

MID SUFFOLK DISTRICT COUNCIL  
DEVELOPMENT CONTROL COMMITTEE - 09 September 2015

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<b>AGENDA ITEM NO</b>	3
<b>APPLICATION NO</b>	2396/15
<b>PROPOSAL</b>	Erection of two storey dwelling with parking and access to Rose Lane, following demolition of Wesley Hall
<b>SITE LOCATION</b>	Wesley Hall, Rose Lane (Rear of Elmswell Methodist Church) Elmswell
<b>SITE AREA (Ha)</b>	0.039
<b>APPLICANT</b>	The Trustees of Elmswell Methodist Church
<b>RECEIVED</b>	July 7, 2015
<b>EXPIRY DATE</b>	September 12, 2015

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#### **REASONS FOR REFERENCE TO COMMITTEE**

The application is referred to committee for the following reason :

- (1) The Head of Economy considers the application to be of a controversial nature having regard to the extent and planning substance of comments received from third parties.
- (2) A Member of the Council has requested that the application is determined by the appropriate committee and the request has been made in accordance with the Planning Code of Practice adopted by the Council. The Members reasoning is included in the agenda bundle.

#### **PRE-APPLICATION ADVICE**

1. The agent visited the Duty Officer and the development of the whole Methodist Church site was discussed. Advice was given that any application submitted should ensure adequate car parking, and include Heritage and Community use statements.

#### **SITE AND SURROUNDINGS**

2. The application site fronts Rose Lane, an unmade, pot-holed lane which is also a public footpath. The site is fenced onto Rose Lane with no existing vehicular access to the lane.

The site contains the Wesley Hall which is a single storey red brick 20th century building accessed through the Methodist Church land which fronts School Road. The Wesley Hall is owned by the Methodist Church and serves as a community building.

To the south of the site lies an area of garden land with a bungalow positioned beyond to the south. To the north is a building plot with planning permission for a two storey house ( 0118/12), with a bungalow beyond.

The Railway Tavern is located to the west of the church but the rear wall of the Wesley Hall forms the boundary with the pub garden.

Adjacent to the Wesley Hall is the Methodist Church, and the Exchange Hall and all three buildings have been listed by the District Council as Assets of Community Value.

### HISTORY

3. The planning history relevant to the application site is:

None

### PROPOSAL

4. To demolish the Wesley Hall which currently occupies the site and erect a two storey, four bedroom dwelling with parking and turning area and new vehicular access to Rose Lane.

The proposed dwelling has gables expressed on the front (south east) and rear (north west) elevations which each have a bedroom window in them. Two dormers serving bedroom 3 and a bathroom are shown on the front elevation, whilst a single dormer on the rear elevation serves bedroom 4. The south west gable is blank at first floor level whilst the north east elevation has an obscure glazed window at first floor serving an en-suite shower room.

The proposed materials are blue/black artificial slates, colourwashed render over a buff facing brick plinth, and white upvc windows and doors.

The ridge height to the proposed dwelling is given as 7.0m.

Boundary treatment shows the existing close boarded fence being retained on the south west boundary, and new 1.8m high close board fencing to the northern boundaries.

A new vehicular access to Rose Lane is proposed with a block paving parking and turning area.

### POLICY

5. **Planning Policy Guidance**

See Appendix below.

## CONSULTATIONS

### 6. **Suffolk County Council Highways.** Reply received :18/08/15

Whilst Suffolk County Council Development Management does not have any direct highway safety concerns please be aware that there are uncertainties over whether the applicant has private vehicular rights to use Public Footpath 17 for vehicular access, as highlighted by Suffolk County Council Public Rights of Way

Recommend conditions relating to visibility splays, laying out access and provision of manoeuvring and parking of vehicles.

### **Suffolk County Council Rights of Way.** Reply received :17/08/15

Government guidance considers that the effect of development on a public right of way is a material consideration (Rights of Way Circular 1/09 – Defra October 2009, paragraph 7.2) and that public rights of way and access should be protected.

Public Footpath 17 is recorded along Rose Lane, the proposed access to the development area.

The Rights of Way and Access Team therefore **objects** to the proposal as submitted on the basis that:

There are uncertainties over whether the applicant has private vehicular rights to use Public Footpath 17 for vehicular access.

The applicant must have private rights to take motorised vehicles over the public right of way. Without lawful authority it is an offence under the Road Traffic Act 1988 to take a motorised vehicle over a public right of way other than a byway.

### **MSDC Environmental Health (Land contamination).** Reply received : 04/08/15

No cause for concern regarding contamination. Request to be contacted in the event of unexpected ground conditions being encountered. Developer is responsible for safe development of the site.

### **MSDC Heritage.** Reply received : 24/08/15

1. The Heritage Team considers that the proposal would cause no harm to heritage assets because it would not adversely affect nearby historic buildings or their setting.
2. The Heritage Team recommends approval with appropriate conditions.

The Methodist Church at Elmswell is an attractive building of 1898-1904 by Eade and Johns of Ipswich. Its boldly decorated brickwork makes a strong contribution to the streetscape locally, and relates well to the 1800s brick houses of the village. Although falling short of the very strict criteria for listing

buildings of this date, the building should be treated as an undesignated heritage asset.

The building to be removed is a plain, utilitarian block of the mid-1900s with no particular merit, but playing the role of understated context for the chapel, and broadly matching its red brickwork.

There is no reason to seek retention of the hall, and no reason to object to the proposed dwelling, which is situated so as not to intrude in the main views of the Church. The proposed boundary treatment adjacent to the Church should be carefully handled.

The plans show close-boarded fencing on the boundary between the Church and the eastern outbuilding. This would be a poor quality material. I would suggest that a red brick wall would better complement the Church building, and would maintain the integrity of the site.

**MSDC Communities.** Reply received: 18/08/15

I would like to raise the following policies and ask that these are taken into consideration when determining the application.

1. NPPF

Section 8 Promoting Healthy Communities

70. To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: • plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments; • guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs; • ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and • ensure an integrated approach to considering the location of housing, economic uses and community facilities and services

Section 3. Supporting a prosperous rural economy

28..... To promote a strong rural economy, local and neighbourhood plans should: ..... • promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship

2. The Councils Supplementary Planning Guidance - Retention of Shops, Post Offices and Public Houses in Villages (Adopted February 2004)

makes reference to the retention of key community facilities – so it would seem appropriate to expect the same safeguards that it applies to the loss of Shops, POs and pubs to be applied to this application.

Alternative Facilities – whilst alternative facilities are highlighted in the application there is no information to confirm that the needs of the current users of the Wesley Hall can be met in these other locations. Is the location, size and cost of these facilities suitable, and are they available at the appropriate times. For a community the size of Elmswell a range of community facilities seems a reasonable situation.

Marketing – it appears that a marketing campaign has not been undertaken – if this requirement is made it would identify whether there was an interest in retaining the facility in its current form, or indeed in alternative forms. Any marketing of the site needs to be agreed with the council and the asking price should be based on a valuation of the site in its current form, not with hope value. This requirement aligns with applications made for changes of use for commercial/retail/pubs/shops etc. To date the community has not been given the opportunity to purchase the site, but groups locally are actively pursuing Projects to seek funding to secure the site.

Community Support – I'm aware that a number of individuals, groups, and the parish council are concerned about the loss of this community facility and are making their own representations.

3. Asset of Community Value – I can confirm that the property is listed as an ACV

which demonstrates that the property is valued as a Community Asset. As yet the owner has not issued any notice of intention to dispose of the property so the moratorium provisions have not been triggered. The impact that a change of use application will have on the community's ability to purchase the property will be significant – ie if residential use is granted, not only does it allow for the demolition of the building and so the halls will be lost, but the site will gain an increase in value which is likely to put it beyond the means of the local community. Also the fact the site is now divided into two parcels of land, will further impact on the community's ability to secure the site, by increasing the overall value, as the two parcels will each potentially have a much increased value, and there is a risk that the community may not be able to secure both parcels of land. I would like to request that the status of being Listed as an ACV be regarded as a material consideration and be given weight in the decision making process. I can confirm that the listing applies to the whole site, and will impact on either parcel of land should they be disposed of.

**Elmswell Parish Council.** Reply received :19/08/15

Councillors object to this Proposal for the following reasons:

1. NPPF para. 28. The Government's NPPF guidance seeks to promote the retention and development of local services and community facilities in villages including, specifically, 'meeting places'. The Wesley Hall is a well used, viable and widely supported meeting place providing a convenient, fully functioning and attractive facility serving a broad range of community uses. To demolish it would run entirely counter to this policy.

2. NPPF para 70. In 'Promoting healthy communities', the NPPF looks to deliver social recreational and cultural facilities and to service the community's needs by virtue of planning policies and decisions which:

plan positively for the provision and use of shared space, community facilities and meeting spaces;

enhance the sustainability of communities and residential environments;

guard against the unnecessary loss of valued facilities;

ensure that established facilities are retained for the benefit of the community:

ensure an integrated approach to considering the location of...community facilities and services.

The Wesley Hall is a much-shared space that adds greatly to the community life and cohesion of Elmswell. It is viable and sustainable. It is situated south of the railway line providing an invaluable community asset to less mobile members of the community who cannot easily travel to the community complex at Blackbourne half a mile over the railway crossing. Its loss would be unnecessary. The effects of that loss, by demolition of the venue, on the many established users and on potential user groups would be widely felt and seriously retrograde.

3. Core Strategy para 1.52. MSDC's Core Strategy states that the provision of key services needs to keep pace as the population grows. This includes leisure and community centres. The Wesley Hall is just such a key service and the population of Elmswell is set to grow - immediately by up to 190 new dwellings on the redundant Bacon Factory site and, as a CS3 village, well beyond that. The Wesley Hall must be retained as an integral part of the general community provision.

4. Core Strategy para 1.54. It is clearly stated in the District Core Strategy that the provision of opportunities, activities and facilities for people to enjoy their leisure time is vital for Mid Suffolk's community well being. This proposal seeks to demolish a prime central community facility which exactly fulfils this role.

5. SPG 2004 paras 2.1, 2.2. The MSDC Supplementary Planning Guidance adopted in February 2004 states that, 'the loss of any village service or facility is a source of concern', and, consequently, has as objectives:

to encourage the retention of rural services;

to ensure that proposals for change of use are properly justified.

The Wesley Hall provides just such a service. The proposal to dramatically change its use by brutally and summarily ending that use runs entirely counter to these objectives.

6. NPPF para 75 Local Plan Policies RT12 & T10. The proposed access is on to Rose Lane, an unadopted single-track road accessing some 11 dwellings. It forms part of the Right of Way network as Elmswell footpath 17 which serves as a well-used through route for pedestrians including those wishing to walk to and from the sheltered accommodation at Hanover Court. The traffic generated by another 4 bedroomed family home would be detrimental to the safety of users of this footpath which is already considered hazardous.

7. Local Plan policies GP1, H13, & H15. The effect of a modern 2 storey 4 bedroomed property in the context of the pleasing small scale mixed housing stock that is Rose Lane would present a building mass of a scale and density at odds with the street scene, inconsistent with the pattern and form of development of the neighbouring properties and much to their detriment.

8. Mid Suffolk ACV listing. This site is registered as an Asset of Community Value with effect from 10.12.14. This value is predicated upon the existing community use of the Wesley Hall which represents a key element of the recreational, educational, cultural and social life of a fast growing community. With a few exceptions, the many activities which are hosted in this venue cannot

be relocated elsewhere and this proposal, therefore, seeks to destroy a vital village resource which enjoys broad community support, is viable and is growing.

The 2012 Community Value Regulations exist to address exactly this situation. They should be relied upon and, by virtue of that reliance, the proposal to demolish the Wesley Hall should fail.

## **LOCAL AND THIRD PARTY REPRESENTATIONS**

7. This is a summary of the representations received.
- The hall is extremely well used by all sections of the community for clubs and meetings and as a Polling Station. There are 20 regular hirers and the Centre is viable and sustainable.
  - Elmswell is a large village, growing with the development at the old bacon factory. All these additional houses will put more pressure on the existing village facilities.
  - Wesley Hall provides facilities for many people who would find it difficult to get to the Blackbourne which is on the north side of the railway line. The level crossing is shut a minimum of 3 times an hour and there is no pedestrian bridge.
  - Facilities at The Blackbourne are stretched already and would be unable to cope with expansion. It is not an alternative venue. The Baptist Chapel and Library are not viable options for alternative use.
  - The Wesley Hall must remain as a much needed venue under local control.
  - Other venues do not have the facilities, including an enclosed garden, staging, natural light and storage which other venues have. Facilities have recently been updated. Other options are too big, too expensive, have poor access and/or are incompatible with those who use the Wesley Centre.
  - There is ample new housing in the village, but there is a need for a central location for meetings and clubs. The Planning Authority should give balance to the village and keep the site for community use.
  - A collaborative project between the Elmswell Wesley Centre User Group and the Parish Council is being progressed to retain the centre for development and long-term community use. It has a future as a vibrant community hub in public ownership to enhance the cultural, leisure and health needs of residents. User Group point out that the applicant wrote to the Parish Council recently that the hall is viable, successful and essential and should not be demolished.
  - Government and Local Government Regulations state that community facilities which contribute to well-being should be safeguarded. Section 8 of the NPPF states that planning decisions should plan positively for community facilities, guarding against their loss and ensuring their development, modernisation and retention for the benefits of the community.
  - Section 3 of the NPPF supports a prosperous Rural Economy. The application is not consistent with this.
  - Section 12 of the NPPF relates to Conserving and Enhancing the Historic Environment. The Methodist Chapel is identified in the Design and Access Statement as a Heritage Asset and the demolition of the Wesley Hall which is physically linked and shares facilities such as access there would be an adverse impact on the Chapel and the immediate environment.
  - The MSDC Supplementary Planning Guidance - Retention of Shops, Post Offices and Public Houses in villages does not explicitly provide for

community centres but should reasonably be accorded the same safeguards and protection.

- The Wesley Hall was registered as an Asset of Community Value in 2014. No intention to dispose of the asset has been issued. A change to residential would inevitably increase the monetary value of the site, being likely to put the Centre beyond the ability of the village to raise funds to purchase it for long-term community use.
- A recent Parish Poll demonstrated clear community support for retention of the buildings.
- The proposed access is along an unmade track which also includes a well used designated footpath. The extra traffic generated by this proposal and the building of the house approved on the adjacent site will make an already hazardous footpath even more so.
- Noise pollution from building works.
- Further traffic and equipment/deliveries associated with the building will change the character of the lane.
- There should be sufficient parking for the large house.
- Rose Lane is unmade and water accumulates in the many puddles. Paved parking areas, sloping towards the house will make the flooding problem worse, with possible ingress into adjacent cottages.
- The developer/owner should resurface the road from the entrance to the lane to the dwelling, so that any damage from plant is repaired to a high standard.
- Deeds should include sharing responsibility for maintenance of the lane and drainage/services.
- The proposed four bedroom house is set among bungalows and small rural cottages and is not 'in keeping' with its surroundings.
- Neighbouring properties will be overshadowed and overlooked with loss of privacy. Street scene will be adversely affected.
- The site is next to a Public House, near the fish and chip shop, Chinese Take away and Fire/Police Station and has an open appearance.

In support of the application the following comments are made :

- The sale of the lane would enable the Chapel and most of the amenity attached to the Chapel to remain.

A neutral comment has been made that the erection of the dwelling will have no long term effect on the outlook of a nearby property as it will replace an existing building.

## **ASSESSMENT**

8. There are a number of considerations to be addressed :

- Principle of development
- Highway and Access Issues
- Design and Layout
- Residential Amenity
- Ecology
- Heritage Issues

- Principle of development

The site lies within the village of Elmswell which is identified in Policy CS1 of the Core Strategy Document (2008) and Core Strategy Focused Review (2012) as a Key Service Centre where the majority of new development will be directed.

Policy CS5 provides that *"All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area"*.

The Core Strategy Focused Review (CSFR) was adopted by Full Council on 20 December 2012 and should be read as a supplement to Mid Suffolk's adopted Core Strategy (2008). This document updates some of the policies of the 2008 Core Strategy. The document does introduce new policy considerations, including Policy FC 1 - Presumption in favour of sustainable development that refers to the National Planning Policy Framework (NPPF) objectives and Policy FC 1.1 - Mid Suffolk approach to delivering Sustainable Development that provides *"development proposals will be required to demonstrate the principles of sustainable development and will be assessed against the presumption in favour of sustainable development as interpreted and applied locally to the Mid Suffolk context through the policies and proposals of the Mid Suffolk new style Local Plan. Proposals for development must conserve and enhance the local character of the different parts of the district. They should demonstrate how the proposal addresses the context and key issues of the district and contributes to meeting the objectives and the policies of the Mid Suffolk Core Strategy and other relevant documents."*

With regard to the NPPF the Council acknowledges that it is unable to demonstrate a five-year supply of deliverable housing land, as required by paragraph 47 of the Framework. Therefore, in accordance with paragraph 49 of the Framework, the proposal should be considered in the context of the presumption in favour of sustainable development. For the purposes of decision taking, that means granting planning permission unless the adverse effects of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework, taken as a whole.

The NPPF also states in Section 3 'Supporting a prosperous rural economy, Paragraph 28 that:

*'To promote a strong rural economy, local and neighbourhood plans should: ...*

- *Promote the retention and development of local services and community facilities in villages, such as shops, meeting places, sports venues, cultural buildings, public houses and places of worship.'*

Whilst there is the presumption in favour of sustainable development and a lack of a 5 year land supply, the minimal gain to the housing provision should be weighed carefully against the potential loss of a community asset.

Section 8 'Promoting healthy communities' is relevant. Paragraph 69 states that *'...planning decisions should aim to promote opportunities for meetings between members of the community who might not otherwise come into contact with each other,...*' paragraph 70 states that planning decisions should *'guard against*

*the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.'*

Supplementary Planning Guidance – Retention of Shops, Post Offices and Public Houses in Villages (Adopted February 2004) sets out the Council's position with specific regard to the conversion of pubs to dwellings. This states that there will be '*...support for the retention of facilities, where they can be shown to be viable...*'.

Although this Guidance does not specifically relate to community halls the principles relating to the retention of important community facilities still apply. Particular consideration is given in instances where an application relates to the last available facility in the village.

The Localism Act 2011 provides for nomination by Parish Councils or community groups to nominate 'Assets of Community Value' If accepted the nomination gives the group time to bid for an asset if the owner decides to dispose of it. The list is maintained by the Local Authority.

The 'Assets of Community Value - Policy Statement' 2011 states that the fact that a site is listed may affect planning decisions and it is open to the Local Planning Authority to decide that listing is a material consideration if an application is submitted, considering all the circumstances of the case.

The Wesley Hall, the Methodist Church and the Exchange Hall have all been listed as Assets of Community Value. They are all within the ownership of the Methodist Church and are accessed off School Road where parking provision is made.

In this case the Design and Access Statement submitted in support of the application identifies that the Wesley Hall continues to be available to regular users, is managed by committee and maintained by the Church. The Church needs to seek alternative uses for the site and/or buildings. The Statement identifies regular users of the Wesley Hall and the Exchange Hall , as well as identifying alternative venues in Elmswell.

The Wesley Hall is not the last community facility in Elmswell. Correspondence and letters of representation have identified the extent of use and value which is accorded to the facility. The Church and the Exchange Hall do not form part of this application and are available for community use. Other facilities in Elmswell have been listed by the agent and objectors. These have included 4 halls of varying sizes at the Blackbourne Centre, The Baptist Church Hall and the Public Library.

The loss of the Wesley Hall would reduce the range of community facilities available, particularly in the area south of the railway line. The use of the application site currently operates in association with the wider area occupied by the Church and the Exchange Hall where parking provision is found. The operation of the whole site is linked and should be considered comprehensively. In the light of guidance contained in the NPPF regarding the promotion of healthy communities the Local Planning Authority regards the loss of this hall as a material consideration and which would cause harm to the vitality of the locality.

### Highway and Access Issues

The site is accessed off an unmade, private lane. Comments received from Suffolk County Council Highways and Rights of Way have raised the question of the applicant's rights to use Public Footpath 17. This is a consideration separate from planning considerations.

Highways do not have direct highway safety concerns but have recommended conditions relating to visibility from the site, the layout of the new access and provision of parking and manoeuvring space. The required visibility splay appears to encroach over land outside the applicant's control and is unlikely to be achieved. An amended visibility splay requirement in relation to pedestrian safety is awaited from SCC Highways and an update will be presented to committee. The Highway Authority is usually concerned with proposals where they meet the public highway and in this case they have not commented on the junction with School Road and the capacity of the lane to accommodate additional traffic. The proposal indicates parking space for two vehicles which is one less space than normally required for a four bedroom property. Properties in Rose Lane generally do not have turning space on site and so this is an advantage.

### Design and Layout

The design of the proposed dwelling is fairly standard and would not be out of character with other properties in Elmswell. The proposal does not represent overdevelopment of the site and has an acceptable level of private amenity space and parking provision, although it is of a larger scale than other properties in Rose Lane.

The half hip to the south west gable is not particularly characteristic of the locality but the design overall does not give rise to concern sufficient to warrant refusal.

### Residential Amenity

The size of the proposed dwelling on the site gives adequate private amenity space for future occupiers.

The property has been designed so that there are no overlooking issues from first floor windows in the side elevations. Bedroom windows in the rear elevation overlook the rear part of the site, with a pub garden beyond. No issues of overlooking or impact on neighbour amenity arise from the proposal.

### Ecology

There are no issues relating to protected species.

### Heritage Issues

The site lies adjacent to the non-designated Heritage Asset which is the Methodist Church. The Heritage Officer does not consider that the proposal will harm nearby historic buildings or their setting. However the boundary treatment of the application site where it abuts the Methodist Church requires more careful

treatment than the close boarded fence which is proposed. A red brick wall would be a more appropriate boundary treatment where it abuts the church and this could be dealt with by way of condition should the application be approved.

### Conclusion

This application seeks permission to demolish an Asset of Community Value, the retention of which has received a significant level of support. Whilst alternative community facilities are available in the village overall the application has not satisfactorily demonstrated that the Wesley Hall should not be retained as a viable asset to the community supporting the achievement of sustainable development through the wider social role performed through the planning system as required by paragraphs 7, 28 and 70 of the NPPF and Policies FC1 and FC1.1 of the Core Strategy Focused Review.

### RECOMMENDATION

**That Full Planning Permission be refused for the following reasons:**

The Wesley Hall has been designated as an Asset of Community Value for which significant community support has been demonstrated. The loss of the community hall would be harmful to the provision of community facilities affecting the vitality of the locality to the detriment of sustainable development with particular regard to the social role performed by the planning system.

On that basis the proposal is contrary to paragraphs 7,28 and 70 of the National Planning Policy Framework that seek to guard against the unnecessary loss of valued facilities and promotes the retention of such uses, and Policies FC1 and FC1.1 of the Core Strategy Focused Review which translates the guidance contained in the NPPF to local circumstances in seeking to deliver Sustainable Development.

Philip Isbell  
Corporate Manager - Development Management

Sian Bunbury  
Planning Officer

### APPENDIX A - PLANNING POLICIES

#### **1. Mid Suffolk Core Strategy Development Plan Document and the Core Strategy Focused Review**

**Cor1** - CS1 Settlement Hierarchy

**Cor5** - CS5 Mid Suffolks Environment

**CSFR-FC1** - PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT

**CSFR-FC1.1** - MID SUFFOLK APPROACH TO DELIVERING SUSTAINABLE DEVELOPMENT

#### **2. Mid Suffolk Local Plan**

**H13** - DESIGN AND LAYOUT OF HOUSING DEVELOPMENT

**RT12** - FOOTPATHS AND BRIDLEWAYS

**GP1** - DESIGN AND LAYOUT OF DEVELOPMENT

- H15 - DEVELOPMENT TO REFLECT LOCAL CHARACTERISTICS
- H16 - PROTECTING EXISTING RESIDENTIAL AMENITY
- H17 - KEEPING RESIDENTIAL DEVELOPMENT AWAY FROM POLLUTION
- T10 - HIGHWAY CONSIDERATIONS IN DEVELOPMENT

3. **Planning Policy Statements, Circulars & Other policy**

NPPF - National Planning Policy Framework

**APPENDIX B - NEIGHBOUR REPRESENTATIONS**

Letters of representation have been received from a total of **19** interested parties.

The following people **objected** to the application

[Redacted list of names]

The following people **supported** the application:

The following people **commented** on the application:

[Redacted list of names]