

## Mid Suffolk District Council

### Debenham Neighbourhood Development Plan

### Reg 16 Submission Consultation Responses



During May / June 2018 Debenham Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Mid Suffolk District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Monday 2 July 2018 until Friday 24 August 2018.

Written representations on the Plan were received from eight organisations / individuals. These are listed below, and copies of their representation(s) are attached.

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## D1 Suffolk County Council

Date: 22 August 2018  
Enquiries to: Cameron Clow  
Tel: [REDACTED]  
Email: [REDACTED]



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

Dear Mr Hobbs,

### **Submission version of the Debenham Neighbourhood Plan**

Thank you for consulting Suffolk County Council on the Submission version of the Debenham Neighbourhood Plan.

The County Council is not a plan making authority, except for minerals and waste. However, county councils have fundamental roles within the planning system including:

- Archaeology
- Education
- Fire and Rescue
- Flooding
- Minerals and Waste
- Natural Environment
- Rights of Way
- Transport

This response, as with all those comments which the County Council makes on emerging planning policies and allocations, will focus on matters relating to those services.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to met to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are (Note that b and c only apply to Neighbourhood Development Orders):

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan)
- b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.
- c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.
- d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX  
[www.suffolk.gov.uk](http://www.suffolk.gov.uk)

e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

f) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan)

More information on the basic conditions should be found here:

<https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

Any reference to the National Planning Policy Framework (NPPF) in this response refers to the previous version of the NPPF. This is because for the examination plans, submitted on or before the 24th of January 2019 are to be assessed under the previous NPPF.

### Archaeology

Consideration has been given to heritage within the village, which is welcome, however some modifications to text and policies would ensure that archaeological (below ground) heritage assets are also fully considered in the plan.

#### *Allocated Sites*

The County Council recommend the following amendments to site policies in order that they align to paragraph 126 of the NPPF by setting out a “positive strategy for the conservation and enjoyment of the historic environment” and in doing so meet basic condition “a” (having regard to national policies and advice contained in guidance issued by the Secretary of State).

#### *DEB 04*

This site lies in an area of high topographic potential for archaeological remains, overlooking the confluence of the River Deben and one of its tributaries. A scatter of medieval artefacts is recorded to the north east (DBN 032), and medieval, roman, saxon and prehistoric finds and features to the north west (DBN 087, DBN 104, DBN 110), with prehistoric, saxon and roman scatters to the east (WNT 016, 017). Archaeological field evaluation will be required at an appropriate design stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. In this case, geophysical survey in the first instance will inform the extent and timing of trial trenching.

It is recommended that the policy states that any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

#### *DEB 05*

This site, overlooking a tributary of the River Deben, is a site that is topographically favourable for archaeological remains. A scatter of 13th-14th century pottery is recorded from within the site (DBN 052), possibly indicative of settlement. Further scatters of medieval, late saxon and prehistoric finds are recorded to the north (DBN 040, 051, 053). Archaeological field evaluation will be required at an appropriate design stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. In this case, geophysical survey in the first instance will inform the extent and timing of trial trenching.

It is recommended that the policy states that any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

#### *DEB 03*

Policy DEB 3 is in an area of potential above a tributary of the river, and opposite finds of Roman, Saxon and Prehistoric date.

It is recommended that the explanatory text related to the policy states that early evaluation would be advisable and best practice.

#### Education

As drafted the Plan does not take account of the education impacts which arise due to the allocated sites within the Plan. As a result the plan does not meet basic condition “d”, contributing to the achievement of sustainable development.

#### *Community Action E1*

This action should refer to the County Council, as the responsible organisation to collect the required developer contributions (S106 or CIL) and to deliver education infrastructure.

#### *Early Years*

Debenham Parish is part of Debenham Ward, which currently has a deficit of 15 early years places and the development proposed in the plan would generate approximately 32 children requiring early years places. There are two providers in the ward, Debenham Roundabout Pre-School and Sir Robert Hitcham Primary Nursery.

There is an opportunity for the plan to include provision for a new early years setting, potentially on one of the housing sites within the plan. The level of growth proposed could justify the provision of a new setting and would provide additional choice and resilience to early years provision within the village. However, additional capacity could be provided alongside potential expansion of the primary school (see Primary School section below).

As the sites are presently configured providers would not be able to expand on their current setting and so the County Council would recommend allocating land for early years provision within the plan. There is sufficient growth in the Plan to require a new early years facility to mitigate the impact.

The County Council recommends the plan allocates a site for early years provision. This would require 0.1 hectares of land and it is recommended that the plan allocate this in order to meet basic condition “d”( contributing to sustainable development). This could be part of one of the sites allocated within the Plan which could be achieved by a modification to the site policy.

#### *Primary School*

The current forecast for the local primary school, Sir Robert Hitcham’s CEVAP, is presented below.

| <b>Sir Robert Hitcham’s CEVAP, Debenham</b> |                     |             |             |             |             |             |
|---|---------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Permanent Capacity</b>                   | <b>95% capacity</b> | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| 210   | 200                 | 181         | 176         | 170         | 158         | 148         |



The allocated sites and windfall in the plan would generate an estimated 79 primary school pupils and in order to accommodate this the school will need to expand from a 210 place school to a 315 place school. No feasibility work has taken place, however, discussion with the school has been undertaken to consider the practicalities involved in the options around expansion, the school is willing to work with Suffolk County Council in exploring these. Expanding the school (to 315 places for example) within its current site could remain within government guidance (Building Bulletin 103) on site area. Whilst possible, the impact (e.g. traffic, ecological and landscape) would need to be assessed but there is a fundamental question of whether its current location maximises the potential for use of sustainable transport modes into the future. These discussions would need to take place in order to determine whether the primary school could accept the growth proposed.

### *Secondary School*

The current forecast for the local secondary school, Debenham High is presented below.

| <b>Debenham High</b>      |                     |             |             |             |             |             |
|---------------------------|---------------------|-------------|-------------|-------------|-------------|-------------|
| <b>Permanent Capacity</b> | <b>95% capacity</b> | <b>2018</b> | <b>2019</b> | <b>2020</b> | <b>2021</b> | <b>2022</b> |
| 720                       | 684                 | 670         | 667         | 654         | 644         | 636         |

Since the previous consultation, the County Council has learned that Debenham High School has a capacity of 720, rather than the previously stated 654. As the school is an academy it is able to make modifications to facilities without informing the County Council, which is why this was not known at the previous stage of consultation. The growth of 316 homes proposed in the Neighbourhood Plan would generate an estimated 57 pupils, taking the school above the 95% capacity by 2022. However, this can be accommodated by internal reconfiguration of the school. Following the previous Neighbourhood Plan consultation work was undertaken to identify ways the school could further expand. Internal reconfiguration was an option identified that could take the school up to 810 places without additional land. This would be funded by development through the Community Infrastructure Levy. Therefore the school has the ability to cope with the Neighbourhood Plan growth proposed without the additional land requested at the previous stage of consultation.

It should be noted that this is not the optimum solution, as the school still requires use of the leisure centre for physical education and parking. It is the County Councils understanding that this is an informal agreement, and would recommend formalising it in order to ensure the school retains parking and sports facilities. Particularly as further growth within the catchment of the high school could mean the school needs to expand further to a 945 place school. Additional land would also be required in this situation in order to provide additional outdoor sports facilities, such as a running track or the re-provision of existing courts through a multi use games area.

### Flooding and Water Management

The plan identifies that there are flood issues within Debenham and includes details regarding the Natural Flood Management schemes on water courses that affect Debenham, which is welcome.

As well as the river flooding (fluvial) that takes place in the village, the plan should also identify the surface water (pluvial) flood risk in order to meet basic condition “d”. This can be added to explanatory text and there are maps describing surface water flooding available from the flood warning information website: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>.

Some additions to explanatory text, clearly pointing towards local policy, national policy and national guidance would make it clearer that the plan is conforming to the basic conditions in regards to flooding and water management.

NPPF paragraphs 99 and 100 set out how local policy should address flood risk and references to these paragraphs should be included. The local policy to refer to is the Flood Risk Management Strategy produced by the Flood Risk Management Partnership and Policy CS 4 of the Mid Suffolk Core Strategy. Paragraph 7.3 would seem to be a logical place to refer to insert these policy references.

The reference to the sequential test, Sustainable Drainage Systems (SuDS) and aim to reduce runoff rates (i.e. betterment) is welcome. In order for the SuDS section to be complete and to comply with basic condition “a”, there should be reference to the hierarchy of SuDS and that development should aim as high up this hierarchy as possible.

The submission version of the plan includes provision for windfall housing, which was not included in the previous version of the plan. Because of this and the complex flood issues within Debenham, the County Council would recommend a specific flood policy within the plan to address these issues and to comply with basic condition “d”. The policy should direct development away from the areas of highest flood risk and make reference to the number of projects currently contributing to reducing flood risk within the parish. Due to the mix of flood risk responsibilities within the area, the County Council (the Lead Local Flood Authority and responsible for surface water flooding) has liaised with the Environment Agency (responsible for flooding from rivers and the sea) in order to produce the following policy.

It is recommended the following is inserted into the supporting text:

“Due to the predicted and historic flood risk within Debenham, because of the meeting of three watercourses, unfavourable geology for infiltration of surface water and the topographical nature of the parish, development will be expected avoid areas of the highest flood risk, in line with the sequential test and to address the issues of flood risk in a way that provides betterment within site boundaries. It is highly recommended that developers gain pre application advise on flood risk and surface water drainage from the Suffolk County Council as the lead Local Flood Authority and that developers have regard for the Suffolk Risk Management Strategy, including the appendices that include specific guidance on SuDS and consenting. The Flood Risk Management Strategy and Appendices can be found on the Green Suffolk website: <http://www.greensuffolk.org/about/SFRMP/>”

It is recommended the following is included in the plan as policy

“Development should:

- a) Avoid the highest area of fluvial and pluvial flood risks.
- b) Where appropriate, create betterment of surface water drainage within the development boundary”

#### *Site DEB4*

The County Council would also like to highlight that the allocation south of Low Road (policy DEB4) Contains an area of flood zone 3 along the edge of the site adjacent to Low Road. Reference to this should be made in policy DEB4 and require that development takes account of this in order to comply with condition “d”.

#### Rights of Way (PRoW)

There are currently no references to PRoW within the plan. Policy DEB12 – Non-motorised networks should be amended to comply with basic condition “a”. Paragraph 75 of the NPPF, states “Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.” The following amendment is suggested:

“Existing Public Rights of Way provide a high level of amenity value and will be protected. New developments should take opportunities to improve and increase links where possible.”

As well as having greater regard to national policy, referencing PRow will protect more of the network than is protected in the current policy wording. In addition to footpaths and bridle ways, the PRow network also has another two categories: restricted byways and byways open to all traffic. Referring to the PRow network more widely will also protect these types of route.

### Transport

#### *Policy DEB9*

This policy goes beyond the Suffolk Guidance for Parking (2015), which has been adopted by Babergh and Mid Suffolk District Councils. While discussion with the Parish Council made it clear they wish to include higher parking requirements for residential developments within the plan, there should be evidence to justify these different minimum requirements.

Additionally, Suffolk Parking Guidance includes more comprehensive guidance for other types of development and vehicle types (including bicycles and electric vehicles). It is recommended that the plan includes reference to the Suffolk Parking Guidance (2015), for non-residential development and other vehicle types..

### General Comments

#### *Policy DEB 5*

This policy does not specify the site number, like other site allocation policies do. To ensure that the policy is specific about which site it is allocating it should add the site number to the policy as shown on map 4.

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I hope that these comments are helpful. The County Council is always willing to discuss issues or queries you may have.

If there is anything I have raised you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

John Pitchford BA(Hons) DipTP DMS MRTPI  
Head of Planning  
Suffolk County Council

[ - Ends - ]

## D2 Environment Agency



**Our ref:** AE/2018/122604/02-L01

**Your ref:** NHP

**Date:** 20 July 2018

Dear Mrs Bedwell

**DEBENHAM NEIGHBOURHOOD PLAN 2016-2036  
REGULATION 16 GRACECHURCH STREET DEBENHAM STOWMARKET  
SUFFOLK IP14 6BL**

Thank you for your letter dated 28 June 2018 relating to the Debenham Neighbourhood Plan. We have assessed the draft Neighbourhood Plan as submitted and our letter contains our response and information in relation to environmental issues that should be considered during the development of the Neighbourhood Plan.

Our principal aims are to protect and improve the environment, and to promote sustainable development, we:

- Act to reduce climate change and its consequences
- Protect and improve water, land and air
- Work with people and communities to create better places
- Work with businesses and other organisations to use resources wisely

You may find the following two documents useful. They explain our role in the planning process in more detail and describe how we work with others; they provide:

- An overview of our role in development and when you should contact us.
- Initial advice on how to manage the environmental impact and opportunities of development.
- Signposting to further information which will help you with development.
- Links to the consents and permits you or developers may need from us.

Building a better environment: Our role in development and how we can help:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/289894/LIT\\_274\\_5\\_c8ed3d.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289894/LIT_274_5_c8ed3d.pdf)

Environmental Quality in Spatial Planning: <http://www.english-heritage.org.uk/publications/environmental-quality-in-spatial-planning-supplementary-files/>

Environment Agency  
Cobham Road, Ipswich, Suffolk, IP3 9JD.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

## **Flood Risk**

All future development proposals within the Fluvial Flood Zone of the River Deben (which includes Flood Zones 2 and 3, as defined by us) shown on the Policies Map, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment (FRA).

## **Natural Flood Management**

We are pleased to see that section 7 explores Natural Flood Management. There has been a lot of work undertaken. Further NFM projects upstream of Debenham will help reduce flood risk to the village and so there is an opportunity for housing developers to be involved with this project and to be part of a high profile NFM project that is reducing flood risk to the village as well as delivering multiple environmental benefits.

We encourage continued funding for the flood defence it is providing through 'slow the flow' and the environmental benefits that are outlined in section 7. In Policy 17- Landscaping, this could be included as part of the policy and further inclusion in the Neighbourhood Plan. Objectives could be used to create an outcome that improves and enhances Natural Flood Management. This would also encourage developers to use Natural Flood Management in their development designs.

## **Sequential Approach**

The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk, section 7.3 recognises the need for the sequential test. However the Neighbourhood plan states it should be applied to Flood Risk Assessments (FRA) but should in fact be applied before a FRA is produced to ensure that development is appropriate. If it isn't possible to locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is at high risk (Flood Zone 3), a FRA should then assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.

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

An environmental permit for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert.

Application forms and further information can be found at: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Anyone carrying out these activities without a permit where one is required, is breaking the law. The Local Plan should consider this when allocating development sites adjacent to a 'main river'. A permit may be required and restrictions imposed upon the work as a result in order to ensure the development does not have a detrimental impact upon the environment and flood risk.

## **Contaminated Land**

For land that may have been affected by contamination as a result of its previous use or that of the surrounding land, sufficient information should be provided with any planning application to satisfy the requirements of the NPPF for dealing with land contamination. This should take the form of a Preliminary Risk Assessment (including a desk study, conceptual model and initial assessment of risk), and provide assurance that the risk to the water environment is fully understood and can be addressed through appropriate measures. This is because Debenham is a source protection zone 3 as well as on a principal Aquifer. For any planning application the prior use should be checked to ensure there is no risk of contamination for high or medium contaminating previous uses.

Please note that the view expressed in this letter are a response to the proposed Neighbourhood Development Plan only and does not represent our final view in relation to any future planning or permit applications that may come forward. We reserve the right to change our position in relation to any such application.

Please contact me on the details below should you have any questions or would wish to contact any of our specialist advisors. Please continue to keep us advised on the progress of the plan.

We trust this advice is helpful.

Yours sincerely

**Miss Natalie Kermath**  
**Planning Advisor**

*[ - Ends - ]*

## D3 Natural England

Date: 20 July 2018  
Our ref: 250892



Babergh & Mid Suffolk District Council

communityplanning@baberghmidsuffolk.gov.uk

**BY EMAIL ONLY**

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Sir/Madam

### **Debenham Neighbourhood Plan**

Thank you for your consultation on the above dated 28 June 2018.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact:

[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully  
Dawn Kinrade  
Consultations Team

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](http://magic.defra.gov.uk)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>4</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park or Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk)<sup>5</sup> website and also from the [LandIS website](http://www.landis.org.uk)<sup>6</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>8</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

1. <http://magic.defra.gov.uk>

2. <http://www.nbn-nfbr.org.uk/nfbr.php>

3. <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

4. <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

5. <http://magic.defra.gov.uk/>

6. <http://www.landis.org.uk/index.cfm>

7. <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

8. <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>



## Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

9. <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>
10. <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>
11. <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>
12. <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>
13. <http://publications.naturalengland.org.uk/publication/35012>

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)<sup>14</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

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14. <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

[ - Ends - ]

## D4 Historic England



Historic England

By e-mail to:  
Paul Bryant  
Babergh and Mid Suffolk District Councils

Our ref: PL00299642  
Your ref: 17/08/2018  
Date: 01223 582746  
Direct Dial: 07833 718273  
Mobile:

Dear Paul,

### Ref: Debenham Neighbourhood Plan Regulation 16 Consultation

Thank you for your correspondence dated 28 June 2018 inviting Historic England to comment on the Regulation 16 Submission version of the Debenham Neighbourhood Plan.

We welcome the production of this neighbourhood plan, and are pleased to note that the historic environment of the parish is referred to throughout, with a strong emphasis on the conservation of the historic environment found in the supporting text and Policies DEB 20-21. We would recommend that the heading of Policy DEB 21 is altered to read 'Historic Environment' rather than Conservation, to reflect the terminology found in national planning policy.

Aside from congratulating those involved, we do not wish to provide any further comments at this time. We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

I would be grateful if you would notify me if and when the Neighbourhood Plan is made by the district council. 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.

Please do contact me, either via email or the number above, if you have any queries

Edward James  
Historic Places Advisor, East of England



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.  
Correspondence or information which you send us may therefore become publicly available.



## D5 Voller

*[MSDC Note: The majority of comments below relate to our SHELAA site no SS0364 - Land west of Priory Lane, Debenham]*

### Received by e-mail on 22 Aug 2018

We would like to highlight to the examiner some key issues concerning our site with regards to what is currently proposed in the Debenham Neighbourhood Plan:

- How it meets strategic objectives consistent with national policy and guidance.
- How decisions conform to the policies of the plan.
- Whether the evidence for decisions are sound and impartial.

Planning Practice Guidance for preparing neighbourhood plans states:

*'proportionate, **robust** evidence should support the choices made and approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...'*

Both assessments forming the evidence of chosen 'suitable' sites are incorrect with regards to access details of site SS0364. There has been no independent assessment of this site, either by AECOM or the Draft SHEELA, based on correct details.

In response to a request for a re-assessment of the site, the independent assessor, AECOM has suggested that, 'the PC will have to take a view on the validity' of the incorrect details and the impact it would have.

The PC have not acted impartially with regards to this site and have made any discussion in relation to the plan extremely challenging.

The site conforms to many of the policies in the Debenham Neighbourhood Plan and meets strategic objectives consistent with national policy and guidance, yet because access to the site has been inaccurately assessed, the many benefits of developing this site and providing the type of housing that the community have requested has currently been forfeited.

The PC's response in submitting the Plan with incorrect facts, suggests that the Neighbourhood Plan holds no weight to future possible development of this site. We would disagree and suggest that a twenty year plan that has been seen by the public to have gone through due process to be approved, would by most become the consensus.

Sanctuary Housing, occupies part of the site that was previously sold to them in the 1970's and extended in the 1980's. The organisation would be keen to extend their sheltered housing at Coopersfield. They have many enquiries which they are unable to accommodate. They would wish to see the site featured in the Debenham Neighbourhood Plan as suitable; offering solutions to the lack of specific type of housing they can offer, for which there is a shortage in the village and surrounding area.

Whilst the PC remain unwilling to include the significant facts that would change the assessment of this site, the potential to meet the wishes of 95% of the community, to provide more housing for the elderly and young family housing provision within the village, now, is significantly reduced. Any other suitable site development in the village as selected in the Debenham Neighbourhood Plan cannot guarantee they will meet this specific wish of the community.

As it stands, the plan deliberately misrepresents the site and its suitability for any development in accordance to the objectives and policies that The Debenham Neighbourhood Plan should conform to.

A development of this site along the lines outlined, is supported by the following Development Plan Policies;

#### **DEB 1 (Policy 1 – Growth)**

Development of site SS0364 would be a relatively small infill area, available now and able to increase the number of dwellings in Debenham fulfilling the overall requirement of housing in the District.

#### **DEB 2 (Policy 2 - Appropriate Housing)**

Development of site SS0364 would be a small development, infrastructure already exists and services are available via legal agreement. The site is large enough to have sufficient buffers to avoid hard edges. Site SS0364 has an additional access that could be specifically used for mobility scooters etc and the existing access via Coopersfield is less than 300 metres from the Primary School gates, with good pedestrian access. Any development of site SS0364 would not affect the street scene. It is difficult to quantify 'good quality design,' by assumption any development would incorporate this. The amenity value on neighbouring properties would hardly change as the whole site would continue to have areas which remain the same. Similar design to that which the site links to would be achievable.

#### **DEB 3, 4 and 5**

These sites were allocated for development based on the independent experts AECOM assessment.

Site SS0364 has failed to have a reassessment even though the details in the initial assessment were incorrect. There has been no independent assessment with correct details of Site SS0364, the plan continues to include a misleading analysis of this site despite producing evidence which would alter the results considerably.

AECOM's response to a re-assessment;

"we cannot unfortunately re-join the process in the event our report, which is a snapshot in time, and contains professional judgements made on the basis of information available at that time."

#### **DEB 6 (Policy 6 - Consultation with the Parish Council)**

As landowners we actively attempted to consult with the Parish Council yet were faced with no response for seven months and only at the point when the plan was in its final stage, having reiterated and produced evidence of our wish to discuss the site, were we given an opportunity by the PC to listen to our comments.

The PC without our knowledge sent an inaccurate report from Suffolk County Council Highways with our re-assessment challenge. The report purely concentrated on a secondary access and Highways have since told us that the main access was not mentioned to them. Informally the highways engineer looked at the main access and although mentioned that what has gone before cannot be guaranteed to be acceptable now, it did seem to him a possibility that an extension to Coopersfield using the main access would be possible.

The village appraisal states:

- 77% of respondents supported small scale dispersed developments.
- 91% wanted small homes for rent.
- 93% wanted small homes for sale.

- 95% wanted homes for the elderly.

Therefore the upgrade to a through road for a possible expansion of Coopersfield could be considered as 'likely' and would accomplish what has been desired by much of the community.

**DEB 7 (Policy 7 - Sustainability)**

Any development of Site SS0364 will be designed to meet this policy.

**DEB 8 (Policy 8 - Housing Mix)**

Sanctuary Housing produce housing for a wide range of people; young people and elderly, offering a range of possible adaptations. The further development of Coopersfield by Sanctuary Housing would guarantee that any new development within this site would meet the wishes of 95% of the residents in Debenham.

**DEB 9 (Policy 9 – Residential Car Parking)**

Site SS0364 would be able to incorporate the required residential carparking, (higher than the national guidance).

**DEB 10 (Policy 10 – Lifetime Homes)**

Any development of Site SS0364 will be designed to meet this policy.

**DEB 11 (Policy 11 - Traffic flows and non-residential car parking)**

Site SS0364 is less than 400 metres from the village supermarket, Primary School and many other facilities.

**DEB 12 (Policy 12 – Non-motorised networks)**

Site SS0364 has an additional legitimate access and exit from the site via an unclassified highway for pedestrians, cycles, mobility scooters and the like.

**DEB 13 and DEB 14**

The development of site SS0364 as an extension to Coopersfield would undoubtedly create additional employment within the village.

**DEB 15 (Policy 15 – Broadband)**

Connect to existing infrastructure.

**DEB 17 (Policy 17 - Landscaping) DEB 18 (Policy 18 - Green Spaces)**

The site is large enough to have sufficient buffers to avoid hard edges. Over 400 new hedging plants have already been planted to ensure similar boundaries remain.

**DEB 21 (Policy 21 – Conservation)**

Site SS0364 is not in the conservation area, it is a self-regenerated piece of agricultural land. There has been no survey on the area and therefore any assessment is without evidence.

## **DEB 22 (Policy 22 – Views)**

Any development of Site SS0364 would not alter the views mentioned in paragraph 5.7. Information in the NP seems to have been altered since consultation, this change has not been publicly scrutinised and has no evidence to support its change.

## **DEB 23 (Policy 23 – Nature Conservation)**

Site SS0364 is not in the conservation area, it is a self-regenerated piece of agricultural land. There has been no survey on the area and therefore any assessment is without evidence.

Along with the fact that the site conforms to many of the Debenham Neighbourhood Plans policies for development, and the local need for the type of homes the site could offer, we feel that our communication with the PC from the start of the process has been made extremely challenging and their treatment of us has been unfair. Their expressed interest in owning the site as an extension to the cemetery has influenced how it has been knowingly, inaccurately incorporated into the submitted plan.

Below are details of the process we have been through:

As landowners we contacted the PC the day we were notified by MSDC that discussions would be taking place between landowners and the PC as part of the 'Call for Sites' asking to be part of any discussion of our site.

The PC made no contact with us.

We submitted our own consultation comments detailing the incorrect facts in the assessments.

By chance a few weeks later, we noticed the agenda for a coming meeting included: 'Recommendations to Full Council on Final NP submission,' we immediately questioned the PC as to why we had not been invited to discuss our site at any time in the process.

The PC Chairperson responded with:

"We have deliberately been consistent with all the land owners who promoted their sites in MSDC's call for sites exercise. If a land owner has approached us, then we have agreed to meet with them".

Only after producing evidence of the request, seven months prior, were we invited to a scheduled meeting where the NPC would find time to 'listen' to our comments.

Following this meeting, there was agreement that incorrect details should not be included as part of the plan, therefore the PC would seek a re-assessment by AECOM.

Having supplied our challenge in writing to the PC, for our reassurance we asked the PC on several occasions for a copy of all documents that were submitted to AECOM for the reassessment. After a 20 day wait for Freedom Of Information request we were given the documentation that had been sent to AECOM as part of our challenge.

Alongside our challenge and without our knowledge, the PC, had included a 'Highways' report focusing attention on any future development of this site, based purely on our secondary permitted access, along Priory Lane, however, the report made no mention of Highways thoughts about access from the High St, which was the main basis of the challenge.

The Suffolk County Council Highways report is inaccurate, for which 'Highways' have now apologised to us about and have also notified the PC. Having met with the Highways engineer, he stated that he was not asked to comment on the main access?

The request of such a report does not follow protocol, no planning application had been submitted. Though the large group of PC members had suggested to the Highways Engineer at site, that it was necessary due to the sites access issues and the link to the call for sites, the report omitted the main access to site and the contents were specifically customised.

In order to see the results of the re-assessment we were advised that we would need to request 'Freedom of Information'. After requesting again 20 days on and reminding the PC of our legal rights, 21 days from the request we received the response to the PC, from the independent assessor AECOM part of which states:

"all site assessment reports are a snapshot in time, and circumstances always change"

"in this case the Parish Council will have to, as a policy-making body, take a view yourselves on the validity or otherwise of the developer's contention."

The PC Meeting May 14<sup>th</sup> included in 'Chair's urgent business' a unanimous decision to confirm the original decision on site assessments. As:

"The resolution would not prevent the site from being developed in the future and any applications for development would be considered by the Planning Authority, the Parish Council and other relevant consultees on their merit at the time of submission".

This meeting was barely quorate and relied on a newly appointed Councillor to validate the vote.

There has been a concerted effort to push the Neighbourhood Plan through as quickly as possible, in reaction to a large scale planning application by Taylor Wimpey in another area of the village. This has affected other consultation comments and the way in which they have been dealt with.

The SS0364 site assessments which form the entire basis of suitable sites in the Neighbourhood Plan are incorrect and this was known at consultation stage.

The PC have been and are interested in owning this site, which prevents them from being impartial to decisions. (Evidence of this is available).

An adjacent neighbour to the piece of land (who is also on the Parish Council) had been very interested in acquiring this piece of land prior to our purchase. More details could be supplied if required.

The PC are adjacent neighbours to the site, both as owners or in their management of the land.

The Draft Plan has been changed since consultation, with no reference or evidence to why this change has been made, there are no consultation comments that request this change other than one which suggests that if views are considered to be valued there should be specific details as to why.

Ultimately, we feel that the Debenham Neighbourhood plan as submitted is knowingly incorrect with regard to our site. We request that the site should have an independent assessment with the correct access details and also focus on the possibility of an extension to Coopersfield. This would provide the small scale, small homes for the elderly that 95% of the local community have expressed their preference for.



A Neighbourhood Plan should be based on **robust** evidence. Failing this, it should include an explanation that more information has been received regarding site SS0364 since the site assessments were carried out and that the information received may considerably change the results of both assessments of the site.

*[ - Ends - ]*

## D6 Gladman Developments Ltd



Gladman House, Alexandria Way  
Congleton Business Park  
Congleton, Cheshire  
CW12 1LB

T: 01260 288800

F: 01260 288801

[www.gladman.co.uk](http://www.gladman.co.uk)

Mr Paul Bryant  
Spatial Planning Policy Team  
Babergh & Mid Suffolk District Council

By email only to: [communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

Dear Mr Bryant,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Debenham Neighbourhood Plan (DNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman requests to be added to the Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.

### Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the DNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

### National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans

should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

On the 24th July 2018, the government published a revised National Planning Policy Framework. The revised Framework states at paragraph 213 that 'the policies of the previous Framework will apply for the purposes of examining plans, where those plans are submitted on or before 24 January 2019.' As such the Parish Council will need to ensure that the policies contained within the DNP are consistent with the appropriate version of the NPPF. Further, the Parish Council will need to be aware that the revised NPPF is considered a material consideration which will need to be taken into account in dealing with any planning applications.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the previous Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 of the previous Framework further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the previous Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

### **Planning Practice Guidance**

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the DNP's ability to meet basic condition (a) and (d) and this will be discussed in greater detail throughout this response.

## **Relationship to Local Plan**

The development plan that covers the Debenham Neighbourhood Plan area and the development plan which the DNP will be tested against is the Mid Suffolk Core Strategy adopted in 2008 and the subsequent Core Strategy Focussed review which was undertaken and adopted by the Council in December 2012.

Mid Suffolk District Council are working with neighbouring authority Babergh District Council to produce a new Joint Local Plan, having consulted on the Issues and Options document in late 2017. The Parish Council should be mindful of this document as it emerges and draft the policies within the DNP should be worded as flexibly as possible to minimise any potential conflicts with the emerging Joint Local Plan. Otherwise, should conflicts arise policies in the DNP would be superseded by the Joint Local Plan as Section 38(5) of the Planning and Compulsory Purchase Act 2004 states:

*'if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).'*

Within the emerging Joint Local Plan it is proposed to reclassify Debenham as a Core Village. These are settlements that have access to several key services and facilities which are highlighted to take additional growth in the Joint Local Plan.

### **DEB1 (Policy 1 – Growth)**

Policy DEB1 states that the plan provides for up to 316 dwellings over the 2016 to 2036 plan period.

Gladman are concerned that the proposed housing requirements is not expressed as a 'minimum provision' and subsequently do not consider the policy to be in line with the requirements of the current and previous Framework(s). We suggest that the policy wording is amended to reflect that a minimum of 316 dwellings will be delivered over the plan period.

### **DEB18 (Policy 18 – Green Spaces)**

Policy DEB18 identifies a total of 14 tracts of land that are proposed as Local Green Space. The policy states that proposals for any new development on LGS will be resisted.

Gladman remind the Council that the previous Framework makes clear at Paragraph 76 that designation of land as LGS should be consistent with the local planning of sustainable development for the area. Paragraph 76 states that:

*'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.'*

Further guidance is provided at Paragraph 77 of the previous Framework, which sets out three tests that must be met for the designation of Local Green Spaces. Paragraph 77 states that:

*'The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:*

- Where the green space is in reasonably close proximity to the community it serves;*

- *Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and*
- *Where the green area concerned is local in character and is not an extensive tract of land.'*

Gladman do not believe that sufficient evidence to support the allocation of all 14 parcels of land has been provided and as such, we suggest that the Parish Council take the time to revisit the evidence base sitting behind the policy to ensure that it is considered sufficiently robust enough so as to support such a designation.

### **DEB 22 (Policy 22 – Views)**

Policy 22 identifies a number of views that are considered highly valued by the local community. The policy further goes on to suggest that development proposals seeks to protect these highly valued views.

Whilst Gladman note that some of the concerns we expressed regarding the views policy in our previous representation have been addressed, we are still concerned that the policy is inconsistent with the requirements of the Framework.

We submit that new development can often be located in areas without eroding the views considered to be important to the local community and can be appropriately designed to take into consideration the wider landscape features of a surrounding area to provide new vistas and views.

In addition, as set out in case law, to be valued, a view would need to have some form of physical attribute. This policy must allow a decision maker to come to a view as to whether particular locations contains physical attributes that would 'take it out of the ordinary' rather than selecting views which may not have any landscape significance and are based solely on community support.

Opinions on landscape are highly subjective, therefore, without much more robust evidence to demonstrate why these views and landscape areas are considered special, the policy in its current form will likely lead to inconsistencies in the decision-making process.

### **Policy 23 (Policy 23 – Nature Conservation)**

Policy 23 states that new development should retain features of high nature conservation or landscape value.

Paragraph 113 of the previous Framework refers to the need for criteria-based policies in relation to proposals affecting protected wildlife or nature conservation or landscape areas, and that protection should be commensurate with their status which gives appropriate weight to their importance and contributions to wider networks. As currently drafted, Gladman do not believe this policy fully aligns with the Framework. The policy fails to make a distinction and recognise that there are two separate balancing exercises which need to be undertaken for national and local designated sites and their settings. We therefore suggest that the policy is revisited to ensure that it is consistent with the approach set out within the Framework.

### **Conclusions**

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the DNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours Faithfully,

Megan Pashley  
Gladman Developments Ltd.

*[ - Ends - ]*

## D7 Anglian Water

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

| Part A: Respondent                      |  |
|---|--|
| Title / Name:                           | Mr Stewart Patience                                |
| Job Title (if applicable):              | Spatial Planning Manager                           |
| Organisation / Company (if applicable): | Anglian Water Services Ltd                         |
| Address:                                | Thorpe Wood House,<br>Thorpe Wood,<br>Peterborough |
| Postcode:                               | PE3 6WT  |
| Tel No:                                 |  |
| E-mail:                                 |  |

| Part B: Agents – Please complete details of the client / company you represent |  |
|--|--|
| Client / Company Name:   |  |
| Address:   |  |
| Postcode:  |  |
| Tel No:  |  |
| E-mail:  |  |

### Section Two: Your representation(s)

**To which part of the document does your representation relate?** (You may wish to complete a separate form for each separate representation)

| Paragraph No. | Policy No.         |
|---------------|--------------------|
|               | DEB3, DE4 and DEB5 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer)

Support  Support with mods  Oppose  **Have Comments**

**Please give details of your reasons for support / opposition, or make other comments here:**

It is noted that two sites are allocated for residential development together with a reserve site at Aspoll Road. Reference is made to the principle of residential development being acceptable subject to meeting the requirements of both the Neighbourhood Plan and Mid Suffolk District Local Plan.

The emerging Mid Suffolk Local Plan will includes a district wide policy relating to flood risk and drainage Plan and the existing Local Plan includes a policy on Sustainable Drainage..

As the Development Plan is intended to be read as a whole it is not considered necessary to include a similar policy in the Neighbourhood Plan. Therefore we have no comments to make relating to the Neighbourhood Plan

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

***Please be as brief and concise as possible***

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

Normally the Examiner will aim to consider the responses through written representations.

Occasionally an Examiner may consider it necessary to hold a hearing to discuss particular issues. If you consider a hearing should be held please explain why this is necessary.

Please note that a decision on whether to hold a hearing is entirely at the discretion of the Examiner.

**I consider that a hearing should be held because ...**

***Please be as brief and concise as possible***

*(Continue on separate sheet if necessary)*

Please indicate (tick) whether you wish to be notified of:

|  |   |
|--|---|
| The publication of the recommendations of the Examiner                   | ✓ |
| The final 'making' (adoption) of the NDP by Mid Suffolk District Council | ✓ |

**Signature: Stewart Patience**

**Date: 24<sup>th</sup> August 2018**



## D8 Boyer Planning (obo Taylor Wimpey UK Ltd)

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

| Part A: Respondent                      |                                     |
|---|-------------------------------------|
| Title / Name:                           | Daniel Hewett                       |
| Job Title (if applicable):              | Strategic Land and Planning Manager |
| Organisation / Company (if applicable): | Taylor Wimpey UK Ltd.               |
| Address:                                | As per agent.                       |
| Postcode:                               |                                     |
| Tel No:                                 |                                     |
| E-mail:                                 |                                     |

| Part B: Agents – Please complete details of the client / company you represent |   |
|--|---|
| Client / Company Name:   | Boyer   |
| Address:   | Unit 15<br>De Grey Square<br>De Grey Road<br>Colchester |
| Postcode:  | CO4 5YQ   |
| Tel No:  | 01206 769 018   |
| E-mail:  | jamesbailey@boyerplanning.co.uk                         |

### Section Two: Your representation(s)

**To which part of the document does your representation relate?** (You may wish to complete a separate form for each separate representation)

BMSDC Note: For convenience, we summarise further below all thirty-six representation forms submitted by Boyer obo their client. The following two entries apply in all cases:

| What improvements or modifications would you suggest?  |
|--|
| <ol style="list-style-type: none"><li>1. <i>Further work to be undertaken, in line with the recommendations of Statutory Consultees and the NPGs consultants, to ensure a comprehensive assessment of site selection has been completed, and which included evidence of deliverability of the sites.</i></li><li>2. <i>To ensure sustainable development can be achieved in Debenham through the Plan Period and beyond, the options taken forward through the draft DNP must give full consideration to Statutory Consultee comments, unless appropriately justified.</i></li><li>3. <i>The draft DNP should be informed by the strategic objectives of the emerging Local Plan and the outcome of up to date assessment of housing need that is to be produced in line with standard methodology as required by latest National Policy and guidance (NPPF 2018).</i></li></ol> |

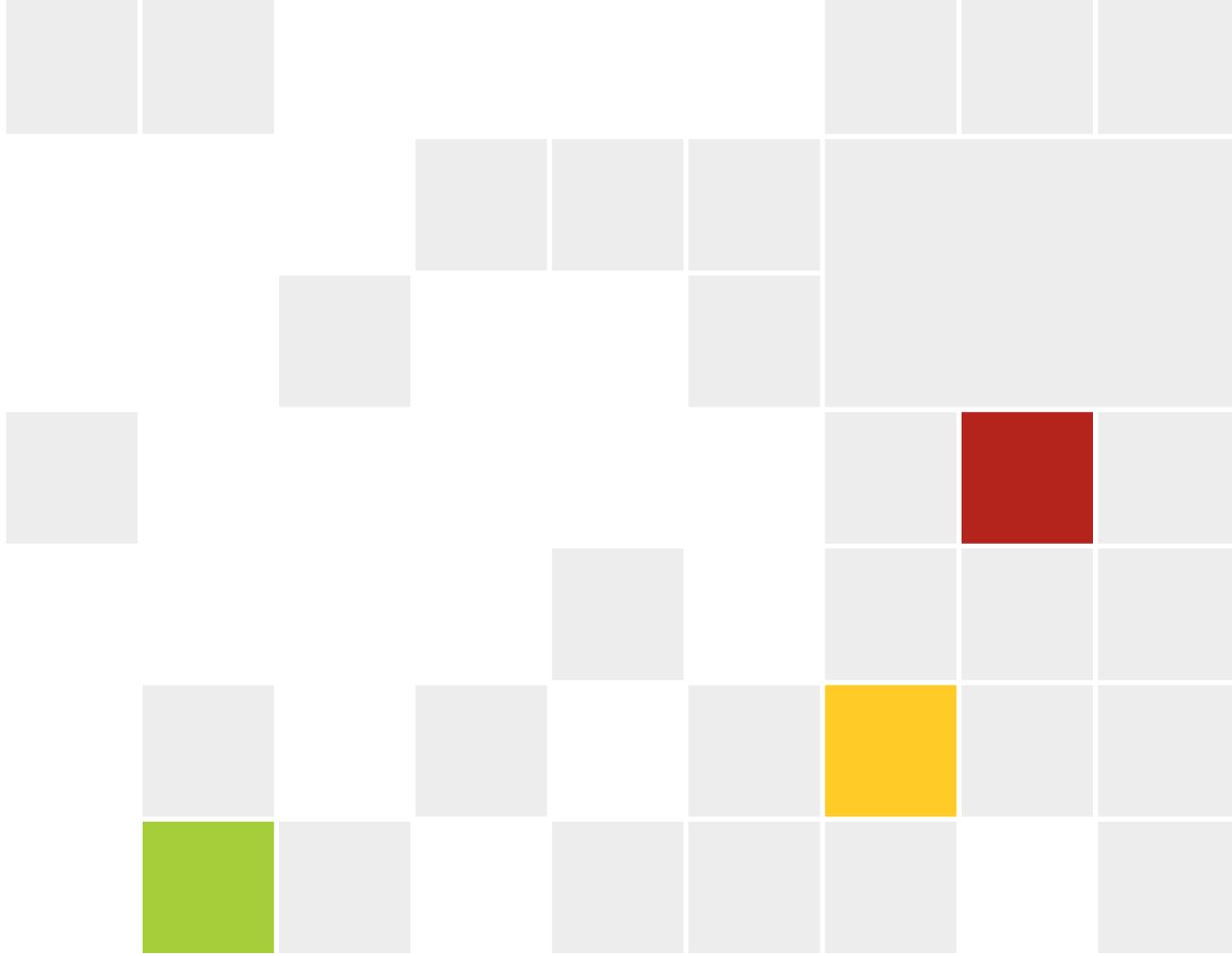
I consider that a hearing should be held because ...

*To provide appropriate and necessary opportunity for full examination of the draft DNP in light of the failure to follow due process and its lack of accordance with National Planning Policy and guidance, which render it unable to meet the Basic Conditions and therefore not appropriate to be 'made'.*

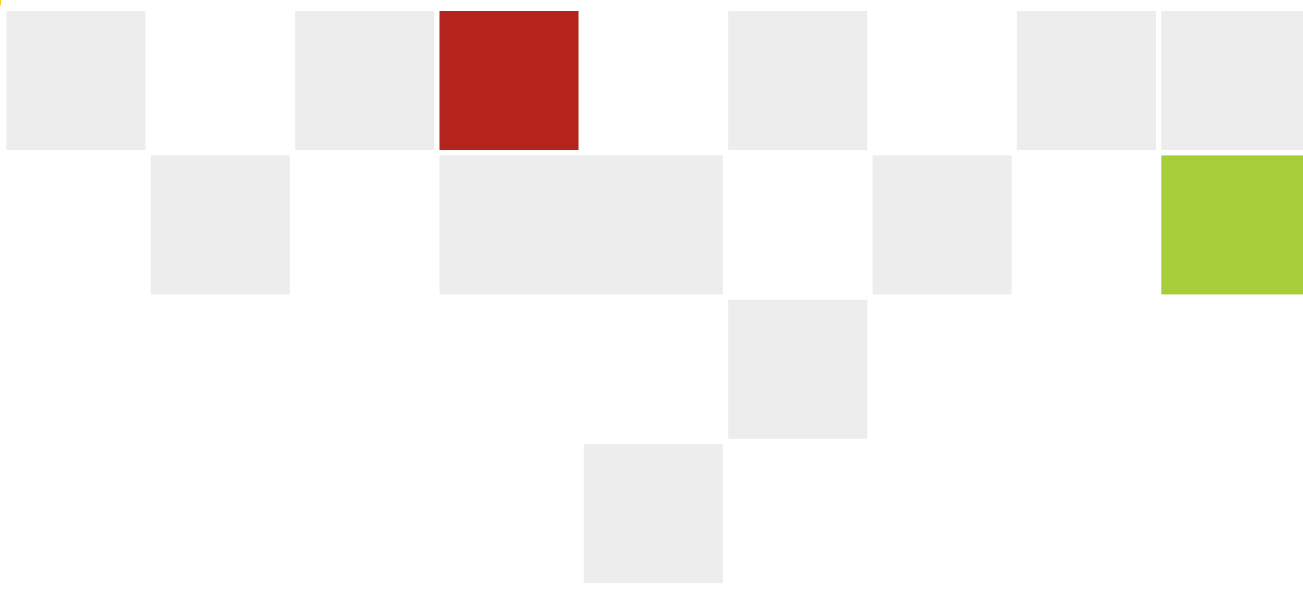
| Para No.   | Policy No. | Support / Oppose / Comment | Please give details of your reasons here:  |
|------------|------------|----------------------------|--|
| 1.1 – 1.6  |            | Support                    | Please refer to full representations to 'Section 1 – what is this all about?' as provided in 'Chapter 3' of the accompanying submission document from Taylor Wimpey.   |
| 2.5 – 2.14 |            | Oppose                     | Please refer to full representations to 'Section 2 – 'how have we gone about creating our plan?' as provided in 'Chapter 4' of the accompanying submission document from Taylor Wimpey.  |
| 3.19       |            | Oppose                     | Please refer to full representations to 'Section 3 – 'did you know?' as provided in 'Chapter 5' of the accompanying submission document from Taylor Wimpey.  |
| 4.1 – 4.25 |            | Oppose                     | Please refer to full representations to 'Section 4 – 'so how does our plan fit with the national and district plans? how many houses are we expected to accommodate, and where are they going?' as provided in 'Chapter 6' of the accompanying submission document from Taylor Wimpey. |
| 5.6. – 5.7 |            | Oppose                     | Please refer to full representations to 'Section 5 – 'how do we protect the unique landscape and character of our village?' as provided in 'Chapter 7' of the accompanying submission document from Taylor Wimpey.   |
| 6.3        |            | Oppose                     | Please refer to full representations to 'Section 6 – 'what about our unique charm of the built environment?' as provided in 'Chapter 8' of the accompanying submission document from Taylor Wimpey.  |
| 7.1 – 7.3  |            | Oppose                     | Please refer to full representations to 'Section 7 – 'we all know this village floods. How do we minimise future flooding with any further development?' as provided in 'Chapter 9' of the accompanying submission document from Taylor Wimpey.  |
| 8.1        |            | Oppose                     | Please refer to full representations to 'Section 8 – 'What about protecting our green areas and open space?' as provided in 'Chapter 10' of the accompanying submission document from Taylor Wimpey.   |
| 9.1 – 9.4  |            | Oppose                     | Please refer to full representations to 'Section 9 – 'so what is our vision for the village, and what are we trying to achieve?' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
|            | DEB 1      | Oppose                     | Please refer to full representations to 'DEB 1 (Policy 1 - Growth)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |
|            | DEB 2      | Oppose                     | Please refer to full representations to 'DEB 2 (Policy 2 – Appropriate Housing)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
|            | DEB 3      | Oppose                     | Please refer to full representations to 'DEB 3 (Policy 3 – Allocation of site north of Ipswich Road for development)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |

|     |        |         |   |
|-----|--------|---------|---|
|     | DEB 4  | Oppose  | Please refer to full representations to 'DEB 4 (Policy 4 – Allocation of site south of Low Road for development)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
|     | DEB 5  | Oppose  | Please refer to full representations to 'DEB 5 (Policy 5: Allocation of site east of Aspoll Road opposite Primary School)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |
|     | DEB 6  | Oppose  | Please refer to full representations to 'DEB 6 (Policy 6 – Consultation with the Parish Council)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
|     | DEB 7  | Oppose  | Please refer to full representations to 'DEB 7 (Policy 7 – Sustainability)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
|     | DEB 8  | Oppose  | Please refer to full representations to 'DEB 8 (Policy 8 – Housing Mix)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |
|     | DEB 9  | Oppose  | Please refer to full representations to 'DEB 9 (Policy 9 – Residential Car Parking)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |
|     | DEB 10 | Oppose  | Please refer to full representations to 'DEB 10 (Policy 10 – Lifetime Homes)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
| 9.6 |        | Oppose  | Please refer to full representations to 'Objective 2' in 'Section 9 – So what is our vision for the village, and what are we trying to achieve?' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.                              |
|     | DEB 11 | Support | Please refer to full representations to 'DEB 11 (Policy 11 – Traffic flows and non-residential car parking)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |
|     | DEB 12 | Support | Please refer to full representations to 'DEB 12 (Policy 12 – Non-motorised networks)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
| 9.7 |        | Oppose  | Please refer to full representations to 'Objective 3 (Policies 13-16)' in 'Section 9 – So what is our vision for the village, and what are we trying to achieve?' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.             |
|     | DEB 15 | Support | Please refer to full representations to 'DEB 15 (Policy 15 - Broadband)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |
| 9.8 |        | Oppose  | Please refer to full representations to 'Objective 3 (Policies 13-16)' as provided in 'Section 9 – So what is our vision for the village, and what are we trying to achieve?' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey. |
|     | DEB 17 | Oppose  | Please refer to full representations to 'DEB 17 (Policy 17 – Landscaping)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |
|     | DEB 18 | Support | Please refer to full representations to 'DEB 18 (Policy 18 – Green Spaces)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |

|              |        |                            |  |
|--------------|--------|----------------------------|--|
|              | DEB 19 | Oppose                     | Please refer to full representations to 'DEB 19 (Policy 19 – Gardens)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
|              | DEB 20 | Oppose                     | Please refer to full representations to 'DEB 20 (Policy 20 – Public Realm)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |
|              | DEB 21 | Support                    | Please refer to full representations to 'DEB 21 (Policy 21 – Conservation)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.  |
|              | DEB 22 | Oppose                     | Please refer to full representations to 'DEB 22 (Policy 22 – Views)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
|              | DEB 23 | Oppose                     | Please refer to full representations to 'DEB 23 (Policy 23 – Nature Conservation)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
| 9.9          |        | Oppose                     | Please refer to full representations to 'Objective 5 (Policy 24)' as provided ' in 'Section 9 – So what is our vision for the village, and what are we trying to achieve?' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey. |
|              | DEB 24 | Oppose                     | Please refer to full representations to 'DEB 24 (Policy 24 – Financial Contributions)' as provided in 'Chapter 11' of the accompanying submission document from Taylor Wimpey.   |
| 10.1 – 10.10 |        | Support with modifications | Please refer to full representations to 'Section 10 – So what is our vision for the village, and what are we trying to achieve?' as provided in 'Chapter 12' of the accompanying submission document from Taylor Wimpey.   |
| 11.1 – 11.8  |        | Oppose                     | Please refer to full representations to 'Section 11 – 'what else does the community say is important for the future of this village?' as provided in 'Chapter 13' of the accompanying submission document from Taylor Wimpey.                                      |



Representations to Debenham Neighbourhood Plan  
2016 - 2036 Submission Document (May 2018)



**Boyer**



These representations are submitted by Boyer, Cannon Consulting Engineers and CSA Environmental Ltd on behalf of Taylor Wimpey UK Ltd.

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## **APPENDIX**

Appendix One – Land north of Gracechurch Street Illustrative Masterplan

Appendix Two – Letter from Suffolk County Council (16th March 2018)

Appendix Three – Debenham Neighbourhood Plan Presentation (January 2018)

Appendix Four – Plan Illustrating Proposed Development of 30 Dwellings at Land to the South of Low Road

Appendix Five – Consideration of DNP Timeline and SCI Extract

Appendix Six – Land off Gracechurch Street Vision Document

Appendix Seven – Analysis of Consultation Statement

## 1. EXECUTIVE SUMMARY

- 1.1 We are writing to strongly object to the draft Debenham Neighbourhood Plan (hereon referred to as draft DNP).
- 1.2 The draft DNP is contrary to national planning policy and guidance, as well as local planning policy and it fails to meet Basic Condition (a). Equally, there is no review mechanism described in the draft DNP, which fails Basic Condition e). It is therefore not appropriate to 'make' the neighbourhood plan at this time (for reasons detailed through these representations), until further work has been carried out.
- 1.3 It is clear that 'due process' has not been followed in the preparation of the plan, and advice that has been provided by consultants to the Debenham Neighbourhood Plan Group (NPG), both by its own retained consultants and by Statutory Consultees, has not been heeded or addressed.
- 1.4 It is evident from the supporting documents published with the draft DNP (in particular the AECOM Site Assessment, December 2017; the AECOM SEA Environmental Report, June 2018; and the Consultation Statement, April 2018) that the NPG were advised that further detailed work must be undertaken to properly inform the evidence upon which the Neighbourhood Plan should be based. This further work related to: housing need, site assessments and viability, flooding, highways and education infrastructure requirements. This has not been undertaken. As such, the draft DNP cannot currently demonstrate that robust evidence has supported the choices made and the approach taken, as required by Planning Practice Guidance (Paragraph 41-040-21060211).
- 1.5 The AECOM Site Assessment (2017) report makes clear (section 3.1.1) that viability of the proposed allocation sites has not been considered, and they clearly advise that the Neighbourhood Plan "should be able to demonstrate that the sites are financially viable to develop". The draft DNP does not demonstrate the viability of any of the sites proposed for allocation. There is no identified basis to conclude that any of the sites selected can be demonstrated to be deliverable, as defined by the NPPF (2012, footnote 11). Government guidance makes it clear that "if the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable" (PPG Paragraph 005).
- 1.6 The AECOM Site Assessment (2017) report also acknowledges under 'next steps' (section 3.1.2) that "Some of the sites in the amber category may need further advice or assessment not possible to address through this high level assessment" ...and that "Once the pool of sites in the green category has been finalised, this provides a shortlist from which the proposed allocations can be selected. These should be the sites that best meet the aims and objectives of the Neighbourhood Plan. The criteria that are used to select the sites should be clearly recorded and made available as evidence to support the plan". This strongly suggests that the AECOM report recognised that the site assessment exercise undertaken was not itself sufficient to inform the site selection process of the draft DNP nor was intended to serve as the ultimate selection of sites for allocation.



- 1.7 In relation to housing need, the AECOM Site Assessment (2017) notes (on page 11) that there is currently no chosen preferred option for planned growth in the District. Instead, the NPG have contended that a proportional distribution of housing to the core villages (of the level of growth proposed in the Joint Babergh Mid Suffolk District Council's emerging Local Plan consultation document (August 2017)) has informed the draft DNP's proposed housing numbers. However, there is no presently identified housing requirement for Debenham. In light of the recently published revised NPPF (2018), the emerging Local Plan will need to determine the housing requirement based on a local housing need assessment, conducted using the standard method. It will also need to give consideration to a more up to date population projections that are expected to be released in November 2018. As such, the housing growth proposed within the draft DNP is not based on evidence gathered from a robust or up to date assessment of housing need for the plan period. The draft DNP therefore appears a premature exercise, and its value is questioned in light of the position of the emerging Local Plan. Indeed, in addition no provision (or, for that matter, recognition of the need) for review of the neighbourhood plan following adoption of the emerging Local Plan has been included in the draft DNP. The draft DNP does not therefore meet Basic Condition e).
- 1.8 It is considered that the failings of the approach adopted by the NPG in relation to housing numbers, is reflected by AECOM in the Site Assessment report in their apparently unanswered offer of further assistance, "Should more detailed evidence of housing need be required, including what type of housing is needed" (second paragraph, page 11).
- 1.9 It is clear that critical advice provided by Suffolk County Council (SCC) in relation to infrastructure requirements has been omitted from the evidence base. Comments provided by SCC in a letter to Debenham Parish Council dated 16th March 2018, or meetings that the NPG had with SCC, have not been referred to with the draft DNP or its supporting documents. Either such dialogue by meetings or correspondence has not taken place or the draft DNP has failed to transparently disclose a full account of engagement with key stakeholders, and advice accordingly received. On either basis the draft NDP is defective. It is evident that the advice provided by SCC in relation to house types (Lifetime Homes), archaeology, the contributions to be gained relative to the scale of development, and more critically, in relation to flood risk, transport, and education requirements, have not been reflected through the draft DNP's approach to development or the proposed policies. A failure to address identified infrastructure needs is therefore a clear omission of the draft DNP.
- 1.10 In light of these failings, the draft DNP cannot demonstrate that it contributes to the achievement of sustainable development as it does not demonstrate that it will effectively meet the needs of current or future residents in terms of housing, flood risk or education provision. In addition, the draft DNP cannot be said to be in general conformity with the strategic policies of the development plan due to the current status of the Local Plan and the yet to be confirmed requirements and preferred options for housing delivery.
- 1.11 The draft DNP therefore fails to meet Basic Conditions d) and e) respectively.

- 1.12 Whilst making reference within the AECOM Site Assessment (December 2017) to the most recent Strategic Housing Employment Land Availability Assessment (August 2017), it relies more heavily on sites included within the previous Strategic Housing Land Availability Assessment (May 2016). No explanation is given as to why the earlier document is relied upon, or why some sites that have been discounted in the most recent SHELAA (2017), were then included in their assessment. It is therefore considered that the site assessment is unjustified and perhaps contrived. Certainly, it does not represent a thorough assessment upon which to base the draft DNP.
- 1.13 The only site included within the AECOM Site Assessment (2017) that has been fully evaluated in terms of its achievability and its impact on critical matters such as flooding, highways, landscape and contributions, is the land north of Gracechurch Street, which is currently under consideration by the local planning authority through an outline planning application. Surprisingly, this site has been omitted from the draft NDP (Appendix One).
- 1.14 Gracechurch Street is the only site that can not only deliver flood alleviation to address flooding issues and flood risk that may result from proposed development but also alleviate flooding issues that currently exist in Debenham.
- 1.15 The current application demonstrates that the site is also capable of delivering highways improvements, and is also willing and able to contribute to resources required to address the much needed improvements to the oversubscribed education facilities. This site has not been taken forward through the AECOM Site Assessment (2017), despite being able to demonstrate its impact and contributions far more robustly than any of the other sites included in the assessment. In fact, the impact of the sites proposed for allocation in the draft NDP in terms of critical matters of flood risk, highway impact and contribution to education provision, have not been evaluated at all.
- 1.16 This Neighbourhood Plan in its current form must be found inappropriate and unsound in terms of its planning merits.
- 1.17 Evidence to support the Draft DNP proves that it is flawed in its approach, procedure, and content.
- 1.18 The evidence presented by the Parish Council and the Neighbourhood Plan Group (NPG) is unfortunately highly contrived and selective, and does not truly reflect the comments and advice that have been provided by statutory consultees.
- 1.19 The omission of the comments provided by SCC on 16th March 2018 (see Appendix Two) serves to illustrate this point.
- 1.20 Sadly, the Consultation Statement and the Consultation Log appear to be purposefully selective in content, recording, and representation.
- 1.21 Significant issues such as flooding, highways and education are directly identified in the draft DNP, but the Plan remains silent upon the means of tackling them. Such issues have been recognised by SCC but it seems these submissions have been omitted from the draft DNP.

- 1.22 It is considered that any further development will impact the High School capacity. The proper forward planning process (including Neighbourhood Plans) requires that solutions are provided, tested and properly assessed to ensure that the proposals are deliverable and will not cause adverse impact, including to other plan objectives. Without proper consideration of effective solutions (which are identified and explained in the plan) existing infrastructure issues in Debenham would be expected to worsen. In addition, if sites cannot prove to be deliverable they should not be included in Plans, otherwise there will be adverse implications, not only for Debenham but also for the district (and a failure thereby to conform with local and national policy). This includes undermining the ability of the local planning authority to be able to meet government objectives for housing supply including the 5 Year Housing Land Supply requirement.
- 1.23 It appears that Phase 2 of the consultation (Regulation 14 Stage) has been used to instigate opposition to a particular planning application (land north of Gracechurch Street, post the submission of the outline application, ref: DC/17/06293). Such an approach is not in the spirit of Neighbourhood Planning and localism (see Parish Council presentation in Appendix Three).
- 1.24 Regrettably, the Parish Council and the NPG appear to have purposefully sought to halt a single site being brought forward (land North of Gracechurch Street, post the submission of the outline application, ref: DC/17/06293), that already demonstrates deliverability, suitability and its potential to address the issues identified by the residents of Debenham. Meanwhile, 316 dwellings are accepted in the draft DNP across other sites that have not been appropriately tested and whose deliverability is un-assessed and un-demonstrated within the draft NDP documents. There is simply no proper evidence that they will be deliverable. This approach is not in the spirit of Neighbourhood Planning or Localism. Nor does it accord with national policy.
- 1.25 As a Core Village which serves surrounding villages and the wider catchment, particularly in terms of education, Debenham should be looking to take an appropriate share of development, particularly when compared to smaller settlements. This approach is not being embraced by the current Draft DNP.
- 1.26 Overall, the draft DNP fails properly to examine and thence transparently present fair and genuine options to the residents of Debenham for their consideration. It is important to make good planning decisions that will affect existing and future generations, and it is suggested that this has not taken place through the draft DNP to-date.
- 1.27 We would recommend that given the absence of substantive evidence, the draft DNP must be modified through the inclusion of further testing and evidence to fully demonstrate that the Neighbourhood Plan supports deliverable sustainable development for the village through the Plan Period that accords with National Planning Policy and guidance, and strategic aims of local planning policy.
- 1.28 In consequence, the draft NDP as presented should not be taken forward.

## 2. INTRODUCTION

- 2.1 These representations are submitted by Boyer on behalf of Taylor Wimpey UK Ltd. in response to the publication of the draft Debenham Neighbourhood Plan (DNP) that was submitted to Mid Suffolk District Council (MSDC) for consideration under Regulation 16 of The Neighbourhood Planning (General) Regulations 2012.
- 2.2 Independent consultants, Boyer, Cannon Consulting Engineers and CSa Environmental have collectively reviewed the draft DNP document that has been prepared and submitted by Debenham Parish Council. On behalf of Taylor Wimpey, we jointly provide the following comments, which are intended to be supportive of the neighbourhood plan process for the Parish of Debenham.

### **Land North and South of Gracechurch Street, Debenham**

- 2.3 These submissions make specific reference to two parcels of land in Debenham to which Taylor Wimpey has a direct interest. This is land to the north and south of Gracechurch Street, Debenham, as illustrated in the site plan at Appendix One. The draft DNP document has been reviewed in its own context, but also in relation to these two sites. The representations refer to relevant sections and policies ordered as per the consultation document, but also refer to these sites at certain appropriate points. It appears that the DNP is advancing significantly and inappropriately in front of the emerging Local Plan, and against our application site (DC/17/06293).
- 2.4 These two sites are being promoted for future residential-led development through the appropriate Local Plan process and through representations to the Babergh & Mid Suffolk District Councils (BMSDC) Joint Local Plan (ref. SS0267 and SS0642). There has been considerable direct engagement with the DNP, through direct conversations with the NPG at the Parish Council.
- 2.5 The site comprising land to the north of Gracechurch Street, Debenham is currently being considered by MSDC under an outline planning application with all matters reserved except for access. It is being considered for development of up to 295 dwellings, 2ha for potential primary school site or community/care use, and two new vehicular accesses from Gracechurch Street., It also includes associated flood alleviation and attenuation features, as well as associated public open space and landscaping, and other infrastructure and utilities. The application reference is DC/17/06293.
- 2.6 We believe that the land to the north and south of Gracechurch Street are the only sites capable of delivering the necessary improvements to the existing infrastructure of Debenham, notably the expansion space required for the High School which is already at capacity.

- 2.7 Taylor Wimpey have sought to proactively engage with the Parish Council early in the evolution of the development proposals for the sites, which are also being promoted through the Joint BMSDC Local Plan. Taylor Wimpey has also engaged with the Neighbourhood Plan process and has worked cooperatively with the Parish to inform the NPG of the emerging proposals, and to directly input to the emerging Neighbourhood Plan Document.
- 2.8 The draft DNP does not meet the Basic Conditions as required by Paragraph 8(1)(a)(2) of Schedule 4B to the Town and Country Planning Act 1990 (inserted by the Localism Act 2011). It is our view that the current draft DNP fails to address the Basic Conditions as it is not in conformity with National and Local Policy; the document is flawed as it has not chosen to tackle the existing infrastructure issues highlighted to the NPG by statutory organisations. As such, it has not followed due process and has discounted suitable, achievable and deliverable sites, following an inappropriate ‘protectionist’ approach against specific applications which is contrary to the ethos of Neighbourhood Planning, Local and National Policy.
- 2.9 The emerging Local Plan has yet to identify a housing requirement for Debenham. Therefore, in making unquantified assumptions, the draft DNP risks being swiftly outdated following the progress of the emerging Local Plan. This is contrary to Paragraph 14b) of the NPPF (2018) which states “*the neighbourhood plan contains policies and allocations to meet its identified housing requirement*”.
- 2.10 Our comments, on behalf of Taylor Wimpey, are therefore set out below, and reflect the order and sequence of questions included within the draft Neighbourhood Plan Document. We have also sought to include reference to specific parts of the draft DNP evidence base, and to include relevant additional information with the appendices attached to this submission.

### 3. SECTION 1 – ‘WHAT IS THIS ALL ABOUT?’

- 3.1 This section is very useful and clearly sets out the background information to the reader, including the rationale for the Neighbourhood Plan. It also explains the policy context in which the draft DNP has been prepared. It helpfully makes it clear that the Neighbourhood Plan covers the same period as the emerging BMSDC Joint Local Plan: 2016-2036.
- 3.2 Paragraph 1.6 makes particular reference to growth in the village, and the desire to increase the proportion of young people living in Debenham. We also note it refers to catering for existing residents who may wish to downsize, through the delivery of affordable, smaller homes, capable of meeting well established local needs.
- 3.3 We support the objective to provide for the sustainable development of the village through “*the achievement of a better balanced community*”, which also echoes principals set out in national planning policy through the National Planning Policy Framework (2012 and 2018).
- 3.4 An updated version of the NPPF was published on 24<sup>th</sup> July 2018. The draft DNP has therefore been written in reference to the 2012 version of the NPPF. It is noted that Paragraph 214 of the NPPF (2018) confirms that policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019. However, we have sought to refer to both the NPPF (2012) and the NPPF (2018) as and where appropriate to do so.

## 4. SECTION 2 – ‘HOW HAVE WE GONE ABOUT CREATING OUR PLAN?’

### Community Engagement Process

- 4.1 Paragraph 2.5 states that the consultation undertaken raised issues regarding parking and traffic flows, particularly around the junction comprising: the High Street and Gracechurch Street; outside the High School; Primary School; doctors surgery and around Great Back Lane. Our comments in terms of traffic and parking are addressed throughout these representations.
- 4.2 We agree with paragraph 2.6 and the aspiration for the provision of new and appropriate housing, and the availability of affordable housing for young people. We would contest that development of the sites to the north and south of Gracechurch Street would be able to contribute significantly more to affordable housing numbers. Smaller allocations on the other hand, may not be able to achieve this to the same degree or level, and may not meet the village's local need.
- 4.3 Paragraph 2.7 states a need for infrastructure in line with further development, including car parking, services, facilities and support for the school and local businesses. We consider that, given their size and location, the development of sites SS0267 (land north of Gracechurch Street) and SS0642 (land north of Low Road) would provide some of the additional and supporting infrastructure that is cited by the draft DNP, especially in relation to the High School. However, again we would suggest that the proposed sites in the draft DNP, which are smaller and poorly located in comparison, will not be able to achieve this infrastructure provision to the same degree.
- 4.4 Paragraph 2.8 highlights housing as a priority within the Neighbourhood Plan. Sites SS0267 (land north of Gracechurch Street) and SS0642 (land north of Low Road) would deliver the housing required for Debenham over the plan period (to 2036), and would at the same time allow the village to grow in a carefully planned and considered fashion, with the housing growth and infrastructure needs being more in balance.
- 4.5 Debenham has been considered a Key Service Centre in line with the BMSDC Settlement Hierarchy Assessment (2017). We note that Paragraph 2.13 indicated that respondents wanted more core utilities to be provided, including local schools, shop improvements, better leisure facilities and parks and play areas. We consider that the development of sites SS0267 (land north of Gracechurch Street) and SS0642 (land north of Low Road) would enable the provision of such improvements, especially in terms of schools and education, for the benefit of the wider community. It is considered that the current smaller allocations will not be so capable in achieving this, so the needs of existing residents of Debenham will not be able to realise these goals.
- 4.6 Although it is admirable to acknowledge existing issues, such as the High School being at capacity, it is concerning that these identified needs are not being directly addressed.

- 4.7 It is suggested in paragraph 2.13 that respondents highlighted the need to reduce flood risk as a very important element of the draft DNP for Debenham. We do not believe this is achieved by the current version of the draft DNP, especially through the site selection as proposed. There is no evidence to suggest the deliverability of these sites, or any testing undertaken that would demonstrate what they could achieve to justify their inclusion ahead of our application site. It has been demonstrated that development of the Taylor Wimpey sites (SS0267, land north of Gracechurch Street; and SS0642, land north of Low Road) provides an opportunity to contribute to settlement-wide flood alleviation measures due to their size, scale and location within the drainage catchment. This is further set out in Chapter 9.
- 4.8 It is pleasing to see the majority of residents acknowledging the need for new homes, as highlighted in Paragraph 2.14. We also note that 14% of residents actually suggested allocations of one or two larger sites to achieve the required new housing, with respondents also recognising the need for better infrastructure. We suggest that such improvements can only be properly achieved through the successful delivery of larger sites. Future generations may be faced with more infrastructure issues because of past missed opportunities.



## 5. SECTION 3 – ‘DID YOU KNOW?’

### **Employment**

- 5.1 We challenge the assertion in paragraph 3.19 which suggests that new housing development in Debenham would be unsustainable due to the lack of local employment opportunities in the village.
- 5.2 We do not believe this to be the case, and suggest Debenham as a ‘Core Village’ with its facilities and amenities, including a High School, Primary School, leisure centre and doctors surgery, make it a highly sustainable location capable of taking its fair share of growth.
- 5.3 Debenham has rightly been identified as a ‘Core Village’ because of its facilities and amenities, and if this important village does not take its fair share of development, it will undermine the housing delivery targets of the Districts, and will put undue and unnecessary pressure on other settlements. This would soon lead to housing delivery problems elsewhere, a lack of a 5 year housing land supply, and inappropriate and unplanned development
- 5.4 To be effective, Neighbourhood Plans must make tough decisions, and not jeopardise the health, wealth and happiness of future generations.

## **6. SECTION 4 – ‘SO HOW DOES OUR PLAN FIT WITH THE NATIONAL AND DISTRICT PLANS? HOW MANY HOUSES ARE WE EXPECTED TO ACCOMMODATE, AND WHERE ARE THEY GOING?’**

### **Policy Context**

- 6.1 The notion that the draft DNP seeks “to make the best from the current starting position, balancing the ‘need and desire’, with the ‘practicality’” is supported.
- 6.2 It is our view that proposals for land to the north and south of Gracechurch Street provide the most suitable and deliverable opportunity for achieving the additional improvements to services and infrastructure in the village that best serve the local and wider community through the plan period and beyond.
- 6.3 Supporting the delivery of these two sites would accord with the statement at Paragraph 4.1 that “the opportunities that new developments may afford the village should be considered as part of the evolving process”.

### **Emerging Joint Local Plan Considerations**

- 6.4 The financial incentive set out in 4.7 for adopting a neighbourhood plan is positive to note, as is the connection to community benefits. However, we suggest the must be in accordance with national and local Planning policy. Unfortunately, this is not the case at the current time.

### **Planning for Housing Growth**

- 6.5 The interpretation of housing delivery set out under paragraph 4.8 is questioned. We would strongly disagree with the assertion that “*there is no requirement to find sites in the village to meet the Core Strategy requirement to 2027 as Debenham will have provided over 120 homes without any additional sites coming forward*”. We consider that this does not reflect planning for future needs, or growth of the village. It also does not embrace the spirit of ‘Neighbourhood Planning’, which is for local communities to guide growth for the future of their settlement.
- 6.6 Paragraph 4.8 and 4.9 must be updated to reflect the most recent BMSDC Annual Monitoring Report (AMR) publication and latest 2016-based household projections, which will not be published until September 2018. In this sense, the figures and assumptions are a) not up to date, and b) premature.

- 6.7 Paragraph 4.9 states “at this stage, it is not known what the emerging local plan is likely to say about the housing needs of the district over this period”. Paragraph 4.12 goes on to suggest “Without a preferred option being chosen at this time, it is not possible to identify a specific amount of growth for Debenham based on the Local Plan options”. Due to its timing (which appears to be in response to Taylor Wimpey’s application), the draft DNP runs this risk of being superseded by the emerging Local Plan. We therefore question how allocations have actually been decided, when there isn’t yet a set level of growth. There is also little evidence to suggest how these allocations have been arrived at through an appropriate ‘sieving process’. The DNP’s content, analysis, and timing is set to respond to our application, rather than to provide proper consideration for the future of the village over the Plan Period.
- 6.8 We would go further to challenge Paragraph 4.12 which states “a proportional distribution of this growth to the Core Villages, based on current population, would result in a requirement of between 84 and 167 homes in Debenham between 2014 and 2036”. There is no proper justification as to how the draft DNP has arrived at these figures, or what evidence supports this. Before ‘making’ the draft DNP, it would be vital to see a table which shows how this was calculated, and information on where the evidence can be found. The draft DNP may well be rendered rapidly out of date with the adoption of the Local Plan and currently includes no recognition of this, or provision for appropriate review.
- 6.9 As house builders, we strongly disagree with the assertion put forward at Paragraph 4.13 that “building at the same rate in Debenham as achieved over that period 2012-2016 would continue to meet the local need and contribute to the overall requirements of Mid Suffolk”. However, we consider that the requirements of the village are not yet known due to the current stage of the Local Plan, and so there is no evidence to support this assertion. Moreover, the needs of 2012 – 2016 are not necessarily going to be the same as now, or indeed the future. Paragraph 4.13 is then contradicted by Paragraph 4.17 which states “housing needs change over time and both the supply and the demand for different types and tenures of housing is influenced by factors such as the economy and changes to government policy”. Taylor Wimpey is actively aware that market demands can change relatively quickly. In order to avoid such problems, larger and deliverable sites should be allocated to agree what will be delivered and by when.

#### **Existing Settlement Boundary**

- 6.10 Paragraph 4.14 states “...in order to meet the identified housing needs it is expected that sites will need to come forward on greenfield sites outside the boundary”. We agree with this approach. Given that Debenham has limited spaces within its settlement boundary, we consider it is essential that greenfield sites outside the existing settlement boundary are allowed to come forward to meet the future needs of Debenham and the wider area.

### **Phasing of Housing Allocations**

- 6.11 We consider it unsuitable for Debenham to aspire to build at the same rate that it has done in the past as paragraph 4.18 states “*by examining housing completions over the long term in the village (2001-2016) it is noted that, on average, 15 new homes were completed every year. But this delivery comes in peaks and troughs. For example, 41 new homes were built in 2013-14 but only one the following year.*” We consider that the draft DNP should be striving to secure a sufficient level of suitable, available, and deliverable sites to ensure that sustainable supply of development can be delivered, along with the appropriate and necessary infrastructure to service the future needs of Debenham and its wider catchment.

### **Recommended Sites for Development**

- 6.12 Paragraph 4.22 states that sites SS0031, SS0902 and SS0268 combined could deliver between 112 and 262 new dwellings “*whilst minimising the impact on the setting and character of the village, on infrastructure ‘bottlenecks’, and on flooding*”. It is considered that this fails to offer the most comprehensive and sustainable approach to development in the village.
- 6.13 Allocation of SS0267 (land north of Gracechurch Street) and SS0642 (land north of Low Road) would not only provide for the necessary level of housing delivery required, but would also enable the most comprehensive package of community benefit to infrastructure and services to be secured. These would address existing and future key infrastructure issues, and seek to proof against possible future problems, rather than simply minimising short term impact. This would allow for a much better, robust and sustainable strategy for Debenham.
- 6.14 Our comments on the AECOM assessment of these sites, together with our own analysis, is provided in later sections of these representations in relation to proposed Policies DEB 3, DEB 4 and DEB 5.

### **Sites not Recommended for Development**

#### *Land North of Low Road (also referred to as land south of Gracechurch Street)*

- 6.15 Paragraph 4.24 states that site SS0642 (land north of Low Road) “has the potential to significantly change the size and character of the village. The site is far from the village centre facilities and is likely to have an unacceptable traffic impact on the village”. We strongly disagree and consider that the site would provide a natural extension to the village, which, with a strong vegetated framework and substantial new landscaping will respect the western edge of the village.
- 6.16 The site at Low Road was assessed under the Strategic Housing and Employment Land Availability Assessment (SHELAA) (August 2017) as:
- potentially suitable subject to further investigation regarding flood zone impact, landscape/townscape/historic assets impact and transport impact on the local area;

- having an estimated yield of 250 dwellings;
- being deliverable in 0-5 years.

6.17 The AECOM report (December 2017) provided the following analysis of the site at Low Road:

- Accessibility - Site itself not currently accessible; potential for access off Low Road, but Low Road forms a narrow bottleneck along almost all of its length between the site and the High Street, with very limited prospect for mitigation- also seemingly very limited prospect of car access to village centre via Wells Way/Bloomfield Way due to impermeable layout of residential cul-de-sacs. Scale of site would generate significant additional traffic. Seemingly remote prospect of access from Gracechurch Street, and scale of site would result in significant exacerbation of existing bottleneck there at junction with High Street. Reasonably distant from village centre services and facilities.
- Environmental Designations – lies within Impact Risk Zone of 2 SSSIs. Access to the south (Low Road) is affected by Flood Zone 2 and 3. Would require mitigation and drainage.
- Landscape and Visual Impact – landscape impact and visual impact are both medium. The site is well contained and slopes to the south. It is adjoined by existing development on two sides.
- Heritage considerations – Close to Grade II listed building Malting Farmhouse.
- Community facilities and services – poorly located in relation to services and facilities – 1110m. This is a particular issue given the limited ability of cars to the site – This is contrary to policy which would seek to reduce cars. This is an incorrect assertion. The aggregated nature of this assessment based on an assumed centre of gravity is misleading and underplays the true accessibility of the site to key local facilities such as the Leisure centre and High School that will attract significant use and is highly accessible by sustainable modes. Notwithstanding that the site provides opportunity for expansion and new infrastructure to supplement existing facilities in an already accessible location not afforded by other sites suggested in the plan.
- ‘Amber’ potential for site to change size and character of site. As such the site should have been considered further on the recommendation of AECOM at 3.1.2.
- Site is available immediately.
- Considered inappropriate for allocation.

6.18 In preparation for their promotion of development of land both north and south of Gracechurch Street, Taylor Wimpey have sought to undertake extensive analysis of the constraints and opportunities that the sites offer, and how these correspond with strategic objectives of the national and local planning policy. In relation to land off Gracechurch Street (Low Road), the following analysis can be provided in response to the AECOM assessment.

- 6.19 This is the only site that has the opportunity for direct expansion of the High School. SCC has confirmed in their letter to the Parish Council (16<sup>th</sup> March 2018) (Appendix Two) that the High School is currently oversubscribed (see further analysis provided at paragraph 11.46). The High School serves Debenham, as well as a wider catchment, and is also known to take a high proportion of pupils beyond this designated catchment area. Any new development within Debenham, or settlements within the school's catchment area would further exacerbate the current capacity issues. The school site is constrained in terms of further development to increase its capability to accommodate more pupils. The development of the site at Gracechurch Street and north of Low Road has demonstrated that it could facilitate development of the school by offering land for expansion, or the relocation of the staff car park to enable development on the existing site.
- 6.20 In relation to highway access, there is potential for the site to be accessed from both Low Road and Gracechurch Street.
- 6.21 As set out in supporting information to the planning application for land north of Gracechurch Street and accepted by the Authorities, not all traffic would travel to/from the east and impact on what AECOM term as 'bottlenecks'.
- 6.22 Whilst it is accepted that mitigation would need to be provided to overcome such issues, no evidence of the scale of problem or likely solutions is presented in the draft DNP evidence base. This evidence has been supplied in full within the supporting documentation to the planning application for the site north of Gracechurch Street that has allowed the Authorities to support proposals for mitigation that overcomes impacts on Gracechurch Street.
- 6.23 The AECOM report acknowledges this and recommends that *"some of the sites in the amber category may need further advice or assessment not possible to address through this high level assessment. Such advice could be commissioned through specialist consultants or in conjunction with relevant officers at MSDC (e.g. heritage) and Suffolk County Council (e.g. highways, education, waste, infrastructure) to allow them to be moved into either the green or red categories" ... "Once the pool of sites in the green category has been finalised, this provides a shortlist from which the proposed allocations can be selected. These should be the sites that best meet the aims and objectives of the Neighbourhood Plan. The criteria that are used to select the sites should be clearly recorded and made available as evidence to support the plan"* (paragraph 3.1.2). The AECOM report appears to be a preliminary exercise which sets out further required investigation, including engagement with Statutory Consultees in order to allocate suitable sites. AECOM clearly recognise that the site assessment undertaken was not comprehensive enough to fully inform the site selection process of the draft DNP, or that it was intended to serve as the ultimate selection of sites for allocation. This further work has not been undertaken by the NPG even though recommended by AECOM as necessary to properly assess the deliverability of the sites. This demonstrates a rushed and inappropriately protectionist approach adopted by the NPG in response to the Gracechurch Street planning application. This 'sieving process' is only

part-complete and neither an appropriate or comprehensive assessment which does not heed Statutory Consultee comments.

- 6.24 However, SCC has not provided guidance in respect of this site in their response of 16<sup>th</sup> March and clearly an important and necessary stage in site evaluation has been missed.
- 6.25 It should be noted that ‘accessibility’ in the review by AECOM is a weighted average to the ‘centre of gravity of the village’. This is simply misleading. A range of key facilities, such as the leisure centre, High School and Doctors surgery are clearly close at hand and within the acceptable walk in catchments defined by AECOM. Some of these facilities, such as the High School are more likely to generate walking trips than other facilities and would be used on a more frequent basis by those groups more likely to walk as observed in the village. As such, the location of the site in relation to those facilities makes it more accessible for key journeys by foot supporting the site as a sustainable location for development.
- 6.26 It is noted, AECOM consider the site to negatively impact on the ‘bottleneck’ in Low Road. No evidence in the AECOM report is based on actual surveys and nor has there been any consideration with the appropriate bodies as to the mitigation that could be provided. AECOM advised that this was outside of the remit in the high level assessment and as such more detailed assessment was considered necessary by AECOM prior to identifying sites for allocation.
- 6.27 We challenge the AECOM report in terms of the suitability of site SS0642 (land north of Low Road) for development. Whilst it states that access via Low Road would be problematic due to its width (5 metres), we consider that development of the site would contribute to improving existing infrastructure, including roads. Indeed, an opportunity exists for an access to the site from Gracechurch Street in order to access the site to the rear of the High School. Furthermore, the location and scale of site SS0642 (land north of Low Road) provides an opportunity to include a flood alleviation facility to help control flows in the flood prone Low Road watercourse (Cherry Tree Brook) prior to then reaching the village. We consider the site to be well located to key amenities such as the High School and Leisure Centre. The site also provides the opportunity to investigate further solutions to the Gracechurch Street “bottleneck”, for example a potential alternative bus route to the school. Additional land to offer access off Gracechurch Street was submitted to the Local Plan (November 2017), so it is surprising that this was not picked up on by AECOM or by the NPG/Parish Council who were aware of these proposals.

- 6.28 It is noted that such solutions have not been considered in the evidence base and neither is detailed assessment undertaken as to the scale of the problem. Such work has been carried out in support of the planning application for land north of Gracechurch Street and supported by the Authorities. Such analysis and solutions would be equally capable of being considered for land north of Low Road to alleviate the AECOM identified bottleneck. It should be noted that of the identified bottlenecks in the village AECOM identify, the High Street and Gracechurch Street 'bottlenecks' are of equal severity and less severe than Low Road. However, there is no objective evidence on which to base these observations. The only objective analysis of any bottleneck has been provided by Taylor Wimpey as part of the planning submission that received no objection from SCC in terms of highways impact having agreed suitable mitigation.
- 6.29 There is a notable exclusion of a key stage in the assessment of sites as noted within the AECOM report at paragraph 3.1.2. The shortcomings of the high level assessment carried out by AECOM are recognised and in "next steps" it is recommended that further consultation with appropriate bodies is carried out. This has not been undertaken. The only comments provided by SCC are in relation to the consultation of the draft DNP which had already selected sites. SCC has only commented on those sites included and has not excluded any sites, including the land north of Gracechurch Street. However this site has been fully assessed and commented on in full as part of the planning application process. There is no objection to that particular site. The absence of this important step in site assessment is a fundamental failing in the preparation of the plan.
- 6.30 It is noted that AECOM state development of the site to have low visual impact on the surrounding area. We would agree and consider that the site has much to offer in terms of wider community benefit due to its size and scale.
- 6.31 It is considered that the AECOM report mainly places a focus on vehicular access to the site at Low Road, and does not reflect policies which aim to promote sustainable transport, nor has it considered the latest site proposals.

#### *Land North of Gracechurch Street*

- 6.32 It is noted in paragraph 4.25 of the draft DNP that site SS0267 (land north of Gracechurch Street) is not recommended for development. It is stated that the site "*has the potential to significantly change the size and character of the village. Development would have significant traffic impact along a bottlenecked Gracechurch Street towards High Street. It would have an unacceptable visual impact, and increase the risk of flooding, with surface water from the development discharging at the north end of the village*".



- 6.33 We strongly disagree with this. The proposals set out in the current planning application (ref: DC/17/06293) demonstrates that the site would provide much needed housing whilst offering flood alleviation and surface water management measures that respect the already problematic flooding in the area. The supporting documentation to the current outline planning application, and the fact it has not received any objections from any of the statutory consultees in relation to critical matters of highways, education and flooding, clearly demonstrates this.
- 6.34 In the Strategic Housing Land Availability Assessment (SHLAA) (May 2016), the site at Gracechurch Street (referred to as DEB(NS)02) was assessed as follows:
- Potentially suitable but further investigation is required regarding highways (access, footpaths and infrastructure required);
  - Information regarding landowner not known;
  - No indication of likely timescales for delivery;
  - Estimated yield of 100 dwellings.
- 6.35 The site at Gracechurch Street was then assessed under the Strategic Housing and Employment Land Availability Assessment (SHELAA) (August 2017) as follows:
- Site is potentially suitable but further investigation is required regarding highways (access, footpaths and infrastructure required).
  - Site is immediately available and in single ownership.
  - The site could be delivered in 0-5 years.
  - Estimated yield of 150 dwellings.
- 6.36 The AECOM report (December 2017) provided the following analysis of the site at Gracechurch Street:
- Accessibility – potential for car access to Gracechurch Street and pedestrian/cycle access to The Butts. Gracechurch St offers direct access to most village services and facilities, but is narrow without opportunity for widening as it approached the High Street, forming a bottleneck. Immediate new car access would be created west of the houses, on the north side of Gracechurch St, and it has the potential to provide cycle and pedestrian access to a new development.
  - Environmental Designations – Impact Zone 2 of SSSI. Access to the north (The Butts) affected by Flood Zone 2 and 3. Would require mitigation/drainage.
  - Landscape and Visual Impact – Western side of site has medium landscape sensitivity with high visual impact as it is adjoined by residential development on one side and is elevated and exposed. The eastern part of the site has low sensitivity to development and

low visual impact. There is no defensible boundary on western edge as it passes directly across a field. New boundary (hedge) could be created as part of new development.

- Heritage considerations – no constraints.
- Community facilities and services – moderately located in relation to services and facilities – 660m.
- Not of scale that would significantly change the size and scale of the village, particularly if eastern part was developed.
- Site immediately available.
- Appropriate for allocation.

6.37 In preparing their application for development of land at Gracechurch Street, Taylor Wimpey have undertaken extensive analysis of the site. The following analysis is provided in response to the AECOM assessment of the site.

6.38 The AECOM report states that access via Gracechurch Street is restricted as the road is narrow, forming a 'bottleneck'. However, we consider that development of site SS0267 would be able to lead to an improvement of the existing situation at the point, as detailed in our application (ref: DC/17/06293). This would not only benefit the site, but also the wider community. The improvements have been prepared in consultation with SCC as Highways Authority (HA) using detailed modelling and observations of the junction and identified bottlenecks. This level of survey work and consultation with the HA has been missing from the evidence base presented in support of the draft DNP, though it was recommended by AECOM. Having reviewed the outline planning application for land north of Gracechurch Street (DC/17/06293) in detail, the HA have raised no objection.

6.39 The support of Officers of both the Highway and Planning authorities suggests that the scale of development proposed at the site would not result in the negative impact of a single large site, as reported within the draft DNP. The preference of the draft DNP is to allocate sites further from essential services, with questionable accessibility and not based on more detailed assessment recommended by AECOM. This lack of refinement in the site assessment process and exclusion of a key stage is a fundamental flaw. This is evidenced by the comments of SCC in their March 2018 response that was excluded from the consultation documentation and has not been referred to even following a meeting with SCC prior to publishing the draft DNP for consultation.

6.40 The AECOM report also states that there is no defensible boundary on the western edge of the site, but careful development with a landscape led approach would provide this, again as identified in our application (ref: DC/17/06293).

- 6.41 AECOM agree that the site is well located in relation to existing service and facilities. We consider this site would go further and that the development of this site would enhance these facilities. The contribution that would be made to many of these facilities through the Community Infrastructure Levy (CIL) and other obligations from a site of this scale should be acknowledged. Furthermore, the leisure centre and businesses within the village would benefit from increased footfall and a higher critical mass generated through new residential development in Debenham. This may also in time create new facilities to cater for the increased need in the village.
- 6.42 In our view, the draft DNP overlooks the suitability of the site as it states that the site would alter the current nature of the surrounding area. It is pleasing to see that the 'characteristics' section of the SS0627 Site Assessment Proforma ticks that the scale and nature of development **would not** significantly alter the size and character of the settlement. The 'summary' section also defines it as suitable for allocation. The site has been further tested via the current application and the evidence presented to us found it to have an acceptable impact on the character of the village and infrastructure according to the Statutory Consultees.
- 6.43 Furthermore, this site is the only one that has been considered in detail by the Statutory Consultees and in terms of access/highways impact by SCC with the benefit of detailed assessment. We consider the site should be concluded green not amber, in whole not part.
- 6.44 We agree with the findings of the AECOM report, which recognises site SS0267 as most appropriate for development compared to site SS0268. The report refers to this approach as ensuring 'contingency' and it is our view that allocation of this site would contribute towards future-proofing the growth of the village of Debenham.
- 6.45 It is noted in Section 3.1.2 that whichever of the sites SS0267 or SS0268 is allocated, "*each will have a degree of impact on an existing traffic bottleneck*". We agree and consider that SS0267 would have capacity to mitigate and improve this as supported by detailed evidence of the issues and mitigation strategy agreed by the Highway Authority, whilst SS0268 would struggle due to its size and location to address any of these issues.

## 7. SECTION 5 – ‘HOW DO WE PROTECT THE UNIQUE LANDSCAPE AND CHARACTER OF OUR VILLAGE?’

### Debenham Natural Landscape Character Assessment 2016

- 7.1 Paragraph 5.6 states that Debenham has “*a high value heritage environment that is susceptible to harm from inappropriate housing development or allocations.*” We would agree with this statement, which is of particular relevance in relation to the Debenham Conservation Area and the route through the village along the B1077 (Aspall Road/High Street). On the approach into the village from the north along Aspall Road, the village is announced by the start of the Conservation Area including a number of Listed Buildings. Site SS0268 lies to the immediate north east of the Conservation Area on the eastern edge of Aspall Road and we consider that the visual sensitivity of this view should be ‘High’ (rather than ‘Medium’), given its adjacency to the Conservation Area and role in announcing the village on the approach from the north. Furthermore we consider that allocation of this site for housing would adversely impact on the rural approach into the village and its Conservation Area, emphasised by the site’s elevated landform and lack of boundary vegetation to screen any proposed development.
- 7.2 Map 5, together with photographic Views 1-14, illustrate key views within Debenham and their sensitivity. These include a number of views from Gracechurch Street looking north across Site SS0267 as well as views from Aspall Road towards Site SS0268 and from Ipswich Road looking north across Site SS0031. It is fair to say that development on any of these sites will impact on these identified key views. Taking this into account, the layout of the application for land north of Gracechurch Street has been sensitively designed to respond to these views. The submitted Landscape Strategy illustrates how the two key areas of public open space within the development allow framed views looking north from Gracechurch Street. These views will also be enjoyed by users of the new areas of public open space.

## 8. SECTION 6 – ‘WHAT ABOUT OUR UNIQUE CHARACTER AND CHARM OF THE BUILT ENVIRONMENT?’

### Built Environment

- 8.1 Paragraph 6.3 sets out the key principals for “*new development proposals for sites adjoining the existing built up boundaries*”, with Map 3 identifying the Debenham settlement boundary. It is clearly important, therefore, to ensure any future development is well related to the existing settlement pattern and reads as a logical extension to the village. On this basis we would challenge the allocation of Site SS0268 under Policy DEB 5, as the site is poorly related to the existing settlement boundary, not being bound by existing built form on any of its four sides. Development of the site would therefore result in an extension to the north of Debenham which is at odds with the existing settlement pattern, protruding built form further north and east.
- 8.2 Paragraph 6.3 states that new developments should create landscape buffers with the countryside, avoiding hard edges. It also states that “*good pedestrian and cycle routes out into the countryside*” should be incorporated into proposals. We would agree with these principals, which have been adopted within the submitted Landscape Strategy for land north of Gracechurch Street. This clearly shows how both of these objectives have been met, with substantial new woodland planting to the western site boundary, providing a strong landscaped edge to the new development. It also shows a series of public open spaces running through the site with a network of new pedestrian and cycle routes connecting into the wider network of public footpaths.

## 9. SECTION 7 – ‘WE ALL KNOW THIS VILLAGE FLOODS. HOW DO WE MINIMISE FUTURE FLOODING WITH ANY FURTHER DEVELOPMENT?’

### Flooding in Debenham

- 9.1 We are pleased to see the flood risk synopsis and recommendations prepared by Taylor Wimpey’s consultants (Canon Consulting Engineers) for the Parish Council has been incorporated into the draft DNP (Paragraphs 7.1 – 7.3). It is however disappointing that the wording at paragraph 7.3 of the draft DNP shows a total misunderstanding of the aim and application of the Sequential Test and where it sits within the planning process. We would also question how to “*strongly*” apply the test. The Sequential Test aims to steer new development to areas with the lowest probability of flooding and should therefore be applied when deciding site allocations. It is evidenced through the selection of site SS0902 (south of Low Road) that this has not been done as this site has the greatest proportion of area at risk of flooding compared to all of the sites considered.
- 9.2 We clearly agree with Paragraph 7.3 (with the exception of the Sequential Test paragraph) and have already demonstrated compliance with the draft DNP for Site SS0267 through the submission of a planning application that has been supported by both the Environment Agency and the Lead Local Flood Authority. Inherent with small sites is a limited opportunity to make space for water. Site SS0642 (north of Low Road/south of Gracechurch Street) has a similar ability to SS0267 (north of Gracechurch Street) to offer both sizeable storm water attenuation facilities and flood storage areas that positively contribute to reducing flood risk within Debenham. Smaller sites cannot offer such a benefit.

### The Debenham Deficit

- 9.3 There appears to be a large tract of text within section 7, entitled ‘The Debenham Deficit’ that is completely un-evidenced in terms of its assertions, such as roads being at critical capacity level. The principal assertion is that infrastructure, such as highways is inadequate. Yet no detailed evidence or assessment has been carried out to consider these issues and whether solutions exist.
- 9.4 As stated earlier, the AECOM study considering individual sites considers there is an important next step for the draft DNP in considering more detailed analysis in respect of sites (3.1.2) particularly through engagement with SCC and MSDC officers. This has not been undertaken. In fact, the only consultation response from SCC in relation to selected sites in the draft DNP has been ignored, and no assistance has been sought in commenting on all the sites being considered even though this was identified as a limitation by AECOM of the high level assessment.
- 9.5 The same applies to issues that are settlement wide.

9.6 Such detailed analysis has been carried out in support of the planning application for site SS0268 Land north of Gracechurch Street and in particular in respect of the Gracechurch St bottleneck identified by AECOM. The scale of issues were assessed, solutions considered and accepted by SCC in support of the application. The assertion that a single access to such development creates more of a problem is simply unfounded and fails to accept that a site located on Gracechurch Street will not simply generate traffic to/from the east that affects the bottleneck. This is accepted by SCC and MSDC and mitigation has been agreed to support the site. Given the location of the site in relation to key infrastructure that generates travel, such as the High School and Primary School and its ability to improve such connectivity as acknowledged in response to the planning application it is likely that sites further away will generate adverse impacts. No objective assessment of this has been carried out.

## **10. SECTION 8 – ‘WHAT ABOUT PROTECTING OUR GREEN AREAS AND OPEN SPACE?’**

- 10.1 We would agree that the public open spaces within Debenham should be protected as set out in the draft DNP. Map 8 of the draft DNP shows the distribution of visually important green and open spaces in Debenham. These are generally located within the eastern part of the village, although it is acknowledged there are a number of green spaces in the west of the village not shown on the map. Whilst this section emphasises the importance of existing open spaces, it does not stress the importance of creating new area of public open space within future development proposals. This should be a key principal when identifying potential sites for new housing, so that the provision of open space remains relative to the size of the village.
- 10.2 The proposals for land north of Gracechurch Street offer a high quantum of new public open space serving the western part of Debenham. A total of 7.74 hectares of Green Infrastructure is proposed, which equates to approximately 43% of the total site area. These include a new community orchard, two children’s play areas, new woodland planting, flood alleviation and sustainable drainage features and substantial areas of amenity open space with numerous pedestrian and cycle links to the surrounding village and public footpath network. The Green Infrastructure will not only deliver a range of recreational benefits, but will also allow for the Site’s ecological value to be enhanced through the provision of a range of new habitats in the form of the new woodland, the treatment of the SuDS features and the establishment of new areas of wildflower meadow. Public open spaces of this nature and scale would not be achievable through the development of sites SS0031, SS0902 and SS0268 given their isolation from one another and their relative size.



## 11. SECTION 9 – ‘SO WHAT IS OUR VISION FOR THE VILLAGE, AND WHAT ARE WE TRYING TO ACHIEVE?’

### Vision

- 11.1 The Neighbourhood Plan’s ‘Vision’ includes providing support for a thriving community, whilst endeavouring to ensure the community remains at ease with itself. We would support this aspiration, and emphasise that the appropriate and effective method of achieving this is through a comprehensive approach to future growth in the village. This would require holistic consideration and support for existing services and facilities, as well as provision of infrastructure improvements and housing to meet any identified need.
- 11.2 Debenham is a large and well-served village in the heart of Suffolk. The village has evolved over centuries, with its heritage still evident throughout the village, not least in its centre which adds to much of the settlement’s character. As a result of continued growth, the village has benefited from a number of key facilities and services, principally the Primary School, High School, Leisure Centre and a Doctor’s Surgery. These serve not just residents of Debenham, but also surrounding settlements in the catchment as well.
- 11.3 The draft DNP states that the village has a growing elderly population and there is also an aim to provide affordable housing to accommodate younger people. Appropriate housing provision for both groups to meet an identified need, as well as services to support them, will be key to sustaining a thriving community. These aspirations are also supported.
- 11.4 The draft DNP also acknowledges that some of the existing facilities and services available within Debenham are already being stretched or could benefit from improvements, particularly with future population growth. For instance, the Primary School is reaching capacity; the High School is already over-subscribed; accessibility of the Doctor’s surgery could be improved. Pressures on infrastructure are also seen to be key priorities for the village, particularly in relation to flooding and highways. As has been demonstrated through the current planning application and submissions to the SHELAA (2017), these issues could be addressed through the development of sites SS0267 (north of Gracechurch Street) and SS0642 (north of Low Road). The proposals include provision of approximately 1.2ha of land for a new primary school (or community care facility); land for the expansion of the High School; a MUGA; flood attenuation and alleviation measures; and highway improvements including an alternative bus route to address conflicts at ‘pinch points’. The sites selected in the draft DNP have not been tested in terms of their impact or contribution to these critical infrastructure matters. It is expected that their ability to improve such issues would be limited due to the size and scale of the sites. It is unclear if these options have been genuinely presented throughout the neighbourhood plan process.

- 11.5 With continued growth of Debenham and surrounding catchment villages over the plan period, and beyond, it is therefore appropriate to ensure that the community is served with sufficient and effective facilities to support a thriving community. The level of growth in housing and infrastructure needs to be objectively assessed and agreed.
- 11.6 Through a holistic approach to future development, it is possible to consider these requirements in a comprehensive manner, and offer improvements to existing facilities and infrastructure, to serve the population of the village and surrounding settlements. This cannot be met through piecemeal approach to housing growth within the village without appropriate infrastructure provision. The development of the sites off Gracechurch Street, over the period of the plan would best serve the village by providing a genuine opportunity to achieve the desired and evidenced housing and facility and infrastructure improvements the village needs to thrive.

### **Objective 1**

- 11.7 It is right that the draft DNP should seek to secure development that meets the needs of the local community, and to satisfy the requirements of the emerging Local Plan. The proposals for land to the north and south of Gracechurch Street provide the most sustainable and comprehensive approach to achieve this.
- 11.8 It is considered that the wording used within the proposed paragraph is limited and slightly ambiguous, and could be amended to provide more clarity. For instance, "To provide sustainable forms of development, including new housing that meets the objectively assessed need of the community to satisfy up to date local housing requirement as identified by MSDC, provide necessary infrastructure to support a thriving community, and is sustainably located and minimise impacts on the village in terms of highway traffic, flooding and landscape setting".
- 11.9 In order to align with national planning policy, it is considered that there should be clearer acknowledgement of the objective to achieve sustainable development. The NPPF (2012 and 2018 versions) summarises this objective as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The draft DNP does not contribute to the achievement of sustainable development as it fails to demonstrate that it will effectively meet the needs of current or future residents in terms of housing supply, flood risk prevention or appropriate education provision. Whilst small sites may be preferable, it must be recognised that the critical highway, flooding and education issues identified by the local community can only be comprehensively addressed through larger scale development.

### ***Our aims***

- 11.10 The aims of Objective 1 emphasises the delivery of more affordable housing, especially for young people, in order achieve a sustainable community for Debenham.

- 11.11 To achieve sustainable development, in line with the NPPF's social objective, new housing development must provide "the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being" (NPPF, 2012, Paragraph 7).
- 11.12 The preference of existing residents for 2-3 bedroom houses is noted, but this needs to be supported by an up-to-date objective assessment of local need to ensure that the right type of homes are provided for the community, both now and in the future, as it is expected to grow and possibly change over the plan period and beyond.
- 11.13 The aim acknowledges that with the population increase there will be an impact on local facilities and infrastructure, including the village schools and doctor's surgery. It states that "*provision will need to be improved to take account of this*". However, it then goes on to state that the plan reflects the preference of residents for a number of small developments, rather than larger scale development. This would seem to be in contradiction with the 'aim'. The financial and physical contributions that would support existing facilities and infrastructure in the village, and also provide for additional improvements would only be achieved through developments of a scale that offer the land and/or funds to provide such contributions. The DNP needs to acknowledge the choice between the size of residential development sites and the need for infrastructure provision.
- 11.14 In this regard, the draft DNP already falls short of delivering on its proposed Objectives and Aim, as a result of the sites it has identified and proposed for allocation. It has been acknowledged through consultation responses from SCC, and discussions with the High School, that the school is already over-subscribed and is unable to accommodate any further expansion. As far as we can tell, the land promoted at Gracechurch Street provides the only opportunity for expansion of the high school, and so offers clear and essential benefits for the future sustainability of Debenham, as well as the surrounding catchment villages.
- 11.15 The general aims of the draft DNP are commendable, and we support some of the principal that are being advocated. However, there is clear contradiction between noting the impacts on infrastructure including schools and the Doctor's surgery, but only proposing smaller developments that do not have the physical capabilities, or financial viability, of making a difference to the identified infrastructure issues. These issues need to be resolved within the plan. A choice needs to be made between the preference for smaller development sites which have not demonstrated that they can viably seek to address existing or future infrastructure issues, or allocating larger sites which would look to address these issues.

#### *Affordable Housing for Debenham*

- 11.16 For consistency, the definition of affordable housing should accord with that set out in the NPPF.

- 11.17 The paragraphs provided under the sub-heading 'Affordable Housing for Debenham' set out a number of specific requirements that are not reflected in either policies of the draft DNP or the existing or emerging Local Plan.
- 11.18 Whilst there is policy provision at Local Plan level for the delivery of affordable housing, there are no other policies in the existing or emerging Local Plan that require the delivery of Lifetime Homes; that affordable housing is firstly offered to local residents; that require affordable homes to be of the specific size and types stated, be of particular design quality or deliver environmentally sustainable energy sources/technologies.
- 11.19 We strongly disagree with the suggestion that developments should be limited to a scale of less than 15 units. This is not supported by objective evidence, and such is considered to be contrary to the delivery of sustainable development. Furthermore, the stated preference for affordable units of 2 or 3 bedrooms is not based on an objectively assessed need. It also goes against the requirement in national planning policy for the size, type and tenure of housing needed for different groups in the community to be assessed and reflected in planning policies. The Strategic Housing Market Assessment (SHMA May 2017) illustrates that 27% of new owner-occupied in the Ipswich Housing Market Area (HMA) should be two bedrooms homes, 35.1% of homes should be three bedroom homes, and 28.7% should be four or more bedrooms. The requirement for four bedroom homes is not acknowledged within the draft DNP.
- 11.20 It is therefore considered that much of the content under the sub-heading 'Affordable Housing for Debenham' is contradictory, does not comply with national planning policy, and is not properly substantiated through evidence.
- 11.21 The aims for the location of growth in the village, as stated at the end of this section, are useful points of clarity, but it is considered that to have effect, they would be better served by being incorporated within the Objective paragraph itself, as we have suggested in the revised wording above.

**DEB 1 (Policy 1 - Growth)**

11.22 The AECOM Site Assessment Report (December 2017) states at section 1.1 that “without a preferred option being chosen at this time, it is not possible to identify a specific amount of growth for Debenham based on the Local Plan options” (section 1.1, page 11). It continues by stating that on the basis of the growth identified through the emerging BMSDC Joint Local Plan (9,951 new homes between 2014-2036), “a proportional distribution of this growth to the core villages, based on current population, would result in a requirement of between 84 and 167 new homes between 2014 and 2036, meaning the Parish Council is currently proposing to set the housing target in the Neighbourhood Plan as a minimum of 84 houses”. The precise workings for this proposed distribution, and how this has then evolved through discussions with MSDC to a total of 316 homes, as proposed in the draft DNP, is unclear. We would agree that it is currently difficult to quantify a suitable level of growth for Debenham based on the evidence currently available. Hence, we think the draft DNP is ‘premature’ until the Local Plan has provided detailed evidence of need, and further information on growth and apportionment across the District.

11.23 As a Core Village, Debenham should be taking its fair share of growth, especially when considering the need to support and enhance the current infrastructure, such as the local schools and leisure centre.

11.24 Policy DEB 1 specifies the provision of up to 316 dwellings to be delivered between 2016 and 2036. Whilst the suggested approach taken seeks to provide some ‘headroom’, equally it is questioned what would happen if the sites identified did not deliver on the 316 dwellings, or indeed if the housing requirement in the District and Debenham increased over the life of the Plan. No context has been provided within the draft DNP to demonstrate how the proposed figure of 316 dwellings has been obtained.

11.25 Furthermore, the range of houses identified for each site within their respective policies is very large, and the lower provision would significantly reduce the headway that DEB 1 has sought to provide. Furthermore, the lower end of this range would certainly deliver much lower contributions to infrastructure.

|                            | Land north of Ipswich Road (DEB 3) | Land south of Low Road (DEB 4) | Land east of Aspall Road (DEB 5) | Windfall (DEB 1) | Total |
|----------------------------|------------------------------------|--------------------------------|----------------------------------|------------------|-------|
| Upper limit (in draft DNP) | 140                                | 35                             | 87                               | 54               | 316   |
| Lower limit                | 60                                 | 15                             | 37                               | 0                | 112   |

Table 1: Upper and lower limits of development proposed through the draft DNP

- 11.26 It should be acknowledged, that the latest population growth projections are not due to be released until September 2018. The housing figure stated in the draft DNP will need to be reviewed as it is likely to be inconsistent, and outdated with the emerging household projections and identified housing need. It is therefore considered to be premature in its timing against the emerging figures, the emerging Local Plan and subsequent assessments.
- 11.27 It is also considered that it would be appropriate, given the plan period to which the draft DNP would cover, for the housing need to be determined using the most up to date methodology now required through the revised NPPF (2018). Certainly, the figure stated within policy DEB 1 should be demonstrated in supporting text, or evidence documents, that it represents the objectively assessed need for the village. In light of the emerging Local Plan, and provisions within revised National Planning Policy, together with new housing figures to be released imminently, it is unfortunate that the draft DNP has come forward now, particularly with no provision for review that would be necessary following the adoption of the Local Plan. It appears that the draft DNP is a deliberate attempt to rush ahead in response to the planning application for land north of Gracechurch Street.
- 11.28 The sites proposed for allocation through the draft DNP are set out in Policy DEB 1, with individual policy requirements for each site provided through Policies DEB 3, DEB 4 and DEB 5 respectively.
- 11.29 The three sites identified for growth under Policy DEB1 are not considered to represent the most sustainable approach to development to meet the holistic needs of the village to 2036. We have provided an analysis of the individual sites proposed, and why they are not considered appropriate for allocation. This is provided in the responses to each of their respected policies later in this submission. Some of this wording may therefore be repeated, but this is intentional.
- 11.30 It is interesting to note that the proposed draft DNP seeks to limit the delivery of the sites as the proposed strategy through Policy DEB 1 restricts site 3 (Policy DEB 5) from coming forward, only when site 1 (Policy DEB 3) and site 2 (Policy DEB 4) have both been successfully developed. There is no supporting evidence to demonstrate the deliverability of any of the three sites proposed within the draft DNP for allocation, and that they can actually be achieved.
- 11.31 The definition of 'deliverable', as set out at footnote 11 of the NPPF (2012) (and echoed in Annex 2 of the NPPF 2018) is interesting to note: "*To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable*". It is considered that the restricted approach to the release of site 3 (Policy DEB 5) could not be proven to be 'deliverable' in this regard, not least because it is reliant on site 1 (Policy DEB 3) and site 2 (Policy DEB 4) being delivered in time for site 3 (Policy DEB 5) to also come forward within five years. It is not clear how AECOM have contended with the SHLAA (2017) which discounted sites, only to include them again as potential sites for allocation. It so far seems that the report relies on the 2016 SHLAA rather than the more refined and up-to-date version from 2017.

11.32 Section 3.1.1 of the AECOM report confirms that viability assessments of the sites had not been undertaken to inform their assessment, and AECOM advised that the draft DNP would need to demonstrate that the sites are indeed financially viable. This is not demonstrated in the draft DNP to-date, particularly in relation to site SS0031. This is in stark contrast to land north of Gracechurch Street, which has demonstrated its viability and delivery through the current outline application.

11.33 Furthermore, site 1 (Policy DEB 3 - land north of Ipswich road) and site 3 (Policy DEB 5 - land east of Aspoll Road) were discounted as suitable sites for development in the latest Babergh Mid Suffolk Strategic Housing and Economic Land Availability Assessment (SHELAA) (2017). It is therefore questioned why these sites have now been considered suitable, and indeed considered to be the most appropriate options ahead of sites such as those at Gracechurch Street. The Gracechurch Street site we assessed favourably in the 2017 SHLAA, and have been able to further demonstrate their suitability, availability, and deliverability through the current outline planning application, which has received no objections from the necessary statutory consultees. It is our view that the sites proposed for allocation in the draft DNP have been selected as deliberate alternatives to the application site off Gracechurch Street without proper and full evidence of deliverability. This is perhaps illustrated in the section of supporting text to Policy DEB 1 where it is stated that the 'Principal Reason for policy' is "*To spread development across a number of sites in order to avoid and mitigate the negative impact a single large development would have on the character and infrastructure of the village*".

11.34 The approach adopted through the draft DNP is not considered to be a rigorous basis to ensure that the right number of homes can be delivered over the plan period. It therefore fails to accord with NPPF Paragraph 67, which states that from a SHLAA "*planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability*". The NPPF paragraph continues by stating that "*Planning policies should identify a supply of:*

- a) *Specific, deliverable sites for years one to five of the plan period; and*
- b) *Specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15 of the plan.*"

11.35 It is acknowledged that the revised NPPF (2018) encourages Neighbourhood Plan groups to consider the opportunities for allocating small and medium-sized sites (no larger than 1ha). However, national planning policy also advocates (NPPF, 2012 Paragraph 52 and echoed in NPPF, 2018, Paragraph 72) that the supply new homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages.

11.36 Whilst it is noted that the draft DNP would be assessed against the previous NPPF (2012), it is noted that Paragraph 72 of the NPPF (2018) goes on to state that, when identifying suitable locations for such development "*where this can help to meet identified needs in a sustainable way*", strategic policy making authorities should,

- a) *Consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) *ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) *set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principals), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*
- d) *make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations)".*

11.37 As demonstrated by the current outline planning application, the development proposed for land to the north of Gracechurch Street conforms with this approach to delivering sustainable development. As the draft DNP has sought to come forward ahead of the emerging Local Plan, it could prevent a suitable location for sustainable development, supported by necessary infrastructure and facilities, from coming forward at a strategic level.

11.38 It is clear the draft DNP is relying on three sites that have not proven, nor successfully demonstrated, their deliverability. This is an unsound and inappropriate approach on which to base the future growth of a village, which fails to comply with national planning policy.

11.39 Other than the provision for windfall development, no alternative or contingency site is suggested by the draft DNP, should any of the allocated sites proposed fail to be delivered. Given that Site 3 is restricted to coming forward only following the successful development of both Sites 1 and Site 2, this is a risky strategy to follow. Should either of these sites fail to come forward or be delayed, it would prevent the delivery of 122 – 227 homes, which would leave the village open to speculative development.

11.40 As already noted above, and in other sections of these representations, the draft DNP fails to comply with the NPPF and all adopted and emerging Mid Suffolk Development Plan Documents. It is questioned if the draft DNP can actually be put forward to be 'made' prior to the adoption of the emerging Joint Local Plan.

11.41 The AECOM report has been given significant weight in determining the sites proposed in the draft NDP despite it being made clear in the report that "*Some of the sites in the amber category may need further advice or assessment not possible to address through this high level assessment. Such advice could be commissioned through specialist consultants or in conjunction with relevant officers at MSDC (e.g. heritage) and Suffolk County Council (e.g. highways, education, waste, infrastructure) to allow them to be moved into either the green or red categories*".



- 11.42 The consultation comments provided by SCC unfortunately appear to have been omitted from the draft DNP. If such comments had been given greater consideration instead of being ignored, it is suggested some sites would have performed differently in the site assessment. Weight is also given by the NPG to the fact that the AECOM report is approved by the former Department for Communities and Local Government (DCLG). This is factually incorrect, overstated and misleading as although AECOM are (were) DCLG approved, AECOM are not DCLG. As far as we are aware, the content of the AECOM report has not been 'approved' by DCLG (now the Ministry of Housing, Communities and Local Government).
- 11.43 Section 3.1.2 of the AECOM report states that the pool of 'green' sites should form a shortlist from which the allocations can be selected. The report further states that "*the criteria that are used to select the sites should be clearly recorded and made available as evidence to support the plan*". This reiterates our earlier point that there is no evidence to suggest how these allocations have been arrived at through an appropriate 'sieving process'.
- 11.44 The windfall allowance of 54 dwellings, specified under Policy DEB 1 represents a sizable portion (17%) of the suggested 316 unit housing requirement for the plan period. The NPPF provides that "*where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.*" Whilst analysis of historic windfall delivery is set out in the supporting text, the draft DNP does not include supporting evidence that demonstrates that the windfall allowance of their housing delivery strategy is based on any compelling evidence that it will met by a reliable source of supply. This reliance on windfall sites does not appear to comply with the NPPF.

#### **DEB 2 (Policy 2 – Appropriate Housing)**

- 11.45 We agree that all new housing development should take account of, and respect, the landscape and built character of the village. We also agree with Policy DEB 2 criterion b), that the scale and nature of all development must ensure that an appropriate level of services, facilities and infrastructure are available or provided with the scheme. However, as the wording states, this needs to be applicable to 'all schemes' and it is questioned whether this could in fact be complied with by the sites that are proposed for allocation.
- 11.46 As acknowledged within the draft DNP itself, and previously noted within these representations, existing services, facilities and infrastructure such as education, flooding and health care, are at such capacity that it is critical for any new development to deliver investment for additional provision and/or improved services.
- 11.47 SCC have identified that the capacity of the village education providers is already at a critical issue. Early Years places and the High School are already oversubscribed, and the Primary school is currently reaching capacity. The tables below, taken from the comments provided by SCC illustrate the issue for the primary and high schools (see Appendix Two for full details).

| <b>Sir Robert Hitcham's CEVAP, Debenham</b> |                     |                       |                |                |                |                |                |                |
|---|---------------------|-----------------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>Permanent Capacity</b>                   | <b>95% Capacity</b> | <b>Total Capacity</b> | <b>2017-18</b> | <b>2018-19</b> | <b>2019-20</b> | <b>2020-21</b> | <b>2021-22</b> | <b>2022-23</b> |
| 210   | 200                 | 200                   | 191            | 191            | 187            | 187            | 194            | N/A            |

Table 2: Debenham Primary School capacity forecast. Source: Suffolk County Council, 16<sup>th</sup> March 2018

| <b>Debenham High</b>      |                     |                       |                |                |                |                |                |                |
|---------------------------|---------------------|-----------------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>Permanent Capacity</b> | <b>95% Capacity</b> | <b>Total Capacity</b> | <b>2017-18</b> | <b>2018-19</b> | <b>2019-20</b> | <b>2020-21</b> | <b>2021-22</b> | <b>2022-23</b> |
| 654                       | 621                 | 621                   | 677            | 670            | 667            | 654            | 644            | 636            |

Table 3: Debenham High School capacity forecast. Source: Suffolk County Council, 16<sup>th</sup> March 2018

- 11.48 According to the County Council's analysis, the Primary school would need to expand from a 210 place school to a 315 place school. Whilst it is understood that there may be capacity on the existing Primary School site to accommodate this, it is suggested by the County Council that in practical terms this may result in wider issues in relation to traffic impacts, in particular stating that "*there is a fundamental question of whether its current location maximises the potential for use of sustainable transport modes into the future*". (see Appendix Two for full letter and detail).
- 11.49 The High School does not have assets available for expansion to accommodate new pupils that would be generated through the growth in Debenham and its catchment area. It is actually already heavily reliant upon the adjacent Leisure Centre to provide additional facilities. It should also be noted that Debenham High School does not just take pupils from the village of Debenham, and so its capacity is also relevant to existing and future populations in other catchment villages. If the school does not have the facilities and resources to accommodate the pupil numbers required, it will therefore have an impact on the delivery of new development in the wider catchment also. It is understood that the County Council and the High School are working together to explore options available, but additional land would still need to be secured to facilitate this expansion. This situation remains unresolved, so yet again the draft DNP is seen to be 'premature'.
- 11.50 With regards to Early Years Education, it is reported by SCC that from September 2017 there was a deficit of 24 places, and the development numbers proposed by the Neighbourhood Plan would generate a further 12 places. The County suggests that to accommodate the pupils generated from the allocated sites, an additional early years facility would be required.

- 11.51 The capacity of local education providers is a critical strategic issue, and the wider implications must be heeded in the delivery of this Neighbourhood Plan. Consultation comments from SCC (dated 16<sup>th</sup> March 2018) clearly state that *“The current draft of the plan does not address the education issues which arise as a result of the site allocations in the plan. Local schools are currently approaching or at capacity and the plan needs to take this into account”*.
- 11.52 The inability of the draft DNP to deliver appropriate infrastructure in relation to education and school places means it fails to comply with a fundamental element of national planning policy. The NPPF (2012) (and as echoed in Paragraph 94 of NPPF 2018) is explicit in setting out the great importance that the Government attaches to ensuring that sufficient school places are available to meet the needs of existing and new communities (Paragraph 72), and calls for planning authorities to *“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.”*
- 11.53 It is clear that the County Council have sought to engage directly with Debenham Parish Council and the NPG in order to constructively assist in ensuring that the Neighbourhood Plan is effective in addressing these issues. However, the detail and advice provided by the County Council has not been included, or even reflected upon, through the draft DNP or its supporting documentation. This is a fundamental issue with the draft DNP.
- 11.54 SCC’s consultation comments (see Appendix Two) suggest that, in light of land constraints of the existing education facilities, the draft DNP should include an allocation of land (approximately 1ha) for the High School to expand and (approximately 0.1ha) for new early years provision in order to accommodate the level of development proposed through the draft DNP. Whilst assessments need to be undertaken, it is indicated that a site for a new primary school may also be required. There is no evidence that any of the sites other than that at Gracechurch Street would provide necessary provision, not just for development within the Neighbourhood Plan Area, but those in other settlements that would contribute to the school as well.
- 11.55 The draft DNP remains silent on how this will be addressed. None of the allocated sites have been tested to show how they could assist with this delivery.
- 11.56 However, the development proposed on land North of Gracechurch Street has clearly demonstrated that it would provide deliverable solutions to requirements for the village schools, informed by active discussions with both SCC Education and the High School.

- 11.57 The draft DNP states that flooding is a “*known issue*” for the village. Indeed Section 7 of the Plan is entitled ‘*We all know this village floods. How do we minimise future flooding with any further development*’ provides details in this regard. Flooding issues in the village were raised and discussed at great length in various engagement meetings that Taylor Wimpey and their consultants had with the Parish’s NPG and SCC in 2017-2018. Whilst no acknowledgement has been given to this engagement within the draft DNP or the evidence base, we are pleased to see that the Parish Council have taken on board the advice provided, albeit through simply directly cutting-and-pasting sections of text from our consultant’s Flood Risk Note of October 2017 to populate Section 7 of the draft DNP.
- 11.58 Whilst flooding appears to be a critical issue for the Parish, there is no reference made to the following national policy on flood risk, or even the existing local policies in this regard, reference to overarching flood risk policies should appear within Policy DEB 2. Whilst we do not agree with SCC’s suggestion of a Neighbourhood Plan policy that takes elements of policies already in effect, we do support their view (provided in their response letter of 16<sup>th</sup> March 2018) that the plan needs to make specific reference to national and local policy.
- 11.59 It has been demonstrated through the outline planning application for land north of Gracechurch Street that these proposals can deliver additional flood alleviation in a drainage catchment that currently has no flood alleviation facility constructed or planned (Paragraph 7.3 of the Plan highlights that no scheme exists within the Derry Brook catchment where Site SS0267 is ideally located). Furthermore the scale and location of Site SS0642 to the south of Gracechurch Street is such that an additional flood alleviation facility could be provided within the Cherry Tree Brook catchment. The smaller sites proposed for allocation would not be able to facilitate the provision of meaningful flood alleviation facilities, nor improvements to infrastructure or services that have been raised as concerns.
- 11.60 The Gracechurch Street site provide the opportunity to improve the Gracechurch Street/High Street junction whilst minimising impacts on many of the issues due to its close proximity to the High School and Primary school on routes that are walkable and with agreed mitigation to improve as necessary. Whilst the other sites will undoubtable have an impact at this location other sites will not necessarily have to contribute to any improvements. Multiple development sites will ultimately have the same cumulative impact but won’t necessarily provide an improvement.
- 11.61 The development of the site at Gracechurch Street would ensure sufficient infrastructure is made available in relation to education and flood risk, and would also provide solutions to improve highway conditions in the wider vicinity of the site, as well as facilities and contributions to serve other key services and infrastructure requirements. Smaller allocations, and the preference stated within criterion c) for schemes of up to 15 dwellings, may not be so successful in doing this.

- 11.62 As noted previously in relation to Policy DEB 1, the NPPF (2012) advocates that the supply of new homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages given the benefits that can arise from planning comprehensively and through economies of scale. The AECOM Site Assessment (December 2017) also addresses this, stating that site SS0267 north of Gracechurch Street could be more appropriate in terms of allocation capacity compared to smaller sites. Whilst the preference for existing residents may be for smaller schemes, the state of existing infrastructure and the impact of any new development need to be carefully considered when considering the future of the village, as such schemes would have critical implications on the village and its ability to achieve the delivery of 'sustainable development'.
- 11.63 Taylor Wimpey support the notion presented at criterion d) of Policy DEB 2. Through the Masterplan for proposals at Gracechurch Street (shown in Appendix One) it has been demonstrated how this can be achieved through generous areas of new landscaping to the western edges of the site, providing public open space, a new woodland belt and recreational routes to filter views of new development and create an attractive edge to respect the adjoining countryside.
- 11.64 The incorporation of good pedestrian and cycle routes within new development, and off-site, as required under criterion e) is supported and considered to be an important masterplanning principle to encourage community cohesion and mobility of new and existing residents via sustainable means. Connectivity and linkages are key to achieving good planning.
- 11.65 The NPPF is grounded on the assumption that new developments are located in areas that are able to provide people with a choice of travel modes and are able to provide safe and suitable access for all (paragraph 108). When considered against this background, it is evident that the sites at Gracechurch Street are well placed to accord with these principles. The sites are located adjacent to the existing built up area of Debenham, and consequently many day-to-day destinations that will generate travel to/from the residential areas are within close walking and cycling distance. These include the primary and secondary school; local shops; public houses; and health facilities. Pedestrian, cycle and vehicle access to the sites can be provided via Gracechurch Street. Additional pedestrian, cycle and emergency access connections can also be provided onto Butts Lane. A secondary vehicular, pedestrian and cycle access can be provided onto Low Road. It is expected that detailed analysis of the Low Road bottleneck as recommended by AECOM in considering site assessment further would yield suitable mitigation and a strategy to positively deal with these issues. This might include the relocation of facilities that generate some of the issues commented on as a cause of the bottlenecks. The draft NDP has not carried out such analysis. In addition, Taylor Wimpey have actively sought to include connections through the site, in the form of green links or corridors to provide accessibility through landscaped areas of the site to the surrounding countryside, as is detailed within the Masterplan (Appendix One).

- 11.66 Criterion g) of Policy DEB 2 restricts new housing to no more than 2 storeys. It is not evident what analysis has been undertaken to inform this, and it is considered to be overly prescriptive. Each allocation for new development, and subsequent planning application submission, should be supported by detailed landscape and visual impact assessment to fully assess the impact of new development and inform the design parameters.
- 11.67 It is not considered that the content of Policy DEB 2 fulfils the quoted 'Principal Reason for Policy'. Whilst the policy makes reference to principals of good design, it does not include specific reference to ensuring that new development is of good design quality. Furthermore, as previously noted, it is not considered that the allocations proposed through the draft neighbourhood plan are necessarily capable of meeting the needs of the community and provide adequate infrastructure. It is therefore considered that the 'Principal Reason' does not fully accord with the policy as set out.
- 11.68 The evidence supporting this policy is limited and is not considered sufficient to provide an informed and robust policy. No reference has been made to detailed comments provided by Suffolk County Council in relation to key matters such as archaeology, education, flooding, highways, transport and rights of way (see Appendix Two).

### **DEB 3 (Policy 3 – Allocation of site north of Ipswich Road for development)**

- 11.69 We object to the allocation of land (4ha) north of Ipswich Road (ref. SS0031) on the basis that the proposed allocation cannot deliver a sustainable form of development that positively meets the needs of the area (NPPF, 2012, Paragraph 14) to support a strong, vibrant and healthy community with accessible services that reflect current and future needs (NPPF, 2012, Paragraph 7), in line with the social objectives of the NPPF.
- 11.70 SCC have clearly identified that the capacity of the village education providers is a critical issue. Early Years places and the High School are already oversubscribed, and the Primary school is reaching capacity. Any new housing being delivered in Debenham, and its wider catchment, will therefore add further detriment to the capacity of the schools. As such, if additional capacity at the schools cannot be appropriately secured through land/bricks and mortar, no further new housing development can be accommodated sustainably in the village (or wider catchment). The capacity of local education providers is therefore a critical strategic issue, which needs proper and due consideration through spatial policies at a strategic (Local Plan) level, which must be ahead of the Neighbourhood Plan.
- 11.71 The inability of the draft DNP to deliver appropriate infrastructure in relation to education and school places means it fails to comply with a fundamental element of national planning policy. The NPPF (2012) is explicit in setting out the great importance that the Government attaches to ensuring that sufficient school places are available to meet the needs of existing and new communities (Paragraph 72), and calls for planning authorities to *“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 school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.”

11.72 Consultation comments from **Suffolk County Council** (dated **16th March 2018**) clearly state that *“The current draft of the plan does not address the education issues which arise as a result of the site allocations in the plan. Local schools are currently approaching or at capacity and the plan needs to take this into account”*. **The County Council’s consultation comments suggest that, in light of land constraints of the existing education facilities, the Plan should include an allocation of approximately 1ha of land for the High School to expand and approximately 0.1ha for new early years provision in order to accommodate the level of development proposed through the Neighbourhood Plan.** Whilst assessments need to be undertaken, it is apparent that a site for a new primary school may also be required. This has not been addressed through the draft DNP, and none of the sites proposed for allocation are able to viably offer a suitable site to enable the expansion of the education facilities necessary to accommodate future growth in the village and its catchment.

11.73 The site north of Ipswich Road is proposed for allocation within the draft DNP for between 60 -140 homes. It is considered that the range of houses identified is very large in its range, and the lower provision (60units) would significantly reduce the headway that DEB 1 has sought to provide. Furthermore, a site comprising homes at the lower end of this range would certainly deliver much lower contributions to infrastructure.

11.74 In the Strategic Housing Land Availability Assessment (SHLAA) (May 2016), the site north of Ipswich Road (referred to as DEB01) was assessed as being potentially suitable for delivery of approximately 100 homes in 0-5 year period, but requires further investigation regarding highways, footpaths and infrastructure required.

11.75 It is noted that when the site was later assessed through the more recent Strategic Housing and Employment Land Availability Assessment (SHELAA) (August 2017), it was discounted due to insufficient safe access to services and lack of connecting footpath.

11.76 Nevertheless, the AECOM site assessment (December 2017) provided the following analysis of the site at Ipswich Road:

- Yield of 60-140 dwellings.
- Site suitable with minor constraints.
- Avoids car bottlenecks, within walking distance of village centre, minor constraints.
- Suitability – No access at present, but easy potential for car access from Ipswich Road and potential for pedestrian and cycle access via Low Road if the site is developed alongside site SS0902.

- Accessibility - Site close to village centre, but car access would be less direct if provided only to Ipswich Road to south. However, no potential for car access via Low Road to north due to significant bottleneck along its length (narrow width of road accessing village centre and very limited potential for widening due to number of existing properties).
- Landscape and visual impact - Medium sensitivity to development and visual impact. The site is elevated which makes it more visible. The site only adjoins development on one side. There is no defensible boundary on the western edge which passes a field. Potential for this to be created as part of new development.
- Heritage considerations – close to two listed buildings and so development would have to minimise the impact of Grade II listed Malting Farmhouse and Cherry Tree Farmhouse.
- Community facilities – poorly located in relation to local amenities – development of larger sites would not have this problem as they would provide further infrastructure – 810m from services.
- Site is immediately available.

11.77 It is noted that AECOM's own site assessment (December 2017) criticises the site's poor location in relation to local amenities, despite highlighting the site as suitable through the sieving process. It is also noted that SCC commented on potential shortcomings in their consultation response (16<sup>th</sup> March 2018) that has been ignored in the preparation of the draft NDP. The distance from the school means that it is likely to generate an amount of school related traffic. This will have to enter and exit via the Low Road or Gracechurch Street "bottlenecks". Further still, the supporting text for DEB 3 (Policy 3: Allocation of site north of Ipswich Road for development) states that "*the site is well connected*". We strongly disagree with this statement when considering the reason for which it was discounted through the SHELAA (2017). In addition, although the AECOM Report states that there is "*easy potential for car access from Ipswich Road*", there is currently no sustainable transport links available near to the site to provide pedestrian and cycle connections, and as such we would question if this site could fulfil the requirements of the policy.

11.78 Pedestrian and cycle access on Low Road is stated in the AECOM Report to be potentially implemented via site SS0902 (land south of Low Road), if it is developed. Low Road is considered to be limited in terms of space for a footway on the frontage, and this small site is unlikely to be able to viably contribute improvements to this. Pedestrian crossings and bridge crossings would also be required, as well as flood mitigation, as Low Road is hindered by Flood Zones 2 and 3. The Policy wording does not take into account the risk of flooding for the site as it makes no reference to that fact that the site contains an area of Flood Zone 3 land along its edge with Low Road.

11.79 There is clearly a reliance on one site being delivered, that is dependable on another site's delivery. It is questioned if this is the correct approach a Neighbourhood Plan should be following.



11.80 Neither this site, nor the others proposed for allocation through this draft DNP provide for the education requirements that are required to be delivered. The site has not been properly tested nor evidence provided to support the fact that the site is actually deliverable.

11.81 It is our view that the sites proposed for allocation in the draft DNP, including land north of Ipswich Road, have been selected as the result of a swift and short-sighted approach to halt a single site (land at Gracechurch Street) from being brought forward. This is evident from supporting text to Policy DEB 3 titled 'Principal Reasons for Policies', which states "*To spread development across a number of sites in order to avoid and mitigate the negative impact a single large development would have on the character and infrastructure of the village*". The 'protectionist' approach that has been taken in the formation of this draft DNP does not conform with the intention of a neighbourhood plan or 'Localism' as promoted through the provisions of national planning policy and guidance. The draft DNP is therefore flawed, having been prepared on an unsound and inappropriate basis, and as such should not be submitted to the Planning Inspectorate at this stage for an independent assessment.

#### **DEB 4 (Policy 4: Allocation of site south of Low Road for Development)**

11.82 We object to the allocation of land (1ha) south of Low Road (ref. SS0902) on the basis that the proposed allocation cannot deliver a sustainable form of development that positively meets the needs of the area (NPPF, 2012, Paragraph 14) to support a strong, vibrant and healthy community with accessible services that reflect current and future needs (NPPF, 2012, Paragraph 7), in line with the social objectives of the NPPF. We would challenge this policy on the same grounds as DEB 3, in relation to the level of infrastructure improvements that such development could contribute to.

11.83 The site south of Low Road is proposed for allocation within the draft DNP for between 15-35 new homes. It is acknowledged that the NPPF encourages Neighbourhood Plans to "*consider the opportunities for allocating small and medium-sized sites [no larger than 1ha] suitable for housing in their area*" (Paragraph 69). It is also noted that both the BMSDC SHELAA (2017) and the AECOM (2017) report assessed the site as potentially suitable.

11.84 The BMSDC Strategic Housing and Employment Land Availability Assessment (SHELAA) (August 2017) assessed the site south of Low Road as follows:

- Site is considered potentially suitable subject to investigation regarding flood zone impact, landscape/townscape/historic assets impact, and transport impact on the local area.
- Site is available immediately.
- Achievable in 0-5 years.
- 24 dwelling yield.

11.85 The AECOM report (December 2017) provided the following analysis of the site south of Low Road:

- Yield of 15-35 dwellings.
- Site suitable subject to certain conditions.
- Suitability - No access at present; potential for access from Low Road to the north but given extensive traffic bottleneck given narrowness of Low Road, access here should be limited to pedestrians and cyclists; potential for car access via Ipswich Road to south if site SS0031 were also developed.
- Accessibility - Once developed the site would be reasonably accessible to/from village services and facilities on foot and by bike via Low Road, also by car via Ipswich Road.
- Environmental Designations – within Impact Risk Zone 1 of two SSSIs. Access to the north of the site (Low Road) is affected by Flood Zone 2 and 3. This would require mitigation and drainage.
- Landscape and visual impact – Low visual impact – the site is small, in the floor of a small valley, and adjoined by existing residential development on 2 sides.
- Heritage Considerations – Site is located close to Grade II listed Cherry Tree Farmhouse.
- Community Facilities and Services – Moderately located in relation to services – 640m to services.
- Site is immediately available.

11.86 Notwithstanding the assessments, and the direction within the NPPF, the site cannot be considered suitable for allocation due to its lack of deliverability.

11.87 Suffolk County Council have clearly identified that the capacity of the village education providers is a critical issue. Early Years places and the High School are already oversubscribed, and the Primary school is reaching capacity. Any new housing being delivered in Debenham, and its wider catchment, will therefore add further detriment to the capacity of the schools. As such, if additional capacity at the schools cannot be appropriately secured through land/bricks and mortar, no further new housing development can be accommodated sustainably in the village (or wider catchment). The capacity of local education providers is therefore a critical strategic issue, which needs proper and due consideration through spatial policies at a strategic (Local Plan) level, which must be ahead of the Neighbourhood Plan.

11.88 The inability of the draft Neighbourhood Plan to deliver appropriate infrastructure in relation to school places means it fails to comply with national planning policy. The NPPF (2018) is explicit in setting out the importance of ensuring that sufficient school places are available to meet the needs of existing and new communities (Paragraph 94), and calls for planning authorities to “*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 school promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.*”

11.89 Consultation comments from **Suffolk County Council** (dated **16th March 2018**) clearly state that “The current draft of the plan does not address the education issues which arise as a result of the site allocations in the plan. Local schools are currently approaching or at capacity and the plan needs to take this into account”. **The County Council’s consultation comments (16th March 2018) suggest that, in light of land constraints of the existing education facilities, the Plan should include an allocation of approximately 1ha of land for the High School to expand and approximately 0.1ha for new early years provision in order to accommodate the level of development proposed through the Neighbourhood Plan.** Whilst assessments need to be undertaken, it is apparent that a site for a new primary school may also be required. This has not been addressed through the draft Neighbourhood Plan, and **none of the sites proposed for allocation are able to viably offer a suitable site to enable the expansion of the education facilities necessary to accommodate future growth in the village and its catchment.**

11.90 Furthermore, due to significant highway and flood risk constraints, the development of land to the south of Low Road would be reliant on gaining access through the site adjoining to the south, at land north of Ipswich Road (proposed for allocation under DEB 3). As such, as similarly noted in relation to proposals for this adjoining site (Policy DEB 3), we consider development of land to the south of Low Road (SS0902) unsuitable due to these physical constraints. It is also unclear how flood mitigation strategies would be implemented given the extent of Flood Zones 2 and 3 and the requirement to make space for a Sustainable Drainage System outside of such areas susceptible to flooding. It is not evident that this site would have the land or financial means to implement the necessary infrastructure required for flood mitigation and surface water management whilst still delivering at least 15 units. The SS0902 masterplan at Appendix Four indicates 30 units but with no space allocated for SuDS or flood alleviation measures.

11.91 Highway improvements necessary to accommodate any development on land to the south of Low Road must also be noted. The County Council’s consultation comments (16th March 2018) state that the unrestricted speed limit currently in place along half the frontage to the site should be downgraded to 30mph limit, and a new footway and pedestrian crossing point would also need to be provided to facilitate appropriate pedestrian connections. This would be subject to a separate Traffic Regulation Order (TRO) which may not be supported due to the significant lack of frontage development and remoteness from the urban edge.

11.92 Advice provided by Suffolk County Council in relation to archaeological potential of the site must also be recognised. The County Council’s consultation comments (16th March 2018) note that the site is *“topographically favourably for archaeological remains, and as such archaeological field evaluations will be required prior to granting planning permission”*.

11.93 This site, nor the others proposed for allocation through this draft Neighbourhood Plan provide for the education requirements that are critically required, and cannot therefore deliver a sustainable form of development that positively meets the needs of the area. The site has not been properly tested nor evidence provided to support the fact that the site is actually deliverable.

11.94 It is our view that the sites proposed for allocation in the draft Neighbourhood Plan, including land south of Low Road, have been selected as the result of a swift and short-sighted approach to halt a single site (land at Gracechurch Street) from being brought forward. This is evident from supporting text to Policy DEB 4 titled 'Principal Reasons for Policies', which states "*To spread development across a number of sites in order to avoid and mitigate the negative impact a single large development would have on the character and infrastructure of the village*". The 'protectionist' approach that has been taken in the formation of this draft Neighbourhood Plan does not conform with the intention of a Neighbourhood Plan or 'Localism' as promoted through the provisions of national planning policy and guidance. The draft DNP is therefore flawed, having been prepared on an unsound and inappropriate basis, and as such should not be submitted to the Planning Inspectorate at this stage for an independent assessment.

#### **DEB 5 (Policy 5: Allocation of site east of Aspoll Road opposite Primary School)**

11.95 We would challenge this policy as it states that site SS0268, east of Aspoll Road, would only be developed if policies DEB 3 and 4 were successfully delivered, and depending on the scale of development provided by these and through windfall development. The delivery of the sites is therefore dependant on many factors, and we question whether it should be included in Policy DEB 1.

11.96 In the SHLAA (May 2016), the site north east of Aspoll Road (referred to as DEB(NS)03) was assessed as follows:

- Site is potentially suitable but requires further investigation regarding highways and the impact on the landscape.
- Information was unknown regarding landowner details and willingness.
- No indication of likely timescales for delivery.
- Estimate yield of 50 dwellings.

11.97 The SHELAA (August 2017) discounted the site east of Aspoll Road due to insufficient safe access to services and facilities due to lack of connected footpath.

11.98 The AECOM report (December 2017) provided the following analysis of the site East of Aspoll Road:

- Accessibility - No access on to the site but straightforward to provide it from Aspoll Road. No potential for access from Priory Lane to the east. Aspoll Road is narrow where it meets High Street, meaning there is a traffic bottleneck (same level of severity as Gracechurch Street bottleneck but less severe than Low Road bottleneck).
- Environmental Designations – Lies partially in Impact Risk Zone 1 of an SSSI and access if affected by Flood Zone 2 and 3 (Aspoll Lane).
- Landscape and Visual Impact – low sensitivity – eastern half of site is visible and flat. Western side slopes down to Aspoll Road.
- Heritage considerations – site abuts the north-eastern corner of Debenham Conservation Area and is close to Grade II listed buildings Debenham House and 50 Aspoll Road.
- Community facilities and services – moderately located in relation to facilities and services - 560m.
- Site is immediately available – this is confusing when the SHLAA did not contain details of the landowner and did not indicate timescales. The AECOM report states that the land was proposed by the landowner.

11.99 Having reviewed the AECOM analysis of the site east of Aspoll Road, it is noted that Site SS0268 was discounted because of insufficient safe access to services due to the lack of a connected footpath. The AECOM Report states that straight forward access would be provided from Aspoll Road. However, we consider that this access would be restricted by the size of the road (5.5 metres wide) and a potential extension of the 30mph limit on the site frontage. The location of the site means visibility from the site access may be difficult to achieve, particularly given the level difference between the site and the carriageway. It is noted that insufficient highway land is likely to be available to provide for pedestrian linkage in either verge. The pedestrian linkage in the western verge is adjacent to the watercourse and within the Flood Zone 3 therefore not providing safe access or egress. The vehicle access will similarly be located.

11.100 The western edge of the proposed site access also lies within Flood Zones 2 and 3 which creates an access/egress issues during times of flood. Furthermore, the AECOM Report also states that there is “*no potential for alternative access from/to Priory Lane to the east*” which could result in a failed Exception Test when making a later stage planning application.

11.101 Access within Flood Zones 2 and 3 has been a reason for site to be refused planning permission in Mid Suffolk recently and the experience of offices in considering such sites is clearly missing in the site analysis.

11.102 As noted previously, this is contrary to the advice of AECOM who suggested this important next step in the site assessment process be carried out in conjunction with officers of MSDC and SCC. The NDP has been prepared in the absence of such advice and consideration. For these reasons alone the site should be excluded.

- 11.103 There are also concerns over the proximity of the site to the Debenham Conservation Area. The development would be prominent via the northern approach to Debenham and therefore may impact negatively on its surroundings and be unwelcoming to those visiting, or those who use the Core Village.
- 11.104 The AECOM Report does not comment on the site in relation to its relationship with existing development. We consider this to be an omission and it is our view that the site is not suitable for development as it does not adjoin existing development on any of its edges, but merely at the south-western corner.
- 11.105 The High Street bottleneck is considered by AECOM to be the same severity as the Gracechurch Street bottleneck and as proven by detailed analysis supporting the planning application by Taylor Wimpey, such bottlenecks can be mitigated.
- 11.106 Whilst the Primary School is located nearby the pedestrian connectivity to it from the site is poor and as commented above unlikely to be capable of being provided.
- 11.107 Any traffic related to High School trips will have to pass through the High Street and Gracechurch Street “bottlenecks”. The relative accessibility of the site in relation to the AECOM high level assessment and arbitrary measurement to a centre of gravity means that some key facilities and generators of travel are outside of an acceptable walking distance.
- 11.108 We would also question the availability, and therefore the deliverability of the site, as the SHLAA states that landowner details and willingness were unknown. However the AECOM report states it to be immediately available. It is therefore questioned whether this site would actually pass the requirements of being ‘suitable, achievable and deliverable’.

#### **DEB 6 (Policy 6 – Consultation with the Parish Council)**

- 11.109 Taylor Wimpey support the notion being promoted through Policy DEB 6, that landowners and applicants should actively engage with the Parish Council and community. This is reflected through the active engagement Taylor Wimpey committed to consult with the Parish Council in relation to the proposals for land to the north of Gracechurch Street, and north of Low Road, including a series of meetings (details provided in Appendix Five) and provision of Masterplan (see Appendix One) and Vision Document for the sites (shown in Appendix Six), the results of which have already informed the design proposals for land to the north of Gracechurch Street. The value of pre-application engagement is acknowledged through national planning policy (NPPF 2018, Paragraphs 39 and 40) and National Planning Practice Guidance (Paragraph 001 Ref ID: 20-001-20150326).
- 11.110 Notwithstanding the above, as noted in the ‘Evidenced Supporting Policies’, the NPPF (2018) and PPG encourage, rather than stipulate the need for engagement, with the NPPF stating that Local Planning Authorities “*cannot require that a developer to engage with them before submitting a planning application*” (Paragraph 40). It is deemed that this would also be applicable to pre-application engagement with other statutory consultees and stakeholders.

11.111 It is considered that principals of Policy DEB 6 duplicate provisions already present in National Planning Policy and Guidance, but the wording of the proposed policy would not be consistent with national policy requirements.

11.112 The requirement for a Development Brief would be supported. However, it is suggested that there should be acknowledgment for greater flexibility as one approach to a specific site may not suit another. It should also be acknowledged that this would go above and beyond what is required for a normal submission for a planning application.

11.113 Part b) of the Policy also requires a traffic appraisal to form part of a development brief. We maintain that it is not considered necessary as most future planning applications for residential development in the village would be accompanied by either a transport assessment or transport statement.

11.114 Part c) of the Policy requires that a development brief would also have to demonstrate how the proposals respond to community need with respect to provision of housing for the elderly, first time buyers and those needing affordable housing. Again, we maintain that this requirement is typically addressed by supporting application documentation, including the Planning Statement and the Affordable Housing Statement.

#### **DEB 7 (Policy 7 – Sustainability)**

11.115 Whilst we agree that all proposals for new development should follow the principals of sustainable design and construction, it is considered that the provisions proposed through Policy DEB 7 could be accommodated within Policy DEB 2 as the matters relate to achieving good design in new development.

#### **DEB 8 (Policy 8 – Housing Mix)**

11.116 We agree that all new residential development should contribute to the existing and future needs of the village. We also agree that a good mix of housing types and tenures need to be provided in order to cater for the identified need of the whole community. Whilst the principal of the policy is supported, it is considered that the wording of the policy needs to be amended to ensure that new development provides a mix of house types, sizes and affordability to ensure that new developments meet local needs, as identified in housing needs surveys and housing market. This would ensure that the needs of particular groups such as families with children, older and disabled people are met, and any changing trends and requirements through the plan period can be accounted for.

11.117 The principal reason for the policy does not relate specifically to the wording of the policy and should be amended. It is suggested that the reason for the policy is to ensure that new housing developments deliver appropriate housing mix to meet local needs.

11.118 The stated 'Evidence Supporting Policies' includes 'the need to mitigate the impact of climate change' and 'the need to mitigate the risk of fuel poverty'. These are not relevant to mix of housing in new development.

### **DEB 9 (Policy 9 – Residential Car Parking)**

11.119 The policy states a minimum requirement of 2 parking spaces for 1-3 bedroom homes and 3 spaces for 4 bedrooms and above. The Suffolk Guidance for Parking (2015) states 1 space for a 1 bedroom home, 1.5 spaces for a 2 bedroom home, and 2 spaces for a three bedroom home. In this sense, the Neighbourhood Plan exceeds the requirement and we consider that this should be reduced, especially when considering that Suffolk County Council and the emerging Local Plan will refer to the Suffolk County Council parking guidance document. We note that Suffolk County Council as Highway Authority have made the same comment.

### **DEB 10 (Policy 10 – Lifetime Homes)**

11.120 Whilst we recognise that all new residential development should deliver a good mix of housing types to meet the existing and future needs of the village and provide choice in the market, neighbourhood plans do not have the provision to include policies that set technical standards for new housing. The Government made it clear in the Ministerial Statement of 25 March 2015, that *“local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings”*.

11.121 Further to this, ‘Lifetime Homes’ is no longer considered to be the relevant standard to refer to, and such matters are covered by Building Regulations Approved Document M: access to and use of buildings, volume 1: dwellings (March 2015, as amended).

11.122 Should the NPG wish to encourage developers to provide a proportion of new homes to meet accessible and adaptable standards, they should look to include reference to it within the supporting text to Policy DEB 8 (Housing Mix), supported by objective evidence to demonstrate the need.

### **Objective 2**

11.123 We agree with this objective “To ease and improve the traffic flow and parking around, and in the village”.

### *Our aims*

11.124 The aims for Objective 2 make reference to addressing the ‘pinch points’ in the village. We agree with the ‘pinch points’ identified in within the draft DNP. It should be noted that any development can only improve the situation within their abilities and in line with the scale of development proposed. Smaller scale development will only be able to offer limited improvements which will not necessarily address the cumulative impacts of multiple smaller scale developments.

### **DEB 11 (Policy 11 – Traffic flows and non-residential car parking)**



11.125 We agree with part a) that Development should identify the realistic level of traffic it is likely to generate. Part b) states “When proposals for development are considered opportunities to provide public car parking near the primary school, high school, and leisure centre will be taken, and the delivery will be secured through the planning process”. The Gracechurch Street site appears to be the only site that could deliver any additional parking and that would relate to the High Street and Leisure Centre, and address the parking at the Primary School by offering an alternative school location.

#### **DEB 12 (Policy 12 – Non-motorised networks)**

11.126 DEB 12 states “Existing footpaths and bridleways provide a high level of amenity value and will be protected. New developments should take every opportunity to enhance existing networks and provide new networks where appropriate.” We agree with this policy and consider it is important to maintain and enhance existing footpaths and bridleways.

#### *Principal Reasons for Policies*

11.127 The ‘Principal Reasons for Policies’ set out for Policies DEB 11 and DEB 12 include “ensuring new housing stock provides opportunities to reduce existing traffic problems”. Requiring new development to reduce existing problems is not appropriate or achievable. It may be that new development can seek to ensure that traffic generated by the development would not exacerbate existing issues, and/or seek to provide improvements, not least where the traffic generated would likely cause further harm. However, as noted above, any development can only improve the situation within their abilities and in line with the scale of development proposed.

#### *Evidence supporting policies*

11.128 The ‘Evidence’ set out in support of policies DEB 11 and DEB 12 is not factual evidence.

#### **Objective 3 (Policies 13-16)**

11.129 The NPPF (2012 and 2018) makes clear that the purpose of the planning system is “to contribute to the achievement of sustainable development”, and sets out that this is achieved through three overarching objectives – economic, social and environmental. It is therefore appropriate that the draft DNP includes measures to support the local economy.

11.130 It is however considered that the wording of the objective should be more rounded to ensure that the neighbourhood plan supports a strong, prosperous rural economy by proactively encouraging sustainable economic growth of existing and new businesses, and seeks to overcome barriers to investment, growth and innovation. It is considered that simply ‘supporting diversity of the local economy’ does not imply that existing businesses are offered necessary support, or how economic growth would be encouraged and supported. There appears to be a concentration on tourism related activities within the aim and Policy wording, however this is not considered to be a flexible approach, and certainly one that does not suggest ‘diversity’ in the economy

11.131 Recommendation: It is considered that the 'Principal Reason for Policy' would provide a more effective 'objective': "*to support the development of a sustainable local economy; and develop tourism initiatives*".

#### *Our aims*

11.132 The aims to Objective 3 suggest that traffic and car parking are a problem affecting the local economy. It is not considered that the draft DNP can effectively address this issue through the provisions it currently includes.

11.133 Furthermore, it is stated that "the protection and enhancement of the Neighbourhood Plan designated areas for employment area crucial to the financial sustainability of the local economy" and that the provision of land for business start-up units will be significant. It is considered that the aims are not achievable through provisions set out in the draft DNP. No land has been allocated for economic development, and no measures have been included to protect or enhance existing employment areas. In addition, these aims contradict earlier statements in the draft DNP that "this Neighbourhood Plan does not seek to determine future industry and business activity for the village" (Paragraph 3.14) and "recommends no change to the existing area of business activity" (Paragraph 3.15).

#### *Evidence supporting policy*

11.134 The 'Evidence' set out in support of policies DEB 13 is not factual evidence. Planning Policy Guidance on 'Preparing a neighbourhood plan or Order' states that "*Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan*" (Paragraph 040 Reference ID: 41-040-20160211) and that policies in a neighbourhood plan should be "*supported by appropriate evidence*" (Paragraph: 041 Reference ID: 41-041-20140306).

#### **DEB 13 (Policy 13 – Supporting Finance Sustainability)**

11.135 No comment

#### **DEB 14 (Policy 14 – Employment)**

11.136 No comment

#### **DEB 15 (Policy 15 - Broadband)**

11.137 The requirement for all new development to provide high speed broadband is supported.

#### **DEB 16 (Policy 16 - Debenham's Retail Core)**

11.138 No comment

#### **Objective 4 (Policies 17-23)**

11.139 We support the overall objective to protect and enhance the unique and special character of Debenham.

**Our aims**

11.140 We support the overall aims of Objective 4 in respecting the character of Debenham, promoting access to the surrounding countryside and providing high quality private amenity space as part of any new development. This should also be extended to include for the provision of public open space, relative to the scale of development proposed. We agree that private garden space for new houses should be of sufficient size to allow for children to play within them. However, we consider that it may not be appropriate for flatted development to include sufficient space for children's play as such spaces in flatted development tend to sit adjacent to areas of car parking. We would suggest, therefore, that the wording of the policy is amended to say that flats should be located within easy reach of a new development's areas of public open space provision in order to facilitate convenient access to both formal and informal play opportunities for children.

**DEB 17 (Policy 17 – Landscaping)**

11.141 We would broadly agree with this policy but would add the importance of retaining existing vegetation, including woodland, trees and hedgerows which contribute to the existing character of the village. We would also recommend mitigation planting is required where unavoidable loss of existing vegetation occurs.

**DEB 18 (Policy 18 – Green Spaces)**

11.142 We would agree with the identification of the these spaces as Local Green Spaces and their importance in serving Debenham in terms of both their visual appeal and health and wellbeing benefits.

**DEB 19 (Policy 19 – Gardens)**

11.143 We would agree with the importance of providing private amenity space for each new dwelling. As well as setting out the requirement for private amenity space, the policy should also stress the importance of providing public open space including access to play provision for residents.

**DEB 20 (Policy 20 – Public Realm)**

11.144 We would agree with the importance of conserving and enhancing buildings and public spaces, together with the need for such measures to promote a strong sense of place and an accessible and inclusive village. It is considered, however, that the wording of the policy should be revised to clarify whether this expectation is solely in relation to existing areas within the village or whether it also applies to new development.

**DEB 21 (Policy 21 – Conservation)**

11.145 We support a positive strategy to the conservation and enhancement of the heritage assets and the local historic environment.

**DEB 22 (Policy 22 – Views)**

11.146 We would agree with the importance of respecting key views into and out of the area. As stated above in relation to Section 5, we consider that View 5 (north of the village and east of Aspoll Road) should be assessed as being of High visual sensitivity, given that it forms the approach into Debenham Conservation Area from the north. We would also reiterate how the layout of Land north of Gracechurch Street responds to key views looking north, through the orientation of proposed public open space.

**DEB 23 (Policy 23 – Nature Conservation)**

11.147 We would agree with the need for new development to retain features of high nature conservation or landscape value. However, we feel that this policy should be strengthened to require the improvement of wildlife connectivity as being mandatory for all new development.

**Objective 5 (Policy 24)**

11.148 All new development, whether it be residential or economic development, can impact upon or require use of infrastructure. Indeed, Planning Practice Guidance (Paragraph: 045 Reference ID: 41-045-20140306 ) states that “*A qualifying body may wish to consider what infrastructure needs to be provided in their neighbourhood area alongside development such as homes, shops or offices. Infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way*”. We therefore support the inclusion of a policy relating to the provision of infrastructure through new development, but believe the objective should be more open to ensure that all forms of development contribute towards the provision of appropriate infrastructure in a timely manner.

**Our aims**

11.149 We support the aim in terms of the noting that new infrastructure is needed when development occurs. However, this is more difficult to achieve through smaller developments, and the contributions that larger scale developments could support needs to be considered.

11.150 It is noted that the PPG (Paragraph: 045 Reference ID: 41-045-20140306) suggests that when addressing infrastructure in a neighbourhood plan, the following may be important to consider:

- “what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way;
- how any additional infrastructure requirements might be delivered;
- what impact the infrastructure requirements may have on the viability of a proposal in a draft neighbourhood plan and therefore its delivery;

- what are the likely impacts of proposed site allocation options or policies on physical infrastructure and on the capacity of existing services, which could help shape decisions on the best site choices.”

11.151 It is considered that the draft DNP has failed to have true regard to any of the above points. It is evident from the lack of acknowledgement of the requirement for additional school places, and the interpretation of flooding and highway matters, that a robust, evidenced informed approach to the consideration of infrastructure requirements has not been taken in the preparation of the draft DNP.

11.152 The PPG also recommends that “qualifying bodies should engage infrastructure providers (eg utility companies, transport infrastructure providers and local health commissioners)” (Paragraph: 045 Reference ID: 41-045-20140306) in this process. On the basis of the consultation statement that accompanies the draft DNP, as well as the lack of regard for advice provided by the County Council, it is evident that this has not occurred. For further specific analysis of the consultation statement, please see Appendix Seven.

11.153 The draft DNP needs to ensure that appropriate consideration has been given to the impact that infrastructure requirements may have on viability of a proposal, particularly given that significant infrastructure requirements that are in apparent need in the village and the small scale developments that are proposed for allocation. The draft DNP is not based on robust or comprehensive assessment of the likely impacts of proposed site allocation options on physical infrastructure and on the capacity of existing services.

11.154 It is also noted that the PPG also suggests that “a qualifying body should set out in their draft neighbourhood plan the prioritised infrastructure required to address the demands of the development identified in the plan” (Paragraph: 046 Reference ID: 41-046-20140306). The draft DNP suggests that this is fulfilled by details set out in the does not do this, and considering the existing critical issues that the County Council have advised of in relation to education requirements, as well as issues of flood risk, traffic, car parking and broadband which the Parish themselves suggest are critical, it would be appropriate to include a more informed indication of what the infrastructure priorities are, so these can be effectively addressed and secured through any new development.

#### **DEB 24 (Policy 24 – Financial Contributions)**

11.155 We agree that contributions should be made for infrastructure improvements, and again, would highlight the nature and extent of contributions that larger scale developments could support relative to those that could be secured through smaller developments.

*Evidence supporting policy*

11.156 As noted above, PPG recommends that “qualifying bodies should engage infrastructure providers (eg utility companies, transport infrastructure providers and local health commissioners)” (Paragraph: 045 Reference ID: 41-045-20140306). In relation to ‘Preparing a neighbourhood plan or Order’ the PPG also states that “Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan” (Paragraph 040 Reference ID: 41-040-20160211) and that policies in a neighbourhood plan should be “supported by appropriate evidence” (Paragraph: 041 Reference ID: 41-041-20140306). The ‘evidence’ stated in relation to Policy 24 is not factual evidence and it is apparent that the draft DNP has not been informed by engagement with infrastructure providers.

## **12. SECTION 10 – ‘WHAT DID OUR COMMUNITY SAY IT WANTED IN THE FUTURE?’**

- 12.1 The ‘prioritised issues’ for leisure and recreation, housing and transport, health, education, business and the commercial sector, and the environment set out in section 10 of the draft DNP are acknowledged as a reflection of those identified through consultation with local residents in relation to their needs and desires.
- 12.2 Whilst not discrediting the contribution of existing residents, it should be recognised that these are issues, and the suggested needs of the village, are based on anecdotal, rather than factual evidence.
- 12.3 Furthermore, in setting out the ‘needs and desires’ that the NPG seek to be met through new development, consideration must be had to whether these measures can viably be achieved by the developments selected for allocation.
- 12.4 In general, Taylor Wimpey support the Key Community Actions set out at Paragraph 105. It is, however, interesting to note that whilst flooding has been cited earlier in the draft DNP as a ‘known issue’, it is not included within the list of ‘Key Community Actions’.

## **13. SECTION 11 – ‘WHAT ELSE DOES THE COMMUNITY SAY IS IMPORTANT FOR THE FUTURE OF THIS VILLAGE?’**

- 13.1 It is questioned what section 11 offers differently to that set out in section 10.
- 13.2 It is stated at Paragraph 11.1 that “residents of the village recognised the needs, and benefits of growth, but would prefer to see small scale dispersed developments”. This has to be seen as at odds with the remaining content of section 11, which details the ‘gains’ that the village wish to implement, through contributions from new development, over the plan period.
- 13.3 Paragraph 11.2 recognises that “New development can provide opportunities for relocation and co-location of both existing and future facilities. Relocation can provide opportunities for future expansion and service improvement, and for consideration of alternative uses more appropriate to the site. Co-location can provide opportunities for sharing of mutual essential assets, with car parking and shared access routes perhaps being the most significant.” There is no evidence of how this could possibly be achieved, or even viably contributed to, by the sites selected for allocation through the draft DNP. No details have been provided to demonstrate that these sites would be able to support the relocation or colocation of services, or viably provide other improvements and assets set out later in the section.
- 13.4 The draft DNP has failed to recognise the demonstrated opportunity for these to be provided and/or contributed to through development of sites at Gracechurch Street and north of Low Road. These are the only sites that have demonstrated that they can offer sufficient land for location, relocation or colocation of facilities for improvements to education, health and other community facilities, along with further assets such as flood alleviation, highway improvements, landscaped public open space, sport and recreation facilities, and new parking areas.



## **14. SECTION 12 – ‘SO WHEN MIGHT SOMETHING HAPPEN?’**

14.1 The draft DNP has not selected sites that have evidenced their deliverability, and in addition have not demonstrated their ability to deliver, or contribute to the delivery of, any of the schemes/projects listed within the table at Section 12. It is therefore considered that the actions are not achievable in the timeframes set out, or indeed in many cases achievable at all. Just two such examples a) housing need delivery (Action T.1), which, in light of the current status of selected sites, will not meet its start date of 2019; and 2) increased school roll accommodation (Action E.1) for which there is no evidence of how the proposed start date of 2019 could be met.

## 15. CONCLUSIONS

- 15.1 As has been asserted throughout these representations, having undertaken a detailed review of the draft DNP and its supporting documents, Taylor Wimpey strongly object to the draft DNP on the basis that it is contrary to national planning policy and guidance, as well as local planning policy, and the fact it fails to meet the necessary Basic Conditions.
- 15.2 The draft DNP fails properly to examine and transparently present fair and genuine options to the residents of Debenham for their consideration.
- 15.3 It is not appropriate for the Debenham Neighbourhood Plan to be 'made' at this time.
- 15.4 The Executive Summary set out in this document serves to provide the overview and conclusion to these representations.
- 15.5 However, in summary, for the reasons stated in this submission, the draft DNP as presented fails to meet the necessary Basic Conditions a), d) and e) of Paragraph 8(1)(a)(2) of Schedule 4B of the Town and Country Planning Act 1990 (inserted by the Localism Act 2011) and should not be taken forward.

# **APPENDIX ONE – LAND NORTH OF GRACECHURCH STREET ILLUSTRATIVE MASTERPLAN**







## **APPENDIX TWO – LETTER FROM SUFFOLK COUNTY COUNCIL (16TH MARCH 2018)**

Date: 16<sup>th</sup> March 2018  
Enquiries to: Cameron Clow  
Tel: 01473 260171  
Email: cameron.clow@suffolk.gov.uk



Debenham Parish Council,  
C/O Mrs Dina Bedwell,  
22 Great Harlings,  
Shotley Gate,  
Ipswich,  
IP9 1NY

Dear Mrs Dina Bedwell,

### **Pre-submission version of the Debenham Neighbourhood Plan**

Thank you for consulting Suffolk County Council on the Pre-submission version of the Debenham Neighbourhood Plan.

The County Council is not a plan making authority, except for minerals and waste. However, county councils have fundamental roles within the planning system including:

- Archaeology
- Education
- Fire and Rescue
- Flooding
- Minerals and Waste
- Natural Environment
- Rights of Way
- Transport

On 14 September 2017, Suffolk County Council published its neighbourhood planning guide to inform parishes about the roles and issues arising from these functions. Some of these issues may be addressed by the County Council's Neighbourhood Planning Guidance, which contains information relating to County Council service areas and links to other potentially helpful resources.

The guidance can be accessed here: [Suffolk County Council Neighbourhood Planning Guidance](#).

This response, as with all those comments which the County Council makes on emerging planning policies and allocations, will focus on matters relating to those services.

#### Archaeology

Consideration has been given to heritage within the village, which is welcome, however some modifications to text and policies would ensure that archaeological (below ground) heritage assets are also fully considered in the plan.

#### *History of the Village*

In paragraph 3.2, the parish Council may wish to add that the County Historic Environment Record has 250+ entries for finds and sites in the parish (see Suffolk Heritage Explorer, <https://heritage.suffolk.gov.uk/>). These range from prehistoric sites - for example the Bronze Age cremation cemetery excavated during works in the vicinity of the Cherry Tree Public House - to remains of activity during World War 2.

#### *Policy DEB 21*

In part 'e' of this policy it would be useful to add that 'heritage assets' include archaeological remains.

It is recommended that a clause 'g' is added to policy DEB 21 which sets out that those developments which affect heritage assets should disseminate information to local people about them as appropriate (e.g. public engagement for archaeological works). This would enable development to increase public awareness and appreciation of local heritage through the archaeological works that take place.

An informative note could be added about how archaeological remains should be managed in the parish. The following wording is suggested:

"Suffolk County Council Archaeological Service, as advisor to Mid Suffolk District Council, advises that there should be early consultation of the Historic Environment Record and discussion with archaeological advisors, in order to ensure that the requirements of the NPPF and Local Plan policies are met. Suffolk County Council Archaeological Service is available to give pre-application advice on the level of assessment and appropriate stages to be undertaken."

#### *Allocated Sites*

The County Council have previously commented in detail on sites for a SHLAA exercise undertaken by the district council in 2016. The recommended approach to sites is reflected in the policies (subject to considerations above), but by way of background information, if it is of interest, site specific advice is as below:

#### *DEB 02*

This site lies in an area of high topographic potential for archaeological remains, overlooking the confluence of the River Deben and one of its tributaries. A scatter of medieval artefacts is recorded to the north east (DBN 032), and medieval, roman, saxon and prehistoric finds and features to the north west (DBN 087, DBN 104, DBN 110), with prehistoric, saxon and roman scatters to the east (WNT 016, 017). Archaeological field evaluation will be required at an appropriate design stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. In this case, geophysical survey in the first instance will inform the extent and timing of trial trenching.

Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

#### *DEB 04*

This site, overlooking a tributary of the River Deben, is a site that is topographically favourable for archaeological remains. A scatter of 13th-14th century pottery is recorded from within the site (DBN 052), possibly indicative of settlement. Further scatters of medieval, late saxon and prehistoric finds are recorded to the north (DBN 040, 051, 053). Archaeological field evaluation will be required at an appropriate design stage prior to the granting of any planning permission to allow for preservation in situ, where appropriate, of any sites of importance that might be defined (and which are currently unknown) and to allow archaeological preservation or mitigation strategies to be designed. In this case, geophysical survey in the first instance will inform the extent and timing of trial trenching.

Any planning application must be supported by the results of a programme of archaeological evaluation, including appropriate fieldwork, and should demonstrate the impacts of development on archaeological remains and proposals for managing those impacts.

### *DEB 03*

We have not yet commented on the site allocated in Policy DEB 3, but it is in an area of potential above a tributary of the river, and opposite finds of Roman, Saxon and Prehistoric date. Early evaluation would be advisable and best practice.

### Education

The current draft of the plan does not address the education issues which arise as a result of site allocations in the plan. Local schools are currently approaching or at capacity and the plan needs to take this into account. Part “b” Policy DEB1 states “The scale and nature of all schemes must ensure an appropriate level of services, facilities, and infrastructure are available or provided to serve the proposed development”. This also applies to site allocations within the plan.

Details of these issues are described below. The County Council offers its support to the Debenham Parish Council in addressing these issues appropriately in the plan, and proposes actions the Plan can incorporate to help alleviate some of these issues.

### *Community Action E1*

This action should refer to the County Council, as the responsible organisation to collect the required developer contributions for education infrastructure.

### *Early Years*

Debenham Parish is part of Debenham Ward, which currently has a deficit of 24 early years places (as of September 2017). There are two providers in the ward, Debenham Roundabout Pre-School and Sir Robert Hitcham Primary Nursery. The neighbourhood plan allocations would generate a minimum of 12 children requiring early years places. If more than 200 houses were to result from the allocated sites a new early years setting would be required. The County Council recommends the plan allocates a site for early years provision. This would require 0.1 hectares of land and could be part of one of the allocated residential sites.

### *Primary School*

The current forecast for the local primary school, Sir Robert Hitcham’s CEVAP, is presented below.

| <b>Sir Robert Hitcham's CEVAP, Debenham</b> |                     |                       |                |                |                |                |                |                |
|---|---------------------|-----------------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>Permanent Capacity</b>                   | <b>95% capacity</b> | <b>Total Capacity</b> | <b>2017-18</b> | <b>2018-19</b> | <b>2019-20</b> | <b>2020-21</b> | <b>2021-22</b> | <b>2022-23</b> |
| 210   | 200                 | 200                   | 191            | 191            | 187            | 187            | 194            | N/A            |

The allocated sites in the plan would generate an estimated 28 to 66 primary school pupils and in order to accommodate this the school will need to expand from a 210 place school to a 315 place school. No feasibility work has taken place, however, discussion with the school has been undertaken to consider the practicalities involved in the options around expansion, the school is willing to work with Suffolk County Council in exploring these. Expanding the school (to 315 places for example) within its current site could remain within government guidance (Building Bulletin 103) on site area. Whilst possible, the impact (e.g. traffic, ecological and landscape) would need to be assessed but there is a fundamental question of whether its current location maximises the potential for use of sustainable transport modes into the future. These discussions would need to take place in order to determine whether the primary school could accept the growth proposed.

### *Secondary School*

The current forecast for the local secondary school, Debenham High is presented below.



| <b>Debenham High</b>      |                     |                       |                |                |                |                |                |                |
|---------------------------|---------------------|-----------------------|----------------|----------------|----------------|----------------|----------------|----------------|
| <b>Permanent Capacity</b> | <b>95% capacity</b> | <b>Total Capacity</b> | <b>2017-18</b> | <b>2018-19</b> | <b>2019-20</b> | <b>2020-21</b> | <b>2021-22</b> | <b>2022-23</b> |
| 654                       | 621                 | 621                   | 677            | 670            | 667            | 654            | 644            | 636            |

The allocated sites in the plan would generate an estimated 20 to 47 secondary school pupils. The high school has no land to develop further and, although the school already makes extensive use of the adjacent leisure centre, the area available to the school site does not include this land. This limits the ability for the school to be enlarged through a conventional extension.

Suffolk County Council are investigating enlargement options with the school and cannot provide further certainty to the likely solution or the cost. However, the school is willing to work with Suffolk County Council in exploring options to accommodate the additional pupils. Additionally, current forecasts indicate a declining role, meaning these capacity issues may be lessened as the neighbourhood plan is implemented, but this depends on the scale and phasing of further growth.

The allocation of land to expand the high school would be a positive way the plan could account for these issues. Suggest to further investigation on enlargement options, the County Council recommends allocating approximately 1 hectare for expansion of the high school in relation to the growth in the neighbourhood plan.

#### Fire and Rescue

Suffolk Fire & Rescue Service (SFRS) has considered the plan and are of the opinion that, given the level of growth proposed, additional service provision will not be needed to be made in order to mitigate the impact. However, this will be reconsidered if service conditions change. As always, SFRS would encourage the provision of automated fire suppression sprinkler systems in any new development as it not only affords enhanced life and property protection but if incorporated into the design/build stage it is extremely cost effective and efficient. SFRS will not have any objection with regard access, as long as access is in accordance with building regulation guidance. We will of course wish to have included adequate water supplies for firefighting, specific information as to the number and location can be obtained from our water officer via the normal consultation process.

#### Flooding

The plan identifies that there are flood issues within Debenham, however it needs to make specific reference to national and local policy regarding flood risk management. This is important as it does not have a flood risk management policy of its own.

National policy is outlined in paragraph 100 of the NPPF. Local policy to refer to is the Flood Risk Management Strategy produced by the Flood Risk Management Partnership and Policy CS 4 of the Mid Suffolk Core Strategy. All flood types should be accounted for, including from river or the sea (flood zones 1,2,3), surface water, ground water, and reservoirs.

The reference to the sequential test, Sustainable Drainage Systems (SuDS) and aim to reduce runoff rates (i.e. betterment) is welcome. In order for the SuDS section to be more complete, there should be reference to the hierarchy of SuDS:

1. infiltration into the ground
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.

Development should aim to be as high up this hierarchy as is practically possible.

If the Parish Council decide a flood risk policy should be added to the plan the County Council suggests the following wording as a starting point:

“Development should be directed away from areas of the highest flood risk, including risk from river or the sea, surface water, ground water, and reservoirs. Flood risk should be managed using Sustainable Drainage Systems (SuDS) and the method of discharge should be as high up the hierarchy of drainage options as is possible, once the other options have been proved not to be viable. Development is encouraged to take opportunities to reduce flood risk and create betterment.”

The County Council will be pleased to help with the Parish Council in producing an effective flood risk policy.

The County Council would also like to highlight that the allocation south of Low Road (policy DEB3) Contains an area of flood zone 3 along the edge of the site adjacent to Low Road. Reference to this should be made in policy DEB3 and require that development takes account of this risk.

### Minerals and Waste

In responding regarding minerals and waste matters the County Council will be referring to the currently adopted Minerals Core Strategy and Waste Core Strategy and the emerging Suffolk Minerals and Waste Local Plan.

#### *Minerals*

The neighbourhood plan area of Debenham is partially covered by the minerals consultation area, however this is only a small area in the south east corner of the parish which is approximately 470m away from the allocated site north of Ipswich Road (the closest allocation), it is not expected that the plan will have cause any issues regarding minerals safeguarding. There are no minerals extraction sites within the plan area.

#### *Waste*

There are no waste sites within the parish other than the Anglian Water Debenham Sewage Treatment Works, which is approximately 480m away from the allocation north of Ipswich Road. The parish may wish to seek its own advice on the distance between the treatment works and the Ipswich Road allocation.

#### *Emerging Suffolk Minerals and Waste Local Plan*

The Emerging Minerals and Waste Local Plan is expected to be adopted in 2019. No new minerals or waste sites are being proposed in the proximity of Debenham in the draft minerals and waste plan.

This new plan contains a more extensive minerals consultation area, which covers a large area of the village and covers all three of the site allocations. Minerals Policy 11 of the draft minerals and waste local plan safeguards minerals resources from development. However, it is not expected that these sites will cause a significant safeguarding issue; it is very unlikely these minerals resources would be worked as they are not of economic value due to their proximity to existing residential areas.

### Rights of Way

There are currently no references to public rights of way within the plan. It would be beneficial to add reference to these to policy DEB 11.

### Transport

There are several pinchpoints within the parish that are mentioned in the Neighbourhood Plan, such as: on street parking along the High Street, the Gracechurch street junction and the parking around the primary school. The existing street pattern and the demand for road space for different uses means that solutions to these pinchpoints need to be worked through with the local community. The County Council would welcome further discussion with the parish.

The neighbourhood plan does recognise the need to address parking through the provision of additional spaces, where new development presents an opportunity. As this would apply to the site east of Aspoll Road, a safe route from site to the school will be necessary. The plan (policy 11) also reinforces the role of the rights of way network, which supports the use of non-motorised means that could lessen the overall demand for parking. The county council would be happy to work with the parish to develop a programme of improvements to the rights of way network to support the implementation of policy 11.

The plan could seek to address the narrow Derry Brook Lane, which currently has an inadequate footway, leading to conflicts between pedestrians and vehicle traffic. This could be an opportunity to provide another pedestrian linkage to the primary school.

#### *Policy DEB 2*

The majority of the frontage on this site is an unrestricted speed limit. Should this site come forward it would be beneficial to extend the 30 miles per hour speed limit. There is no footway connecting this site to the pedestrian network of the rest of the village. It would be possible to construct a new footway and pedestrian crossing to link to the rest of the network, however this would require tree felling. Accessing the pedestrian network through the site allocated in Policy DEB3 is a possibility, however there would need to be coordination in bringing these two sites forward.

#### *DEB3*

This site would need to connect through the existing footway via a pedestrian crossing to the north side of Low Road, as there is not enough highway width to construct additional footway on the south side of the road. It is recognised that the Parish Council does not want a vehicular access onto Low Road, however, one would be possible provided the ditch along the site frontage is bridged or piped. If vehicle access to this site were to be through site allocated in DEB2 there would need to be coordination in bringing these sites forward.

The County Council would recommend allocating sites DEB2 and DEB3 as one site instead of two. If allocated separately they could come forward separately and thus would require individual infrastructure considerations (a footway connecting DEB2 to the footway network along Ipswich Road and a vehicle access onto Low Road for DEB3). Allocating them as one site would make it more likely to meet the expectations of the Parish Council and the County Council would not need to require an additional road access for DEB3 or an additional footway for DEB2 at the planning application stage. However, if more than 150 homes were proposed on this combined site, an additional vehicle access may be required as an emergency access. This is outlined in the Suffolk design guide.<sup>i</sup>

#### *Policy DEB4*

Half of the frontage on this site is an unrestricted speed limit. Should this site come forward it would be beneficial to extend the 30 miles per hour speed limit. A new footway and pedestrian crossing point would need to be constructed to connect this site to the existing pedestrian network.

#### *Policy DEB8*

This policy is not in line with the Suffolk Guidance for Parking (2015), which has been adopted by Babergh and Mid Suffolk District Councils.<sup>ii</sup> It is recommended that the plan makes reference to this guidance.

#### General Comments

The following comments are not specific to Suffolk County Councils areas of responsibility, however they might be helpful to make the policies within the plan more effective.

#### *Policy DEB 1*

Part “c” of this policy states that “The community at the moment strongly prefers smaller development schemes up to 15 units. Larger schemes must demonstrate that they will generate wider community benefits to the village over and above that are required in b) above.”

This limitation could present a challenge for the delivery of community infrastructure. Whilst the Community Infrastructure Levy (CIL) provides an income source, smaller sites do not provide opportunities to incorporate the provision of community infrastructure, such as early years settings. The County Council understands that community benefits from development are desirable, but the achievement of community benefits should be inline with the NPPF and financial contributions to infrastructure cannot be sought which are to be funded through CIL. National Planning Policy Guidance states that “Planning obligations should not be sought where they are clearly not necessary to make the development acceptable in planning terms.” There is the potential for development to achieve policy objectives. The text of the plan can encourage developers to work with the community in order to provide wider benefits to the community.

#### *Policy DEB 4*

This policy does not specify the site number, like other site allocation policies do. So that the policy is specific about which site it is allocating it should add the site number to the policy as shown on map 4.

#### *Policy DEB 9*

The County Council understands the need and desire for homes that can be adapted as people’s needs and capabilities change and encourage this wherever possible. Unfortunately, a neighbourhood plan is not able to set this out in policy and Lifetime Homes is no longer the up to date standard to refer to; the current standard is building standard M4(2) Accessible and Adaptable Dwellings.

The Government’s position on the relationship between planning policies, building regulations and Lifetime Homes was set out on 25 March 2015 through a Ministerial Statement<sup>iii</sup> confirming that the optional requirements would be introduced and that:

“plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings” [...]

and

“neighbourhood plans should not be used to apply the new national technical standards.”

While the neighbourhood plan cannot set out a proportion of homes that meet the accessible and adaptable standards in policy, it can encourage developers to do so in the text of the plan and the County Council would encourage the Parish Council to do this.

#### *Policy DEB 13*

Part ‘a’ of this policy refers to a proposals map, however nothing in the plan has been labelled as such. In order for this to be effective the proposals map must be clearly labelled.

#### *Community Actions*

The desire of the parish to work with the County Council regarding traffic and public transport is noted and welcome. The County Council can also contribute to the Health theme of the community actions, through enhancing the Public Rights of Way Network, which provides access to the countryside.

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I hope that these comments are helpful. The County Council is always willing to discuss issues or queries you may have.

If there is anything I have raised you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Cameron Clow  
Planning Officer  
Resource Management

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<sup>i</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/>

<sup>ii</sup> <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>

<sup>iii</sup> <https://www.gov.uk/government/speeches/planning-update-march-2015>

## **APPENDIX THREE – DEBENHAM NEIGHBOURHOOD PLAN PRESENTATION (JANUARY 2018)**





## The Issues

Debenham is facing unprecedented change. Central government and Mid Suffolk District Council require villages like Debenham to accommodate more housing.

The current system is dependent on:

1. Landowners responding to the call for land for development
2. Landowners doing independent deals with developers, who could then vigorously seek planning approvals in advance of the community's wishes being expressed in a Neighbourhood Plan.

In response to MSDC's "call for development sites" 7 major sites have been proposed for development in Debenham. On one of these sites, land north of Gracechurch St, an outline planning application has recently been submitted.







# Community Concerns

The challenge for Debenham is how can we accommodate more housing whilst maintaining the special character of the village, and ensuring any new development properly meets the needs of the village.

The three primary concerns residents have expressed with any village development are:

1. The impact on Traffic, Parking, Flooding and general Infrastructure
2. Appropriate provision of affordable housing
3. Diminution of the character, beauty, tranquility and social cohesion of the community





# How have these issues and concerns been addressed?

The Parish Council and Neighbourhood Plan Committee have prepared the Debenham Neighbourhood Plan which takes into account all issues and concerns and proposes practical solutions to address them.

The Neighbourhood Plan needs the endorsement of the residents for it to be effective.

All residents need to make their views known directly to MSDC on any planning application.



# Neighbourhood Plan – In Brief

What it is

What it  
Proposes

How it is  
used



# Neighbourhood Plan – What it is

- A Neighbourhood Plan sets out the community wishes and desires, and proposes planning policies for the use and development of land.
- The Plan guides and steers development to the most appropriate sites. Its policies cover local issues such as the type, design, location and mix of housing that the village requires. Policies also cover issues such as flooding, traffic congestion, which green spaces should be protected and what landscaping is required in and around new development.
- Once the Neighbourhood Plan has been adopted, it will form part of the statutory planning framework for the area and the policies and proposals contained within it will be used as a basis for the determination of planning applications, alongside the District Local Plan.



# Neighbourhood Plan – What it proposes

- These sites, SS0031, SS0902 and SS0268, developed in sequence, could provide the housing requirement for the village between 2016 and 2036, whilst minimising the impact of traffic flows, and flooding.
- Site SS0268 to be developed only if there is proven unmet housing need following the successful development of sites SS0031 and SS0902.
- Together these sites could deliver between 112 and 262 new dwellings, which will provide some flexibility for accommodating changing housing requirements during the Plan period.
- These sites provide full conformance to the requirements of the emerging Mid Suffolk Local Plan.





SS0268

SS0902

SS0031



# Neighbourhood Plan – How it is used.

- Once the Neighbourhood Plan is adopted, it becomes part of the statutory decision making process.
- The Neighbourhood Plan is one method of influencing development in the area, it is vitally important that all residents also comment directly to Mid Suffolk District Council on all planning applications





# What are we up against?

- Central Government and Mid Suffolk District Council have committed to the provision of new housing.
- The current draft Neighbourhood Plan has not yet been adopted and is therefore deemed to be an emerging plan, and consequently does not carry as much weight as a fully adopted plan. It is **vital** that the draft plan is approved by the residents to enable it to be adopted as soon as possible.
- Developers are more vigorous in pursuing their own applications where a Neighbourhood Plan has not yet been adopted.



# Planning Applications - Your Views & Why they Count

- In assessing planning applications the local council must take into consideration the views, comments and objections of the residents. In order to be valid any objections must be based on the criteria established within the planning application and the issues affected by them.
- The more comments and objections that are received from individual residents, the greater the weight they have in the decision making process.
- It is therefore crucial that every adult resident registers their own individual comments and objections in accordance with the procedure as published.





**Proposed New Development**

**Leisure  
Centre**

**School**





Variied building line and orientation to create a sensitive countryside edge, with lower density housing located in the peripheral areas of the Site

Proposed green corridors enhanced by tree planting and amenity spaces will frame views of the surrounding area, as well as connecting the Site's public open spaces and creating opportunities for informal recreation

Proposed new landscaped area to include amenity space, a new woodland belt and recreational routes to filter views of the development and to create an attractive edge to respect the adjoining countryside

Potential location for SuDS features to be located at the low points of the Site. An area of the SuDS feature will be permanently wet to create a wetland habitat to attract Great Crested newts and other wildlife.

Location of children's play area ensures all new homes are within the required walking distance

Road crossings designed to give pedestrian priority

Derybrook Farm

SuDS Basin A

Flood Alleviation Feature

SuDS Basin B

Potential Primary School Site or Community/Car Use

Opportunity to reinforce boundary vegetation to create a landscaped edge

Potential vehicular access onto Gracechurch Street

Debenham Church of England High School

Proposed area to provide a focal point to the development. This could include a LEAP and amenity spaces which would form a connection from the development to the Leisure Centre and High School on the opposite side of the road

Potential vehicular access onto Gracechurch Street

- Debenham Leisure Centre
- Debenham Bowls Club
- Community Centre
- Forge Community Church
- Indian Takeaway

Proposed green gateway into Debenham could consist of a community orchard to reflect the prevalence of orchards to the north of Debenham.

New woodland belt to create a robust boundary to the development and to link the existing landscaping



# Action – Taylor Wimpey Application

## Key Points for Submitting your Comments

- The adverse impact of the proposed development would significantly outweigh any benefits. There would be:
  - a high negative visual impact on a valued and sensitive landscape
  - a negative impact on traffic flows along Gracechurch Street and the High Street.
  - increase the risk of flooding
- The scale of development would fundamentally alter the character and nature of the village.
- The development is not sustainable. There is a high level of commuting from Debenham to jobs in other locations, and such a significant increase in houses is not matched by the number of jobs within the area.
- Houses still for sale - no demand for a development of such a scale in the area.
- Pedestrian safety would be severely compromised - particularly along Gracechurch Street.
- There are far more suitable sites allocated within the Neighbourhood Plan which address all of the above issues and delivers the housing numbers required in MSDC emerging Local plan.



# Neighbourhood Plan – Your Views & Why they Count

- The Neighbourhood Plan cannot be adopted without the endorsement of the residents.





# What weight can be given to an emerging neighbourhood plan?

S216 National Planning Guidance states: “From the day of publication, decision makers may also give weight to relevant policies in emerging plans”.

Debenham’s Neighbourhood Plan has been prepared following extensive community consultation, advice from independent planning and Neighbourhood Plan experts and its policies accord with National Planning Policies. Hence MSDC decision makers can be requested to carefully consider and give weight to the site allocation policies in Debenham’s Neighbourhood Plan.



# What do independent experts think of the site that Taylor Wimpey wish to develop?

AECOM Infrastructure and Environment UK, a national company with a high reputation, were commissioned by Debenham Parish Council to undertake an independent assessment of the suitability for development of the competing sites in Debenham.

AECOM's assessment was that the site north of Gracechurch Street proposed by Taylor Wimpey was not suitable for development for a variety of reasons, including that there would be significant negative traffic impacts, and the scale of development would have a high negative visual impact.





## Action – Neighbourhood Plan

It is vital that you submit your comments on the Neighbourhood Plan as soon as possible by:

- Completing the online form on the Parish Council Neighbourhood Plan website ([www.debenhamnp.onesuffolk.net](http://www.debenhamnp.onesuffolk.net))
- Completing the Questionnaire available at this meeting and from Webster's newsagent.
- By direct email to: [NPfeedback@debenhampc.org.uk](mailto:NPfeedback@debenhampc.org.uk)

The deadline for submission of comments is the 16<sup>th</sup> March 2018. However, the sooner we have your comments, the sooner it can be progressed to the next stage of adoption.

Completed questionnaires outside of this meeting should be taken to Webster's newsagent.



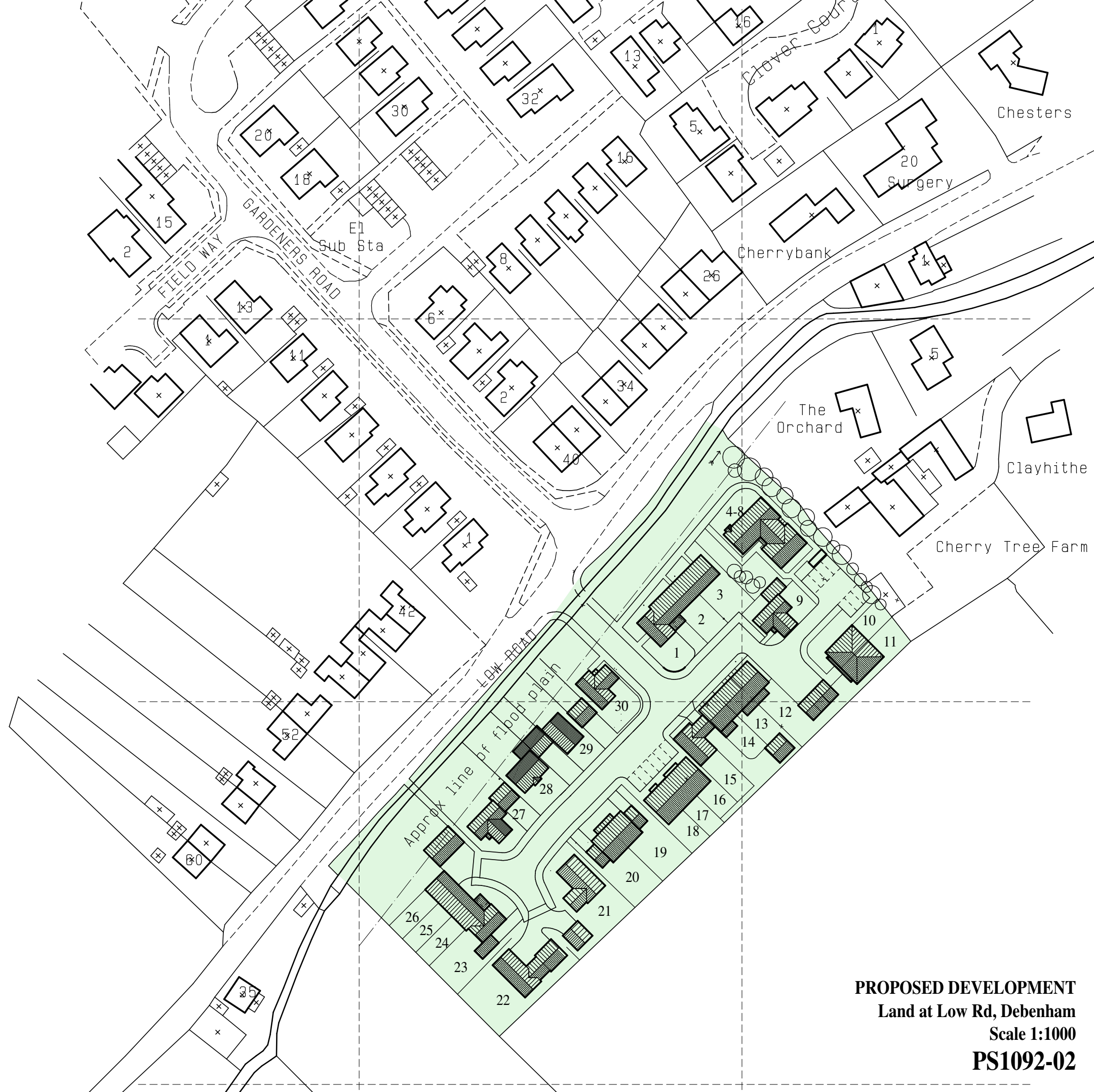
## Action – Next Steps

- Submit your comments on the Taylor Wimpey development as soon as possible. They can be provided both online or in writing, **but must be received no later than the 1<sup>st</sup> February 2018.**
- Complete the Neighbourhood Plan questionnaire

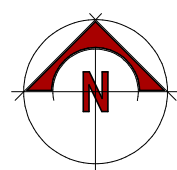
Copies of these slides will be available to download from the Parish Council Neighbourhood Plan website ([www.debenhamnp.onesuffolk.net](http://www.debenhamnp.onesuffolk.net))

## **APPENDIX FOUR – PLAN ILLUSTRATING PROPOSED DEVELOPMENT OF 30 DWELLINGS AT LAND TO THE SOUTH OF LOW ROAD**

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dimensions. Any discrepancies should be referred  
to the Architect immediately.



**PROPOSED DEVELOPMENT**  
**Land at Low Rd, Debenham**  
**Scale 1:1000**  
**PS1092-02**



Patrick Allen Ltd.  
2 Grange Business Centre  
Tommy Flowers Drive  
Grange Farm, Kesgrave  
Ipswich, Suffolk, IP5 2BY

Tel: 01473 620660  
Fax: 01473 620627  
Mobile: 07850 911054  
Email: [architects@patrickallenriba.f9.co.uk](mailto:architects@patrickallenriba.f9.co.uk)

**Patrick Allen Ltd**  
**ARCHITECTS**

## **APPENDIX FIVE – CONSIDERATION OF DNP TIMELINE AND SCI EXTRACT**

## DNP Timeline

| Date           | Actions   |
|----------------|---|
| Sept 2012      | <ul style="list-style-type: none"> <li>• PC approves Strategic Planning Process principle</li> <li>• Research into previous Village Appraisal.</li> </ul>   |
| Feb 2014       | <ul style="list-style-type: none"> <li>• PC approves a strategic planning process and agrees to the production of a Neighbourhood Plan. (NP).</li> <li>• Research undertaken into other NPs.</li> <li>• Advice sought from MSDC.</li> <li>• Attendance at NP seminars.</li> <li>• PC establishes the NP Committee with delegated authority and budget.</li> </ul>   |
| Jun 2014       | <ul style="list-style-type: none"> <li>• Two Public Meetings held at DLC and Coopersfield.</li> <li>• General comment and invitation cards delivered to all households.</li> <li>• Letters delivered to all businesses.</li> <li>• Local organisations, clubs and societies visited to explain NP.</li> </ul>   |
| July 2014      | <ul style="list-style-type: none"> <li>• PC establishes NP Steering Committee.</li> </ul>   |
| Aug 2014       | <ul style="list-style-type: none"> <li>• Press campaign in Diss Express and EADT.</li> </ul>  |
| Sept 2014      | <ul style="list-style-type: none"> <li>• In association with Community Action Suffolk and MSDC, a housing needs survey undertaken.</li> <li>• Parish boundary approved by MSDC as 'defined area'.</li> <li>• Locality budget secured.</li> <li>• Discussions held with neighbouring parishes.</li> <li>• Initial analysis completed from public meetings and comment cards.</li> <li>• Draft vision approved as working title.</li> <li>• Six themes identified...Planning &amp; Housing, Leisure &amp; Recreation, Education &amp; Health, Business &amp; Commercial and Environment &amp; Transport.</li> <li>• Six theme groups established including key personnel from the village.</li> </ul> |
| Jan – Jun 2015 | <ul style="list-style-type: none"> <li>• Meetings with other NP groups across Suffolk, Planning staff at MSDC, potential consultants,</li> </ul>  |

|                     |   |
|---------------------|---|
|                     | <p>Lavenham, Rendlesham and Mendlesham reps.</p> <ul style="list-style-type: none"> <li>• Meetings with schools to explain NP process.</li> </ul>   |
| Sept 2015           | <ul style="list-style-type: none"> <li>• Three online surveys created, for residents, the youth and businesses.</li> </ul>  |
| Nov 2015            | <ul style="list-style-type: none"> <li>• Surveys launched, and extended to 31/01/16.</li> </ul>   |
| Dec 2015            | <ul style="list-style-type: none"> <li>• Leaflet drop to all households encouraging participation in surveys.</li> <li>• Hard copies of survey sent out to household requests.</li> </ul>   |
| Feb – April 2015    | <ul style="list-style-type: none"> <li>• Analysis of surveys undertaken.</li> <li>• Since the establishment of the NP Committee and Steering Group, there have been 12 meetings together with approximately 18 theme group meetings.</li> </ul>       |
| Jun – Sept 2015     | <ul style="list-style-type: none"> <li>• Six meetings with MSDC reps, and Critical Friend.</li> </ul>   |
| Oct 2016            | <ul style="list-style-type: none"> <li>• First draft Neighbourhood Plan developed.</li> </ul>   |
| Nov 2016 – Jan 2017 | <ul style="list-style-type: none"> <li>• Further drafts developed.</li> </ul>   |
| Jan 2017            | <ul style="list-style-type: none"> <li>• Meeting with Critical Friend to refine policies.</li> <li>• Appointment of Planning Consultant to report on emerging Plan. Consultant reviews draft</li> <li>• Plan with recommendations.</li> </ul>         |
| Feb – May 2017      | <ul style="list-style-type: none"> <li>• Further drafts of NP created.</li> </ul>   |
| June 2017           | <ul style="list-style-type: none"> <li>• Meetings with Consultant, Critical Friend, and MSDC. Parish Council debates Draft Neighbourhood Plan.</li> </ul>   |
| July 2017           | <ul style="list-style-type: none"> <li>• Parish Council posts draft Plan on website.</li> </ul>   |
| Sept 2017           | <ul style="list-style-type: none"> <li>• Parish council secures Locality funding to undertake site assessments.</li> </ul>  |
| Oct 2017            | <ul style="list-style-type: none"> <li>• AECOM draft report on sites' suitability</li> <li>• Received, approved by PC.</li> </ul>   |
| Nov 2017            | <ul style="list-style-type: none"> <li>• PC approve version 31 Draft NP, for further Informal discussion with consultant and MSDC. Approval also given for the establishment of sub committee to manage consultation period in early 2018.</li> </ul> |
| Dec 2017            | <ul style="list-style-type: none"> <li>• Published the final draft NP on the Parish Council website, together with supporting Reports.</li> </ul>   |

**Taylor Wimpey's Engagement with the Parish Council**

Meeting with Debenham Parish Council (DPC) on 31/07/2017.

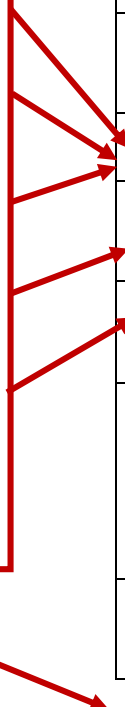
'Critical Friend' Revision of Draft DNP August (2017).

Meeting with Debenham Parish Council (DPC) on 31/08/2017.

Meeting with Debenham Parish Council (DPC) on 21/09/2017.

Meeting with Debenham Parish Council (DPC) on 05/10/2017.

Provision of wording for 'Flooding Section' on June 2018.



## 2. STAKEHOLDER CONSULTATION

### 2.1 CONSULTATION PROGRAMME

**2.1.1** The Applicant believes it is important to engage with all local stakeholders, in line with the Government's *Localism Act 2011* and the *National Planning Policy Framework 2012*.

**2.1.2** Effective and genuine community consultation has been of paramount importance to the Applicant and engagement took place throughout the pre-application phase of the planning process. This commitment is reflected in the table below, which details the efforts to engage with local residents, elected representatives and community groups, as well as District and County Council officers.

| ACTIVITY  | DATE                            |
|---|---------------------------------|
| Meeting with officers from Babergh Mid Suffolk District Council | 24 <sup>TH</sup> February 2017  |
| Meeting with officers from Babergh Mid Suffolk District Council | 13 <sup>th</sup> March 2017     |
| Meeting with officers from Babergh Mid Suffolk District Council | 16 <sup>th</sup> May 2017       |
| Meeting with Cllr Kathie Guthrie                                | 3 <sup>rd</sup> July 2017       |
| Meeting with Debenham Parish Council (Neighbourhood Plan Group) | 31 <sup>st</sup> July 2017      |
| Meeting with Debenham Parish Council (Neighbourhood Plan Group) | 31 <sup>st</sup> August 2017    |
| Meeting with Debenham Parish Council (Neighbourhood Plan Group) | 21 <sup>st</sup> September 2017 |
| Meeting with officers from Babergh Mid Suffolk District Council | 22 <sup>nd</sup> September 2017 |
| Meeting with Debenham Parish Council (Neighbourhood Plan Group) | 5 <sup>th</sup> October 2017    |
| Meeting with officers from Babergh Mid Suffolk District Council | 31 <sup>st</sup> October 2017   |
| Meeting with officers from Babergh Mid Suffolk District Council | 8 <sup>th</sup> November 2017   |
| Meeting with of Debenham High School and Primary School         | 14 <sup>th</sup> November 2017  |
| iPad Canvassing   | 18 <sup>th</sup> November 2017  |
| Leaflet Delivery to Debenham Residents                          | December 2018                   |
| Meeting with Cllr Kathie Guthrie                                | 30 <sup>th</sup> November 2017  |



## **APPENDIX SIX – LAND OFF GRACECHURCH STREET VISION DOCUMENT**

# VISION DOCUMENT

LIVE DOCUMENT

## LAND NORTH AND SOUTH OF GRACECHURCH STREET, DEBENHAM

NOVEMBER 2017



**Taylor  
Wimpey**

Prepared by:



**Office Address:**

CSA Environmental  
Dixie's Barns, High Street, Ashwell, Hertfordshire, SG7 5NT

**Office Telephone Number:**

01462 743 647

On behalf of:

Taylor Wimpey UK Ltd



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|                   | Date:      | Prepared by: | Authorised by: | File reference: |
|-------------------|------------|--------------|----------------|-----------------|
| First Issue_DRAFT | 03/10/2017 | RR/JC        | RR             | 3219_02_DRAFT   |
| Second Issue      | 08/11/2017 | RR/JC        | RR             | 3219_02_A       |
| Third Issue       | 10/11/17   | RR/JC        | RR             | 3219_02_B       |
|                   |            |              |                |                 |



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## VISION STATEMENT

## TEAM

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Taylor Wimpey UK Ltd



Boyer (Planning Consultant)



CSA Environmental (Masterplanning and Landscape)



Cannon Consulting Engineers (Highways and Drainage)



James Blake Associates (Ecology)

## PREFACE

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This Vision Document promotes the development potential for the land to the north and south of Gracechurch Street in Debenham. It demonstrates how this land could be brought forward as a comprehensively planned development to deliver a high quality, exciting and sustainable new neighbourhood for approximately 640 new homes and substantial new areas of green infrastructure, which will include new landscaping, children's play areas and new routes for walking and cycling.

It also demonstrates how the new development could deliver a comprehensive package of traffic initiatives and improvements for the village, including the provision of a link between Gracechurch Street and Low Road that will help to alleviate existing traffic problems along High Street and Aspoll Road.

This is considered to be a 'live' document which will be updated to support the emerging allocation of this site, alongside the adjoining allocation.

An important element of the document is the explanation of the of how the development of the Site will deliver a flood alleviation basin which will complete the wider flood alleviation networks being put in place around the village.

# 01. INTRODUCTION

*This Vision Document for the land to the north and south of Gracechurch Street in Debenham (“the Sites”) has been prepared on behalf of Taylor Wimpey UK Ltd to support their representations to the new Babergh and Mid Suffolk Joint Local Plan.*

The aim of this document is to articulate the development potential of the Sites and to demonstrate the opportunity it provides to deliver sustainable growth to for a core Village to help meet Babergh and Mid Suffolk’s housing needs during the merging plan period to 2036.

The document seeks to cover the following:

- Planning Policy Context – a broad summary of the strategic development opportunities and the need for development across Babergh and Mid Suffolk.
- Site and Surroundings Assessment.
- Technical Considerations, including accessibility, landscape, ecology, and flood risk and drainage.
- Development Principles – summary of the principal constraints and opportunities and how these have translated into the development proposals for the Sites.

## The Delivery Framework

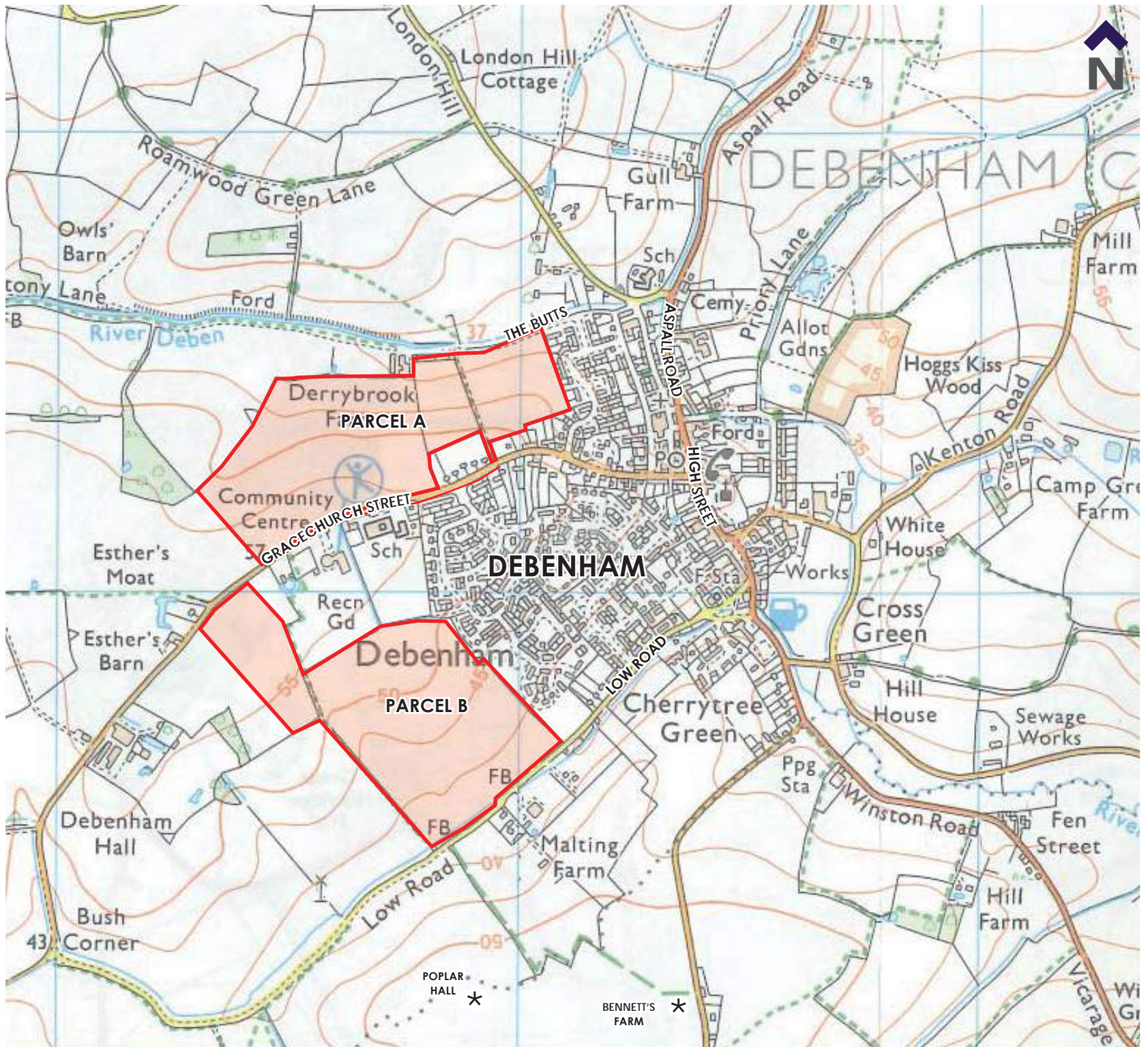
It should be noted that the proposals set out in this document represent 'work in progress'. They will continue to be refined and informed by ongoing and further technical work being carried out by Taylor Wimpey’s appointed team of specialist consultants, who have extensive experience in the promotion of sustainable new developments through the Local Plan process, and through consultation with key stakeholders, the Council and importantly, the local community.

Whilst this document can be read on its own, it is supported by a range of technical assessments and reports which have informed the understanding of the Sites and its development potential.

It is intended that the submission of this Vision Document, will assist the Council in making further choices as part of the next stages of the Local Plan process.



Figure 1.1: Site Location Plan.





## 02. PLANNING CONSIDERATIONS

### 2.1 PLANNING POLICY CONTEXT

#### National Planning Policy Framework

The Framework provides the over-arching context for the preparation of development plans and consideration of the future use of the Sites.

The allocation of the Sites for housing development would comply with the key objectives of the Framework as outlined below.

#### Promoting Sustainable Development

The presumption in favour of sustainable development is central to the Framework's policy approach. In promoting sustainable development in the plan-making process, local planning authorities are required to positively seek opportunities to meet the development needs of their area (paragraph 14, NPPF).

Local Plans are the key to delivering sustainable development and should be prepared with that objective in mind. To that end, they should be consistent with the principles and policies set out in the Framework (paragraphs 150 and 151).

The 12 Core Planning Principles which underpin plan-making and decision taking within the planning process are set out in paragraph 17 of the Framework. In particular, planning should:

- Not simply be about scrutiny, but be a creative exercise finding ways to enhance and improve places;
- Proactively drive and support sustainable economic development to deliver the homes, development and places the country needs;
- Take account of the different roles and character of areas, protecting the Green Belts and recognising the intrinsic character and beauty of the countryside; and
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

It is clear from the Framework that the Government is committed to ensuring that the planning system does everything it can to support sustainable growth and significant weight should be placed on that objective through the planning system.

#### Sustainable Transport

Section 4 of the Framework highlights the important roles transport policies have in facilitating sustainable development and also in contributing to wider sustainability and health objectives. Paragraph 29 states:

*"The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel"*

Paragraph 30 emphasises that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

Furthermore, plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised (Paragraph 34).

#### Housing

Section 6 of the Framework emphasises the requirement for local planning authorities to "boost significantly the supply of housing". To achieve this LPA's should:

- Use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for the market and affordable housing in the housing market area – recent case law makes clear that this is the starting point for assessing the housing requirement before any 'policy on' constraints are applied.
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer to ensure choice and competition in the market for land (paragraph 47).

#### Plan Making

Local Plans should be 'sound', meaning that they should be positively prepared, justified, effective and consistent with national policy (paragraph 182).

## 2.2 LOCAL PLANNING POLICY CONTEXT

The key policy documents of Mid Suffolk District Council's (MSDC) adopted Development Plan currently comprise:

- Adopted Mid Suffolk Core Strategy (2008);
- Mid Suffolk Core Strategy Focussed Review (2012);
- The 'saved' policies of The Mid Suffolk Local Plan (1998);
- Social Infrastructure, including Open Space, Sport and Recreation SPD (2006); and,
- Babergh and Mid Suffolk Joint Landscape Guidance (2015).

### Adopted Mid Suffolk Core Strategy (2008) and Focused Review (2012)

In line with National Planning Policy, the strategic objectives of the Core Strategy focus on the achievement of sustainable development, recognising the relationship between the delivery of growth and infrastructure to accommodate new development and support balanced, inclusive and prosperous communities. To accord with MSDC's approach to sustainable development, proposals for new development must demonstrate the principles of sustainable development, respect the local character of different parts of the District and how it addresses the context and key issues of the District.

Debenham is identified within the Core Strategy as a Key Service Centre due to the size of the settlement and the level of services and amenities available. The Core Strategy's settlement hierarchy directs the main focus of development to Key Service Centres, in addition to the District's three market towns. Key Service Centres are identified as having "the potential to accommodate development which is sympathetic to local character and of an appropriate scale and nature in relation to local housing and employment needs." The Core Strategy recognises that there is a need to release further green field sites for housing, as extensions to urban areas, if housing growth is to be maintained or increased.

Policies of the Core Strategy require the delivery of appropriate and accessible infrastructure to meet the justifiable needs of new development, and for new housing development to provide a mix of house types, sizes and affordability to cater for different accommodation needs.

### The Saved Policies of the Mid Suffolk Local Plan (1998)

Local Plan policies currently remain as 'saved policies' in the planning decision making process, but the weight afforded to these depends on the degree to which they accord with the NPPF.

The land to the north of Gracechurch Street, Debenham is not subject to any formal designation or direct policies within the Local Plan. There are various policies, however, that remain applicable to the proposed development, including policies relating to the protection of 'visually important open spaces', housing, heritage, design, transport, countryside, and recreation.

### Social Infrastructure, including Open Space, Sport and Recreation SPD (2006)

MSDC advocates that the provision of community facilities, open space and facilities for sport and recreation helps to underpin people's quality of life within the District. To this end, new development is required to deliver on site provision, or capital contributions to provision or upgrading of off-site facilities. Such provision would be in the form of play areas, outdoor pitches, informal recreation space, village halls, sports halls and swimming pools.

### Babergh and Mid Suffolk Joint Landscape Guidance (2015)

The Joint Landscape Guidance seeks to safeguard the character of the Districts' countryside and ensure new development integrates positively with the existing character. The guidance sets out that when considering development proposals in the countryside, account should be taken of the potential impact of new development in both immediate and distant views, particularly from roads, public footpaths and settlements. New development should be carefully sited to ensure the best fit with the landscape and to minimise its impact on the appearance of the landscape, and special attention should be given to the siting, scale, design, materials, landscaping and general appearance of any new development in the countryside or on the edge of settlements so that its impact upon the character of the landscape is minimised.

## 2.3 EMERGING LOCAL PLANNING POLICY

### Babergh & Mid Suffolk Joint Local Plan

Whilst remaining as two distinct Councils, Babergh and Mid Suffolk District Councils (BMSDC) have been developing an agreed process of integrating services over recent years. With aligned visions and strategic priorities including a shared focus on the planning and delivery of sustainable growth, it was agreed by members of both Councils in 2013 that a single planning policy framework would be produced for the future of the Districts. In August 2017 BMSDC published their Draft Joint Local Plan (Pre-submission Regulation 18 stage) Document for consultation.

The consultation document notes that the new Joint Local Plan needs to set a spatial vision of the type of place that Babergh and Mid Suffolk will become by 2036, and suggests that this will be based upon the following key priority areas:

- Housing
- The Economy
- The Environment
- Healthy Communities & Infrastructure.

As a starting point for determining the housing need figure across the District, the consultation document suggests that there is an Objectively Assessed Need (2014 – 2036) of 9,951 dwellings in Mid Suffolk (452 dwellings per annum). Given the shortfall in BMSDCs existing housing land supplies, the prudence of allocating contingency sites is also recognised to provide a degree of certainty that the requirement will be met if original allocations are substantively delayed or not progressed.

With the services and facilities available in Debenham, the settlement has been identified as a 'Core Village', the highest ranking for settlements outside of the Ipswich Fringe Area, urban areas and market towns. Through this ranking, the emerging hierarchy recognises that Debenham is capable of supporting growth.

### Site Promotion

The land at Debenham was promoted through the Mid Suffolk 'Call for Sites' in 2016 (ref. SS0267 and SS0642) and the land to the north of Gracechurch Street was identified within the Joint Babergh Mid Suffolk SHLAA (May 2016) as being a potentially suitable site for residential development.

In exploring the potential for development of the sites at Debenham, Taylor Wimpey has accordingly engaged with Planning Officers and Members at Babergh Mid Suffolk District Council, Suffolk County Council, as well as with the Parish Council. The ongoing discussions have informed consideration of key characteristics, issues and opportunities for the village and the site itself, which has helped to inform the ongoing evolution of the masterplan.

### Neighbourhood Plan

Following designation of a Neighbourhood Plan Area in 2014, Debenham Parish Council have been progressing the preparation of a draft Neighbourhood Development Plan (NDP) covering the period to 2036, to align with the emerging Joint Local Plan. An initial draft of the NDP was published in August 2017, and identified the following Key Community Issues:

- a) Appropriate housing growth and environmental development.
- b) Population growth and ageing profile.
- c) Car parking and traffic flows.
- d) Business development and employment.
- e) Age related facilities and service provision.

A key objective of the draft NDP is the provision of new and appropriate housing to meet the needs of the community. It is identified that a minimum of 240 homes will be required for Debenham, with the acknowledgment that "sites will need to come forward on greenfield sites outside the boundary". The potential for allocating strategic sites within the NDP has been considered by the Parish Council. An assessment of seven potential sites has recently been undertaken, which included the two parcels of land to the north and south of Gracechurch Street, Debenham.





View looking north along the Public Right of Way across Parcel B from Low Road.



## 03. THE SITES AND SURROUNDING ASSESSMENT

### 3.1 EXISTING SITE CONTEXT

For the purposes of describing the Sites being promoted by Taylor Wimpey, the area to the north Gracechurch Street is referred to as Parcel A and the to the south of Gracechurch Street is referred to as Parcel B.

The village of Debenham lies approximately 12 miles (19 km) to the north of Ipswich and 8 miles (13 km) to the north east of Stowmarket. The Site is located on the western side of Debenham and adjoins the existing settlement edge. The location of the Site and its immediate context are illustrated on Figure 3.1 opposite.

Debenham benefits from a wide range of services and facilities, which include a secondary school and a primary school, a leisure centre, a doctor's surgery, two churches, a number of local shops and two pubs.

The watercourses in the area define the topography of the Site and the settlement, cutting through the countryside to form a gently undulating landscape. The main approach into Debenham from the west is via the extension of Gracechurch Street, which rises in elevation as it approaches the western edge of the village. From the higher land along the road, the land falls away to the River Deben/Derry Brook to the north and Cherry Tree Brook to the south. There are wide ranging views mainly to the north and northeast from the road on the approach into the village over the undulating countryside.

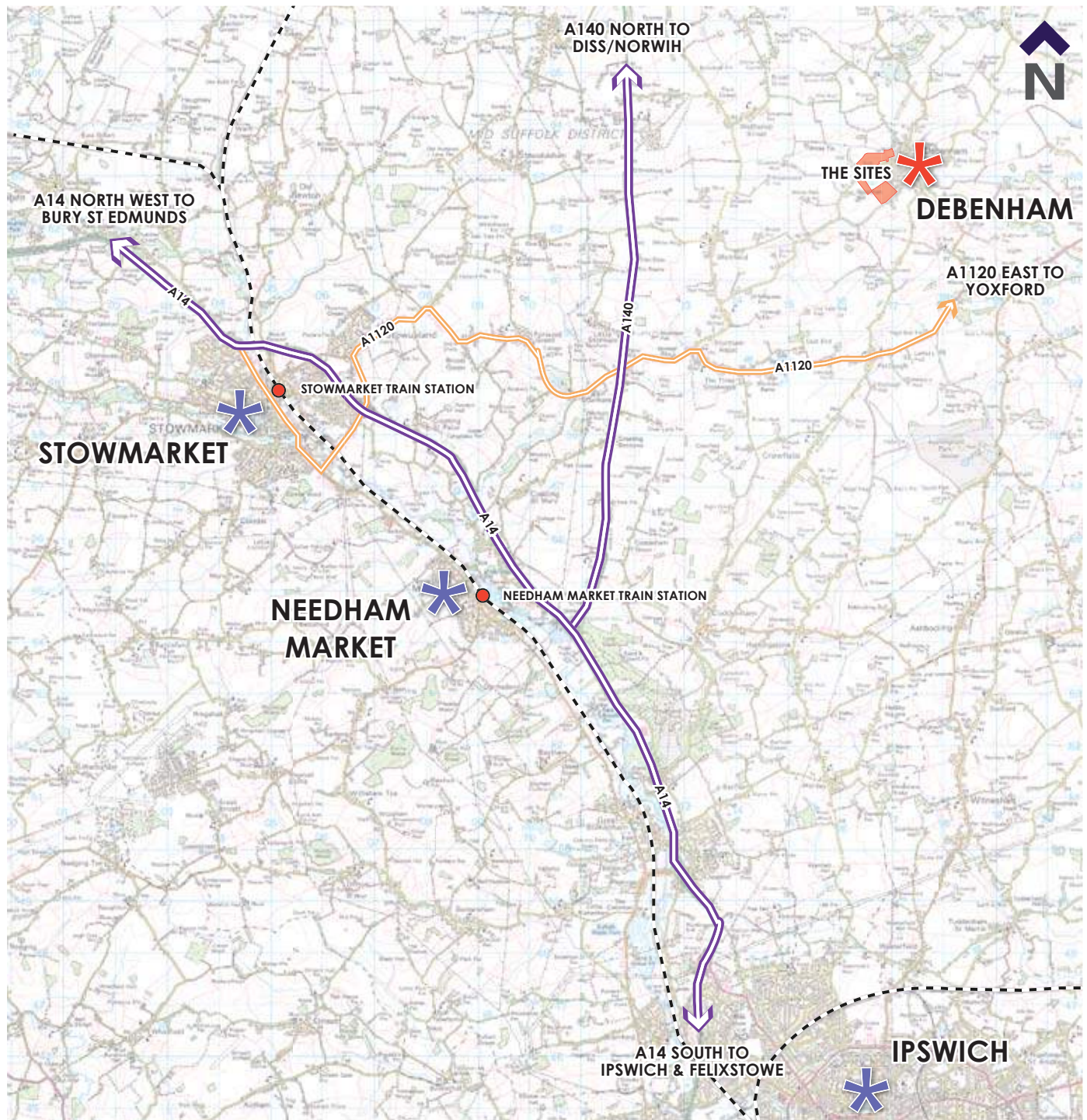


Shops and services along the High Street in Debenham.



Saint Mary Magdalene Church is located at the Centre of Debenham.

Figure 3.1: Regional Site Context Plan.





The settlement of Debenham lies to the east and southeast of the Sites. Modern development on the north western built edge of the village separates the Sites from the Debenham Conservation Area which is situated to either side of the High Street and Aspall Road in a north-south orientation to the east of the Site. To the north of Parcel A is Derrybrook Farm located adjacent to the River Deben, beyond which the land rises to arable farmland with scattered farmsteads and dwellings. Opposite the south western corner of Parcel A on the south side of Gracechurch Street is a large, newly built dwelling, to the east of which is Debenham Leisure Centre and Debenham High School.

Modern housing on the southern side of Gracechurch Street begins after the school, extending south and following the fall of the land to Cherry Tree Brook and Low Road.

The housing within the vicinity of the Sites ranges from the 1950's adjacent to Parcel A on Gracechurch Street through to the 2000's immediately to the east of Parcel B at The Meadows.



The Woolpack Public House is within the historic centre of Debenham.


















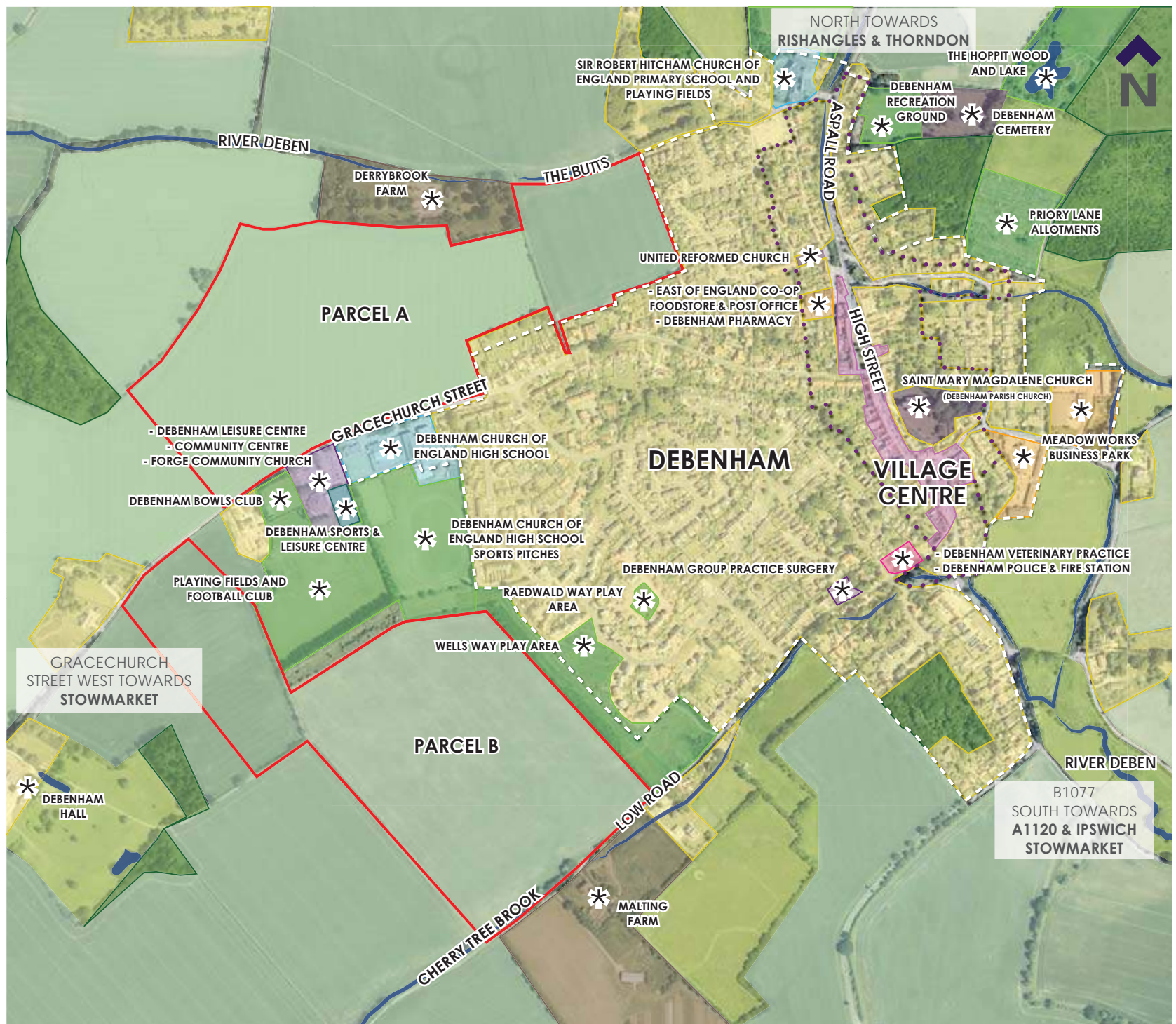
-  Site Boundary
-  Debenham Settlement Boundary  
(source: Babergh & Mid Suffolk Local Plan Consultation Map)
-  Debenham Conservation Area  
(source: Debenham Conservation Appraisal Map, Nov 2009)
-  Debenham 'District Centre'  
(source: Babergh & Mid Suffolk Local Plan Consultation Map)
-  Residential
-  Employment
-  Education
-  Health Facilities
-  Fire and Police Station & Veterinary Practice
-  Places of Worship & Cemetery
-  Working farms
-  Arable Farmland
-  Pastoral Farmland
-  Open Space
-  Woodland
-  Sports & Leisure Centre
-  Water Courses

Figure: 3.2: Surrounding Context and Land Use Plan.





## 3.2 SITE DESCRIPTION

### Parcel A

Parcel A comprises part of a large arable field and an adjacent smaller arable field. The two fields are divided in a broadly north to south location by an existing public footpath which runs between The Butts and Gracechurch Street. The public footpath is bound to the west by an unmanaged hedgerow.

The area of Parcel A to the west of the public footpath is irregularly shaped, bound to the northwest by a ditch, with occasional trees along it. To the north it is bound by the property of Derrybrook Farm, which is marked by a mainly continuous hedgerow, with hedgerow trees, and some gaps at the north eastern side.

To the east of the public footpath Parcel A consists of a roughly square field with an unvegetated embanked boundary to the north, and the lane called the The Butts running alongside the embankment. To the east and south this part of Parcel A is bound by the properties of Henniker Road and Gracechurch Street. These boundaries consist of low fences associated with the adjacent gardens, as well as trees and hedges.

The southern boundary of the area of Parcel A to the west of the public footpath is indented along its eastern section by further residential properties on Gracechurch Street, with their boundaries comprising trees and hedgerows, and some open boundaries marked by low domestic fences. The remainder of the southern boundary fronts onto Gracechurch Street, which is largely open with the exception of intermittent remnants of hedgerow along its length. The western boundary of Parcel A is undefined, with the rest of the wider field extending to the west and south west.

Parcel A falls from approximately 58m Above Ordnance Datum (AOD) at the south western edge along Gracechurch Street to its northern boundary at approximately 41m AOD, and continues to fall towards the north eastern corner to approximately 37m AOD

### Parcel B

Parcel B is located to the south Gracechurch Street and to the north of Low Road. It divided by an existing hedgerow into a smaller north western portion and a larger southern portion. The western extent of Parcel B lies beyond the current 30mph speed limit and opposite Esther's Moat, one of two cottages located immediately to the north of Gracechurch Street. To the east of the smaller part of Parcel B is a recently constructed 2 storey house set back from Gracechurch Street within a good-sized plot of land.

The northern section of the western boundary portion of Parcel B forms part of a larger field and therefore the south western boundary is undefined. Its boundary with Gracechurch Street is defined by a tall hedgerow along which there is a single gap in the hedgerow close to Esther's Moat.

The larger southern part of Parcel B is broadly rectangular in shape and lies to the south of Debenham High School, Debenham Sports and Leisure Centre and the recreation ground. The northern boundary is defined by an overgrown hedgerow, which includes a number of hedgerow trees. To the north of this hedgerow is a row of tall trees located within the adjacent recreation ground which form a strong landscape feature in the local environment. Immediately to the north is a linear area of open space and landscaping which also doglegs to the south to run alongside the eastern site boundary. The boundary between Parcel B and this linear area is marked by cleft chest fencing.

The western boundary of the southern portion of Parcel B is defined by a well-managed field hedgerow and the southern boundary fronts onto Low Road and is open. A public footpath runs in a north to south direction, adjacent to the well-managed field hedgerow forming the western boundary.

Parcel B falls from approximately 58m AOD at the north western edge along Gracechurch Street to its southern boundary at Low Road at approximately 36m AOD.

Figure 3.3: Site Features Plan.

- ① Existing Public Rights of way (PRoW)
- ② Existing treed hedgerows marking the boundaries of the Sites.
- ③ Low fences, trees and hedgerows associated with the rear gardens of adjacent properties.
- ④ Scattered tree planting along boundaries.
- ⑤ Undefined Site boundary with no landscape features
- ⑥ Grass verge to highway
- ⑦ Existing bus stops
- Public Rights of Way (PRoW)



### 3.3 SURROUNDING DESIGNATIONS

Figure 3.4 shows the designations within the context of the Sites. The Sites are not covered by any national statutory or non-statutory designations for landscape, historical or ecological character or quality.

The nearest historical designation is located approximately 400m to the east of Parcel A; the Debenham Conservation Area. The Site of Special Scientific Interest (SSSI) of Mickfield Meadow is located approximately 2km to the west of the Parcel A.

#### Conservation Area, Scheduled Monuments and Listed Buildings

The Debenham Conservation Area is situated approximately 400m to the east of the Sites, separated from it by intervening modern residential housing, with no intervisibility between it and the Sites, or between the Sites and any of the listed buildings within the Conservation Area. Further listed buildings are located alongside Gracechurch Street and these have no intervisibility with the Sites. There are listed buildings dotted throughout the wider landscape to the north of the Sites, many of which are screened by trees from the Sites.

#### Tree Preservations Orders (TPO)

There are no trees covered by TPOs on the boundaries or within the Sites. This was ascertained by consulting the Mid Suffolk District website on 30th June 2017.



-  Site Boundary
-  Sites of Special Scientific Interest (SSSI)
-  Debenham Conservation Area
-  **Grade I Listed Buildings**
  1. Church of St. Mary
-  **Grade II\* Listed Buildings**
  2. Swiss Farm Butchers - Debenham Gallery
  3. Lanchester Antiques Old House the Gables
  4. The Guildhall
  5. Ancient House
  6. 31-37, High Street
  7. Church of St Mary of Grace
-  **Grade II Listed Buildings**
  8. Spring cottage
  9. 33, Gracechurch Street
  10. The Mercant House
  11. Gull Farmhouse
  12. Barn 30 metres West of Gull Farmhouse
  13. Malting Farmhouse
  14. Poplar Hall and House
  15. Bennets Farmhouse
  16. Stable Range, 30m. west of Winston Hall
  17. Touchwood Cottage Willow Cottage
  18. Old Hall
  19. Bryces Farmhouse
  20. Ulveston Hall
  21. Shoemakers Cottage
  22. Roamwood Green Farmhouse
  23. The Old Rectory
  24. Numbers 2 and 3, Church Cottages
  25. White Hall Cottages
  26. White Hall Cottage
  27. Grange Farmhouse



Figure 3.4: Surrounding Designations.



### 3.4 COMMUNITY INFRASTRUCTURE AND AMENITIES

#### A Sustainable Place

Debenham offers a range of local services and facilities within a suitable walking distance from both Parcel A and Parcel B.

The 2011 Census data for Journey to Work demonstrates that 16% of residents live and work within the Super Output Area Mid Suffolk 007 which comprises of Debenham and the surrounding area. Of these residents 60% travel to work by car, 26% walk to work and 6% cycle. This demonstrates a sustainable mode share for local journeys.

The Sites are located in the immediate vicinity to the north and south respectively of a range of recreational facilities, which include Debenham Leisure Centre and Community Centre, Debenham Bowls Club, and Debenham Leisure Centre Football Club. These are all within convenient walking distance to the Sites.

In short, the village of Debenham is capable of supporting sustainable development and the Sites are in a sustainable location, and a logical extension to the built form of the village.

Within the village there are a range of facilities (listed alongside) that will assist in delivering a sustainable development:

- Debenham Village Centre has a number of local facilities including public houses, a cafe, a hardware store, butchers, post office and convenience store.
- The nearest bus stop is located along Gracechurch Street opposite Debenham Leisure Centre, and at the junction of Henry Street, approximately 90m from the proposed access point of Parcel A respectively.
- Debenham Church of England Secondary School (Ages 11-16 year old) is located in the immediate vicinity of the Sites, with the Sir Richard Hitcham Church of England Primary School (Ages 4- 11 year old) only 500m from the Sites.



#### Education Facilities:

1. Sir Robert Hitcham CofE Primary School
2. Debenham Church of England High School



#### Sports Facilities:

1. Debenham Leisure Centre Playing Fields and Football Club
2. Debenham Leisure and Community Centre (incorporating bowls and squash clubs)
3. Debenham CofE High School Sports Pitches
4. Debenham Recreation Ground
5. Raedwald Way Play Area
6. Wells Way Play Area



#### Emergency Services:

1. Debenham Police and Fire Stations



#### Services and Facilities within Village Centre:

The Woolpack Public House, Debenham Fish & Chip Shop, Swan House and Garden Homewares, W A Ward Greengrocers, David Shacklock Book Services Book Shop, Webster R&G Newsagents, Neaves of Debenham Butchers, Ruby and the Angel Gift shop



#### Other Services and Facilities:

1. Co-op Foodstore
2. Zeera Takeaway
3. The Filling Station Takeaway
4. Vanilla Bake House and Café
5. Hair by Stephen Anderson
6. The Little Cooperage Self-catering
7. Coopersfield Hotel
8. Meadow Works Business Park
9. Seers Medical Ltd



#### Places of Worship:

1. Saint Mary Magdalene Church
2. URC Church
3. Forge Community Church



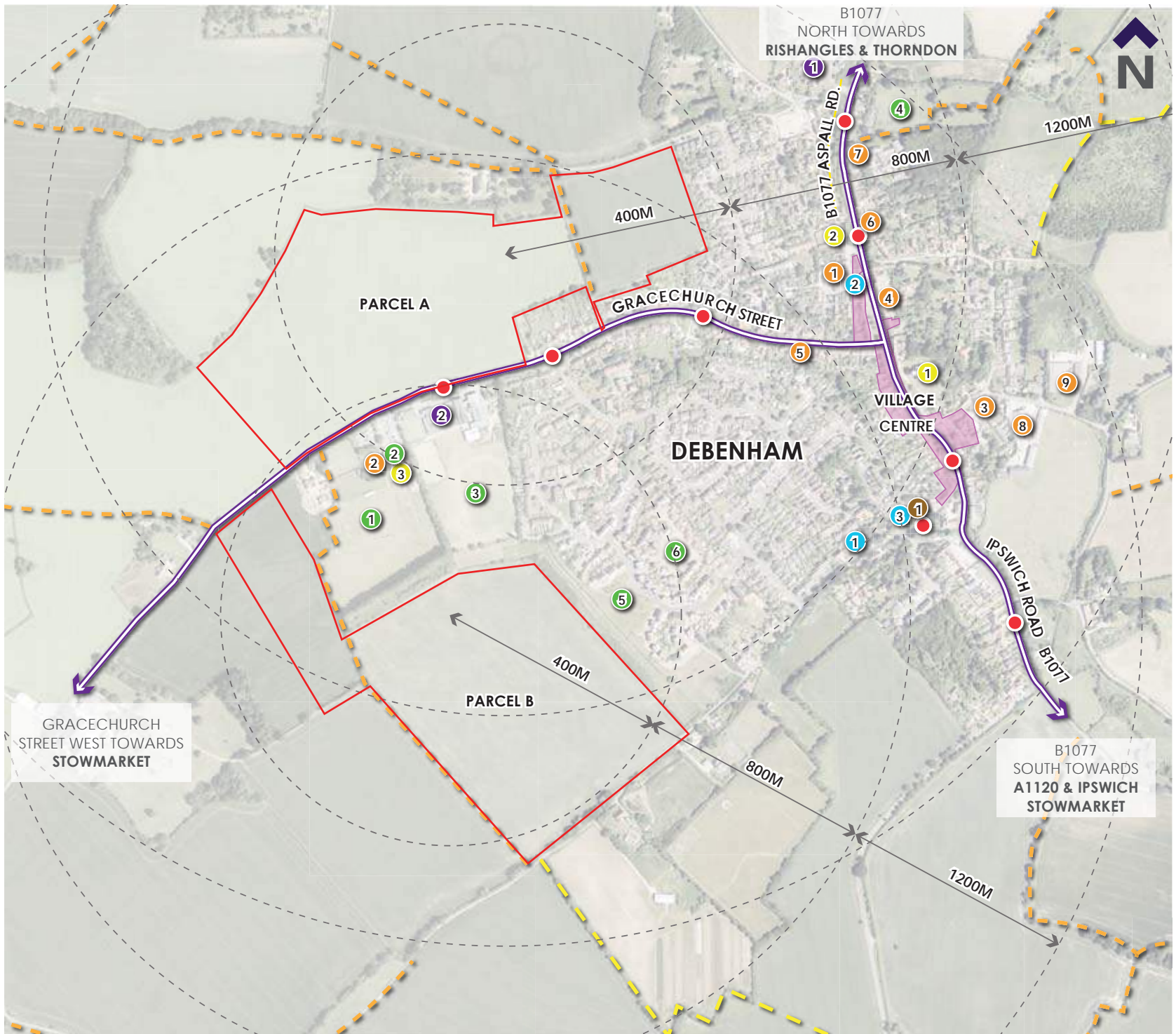
#### Health Facilities:

1. Debenham Group Practice Surgery
2. Debenham Pharmacy
3. Debenham Veterinary Practice





Figure: 3.5: Facilities Plan.



### 3.5 CONNECTIVITY AND MOVEMENT

#### Connections

The NPPF is predicated on the assumption that new developments are located in areas that are able to provide people with a choice of travel modes and are able to provide safe and suitable access for all.

When considered against this background, it is evident that the allocation of the Sites are well placed to accord with these principles.

An overview of the benefits associated with the development of the Sites is provided in the following paragraphs, with a more detailed assessment provided in the technical submission.

### 3.6 OPPORTUNITIES TO WALK AND CYCLE

The Sites are located adjacent to the existing built area of Debenham and consequently many day-to-day destinations are within walking and cycling distance. These include the primary and secondary school, local shops, public houses and health facilities.

Pedestrian, cycle and vehicle access to the Sites can be provided via Gracechurch Street for Parcels A and B. Additional pedestrian, cycle and emergency access connections can be provided onto Butts Lane from Parcel A. A secondary vehicular, pedestrian and cycle access can be provided onto Low Road from Parcel B.

### 3.7 PUBLIC TRANSPORT

#### Opportunities to Travel by Public Transport

Gracechurch Street has a number of bus services, including route 114 which runs Diss - Eye - Thorndon - Debenham - Stoneham Aspell - Claydon - Ipswich every 2 hours from the bus stop opposite the High School.

In addition, the High Street benefits from route 116, providing a morning and evening service to/from Ipswich Train Station Monday to Saturday from the bus stop opposite the High School. Route 116 serves the High Street more frequently with services every 2 hours throughout the day.

It is expected that any development expansion in the west of Debenham will enhance local bus services including potential use of the new street network through Parcel B.






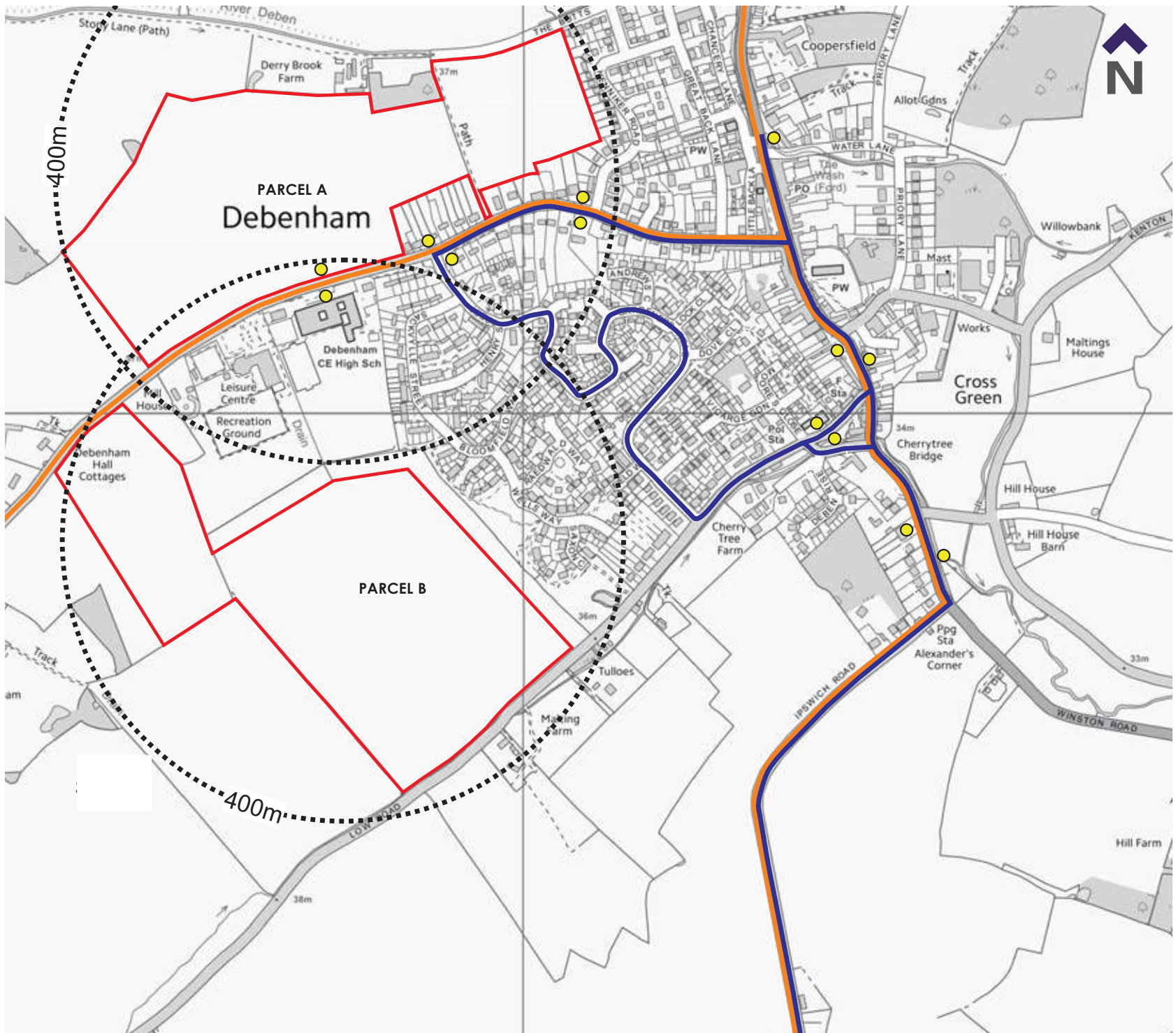
|   |               |
|---|---------------|
|  | Site Boundary |
|  | Bus Route 114 |
|  | Bus Route 116 |
|  | Bus Stop      |
|  | 400m Cordon   |

Figure 3.6: Accessibility Plan - Bus Routes.





## 04. FLOOD RISK AND DRAINAGE CONSIDERATIONS

### Context and Site Constraints

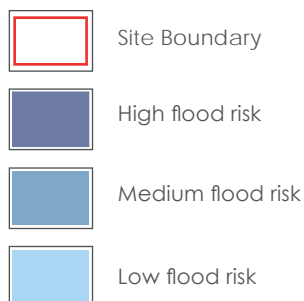
Debenham has a history of flooding in the village which is primarily attributable to the convergence of three tributaries of the River Deben. One of the tributaries is the Derry Brook which runs parallel to The Butts that forms the northern boundary of Parcel A; another of the tributaries is the Cherry Tree Brook which forms the southern boundary of Parcel B.

Whilst the Derry Brook and Cherry Tree Brook are prone to flooding, the majority of Parcels A and B are located outside of the area susceptible to flooding. The exception is a narrow band of flooding under the extreme storm event (the 1 in 1,000 year flood or Flood Zone 2) that affects the northern boundary of Parcel A, and a narrow band of Flood Zone 2 and 3 (the medium and high probability flood areas) in the southern extremity of Parcel B. No other forms of flooding would influence the development potential of the sites.

### Design Response / Design Principles

No new dwellings are proposed in the areas of the Sites that are deemed susceptible to flooding under varying storm events.

To respect the flood prone nature of the local watercourses and the downstream catchment, surface water runoff from the proposed development will be restricted to greenfield rates, i.e. existing rural rates; in this instance the rural rate generated by the 1 in 1 year storm will form the basis of the surface water management strategy so as to provide betterment for more significant storm events. Surface water attenuation basins with restricted outfalls augmented by additional upstream sustainable drainage techniques would help to control both the quantity and quality of water in the receiving watercourses.



### Deliverability and Opportunity

Avoiding development in the flood prone areas of the Sites and managing surface water runoff are both achievable and hence the Sites are deliverable in terms of development and flood risk policy.

In terms of the wider flood risk issue for Debenham, there are many constraints to engineering a flood protection scheme within the village and hence the solution is to 'slow-the-flow' prior to the water reaching the settlement. Currently four Natural Flood Management (NFM) schemes have been proposed around Debenham in two of the three drainage catchments (The Gulls and the Cherry Tree Brook catchments). The third catchment, the Derry Brook catchment, currently lacks a flood alleviation proposal.

The proposed development of the Sites provide an opportunity to deliver (physically or via financial contribution) a NFM measure in the Derry Brook catchment to complete the delivery of upstream flood management measures, whilst also providing an opportunity to provide an additional NFM measure in the Cherry Tree Brook Catchment to supplement existing NFM measures in the same catchment.

Figure 4.1: Fluvial Flood Risk Map.

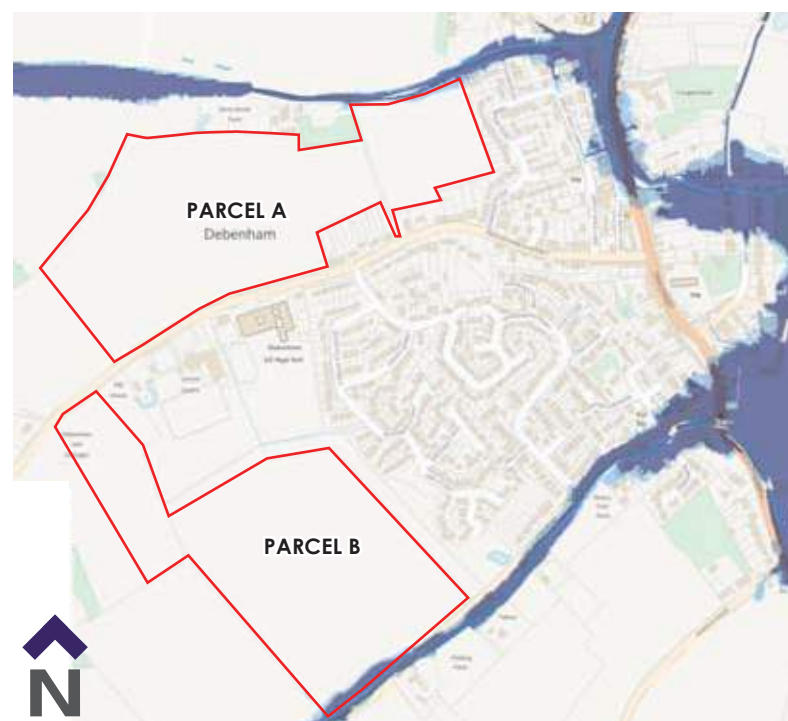
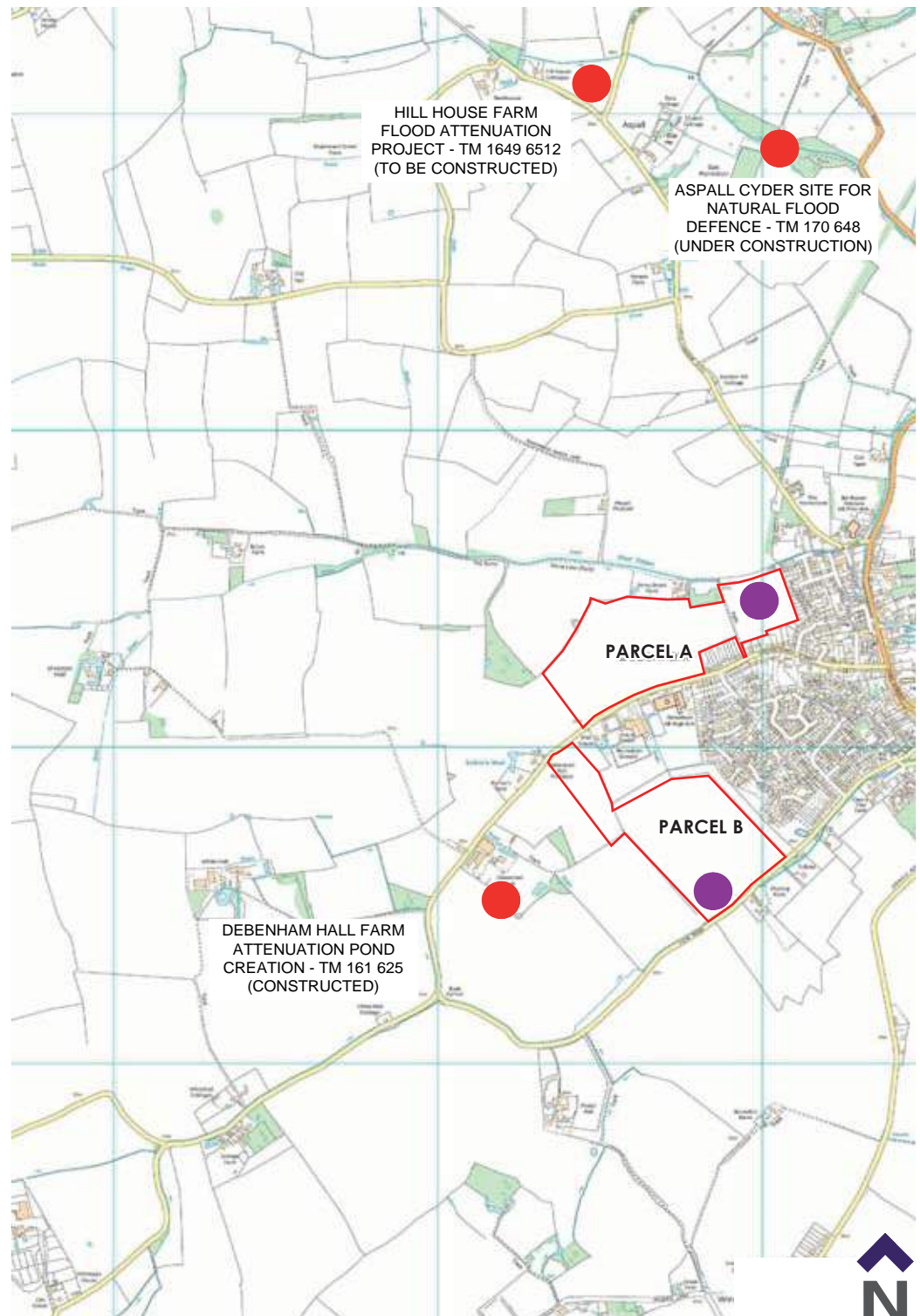


Figure 4.2: Proposed Flood Management Scheme for Debenham.





## 05. LANDSCAPE CONSIDERATIONS

### 5.1 LANDSCAPE CHARACTER

The Sites are not covered by any statutory or non-statutory designations for landscape character or quality. There are no tree preservation orders covering any trees within or on the boundaries of the Sites. The Debenham Conservation Area lies to the east of the Sites, separated from it by modern development. There are several Grade II and Grade II\* listed buildings, as well as the Grade I listed Church of St Mary contained within the Conservation Area. Other Grade II listed buildings are located within the settlement and separated from the Site, while the Grade II listed Malting Farmhouse, is located opposite Parcel B on Low Road.

The landscape features are contained to some of the boundaries, and include an internal hedgerow within Parcel A, the northern and eastern boundary hedgerows of the northern part of Parcel B and trees along part of Parcel B's south eastern boundary on Low Road. Given their location these existing features should be retained where possible.

As a whole, the Sites are considered to be generally pleasant, with relatively ordinary characteristics, and are judged to have a reasonable ability to accommodate development. The public footpath which runs between Gracechurch Street and The Butts through Parcel A, and the public footpath which follows the internal south western boundary of the southern part of Parcel B mean that the Sites are likely to have some value at a local level.

The eastern part of Parcel A and the larger southern part of Parcel B are well related to the modern development on the western edge of the settlement. Development of the type being considered would be compatible with the existing settlement pattern, and would be seen in the context of it in views from the wider landscape. There are views over the undulating countryside to the north and northeast on the approach into Debenham from the west. On the approach from the west topography contains views of the village until adjacent to the Leisure Centre, and for these reasons the western edge of Parcel A and the northernmost part of Parcel B are considered more sensitive from a visual and landscape perspective.

### 5.2 VISIBILITY

The undulating topography of the western extension of Gracechurch Street and the intervening vegetation and built form means that views of the Site are prevented until beyond Ester's Moat. From here the western side of Parcel A is visible, while Area B is predominantly contained to the southeast by the northern boundary hedgerow and the fall of the land.

Views of the eastern part of Parcel A from Gracechurch Street are contained by the existing housing along the northern part of Gracechurch Street and by Parcel A's internal hedgerow. The eastern part of Parcel A is visible for a short distance from The Butts to the south, and from the public footpath which runs along this hedgerow within the Site. Through gaps in the hedgerow, there are partial views of Parcel A from this footpath.

From the public footpath network, there are views of the western side of Parcel A for a short distance to the west from the public footpath which extends west from Gracechurch Street to the north of Mickfield. Available views of Parcel A from the public footpath network to the north comprise partial views of the upper elevations of the parcel from the public footpath which extends northwest from The Butts, and partial views from the public bridleway along Roamwood Green Lane and a short section of the public bridleway south of Old Hall.

Partial, glimpsed views of the southern, elevated parts of the parcel are possible from the roads to the north of Parcel A where gaps in vegetation allow. These include views from a short stretch of Little London Hill, and from short stretches along the eastern section of the unnamed road between this and Old Hall. There is a partial glimpsed view of the highest elevation of Parcel A for a short section of Bellwell Lane to the northeast.

Views from residential properties around Parcel A are possible from the rear of the houses on Henniker Road and along Gracechurch Street where boundary fences and vegetation allows. Views are possible from some houses opposite the parcel which front onto Gracechurch Street, and from the High School and the Leisure Centre. Views are possible from some of the isolated properties in the landscape immediately to the north of the parcel, but these are restricted to partial views from upper floors.

The ridge along Gracechurch Street, the undulating topography of the wider landscape and the fall within Parcel B mean that the majority of the available views of Parcel B are to the south in the near vicinity of the Site.

There are views of the southern part of Parcel B from Low Road, close to and adjacent to it, while vegetation screens the parcel to the west and existing development screens it to the east. Partial views, through intervening hedgerows are possible of the northern elevations of Parcel B along the Ipswich Road for a short distance to the southeast, seen adjacent to the existing modern housing on the southwest of the village.

Views are possible from parts of the public right of way network, within and to the south of Parcel B. Views are possible of the southern part of the parcel from the footpath which runs adjacent to the south western boundary, while the northern part is screened by the hedgerow between the two areas. Partial views are possible from the higher elevations of two public bridleways which extend to the south off Low Road, whilst beyond Debenham / Ipswich Road to the southeast, the land begins to fall and views are no longer available.

There are views of the northern part of Parcel B from the housing in the vicinity of the Sites, including from the new houses which face the southern part of the parcel off Wells Way, Bloomfield Way and Saxon Close to the east from Malting Farmhouse and Tulloes to the south. There are views of the northern part of Parcel B, but no views of the southern part from Mill House, off Gracechurch Street. Where vegetation allows, there are partial views of the southern part of the parcel from some of the isolated farmhouses to the south, but limited to no more than 1.5km to 2km from the Site.

In conclusion, views are restricted by the topography of the area to the near vicinity of the Site, with the majority of the views consisting of either Parcel A or B. Where views of the parcels are possible in the wider landscape, they are seen in the context of the modern development on the western edge of Debenham.

**Figure 5.1:** Photograph Location Plan (see overleaf for photographs).



### 5.3 ABILITY TO ACCOMMODATE DEVELOPMENT

Overall the Sites are considered to be well related to the existing settlement and is therefore capable of being considered for future residential development. Although the development would extend the settlement to the west, the built development within Parcel A would extend no further than the Leisure Centre on the western edge of the village. A strong wooded edge to the development is proposed, with landscaped viewing corridors included within the layout to respect and retain focussed views of the countryside to the north and northeast.

Parcel B extends further west than Parcel A, from Gracechurch Street behind a wooded edge, with the majority of the housing contained to the south. Tree planting within the parcels is proposed to break up the roof lines and assist in integrating the development into the rest of the well treed village.

The key landscape and visual principles to be included within any development proposals are to:

- Respect the western edge of the village and its approach from Gracechurch Street by including a substantial area of public open space, with woodland planting and a green gateway on the western side of Parcel A;
- Retain focussed views to the wider countryside to the north using landscaped corridors through development within Parcel A;
- Set the new housing back from the northern part of Parcel B to respect the approach into the village, and to create a green gateway that links the two parcels together;
- Soften the north western edge of Parcel B by using an area of public open space, planted with a wooded edge to filter the development in the northern part of Parcel B;
- Tree planting within the parcels to link the development to the wider wooded townscape and landscape, and to break up the development into character areas;
- Retain the alignment of the two public footpaths where they cross the Sites, setting them within landscaped corridors;
- Pedestrian routes to link the public footpaths to the public open space and play areas within the development and to the existing footway network of the settlement;
- Areas for formal and informal children's play for a range of ages; and
- Landscaped SuDS (sustainable drainage) features to be located within the public open space to provide attractive areas within the development.





**Photograph 1** – View from the western side of Gracechurch Street looking north across Parcel A



**Photograph 2** – View from the extension of Gracechurch Street to the southwest of the village looking northeast



**Photograph 3** – View from the public bridleway to the southeast of Parcel B looking north

## 06. ECOLOGY

A Phase 1 Habitat Survey was undertaken in March 2017 which recommended that some protected species may be present on the Sites, and therefore further surveys would be required.

A reptile survey was undertaken on the Sites which recorded a low population of slow worm and grass snake. The great crested newt survey recorded a low population of great crested newts in the adjacent ponds, and it was considered that they could use the field margins and tall ruderal vegetation for foraging and commuting in their terrestrial phase. If the field margins and tall ruderal vegetation can be retained as part of the proposed development, it was considered that no pure mitigation work on reptiles or great crested newts would be required. However, if this was not possible, appropriate mitigation on reptiles and great crested newt would need to be carried out in the active season before work commences. In addition, a European Protected Species Mitigation Licence for great crested newt would be required prior to enable the translocation of terrestrial newts from the field margins. In addition, appropriate mitigation would need to be completed on both these species before construction work can commence.

The breeding bird survey indicated that skylarks were likely to be using the arable fields for nesting and therefore appropriate mitigation will be required.. Appropriate mitigation in the form of skylark plots will be required, preferably in adjacent habitats and a Mitigation Strategy will need to be agreed with the LPA.

The bat survey is still ongoing, and more details will be provided in April/May 2018. However, if bats are using the hedgerow for commuting, appropriate compensation will be required and this would involve planting up existing gaps in hedgerows with native species, or alternatively using existing gaps in the hedgerow for site access.

The water vole and otter survey indicated that this species was present in an adjacent pond and stream. However, no impacts on these species have been predicted and therefore no mitigation is recommended. In addition, badgers were not considered to be using the sites and no setts were identified within 30m of the site boundary. However, it is recommended that an updated badger survey should be undertaken within 6 months of the works commencing.





View looking south across Parcel A from the public footpath that runs across this part of the Site. The development of the Sites offers the opportunity to strengthen existing landscape features and create new wildlife habitats.

# 07. OVERVIEW OF OPPORTUNITIES AND CONSTRAINTS

The Opportunities and Constraints associated with the proposed residential led development have been identified following the assessment of the Sites and their surroundings, as detailed in previous sections of this Vision Document. These are listed below and are shown on the Opportunities and Constraints Plan at Figure 7.1. This assessment of the Sites and their surroundings have informed the design proposals and

## 7.1 OPPORTUNITIES

- Provision of high quality, sustainable, and sensitively designed new housing, with the Sites able to accommodate up to 640 new homes with associated green infrastructure.
- Create a carefully planned new residential led development that is well-related to the existing settlement of Debenham.
- Provision for new vehicular, cycle, and pedestrian access points from Gracechurch Street, The Butts, and Low Road.
- Creation of a locally distinctive development which draws upon the local vernacular.
- To provide new children's play areas which will form attractive focal points for new and existing residents.
- To provide new sustainable drainage system (SuDS) and a flood alleviation feature which can form an integral part of the development's green infrastructure, providing ecological benefit, habitat creation and wider flood mitigation for Debenham.
- To create a new landscaped green gateways into Debenham.
- Provide new large areas of public open space with woodland, tree, thicket, and meadow planting along both the western boundaries of Parcels A and Parcel B to help filter views of the proposed development, but to also form an intergral part of the Site's green infrastructure network.
- The Public Right of Way which runs adjacent Parcel B's western boundary, will provide a direct link to the High School and Leisure Centre.
- To provide new recreational routes that link to Gracechurch Street, The Butts, and Low Road, integrating the development into its surroundings and into the surrounding Public Rights of Way network.

## 7.2 CONSTRAINTS

- Existing trees and hedgerows to be retained as an integral part of the development proposals where possible, with compensatory planting provided where necessary for the removal of vegetation.
- The Sites should be outward looking onto the new public open spaces and dwellings should be set back from the Site's boundaries. The new dwellings adjacent to the existing properties along Henniker Road and Gracechurch will have deeper rear gardens and additional landscaping to respect their setting.
- The Public Rights of Way which cross Parcel A and runs adjacent Parcel B's western boundary, should be retained and form an integral part of the Site's circulation network, allowing for safe and easy access across the Sites and to wider areas of Debenham.
- New boundary vegetation to include new woodland, thicket and hedgerow planting which will create a landscaped edge to the development. In particular along the undefined western boundaries of both Parcel A and Parcel B, setting the entire Sites in a landscaped framework,
- The Sites fall to low points in the north and north eastern corner of Parcel A, and to the south east of Parcel B. Where these low points occur will define the location of the potential attenuation basins and flood alleviation features.





Opportunity for SuDS features to provide ecological and social benefits.



Opportunity for new tree and wildflower meadow planting.



The main street will be lined by new street tree planting.



Opportunities for formal and Informal children's play areas.



Site Boundary: **35.39ha**

Parcel A: **18.13ha**

Parcel B: **17.26ha**



Main Vehicular Routes & Bus Stops



National Cycle Route (Sustrans 40) 'The Heart of Suffolk Cycle Route'



Existing Bridleway



Existing Public Rights of Way (PROW)



Debenham Conservation Area



listed Building: Grade I



listed Building: Grade II\*



listed Building: Grade II



Recreational areas



Points of Interest/Local Facilities

### Constraints



Existing Contours



Existing Vegetation



Sensitive Edge



Existing Watercourse & Water Bodies (Appropriate buffers to new development required)



Extent of Fluvial Flooding  
(Source: Gov.uk)



Extent of Surface Water Flooding  
(Source: Gov.uk)



Current 30mph Speed Restriction

### Opportunities



Potential Vehicular & Pedestrian Access Points (subject to final Access Strategy)



Potential Emergency Access Points (subject to final Access Strategy)



Potential Developable Area



Potential Vehicular Circulation



Potential to Re-Route PROW



Potential Building Frontages



Potential Pedestrian links



Potential Green Corridors & Public Open Space



Potential Woodland Belt



Opportunity to create a direct green link between the development at Wells Way and the new development



Potential Landscaped Gateway Feature into Debenham



Potential Sport / Recreation Facility



Opportunity for view corridors to be enhanced



Potential locally Equipped Area for Play (LEAP)



Potential local Area for Play (LAP)



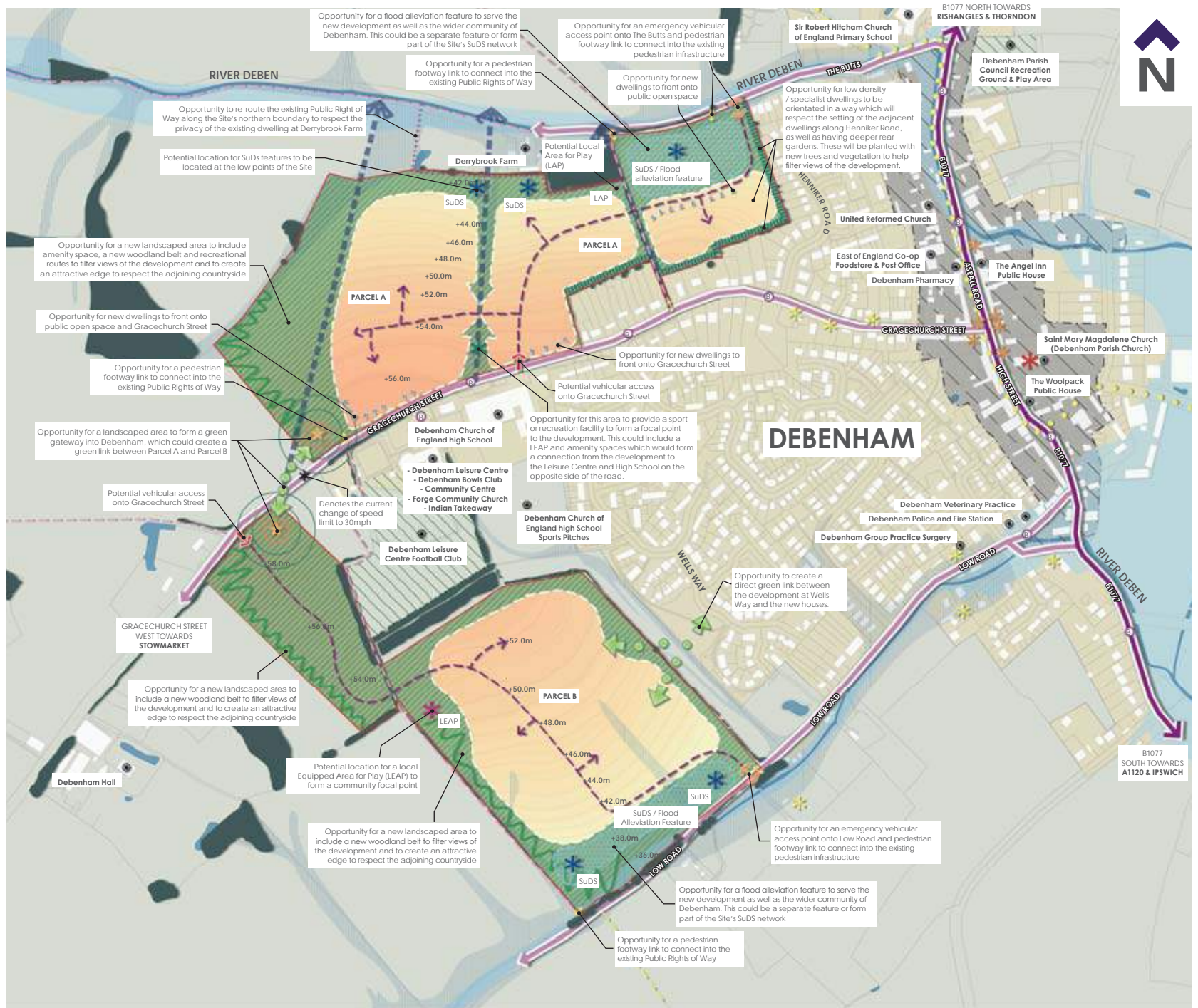
Potential Location for SuDS Features



Potential Flood Alleviation Feature



Figure 7.1: Opportunities and Constraints Plan.





## 08. DEVELOPMENT VISION

*The Development Vision for the Sites at Debenham balances the need to maximise development potential of a scarce resource, greenfield land, whilst respecting its edge of settlement function. Our Development Vision ensures that the Site's full residential and open space potential is realised in a form that accords with the principles of good urban design.*

### 8.1 INITIAL CONCEPT MASTERPLAN

The Initial Concept Masterplan provides a vision for how the design principles could be realised to create a sustainable, high quality and distinctive new neighbourhood that fits with the existing community. The Initial Concept Masterplan shows how a considered number of new streets will connect to Gracechurch Street, The Butts and Low Road to create a development that will form an integrated and highly accessible part of the wider Debenham village.

It is envisaged that the new homes will overlook Gracechurch Street in both Parcels A and Parcel B to provide overlooking and attractive aspects along the road as it passes through the Sites. New homes will back onto existing properties with deeper rear gardens with additional tree and hedgerow planting to respect the setting of the existing properties.

The new areas of green infrastructure will deliver a range of landscape, ecological and recreational benefits and provide an important new community resource comprising approximately 52% of the Sites for use by both existing and future residents of the Debenham. New areas of woodland planting along both Parcel A's and Parcel B's western boundary will reflect the scattered woodland character of the area, as well as setting the entire Sites in a landscape framework and filtering views of the development from the countryside to the west. This new woodland planting will also incorporate meadow planting, formal and informal footways, and areas for informal play.






























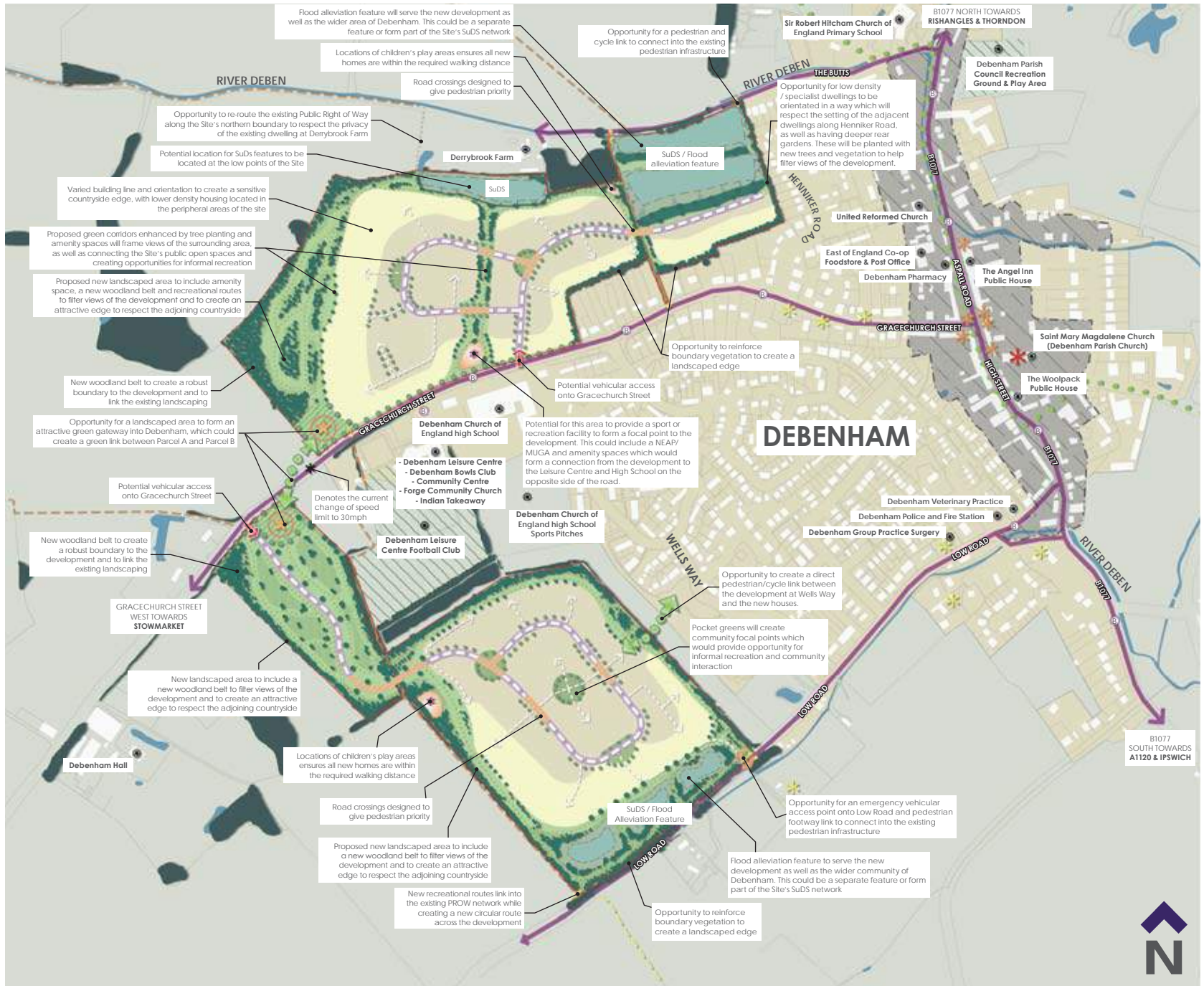
|   |  |
|---|--|
|    | Site Boundary: <b>35.39ha</b><br>Parcel A: <b>18.13ha</b><br>Parcel B: <b>17.26ha</b>                                    |
|    | Existing Vehicular Routes & Bus Stops  |
|    | National Cycle Route (Sustrans 40)<br><small>'The Heart of Suffolk Cycle Route'</small>                                  |
|    | Existing Bridleway   |
|    | Existing Public Rights of Way (PRoW)   |
|    | Debenham Conservation Area   |
|    | Listed Building: Grade I   |
|    | Listed Building: Grade II*   |
|    | Listed Building: Grade II  |
|    | Recreational Areas   |
|    | Points of Interest/Local Facilities  |
|    | Current 30mph Speed Restriction  |
| <b>Concept Masterplan</b>   |  |
|    | <b>Parcel A</b> -<br>Potential residential land: <b>9.80ha</b><br>Approx. 340 dwellings @ 35dph                          |
|    | <b>Parcel B</b> -<br>Potential residential land: <b>8.51ha</b><br>Approx. 300 dwellings @ 35dph                          |
|  | Lower density housing areas  |
|  | Higher density housing areas   |
|  | Potential vehicular & pedestrian access points (subject to final access strategy)  |
|  | Potential Emergency access points (subject to final access strategy)   |
|  | Potential spine road through the development   |
|  | Potential secondary streets/private drives & lanes   |
|  | Potential recreational routes  |
|  | Shared surface road crossing points for pedestrian priority  |
|  | Potential play facilities for children and young people  |
|  | Potential pedestrian linkages  |
|  | Existing vegetation  |
|  | Potential formal and informal recreational areas and small amenity spaces (to include new landscaping and tree planting) |
|  | Potential Landscaped Gateway Features  |
|  | Existing Watercourse & Water Bodies<br><small>(Appropriate buffers to new development required)</small>                  |
|  | Potential Flood Alleviation Feature & Sustainable Drainage Systems (SuDS)  |

Figure 8.1: Initial Concept Masterplan.



## 8.2 LAND USES AND DENSITY

It is considered that successful communities should be supported by a range of green infrastructure uses in order to support vitality within the public realm and to promote high levels of health and well-being. The new homes will be supported by a mix of green infrastructure uses which will deliver benefits for both new and existing residents. An appropriate balance will be achieved between housing development, open space, informal amenity green space and formal sports facilities.

It is anticipated that the Sites will be developed at a density of 35 dwellings per hectare (dph), which will ensure an efficient use of the Sites whilst respecting its edge of settlement location, where a balanced approach can be applied to the provision of public open space and new landscaping. Within this overall density framework, a range of densities will be established throughout the development. When combined with landscaping and building form, this will assist in providing different areas of recognisable character.

The development of the Gracechurch Street Sites will also deliver a range housing types, sizes and tenures, including new affordable homes, also considered the opportunity may exist to provide specialist housing, which could include accommodation for the elderly or people with dementia.

## 8.3 GREEN INFRASTRUCTURE

The Initial Concept Masterplan delivers an extensive green infrastructure framework that conserves the existing landscape features and aims to establish a variety of new landscape features and wildlife habitats.

*Overall, approximately 52% of the Sites will remain as green infrastructure and comprise areas of retained trees and hedgerows, new landscaping, public open space, the creation of a new green gateway into Debenham, children's play areas, and SuDS features.*

The Initial Concept Masterplan shows how the green infrastructure network is fully integrated with the new homes to provide a range of multi-functional green spaces that are easy to access. The Initial Concept Masterplan also shows how new pedestrian and cycle connections onto Gracechurch Street, The Butts and Low Road will facilitate easy access to the development's green infrastructure from the nearby existing areas of Debenham.

A key function of the green infrastructure is to allow for substantial new landscaping to the western site boundary of both Parcel A and Parcel B. This new landscaping will create a landscaped boundary of woodland, tree, thicket, and meadow planting, which will create a new green edge to Debenham as well as setting the entire Sites in a strong vegetated framework, forming an integral part of the Site's green infrastructure.











New play and sports facilities are proposed within the development to provide benefits to new and existing residents alike.

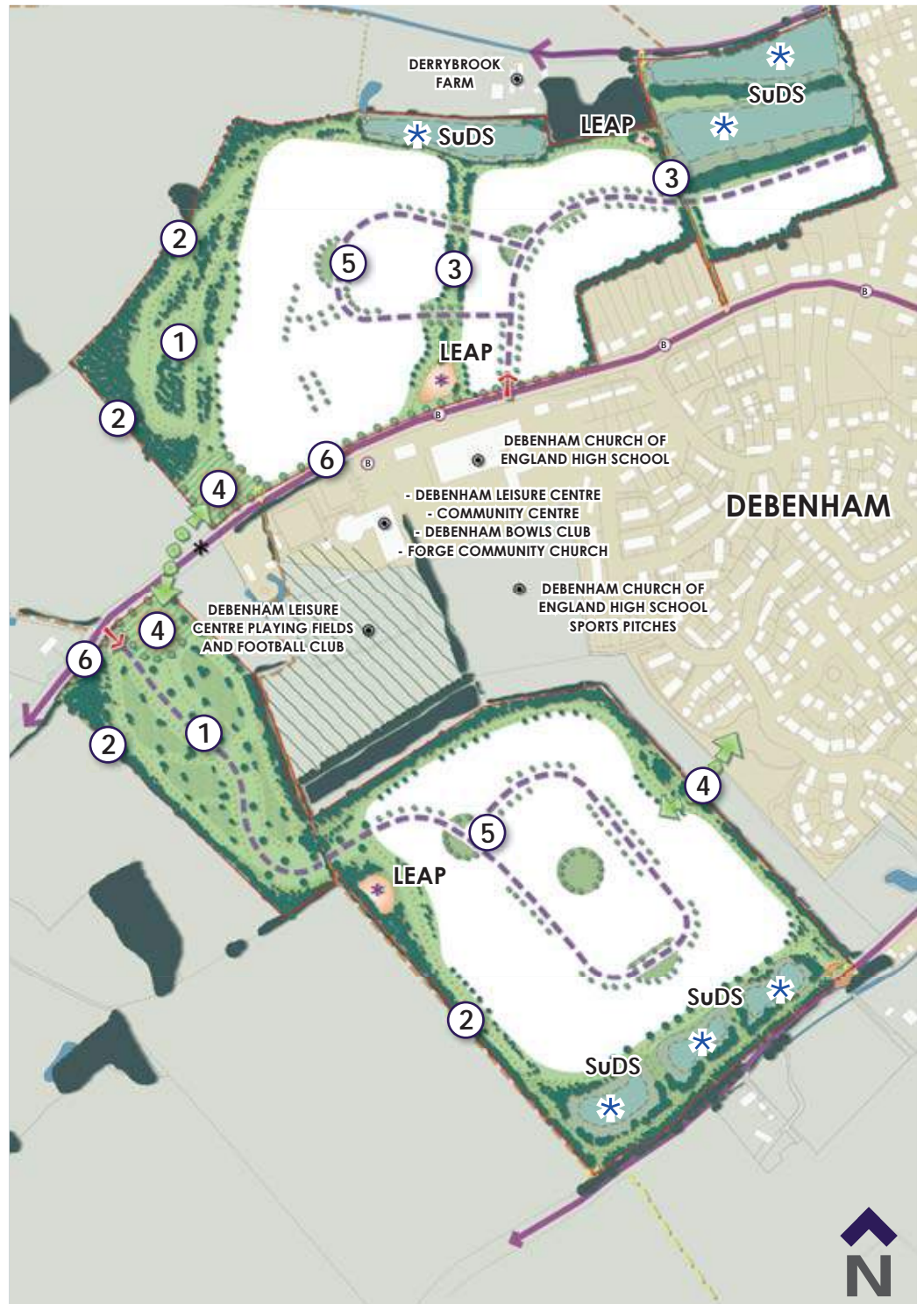
### THE BENEFITS OF THE PROPOSED MIX OF GREEN INFRASTRUCTURE USES:

- **More convenient access to green infrastructure facilities.**
- **Greater opportunities for social interaction.**
- **A greater feeling of safety with 'eyes on streets'.**
- **Greater vitality and street life.**
- **Opportunity to adopt healthier lifestyles.**



Figure 8.2: Green Infrastructure Plan.

-  Site Boundary
  -  Potential Vehicular & Pedestrian Access (Subject to Access Strategy)
  -  Potential Emergency Access Points (Subject to Access Strategy)
  -  Main Roads and Bus Stops
  -  Existing Bridleway
  -  Existing Public Rights of Way (PRoW)
  -  Potential Spine Street through Residential Development
  -  Potential Pedestrian Linkages
  -  Potential Children's Play Areas
  -  Potential Sustainable Drainage System Features including Potential Flood Alleviation System
- 
- ①** New areas of public open space to include tree planting, wildflower meadows, formal and informal recreational routes and opportunities for play.
  - ②** New boundary vegetation along the western boundary will create a strong landscaped edge.
  - ③** Green corridors will incorporate new recreational routes, creating pleasant and direct routes to new and existing community facilities.
  - ④** Landscaped areas will form an attractive green gateway into Debenham as well as creating a green link between both parcels
  - ⑤** Central greens overlooked by new buildings, will create focal points to the development.
  - ⑥** Attractively landscaped frontage will create a greened approach to the new development.



## 8.4 MOVEMENT AND CONNECTIVITY

The Vision for the Sites is to create a clear and legible street structure that maximises permeability within the development and makes clear connections to the existing routes and facilities within the local area. It is envisaged that two carefully considered access points will be taken from Gracechurch Street; one to serve Parcel A to the north and one to serve Parcel B to the south.

Secondary access points for emergency vehicles, cyclists and pedestrians is proposed from The Butts for Parcel A and Low Road for Parcel B. These access points will be extended into the Sites to form the principal network of streets, which will be designed to be clearly understood as the main thoroughfares through the new housing areas. Away from these principal thoroughfares, the proposed layout of the development area is based upon an irregular grid of perimeter blocks that creates a permeable development form offering a choice of routes. This permeable street layout will encourage walking and cycling for local trips, with a number of new connections provided to the wider pedestrian and cycle network. As part of the development proposals, improvements to existing bus stops have been considered.

The network of proposed new recreational routes for walking and cycling will form an important new community resource. They will run through the attractively landscaped setting afforded by the development's new green infrastructure. These recreational routes will provide health and well-being benefits for both new and existing residents and promote connectivity across the new neighbourhood.

The draft Debenham Neighbourhood Plan (NP) identified the following "pinch point" areas in Debenham where traffic flows and vehicle parking are considered to be an issue:

- The High Street/Gracechurch Street junction
- Outside the High School
- In the vicinity of the Primary School
- In the vicinity of the doctor's surgery
- In the vicinity of Great Back Lane

As part of future development proposals, these pinch points will be considered in detail in with Suffolk County Council as Highway Authority in order to understand the existing issues and establish if the proposals can offer any betterment.

## 8.5 CHARACTER

The external appearance of the new homes will respect the vernacular of Debenham and the local area. The new homes will not directly replicate the settlement's vernacular, but draw upon local building styles, details and materials to create visual cohesion. The following general principles will guide the design of the new dwellings:

- **Simple Built Form:** Buildings will be designed with a simple form and an appropriate level of detailing that complements Debenham's vernacular.
- **Unity:** New homes will convey an impression of unity relieved by minor points of detail, materials and grouping, producing variety with harmonious identity.
- **Key Buildings:** Key buildings using special details, raised building heights and/or increased massing will be used in key locations.
- **Building Groups:** Groups of buildings will be the principal visual elements that characterise the development. With the exception of key buildings, individual dwellings will be subservient to the building group.
- **Corners:** Houses on corners should have dual-frontages and use features such as bay windows to emphasise their pivotal position.
- **Materials:** A restrained palette of materials should be used and these building materials should be sympathetic to the local vernacular. The choice of materials should be consistent with local colours.





## 09. DELIVERY

### 9.1 DELIVERY

The land to the north and south of Gracechurch Street, Debenham has the potential to deliver up to 640 new homes together with associated green infrastructure, walking, cycling and vehicular access, sustainable drainage and flood attenuation features, public open space and landscaping. It is anticipated that on-site development would be delivered over two phases in order to facilitate the development of the individual land parcels, within the remit of a comprehensive site wide masterplan. The parcel to the north of Gracechurch Street would most likely be brought forward as the first phase, delivered over the short to medium term (0-10 years of the plan period). The delivery of land to the south of Gracechurch Street would then follow over the medium to longer term (10-15 years of the plan period).

### 9.2 NEXT STEPS

This Vision Document will inform future planning applications, and will be a material consideration in their determination and represents the direction of travel for the Site proposals.

It will remain a 'live' document, and should be regularly updated and be informed by planning application submissions and changes in site circumstances as and when appropriate.

The Sites provide an opportunity to deliver a development in a sustainable location which can provide development to help meet the housing requirements of Babergh and Mid Suffolk District Council.

The sites provide an opportunity to integrate development with the existing community; and the framework for the sites have been created responding to the opportunities at the sites.

The sites are capable of being developed and delivered and provides appropriate supporting infrastructure. The development is capable of being phased to allow early development of part of the sites and the proposals have been designed to not harm interests of acknowledged importance.

A clear vision for the development has been created, which has been developed into a framework in which proposed housing development can come forward.

## 010. CONCLUSIONS

In conclusion, there are no overriding constraints which would prevent the development of the Sites.

This is a high level early stage visioning document. Early assessments have informed our thinking and the next stages would allow for more detailed assessment, analysis and design.

The document has illustrated an indicative framework through the Initial Concept Masterplan which could form the basis of future development proposals. This has been built up in response to an appreciation of the context of the local area, demonstrating a credible and compelling opportunity to enhance the Sites.

This work can be the starting point of refinement and detailing, based on further assessment of potential constraints and technical feasibility.

We invite Babergh and Mid Suffolk Council and other key stakeholders to consider the clear merits of this development opportunity.

## VISION STATEMENT

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The Sites at Gracechurch Street has been designed to potentially create a **vibrant, integrated and highly sustainable** extension to the village of **Debenham**. Our proposals for the Sites have carefully considered the **economic, social and environmental** dimensions set out in the NPPF. Our analysis of the Sites show that that it is not subject to any physical or infrastructure constraints and **therefore it can make a significant contribution to housing delivery.**

Our vision for the Sites at Gracechurch Street is to **successfully deliver** a new development which is defined by a **range of green infrastructure uses** that will provide a range of **ecological, landscape and recreational benefits**. Critically, **new linkages with the existing settlement** will ensure that **existing residents will benefit from the new green infrastructure** as much as the development's new residents will.

Our vision for the Sites also **looks beyond its boundaries** by demonstrating how a **flood alleviation feature** can be incorporated into the proposals to complete the wider delivery of flood management measures in the village.



Dixies Barns, High Street, Ashwell, Hertfordshire, SG7 5NT  
email: [ashwell@csaenvironmental.co.uk](mailto:ashwell@csaenvironmental.co.uk)

## **APPENDIX SEVEN – ANALYSIS OF CONSULTATION STATEMENT**



## Debenham Neighbourhood Plan

### Consultation Statement

#### Summary

- It appears the Consultation Statement is a highly contrived document that has been selective in its content and representation.
- It is clear that Phase 2 of the consultation (Reg 14 Stage), was used as an opportunity to instigate opposition to a particular planning application (land north of Gracechurch Street, post the submission of the outline application, ref: DC/17/06293) which is contrary to the ethos and purpose of both Neighbourhood Planning and localism.
- There is contradiction with many respondents opposed to 295 dwellings off Gracechurch Street, which has been tested through an application process, while they are prepared to accept 316 dwellings across other sites that have not been tested and may not be deliverable.
- There is no reference to the discussions and submissions made to the draft DNDP made by Suffolk County Council (SCC), notably including the highways and education advice, which has been surprisingly omitted and ignored.
- Therefore, it is clear the Consultation Statement helps to prove the DNDP is flawed in its:
  - a) approach, (being used as a vehicle to stop particular planning application);
  - b) procedure (selecting which submissions and advice to listen to, and which to ignore; and
  - c) content (identifying issues, such as highways, education, flooding, but then not including anything to address them).
- The DNDP is contrary to National Policy and is therefore contrary to Basic Condition (a).

#### Introduction

The supporting “Debenham Neighbourhood Plan – Consultation Statement” carefully outlines the 2x distinct phases of engagement in the preparation of the Debenham Neighbourhood Plan. Phase 1 includes the gathering of information, in terms of the needs, desires and aspirations of the local community (through meetings, surveys, leaflet drops, and drop-in sessions that took place 2012-17). Phase 2 seeks to test the draft Neighbourhood Plan (Regulation 14 Stage, carried out during 2018).

It is noticeable that the work carried out in Phase 2 during 2018, carries significant reference to either ‘Taylor Wimpey’, ‘the development’, or the land north of Gracechurch Street, post the submission of the outline application (ref: DC/17/06293).

In terms of our wider response to the Debenham Neighbourhood Plan we have sought to analyse and question the submitted Consultation Statement, and conclude by asking if a) it is a true reflection of the comments received; and b) if the issues raised have been addressed in the final Neighbourhood Plan document.

#### Phase 1

##### *Drop-in and Presentation Sessions*

It is useful to note that parking and traffic issues were identified very early in the process through the drop-in and presentation sessions, with the Gracechurch Street and High Street junction being identified as a key area of concern. Equally, the area outside of the High School and in the vicinity of

the Primary School. However, we can find nothing within the draft DNDP that actively seeks to tackle and address these issues, and these particular traffic areas head-on. Therefore, despite being an issue identified early on in the process, the DNDP remains silent on a solution.

The development of land north / south of Gracechurch Street would directly provide the opportunity to look to address these identified traffic concerns. Indeed, the current planning application for Land North of Gracechurch Street has offered direct solutions and mitigation measures for these areas that has been discussed and agreed with SCC Highways. This includes a combination of signage, road markings, waiting restrictions, and physical provision (such as the potential to provide a staff car park for the High School on Taylor Wimpey land). The land to south of Gracechurch Street, that wraps around the High School, could have a direct influence on the traffic in that area.

This represents a prime example of where the community have correctly identified a local issue, that a particular site or sites can deliver a solution, which has then not been properly addressed by the DNDP. This is a failing of this document.

### **Online Surveys**

It is interesting to note from the online surveys carried out in 2015-16, that the 5x most important facilities or enhancements identified included both parking and flooding. The Taylor Wimpey sites being promoted at Gracechurch Street have the opportunity to directly tackle both of these, as demonstrated by the opportunity for potential parking associated with the High School, and both flood alleviation and attenuation measures that would be provided by the outline application (ref: DC/17/06293). None of the other sites have been tested in this fashion, therefore it remains unclear they will be able to achieve anything to the same degree, if indeed they are deliverable in the first instance.

It is noted that over half of the respondents to the online surveys wanted to see more housing for Debenham, with a sizable amount recognising the benefit of allocating larger sites through the Neighbourhood Plan process.

The concerns of 'over development' vs a 'lack of infrastructure' are made apparent in the comments contained in the Consultation Statement, also identified as part of Phase 1. However, the DNDP does not provide any solution to the conundrum. By not considering larger sites, the DNDP is actively seeking to avoid 'over development', but at the same time it does not appear to be understood that any development, even small-scale development, will have an impact on the existing lack of infrastructure of the village. The alternative would be to work closely with developers, and both the District and County Council to deliver a large site that a) delivers the necessary homes; and b) contributes appropriately to the necessary infrastructure. Without a careful approach, this balance will never be achieved, and a lack of housing will perpetuate the lack of infrastructure.

### **Phase 2**

#### **Regulation 14 Consultation Log**

We have sought to include a selection of comments from Phase 2 Regulation 14 Consultation Log below, which we feel are of interest. They either raise issues that would relate to any form of future development in Debenham (such as flooding, highways, or education); specific issues that the sites off Gracechurch Street could directly address; or specific reference to the existing outline application (which should not be the purpose of a Neighbourhood Plan). These are only intended to be a selection, to illustrate that Neighbourhood Plan is not fulfilling its proper role and purpose.

|    |  |   |   |
|----|--|---|---|
| 9  | I think the plan is ridiculous. The schools will not have enough space, traffic congestion will occur and there simply isn't enough facilities and room in Debenham for all those houses.  | The Government has made it clear that villages such as Debenham will be required to accommodate a growth in housing numbers. The emerging joint local plan for Babergh and MSDC, has yet to determine the actual number of houses for the village, but an estimate in the Neighbourhood Plan has been proposed. The infrastructure that will be required for both the existing and future needs must be reflected in any new development. | None  |
| 14 | Debenham is a village and not equipped to become a small town. The infrastructure does not allow for such a large development. All our services are over subscribed as it is.  | Infrastructure has been strengthened in the revised Neighbourhood Plan.   | Section 7 of the NP has been strengthened. Pages 42 and 43 refer. |
| 44 | The plan is thorough and considers all of the issues facing the village apart from providing solutions to the traffic and parking problems that already blight the village centre and roads through and around it. The only option other than large-scale development, that includes a new primary school, health centre and shopping facilities with adequate onsite parking, is to narrow the pavements and use green space in the village to provide parking that meets the needs of local businesses, home owners and visitors and allows two lanes of traffic to flow through the village. Such drastic measures would further erode the historical character of Debenham, but with limited on-site parking at the Coop and none to serve the pubs, new hairdressers and other businesses, it is the residents who suffer most due to the demand for parking far exceeding the supply.<br>Noted | Noted   | None  |
| 53 | I feel having this development of nearly 300 new homes the council have not taken into account the existing amenities that are available and access to them as they are already full to the  | Noted   | None  |

|     |  |       |      |
|-----|--|-------|------|
|     | <p>brim. The amount of traffic that uses the high street already presents a problem to park, as well as, to drive through, due to the amount of coaches, lorries and large cars trying to go past parked vehicles or providing domestic services for example, delivering furniture, food etc., It is a worry that the emergency services will be unable to access or have been delayed to assist due to more vehicles being on the road. The flooding on the roads throughout Debenham also has an impact on the village where traffic needs to divert and this will become compounded with yet further vehicles added. I appreciate and completely understand we need more housing but the council need to take in consideration and understand the impact this will have on the village which is already struggling to provide the existing population and surrounding villages.</p> |       |      |
| 66  | <p>We cannot let this development in Gracechurch street go ahead. Danger to the public i.e. more traffic which the roads cannot take now and the pathways cannot be altered in any way as we are an historic village there is no room. Parking is an issue, also negative impact on the landscape. Pressure on our local Doctors surgery full! schools are full - children will have to travel elsewhere as will their parents as there are no jobs available in the village. Flooding will become an issue to residents along Derry brook!</p>  | Noted | None |
| 68  | <p>Flooding will be a big issue if the Taylor Wimpey site goes ahead in Gracechurch street also the volume of traffic, we cannot take any more. The highways in and around the village are already failing. The pathways cannot be made any larger because we are a historic village. What about the landscape such a negative impact. The schools are full so are the doctors. Education will suffer the schools are forced to take more students. The grants are not available as it is.</p>   | Noted | None |
| 119 | .....  | ..... | None |

|     |   |  |      |
|-----|---|--|------|
|     | <p>My reasoning behind this is that many of the objections raised against the Taylor Wimpy proposal are still valid in all of the other areas that are potential sites for development.</p> <p>Flooding is an ever present issue, particularly in Low Road, and schools, infrastructure and traffic issues, parking etc will be the same wherever any large scale developments are built.</p> <p>....</p>   |  |      |
| 123 | <p>The Environment Agency is building 3 holding ponds in the Deben catchment area upstream of Debenham as part of the currently identified strategy to minimise flooding. Any site development in Debenham has to have a Flood Risk Assessment with mitigating measures (basically a holding pond) to cope with a once in 100 years event with a 40% uplift to cover global warming. This has been done for the Taylor Wimpey proposal. As with the other holding ponds, if there were to be no development of the site, the measures would be described as flood risk reduction measures. They should still be, as the only difference is that the holding ponds have to be bigger to cope with the increased run-off, the principle still stands.</p> | Noted  | None |
| 128 | <p>Debenham hasn't the schools/roads/doctors/shops or the room for any more houses. There is no local work nearby, meaning those how would live in the new houses would have to travel. 15 years ago, when last lot of homes build, we were promised better schools and better doctors. It didn't happen, it would be same again.</p>   | Neighbourhood Plan will seek to address the 'infrastructure' needed with any future development, through the Community Infrastructure Levy and Section 106 arrangements. | None |
| 141 | <p>If because of your support and advise to promote sites other than the proposal by Taylor Wimpy you cause, as a result of your maladministration, distress to my property, stood here since 1700, I shall have to take advice.</p>  | Noted.   | None |
| 166 | <p>...<br/>I am also worried about the NP's relationship with the draft District Plan</p>   | The Neighbourhood Plan, cannot be definitive on the precise number of homes that   | None |



|     |   |   |             |
|-----|---|---|-------------|
|     | <p>which recommends different sites and hope that there is an ongoing dialogue with the local planning authority.</p>   | <p>the village will need to accommodate, until such time as both the Government legislates, and the District Council has its emerging Plan approved. In the interim period an assessment has been made, which if approved will seek to provide the necessary number of houses on the first two sites, in sequence, and may not require the third site to be used.</p> |             |
| 169 | <p>I object to the planning development in Gracechurch Street due to the amount of traffic it would have to take, also the amount of housing. We are a village after all! My main concern is cause of flooding which will be a serious issue if built. It is on a hill, the amount of water draining into the village will be catastrophic, we are in a valley! It's a high risk area already, more housing more flooding. If building has to commence a small amount of housing to south side of the village as we can't cope with the amount of concrete and water per acre to flood the village of Debenham.</p> | <p>Noted.</p>   | <p>None</p> |
| 172 | <p>Impact of flooding greatly increased by any development on to Low Road. Why does Debenham require so many houses - minimum 84 by 2036, see 4.12 plan. Doctors, schools, roads all unable to cope - where in the plan is this provided?</p>   | <p>Noted.</p>   | <p>None</p> |
| 175 | <p>The problem with the plan is that although there is acknowledged need for affordable housing there is no indication of where this might be included. The proposed sites for development all have considerable scope for many more houses than the number deemed as required by 2036 (84) and as such will have much the same impact on the size and nature of the village as the proposal by Taylor Wimpey. The impact of this development on the village is one of the main reasons for being against the</p>   | <p>Both issues of 'affordable housing' and 'infrastructure' are covered elsewhere in the responses, suffice to say that they are now strengthened in the Neighbourhood Plan in accordance with the community's wishes.</p>  | <p>None</p> |

|     |  |  |      |
|-----|--|--|------|
|     | <p>proposal. Flooding is still potentially a problem even on the south side of the village. Low Road floods during times of heavy rain, the drains are full all the time and this results in water converging at the junction by River Close / The Cherry Tree. The plan is very detailed and well thought out but the Debenham infrastructure, services, jobs, schools and other basic requirements will absolutely not cope and these issues must be the first ones to be addressed, certainly before any more development takes place.</p>  |  |      |
| 222 | <p>...<br/>I have been looking at the weekend rush of comments in respect of the Taylor Wimpey planning application and see that many people are expressing support for the draft NP, in particular the three proposed future housing sites. Subject to what I have said in my earlier email I, of course, welcome this. But I have an additional worry in that it seems to be being assumed that any of these three sites will minimise the potential for flooding. I do not have any evidence, other than personal observation, but I'd be surprised if the water that comes alongside Aspull Road is less significant than that which comes from the direction of The Butts. It certainly looks that way when seen from the pavement next to the bridge. The details/size of whatever development is proposed would also be relevant making it very hard to generalise in respect of the future. I just think all this emphasises the need for care when drafting the post consultation NP.<br/>...</p> | Noted.   | None |
| 236 | <p>The plans within the Neighbourhood plan do not allow for the growth that is needed. I am in full agreement that the Taylor Wimpey proposal is too large and not suitable for the village but the NP is the other end of the scale. A compromise in the middle is required to allow for appropriate growth to meet</p>   | <p>The Neighbourhood Plan does indeed address the issue of growth and proposes a number of new homes that is realistic and achievable, and in accordance with the emerging joint local plan.</p> | None |

|     |   |  |                                     |
|-----|---|--|-------------------------------------|
|     | the need but also to protect the heritage and services within the village.  |  |                                     |
| 255 | Infrastructure not good enough i.e. roads in particular, shops, parking, School size, jobs.   | Noted.   | Infrastructure section strengthened |
| 260 | I totally agree with the Taylor Wimpy proposal as we need as much housing as possible for the next generation.  | Noted.   | None                                |
| 277 | ...<br>Debenham High School is already full, so is the primary school. One of my children already has to be taxied out to a school outside the village. The demand for school places isn't sustainable with the potential plans muted. So even more demand will then be placed on the roads.<br>...   | Noted.   | None                                |
| 387 | ...<br>I would also comment that I think that some of the sites the Plan identifies as preferred for development might actually add to traffic congestion in the village by bringing traffic through the centre of the village (as opposed to the Taylor Wimpey proposal?) in order to access village amenities/join roads out of the village towards the most likely areas of employment.<br>... | The issue of infrastructure has been improved in the Neighbourhood Plan.<br>.... | None                                |

### Statutory Consultee Comments

It is notable that [Historic England](#) recommended a Strategic Environmental Assessment be undertaken. It is therefore questioned why that wasn't taken earlier in the process, and also raises the question of what else the Parish Council and Neighbourhood Plan Group may have missed or overlooked in their haste to progress the DNDP. Simply because this is a document prepared by a local community does not mean it is above planning law and statutory requirements. It is also noted that Historic England advised working closely with conservation and archaeology staff from the relevant organisations. Did this take place, and where is the evidence of this?

It is noted that NHS England state in their response:

*"The plan identifies preference for housing developments with smaller numbers of dwellings rather than large developments. Please bear in mind that the planning obligations that can be gained from larger number of smaller developments will not always have as much benefit as one large development. This will limit the options available for the provision of additional community infrastructure to be delivered as part of a scheme and NHS England have limited funding available to invest in creating additional capacity as a result of development growth."*

It is also noted that Mid Suffolk District Council made it quite clear that the Debenham Neighbourhood Plan was running ahead of the emerging Local Plan:

*“The Council is currently considering the responses received to last year’s Joint Local Plan consultation and is anticipating further consultation shortly. This will include consultation on a preferred spatial strategy and the distribution of housing. As you will appreciate it is not possible to provide certainty on the likely requirement for Debenham at present but a figure higher than that currently provided for in the Neighbourhood Plan cannot be ruled out. The Council will therefore work closely with the Parish Council and the Neighbourhood Plan Group to ensure that there is consistency between the Neighbourhood Plan and the emerging Joint Local Plan.”*

It is noted that landowner / agent (8) “it is clear that there are infrastructure issues within the village”, and that “the plan doesn’t seem to offer any structured solutions to the current problems that exist”.

It is interesting to note that Gladman share our view that the DNDP as drafted does not conform with national policy and guidance, and is therefore not in compliance with Basic Condition (a).

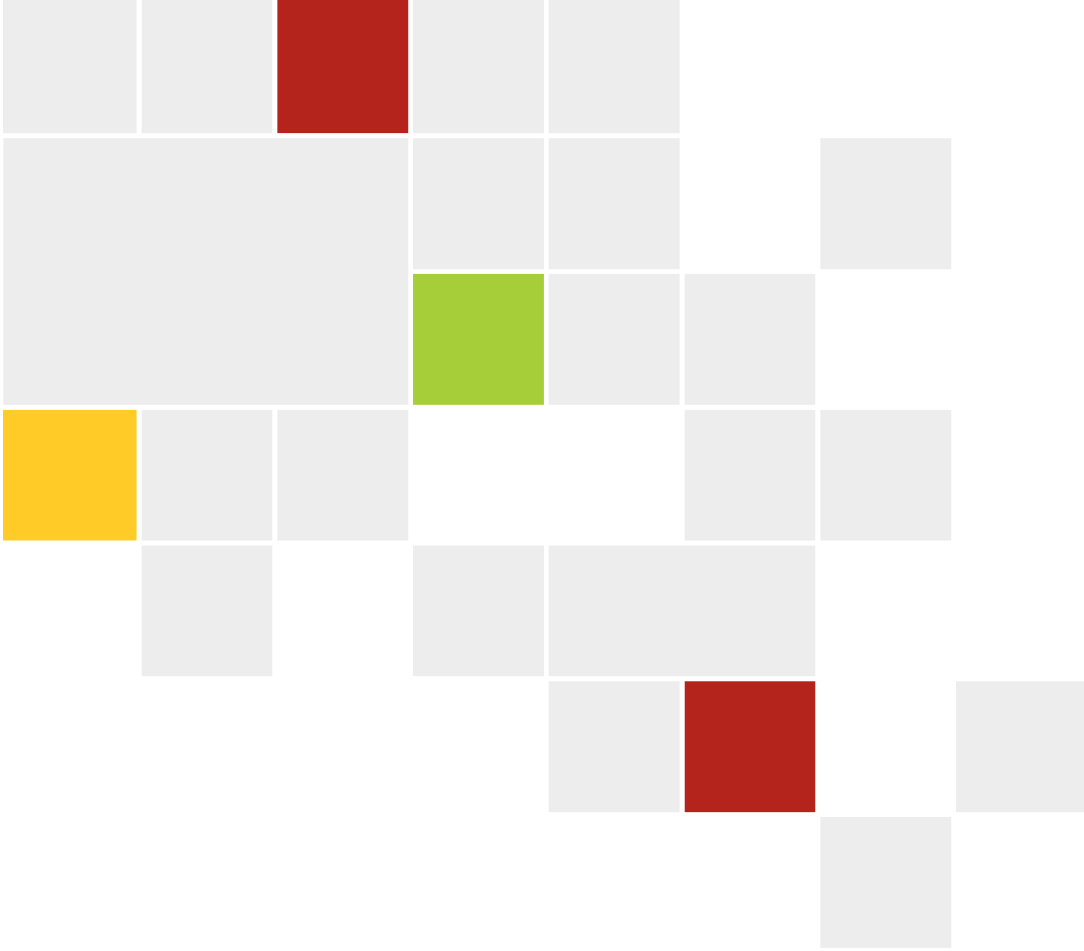
### **Conclusion**

It is useful to note that the engagement process undertaken during the preparation of the DNDP has clearly identified a significant number of locally important issues. However, the DNDP fundamentally fails to deal with the difficult decisions, they themselves have identified, in a direct manner.

Instead, it is suggested that the DNDP has been purposefully constructed to seek to halt a single site being brought forward that has already demonstrated a) its deliverability, (via the current outline application); b) its suitability, (with no objections being received from the necessary statutory consultees to the application); and c) its potential to address the very issues that have been identified by the residents of Debenham themselves.

This ‘protectionist’ approach is not the intention of a Neighbourhood Plan, or ‘Localism’ within the National Policy and the NPPF. It does appear that the Debenham Neighbourhood Plan is flawed, and has been prepared on an ‘unsound’ basis, which would suggest it should not be submitted to the Planning Inspectorate at this stage for an independent assessment.

It is clear education, and notably the capacity at the High School, is an existing issue. This has been identified by residents, but more importantly by SCC Education. Therefore, any further development will have an impact on the High School capacity. The proper planning process requires that solutions should be provided, tested, and agreed in advance, before sites are able to come forward for development. This happens through the rigorous testing of planning applications, and should equally happen through site allocations. Otherwise, we will find ourselves in the situation where either a) existing infrastructure problems become worse; or b) sites are not delivered, therefore there is the potential for Plans to become vulnerable, and out-of-date, which has wider implications if 5-yr housing land supply targets cannot be met. The time to get this right is now – not test it later.



# Boyer

15 De Grey Square, De Grey Road, Colchester, CO4 5YQ | 01206 769 018  
colchester@boyerplanning.co.uk | boyerplanning.co.uk