

# THURSTON PARISH COUNCIL

Parish Council Office  
New Green Centre  
Thurston  
Suffolk  
IP31 3TG

Tel: 01359 232854  
e-mail: [info@thurstonparishcouncil.gov.uk](mailto:info@thurstonparishcouncil.gov.uk)



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SENT AS AN E-MAIL

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

8<sup>th</sup> September 2017

Dear Mr. Isbell,

DC/17/02232

**Proposal: Re-consultation on Planning Application 02232/17 – erection of 129 dwellings (including 45 affordable 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 (second application) at land on the west side of Barton Road, Thurston. IP31 3NT**

The Parish Council wishes to place on record that it continues to object to the plans as submitted under planning application 17/02232. Having viewed this application and compared it with that previously submitted under this number, the Parish Council acknowledges that there is an overall reduction of number of dwellings on the site and that the number of bungalows has increase from 9 to 30. It does however maintain that the overall density is too high with an inappropriate house type mix for a development that is outside of the village settlement boundary and abuts open countryside. As such the Parish Council feels that the changes in the documents are relatively small and mainly cosmetic and therefore the objections as submitted under letter dated 7<sup>th</sup> August 2017 are valid for this re-consultation as well.

For clarity: The Parish Council would draw your attention to the full letter as submitted on 7<sup>th</sup> August 2017 and would ask that the following concerns are considered in its continued objection to this site:

- location within the countryside and outside of built up area boundary
- location unsympathetic to the area in which it is placed with a significant impact on the rural features of the village on approach
- Unacceptable design – new base plan includes new road layout but no information about the road structures as per previous submission. It is noted that the collection points for refuse have been removed which, given the size of the internal road, could create problems

- NP – contrary – reiterate views of residents – housing of 50 units is appropriate – if you are going to multiply if up need areas broken up by significant landscaping
- Urban design – issue over the 2 storey flats that still have large apex
- Urban type buildings – rectangular, square design – neither compliment nor enhance the areas surrounding the development
- No built leisure facilities, merely a small open space, which is of no benefit to the overall community
- Landscaping is regarded as minimal and there is a lack of detail on the landscaping that will take place around the edge of the site against current development
- No comment re cycle provision links or footpath
- No indication that the tenure of homes has considered aging population or homes being built for all
- Increased number of apartments from 6 to 10 under affordable provision
- There is a question as to why single bed apartments are regarded as being appropriate for a village setting as it is felt that this is more suited to an urban setting. Very standardised design not in-keeping with the surrounding area.
- Design maximises profit rather than offers benefits to the village.
- Overdevelopment of site given density being proposed
- Negative impact on the biodiversity of the area
- Negative impact on the countryside
- 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
- Planning Statement – point 3.5 – the Parish Council challenge the assertion that the village has a high level of employment opportunities / sites

Yours sincerely,

*Victoria S Waples*

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



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SENT AS AN E-MAIL

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

7<sup>th</sup> August 2017

Dear Mr. Isbell,

**Proposal: Planning Application 02232/17 – erection of 138 dwellings (including 48 affordable 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 (second application) at land on the west side of Barton Road, Thurston.**

The Parish Council wishes to place on record that it objects to the plans as submitted under planning application 17/02232. Having viewed this application and compared it with that submitted under 4386/16, the Parish Council feels that the changes in the documents are relatively small and mainly cosmetic and therefore the objections as submitted 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
- 3 storey apartment buildings in centre - inappropriate for a housing estate situated on the edge of a rural village
- 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
- Planning Statement – point 3.5 – the Parish Council challenge the assertion that the village has a high level of employment opportunities / sites

It should also be noted that comments made under the Planning Statement submitted – points 2.10-2.12 - 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, Pokeriage 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 Transport Assessment report submitted as part of the planning application states that

“As highlighted in Paragraphs 2.11 and 2.12, although superseded by the NPPF, PPG 13 recommended the substitution of short car trips for walking (where the journey is under 2 km) and cycling (where the journey is under 5 km). These shorter trips should, where possible, be integrated with the use of public transport modes for longer journeys”.

Whilst there are bus stops along Barton Road to Bury St Edmunds and Stowmarket making this a possible alternative to using private motor cars, the Parish Council is concerned that given the location of the site there will be such a reliance on the private motor car to access local amenities and services that significant pressure will be placed on known existing pinch points such as the junctions of Norton Road and Ixworth Road. Barton Road is also considered to be a highly used road and is likely to deter cyclists.

The Transport Assessment has also indicated that a Travel Plan is required, which the Parish Council believes should have been submitted at the time of the planning application in accordance with NPPF para 36 which states that ‘A key tool to facilitate the objectives of para 35 will be a travel plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan’. The Parish Council would welcome the opportunity to comment further on details but would request that such a plan is submitted showing how the uptake of sustainable travel is to be implemented and how the developers will promote the use of public transport, car sharing and/or use of the cycle given the comments above.

The Parish Council would also like to question the reasoning behind the submission of a second application for this site. It notes that at the Mid Suffolk Planning Referrals Committee Meeting of 12<sup>th</sup> 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 between that application and this one and 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





**Sent:** 12 September 2017 14:05  
**To:** BMSDC Planning Area Team Blue  
**Subject:** Response to planning application

Gt Barton Parish Council would like to make the following comments on this application :

**Reference : DC/17/02232 - Erection of 129 dwellings, construction of new vehicular access and provision of cycle/pedestrian link to Barton Road etc**

Thurston Community College is the secondary school serving Great Barton. As such, schemes that influence the capacity of that school have a direct impact on the residents of Great Barton. This school is operating at capacity and SCC's latest Directory of Schools in Suffolk confirms that the school had more applications than places available last year. This is a school that has recently expanded to take on extra students during the previous education reorganisation. GBPC is concerned that school does not have sufficient capacity to support significant new residential development within its catchment area with a direct and negative consequence for the residents of Great Barton.

5. The boundary of the application site is adjacent to the parish boundary with Great Barton. That boundary is currently the rural edge of both Thurston and Great Barton. The character of this edge will be eroded by the proposed development with a negative impact on the rural character in this area. The proximity of housing to this edge provides insufficient space for meaningful landscape and variation in plot depth to mitigate this impact.

GBPC believes that the scheme in its current form is unacceptable and should not be approved. For the reasons given above GBPC considers that the proposal is contrary to the NPPF and that the benefits of the scheme are significantly and demonstrably outweighed by the impacts identified. The proposal is not considered to represent sustainable development and therefore does not benefit from a presumption in favour of permission.

GBPC is also concerned that this proposal is undermining the Neighbourhood Plan-making process that Thurston Parish Council is currently undertaking. It is important that the Council gives this matter careful consideration and adequately addresses this point in its decision-making.

*Linda*

Mrs Linda Harley (CILCA)  
Parish Council Clerk and Responsible Financial Officer

Our Ref: 570/CON/Thurston  
Date: 13<sup>th</sup> September 2017  
Enquiries to: Steve Merry  
Tel: 01473 341497  
Email: [steven.merry@suffolk.gov.uk](mailto: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 of 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**



## **Planning Applications – Suggested Informative Statements and Conditions Report**

AW Reference: 00023474

Local Planning Authority: Mid Suffolk District

Site: Land on the west side of Barton Road,  
Thurston

Proposal: Erection of 129 dwellings (including 45  
affordable dwellings), construction of new  
vehicular access and provision of cycle  
/pedestrian link to Barton Road. Provision of  
road and drainage infrastructure and open  
space (second application)

Planning Application: DC/17/02232

**Prepared by:** Pre-Development Team

**Date:** 13 September 2017

If you would like to discuss any of the points in this document please  
contact me on 0345 0265 458 or email  
[planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)

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## **ASSETS**

### **Section 1 – Assets Affected**

- 1.1 There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

*"Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence."*

## **WASTEWATER SERVICES**

### **Section 2 – Wastewater Treatment**

- 2.1 The foul drainage from this development is in the catchment of Thurston Water Recycling Centre that will have available capacity for these flows.

### **Section 3 – Foul Sewerage Network**

- 3.1 Development will lead to an unacceptable risk of flooding downstream. The drainage strategy prepared in consultation with Anglian Water suggested a connection should be made via a gravity regime. However the Flood Risk Assessment submitted with this application states that a pumped regime will be required to drain some flows. We would wish to see a proposed pumped rate and rising main layout in order to determine whether a pumped connection could be accommodated in the receiving network without causing an unacceptable risk of flooding downstream.

We request a condition requiring the drainage strategy covering the issue(s) to be agreed.

### **Section 4 – Surface Water Disposal**

- 4.1 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.
-

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

## **Section 5 – Trade Effluent**

5.1 Not applicable

## **Section 6 – Suggested Planning Conditions**

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

### **Foul Sewerage Network (Section 3)**

#### **CONDITION**

*No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.*

#### **REASON**

*To prevent environmental and amenity problems arising from flooding.*

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**From:**Infrastructure Team (Babergh Mid Suffolk)  
**Sent:**24 Jul 2017 14:03:23 +0100  
**To:**BMSDC Planning Area Team Blue  
**Subject:**RE: Planning Re-consultation Request - DC/17/02232

Dear Dylan,

The application site lies within the Mid Suffolk CIL High Value Zone and would therefore attract CIL at a rate of £115m<sup>2</sup> (which is subject to indexation). Pooling restrictions would apply where s106 obligations are sought for infrastructure projects not included on the Regulation List and therefore any infrastructure projects needs to be clearly defined to ensure compliance with CIL Regulations 122 and 123.

Kind Regards,

Nicola

**Infrastructure Team**

Babergh and Mid Suffolk District Council – Working Together

Tel: 01449 724563

**From:** Infrastructure Team (Babergh Mid Suffolk)  
**Sent:** 24 August 2017 13:20  
**To:** BMSDC Planning Area Team Blue; Dylan Jones  
**Subject:** RE: Planning Re-consultation Request - DC/17/02232

Dear Mr Jones,

The development site, Land On the West Side of Barton Road Thurston, lies within the high value zone for MSDC Charging Schedule and therefore would attract Community Infrastructure Levy (CIL) at a rate of £115m<sup>2</sup> (subject to indexation). CIL is calculated once planning permission is granted as the approved plans provide the data for the GIA element of the CIL calculation. CIL is due in instalments upon commencement, provided a completed CIL Form 1 has been submitted. The developer should ensure they understand their duties under the CIL Regulations 2010 (as amended).

Kind Regards,

Nicola

**Nicola Parrish**  
Infrastructure Officer

Tel: 01449 724977 (DD) / 4977(Ext)  
Mob: 07720899821



From: Infrastructure Team (Babergh Mid Suffolk)  
Sent: 06 July 2017 11:29  
To: BMSDC Planning Area Team Blue  
Subject: RE: Planning Consultation Request - DC/17/02232

Hello,

This development is in the Community Infrastructure Levy (CIL) High value zone and would attract CIL at a rate of £115m<sup>2</sup> (subject to indexation). The Developer should ensure they understand their duties in relation to compliance with the CIL Regulations 2010 (as amended).

The Infrastructure Team requests that they are consulted on any proposed s106 Heads of Terms.

Kind regards,

Angharad Firth  
Infrastructure Support Officer  
Infrastructure Team  
Babergh and Mid Suffolk District Council – Working Together

Mob: 07710854584  
Tel: 01449 724978

HSE

**Sent:** 06 July 2017 13:34  
**To:** BMSDC Planning Area Team Blue  
**Cc:** Dylan Jones  
**Subject:** Re: FW: Planning Consultation Request - DC/17/02232 FAO Mr Dylan Jones

Dear Mr Jones,

HSE is a statutory consultee on relevant developments within the consultation distance of a hazardous installation or a major accident hazard pipeline. Planning Authorities should use the HSE's Planning Advice Web App to consult HSE on such applications and produce a letter confirming HSE's advice. This service replaces PADHI+ HSE's on-line software decision support tool.

The Web App can be found here;

<http://www.hsl.gov.uk/planningadvice>

All planning authorities were contacted prior to the launch of the Web App with log in details to set up an administrator. This administrator will be able to set up other users within the organisation. The local group administrator for Babergh is Ms Julie Havard.

Planning Authorities should use the Web App to consult HSE on certain developments including any which meet the following criteria, and which lie within the consultation distance (CD) of a major hazard site or major hazard pipeline.

- residential accommodation;
- more than 250m<sup>2</sup> of retail floor space;
- more than 500m<sup>2</sup> of office floor space;
- more than 750m<sup>2</sup> of floor space to be used for an industrial process;
- or which is otherwise likely to result in a material increase in the number of persons working within or visiting the notified area.

There is also further information on HSE's land use planning here: [www.HSE.gov.uk/landuseplanning/](http://www.HSE.gov.uk/landuseplanning/)

Regards,

Peter Rastall  
Land Use Planning Support Team  
HSL, Harpur Hill,  
Buxton,  
SK17 9JN  
01298 218159

From: Iain Farquharson  
Sent: 25 August 2017 10:55  
To: BMSDC Planning Area Team Blue  
Subject: M3 196123: Planning Re-consultation Request - DC/17/02232

Dear Sir/Madam

The amendments proposed do not affect our original comments Regards

Iain Farquharson

Senior Environmental Management Officer  
Babergh Mid Suffolk Council

BB01449 724878 / 07860 827027  
[//iain.farquharson@baberghmidsuffolk.gov.uk](mailto://iain.farquharson@baberghmidsuffolk.gov.uk)

**From:** Iain Farquharson  
**Sent:** 26 Jul 2017 09:54:13 +0100  
**To:** BMSDC Planning Area Team Blue  
**Subject:** M3:196123 Planning Re-consultation Request - DC/17/02232

Dear Sir/Madam

The amended plans received on the 18th July do not affect our original comments about the unsuitable sustainability report and the inconsistencies and ambiguity within it as advised to you on the 11/7/17.

Our position remains the same ie recommend refusal until such time that a satisfactory report is made available and approved by this department.

Regards

Iain Farquharson

Senior Environmental Management Officer  
Babergh Mid Suffolk Council

BB01449 724878 / 07860 827027  
//iain.farquharson@baberghmidsuffolk.gov.uk

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

**From:** planningblue@baberghmidsuffolk.gov.uk [<mailto:planningblue@baberghmidsuffolk.gov.uk>]  
**Sent:** 24 July 2017 13:32  
**To:** Environmental Health  
**Subject:** Planning Re-consultation Request - DC/17/02232

Please find attached planning re-consultation request letter relating to planning application - DC/17/02232 - Land On The West Side Of, Barton Road, Thurston, Suffolk

Kind Regards

Planning Support Team

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From: Iain Farquharson  
Sent: 11 July 2017 12:40  
To: josh.collett@bovishomes.co.uk  
Cc: BMSDC Planning Area Team Blue  
Subject: M3 196123: Planning Consultation Request - DC/17/02232 Barton Road Thurston

EH Sustainability

Dear Josh

You have demonstrated willingness to reduce the environmental impact of the development via the sustainability and energy statement however the report fluctuates between energy and carbon reduction.

These items are of course linked but at the outset of the report a 10% energy reduction is noted which I believe has not been demonstrated, the case study offered as an example illustrates carbon reduction not energy.

Further the inclusion of PV panels is unclear, phrases such as may and might are used causing confusion.

Could you please review your document and re-submit it to demonstrate that the fabric improvements provide either all or some of the energy reduction and then the likely level of PV that will also be included to get to 10% overall reduction.

Thank you

Iain Farquharson

Senior Environmental Management Officer  
Babergh Mid Suffolk Council

BB01449 724878 / 07860 827027  
//iain.farquharson@baberghmidsuffolk.gov.uk

Your ref: DC/17/02232  
Our ref: Thurston – land on the west side of  
Barton Road 00051279  
Date: 25 July 2017  
Enquiries to: Neil McManus  
Tel: 01473 264121 or 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

Mr Dylan Jones,  
Planning Services,  
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 – developer contributions**

I refer to the planning application for the erection of 138 dwellings with construction of a new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping, and open space. This is subject to re-consultation due to amended plans received on 18 July. I previously sent a full consultation response by way of letter dated 11 July 2017, which is still applicable. I have no further comments to make in respect of the amended plans.

Yours sincerely,



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

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

Your ref: DC/17/02232  
Our ref: Thurston – land on the west side of  
Barton Road 00051279  
Date: 23 August 2017  
Enquiries to: Neil McManus  
Tel: 01473 264121 or 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto: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 DC/17/02232 – developer contributions**

I refer to the planning application for the erection of 129 dwellings (including 45 affordable dwellings), construction of new vehicular access and provision of cycle /pedestrian link to Barton Road. Provision of road and drainage infrastructure and open space (second application).

Reason(s) for re-consultation: Please see letter, revised landscape report, and revised plans received 18.8.17 and change of description detailing reduction in dwellings from 138 to 129.

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 129 dwellings from this proposed development, amount to a total of 839 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*:	30	30	16,429
High school age range, 11-16:	20	0	18,355
Sixth school age range, 16+:	4	0	19,907

Total education contributions:	<b>£492,870.00</b>
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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 30 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
- £6.9m/420places = £16,429 per pupil place
- From 129 dwellings it is forecast that 30 primary age pupils will arise

- Therefore 30 pupil's x £16,429 per place = **£492,870 (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 30 places x £1,294 per place = **£38,820.**

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 26<sup>th</sup> 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 =  $\text{£}250,000 / 60 = \text{£}4,167$
- Primary age pupils arising from this site is 30
- Proportionate contribution towards temporary classroom is 30 pupil's x  $\text{£}4,167$  per place =  $\text{£}125,010$

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 13 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 129 dwellings, the County Council anticipates around 13 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 630m<sup>2</sup> (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 13 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 129 dwellings there is the need for 13 additional places
- Therefore 13 pupils x £8,333 per place = **£108,329 (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. £27,864, 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



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Our ref: Thurston – land on the west side of  
Barton Road 00051279  
Date: 11 July 2017  
Enquiries to: Neil McManus  
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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 138 dwellings from this proposed development, amount to a total of 827 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.

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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'.

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- 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 29 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 138 dwellings it is forecast that 29 primary age pupils will arise
- Therefore  $29 \text{ pupil's} \times \text{£16,429 per place} = \text{£476,441 (2017/18 costs)}$

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  $29 \text{ places} \times \text{£1,294 per place} =$

**£37,526.**

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 26<sup>th</sup> 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 =  $\text{£}250,000 / 60 = \text{£}4,167$
- Primary age pupils arising from this site is 29
- Proportionate contribution towards temporary classroom is 29 pupil's x  $\text{£}4,167$  per place =  $\text{£}120,843$

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 2 pre-school pupils, at a cost of £6,091 per place (2016/17 costs).

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 630m<sup>2</sup> (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 138 dwellings there is the need for 14 additional places
- Therefore 14 pupils x £8,333 per place = **£116,662 (2016/17 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. £29,808, 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

Natural  
England

**From:** Consultations (NE) [mailto:consultations@naturalengland.org.uk]  
**Sent:** 13 July 2017 16:30  
**To:** BMSDC Planning Area Team Blue  
**Subject:** DC/17/02232 consultation response

Dear Sir/Madam

Application ref: 220453  
Our ref: DC/17/02232

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.

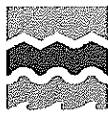
We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>

Yours faithfully

Dan Henshall  
Consultations  
Natural England  
Hornbeam House, Electra Way  
Crewe Business Park  
Crewe, Cheshire CW1 6GJ

Tel: 0300 060 3900  
email [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)

[www.gov.uk/natural-england](http://www.gov.uk/natural-england)



Historic England

EAST OF ENGLAND OFFICE

Mr Dylan Jones  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Suffolk  
IP6 8DL

Direct Dial: 01223 582740

Our ref: P00615141

22 August 2017

Dear Mr Jones

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

**LAND ON THE WEST SIDE OF, BARTON ROAD, THURSTON , SUFFOLK  
Application No. DC/17/02232**

Thank you for your letter of 18th 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

**Sophie Cattier**  
Business Officer  
E-mail: [sophie.cattier@HistoricEngland.org.uk](mailto:sophie.cattier@HistoricEngland.org.uk)

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

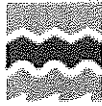


24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
[HistoricEngland.org.uk](http://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

Mr Dylan Jones  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Suffolk  
IP6 8DL

Direct Dial: 01223 582740

Our ref: P00615141

25 July 2017

Dear Mr Jones

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

**LAND ON THE WEST SIDE OF, BARTON ROAD, THURSTON, SUFFOLK  
Application No. DC/17/02232**

Thank you for your letter of 24 July 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



**Sophie Cattier**

Assistant Inspector of Buildings and Areas  
E-mail: [sophie.cattier@HistoricEngland.org.uk](mailto:sophie.cattier@HistoricEngland.org.uk)

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



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Historic England

EAST OF ENGLAND OFFICE

Mr Dylan Jones  
Mid Suffolk District Council  
131 High Street  
Needham Market  
Suffolk  
IP6 8DL

Direct Dial: 01223 582740

Our ref: P00615141

14 July 2017

Dear Mr Jones

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

**LAND ON THE WEST SIDE OF, BARTON ROAD, THURSTON, SUFFOLK  
Application No. DC/17/02232**

Thank you for your letter of 6 July 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

**Sophie Cattier**  
Assistant Inspector of Buildings and Areas  
E-mail: [sophie.cattier@HistoricEngland.org.uk](mailto:sophie.cattier@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](http://HistoricEngland.org.uk)



From: RM Floods Planning  
Sent: 22 August 2017 12:56  
To: BMSDC Planning Area Team Blue  
Cc: Dylan Jones  
Subject: 2017-08-22 JS Reply Land On The West Side Of, Barton Road, Thurston, Suffolk  
DC/17/02232

Suffolk County Council, Flood and Water Management have no further comments to add.

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411  
Fax: 01473 216864

**From:** RM Floods Planning  
**Sent:** 2 Aug 2017 10:25:53 +0100  
**To:** BMSDC Planning Area Team Blue  
**Cc:** Dylan Jones  
**Subject:** 2017-08-02 Land On The West Side Of, Barton Road, Thurston, Suffolk DC/17/02232

Suffolk County Council, Flood and Water Management have no further comments to add.

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411  
Fax: 01473 216864

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

**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) [<mailto:planningblue@baberghmidsuffolk.gov.uk>]  
**Sent:** 24 July 2017 13:37  
**To:** RM Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>  
**Subject:** Planning Re-consultation Request - DC/17/02232

Please find attached planning re-consultation request letter relating to planning application - DC/17/02232  
Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.



**From:** Jason Skilton  
**Sent:** 17 Jul 2017 08:51:50 +0100  
**To:** X Delete Aug 17 - Planning Emails  
**Cc:** Dylan Jones  
**Subject:** 2017-07-17 JS reply Land On The West Side Of, Barton Road, Thurston, Suffolk DC/17/02232

Dear Dylan Jones,

**Subject: Land On The West Side Of, Barton Road, Thurston, Suffolk DC/17/02232**

Suffolk County Council, Flood and Water Management have reviewed application ref **DC/17/02232**.

We have reviewed the following submitted documents and we recommend **holding objection at this stage**:

1. Flood Risk Assessment and Drainage Strategy 146/2015/FRA Rev B
  - a. Appendix A Location Plan
  - b. Appendix B Existing Foul Sewer Long section (*not reviewed*)
  - c. Appendix C Greenfield Rate Calculations
  - d. Appendix D Infiltration Report
  - e. Appendix F Indicative Surface Water Drainage Layout
  - f. Appendix G Hydraulic Modelling results
  - g. Appendix H Exceedance Flowpaths
  - h. Appendix I Anglian Water Pre-Planning Assessment Reports
  - i. Appendix J Typical SuDs Maintenance Schedule

The reason why we are recommending a holding objection is because, as this is a full application a full detailed design of the surface water drainage system (including its components) is required to be submitted with the application.

The points below detail the action required in order to overcome our current objection:-

1. Supply full detailed design of the surface water drainage system (including its components)

Pre-app	Outline	Full	Reserved Matters	Discharge of Conditions	Document Submitted
✓	✓	✓	<input type="checkbox"/>	<input type="checkbox"/>	Flood Risk Assessment/Statement (Checklist)
	✓	✓			Drainage Strategy/Statement & sketch layout plan (checklist)
	✓				Preliminary layout drawings
	✓				Preliminary "Outline" hydraulic calculations
	✓				Preliminary landscape proposals
	✓				Ground investigation report (for infiltration)
	✓	✓			Evidence of 3 <sup>rd</sup> party agreement to discharge to their system (in principle/consent to discharge)
		✓		✓	Maintenance program and ongoing maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	<b>Detailed flood &amp; drainage design drawings</b>
		✓	✓	✓	Full structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including infiltration test results (BRE365)
		✓	✓	✓	Detailed landscape details
		✓	✓	✓	Discharge agreements (temporary & permanent)
		✓	✓	✓	<b>Development management &amp; construction phasing plan</b>

Kind Regards

Jason Skilton

Flood & Water Engineer

From: Khan Wasil [mailto:Wasil.Khan@networkrail.co.uk] On Behalf Of Town Planning SE  
Sent: 18 July 2017 13:37  
To: BMSSDC Planning Area Team Blue  
Cc: Town Planning SE  
Subject: Planning Consultation Request - DC/17/02232 / Land On The West Side Of, Barton Road, Thurston, Suffolk

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application DC/17/02232 and offering us the opportunity to comment, please see our previous comments provided on application 4386/16

Kind Regards,

Wasil Khan  
Town Planning Technician, Property

Network Rail  
5th Floor  
1 Eversholt Street  
London NW1 2DN  
Tel: 07734 648485  
E:Wasil.khan@networkrail.co.uk  
[www.networkrail.co.uk/property](http://www.networkrail.co.uk/property)

## Consultation Response Pro forma

1	<b>Application Number</b>	DC/17/02232 as further amended Barton Road, Thurston	
2	<b>Date of Response</b>	7.9.17	
3	<b>Responding Officer</b>	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	<b>Summary and Recommendation</b> (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"> <li>no harm to a designated heritage asset because it have no material impact on the setting and significance of nearby listed buildings.</li> </ul>	
5	<b>Discussion</b> 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.	<p>The application has been further amended in respect of the site layout and number of units. The amendment results in no change to the impact on heritage assets, and I see no reason to vary from my earlier comment:</p> <p>Part of the site lies along Barton Road opposite the entrance to Mill Lane off which a track leads to Mill Farmhouse, some 260m north east of the nearest part of the site. The immediate setting of the farmhouse is densely treed, with modern utilitarian farm buildings to its south. Along Barton Road, Mill Lane, and the farm track are modern houses.</p> <p>Although the proposal would extend the area of residential development in the wider surroundings of the farmhouse, its wider setting is considered to make limited contribution to its significance because of the rather enclosed character of its immediate setting; the setting is also compromised by modern farm buildings and other 1900s development nearby. For these reasons the proposal is not considered to have material impact on the setting or significance of the listed farmhouse.</p>	
6	<b>Amendments, Clarification or Additional Information Required</b> (if holding objection)		

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.

	If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate	
7	<b>Recommended conditions</b>	

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.

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/17/02232 as amended Barton Road, Thurston	
<b>2</b>	<b>Date of Response</b>	25.7.17	
<b>3</b>	<b>Responding Officer</b>	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
<b>4</b>	<b>Summary and Recommendation</b> (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"> <li>no harm to a designated heritage asset because it have no material impact on the setting and significance of nearby listed buildings.</li> </ul>	
<b>5</b>	<b>Discussion</b> 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.	<p>The application has been amended in respect of the site layout. The amendment results in no change to the impact on heritage assets, and I see no reason to vary from my previous comment:</p> <p>Part of the site lies along Barton Road opposite the entrance to Mill Lane off which a track leads to Mill Farmhouse, some 260m north east of the nearest part of the site. The immediate setting of the farmhouse is densely treed, with modern utilitarian farm buildings to its south. Along Barton Road, Mill Lane, and the farm track are modern houses.</p> <p>Although the proposal would extend the area of residential development in the wider surroundings of the farmhouse, its wider setting is considered to make limited contribution to its significance because of the rather enclosed character of its immediate setting; the setting is also compromised by modern farm buildings and other 1900s development nearby. For these reasons the proposal is not considered to have material impact on the setting or significance of the listed farmhouse.</p>	
<b>6</b>	<b>Amendments, Clarification or Additional Information Required</b> (if holding objection)  If concerns are raised, can they be overcome with		

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.

	changes? Please ensure any requests are proportionate	
7	<b>Recommended conditions</b>	

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.

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	DC/17/02232 Barton Road, Thurston	
<b>2</b>	<b>Date of Response</b>	19.7.17	
<b>3</b>	<b>Responding Officer</b>	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
<b>4</b>	<b>Summary and Recommendation</b> (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"> <li>no harm to a designated heritage asset because it have no material impact on the setting and significance of nearby listed buildings.</li> </ul>	
<b>5</b>	<b>Discussion</b> 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.	Part of the site lies along Barton Road opposite the entrance to Mill Lane off which a track leads to Mill Farmhouse, some 260m north east of the nearest part of the site. The immediate setting of the farmhouse is densely treed, with modern utilitarian farm buildings to its south. Along Barton Road, Mill Lane, and the farm track are modern houses.  Although the proposal would extend the area of residential development in the wider surroundings of the farmhouse, its wider setting is considered to make limited contribution to its significance because of the rather enclosed character of its immediate setting; the setting is also compromised by modern farm buildings and other 1900s development nearby. For these reasons the proposal is not considered to have material impact on the setting or significance of the listed farmhouse.	
<b>6</b>	<b>Amendments, Clarification or Additional Information Required</b> (if holding objection)  If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		
<b>7</b>	<b>Recommended conditions</b>		

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.





# SUFFOLK CONSTABULARY

**Secured by Design**



Phil Kemp  
Design Out Crime Officer  
Bury St Edmunds Police Station  
Suffolk Constabulary  
Raynegate Street,  
Bury St Edmunds, Suffolk  
Tel: 01284 774141  
[www.suffolk.police.uk](http://www.suffolk.police.uk)

**Planning Application (DC/17/02232)**

**SITE: Land on the West Side of Barton Road, Thurston, Suffolk for 138 dwellings**

**Applicant: Mr Andrew Winstone, Bovis Homes**

**Planning Officer: N/k**

The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines.

Suppliers of suitably accepted products can be obtained by visiting [www.securedbydesign.com](http://www.securedbydesign.com).

Dear Planning Officer

Thank you for allowing me to provide an input for the above planning application for the proposed development of 138 dwellings at land on the west side Of Barton Road Thurston Suffolk.

I have viewed the available outline plans and would like to make the following comments on behalf of Suffolk Constabulary with regards to Section 17 of the Crime and Disorder Act.

My general observations for this development are that I applaud the designer's main concept of back to back properties to negate elongated alleyways and areas where offenders could commit crime.

However, I have a number of concerns relating this application; I note that there is one elongated alleyway between plots 78-82, which if not secured with a lockable alley gate could become a generator for crime.

I have concerns around the lack of natural surveillance and security resulting from the positioning of garages and car ports so far to the rear of most properties, allowing the opportunity for crime into a home owner's rear garden.

I strongly recommend that they are in line with the main property and not set back. Should the garages and car ports remain in their proposed locations, I recommend that dusk to dawn security lighting is installed to the side of the properties overlooking such installations and if possible the front of the car port is secured with lockable gates. (Secure By Design (SBD) New Homes 2016, page 62, Para 52.1 refers). Further surveillance from more or larger dwelling windows on the side of such properties would also assist.

I would like clarification that the detached properties leading to rear stores, such as at plots 2-3, 30-31, 36-37, 44-45, 63-64, 92-93, and affordable housing plots 8-13, 59-62, 110-111, 118-120, 136-137, will be secured with lockable alley gating.

I have serious concerns regarding the footpath on the south eastern side, near Marley Close, which I feel could be a generator for crime. This area needs to be open plan and well-lit with no

NOT PROTECTIVELY MARKED  
RESTRICTED/CONFIDENTIAL

light obstructions from surrounding trees or high sided vegetation. The path also needs to be wide enough for passers-by to feel safe as they meet other traffic from the opposite direction.

Further information on the security of footpaths can be found within "SBD New Homes 2016", under "Layout of roads and footpaths" on pages 14-17, Paras 8.1-8.19.

I note there is already a reasonable border line on the southern side with the current properties in that area.

There needs to be a strong perimeter between the new development and the surrounding existing properties at Marley Close, Roman Way and Heather Close, with either 1.8m close boarded fencing, or at least 1.5m close boarded fencing with 300cm trellis to allow more sunlight into the rear of these new properties, but retain security.

Further information on dwelling boundaries can be found at SBD New Homes 2016, pages 18-21, Paras 10.1-10.8.4.

I recommend that 1 metre metal hooped railings are installed around the planned main central communal area.

I would further strongly advise the developers seek Secure by Design National Building Approval membership from Secure by Design (SBD). Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

I would like to see the development, or at least the affordable housing built to Secured by Design SBD New Homes 2016 accreditation. Further information on SBD can be found at [www.securedbydesign.com](http://www.securedbydesign.com)

A further downloadable document can be obtained using the following link:

<http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

## **1.0 SECURE BY DESIGN (SBD)**

An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.

Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances natural surveillance and safety.

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

The role of the Designing Out Crime Officer (DOCO) within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a 'fortress environment'.

## **2.0 REFERRALS**

**2.11** Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.

- 2.12 The National Planning Policy Framework on planning policies and decisions to create safe and accessible environments, laid out in paragraphs 58 and 69 of the framework, emphasises that developments should create safe and accessible environments where the fear of crime should not undermine local quality of life or community cohesion.

## 2.2 The Suffolk Design Guide for Residential Areas- Shape of Development – Design Principles (Security)

Landscaping will play an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime. Whilst creating no particular problem in the short term, certain types and species of shrubs when mature have formed barriers where natural surveillance is compromised. This not only creates areas where intruders or assailants can lurk, but also allows attacks on vehicles to take place with little or no chance of being seen. Overgrown planting heightens the fear of crime, which often exceeds the actual risk. Planting next to footpaths should be kept low with taller varieties next to walls.

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural Liaison Officer (now referred to as Designing Out Crime Officer) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

## 2.3 Department for Transport – Manual for Streets (Crime Prevention)

The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that crime prevention considerations are taken into account in the design of layouts, it is important to consult police architectural liaison officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

To ensure that crime prevention is properly taken into account, it is important that the way in which permeability is provided is given careful consideration. High permeability is conducive to walking and cycling, but can lead to problems of anti-social behaviour if it is only achieved by providing routes that are poorly overlooked, such as rear alleyways.

*Safer Places* highlights the following principles for reducing the likelihood of crime in residential areas (Wales: also refer to Technical Advice Note (TAN) 129):

- the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space';
- access to the rear of dwellings from public spaces, including alleys, should be avoided – a block layout, with gardens in the middle, is a good way of ensuring this;
- cars, cyclists and pedestrians should be kept together if the route is over any significant length – there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;
- routes should lead directly to where people want to go;
- all routes should be necessary, serving a defined function;
- cars are less prone to damage or theft if parked in-curtilage (but see Chapter 8). If cars cannot be parked in-curtilage, they should
- ideally be parked on the street in view of the home.

- Where parking courts are used, they should be small and have natural surveillance;
- layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

### **3.0 GENERAL COMMENTS ON PROPOSED PLAN**

My specific observations for this development are as follows: (Further details of the following recommendations can be found in the above SDB document "Homes16").

- 3.1 Should any play equipment be installed it should meet BS EN 1176 standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to BS EN1177 standards.
- 3.2 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with BS EN1176. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.
- 3.3 All litter bins should be of a fire retardant material.
- 3.4 Attention should be paid to the sighting and fixing of Gates, Fences, Seats and Pathways. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading "Communal Areas" refers.
- 3.5 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.
- 3.6 Door chains/limiters fitted to front doors, meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer's recommendations. (SBD NH 2016 Para. 21.17).

### **4.0 CONCLUSION**

- 4.1 I strongly advise the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.
- 4.2 As of the 1<sup>st</sup> June 2016 the police lead Secure By Design (SBD) New Home 2016 was introduced, replacing the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards  
[http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured by Design Homes 2016 V1.pdf](http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured%20by%20Design%20Homes%202016%20V1.pdf)
- 4.3 SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide, namely Gold, Silver or Bronze standards. It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>
- 4.4 To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:
  - a. All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.

- b. All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).
- c. Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, or STS204 issue 3:2012, or LPS1175 issue 7:2010 Security Rating 1, or LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

The Police nationally promote Secured by Design (SBD) principles, aimed at achieving a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

## **5.0 FINAL CONCLUSION**

As stated I have serious concerns with regard to the rear positioning of the garages and car ports and that in some places car ports are used instead of garages.

I have serious concerns regarding the safety for users of the south eastern footpath and the need for the perimeter boundary to be secure.

I have concerns by plots 78-82, where there is an elongated alleyway and recommend this area is securely gated.

I hope the planners will adopt Secure By Design standards and apply the security principals stated within their Design Access Statement.

If the planners wish to discuss anything further or need assistance with the SBD application, please contact me on 01284 774141.

Yours sincerely



Phil Kemp

Designing Out Crime Officer Western and Southern Areas  
Suffolk Constabulary, Raynegate Street  
Bury St Edmunds,  
Suffolk, IP33 2AP

**From:** Nathan Pittam  
**Sent:** 06 July 2017 14:51  
**To:** X Delete Aug 17 - Planning Emails  
**Subject:** DC/17/02232. EH - Land Contamination.

**EP Reference : 196121**

**DC/17/02232. EH - Land Contamination.**

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

**Erection of 138 dwellings (including 48 affordable dwellings), construction of new vehicular access and provision of cycle /pedestrian link to Barton Road. Provision of road and drainage ...**

Many thanks for your request for comments in relation to the above application. I have reviewed the report provided that was authored by the Nott Group (ref . 72427/R/001) dated 23<sup>rd</sup> November 2015 and am generally satisfied that the report provides sufficient information against which to make a recommendation. I can confirm that I have no objection to the proposed development from the perspective of land contamination. The report does however conclude with the recommendation that a Phase II report is completed prior to any development commencing. Given the balance of evidence provided in the report I feel that we could not require this by means of condition but the developer may wish to undertake these works as a precautionary measure.

Regards

**Nathan Pittam BSc. (Hons.) PhD**  
Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

Email: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)

Work: 01449 724715

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**From:** Planning EE  
**Sent:** 25 Jul 2017 08:28:18 +0100  
**To:** BMSDC Planning Area Team Blue  
**Subject:** RE: Planning Re-consultation Request - DC/17/02232

Dear Sir/Madam

Thank you for your consultation. The amendments have no further effect on the strategic road network. Our original response may therefore remain in force.

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

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

From: [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) [<mailto:planningblue@baberghmidsuffolk.gov.uk>]  
Sent: 24 July 2017 13:35  
To: Planning EE  
Subject: Planning Re-consultation Request - DC/17/02232

Please find attached planning re-consultation request letter relating to planning application - DC/17/02232 - Land On The West Side Of, Barton Road, Thurston, Suffolk

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

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Highways England Company Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://www.gov.uk/government/organisations/highways-england>



## **Developments Affecting Trunk Roads and Special Roads**

### **Highways England Planning Response (HEPR 16-01)**

#### **Formal Recommendation to an Application for Planning Permission**

From: Martin Fellows  
Operations (East)  
[planningee@highwaysengland.co.uk](mailto:planningee@highwaysengland.co.uk)

To: Mid Suffolk District Council

CC: [growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: DC/17/02232

Referring to the planning application referenced above, dated 6 July 2017, 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 and open space, Land on the West Side of, Barton Road, Thurston, Suffolk, notice is hereby given that Highways England's formal recommendation is that we:

- a) offer no objection;
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- ~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is ~~is~~ not relevant to this application.<sup>1</sup>

---

<sup>1</sup> Where relevant, further information will be provided within Annex A.



**Signature:**

A black rectangular box redacting the signature.

**Date:** 21 July 2017

**Name:** David Abbott

**Position:** Asset Manager

**Highways England:**

Woodlands, Manton Lane

Bedford MK41 7LW

[david.abbott@highwaysengland.co.uk](mailto:david.abbott@highwaysengland.co.uk)

**Sent:** 24 July 2017 16:33  
**To:** BMSDC Planning Area Team Blue  
**Subject:** Response to planning application

I am sorry that I am unable to log into your on-line planning to log our response and am therefore emailing the details over :

Erection of 138 Dwellings on Land On The West Side Of Barton Road, Thurston, Suffolk.

Great Barton Parish Council (GBPC) has read and supports the concerns raised by Thurston Parish Council.

GBPC also **objects** to the application for the following reasons that are of relevance to this Parish:

1. The Transport Assessment (TA) submitted with the application fails to take into account the committed schemes within Bury St Edmunds, Ixworth and Stanton. These committed schemes will alter the baseline traffic flows along the road network that the TA has reviewed for this scheme. It is inappropriate to ignore these committed schemes and means that the true impact of this development is likely to be far worse;
2. The TA also ignores the proposals coming forward in Thurston, which although not yet approved will give rise to cumulative impacts if approved. The Council must understand the potential cumulative impact of these possible schemes before determining this application. Failure to do so will mean that mitigation measures to address this cumulative impact will not be fairly divided between the developments and may not be reasonable to request.
3. The findings of the TA suggest that the junction on the A143 adjacent to the Bunbury Arms does not require mitigation. This is a heavily congested junction that causes delay along the A143. It is inconceivable that the proposal does not impact on this junction - with or without other schemes.
4. Thurston Community College is the secondary school serving Great Barton. As such, schemes that influence the capacity of that school have a direct impact on the residents of Great Barton. This school is operating at capacity and SCC's latest Directory of Schools in Suffolk confirms that the school had more applications than places available last year. This is a school that has recently expanded to take on extra students during the previous education reorganisation. GBPC is concerned that school does not have sufficient capacity to support significant new residential development within its catchment area with a direct and negative consequence for the residents of Great Barton.
5. The boundary of the application site is adjacent to the parish boundary with Great Barton. That boundary is currently the rural edge of both Thurston and Great Barton. The character of this edge will be eroded by the proposed development with a negative impact on the rural character in this area. The proximity of housing to this edge provides insufficient space for meaningful landscape and variation in plot depth to mitigate this impact.

GBPC believes that the scheme in its current form is unacceptable and should not be approved. For the reasons given above GBPC considers that the proposal is contrary to the NPPF and that the benefits of the scheme are significantly and demonstrably outweighed by the impacts identified. The

proposal is not considered to represent sustainable development and therefore does not benefit from a presumption in favour of permission.

GBPC is also concerned that this proposal is undermining the Neighbourhood Plan-making process that Thurston Parish Council is currently undertaking. It is important that the Council gives this matter careful consideration and adequately addresses this point in its decision-making.

I understand there has been an amendment to this application and am awaiting details before confirming whether the Parish Council wishes to comment further.

*Linda*

Mrs Linda Harley (CiLCA)  
Parish Council Clerk and Responsible Financial Officer

**From:**Chris Ward  
**Sent:**24 Jul 2017 14:35:32 +0100  
**To:**Dylan Jones  
**Cc:**BMSDC Planning Area Team Blue;Steve Merry  
**Subject:**RE: Planning Consultation Request - DC/17/02232

Dear Dylan,

Thank you for consulting me in regards to the application for 138 dwellings at Land on the West Side of Barton Road in Thurston. I will be providing a response in regards to the Travel Plan that was submitted as part of the Transport Assessment. However to comply with internal protocol and the overarching principles of Travel Plans and Transport Assessments identified in the 2014 Planning Practice Guidance, this response will form part of the formal SCC Highway response.

If this causes you any issues please let me know as soon as possible.

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](mailto:chris.ward@suffolk.gov.uk)

web : <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/>

Place Services  
Essex County Council  
County Hall, Chelmsford  
Essex, CM1 1QH  
T: 0333 013 6840  
[www.placeservices.co.uk](http://www.placeservices.co.uk)  
@PlaceServices



Planning Services  
Mid Suffolk District Council,  
131 High Street,  
Needham Market,  
Suffolk IP6 8DL

27/07/2017

For the attention of: Dylan Jones

**Ref: DC/17/02232; Land on the west side of Barton Road, Thurston IP31 3NT**

Thank you for consulting us on the planning application for a residential development of 138 dwellings, new vehicular access and provision of a cycle/pedestrian link to Barton Road. This letter sets out our consultation response on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

#### **Recommendations**

In terms of the likely visual effect on the surrounding landscape, the proposals will inevitably have an impact on the existing rural edge character of Thurston. The main development constraint is the requirement to ensure the "character and appearance are safeguarded through the application of good design and landscape design principles".

The following points highlight our key recommendations for the submitted proposal:

- 1) The transition between the existing residential areas and proposed development need to be explored in a greater level of detail, to provide suitable levels of screening and the appropriate specification of planting which addresses the character of the surrounding landscape. It would be expected that a detailed boundary treatment plan and specification will be submitted as part of a planning condition if approved.
- 2) The landscape strategy needs to provide further details on hard landscaping materials and a planting palette for the development.
- 3) The Landscape Masterplan needs to be revised to match the layout plan design. Further street trees and road verge planting also needs to be added to primary roads to soften road edges and to match the character of the surrounding settlements.
- 4) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted as part of a planning condition, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment.

#### **The proposal**

The application plan sets out the application for a residential development of 138 dwellings, a new vehicular access and provision of a cycle/pedestrian link to Barton Road. This includes provision of a road and drainage infrastructure, landscaping and open space. All matters to be reserved with the exception of the main site access.



The site is located on the north-western edge of Thurston and adjoins the village settlement boundary. Thurston is a village and a parish in Suffolk situated about 4 miles (6 km) east of Bury St Edmunds and 10 miles (16km) west of Stowmarket. The site is currently in agricultural use and is surrounded by residential on three sides and farmland on the northern boundary.

#### **Review on the submitted information**

Relevant to this landscape review, the submitted application includes a Landscape Strategy, Landscape Appraisal, Site Layout and Design and Access Statement.

The Landscape Appraisal suitably describes the appropriate views on to the proposed development. It also explores the mitigation measures proposed as part of the boundary treatment and internal green spaces to a good standard. However, further detail is needed in the form of a detailed boundary treatment plan, which refers to existing and proposed trees and shrubs.

The Landscape Strategy gives good examples of how the landscape will be incorporated into the development. However, it fails to give example hard landscaping materials and planting species, which could be provided as palettes within the strategy document.

The Site layout plan shows the areas designated for residential development and open space, which is located centrally on the site. The layout plan and corresponding tree survey suitably demonstrates how the green infrastructure responds to the layout and context of the site. But it would be advised that more street trees are included on primary roads, along with road verge planting where possible to soften street edges. It also worth noting that the landscape masterplan within the strategy does not correlate with the Layout plan (Ref: DC\_17\_02232-AMENDED\_LAYOUT\_PLAN-3050480). More street trees (which are the preferred option) are shown on the layout plan, but that these have not transitioned onto the landscape masterplan. Furthermore, as the proposal develops, a greater level of detail will be required, especially the connectivity between the green infrastructure and surrounding green spaces outside the site boundary. This will need to be in the form of a detailed landscape and boundary planting plan, landscape maintenance plan and specification

#### **Likely impact on the surrounding landscape**

The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of the Plateau estate farmlands landscape character type. Some of the key characteristics for the Plateau estate farmlands landscape character type are flat landscapes of light loams and sandy soils, large scale rectilinear field pattern, network of tree belts and coverts, large areas of enclosed former heathland and 18th- 19th & 20th century landscape parks. There is an expectation that many of these landscape principles will be designed into the emerging development proposals.

As part of a site appraisal it is clear that the key sensitive edge is the southern and western boundary where the existing dwellings will overlook the proposed development. Elsewhere, views along the existing public rights of way will also be greatly affected.

#### **Proposed mitigation**

The proposal shows areas of water attenuation and green open space in the centre of the proposed development. As part of this feature, there are opportunities to include areas of habitat creation with the introduction of an appropriate planting schedule.

Views from the existing footpath on Barton Road have been thought through with dwellings set back from the road. However the hard landscaping materials used on the roads and pathways should be carefully designed to encompass the fairly rural character of the area.

Yours sincerely,

Ryan Mills BSc (Hons) LMLI  
Landscape Consultant  
Telephone: 03330320591



Place Services is a traded service of Essex County Council



Essex County Council



7 August 2017

Dylan Jones  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Needham Market  
Ipswich  
IP6 8DL

By email only

Hi Dylan

**Application: DC/17/02332**

**Location: Land on the west side of Barton Road, Thurston IP31 3NT**

**Proposal: 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**

Thank you for consulting Place Services on the above application.

**No objection subject to securing biodiversity mitigation and enhancement measures**

The submitted Ecological Survey report (MHE Consulting, April 2017) includes information to assess the impacts of development on skylarks and provides sufficient ecological information for determination.

**Recommendations**

The mitigation measures identified in the ecological report (MHE Consulting, April 2017) should be secured and implemented in full. This is necessary to conserve and enhance Protected and Priority Species particularly bats, reptiles, hedgehogs and breeding birds.

Impacts will be minimised such that the proposal is acceptable subject to the above conditions based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

Submission for approval and implementation of the details below should be a condition of any planning consent.

**I. PRIOR TO COMMENCEMENT: COMPLIANCE WITH ECOLOGICAL APPRASAL RECOMMENDATIONS**



*"All ecological mitigation measures and/or works shall be carried out in accordance with the details contained in the Ecological report (MHE Consulting April 2017) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.*

**Reason:** To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

**II. PRIOR TO COMMENCEMENT: SKYARK MITIGATION STRATEGY**

*"A skylark mitigation strategy shall be submitted for approval and implemented in full to mitigate the loss of nesting habitat."*

**Reason:** To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

**III. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME**

*"Prior to occupation, a lighting design scheme for biodiversity" shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.*

*All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."*

Please contact me with any queries.

Best wishes

**Sue Hooton CEnv MCIEEM BSc (Hons)**  
Principal Ecological Consultant  
Place Services at Essex County Council  
[sue.hooton@essex.gov.uk](mailto:sue.hooton@essex.gov.uk)

**Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.



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Planning Services  
Mid Suffolk District Council,  
131 High Street,  
Needham Market,  
Suffolk IP6 8DL

23/08/2017

For the attention of: Dylan Jones

**Ref: DC/17/02232; Land on the west side of Barton Road, Thurston IP31 3NT**

Thank you for consulting us on the planning application for a residential development of 129 dwellings, new vehicular access and provision of a cycle/pedestrian link to Barton Road. This letter sets out our re-consultation response based on the submission of a revised landscape report and revised plans received on the 18/08/17 and the change of description detailing the reduction in dwellings from 138 to 129.

#### **Recommendations**

The following points highlight our key recommendations based on the additional information submitted for the proposal:

- 1) The transition between the existing residential areas and proposed development need to be explored in a greater level of detail, therefore it would be expected that a detailed boundary treatment plan and specification will be submitted as part of a planning condition if approved.
- 2) A detailed landscape planting plan (which clearly sets out the existing and proposed planting species), landscape maintenance plan and specification, will need to be submitted as part of a planning condition, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment.

#### **Review on the submitted information**

In terms of the likely visual effect on the surrounding landscape, the proposals will inevitably have an impact on the existing rural edge character of Thurston. The main development constraint is the requirement to ensure the "character and appearance are safeguarded through the application of good design and landscape design principles".

Relevant to this landscape review, the submitted application includes a revised Landscape Strategy, Landscape Appraisal, and revised Site Layout.

The Landscape Appraisal suitably describes the appropriate views on to the proposed development. It also explores the mitigation measures proposed as part of the boundary treatment and internal green spaces to a good standard. However, further detail is needed in the form of a detailed boundary treatment plan, which refers to existing and proposed trees, shrubs and planting will need to be submitted as part of a planning condition.

The revised Landscape Strategy gives good examples of how the landscape will be incorporated into the development. It also now includes example of hard landscaping materials and planting species which reflect the context and surrounding settlements. However, more consideration should be given to verge planting, with ground cover and herbaceous planting included as well as structural shrubs.

The Site layout plan shows the areas designated for residential development and open space, which is located centrally on the site. The layout plan and corresponding tree survey suitably demonstrates how the green



infrastructure responds to the layout and context of the site. However, as the proposal develops, a greater level of detail will be required. This will need to be in the form of a detailed landscape planting plan, landscape maintenance plan and specification

Yours sincerely,

Ryan Mills BSc (Hons) LMLI  
Landscape Consultant  
Telephone: 03330320591  
Email: [ryan.mills@essex.gov.uk](mailto:ryan.mills@essex.gov.uk)

N.B. This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to the particular matter.

**From:** RM Floods Planning  
**Sent:** 2 Aug 2017 10:25:53 +0100  
**To:** BMSDC Planning Area Team Blue  
**Cc:** Dylan Jones  
**Subject:** 2017-08-02 Land On The West Side Of, Barton Road, Thurston, Suffolk DC/17/02232

Suffolk County Council, Flood and Water Management have no further comments to add.

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411  
Fax: 01473 216864

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

**From:** [planningblue@baberghmidsuffolk.gov.uk](mailto:planningblue@baberghmidsuffolk.gov.uk) [<mailto:planningblue@baberghmidsuffolk.gov.uk>]  
**Sent:** 24 July 2017 13:37  
**To:** RM Floods Planning <[floods.planning@suffolk.gov.uk](mailto:floods.planning@suffolk.gov.uk)>  
**Subject:** Planning Re-consultation Request - DC/17/02232

Please find attached planning re-consultation request letter relating to planning application - DC/17/02232  
Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

**From:** Philippa Stroud  
**Sent:** 07 August 2017 13:57  
**To:** BMSDC Planning Mailbox  
**Cc:** Ian Ward  
**Subject:** DC/17/02232 Land On The West Side Of, Barton Road, Thurston - EH Other Issues

WK/196122

**APPLICATION FOR PLANNING PERMISSION - DC/17/02232 EH –  
Noise/Odour/Light/Smoke**

**Proposal:** Erection of 138 dwellings (including 48 affordable dwellings), construction of new vehicular access and provision of cycle /pedestrian link to Barton Road.

Provision of road and drainage infrastructure and open space (second application)

**Location:** Land On The West Side Of, Barton Road, Thurston, Suffolk

Thank you for the opportunity to comment on the above application.

The application site is close to a number of existing residential dwellings and for this reason there is a risk of loss of amenity during the construction phase of the development. I would, therefore, recommend that a construction management plan be required by means of condition.

Such a plan shall include details of operating hours (which shall be limited to 08.00hrs – 18.00hrs Monday – Friday, 09.00hrs – 13.00hrs on Saturdays, with no working to take place on Sundays, Public or Bank Holidays. Deliveries should also be limited to these hours), means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors), loading and unloading of plant and materials, wheel washing facilities, lighting, location and nature of compounds and storage areas, waste removal, temporary buildings and boundary treatments, dust management, noise management and litter management during the construction phase of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phase, unless otherwise agreed in writing by the Local Planning Authority.

**Note:** the Construction Management Plan shall cover both 'site clearance' and the construction phase of the above development.

Regards,

Philippa Stroud  
Senior Environmental Protection Officer  
**Babergh and Mid Suffolk District Councils - Working Together**

Telephone: 01449 724724

Email: [Philippa.Stroud@baberghmidsuffolk.gov.uk](mailto:Philippa.Stroud@baberghmidsuffolk.gov.uk)

Websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:**LDF  
**Sent:**22 Aug 2017 13:45:38 +0100  
**To:**BMSDC Planning Area Team Blue  
**Subject:**RE: Planning Re-consultation Request - DC/17/02232

Good afternoon,

David Sparkes has advised that his response to the previous version (9th August) is sufficient with no need for further comment on the amended re-consultation.

Kind regards,

Emily Thompson-Golding  
ATSO – Strategic Planning Policy  
Babergh & Mid Suffolk District Council – Working Together  
Council Offices, Corks Lane, Hadleigh IP7 6SJ  
Tel. 01473 825881 ext. 2281  
Email: [Emily.Thompson-Golding@babberghmidsuffolk.gov.uk](mailto:Emily.Thompson-Golding@babberghmidsuffolk.gov.uk)  
Websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

\*\*\* Community Infrastructure Levy (CIL) is now adopted in Mid Suffolk and Babergh. Charging starts on 11th April 2016. See our websites for the latest information here: CIL in Babergh and CIL in Mid Suffolk  
\*\*\*\*

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

**From:** [planningblue@babberghmidsuffolk.gov.uk](mailto:planningblue@babberghmidsuffolk.gov.uk) [<mailto:planningblue@babberghmidsuffolk.gov.uk>]  
**Sent:** 18 August 2017 16:38  
**To:** LDF <[ldf@babberghmidsuffolk.gov.uk](mailto:ldf@babberghmidsuffolk.gov.uk)>  
**Subject:** Planning Re-consultation Request - DC/17/02232

Please find attached planning re-consultation request letter relating to planning application - DC/17/02232 - Land On The West Side Of, Barton Road, Thurston, Suffolk

Kind Regards

Planning Support Team

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Babergh District Council and/or Mid Suffolk District Council shall be understood as neither given nor endorsed by Babergh District Council and/or Mid Suffolk District Council.

**Consultation comments and planning policy background –**

**on behalf of Strategic Planning, Babergh and Mid Suffolk, 9 August 2017**

**DC/17/02232 |** Erection of 138 dwellings (including 48 affordable dwellings), construction of new vehicular access and provision of cycle /pedestrian link to Barton Road. Provision of road and drainage infrastructure and open space (second application) | Land on The West Side of Barton Road Thurston Suffolk

The site is outside the settlement boundary for Thurston in the 1998 Mid Suffolk Local Plan and adjoins the boundary with St Edmundsbury Borough Council

A new Babergh and Mid Suffolk joint Local Plan is currently being prepared, with a draft consultation document (Regulation 18) to be issued in late summer 2017. This will address the future housing requirements across the two Districts.

In the meantime, there is a current shortfall in 5 year housing land supply in Mid Suffolk so planning proposals need to be considered in the context of the NPPF and its requirements for sustainable development. These include the need for the planning system to coordinate development requirements including provision of infrastructure.

Suffolk County Council will advise on key infrastructure requirements and capacities, including education, waste management, sustainable drainage, highways and transport, including cumulative impact, with a number of other sites already proposed in Thurston, totalling nearly 700 houses. There has been collaborative working between Babergh / Mid Suffolk, developers and infrastructure providers to address the provision of infrastructure in Thurston and the sustainability of development.

Thurston has been considered to be a sustainable location, with its classification as a “Key Service Centre” in the Mid Suffolk Core Strategy, 2008. This is in view of its range of local services and facilities and accessibility by road and rail to nearby Bury St Edmunds.

NPPF requirements for sustainable development also relate to the quality of development, including local distinctiveness, character and appearance.

A Neighbourhood Plan is being produced by Thurston Parish Council, but this has not yet reached an advanced stage.

The proposal for 48 of the 138 homes to be affordable housing would comply with the Local Plan policy for up to 35% to be affordable housing ( Mid Suffolk Local Plan First Alteration – Affordable Housing, 2006).

David Sparkes,

Strategic Planning

Babergh & Mid Suffolk

9.8.2017

**From:** Andrea Stordy  
**Sent:** 22 August 2017 09:14  
**To:** BMSDC Planning Area Team Blue  
**Subject:** FAO: Dylan Jones

Planning Application: DC/17/02232  
Location: Land On The West Side Of Barton Road, Thurston

Good Morning,

Thank you for your letter of 18/08/2017.

Please be advised that we have made formal comment on Land West of Barton Road, Thurston, under planning application 4386/16, for 138 dwellings, which we note has been published. This may remain in place for the re-consultation of Land West of Barton Road, Thurston for 129 dwellings.

If you have any queries, please email them to [water.hydrants@suffolk.gov.uk](mailto:water.hydrants@suffolk.gov.uk), quoting Fire Ref.: F305633.

Kind regards,

Sent on behalf of the Water Officer

Andrea Stordy  
BSC  
Admin to Water Officer  
Engineering  
Fire and Public Safety Directorate  
Suffolk County Council  
3rd Floor, Lime Block  
Endeavour House  
Russell Road  
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Tel.: 01473 260564  
Team Mailbox: [water.hydrants@suffolk.gov.uk](mailto:water.hydrants@suffolk.gov.uk)





Midlands & East (East)  
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Essex CM2 5PF

Email address: [kerryharding@nhs.net](mailto:kerryharding@nhs.net)

Telephone Number – 0113 824 9111

Your Ref: DC/17/02232

Our Ref: NHSE/MIDS/17/02232/KH

Planning Services  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Needham Market, IP6 8DL

23 August 2017

Dear Sirs,

**Erection of 129 dwellings (including 45 affordable dwellings), construction of new vehicular access and provision of cycle /pedestrian link to Barton Road. Provision of road and drainage infrastructure and open space (second application on the site with reduced dwellings – other is 4386/16).**

**Land on the west side of Barton Road, Thurston, IP31 3NT.**

1. I refer to your re-consultation letter on the above planning application and advise that, following a review of the applicants' revised submission the following comments are with regard to the Primary Healthcare provision on behalf of NHS England Midlands and East (East) (NHSE), incorporating West Suffolk Clinical Commissioning Group (CCG).

#### **Background**

2. The proposal comprises a development of 129 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

#### **Review of Planning Application**

3. There is 1 GP practice within a 2km radius (or closest to) the proposed development. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

#### **Healthcare Impact Assessment**

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.

*High quality care for all, now and for future generations*

5. The primary healthcare service directly impacted by the proposed development and the current capacity position is shown in Table 1.

**Table 1: Summary of capacity position for healthcare services within a 2km radius of (or closest to) the proposed development.**

Premises	Weighted List Size <sup>1</sup>	NIA (m <sup>2</sup> ) <sup>2</sup>	Capacity <sup>3</sup>	Spare Capacity (NIA m <sup>2</sup> ) <sup>4</sup>
Mount Farm Surgery	12,244	768.40	11,206	-71.19
<b>Total</b>	<b>12,244</b>	<b>768.40</b>	<b>11,206</b>	<b>-71.19</b>

**Notes:**

1. The weighted list size of the Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
  2. Current Net Internal Area occupied by the Practice.
  3. Based on 120m<sup>2</sup> per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services".
  4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment, extension, or relocation at Mount Farm Surgery would be sought from the CIL contributions collected by the District Council.
7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to reconfigure the above mentioned surgery. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

**Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising**

8. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.
9. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.
10. NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Mid Suffolk District Council.

NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

Yours faithfully



Kerry Harding  
Head of Estates