lighting protects these habitats, should outline permission be granted the detail of this should form part of any

Reserved Matters application and a condition covering this is suggested below.

**Water Vole** – The EclA states that habitats suitable for water vole are retained within the design of the proposed development. However, Proposed Site Plan drawing ref. 4465-0108 Rev P06

appears to show the northern most ditch lost to the proposed development. This should be clarified and preferably this ditch should be retained in the greenspace on the site, if it is not to be retained this must be justified.

Whilst the 2019 water vole survey recorded the ditch as comprising of sub-optimal habitat for the species, should it be lost a further survey will be required as part of any Reserved Matters application to ensure that this remains the case and that no additional mitigation measures are required.

**Reptiles** – Surveys at the site have recorded 'Low' populations of slow worm, common lizard and grass snake. The retention of most of the habitats suitable for

these species and the implementation of the mitigation measures identified in the EclA should ensure that there is no significant adverse impact on this group. Should permission be granted a condition securing the details of the required reptile mitigation measures is suggested below.

#### **Suggested Conditions**

The matters set out above must be resolved before this application can be considered

favourably, however should this be achieved and planning permission granted I would

recommend that the following conditions are included:

1) Development must be undertaken in accordance with the ecological avoidance, mitigation, compensation and enhancement measures identified within the Ecological Impact

Assessment (EclA) (Huckle Ecology, July 2020) as submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To ensure that ecological receptors are adequately protected and enhanced as part of the development.

2) No removal of hedgerows, trees or shrubs shall take place between 1st March and 31st

August inclusive, unless a competent ecologist has undertaken a careful, detailed check of

vegetation for active birds' nests immediately before the vegetation is cleared and provided

written confirmation that no birds will be harmed and/or that there are appropriate

measures in place to protect nesting bird interest on site. Any such written confirmation

should be submitted to the local planning authority.

Reason: To ensure that nesting birds

are protected.

3) Commensurate with the first Reserved Matters application, a “lighting design strategy for biodiversity” for the development shall be submitted to and approved in writing by the local planning authority. The strategy shall:

a) identify those areas/features on site that are particularly sensitive for biodiversity likely to be impacted by lighting and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and  
b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: To ensure that impacts on ecological receptors from external lighting are prevented.

4) No development shall take place (including any demolition, ground works, site clearance) until a method statement for Reptile Mitigation has been submitted to and

approved in writing by the local planning authority. The content of the method statement shall include the:

- a) purpose and objectives for the proposed works;
- b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
- c) extent and location of proposed works shown on appropriate scale maps and plans;
- d) timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- e) persons responsible for implementing the works;
- f) initial aftercare and long-term maintenance (where relevant);
- g) disposal of any wastes arising from works.

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To ensure that reptiles are adequately protected as part of the development.

5) Commensurate with the first Reserved Matters application a construction environmental management plan (CEMP: Biodiversity) will be submitted to and approved in writing by the local planning authority. No development shall take place (including demolition, ground works, vegetation clearance) until the CEMP (Biodiversity) has been approved. The CEMP (Biodiversity) shall be based on up to date ecological survey information and shall include the following:

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical

measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).

d)The location and timing of sensitive works to avoid harm to biodiversity features.

e)The times during construction when specialist ecologists need to be present on site to oversee works.

f)Responsible persons and lines of communication.

g)The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.

h)Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction

period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To ensure that ecological receptors are adequately protected as part of the development.

6)A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior any occupation of the development. The content of the LEMP shall include the following:

a)Description and evaluation of features to be managed.

b)Ecological trends and constraints on site that might influence management.

c)Aims and objectives of management.

d)Appropriate management options for achieving aims and objectives.

e)Prescriptions for management actions.

f)Preparation of a work schedule (including an annual work plan capable of being

rolled forward over a five-year period).

g)Details of the body or organisation responsible for implementation of the plan.

h)Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.  
Reason: To ensure that the long-term ecological value of the site is maintained and enhanced.

7)Commensurate with the first Reserved Matters application an Ecological Enhancement Strategy, addressing how ecological enhancements will be achieved on site, will be submitted to and approved in writing by the local planning authority. Ecological enhancement measures will be delivered and retained in accordance with the approved Strategy.

Reason: To ensure that the development delivers ecological enhancements.

If you need anything further or want to discuss any of the matters set out above please let me know.

Thanks  
Jame

## Appendix D:

### Extract from MELTON NEIGHBOURHOOD PLAN EXAMINER'S QUESTIONS

**Has an assessment of the Wilford Bridge Road site itself been undertaken to demonstrate that it is capable of development in the form indicated? Concerns have been raised about the landscape quality, trees, habitats, flood risk, loss of flood storage areas, access and impact on traffic on the local road network. Would it be feasible to deliver the community facilities set out in Policy MEL10 within the site? What impact would the development have on these concerns and how would they be mitigated?**

Response:

A detailed assessment of the site has not been undertaken, although many of the issues relating to protection of habitats were addressed through the development of the Habitats Regulations Assessment (December 2016) which was one of the suite of documents submitted at the Regulation 16 Submission Stage (following the conclusions in the HRA screening determination which concluded that further work was necessary – including on the Wilford Bridge Road allocation). In this regard, the HRA and SEA process engaged the statutory bodies – the Environment Agency, Natural England and Historic England – and their responses informed the development of the policy.

Appendix E includes a letter from the site promoter on this issue, pointing out that detailed assessments were undertaken to inform the planning application on the adjacent Riduna Park site which was granted planning permission and has been built.

In respect of the issues raised:

- i. Landscape quality – this is the reason for the retention of the SLA designation and why the proposed layout (see Appendix C restricts development to the less sensitive parts of the site on the western side.
- ii. Habitats – see response above regarding HRA.
- iii. Flood risk – as shown in Appendix C, development is not proposed on the areas of highest flood risk on the eastern part of the site. Uses in these areas are compliant with the NPPF Technical Guidance on Flooding (2012).
- iv. Loss of flood storage areas – a very large ‘flood compensation’ lake is proposed (see Appendix C).
- v. Impact on traffic on the local network – no objection to the allocation has been raised by Suffolk County Council as highways authority, which included addressing the proposed site allocation in meetings with them (see response to Q6). Any detailed matters should be dealt with at planning application stage.

The feasibility of delivering the community facilities on site has been addressed in our response to Q11.

Detailed mitigation of these issues would be dealt with at planning application stage. Included in the appendix is a masterplan for the site that was presented during neighbourhood plan consultation between 10<sup>th</sup> and 12<sup>th</sup> March 2016.

## Appendix E: Letter from promoter of Wilford Bridge Road allocation



Cllr Buffy Barrington  
Melton Parish Council

9 June 2017

Dear Cllr Buffy Barrington

Further to your recent email regarding the questions raised by the Independent Inspector we would like to make the following comments :

We have carried out extensive negotiations to secure the adjoining landowners and to be able to ensure this is not a false promise and we can deliver a comprehensive development of the site as proposed in the Melton NP.

This extensive process has involved entering into formal agreements with Colin and Edward Carter for the commercial haulage site, Bill Warburg for the residential land and Barrie Emerson for the access through his site. All of these agreements are in place.

This site offers an extraordinary opportunity to create something very special, however the successful viability of the development requires the comprehensive development of all the elements together commercial , community and residential.

This is a rare chance to create a self sustainable community and we can deliver this in the same way as we are currently developing the adjoining 6 acre Riduna Park and we have already successfully developed at the Masterlord Office Village in Ipswich , Brightwell Barns at Brightwell , and Clopton Park Clopton.

We have created three entire business communities each with its own independent identity and a true mixture of accommodation ranging from fully serviced desks to independent offices right up to headquarter style buildings and everything in between . Our sites are home to over 500 businesses employing over 2000 people all enjoying our concept of Office Living .

We would welcome the Independent Inspector to visit these developments and form her own opinion.

The relocation of SCDC offices has been the catalyst for this development and such is the demand that first 6 units have been sold off plan and we have now signed contracts for the construction of the next 9 units each of 2500 sq ft with the contractors starting this month .

Rents and sale prices are setting new market levels confirming the demand .

The Independent Inspector has raised the question of the practical feasibility in terms of the wildlife, environmental issues, highways and flood risk amongst others. Having been involved in the development of the Riduna Park for the last 8 years we have gone through all of these issues in detail to bring that site to fruition so we do fully understand the difficulties to be overcome .

We are confident that we have the solution to most of the technical problems and will be able to deliver this site in its entirety if the Melton NP is approved and we are given the opportunity.

It would be our intention to submit a detailed planning consent for the comprehensive development as soon as the Melton NP is approved, on the basis of a phased development having first constructed

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the flood mitigation lake and community areas .

It is difficult to reply in enough depth to give the necessary level of comfort that we feel the Inspector is seeking but we are a local firm of developers with a proven track record in delivering these unique business communities and we would be pleased to meet with the Inspector and answer directly any questions that she may have .

Kind regards  
Chris Dawson



Yours sincerely,

C H Dawson

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