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## Appeal Decision

Hearing held on 15 February 2023 and 19 July 2023

Site visit made on 16 February 2023

**by M Woodward BA (Hons) MA MRTPI**

**an Inspector appointed by the Secretary of State**

**Decision date: 25<sup>th</sup> October 2023**

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**Appeal Ref: APP/D3505/W/22/3306364**

**First Grade Recycling Systems Ltd, Ivory House, Crossways, Cockfield, Suffolk IP30 0LN**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
  - The appeal is made by Firstgrade Recycling Systems Limited against the decision of Babergh District Council.
  - The application Ref DC/20/03116, dated 23 July 2020, was refused by notice dated 27 April 2022.
  - The development proposed is the erection of new workshop building with the existing access to the site from the A1141 upgraded.
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### Decision

1. The appeal is dismissed.

### Application for Costs

2. An application for a full award of costs was made by Firstgrade Recycling Systems Limited against Babergh District Council. This is the subject of a separate Decision.

### Preliminary Matters

3. I have taken the description of the development from the appeal form in the interests of conciseness, as it represents a consolidated version of the description detailed on the application form.
4. The Council previously resolved to grant planning permission for the development<sup>1</sup>. However, the Council's decision was subsequently quashed at the High Court by Consent Order<sup>2</sup>. The planning application was reconsidered by the Council and subsequently refused. It is now the subject of this appeal.
5. The emerging Babergh and Mid Suffolk Joint Local Plan 2018-2037 (eJLP) has advanced since a decision on the planning application was made. The eJLP Inspector's report confirms that it has been found sound, subject to modifications. Comments have been made by the main parties on the implications of the eJLP in relation to this appeal. In accordance with paragraph 48 of the National Planning Policy Framework (the Framework), I

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<sup>1</sup> Babergh planning application reference - DC/20/03116

<sup>2</sup> Claim no. CO/1429/2021

address the weight to be given to relevant policies in the eJLP later in my decision.

6. Whilst the Council did not raise any concerns relating to the scheme's impact on the character and appearance of the area, several interested parties did. It is a substantive matter that constitutes a 'main issue' for the reasons set out in my decision. All parties were informed of this prior to the Hearing, and it was discussed during the event.
7. At the end of the second day of the Hearing several matters remained outstanding. Therefore, and in agreement with the main parties, the Hearing was formally closed with outstanding matters addressed by the 'written representations' procedure. The main parties provided supplementary statements of case and correspondence relating to suggested planning conditions, which I have taken into account in reaching my decision. I am satisfied that interested parties had sufficient opportunity to comment on the scheme throughout the appeal process and the change in procedure was not prejudicial to their interests.
8. Finally, a revised Framework was published by the government after the submission of the appeal<sup>3</sup>. It does not raise any new considerations in relation to this appeal.

## **Main Issues**

9. The main issues are whether the site is a suitable location for the proposed development having regard to local and national planning policy, accessibility, need, and the character and appearance of the surrounding area.

## **Reasons**

### Location

10. Policy CS2 of the Babergh Core Strategy & Policies 2011-2031 (2014) (Core Strategy) defines the settlement pattern for the District over the plan period. The nearest settlement to the appeal site listed in Policy CS2 is Cockfield, a Hinterland Village. This village is made up of four separate defined settlement boundaries known as Built-Up Area Boundaries (BUAB), as defined by the Babergh Local Plan Alteration No.2 2006 (Local Plan), the nearest of which is Cross Green. In relation to Policy CS2, the appeal site lies in the countryside, and the policy states that development in the countryside will only be permitted in exceptional circumstances, subject to a proven justifiable need.
11. Policy CS11 of the Core Strategy deals with development relating to Core and Hinterland Villages. Each of the Core Villages include Hinterland Villages within their catchment, collectively referred to as 'functional clusters'.
12. Functional clusters are intended to be the focus of growth, with settlements within them operating together, allowing for shared service provision between them. Furthermore, Policy CS11 adopts a flexible approach and does not preclude development beyond the defined settlement boundaries. The SPD<sup>4</sup> clarifies that development does not have to be 'in' the settlement to be supported but, rather, what is important is the nature of the relationship between a proposal and the existing pattern of development. In this regard,

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<sup>3</sup> Dated September 2023

<sup>4</sup> Rural Development & Core Strategy Policy CS11 Supplementary Planning Document 2014

Policy CS11 lists a range of criteria which assist in determining whether or not a proposal aligns with the strategy for Hinterland Villages.

13. In terms of the appeal site's relationship with the existing pattern of development for that settlement, it is physically detached from any of the settlement boundaries which go to make up the functional cluster. The closest BUAB, Cross Green, lies in excess of 300m from the site. Also, the land on either side of the road in between the appeal site and Cross Green is mainly open countryside and the appeal site is appreciably separate from the settlement.
14. I recognise, however, that the appeal site is not isolated from other development. It lies within a cluster of industrial/agricultural buildings and premises, along with a few residential properties. However, whilst the Core Strategy clarifies that small groups of dwellings and hamlets will fall within functional clusters, it goes on to say that such groups are classified as countryside<sup>5</sup>. Therefore, despite the proximity of other buildings and properties, I do not consider this site to be well related to the existing pattern of development comprising the defined settlement.
15. The appellant's business has been established for some time, specialising particularly in the design, manufacture and installation of machinery for the waste processing and recycling industry. The appeal site lies immediately to the south of the premises currently occupied by the appellant (Ivory House). I saw first-hand on my site visit the operational constraints associated with the layout and buildings relating to the existing premises. I do not dispute that the operations undertaken have outgrown their current facilities and larger, modern bespoke facilities would allow the business to grow and fulfil its potential. Be that as it may, I am not satisfied that the scheme's manufacturing use would be dependent on a countryside location.
16. The appellant points to the fact that the proposal would provide opportunities for some residents to work close to their home. However, staff currently commute an average distance of 10.95 miles to the existing premises<sup>6</sup>. Therefore, whilst some staff appear to reside in nearby settlements, a large number do not. Consequently, the existing business does not appear to provide significant direct employment for those residing in Cockfield or the wider functional cluster.
17. I was told by the appellant that at least one young person is keen to secure a local apprenticeship, which the proposed scheme would make possible. I also appreciate that the new jobs created by the larger premises proposed would provide employment opportunities for those residing in local settlements and rural areas. However, the same could be said for many types of employment scheme in this location, and there is no substantive evidence to suggest that the proposal would provide significant opportunities for local people specifically.
18. The appellant's existing business also appears to have established good links with a range of local suppliers and businesses. This includes an adjacent engineering firm which provides goods and support. I do not doubt that the existing business contributes to the local economy and functional cluster, driven also by the purchase of local goods and services by the staff employed.

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<sup>5</sup> Paragraph 2.8.6 of the Core Strategy

<sup>6</sup> HD3

The proposal, which would increase the existing manufacturing output, and result in an increase in employment, would further contribute to local business and services. However, none of these suppliers appear to provide services which could not be replicated by the same or different suppliers, even if the proposal was located elsewhere in the District or region.

19. In relation to Policy EM20 of the Local Plan, this supports the expansion/extension of an existing employment use, site or premises. I acknowledge that there is nothing to suggest that there would be a physical or functional link between the existing premises and the proposed scheme. However, this is not expressly required by the Policy, the accompanying text of which, in summary, recognises support for the expansion of existing firms/employers. Therefore, the proposed relocation would facilitate the expansion of an existing employment use which would in turn create additional jobs, in accordance with the thrust of Policy EM20<sup>7</sup>.
20. Policy EM19 of the Local Plan supports high technology employment provision. Even if I was to accept the appellant's assertion that this applies to the type of development proposed here, and provides unequivocal support for the scheme, it is nevertheless the case that this policy, along with Policy EM20, should be considered as part of the overall development plan, which should be considered as a whole. I return to this in the 'planning balance' section.

### *Accessibility*

21. There are bus stops close to the appeal site which are serviced fairly regularly, and the site is well connected to the road network to facilitate travel by private car or bus. I have no reason to dispute the appellant's assertion that travel to work distances to the existing premises are shorter than the national or regional average.
22. However, as I experienced on my site visit, pedestrian access is constrained by intermittent footway provision in between the appeal site, Cockfield and other nearby settlements. A lack of street lighting in the vicinity of the appeal site combines to make this an unattractive destination to reach solely on foot.
23. I am aware that some existing employees travel to work by bicycle. However, even though the national cycle route runs through Cockfield, it is segregated from the appeal site. Overall, the site lacks connectivity by a network of segregated cycle lanes or dedicated cycle routes which, along with the poorly lit local rural roads, limit its accessibility by bicycle.
24. I am conscious that the appellant has sought to address the need to travel by car and sustainability matters, which includes proposed charging facilities for electric cars along with cycle parking, and a travel plan which could be secured by condition in the event the appeal was to be allowed. Nevertheless, the effectiveness of these measures would be constrained by the site's rural location and the local transport network which is not conducive to supporting safe and convenient access by non-motorised means. That is not to say that the site is inherently inaccessible, being close to main roads which support safe HGV access. However, there are shortcomings in terms of the appeal site's relative accessibility for staff, commensurate with its rural location.

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<sup>7</sup>The Council's economic development team also support the proposal

## Need

25. I turn now to the appellant's assessment of alternative sites<sup>8</sup>. Other than a brief written analysis of each of the site's put forward, the assessment includes limited information on the site identification process. Furthermore, the assessment lacks detailed individual site appraisal and evaluation, and no details such as plans showing the sites and their constraints are included.
26. In terms of the search parameters, this is partly predicated on a 15-mile search radius of the appellant's existing premises. I was told that this was based on current contractual arrangements with existing staff. However, there is no evidence before me indicating that these contracts could not be varied. Therefore, I do not accept that this can be relied on as a definitive search radius.
27. Furthermore, the distance from existing premises should not necessarily be a determining factor in relation to overall site suitability. The submitted assessment contains no detailed analysis concerning the relationship of potential sites with the market and existing or potential suppliers. In addition, details of the type of jobs which would be generated by the scheme relative to the employment market and labour supply has not been analysed. Therefore, whilst the appellant states that alternative sites would increase the travel to work distance for existing employees, it is not clear whether alternative sites would be more advantageously located in order to access the workforce necessary to support growth. When considered along with the potential to access sustainable modes of transport, this may make sites beyond the 15-mile radius more attractive propositions. In summary, the alternative site assessment falls short of a comprehensive, detailed and independent analysis of suitable alternatives.
28. Notwithstanding this, even if I was to accept that the majority of those alternative sites contested by the main parties are unsuitable, there are two alternatives in particular which leads me to question the appellant's assertion that suitable alternatives do not exist.
29. Firstly, in respect of *Haughley Park*, the appellant states that the existing building on site is not suitable due to its dimensions and the lack of option to purchase. However, I was told by the Council that this building occupies a much wider site, which may offer wider opportunities for development. Whilst the appellant confirmed that enquiries had been made about the wider site, these were verbal exchanges, and no written records have been provided. Therefore, I do not know the precise details of these exchanges, nor the precise response of the landowner concerning availability and suitability. Furthermore, whilst it was put to me that part of the wider site is constrained by overhead power lines, I do not know if these would be a significant constraint to the development. In summary, the appellant's assessment contains no detailed information relating to the site layout and constraints and any enquiries made lack transparency. I am not satisfied that the merits of this site have been fully explored to demonstrate that it would be unsuitable.
30. In respect of *Suffolk Business Park*, another contested site, this appears to be a phased scheme for a range of commercial uses, currently under construction. The appellant asserts that phase 1 of zone 3 of this scheme would not be

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<sup>8</sup> HD10

suitable and phase 2 may not come forward for a long time and will be suitable only for smaller units. However, this is not corroborated by detailed written evidence or a comprehensive analysis of site suitability.

31. The appellant informed me during the Hearing that they had made enquiries with the landowner regarding the site's potential to accommodate the proposal, but no response had been received. I have no written records of the enquiry made, nor the extent to which further attempts were made to engage with the landowner. The appellant also points to uncertainty concerning the imminent availability of the site. However, the appellant's business is already established at an existing premises, and no substantive evidence has been provided to suggest that the future prospects of the business rely on imminent relocation.
32. I note that no suitable alternative sites in the local area have been suggested by the Council. However, as per Policy CS2 of the Core Strategy, the onus is on the appellant to evidence a proven justifiable need for development in the countryside.
33. The appellant also points to a survey commissioned by Cockfield Parish Council within which almost half of the respondents considered that local business and employment opportunities were essential to maintaining the community<sup>9</sup>. I deal with the associated employment benefits in the 'planning balance' but, as I have already identified, there is no 'need' for this development in the local area.
34. Finally, even accepting the appellant's assertion that the scheme's proposed location would be better served by public transport and the road network than an alternative site adjacent to the BUAB, for the reasons I have set out, there may be other sites in more suitable locations across the wider region.

#### Character and appearance

35. The appeal site comprises a parcel of grassland which includes an existing track which routes north to south connecting the Ivory House premises to the A1141. Whilst some land within the site has been used for the storage of equipment for a considerable period of time, a large part of the site comprises land which has not been previously developed.
36. Trees and vegetation occupy the northern and southern boundaries, with the east and west boundaries being largely open. The site lies close to the road and within an area of existing residential, industrial and agricultural buildings and uses. These urban features diminish the site's rurality, but they are situated loosely around the site in a rather uncoordinated manner such that the countryside is readily visible and appreciable. As such, the appeal site retains a verdant appearance and displays an open rural character, making a notable contribution to the surrounding countryside.
37. The proposal would comprise a large building, covering an area of approximately 1100m<sup>2</sup>, along with an external storage area and car park. It would be a dominant feature, incongruous in views from the junction of the A134 and A1141 and its immediate surroundings. Whilst its design and appearance would be in keeping with several other buildings and premises nearby, it would nevertheless exhibit a functional appearance. When combined with its overall footprint, volume and area of surrounding hardstanding, it

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<sup>9</sup> HD1

would represent a large expanse of built form and a permanent encroachment into the countryside.

38. The proposed landscaping on the southern and eastern boundaries would progressively reduce obtainable views of the development over time, although it would not completely address the resultant encroachment and loss of openness. I also generally concur with the findings of the submitted LVIA<sup>10</sup>, in particular in relation to the limited impact on the wider landscape character, and the limited visual effects of the scheme when viewed from public footpaths, and mid to long distance views. Indeed, the scheme would be prominent mainly from the site's immediate surroundings.
39. Nevertheless, as a result of the proposal's overall scale and location, it would be a permanent encroachment into an area of countryside, diminishing the contribution the site makes to its verdant surroundings, thus undermining its intrinsic character. Taking the foregoing mitigating factors and context into account, I conclude that there would be moderate harm to the character and appearance of the area.

#### *Overall findings on locational suitability*

40. The proposal would be located in the countryside and both outside of, and poorly related to, existing defined settlements. Taking into account a broader interpretation of 'local', so as to include settlements within the functional cluster and areas immediately adjoining them<sup>11</sup>, whilst I accept that the proposal would bring about clear economic benefits, I am not satisfied that a need for the development in this specific location has been demonstrated, nor that suitable alternatives have been properly explored. Consequently, the proposal would be contrary to Policies CS2 and CS11 of the Core Strategy in this respect.
41. Whilst good access to bus services goes some way to contributing to the site's accessibility, the rural location and poor pedestrian and cycle connectivity reinforces the site's poor relationship with existing settlements. The scheme would fail to minimise the need to travel by car conflicting with the hierarchy advocated by criterion xviii) of Policy CS15 of the Core Strategy.
42. Whilst the impact on the character and appearance would not be significant in this case given the context, there would nevertheless be moderate harm, this underlining the site's poor relationship with the settlement and its surroundings, contrary to Policy CS11 of the Core Strategy. There would be overall conflict with Policy CS3 of the Core Strategy insofar as the proposal would not be appropriate in scale and character to its locality. For these reasons, the proposal would also conflict with criterion i) and ii) of Policy CS15 of the Core Strategy. Overall, the proposal would conflict with the Council's development strategy for Babergh and its countryside location is not justified.
43. In relation to emerging policies, I find conflict with Policy SP05 of the eJLP as, despite the proposal offering to make provision for skills and training packages, it would not be on a strategic employment corridor, would not be mainly on previously developed land, nor would it be sensitive to its surroundings.

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<sup>10</sup> Landscape and Visual Appraisal by Southern Ecological Solutions dated October 2021

<sup>11</sup> Generally, in accordance with the approach advocated by *R (East Bergholt Parish Council) v Babergh DC & Aggett* [2016] EWHC 3400 (Admin) – HD7

44. Whilst Policy SP03 of the eJLP takes a flexible approach to allowing development outside settlement boundaries, the scheme's countryside location is not justified in this case for the reasons set out, contrary to this policy. Even taking into account any support offered by Policy LP09, the proposal would not constitute sustainable economic growth when considering these policies together. Given the very advanced stage of the eJLP, conflict with these policies carries significant weight.

### **Other Matters**

45. The imposition of a planning condition to make the development personal to the appellant would not meet the test of necessity, as it has not been demonstrated that there is a need for the development in this location.

### **Planning Balance**

#### *Most important policies*

46. In accordance with paragraph 219 of the Framework, development plan policies should not be considered out-of-date simply due to their age. Primarily, due weight should be given to them in accordance with their degree of consistency with the Framework.
47. The most important policies for determining this appeal are Policies EM19 and EM20 of the Local Plan and Policies CS2, CS3, CS11 and CS15 of the Core Strategy. There is no dispute between the main parties that Policies EM19 and EM20 of the Local Plan and Policy CS15 of the Core Strategy are consistent with the Framework and are not out of date.
48. Policy CS2 of the Core Strategy is out of step with the Framework as it only permits development in the countryside in exceptional circumstances, subject to a proven justifiable local need. This test is not a requirement of the Framework. However, the wider settlement pattern strategy advocated by Policy CS2 is broadly consistent with the Framework, which seeks to focus development in the most sustainable locations. Therefore, I attribute moderate weight to this policy due to its partial consistency with the Framework.
49. Policy CS3 is not out of date. The appeal decision referred to by the Council concerns housing strategy<sup>12</sup> and circumstances which have limited parallels with the appeal scheme. The policy reflects the Framework in relation to economic growth.
50. In respect of Policy CS11 of the Core Strategy, it adopts a flexible approach to development in rural areas. The overall approach to the policy is to support development in a hierarchical manner, with the priority given to sites within or close to urban areas, followed by Core Villages and Hinterland Villages.
51. To my mind this policy generally accords with Paragraph 85 of the Framework, which states that sites in rural areas *may* (my emphasis) be required adjacent to or beyond existing settlements, encouraging sites that, amongst other things, are well-related to existing settlements. The use of the word 'may' in paragraph 85 aligns with the criteria-based approach of Policy CS11 which requires development in rural areas to be justified, with the overarching aim of encouraging sustainable schemes in rural areas which relate well to existing

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<sup>12</sup> HD12

settlements. As such, I am satisfied that Policy CS11 is consistent with the Framework.

52. The appellant states that the employment needs assessment, which underpinned the development plan, is out of date. Be that as it may, I do not accept that this renders all related policies out of date, particularly as a detailed analysis of the employment needs assessment does not form part of the appellant's case. The development plan's emphasis on focusing economic growth in sustainable locations is in general accordance with the Framework's overall emphasis on promoting sustainable economic growth.
53. I conclude that only one of the most important policies is out of date (Policy CS2). Taken as a whole, the 'basket' of most important policies is not considered out of date for the purposes of this appeal. As a result, the 'tilted balance' test set out in paragraph 11d) of the Framework is not engaged in this case.

### *Final Balance*

54. Given the site's countryside location and poor relationship with existing defined settlements, and that no justifiable need for the type of manufacturing scheme proposed has been demonstrated taking into account alternative sites, I attribute significant weight to the conflict with Policy CS11 of the Core Strategy. There would also be significant conflict with the spatial strategy set out in Policy CS2, although moderate weight is attached to the policy conflict overall due to its outdatedness.
55. Policy CS15 of the Core Strategy relates to implementing sustainable development and itself requires a range of environmental, economic and social factors to be considered, not all of which are applicable to this scheme. I have identified conflict with criterion relating to the local character and appearance of the area and its rural location, as well as its relative accessibility.
56. Policy CS3 of the Core Strategy is supportive of proposals that design or produce low carbon goods, as would be the case here. It would also contribute to the local economy through job creation and the support of local services. However, this is subject to proposals which are appropriate in scale, character and nature to their locality, and I find overall conflict with the policy as a result of the harm to the character and appearance I have identified.
57. Compliance with Policies EM19 and EM20 of the Local Plan, which relate to employment generating schemes of the type proposed here, weigh in favour of the scheme. There is also support contained within Policy CS15 of the Core Strategy for, amongst other things, proposals which create jobs and boost the local economy. I recognise that the proposal would meet other criteria within Policy CS11, namely that it would create employment opportunities and support local services. However, compliance with these policies should be considered in the context of the District's overall spatial strategy.
58. In this respect, taken together, development plan policies make it clear that the focus should be on directing new employment development to sites in accordance with the settlement hierarchy. This is a consideration of substantial weight. The appeal site falls outside the areas where the development plan intends to focus future growth, and its countryside location is not justified. Whilst acknowledging that policies pull in different directions, weighing both in

support and against the proposal, I find conflict with the development plan taken as a whole.

59. In relation to the Framework, the scheme would not be a form of sustainable economic growth, would not be well related to existing settlements, a large part of the site is not previously developed, and there is no justification for the proposed location. Therefore, the proposal would conflict with paragraphs 84 and 85 of the Framework.
60. Turning to benefits, the development would create approximately 24 full time equivalent jobs and provide opportunities for local people both during the construction phase, and permanent high skilled jobs relating to the use. It would also ensure the retention of a significant number of existing jobs. There would be both direct and indirect benefits to the local and district wide economy and indirect support of existing jobs. In accordance with paragraph 81 of the Framework, these considerations carry significant weight in favour of the scheme.
61. Furthermore, the proposal would provide high quality modern and energy efficient facilities, including electric vehicle charging, a travel plan and scheme to encourage cycling. The manufacturing process would output specialist equipment which would assist in reducing the carbon emissions associated with the waste recycling industry. The site has limited current ecological value and the scheme would introduce additional tree planting and overall biodiversity benefits and net gain. These environmental benefits overall attract moderate weight in favour.
62. The proportion of prospective future employees residing in the local area is unclear. Therefore, whilst the proposal's potential to increase the working population would help sustain local services and facilities and diversify the population, these social benefits carry limited weight.
63. When taken together, these benefits are not sufficient to outweigh the harm identified and conflict with the development plan.
64. My decision has been reached notwithstanding the relevance of the eJLP policies. For completeness, I also find conflict with the eJLP policies, and given the advanced stage of the eJLP, this conflict would also weigh significantly against the appeal.

## **Conclusion**

65. The appeal proposal would conflict with the development plan when read as a whole. There are no material considerations of sufficient weight, including the Framework, which indicate that a decision should be taken other than in accordance with the development plan. Therefore, the appeal is dismissed.

*M Woodward*

INSPECTOR

## **APPEARANCES**

### **FOR THE APPELLANT:**

|                    |                      |
|--------------------|----------------------|
| Deborah Sharples   | Advocate             |
| Chris Board        | ABC Planning         |
| Rachel Bodium CMLI | Landscape Consultant |
| Alan Valentine     | Appellant            |
| Mr Bramall         | Appellant            |

### **FOR THE LOCAL PLANNING AUTHORITY:**

|                 |                            |
|-----------------|----------------------------|
| Dr Sam Fowles   | Advocate                   |
| Elizabeth Flood | Principal Planning Officer |
| Harry Goodrich  | Senior Planning Officer    |
| Simon Bailey    | Enforcement                |
| Steven Stroud   |                            |
| Georgia Tarbuck |                            |

### **INTERESTED PARTIES:**

|                       |                                                     |
|-----------------------|-----------------------------------------------------|
| Mr Hannaford          | Local resident                                      |
| Barry Everitt         | Local resident                                      |
| Ms Kidd               | Cross Green resident                                |
| Barbara Macdonald     | Cross Green resident                                |
| Amanda Glover         | Cross Green resident                                |
| Peter Atkinson        | Cross Green resident                                |
| Clive Arty            | Lavenham resident                                   |
| Michael Wells         | Cross Green Fishery                                 |
| Mr Evans              | Cross Green Fishery owner                           |
| Michael Wright        | Cross Green resident                                |
| Alan Cousins          | Cross Green resident                                |
| William Nickson       | Local resident                                      |
| Paul Dodd             | Local resident                                      |
| Mary Atkinson         | Local resident                                      |
| Janet Atkinson        | Local resident                                      |
| Ian Levitt            | Local resident                                      |
| Mr Dyer               | Local resident                                      |
| Cllr Margaret Maybury | Ward councillor                                     |
| David Whipps          | Consultant acting on behalf of Mr and Mrs Hannaford |

**DOCUMENTS SUBMITTED DURING THE HEARING:**

HD1 - Parish of Cockfield Babergh District – North Cosford Village Growth & Development Survey Report 2014  
HD2 – E1418a – Building Suitability (spreadsheet)  
HD3 – Employees Travel to Work  
HD4 – Details of local businesses  
HD5 – All local suppliers  
HD6 – All local suppliers zoomed  
HD7 – R. (on the Application of East Bergholt Parish Council) v Babergh District Council v Paul Bernard Aggett, Sarah Jane Aggett [2016] EWHC 3400 (Admin)  
HD8 – R. (on the application of Clive Gare) v Babergh District Council v Lewis Morgan Limited [2019] EWHC 2041 (Admin)  
HD9 - Statement of Common Ground dated 23rd April 2023  
HD10 - Alternative sites table 28th April 2023  
HD11 - Appellant comments on emerging policy document  
HD12 - SoS Decision - APP/D3505/W/18/3214377  
HD13 - Emerging Joint Local Plan policy SP05  
HD14 - Emerging Joint Local Plan 'Strategic Transport Corridors'  
HD15 - Emerging Joint Local Plan policy SP03  
HD16 - Decision notice ref - DC/21/00407  
HD17 - An article relating to *workers' commuting experience*  
HD18 - Representations on emerging Joint Local Plan policies LP09 HD18  
HD19 – Further representation on emerging Joint Local Plan  
HD20 - Joint Local Plan Further Hearings Summary Officer Responses - Matter A