

From: Hannah Purkis <H [REDACTED]>
Sent: 30 April 2024 14:34
To: Development Management
Cc: Rosalynn Claxton; Benjamin Locksmith
Subject: 2024-04-30 HP Reply Land between Humber Doucy Lane and Tuddenham Lane, Ipswich Ref: 24/00172/OUTFL

Dear Rosalynn,

Subject: Land Between Humber Doucy Lane And Tuddenham Lane, Humber Doucy Lane, Ipswich, Suffolk. Hybrid Application - Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works.

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application Ref: 24/000172/OUTFL.

The following submitted document has been reviewed and the LLFA recommends a **holding objection** at this time:

- Flood Risk Assessment and Drainage Strategy Dated: Feb 2024 Ref: 681058-R1(0)-FRA

A holding objection is necessary because the flood risk assessment and drainage strategy has not fully considered the existing watercourse network around the site and therefore presents a risk of the development having an adverse impact on it and a resultant increase in flood risk on neighbouring sites. The drainage strategy relies on deep infiltration structures which are considered a last resort by SCC LLFA, we recommend a discharge to the watercourse network is fully considered as this is more sustainable than deep infiltration. We also require more SuDS incorporated into the parcels, swales along the main access roads and open/above ground conveyance of surface water from the parcels into the strategic basins before we can recommend approval. These points and other more technical details are listed in the bullet points below.

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

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

Watercourse network

1. A plan of the watercourse network is included in the flood risk assessment and drainage strategy however it is missing some of the watercourses within and/or adjacent to the site. It is of vital importance that the development does not adversely impact the existing surface water network and thus a detailed survey of the existing watercourse network should be undertaken. This should comprise a walkover of the watercourse network and trace each from where it approaches the site, its connectivity through or around it to its outfall beyond the site's boundaries including any culverted sections. The plan should be updated and photos included where necessary. Any required maintenance to the network needs to be highlighted to ensure that the new development will not increase offsite flood risk.

2. There is a watercourse adjacent highway on the eastern parcel that could be adversely impacted by the proposed highway upgrades. Any upgrade works to the existing highway need to be carefully planned in conjunction with existing onsite constraints.

Drainage Strategy

3. The hierarchy set out in the Suffolk SuDS Guide (based on the NPPF and CIRIA SuDS Guide) states that deep infiltration is a last resort and should only be considered once all other options have been fully assessed. Whilst shallow infiltration and a connection to a surface water sewer are understood to be not viable, a discharge to the nearby watercourse network should be considered further. We would encourage a hybrid approach being adopted where surface water is directed to the nearby watercourse network where possible with deep infiltration being used where this is not possible, ie. adjacent the railway line. Constructing deep infiltration structures up to 8m below ground level as is currently proposed requires significant earthworks, is higher risk and less sustainable than surface-based solutions. The deep infiltration structures also increase the risk of discharging pollutants directly into the ground in an area highlighted as being vulnerable to pollution incidents.
4. The greenfield runoff rate has been calculated but is very low compared to the more typical figure of 2l/s/ha that is often used. If a restricted discharge to a watercourse is progressed then this should be reviewed to ensure a viable rate is proposed.
5. Many of the sub catchments use the more traditional pipe to pond approach which does not incorporate above ground conveyance of surface water or address surface water at source. The strategy should be reconsidered to include more SuDS within the parcels, eg. raingardens, downpipe planters, tree pits, permeable paving or swales.
6. The simple index approach has been used to assess the surface water pollution hazard potential however given the number of dwellings, a school and community uses proposed on the site, it is likely that the main distributor road will generate a greater level of pollution than can be assessed using this method. The assessment used only applies to roads with less than 300 traffic movements per day.
7. In accordance with the Suffolk SuDS Guide and Suffolk Design for Streets Guide the main access roads should be drained to roadside swales. Cross sections should be provided to demonstrate how space has been provided to ensure this can be accommodated in the final layout.
8. The school plot will require a connection to services and utilities and this often extends to the SuDS network. It should be confirmed with the schools team if they require a unrestricted discharge into the SuDS network as this may result in a change to the current proposal.
9. The strategic swales and basins should have dimensions provided to demonstrate they are in accordance with the Suffolk SuDS Guide. As many of the parcels are currently shown to be drained by traditional drainage, it is likely that the invert level of the pipes will be too deep to discharge into surface features and this should be considered at this stage to avoid excessive below ground infrastructure being required at the detailed design stage.

Kind regards

Hannah

Hannah Purkis BSc (Hons) MCIWEM C.WEM

Flood and Water Manager

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Please Note: The Suffolk SuDS Guide has been updated (March 2023) and is available [here](#).

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