



Environment  
Agency

Stuart McAdam  
Mid Suffolk District Council  
Planning Department  
131, Council Offices High Street  
Needham Market  
Ipswich  
IP6 8DL

Our ref: AE/2017/121291/01-L01  
Your ref: 0030/17

Date: 17 February 2017

Dear Mr McAdam

**ERECTION OF 34 DWELLINGS WITH ASSOCIATED ACCESS ROAD, PARKING AND LANDSCAPING. PROVISION OF PUBLIC OPEN SPACE. FORMATION OF VEHICULAR ACCESSES LAND BETWEEN THE BUTTS AND, LITTLE LONDON HILL, DEBENHAM**

Thank you for your consultation received on 30 January 2017. We have inspected the application, as submitted, and have no objection to the planning application, providing that you are satisfied that the development would be safe for its lifetime and you assess the acceptability of the issues within your remit.

**Flood Risk**

Our maps shows the proposed development lies mainly within flood zone 1 and a small section to the South East of the site within Flood Zone 2. However, the application site lies in within Flood Zone 3a, the high probability zone. The proposal is for the erection of 34 dwellings, which is classified as a 'more vulnerable' development, as defined in Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance.

We are satisfied that the flood risk assessment, referenced 109/2015/FRArevA and dated December 2016, provides you with the information necessary to make an informed decision. The important points to note are:

- All proposed development lies within Flood Zone 1 and 2. Please refer to our Flood Risk Standing Advice.
- Appendix E, Drawing "Proposed Site Layout" shows all proposed development lies outside the 1 in 100 (1%) chance in any year, including an allowance of 35% for climate change flood extent.
- The access and egress route travels through Flood Zones 1 and therefore the site does have a safe route of access.
- Flood Storage Compensation is not required.

- A Flood Evacuation Plan has not yet been proposed.
- We would recommend that finished floor levels for the proposed development are set as high as is practically possible, ideally 300 millimetres above the 1 in 100 (1%) annual probability event level, including an allowance of 35% for climate change. This is in line with the advisory requirements of Paragraphs 059 and 060 of the National Planning Policy Framework's Planning Practice Guidance, which advises that there should be no internal flooding in 'more vulnerable' developments in a design flood 1 in 100 (1%) annual probability event inclusive of climate change.

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

The applicant has undertaken climate change analysis to incorporate the 35% and 65% allowances to the 1% (1 in 100) flood event. The applicant has calculated levels of 36.55 m AOD and 36.73m AOD for the 1 in 100 (1%) AEP 35% Climate Change and 1 in 100 (1%) AEP 65% Climate Change events.

We have undertaken a linear analysis of the flows and the potential impacts of these increases for climate change. This can be seen in the table below:

| <b>Basic Calculations = *Existing / **Projected</b> |          |              |
|---|----------|--------------|
| Return Period                                       | Flow M/S | Levels m AOD |
| 1 in 100 (1%) AEP *                                 | 36.44    | 36.44        |
| 1 in 100 (1%) AEP 20% Climate Change *              | 36.5     | 36.5         |
| 1 in 1000 (0.1%) AEP *                              | 36.73    | 36.73        |
| 1 in 1000 (0.1%) AEP 20% Climate Change *           | 36.82    | 36.82        |
| 1 in 100 (1%) AEP 35% Climate Change **             | 49.14    | 36.55        |
| 1 in 100 (1%) AEP 65% Climate Change **             | 60.12    | 36.73        |

The 1 in 100 (1%) AEP 65% Climate Change Allowance is below the current 1 in 1000 (0.1%) AEP 20% Climate Change Allowance level. Therefore when comparing the flood extent of the current 1 in 1000 (0.1%) AEP 20% Climate Change Allowance to the location of the proposed development, it is clear the development still lays outside this extent and within Flood Zone 1.

### **Guidance for Local Council**

#### Sequential Test and Exception Tests

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

#### Safety of Inhabitants – Emergency Flood Plan

You are the competent authority on matters of evacuation or rescue, and therefore should assess the adequacy of the evacuation arrangements, including the safety of

the route of access/egress from the site in a flood event or information in relation to signage, underwater hazards or any other particular requirements. You should consult your emergency planners as you make this assessment.

You should be satisfied with any emergency flood plan submitted and find it adequate for the purposes of the local authority flood plan (for example, possible rescue of inhabitants during a flood, temporary accommodation whilst flood waters subside and properties are uninhabitable).

If you are not satisfied with the emergency flood plan, then we would recommend you refuse the application on the grounds of safety during a flood event, as users would be exposed to flood hazards on access/egress routes.

#### Other Sources of Flooding

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

#### **Informative - Environmental Permitting Regulations**

Flood Defence Consents now fall under the new Environmental Permitting (England and Wales) Regulations 2010 system (EPR). The applicant may need an environmental permit for flood risk activities if they want to do work in, under, over or within 8 metres (m) from the river and from any flood defence structure or culvert of the River Deben, designated a 'main river'.

The EPR is a risk-based framework that enables us to focus regulatory effort towards activities with highest flood or environmental risk. Lower risk activities will be excluded or exempt and only higher risk activities will require a permit. Your proposed works may fall under either one or more of the below:

- 'Exemption,
- 'Exclusion',
- 'Standard Risks Permit'
- 'Bespoke permit.

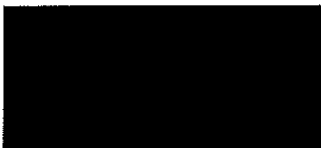
New forms and further information can be found at:

<https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> . You're breaking the law if you carry out these activities without a permit if you should have one.

Please contact our National Customer Contact Centre to assess which category your proposed works fall under. They will then be able to tell you the classification of your application, the fee associated with your application, and how to proceed forward. They can be contacted by email: [floodriskactivity@environment-agency.gov.uk](mailto:floodriskactivity@environment-agency.gov.uk)

We trust this advice is useful.

Yours sincerely



**Miss Eleanor Stewart**  
**Sustainable Places - Planning Advisor**

Direct dial 020 8474 8097

Email [planning.ipswich@environment-agency.gov.uk](mailto:planning.ipswich@environment-agency.gov.uk)

cc East Coast Planning Services

**Suffolk Fire and Rescue Service**

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

Mid Suffolk District Council  
Planning Department  
131 High Street  
Needham Market  
Ipswich  
IP6 8DL

lw

Your Ref: 0030/17  
Our Ref: FS/F200891  
Enquiries to: Angela Kempen  
Direct Line: 01473 260588  
E-mail: [Fire.BusinessSupport@suffolk.gov.uk](mailto:Fire.BusinessSupport@suffolk.gov.uk)  
Web Address: <http://www.suffolk.gov.uk>

Date: 01/03/2017

Dear Sirs

**Land Bounded by Derry Brook Lane and Little London Hill, Debenham, Suffolk**  
**Planning Application No: 0030/17**

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 firefighting, 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 Authority recommends that fire hydrants be installed within this development. However, it is not possible, at this time, to determine the number of fire hydrants required for firefighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

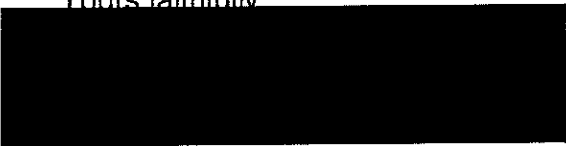
OFFICIAL

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

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

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

Yours faithfully



Mrs A Kempen  
Water Officer

Copy: Mr Martin Price, East Coast Planning Services Ltd, 97 The Street, Melton, Woodbridge, Suffolk, IP12 1PR.

Enc: Sprinkler information.


**Suffolk Fire and Rescue Service**

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

Mid Suffolk District Council  
 Planning Department  
 131 High Street  
 Needham Market  
 Ipswich  
 IP6 8DL

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

Date: 01/03/2017

**Planning Ref: 0030/17**

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING**

**ADDRESS: Land Bounded by Derry Brook Lane and Little London Hill, Debenham, Suffolk.**

**DESCRIPTION: 34 Dwellings.**

**NO: HYDRANTS REQUIRED.**

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

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

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

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

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

OFFICIAL

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.

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

Yours faithfully



Mrs A Kempen  
Water Officer



**Sent:** 18 July 2017 08:19  
**To:** BMSDC Planning Area Team Blue  
**Subject:** 0030/17 - Consultation Response

Dear Sir or Madam,

Our ref: 220666  
Your ref: **0030/17**

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 01 February 2017

The advice provided in our previous response applies equally to this **amendment** although we made no objection to the original proposal.

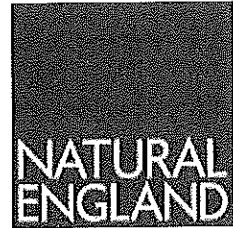
The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

Alice Watson  
Consultations Team  
Natural England  
Electra Way  
Crewe Business Park  
Crewe  
Cheshire  
CW1 6GJ  
Tel:0300 060 3900

Date: 01 February 2017  
Our ref: 207372  
Your ref: 0030/17



Stuart McAdam  
Planning Services  
Mid Suffolk District Council  
131 High Street  
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T 0300 060 3900

**BY EMAIL ONLY**

Dear Mr McAdam

**Planning consultation:** Outline planning permission sought for the erection of up to 34 Dwellings.  
Formation of Vehicular Access to Little London Hill  
**Location:** Land bounded by Derry Brook Lane and Little London Hill, Debenham

Thank you for your consultation on the above dated 30 January 2017 which was received by Natural England on 30 January 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**The Wildlife and Countryside Act 1981 (as amended)**  
**The Conservation of Habitats and Species Regulations 2010 (as amended)**

Natural England's comments in relation to this application are provided in the following sections.

**Statutory nature conservation sites – no objection**

Based upon the information provided, Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.

**Protected species**

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published [Standing Advice](#) on protected species.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

### **Priority Habitat as identified on Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006**

The consultation documents indicate that this development includes an area of priority habitat, as listed on Section 41 of the Natural Environmental and Rural Communities (NERC) Act 2006. The National Planning Policy Framework states that 'when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity. If significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.'

### **Local sites**

If the proposal site is on or adjacent to a local site, e.g. Local Wildlife Site, Regionally Important Geological/Geomorphological Site (RIGS) or Local Nature Reserve (LNR) the authority should ensure it has sufficient information to fully understand the impact of the proposal on the local site before it determines the application.

### **Biodiversity enhancements**

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that '*Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*'. Section 40(3) of the same Act also states that '*conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat*'.

### **Landscape enhancements**

This application may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green space provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.

### **Sites of Special Scientific Interest Impact Risk Zones**

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the [data.gov.uk](http://data.gov.uk) website.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Richard Sykes  
Consultations Team

Your ref: 0030/17  
Our ref: Debenham – site fronting The Butts &  
Little London Hill 00049603  
Date: 11 July 2017  
Enquiries to: Neil McManus  
Tel: 01473 264121 or 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Mr Ian Ward,  
Growth & Sustainable Planning,  
Mid Suffolk District Council,  
Council Offices,  
131 High Street,  
Needham Market,  
Ipswich,  
Suffolk,  
IP6 8DL

Dear Ian,

**Debenham: site fronting The Butts & Little London Hill – developer contributions**

I refer to the use of land for the erection of up to 25 Dwellings. Formation of vehicular access to Little London Hill (revised proposal). This letter replaces the previous consultation response dated 18 February 2017.

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

Whilst most infrastructure requirements will be covered under Mid Suffolk District Council's Regulation 123 list of the CIL charging schedule it is nonetheless the Government's intention that all development must be sustainable as set out in the National Planning Policy Framework (NPPF). On this basis the County Council sets out below the infrastructure implications with costs, if planning permission is granted and implemented.

A planning obligation or planning conditions will cover site specific matters.

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

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

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

Mid Suffolk District Council adopted 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.

### **Community Infrastructure Levy**

Mid Suffolk District Council adopted a CIL Charging Schedule on 21st January 2016 and will charge CIL on planning permissions granted from 11th April 2016. Regulation 123 requires mid Suffolk to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

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

As of 6th April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy. The requirements being sought here would be requested through CIL, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

The details of the impact on local infrastructure serving the development is set out below and will form the basis of a future CIL bid for funding:

1. **Education.** Refer to the NPPF paragraph 72 which states 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

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

SCC anticipates the following **minimum** pupil yields from a development of 25 dwellings, namely:

- a. Primary school age range, 5-11: 6 pupils. Cost per place is £12,181 (2017/18 costs).

- b. Secondary school age range, 11-16: 5 pupils. Cost per place is £18,355 (2017/18 costs).
- c. Secondary school age range, 16+: 1 pupil. Costs per place is £19,907 (2017/18 costs).

The local catchment schools are Sir Robert Hitcham's CEVA Primary School, Debenham High School, and Hartismere School.

At the primary school level there is forecast to be surplus places available to accommodate all the primary age pupils forecast to arise from the proposed development. However, based on existing forecasts SCC will have no surplus places available at the catchment secondary schools for which CIL funding of at least £111,682 (2017/18 costs) will be sought.

- 2. Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4-year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours' free early years' education for all disadvantaged 2 year olds. From these development proposals SCC would anticipate up to 3 pre-school pupils.

This development is in the Debenham Ward, where there is an existing deficit of 32 places. In this Ward are the following providers; Debenham Roundabout Pre-School and Sir Robert Hitcham School. On this basis CIL funding of £18,273 would be sought in this matter.

From September 2017, working families may get an additional 15 hours' free childcare entitlement per week on top of the current 15 hours, giving a total of 30 hours a week for 38 weeks of the year.

- 3. Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:
- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
  - b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
  - c. Local neighbourhoods are, and feel like, safe, interesting places to play.
  - d. Routes to children's play spaces are safe and accessible for all children and young people.
- 4. Transport issues.** Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & 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 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Sam Harvey will coordinate this.

A planning obligation or planning conditions will cover site specific matters.

Suffolk County Council, in its role as 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.

5. **Libraries.** 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. £5,400, which will be spent on enhancing provision at the nearest library. 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  $(30 \times £3,000) = £90,000$  per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting healthy communities'.
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.

7. **Supported Housing.** In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic. Following the replacement of the Lifetime Homes standard, designing homes to the new



'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. 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 local planning authority's housing team to identify local housing needs.

8. **Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

On 18 December 2014 the Secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that, in considering planning applications:

*"Local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate."*

The changes set out in the MWS took effect from 06 April 2015.

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 fire-fighting which will allow SCC to make final consultations at the planning stage.
10. **Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or

exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

**11. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

**12.** The above information is time-limited for 6 months only from the date of this letter.

The above will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented.

I would be grateful if the above information can be provided to the decision-taker in respect of this planning application.

Yours sincerely,

Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Strategic Development – Resource Management

cc Carol Barber, Suffolk County Council  
Sam Harvey, Suffolk County Council  
Floods Planning, Suffolk County Council

Your Ref: MS/0030/17  
Our Ref: 570\CON\2453\17  
Date: 11<sup>th</sup> July 2017  
Highways Enquiries to: martin.egan@suffolk.gov.uk



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

Email:

The Planning Officer  
Mid Suffolk District Council  
131 High Street  
Ipswich  
Suffolk  
IP6 8DL

**For the Attention of: Ian Ward**

Dear Sir,

**TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/0030/17**

**PROPOSAL:** Use of land for the erection of up to 25 Dwellings. Formation of Vehicular Access to Little London Hill (revised proposal).

**LOCATION:** Site Fronting The Butts & Little London Hill, Debenham, Stowmarket, Suffolk

**ROAD CLASS:**

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:

My highway conditions which I recommended on 8th February 2017 are still applicable for the latest proposals shown on Revision F of the Proposed Site Layout.

Yours faithfully

**Mr Martin Egan**

**Highways Development Management Engineer**  
Strategic Development – Resource Management

Your Ref: MS/0030/17  
Our Ref: 570\CON\0387\17  
Date: 8<sup>th</sup> February 2017  
Highways Enquiries to: martin.egan@suffolk.gov.uk



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

The Planning Officer  
Mid Suffolk District Council  
131 High Street  
Ipswich  
Suffolk  
IP6 8DL

**For the Attention of:** Stuart McAdam

Dear Sir,

**TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/0030/17**

**PROPOSAL:** Outline planning permission sought for the erection of up to 34 Dwellings.  
Formation of Vehicular Access to Little London Hill.

**LOCATION:** Site Fronting The Butts & Little London Hill, Debenham, Stowmarket, Suffolk

**ROAD CLASS:**

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:

1

Condition: The gradient of the new vehicular access road shall not be steeper than 1 in 25 for the first twelve metres measured from the nearside edge of the adjacent metalled carriageway.

Reason: To ensure that vehicles can enter and leave the public highway in a safe manner.

2

Condition: Before any of the hereby approved new dwellings are first occupied Little London Hill is to be improved across the frontage of the site to include road widening, footway provision and road warning signs generally as shown on the submitted drawing 'Proposed Site Layout' Revision E and in accordance with details that shall first have been submitted to and approved by the Local Planning Authority.

Reason: To improve vehicular and pedestrian access to the site.

3 ER 1

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

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

#### 4 ER 2

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

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

#### 5 GPDO 1

Condition: Notwithstanding the provisions of Part 2 Class B of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) the vehicular access to the site shall be from Little London Hill only.

Reason: In the interests of highway safety.

#### 6 P 2

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

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety.

#### 7 V 3

Condition: Before the access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 43 metres in each direction along the edge of the metalled carriageway from the centre of the access (Y dimension).

Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

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

#### 8 NOTE 02

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. Any conditions which involve work within the limits of the public highway do not give the applicant permission to carry them out. Unless otherwise agreed in writing all works within the public highway shall be carried out by the County Council or its agents at the applicant's expense. The County Council's Central Area Manager must be contacted on Telephone: 01473 341414. Further information go to: <https://www.suffolk.gov.uk/roads-and-transport/parking/apply-for-a-dropped-kerb/>

A fee is payable to the Highway Authority for the assessment and inspection of both new vehicular crossing access works and improvements deemed necessary to existing vehicular crossings due to proposed development.

#### 9 NOTE 07

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

10 NOTE 12

The existing street lighting system may be affected by this proposal.

The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 01284 758859, in order to agree any necessary alterations/additions to be carried out at the expense of the developer.

Yours faithfully

**Mr Martin Egan**  
**Highways Development Management Engineer**  
Strategic Development – Resource Management

**From:** Nathan Pittam  
**Sent:** 11 July 2017 11:46  
**To:** X Delete Aug 17 - Planning Admin  
**Subject:** 0030/17/OUT. EH - Land Contamination.

**EP Reference : 196254**  
**0030/17/OUT. EH - Land Contamination.**  
**SH, Street Record, Derry Brook Lane, Debenham, STOWMARKET, Suffolk.**  
**Reason(s) for re-consultation: Change of description - revised proposal: Use of land for the erection of up to 25 Dwellings. Formation of Vehicular Access to Little London Hill (revised proposal).**

Many thanks for your request for comments in relation to the above application. I can confirm that nothing in the revised application would alter my previous consultation response where I raised no objections to the proposed development.

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](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)  
Work: 01449 724715  
Mobile: 07769 566988  
websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)



## Ian Ward

---

**From:** Jason Skilton  
**Sent:** 26 July 2017 12:57  
**To:** X Delete Aug 17 - Planning Emails  
**Cc:** Ian Ward; Martin Price  
**Subject:** 2017-07-26 JS reply Land Bounded By Derry Brook Lane And Little London Hill Debenham Ref 0030/17

Dear Ian Ward,

**Subject: Land Bounded By Derry Brook Lane And Little London Hill Debenham Ref 0030/17**

Suffolk County Council, Flood and Water Management have reviewed application ref 0030/17.

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

1. Flood Risk Assessment and Drainage Strategy (including appendices) Ref109/2015/FRA ref E
  - a. Appendix A Location Plan
  - b. Appendix B Ground Investigation Report
  - c. Appendix C Existing Greenfield Rate Calculation
  - d. Appendix D Environment Agency Flood Data
  - e. Appendix E Indicative Drainage Layout & Proposed Layout
  - f. Appendix F Micro-Drainage Calculation
  - g. Appendix G Anglian Water Waste Water Asset Records – Extract
2. Phase I Contaminated Land Assessment OES16-004PARK/1

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

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

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

**From:** RM Floods Planning  
**Sent:** 31 January 2017 13:11  
**To:** Planning Admin  
**Cc:** Samantha Summers; Giles Bloomfield (giles@miles-water.com)  
**Subject:** 2017-01-31 JS Reply Land bounded by Derry Brook Lane and Little London Hill, Debenham Ref 0030/17

Suffolk County Council, Flood and Water Management can make the following initial comment to this outline application.

The southern part of the site is partly within flood zone 3 of the River Deben.

Based on Mircodrainage the Qbar rate for the site is 4.9l/s and not 6.9l/s as stated in the submitted FRA and used in the calculations.

Infiltration test have been undertaken and showed no sign of suitable permeable soils, therefore based on the NPPG hierarchy a controlled discharge to the adjacent watercourse (River Deben, main river) would be the preferred option.

We would proposed that in order to get betterment to the flood risk of Deben the greenfield run off rate should be reduced.

A discharge consent from the Environment Agency would be required for a discharge into the River Deben which then flows into an East Suffolk IDB area (River Deben North catchment 184).

It is not clear from the indicative surface water drainage layout how they propose to convey the water from the non-permeable area e.g. roofs, driveways, roads etc. to the proposed below ground area. It is also not preferable to use below ground storage and an above ground storage basin would be preferable.

The proposed below ground attenuation area is I believe located in flood zone 3 based on liddar data and this is not acceptable, so an alternative local should be proposed.

| Pre-app | Outline | Full | Reserved Matters | Discharge of Conditions | Document Submitted   |
|---------|---------|------|------------------|-------------------------|--|
| ✓       | ✓       | ✓    |                  |                         | Flood Risk Assessment/Statement (Checklist)  |
|         | ✓       | ✓    |                  |                         | Drainage Strategy/Statement & sketch layout plan (checklist)   |
|         | ✓       |      |                  |                         | Preliminary layout drawings  |
|         | ✓       |      |                  |                         | Preliminary "Outline" hydraulic calculations   |
|         | ✓       |      |                  |                         | Preliminary landscape proposals  |
|         | ✓       |      |                  |                         | Ground investigation report (for infiltration)   |
|         | ✓       | ✓    |                  |                         | Evidence of 3 <sup>rd</sup> party agreement to discharge to their system (in principle/consent to discharge) |
|         |         | ✓    |                  | ✓                       | Maintenance program and ongoing maintenance responsibilities   |
|         |         | ✓    | ✓                |                         | Detailed development layout  |

|  |  |   |   |   |   |
|--|--|---|---|---|---|
|  |  | ✓ | ✓ | ✓ | Detailed flood & drainage design drawings   |
|  |  | ✓ | ✓ | ✓ | Full structural, hydraulic & ground investigations  |
|  |  | ✓ | ✓ | ✓ | Geotechnical factual and interpretive reports, including infiltration test results (BRE365) |
|  |  | ✓ | ✓ | ✓ | Detailed landscape details  |
|  |  | ✓ | ✓ | ✓ | Discharge agreements (temporary & permanent)  |
|  |  | ✓ | ✓ | ✓ | Development management & construction phasing plan  |

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411  
Fax: 01473 216864

**From:** [planningadmin@midsuffolk.gov.uk](mailto:planningadmin@midsuffolk.gov.uk) [mailto:[planningadmin@midsuffolk.gov.uk](mailto:planningadmin@midsuffolk.gov.uk)]

**Sent:** 30 January 2017 08:40

**To:** RM Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>

**Subject:** Consultation on Planning Application 0030/17

Correspondence from MSDC Planning Services.

Location: Land bounded by Derry Brook Lane and Little London Hill, Debenham

Proposal: Outline planning permission sought for the erection of up to 34 Dwellings.  
Formation of Vehicular Access to Little London Hill

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us

within 21 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are GP1, NPPF, Cor4, CL8, SC4, Cor5, Cor1, Cor2, CSFR-FC1, CSFR-FC1.1, Cor6, Cor9, H14, H15, H16, H11, H4, H7, H13, T9, T10, H17, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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 Mid Suffolk District Council shall be understood as neither given nor endorsed by Mid Suffolk District Council.



# SUFFOLK CONSTABULARY

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Police Station, London Road Beccles

Telephone: 101 or 999 in an emergency Fax: 01473 613737 (24 hrs)

Calls may be monitored for quality control, security and training purposes.

Direct Dial:01986 835276

Date 27/07/16

Dear Sirs

REF:

I refer to your recent outline planning application ref 2910/16

I am employed within the constabulary as a Designing Out Crime Officer (DOCO). You may have previously had contact with the Police Architectural Liaison Officer which this post has replaced.

I'm writing, in this instance, to invite you to consider *Secured By Design* at an early stage of your design process. On a development of this type and size I would strongly recommend that an application for Secured by Design approval is made.

An early input at the detailed design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.

*Secured By Design* aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

These features include: secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances natural surveillance and safety.

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

I enclose for you information a copy of the Suffolk Police Design Guide for new Housing Developments which I hope you will find useful.

I hope you will consider this advice at the detailed design stage.

Yours sincerely

Alan Keely

Designing Out Crime Officer  
Suffolk Police  
Eastern Area

***Making Suffolk a safer place to live, work, travel and invest***

[www.suffolk.police.uk](http://www.suffolk.police.uk)

**From:** Keely, Alan [mailto:Alan.Keely@suffolk.pnn.police.uk]  
**Sent:** 01 February 2017 11:44  
**To:** Planning Admin  
**Subject:** 0030/17

I refer to the above and my previous response in respect of 2910/16 in July 2016

I responded in July to this proposal and wrote to the Architect at the time. The response was a general reminder about adhering to the principles of Secured by Design. Could you please ensure that the response made then is included in respect of the new application.

I've attached copies for information.

There is a reference in my letters to a Design Guide which I have not included as this is being revised.

Regards

Alan

Alan Keely  
Designing Out Crime Officer DOCO  
East Area  
Suffolk Constabulary  
Beccles Police Station  
01986 835276  
07739777646

[Click here for further Crime Reduction Advice](#)



Please note that I work part time. If I am unavailable please contact either Nick Ray  
[Nicholas.ray@suffolk.pnn.police.uk](mailto:Nicholas.ray@suffolk.pnn.police.uk) or Alan Osborne [alan.osborne@suffolk.pnn.police.uk](mailto:alan.osborne@suffolk.pnn.police.uk)  
Alternatively leave me an email and I will get back to you on my return

This e-mail carries a disclaimer

Go here to view [Suffolk Constabulary Disclaimer](#)

## Ian Ward

---

**From:** James Meyer <james.meyer@suffolkwildlifetrust.org>  
**Sent:** 02 August 2017 16:56  
**To:** Ian Ward  
**Subject:** RE: Proposed condition re-Debenham - MSDC 0030/17.

Hi Ian,

I've made a couple of small suggested amendments in red (and added 'potential' in front of 'harm'!) to the condition proposed to secure protected species mitigation measures should permission be granted:

Concurrently with the submission for approval of the first reserved matters, a detailed strategy for the mitigation of any potential harm to bats, reptiles, otters and water voles and the enhancement of the site for wildlife shall be submitted to and approved in writing by the local planning authority. The strategy must be based upon up to date ecological survey information. Thereafter the strategy shall be implemented entirely as approved.

*Reason: To safeguard the biodiversity interest.*

As also discussed (and covered in our consultation response) it does appear that the proposed development will result in the loss of most of the small area of woodland in the north of the site. This would potentially result in a net loss to biodiversity in the area and we therefore consider that it should be judged against national and local planning policy as part of the determination.

If you have any further queries please let me know.

Kind regards

James

**James Meyer**  
**Senior Conservation Planner**

**From:** Ian Ward [mailto:[ian.Ward@baberghmidsuffolk.gov.uk](mailto:ian.Ward@baberghmidsuffolk.gov.uk)]  
**Sent:** 02 August 2017 12:19  
**To:** James Meyer <james.meyer@suffolkwildlifetrust.org>  
**Subject:** Proposed condition re-Debenham - MSDC 0030/17.

James,

Will the condition below cover your outstanding concerns?

Concurrently with the submission for approval of the first reserved matters, a detailed strategy for the mitigation of any harm to bats, reptiles, otters and water voles shall be submitted to and approved in writing by the local planning authority. Thereafter the strategy shall be implemented entirely as approved.

*Reason: To safeguard the biodiversity interest.*

Regards,

Ian Ward Dip EP MRTPI  
Senior Development Management Officer - Development Management  
**Babergh and Mid Suffolk District Councils - Working Together**



Ian Ward  
Planning Department  
Mid Suffolk District Council  
131 High Street  
Needham Market  
IP6 8DL

Suffolk Wildlife Trust  
Brooke House  
Ashbocking  
Ipswich  
IP6 9JY

01473 890089  
Info@suffolkwildlifetrust.org  
suffolkwildlifetrust.org

21<sup>st</sup> July 2017

Dear Ian,

**RE: 0030/17 Outline Planning Permission sought for the erection of up to 25 dwellings. Formation of vehicular access to Little London Hill (revised proposal). Land bounded by Derry Brook Lane and Little London Hill, Debenham**

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

We note that an updated site layout plan has been submitted and the proposed number of houses has been reduced, allowing a greater area of green space. However, the comments noted in our letter dated 8<sup>th</sup> February 2017 do not appear to have been addressed and still apply to this application.

Based on the information provided, we consider that this application still fails to demonstrate that the proposed development will not result in an adverse impact on UK and Suffolk Priority habitats (lowland mixed deciduous woodland and hedgerow) and protected and UK and Suffolk Priority species (reptiles; otter and water vole). In the absence of demonstration that such impacts can be avoided; mitigated or adequately compensated, this application should be refused.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

Jill Crighton  
Conservation Planner

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guarantee no 695346  
Registered charity no 262777





Stuart McAdam  
Planning Department  
Mid Suffolk District Council  
131 High Street  
Needham Market  
IP6 8DL

Suffolk Wildlife Trust  
Brooke House  
Ashbocking  
Ipswich  
IP6 9JY

01473 890089  
info@suffolkwildlifetrust.org  
suffolkwildlifetrust.org

08/02/2017

Dear Stuart,

**RE: 0030/17 Outline Planning Permission sought for the erection of up to 34 dwellings. Formation of vehicular access to Little London Hill. Land bounded by Derry Brook Lane and Little London Hill, Debenham**

Thank you for sending us details of this application. We have read the ecological survey reports (Mill House Ecology, both July 2016) and we note the findings of the consultant. To re-iterate our comments from our letter dated 11 August 2016 in response to application reference 2910/16, we have the following comments on this proposal:

#### **UK and Suffolk Priority Habitats**

The site includes the UK and Suffolk Priority habitats lowland mixed deciduous woodland and hedgerow. It appears that the proposed development will result in the uncompensated loss of these habitats present within the site. The National Planning Policy Framework (NPPF) (section 1.18) and Mid Suffolk DC's adopted Core Strategy document (policy CS5) seek to ensure that all development maintains and enhances the environment, including protecting Priority habitats and species. Consent should therefore not be granted for any development which would result in the uncompensated loss of Priority habitats.

#### **Protected and UK and Suffolk Priority Species**

##### Reptiles

We note that the reptile surveys have recorded that the site supports a 'Good' population of slow worm and a 'Low' population of grass snake and that two different potential mitigation strategies are proposed; these are either the retention of animals in suitable habitat on site or translocation to a suitable offsite receptor area. However, the information contained within the application does not appear to include the selection of a mitigation option and it is therefore unclear how the proposed development will avoid having an adverse impact on the reptile populations present on the site. We recommend that, prior to the determination of this application, further information is provide on an appropriate reptile mitigation strategy.

Reptiles are protected from killing and injury under the Wildlife and Countryside Act (1981) (as amended) and as such are a material consideration in any planning application.

##### Bats

Survey of the site has identified that four trees (T1 to T4) contain features suitable for roosting bats, the ecological survey report recommends that these are retained and that if this is not possible further bat surveys must be undertaken. Although the Proposed Site Layout Plan drawing appears to show these trees

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retained, their locations on the plan do not exactly match those of trees T1 to T4 shown in the ecological survey report. We therefore recommend that clarification is sought that these trees are proposed for retention and will be suitably protected from any adverse impacts.

All bat species and their roosts are fully protected by legislation (Wildlife and Countryside Act (1981) (as amended) and The Conservation of Habitats and Species Regulations (2010) (as amended)). The combined legislation makes it illegal to deliberately kill, injure or capture (take) bats, deliberately or recklessly disturb bats (whether in a roost or not) or damage, destroy or obstruct access to bat roosts. Natural England, as the Statutory Nature Conservation Organisation (SNCO) for England, has to be notified when a proposed development will affect a bat roost.

#### Otter

The ecological survey report recorded an otter holt/resting place on site and includes recommendations for protecting this area from disturbance. However, these recommendations do not appear to have been incorporated in to the design of the site shown on the Proposed Site Layout Plan drawing. As these measures are required to prevent an adverse impact on this species it is essential that they are included as part of any proposed development.

Otter are protected by the Wildlife and Countryside Act (1981) (as amended) and the Conservation of Habitats and Species Regulations (2010) (as amended). It is offence to intentionally kill, injure or trap an otter or be in possession of a live or dead otter or any part of one or intentionally damage, destroy or obstruct access or disturb any otter shelter or animal while occupying such shelter.

#### Water Vole

The ecological survey report recorded possible evidence of water vole on the site, although it concluded that the habitat was sub-optimal for this species. It is noted that the land adjacent to river (on the southern boundary of the site) is proposed as public open space, dependent on the use and management of this area this could result in an adverse impact on water vole if they are present. We therefore recommend that the further water vole survey identified in the report is undertaken to fully inform the assessment of likely impacts on this species.

Water vole are protected by the Wildlife and Countryside Act (1981) (as amended). It is an offence to intentionally kill, injure or take a water vole; possess or control a live or dead water vole; intentionally damage, destroy or obstruct access to any structure or place which water voles use for shelter or protection, or disturb water voles using such a place.

#### Nesting Birds

The proposed development would involve the loss of both trees and hedgerows which provide habitat for nesting birds, likely including some UK and Suffolk Priority species. The ecological survey report includes recommendations for planting to help compensate for this loss, however from the plans provided it is unclear how this will be implemented given the level of development proposed.

#### **Lighting**

Based on the information provided, the site of the proposed development appears likely to be used by nocturnal species such as bats. The ecological survey report accompanying the application includes recommendations for a sensitive lighting strategy to mitigate for such impacts. Notwithstanding the above comments, should it be determined that some level of development is acceptable at this site, such a strategy must be implemented in the site design.

#### **Conclusion**

Based on the information provided, we consider that this application fails to demonstrate that the proposed development will not result in an adverse impact on UK and Suffolk Priority habitats (lowland mixed deciduous woodland and hedgerow) and protected UK and Suffolk Priority species (reptiles; otter and water vole). In the absence of demonstration that such impacts can be avoided; mitigated or adequately compensated, this application should be refused.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

James Meyer  
Conservation Planner

**Planning application 0030/17- July 2017** Land bounded by Derry Brook Lane and Little London Hill- Outline planning permission sought for the erection of up to 25 dwellings. Formation of vehicular access to Little London Hill (revised proposal).

The Debenham Parish Council would like to recommend the refusal of this planning application due to the following issues raised at the Parish Council meeting held on Monday 17<sup>th</sup> July 2017:

- a) The proposed access to the development (Little London Hill) is extremely unsuitable and the improvement measures suggested by the applicant would not be appropriate or sufficient to mitigate it. Little London Hill is a very narrow country lane culminating in a congested four way junction
- b) The layout of the roads in this area means that whenever a heavy goods vehicle needs to get through (which happens several times a day) all other traffic stands to a halt.
- c) The traffic increase which would result from a possible additional 50/60 vehicles could cause considerable disruption in an area which is already highly problematic.
- d) Throughout the village there is already cause for concern when it comes to traffic flow and parking and a marked increase in the overall number of vehicles would only further exacerbate this.
- e) This development is very close to the local primary school, where traffic and parking has been a problem for a number of years and still is. This could easily become an almost unmanageable situation with the proposed changes in traffic restriction legislation and traffic restriction enforcement planned for 2019.
- f) The proximity to the primary school increases the health and safety risks for drivers and pedestrians in an area already congested. This would be even more of an issue during the construction period. The school building also houses the pre-school and the Debenham Library, therefore the influx of traffic on this lane is even higher than the expected associated with such a facility.
- g) There are also six new properties on the same junction which will already exacerbate the highways issues. The plans currently associated with this planning application do not include the new properties, therefore are not a true representation of the site and do not illustrate how it will potentially affect neighbouring properties.
- h) There are other sites in the village which are better suited for this type / size of development.
- i) There is no footway on Little London Hill going towards the junction and there is no room for one either, therefore additional suggestions should be made with regards to pedestrian links being added to the proposals.
- j) The current lack of infrastructure would be further negatively affected and the local education and health provisions are already full to capacity.
- k) The flood risk in this area is extremely high and further development would only make this worse and place the existing properties at higher risk.
- l) Due to the no. of dwelling being proposed, there is a risk of serious interference with the drainage systems.
- m) The developer does not seem to be able to offer a solution for the issues relating to threats to wildlife.

The planning policies taken into account by the Debenham Parish Council are as follows:

Gp1- design and layout of development  
Nppf- national planning policy framework  
Cl8- protecting wildlife habitats  
Sc4- protection of ground water supplies  
Cor5- mid Suffolk's environment  
Cor1- settlement hierarchy  
Cor2-cs2- development in the countryside and countryside villages  
Csfr-fc1- presumption in favour of sustainable development  
Cor6- services and infrastructure  
H15- development to reflect local characteristics  
H16- protecting existing residential amenity  
H4- proportion of affordable housing in new housing development  
H7 restricting housing development  
H13- design and layout of housing development  
T9- parking standards  
T10- highway considerations in development

Dina Bedwell  
Parish Clerk and Responsible Financial Officer  
Debenham Parish Council

**MID SUFFOLK DISTRICT COUNCIL**

**MEMORANDUM**

TO: Ian Ward – Senior Planning officer  
From: Julie Abbey-Taylor, Professional Lead – Housing Enabling  
Date: 31.07.2017

**SUBJECT: - Application Reference: M/0030/17/OUT – revised proposal 7.7.17**

Proposal: Application for Outline Planning permission for 25 dwellings with associated road access, parking and landscaping and formation of vehicular accesses.

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**Key Points**

**1. Background Information**

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|---|
| A development proposal for twenty-five (25) residential dwellings |
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| This is an open market development and should provide nine (9) affordable housing units which = 35%. |
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**2. Housing Need Information:**

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing. A new SHMA is currently being written but outcomes are not available at the time of this consultation.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **97 new affordable homes per annum. Ref1**

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

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

properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses. Although this is not their first preference, many accept that the private rented sector is their most realistic option.

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

#### 4. Preferred mix for Affordable Housing

4.1 The most recent information from the Mid Suffolk's Council's Housing Register shows 16 applicants registered who have a connection to Debenham.

4.2 9 of the proposed dwellings on the development would be for affordable housing and are indicated by the addition of a red dot on the layout plan to show their location.

These have been offered the form of: -

Rented: -

- 2 x 1-bedroom 2-person flats at 51 square metres – as required
- 4 x 2-bedroom 4-person houses at 72.9 square metres – the units shown **should be 79 sqm to comply with Housing Technical space standards 2015**
- 1 x 3 bed 5-person houses @ 89.1 sqm – **the Technical Housing standards 2015 states that this size dwelling should be 93 sqm.**

Shared Ownership: -

- 1 x 2 bed 4-person houses @ 72.9 sqm - **Should be 79 sqm to comply with Housing Technical space standards 2015**
- 2 x 3 bed 5-person houses @ 89.1 sqm – **should be 93 sqm as above.**

**The above mix is requested at the space standards I have included to be incorporated in the S106 agreement.**

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

- Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards
- The council is granted 100% nomination rights to all the affordable units in perpetuity and transferred freehold to one of the Council's preferred Registered Providers.

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Hollow Road  
Bury St Edmunds  
IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Mid Suffolk District Council  
131 High Street  
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Our Ref: 0030\_17  
Date: 17 February 2017

For the Attention of Ian Ward

Dear Mr Isbell

**Planning Application 0030/17 – Site fronting The Butts and Little London Lane, Debenham: Archaeology**

The proposed development area lies on a south facing slope, overlooking the historic settlement of Debenham (DBN 131), and is topographically favourable for early occupation. The site has not been systematically evaluated for archaeological remains. This work could be secured through a condition on planning consent.

However, a World War II operations base is also recorded in the site (DBN 142), with information available in the County Historic Environment Record. The applicant should assess this feature and the impacts of development on it, and present any proposals for how it will be managed.

**Subject to clarification of this matter prior to determination of the application**, there would be no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important archaeological heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), 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, used together, 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 Condition 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 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 (2012).*

**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.*

In this case, a trenched archaeological evaluation will be required in order to establish the archaeological potential of the site. Decisions on the need for any further investigation, i.e. excavation before any groundworks commence and/or monitoring during groundworks, will be made on the basis of the results of the evaluation.

I would be pleased to offer guidance on the archaeological work required and will, on request of the applicant, provide a brief for each stage of the archaeological investigation (Please see our website for further information on procedures and costs:

<http://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/>

Yours sincerely

Rachael Abraham

Senior Archaeological Officer  
Conservation Team