

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 16 Jun 2021 03:32:36

To:

Cc:

Subject: FW: Debenham Parish Council- Planning Comments- DC/21/02982-Land East of Aspoll Road

Attachments:

From: Dina Bedwell <parish.clerk@debenhamparishcouncil.org>

Sent: 14 June 2021 23:24

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: Kathie Guthrie (Cllr) <Kathie.Guthrie@midsuffolk.gov.uk>

Subject: Debenham Parish Council- Planning Comments- DC/21/02982-Land East of Aspoll Road

To whom it may concern:

The Debenham Parish Council 's comments on the above application are as follows:

The Parish Council supports the planning application in principle.

However, it objects to the application on a number of specific grounds, as follows:

Debenham Neighbourhood Plan

The proposal is currently contrary to NP Policy 2c) and Policy 14 a) and b) due to the lack of landscaping to the site boundaries.

NP Policy 2 c): *All development proposals for sites adjoining the settlement boundary must avoid hard edges with the existing built-up boundaries, and with the countryside by creating landscape buffers.*

NP Policy 14 a) and b): *The design and layout of new development on or close to the edge of the village should take account of, respect, and seek to preserve the character of the adjacent countryside, green spaces, and landscape setting by providing appropriate landscaping, open areas and tree planting to act to help, to assimilate the proposal into its context; and b) in order to maintain the historic landscape character of the village, new developments should avoid upper valley sides and ridgelines. In order to mitigate the impact of development on lower slopes, substantial landscape belts should be provided on upper valley sides and ridgelines.*

Highway's safety and access grounds (note SCC Highways holding objection)

There are insufficient measures for a safe pedestrian and cycle access from the site to the school and the rest of the village.

Our recommendation to improve this access would include a 2.4m wide paved shared fenced footpath/cycleway, on the East side of the application site, with crossing across Aspoll Road to the Primary School; Together with a priority system on the narrowed Aspoll Road, thereby slowing down vehicles entering and leaving the village through Aspoll Road, adjacent to the Primary School.

Our recommendation would also include the provision of paved shared pedestrian and cycle access from the site to Priory Lane.

Please note- *The submitted plans appear to include a pedestrian route across the Debenham Cemetery. This has not been discussed or agreed upon with the landowner (the Debenham Parish Council).*

Flood Risk Grounds (note SCC Floods Planning holding objection)

The report submitted by the applicant states that the site access will be impassable during peak flood events. Insufficient measures have been put in place to mitigate the flooding on the access to the site and further down the village.

General Safety

The construction site is next to a primary school, in addition to being very close to the High Street and the centre of the village. The lack of a detailed construction management plan for the site had been noted.

It is recommended that a robust site management plan is prepared and is duly considered by the planning authority.

Affordable Housing: This provision has not been defined. The Parish Council asks MSDC to ensure that, based on their Housing Needs Survey, this affordable housing is genuinely affordable and is not withdrawn later on in the planning process due to financial or any other reasons. There is a clear need for genuinely affordable housing in Debenham.

Additional suggestions:

It is suggested that in regard to the land shown in the plan as "open space", the unencumbered freehold could be transferred to the Parish Council, with a covenant that it is solely used for community use, including cemetery provision but excluding housing development. Such transfer should be accompanied by a commuted sum to ensure its future maintenance.

In addition, a developer contribution could also be made towards the Debenham Play Strategy. With one of Debenham's main play areas/recreation grounds being adjacent to the site, with a direct access route, the improvements to the provision would benefit any new residents and potentially be capitalised on by the developer.

The developer is strongly encouraged to engage with the Education Authority and the Highways Authority in terms of agreeing on safe access/traffic/parking between the site and the School (other areas have already been highlighted). The school benefits from a large section of land which could be considered for this purpose. Alternatively, consideration could be given to the creation of a bridge between the site and the other side of Aspoll Road.

It would be very beneficial, from an economic and environmental perspective, if the developer could consider the provision and inclusion of additional sustainable/green fuels rather than a dependency on solid fuels.

Should there be any queries, please do not hesitate to contact the Parish Council.

Kindest regards,
Dina

Mrs Dina Bedwell, BEd (Hons), CPE, CiLCA
Parish Clerk and Responsible Financial Officer- Debenham Parish Council
Office Hours: Monday, Tuesday and Friday 9.30am to 3.30pm
Tel. 01473 787861 (messages may be left on answermachine)

Thank you for contacting the Debenham Parish Council. Should a response to your e-mail be necessary, we aim to respond within the next seven working days.



parish.clerk@debenhamparishcouncil.org

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Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 07929 786955 or email planningliaison@anglianwater.co.uk

AW Site Reference: 174913/1/0123130

Local Planning Authority: Mid Suffolk District

Site: Land East Of Aspoll Road Debenham
Suffolk IP14 6QA

Proposal: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

Planning application: DC/21/02982

Prepared by: Pre-Development Team

Date: 26 May 2021

ASSETS

Section 1 - Assets Affected

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Debenham Water Recycling Centre that will have available capacity for these flows

Section 3 - Used Water Network

This response has been based on the following submitted documents: Application Form, Site Location Plan, Flood risk assessment/drainage strategy pt 1, Flood risk assessment/drainage strategy pt 2, Flood risk assessment/drainage strategy pt 3 The sewerage system at present has available capacity for these flows. For a gravity connection into B1077. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

Section 4 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

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 in 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.



Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 07929 786955 or email planningliaison@anglianwater.co.uk

AW Site Reference: 174913/1/0133912

Local Planning Authority: Mid Suffolk District

Site: Land East Of Aspoll Road Debenham
Suffolk IP14 6QA

Proposal: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping

Planning application: DC/21/02982

Prepared by: Pre-Development Team

Date: 26 October 2021

ASSETS

Section 1 - Assets Affected

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

The foul drainage from this development is in the catchment of Debenham Water Recycling Centre that will have available capacity for these flows

Section 3 - Used Water Network

This response has been based on the following submitted documents: Indicative Drainage Strategy. The sewerage system at present has available capacity for these flows. For a gravity connection into B1077. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.


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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 in 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.

From: Vanessa Pannell <Vanessa.Pannell@babberghmidsuffolk.gov.uk>
Sent: 03 Nov 2021 02:15:39
To:
Cc:
Subject: FW: DC/21/02982 Land East of Aspal Road Debenham
Attachments: DM Checklist.docx

From: Ipswich, Planning <planning.ipswich@environment-agency.gov.uk>
Sent: 03 November 2021 13:51
To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>
Subject: RE: DC/21/02982 Land East of Aspal Road Debenham

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Good Afternoon

Thank you for your email. There are no constraints within our remit and therefore we have no comments.

Kind Regards

Liam

Liam Robson

Sustainable Places Planning Advisor – East Anglia Area (East)

Environment Agency | Iceni House, Cobham Road, Ipswich, Suffolk, IP3 9JD

Please be aware that due to COVID-19 – any post will not be picked up. Please direct all correspondence electronically.

liam.robson@environment-agency.gov.uk

External: [02084 748 923](tel:02084748923) | Internal: [48923](tel:48923)

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- GOV.UK/coronavirus



Consulting the Environment Agency

On Planning Consultations

October 2015

This form is designed to be completed by a Local Planning Authority and sent to the Environment Agency with a planning application or pre-application enquiry. The form should be used to explain why we are being consulted.

We will only respond to consultations that fall into one or more of the categories on this form.

Pre-application and planning application consultations

Category	Description	Reason for consulting EA
Cemeteries	Development relating to using land as a cemetery, including extensions.	<input type="checkbox"/>
Coastal erosion	Development (excluding minor development) located within Coastal Change Management Areas, as defined by the LPA.	<input type="checkbox"/>
Environmental Impact Assessment (EIA)	Development requiring an EIA, including scoping opinions and the environmental statement.	<input type="checkbox"/>
Flood risk	Development, other than minor development or as defined in our FRSA , which is carried out on land: <ul style="list-style-type: none"> • within Flood Zone 2 or 3, or • in an area within Flood Zone 1 which has critical drainage problems as notified by the Environment Agency. 	<input type="checkbox"/>
Groundwater protection	Potentially contaminating development ^{1 2} located in Source Protection Zones.	<input type="checkbox"/>
Hazardous waste/Control of Major Accident Hazard Regulations (COMAH) Sites	Development: <ul style="list-style-type: none"> • of new establishments, or • modifications to existing establishments which could have significant repercussions on major accident hazards, or • within 250 metres, where the siting or development would increase the risk or consequences of a major accident. 	<input type="checkbox"/>
Intensive farming	Development of intensive animal farming (such as pig or poultry) that may require an Environmental Permit ³ .	<input type="checkbox"/>
Pollution from land contamination	Development on land where a previous use ¹ of the site may have caused contamination.	<input type="checkbox"/>
Mineral Extraction	Development involving or including mineral and mining operations and restoration schemes relating to such development.	<input type="checkbox"/>
Oil and fuels	Development for the purpose of refining or storing non-domestic oils and their by-products.	<input type="checkbox"/>

Refuse or waste	Development that includes: <ul style="list-style-type: none"> the storage or spreading of sludge or slurry, or the storage, transfer, process, treatment and / or use of refuse or waste. 	<input type="checkbox"/>
Non-mains drainage	Major development proposing to use non-mains foul drainage.	<input type="checkbox"/>
Works affecting a watercourse	Development involving carrying out works or operations in the bed of or within 20 metres (or other distance as advised by your local Environment Agency Area Sustainable Places team) of the top of the bank of a Main River.	<input type="checkbox"/>
Discharge / variations of Conditions	Only consultations where the Environment Agency has requested the condition be attached to the planning permission.	<input type="checkbox"/>
Planning appeals –	Only appeals related to an Environment Agency objection or recommended condition.	<input type="checkbox"/>

Endnotes -

¹ - As defined on gov.uk, [Land contamination DoE industry Profiles](#)

² - This type of development also includes the storage of potentially contaminating substances as defined in DoE industry profiles

³ - An environmental permit is required for the development of or expanding of, an existing facility with more than 750 sows or 2,000 production pigs over 30kg or 40,000 poultry

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 26 May 2021 03:39:45

To:

Cc:

Subject: FW: DC/21/02982 Consultation Response

Attachments:

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Sent: 26 May 2021 12:14

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: DC/21/02982 Consultation Response



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Dear Alex Scott,

Application ref: DC/21/02982

Our ref: 354427

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours sincerely,

Dominic Rogers
Consultations Team
Natural England
Hornbeam House, Electra Way
Crewe, Cheshire, CW1 6GJ

Enquiries line: 0300 060 3900

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

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Please continue to send any documents by email or contact us by phone to let us know how we can help you.

See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Stay Home. Protect the NHS. Save Lives.

Thriving Nature
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-----Original Message-----

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 21 May 2021 18:03

To: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>

Subject: MSDC Planning Consultation Request - DC/21/02982

Please find attached planning consultation request letter relating to planning application - DC/21/02982 - Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA

Kind Regards

Planning Support Team

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From: SM-NE-Consultations (NE)

Sent: 25 October 2021 18:38

Subject: Planning consultation DC/21/02982 Natural England response

Dear Alex Scott

Application ref: DC/21/02982

Our ref: 371992

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published [Standing Advice](#) which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on [ancient woodland and veteran trees](#) which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours sincerely

Amy Knafler
Natural England
Consultation Service

From: Vanessa Pannell <Vanessa.Pannell@babberghmidsuffolk.gov.uk>

Sent: 31 Mar 2022 09:55:19

To:

Cc:

Subject: FW: LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA - . DC/21/02982

Attachments:

From: BMSDC Planning Area Team Blue

Sent: 24 March 2022 16:42

Subject: FW: LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA - . DC/21/02982

From: Cattier, Sophie <Sophie.Cattier@HistoricEngland.org.uk>

Sent: 24 March 2022 13:54

To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Subject: LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA - . DC/21/02982



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Dear Alex Scott

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA
Application No. DC/21/02982**

Thank you for your letter of 4 March 2022 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England provided advice in our letter dated 10th June 2021 where we raised concerns on heritage grounds as the development for 54 new dwellings would further erode the relationship of Debenham Conservation Area and the surrounding countryside. We considered that this development would result in less than substantial harm to Debenham Conservation Area through development within its setting. The amended Heritage Statement has now assessed the impact on the proposal on Debenham Conservation Area and also concluded there would be some harm to its significance, albeit minor.

Whilst we would accept that the construction of the new housing could be considered a public benefit and it is for the council to weigh this against any harm in terms of paragraph 202. We therefore recommend the Council consider this factor when seeking the 'clear and convincing justification' for the harm required by paragraph 200. If this justification is not found we recommend the application is refused.

The additional information does not address our concerns and we therefore refer you to our previous letter.

If you have any questions please do not hesitate to contact us.

Yours sincerely

Sophie Cattier

Sophie Cattier | Assistant Inspector of Historic Buildings and Areas
Direct Line: 01223 582740

Historic England | Brooklands
24 Brooklands Avenue | Cambridge | CB2 8BU

www.historicengland.org.uk

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Alex Scott
Babergh Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582740

Our ref: P01429186

10 June 2021

Dear Alex Scott

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990
LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA
Application No. DC/21/02982**

Thank you for your letter of 21 May 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

This application proposes the erection of 54 new dwellings (including 19 affordable units), creation of vehicular and pedestrian access and public open space, infrastructure and landscaping at Land East of Aspall Road, Debenham. The application site is currently an agricultural field to the north east of the village of Debenham. The site positively contributes to the significance of Debenham Conservation Area through it being an open field and provides an understanding of the historic relationship between the village and the surrounding countryside. Historic England objects to the application on heritage grounds as development of this site would result in harm to the significance of the conservation area through development in its setting.

Historic England Advice

Significance of the Historic Environment

Debenham is a village set in the Suffolk countryside between Stowmarket and Framlingham. In 1221 Debenham was granted its market and historically made its money through agricultural trades such as hemp weaving. The River Deben runs through the village from the north west and out to the south east, with footpaths leading down to the river from the settlements core. Along the High Street are many fine listed buildings and at the centre is the grade I listed Church of St Mary's, all of which attest to the prosperity of the medieval settlement. Debenham village has a linear form based around the village street. Buildings are set along this predominantly one plot deep on the roadside (a 'ribbon' form of development) with gardens behind and open fields beyond. Debenham runs north to south and when approaching or leaving the village the eastern side immediately opens out onto the surrounding countryside, this gives an appreciation and understanding of the historic relationship between the settlement and the countryside.





The proposed application site is to the north east of Debenham Conservation Area. The southern boundary of the application site marks the end of Debenham village with the grade II Debenham House and a small timber barn being the last structures on the eastern side as you leave the village. The site is an arable field which allows wider views out to the surrounding landscape.

Impact of the proposal

This application proposes the erection of 54 new dwellings and associated infrastructure. Development of the application site would result in the loss of an arable field to the north east of the conservation area and bring development beyond the historic line of linear development. This field currently contributes to the significance of Debenham Conservation Area through being an open field without development. It helps reveal the historic relationship of the settlement with its surrounding countryside which survives best on the eastern side of the village. Development on this site would further erode the relationship between the conservation area and the countryside, which has already been lost along the western edge of the conservation area. Modern development, for the most part, has been to the western side of the conservation area and we would suggest that any further development should also be located here as this would not have such a harmful impact on the conservation area.

Policy Context

The National Planning Policy Framework (NPPF) has at its heart the principle of sustainable development. This has three over-arching objectives which are described as interdependent and need to be pursued in mutually dependent ways: economic, social and environmental, paragraphs 7 and 8.

Paragraph 122 of the NPPF, in particular parts d and e state that planning decisions should take into account the area's prevailing character and setting and that securing well designed and healthy places is important.

In the historic environment section the document sets out how heritage assets are an irreplaceable resources and the desirability of sustaining and enhancing their significance, paragraphs 184 and 192. Paragraph 189 of the NPPF requires applicants to describe the significance of heritage assets affected by proposed development. Sufficient information should also be provided to enable an understanding of the potential impact of the development on the asset. It continues that great weight should be given to an asset's conservation (and the more important the asset, the greater that weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance, paragraph 193. Any harm or loss requires clear and convincing justification, paragraph 194. Where a proposal will lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, paragraph 196. Paragraph 200 states that local planning authorities should look for opportunities within the setting of designated heritage assets to enhance or better reveal their significance





The Historic Environment Good Practice Advice Note 3: The Setting of Heritage Assets provides more detail on this subject. It provides general advice on understanding setting and a staged approach to making decisions on setting issues.

Historic England's Position

The application failed to identify Debenham Conservation Area as a designated heritage asset and, so, did not consider the contribution made by its setting and therefore does not meet the requirement of paragraph 189. The removal of this open arable field would further remove the conservation area from its rural landscape which contributes to its historic significance.

We have considered this application in light of this government policy and consider that it would result in harm to the significance of Debenham Conservation Area through development within its setting. We object to the principal of development in this field and suggest that modern development be kept to the western side of Debenham which would cause less, if any, harm to the conservation area.

We would accept that the construction of the new housing could be considered a public benefit to be weighed against this harm in terms of paragraph 196. We therefore recommend the Council consider this factor when seeking the 'clear and convincing justification' for the harm required by paragraph 194. If this justification is not found we recommend the application is refused.

Recommendation

Historic England objects to the application on heritage grounds as the development for 54 new dwellings would further erode the relationship of Debenham Conservation Area and the surrounding countryside. This would result in harm to Debenham Conservation Area through development within its setting. We consider that the application [meets/does not meet] the requirements of the NPPF, in particular paragraph numbers 184, 189, 192, 193 and 194.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.





Historic England

Yours sincerely

Sophie Cattier

Assistant Inspector of Historic Buildings and Areas
E-mail: sophie.cattier@HistoricEngland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

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From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Sent: 21 Oct 2021 12:08:18
To:
Cc:
Subject: FW: Land East Of Aspall Road Debenham Suffolk IP14 6QA - DC/21/02982
Attachments:

From: Cattier, Sophie <Sophie.Cattier@HistoricEngland.org.uk>
Sent: 20 October 2021 16:12
To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Subject: Land East Of Aspall Road Debenham Suffolk IP14 6QA - DC/21/02982

Dear Mr Scott

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA
Application No. DC/21/02982**

Thank you for your letter of 15 October 2021 regarding further information on the above application for planning permission.

The amended information does not address our concerns set out in our letter of advice, dated 10 June 2021 and we refer you to this letter for detailed advice. We remain of the position that development of this open arable field would further remove the conservation area from its rural landscape which contributes to its historic significance consider that it would result in harm to the significance of Debenham Conservation Area through development within its setting. We object to the principal of development in this field and suggest that modern development be kept to the western side of Debenham which would cause less, if any, harm to the conservation area.

We would accept that the construction of the new housing could be considered a public benefit to be weighed against this harm in terms of paragraph 202. We therefore recommend the Council consider this factor when seeking the 'clear and convincing justification' for the harm required by paragraph 200. If this justification is not found we recommend the application is refused.

Historic England continues to object to the application on heritage grounds as the development for 54 new dwellings would further erode the relationship of Debenham Conservation Area and the surrounding countryside. This would result in harm to Debenham Conservation Area through development within its setting.

Yours sincerely

Sophie Cattier

Sophie Cattier | Assistant Inspector of Historic Buildings and Areas
Direct Line: 01223 582740

Historic England | Brooklands
24 Brooklands Avenue | Cambridge | CB2 8BU
www.historicengland.org.uk

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From: Vanessa Pannell <Vanessa.Pannell@baberghmidsuffolk.gov.uk>

Sent: 17 Nov 2021 03:19:16

To:

Cc:

Subject: IDOX-Public: Further Response received from Historic England - Planning Application Ref: DC/21/02982 - Land East of Aspal Road, Debenham - Erection of 54 dwellings

Attachments:

From: Cattier, Sophie

Sent: 11 November 2021 16:03

To: Alex Scott

Subject: RE: Historic England Responses - Planning Application Ref: DC/21/02982 - Land East of Aspal Road, Debenham - Erection of 54 dwellings



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Good afternoon Alex

Thank you for your email.

With regards to the Neighbourhood Plan we did respond to the Regulation 16 consultation we did not give extensive comments but provided links to our guidance on producing Neighbourhood Plans however we did also comment

'To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NP, where we consider these would have an adverse effect on the historic environment.'

With regards the emerging Local Plan, as you are aware this proposes a substantial number of sites spread across the two Local Planning Authority areas. Whilst we would like to provide detailed comments on each Historic England only has the capacity to focus on the most significant ones. To this end in our response to the Development Plan we stated the following:

Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues.

Finally, we should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.

As you are aware the Council the Councils' own evidence base (Heritage Impact Assessment of Local Plan Site Allocations – Stage 1: Strategic appraisal) also identifies the potential to setting change and considers it could have a negative impact. We consider that this change in setting would affect the significance of the CA.

SS0268	Land east of Aspal Road, Debenham	HER records that medieval finds have been recovered from site. It also indicates that the extent of medieval Debenham reached the site, suggesting a potential for associated remains. No assets identified from OS maps or Google imagery.	No designated assets in site. To the southwest is Debenham which would be sensitive to setting change. Also to the southeast, in the CA, are the GII Debenham House (former Farmhouse) and GII 50 Aspal Road (former dairy), both appear to also be sensitive to setting change, although the intervisibility of both with the site is low due to their orientation and intervening development/vegetation. To the north, the LBs - Gull Farmhouse and barn - are also potentially sensitive to setting change although again intervening topography/vegetation means that any intervisibility is low.
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The Debenham Conservation Area Appraisal also discusses the significance of the CA and its agricultural based trade which has resulted in the fine historic buildings found throughout the village.

The Heritage Statement produced alongside the live planning application does not reference the Conservation Area or its setting and therefore does not consider the impact of the proposal failing paragraph 194 of the NPPF. I understand that the site has been allocated in the NP and is being considered for the LP however we do have serious concerns regarding this site as this is where the historic core of the village ends and helps illustrate its historic and intrinsic

relationship to the surrounding countryside. Modern development has largely taken place to the east of the village however developing on this site would result in just the south western extent of the CA retaining its direct connection to the countryside. We do consider this would result in less than substantial harm to the Debenham Conservation Area through development within its setting. However the Council may consider the harm to be outweighed by the public benefit of providing housing for the area.

I hope this helps clarify our position but do let me know if you would like to discuss this further.

Kind regards

Sophie

Sophie Cattier | Assistant Inspector of Historic Buildings and Areas

Historic England | Brooklands
24 Brooklands Avenue | Cambridge | CB2 8BU
www.historicengland.org.uk

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From: Alex Scott
Sent: 02 November 2021 12:26
To: Cattier, Sophie
Cc: BMSDC Planning Area Team Blue
Subject: Historic England Responses - Planning Application Ref: DC/21/02982 - Land East of Aspal Road, Debenham - Erection of 54 dwellings

Good Afternoon Sophie

DC/21/02982 - Land East of Aspal Road, Debenham - Erection of 54 dwellings

I refer to the above planning application reference and to your attached consultation responses of the 10th June and 20th October 2021 regarding, raising objection to the principle of proposed development of the land in question, for reasons relating to the harm that result to the setting and significance of the village conservation area.

Further to this: Please may I request your confirmation that you have considered the site's allocation in the current adopted Neighbourhood Development Plan (which forms part of the current development plan) and the site's intended allocation in the emerging Development Plan (currently at examination stage), when composing your attached recommendations;

I am also unable to locate any formal objections from Historic England, in relation to the proposed site allocation, when formally consulted as part of the above development plan allocation processes. Is this correct please? And have further consideration come to light since the consultation periods on these plans have closed please?

Please confirm.

My Thanks and Regards

Alex Scott
Principal Planning Officer - Development Management

Sustainable Communities

Babergh and Mid Suffolk District Councils - Working Together

Tel: 0300 123 4000

Mob: 07860 826982

Email: planningblue@baberghmidsuffolk.gov.uk

Website: www.babergh.gov.uk www.midsuffolk.gov.uk

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From: Vanessa Pannell <Vanessa.Pannell@babberghmidsuffolk.gov.uk>

Sent: 31 Mar 2022 09:55:19

To:

Cc:

Subject: FW: LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA - . DC/21/02982

Attachments:

From: BMSDC Planning Area Team Blue

Sent: 24 March 2022 16:42

Subject: FW: LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA - . DC/21/02982

From: Cattier, Sophie <Sophie.Cattier@HistoricEngland.org.uk>

Sent: 24 March 2022 13:54

To: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Subject: LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA - . DC/21/02982



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Dear Alex Scott

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA
Application No. DC/21/02982**

Thank you for your letter of 4 March 2022 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England provided advice in our letter dated 10th June 2021 where we raised concerns on heritage grounds as the development for 54 new dwellings would further erode the relationship of Debenham Conservation Area and the surrounding countryside. We considered that this development would result in less than substantial harm to Debenham Conservation Area through development within its setting. The amended Heritage Statement has now assessed the impact on the proposal on Debenham Conservation Area and also concluded there would be some harm to its significance, albeit minor.

Whilst we would accept that the construction of the new housing could be considered a public benefit and it is for the council to weigh this against any harm in terms of paragraph 202. We therefore recommend the Council consider this factor when seeking the 'clear and convincing justification' for the harm required by paragraph 200. If this justification is not found we recommend the application is refused.

The additional information does not address our concerns and we therefore refer you to our previous letter.

If you have any questions please do not hesitate to contact us.

Yours sincerely

Sophie Cattier

Sophie Cattier | Assistant Inspector of Historic Buildings and Areas
Direct Line: 01223 582740

Historic England | Brooklands
24 Brooklands Avenue | Cambridge | CB2 8BU

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From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 07 Jun 2021 12:21:36

To:

Cc:

Subject: FW: DC/21/02982

Attachments:

From: planning.apps <planning.apps@suffolk.nhs.uk>

Sent: 07 June 2021 11:23

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: DC/21/02982



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The CCG have commented previously on this planning application and feel currently no further comment is required.

Regards

CCG Estates Planning

Ipswich & East Suffolk CCG & West Suffolk CCG
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
planning.apps@suffolk.nhs.uk



From: planning.apps <planning.apps@suffolk.nhs.uk>

Sent: 04 November 2021 09:09

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: DC/21/02982

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Hi Alex

As you will be aware the CCG previously commented on this application back in December 2020. I have reviewed the updated documents but see no reason to update our previous response. The CCG is working closely with BMSDC Infrastructure Team and thus are aware of our strategy in this area and we will be working on the new IFS very shortly. Should more information come out or the number of dwellings change drastically then we might like to update our response to reflect this but at this stage it is not required.

Regards

CCG Estates Planning

Ipswich & East Suffolk CCG & West Suffolk CCG
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
planning.apps@suffolk.nhs.uk



Your Ref: DC/21/02982
Our Ref: SCC/CON/0844/22
Date: 9 March 2022
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Alex Scott - MSDC

Dear Alex

TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/02982

PROPOSAL: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

LOCATION: Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA

Notice is hereby given that the County Council as Highway Authority make the following comments:

The recently submitted amended drawings do not change the position of the Highway Authority. Therefore, the recommended planning conditions, notes, comments and S106 contribution request from our response dated 23/11/21 (ref: SCC/CON/5113/21) still apply.

Any conditions that reference superseded drawings can be updated to reflect the current drawings (that remain acceptable).

Yours sincerely,

Ben Chester
Senior Transport Planning Engineer
Growth, Highways and Infrastructure

Your Ref:DC/21/02982
Our Ref: SCC/CON/2376/21
Date: 28 May 2021
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Alex Scott - MSDC

Dear Alex

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/21/02982

PROPOSAL: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

LOCATION: Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA

ROAD CLASS: B

Notice is hereby given that the County Council as Highway Authority make the following comments:

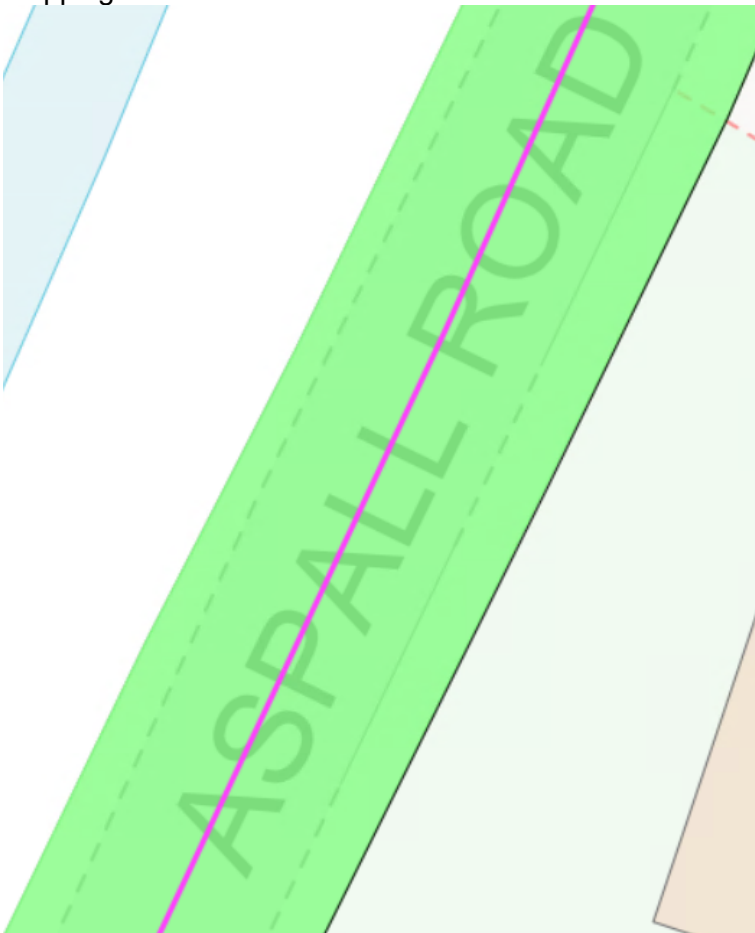
OBJECTION UNTIL THE FOLLOWING COMMENTS HAVE BEEN ADDRESSED

Offsite Highway Works:

1. Whilst the proposal to provide a 1.5 metre or 1.8 metre wide footway link (latter subject to minimal road narrowing) may be acceptable in principle, with the latter being preferable to the Highway Authority, it is unclear whether this proposal is feasible within the extent of the highway and/or land in control of the applicant.

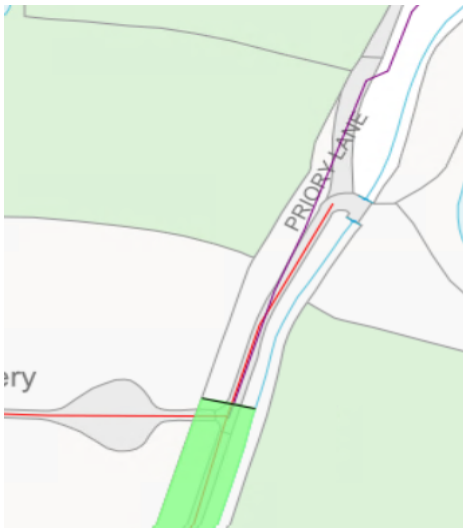
The extract overleaf from the Suffolk Highways mapping software shows the indicative highway boundary in green overlay in this location. Although indicative, it shows a 5.6 - 5.7 metre wide carriageway with a verge on the western side of between 1 metre and 1.4 metres wide. Given that a fence with substantial foundations would also need to be provided beyond the footway, there is a concern that a suitably wide footway and fence could not be provided within the highway and/or land in control of the applicant, whilst maintaining a suitably wide carriageway. It is suggested that further investigation is carried out to evidence that a suitable pedestrian connection to the site is deliverable.

Mapping Extract:



2. As raised in road safety audit, the proposal to provide a pedestrian crossing point at the very end of the footway next to an area of verge is not acceptable. The designer's response to clear the verge of hedgerow would not be a long term solution to addressing poor visibility as a result of vegetation growth, given that the verge is likely to be cut bi-annually. It is suggested that the crossing point is not located at the end of the footways, in order to prevent vegetation from growing close to the crossing point.

3. It is unclear whether the proposed link to Priory Lane forms a direct connection from the application site to the PROW (Public Rights of Way). There appears to be a gap between the red line boundary of the site and the PROW. The mapping extract below shows the extent of highway in this area in bright green. The proposed connection is north of this area so it may not be within land that is under the control of the applicant. Please clarify.



Development Layout:

4. This is generally acceptable, however the provision of laybys on the inside of a bend is not acceptable due to limited layby user and forward visibility when the laybys are in use.

Other Comments (not reasons for formal objection):

The principle and location of the proposed access junction is acceptable and we are satisfied that sufficient visibility splays for the measured speeds are achievable.

Parking provision is generally acceptable, although if the roads are to be adopted by the Highway Authority, quadruple width dropped kerbs onto a Minor Access Road are not acceptable. There is also an access shown across a speed restraint ramp that would not be acceptable.

SCC PROW Team Comments will be provided in due course.

Yours sincerely,

Ben Chester
Senior Transport Planning Engineer
Growth, Highways and Infrastructure

Your Ref: DC/21/02982
Our Ref: SCC/CON/4762/21
Date: 2 November 2021
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Alex Scott - MSDC

Dear Alex

TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/02982

PROPOSAL: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

LOCATION: Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA

Notice is hereby given that the County Council as Highway Authority make the following comments:

1. The updated 'indicative highways mitigation' drawing (ref: 275/2020/05 P4) does not appear to have been submitted to the planning authority. The improvements and details shown on that drawing will need to be subject to planning conditions.
2. The development layout is generally acceptable, however if it is to be adopted by the Highway Authority, forward visibility on the initial bend in the estate road will need to be maintained by the regular cutting of the proposed planting. In the absence of a roadside footway, it also may be necessary to provide a service strip in this area if utilities are to be required on that side of the road.
3. Due to the existing school related and general on-street parking issues around the development site area, that will be exacerbated by the proposal, as well as impact upon the development roads, a Section 106 contribution for a parking restriction bond will be requested by the Highway Authority. This bond would only be used if a parking issue that requires restrictions or other measures emerges within an agreed timescale from occupation of the development.
4. The proposed footpath link on drawing 003 agreed with the Parish Council is very much welcomed as it offers an alternative route from the proposed development. Ideally this would be surfaced for all weather use (although this is beyond the scope of the Highway Authority).

Yours sincerely,

Ben Chester
Senior Transport Planning Engineer
Growth, Highways and Infrastructure

Your Ref:DC/21/02982
Our Ref: SCC/CON/5113/21
Date: 23 November 2021
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Alex Scott - MSDC

Dear Alex

TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/02982

PROPOSAL: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

LOCATION: Land East Of, Aspell Road, Debenham, Suffolk IP14 6QA

Further to receiving additional information and submission of plans, notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

Condition: No other part of the development hereby permitted shall be occupied until the new access has been laid out and completed in all respects in accordance with drawing no. 003 D. Thereafter it shall be retained in its approved form.

Reason: To ensure the access is laid out and completed to an acceptable design in the interests of the safety of persons using the access and users of the highway.

Condition: A new footway and crossing point on Aspell Road as indicatively shown on drawing no. 275/2020/05 P4 shall be laid out and fully completed prior to the occupation of the first dwelling.

Reason: In the interests of highway safety and sustainable development by providing a footway at an appropriate time where no provision may deter people from walking.

Note: This condition wording may require amendment to include Bus Stop improvements.

Condition: The areas to be provided for the storage and presentation for collection/emptying of refuse and recycling bins as shown on Drawing No. 004 B shall be provided in their entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that space is provided for refuse and recycling bins to be stored and presented for emptying and left by operatives after emptying clear of the highway and access to avoid causing obstruction and dangers for the public using the highway.

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

Reason: In the interests of highway safety to ensure that roads/footways are constructed to an acceptable standard.

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.

Reason: In the interests of highway safety to ensure that satisfactory access is provided for the safety of residents and the public.

Condition: No development shall be commenced until details of landscaping that may impact upon the adopted highway have been submitted to and approved in writing by the Local Planning Authority and shall be carried out as approved.

Reason: In the interests of highway safety, to ensure new trees are not planted close to roads and that they have an approved root direction system to prevent damage to the roads and footways and to ensure that visibility splays remain unobstructed by proposed planting.

Condition: The use shall not commence until the area(s) within the site shown on drawing no. 003 D for the purposes of loading, unloading, manoeuvring and parking of vehicles has / have been provided and thereafter the area(s) shall be retained, maintained and used for no other purposes.

Reason: To ensure that sufficient areas for vehicles to be parked are provided in accordance with Suffolk Guidance for Parking 2019 where on-street parking and or loading, unloading and manoeuvring would be detrimental to the safe use of the highway.

Condition: Before any building is constructed above ground floor slab level details of the areas to be provided for the secure, covered and lit cycle storage including electric assisted cycles and electric vehicle charging infrastructure shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be implemented for each dwelling prior to its first occupation and retained as such thereafter.

Reason: To promote sustainable travel by ensuring the provision at an appropriate time and long term maintenance of adequate on-site areas and infrastructure for the storage of cycles and charging of electrically assisted cycles in accordance with Suffolk Guidance for Parking 2019.

Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. 275/2020/05 P4 with an X dimension of 2.4 metres and a Y dimension of 95 metres [tangential to the nearside edge of the carriageway] and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

Reason: To ensure drivers of vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

Notes:

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

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. For further information please visit:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/>

Note: The Local Planning Authority recommends that developers of housing estates should enter into formal agreements with the Highway Authority under Section 38 of the Highways Act 1980 in the interests of securing the satisfactory delivery, and long term maintenance, of the new streets.

For further information please visit:

<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/application-for-works-licence/>

Please note that this development may be subject to the Advance Payment Code and the addition of non statutory undertakers plant may render the land unadoptable by SCC Highways for example fogas and LPG.

S106 Contribution Request:

In order to make the development acceptable, we require a Section 106 contribution of £15,000 as detailed below:

Due to the existing school related and general on-street parking issues around the development site area, that will be exacerbated by the proposal, as well as impact upon the development roads, a Section 106 contribution for a parking restriction bond is requested by the Highway Authority. This bond would only be used if the parking issue requires restrictions or other measures emerges within an agreed timescale from final occupation of the development.

SCC Passenger Transport team comments:

We still have one route passing this site 5-6 times per day, so new residents could definitely be encouraged to use these for travel to Ipswich, Eye or Diss.

The issue will be access to the stops as there is no footway from the proposed site entry down to link up with the existing path at The Butts junction. I think the best we could ask for is for them to extend the footway at the entry and include a stop within that for southbound passengers. As there isn't room to build one opposite the site, we would want the kerb at the existing northbound stop raising. It will be a bit of a stagger between the two, but safer than no stops at all. This can be added to the S278 or £6,000 to do the lot.

Yours sincerely,

Ben Chester
Senior Transport Planning Engineer
Growth, Highways and Infrastructure

Your Ref: DC/21/02982
Our Ref: SCC/CON/0844/22
Date: 9 March 2022
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



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

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Alex Scott - MSDC

Dear Alex

TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/02982

PROPOSAL: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

LOCATION: Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA

Notice is hereby given that the County Council as Highway Authority make the following comments:

The recently submitted amended drawings do not change the position of the Highway Authority. Therefore, the recommended planning conditions, notes, comments and S106 contribution request from our response dated 23/11/21 (ref: SCC/CON/5113/21) still apply.

Any conditions that reference superseded drawings can be updated to reflect the current drawings (that remain acceptable).

Yours sincerely,

Ben Chester
Senior Transport Planning Engineer
Growth, Highways and Infrastructure

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 01 Jun 2021 10:13:10

To:

Cc:

Subject: FW: 2021-06-01 JS Reply Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA Ref DC/21/02982

Attachments:

From: GHI Floods Planning <floods.planning@suffolk.gov.uk>

Sent: 01 June 2021 07:43

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>

Subject: 2021-06-01 JS Reply Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA Ref DC/21/02982

Dear Alex Scott,

Subject: Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA Ref DC/21/02982

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/02982

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

- site Location Plan ref 001
- Planning Layout Ref DEB1 003 Rev B
- Flood Risk Assessment & Drainage Strategy Ref 275/2020/FRADS P2

A holding objection is necessary because whilst the applicant has assessed the flood risk, the surface water drainage strategy needs to be amended to ensure meet national and local policy's with regard to its proposed design elements have been met

The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required in order to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.

The points below detail the action required in order to overcome our current objection:-

1. Resubmit the proposed layout utilising above ground open SuDs for collection, conveyance, storage and discharge or demonstrate why this is not appropriate for this site
2. Resubmit the proposed layout with significant number of dwellings overlooking the lower basin
 - a. The dwellings should be located so a significant number overlook the detention basins to increase safety and enhance the dwellings streetscape.
3. Resubmit the drainage strategy utilising plot soakaways were possible or demonstrate why this is not possible
4. Demonstrate that the EA lead Debenham Flood Management Project has evolved and any required mitigation have been included with the FRA and Drainage Strategy
5. Submit a detailed landscaping and establishment plan (5 years) for all SuDs features
6. Resubmit the flood flow exceedance plan depicting the exceedance route from the proposed infiltration basins for events greater than a 1:100+CC event
7. Resubmit the cross sections of the basin depict the depths of water for 1:1, 1:30 and 1:100+CC
8. Resubmit the drainage layout with the infiltration trenches not within the side slopes/maintenance strip of the lower basin
9. Resubmit the hydraulic calculations using FEH or ICPSUDS

Note, further information may be required.

Kind Regards

Jason Skilton

Flood & Water Engineer
Suffolk County Council
Growth, Highway & Infrastructure
Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

****Note I am remote working for the time being****

From: Vanessa Pannell <Vanessa.Pannell@baberghmidsuffolk.gov.uk>

Sent: 20 Oct 2021 10:04:57

To:

Cc:

Subject: FW: 2021-10-19 JS Reply Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA Ref DC/21/02982

Attachments:

From: GHI Floods Planning <floods.planning@suffolk.gov.uk>

Sent: 19 October 2021 11:18

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>

Subject: 2021-10-19 JS Reply Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA Ref DC/21/02982

Dear Alex Scott,

Subject: Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA Ref DC/21/02982

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/02982

The following submitted documents have been reviewed and we recommend maintaining a **holding objection** at this time:

- Site Location Plan ref 001
- Planning Layout Ref DEB1 003 Rev B
- Flood Risk Assessment & Drainage Strategy Ref 275/2020/FRADS P2
- Letter from GH Bullard Ref 275/2020/01/JAH
- Indicative Drainage Strategy ref 275/2020/03 P8

A holding objection is necessary because no landscaping and establishment plan has been submitted.

The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required in order to overcome the objection(s). This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.

The points below detail the action required in order to overcome our current objection:-

1. Submit a detailed landscaping and establishment plan (5 years) for all SuDs features as no details can be found within the submitted documents
 - a. Unless directed by the LPA to include a pre commencement planning condition.

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council
Growth, Highway & Infrastructure
Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

****Note I am remote working for the time being****

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

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 14 Dec 2021 02:45:22

To:

Cc:

Subject: FW: 2021-12-14 JS Reply Land East Of, Aspall Road, Debenham IP14 6QA Ref DC/21/02982

Attachments:

From: GHI Floods Planning <floods.planning@suffolk.gov.uk>

Sent: 14 December 2021 14:24

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>

Subject: 2021-12-14 JS Reply Land East Of, Aspall Road, Debenham IP14 6QA Ref DC/21/02982

Dear Alex Scott,

Subject: Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA Ref DC/21/02982

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/02982

The following submitted documents have been reviewed and we recommend **approval subject to conditions** at this time

- Site Location Plan ref 001
- Planning Layout Ref DEB1 003 Rev B
- Flood Risk Assessment & Drainage Strategy Ref 275/2020/FRADS P2
- Letter from GH Bullard Ref 275/2020/01/JAH
- Indicative Drainage Strategy ref 275/2020/03 P8
- Attenuation Basin Planting Plan 7525.AB.PP.5.0

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

1. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (ref: Ref 275/2020/FRADS P2 & 275/2020/01/JAH) shall be implemented as approved in writing by the local planning authority (LPA). The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained

2. *Notwithstanding such detail as shall have been submitted and or approved, no development shall commence until further details of the landscaping scheme and an associated landscaping and management plan for the SuDS features have been submitted to the Local Planning Authority, detailing how the SuDS features will be planted, established for the first 5 (five) years, managed, and maintained in perpetuity.*

Reason: To ensure that the SuDS features are planted, landscaped so that they provide water quality treatment and enhanced biodiversity.

3. Within 28 days of practical completion of the last dwelling or unit, surface water drainage verification report shall be submitted to the Local Planning Authority, detailing and verifying that the surface water drainage system has been inspected and has been built and functions in accordance with the approved designs and drawings. The report shall include details of all SuDS components and piped networks in an agreed form, for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure that the surface water drainage system has been built in accordance with the approved drawings and is fit to be put into operation and to ensure that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as required under s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

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 LPA. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP shall include:

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 or groundwater

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-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 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council
Growth, Highway & Infrastructure
Endeavour House, 8 Russell Rd, Ipswich , Suffolk IP1 2BX

****Note I am remote working for the time being****

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

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 17 November 2021 10:48

To: GHI Floods Planning <floods.planning@suffolk.gov.uk>

Subject: MSDC Planning Re-consultation Request - DC/21/02982

Please find attached planning re-consultation request letter relating to planning application - DC/21/02982 - Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA

Kind Regards

Planning Support Team

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Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to

a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested.
For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 24 Mar 2022 04:42:17

To:

Cc:

Subject: FW: LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA - . DC/21/02982

Attachments:

From: Cattier, Sophie <Sophie.Cattier@HistoricEngland.org.uk>

Sent: 24 March 2022 13:54

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA - . DC/21/02982



EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT

Dear Alex Scott

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND EAST OF ASPALL ROAD, DEBENHAM, SUFFOLK, IP14 6QA
Application No. DC/21/02982**

Thank you for your letter of 4 March 2022 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England provided advice in our letter dated 10th June 2021 where we raised concerns on heritage grounds as the development for 54 new dwellings would further erode the relationship of Debenham Conservation Area and the surrounding countryside. We considered that this development would result in less than substantial harm to Debenham Conservation Area through development within its setting. The amended Heritage Statement has now assessed the impact on the proposal on Debenham Conservation Area and also concluded there would be some harm to its significance, albeit minor.

Whilst we would accept that the construction of the new housing could be considered a public benefit and it is for the council to weigh this against any harm in terms of paragraph 202. We therefore recommend the Council consider this factor when seeking the 'clear and convincing justification' for the harm required by paragraph 200. If this justification is not found we recommend the application is refused.

The additional information does not address our concerns and we therefore refer you to our previous letter.

If you have any questions please do not hesitate to contact us.

Yours sincerely

Sophie Cattier

Sophie Cattier | Assistant Inspector of Historic Buildings and Areas
Direct Line: 01223 582740

Historic England | Brooklands
24 Brooklands Avenue | Cambridge | CB2 8BU
www.historicengland.org.uk

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Growth, Highways and Infrastructure
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Philip Isbell
Chief Planning Officer
Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich IP1 2BX

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

Our Ref: 2021_02982
Date: 27th May 2021

For the Attention of Alex Scott

Dear Mr Isbell

Planning Application DC/21/02982 – Land east of Aspell Road, Debenham: Archaeology

This site lies in an area of archaeological potential recorded on the County Historic Environment Record and is in a topographically favourable for archaeological remains overlooking a tributary of the River Deben. The proposed development area is located immediately north of the record historic settlement core of Debenham (DBN 131), and a scatter of 13th-14th century pottery is recorded from within the site (DBN 052). Further scatters of medieval, late Saxon and prehistoric finds are recorded to the north (DBN 040, 051, 053). Archaeological evaluation of the site (geophysical survey and trial trenching) has defined extensive archaeological remains relating to medieval occupation, as well as a couple of Bronze Age features (DBN 238). As a result, there is high potential for further below ground archaeological remains to survive at this location and the proposed development would cause significant ground disturbance that has potential to damage or destroy known heritage assets.

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 199), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2019).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological excavation will be required before any groundworks commence.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

From: Vanessa Pannell <Vanessa.Pannell@baberghmidsuffolk.gov.uk>

Sent: 19 Oct 2021 09:12:54

To:

Cc:

Subject: MSDC Planning Re-consultation Request - DC/21/02982

Attachments: SCCAS (RA)_2021_02982_Land east of Aspall Lane, Debenham.pdf

-----Original Message----- From: Rachael Abraham Sent: 19 October 2021 08:20 To: BMSDC Planning Mailbox Cc: Alex Scott Subject: RE: MSDC Planning Re-consultation Request - DC/21/02982 Dear Alex, Thank-you for reconsulting us on this application. Our advice remains the same as that provided on 27/5, which I have attached again for convenience. Best wishes, Rachael Rachael Abraham B.A. (Hons), M.A. Senior Archaeological Officer Please note that my working days are Tuesday-Thursday Suffolk County Council Archaeological Service, Bury Resource Centre, Hollow Road, Bury St Edmunds, IP32 7AY

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/F221555
Enquiries to: Water Officer
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 26/05/2021

Dear Sirs,

Land East Of Aspoll Road, Debenham, Suffolk, IP14 6QA
Planning Application No: DC/21/02982/FUL

A CONDITION IS REQUIRED FOR FIRE HYDRANTS
(see our required conditions)

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.

Sprinklers Advised

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

Water Officer

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: Mr Chris Smith Melton Park House Scott Lane Melton Woodbridge IP12 1TJ

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: F221555
Enquiries to: Water Officer
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 26/05/2021

Planning Ref: DC/21/02982/FUL

Dear Sirs,

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land East Of Aspall Road, Debenham, Suffolk, IP14 6QA
DESCRIPTION: 54 DWELLINGS
HYDRANTS REQUIRED

If the Planning Authority is minded to grant approval, the Fire Authority require 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, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.

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

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

Yours faithfully

Water Officer

Suffolk Fire and Rescue Service

OFFICIAL

Created: September 2015

Enquiries to: Fire Business Support Team
Tel: 01473 260588
Email: Fire.BusinessSupport@suffolk.gov.uk



Dear Sir/Madam

Suffolk Fire and Rescue Service – Automatic Fire Sprinklers in your Building Development

We understand from local Council planning you are considering undertaking building work.

The purpose of this letter is to encourage you to consider the benefits of installing automatic fire sprinklers in your house or commercial premises.

In the event of a fire in your premises an automatic fire sprinkler system is proven to save lives, help you to recover from the effects of a fire sooner and help get businesses back on their feet faster.

Many different features can be included within building design to enhance safety and security and promote business continuity. Too often consideration to incorporate such features is too late to for them to be easily incorporated into building work.

Dispelling the Myths of Automatic Fire Sprinklers

Automatic fire sprinklers are relatively inexpensive to install, accounting for approximately 1-3% of the cost of a new build.

Fire sprinkler heads will only operate in the vicinity of a fire, they do not all operate at once.

An automatic fire sprinkler head discharges between 40-60 litres of water per minute and will cause considerably less water damage than would be necessary for Firefighters tackling a fully developed fire.

Statistics show that the likelihood of automatic fire sprinklers activating accidentally is negligible – they operate differently to smoke alarms.

Promoting the Benefits of Automatic Fire Sprinklers

They detect a fire in its incipient stage – this will potentially save lives in your premises.

Sprinklers will control if not extinguish a fire reducing building damage.

Automatic sprinklers protect the environment; reducing water damage and airborne pollution from smoke and toxic fumes.

They potentially allow design freedoms in building plans, such as increased compartment size and travel distances.

They may reduce insurance premiums.

Automatic fire sprinklers enhance Firefighter safety.

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- Domestic sprinkler heads are recessed into ceilings and pipe work concealed so you won't even know they're there.
- They support business continuity – insurers report 80% of businesses experiencing a fire will not recover.
- Properly installed and maintained automatic fire sprinklers can provide the safest of environments for you, your family or your employees.
- A desirable safety feature, they may enhance the value of your property and provide an additional sales feature.

The Next Step

Suffolk Fire and Rescue Service is working to make Suffolk a safer place to live. Part of this ambition is as champion for the increased installation of automatic fire sprinklers in commercial and domestic premises.

Any information you require to assist you to decide can be found on the following web pages:

Suffolk Fire and Rescue Service

<http://www.suffolk.gov.uk/emergency-and-rescue/>

Residential Sprinkler Association

<http://www.firesprinklers.info/>

British Automatic Fire Sprinkler Association

<http://www.bafsa.org.uk/>

Fire Protection Association

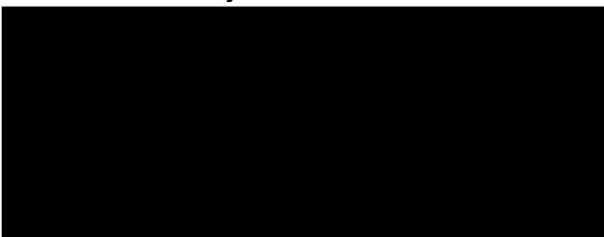
<http://www.thefpa.co.uk/>

Business Sprinkler Alliance

<http://www.business-sprinkler-alliance.org/>

I hope adopting automatic fire sprinklers in your build can help our aim of making 'Suffolk a safer place to live'.

Yours faithfully



Mark Hardingham
Chief Fire Officer
Suffolk Fire and Rescue Service

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We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process.

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From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 18 Oct 2021 04:34:08

To:

Cc:

Subject: FW: MSDC Planning Re-consultation Request - DC/21/02982

Attachments: ufm25_Standard_Re-consultation_Letter.pdf

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

From: Water Hydrants <Water.Hydrants@suffolk.gov.uk>

Sent: 18 October 2021 15:55

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Cc: Andrea Stordy <Andrea.Stordy@suffolk.gov.uk>

Subject: FW: MSDC Planning Re-consultation Request - DC/21/02982

Good afternoon.

I can confirm that our letter, requiring fire hydrants and dated the 24/05/21 has been published on the website under the same planning application number on your letter of the 15/10/21.

Therefore our comment for the attached letter is 'Original comments may remain in place'

Kind regards

Angie Kempen

Water Officer

Suffolk Fire and Rescue Service

Endeavour House

Russell Road

Ipswich

IP1 2BX

Suffolk.

Our Mission Statement: We will make a positive difference for Suffolk. We are committed to working together, striving to improve and securing the best possible services.

Our Values: Wellbeing, Equality, Achieve, Support, Pride, Innovate, Respect, Empower

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

From: Fire Business Support Team <Fire.BusinessSupport@suffolk.gov.uk>

Sent: 15 October 2021 11:26

To: Water Hydrants <Water.Hydrants@suffolk.gov.uk>

Subject: FW: MSDC Planning Re-consultation Request - DC/21/02982

Good morning,

Please see attached consultation FYA.

Kind regards,

Matt Plummer

Business Support Officer

Fire and Public Safety Directorate

Suffolk Fire and Rescue Service

Endeavour House

8 Russell Road

Ipswich

IP1 2BX

01473 260792

Matthew.plummer@suffolk.gov.uk

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

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 15 October 2021 11:07

To: Fire Business Support Team <Fire.BusinessSupport@suffolk.gov.uk>

Subject: MSDC Planning Re-consultation Request - DC/21/02982

Please find attached planning re-consultation request letter relating to planning application - DC/21/02982 - Land East Of, Aspoll Road, Debenham, Suffolk IP14 6QA

Kind Regards

Planning Support Team

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For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

From: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Sent: 24 May 2021 02:56:27

To:

Cc:

Subject: FW: MSDC Planning Consultation Request - DC/21/02982

Attachments:

From: Chris Ward <Chris.Ward@suffolk.gov.uk>

Sent: 24 May 2021 13:52

To: Alex Scott <Alex.Scott@babberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>; Ben Chester <Ben.Chester@suffolk.gov.uk>

Subject: RE: MSDC Planning Consultation Request - DC/21/02982

Dear Alex,

Thank you for consulting me about the proposed residential development at Land East of Aspoll Road in Debenham. On reviewing the planning application documents I have no comment to make, as the size of the development does not meet the threshold of requiring a Travel Plan.

Kind regards

Chris Ward

Active Travel Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 15 Oct 2021 04:37:32

To:

Cc:

Subject: FW: MSDC Planning Re-consultation Request - DC/21/02982

Attachments:

From: Chris Ward <Chris.Ward@suffolk.gov.uk>

Sent: 15 October 2021 16:25

To: Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Re-consultation Request - DC/21/02982

Dear Alex,

Thank you for notifying me about the re-consultation. On reviewing the documents, I have no further comment to add from my previous response on 24th May 2021.

Kind regards

Chris Ward

Active Travel Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

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

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 15 October 2021 11:06

To: Chris Ward

Subject: MSDC Planning Re-consultation Request - DC/21/02982

Please find attached planning re-consultation request letter relating to planning application - DC/21/02982 - Land East Of, Aspoll Road, Debenham, Suffolk IP14 6QA

Kind Regards

Planning Support Team

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Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested.

For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

Your ref: DC/21/02982/FUL
Our ref: Land East Of, Aspoll Road,
Debenham, IP14 6QA. Matter No: 60115
Date: 4 June 2021
Enquiries to: Ruby Shepperson
Tel: 01473 265063
Email: Ruby.Shepperson@suffolk.gov.uk



By e-mail only:

planningblue@baberghmidsuffolk.gov.uk
Alex.Scott@baberghmidsuffolk.gov.uk

Dear Alex,

Debenham: Land East Of, Aspoll Road – developer contributions.

I refer to the proposal: Full Planning Application – Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure, and landscaping.

This letter sets out the infrastructure requirements which arise, most of which will be covered by CIL apart from site-specific mitigation.

Summary table of infrastructure requests:

CIL	Education	Capital Contribution
	- Primary	£207,216
	- Secondary	£213,975
	- Sixth form	£47,550
CIL	Early years	£86,340
CIL	Libraries improvements	£11,664
CIL	Waste	£6,102
S106	Monitoring fee	£412
S106	Highways	Tbc

Paragraph 56 of the National Planning Policy Framework (NPPF) 2018 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 their 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; this is implemented through Policy CS6: Services and Infrastructure.
- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

The emerging Joint Local Plan contains policy proposals that will form an important tool for the day to day determination of planning application in both districts. Infrastructure is one of the key planning issues and the Infrastructure chapter states that the Councils fully appreciate that the delivery of new homes and jobs needs to be supported by necessary infrastructure, and new development must provide for the educational needs of new residents.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule on 21st January 2016 and started charging CIL on planning permissions granted from 11th April 2016.

New CIL Regulations were laid before Parliament on 4 June 2019. These Regulations (Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019) came into force on 1 September 2019 (“the commencement date”). Regulation 11 removes regulation 123 (pooling restriction and the CIL 123 List in respect of ‘relevant infrastructure’).

Site specific mitigation will be covered by a planning obligation and/or planning conditions.

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

- 1. Education.** Paragraph 94 of the NPPF states: ‘It is important 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. They should:
 - a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
 - b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.’

Furthermore, the NPPF at paragraph 104 states: 'Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;

The Department for Education (DfE) publication 'Securing developer contributions for education' (April 2019), which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations [revised September 2019]. Paragraph 19 of the DfE guidance states, "We advise local authorities with education responsibilities to work jointly with relevant local planning authorities as plans are prepared and planning applications determined, to ensure that all education needs are properly addressed, including both temporary and permanent education needs where relevant, such as school transport costs and temporary school provision before a permanent new school opens within a development site".

In paragraph 15 of the DfE guidance 'Securing developer contributions for education' it says, "We advise that you base the assumed cost of mainstream school places on national average costs published annually in the DfE school place scorecards. This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the national average to reflect the costs in your region, using BCIS location factors". The DfE scorecard costs have been adjusted for inflation using the latest Building Cost Information Service (BCIS) All-In Tender Price of Index (TPI), published March 2020. The technical notes state to adjust the national average to the region of interest, divide the national average cost by the weight for the region, given in the Scorecard underlying data (the regional weight has been calculated using the regional location factors).

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for primary schools is £17,268 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£17,268 / 1.00) produces a total of £17,268 per pupil for permanent expansion of primary schools.

The most recent scorecard is 2019 and the national average school expansion build cost per pupil for secondary schools is £23,775 (March 2020). The regional weighting for the East of England based on BCIS indices, which includes Suffolk, is 1. When applied to the national expansion build cost (£23,775 / 1) produces a total of £23,775 per pupil for permanent expansion of secondary schools. The DfE guidance in paragraph 16 says, "further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place".

School level	Minimum pupil yield:	Required:	Cost per place £ (2020/21):
Primary school age range, 5-11:	12	12	£17,268
High school age range, 11-16:	9	9	£23,775
Sixth school age range, 16+:	2	2	£23,775

Total education CIL contributions:	£468,741.00
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The local schools are Sir Robert Hitcham's CEVAP School (catchment and nearest), Debenham High School (catchment and nearest school), and Hartismere School ((ages 11 – 18) local school and second nearest). Based on the existing forecasts and potential developments in the area and local plans coming forward, SCC will have no surplus places available at the catchment primary and secondary schools.

At the primary school level, the strategy is to expand existing primary school provision to meet the demands arising from basic need and housing growth. The DfE publication talks about the importance of safeguarding land for schools by working with LPAs and developers to ensure that long-term pupil place planning objectives are secured. Contributions will be sought to futureproof for potential pupil place deficit.

At the secondary school and sixth form levels, the strategy is to expand existing provision to meet the demands arising from basic need and housing growth.

Based on existing school forecasts, potential developments in the area and local plan sites, SCC will have no surplus places available at the local primary, secondary and sixth form schools. On this basis, at the primary school level a future **CIL** funding bid of at least (12 pupils x £17,268) = **£207,216** (2020/21 costs) will be made, at the secondary school level a future **CIL** funding bid of at least (9 pupils x £23,775) = **£213,975** (2020/21 costs) will be made, and at sixth form level a future **CIL** funding bid of a lease (2 pupils x £23,775) = **£47,550** will be made for expansion of local sixth form provision.

- 2. Pre-school provision.** Provision for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'

The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the

childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

This matter is in the Debenham ward where there is an existing deficit of FTEs. It is anticipated that this proposal will generate nine children. On this basis, an Early Years **CIL** contribution of (5 FTEs x £17,268) = **£86,340** (2021 costs) will be sought to go towards the enhancement and improvement to local provision.

3. **Play space provision.** This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A further key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.
4. **Transport issues.** Refer to the NPPF Section 9 'Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Ben Chester will coordinate a response, which will outline the strategy in more detail.

Suffolk County Council, in its role as a local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014 (updated 2019).

5. **Libraries.** Refer to the NPPF Section 8: 'Promoting healthy and safe communities'.

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A **CIL** contribution of £216 per dwelling is sought (i.e. £11,664) which will be spent on enhancing and improving provision serving the development. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost

Information Service data but excluding land costs). This gives a cost of (3 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

Libraries CIL contribution:	£11,664.00
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- 6. 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. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

SCC has a project underway to identify a new HWRC site for the Stowmarket catchment area. The likely cost of a new HWRC is between £3m and £5m. This is a priority site in the Waste Infrastructure Strategy and some budget has been identified for this purpose, however, the Waste Service would expect contributions of £113 per household from any significant development in this area.

Waste CIL Contribution:	£6,102.00
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- 7. Supported Housing.** Section 5 of the NPPF seeks to deliver a wide choice of high-quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category

M4(3)' standard. In addition, we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the LPAs housing team to identify local housing needs.

8. Sustainable Drainage Systems. A consultation response will be coordinated by Suffolk County Council FAO Jason Skilton.

9. Fire Service. Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for firefighting which will allow SCC to make final consultations at the planning stage.

11. Superfast broadband. This should be considered as part of the requirements of the NPPF Section 10 'Supporting high quality communication'. 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 premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

12. Legal costs. SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.

13. Monitoring Fee. The new CIL Regs allow for charging of monitoring fees. In this respect the county council charges **£412** for each trigger point in a planning obligation, payable upon commencement.

14. Time Limits. The above information is time-limited for 6 months only from the date of this letter.

Yours sincerely,

Ruby Shepperson
Planning Officer
Growth, Highways, & Infrastructure Directorate

cc Ben Chester, Suffolk County Council
Carol Barber, Suffolk County Council
Floods Planning, Suffolk County Council

Your ref: DC/21/02982/FUL
Our ref: Debenham: Land East of Aspoll Road
Matter: 60015
Date: 5 November 2021
Enquiries to: Isabel Elder
Tel: 01473 265040
Email: isabel.elder@suffolk.gov.uk



By e-mail only:

Planningblue@babermidsuffolk.gov.uk
alex.scott@babermidsuffolk.gov.uk

Dear Alex

Debenham: Land East of Aspoll Road DC/21/02982/FUL

I refer to the proposal: Full Planning Application for the erection of 54 dwellings (including 19 affordable) creation of vehicular and pedestrian access, public open space, infrastructure and landscaping and your reconsultation letter dates 15 October 2021.

Amended plans have been received in response to highways comments who will respond to you directly. I have no further comment to make regarding other SCC developer contributions

Yours Sincerely

Isabel Elder
Developer Contributions Consultant
Growth, Highways, & Infrastructure Directorate

Cc Ben Chester, Suffolk Highways



FAO: Planning Department,
Babergh / Mid Suffolk District Council

Ref: DC/21/02982
Date: 01/04/2022

HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

RE: Land East Of Aspall Road, Debenham, Suffolk, IP14 6QA.

Built Heritage Advice pertaining to an application for: Full Planning Application - Erection of 54 No. dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

The proposed development site is adjacent to the north boundary of the Debenham Conservation Area, and in close proximity of several listed buildings including the Grade II listed 50, Aspall Road (1352455), the Grade II listed Debenham House (List Entry Number: 1032309), the Grade II listed Barn 30 Metres West of Gull Farmhouse (List Entry Number: 1352456), and the Grade II listed Gull Farmhouse (List Entry Number: 1032310), all of which have the potential to be impacted through change within their setting.

The proposed development site is an arable field with views of the wider agrarian landscape to the north, east, and west.

Historic maps show that Debenham House and the proposed development site have a historical functional relationship. The view of Debenham House, adjacent to the proposed development site, from the rural approach to the west facilitates the legibility and understanding of the historic use of the heritage asset. Therefore, the proposed development site, having associative value with Debenham House, contributes to the setting and special historic interest of the heritage asset.

The Debenham Conservation Area and historic core of Debenham village is characterised by its linear settlement running north to south, with a variety of medieval and post-medieval buildings presented along High Street, and a visual and experienced relationship with the countryside to the north-east and north-west. As such, the proposed development site contributes to the significance of the Debenham Conservation as an open arable field which preserves the historic linear plan of the village.

The proposal to erect 54 dwellings will have a detrimental visual impact on the view of Debenham House and the proposed development site from the west, obscuring the legibility of the historic functional relationship of the heritage asset and the site and consequently the historic use of the



heritage asset. For that reason, the proposals would constitute a scheme that would lead to less than substantial harm to the Grade II listed Debenham House, making Paragraph 202 of the National Planning Policy Framework (NPPF) relevant.

Furthermore, the proposals would sever the north-east link between Debenham Conservation Area and the open agrarian landscape beyond and obscure the historic relationship between the settlement and the surrounding countryside. Additionally, the proposals would significantly alter the historic linear development. The proposals, therefore, would amount to less than substantial harm to the significance of the Debenham Conservation Area, and fail to preserve its character and appearance contrary to Paragraph 206 of the NPPF.

It is not possible to support the proposals as they are in conflict with Paragraphs 202 and 206 of the NPPF and Sections 66, and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Yours sincerely,

Samantha Pace IHBC
Historic Environment Team
Place Services

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

From: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Sent: 21 Jun 2021 12:22:03

To:

Cc:

Subject: FW: DC/21/02982 - Heritage response

Attachments:

From: Tegan Chenery <Tegan.Chenery@babberghmidsuffolk.gov.uk>

Sent: 18 June 2021 14:50

To: Alex Scott <Alex.Scott@babberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Subject: DC/21/02982 - Heritage response

Hello Alex,

DC/21/02982 – Land east of Aspoll Road, Debenham

This application is for the erection of 54 dwellings, as well as the creation of vehicular and pedestrian access, public open space, infrastructure and landscaping. The issues of the Heritage Team's concern relate to the potential impact of the proposals on the setting and subsequently the significance of nearby listed buildings, as well as the character and appearance of the conservation area.

To the north west of the proposal site is the Grade II listed Gull Farmhouse and barn which stand in a rural position to the west of Aspoll Road. To the south west of the site and in close proximity are the Grade II listed Debenham House (No. 52 Aspoll Road) and No. 50 Aspoll Road which represent the northern limit of the town's historic core and are therefore also included within Debenham Conservation Area which extends south. I also note that the allocated site is within Debenham's Neighbourhood Plan.

Pre-application advice was sought with the Heritage Team and the proposals are broadly representative of those discussions. There have been some alterations to the layout of the site but the set back nature of the scheme from Aspoll Road is sustained. This would serve to retain some of the rural character of the approach to the village, despite the rising topography of the plot which might increase the visual impact of the development. Nevertheless, the visual appreciation of the listed buildings would largely be preserved.

However, I acknowledge the comments made by both HE and SPS.

The development would inevitably cause an impact on this part of the currently undeveloped rural landscape. It was outlined during the pre-application submission that its impact could be lessened by perhaps reducing the scale of the buildings perceived from the north and adjacent to the listed buildings so as to provide a 'soft edge' which could limit the impact on the setting of the listed buildings. Furthermore, the boundary treatment drawings and key are unclear. Post and rail and soft boundaries should be employed to the exterior boundaries of the site and in public views to reinforce the rural, edge of settlement location in the setting of the conservation area and designated assets, with close boarded fencing limited to private spaces between plots.

In addition, the materials palette is a little over varied and could appear frenetic alongside the numerous designs and forms of the dwellings. A reduced materials palette which better references the historic core of Debenham and responds to the forms within it, could help to provide a more coherent and simplified scheme.

As such, I consider the application would cause a *low level of less than substantial harm* to the significance of the listed buildings, as well as the character and appearance of the conservation area. Therefore, it does not accord with National or Local Planning Policies. However, in line with para. 196 of the NPPF, the harm should be weighed against the public benefits of the proposal.

Should the LPA be subsequently minded to grant permission, the following conditions should be imposed:

- Notwithstanding the submitted information, manufacturer's literature of facing and roofing materials, including finish colours
- Notwithstanding the submitted information, details of all boundary treatments
- Notwithstanding the submitted information, manufacturer's literature of external hard surfacing
- Notwithstanding the submitted information, section drawings through the site to demonstrate the finished ground, floor, eaves and ridges heights of the proposed development and the adjacent existing development
- PD rights removed – boundaries

Tegan Chenery BA(Hons) MSt

Heritage and Design Officer

Babergh and Mid Suffolk District Councils - Working Together

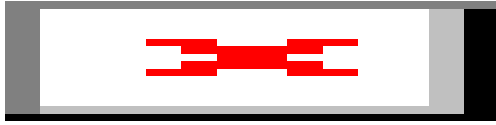
tel: 01449 724677 | 07860 827107

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For our latest Coronavirus response please visit our website via the following link:
<https://www.midsuffolk.gov.uk/features/our-covid-19-response/>





FAO: Planning Department,
Babergh / Mid Suffolk District Council

Ref: DC/21/02982
Date: 01/04/2022

HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

RE: Land East Of Aspall Road, Debenham, Suffolk, IP14 6QA.

Built Heritage Advice pertaining to an application for: Full Planning Application - Erection of 54 No. dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

The proposed development site is adjacent to the north boundary of the Debenham Conservation Area, and in close proximity of several listed buildings including the Grade II listed 50, Aspall Road (1352455), the Grade II listed Debenham House (List Entry Number: 1032309), the Grade II listed Barn 30 Metres West of Gull Farmhouse (List Entry Number: 1352456), and the Grade II listed Gull Farmhouse (List Entry Number: 1032310), all of which have the potential to be impacted through change within their setting.

The proposed development site is an arable field with views of the wider agrarian landscape to the north, east, and west.

Historic maps show that Debenham House and the proposed development site have a historical functional relationship. The view of Debenham House, adjacent to the proposed development site, from the rural approach to the west facilitates the legibility and understanding of the historic use of the heritage asset. Therefore, the proposed development site, having associative value with Debenham House, contributes to the setting and special historic interest of the heritage asset.

The Debenham Conservation Area and historic core of Debenham village is characterised by its linear settlement running north to south, with a variety of medieval and post-medieval buildings presented along High Street, and a visual and experienced relationship with the countryside to the north-east and north-west. As such, the proposed development site contributes to the significance of the Debenham Conservation as an open arable field which preserves the historic linear plan of the village.

The proposal to erect 54 dwellings will have a detrimental visual impact on the view of Debenham House and the proposed development site from the west, obscuring the legibility of the historic functional relationship of the heritage asset and the site and consequently the historic use of the



heritage asset. For that reason, the proposals would constitute a scheme that would lead to less than substantial harm to the Grade II listed Debenham House, making Paragraph 202 of the National Planning Policy Framework (NPPF) relevant.

Furthermore, the proposals would sever the north-east link between Debenham Conservation Area and the open agrarian landscape beyond and obscure the historic relationship between the settlement and the surrounding countryside. Additionally, the proposals would significantly alter the historic linear development. The proposals, therefore, would amount to less than substantial harm to the significance of the Debenham Conservation Area, and fail to preserve its character and appearance contrary to Paragraph 206 of the NPPF.

It is not possible to support the proposals as they are in conflict with Paragraphs 202 and 206 of the NPPF and Sections 66, and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Yours sincerely,

Samantha Pace IHBC
Historic Environment Team
Place Services

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



9 June 2021

Alex Scott
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this application from Place Services' 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.

Application: DC/21/02982
Location: Land East Of Aspall Road Debenham Suffolk IP14 6QA
Proposal: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping

Dear Alex,

Thank you for consulting Place Services on the above application.

Holding objection due to insufficient ecological information on Priority species (farmland birds)

Summary

We have reviewed the Ecological Appraisal (Carter Sustainability Ltd, May 2021), supplied by the applicant, relating to the likely impacts of development on designated sites, Protected and Priority Species & Habitats

We are not satisfied that there is sufficient ecological information available for determination.

There is insufficient information available to identify the likely impacts upon Priority Farmland birds, particularly Skylark *Alauda arvensis* which nest in arable fields. Although mitigation during construction has been recommended in the Ecological Appraisal, mitigation for the loss of nesting habitat for ground-nesting birds has not been considered.

As a result, we recommend that further information should be provided to identify the likelihood of breeding Skylarks present within the site, which could be informed by a Breeding Bird Survey in line with BTO Common Bird Census methodology. If adverse impacts are likely to be caused to this Priority Species as a result of the proposed development, then a bespoke Farmland Bird Mitigation Strategy



may be required to ensure that impacts upon nesting Skylark are mitigated and compensated for this application. This may require compensation measures (e.g. [Skylark plots](#)) to be provided on-site or off-site in nearby agricultural land. This should be secured as a condition of any consent if suitable land can be delivered in the applicant's control. However, if suitable land is not available in the applicant's control, then the compensation measures may be required to be secured via a legal agreement, which could be brokered by [Whirledge & Nott](#).

In addition, we note that Great Crested Newt Surveys have indicated that low Populations of Great Crested Newts are located on the site boundaries. However, the applicant's ecologist has been proposed that a non-licenced approach could be undertaken for this application. This is because the application site consists of agricultural land, which is not suitable terrestrial habitat for the species and won't fragment the existing population. As a result, it is indicated that we agree that a non-licenced approach can be implemented for this application and that we support the proposed mitigation and compensation measures, which are line with Natural England Licencing Policy 1.

Furthermore, we support the reasonable biodiversity enhancements, which have been outlined within the Ecological Assessment (Ecological Appraisal (Carter Sustainability Ltd, May 2021). This will ensure measurable net gain for biodiversity, which will meet the requirements of Paragraph 170d of the National Planning Policy Framework 2019.

Therefore, the further farmland bird information is required to provide the LPA with certainty of impacts on Priority species and be able to secure appropriate mitigation either by legal agreement or a condition of any consent. This will enable the LPA to demonstrate compliance with its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson ACIEEM BSc (Hons)

Ecological Consultant

placeservicesecology@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

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



01 October 2021

Alex Scott
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this application from Place Services' 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.

Application: DC/21/02982
Location: Land East Of Aspall Road Debenham Suffolk IP14 6QA
Proposal: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping

Dear Alex,

Thank you for re-consulting Place Services on the above application.

No objection subject to securing ecological mitigation and enhancement measures

Summary

We have reviewed the Ecological Appraisal (Carter Sustainability Ltd, May 2021) and the Addendum Ecological Report; Breeding Bird Assessment (Carter Sustainability Ltd, July 2021), supplied by the applicant, relating to the likely impacts of development on designated sites, Protected and Priority Species & Habitats

We are now satisfied that there is sufficient ecological information available for determination. This is because the Breeding Bird Assessment has confirmed no impacts to Priority farmland birds, including ground nesting bird species.

This provides certainty for the LPA of the likely impacts on designated sites, Protected and Priority Species & Habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

Therefore, the mitigation measures identified in the Ecological Appraisal (Carter Sustainability Ltd, May 2021) and the Addendum Ecological Report; Breeding Bird Assessment (Carter Sustainability Ltd, July 2021) should be secured and implemented in full. This is necessary to conserve Protected and



Priority Species. Therefore, it is recommended that a Construction Environmental Management Plan (CEMP: Biodiversity) should be secured as a pre-commencement condition of any consent, which should contain the finalised non-licenced measures for Great Crested Newt.

We also recommend that a Wildlife Friendly Lighting Strategy is implemented for this application. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely present within the local area. This should summarise the following measures will be implemented:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm White lights should be used at <3000k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- The provision of motion sensors or timers to avoid the amount of 'lit-time' of the proposed lighting.
- Lights should be designed to prevent horizontal spill e.g. cowls, hoods, reflector skirts or shields.

In addition, we support the proposed reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 174d of the National Planning Policy Framework 2021. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy. The strategy should be secured prior to commencement as a condition of any consent.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

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

Recommended conditions

1. PRIOR TO COMMENCEMENT: CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN FOR BIODIVERSITY

"A construction environmental management plan (CEMP: Biodiversity) shall be submitted to and approved in writing by the local planning authority, in line with the Ecological Appraisal (Carter Sustainability Ltd, May 2021) and the Addendum Ecological Report; Breeding Bird Assessment (Carter Sustainability Ltd, July 2021).

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 conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species).

2. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

“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 organisation 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 Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 (as amended) and s40 of the NERC Act 2006 (Priority habitats & species)



3. PRIOR TO OCCUPATION: BIODIVERSITY ENHANCEMENT STRATEGY

"A Biodiversity Enhancement Strategy for Protected and Priority species shall be submitted to and approved in writing by the local planning authority.

The content of the Biodiversity Enhancement Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed enhancement measures;*
- b) detailed designs to achieve stated objectives;*
- c) locations of proposed enhancement measures by appropriate maps and plans;*
- d) persons responsible for implementing the enhancement measures;*
- e) details of initial aftercare and long-term maintenance (where relevant).*

The works shall be implemented in accordance with the approved details and shall be retained in that manner thereafter."

Reason: To conserve and enhance protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

4. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE 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 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 conserve protected and Priority species and allow the LPA to discharge its duties under the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

Please contact us with any queries.

Yours sincerely,

Hamish Jackson ACIEEM BSc (Hons)
Ecological Consultant
placeservicesecology@essex.gov.uk



Place Services provide ecological advice on behalf of Mid Suffolk District Council

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: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 08 Jun 2021 10:42:32

To:

Cc:

Subject: FW: IDOX-Public: DC/21/02982 - Land Contamination

Attachments:

From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>

Sent: 08 June 2021 09:09

To: Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

Subject: DC/21/02982. Land Contamination

EP Reference : 293425

DC/21/02982. Land Contamination

Land East Of, Aspall Road, Debenham, STOWMARKET, Suffolk, IP14 6QA.

Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

Many thanks for your request for comments in relation to the above application. Having reviewed the application and supporting Phase I report by Harrison Geotechnical Engineering (ref. GN24041_SI dated February 2021) I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contamination-and-the-planning-system/>.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

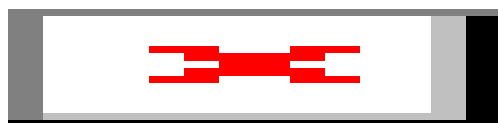
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk

Work: 01449 724715

websites: www.babergh.gov.uk www.midsuffolk.gov.uk



Minimum requirements for dealing with unexpected ground conditions being encountered during construction.

1. All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.
2. A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.
3. The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.
4. The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.
5. The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.
6. Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.
7. Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.
8. Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.
9. Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.
10. A photographic record will be made of relevant observations.
11. The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be:
 - re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or
 - treatment of material on site to meet compliance targets so it can be re-used; or
 - removal from site to a suitably licensed landfill or permitted treatment facility.
12. A Verification Report will be produced for the work.

From: Nathan Pittam
Sent: 02 November 2021 07:21
Subject: (299470) DC/21/02982. Land Contamination

EP Reference : 299470
DC/21/02982. Land Contamination
Land East Of, Aspoll Road, Debenham, STOWMARKET, Suffolk, IP14 6QA.
Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

Many thanks for your request for comments in relation to the above application. I can confirm that I have no cause to amend my comments of 8th June 2021 (see below).

Regards

Nathan

From: Nathan Pittam
Sent: 08 June 2021 09:09
To: Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: DC/21/02982. Land Contamination

EP Reference : 293425
DC/21/02982. Land Contamination
Land East Of, Aspoll Road, Debenham, STOWMARKET, Suffolk, IP14 6QA.
Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

Many thanks for your request for comments in relation to the above application. Having reviewed the application and supporting Phase I report by Harrison Geotechnical Engineering (ref. GN24041_SI dated February 2021) I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contamination-and-the-planning-system/>.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@babermidsuffolk.gov.uk

Work: 01449 724715

websites: www.babergh.gov.uk www.midsuffolk.gov.uk

Thank you for contacting us

We are working hard to keep services running safely to support and protect our residents, businesses, communities and staff through this period and beyond.

We will respond to your query as soon as possible. In the meantime, you can find the latest council information, including our response to Covid-19, on our website.



Minimum requirements for dealing with unexpected ground conditions being encountered during construction.

1. *All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*
2. *A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*
3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*
9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*

11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be: • re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment; or • treatment of material on site to meet compliance targets so it can be re-used; or • removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>
Sent: 08 Jun 2021 10:42:09
To:
Cc:
Subject: FW: IDOX-Public: DC/21/02982 - Air Quality
Attachments:

From: Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>
Sent: 08 June 2021 09:01
To: Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>
Subject: DC/21/02982. Air Quality

EP Reference : 293428

DC/21/02982. Air Quality

Land East Of, Aspoll Road, Debenham, STOWMARKET, Suffolk, IP14 6QA.

Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

Many thanks for your request for comments in relation to the above application. I can confirm that the scale of development, at 54 dwellings, is not likely to be of a scale of that would compromise the existing good air quality at, and around the development site. When assessing the impacts of developments we give regard to the existing air quality at the site as provided by DEFRA background concentrations and also the number of likely vehicle movements. DEFRA and the Institute of Air Quality Management provide benchmarks of the scale of development that *may* start to cause a deterioration of air quality that requires further assessment. IAQM indicate that concerns may start to occur on developments which generate 500 vehicle movements a day – this development falls short of this threshold and as such further investigation is not warranted.

For details regarding how Babergh and Mid Suffolk District Councils approaches Air Quality including current reports and data, please view our website at <https://www.babergh.gov.uk/environment/air-quality/>. It should be noted that any documentation submitted in relation to a planning application should be sent directly to the Development Management Team and not the Environmental Protection Team as this may lead to delays in the planning process

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk

Work: 01449 724715

websites: www.babergh.gov.uk www.midsuffolk.gov.uk

From: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

Sent: 21 Oct 2021 09:55:56

To:

Cc:

Subject: FW: (299469) DC/21/02982. Air Quality

Attachments:

From: Nathan Pittam <Nathan.Pittam@babberghmidsuffolk.gov.uk>

Sent: 21 October 2021 09:28

To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

Cc: Alex Scott <Alex.Scott@babberghmidsuffolk.gov.uk>

Subject: (299469) DC/21/02982. Air Quality

EP Reference: 299469

DC/21/02982. Air Quality

Land East Of, Aspall Road, Debenham, STOWMARKET, Suffolk, IP14 6QA.

Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

Many thanks for your request for comments in relation to the above application. I can confirm that nothing submitted would cause me to amend my recommendations of 21st July 2021.

Kind regards

Nathan

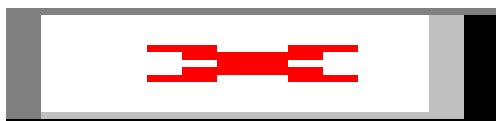
Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@babberghmidsuffolk.gov.uk

Work: 01449 724715

websites: www.babergh.gov.uk www.midsuffolk.gov.uk



From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 04 Jun 2021 12:03:23

To:

Cc:

Subject: FW: Plan ref DC/21/02982 Land East Of, Aspall Road, Debenham. Environmental Health - Noise/Odour/Light/Smoke

Attachments:

From: David Harrold <David.Harrold@baberghmidsuffolk.gov.uk>

Sent: 04 June 2021 10:51

To: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

Cc: Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>

Subject: Plan ref DC/21/02982 Land East Of, Aspall Road, Debenham. Environmental Health - Noise/Odour/Light/Smoke

Thank you for consulting me on the above application for the erection of 54 dwellings.

I can confirm with respect to noise and other environmental health issues that I do not have any adverse comments and no objection to the proposed development. I would, however, recommend the following conditions to mitigate for noise etc. during the construction phase of the development:

Construction Hours

Operations related to the construction (including site clearance and demolition) phases) of the permitted development/use shall only operate between the hours of 08.00 and 18.00hrs Mondays to Fridays and between the hours of 09.00 and 13.00hrs on Saturday. There shall be no working and/or use operated on Sundays and Bank Holidays. There shall be no deliveries to the development/use arranged for outside of these approved hours.

Reason: to minimise detriment to nearby residential amenity

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 include hours for delivery)

Details of the scheduled timing/phasing of the development for the overall construction period

Means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors)

protection measures for footpaths surrounding the site

Loading and unloading of plant and materials

Wheel washing facilities

Lighting

Location and nature of compounds, portaloos and storage areas (including maximum storage heights) and factors to prevent wind-whipping of loose materials

Waste storage and removal

Temporary buildings and boundary treatments

Dust management measures

Method of any demotion to take place, including the recycling and disposal of materials arising from demolition.

Noise and vibration management (to include arrangements for monitoring, and specific method statements for piling) and;

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

Note: the Construction Management Plan shall cover both demotion and construction phases of the above development. The applicant should have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites in the CMP.

Reason: to minimise detriment to nearby residential amenity

David Harrold MCIEH

Senior Environmental Health Officer

Babergh & Midsuffolk District Councils
t: 01449 724718
e: david.harrold@baberghmidsuffolk.gov.uk

From: Vanessa Pannell <Vanessa.Pannell@babberghmidsuffolk.gov.uk>

Sent: 29 Oct 2021 12:06:36

To:

Cc:

Subject: FW: PLANNING APPLICATION: DC/21/02982 : LAND EAST OF ASPALL ROAD.

Attachments:

From: Susan Lennard <Susan.Lennard@babberghmidsuffolk.gov.uk>

Sent: 29 October 2021 10:57

To: Alex Scott <Alex.Scott@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Blue <planningblue@babberghmidsuffolk.gov.uk>

Subject: PLANNING APPLICATION: DC/21/02982 : LAND EAST OF ASPALL ROAD.

PLANNING APPLICATION: DC/21/02982

OUR REFERENCE: 299471

LOCATION: Land East Of Aspall Road Debenham Suffolk IP14 6QA

**APPLICATION: | Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping. |
Reconsultation with additional plans and details.**

I write with regard to the above application for planning approval. Having reviewed the additional information, I would wish to reiterate the recommendations made by Mr Harold in his e mail of the 4th June 2021, namely

CONDITION

CONSTRUCTION HOURS

Operations related to the construction (including site clearance and demolition) phases) of the permitted development/use shall only operate between the hours of 08.00 and 18.00hrs Mondays to Fridays and between the hours of 09.00 and 13.00hrs on Saturday. There shall be no working and/or use operated on Sundays and Bank Holidays. There shall be no deliveries to the development/use arranged for outside of these approved hours.

Reason: to minimise detriment to nearby residential amenity

CONDITION

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 include hours for delivery)

Details of the scheduled timing/phasing of the development for the overall construction period

Means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors) protection measures for footpaths surrounding the site

Loading and unloading of plant and materials

Wheel washing facilities

Lighting

Location and nature of compounds, portaloos and storage areas (including maximum storage heights) and factors to prevent windwhipping of loose materials

Waste storage and removal

Temporary buildings and boundary treatments

Dust management measures

Method of any demotion to take place, including the recycling and disposal of materials arising from demolition.

Noise and vibration management (to include arrangements for monitoring, and specific method statements for piling) and; Litter and waste management during the construction phases of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

Note: the Construction Management Plan shall cover both demotion and construction phases of the above development. The applicant should have regard to BS 5228:2009 Code of Practice of Noise and Vibration Control on Construction and Open Sites in the CMP.

Reason: to minimise detriment to nearby residential amenity

With Kind regards

Sue Lennard

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 27 May 2021 08:33:13

To:

Cc:

Subject: FW: DC/21/02982 Land East Of, Aspall Road, Debenham

Attachments:

From: David Pizzey <David.Pizzey@baberghmidsuffolk.gov.uk>

Sent: 26 May 2021 14:55

To: Alex Scott <Alex.Scott@baberghmidsuffolk.gov.uk>

Cc: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: DC/21/02982 Land East Of, Aspall Road, Debenham

Alex

I have no objection to this application subject to it being undertaken in accordance with the measures outlined in the accompanying arboricultural report. Although a small number of trees are proposed for removal they are of limited amenity value and/or poor condition and are not of sufficient arboricultural or landscape importance to warrant being a constraint. If you are minded to recommend approval we will also require a detailed Arboricultural Method Statement and Tree Protection Plan in order to help ensure harm is not caused to the trees scheduled for retention, this can be dealt with under condition.

Please let me know if you require any further input.

Regards

David Pizzey FArborA

Arboricultural Officer



Tel: 01449 724555

david.pizzey@baberghmidsuffolk.gov.uk

www.babergh.gov.uk and www.midsuffolk.gov.uk

Babergh and Mid Suffolk District Councils – Working Together

Consultation Response Pro forma

1	Application Number	DC/21/02982	
2	Date of Response	01/06/2021	
3	Responding Officer	Name:	James Fadeyi
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
4	Recommendation (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 conditions	
5	Discussion 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.	<p>Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around attached are the vehicle specifications.</p> <div style="text-align: center;">  ELITE 6 - 8x4MS (Mid Steer) Wide Track Dat </div> <p>See the latest waste guidance on new developments.</p> <div style="text-align: center;">  SWP Waste Guidance v.21.docx </div> <p>The road surface and construction must be suitable for an RCV to drive on.</p> <p>To provide scale drawing of site to ensure that access around the development is suitable for refuse collection vehicles.</p> <p>Please provide plans with each of the properties bin presentations plotted, these should be at edge of the curtilage or at the end of private drive and there are suitable collection presentation points. These are required for approval.</p>	

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.

6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate	
7	Recommended conditions	Meet the conditions 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.

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 05 Nov 2021 08:49:41

To:

Cc:

Subject: FW: Planning application - DC/21/02982

Attachments:

From: James Fadeyi <James.Fadeyi@baberghmidsuffolk.gov.uk>

Sent: 04 November 2021 14:14

To: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

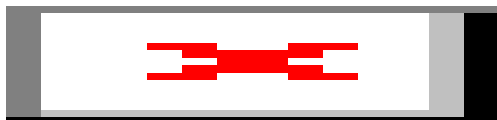
Subject: RE: Planning application - DC/21/02982

Good afternoon,

Thank you for your email re-consultation on the reserved matters application DC/21/02982. Waste services do not wish to add any further comments to our original.

Kind regards,

James Fadeyi
Waste Management Officer - Waste Services
Mid Suffolk and Babergh District Councils - Working Together
Tel: 01449 724832
Mob: 07523 942734
e: James.Fadeyi@baberghmidsuffolk.gov.uk
w: www.babergh.gov.uk | www.midsuffolk.gov.uk
<https://www.suffolkrecycling.org.uk/>



@suffolkrecycle on [Facebook](#), [Twitter](#), [Instagram](#)

@FoodSavvySfk on [Facebook](#) and [Twitter](#)

Subscribe to news and updates [here](#)

Consultation Response Pro forma

Mid Suffolk

1	Application Number	DC-21-02982 – Land East Of, Aspall Road, Debenham.																																																														
2	Date of Response	16.03.2022																																																														
3	Responding Officer	Name:	SACHA TILLER																																																													
		Job Title:	HOUSING ENABLING																																																													
		Responding on behalf of...	HOUSING STRATEGY																																																													
4	Recommendation (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.	<p>No further comments on this application for the following reasons.</p> <p>We would expect to agree all matters for this site at reserved matters stage and in the S106.</p>																																																														
5	Discussion 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.	<p>Planning application purports to erection of 54 dwellings.</p> <p>The applicant has confirmed on 3rd March 2022 that they will provide:</p> <p style="text-align: right;">TOTAL 35 PLOTS</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="5">● Affordable Rent</td> </tr> <tr> <td style="width: 15%;"></td> <td style="width: 40%;">House type Description</td> <td style="width: 15%;">Sq.Ft / Sq M</td> <td style="width: 10%;">No.</td> <td style="width: 20%;">Plot Numbers</td> </tr> <tr> <td>539</td> <td>1 Bed apartment (2 storey)</td> <td>539 / 50.1</td> <td>6</td> <td>38,39,40,41,42,43,</td> </tr> <tr> <td>859</td> <td>2 Bed house (2 storey)</td> <td>859 / 79.8</td> <td>5</td> <td>13,14,15,18</td> </tr> <tr> <td>878</td> <td>2 Bed house (2 storey)</td> <td>878 / 81.6</td> <td>1</td> <td>44,</td> </tr> <tr> <td>904</td> <td>2 Bed house (2 storey)</td> <td>904 / 83.9</td> <td>1</td> <td>17</td> </tr> <tr> <td>1009</td> <td>3 Bed house (2 storey)</td> <td>1009 / 93.7</td> <td>2</td> <td>45,46</td> </tr> </table> <table style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="5">● Shared Ownership</td> </tr> <tr> <td style="width: 15%;"></td> <td style="width: 40%;">House type Description</td> <td style="width: 15%;">Sq.Ft / Sq M</td> <td style="width: 10%;">No.</td> <td style="width: 20%;">Plot Numbers</td> </tr> <tr> <td>878</td> <td>2 Bed house (2 storey)</td> <td>878 / 81.6</td> <td>2</td> <td>9,10</td> </tr> <tr> <td>904</td> <td>2 Bed house (2 storey)</td> <td>904 / 83.9</td> <td>1</td> <td>16</td> </tr> <tr> <td>1009</td> <td>3 Bed house (2 storey)</td> <td>1009 / 93.7</td> <td>2</td> <td>11,12</td> </tr> </table> <p style="text-align: right;">TOTAL 19 PLOTS</p>			● Affordable Rent						House type Description	Sq.Ft / Sq M	No.	Plot Numbers	539	1 Bed apartment (2 storey)	539 / 50.1	6	38,39,40,41,42,43,	859	2 Bed house (2 storey)	859 / 79.8	5	13,14,15,18	878	2 Bed house (2 storey)	878 / 81.6	1	44,	904	2 Bed house (2 storey)	904 / 83.9	1	17	1009	3 Bed house (2 storey)	1009 / 93.7	2	45,46	● Shared Ownership						House type Description	Sq.Ft / Sq M	No.	Plot Numbers	878	2 Bed house (2 storey)	878 / 81.6	2	9,10	904	2 Bed house (2 storey)	904 / 83.9	1	16	1009	3 Bed house (2 storey)	1009 / 93.7	2	11,12
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	<p>Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	Recommended conditions	Should this change then planning permission should be re-sought.

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.

MID SUFFOLK DISTRICT COUNCIL
MEMORANDUM

To: Alex Scott – Planning Officer
From: Sacha Tiller – Strategic Housing
Date: 7th June 2021
Proposal: Full Planning Application – Erection of 54 dwellings (including 19 affordable homes) creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.
Location: Land East Of, Aspall Road, Debenham, Suffolk, IP14 6QA

Key Points

1. Background information

This is a full planning application for 54 dwellings in total, 35% affordable housing contribution is required which equates to 18.90 affordable dwellings in accordance with local policy requirements.

We would expect to see 18 affordable homes delivered on site and a commuted sum contribution for the remaining 0.90. In this case the applicant has proposed 19 dwellings, however, should only 18 dwellings be provided the commuted sum will need to be paid.

2. Housing Need Information:

- 2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2019, confirms a continuing need for housing across all tenures and a growing need for affordable housing.
- 2.2 The 2019 SHMA indicates that in Mid Suffolk there is a need for 127 new affordable homes per annum. **Ref1 SHMA 2019, p.122 – Summary section.**
- 2.3 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 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.

3. Preferred Mix for Open Market homes.

Affordable Rent = 14 dwellings

6 x 1b 2p flats @ 50sqm
6 x 2b 4p houses @ 79sqm
2 x 3b 5p houses @ 93sqm

Shared Ownership = 6 dwellings

4 x 3b 4p houses @ 79sqm
2 x 3b 5p houses @ 93sqm

This scheme proposes an affordable housing mix of 1, 2 and 3 bed affordable rent and shared ownership homes which is broadly acceptable.

This site is a S106 planning obligation site which means the affordable housing will be allocated on a district wide basis.

This application should also have regards to the Debenham Neighbourhood Plan. This site is identified in Policy Deb 5 and the NP housing policies Deb 6 and 7 outline the housing mix requirements.

The affordable units to be constructed 'tenure blind' and must not be in clusters of more than 15 dwellings. Currently the plan shows the affordable units primarily in one cluster. The affordable homes should be distributed across the development. Other requirements for affordable homes:

Properties must be built to the Housing Standards Technical guidance March 2015.

S106 affordable dwellings should be delivered grant free.

The council is granted 100% nomination rights to all the affordable units on first lets and minimum of 100% of relets in perpetuity.

- (a) not Occupy or permit Occupation of more than fifty per cent (50%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until fifty per cent (50%) of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider; and
- (b) not Occupy or permit Occupation of more than eighty per cent (80%) (rounded up to the nearest whole Dwelling) Market Housing Units in each Phase until all of the Affordable Housing Units for that Phase have been constructed and are ready for Occupation and have been transferred to the Registered Provider

For all shared ownership dwellings/low cost home ownership dwellings applicants must be registered with the Help to Buy Agents for Suffolk. • Initial share purchases for shared ownership dwellings to be capped at 70%.

Any flats must be in separate blocks and capable of freehold transfer to an RP. The flatted blocks must provide bicycle storage and bin store areas.

It is preferred that the affordable units are transferred to one of the Council's partner Registered Providers – please see www.baberghmidsuffolk.gov.uk under Housing and Affordable Housing for full details or email: strategic.housing@babergmidsuffolk.gov.uk

Adequate parking and bathroom provision needs to be made for all the ground floor and bungalow affordable housing units. The parking for bungalows and ground floor flats need to pertain particular attention to current policy of Part M4(2) with regard to access, location, size of car parking, bin storage and accessibility to any communal areas or facilities.

MID SUFFOLK DISTRICT COUNCIL
MEMORANDUM

To: Alex Scott – Planning Officer
From: Sacha Tiller – Strategic Housing
Date: 25.10.2021
Proposal: Full Planning Application – Erection of 54 dwellings (including 19 affordable homes) creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.
Location: Land East Of, Aspall Road, Debenham, Suffolk, IP14 6QA

Key Points

1. Background information

This is a full planning application for 54 dwellings in total, 35% affordable housing contribution is required which equates to 18.90 affordable dwellings in accordance with local policy requirements.

We would expect to see 18 affordable homes delivered on site and a commuted sum contribution for the remaining 0.90. In this case the applicant has proposed 19 dwellings, however, should only 18 dwellings be provided the commuted sum will need to be paid.

2. Housing Need Information:

- 2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2019, confirms a continuing need for housing across all tenures and a growing need for affordable housing.
- 2.2 The 2019 SHMA indicates that in Mid Suffolk there is a need for 127 new affordable homes per annum. **Ref1 SHMA 2019, p.122 – Summary section.**
- 2.3 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 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.

3. Preferred Mix for Affordable Homes:

Affordable Rent = 14 dwellings

6 x 1 bed 2 person flats @ 50sqm
6 x 2 bed 4 person houses @ 79sqm
2 x 3 bed 5 person houses @ 93sqm

Shared Ownership = 5 dwellings

3 x 2 bed 4 person houses @ 79sqm

2 x 3 bed 5 person houses @ 93sqm

Looking at the latest drawing available to view it is clear that many of the internal roads on site are noted as 'private drive'. We need to ensure that these drives are of a good standard and that any ongoing maintenance costs of these roads are paid via service charges and not the residents of affordable housing. Please confirm this?

We would also ask that parking i.e. in the cases of dwellings 9,10,16, etc that the layout reflects the rest of the site and that parking is adjacent or opposite dwellings. We would welcome the opportunity to discuss this.

This scheme proposes an affordable housing mix of 1, 2 and 3 bed affordable rent and shared ownership homes.

This site is a S106 planning obligation site which means the affordable housing will be allocated on a district wide basis.

This application should also have regards to the Debenham Neighbourhood Plan. This site is identified in Policy Deb 5 and the NP housing policies Deb 6 and 7 outline the housing mix requirements.

The affordable units to be constructed 'tenure blind' and must not be in clusters of more than 15 dwellings. Currently the plan shows the affordable units primarily in one cluster. The affordable homes should be distributed across the development. Other requirements for affordable homes:

Properties must be built to the Housing Standards Technical guidance March 2015.

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The council is granted 100% nomination rights to all the affordable units on first lets and minimum of 100% of relets in perpetuity.

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It is preferred that the affordable units are transferred to one of the Council's partner Registered Providers – please see www.baberghmidsuffolk.gov.uk under Housing and Affordable Housing for full details or email: strategic.housing@babergmidsuffolk.gov.uk

Adequate parking and bathroom provision needs to be made for all the ground floor and bungalow affordable housing units. The parking for bungalows and ground floor flats need to pertain particular attention to current policy of Part M4(2) with regard to access, location, size of car parking, bin storage and accessibility to any communal areas or facilities.

Consultation Response Pro forma

Mid Suffolk

1	Application Number	DC-21-02982 – Land East Of, Aspall Road, Debenham.																																																														
2	Date of Response	16.03.2022																																																														
3	Responding Officer	Name:	SACHA TILLER																																																													
		Job Title:	HOUSING ENABLING																																																													
		Responding on behalf of...	HOUSING STRATEGY																																																													
4	Recommendation (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.	<p>No further comments on this application for the following reasons.</p> <p>We would expect to agree all matters for this site at reserved matters stage and in the S106.</p>																																																														
5	Discussion 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.	<p>Planning application purports to erection of 54 dwellings.</p> <p>The applicant has confirmed on 3rd March 2022 that they will provide:</p> <p style="text-align: right;">TOTAL 35 PLOTS</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="5">● Affordable Rent</td> </tr> <tr> <td style="width: 15%;"></td> <td style="width: 40%;">House type Description</td> <td style="width: 15%;">Sq.Ft / Sq M</td> <td style="width: 10%;">No.</td> <td style="width: 20%;">Plot Numbers</td> </tr> <tr> <td>539</td> <td>1 Bed apartment (2 storey)</td> <td>539 / 50.1</td> <td>6</td> <td>38,39,40,41,42,43,</td> </tr> <tr> <td>859</td> <td>2 Bed house (2 storey)</td> <td>859 / 79.8</td> <td>5</td> <td>13,14,15,18</td> </tr> <tr> <td>878</td> <td>2 Bed house (2 storey)</td> <td>878 / 81.6</td> <td>1</td> <td>44,</td> </tr> <tr> <td>904</td> <td>2 Bed house (2 storey)</td> <td>904 / 83.9</td> <td>1</td> <td>17</td> </tr> <tr> <td>1009</td> <td>3 Bed house (2 storey)</td> <td>1009 / 93.7</td> <td>2</td> <td>45,46</td> </tr> </table> <table style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="5">● Shared Ownership</td> </tr> <tr> <td style="width: 15%;"></td> <td style="width: 40%;">House type Description</td> <td style="width: 15%;">Sq.Ft / Sq M</td> <td style="width: 10%;">No.</td> <td style="width: 20%;">Plot Numbers</td> </tr> <tr> <td>878</td> <td>2 Bed house (2 storey)</td> <td>878 / 81.6</td> <td>2</td> <td>9,10</td> </tr> <tr> <td>904</td> <td>2 Bed house (2 storey)</td> <td>904 / 83.9</td> <td>1</td> <td>16</td> </tr> <tr> <td>1009</td> <td>3 Bed house (2 storey)</td> <td>1009 / 93.7</td> <td>2</td> <td>11,12</td> </tr> </table> <p style="text-align: right;">TOTAL 19 PLOTS</p>			● Affordable Rent						House type Description	Sq.Ft / Sq M	No.	Plot Numbers	539	1 Bed apartment (2 storey)	539 / 50.1	6	38,39,40,41,42,43,	859	2 Bed house (2 storey)	859 / 79.8	5	13,14,15,18	878	2 Bed house (2 storey)	878 / 81.6	1	44,	904	2 Bed house (2 storey)	904 / 83.9	1	17	1009	3 Bed house (2 storey)	1009 / 93.7	2	45,46	● Shared Ownership						House type Description	Sq.Ft / Sq M	No.	Plot Numbers	878	2 Bed house (2 storey)	878 / 81.6	2	9,10	904	2 Bed house (2 storey)	904 / 83.9	1	16	1009	3 Bed house (2 storey)	1009 / 93.7	2	11,12
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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.

	<p>Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	Recommended conditions	Should this change then planning permission should be re-sought.

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.

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 08 Mar 2022 04:27:53

To:

Cc:

Subject: FW: MSDC Planning Re-consultation Request - DC/21/02982 - FUL

Attachments:

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

From: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>

Sent: 08 March 2022 15:56

To: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Re-consultation Request - DC/21/02982 - FUL

Public Realm Officers have no additional comments to make on the recently received documents. Our earlier concerns over the choice of 'native species' for the wetland and other areas still stands.

Regards

Dave Hughes

Public Realm Officer

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

From: planningblue@baberghmidsuffolk.gov.uk <planningblue@baberghmidsuffolk.gov.uk>

Sent: 04 March 2022 15:53

To: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>

Subject: MSDC Planning Re-consultation Request - DC/21/02982 - FUL

Please find attached planning re-consultation request letter relating to planning application - DC/21/02982 - Land East Of, Aspoll Road, Debenham, Suffolk IP14 6QA

Kind Regards

Planning Support Team

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Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested.

For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 22 Oct 2021 10:21:01

To:

Cc:

Subject: FW: MSDC Planning Re-consultation Request - DC/21/02982

Attachments:

-----Original Message----- From: BMSDC Public Realm Consultation Mailbox Sent: 22 October 2021 10:08 To: BMSDC Planning Area Team Blue Subject: RE: MSDC Planning Re-consultation Request - DC/21/02982 Public Realm Officers have no objections to this development in relation to the amount of public open space associated with this development. We would expect to have seen detail as to the species of tree being considered and detail as to the open space grassland. We agree with other comments made that some of the grassland should be sown and managed as wildflower meadow. The Planning Layout drawing refers to a landscape Drawing where details of the open space etc can be seen. This drawing is not included in those available to view Regards Dave Hughes Public Realm Officer

From: BMSDC Planning Area Team Blue <planningblue@baberghmidsuffolk.gov.uk>

Sent: 23 Dec 2021 09:17:08

To:

Cc:

Subject: FW: MSDC Planning Re-consultation Request - DC/21/02982

Attachments:

-----Original Message----- From: BMSDC Public Realm Consultation Mailbox Sent: 22 December 2021 14:20 To: BMSDC Planning Area Team Blue Subject: RE: MSDC Planning Re-consultation Request - DC/21/02982 Public Realm Officer consider the choice of plants for the attenuation basin to be inappropriate. Bog Cotton (Eriophorum) is not generally found in Suffolk and has never been recorded in this location. Miscanthus is an ornamental grass from Asia that requires well drained soil so is not suitable for planting amongst species requiring damp conditions. If the intention is to create an attenuation basin with a natural feel that enhances biodiversity then the plant species should reflect that.

Similarly the 'Medium Mixes' are ornamental species more suited to domestic gardens and formal urban areas. They seem at odds with the proposed treatment of the grassland areas (native wetland and wildflower mixes). The planting proposals are not supported by the Public Realm team and it is considered that a mix that produces a more naturalistic appearance should be considered Regards Dave Hughes Public Realm Officer (Countryside) -----Original Message----- From: planningblue@baberghmidsuffolk.gov.uk Sent: 21 December 2021 13:55 To: BMSDC Public Realm Consultation Mailbox Subject: MSDC Planning Re-consultation Request - DC/21/02982 Please find attached planning re-consultation request letter relating to planning application - DC/21/02982 - Land East Of, Aspall Road, Debenham, Suffolk IP14 6QA Kind Regards Planning Support Team Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council. Babergh District Council and Mid Suffolk District Council (BMSDC) will be Data Controllers of the information you are providing. As required by the Data Protection Act 2018 the information will be kept safe, secure, processed and only shared for those purposes or where it is allowed by law. In some circumstances however we may need to disclose your personal details to a third party so that they can provide a service you have requested, or fulfil a request for information. Any information about you that we pass to a third party will be held securely by that party, in accordance with the Data Protection Act 2018 and used only to provide the services or information you have requested. For more information on how we do this and your rights in regards to your personal information and how to access it, visit our website.

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Kind Regards

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Consultee Comments for Planning Application DC/21/02982

Application Summary

Application Number: DC/21/02982

Address: Land East Of Aspoll Road Debenham Suffolk IP14 6QA

Proposal: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

Case Officer: Alex Scott

Consultee Details

Name: Mrs Linda Hoggarth

Address: 26 Gipping Way, Bramford, Ipswich, Suffolk IP8 4HP

Email: Not Available

On Behalf Of: Mid Suffolk Disability Forum

Comments

Whilst there is a reference to ensuring inclusive access, the Mid Suffolk Disability Forum would like to state that all dwellings should meet Part M4 of the Building Regulations.

All dwellings should be visitable and meet Part M4(1), and 50% of the dwellings should meet the 'accessible and adaptable' standard Part M4(2). It is our view that in housing developments of over 10 dwellings, at least one of the dwellings should be built to wheelchair standard Part M4(3).

We note that some bungalows are planned and these will assist people with mobility problems and people who wish to downsize from larger dwellings. It was not possible to glean from the documents how many dwellings would be bungalows.

Every effort should be made to ensure all footpaths are wide enough for wheelchair users, with a minimum width of 1500mm, and that any dropped kerbs are absolutely level with the road for ease of access.

Surfaces should be firm, durable and level. No loose gravel, cobbles or uneven setts should be used.

We note that no car parking spaces of the 127 being provided are described as spaces suitable to assist people with mobility difficulties.

Consultee Comments for Planning Application DC/21/02982

Application Summary

Application Number: DC/21/02982

Address: Land East Of Aspall Road Debenham Suffolk IP14 6QA

Proposal: Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping.

Case Officer: Alex Scott

Consultee Details

Name: Mrs Linda Hoggarth

Address: 26 Gipping Way, Bramford, Ipswich, Suffolk IP8 4HP

Email: Not Available

On Behalf Of: Mid Suffolk Disability Forum

Comments

The Mid Suffolk Disability Forum has no further comments to make.

Patron Her Majesty The Queen

The British Horse Society

Email enquiry@bhs.org.uk

Abbey Park,

Website www.bhs.org.uk

Stareton,

Tel 02476 840500

Kenilworth,

Fax 02476 840501

Bringing Horses and People Together

Warwickshire CV8 2XZ



Alex Scott
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
IP1 2BX
Via email

25th May 2021

Dear Mr Scott,

RE: DC/21/02982 | Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping. | Land East Of Aspoll Road Debenham Suffolk IP14 6QA

I am responding to this consultation on behalf of The British Horse Society, an equestrian Charity with over 119,000 members representing the UK's 3 million regular riders and carriage drivers. Nationally equestrians have just 22% of the rights of way network. In Suffolk, they have just 18% of the rights of way network, increasingly disjointed by roads which were once quiet and are now heavily used by traffic resulting from development within the County. It is therefore important that these public rights are protected.

Increasing pressure for development of houses and industry is making even fewer of those bridleways and byways available. Ancient 'green lane' bridleways, byways and unsurfaced roads are being tarmacked as access roads or cycle tracks and engulfed by new development spreading into the countryside. Traffic increases with new development or change of use so roads become even less safe for riders and carriage-drivers (equestrians) to use to access any traffic-free routes there may be. Riders are also increasingly excluded from verges by creation of foot-cycleways – segregated provision for other vulnerable non-motorised users but equestrians are excluded and forced into the carriageway. Historically verges have provided a refuge and could, if mown, provide a segregated route.

Road Safety is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and February 2021, the BHS received reports of 5,784 road incidents, in which 441 horses and 44 people were killed. Research indicates however that only 1 in 10 incidents are being reported to the BHS; in 2016-17 alone, 3,863 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics).

The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <https://www.bhs.org.uk/our-work/safety/dead-slow> – we recommend taking a few minutes to watch the 'Dead Slow' virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).

Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however it is simply because people have nowhere else to exercise their horses. The main off-road access available to them is the network of Rights of Way (RoW). England and Wales have over 140,000 miles of RoW, but only 22% of this network is available for horse riders (who may

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only use routes designated as Bridleways and Byways) and a mere 5% to carriage drivers (who only have access to Byways). An additional factor is that the network is fragmented, and roads are often the only available links between one RoW and the next.

The demand for safe access to the countryside for the health and well being of local residents who have been subjected to Covid 19 lockdown restrictions has increased tenfold. It is acknowledged that it is highly likely that the post Covid new 'norm' will see significant changes in the work / home lifestyle balance resulting in increased pressure on the rights of way network. During the pandemic, the value of horses has increased substantially with people spending more time at home looking to find enjoyable ways to exercise, they are able and want to own horses. It is highly likely that the need and demand for improved equestrian access is likely to rise.

Failure to accommodate the needs of these users would be contrary to National and Local Policies such as:

Highways England Accessibility Strategy states:

'Our vision focuses on supporting our road users' journeys, pedestrians, cyclists, equestrians, those with disabilities (such as users with mobility or sensory impairments) and other vulnerable users – while delivering longer-term benefits for communities and users alike.

We want to address the barriers our roads can sometimes create, help expand people's travel choices, enhance and improve network facilities, and make everyday journeys as easy as possible.

This will be achieved by ensuring our network supports and contributes to accessible, inclusive and integrated journeys which are safe, secure, comfortable and attractive.'

NPPF policy 58 Requiring Good design

Create safe and accessible environments.

Paragraphs 73 and 81 of the NPPF require Local Authorities to plan positively for access to high quality open spaces for sport and recreation which can make important contributions to the health and wellbeing of communities and to plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation.

NPPF Section 8

Promoting healthy communities

Policy 73 access to high quality open spaces for sport and recreation and can make important contribution to the health and wellbeing of communities.

Policy 75 Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users. For example by adding links to existing rights of way networks.

Policy 81 local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation.

The Suffolk Rights of Way Improvement Plan – '2.3 Connectivity – 2.3.1 Take a whole highways approach when considering the journeys of vulnerable users.'

The British Horse Society's report Making Ways for Horses – off-road Equestrian Access in England – Equestrian Access Forum August 2012, highlights the importance of horse riding for health and well being. Access for horse riders, which inevitably involves crossing roads, is central to riding activities without which the level of participation is likely to decline which will have a negative impact on the local economy (Making Ways for Horses – off-road Equestrian Access in England – Equestrian Access Forum August 2012).

Mitigation must therefore be considered for the equestrian community; The British Horse Society believes that this development provides great opportunities to provide safe off-road routes for all vulnerable road users including equestrians and we would welcome the opportunity to discuss these opportunities at the earliest stage. In order to maximise opportunities within Suffolk to help provide more off-road links for equestrians they should support the automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible.

Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS are doing in partnership with Cycling UK in the current 'Be Nice, Say Hi!' campaign and with Sustrans in their 'Paths for Everyone' initiative.

The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.)

Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that:

“We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.”

It is essential that in projects such as this, every opportunity is taken to benefit as many people as possible including those least active in the population (NHS, 2019). Therapeutic and physical benefits of horse riding and carriage driving have been proven for people with disabilities (Favali and Milton, 2010). According to Church et al (2010) over 90% of equestrians are women and 37% of these are over 45 years of age and over a third would pursue no other physical activity. 'Horse riding induces physiologically positive effects such as muscle strength, balance...and psychologically positive changes' (Sung et al, 2015). In the current climate mental health is hugely important and horse riding and carriage driving play a large part in enhancing physical and psychological health therefore should be included in improving quality of life and wellbeing through an inclusive transport system accessible to all which emphasises sustainable and active travel.

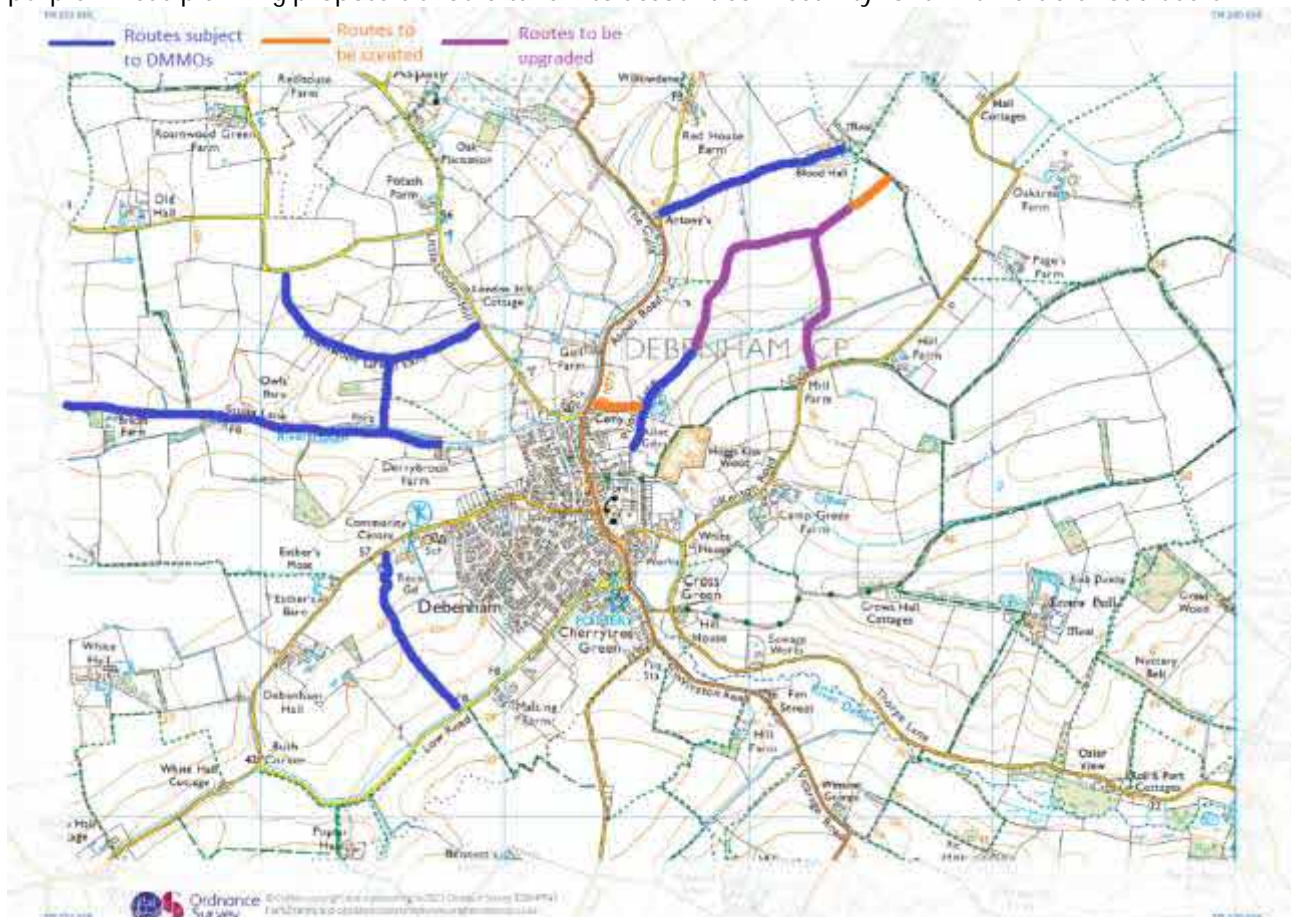
Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. Most riders and carriage-drivers wish to take their horses out on bridleways and byways, away from motor traffic, for the physical and mental health benefits to animal and human, in exactly the same way as most walkers (with and without dogs) and cyclists. Many are unable to do so because the traffic on tarmac roads is too dangerous for such vulnerable road users, and there are generally so few traffic free routes available to equestrians. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the [Changing Lives through Horses](#) initiative.

Equestrianism is a popular activity in this part of Suffolk, and one which contributes significantly to the local economy. The equestrian community in Suffolk currently has many difficulties in finding safe access within the area, as identified in Suffolk's policies. Many of these issues could be addressed and resolved through good planning of future routes. We hope therefore that the applicant will support this, and local equestrians affected by this development, and would be happy to support and facilitate consultation with the local equestrian community.

The British Horse Society has no objection to this application in principle but believes for this application to be compliant with National and Local Policies the proposals for proposed pedestrian routes throughout the site should be multi-user routes for all Non-Motorised Users including equestrians.

Equestrians have not been included within any part of this application. Exclusion of equestrians from any safe access provision for cyclists is not only discriminatory and contrary to the ethos of the Equality Act 2010, but it also actually puts equestrians in increased danger. It is to be avoided. Safe access must be available all vulnerable road users.

The BHS believes that historical evidence indicates that a number of routes surrounding the site are unrecorded, these routes can be reasonably alleged to subsist at a minimum of bridleway status. These public rights should be asserted and not be allowed to be subsumed within this development or anything beyond it. An application to the County Council to have them recorded as such is likely to be forwarded in due course. The route shown along Priory Lane on the map below as 'routes subject to DMMO' should be upgraded to at least Bridleway status if not Restricted Byway status as a condition of the permission being granted. With regards to this development the BHS believe the below improvements would adequately include equestrian access through the site by correctly recording routes and creating routes within and around the development site to improve connectivity and upgrading the 1 route shown in purple. These planning proposals should take into account connectivity for all vulnerable road users.



If you have any questions, or would like to discuss any aspect of this response further, please do not hesitate to contact me.

Yours sincerely



Charlotte Ditchburn (Miss.)
Access Field Officer, East Region



Suffolk Wildlife Trust

Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org



Alex Scott
Planning Department
Babergh and Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich, IP1 2BX

10th June 2021

Dear Alex,

RE: DC/21/02982 - Full Planning Application - Erection of 54No dwellings (including 19 affordable), creation of vehicular and pedestrian access, public open space, infrastructure and landscaping. Land East Of Aspall Road, Debenham, IP14 6QA

Thank you for sending us details of this application, we have the following comments:

We note and agree with Place Service's comments (June 2021) that further assessment is required regarding potential impacts to farmland birds, with particular focus on skylark. Skylarks are a Red Listed Bird of Conservation Concern in the UK¹ and listed under Section 41 of the Natural Environment and Rural Communities (NERC) act². Therefore, assessment of the number of breeding territories onsite is required to inform any potential offsite mitigation. If mitigation is required, this should be detailed within a Skylark Mitigation Strategy, with the approach agreed prior to the determining of the application.

We note as part of the proposals that new planting is proposed within the landscaping of the site however, it is unclear what species will be used. Whilst the application dictates that these features will be planted, there is no indication of the composition and range of species. In order to maximise the potential for biodiversity, a diverse range of native species should be used and this detailed within a plan. The SuDS features and open spaces should also be sown or planted with an appropriate wildflower mix, to increase their biodiversity value. Furthermore, the Planning Layout states 'existing hedging to be trimmed back and tided' however, the Ecological Appraisal (Carter Sustainability, May 2021) recommends reducing maintenance to allow hedge width to develop. Therefore, any management should be detailed within a Landscape and Ecological Management Plan, which should also detail how the habitats and open spaces on site are to be appropriately managed for biodiversity.

As foraging and commuting bats have been identified as potentially using hedgerows and trees adjacent to the site, then it is important that there is no light spill from external lighting

¹ <https://www.bto.org/our-science/publications/psob>

² <http://publications.naturalengland.org.uk/publication/4958719460769792>

and that dark corridors are retained around the site for the foraging and commuting bats. Therefore, a lighting strategy in accordance with current guidelines³ should be designed. We recommend that integral swift nest bricks should be incorporated into buildings that are of minimum two storeys. The incorporation of swift nest bricks is an established way to enhance biodiversity within a development and provide net gain. Therefore, we request that this is done to provide enhancement to this Suffolk Priority Species, whose numbers have seen a dramatic decline in recent years.

In accordance with NPPF para 175d, proposals should demonstrate a 'measurable' net gain in biodiversity. This is transposed to the emerging Environment Bill which is expected to put a requirement for all proposals to achieve a 10% net gain in biodiversity; whilst not yet formally released, this level is already being implemented as good practice across the country. Therefore, we believe this development should seek a minimum of 10% biodiversity net gain.

There are records of Hedgehog, a UK and Suffolk Priority Species, in the surrounding area. To maintain connectivity for this species, we recommend maintaining hedgehog permeable boundaries (with gaps of 13x13cm at ground level) as part of this development.

A Biodiversity Enhancement Strategy should be produced, detailing the how the enhancements made within the Ecological Assessment are to be incorporated within the development, including their locations.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jacob Devenney
Planning and Biodiversity Adviser

³ ILP, 2018. Bat Conservation Trust Guidance Note 08/18: Bats and artificial lighting in the UK