Your Ref: DC/25/1990/RM
Our Ref: SCC/CON/5563/25
Date: 27 January 2026
Enquiries to: Floods@suffolk.gov.uk

All planning enquiries should be sent to the Local Planning Authority.
Recipient Email: planning.help@westsuffolk.gov.uk

Recipient Address:
West Suffolk Council
Development Management
West Suffolk House
Western Way
Bury St Edmunds
Suffolk
IP33 3YU

For the attention of: Charlotte Waugh

Dear Charlotte Waugh ,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/25/1990/RM

PROPOSAL: Reserved matters application - a. submission of details under outline planning permission DC/15/2151/OUT - means of access, appearance, landscaping, layout and scale for 250 dwellings (including 72 affordable) (parcels A14; and A15); allotments (parcel E2); associated internal roads, car parking, amenity and public open space; pumping station and diversion of overhead HV cable; b. including application to
partially discharge conditions 4; 6; 7; 8; 9; 15; 28; 30; 37; 38; and 44

LOCATION: Land Ne Haverhill English Way Haverhill Suffolk

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application Ref: DC/25/1990/RM and the following submitted documents and we recommend **a holding objection** at this time:

A holding objection is necessary insufficient information has been provided 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. After mentioning this numerous times in preapp discussions, please provide alternative methods of drainage for on plot drainage. A more holistic design approach could ensure that SuDS are multifunctional that deliver treatment more naturally alongside biodiversity and amenity benefits. Features such as permeable paving and SuDS Pods are recommended. Please include an updated drainage layout which show the use of rain gardens within the development.
2. Justification is required for the clearance between the pumping station and the basin. Additionally, what are the lines connected to the pumping station and how will they not affect the basin and access for maintenance.
3. Please consider the use of rainwater harvesting techniques to be utilised on the allotment sites.

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: • 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: • 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 • 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 • 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 • 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: • 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					✓