

Committee Report

Item No: 7A

Reference: DC/21/01457

Case Officer: Jasmine Whyard

Ward: Claydon & Barham.

Ward Member/s: Cllr Timothy Passmore. Cllr John Whitehead.

RECOMMENDATION – APPROVE RESERVED MATTERS

Description of Development

Submission of details under Reserved Matters following Outline Planning Permission 0085/17 - Appearance, Scale, Layout and Landscaping for the erection of 20.no dwellings (including 7 affordable)

Location

Land North of Pesthouse Lane, Barham, Suffolk

Expiry Date: 20/01/2023

Application Type: RES - Reserved Matters

Development Type: Major Small Scale - Dwellings

Applicant: Foregain Ltd

Agent: KLH Architects

Parish: Barham

Site Area: 1.04 hectares

Density of Development:

Gross Density (Total Site): 19.2 dwellings per hectare

Details of Previous Committee / Resolutions and any member site visit: Outline Planning Application 0085/17 was approved by Members on the 13/03/2019, permission was subsequently granted 13/09/2019

Has a Committee Call In request been received from a Council Member: No

Has the application been subject to Pre-Application Advice: No

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

- i. The proposal is for a development for '15 or more dwellings' and as such it exceeds the threshold for being determined under delegated authority as set out under the Council's Planning Charter and Protocol for the use of Delegation.

CLASSIFICATION: Official

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

The Development Plan

The following policies are considered the most important to the determination of this proposal. The policies are all contained within the adopted development plan for Mid Suffolk District which is comprised of: Mid Suffolk Core Strategy Focused Review (2012), Mid Suffolk Core Strategy (2008) and saved policies from the Mid Suffolk Local Plan (1998). All policies, save for CS1, CS2 and H7, are afforded full weight in the determination process as they are, *inter alia*, considered wholly consistent with the policies of the NPPF (having regard to paragraph 219 of that document).

- **Mid Suffolk Core Strategy Focused Review (2012)**

- FC1- Presumption in Favour of Sustainable Development
 - FC1.1- Mid Suffolk Approach to Delivering Sustainable Development

- **Mid Suffolk Core Strategy (2008)**

- CS3- Reduce Contributions to Climate Change
 - CS4- Adapting to Climate Change
 - CS5- Mid Suffolk's Environment
 - CS6- Services and Infrastructure
 - CS9- Density and Mix

- **Mid Suffolk Local Plan (1998)**

- GP1- Design and Layout of Development
 - H13- Design and Layout of Housing Development
 - H14- A Range of House Types to Meet Different Accommodation Needs
 - H15- Development to Reflect Local Characteristics
 - H16- Protecting Existing Residential Amenity
 - H17- Keeping Residential Development Away from Pollution
 - CL8- Protecting Wildlife Habitats
 - T9- Parking Standards
 - T10- Highway Considerations in Development

Neighbourhood Plan Status

This application site is not within an area either designated for, nor with an adopted neighbourhood plan.

Consultations and Representations

During the course of the application Consultation and Representations from third parties have been received. These are summarised below.

A: Summary of Consultations

Town/Parish Council

No comments were received from Barham Parish Council nor from Claydon and Whitton Parish Council.

National Consultee

- **Anglian Water**
No comment.
- **Disability Forum**
Make comments on the following 1) Note that dwellings will have level thresholds and easy circulation, 2) a bungalow is proposed, 3) 50% of dwellings should meet Part M4(2) and 1 should at least meet Part M4(3) of Building Regulations, 4) all footpaths should be wide enough and appropriately surfaced for wheelchair users.
- **East Suffolk Drainage Board**
No objection, list a range of details on the Board's regulatory regime and consenting process.
- **Historic England**
No comment to make.
- **National Highways**
No objection.
- **Suffolk Wildlife Trust**
Make comments on the following 1) the eastern hedgerow boundary should be retained, 2) a wildlife sensitive lighting scheme should be provided, 3) swift nest bricks should be incorporated into two-storey buildings and 4) gaps in boundaries should be retained for hedgehogs

County Council Responses

- **Archaeology**
No objection.
- **Development Contributions**
No objection. A S106 Agreement was signed as part of the Outline Permission. Other infrastructure matters will be covered by CIL.
- **Fire and Rescue**
No objection.
- **Floods and Water**

Object on the basis that there is uncertainty about the proposed location of the dwellings on the site and whether they will remain safe for the lifetime of development and will not increase flood risk elsewhere. Note that the LPA is minded to recommend approval.

- Whilst the applicant has provided modelling and proposed a deep compensational storage area, the LLFA still feel that they cannot guarantee that the properties will remain safe for the lifetime and will not increase flood risk elsewhere. However, due to an update to the national predicted surface water flood maps, the flood risk has decreased.
- The LLFA will not be able to approve this application as we feel the risk of flooding (existing and future) cannot be proven. We will however provide technical assistance regarding a surface water drainage strategy once detailed information comes forth.
- The LLFA would also like to advise the LPA that the site is at risk of groundwater flooding as per the BMSDC Strategic Flood Risk Assessment (SFRA), therefore we would advise that the LPA/Applicant monitors the ground water monitoring prior to the site being developed.
- The LLFA believe that the site does not meet the policy requirement below

1. National Planning Policy Framework (2021) Paragraph 159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

2. Mid Suffolk District Council's Core Strategy Policy CS4 Flood Risk: The council will support development proposals that avoid areas of current and future flood risk, and which do not increase flooding elsewhere, adopting the precautionary principle to development proposals.

3. The Suffolk Flood Risk Management Strategy 2016 Paragraph 2.5 - Planning authorities should only approve development where it can be demonstrated that the proposal satisfies all the following criteria:

- a. it does not increase the overall risk of all forms of flooding in the area through the layout and form of the development and use of appropriate SuDs
 - b. it will be adequately protected from flooding.
 - c. it is and will remain safe for people for the lifetime of the development.
- The LLFA nonetheless recommends a planning condition securing a surface water drainage and flood compensational storage area verification report.

Officer Comment: *These particular flood risk issues will be addressed within the body of the report as the Council has sought external independent flood risk advice.*

- **Highways**

No objection subject to conditions on 1) bin presentation and storage areas, 2) parking provision provided and retained and 3) details of EV charging points.

- **Travel Plan**

No comment to make.

Internal Consultee Responses

- **Environmental Health- Air Quality**

No comments to make.

- **Environmental Health- Land Contamination**

No comments to make.

- **Environmental Health- Noise, Odour, Light and Smoke**
No objection.
- **Heritage**
No comment to make.
- **Place Services- Ecology**
No objection subject to conditions on 1) additional landscaping information and 2) wildlife sensitive lighting scheme.
- **Place Services- Landscape**
Additional information should be submitted in regard to the landscaping scheme, details of which can be secured via conditions on 1) arboricultural method statement, 2) hard and soft landscaping scheme, 3) landscape management plan.
- **Public Realm**
No comment.
- **Strategic Housing**
No objection, the affordable housing provision is in line with the S106 Agreement.
- **Sustainability**
No objection but recommends condition for the submission of a Sustainability and Energy Statement.
- **Waste Services**
No objection.

B: Representations

At the time of writing this report no representations were received. A verbal update shall be provided as necessary.

PLANNING HISTORY

REF: 0085/17	Erection of 20 dwellings including 7 affordable homes (with appearance, landscaping layout and scale forming Reserved Matters) (resubmission of application 2113/16).	DECISION: GTD 29.11.2019
REF: 2113/16	Erection of 27 dwellings including 9 affordable homes (following demolition of existing buildings)	DECISION: WDN 18.07.2016

PART THREE – ASSESSMENT OF APPLICATION

1. The Site and Surroundings

- 1.1. The site extends 1.04 hectares and comprises of a scattering of redundant outbuildings. There are dwellings located north along The Crescent, east along Norwich Road and south also along Pesthouse Lane. The A14 runs along the western boundary of the site. The dwellings surroundings the site adopt a mixed vernacular.
- 1.2. There are footways to the southern and eastern boundaries of the site. There are Public Rights of Way (footpaths) running along the southern and western boundaries of the site. The nearest bus stop is located along Norwich Road next to but outside of the site in the northeast corner. The bus stop has routes 113 and 114, which are relatively regular services Mondays to Friday reducing on Saturdays, connecting the site to Ipswich, villages along the A140 and Eye.
- 1.3. The southern, eastern and western edges of the site are lined by trees and hedgerows, none of which are protected by Tree Preservation Order. The site is not within or near to any SSSI or designated landscape (for example Special Landscape Area or Area of Outstanding Natural Beauty).
- 1.4. The site is not within nor adjacent to any Conservation Area. There are no immediately adjacent listed buildings, with the nearest located north approximately 235 metres (Grade II listed Sorrel Horse Inn and Barham Lodge). The site is not considered to fall within the setting of these listed buildings.
- 1.5. The site falls wholly within Flood Zone 1 and is therefore at a very low risk of fluvial (river) flooding. The site is however at risk of pluvial (surface water) flooding, this risk ranges from low to high. Whilst pluvial flood risk is primarily concentrated within the western part of the site, there are pockets of pluvial flood risk in the eastern area of the site.

2. The Proposal

- 2.1. The proposed development is for the erection of 20 dwellings (including 7 affordable units). The proposed housing mix would consist of the following:
 - 4 x 1-bedrooms (all two-storey dwellings)
 - 2 x 2-bedrooms (both two-storey dwellings)
 - 9 x 3-bedrooms (eight two-storey dwellings, one bungalow)
 - 5 x 4 bedrooms (all two-storey dwellings)
- 2.2. The 'reserved matters' being considered under this application are appearance, scale, landscaping and layout. The access was considered and approved under the Outline Permission and therefore the access into the site is not a matter for consideration under this application as it is as previously approved.
- 2.3. For ease of reference a range of conditions were imposed on the outline permission as summarised below [these are therefore not recommended to be repeated under these reserved matters]:

- Commencement time limit (3 years to submit reserved matters and 2 years to commence)
- Reserved matters must be approved
- Development carried out in accordance with approved plans
- Prior to commencement a phasing scheme must be submitted
- Prior to commencement of development additional flood information must be submitted
- Any unexpected land contamination to be dealt with.
- Prior to commencement a noise assessment for protecting dwellings from traffic noise must be submitted
- Access gradient shall not be steeper than 1 in 25
- Prior to commencement details of estate roads and footpaths to be submitted
- No dwelling shall be occupied until carriageways and footways serving it have been constructed to Binder course level
- Prior to commencement parking and manoeuvring details shall be submitted
- Visibility splays to be provided in full
- Prior to commencement a written scheme of investigation (archaeology) shall be submitted
- Prior to occupation a post investigation (archaeology) shall be submitted
- All garages shall solely be used for parking and incidental storage (no conversion)
- Prior to commencement details of fire hydrants to be submitted
- All ecological measures within ecology report to be complied with
- Prior to commencement- RAMS Mitigation to be submitted
- Prior to occupation a Landscape Environmental Management Plan to be submitted
- Prior to completion connection shall be provided in full to the Public Right of Way
- Planted belt to be provided along northern building
- All dwellings in the northeast corner to be single storey

2.4. A S106 Agreement was also signed as part of the outline permission securing the following:

- 7 affordable dwellings comprised of the following:
 - 4 x 1-bedroom 2-person flats- affordable rent
 - 1 x 2-bedroom 4-person houses- affordable rent
 - 1 x 2-bedroom 4-person house- shared ownership
 - 1 x 3-bedroom 5-person house- shared ownership
- Primary school land contribution- £5,885
- Primary school construction contribution- £85,267

3. Principle of Development

- 3.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts, then that determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 3.2. The principle of developing the site for the erection of 20 dwellings has previously been established under Outline Permission 0085/17. The principle of residential development and quantum of development proposed cannot therefore be revisited at this stage and it is envisaged when granting outline planning permission that there will be at least one configuration of the development that would be acceptable at the reserved matters stage.

3.3. The key considerations, as discussed throughout this report relate to whether the proposed appearance, scale, landscaping and layout of the development responds appropriately to the character and amenity of the area, having regard to the relevant development plan policies.

4. Access, Connectivity, Parking and Highway Safety

4.1. Policies T9 and T10 and paragraphs 110, 111 and 112 of the NPPF seek to ensure that the highway network is safe for all users whilst also supporting and encouraging the uptake of active sustainable travel.

4.2. One access into the site would be provided from Pesthouse Lane as secured under the Outline Permission. The internal estate roads off the access would therefore create a cul-de-sac development, which is acceptable in this case bearing in mind the relatively minor number of dwellings proposed.

4.3. Parking provision is provided in accordance with Suffolk Parking Guidance (2019) and is proportionate to the proposed bedroom numbers within each dwelling. Thirteen garages are proposed across the development forming part of this parking provision. SCC Highways raised no objection, subject to a number of conditions which form part of the recommendation.

4.4. There are no instances of triple parking on site. Some double tandem parking is proposed where there are garages. It should be noted that all garages provided on site were conditioned under the outline permission to be retained in perpetuity for parking provision and incidental storage to the dwelling (i.e. they cannot be converted to additional living accommodation unless an application for planning permission was made in that regard). All garages proposed are surplus to SCC parking requirements.

4.5. Issues of connectivity from the site to services and facilities were matters considered under the Outline Permission and are not considerations under these reserved matters. A short section of shared cycleway/ footway is proposed in the northeast corner of the site to connect to an established footway running along Norwich Road. A 2-metre-wide footway is proposed internally along the western areas of the spine road, whilst this is not mirrored on the eastern side, there are grass 'service strips' of between 1 and 2 metres wide that provide safe access to the cycleway/ footway to the northeast.

4.6. The proposed development would comply with policies T9 and T10 and paragraphs 110, 111 and 112 of the NPPF.

5. Design and Layout

5.1. Policies CS5, GP1, H13 and H15 and paragraphs 126 and 130 of the NPPF work inter alia to secure a high standard of design in development.

5.2. The proposed dwellings adopt a contemporary appearance utilising red multi facing brickwork, larch cladding, white render, grey windows and grey and red roof tiles. Specific details of the materials are to be secured via condition.

5.3. The highest of the proposed dwellings would have a ridge height of 8.5 metres. The dwellings would be configured on site in the form of a mixture of terraced, semi-detached and detached dwellings. The one bungalow on site is located in the northeast corner, in compliance with condition 21 of the Outline Permission.

- 5.4. In addition to the thirteen garages, small sheds measuring 3 square metres are proposed on twelve of the plots. All dwellings have either a garage or shed providing secure cycle storage.
- 5.5. Different architectural features, materials and layout across the development would assist in ensuring there is a level of visual variety in the development, whilst securing a level of coherency with existing adjacent development.
- 5.6. No formalised public open space was secured via s106 agreement nor via condition on the Outline Permission, a small area of informal public open space measuring 658 metres squared has been provided centrally within the site.
- 5.7. The proposed development would accord with Core Strategy policy CS5, Local Plan policies GP1, H13 and H15 and paragraphs 130 of the NPPF.

6. Landscape Impact, Trees and Ecology

- 6.1. Policies CS5 and CL8 and paragraphs 131 and 174 of the NPPF seek to protect and enhance the natural environment in respect of landscape and biodiversity.
- 6.2. Where existing hedgerows and trees along the eastern and southern boundaries fall within the application site and they are proposed to be retained they are recommended to be protected by way of condition. However, it should be noted that many of these hedgerows and trees along the boundaries fall outside of the development site and the applicant's ownership, therefore their specific retention cannot be conditioned.
- 6.3. Along the eastern boundary additional landscaping is to be planted within the application site to thicken the existing boundary. The majority of existing trees within the site are proposed to be retained, however there some instances where low value trees are proposed for removal, specifically along the boundary of Plot 1 and within the flood compensation storage area. The removal of those trees is not objectionable.
- 6.4. In prominent locations on site 1.8-metre-high brickwork walls are proposed. 1.8-metre-high close boarded fencing is also proposed but would not be located in prominent or visible locations and would primarily be located to the rear of the dwellings to separate plots. Different surfacing materials are used across the site to increase the legibility of the scheme as to public and private areas. Hedgerows are proposed internally along the majority of the frontages and footpaths, ensuring the development adopts a semi-rural character in line with its location. A hedgerow is to be planted to the northern boundary adjacent to the proposed internal footpath connection to Norwich Road, in accordance with condition 20 of the Outline Permission.
- 6.5. Notwithstanding the submitted landscaping plans, additional information in regard to the hard and soft landscaping scheme and landscape management across the site have been requested by Place Services Landscaping. Such information is to be secured via conditions.
- 6.6. Place Services Ecology raised no objection from the perspective of potential impact on ecology and habitats. In addition to conditions imposed on the Outline Permission, additional conditions are recommended to secure biodiversity enhancement and a wildlife sensitive lighting scheme.
- 6.7. The scheme would comply with Core Strategy policies CS4 and CS5, Local Plan policy CL8 and paragraphs 174 and 180 of the NPPF.

7. Land Contamination, Flood Risk, Drainage and Waste

- 7.1. Policy CS4 and paragraphs 159, 167 and 174 of the NPPF seek to ensure that future occupiers and existing neighbouring development is safe for its lifetime in respect of pollution and flood risk.
- 7.2. There are no land contamination issues on site as established under the Outline Permission and confirmed again by the Council's Environmental Protection Officer under this application.
- 7.3. The site is vulnerable to pluvial (surface water) flooding, with different areas on the site ranging from being at a very low to high risk. The majority of the high risk is to the western side of the site, with the dwellings being positioned in the lower risk areas to the east of the site, such that a sequential approach to the siting of the dwellings is an appropriate response, notwithstanding the need to consider aspects of flood risk more specifically.
- 7.4. It is noted that the Local Lead Flood Authority (LLFA) (SCC Floods and Water) had a holding objection at the time the Outline Permission was granted. Outline Permission was however granted with a condition requiring additional flood risk information to be submitted (condition 5). This condition demonstrates that on the balance of probability officers at the time understood there to be sufficient and reasonable likelihood that such flood risk issues could be appropriately mitigated to enable the site to be developed at the quantum of development proposed. Owing to the history on the site and continued flood risk, the LLFA continue to object to the principle of development under these reserved matters. As the decision takers, the Council cannot however object to the principle of development because planning permission has already been granted; it is implicit in such a grant that the quantum of development applied is settled and there will be at least one configuration of development at the reserved matters stage that can be acceptably brought forward.
- 7.5. Officers must now instead be satisfied that the flood risk strategy required by condition 5 adequately ensures the development is as safe as possible for its lifetime and does not increase flood risk elsewhere.
- 7.6. Owing to the position of the LLFA, an external independent flood risk consultant was instructed by the LPA to assess the submitted flood risk strategy. Following numerous discussions and iterations, the external independent flood risk consultant is now satisfied that the strategy achieves as much as reasonably practical to mitigate flood risk on site. The strategy includes the excavation of a large area (measuring 8172 cubic metres) to the west of the site to provide flood compensation storage. The northern, southern and western sides would have a 1 in 3 slope gradient and the eastern boundary (closest to the dwellings) would have a 1 in 10 slope gradient.
- 7.7. Whilst this does not fully overcome the flood risk on site, officers consider on balance that this strategy sufficiently addresses the requirements of condition 5 imposed on the Outline Permission in respect of flood risk mitigation measures and ensures the proposed layout forming part of the reserved matters is appropriate. Condition 5 will nonetheless have to be discharged under a separate discharge of conditions application as it is not a reserved matter.
- 7.8. It should however be noted that the despite the submitted strategy, the LLFA as a statutory technical consultee assessing pluvial flood risk, is unable to remove their objection as they have a fundamental issue with the principle of development on the site. However, the LLFA have

nonetheless recommended conditions noting that the principle of development cannot be revisited at this stage, which form part of the officer's recommendation.

- 7.9. On balance, whilst there is some conflict with policy CS4 in respect of flood risk, taking the history of the site, outline permission and submitted flood risk strategy, pluvial flood risk has been adequately addressed.

8. Sustainability

- 8.1. A condition is imposed to secure sustainability and energy measures on the development. However, a range of measures have been accommodated into the development as follows:
- All dwellings are orientated with a roof slope facing south or west to exploit solar energy via PV panels
 - Secure covered cycle storage is provided for all dwellings
 - Simple rectilinear/ cuboid forms used to deliver low wall to floor ratios (maximum volume and minimum envelope) which minimises exposed fabric and thus heat loss and use of materials
 - Energy efficiency in accordance with Building Regulations, energy assessments will be conducted to determine the most effective efficiency measures to be used (including consideration of using air source heat pumps)
 - Efficient water consumption in accordance with Part G(2) of Building Regulations
 - Electric vehicle charging points provided to all dwellings (secured via condition)
 - Opportunities for biodiversity enhancement and increased landscape value across the site (secured via condition)
 - A connection is proposed to the adjacent footway in the northeast corner of the site to support active travel and provide a direct route to the bus stop

9. Impact on Residential Amenity

- 9.1. Policies H16 and H17 and paragraph 130 of the NPPF seeks to protect residential amenity of neighbouring properties and ensure adequate amenity of future occupiers of developments in order to achieve and maintain well-designed places.
- 9.2. The dwelling in the northeast corner of the site is a bungalow (as required by condition 21 of the Outline Permission). This bungalow is the closest of all proposed plots to existing neighbouring development, the bungalow form thus mitigates against overlooking, loss of light, overshadowing and loss of privacy to the existing neighbouring property (Sunnyside).
- 9.3. The proposed garden sizes are proportionate to the size of each dwelling and range from a minimum of 52 square metres (plot 6 which is a 1-bedroom house) to a maximum of 579 square metres (plot 17 which is a 4-bedroom house). Each dwelling would thus be served by adequate private amenity space.
- 9.4. The proposed development would comply with Local Plan policies H16 and H17 and paragraph 130 of the NPPF.

PART FOUR – CONCLUSION

10. Planning Balance and Conclusion

- 10.1. The proposed development is strictly in conflict with local and national flood risk policy, in so far as the development is at risk of flooding and there is no guarantee that the dwellings will remain safe for their lifetime. Importantly, however, the principle of developing the site with 20 dwellings was previously established under the Outline Permission, such that these reserved matters cannot revisit the principle of whether 20 dwellings on the site is acceptable with regard to flood risk, including through the application of the sequential and exceptions test (as outlined under paragraphs 162, 163, 164 and 165 of the NPPF).
- 10.2. The Outline Permission was granted with condition 5 requiring a flood risk strategy to be submitted which acknowledged existing flood risk issues on site and considered there to be a feasible way of ensuring flood risk was appropriately addressed. Extensive work has been carried out by the applicant in discussion with the LPA, LLFA and external independent flood risk consultant to ensure that, as far as reasonably possible and foreseeable, the flood risk strategy proposed is both feasible and effective in ensuring the development would be likely on the balance of probability to be safe for its lifetime and would not increase flood risk elsewhere taking account of site constraints, existing adjacent development and the consented outline development.
- 10.3. Whilst there is strictly some conflict with the development plan in respect of policy CS4 by way of flood risk, as noted above flood risk issues insofar as principle cannot be revisited through these reserved matters. Moreover, officers are content that condition 5 on the outline permission has been adequately addressed through the flood risk strategy. Solely in respect of the reserved matters (appearance, scale, landscaping and layout), the development does accord with the relevant policies of the development plan. Approval of the reserved matters is therefore recommended.

RECOMMENDATION

Approve reserved matters subject to the following conditions and informatives, and any others as may be deemed necessary by the Chief Planning Officer.

Conditions

- Development to be in accordance with approved plans
- Arboricultural method statement to be submitted
- Notwithstanding the submitted details, hard and soft landscaping scheme to be submitted (including landscaping details around flood compensation storage), all soft landscaping to be planted in the first available planting season.
- Landscape Management Plan (including open space and flood compensation storage) to be submitted
- Wildlife Sensitive Lighting Scheme to be submitted
- Biodiversity Enhancement Scheme to be submitted
- Bin presentation and storage areas to be submitted
- EV charging points to be submitted
- Sustainability and Energy Statement to be submitted
- Surface Water Verification Report to be submitted

- Material details to be submitted
- Removal of all permitted development rights that would have a material bearing on the run-off characteristics of the site, i.e. alterations and extensions to dwellings, outbuildings, surfacing within plots and means of enclosure.

Informatives

- NPPF proactive working- no pre-app
- Conditions and obligations on the outline permission must be discharged separately from these reserved matters and complied with- any details that overlap between these reserved matters and the requirements of a separate condition must match one another
- East Suffolk Drainage Board comments