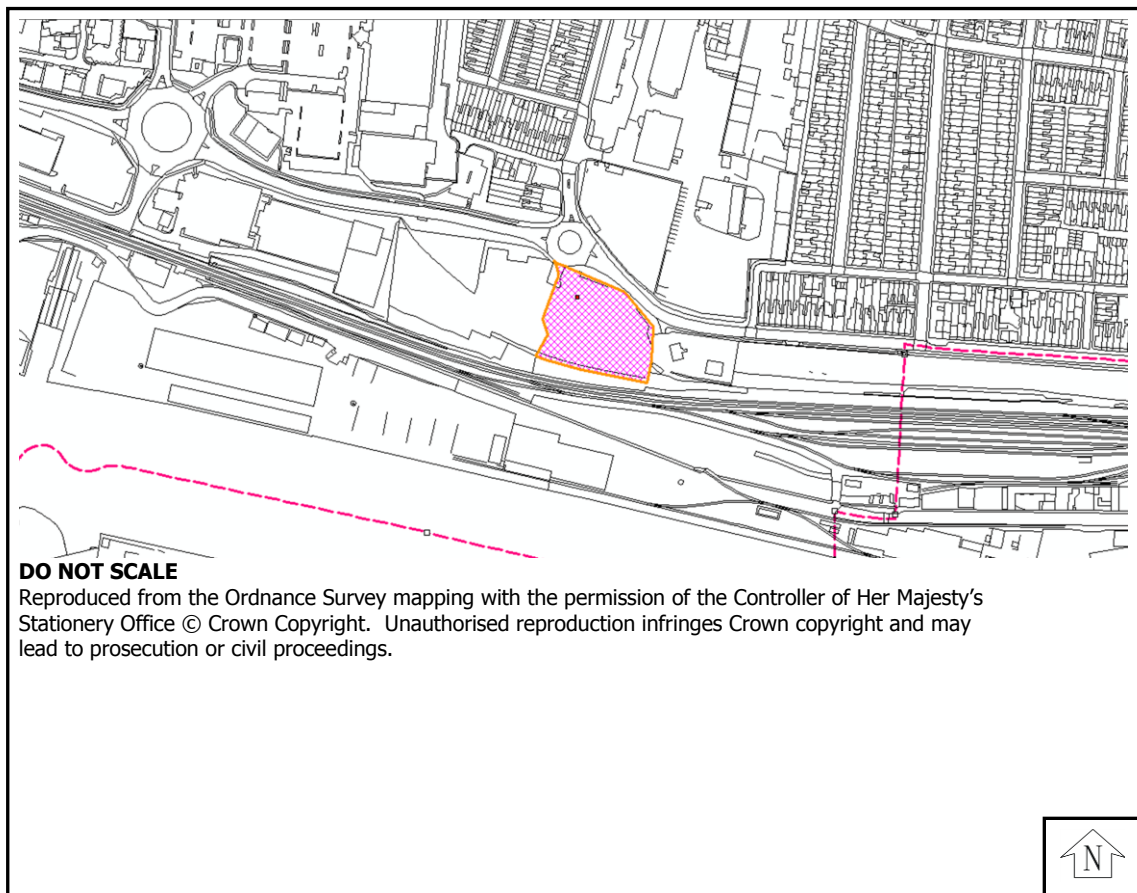


PLANNING COMMITTEE – 13 DECEMBER 2016**APPLICATION NO DC/16/3844/OUT****LOCATION**Coal Stacking Ground
Denmark Road
Lowestoft
Suffolk**EXPIRY DATE** 13 December 2016**APPLICATION TYPE** Outline**APPLICANT** Austringer Land Limited**PARISH****PROPOSAL** Outline Application – Construction of 651 sq. m of Class A1 retail warehouse floorspace, 279 sq. m of Class A1/A3/A5 floorspace and a 338 sq. m Class A3/A5 ‘drive-thru’ fast food restaurant.

1 SUMMARY

- 1.1 There is an extant planning permission on the application site, granted on appeal in 2014, for 3,856 sq.m of retail warehouse floorspace. This application seeks consent for 1,268 sq.m of floorspace which includes 651 sq.m of retail warehouse floorspace already confirmed to be acceptable by the appeal approval. The remaining 617 sq.m comprises a fast food drive-thru restaurant and 3 small retail pod units.
- 1.2 The application therefore proposes a total increase of 617 sq.m across the whole site. The increased floorspace is proposed to complement the approved retail facilities at the site, and the existing retail and commercial floorspace in the adjacent area.
- 1.3 The land is allocated in the AAP under Policy SSP9 for employment uses. However given the extant planning permission this is not considered to be a viable reason for refusal. In any event it is likely that there is still an oversupply of employment land in the District. The proposed increase in retail floor space is not considered to have a harmful effect on the vitality and viability of Lowestoft town centre and there is no available sequentially preferable site to accommodate the proposed development as a whole.
- 1.4 The application site is a potential landing point for the proposed third crossing of Lake Lothing. However this is not considered to be an issue of material substance for the consideration of this application. The Nationally Significant Infrastructure Proposal (NSIP) process makes provision for dealing with such circumstances where third party land is required to deliver an NSIP project. There are provisions within the NSIP Development Consent Order (DCO) process to enable the land required to deliver the bridge to be delivered. This application, if approved, would not affect the third crossing process at all. Should this application be approved Counsel advice has confirmed that there would be no liability on the Council.

2 SITE DESCRIPTION

- 2.1 The site covers some 1.2 hectares to the south of Peto Way and Denmark Road and is accessed off the roundabout at the junction of these two roads. The area surrounding the site contains a mix of retail, residential, commercial and port related uses. To the northwest lies the North Quay Retail Park and to the north is residential development along Rotterdam Road. To the south, beyond the railway line, is port related employment land and associated buildings.
- 2.2 Along the southern boundary of the site is the railway line whilst to the east is a second hand car dealers. The Wickes DIY store is located to the west of the site and beyond this is the Lidl foodstore (currently being replaced with a new larger store) and Bannatynes.
- 2.3 The site currently lies vacant and is derelict. Its previous uses have been as a coal depot and, more recently, as a car storage and parking area. The majority of the site is covered by concrete hardstanding and is enclosed with palisade fencing along each of its boundaries. The site is vacant and there is some evidence of fly tipping.

3 PROPOSAL

- 3.1 This application relates solely to the eastern half of the site. It seeks to deliver 1,268 sq.m of floorspace configured as 651 sq.m of Class A1 retail warehouse floorspace, 279 sq.m of Class A1/A3/A5 floorspace and a 338 sq.m Class A3/A5 'drive-thru' fast food restaurant. Access is proposed from the existing roundabout.
- 3.2 The application does not propose any overall increase in Class A1 retail warehouse floorspace across the whole site as the 651 sq.m proposed in this application is off set by a corresponding reduction of 651 sq.m proposed in the western part of the site (see separate application DC/16/3845/VOC).
- 3.3 The only increase in floor area proposed above that which already has approval is 617 sq.m comprising three Class A1/A3/A5 Pod Units (93 sq.m each = 297 sq.m) plus the Class A3/A5 drive-thru fast food restaurant (338 sq.m).
- 3.4 Across the whole site the proposed developments will provide 177 car parking spaces for use by customers. Of the 177 customer spaces, 16 spaces for less-able bodied users will be provided and 3 electricity charging spaces will be provided. In addition, space for 24 bicycles and 15 motorcycles will be provided.
- 3.5 The proposal is anticipated to create 67 FTE employment positions across the whole site. This is an additional 33 FTE employment positions when compared to the extant permission (See Section 6 – Planning History).

4 CONSULTATIONS/COMMENTS

- 4.1 **Neighbour Consultation/representations:** 17 neighbouring properties were notified of the application. 4 representations have been received raising the following points:
 - The development is too close to the third crossing roundabout
 - The development should be refused/deferred until the third river crossing is finalised and built.
 - Should not grant planning permission on the line of the 3rd crossing.

Consultees

- 4.2 **Suffolk County Council Highways:** Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:
- 4.3 **Condition 1:** No part of the development shall be commenced until details of the proposed access have been submitted to and approved in writing by the Local Planning Authority. The approved access shall be laid out and constructed in its entirety prior to any other part of the development taking place. Thereafter the access shall be retained in its approved form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

- 4.4 Condition 2: No part of the development shall be commenced until details of a cycleway/footway is provided from the development to connect the existing footway on the south side of Denmark Road have been submitted to and approved in writing by the Local Planning Authority. The approved footway shall be laid out and constructed in its entirety prior to occupation of the properties. Thereafter the access shall be retained in its approved form. Comments: A footway should be a minimum width of 1.8m.

Reason: To ensure that the footway is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

- 4.5 Condition 3: Before the development is commenced details of the areas to be provided for disabled car parking provision and secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Note: The submitted car parking provision is not in accordance with Suffolk Guidance for Parking which requires disabled car parking bays dimensioned at 2.9m x 5.5m with a 1m buffer strip between bays. Cycle storage should be secure and covered.

Reason: To ensure the provision and long term maintenance of adequate on-site space for parking and manoeuvring of vehicles.

- 4.6 Condition 4: Before the access is first used visibility splays shall be provided in accordance with details previously approved in writing by the Local Planning Authority and thereafter shall be retained in the approved form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.

- 4.7 Condition 5: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

4.8 **Suffolk County Council Archaeological Service:** We reviewed the application and on the basis of the previous land use consider that although the development is on the edge of the water, the potential for archaeological remains being impacted on by development is likely to be low. In my view, there would not be a need for a condition relating to a programme of archaeological work.

4.9 **Suffolk County Council Floods Planning:** Notice is hereby given that the County Council as Lead Local Flood Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

1. Concurrent with the first reserved matters application a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:

- a. Dimensioned plans and drawings of the surface water drainage scheme;
- b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
- c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
- d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
- e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
- f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
- g. Details of who will maintain each element of the surface water system for the life. The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

2. Concurrent with the first reserved matters application details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

3. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register

4. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.

- 4.16 **Suffolk Fire and Rescue Service:** The Fire Authority request that adequate provision is made for fire hydrants by the imposition of a suitable planning condition.
- 4.17 **Suffolk Police:** Thank you for the opportunity to comment on the above outline planning application.
- 4.18 On a development of this type and size I would strongly recommend that an application for Secured by Design Commercial approval is made.
- 4.19 An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.
- 4.20 Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.
- 4.21 These features include secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances natural surveillance and safety.
- 4.22 Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.
- 4.23 The role of the Designing Out Crime Officer within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a 'fortress environment'.
- 4.24 The SBD document SBD Commercial 2015 v2 reference guide for commercial developments is available from www.securedbydesign.com.

- 4.25 I would be pleased to work with the client and the designer at the detailed design stage when the following should be considered:
- 4.26 Page 12 of the Design and access Statement refers to Development Management Policy DMO2 as being applicable to this development. This states that developers should “take into account the need to promote public safety and deter crime and disorder through careful layout and design of buildings, car parking areas, landscaping, public spaces and pedestrian routeways”;
- 4.27 Waveney’s Development Policy also states that developments should be safe and take account of crime prevention and community safety considerations. Developers should therefore ensure that 'Secured by Design' principles are incorporated within all schemes.
- 4.28 This will require particular consideration to the layout of the development to allow for effective natural surveillance and supervision of public areas. Where appropriate, public areas should be clearly visible from adjoining buildings and the design and landscaping should provide for clear sight-lines on public routes (paths, cycle ways etc.) and not create unnecessary concealed areas.
- 4.29 Using these nationally recognised standards as design benchmarks can often result in a more secure and safe development without placing a financial burden on the developer.
- 4.30 Other recommendations relating to Secured by Design include:
- 4.31 **1 Section 17 of the ‘Crime and Disorder Act 1998’**
- 4.32 This part of the CDA places a duty on each local authority: ‘to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment’.
- 4.33 Despite other legislative considerations within the planning process, there is no exemption from the requirement of Section 17 as above. Reasonable in this context should be seen as a requirement to listen to advice from the Police Service (as experts) in respect of criminal activity. They constantly deal with crime, disorder, anti-social acts and see on a daily basis, the potential for ‘designing out crime’.
- 4.34 This rationale is further endorsed by the content of PINS 953.
- 4.35 **2 National Planning Policy Framework.**
- Paragraph 58** states:-
- 4.36 “Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion”.

Paragraph 69.

- 4.37 This paragraph looks towards healthy and inclusive communities. The paragraph includes:-
- 4.38 “Planning policies and decisions, in turn, should aim to achieve places which promote:
- 4.39 Safe and accessible developments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion”
- 4.40 I would ask that you take these points into account when making your decision.
- 4.41 **WDC Environmental Health Officer:** Contaminated land: The LK Consult Ltd report submitted with the application recognises that there are potential sources of contamination which will require further assessment / investigation and recommend that an intrusive investigation is conducted. I would concur with this and advise that the further works, together with any remediation and validation which may subsequently be required, should be secured using the model CL conditions:
- 4.42 "Unless otherwise agreed by the Local Planning Authority, development other than that required to be carried out as part of an approved scheme of remediation must not commence until conditions 1 to 4 have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until condition 4 has been complied with in relation to that contamination.
- 4.43 1. Site Characterisation
An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:
- (i) a survey of the extent, scale and nature of contamination;
 - (ii) an assessment of the potential risks to:
 - human health,
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - adjoining land,
 - groundwaters and surface waters,
 - ecological systems,
 - archaeological sites and ancient monuments;
 - (iii) an appraisal of remedial options, and proposal of the preferred option(s).
- This must be conducted in accordance with DEFRA and the Environment Agency’s ‘Model Procedures for the Management of Land Contamination, CLR 11’.

4.44 2. Submission of Remediation Scheme

A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

4.45 3. Implementation of Approved Remediation Scheme

The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report (referred to in PPS23 as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

4.46 4. Reporting of Unexpected Contamination

In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 2, which is subject to the approval in writing of the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 3."

4.47 Noise:

The proposed A3/A5 fast food drive through use has the potential to introduce significant noise at potentially sensitive / unsociable times of the day (such as early morning and late night trading, and early morning deliveries) and there are existing residential dwellings within approximately 50m of the development site. As such I have concerns that the proposals could cause a detrimental impact on amenity due to noise. Unfortunately I can find no assessment or consideration of noise within the documentation submitted by the applicant. I would be opposed to the development taking place until such time as the applicant can demonstrate that noise from use of the development will not cause a noise nuisance or detriment to the amenity of nearby existing residents. I would advise that such an assessment of noise should be obtained from the applicant before permission is granted in case it is proven that the development is not suitable for the site or noise mitigation measures need to be the subject of planning conditions (such as restricted trading or delivery hours). However, if the LPA is minded to ignore this advice and grant a conditioned permission a conditioned such as this (or similar) should be imposed:

- 4.48 “Before the development hereby permitted commences a scheme shall be agreed with the local planning authority which identifies all potential noise sources (especially any fixed plant source as coolers, heaters, extractors, air conditioning etc.), details their predicted acoustic performance and specifies the provisions to be made for the control of noise emanating from the site. Any and all approved noise mitigation measures must be implemented prior to any occupation or use of the approved development.”
- 4.49 **Odours:**
Similarly to noise above the proposed end use and proximity of existing dwellings provides reason to anticipate that odours could have a detrimental impact. The applicant has not submitted any consideration or assessment of odours with the application. I believe that there is a lower potential for odour to cause a significant nuisance or impact on existing residents than noise and would advise that odour issues could be conditioned:
- 4.50 “Before the development hereby permitted commences a scheme shall be agreed with the local planning authority which identifies all potential sources of odour, predicts and assesses odour emissions and specifies the provisions to be made for the control of odours emanating from the site. Any and all approved odour mitigation measures must be implemented prior to any occupation or use of the approved development.”
- 4.51 If you have any queries or concerns with any of the above please do not hesitate to contact me further.
- 4.52 **Environment Agency:** The Environment submitted a holding objection on flood risk grounds. In response the applicant has submitted a revised Flood Risk Assessment (FRA). The Environment Agency’s views on the revised FRA are awaited and will be reported at the meeting.
- 4.53 **Network Rail:** Thank you very much for consulting with Network Rail in regards to application DC/16/3844/OUT and offering us the opportunity to comment.

The developer/applicant must ensure that their proposal, both during construction and after completion of works on site, does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company’s railway and its infrastructure
- undermine its support zone
- damage the company’s infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

- 4.54 **Suffolk County Council – Consenting Manager, Ipswich and Lowestoft Crossings**

- 4.55 I have prepared this response in the context of the Lake Lothing Third Crossing project in response to the land use conflict between the proposed applications and that project, as described in more detail below.
- 4.56 I note that the site to which the above applications relate benefits from planning permission granted via appeal in 2014, reference DC13/0110/OUT and that application was subsequently varied in 2015, reference 15/3089/VOC.
- 4.57 The current situation is that 3,856m² of A1 retail land uses is permitted spread across five retail units. Condition 5 of the current consent restricts the use to the sale of the following bulky goods: DIY and improvement products for the home; garden products; furniture and carpets and floor coverings.
- 4.58 This restriction allowed the Inspector in the aforementioned appeal (reference APP/T3535/A/13/2210580) to conclude that “there would be no harmful impact to the vitality or viability of the town centre is predicted, provided that the new floor space would trade in bulky goods only”.
- 4.59 The Inspector went on to say that “The parties agreed that a condition could secure the goods restrictions intended and which is necessary to protect the role and vitality of the town centre” [emphasis added].
- 4.60 The restriction to bulky goods was thus a central tenet of allowing the appeal in 2014. The current application 16/3844/OUT seeks outline permission for 279m² of class A1/A3/A5 floor space and a 338m² Class A3/A5 restaurant. It is not clear that any restrictions are proposed on the sale of goods from the retail “pod units”.
- 4.61 Collectively these uses represent a net increase in floor space over that which has existing consent. The uses proposed in this application are also contrary to those found to be acceptable in the previous appeal and remain contrary to the Local Plan, which seeks to both protect the town centre (policy RLT1) and allocate this site for B class uses (policy SSP9). As such, should WDC be minded to approve the application, it should be advertised as a Departure in line with the provisions of the Development Management Procedure Order.
- 4.62 With respect to the sequential test, I note that the applicant has applied this on the basis of the entire site, including development proposed which is not the subject of application 16/3844/OUT. I ask WDC to consider the acceptability of this approach and whether such a methodology has been taken to complicate the process of being able to find a sequentially preferable site for the smaller scale of development proposed as part of this application.
- 4.63 No evidence is provided for the justification of the increase in overall retail floor space, which at 15% the applicant considers “minimal”. It is not clear why, for example, the proposed new floor space should not be offset by reductions in other units.

- 4.64 I also ask that WDC consider the application in the context of its *Retail and Leisure Needs Assessment 2016*¹, not referred to by the applicant and whether the scheme contributes to meeting needs identified therein.
- 4.65 Finally, I believe there is an error in the Design and Access Statement, which describes the site as long-term vacant (paragraph 1.22 (4)). Evidence from Google Earth shows the site in use (see Annex).

Lake Lothing Third Crossing

- 4.66 Suffolk County Council is proposing to construct a new road crossing of Lake Lothing in Lowestoft (known as Lake Lothing 3rd Crossing). Lake Lothing 3rd Crossing has been designated by the Secretary of State for Transport as a Nationally Significant Infrastructure Project, meaning that Suffolk County Council is able to apply to the Secretary of State for Transport for a Development Consent Order. The Direction is available on SCC’s [website](#). SCC has received a provisional funding award of £73.39m from the Department for Transport.
- 4.67 We have identified a central crossing of Lake Lothing as the preferred location. The general alignment is as shown in our recent [newsletter](#). The northern landing point of the scheme is in the same area as both of the applications currently under consideration. The northern landing point is constrained by:
- The need to provide a satisfactory tie in to Denmark Road;
 - The positioning of the East Suffolk Line and the clearance required over that;
 - The location of buildings on the north quay within the Port;
 - The need to cross the Lake perpendicular to the quays to allow a bascule bridge;
 - The positioning of the shipping turning circle within the Lake; and
 - The alignment of Riverside Road to the south
- 4.68 As such, there are no circumstances in which the use of the land covered by applications 16/3844/OUT and 16/3845/VOC can be avoided.
- 4.69 Consequently, I would like to also make you are aware that we are in discussions with the landowner in respect of the interaction of the project with this land and are undertaking surveying and design work to be better understand the impact on the land.
- 4.70 WDC will also be aware that the Outline Business Case made an allowance for land acquisition costs and that landowners are entitled to compensation where the land is required for the scheme, whether that is secured by agreement, or by the use of compulsory acquisition powers, which development consent orders may include.

PUBLICITY

The application has been the subject of the following press advertisement:

Category	Published	Expiry	Publication
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Major application.	23.09.2016	13.10.2016	Beccles and Bungay Journal
Major application.	23.09.2016	13.10.2016	Lowestoft Journal
Departure.	04.11.2016	24.11.2016	Beccles and Bungay Journal
Departure.	04.11.2016	24.11.2016	Lowestoft Journal

SITE NOTICES

The following site notices have been displayed:

General Site Notice	Reason for site notice: Major application, Departure. Date posted 16.09.2016 Expiry date 06.10.09.2016
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5 PLANNING POLICY

- 5.1 The National Planning Policy Framework (NPPF) was published in March 2012. At the heart of the NPPF is a presumption in favour of sustainable development (para. 14). The NPPF makes clear that for decision taking, the presumption means approving development proposals that accord with the development plan without delay. In particular the NPPF, at paragraph 17, encourages the effective use of land by reusing land that has been previously developed (brownfield land).
- 5.2 The **Core Strategy** was adopted in January 2009. **Policy CS01** states that Lowestoft is the main town in the District where it is envisaged approximately 70 to 80% of the housing growth and 70 to 80% of the additional 5000 jobs are to be created, with the majority of this growth on previously developed land. **Policy CS02** requires high quality and sustainable design. In particular proposals should reflect local character and distinctiveness. **Policy CS05** states that an Area Action Plan for the Lake Lothing and Outer Harbour area will be prepared. **Policy CS07** states that the Lake Lothing area will be identified and developed as a strategic employment site through the Area Action Plan. **Policy CS10** requires new retail, leisure and office uses to be located in existing town centres wherever possible. **Policy CS15** states that the District Council will continue to promote the creation of a third crossing of Lake Lothing.
- 5.3 The **Development Management Policies** were adopted in 2011. **Policy DM02** sets down Design Principles for new development, in particular proposals should be sympathetic to the character of a site and the quality of the built environment.
- 5.4 The **Lake Lothing and Outer Harbour Area Action Plan** was adopted in 2012. **Policy SSP9** designates the application site as part of the Peto Way/Denmark Road Corridor which is allocated for employment development comprising B1, B2 and B8 uses. **Policy RLT1** states that retail development will be accommodated as part of a town centre expansion, including the redevelopment of Peto Square. **Policy FRM1** is concerned with flood risk.

6 PLANNING HISTORY

- 6.1 In 2012 outline consent for a non-food retail warehouse on the site was refused for two reasons. The first reason was on the grounds that the proposal was contrary to Policy SSP9 of the Lowestoft Lake Lothing and Outer Harbour Area Action Plan (January 2012) which allocates the site for employment development. The second reason was that the proposal was considered likely to have an adverse impact on the vitality and viability of the town centre (DC/11/1224/OUT).
- 6.2 In 2013 a second application for the same scheme was also refused but this time only on the grounds that the proposal was contrary to Policy SSP9 (DC/13/0110/OUT) as evidence had shown that the proposal would not have an adverse impact on the town centre.
- 6.3 In 2014 an appeal against this second refusal was allowed and planning permission was granted for a retail warehouse development measuring 3,856 sq.m and associated car parking and access. The site therefore benefits from an extant planning permission.
- 6.4 In 2015 the layout of the development was subsequently amended to provide five large format retail warehouse units rather than one unit. The application did not propose any additional floorspace and the combined floorspace of the five units remained at 3,856 sq.m (DC/15/3089/VOC).
- 6.5 A separate application for consideration on this Agenda seeks a further amendment to the layout of the development and the access (DC/16/3845/VOC).

7 PLANNING CONSIDERATIONS

- 7.1 The main issues to take into account in the consideration of this application are planning policy and the planning history of the site. A further consideration is the proposed third crossing of Lake Lothing.
- 7.2 The site is allocated for employment uses (B1, B2 and B8) by Policy SSP9 of the Area Action Plan (AAP). The aim of Policy SSP9 is to provide priority relocation space for appropriate businesses that will be displaced by other strategic site proposals as set out in the AAP. The proposed retail uses are therefore contrary to the uses envisaged by Policy SSP9.
- 7.3 However, as will be noted in Section 6, the site benefits from planning permission granted via appeal in 2014 for a retail warehouse of 3,856 sq.m and therefore this is considered to be the starting point for the consideration of this application. Condition 5 of the consent restricts the sale of goods to 'bulky' goods, recommended by independent retail advice obtained at the time of the appeal, in order to ensure that there would be no harmful impact on the vitality of viability of the town centre. The layout was subsequently amended and the current situation is that consent exists for 3,856 sq.m of A1 retail space spread across five retail units.
- 7.4 Furthermore, in allowing the appeal the Inspector was of the view that:-

“Loss of the appeal site, and therefore some 1.4 ha of employment land, is unlikely to impact on supply to such an extent as to be prejudicial to the wider employment outcomes sought in the AAP”.

7.5 The Inspector concluded as follows:-

“It is true that there is conflict with the adopted Policy SSP9, but other material considerations lead me to conclude that the proposal represents sustainable development (for the economic, social and environmental gains forthcoming) without compromising compliance with the development plan as a whole. No other matters raised alter the balance of my considerations or my decision to allow the appeal.”

7.6 This application relates to 1,268 sq.m of floorspace. However 651 sq.m comprises of Class A1 retail warehouse floorspace which has already been found to be acceptable by the appeal decision. The additional 617 sq.m of floorspace in this application consists of 3 small ‘pod’ units (93 sq.m each) and a drive-thru fast food restaurant (338 sq.m). The submitted Planning, Retail and Design & Access Statement states that the pod units and drive-thru are designed to serve users of the application site and wider retail and commercial area adjacent to the application site including North Quay Retail Park, Wickes and Lidl located on Denmark Road and Peto Way. The proposed pod units and restaurant are therefore intended as complementary services typically found on retail warehouse sites.

7.7 As the additional retail floorspace proposed consists only of the pod units and restaurant this proposal is not considered to be significantly different to the application approved on appeal. Therefore in view of the appeal decision and the Inspectors reasoning it is not considered appropriate to refuse this application on the grounds that it is contrary to Policy SSP9.

7.8 The National Planning Policy Framework (NPPF) requires retail and leisure proposals that are outside of principle shopping and commercial areas of town centres to be subject to an impact assessment and sequential test.

7.9 With regards to the sequential test it was agreed at the appeal hearing that there was no sequentially preferable site within or closer to the town centre available for the proposed retail warehouse. Nevertheless it is considered appropriate to reconsider the sequential test in respect of this current application.

7.10 A number of town centre sites have been considered in the applicant’s sequential test. The largest available unit in the town centre is the former BHS store but this was discounted from the sequential assessment because it could not accommodate the scheme and did not have the road access needed for a drive-thru restaurant. However the BHS store could potentially accommodate at least part of the proposed scheme given its size, although there is no policy requirement to disaggregate schemes when undertaking the sequential assessment. In response to this issue the submitted Planning Statement refers to a number of appeal decisions relating to the application of the sequential test. In particular these have determined that when applying the sequential test the proposal as a whole needs to be considered and not a disaggregated version. The applicant therefore argues that the

sequential test has to apply to the whole of the floorspace proposed. This means that consideration has to be given to sequentially preferable locations that can accommodate the whole proposal and not the component, altered or disaggregated parts of it.

7.11 A further important consideration is that drive-thru restaurants, unlike conventional restaurants, require vehicular access and circulation. Alternative sites considered in the sequential assessment are as follows:

7.12 Former QD Store, London Road North

The former QD store represents only 24% of the quantum of development proposed at the application site and does not provide a sufficient amount of floorspace to accommodate the proposed development even with a significant degree of flexibility applied. In addition the unit is not an appropriate location to accommodate a drive-thru fast food restaurant. A second QD store to the rear of the Britten Centre has been discounted as it is too small to accommodate the scheme and could not accommodate a drive-thru restaurant.

Since this assessment the store has reopened as Pound Stretcher.

7.13 Former Argos and Millets Units, London Road North

The units are not located adjacent to each other and in any event the units do not provide a sufficient amount of floorspace to accommodate the proposed development. In addition the units are not an appropriate location to accommodate a drive-thru fast food restaurant.

Since the assessment the Millets store has been refurbished and is now trading again.

7.14 Former Post Office, London Road North

The post office has a floor area of 1,130 sq.m which represents only 25% of the quantum of development proposed at the application site and does not provide a sufficient amount of floorspace to accommodate the proposed development even with a significant degree of flexibility applied.

7.15 In addition the unit is a listed building that is not suitable for the conversion to large format bulky goods retail uses. It is also not in an appropriate location to accommodate a drive-thru fast food restaurant.

7.16 Peto Square and South Quay

Peto Square and South Quay are allocated under Policy SSP2 of the AAP for retail, leisure and commercial uses. However the AAP acknowledges that the retail aspirations would require reconfiguration of the railway station and there are considerable constraints to achieving such a comprehensive redevelopment scheme in the short term. As such this area was discounted because existing premises were either too small or not available.

7.17 Custom House

The Custom House is an existing office building that measures approximately 280 sq.m at ground floor and 280 sq.m at first floor. It is a listed building that is not suitable for the conversion to provide a large format retail unit. It is also too small for the proposed development.

7.18 Former Godfreys Unit

This unit was vacant but has since been reoccupied by Mattressman and so is no longer available.

7.19 Battery Green Car Park

The carpark is an operational car park that forms part of the Wilkinsons and Peacocks building. There are no proposals in place for the redevelopment of the car park and nor is it allocated for retail uses or being marketed for development. There are existing retail uses in operation and so the site is not available to be developed now.

7.20 Following the application of the sequential test it is considered that it has been demonstrated that there are no available sequentially preferable sites that could accommodate the proposed development.

7.21 With regards to the impact test the previous appeal proposal for 3,856 sq.m of retail warehouse floorspace was found not to have an impact on the vitality and viability of the town centre (subject to the imposition of a 'bulky good' condition). This application relates to 1,268 sq.m of floorspace (of which 651 sq.m was tested in the appeal proposal) which is below the threshold for assessing impact. The NPPF requires proposals of more than 2500 sq.m to be subject to an impact test and therefore this proposal falls well below that threshold. It can therefore be concluded that the proposal will not have an adverse impact on the town centre. If this application is approved it is suggested that sales from the retail warehouse unit comprising 651 sq.m of floorspace, should be restricted to bulky goods only. This could be secured by a condition.

7.22 The pod units are intended to be complementary uses as explained above. They are not intended to be Class A1 'shops'. They aim to satisfy a site specific requirement to serve users of the proposed retail development and the existing surrounding retail and commercial areas. The Class A1 permission is only required in conjunction with the Class A3/A5 use to enable the 'sale of cold food for consumption off premises'. It would be appropriate therefore to restrict sales from the pod units if planning permission is granted. This restriction could be secured by condition.

7.23 As the site is allocated for employment uses under AAP Policy SSP9 it is necessary to consider the demand for and supply of employment land within the District. Estimated demand for employment land within the Employment Land Needs Assessment (2016) is 16.5 hectares, assuming uplift in demand caused by offshore energy (13 hectares without offshore energy demand). The Employment Land Availability Assessment (2015) demonstrated that there is 86.98 hectares of employment land available for development. Some of the sites included in the supply of employment land are not immediately available. This includes sites at Broadway Farm in Halesworth and Ellough Airfield and Beccles Business Park. However even when these sites are discounted it is likely that there is still an oversupply of employment land in the District.

Lake Lothing Third Crossing

- 7.24 The proposed Lake Lothing Third Crossing has been identified by Policy CS15 of the Core Strategy as important to dealing with transport problems in Lowestoft and Suffolk County Council, as the relevant Highway Authority, will lead the delivery of the crossing.
- 7.25 The application site is a potential landing point for the northern side of the proposed third crossing of Lake Lothing. However this is not considered to be an issue of material substance for the consideration of this application. The Nationally Significant Infrastructure Proposal (NSIP) process makes provision for dealing with such circumstances where third party land is required to deliver an NSIP project. There are provisions within the NSIP Development Consent Order (DCO) process to enable the land required to deliver the bridge to be delivered. As will be noted in the response above from the Consenting Manager for the third crossing (paras. 4.68-4.72) discussions are currently taking place with the landowner who would be entitled to compensation, whether the land required for the scheme is secured by agreement, or by the use of compulsory acquisition powers, which the DCO may include. Therefore if this planning application is approved it would not affect the proposed third crossing process at all.
- 7.26 As a precautionary measure Counsel advice has been obtained as to whether, should planning permission for this application be granted, the Council would be liable to pay compensation in view of the proposed third crossing affecting the application site. Counsel has advised as follows:
- 7.27 *Having reviewed the statutory scheme I consider that were WDC to grant permission for the instant application the applicants would not be able to serve either a blight notice or purchase notice on WDC. With regards to blight notices, although there is a possibility that other parts of the statutory test may be met by the applicants, WDC is not the appropriate authority under the statute. Therefore, were the applicants minded to serve a blight notice it would be on SCC rather than WDC.*
- 7.28 *Turning to purchase notices, I consider that the applicants would be unlikely to be able to demonstrate that the Site is incapable of beneficial use. The site currently benefits from an extant planning permission for warehouse development, the current application is for warehouse development and some other uses. These are beneficial uses to which the Site could be put. If and when a DCO is granted to SCC to build the third crossing, this would then be a beneficial use to which the site could be put.*
- 7.29 Counsel advice has confirmed that there would be no liability on the Council should this application be approved.

8 CONCLUSION

- 8.1 An extant planning permission exists on the site for 3,856 sq.m of retail warehouse floorspace which was granted on appeal. This application proposes retail floorspace of 1,268 sq.m although the retail floorspace across the whole site is increased by only 617 sq.m comprising a drive-thru restaurant and 3 small pod units. Given that there is an existing planning permission on the site the additional retail floorspace proposed is not considered to have a harmful impact upon the town centre and it has been demonstrated

that there are no sequentially preferable sites that are suitable and available for the proposed development.

- 8.2 The site is allocated for employment purposes by Policy SSP9 of the AAP. However as the site benefits from planning permission for retail use it is not considered appropriate to refuse this application on the basis that it is contrary to Policy SSP9 particularly as it is likely that there is still an oversupply of employment land in the District.
- 8.3 The site is a potential landing point for the third crossing of Lake Lothing. However this is not a material consideration in the determination of this application as there is no firm proposal for the third crossing and as the planning consent for retail use exists. When land is required for the bridge it can be secured either by agreement with the landowner or by the use of NSIP Compulsory Acquisition powers.
- 8.4 Given the existing retail planning permission on the site it is considered that there are no grounds for refusing this application. Approval of the application is therefore recommended.

9 RECOMMENDATION

9.1 That permission be granted subject to the following conditions:

1. a) Application for approval of any reserved matters must be made within three years of the date of this outline permission and then

b) The development hereby permitted must be begun within either three years from the date of this outline permission or within two years from the final approval of the reserved matters, whichever is the later date.

Reason: To comply with section 92 of the Town and Country Planning Act 1990.

2. Details relating to the layout, scale, appearance, access and landscaping of the site (the "reserved matters"), shall be submitted to and approved by the Local Planning Authority before any development is commenced and the development shall be carried out as approved.

Reason: To comply with Sections 91 and 92 of the 1990 Act.

3. The development hereby permitted shall be carried out in accordance Drwg. Nos. 8449-P09C and 8449-P12E received 14 November 2016 and in compliance with any conditions imposed by the Local Planning Authority.

Reason: To secure a properly planned development.

4. The retail floorspace in Unit 9 shown on Drwg. No. 8449-P12E shall not be used for any purpose other than for the sale of the following bulky goods: DIY and improvement products for the home; garden products; furniture and carpets and floor coverings.

Ancillary goods and services shall not occupy more than 10% of the internal floorspace in the unit.

Reason: In order to protect the vitality and viability of the town centre.

5. Units 6, 7 and 8 shown on Drwg. No. 8449-P12E shall be used for Class A1, A3 and A5 purposes. The Class A1 element permitted shall only be for the sale of cold food for consumption off the premises. No other Class A1 use permitted under the Town and Country (Use Classes) Order 1987 (as amended) is permitted.

Reason: In order to protect the vitality and viability of the town centre.

6. No part of the development shall be commenced until details of the proposed access have been submitted to and approved in writing by the Local Planning Authority. The approved access shall be laid out and constructed in its entirety prior to any other part of the development taking place. Thereafter the access shall be retained in its approved form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

7. No part of the development shall be commenced until details of a cycleway/footway is provided from the development to connect the existing footway on the south side of Denmark Road have been submitted to and approved in writing by the Local Planning Authority. The approved footway shall be laid out and constructed in its entirety prior to occupation of the properties. Thereafter the access shall be retained in its approved form.

Comments: A footway should be a minimum width of 1.8m.

Reason: To ensure that the footway is designed and constructed to an appropriate specification and made available for use at an appropriate time in the interests of highway safety.

8. Before the development is commenced details of the areas to be provided for disabled car parking provision and secure cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for parking and manoeuvring of vehicles.

9. Before the access is first used visibility splays shall be provided in accordance with details previously approved in writing by the Local Planning Authority and thereafter shall be retained in the approved form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 no

obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.

10. Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway.

11. Development shall not begin until a scheme for the provision of fire hydrants within the site has been submitted to and approved in writing by the local planning authority. The fire hydrants shall be installed in accordance with the approved details before the development is first brought into use.

Reason: In the interests of safety.

12. Unless otherwise agreed by the Local Planning Authority, development other than that required to be carried out as part of an approved scheme of remediation must not commence until conditions 13 to 16 have been complied with. If unexpected contamination is found after development has begun, development must be halted on that part of the site affected by the unexpected contamination to the extent specified by the Local Planning Authority in writing until condition 16 has been complied with in relation to that contamination.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

13. An investigation and risk assessment, in addition to any assessment provided with the planning application, must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme are subject to the approval in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report is subject to the approval in writing of the Local Planning Authority. The report of the findings must include:

- (i) a survey of the extent, scale and nature of contamination;
- (ii) an assessment of the potential risks to:
 - human health,

- property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archaeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

14. A detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

15. The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works.

Following completion of measures identified in the approved remediation scheme, a verification report (referred to in PPS23 as a validation report) that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval in writing of the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

16. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 13, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 14, which is subject to the approval in writing of the Local Planning Authority.

Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 15.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

17. Before the development hereby permitted commences a scheme shall be agreed with the local planning authority which identifies all potential noise sources (especially any fixed plant source as coolers, heaters, extractors, air conditioning etc.), details their predicted acoustic performance and specifies the provisions to be made for the control of noise emanating from the site. Any and all approved noise mitigation measures must be implemented prior to any occupation or use of the approved development.

Reason: In the interests of residential amenity

18. Before the development hereby permitted commences a scheme shall be agreed with the local planning authority which identifies all potential sources of odour, predicts and assesses odour emissions and specifies the provisions to be made for the control of odours emanating from the site. Any and all approved odour mitigation measures must be implemented prior to any occupation or use of the approved development.

Reason: In the interests of residential amenity.

19. Concurrent with the first reserved matters application a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
- a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or $2l/s/ha$ for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;

- e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
- f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
- g. Details of who will maintain each element of the surface water system for the life.

The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

20. Concurrent with the first reserved matters application details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

21. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register

22. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.

23. Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: Piling or any other foundation designs using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.

BACKGROUND INFORMATION:

See application ref: DC/16/3844/OUT at
www.waveney.gov.uk/publicaccess

CONTACT

Phil Perkin, Principal Planning Officer, (01502) 523073,
philip.perkin@eastsoffolk.gov.uk