

Planning Department  
Mid-Suffolk District Council  
Endeavour House  
Ipswich  
IP1 2BX

**Application: DE/17/06293 – Outline Planning Permission for 295 Dwellings on land to the North of Gracechurch Street, Debenham.**

Winston Parish Council would like to make the following representations on this proposed development and to register its objection. As a neighbouring Parish to Debenham, our community relies on vital services such as medical and education provided in Debenham and it will be significantly affected by additional commuting traffic resulting from such a large development. Consequently, we are disconcerted and upset that MSDC Planning Department have deemed it unnecessary to consult directly with any neighbouring Parishes to Debenham on this significant proposal.

1. We are fully in support of the Debenham Draft Local Plan. This provides for small in-fill housing development in keeping with a rural infrastructure and community.
2. Debenham High School is already oversubscribed. It is not acceptable to allow a large housing development within the Debenham Parish boundary thereby potentially excluding pupils from our parish and other neighbouring parishes within the Debenham Schools catchment area. Winston pupils would have to travel a far greater distance for their education if schools in Debenham were not available to them.
3. The Surgery in Debenham for all local medical needs is already at full stretch. Permitting such a large development without previously and significantly increasing the facilities and staff at the Debenham surgery would unacceptably lengthen waiting times for appointments and medical attention. There are no alternative surgeries that do not entail a lengthy car journey and neither is there any public transport to these alternatives.
4. The only nearby shops, recreational and social facilities available to Winston residents are in Debenham. Public transport to Debenham from Winston Parish is virtually non-existent. Since the two roads to Debenham from Winston Parish are very busy with speeding cars and trucks, blind bends and without pavements or street lighting, the only safe way to visit these facilities is to travel by car. Parking anywhere in Debenham is already difficult. Travel through the High Street and Gracechurch Street in Debenham, with vehicles parked on one side and insufficient passing space on the other, is hazardous and frustrating. Adding further traffic from the proposed housing development would substantially exacerbate these parking and congestion problems.

5. There are very few available jobs in Debenham itself. There are no educational facilities in Debenham beyond High School level. Bus services are very infrequent and go only to Ipswich. Therefore, occupants of these proposed 295 dwellings will almost inevitably increase the volume of road traffic. This is confirmed by the Transport Assessment provided by the consultants for this Application. We would suggest that most people would be travelling to the Ipswich, Stowmarket and Woodbridge areas for work and education, thereby taking them along one of the two roads through Winston Parish.
6. Adding 295 dwellings in Debenham will also inevitably add further traffic passing through Winston Parish to service this additional community. Visitors cars, delivery vans, service trucks; all will add to our road traffic problem of over 3500 vehicle movements a day, along rural roads that were never meant to take this volume nor type of vehicle.
7. Winston Parish Council has over many years and intensively in the past 5 years, worked with MSDC, Suffolk County Council and Suffolk Constabulary to try to make the B1077 and C477 roads in Winston Parish less dangerous. Due to the road topography, housing on both sides of the road, no pavements, no street lighting, rejection of appeal for a 30mph speed limit instead of 40mph, no police speed enforcement, etc. little or no progress has been made on this issue. Adding yet more commuting traffic from this significant housing development will just increase the risk of accidents along these rural roads.
8. Suffolk County Council are already making efforts to improve flood protection in Debenham. Some properties in Winston Parish are downstream and close to the River Deben and therefore impacted by flooding. Adding a further 295 dwellings with all of the hard-standing surfaces which this development entails will only increase the pressure on potential flooding into Derry Brook which has been evident in Debenham since 1816.
9. We note that there is no further sewerage capacity available for Debenham residencies. The sewerage treatment plant is very close to some Winston Parish properties and already foul smells are frequent and obvious in our community. Permitting further housing development in Debenham **before** increasing the sewerage capacity would be inappropriate and irresponsible.

For the above reasons, all of which will adversely affect the general well-being, access to essential services and safety of Winston residents, the Parish Council urge you to reject this Application.

# PETTAUGH PARISH COUNCIL

5 Mill Field  
Pettaugh  
IP14 6JB

Planning Department  
Mid Suffolk District Council  
Endeavour House  
Ipswich IP1 2BX

30<sup>th</sup> January 2018

## **Planning Application: DE/17/06293 - outline planning permission for the erection of up to 295 dwellings on land to the north of Gracechurch Street, Debenham**

Pettaugh Parish Council would like to make the following representations on the proposed development of land to the north of Gracechurch Street, Debenham.

- The development will have a significant negative effect on the well-being of the residents of Pettaugh by exacerbating the traffic problems the village. These include danger to pedestrians due to few pavements and risk of collisions caused by congestion on an inadequate road system designed for horse-drawn carts. The increased traffic will generate increased pollution and increased noise.
- The traffic flows on the C477 road from Debenham and C446 road towards Crowfield have increased significantly over the past five years with the development that has already taken place in Debenham. There is a major problem with speeding through Pettaugh village where there are few pathways.
- The ever-increasing traffic flow on the A1120 as well as its dangerous junction with the C477 and C446 has been the site of collisions.
- A large proportion of the working population of Debenham already commute daily to areas such as Ipswich and Stowmarket. This number can only increase with the proposed new development which will lead to increased car journeys through Pettaugh.
- Pettaugh has young people who attend school in Debenham. The High School is already oversubscribed with applications from pupils who live 'in catchment'. The addition of 295 extra dwellings will only increase the problem. Unless there is a major development in Debenham schools, Pettaugh pupils will need to travel some distance for their education.
- The proposed development will cause further pressure on the Debenham surgery and medical practitioners who support the residents of Pettaugh.
- With no local shop, many residents of Pettaugh rely on shops in Debenham for their daily needs. The parking in Debenham is already a very serious problem for people who need the shops. The problems can only increase if the proposed development is approved.
- The outline plan addresses none of the above points.

The Parish Council is disconcerted and dissatisfied that MSDC failed to notify it of this development which will have an adverse effect on people living in Pettaugh.

Your faithfully

Mrs M S Marlow. Acting Clerk

Copies to Debenham PC, Councillor Matthew Hicks, Dr Dan Poulter

**Subject:**FW: Emailing: Works to highway DebenhamDC/17/06293

-----Original Message-----

From: Paul Harrison

Sent: 01 May 2018 14:35

To: John Pateman-Gee <John.pateman-Gee@babberghmidsuffolk.gov.uk>

Cc: Philip Isbell <Philip.Isbell@babberghmidsuffolk.gov.uk>

Subject: RE: Emailing: Works to highway Debenham

Thanks John

Thanks for raising with us the proposed highway works which we presume would be required in the event of approval.

Our understanding is that SCC Highways have access to their own heritage advice internally, and follow the relevant SCC Design Guide.

In any event, while there would be a certain degree of visual intrusion in the streetscape, we think in the context that this would amount to very little harm, which would be offset by positive factors such as restricting parking in sensitive areas, and encouraging pedestrian access in the town's historic core. In summary, we do not consider any of the proposed works would be unduly harmful to nearby heritage assets.

Paul

Paul Harrison

Heritage and Design Officer

T 01449 724677 | 07798 781360

E paul.harrison@babberghmidsuffolk.gov.uk

E heritage@babberghmidsuffolk.gov.uk

W [www.babergh.gov.uk](http://www.babergh.gov.uk) | [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

-----Original Message-----

From: John Pateman-Gee

Sent: 01 May 2018 12:28

To: Paul Harrison <Paul.Harrison@babberghmidsuffolk.gov.uk>

Cc: Philip Isbell <Philip.Isbell@babberghmidsuffolk.gov.uk>

Subject: Emailing: Works to highway Debenham

Hi Paul,

Heritage response to application for almost 300 dwellings is not wanting to comment. Could I ask for specific comment on the proposed highway improvements that will be required as a result of this application. Plan is attached. These works to the highway, while mostly yellow lines will include a raised table adjacent a number of Listed Buildings. I need a urgent comment or comment to say no comment on these works.

Would very much appreciate the help.

Regards,

John Pateman-Gee  
Area Planning Manager  
Development Management Services - Economy  
Tel: 07860 827036 Direct Mob  
Tel: 0300 1234000 For all Council services  
Email: [John.Pateman-Gee@BaberghMidSuffolk.gov.uk](mailto:John.Pateman-Gee@BaberghMidSuffolk.gov.uk)  
Web: [www.babergh.gov.uk](http://www.babergh.gov.uk) or [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Based at Endeavour House, 8 Russell Road, Ipswich IP1 2BX. We have two new customer access points:

- Stowmarket (54 Ipswich Street, IP14 1AD) Monday - Thursday, from 9.00am - 5.00pm, or Friday, from 9.00am - 4.30pm
- Sudbury (Town Hall, Old Market Place, CO10 1TL) Monday - Thursday, from 9.00am - 12.30pm and from 1.30pm - 5.00pm, or Friday, from 9.00am - 12.30pm and from 1.30pm - 4.30pm.

Please be advised that any comments expressed in this email are offered as a informal professional opinion unless otherwise stated and are given without prejudice to any decision or action the Council may take in the future. Please check with the email's author if you are in any doubt about the status of the content of this email. Any personal information contained in correspondence shall be dealt with in accordance with Mid Suffolk and Babergh District Council's Data Protection policy and the provisions of the Data Protection Act that can be found on the Council's website.



## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/17/06293 Gracechurch Street, Debenham	
<b>2</b>	<b>Date of Response</b>	29.1.18	
<b>3</b>	<b>Responding Officer</b>	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
<b>4</b>	<b>Summary and Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	1. The Heritage Team does not wish to offer comments on this proposal.	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	The Heritage team considers that the proposed development would have no material impact on the setting of listed buildings or on the setting, character or appearance of the Debenham Conservation Area.	
<b>6</b>	<b>Amendments, Clarification or Additional Information Required</b> (if holding objection)  If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		
<b>7</b>	<b>Recommended conditions</b>		

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.



Planning Services  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2B

20/04//2018

For the attention of: John Pateman-Gee

**Ref: DC/17/06293; Land to the North of Gracechurch Street, Debenham, Suffolk**

Thank you for consulting us on the outline planning permission (all matters reserved) except for access immediately from the public highway, for the erection of up to 295 dwellings, 2ha for potential primary school site or community/care use, and two new vehicular accesses from Gracechurch Street.

This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

### **Recommendations**

The proposed development will inevitably have an impact on the existing rural edge of Debenham village and on setting of Conservation Area and Listed Buildings. With careful design and appropriate mitigation the negative impact of this development can be managed and reduced including appropriate landscape mitigation, architecture and design layout, and appropriate choice of materials. The site itself has been identified through the SHELAA process as a site with development potential on Babergh and Mid Suffolk Consultation Joint Local Plan, 2017 (Draft).

The following points highlight our key recommendations for the submitted proposal:

- 1) Due to the scale of the development and the sensitivity of the site, a landscape strategy should be produced to accompany the application and inform the mitigation strategy before the application is determined. The strategy should be submitted as a standalone document which demonstrates how the proposal will enhance the landscape setting and the public realm, ensure landscape character is not adversely affected, and how the site incorporates itself into the existing movement network. The landscape strategy should include the following sections:
  - a. Context and character
  - b. Landscape design strategy
  - c. Landscape masterplan
  - d. Public open space
  - e. Site movement
  - f. Boundary treatments (inc. sections, height, materials)
  - g. Hard landscaping specification
  - h. SuDS
  - i. Soft landscaping strategy
- 2) The landscape and built local character along Gracechurch Street has a staggered built frontage with long front gardens and access to parking. The proposed residential layout arrangement along Gracechurch

Street should seek to reflect this context and deliver a more interconnected green infrastructure within the layout. As the proposals develop further the design proposal in terms of materials, landscaping and layout along Gracechurch Street should be reviewed.

- 3) It is important that small open green spaces are included within the residential layout. The latest illustrative masterplan does not show these spaces defined and integrated well enough into the development.
- 4) The submitted landscaping scheme needs to illustrate the SuDS features and how they will be planted. The proposed green corridor running north-south axis of the site provides opportunities to incorporate additional SuDS features connecting to the attenuation basin area 5 (as marked on the Illustrative Masterplan CSA/3219/119). There is an opportunity to include additional green infrastructure by linking this green corridor with the proposed landscape area to the west of the site and this should be reviewed.
- 5) The existing vegetation/hedgerow planting dividing the site is of great value, providing both visual maturity and supporting habitats. If the school development or other is to be implemented on both east and west areas these proposals will be required to protect and enhance the existing feature to continue providing the same benefits as it currently does. They should be designed around the conservation of existing vegetation.
- 6) If approved, a detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted. The proposed woodland planting should be specified appropriately. We recommend a landscape maintenance plan for the minimum of 5 years, to support plant establishment. SuDS features such as detention basin and others with landscaping elements are also to be included on the landscape management plan and insurance that adoption is in place prior construction should be detailed. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics. The existing planting should also be included into the landscape maintenance plan.

### **The proposal**

The application documents set out the outline planning permission (all matters reserved) except for access immediately from the public highway, for the erection of up to 295 dwellings, 2ha for potential primary school site or community/care use, and two new vehicular accesses from Gracechurch Street, together with associated developments including flood alleviation and attenuation features; associated public open space and landscaping; and other infrastructure and utilities.

The site lies on the north western side of Debenham, extending north from Gracechurch Street, with part of the north eastern edge fronting onto The Butts. The Site consists of part of a large arable field and an adjacent smaller arable field on the east.

The proposal consists of a residential development, green open spaces supporting new woodland parcels and street tree planting, new boundary hedgerows and trees, as well as areas for water attenuation and a potential new school development being drafted in. Pedestrian links to existing footpath networks have also been included as part of the proposal.

### **Review on the submitted information**

Relevant to this landscape review, the submitted outline application includes a Landscape and Visual Impact Assessment (LVIA), Design and Access Statement and Illustrative Masterplan.

The LVIA has been produced according the guidelines set out in the GLVIA3, Guidelines for Landscape and Visual Impact Assessment, third edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment, in 2013. The report includes recommendations to mitigate and reduce the negative effects the proposal may have. The recommendations deliver a relatively good mitigation strategy. However, Viewpoint 09 along Gracechurch Street proposes hedgerow and tree planting to soften views of the development and the proposed landscaping has delivered a very rigid tree planting arrangement

making it more noticeable and out of context with the rest of the local character. This boundary treatment should be reviewed.

The drawing CSA/3219/119 Illustrative Masterplan shows the areas proposed for residential development, community orchard and green open spaces including attenuation ponds as part of a SuDS strategy. An area for play has also been proposed, contributing towards the provision of Locally Equipped Areas of Play (LEAP) or Local Areas of Play (LAP). The development framework plan produced as part of the Design and Access Statement shows small areas of green open space or pocket parks within the residential development. This has been identified as a local feature that occurs in the village of Debenham. The latest illustrative masterplan doesn't reflect these features clearly enough in terms of its design and size. As the proposal develops further, amendments will be needed to provide better green infrastructure and integration within the residential layout.

The proposed residential layout arrangement along Gracechurch Street does not reflect the existing local built and landscape character along this road towards the High Street. As the proposal develops further, materials, landscaping and building layout along Gracechurch Street should be reviewed to ensure the existing village character and layout arrangement is apparent.

#### **Likely impact on the surrounding landscape and mitigation proposals**

The Suffolk Landscape Character Assessment and the Mid Suffolk Section of the Joint Babergh and Mid Suffolk District Council Landscape Guidance identified the majority of the site as falling within the Rolling Valley Claylands Landscape Character Area (LCA), with the western part of the site located within the Plateau Claylands LCA. The proposal has responded well to the management guidelines set out on the Suffolk Landscape Character Assessment for each of the relevant character areas. This includes:

- Increasing the stock of hedgerows and hedgerow trees.
- Increasing the stock of woodland cover - the proposals include a new area of woodland to complement the woodland to the northwest of the Site.

Other objectives that have been reflected in the development proposals include:

- Maintaining and enhancing the landscape and the settlement pattern, by ensuring a sense of separation between settlements;
- Retain existing field boundaries and reinforcing locally native species hedgerows;
- Safeguarding the meadow, parkland and village green.

To mitigate the visual impact of the development a landscape proposals has been produced consisting on new woodland areas, new hedgerow and hedgerow trees and tree planting within the residential development as well as reinforcing the existing vegetation in and around the site boundaries. Settlement pattern is also an important aspect to consider for this site and should be designed carefully in order to mitigate visual impact along Gracechurch Street and contribute to enhance and work with the Conservation Area and Listed Buildings providing a smooth transition between new and existing built character.

As part of a desktop study and the review of the submitted documents the proposals are not considered to have a significant adverse landscape/townscape or visual effect if the above recommendations are implemented appropriately.

Yours sincerely,

Almudena Quiralte, BA (Hons), Dip LA, ALI  
Landscape Consultant  
Telephone: 033301 36858  
Email: almudena.quiralte@essex.gov.uk

**Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils.** Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



28 March 2018

John Pateman-Gee  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich IP1 2BX

By email only

Dear John,

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*Thank you for requesting advice on this application from Place Services's ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application: DC/17/06293**

**Location: Land To The North Of Gracechurch Street Debenham Suffolk**

**Proposal: Outline Planning permission (all matters reserved) except for access immediately from the public highway, for the erection of up to 295 dwellings, 2ha for potential primary school site or community/care use, and two new vehicular accesses from Gracechurch Street, together with associated developments including flood alleviation and attenuation features; associated public open space and landscaping; and other infrastructure and utilities.**

Thank you for consulting Place Services on the above application.

**No objection subject to conditions to secure:**

- a) **ecological mitigation and enhancements measures.**
- b) **a HRA to determine potential impacts on Deben Estuary SPA/Ramsar**

I have reviewed the ecological assessments which have been provided by the applicant, which have been produced by James Blake Associates, relating to the likely impacts of the development on Protected & Priority habitats and species. This includes a Phase 1 survey and Phase 1 addendum (December 2017), Breeding bird Survey (December 2017), Otter and Water Vole Survey (October 2017), Great Crested Newt Survey (July 2017) and Reptile Survey (June 2017).

**Recommendations:**

The mitigation and enhancement measures identified in the Phase 1 survey, Phase 1 addendum (James Blake Associates, December 2017), Breeding bird Survey (December 2017), Otter and Water Vole Survey (October 2017), Great Crested Newt Survey (July 2017) and Reptile Survey (June 2017) - should be secured and implemented in full. This is necessary to conserve and enhance protected and priority species. In summary, the following actions should be undertaken for the proposed development:



1. A copy of a European Protected Species Mitigation Licence should be submitted for great crested newts from Natural England.
2. A Construction Environmental Management Plan – (CEMP: Biodiversity) is recommended for mitigating impacts on protected and priority species during the construction phase. This should include mitigation measures during the construction phase identified within the Phase 1 Survey (December 2017), the Breeding bird Survey (December 2017), Great Crested Newt Survey (July 2017) and Reptile Survey (June 2017).
3. A farmland bird mitigation strategy should be implemented to provide compensatory habitat, which can be secured outside of the proposed development.
4. Immediately before construction occurs, a further badger survey should also be undertaken to see whether any badger activity has changed. This survey should act as confirmation that works can proceed without potential impacts to badgers. If it is identified that badger activity has changed, then amendments to the CEMP should be made where applicable, prior to construction.
5. Precautionary mitigation measures for bats should be undertaken to mitigate the possible impacts of lighting during construction and prior to occupations.
6. A Landscape and Ecological Management Plan should be provided to determine the management and locations of ecological landscape features and proposed enhancements.
7. A reptile mitigation strategy may be required if the site margins highlighted within the Reptile Survey (June 2017) cannot be maintained.

In addition, there is an impact pathway for changes in water quality in the Derry Brook, a tributary of the River Deben as a result of development. This could result in a Likely Significant Effect on the Deben Estuary SPA and Ramsar site. The LPA is therefore currently undertaking a HRA screening for this development based on information supplied by the applicant. The HRA Screening for this development will be informed by the SEA / HRA Screening Report for the Debenham Neighbourhood Plan 2016 -2036.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013. In terms of biodiversity net gain, the enhancements contribute to this aim.

Submission for approval and implementation of the details below should be a condition of any planning consent.

#### **Recommended Conditions:**

##### **I. CONCURRENT WITH RESERVED MATTERS: SUBMISSION OF A COPY OF THE EPS LICENCE FOR GREAT CRESTED NEWTS**

*“Any works to the terrestrial habitat identified within the Great Crested Newt Survey (James Blake Associates, July 2017), shall not in any circumstances commence unless the local planning authority has been provided with either:*

- a) a licence issued by Natural England pursuant to Regulation 55 of The Conservation of Habitats and Species Regulations 2017 authorizing the specified activity/development to go ahead; or*
- b) a statement in writing from the relevant licensing body to the effect that it does not consider that the specified activity/development will require a licence.”*



**Reason:** To conserve and enhance Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species) and s17 Crime & Disorder Act 1998.

## **II. CONCURRENT WITH RESERVED MATTERS: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

*“A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority.*

*The CEMP (Biodiversity) shall include the following.*

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

*The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority”*

**Reason:** To allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

## **III. CONCURRENT WITH RESERVED MATTERS: COMPLIANCE WITH RECOMMENDATIONS OF THE ECOLOGICAL REPORT**

*“All ecological mitigation and enhancement measures and/or works, shall be carried out in accordance with the details contained in the Phase 1 survey, Phase 1 addendum (James Blake Associates, December 2017), Breeding bird Survey (December 2017), Otter and Water Vole Survey (October 2017), Great Crested Newt Survey (July 2017) and Reptile Survey (June 2017) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.”*

**Reason:** To allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

## **IV. CONCURRENT WITH RESERVED MATTERS: FARMLAND BIRD MITIGATION STRATEGY**

*“A Farmland Bird Mitigation Strategy shall be submitted for approval and implemented in full to mitigate the loss of any nesting habitat.”*



**Reason:** To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

**V. CONCURRENT WITH RESERVED MATTERS: BADGER SURVEY**

*“A further badger survey shall take place immediately prior to commencement of works to assess the possible changes of badger activity which may affect the proposed development”*

**Reason:** To conserve and enhance Protected species and allow the LPA to discharge its duties under the Badgers Act 1992 as amended and s17 Crime & Disorder Act 1998.

**VI. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME**

*“A lighting design scheme for biodiversity shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.*

*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.”*

**Reason:** To allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

**VII. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN (LEMP)**

*“A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior occupation of the development.*

*The content of the LEMP shall include the following.*

- a) Description and evaluation of features to be managed.*
- b) Ecological trends and constraints on site that might influence management.*
- c) Aims and objectives of management.*
- d) Appropriate management options for achieving aims and objectives.*
- e) Prescriptions for management actions.*
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- g) Details of the body or organization responsible for implementation of the plan.*
- h) Ongoing monitoring and remedial measures.*

*The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the*



*development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."*

**Reason:** To allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact me with any queries.

Regards,

**Hamish Jackson GradCIEEM BSc (Hons)**

Junior Ecological Consultant

Place Services at Essex County Council

[Hamish.Jackson@essex.gov.uk](mailto:Hamish.Jackson@essex.gov.uk)

**Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

**From:** David Pizzey  
**Sent:** 17 January 2018 11:46  
**To:** John Pateman-Gee  
**Cc:** BMSDC Planning Area Team Blue  
**Subject:** DC/17/06293 Land To The North Of, Gracechurch Street, Debenham

John

Due to the existing agricultural land use there are unlikely to be any significant arboricultural issues relating to this proposal. The majority of trees are located along the boundary of the site and if provided with sufficient space in the layout design should remain unaffected. I therefore have no objection to the application at this stage subject to it being undertaken in accordance appropriate protection measures that will need to be agreed as part of reserved matters or at full application.

Please let me know when/if you require any further input.

Regards

**David Pizzey** FArborA  
Arboricultural Officer  
Tel: 01449 724555  
[david.pizzey@baberghmidsuffolk.gov.uk](mailto:david.pizzey@baberghmidsuffolk.gov.uk)  
[www.babergh.gov.uk](http://www.babergh.gov.uk) and [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)  
Babergh and Mid Suffolk District Councils – Working Together



## Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference:	00025926
Local Planning Authority:	Mid Suffolk District
Site:	Land To The North Of Gracechurch Street, Debenham
Proposal:	Outline Planning permission (all matters reserved) except for access immediately from the public highway, for: the erection of up to 295 dwellings, 2ha for potential primary school site or community/care use, and two new vehicular accesses from Gracechurch Street, together with associated developments including flood alleviation and attenuation features; associated public open space and landscaping; and other infrastructure and utilities.
Planning Application:	DC/17/06293

**Prepared by:** Pre-Development Team

**Date:** 08 February 2018

If you would like to discuss any of the points in this document please contact me on 0345 606 6087 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)

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## **ASSETS**

### **Section 1 – Assets Affected**

- 1.1 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

## **WASTEWATER SERVICES**

### **Section 2 – Wastewater Treatment**

- 2.1 The foul drainage from this development is in the catchment of Debenham Water Recycling Centre which currently does not have capacity to treat the flows from the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.

### **Section 3 – Foul Sewerage Network**

- 3.1 Development will lead to an unacceptable risk of flooding downstream. A drainage strategy will need to be prepared in consultation with Anglian Water to determine mitigation measures.

We request a condition requiring the drainage strategy covering the issue(s) to be agreed.

### **Section 4 – Surface Water Disposal**

- 4.1 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

### **Section 5 – Trade Effluent**

- 5.1 The planning application includes employment/commercial use. To discharge trade effluent from trade premises to a public sewer vested in Anglian Water requires our consent. It is an offence under section 118 of the Water Industry Act 1991 to discharge trade effluent to sewer without consent. Anglian Water would ask that the following text be included within your Notice should permission be granted.
-

*"An application to discharge trade effluent must be made to Anglian Water and must have been obtained before any discharge of trade effluent can be made to the public sewer.*

*Anglian Water recommends that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of such facilities could result in pollution of the local watercourse and may constitute an offence.*

*Anglian Water also recommends the installation of a properly maintained fat traps on all catering establishments. Failure to do so may result in this and other properties suffering blocked drains, sewage flooding and consequential environmental and amenity impact and may also constitute an offence under section 111 of the Water Industry Act 1991."*

## **Section 6 – Suggested Planning Conditions**

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

### **Foul Sewerage Network (Section 3)**

#### **CONDITION**

*No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.*

#### **REASON**

*To prevent environmental and amenity problems arising from flooding.*

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## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/17/06293	
<b>2</b>	<b>Date of Response</b>	31/01/18	
<b>3</b>	<b>Responding Officer</b>	Name:	Hannah Bridges
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
<b>4</b>	<b>Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection subject to condition	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	Ensure that the roads and lanes are all suitable for a 32 tonne refuse collection vehicle (RCV) to manoeuvre around the development. Scaled development maps are required to check the suitability as the lanes off the main road may not be large enough for the RCV to easily manoeuvre due to the angles of the lanes. The main service road specifications have not been issued so this cannot be checked for suitability. The RCV specification has been included for reference.   OLYMPUS - 8x4MS Wide - Euro 6 - Smo  No individual wheeled bin presentation points/ bin stores have been marked on the maps, these need to be included to ensure that they are at the best possible locations.	
<b>6</b>	<b>Amendments, Clarification or Additional Information Required</b> (if holding objection)  If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		
<b>7</b>	<b>Recommended conditions</b>	Please met all the points in the discussion.	

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

Resource Management  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk  
IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Ipswich IP6 8DL

Enquiries to: Rachael Abraham  
Direct Line: 01284 741232  
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Web: <http://www.suffolk.gov.uk>

Our Ref: 2017\_06293  
Date: 19<sup>th</sup> January 2017

For the Attention of John Pateman-Gee

Dear Mr Isbell

**Planning Application DC/17/06293 – Land to the north of Gracechurch Street, Debenham: Archaeology**

This site is an area of high archaeological potential given its topographic location sloping down to the River Deben on the north and based upon information recorded within the County Historic Environment Record. The cropmark of a ring ditch/circular feature is recorded within the site (DBN 029), at the eastern end. This may represent the remains of a prehistoric burial mound and therefore has the potential to be associated with human burials, however, the field within which this feature is located is called 'The Butts' and so this may be a feature of medieval date associated with an archery practice site. A large scatter of medieval/late Saxon and Roman pottery is recorded from within the site, potentially indicating occupation, and metal finds from medieval and later periods are also recorded (DBN 096). Further scatters of prehistoric, Roman, Anglo Saxon, medieval and post medieval finds are also recorded from fields surrounding the proposed development area (DBN 002, 003, 067, 068, 091, 092, 093, 112, 126). A geophysical survey undertaken at the site has identified several anomalies of potential archaeological origin. However, this proposed development area has not been ground-truthed through systematic trial trenched evaluation and as a result there is high potential for additional previously unrecorded heritage assets to survive. The proposed development would have a direct impact upon heritage assets as the planned works will damage or destroy any surviving remains which do exist within the site.

Given the high potential, lack of previous investigation and large size of the proposed development area, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site prior to the determination of any planning application submitted for this site, to allow for preservation *in situ* of any sites of national importance that might be defined (and which are still currently unknown). This large area cannot be assessed or approved in our view until a full archaeological evaluation has

been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 128 and 129 of the National Planning Policy Framework and is consistent with the advice provided to the developer during pre-application discussions.

Decisions on the suitability of the site, and also the need for, and scope of, any further work should below-ground heritage assets of significance be identified, will be based upon the results of the evaluation.

In order to establish the archaeological potential of the proposed development area, we would advise that a systematic trial trenched evaluation should be required for this site. The results of the evaluation should be presented as part of this planning application, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important heritage assets within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation.

Further details on our advisory services and charges can be found on our website:

<http://www.suffolk.gov.uk/archaeology/>

Do let us know if you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer  
Conservation Team

**From:**RM PROW Planning  
**Sent:**18 Apr 2018 09:53:34 +0100  
**To:**BMSDC Planning Area Team Blue  
**Subject:**RE: MSDC Planning Consultation Request - DC/17/06293

**For The Attention of: John Pateman-Gee**

## **Public Rights of Way Response**

Thank you for your consultation concerning the above application.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Public Footpath 46 is recorded through the proposed development area.

Whilst we do not have **any objections** to this proposal, the following informative notes apply.

## **Informative Notes**

The granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

**To apply to carry out work on the Public Right of Way or seek a temporary closure**, visit <http://www.suffolkpublicrightsofway.org.uk/home/temporary-closure-of-a-public-right-of-way/> or telephone 0345 606 6071.

**To apply for structures, such as gates, on a Public Rights of Way**, visit

<http://www.suffolkpublicrightsofway.org.uk/home/land-manager-information/> or telephone 0345 606 6071.

1. Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. If you wish to build upon, block, divert or extinguish a public right of way within the red lined area marked in the application, an order must be made, confirmed, and brought into effect by the local planning authority, using powers under s257 of the Town and Country Planning Act 1990. In order to avoid delays with the application this should be considered at an early opportunity.
2. The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team; any damage resulting from these works must be made good by the applicant.
3. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of the Public Right of Way with a retained height in excess of 1.37 metres must not be constructed without the prior approval of drawings & specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Applicants are strongly encouraged to discuss preliminary proposals at an early stage, such that the likely acceptability of any proposals can be determined, and the process to be followed can be clarified.

Construction of any retaining wall or structure that supports the Public Right of Way or is likely to affect the stability of the right of way may also need prior approval at the discretion of Suffolk County Council.

4. If the Public Right of Way is temporarily affected by works which will require it to be closed, a Traffic Regulation Order will need to be sought from Suffolk County Council.

5. The applicant must have private rights to take motorised vehicles over the Public Right of Way. Without lawful authority it is an offence under the Road Traffic Act 1988 to take a motorised vehicle over a Public Right of Way other than a byway. We do not keep records of private rights and suggest a solicitor is contacted.
  - **Public footpath** – only to be used by people **on foot**, or using a mobility vehicle.
  - **Public bridleway** – in addition to people on foot, bridleways may also be used by someone on a **horse** or someone riding a **bicycle**.
  - **Restricted byway** – has similar status to a bridleway, but can also be used by a ‘non-motorised vehicle’, for example a **horse and carriage**.
  - **Byway open to all traffic (BOAT)** – can be used by **all vehicles**, including motorised vehicles as well as people on foot, on horse or on a bicycle. In some cases, there may be a Traffic Regulation Order prohibiting forms of use.
6. Public Rights of Way & Access is not responsible for maintenance and repair of the route beyond the wear and tear of normal use for its status and it will seek to recover the costs of any such damage it is required to remedy.
7. There may be other public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

More information about Public Rights of Way can be found at  
[www.suffolkpublicrightsofway.org.uk](http://www.suffolkpublicrightsofway.org.uk)

John Pateman-Gee  
Mid Suffolk District Council  
Planning Department  
131, Council Offices High Street  
Needham Market  
Ipswich  
IP6 8DL

**Our ref:** AE/2018/122695/01-L01  
**Your ref:** DC/17/06293  
**Date:** 12 April 2018

Dear Mr Pateman-Gee

**OUTLINE PLANNING PERMISSION (ALL MATTERS RESERVED) EXCEPT FOR ACCESS IMMEDIATELY FROM THE PUBLIC HIGHWAY, FOR: THE ERECTION OF UP TO 295 DWELLINGS, 2HA FOR POTENTIAL PRIMARY SCHOOL SITE OR COMMUNITY/CARE USE, AND TWO NEW VEHICULAR ACCESSSES FROM GRACECHURCH STREET, TOGETHER WITH ASSOCIATED DEVELOPMENTS INCLUDING FLOOD ALLEVIATION AND ATTENUATION FEATURES FOR WIDER MITIGATION AND SEPERATE SUDS FOR SITE; ASSOCIATED PUBLIC OPEN SPACE AND LANDSCAPING; AND OTHER INFRASTRUCTURE AND UTILITIES.**

**LAND TO THE NORTH OF GRACECHURCH STREET DEBENHAM SUFFOLK**

Thank you for your consultation dated 28 March 2018. We have inspected the application, as submitted, and have no objections, providing that you are satisfied that the development would be safe for its lifetime and you assess the acceptability of the issues within your remit.

**Flood Risk**

The applicant has sequentially sited all proposed development within Flood Zone 1. Our maps show the site boundary lies within fluvial Flood Zone 3 defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as having a high probability of flooding. The proposal is for the erection of up to 295 dwellings, 2ha for a potential primary school site or community/care use, and two new vehicular accesses from Gracechurch Street, together with associated developments including flood alleviation and attenuation features for wider mitigation and separate SuDs for

site; associated public open space and landscaping; and other infrastructure and utilities which is classified as a 'more vulnerable' development, as defined in [Table 2: Flood Risk Vulnerability Classification](#) of the Planning Practice Guidance. We are satisfied that the flood risk assessment, referenced CCE/U491/FRA-01 and dated December 2017, provides you with the information necessary to make an informed decision.

In particular:

- Drawing CSA/3219/118 shows all proposed development lies within Flood Zone 1
- The access and egress route travels through Flood Zones 1 and therefore does have a safe route of access.
- Flood Storage Compensation is not required.

### **Incorporating New Climate Change Allowances**

As the applicant has sequentially sited their proposed development to be wholly within Flood Zone 1, we feel it is unnecessary to request the applicant to re-model the River Deben; designated main river in order to incorporate the new climate change allowances. This is because the majority of the new climate change allowances have not exceeded the current extent of the existing flood zone 2.

### **Other Advice**

#### Sequential and Exception Tests

The site is located within Flood Zone 1 with a 'low probability' of flooding, with less than a 1 in 1000 annual probability of river flooding in any year (<0.1%). Therefore, the Sequential and Exception Tests will not need to be undertaken as part of this planning application.

#### Other Sources of Flooding

In addition to the above flood risk, the site may be within an area at risk of flooding from surface water, reservoirs, sewer and/or groundwater. We have not considered these risks in any detail, but you should ensure these risks are all considered fully before determining the application.

### **Environmental Permit for Flood Risk Activities**

The applicant may need an environmental permit for flood risk activities if they want to do work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert. The River Deben, is designated a 'main river'.

Application forms and further information can be found at:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>. Anyone carrying out these activities without a permit where one is required, is breaking the law.

## **Flood Alleviation**

We are pleased that conclusion 4.2 has been incorporated into the FRA, declaring the intention to provide “an opportunity to deliver (either physically or via financial contribution) a NFM scheme in the Derry Brook catchment to contribute to the wider flood management of Debenham village”. This is in keeping with our strategic approach to managing flood risk in Debenham. We have been working in partnership with Suffolk County Council Holistic Water Management Project and The Rivers Trust Essex and Suffolk Catchment Partnership to promote and deliver a range of flood attenuation Natural Flood Management features upstream of the village of Debenham.

In 2015, JBA carried out a ‘High Level Assessment of flood storage options in Debenham: Phase 1- Natural Flood Management’. The original JBA flood model of 2014 (on which the Phase 1 NFM report was based) has now been replaced by the Debenham 2017 flood model. Although the baseline information on which the 2014 report was based is now out of date, the general conclusion still applies: that it demonstrates a clear benefit of flood attenuation storage upstream of Debenham.

Thus, the provision of a flood attenuation feature of approximately 5000m<sup>3</sup> would complement the overall strategic approach, and would potentially contribute to a reduction in flood risk in the village.

We are therefore pleased to note the presence of a Flood Alleviation Feature on the Development Framework Plan drawing CSA/3219/118. Without specific details regarding the contributing catchment and the required storage volumes, it is not possible to provide comment on whether the allocated space is appropriately sized. However, it is encouraging that such a space is being allocated to this cause.

We note that a decision is yet to be made as to whether this would be a separate feature, or would form part of the SuDS network for the site. One of the key advantages of retaining separation between these is that the site SuDS network will discharge at a specified and greatly reduced rate as detailed via the surface water management design process. In keeping the SuDS features and the Flood Alleviation Feature separate, this enables greater control over the management of discharge rates from the site.

The desirable outfall rates will need to be considered in the context of the catchments of tributaries upstream of Debenham. Owing to the geographical proximity, each of the tributaries are highly likely to respond to the same rainfall event, and the impacts of attenuating flows on the hydrographs should be a consideration. For example, attenuation on each tributary may mean that a delayed peak flow on each of the tributaries arrives in the village all at the same time. In this case, coinciding peak flows could actually increase flood risk. Therefore, the discharge rates from the attenuation features should be given adequate considerations in relation to time to peak analysis.

Both the flood attenuation and SuDS attenuation features will need to be kept out of the flood zones.

We trust this information is useful.

Yours sincerely

**Miss Charlie Christensen**  
**Planning Adviser**

Direct dial 02084 745593

Direct e-mail [charlie.christensen@environment-agency.gov.uk](mailto:charlie.christensen@environment-agency.gov.uk)

cc Boyer Planning Ltd

**Subject:**FW: 2018-03-27 JS Reply Land To The North Of, Gracechurch Street, Debenham, Suffolk Ref DC/17/06293

**From:** Jason Skilton

**Sent:** 27 March 2018 10:34

**To:** BMSDC Planning Area Team Blue <[planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk)>

**Cc:** John Pateman-Gee <[John.pateman-Gee@baberghmidsuffolk.gov.uk](mailto:John.pateman-Gee@baberghmidsuffolk.gov.uk)>

**Subject:** 2018-03-27 JS Reply Land To The North Of, Gracechurch Street, Debenham, Suffolk Ref DC/17/06293

Dear John Pateman-Gee,

**Subject: Land To The North Of, Gracechurch Street, Debenham, Suffolk Ref DC/17/06293**

Suffolk County Council, Flood and Water Management have reviewed application ref DC/17/06293

We have reviewed the following submitted documents and we recommend **approval of this application subject to conditions:**

- Flood Risk Assessment & Appendices Ref CCE/U491/FRA-01
- Ground Contamination Report Ref
- Site Location Plan Ref CSA/3219/112 Rev A
- Land Ownership Deeds

We propose the following condition in relation to surface water drainage for this application.

1. Concurrent with the first reserved matters application(s) 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 Qbar less 30% 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. Modelling of the fluvial attenuation storage area to show that the attenuation features will contain the 1 in 100 year rainfall event including climate change

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(s) 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 as per s21 of the Flood and Water Management Act.*

4. No development shall commence until details of a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:
  - a. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
    - i. Temporary drainage systems
    - ii. Measures for managing pollution / water quality and protecting controlled waters and watercourses
    - iii. Measures for managing any on or offsite flood risk associated with construction

Reason: To ensure the development does not cause increased flood risk, or pollution of watercourses in line with the River Basin Management Plan

#### Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment is subject to payment of a surface water developer contribution

Kind Regards

Jason Skilton  
Flood & Water Engineer, Flood & Water Management  
Growth, Highways and Infrastructure  
Suffolk County Council  
Endeavour House, 8 Russell Rd, Ipswich, Suffolk IP1 2BX  
Telephone: 01473 260411  
Email: [jason.skilton@suffolk.gov.uk](mailto:jason.skilton@suffolk.gov.uk)  
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Your ref: 17/06293/OUT  
Our ref: 00049849  
Date: 6 March 2018  
Enquiries to: James Cutting  
Tel: 01473 264803  
Email: [james.cutting@suffolk.gov.uk](mailto:james.cutting@suffolk.gov.uk)



John Pateman-Gee  
Growth and Sustainable Planning  
Endeavour House,  
8 Russell Road,  
Ipswich IP1 2BX

Dear Mt Pateman-Gee,

**APPLICATION FOR OUTLINE PLANNING PERMISSION - DC/17/06293  
Land north of Gracechurch Street, Debenham (Parcel A)**

I refer to your notification letter dated 11 January 2018 and planning application ref: DC/17/06293. Thank you for consulting us on this application.

The Suffolk County Council's infrastructure requirements for education, early years, libraries and waste are set out below. Contributions towards infrastructure would be through a combination of CIL receipts and through a Section 106 agreement. County Council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider. Comments on supported housing and broadband are also provided.

The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

The County and District Councils have a shared approach to calculating infrastructure needs, in the adopted [Section 106 Developers Guide to Infrastructure Contributions in Suffolk](#).

Mid Suffolk District Council adopted its Core Strategy in September 2008 and Focused Review in December 2012. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 6 seeks to ensure provision of adequate infrastructure to support new development. Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk, with FC1.1 specifically encouraging the use of

development briefs and masterplans as relevant to the integration of physical, social and environmental infrastructure.

- Policy CS4 requires all developers to consider infrastructure requirements and that, where adequate capacity does not exist, provision will need to be made within an appropriate timescale, and CS6 expects new development to provide of support the delivery of appropriate and accessible infrastructure.

In addition, the 1998 Local Plan contains the following policies which have been saved:

- T4 – Planning Obligations and Highway Infrastructure, focusing on the need for development to make a contribution to highway improvements and that the local planning authority will not view the offer of infrastructure as a reason to permit development.
- RT12 – Footpaths and bridleways
- SC8 – Siting of new schools

### **Community Infrastructure Levy (CIL)**

Mid Suffolk District Council adopted a CIL Charging Schedule on 21 January 2016 and started charging CIL on planning permissions granted from 11th April 2016. The current Mid Suffolk “123 List”, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Public transport improvements
- Provision of library facilities
- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Strategic flooding
- Provision of waste infrastructure

As of 6 April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy. Apart from the new early years setting, the requirements being sought would be requested through CIL. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

In terms of Transportation, Sam Harvey - Senior Development Management Engineer – responded on 6 February 2018 and set out conditions and obligations relating to public transport and travel planning. Further response regarding impacts on rights of way will be issued shortly.

The details of contribution requirements related to the proposed scheme are set out below:

- 1. Education.** The NPPF (paragraph 72) states: ‘The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take

a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education’.

The NPPF (at paragraph 38) also states: ‘For larger scale residential developments in particular, planning policies should promote a mix of uses to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.’

SCC anticipates the following **minimum** pupil yields from a development of 295 dwellings (which can be reassessed when the precise mix is known), namely:

- a. Primary school age range, 5-11: 73 pupils. Cost per place is £12,181 (2017/18 costs).
- b. Secondary school age range, 11-16: 52 pupils. Cost per place is £18,355 (2017/18 costs).
- c. Sixth-form school age range, 16+: 11 pupils. Costs per place is £19,907 (2017/18 costs).

The local catchment schools are Sir Robert Hitcham CEVAP School, Debenham, Debenham High School (11-16) and Hartismere School (16-18).

The catchment primary is forecast to have approximately six spaces available to accommodate further development in 2021. This is based on 194 pupils attending and a 95% capacity of 200. Therefore, further capacity for the remaining 67 would need to be built.

Debenham High School is forecast to have no capacity available to accommodate further development. Therefore, further capacity for the remaining 52 would need to be built. Equally, there is no available capacity to accommodate the 11 additional sixth form students at Hartismere School.

Mid Suffolk District Council is currently preparing its new local plan. Whilst this site was part of a slightly smaller area, the district council has identified this and two other sites – totalling some 424 homes - as being deliverable for residential development within its Draft Strategic Housing and Economic Land Availability Assessment (SHELAA - August 2017).

In responding to the previous consultation stage, the county council highlighted the lack of primary and secondary places and that Debenham is one location where further discussion will be necessary to understand the level of growth and to explore strategies for additional provision.

The Parish Council is also preparing a Neighbourhood Plan, which allocates three sites, not including this application site, with an estimated yield of between 112 and 262 homes. By way of a guide, this has the potential to generate between 28 and 66 further primary pupils.

*Primary*

The Sir Robert Hitcham CEVAP School is a maintained school and rated by Ofsted as Good. The Debenham Roundabout pre-school is accommodated within the grounds of the Primary School and the school has its own nursery. Co-locating early years settings with primary schools is a priority for Suffolk County Council as this has benefits for pupils, parents and education providers.

The site is bounded by Derry Brook Lane and Aspall Road and, whilst there are parking restrictions along these roads, parking on the yellow lines near the primary school does occur, creating tension with other road users. The development is approximately 800m from the school and additional measures to encourage people to walk would be necessary. Notwithstanding measures to encourage walking and cycling, the additional growth is likely to exacerbate the existing parking problem. Furthermore, the location of the primary school, at the northern end of the village, is not the optimum for promoting people to walk or cycle to and from the school.

In order to accommodate the resultant forecast increase in pupils from this development, the school would need to expand from its current 210 places (which is 200 at 95% capacity) to 315 places. However, if the further growth is anticipated in Debenham the suitability of extending the school in its current site needs to be reviewed. An additional 424 homes (as anticipated by the SHELAA) would potentially result in 106 additional primary school children that, together with the 194 pupils forecast would be at the limit of a 315-place school (300 places at 95% capacity).

No feasibility work or discussion with the school has been undertaken to consider the practicalities involved in the options around expansion. Expanding the school (to 315 places for example) within its current site could remain within government guidance (Building Bulletin 103) on site area. Whilst possible, the impact (e.g. traffic, ecological and landscape) would need to be assessed but there is a fundamental question of whether its current location maximises the potential for use of sustainable transport modes into the future.

The potential offered by the proposal to provide 2ha of land for a new primary school does provide an opportunity to consider the longer-term educational needs of the village, such as the growth proposed by the neighbourhood plan. The location does appear to offer improved proximity to the rest of the village, but the wider catchment also needs to be considered including the need for bus parking and turning. Pending the outcome of local agreement and the local and neighbourhood plans, Suffolk County Council would wish to reserve the area for education use. Relocation of schools is not a straight forward process and the county council is concerned that the overall cost involved would adversely impact on its budget for education.

If the primary school were to remain at its current location, the facilities at the school could also be improved. An all-weather Multi-Use Games Area (MUGA), for example, would help to address comments made by pupils and governors to Ofsted that play space is limited during wet weather. The cost of a MUGA is around £200,000.

Based on the assumption that the existing school would be expanded, the cost multipliers and the requirement for 67 places, the total amount to be sought through CIL receipts would be **£816,127**.

### *Secondary*

There are similar considerations that need to be made to the scale and pattern of development that arises from this development (52 secondary pupils) and potential further growth through local and neighbourhood plans.

The secondary school serves a broad area surrounding Debenham incorporating Bedfield, Creeting St Mary, Earl Soham, Helmingham, Stonham Aspal and Wetheringsett primary schools within its pyramid. The performance of the school has remained high allowing the school to retain Ofsted's "outstanding" assessment.

The high school has no land to develop further and, although the school already makes extensive use of the adjacent leisure centre, the area available to the school site does not include this land. This limits the ability for the school to be enlarged through a conventional extension.

Suffolk County Council are investigating enlargement options with the school and cannot provide further certainty to the likely solution or the cost. Equally, until a review of options proves otherwise, there does not appear to be a specific impediment to granting planning permission. Until further consideration of how the school can be enlarged, the best estimation of a cost assumption is **£954,460** (£18,355 per pupil), which would be required from the district council's CIL receipt.

### *Sixth-form*

The increase in demand from the 11 additional sixth form students would result in the need for enlargement at Hartismere School, the likely cost of which is £218,977 (£19,907 per student).

## **2. Early Years Provision.**

The provision is sufficient places for early years education is an important component of Section 8 "*Promoting healthy communities*" of the NPPF. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds. Furthermore, from September 2017, an additional 15 hours was available to eligible households.

This development falls within the ward of Debenham where there is a current **deficit** of approximately 24 places. The Debenham Roundabout pre-school is accommodated within the grounds of the Primary School and the school has its own nursery. The lack of additional spaces creates a demand for a further 30 places

and a new early years setting will need to be provided on site. The size of the development justifies this approach and an additional setting adds greater diversity and resilience.

The costs of building an early years setting is currently estimated to be £3,055/m<sup>2</sup> and the total floorspace required for the 30 places would be 165m<sup>2</sup>, resulting in an overall build cost of **£504,075** that, as this would be a new setting, would be required through a s.106 agreement. Serviced land (e.g. level and unimpeded) of approximately 0.1ha, would need to be reserved and transferred and be part of the agreement.

- 3. Libraries** – Suffolk County Council would look towards securing **£63,720** to support improved facilities and outreach at Debenham from income arising from CIL receipts.
- 4. Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

*- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.*

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling and this will be secured by way of a planning condition.

The increase in households will increase demand at Stowmarket's Household Waste Recycling Centre (HWRC), which is already at capacity and significantly challenged by restricted space for containers and parking for example.

SCC has a project underway to identify a new HWRC site for the Stowmarket catchment area. The current projected cost of a new HWRC in this area is more than £3m. This is a priority site in the Waste Infrastructure Strategy and budget availability for this purpose is currently being pursued. Contributions of £93 per household from development in this area will be requested from income arising from CIL receipts, the total for this application being **£27,435**.

5. **Supported Housing.** In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic. Following the replacement of the Lifetime Homes standard, designing homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. If the land reserved for the school is not required, housing with care for older people could meet local needs.
  
6. **Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each building within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

7. **Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106 agreement, whether or not the matter proceeds to completion.

The above information is time-limited for 6 months only from the date of this letter and/or will need to be reassessed if a planning application is submitted.

Yours sincerely,

James Cutting

Planning Strategy Manager  
Growth, Highways and Infrastructure

Your Ref: 17/06293/OUT  
Our Ref: 00049849  
Date: 8 November 2018  
Enquiries to: James Cutting  
Tel: 01473 264803  
Email:james.cutting@suffolk.gov.uk



John Pateman-Gee  
Growth and Sustainable Planning  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2BX

Dear Mr Pateman-Gee

### **Application for Outline Planning Permission – DC/17/06293**

I refer to my previous letter dated 6 March 2018. I set out below an updated position on waste and education, following updated education forecasts and further consideration about accommodating growth in Debenham, including that connected with the emerging Neighbourhood Plan.

The contributions and strategy for Libraries, Sixth Form and Early Years, as set out in the March, remain the same. For early years, there remains a local deficit of places, but this has declined from 24 to eight places. Early years build costs have also been updated, which are now lower for a 30-place setting at £435,900.

### **Education**

The pupil yields and standard cost per place estimates remain the same but pupil forecasts have been updated since March. Like most parts of the county, the forecast number of pupils has declined. Suffolk County Council has also engaged with the schools further and investigated the potential for enlarging the primary and secondary school.

### **Sir Robert Hitcham CEVAP School**

Capacity	95%	Actual (2018-19)/Forecast Pupil Numbers				
		2018-19	2019-20	2020-21	2021-22	2022-23
210	200	181	176	170	158	148

The number of surplus places available at the school has increased based on most recent forecasts. Previously, it was estimated that six spaces would be available at the end of the forecast period (2021), whereas more recent data is showing this to increase to 52 at the end of the new period (2022). The development at Gracechurch Street would still require additional capacity but for an additional 21 pupils instead of 67, with changes the assumed

level of contribution from the Community Infrastructure Levy (CIL) from this proposal to **£255,801**.

### *Impact alongside Neighbourhood Plan*

The allocated sites and windfall within the Neighbourhood Plan (316 dwellings), plus this proposal by Taylor Wimpy (295) would generate an estimated 152 (79+73) primary school pupils and, in order to meet the increase in demand, the school will need to expand to accommodate the potential 300 pupils (152 + 148) from a 210 place school to a 315 place school in the first instance. The county council will work with the school to plan the curriculum for the half-form approach. Expanding the school at the later stage to 420 places within its current site could remain within government guidance (Building Bulletin 103) on site area.

In the March 2018 response, the County Council highlighted that no feasibility work or discussion with the school has occurred. Since then, Suffolk County Council has raised the likely level of housing growth with the school and commissioned an initial feasibility of the options for extending the school within existing site. A copy of the report is attached, which highlights the potential options and for traffic to enter the site from The Butts and leave from a new access point on Aspell Road. The county council, as highway authority, has not yet formally considered this proposal. Furthermore, a new access will require agreement such as from landowners and the Environment Agency. The new access would be an additional cost beyond the standard per place approach. Therefore, total cost of enlarging the school might result in a higher CIL contribution than the £255,801 stated.

Given that there is potential for the school to expand within the site and the likely additional cost for relocation, the county council's view is that relocation would not be necessary or cost effective. This does mean, however, that parking and sustainable travel measures do need to be addressed by this application and through other development in the area. The County Council is aware of a policy in the Neighbourhood Plan for additional car parking associated with the school and has already made representation that, should this occur on the site to the East of Aspell road, a safe crossing would be required. In addition, there would need to be improvements to footpaths between the school and the rest of Debenham, including this location.

### **Debenham High School**

Debenham High School is an 11-16 academy and the school is currently working to a Pupil Admissions Number (PAN) of 135 in each year group and is currently a 675 place, five form of entry (FE) secondary school based on groups of 27 pupils. The school is located on a 3.67-hectare site (which is already undersized for a 675 place secondary school) and there have been various additions to the original building including some two-storey classroom extensions. In addition, there is a Children's Centre that is housed in an attached building towards the front of the site.

The current forecast for Debenham High is presented below.

Capacity	95%	Actual (2018-19)/Forecast Pupil Numbers				
		2018-19	2019-20	2020-21	2021-22	2022-23
720	684	670	664	650	640	632

Since the previous consultation, the County Council has made some detailed analysis of the existing building and learned that Debenham High School has a technical capacity of 720, rather than the previously stated 654. This is based on technical assessment of the floorspace available following Government guidelines such as Building Bulletin 103. The school is an academy and can make modifications to facilities without informing the County Council, which is why this was not known in previous consultations for this development and the regulation 14 neighbourhood plan consultation.

The growth of 611 homes (316+295) proposed by the Neighbourhood Plan and this Taylor Wimpy proposal would generate an estimated 109 (57+52) pupils, taking the school above the 95% capacity by 2022. An additional 109 pupils would increase the total from 632 in 2022 to 741.

In 2022, there is forecast to be 632 pupils and a 95% capacity level of 684 based on the technically available floorspace. Based on this, the capacity of 52 already provides for the likely additional demand from this development. Therefore, based on technical guidelines, the estimated requirement for contributions from CIL is **£0**.

Whilst there has been an increase in capacity which is technically available, the school is concerned about the practical capacity beyond the current PAN – the 675 places. Using the school's preference as the basis of the existing capacity and to enlarge from its current PAN, the resultant CIL contribution would be £789,295. This is based on nine available places, the 43 additional places and a per place cost of £18,355.

In responding to the Neighbourhood Plan consultation, Suffolk County Council advised that the growth in the Neighbourhood Plan could be accommodated by internal reconfiguration of the school. This has been based on a detailed review of the existing school and its curriculum (which alters the need for different types of classroom for example). A 810 place school can be achieved by remodelling the existing internal layout, such as using some of the smaller rooms to provide science rooms. The changes would only be required at ground floor level.

Internal reconfiguration was an option identified that could take the school up to 810 places (770 at 95% capacity) without additional land (although the site would still be undersized). Therefore, with a total of 741 pupils from this proposal and the Debenham Neighbourhood Plan, there would be space within the school for it to operate at 95% capacity. The cost of this reconfiguration is not yet known, but the per pupil place calculation remains appropriate as a basis for estimating the potential contribution by development through CIL.

This is not the optimum solution, as the school still requires use of the leisure centre for physical education and parking. It is the County Council's understanding that this is an informal agreement and would recommend formalising it to ensure the school retains parking and sports facilities. Any further growth within the catchment of the high school could mean the school needs to expand further to a 945 place school, which will require extending the building. Additional land would also be required in this situation, in order to provide additional outdoor sports facilities, such as a running track or the reprovision of existing courts through a multi-use games area. The table below highlights the additional land that would be required to meet the minimum recommended site areas.

	Existing Site Area (m <sup>2</sup> )	Minimum BB103 Recommended Site Area (m <sup>2</sup> )	Difference (m <sup>2</sup> )
675 Places (5FE)	36,660	42,750	6,090
810 Places (6FE)	36,660	49,500	12,840
945 Places (7FE)	36,660	56,250	19,590

Enlarging the school to 945 places results in the need to build on the existing tennis courts, which would need to be provided elsewhere. This could be through a new Multi-Use Games Area and, given the area constrains, this would be through an extension to the existing site area or alternative provision nearby with agreement of the school.

#### *Additional land in the academy's ownership*

The academy owns additional land (title SK3464406) to the south beyond the existing boundary. However, low voltage power lines cross this parcel of land which limits the activity that could safely take place underneath.

#### *Sports Hall*

If the school were to increase to 945 places, it would require a 594m<sup>2</sup> Sports Hall. The existing sports hall in the leisure centre is 544m<sup>2</sup>, so is undersized by 50m<sup>2</sup>. An arrangement with the leisure centre could continue, in theory, if the school were to expand to 945 if the school felt they could manage that volume of pupils moving between the two sites.

A new dedicated sports hall (594m<sup>2</sup>) for the school would be a longer-term solution if the school were to be enlarged to 945 places. This, and the provision of a suitable running track, would result in the need for the site area to be increased.

#### *Athletics Track*

A standard 6-lane 400m athletics track is required even for the existing capacity, this can overlay other pitches such as a football pitch.

A track could be positioned within the existing school site but it compromises safety run-off zones at the edges next to the existing all-weather pitch and the tree lined boundary, where protruding roots might be a trip hazard. Options to mitigate the safety run-off could be to reduce the number of lanes (retaining 6 on the sprint straight only), or to reduce the track to a 200m track but this would not be ideal.

## Car Parking

Additional spaces would be required through a planning permission if further floorspace (e.g. to 945 places) was to be created.

The school has highlighted the potential for the existing staff parking to be relocated and the existing area used for buses. Whilst this would make an improvement, additional car parking would only be a requirement if the floorspace of the school was increased (requiring planning permission). This would not need to occur unless additional homes, beyond the sites in the Neighbourhood Plan and this Taylor Wimpy proposal were to be permitted (or allocated) within this school's catchment. Furthermore, developments within Debenham, such as this proposal, would not generate the need for pupils to travel to the school by bus.

## Children's Centre

The High Suffolk Children's Centre currently operates from the adjacent site. The Centre would need to be relocated if this building were to be used for secondary education.

## Secondary School Summary

Expanding the school without additional land for sports, parking and bus manoeuvring is not the optimum solution, as the school still requires use of the leisure centre for physical education and parking. It is the County Council's understanding that this is an informal agreement and would recommend formalising it to ensure the school retains parking and sports facilities. The above assessment does not include a potential increase in pupils from other developments within the schools' catchment that might come through a review of the local plan. Therefore, there is need to reserve land within the Taylor Wimpy site for a replacement of the tennis courts and for staff parking (which could facilitate improved bus parking and manoeuvring) until alternative areas secured or after 10 years.

## Waste

As previously stated, Suffolk County Council has instigated a project to identify a new HWRC site for the Stowmarket catchment area and has allocated a budget for the site search. The likely cost of a new HWRC has now been estimated as between £3m and £5m. The resultant contribution (through CIL) would now be £110 per household from any significant development in this area, which results in a requirement of **£32,450** from this development.

I trust the above assists with Mid Suffolk District Council's consideration of the application.

Yours sincerely,

James Cutting  
Planning Strategy Manager  
Growth, Highways and Infrastructure

From: Tony Bass  
Sent: 08 February 2018 13:26  
To: BMSDC Planning Area Team Blue  
Subject: RE: MSDC Planning Consultation Request - DC/17/06293

Planning Team Blue,

Apologies for the delayed response, but following an initial discussion with John Pateman -Gee, I consider that there is an opportunity to further consider the potential for enhance youth play provision associated with the development. I am shortly to receive the results from Open Spaces Survey of the area and will be able to use this information to develop a more detailed response.

Tony Bass  
Strategic Leisure Advisor  
Babergh and Mid Suffolk District Councils - Working Together  
T: 07803 705803  
tony.bass@baberghmidsuffolk.gov.uk

## MID SUFFOLK DISTRICT COUNCIL

### MEMORANDUM

TO: John Pateman-Gee – Senior Planning officer  
From: Julie Abbey-Taylor, Professional Lead – Housing Enabling  
Date: 22/02/2018

SUBJECT: - **Application Reference: DC/18/06293**

Proposal: Application for Outline Planning permission for the erection of up to 295 dwellings, potential primary school or community/care use on land to the north of Gracechurch Street, Debenham.

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### Key Points

#### 1. Background Information

A development proposal for two hundred and ninety-five (295) residential dwellings
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This is an open market development and should offer 103 affordable housing units which = 35%.
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#### 2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **94 new affordable homes per annum. Ref1**

2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

Ref2 Estimated proportionate demand for affordable new housing stock by bedroom number	
Bed Nos	% of total new affordable stock
1	46%
2	36%
3	16%
4+	2%

2.4 This compares to the estimated proportionate demand for new housing stock by bedroom size across all tenures.

<b>Ref3 Estimated proportionate demand for all tenure new housing stock by bedroom number</b>	
Bed Nos	% of total new stock
1	18%
2	29%
3	46%
4+	6%

2.5 The Council's 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property-owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are the key drivers for this increased demand for smaller homes.

2.6 The Council's Choice Based Lettings system currently has circa.890 applicants registered for affordable housing in Mid Suffolk at November 2017.

2.7 A Local Housing Needs survey was carried out by Community Action Suffolk in partnership with the Parish and District Council in 20xx.

2.8 The Council's Choice Based Lettings system currently has 20 applicants registered for affordable housing, who are seeking accommodation in Debenham as at 2017. This site is a S106 planning obligation scheme, so the affordable housing provided will be to meet district wide need hence the **890** applicants registered is the important number.

**3. Preferred Mix for Open Market homes.** The preferred open market mix: -

- 10% x 2 bed bungalows
- 10% x 3 bed chalet bungalows
- 25% x 2 bed houses
- 40% x 3 bed houses
- 15% x 4 bed houses

The inclusion of the bungalows would be welcomed as this will provide opportunities for older people to downsize and free up family accommodation in the village.

- The **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:
  - 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or

semi-detached houses. Although this is not their first preference, many accept that the private rented sector is their most realistic option.

- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

#### 4. Preferred mix for Affordable Housing

4.1 The most recent information from the Mid Suffolk's Council's Housing Register shows 20 applicants registered who have a connection to Debenham.

4.2 103 of the proposed dwellings on the development will be for affordable housing. These should be provided in the form of: -

Rented 75% = 77 dwellings: -

- 6 x 1 bed 2-person flats @ 50sqm
- 8 x 1 bed 2-person houses @ 58 sqm
- 6 x 2 bed 4-person bungalows @ 70 sqm
- 8 x 2 bed 4-person flats @ 70 sqm
- 37 x 2-bedroom 4-person houses at 79 sqm
- 10 x 3 bed 5-person houses @ 93 sqm
- 2 x 3 bed 6-person houses @ 102 sqm

Shared ownership 25% = 26 dwellings: -

- 4 x 2 bed 4-person bungalows @ 70 sqm
- 16 x 2 bed 4-person houses @ 79 sqm
- 6 x 3 bed 5-person house @ 93 sqm

**The above mix is requested and to be included in the S106 agreement.**

#### 5. Other requirements for affordable homes:

- Properties must be built to current Housing Standards Technical requirements March 2015 Level 1. **All ground floor 1 bed flats to be fitted with level access showers, not baths.**
- The council is granted 100% nomination rights to all the affordable units on initial lets and 75% on subsequent lets

- All affordable units to be transferred freehold to one of the Councils preferred Registered providers.
- Adequate parking provision is made for the affordable housing units including cycle storage for blocks of flats.

Julie Abbey-Taylor, Professional Lead – Housing Enabling

**From:**Nathan Pittam  
**Sent:**Tue, 27 Feb 2018 10:14:26 +0000  
**To:**John Pateman-Gee  
**Cc:**BMSDC Planning Area Team Blue  
**Subject:**DC/17/06293: EH - Air Quality

Dear John

**EP Reference : 235494**

**DC/17/06293: EH - Air Quality**

**Land To The North Of, Gracechurch Street, Debenham, STOWMARKET, Suffolk.**

**Outline Planning permission (all matters reserved) except for access immediately from the public highway, for: the erection of up to 295 dwellings, 2ha for potential primary school site etc**

Many thanks for your request for comments in relation to the above application. I have reviewed the application and do not believe that the development is likely to compromise the otherwise good air quality currently experienced at the development site and surrounding area being of a predominantly rural nature. I therefore have no objection to the proposed development from the perspective of air quality.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD

Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

**From:**Nathan Pittam  
**Sent:**Fri, 26 Jan 2018 20:38:22 +0000  
**To:**John Pateman-Gee  
**Cc:**BMSDC Planning Area Team Blue  
**Subject:**DC/17/06293: EH - Contaminated Land

Dear John

**EP Reference : 235493**

**DC/17/06293: EH - Contaminated Land**

**Land To The North Of, Gracechurch Street, Debenham, STOWMARKET, Suffolk.**

**Outline Planning permission (all matters reserved) except for access immediately from the public highway, for: the erection of up to 295 dwellings, 2ha for potential primary school site...**

Many thanks for your request for comments in relation to the above application. Having reviewed the application and the supporting Phase I Geoenvironmental Report I can confirm that I have no objection to the proposed development from the perspective of land contamination. As with all application, I would request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Kind regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD

Senior Environmental Management Officer

**BABERGH/MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Development Control.

For the attention of: John Pateman-Gee.

FROM: Ray Bennett, Environmental Protection Team.      DATE: 26.01.18.

Environmental Health-Noise/Odour/Light/Smoke.

YOUR REF: DC/17/06293.

SUBJECT: Outline Planning permission (all matters reserved) except for access immediately from the public highway, for: the erection of up to 295 dwellings.

ADDRESS: Land to The North of Gracechurch Street, Debenham, Suffolk.

---

Thank you for the opportunity to comment of the above planning application.

Whilst I have no objection in principle to this application, I do have some concerns about the likelihood of loss of amenity to surrounding residential dwellings during the groundworks and construction phases of the development and I would recommend the following conditions:

1. Hours of work.

All works and ancillary operations, which are audible at the site boundary, or at such other place as may be agreed with the Council, shall be carried out only between the hours of 8am and 6pm on Mondays to Fridays and between the hours of 9am and 1pm on Saturdays and at no time on Sundays and Bank Holidays. Deliveries/collections shall only be made during these hours.

Reason – To minimise detriment to nearby residential amenity.

2. Construction Management Plan.

No development shall commence until a construction management plan has been submitted to and approved in writing by the Local Planning Authority. The construction management plan shall include details of:

- Operating hours (to be as above).

- Means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors).
- Loading and unloading of plant and materials.
- Wheel washing facilities.
- Lighting.
- Location and nature of compounds and storage areas (including maximum storage heights) and factors to prevent wind-whipping.
- Waste storage and removal.
- Temporary buildings and boundary treatments.
- Dust management measures.
- Noise and vibration management (to include arrangements for monitoring, and specifically for concrete breaking and any piling) and;
- Litter management during the construction phases of the development.

Thereafter, the approved construction plan shall be fully implemented and adhered to during all phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Note. The applicant should have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites.

Reason – To minimise detriment to nearby residential amenity.

### 3. Smoke.

During any ground works/demolition/construction no burning of materials on the site.

Reason – To minimise detriment to nearby residential amenity.

### 4. Light.

Any external lighting associated with the development both during construction and as part of the proposal shall be kept to the minimum necessary for the purposes of security and site safety and shall prevent upward and outward light radiation.

Reason – To minimise detriment to nearby residential amenity.

Thank you

Ray Bennett  
Environmental Protection officer

Midlands and East (East)  
Swift House  
Hedgerows Business Park  
Colchester Road  
Chelmsford  
Essex CM2 5PF  
Email address: [kerryharding@nhs.net](mailto:kerryharding@nhs.net)  
Telephone Number – 0113 824 9111

Your Ref: DC/17/06293  
Our Ref: NHSE/MIDS/17/06293/KH

Planning Services  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Needham Market, IP6 8DL

24 January 2018

Dear Sirs,

**Outline Planning permission (all matters reserved) except for access immediately from the public highway, for: the erection of up to 295 dwellings, 2ha for potential primary school site or community/care use, and two new vehicular accesses from Gracechurch Street, together with associated developments including flood alleviation and attenuation features; associated public open space and landscaping; and other infrastructure and utilities.**  
**Land To The North Of, Gracechurch Street, Debenham.**

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' submission the following comments are with regard to the Primary Healthcare provision on behalf of NHS England Midlands and East (East) (NHSE), incorporating Ipswich and East Suffolk Clinical Commissioning Group (CCG).

### **Background**

2. The proposal comprises a development of up to 295 residential dwellings and potentially care use, which is likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

### **Review of Planning Application**

3. There is 1 main GP practice within a 2km radius of the proposed development, Debenham Group Practice (including its branch surgeries at Grundisburgh and Otley). This GP practice does not have sufficient capacity for the additional growth resulting from this development and known cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

## **Healthcare Impact Assessment**

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.
5. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity and range of services within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment or extension, would be sought from the CIL contributions collected by the District Council.
6. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to reconfigure or extend the above mentioned surgeries. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

## **Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising**

7. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.
8. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.
9. NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Mid Suffolk District Council.

NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully

**Kerry Harding**  
Head of Estates

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: FS/F200898  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 15/01/2018

Dear Sir

**Land to the north of Gracechurch Street, Debenham**  
**Planning Application No: DC/17/06293**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

**Water Supplies**

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued

OFFICIAL

Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

Mrs A Kempen  
Water Officer

Enc: PDL1

Copy: Ms L Hindle, Boyer, 15 De Grey Square, De Grey Road, Colchester CO4 5YQ  
Enc: Sprinkler information

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: ENG/AK  
Enquiries to: Mrs A Kempen  
Direct Line: 01473 260486  
E-mail: Angela.Kempen@suffolk.gov.uk  
Web Address: www.suffolk.gov.uk

Date: 15 January 2018

**Planning Ref: DC/17/06293**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**  
**ADDRESS: Land to the north of Gracechurch Street, Debenham**  
**DESCRIPTION: 295 dwellings**  
**NO: HYDRANTS POSSIBLY REQUIRED: Required**

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued

OFFICIAL

Should you require any further information or assistance I will be pleased to help.

Yours faithfully

Mrs A Kempen  
Water Officer

Your Ref: DC/17/06293  
Our Ref: 570\CON\0066\18  
Date: 20<sup>th</sup> February 2018



**All planning enquiries should be sent to the Local Planning Authority.**

Email: [planningadmin@babberghmidsuffolk.gov.uk](mailto:planningadmin@babberghmidsuffolk.gov.uk)

The Planning Officer  
Mid Suffolk District Council  
1st Floor, Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**For the Attention of:** John Pateman-Gee

Dear John

**TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN DC/17/06293**

**PROPOSAL:** Outline Planning permission (all matters reserved) except for access immediately from the public highway, for: the erection of up to 295 dwellings, 2ha for potential primary school site or community/care use, and two new vehicular accesses from Gracechurch Street, together with associated developments including flood alleviation and attenuation features; associated public open space and landscaping; and other infrastructure and utilities.

**LOCATION:** Land to the North of, Gracechurch Street, Debenham, Suffolk

**ROAD CLASS:**

Notice is hereby given that the County Council as the local highway authority does not object to the proposal subject to the imposition of the conditions shown below on any permission to be granted and the completion of a S106 planning obligation to its satisfaction:

**Comments**

1. The role of the Highway Authority is to protect the users of the public highway. The Highway Authority do not have grounds to recommend refusal on this application as the safety aspects associated with the proposals on Gracechurch Street are acceptable. It does accept that the current scheme as proposed has made significant improvements in terms of the potential risk to pedestrians. The proposed alterations in the Highway will be subject to a planning condition required to deliver highway works. The highway works agreement (Section 278 agreement) the developer will be required to enter into to deliver the conditioned works, will include the appropriate safety audits and technical approvals in due course.
2. We consider the proposal to include a pedestrian crossing facility at Gracechurch Street/Little Back Lane acceptable in the interest of highway safety. The intension will be for the developer to enter into an unilateral undertaking with SCC to create the Traffic Regulation Order (TRO) to introduce the proposed waiting restrictions.

3. We recommend that the applicant considers waiting restrictions near the accesses to the development as these may become obstructed during school drop off/pick up times.
4. We consider further pedestrian improvements on Derry Brook Lane and The Butts should be investigated, especially near the school, as this is the desire line for residents of the development to the existing Primary School. As there are no footways due to the edge of the river on one side and hedgerows / banks on the other, there are limited areas where pedestrians can take refuge if a vehicle wishes to pass. Although it is accepted that a high proportion of drivers using the access will be local residents who are familiar with the conditions, these roads are narrow and insufficient for the increased intensification. This is to ensure the availability of pedestrian from the site, to promote, encourage and support the principles of sustainable transport as in the NPPF.
5. If flood alleviation feature and Suds basins are designed to be above the highway, the retaining wall / earthworks must both strong and leak proof to avoid any risks of flooding onto the highway.

## Conditions

If the Local Planning Authority is minded to approve this application, then the following highway conditions will be appropriate:

### 1 ER 1

Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that roads/footways are constructed to an acceptable standard.

### 2 ER 2

Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

### 3 V 1

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. U491\_200B with an X dimension of 2.4m and a Y dimension of 90m and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) 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 in order to take avoiding action.

### 4 P 2

Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including secure cycle storage and electric vehicle charging infrastructure 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 the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

## 5 B2

Condition: Before the development is commenced details of the areas to be provided for storage of Refuse/Recycling bins 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 for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users.

## 6 D 2

Condition: 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.

## 7 HGV1

Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) details of proposed means of dust suppression
- h) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- j) monitoring and review mechanisms.
- K) Details of deliveries times to the site during construction phase

Reason: To reduce and / or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

## 8 NOTE 07

The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

## 9 NOTE 15

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification. The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

## 10 NOTE 19

The public right of way Footpath 46 cannot be lawfully driven along without due authority and must remain unobstructed at all times. It is an offence to disturb the surface of the highway so as to render it inconvenient for public use. Therefore it is imperative that the surface is properly maintained for pedestrian use during the construction phase and beyond.

## **S106 Contributions**

### Public Transport

Gracechurch Street is on the route of our sponsored 114 service between Ipswich and Diss and also has other trips into Ipswich and would benefit from the bus route entering into and loop around the

development to and from Gracechurch Street therefore, new stops within the site (two pairs of stops to be equipped with the usual raised kerbs, shelters and real-time screens).

If it is not considered desirable by the applicant for services to use the new development, the next option would be to improve the stops on Gracechurch Street. The stops outside and opposite the high school are currently unmarked. Improvements should include new shelters and raised kerbs. The northern stop is to be included as part of the development and the southern can either be included in the construction under s278 or contribution of £30,000 is required. Please note, the bus stops will need to be protected with Clearway markings of at least 23m long.

#### Travel Plan

The Framework Travel Plan (dated December 2017) which was submitted to support the application identifies some strong measures to encourage residents to travel sustainably and reduce the vehicular impact on the local highway network. As the site is relatively rural, there is very little extra that the applicant could do to improve the Travel Plan.

There is one minor issue in regards to the monitoring methodology, as the Automatic Traffic Count should be implemented for a two week period. This is to ensure a suitable average vehicular trip rate can be obtained and compared against the predicted vehicular trip rate identified in the supporting Transport Assessment (dated December 2017). This issue can be addressed by submitting a revised Travel Plan, or Technical Note to acknowledge that the amendment will be made.

To ensure that the Travel Plan is implemented and monitored in full, the following Section 106 obligations will be required if the application is permitted, as planning conditions are unlikely to be sufficient due to the size and possible phasing of the development:

- Approval and implementation of the Framework (Interim) Travel Plan (the Travel Plan can also be appended to the Section 106 agreement)
- Provision of an approved welcome pack to each resident on first occupation
- Approval and full implementation of the Full Travel Plan
- Monitoring the Travel Plan for a minimum of five years after occupation of the 100th dwelling
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

All the contributions and obligations have taken into account CIL regulation 122 and are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

Full wording for the proposed Section 106 obligations can be supplied at a later date if planning permission is granted.

The need to have a suitable Travel Plan is a requirement of National Planning Policy Framework paragraph 32, 34, 35, 36, and the "Travel Plans, Transport Assessments and Statements" section of the 2014 Planning Practice Guidance. Also, a decent quality Travel Plan will also support Core Strategy Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

#### Public Rights of Way

The Rights of Way team are currently looking at this application and will be submitting their requirements soon.

Yours sincerely,

**Sam Harvey**  
**Senior Development Management Engineer**  
Strategic Development



## Developments Affecting Trunk Roads and Special Roads

### Highways England Planning Response (HEPR 16-01)

### Formal Recommendation to an Application for Planning Permission

From: Martin Fellows  
Operations (East)  
[planningee@highwaysengland.co.uk](mailto:planningee@highwaysengland.co.uk)

To: Mid Suffolk District Council

CC: [growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: DC/17/06293

Referring to the planning application referenced above, dated 11 January 2018, application for the erection of up to 295 dwellings, 2ha for potential primary school site or community/care use and two new vehicular accesses from Gracechurch Street, together with associated developments including flood alleviation and attenuation features, land to the north of Gracechurch Street, Debenham, Suffolk, notice is hereby given that Highways England's formal recommendation is that we:

- a) offer no objection;
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- ~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is / is not relevant to this application.<sup>1</sup>

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

**Signature:**

**Date:** 31 January 2018

**Name:** David Abbott

**Position:** Spatial Planner

**Highways England:**

Woodlands, Manton Lane  
Bedford MK41 7LW

[david.abbott@highwaysengland.co.uk](mailto:david.abbott@highwaysengland.co.uk)