

7 January 2020

Mr Vincent Pearce
Senior Planning Officer
Mid Suffolk District Council
Endeavour House, 8 Russell Rd,
Ipswich, IP1 2BX

Dear Mr Pearce,

Planning application ref: DC/19/05769 Outline Planning Application. (Access to be considered) Erection of up to 295 dwellings, 2ha for potential primary school site or community/care use, and two new vehicular accesses from Gracechurch Street. Associated developments including flood alleviation and surface water attenuation features, distributor road, associated public open space, landscaping and other infrastructure and utilities.

Land to the North of Gracechurch Street Debenham Suffolk

I am writing on behalf of the Suffolk Preservation Society (SPS) to object the above outline planning application for the erection of up to 295 dwellings on a greenfield site on the western edge of the village. This is a resubmission of application DC/17/06293 which was refused in December 2018. SPS objected to the previous application due to the harmful impacts upon the character of the landscape; the impact of traffic on heritage assets in Gracechurch Street within the conservation area; and its departure from the emerging Debenham Neighbourhood Plan (DNP). The current application is essentially unchanged and SPS maintains its objection with regards to the scheme's detrimental impacts on the landscape and the heritage of Debenham, as set out in our letter dated 26 February 2018 (attached).

Previous decision

At the time of determination of the 2018 application, MSDC could not demonstrate a 5 years' housing land supply and, in addition, policies within the local plan were deemed not compliant with the NPPF and were therefore out of date. The presumption in favour of sustainable development was therefore triggered and the case officer recommended approval of the application. At 295 dwellings, the scheme would have made a significant contribution the District's housing supply.

In addition, the DNP was not yet made and its policies, whilst fully considered, were afforded reduced weight. However, contrary to the recommendation, the application was refused at committee as:

- The development would adversely and unacceptably impact upon the natural, built and historic environment and would cause serious harm to the key features and future enjoyment by the community of highly valued views over the open valley landscape
- The scale of development would be disproportionate relative to the level of growth allocated and planned for in the emerging Neighbourhood Plan. This would prejudice the plan making process by undermining the plan-led approach in safeguarding this valley landscape and ensuring that key features can continue to be enjoyed.
- Granting planning permission would undermine community confidence in the plan making process after successful Examination but in advance of a referendum on that Plan.

Plan-led system

Applications for planning permission are required to be determined in accordance with the development plan. The Debenham Neighbourhood Plan was 'made' in 2019 and now forms part of the development plan and should be therefore afforded full weight in the consideration of the resubmitted scheme. Moreover MSDC is now able to demonstrate a 5 year supply of housing land and therefore the presumption in favour of sustainable development does not apply and applications should be determined according to the development plan. Should the housing figure be contested, where the Neighbourhood Plan is recently made and includes allocations and housing policies, the NPPF at para 14 is clear that *the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits.*

Debenham Neighbourhood Plan

The proposed scheme is contrary to the Debenham Neighbourhood Plan which, having considered the merits of this site for housing development, excluded it in preference to alternative viable sites (policies DEB3, DEB4 and DEB5). Para 4.24 explains that *the scale of development 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 (i.e. upstream of village centre).*

Whilst the selected allocated sites were challenged at Examination by the applicant, the Inspector at para 93 accepted that they would provide for the required housing growth in the village: *Subject to my comments with regard to the details of the site-specific allocations below, I consider that the allocated housing sites meet the Basic Conditions. Thus, I do not consider it necessary for the inclusion of additional, or alternative, sites.* This application proposes a further 295 dwellings for Debenham, in addition to the approximately 350 dwellings deliverable across the allocated sites in the Neighbourhood Plan. SPS considers that this is disproportionate to the size of the village and the anticipated level of its growth.

Moreover DEB19 requires all developments to have a *positive and distinctive character by designing the development to respond to site features such as views into or out of the area, trees landscapes, and existing buildings.* This includes highly valued views which have been identified across the site

from Gracechurch Street. Whilst we acknowledge the applicant's assurance that the impact on key views has been addressed through alterations to the site layout to incorporate open spaces, and the relocation of the proposed primary school or community use to the north western part of the site, it remains that the introduction of a housing estate into these views will have a significant detrimental impact on them. Moreover the suggested amendments merely address, in part, views from Gracechurch Street and do not take into account the visual impact of developing the slopes when viewed from the north.

Conclusion

Whilst the site may be capable of delivery and would make a significant contribution to the district's housing supply, the proposal for 295 dwellings in this location is considered to be disproportionate to the size of the historic settlement and will impact the character of the conservation area through a significant increase in traffic. Furthermore, due to the topography of the site, the landscape and visual impacts of a development of this magnitude will result in material harm to the character of the countryside setting of Debenham.

The community, through the neighbourhood plan process, has clearly rejected this site for development whilst setting out alternative sites that are capable of contributing towards the housing need in the district. SPS considers that to approve this application would seriously undermine the neighbourhood planning process and we therefore urge that the proposals are yet again refused.

We trust that you will find these comments helpful in the consideration of this application.

Yours sincerely,



Bethany Philbidge
BSc (Hons) MSc (Town Planning)
Planning Officer

Cc: Debenham Parish Council
Phil Butler, SPS Mid Suffolk District
David Burn, Portfolio Holder, Planning