

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

Recipient Email: planning.help@westsuffolk.gov.uk

Recipient Address:

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Development Management
West Suffolk House
Western Way
Bury St Edmunds
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IP33 3YU

For the attention of: Charlotte Waugh

Dear Charlotte Waugh ,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/25/1099/RM

PROPOSAL: Reserved matters application - submission of details under outline planning permission DC/15/2151/OUT - appearance, landscaping, layout and scale for 198 dwellings (parcels A3 and A5) and associated internal roads, car parking, landscaping, amenity and public open space and diversion of overhead HV cable b. application to partially discharge conditions 4, 6, 7, 8, 9, 28, 40, 41, 42 and 45

LOCATION: Land Ne Haverhill English Way Haverhill Suffolk

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application Ref: DC/25/1099/RM and the following submitted documents and we recommend a **holding objection** at this time:

- Drainage Layout – PB8301-RHD-DE-A5-DR-D-0500 – 11th July 2025
- Flood exceedance route – PB8301-RHD-DE-A5-DR-D-0511 REV P02 – 11th July 2025

A holding objection is necessary because additional information is required for the LLFA to assess the application.

The holding objection is a temporary position to allow reasonable time for the applicant and the LLFA to discuss what additional information is required to overcome the objection. This Holding Objection will remain the LLFA's formal position until the local planning authority (LPA) is advised to the contrary. If the LLFA position remains as a Holding Objection at the point the LPA wishes to determine the application, the LPA

should treat the Holding Objection as a Formal Objection and recommendation for Refusal to the proposed development. The LPA should provide at least 2 weeks prior notice of the publication of the committee report so that the LLFA can review matters and provide suggested planning conditions, even if the LLFA position is a Formal Objection.

The points below detail the actions required to overcome our current objection:

1. Submit a surface water drainage strategy that achieves the 4 pillars of SuDS and utilises above ground SuDS wherever possible for collection, conveyance, storage, and discharge, providing multi-functional and benefits. Features such as tree pits, kerbside raingardens, bioretention features can be utilised in dense urban environments and distribute the use of SuDS across the housing parcels.
2. Currently, the swales/basins are extremely close the edge of the highway and tree roots, please show distances of clearance for all SuDS features.
3. Detailed SuDS drawings will need to be included within the drainage strategy, i.e., cross, and long sectional drawings with height, side slopes and water depths all included. All features should be designed in accordance with Suffolk SuDS Guidance.
4. No information has been provided for a site investigation report; this should show a detailed assessment of the current ground conditions on site and include trial pit records. If open SuDS are to be used, infiltration results will need to be shown.
5. Hydraulic drainage calculations should be included to show the entire drainage network. We recommend the use of FEH rainfall model used for the design criteria.
6. A maintenance and management plan for the SuDS is required in the drainage strategy

Yours Sincerely,

Miles Orlopp
Flood & Water Engineer
Growth, Highways and Infrastructure

As a **minimum**, we require the following documents and information to be submitted for each type of planning application or stage with the planning process.

Document to be submitted, and brief description of details required:	Pre- App	Outline	Full	Reserved Matters	Discharge Condition
Details of how the proposed Drainage Strategy will deliver on each of the four pillars of SuDS	✓	✓	✓	✓	✓
Flood Risk Assessment (FZ3 or Site >1Ha) Evaluation of fluvial, tidal, pluvial, reservoir & groundwater flood risk onsite – this will guide layout and location of open spaces. (SCC may require flood modelling if EA Flood Maps are not available)	✓	✓	✓		

Contour Plan Assessment of topography/existing flow paths/blue corridors	✓	✓	✓		
Drainage Strategy / Statement Document that explains how the site is to be drained using SuDS principles. Shall include information on: <ul style="list-style-type: none"> Existing drainage (including adjacent highway systems) Impermeable Area (Pre and Post Development), if unknown use conservative estimate e.g., 60% and justify Proposed SuDS, recommended land take of 12-15% of the site if the proposed impermeable area is unknown (see below) Hydraulic Calculations (see below) Treatment Design (i.e., interception, CIRIA pollution indices) Adoption/Maintenance Details 		✓	✓		
Impermeable Areas Plan Plan to illustrate new impervious surfaces and total areas		✓	✓		
Preliminary Layout Drawings (including landscaping details) Indicative drawings of layout, properties, open space, and drainage infrastructure including: <ul style="list-style-type: none"> Existing watercourses to be retained within or abutting the site. 3.5m wide maintenance strip on at least one bankside All existing blue corridors must be retained/enhanced Cross section/plan views of basins; depicting area, side slopes, wet/dry benches, freeboard, and volumes/depths (1:1, 1:30 and 1:100 + climate change allowance) Discharge location (outfall) and invert of receiving body Form of SuDS and location on the site Main above ground conveyance network Maintenance strips/access points Legal easements/no planting zones Soakaway offsets 		✓			
Preliminary Site Investigation Report <ul style="list-style-type: none"> Trial pits across the site to BRE365 with minimum infiltration rate of 10mm/hr. if infiltration is to be the sole method of drainage Associated exploratory logs (including depth to groundwater) Phase 1 Contamination Assessment Report 	✓	✓			
Preliminary hydraulic calculations <ul style="list-style-type: none"> Greenfield discharge Rates (using suitable method i.e., FEH, IH124 (ICPSUDS), ReFH2 Brownfield discharge rates if applicable (methods listed above using soil type 5 or ReFH2 urban catchment method) Storage Volume/Water Depths Long Term Storage (if using complex flow control) Source Control/Sketch Calculations (or similar) 	✓	✓			
Evidence of any agreements to discharge to a third-party system (i.e., Anglian Water or adjacent landowner) Written evidence of any permissions or permits being obtained		✓	✓		
Detailed Development Layout and SuDS Provision Plan Dimensioned plans showing the detailed layout including SuDS, landscaping details, open spaces, and exceedance routes			✓	✓	✓
Full Site Investigation Report			✓	✓	✓

Detailed assessment of ground conditions <ul style="list-style-type: none"> • Widespread coverage of trial pits to BRE 365, proportionate to the scale of the development with a minimum of 2 for the smallest sites • Contamination/Pollution check • Groundwater Monitoring 				
Detailed Drainage Scheme Plan Dimensioned plan showing main aspects of the drainage infrastructure. Plans should include: <ul style="list-style-type: none"> • SuDS details (size/volume) • Pipe Numbers/Sizes/Levels • Outfall & Permitted Discharge Rate (if applicable) 			✓	✓
Detailed SuDS Drawings (Open SuDS) Dimensioned plans of proposed SuDS components i.e., scaled cross sections/long sections			✓	✓
Full hydraulic calculations (MicroDrainage “Network”, Causeway Flow, or similar equivalent output) At this stage, SCC require simulations of the drainage network including SuDS components for 3.33% AEP and 1% AEP+CC storms. (Source Control files are useful but not enough on their own)			✓	✓
Discharge Agreements Agreement to discharge to third party infrastructure if the scheme is reliant on it.			✓	✓
Health and Safety Risk Assessment Where open SuDS (water level >0.3m) are proposed a CDM compliant designers risk assessment will be required.			✓	✓
SuDS Maintenance & Management Plan Plans should include schedules which specify when and how maintenance should be undertaken			✓	✓
Surface Water Construction Plan Plan of how surface water runoff is to be managed during the construction phase, including plans of any temporary drainage.				✓
SuDS Verification Report / Flood Risk Asset Register Form Report based on post construction inspection and containing evidence of compliance and/or changes from the approved design				✓