

From: Dylan Jones
Sent: 29 August 2017 15:19
To: BMSDC Planning Area Team Yellow
Subject: FW: Thurston Development

Can the e-mail below be ldoxed in all of the cases listed in it and also for case 5010/16 which is not listed in there.

Thanks.

Dylan Jones

From: Wilson Hannah [<mailto:hWilson4@anglianwater.co.uk>]
Sent: 21 August 2017 14:06
To: Dylan Jones <Dylan.Jones@babberghmidsuffolk.gov.uk>; 'grahamdixon10@gmail.com' <grahamdixon10@gmail.com>
Subject: Thurston Development

Dear Dylan Jones and Graham Dixon

Our Pre Development engineer has undertaken an assessment of the cumulative impact of all the following proposed developments in Thurston:

2797/16 – 175 dwellings

4386/16 – 138 dwellings

4942/16 - 64 dwellings

4963/16 – 250 dwellings

5070/16 - 200 dwellings

Whilst they will increase the flow in the network, they will not cumulatively cause an unacceptable risk of flooding as the connection points are spread over more than one specific sewer run.

I hope this helps.

Kind regards,
Hannah Wilson
Pre-Development Planning Manager

Developer Services
Anglian Water Services Limited
Tel Office: 0345 0265 458

Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT
www.anglianwater.co.uk



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From: RM Floods Planning
Sent: 22 August 2017 08:39
To: BMSDC Planning Area Team Yellow
Cc: Dylan Jones
Subject: 2017-08-22 JS reply Land On The West Side Of Barton Road, Thurston IP31 3NT Ref 4386/16

Dear Dylan Jones,

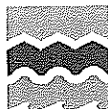
Subject: Land On The West Side Of Barton Road, Thurston IP31 3NT Ref 4386/16

Suffolk County Council, Flood and Water management have no further comment to add.

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864



Historic England

EAST OF ENGLAND OFFICE

Mr James Platt
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582738

Our ref: P00538167

22 August 2017

Dear Mr Platt

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND ON THE WEST SIDE OF BARTON ROAD, THURSTON, IP31 3NT
Application No. 4386/16**

Thank you for your letter of 16 August 2017 regarding the above application for planning permission. On the basis of the information available to date, in our view you do not need to notify or consult us on this application under the relevant statutory provisions, details of which are enclosed.

If you consider that this application does fall within one of the relevant categories, or you have other reasons for seeking our advice, please contact us to discuss your request.

Yours sincerely

Clare Campbell

Principal Inspector of Historic Buildings and Areas

E-mail: clare.campbell@HistoricEngland.org.uk

Enclosure: List of applications requiring consultation with and notification to Historic England

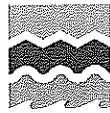


24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



Historic England

EAST OF ENGLAND OFFICE

Planning and Listed Building Consent applications requiring consultation with and notification to Historic England (the Historic Buildings and Monuments Commission for England) April 2015

Applications for planning permission

Historic England must be consulted or notified (see note 1) of the following planning applications by virtue of the following provisions:

Consultation:

Development which in the opinion of the local planning authority falls within these categories:

- P1 Development of land involving the demolition, in whole or in part, or the material alteration of a listed building which is classified as Grade I or II*
- P2 Development likely to affect the site of a scheduled monument
- P3 Development likely to affect any battlefield or a Grade I or II* park or garden of special historic interest which is registered in accordance with section 8C of the Historic Buildings and Ancient Monuments Act 1953

Basis for this - Town and Country Planning (Development Management Procedure) (England) Order 2015 - article 18 and Schedule 4.

- P4 Development likely to affect certain strategically important views in London

Basis for this - Secretary of State for Communities and Local Government Directions relating to Protected Vistas 2012

Notification:

Development which the local authority (or Secretary of State) think would affect:

- P5 The setting of a Grade I or II* listed building; or
- P6 The character or appearance of a conservation area where
 - i) the development involves the erection of a new building or the extension of an existing building; and
 - ii) the area of land in respect of which the application is made is more than 1,000 square metres

Basis for this - Planning (Listed Buildings and Conservation Areas) Regulations 1990 - regulation 5A (as amended by The Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations 2015)

- P7 Local authority/ies own applications for planning permission for relevant demolition in conservation areas. (see note 2)

Basis for this - Town and Country Planning General Regulations 1992 (as amended by the Town and Country Planning General (Amendment) (England) Regulations 2015)

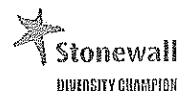
Note 1: There is a difference between Consultation and Notification. When LPAs consult on applications, there is a duty to provide a substantive response to the LPA within 21 days. A notification from the LPA is to enable representations to be made if we so wish, and to respond within 21 days. Historic England does not make a distinction in its handling of advice work.

Applications for listed building consent

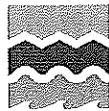


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Historic England

EAST OF ENGLAND OFFICE

Historic England must be notified of the following applications for listed building consent by virtue of the following provisions:

Notification:

- L1 For works in respect of any Grade I or II* listed building; and
- L2 For relevant works in respect of any grade II (unstarred) listed building

(relevant works means:

- i) works for the demolition of any principal building (see note 3);
- ii) works for the alteration of any principal building which comprise or include the demolition of a principal external wall of the principal building; or
- iii) works for the alteration of any principal building which comprises or includes the demolition of all or a substantial part of the interior of the principal building.

For the purposes of sub paragraphs ii) and iii) above:

- a) a proposal to retain less than 50% of the surface area of that part of a principal building represented on any elevation (ascertained by external measurement on a vertical plan, including the vertical plane of any roof) is treated as a proposal for the demolition of a principal external wall;
- b) a proposal to demolish any principal internal element of the structure including any staircase, load bearing wall, floor structure or roof structure is treated as a proposal for the demolition of a substantial part of the interior.)

- L3 Decisions taken by the local planning authorities on these applications

Basis for this - Arrangements for handling heritage applications - Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015 - made under section 12, 15 (1) and (5) of the Planning (Listed Buildings and Conservation Areas) Act 1990

Historic England
15 April 2015

Note 2: Relevant demolition is defined in section 196D of the Town and Country Planning Act 1990 as "demolition of a building that is situated in a conservation area in England and is not a building to which section 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990 does not apply by virtue of s75 of that Act (listed buildings, certain ecclesiastical buildings, scheduled monuments and buildings described in a direction of the Secretary of State under that section.)

Note 3: "principal building" means a building shown on the list compiled under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and includes (unless the list entry indicates otherwise) any object or structure fixed to that building, but does not include any curtilage building.



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Your ref: 4386/16
Our ref: Thurston – land on the west side of
Barton Road 00046430
Date: 23 August 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Mr Dylan Jones,
Growth & Sustainable Planning,
Mid Suffolk District Council,
Council Offices,
131 High Street,
Needham Market,
Ipswich,
Suffolk,
IP6 8DL

Dear Dylan,

Thurston: land on the west side of Barton Road 4386/16 – developer contributions

I refer to the planning application for the erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space.

Reason(s) for re-consultation: The scheme has been revised to 137 dwellings. This consultation response updates and replaces the consultation response letter dated 20 February 2017.

This consultation response mainly deals with the need to address early years and education mitigation directly arising from the cumulative impacts of developer-led housing growth in Thurston. Suffolk County Council's (SCC) view is that appropriate mitigation from each of the 'live' planning applications is to be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In those instances, for which SCC requests a planning obligation they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published CIL 123 List.

I set out below Suffolk County Council's response, which provides the infrastructure requirements associated with this planning application and this will need to be considered by Mid Suffolk District Council. This consultation response considers the cumulative impacts on education arising from existing planning applications which, when including the 137 dwellings from this proposed development, amount to a total of 847 dwellings.

The County Council recognises that the District currently do not have a 5-year housing land supply in place, which means that paragraph 49 of the NPPF is engaged which in turn relies on paragraph 14 whereby the presumption is in favour of sustainable development. This is the golden thread running through plan-making and decision-taking.

The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

The County and District Councils have a shared approach to calculating infrastructure needs, which is set out in the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk'.

Mid Suffolk District Council adopted their Core Strategy in September 2008 and Focused Review in December 2012. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 6 seeks to ensure provision of adequate infrastructure to support new development; this is implemented through Policy CS6: Services and Infrastructure.
- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule on 21st January 2016 and will charge CIL on planning permissions granted from 11th April 2016. Regulation 123 requires mid Suffolk to publish a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL.

The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Provision of passenger transport
- Provision of library facilities
- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

As of 06 April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy.

The requirements being sought here would be requested through S106A contributions as they fall outside of the CIL 123 List.

The details of the site specific S106A requirements related to the proposed scheme are set out below:

1. **Education.** Refer to the NPPF paragraph 72 which states 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

The NPPF at paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

School level	Minimum pupil yield:	Required:	Cost per place £ (2017/18):
Primary school age range, 5-11*:	33	33	16,429
High school age range, 11-16:	20	0	18,355
Sixth school age range, 16+:	4	0	19,907

Total education contributions:	£542,157.00
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The local catchment schools are Thurston Church of England Primary Academy, Ixworth Free School, and Thurston Community College.

Primary School

SCC forecasts show that there will be no surplus places available at the catchment primary school to accommodate any of the pupils anticipated to arise from this proposed development. The Primary School site is landlocked and cannot be permanently expanded.

The County Council has been in discussions with the Parish Council regarding the emerging Thurston Neighbourhood Plan and has provided pupil yields and possible strategies to deal with mitigation from the growth scenarios being assessed.

For several compelling reasons including improving education attainment, community cohesion and sustainability the highly preferred outcome is for those

primary age pupils arising from existing and new homes within the community to be able to access a primary school place in Thurston. Where pupil bulges are anticipated the County Council will consider the provision of temporary classrooms but such an approach is only viewed as an interim measure if the longer term pupil forecasts indicate the need for permanent provision (by way of school expansion or a new school). Only as a last resort will the County Council consider offering places to pupils at out of catchment schools but this is a far from ideal strategy and should only be considered for a very temporary period because there are several significant dis-benefits including negative impacts on education attainment, community cohesion, sustainability, and costs. It is for the District Council to weigh up these important matters in considering the planning balance when deciding whether to allow or refuse planning permission.

Due to the current uncertainty over the scale, location, and distribution of housing growth in the Thurston locality it is not clear now whether the most sustainable approach for primary school provision is to:

- a. Retain a single primary school for the village by relocating and delivering a new larger school; or,
- b. Retain the current primary school and deliver a second (new) primary school for the village.
- c. Whichever strategy is the most appropriate a site of a minimum size of 2.2 hectares will need to be identified and secured. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs).
- d. In the short term the head teacher has agreed to the siting of a temporary double mobile classroom for 60 pupils. However, this is strictly on the understanding that such mitigation is only of a limited and temporary nature ahead of determining either a. or b. above.
- e. Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 33 primary age pupils forecast to arise from the proposed development is calculated as follows

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- $\text{£6.9m} / 420 \text{ places} = \text{£16,429 per pupil place}$
- From 137 dwellings it is forecast that 33 primary age pupils will arise
- Therefore $33 \text{ pupil's} \times \text{£16,429 per place} = \text{£542,157 (2017/18 costs)}$

Assuming the cost of the site for the new primary school, based on a maximum

cost of £100,000 per acre (£247,100 per hectare), is £543,620 for a 2.2-hectare site and equates to £1,294 per pupil place. For the proposed development, this equates to a proportionate land contribution of 33 places x £1,294 per place = **£42,702.**

At present two planning applications (under references 5070/16 and 4963/16) include land identified for education use but planning permission for neither site has been granted permission by Mid Suffolk District Council. It is therefore suggested that consideration be given to imposing an appropriate planning condition restricting occupation of any dwellings once the capacity of the existing primary school with additional temporary classroom are full. This condition can be discharged once construction of the new primary school has commenced. This recognises the importance that the Government attaches to education provision as set out in paragraphs 38 and 72 of the NPPF.

Temporary classroom costs

The physical constraints of the existing primary school site mean that a permanent expansion of the school is not possible. Therefore, temporary arrangements will need to be put in place to accommodate the additional pupils arising from new homes.

The DfE publishes Area Guidelines (Building Bulletin 103) for schools which define the minimum areas of school buildings, playing fields, site etc. Thurston Church of England Primary Academy is on a very small site with no possibility of expanding its boundary. It has a capacity of 210 places (1 form of entry) so according to the guidelines its minimum site area (including playing fields) should be 11,220 sq m. It has a site area of 11,169 sq m including a proportion of the adjacent village field (managed by the Village Playing Field Trust) and is therefore below the minimum site area for a school of this capacity. Therefore, no more accommodation technically can be added to the school and no money will be spent on any permanent accommodation. However, schools can take on extra pupils arising as a "bulge" by providing temporary classrooms. This might happen if there is a sudden spike in the local population, or as in this case, due to new housing developments providing it is only temporary until permanent places are provided elsewhere like a new school.

The Primary School does not have its own grass playing field. It can use the adjacent playing field owned and managed by the Trust. The school agrees only to use half of it. Installing a double mobile (providing 60 places) may mean it is located on an area of hard play which would reduce the area of playing field available to the increased number of pupils. So in absolute and relative terms the area of playing field would reduce i.e. more pupils at the school sharing less outdoor play area. It is therefore preferable to locate a temporary classroom on non-playing field land within the school site, such as part of a car park.

A Feasibility Study has been commissioned to assess whether the existing school site has space to accommodate this temporary expansion and it has confirmed it is possible.

As an Academy the County Council has limited control over their decision whether to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would have limited powers to impose this on them. Iain Maxwell (Assistant Senior Infrastructure Officer in SCC's, Children, and Young People Service) met with the Head teacher and 3 Governors on Thursday 26th January 2017 to explain the situation. Although there were reservations from the school the overall response was to accept in principle the installation of the temporary classroom if it was needed, providing there was evidence that the new school would be built and open in the early stages of the housing developments to minimise the length of time the temporary building would remain on site. Formal acceptance in writing from the school has now been received.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction commencing on the new school early on. The costs between renting and buying are comparative. At this stage SCC doesn't know how many additional houses the District Council or Parish Council anticipates for the village or when they will be occupied, but we do know the school cannot cope without this double mobile. Even then this will only accommodate 60 pupils, i.e. approximately 240 dwellings and there are more than this number in the current undetermined applications for planning permission. The District Council will need to consider whether a planning condition to restrict occupation until permanent primary education provision is available locally that is an acceptable solution to support further development once the temporary provision places are used up by additional development.

The proportionate temporary accommodation contribution is calculated as follows:

- Cost of a temporary accommodation £250,000
- Cost per place = £250,000/60 = £4,167
- Primary age pupils arising from this site is 33
- Proportionate contribution towards temporary classroom is 33 pupils x £4,167 per place = £137,511

The temporary classroom cost of £250k will fall to CIL.

Secondary Schools

The catchment secondary schools are Ixworth Free School and Thurston Community College. Thurston Community College has the largest secondary school catchment area in Suffolk. At present there is forecast to be sufficient surplus places available for pupils forecast to arise from the proposed development, with any expansion projects currently falling under CIL.

However, against the anticipated level of housing growth across the wider area a full assessment of secondary school requirements should be undertaken, but the initial view is that at the right time a new secondary school will be needed. The best

estimate of current cost is in the region of £25m, with a site of 10 hectares.

2. **Pre-school provision.** Refer to the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4-year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2-year olds. From these development proposals SCC would anticipate up to 14 pre-school pupils.

Through the Childcare Act 2016, the Government will be rolling out an additional 15 hours' free childcare to eligible households from September 2017.

At present, in the Thurston area, there are four settings that offer places (2 childminders, Thurston Preschool, and Tinkerbells Day Nursery). From a development of 138 dwellings, the County Council anticipates around 14 pre-school pupils eligible for funded early education. Currently there is sufficient capacity for only 10 pre-school pupils from this development. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 14 children of the total 60 who would be accommodated within the new setting, could be calculated as follows (revised costs from a similar scheme in Suffolk):

- £500,000 construction cost (including land as collocated with the new primary school) for a new 60 place setting
- £500,000/60 early years pupils = £8,333 per place
- From 137 dwellings there is the need for 14 additional places
- Therefore 14 pupils x £8,333 per place = **£116,662 (2017/18 costs)**

3. **Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
- b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.

- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

4. **Transport issues.** Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be coordinated by Suffolk County Council FAO Steve Merry.

Site specific matters will be covered by a planning obligation or planning conditions.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014.

5. **Libraries.** The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £29,592, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. Refer to the NPPF 'Section 8 Promoting healthy communities'.
6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

7. **Supported Housing.** In line with Sections 6 and 8 of the NPPF, homes should be designed to meet the health needs of a changing demographic. Following the replacement of the Lifetime Homes standard, designing homes to the new 'Category M4(2)' standard offers a useful way of fulfilling this objective, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the local planning authority's housing team to identify local housing needs.
8. **Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

On 18 December 2014 the Secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that, in considering planning applications:

"Local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate."

The changes set out in the MWS took effect from 06 April 2015.

A consultation response will be coordinated by Suffolk County Council FAO Jason Skilton.

9. **Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow SCC to make final consultations at the planning stage.

10. **Superfast broadband.** Refer to the NPPF paragraphs 42 – 43. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

11. **Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

12. The above information is time-limited for 6 months only from the date of this letter.

I would be grateful if the above information can be provided to the decision-taker in respect of this planning application.

Yours sincerely,



Neil McManus BSc (Hons) MRICS
Development Contributions Manager
Strategic Development – Resource Management

cc Carol Barber, Suffolk County Council
Steve Merry, Suffolk County Council
Floods Planning, Suffolk County Council

From: Consultations (NE)
Sent: 25 Aug 2017 09:24:14 +0100
To: BMSDC Planning Area Team Yellow
Subject: 4386/16 Consultation response FAO Dylan Jones
Attachments: ufm342.pdf, NE Feedback Form June 2015.pdf

Dear Mr Jones

Application ref: 4386/16

Our ref: 224058

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours sincerely

Jacqui Salt

Natural England

Consultation Service

Hornbeam House

Crewe Business Park

Electra Way,

Crewe

Cheshire, CW1 6GJ

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

From: Sandra Brown
Sent: 30 August 2017 12:30
To: BMSDC Planning Area Team Yellow
Subject: Re: Notification of Planning Application - 4386/16

For the attention of Dylan Jones - Application No: 4386/16 Land west side of Barton Road, Thurston

Pakenham Parish Council have the following comments on the above application:

Concerns with the application in respect of:

- Impact on sewerage works and its ability to cope with the increased volume due to large number of proposed housing
- Impact on highway infrastructure particularly on Thurston Road at the crossroads with Pakenham Road, Upper Town, Pakenham

Kind Regards
Sandra
Clerk to Pakenham Parish Council

From: planningyellow@baberghmidsuffolk.gov.uk <planningyellow@baberghmidsuffolk.gov.uk>
Sent: 16 August 2017 18:21
To: pakenhampc@outlook.com
Subject: Notification of Planning Application - 4386/16

Please find attached notification letter relating to planning application - 4386/16 - Land On The West Side Of Barton Road, Thurston IP31 3NT, ,

Kind Regards

Planning Support Team

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From:Nathan Pittam
Sent:30 Aug 2017 12:55:49 +0100
To:BMSDC Planning Mailbox
Subject:4386/16. EH - Land Contamination

EP Reference : 198623

4386/16. EH - Land Contamination.

Land on the west side of, Barton Road, Thurston, BURY ST EDMUNDS, Suffolk.

Erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space.

Many thanks for your request for comments in relation to the above application. I can confirm that I have no additional comments to those made on 22nd November 2016.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk

Work: 01449 724715

Mobile:: 07769 566988

Subject:FW: Planning Re-consultation Request - 4386/16

Attachments:ufm372.pdf

From: Louise Barker
Sent: 30 August 2017 10:56
To: Dylan Jones
Cc: Julie Havard
Subject: FW: Planning Re-consultation Request - 4386/16

Dear Dylan

Thank you for the re-consultation however I have no further comments to add to my previous response dated 19th Dec 16.

Kind regards

Louise

Louise Barker Cert CIH DipHE
Housing Enabling Officer
Strategic Planning
Mid Suffolk & Babergh District Councils Working Together

Direct dial: 01449 724787
Mobile: 07860829520
Email: louise.barker@baberghmidsuffolk.gov.uk
Websites: www.midsuffolk.gov.uk and www.babergh.gov.uk

-----Original Message-----

From: planningyellow@baberghmidsuffolk.gov.uk [<mailto:planningyellow@baberghmidsuffolk.gov.uk>]
Sent: 16 August 2017 19:12
To: Strategic Housing <Strategic.Housing@baberghmidsuffolk.gov.uk>
Subject: Planning Re-consultation Request - 4386/16

Please find attached planning re-consultation request letter relating to planning application - 4386/16 - Land On The West Side Of Barton Road, Thurston IP31 3NT, ,

Kind Regards

Planning Support Team

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From:Nathan Pittam
Sent:30 Aug 2017 14:28:53 +0100
To:BMSDC Planning Mailbox
Subject:4386/16. EH - Air Quality.

EP Reference : 198619

4386/16. EH - Air Quality.

Land on the west side of, Barton Road, Thurston, BURY ST EDMUNDS, Suffolk.

Erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space

Many thanks for your request for comments in relation to the above application. I have reviewed the application and can confirm that I have no objection to the proposed development from the perspective of air quality owing to the low background concentrations at the location of the development meaning that it would be highly unlikely for air quality to be compromised.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

Email: Nathan.pittam@baberghmidsuffolk.gov.uk

Work: 01449 724715

From:Chris Ward
Sent:1 Sep 2017 14:54:37 +0100
To:Dylan Jones
Cc:BMSDC Planning Area Team Yellow
Subject:RE: Planning Re-consultation Request - 4386/16

Dear Dylan,

Thank you for re-consulting me about the proposed development at the land on the West Side of Barton Road in Thurston. Having had the chance to review the documents submitted I have no further comment to make for the time being.

Kind regards

Chris Ward
Travel Plan Officer
Transport Strategy – Development Management
Strategic Development – Resource Management
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich, IP1 2BX
Telephone: 01473 264970
Mobile: 07860 832202
email : chris.ward@suffolk.gov.uk
web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

-----Original Message-----

From: planningyellow@baberghmidsuffolk.gov.uk [<mailto:planningyellow@baberghmidsuffolk.gov.uk>]
Sent: 16 August 2017 19:17
To: Chris Ward <Chris.Ward@suffolk.gov.uk>
Subject: Planning Re-consultation Request - 4386/16

Please find attached planning re-consultation request letter relating to planning application - 4386/16 - Land On The West Side Of Barton Road, Thurston IP31 3NT,,

Kind Regards

Planning Support Team

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THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

Tel: 01359 232854
e-mail: info@thurstonparishcouncil.gov.uk



SENT AS AN E-MAIL

Mr. P Isbell
Corporate Manager – Development Management
MSDC
131 High Street
Needham Market
IP6 8DL

30th August 2017

Dear Mr. Isbell,

Proposal: Planning Application 4386/16 – erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space at land on the west side of Barton Road, Thurston. IP31 3NT

The Parish Council wishes to place on record that it objects to the re-submitted plans as submitted under planning application 4386/16. Having viewed this application and compared it with that submitted under 02232/17, the Parish Council feels that the changes in the documents are again relatively small and mainly cosmetic and therefore the objections as submitted under 02232/17 and previously under 4386/16 are valid for this application as well.

For clarity: the Parish Council is raising concerns covering the following:

- location within the countryside and outside of built up area boundary
- location also unsympathetic to the area in which it is placed with a significant impact on the rural features of the village on approach
- overdevelopment of site given density being proposed
- siting of 2 storey dwellings along boundaries out-of-keeping with adjacent area
- design is more in keeping with that of an urban setting
- negative impact on the biodiversity of the area
- negative impact on the countryside
- mix of tenure proposed
- impact on education provision
- impact on current highway infrastructure
- impact on the sustainability of current public transport - concern that the original transport assessment has been re-submitted with some additions to it aimed at addressing mitigation impacts:
 - Substantial difference in levels of traffic being quoted – 30%

- Walking assessments do not equate to reality
- Not practical to assume that residents will walk to Cracknells Garage to access a cash-point
- Visibility displays still refer to the original planning application
- Issue over the current restriction through the village for 7.5 tonne lorries- issue for delivery of materials

The Parish Council again draws reference to the applicant's Planning Statement submitted – which claims refers to the applicant's consultative methods – and is concerned that some of the statements contained therein are misleading as the applicant only submitted concept plans to the Parish Council and were told that until a Planning Application was forthcoming the Parish Council and Neighbourhood Plan Team would not comment on a 'concept plan'. The site assessments for the Neighbourhood Plan were extensively consulted upon and indeed a number of those who had submitted their sites for assessment engaged within the site assessment work but this site chose not to submit within the timescales widely advertised. In June 2016, after the sites had been assessed and consulted upon, there was then an official request submitted for the site to be subject to a detailed assessment. The Parish Council also feels that the assertion that a true consultative programme had been carried out should be challenged as many residents complained that they only had a couple of days-notice that the applicant's agent was holding a public consultation on the plans to be submitted.

The Parish Council accepts that, until the Order for the Neighbourhood Plan is laid, it is expected to respond to current planning applications in line with policies set out in the Mid Suffolk Local Plan. As defined by Mid Suffolk's Local Plan, Thurston is a Key Service Centre and growth is assumed to be in line with current policy. Policies cor1 (cs1 settlement hierarchy) and cor2 (CS2 development in the countryside and countryside villages) have been considered in the Council's response to this application. It cannot be disputed that Thurston has a settlement boundary and as such the location of this site is outside of that boundary although it is acknowledged to be adjacent.

The Parish Council however has not only looked at current policy, but has also taken on board views of the members of the public who attended the Planning Committee Meetings held to discuss this application as well as the Public Meetings and the regular monthly meetings (40+) of the Neighbourhood Plan Team who are in the process of undertaking a Neighbourhood Plan for Thurston. The Neighbourhood Plan Team reports to the Parish Council on a regular basis and all Parish Councillors are fully aware and in agreement with the views of the Neighbourhood Plan Team, some of whom are indeed both Parish Councillors and Neighbourhood Plan members. It should also be noted that the Neighbourhood Plan Team has carried out its own Parish Housing Land Availability Assessment and has assessed 19 sites within the village for suitability for development, the results of which can be found at the following:

<http://thurston.suffolk.cloud/neighbourhood-plan/site-assessment-of-sites-for-development/>

Reasons for the Parish Council's continuing objection in detail:

1. The site and surrounding area are within the countryside and therefore outside of any settlement boundary for Thurston as defined by Mid Suffolk's Local Plan and would result in the development of new dwellings that would be visually, physically and

functionally isolated from the facilities and services offered by Thurston as a Key Service Centre.

It is also felt that the proposal is considered to be an overdevelopment of the site and fails to address the wishes of the views of the residents of Thurston (as expressed in the emerging Thurston Neighbourhood Plan) for all new development to be sited on areas containing no more than 50 dwellings and as such will not incorporate the creation of sufficient open spaces between existing and proposed buildings which will neither maintain nor enhance the character of the village at this particular point. (GP1 – Design and Layout of Development & csfr-fc2 provision and distribution of housing).

The Parish Council is of the view that the increased number of 2 storey dwellings along the western and southern development is not a feature of the area immediately adjacent to the site and that the appearance of such dwellings will be an intrusion and will fail to complement the character of the existing area. As there is a slightly higher proportion of 1 storey dwellings within these locations the proposal fails to consider the surrounding area and is to be considered to be contrary to Policy H13 in that it fails to follow a design and layout which should respect the character of the proposed site and the relationship of the proposed development to its surroundings. There is also a concern that there has been a reduction in the setback of the proposed properties from the existing dwellings and that by having houses built on the very edge of the boundaries, there will be a detrimental impact on the privacy, tranquillity and outlook of the existing properties which is not in accordance with Policies H13 of the Mid Suffolk Local Plan in that it fails to take into account the amenities of neighbouring residents which should not be unduly affected by reason of overlooking or loss of daylight.

The Parish Council continues to state that the preferred option would be to have single story dwellings around the perimeter of the site which would be in-keeping with the existing properties. Furthermore, there should be substantial soft landscaped buffer strips to maintain existing levels of privacy and tranquillity.

2. The proposal is considered not to form a sustainable development within the dimensions set out in the NPPF and that the proposed application risks harm to biodiversity and fails to address adequately the benefits on an economic and social benefit.

The Parish Council does not hold with the views expressed in the documents submitted that the application is sympathetic to the countryside in which it is situated and that it fails to protect the intrinsic character of the countryside by the density and mix of properties being proposed. It is felt that the development of 138 dwellings will intrude into an area of currently open, undeveloped, countryside resulting in an encroachment of built development extending beyond the settlement boundary of Thurston. This will harm the character and appearance of this open area and will be contrary to Policy CS5 of the Core Strategy, Policy FC1.1 of the Core Strategy of the Mid Suffolk Core Strategy Focus Review (2012) and saved Policies H13 and H16 of the Mid Suffolk Local Plan. Furthermore, it is felt that the development fails to ensure that it reflects the local character and identity of the area immediately surrounding the proposed development and is therefore inconsistent with paragraph 58 of the NPPF.

The Parish Council feels that the development is inappropriate in both size, density and style for an area on the very edge of Thurston. It further feels that the loss of open space which contributes to the character or appearance of the village at this point is of

such significance that the proposal will show that it materially reduces the amenity and privacy of adjacent dwellings and erodes the character of the surrounding area.

The Parish Council is also concerned that the density and mix of the housing being proposed fails to provide a mix of house types, sizes and affordability to cater for the many different accommodation needs and fails to reflect the requirements under NPPF para 50 which states that housing development should "deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities" and does not 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own Homes'.

3. The Parish Council considers that the application still fails to take into account the current road infrastructure and the lack of pedestrian route-ways and cycle ways leading from the site to the amenities and both Primary and Secondary Schools within the village and as such would have a negative impact on road safety and therefore a detrimental impact on the amenities enjoyed by the surrounding area vis-à-vis traffic generation (SB2 Development Appropriate to its Setting & T10 Highway Considerations in Development).

There is no provision of adequate pedestrian crossing points along Barton Road for those wishing to access both the Community College, Primary School and other village facilities. This is contrary to NPPF Paragraph 32 which in part states that "safe and suitable access to the site can be achieved for all people". The Parish Council is concerned that the application fails to show the provision of an adequate footway directly serving the development to the existing footway further along Barton Road. Given the increase in pedestrian use of the existing pathway further along Barton Road that this development will bring the Parish Council feels that improvements for the crossing of Barton Road are warranted.

It is furthermore held that as the development fails to demonstrate that it has considered safe and suitable access points for all people it is contrary to paragraph 32 of the NPPF. As the development fails to give priority to pedestrian and cycle movements and, with reference to the siting of this application, would not support the transition to a low carbon future, it is felt that it is unable to meet the environmental dimension of sustainable development and would be contrary to paragraph 17, 30, 35 and 55 of the NPPF and Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review.

The Parish Council feels that the development of the site will not be able to allow for the convenient integration of public transport within the site and that the traffic that will be generated will not be able to be accommodated on the existing road network (CS6 – services and infrastructure).

4. The Parish Council has concerns over the single access being proposed onto Barton Road. It feels that the risk of obstruction of a single access in times of emergencies makes the proposal unsustainable and fails to follow Planning Guidance which states that streets should be designed to support safe behaviours, efficient interchange between travel modes and the smooth and efficient flow of traffic. The transport user hierarchy should be applied within all aspects of street design – and should consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public

transport users, specialist vehicles like emergency vehicles and finally other motor vehicles. The Parish Council also questions the safety aspect of having a single entrance road to/from the development directly onto Barton Road with no pedestrian footpath.

5. The Parish Council feels that given the location of the site, a reliance on the private motor car will be generated in order to access amenities and services within both the village and further afield which will also be contrary to the sustainability objectives of Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012) and the NPPF paragraphs 14, 17, 55 and 56 and will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway bridge crossings on Barton Road and Thedwastre Road, entry and exit points onto the A14 and the junction of Thurston Road, Great Barton and A143.

The Parish Council would also like to question the reasoning behind the submission of such minor details to the original application for this site. It notes that at the Mid Suffolk Planning Referrals Committee Meeting of 12th July 2017, there was overwhelming support for a "minded to object" to application 4386/16 on the grounds that the application did not enhance or improve the area in which it was located and that the design and layout were inappropriate to development. Given that there is very little difference in the recently submitted amendments and that no attempt has been made to address the issues raised by either the Committee, the Parish Council, the Neighbourhood Plan Team or members of the public, the Parish Council strongly objects to this application.

Yours sincerely,

Victoria S Waples

V. S. Waples, BA(Hons), CiLCA
Clerk to the Council



From:Adkins, Connor
Sent:4 Sep 2017 10:18:34 +0100
To:BMSDC Planning Area Team Yellow
Cc:growthandplanning
Subject:planning application 4386/16
Importance:High

Dear Sir/Madam

Thank you for your consultation. The changes to the proposal are unlikely to affect its impact on the strategic road network. Our previous recommendation, issued on 13 December 2016 may therefore remain in place.

Yours Faithfully

Connor Adkins

Connor Adkins

Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW
Tel: +44 (0) 300 4704744
Web: <http://www.highways.gov.uk>
GTN: 0300 470 4744

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Consultation Response Pro forma

1	Application Number	4386/16 as amended Barton Road, Thurston	
2	Date of Response	11.9.17	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> no harm to a designated heritage asset because it will not erode the rural character of nearby listed buildings. 	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	The amendments to the proposal do not result in any change to the proposal's impact on heritage assets. There is accordingly no reason to vary from my colleague's appraisal.	
6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		
7	Recommended conditions		

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

Our Ref: 570/CON/Thurston
Date: 13th September 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

The Planning Officer
Mid Suffolk District Council
Council Offices
131 High Street
Ipswich
Suffolk
IP6 8DL

For the Attention of: Dylan Jones

Dear Dylan

Thurston Cumulative Development: Network Rail Proposals

LOCATION: Thurston, Suffolk

As part of the ongoing study of the cumulative impact of the proposed developments in Thurston Suffolk County Council (SCC), as a statutory consultee for Highways, wishes to record the following comments on the consultation response and supporting feasibility study relating to the crossing at Thurston Station provided by Network Rail.

SCC strongly supports improvements to the safe provision of sustainable and public transport and recognises Network Rail's concerns about the safety of the pedestrian rail crossing. However, there are several issues that affect the public highway which would require resolution to produce a scheme acceptable to SCC. We would encourage further dialog with Network Rail to resolve these issues.

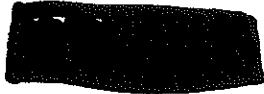
The highway issues identified are:

- Widening the footway under the bridge as proposed will push vehicles using Barton Road to the west. As the bridge is an arched structure this may reduce the available headroom and the increase risk of bridge strikes. If this necessitates a lowering of the existing height this will affect the of the highway by large vehicles, possibly diverting them onto other less suitable routes. It is acknowledged that reducing the road to a single lane would have the advantage or removing the risk of high sided vehicles trying to pass each other under the bridge which it is understood already results in bridge strikes.
- Signalisation of the junctions adjacent to the rail bridge is likely to reduce road capacity increasing congestion. We would look for Network Rail to undertake a Transport Assessment to measure this. The scope of the Transport Assessment will need to be agreed with SCC in advance. Preliminary studies by SCC are that the junctions within the mitigation area have the capacity to accommodate the proposed developments but that this is based on the existing unimpeded network.
- The design indicates visibility to signal heads one step down from DMRB. A Road Safety Audit will be required to ensure that the proposed layout is safe.
- The modifications to the highway require third party land not under control of Network Rail or SCC. Clarity of how this land is to be brought into the control of Network Rail or SCC is vital to show that these proposals are deliverable.

- The pick-up area is close to the junction and SCC has concerns that these may cause safety issues such as conflicts between vehicles leaving this area and through traffic
- Details of the footway will need to be provided to conclude a S278 agreement. SCC would expect street lighting to be provided for the new footway.

It is noted by SCC that alternative methods have been used to mitigate pedestrian safety concerns elsewhere in Suffolk, for example the gated crossing at Halesworth Station. We would encourage similar innovative solutions for Thurston.

Yours sincerely,

A black rectangular redaction box covering the signature of Steve Merry.

Steve Merry
Transport Policy and Development Manger
Resource Management

Our Ref: 5070/16, 4942/16, 2797/16, 5010/16, 4386/16 & 4963/16

Date: 12th October 2017

Enquiries to: Steve Merry

Tel: 01473 341497

Email: steven.merry@suffolk.gov.uk

The Planning Officer
Mid Suffolk District Council
Council Offices
131 High Street
Ipswich
Suffolk
IP6 8DL

For the Attention of: Ben Elvin

Dear Ben

Cumulative Development in Thurston

This letter updates Suffolk County Council's position as the Highways Authority on the five planning applications that were presented to the Mid Suffolk District Council Planning Committee on the 12th July 2017.

Of the five applications four were granted minded to approve and one minded to not approve decisions by the Planning Committee. The main reason for the minded to decisions was the committee's requirement for further transport studies to be undertaken to demonstrate that the cumulative development did not create a severe impact on the highway network.

Suffolk County Council, as Highways Authority commissioned AECOM to undertake further studies. The additional study formed two parts

- Investigation of the proposed mitigation at the A143 Bury Road / Thurston Road 'Bundbury Arms' junction to determine if the proposed scheme is deliverable and can deliver the necessary additional capacity
- To add further detail to the study of individual junctions and roads within the village of Thurston.

The collaborative partnership between the Applicants, Mid Suffolk District Council and Suffolk County Council that was developed during the planning process was continued with all parties contributing to the cost of this independent study.

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

The main issue at this junction indicated by early studies was the lack of capacity. Queueing occurs on Thurston Road approaching the A143 in the morning and on the A143 in the evening due to vehicles from Bury St Edmunds turning into Thurston Road. The proposed mitigation is to introduce right hand turn lanes with traffic signals to control the junction.

Drawing ref 60445024-SKCC_004-A (Fig 1 below) shows the indicative layout. A reduction in vehicle speeds is required due to the narrow lanes which in turn are restricted by the available highway land. During the detailed design, every effort will be made to increase the width of the lanes although the requirement for the reduced speed limit will remain

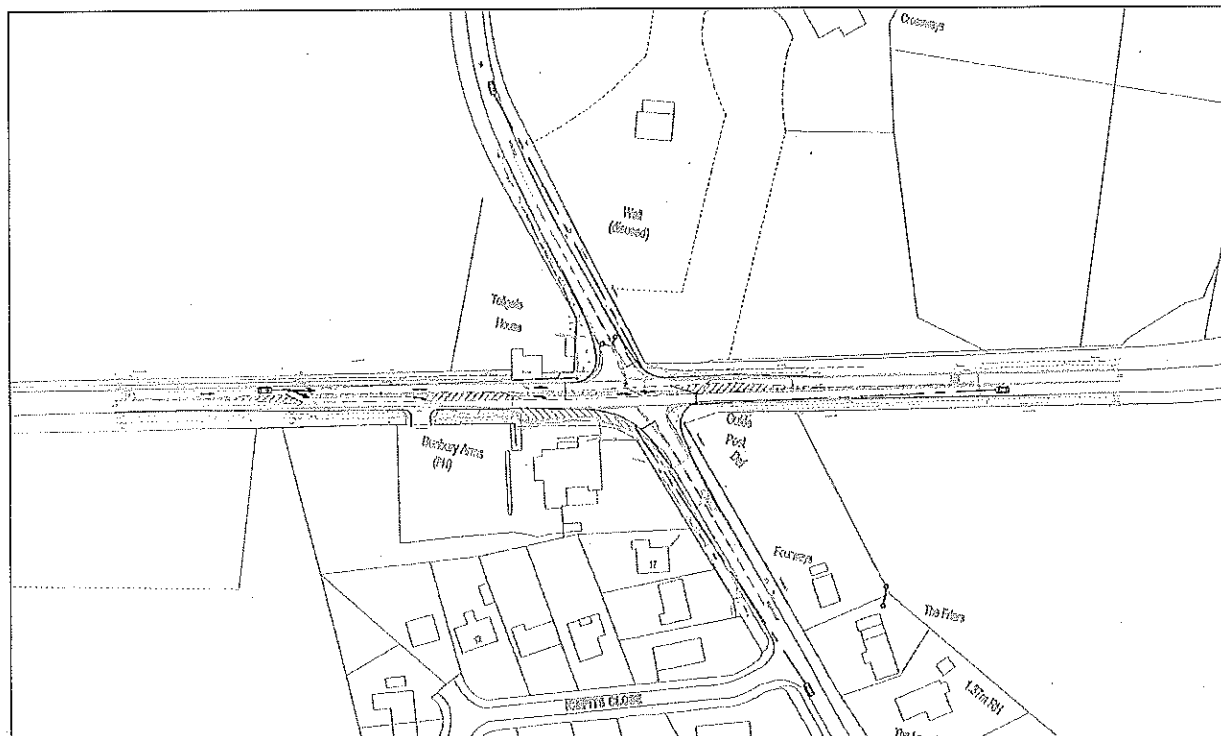


Fig 1: AECOM Drawing ref: 60445024-SKCC_004-A

				Base + growth (2021)		Base + growth + 827 dev (2021)		Base + growth + 629 dev (2021)	
Dwellings considered (year)				0		827		689	
Ref	Junction			AM	PM	AM	PM	AM	PM
1	A143 Bury Road / C691 Thurston Road/ C649 Brand Road	4 way priority				148	120		
1a	A143 Bury Road / C691 Thurston Road/ C649 Brand Road	4 way signalised junction (DoS)		92%	80%	97%	85%	98%	87%

Fig 2: A143/ Thurston Road Junction capacity

Without any highway improvements and with the proposed development the junction will be operating at considerable over capacity. Junction modelling indicates that the proposed traffic signal option will increase capacity although with the proposed development the junction will be close to the theoretical capacity in 2021.

As part of the study a Road Safety Audit was undertaken. Although this has raised a number of design issues it is considered that these can be addressed during the design process.

Transport study of roads in Thurston

The AECOM technical note 60445024 'Thurston Cumulative Impact Assessment Part 2' summarises the traffic impact of the development in terms of

- 2017 base
- 2021 baseline traffic (ie growth but no development)
- 2021 baseline traffic (including growth) plus 689 dwellings (four minded to developments)
- 2021 baseline traffic (including growth) plus 827 dwellings (all five developments)

Table 10 in the report summarised the junction data and this is replicated as Fig 3.

- Red: Over capacity (above 1 RFC)
- Orange: Operating close to capacity (above 0.85 RFC)
- Green: Operating under capacity (below 0.85 RFC)

Table 10: Summary of Junction Capacity Assessments 2021 scenarios

Junction	AM Peak Max RFC				PM Peak Max RFC			
	2017 Base	2021 Base	2021 with Dev (689)	2021 with Dev (827)	2017 Base	2021 Base	2021 with Dev (689)	2021 with Dev (827)
C691 Barton Road / C562 Station Hill Three Arm Mini Roundabout	0.46	0.47	0.65	0.69	0.68	0.60	0.72	0.78
C560 Beyton Road / C692 Thurston Road / U4920 Thedwastre Road Crossroads (Pokeridge Corner)	0.52	0.54	0.84	0.86	0.45	0.46	0.56	0.58
C693 Thurston Road / C692 Thurston Road Crossroads Fishwick Corner	0.88	0.91	1.05	1.21	0.45	0.46	0.67	0.60
C559 Norton Road / C562 Ixworth Road / C562 Station Hill staggered Crossroads	0.32	0.33	0.55	0.55	0.21	0.21	0.35	0.35
C691 Barton Road / C559 Norton Road 'T' Junction	0.35	0.36	0.48	0.50	0.16	0.17	0.22	0.22

Fig 3: Summary of Junction Capacities

The C560 Beyton Road / C692 Thurston Road / U4920 Thedwastre Road (Pokeridge Corner) junction with full development is close to capacity in 2021. This results in a maximum queue length of 5 vehicles in the am peak. This is not considered to be severe impact.

The C692 / C693 Thurston Road (Fishwick Corner) junction is operating close to capacity in 2017 and 2021 without any development. With either studied scale of development the junction will be operating significantly over capacity in the morning peak with queues of 40 (689 dwellings) and 54 (829 dwellings) vehicles. This degree of congestion caused concern to the Highways Authority and further work was undertaken to identify any potential mitigation to reduce this (see below).

The C691 Barton Road under the railway bridge is operating above capacity in the am peak. No mitigation has been identified that may alleviate this. There is a degree of uncertainty in the calculation of theoretical capacity as future growth may vary from current assumptions. For example, robust travel plans may encourage modal shift away from car use thus reducing demand. The link is very short (@50m) and the duration of any congestion is likely to be short lived being restricted to the morning peak. Under these circumstances it is considered that the localised congestion is not considered to represent a severe impact by the Highways Authority.

C692 / C693 Fishwick Corner: Mitigation Measures

As this junction was shown by the initial study to be operating over-capacity the Applicants were challenged to suggest possible mitigation measures. Following these discussions, a proposed scheme to change the priorities at the junction was selected for further study. This change provides two benefits

- An increase in capacity by prioritising those arms of the junction with the heaviest traffic
- By reducing speeds and providing stop lines rather than give way road safety can be improved.

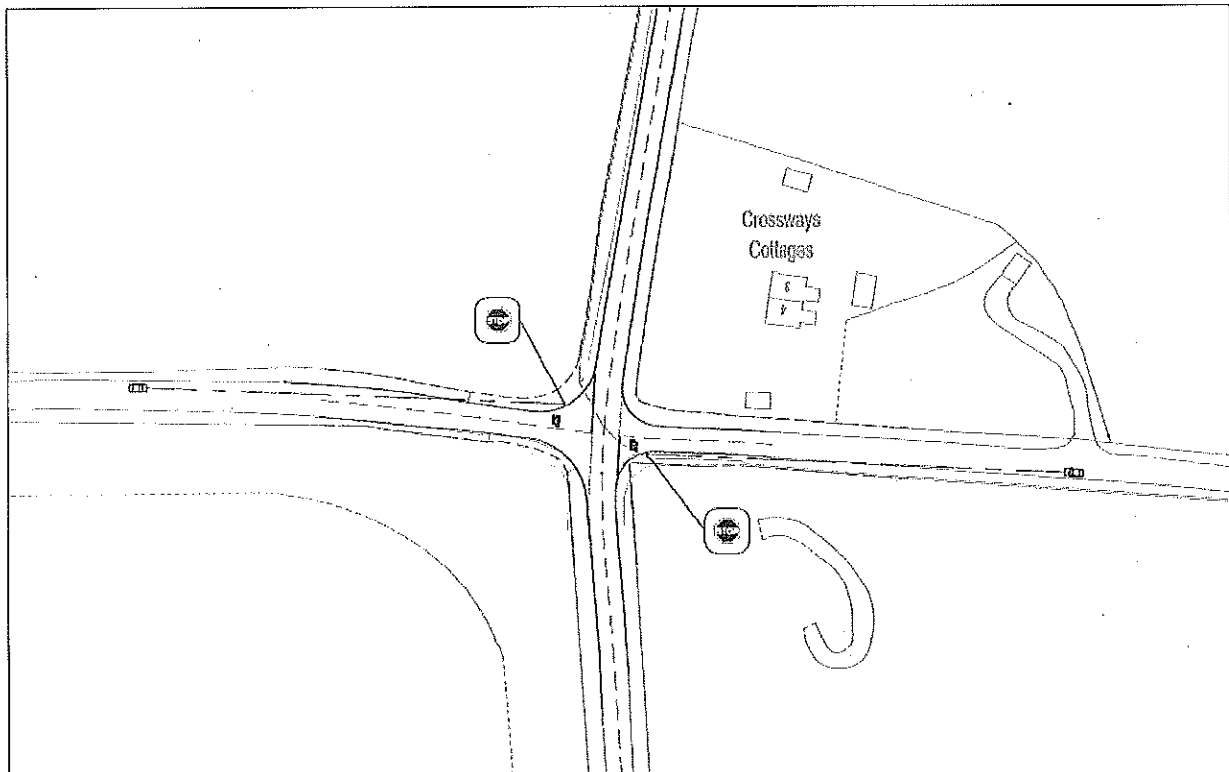


Fig 4: Proposed modified junction layout AECOM drawing 60445024-SKE-C-008-A

To confirm that these assumptions are correct indicative drawings have been prepared to make sure large vehicles can use the revised junction. In addition, modelling has been undertaken to confirm that the capacity can be improved and a road safety audit to identify any safety concerns. The modelling shown in Fig 4 shows that the capacity can be increased

			Base (2017)		Base + growth (2021)		Base + growth + 827 dev (2021)		Base + growth + 629 dev (2021)	
			0		0		827		689	
Dwellings considered (year)			AM	PM	AM	PM	AM	PM	AM	PM
5	C693 Thurston Road / C692 Thurston Road	4 way priority. (Fishwick Corner)	0.88	0.45	0.91	0.45	0.71	0.60	0.71	0.57
5a	C693 Thurston Road / C692 Thurston Road	Revised 4 way priority. (Fishwick Corner)	0.67	0.83	0.69	0.83	0.80	0.92	0.82	0.93

Fig 5: Modelling data for Fishwick Corner

The road safety audit identified vegetation and vehicle speeds as two potential issues. The designers' response considers that both can be addressed during the detailed design process.

Future Development

The studies show that the proposed five developments can be accommodated by the existing highway network with appropriate mitigation. While capacity is one factor considered when assessing if the impacts of development are severe as required in the National Planning Policy Framework it is not the only factor. Road safety and sustainability are also considered.

Any future development in Thurston must, in the Highway Authorities opinion, address the following constraints;

- No further capacity can be provided at the A143 Bury Road / Thurston junction within the existing highway boundary for traffic traveling to / from the Thurston area.
- The C692 / C693 Thurston Road (Fishwick Corner) cannot be improved further in terms of either road safety or capacity due to the highway boundary constraints.
- Any significant future development is likely result in the C560 Beyton Road / C692 Thurston Road / U4920 Thedwastre Road (Pokeridge Corner) junction reaching its theoretical capacity. This work has not investigated the potential for mitigation but the site has similar highway boundary constraints as the other junctions.
- The C291 Barton Road under the rail bridge is at capacity and without mitigation this may restrict future development in the area. Monitoring of traffic generated by the proposed developments will be important in assessing the actual compared to theoretical impact of the additional traffic.

As Highways Authority Suffolk County Council recommends that future Local Plans recognise these constraints and that the planning process is used to seek opportunities to remove these.

Yours sincerely



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