Minerals and Waste Local Plan Publication Stage Representation Form

Page 1: Suffolk Minerals and Waste Local Plan Publication Stage Representation

Q1. Please state if you are responding:

As an agent

Q2. Personal Details:

No Response

Q3. Agent's Details:

<table>
<thead>
<tr>
<th>Title</th>
<th>Mr</th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td>Philip</td>
</tr>
<tr>
<td>Last Name</td>
<td>Rowell (received via email)</td>
</tr>
<tr>
<td>Job Title</td>
<td>Director</td>
</tr>
<tr>
<td>Organisation</td>
<td>Adams Hendry Consulting Limited</td>
</tr>
<tr>
<td>Address Line 1</td>
<td>40-43 Jewry Street</td>
</tr>
<tr>
<td>Address Line 2</td>
<td>Winchester</td>
</tr>
<tr>
<td>Address Line 3</td>
<td>Hampshire</td>
</tr>
<tr>
<td>Address Line 4</td>
<td>N/A</td>
</tr>
<tr>
<td>Post Code</td>
<td>SO23 8RY</td>
</tr>
<tr>
<td>Telephone Number</td>
<td>N/A</td>
</tr>
<tr>
<td>Email address</td>
<td>ABP - East Anglian Ports</td>
</tr>
</tbody>
</table>

Q4. To which part of the Local Plan does this representation relate?

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>5.42 &amp; 5.43</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy</td>
<td>MP9</td>
</tr>
<tr>
<td>Policies Map</td>
<td>Insets W1</td>
</tr>
</tbody>
</table>
Q5. Do you consider the Local Plan is

<table>
<thead>
<tr>
<th>(1) Legally compliant</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>(2) Sound</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>(3) Complies with the Duty to co-operate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Q6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The submission draft local plan, through policies MP9 and WP18, seeks to safeguard the following specific sites within the statutory Ports of Lowestoft and Ipswich for particular minerals and waste purposes, namely: Port of Ipswich • Cliff Quay (Site ref W1 and AP3 – Wharf and Asphalt Plant); • West Bank Waste Transfer Station (Site Ref WTP4 – Waste Transfer Station); and • West Bank Terminal (Site ref W4 and R4 – Wharf and Rail Head). Port of Lowestoft • Hamilton Dock (Site W2 – Wharf), and • North Quay (Site W3 – Wharf) This is an unsound position, for the reasons now summarised. The two Ports of Lowestoft and Ipswich are owned and operated by Associated British Ports (ABP). For the purposes of planning matters, ABP is a statutory undertaker (as defined in section 262 of the Town and Country Planning Act 1990) and the port land owned by ABP constitutes operational land of a statutory undertaker (as defined in section 263 and 264 of the 1990 Act). As such, the two ports benefit from extensive permitted development rights that enable port operations to react to the needs of the market in an efficient and timely way. The Ports are, therefore, dynamic – and often fast changing – land uses. The Ports need to be able to react to the needs of the market in this way – and, therefore, rely upon their extensive permitted development rights - because of the nature of the industry within which they operate. This is best explained by having regard to the Government’s policy for ports, which is contained in the National Policy Statement for Ports (DIT, 2012) (NPSfP) (a national policy document to which the Local Plan should have regard). Amongst other things, the NPSfP makes it clear that it is Government policy to “allow judgements about when and where new developments might be proposed to be made on the basis of commercial factors by the port industry or port developers operating within a free market environment” (paragraph 3.3.1). This position – which is a continuation of the ‘market led’ ports policy position which has been in place for some time – is further emphasised in the context of the policy identifying that an element of overall need for port infrastructure is that capacity is provided in the right place. In respect of this matter the NPSfP highlights that it is not for public bodies such as Government to dictate where port development and capacity should be provided (paragraph 3.4.12). In terms of the need for capacity and development, the NPSfP makes it clear that this depends not only on demand, but also on the need to retain flexibility that ensure that port capacity is located where it is required, and on the need to ensure effective competition and resilience in port operations. In addition to the policy context within which the Ports of Lowestoft and Ipswich function, it is also necessary to understand the legislative context. In addition to being a statutory undertaker, ABP is also the statutory harbour authority for the two Ports and has to operate the two ports in accordance with both general and port specific legislation. Of note is that both ports are required to operate in accordance with an aspect of legislation commonly known as the ‘open port duty’. This duty is founded in section 33 of the Harbours, Docks and Piers Clauses Act of 1847, which states: "Upon payment of the rates made payable by this and the special Act, and subject to the other provisions thereof, the harbour, dock, and pier shall be open to all persons for the shipping and unshipping of goods, and the embarking and landing of passengers." In simple terms, the duty is one that provided that the trade is legal and the necessary rates and dues are paid, the two Ports must be open to all for the shipping and unshipping of goods and the movement of passengers. Against this – albeit very brief – background summary, it is clear that it is unsound for the Council through the emerging Minerals and Waste plan to seek to safeguard land and facilities within these Ports for a particular minerals or waste related trade or use, whilst those sites form and remain part of a statutory port estate. Such safeguarding could only be said to be sound in circumstances where the sites in question were to be sold off or somehow made available by ABP for non-port / port related development. ABP has no intentions to take such steps in respect of the sites in question or any other parts of the statutory Lowestoft and Ipswich port estates. Having said this, however, ABP wishes to make it clear that its concern over the potential safeguarding of sites within its operational port areas does not mean that it is saying the sites in question are necessarily unsuitable for minerals and waste purposes. For example, in respect of Wharf Site W3 within the Inner Harbour area of the Port of Lowestoft, ABP is currently giving active considerations – along with potential customers – to its use for the import of aggregate, a use for which ABP consider there to be a clear demand. However, conversely, there is no prospect – currently or in the foreseeable future - of wharf site W2 within the Port of Lowestoft being
used for a minerals or waste purpose as this is in use for an alternative port related purpose. Having regard to the fact, therefore, that some sites within the two ports may well be used for minerals and waste purposes during the plan period. ABP does welcome and support the aspect of policy MP9 which seeks to ensure that the use of existing or potential sites and facilities – including those existing or potential sites within the two ports - is not adversely impacted upon by other development proposals occurring in proximity to them. ABP further supports the requirement set out in policy MP9 that necessary mitigation - in the form of satisfactory alternative facilities – should be made available by those promoting the development causing the adverse impacts for the handling facility. However, in respect of existing or potential sites and facilities within the operational ports, the protection / mitigation requirements set out in the policy can clearly only be applied in respect of third party non-port developments outside of the port area – and, for the reasons set out, clearly not other port related developments within the port area - or in circumstances where ABP was to somehow dispose of the site in question or make it available to non-port / port related use.

Q7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 5 above where this relates to soundness. (NB Please note that any non- compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy MP9 needs to be amended along the following suggested lines. Additional text is shown in bold italicised text and deleted text is shown crossed through. ‘Policy MP9: Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials When proposals are made which would result in the loss of or might potentially compromise the use of: a) an existing, planned or potential rail head, wharf or associated storage, handling or processing facilities for the bulk transport by rail or sea of minerals, including recycled, secondary and marine-dredged materials, that is not located on operational port land and/or; b) an existing, planned or potential site for concrete batching, the manufacture of coated materials, other concrete products or the handling, processing and distribution of substitute, recycled and secondary aggregate material that is not located on operational port land; applicants will be required to demonstrate to the County Council that those sites no longer meet the needs of the aggregates industry. Where this is not the case, satisfactory alternative handling facilities should be made available by the developer. Development proposals in close proximity to the above minerals related facilities should demonstrate that they would not prejudice or be prejudiced by those facilities. In respect of facilities or potential facilities located on operational port land, the requirements in the preceding paragraphs will only apply in circumstances where: (i) an existing or potential facility on operational port land is potentially impacted upon by a third party non-port related development; and / or (ii) where the statutory port authority sells off the site in question or makes it available for non-port and port related development. Any mitigation required falls on the development that receives planning permission last. District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies MP9 before providing a consultation response. To assist the reader of the Plan, it is also suggested that a paragraph of explanatory text is added after paragraph 5.44 to explain the position further. Wording along the following lines is suggested: ‘5.44 Some facilities of relevance to policy MP9 are located within the statutory Ports of Ipswich and Lowestoft. Having regard to both the national policy of relevance to ports – currently contained within the National Policy Statement for Ports – and the legislative framework within which these ports have to operate it is not possible to safeguard facilities or sites within the ports for a particular minerals or waste use in the same way as it is on other sites. Policy MP9 makes this distinction in respect of the circumstances in which the policy requirements will be applied.’ Finally, and again to assist the reader of the Plan, it is suggested that the sites located on operational port land are distinguished in the list of safeguarded sites provided at Appendix 3 of the Plan. In this way, the reader of the plan can understand which sites the different provisions of policy MP9 apply. It is also necessary for the relevant insets to the policies map (Maps W1 and 11) to distinguish these sites from the others shown. However, site W2 should be deleted from plan W1 as this area, within the Port of Lowestoft operational area, is in active use for other port related activities and there is no prospect - currently or in the foreseeable future – of this site being used for a minerals or waste related purpose.

Q8. SCC Response

No Response
Q9. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

Q10. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

This representation relates to matters of importance. It is important that ABP is able to test and explore the unsoundness of the Local Plan in respect of these matters and to discuss the changes sought in more detail with the Council and Inspector.

Q11. Your details:

<table>
<thead>
<tr>
<th>Name</th>
<th>P Rowell</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date</td>
<td>23 July 2018</td>
</tr>
</tbody>
</table>
This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

<table>
<thead>
<tr>
<th>1. Personal Details*</th>
<th>2. Agent’s Details</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the Agent in 2.</em></td>
<td></td>
</tr>
</tbody>
</table>

**Title**

| Mr |

**First name**

| Philip |

**Last Name**

| Rowell |

**Job Title** (where relevant)

| Director |

**Organisation** (where relevant)

| ABP – East Anglian Ports | Adams Hendry Consulting Limited |

**Address Line 1**

| Old Custom House |

**Address Line 2**

| Key Street |

**Address Line 3**

| Ipswich |

**Address Line 4**

| Suffolk |

**Post Code**

| IP4 1BY |

**Telephone Number & Email Address** (where relevant)

| |
Part B – Please use a separate sheet for each representation

Name or Organisation: Associated British Ports

3. To which part of the Local Plan does this representation relate?

<table>
<thead>
<tr>
<th>Paragraph</th>
<th>Policy</th>
<th>Policies Map</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.42 and 5.43</td>
<td>MP9</td>
<td>Insets W1</td>
</tr>
</tbody>
</table>

4. Do you consider the Local Plan is:

- (1) Legally Compliant
  - Yes [ ] No [ ]
- (2) Sound
  - Yes [ ] No [ ]
- (3) Complies with Duty to co-operate
  - Yes [ ] No [ ]

Please tick as appropriate

5. Please give details of why you consider the Local Plan in not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please use this box to set out your comments.

The submission draft local plan, through policies MP9 and WP18, seeks to safeguard the following specific sites within the statutory Ports of Lowestoft and Ipswich for particular minerals and waste purposes, namely:

**Port of Ipswich**
- Cliff Quay (Site ref W1 and AP3 – Wharf and Asphalt Plant);
- West Bank Waste Transfer Station (Site Ref WTF4 – Waste Transfer Station); and
- West Bank Terminal (Site ref W4 and R4 – Wharf and Rail Head).

**Port of Lowestoft**
- Hamilton Dock (Site W2 – Wharf), and
- North Quay (Site W3 – Wharf)
This is an unsound position, for the reasons now summarised.

The two Ports of Lowestoft and Ipswich are owned and operated by Associated British Ports (ABP). For the purposes of planning matters, ABP is a statutory undertaker (as defined in section 262 of the Town and Country Planning Act 1990) and the port land owned by ABP constitutes operational land of a statutory undertaker (as defined in section 263 and 264 of the 1990 Act). As such, the two ports benefit from extensive permitted development rights that enable port operations to react to the needs of the market in an efficient and timely way. The Ports are, therefore, dynamic – and often fast changing – land uses.

The Ports need to be able to react to the needs of the market in this way – and, therefore, rely upon their extensive permitted development rights - because of the nature of the industry within which they operate. This is best explained by having regard to the Government’s policy for ports, which is contained in the National Policy Statement for Ports (DfT, 2012) (NPSfP) (a national policy document to which the Local Plan should have regard).

Amongst other things, the NPSfP makes it clear that it is Government policy to “allow judgements about when and where new developments might be proposed to be made on the basis of commercial factors by the port industry or port developers operating within a free market environment” (paragraph 3.3.1). This position – which is a continuation of the ‘market led’ ports policy position which has been in place for some time – is further emphasised in the context of the policy identifying that an element of overall need for port infrastructure is that capacity is provided in the right place. In respect of this matter the NPSfP highlights that it is not for public bodies such as Government to dictate where port development and capacity should be provided (paragraph 3.4.12).

In terms of the need for capacity and development, the NPSfP makes it clear that this depends not only on demand, but also on the need to retain flexibility that ensure that port capacity is located where it is required, and on the need to ensure effective competition and resilience in port operations.

In addition to the policy context within which the Ports of Lowestoft and Ipswich function, it is also necessary to understand the legislative context. In addition to being a statutory undertaker, ABP is also the statutory harbour authority for the two Ports and has to operate the two ports in accordance with both general and port specific legislation. Of note is that both ports are required to operate in accordance with an aspect of legislation commonly known as the ‘open port duty’.

This duty is founded in section 33 of the Harbours, Docks and Piers Clauses Act of 1847, which states:

“Upon payment of the rates made payable by this and the special Act, and subject to the other provisions thereof, the harbour, dock, and pier shall be open to all persons for the shipping and unshipping of goods, and the embarking and landing of passengers.”

In simple terms, the duty is one that provided that the trade is legal and the necessary rates and dues are paid, the two Ports must be open to all for the shipping and unshipping of goods and the movement of passengers.

Against this – albeit very brief – background summary, it is clear that it is unsound for the Council through the emerging Minerals and Waste plan to seek to safeguard land and facilities within these Ports for a particular minerals or waste related trade or use, whilst those sites form and remain part of a statutory port estate.
Such safeguarding could only be said to be sound in circumstances where the sites in question were to be sold off or somehow made available by ABP for non-port / port related development. ABP has no intentions to take such steps in respect of the sites in question or any other parts of the statutory Lowestoft and Ipswich port estates.

Having said this, however, ABP wishes to make it clear that its concern over the potential safeguarding of sites within its operational port areas does not mean that it is saying the sites in question are necessarily unsuitable for minerals and waste purposes. For example, in respect of Wharf Site W3 within the Inner Harbour area of the Port of Lowestoft, ABP is currently giving active considerations – along with potential customers – to its use for the import of aggregate, a use for which ABP consider there to be a clear demand. However, conversely, there is no prospect – currently or in the foreseeable future - of wharf site W2 within the Port of Lowestoft being used for a minerals or waste purpose as this is in use for an alternative port related purpose.

Having regard to the fact, therefore, that some sites within the two ports may well be used for minerals and waste purposes during the plan period, ABP does welcome and support the aspect of policy MP9 which seeks to ensure that the use of existing or potential sites and facilities – including those existing or potential sites within the two ports - is not adversely impacted upon by other development proposals occurring in proximity to them. ABP further supports the requirement set out in policy MP9 that necessary mitigation - in the form of satisfactory alternative facilities – should be made available by those promoting the development causing the adverse impacts for the handling facility.

However, in respect of existing or potential sites and facilities within the operational ports, the protection / mitigation requirements set out in the policy can clearly only be applied in respect of third party non-port developments outside of the port area – and, for the reasons set out, clearly not other port related developments within the port area - or in circumstances where ABP was to somehow dispose of the site in question or make it available to non-port / port related use.
6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible.

Policy MP9 needs to be amended along the following suggested lines. Additional text is shown in bold italicised text and deleted text is shown crossed through through.

‘Policy MP9: Safeguarding of port and rail facilities, and facilities for the manufacture of concrete, asphalt and recycled materials

When proposals are made which would result in the loss of or might potentially compromise the use of:

a) an existing, planned or potential rail head, wharf or associated storage, handling or processing facilities for the bulk transport by rail or sea of minerals, including recycled, secondary and marine-dredged materials, that is not located on operational port land and/or;

b) an existing, planned or potential site for concrete batching, the manufacture of coated materials, other concrete products or the handling, processing and distribution of substitute, recycled and secondary aggregate material that is not located on operational port land;

applicants will be required to demonstrate to the County Council that those sites no longer meet the needs of the aggregates industry. Where this is not the case, satisfactory alternative handling facilities should be made available by the developer. Development proposals in close proximity to the above minerals related facilities should demonstrate that they would not prejudice or be prejudiced by those facilities.

In respect of facilities or potential facilities located on operational port land, the requirements in the preceding paragraphs will only apply in circumstances where:

(i) an existing or potential facility on operational port land is potentially impacted upon by a third party non-port related development; and / or

(ii) where the statutory port authority sells off the site in question or makes it available for non-port and port related development.

Any mitigation required falls on the development that receives planning permission last.

District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies MP9 before providing a consultation response.’
To assist the reader of the Plan, it is also suggested that a paragraph of explanatory text is added after paragraph 5.44 to explain the position further. Wording along the following lines is suggested:

‘5.44 Some facilities of relevance to policy MP9 are located within the statutory Ports of Ipswich and Lowestoft. Having regard to both the national policy of relevance to ports – currently contained within the National Policy Statement for Ports – and the legislative framework within which these ports have to operate it is not possible to safeguard facilities or sites within the ports for a particular minerals or waste use in the same way as it is on other sites. Policy MP9 makes this distinction in respect of the circumstances in which the policy requirements will be applied.’

Finally, and again to assist the reader of the Plan, it is suggested that the sites located on operational port land are distinguished in the list of safeguarded sites provided at Appendix 3 of the Plan. In this way, the reader of the plan can understand which sites the different provisions of policy MP9 apply. It is also necessary for the relevant insets to the policies map (Maps W1 and I1) to distinguish these sites from the others shown.

However, site W2 should be deleted from plan W1 as this area, within the Port of Lowestoft operational area, is in active use for other port related activities and there is no prospect - currently or in the foreseeable future – of this site being used for a minerals or waste related purpose.

7. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the examination?

[ ] No, I do not wish to participate at the oral examination

[X] Yes, I wish to participate at the oral examination

8. If you wish to participate as the oral part of the examination, please outline why you consider this to be necessary:

This representation relates to matters of importance. It is important that ABP is able to test and explore the unsoundness of the Local Plan in respect of these matters and to discuss the changes sought in more detail with the Council and Inspector.

9. Signature: ___________________________ Date: 23rd July 2018
Part B – Please use a separate sheet for each representation

Name or Organisation: Associated British Ports

3. To which part of the Local Plan does this representation relate?

Paragraph 6.34 Policy WP18 Policies Map Inset I1

4. Do you consider the Local Plan is:

4. (1) Legally Compliant

Yes [ ] No [ ]

4. (2) Sound

Yes [ ] No [x]

4. (3) Complies with Duty to co-operate

Yes [ ] No [ ]

Please tick as appropriate

5. Please give details of why you consider the Local Plan in not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please use this box to set out your comments.

This representation needs to be read alongside the ABP representation submitted in respect of policy MP9. For the reasons explained, in summary, in that representation, it is unsound for the Council through the emerging Minerals and Waste plan to seek to safeguard land and facilities within these Ports for a particular minerals or waste related trade or use, whilst those sites form and remain part of a statutory port estate.

Having said this, however, ABP does welcome and support the aspect of policy WP18 which seeks to ensure that the ongoing use of the facilities listed – including those within the two ports - is not adversely impacted upon by other development proposals occurring in proximity to them. However, as indicated in the representation on policy MP9, such protection can only be applied to sites within an operational port in certain circumstances.
6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised working of any policy or text. Please be as precise as possible.

Policy WP18 needs to be amended along the following suggested lines. Additional text is shown in bold italicised text and deleted text is shown crossed through.

‘Policy WP18: Safeguarding of waste management sites

The County Council will seek to safeguard existing sites and sites proposed for waste management use that are not located on port operational land as shown on the Proposals & Safeguarding Maps and will object to development proposals that would prevent or prejudice the use such sites for those purposes unless suitable alternative provision is made.

Development proposals in close proximity to existing sites that are not located on port operational land, should demonstrate that they would not prejudice or be prejudiced by a waste management facility. The safeguarding policy will also apply to any site where planning permission has already been granted.

In respect of existing or potential waste management sites and facilities located on operational port land, the requirements in the preceding paragraph will only apply in circumstances where:

(iii) an existing or potential site or facility on operational port land is potentially impacted upon by a third party non-port related development; and / or

(iv) where the statutory port authority sells off the site in question or makes it available for non-port and port related development.

Any mitigation required falls on the development that receives planning permission last.

District and Borough Councils should consult the County Council when a potentially conflicting proposal falls within the 250 or 400 metre safeguarding zones as defined in the Appendix 3 Safeguarding Maps. The County Council will then refer to Policies WP18 before providing a consultation response. ‘

It is also suggested that a paragraph of supporting text after paragraph 6.34 is inserted, and the relevant waste management site that is located on port operational land is distinguished in the list of sites provide at Appendix 3 of the Plan and on the policies inset plan Map I1.
7. If your representation is seeking modification, do you consider it necessary to participate at the oral part of the examination?

[ ] No, I do not wish to participate at the oral examination

[ ] Yes, I wish to participate at the oral examination

8. If you wish to participate as the oral part of the examination, please outline why you consider this to be necessary:

This representation relates to matters of importance. It is important that ABP is able to test and explore the unsoundness of the Local Plan in respect of these matters and to discuss the changes sought in more detail with the Council and Inspector.

9. Signature: [Redacted] Date: 23rd July 2018

Please return to: Graham Gunby, Development Manager, Suffolk County Council, 8 Russell Road, Ipswich, Suffolk, IP1 2BX. All correspondence must be received by Monday 23rd July 2018 at 17:00, or the views expressed will not be able to be taken into account.