

Subject:FW: Mid Suffolk District Council Planning Applications 5070/16, 2797/16, 4963/16, 4942/16, 4386/16

From: jillian rowland

Sent: 11 July 2017 21:53

To: sajid.iavid.mp@parliament.uk

Cc: BMSDC Planning Mailbox; Sarah Mansel; John Levantis; Jane Storey

Subject: Mid Suffolk District Council Planning Applications 5070/16, 2797/16, 4963/16, 4942/16, 4386/16

Dear Mr. Javid,

Thurston Parish Council have informed my Council of the above applications due to be determined by the MSDC Planning Referrals Committee on 12th July.

My Council would like to make the following observations and comments for consideration:

1. These sites will deliver approximately 830 dwellings. It is considered this will create pressure on the surrounding small village roads.
2. Although there is consideration for primary school provision, there is still likely to be an impact on our small village school which is already full, and suffers, like most schools, from traffic congestion around the school and village hall car park.
3. There will also be a large impact on Thurston Upper School.
4. The general infrastructure in and around Thurston will be stretched.
5. Medical provision both GP and Hospital will be required, as will retail outlets. With the closure of rural police stations, policing will be stretched.
6. Broadband in certain areas is very poor. Currently large sections of Norton are still unable to access fibre optic broadband.

My Council would look to be informed of the decision of these applications in due course.

Yours sincerely,

Jillian Rowland (Mrs)

Clerk to Norton Parish Council

Our Ref: 570/CON/4963/16
Date: 11th July 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk



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

For the Attention of: Dylan Jones

Dear Dylan

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/4963/16

PROPOSAL: Planning Application 4963/16 Outline Planning Application sought for up to 250 new dwellings, open space, and associated infrastructure, and up to 4.4 ha of land for educational uses for Thurston Community College and a new Primary School site, including details of access on land west of Ixworth Road

LOCATION: Ixworth Road, Thurston, Suffolk

ROAD CLASS: C

This letter is complimentary to that ref 570/CON/4963/16 dated 10th March 2017 and 3rd April 2017 which details Suffolk County Council's response to the cumulative effect that five developments in the parish of Thurston will have on the highway infrastructure.

Notice is hereby given that Suffolk County Council as Highways Authority does not object subject to a S106 planning obligation to its satisfaction and the following conditions being applied to any permission granted to it.

Introduction

Planning applications have been submitted to develop five sites around the village of Thurston. It was recognised at an early stage by the Planning Authority and Highways Authority that collaboration between all parties could provide a more effective package of infrastructure improvements supporting these developments than could be obtained by treating each as an individual application. The proposed Highway Conditions and Obligations in this letter are a result of the collaboration between Developers, their Agents, the Local Planning Authority and the Highways Authority over a number of months. It is recognised that the measures will not resolve all transport issues in and around Thurston but are proportional to the scale of development and mitigate those issues that are considered through the data presented to be severe.

If one or more of the five sites are not granted approval by the Local Planning Authority it is strongly recommended that the conditions and obligations contained in this response are reconsidered so that they provide robust mitigation for the impact of those sites granted planning permission.

Site Access

1. Condition: No other part of the development shall be commenced until the new vehicular accesses have been laid out and completed in all respects in accordance with Drawing No. 06/011 Rev F and with an entrance width of 6.3 meters and been made available for use.

Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

2. Condition: Before the access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 120 metres in each direction along the edge of the metalled carriageway from the centre of the access (Y dimension) or tangential to the nearside edge of the metalled carriageway, whichever is the more onerous. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.

Comment: The visibility requirements are based on an extension of the 30mph speed limit north along Ixworth Road as listed in the proposed S106 obligations. If this obligation is removed the Highways Authority advise that the visibility requirements within Condition 2 are reconsidered.

3. Condition: The highway element of the development shall not commence until the Road Safety Audit (stages 1 and 2) process has been carried out in accordance with the Suffolk County Council Road Safety Audit Practice and Guidance and any necessary amendments or changes undertaken. The development shall not be [occupied / open for public access] until any requirements under stage 3 of the Road Safety Audit have been completed or a programme of remedial works has been agreed.

Reason: In the interests of highway safety to ensure the approved layout is properly designed.

4. Condition: No other part of the development shall be commenced until details of the emergency access off Mill Lane as shown on the indicative plan 06/013 Rev – are submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

5. Condition: No more than 150 dwellings shall be occupied until the emergency access off Mill Lane is completed and available for use by emergency vehicles.

Reason: To ensure that a suitable alternative emergency access is available into the development.

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

Internal Highway layout

Note: The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

6. Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing, lighting, traffic calming and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of highway safety to ensure that roads/footways are constructed to an acceptable standard.

7. Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better

in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: In the interests of highway safety to ensure that satisfactory access is provided for the safety of residents and the public.

8. Condition: Before the development is commenced details of the areas to be provided for the manoeuvring and parking of vehicles including electric vehicle charging points, powered two vehicle provision, secure covered cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.

9. Condition: Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users in the interests of highway safety.

10. Condition: Before the development is commenced details shall be submitted to and approved in writing by the County Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway in the interests of highway safety.

11. Condition: Prior to the commencement of any part of the development details of the proposed tree planting and landscaping shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out as approved.

Reason: to ensure new trees are not planted close to roads and that they have an approved root direction system to prevent damage to the roads and footways and to ensure that visibility splays remain unobstructed by proposed planting.

Construction Management Plan

12. Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out

other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) details of proposed means of dust suppression
- h) details of measures to prevent mud from vehicles leaving the site during construction
- i) haul routes for construction traffic on the highway network and
- j) monitoring and review mechanisms.
- K) Details of deliveries times to the site during construction phase

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

Footway and cycle connectivity

13. Condition: Construction of a metalled 3.0m (nominal width) footway / cycleway on Ixworth Road between the site entrance and Norton Road as shown on Drawings 06/011 Rev F and 06/12 Rev A. Where the footway lies without the current limits of the public highway the contractor shall arrange for adoption of these areas via the S38 process.

Reason: To provide pedestrian access between the site and the main village via Station Hill and to include all parts of the footway within the public highway.

14. Condition: Construction of a metalled 2.0m (nominal width) footway on Ixworth Road between the site entrance and Thurston Rugby Club as shown on Drawing 06/011 Rev F.

Reason: To provide pedestrian access between the main village and the Rugby Club and link the development with the wider PRow network.

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding

arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

Public Rights of Way (PRoW)

Note: The public right of way Thurston Footway 18 cannot be lawfully driven along without due authority. This highway must remain unobstructed at all times. It is an offence to disturb the surface of the highway so as to render it inconvenient for public use. Therefore it is imperative that the surface is properly maintained for lawful use during the construction phase and beyond.

The Highway Authority will seek to recover the cost of any such damage which it actions for repair.

Comment: Changes to the alignment of, or additions to the existing PRoW network (eg spurs to the proposed school site) must be agreed with the relevant SCC PRoW Officer. Care should be taken not to create a canyon effect by confining footpaths between linear features such as walls, high hedges and fences.

Proposed S106 Highways Contributions

All contributions must be appropriately index linked. Any of the above contributions unspent or not committed 5 years following occupation of the final dwelling to be repaid.

1. Improvements to PRoW Thurston 001 between Meadow Lane and Ixworth Road. A contribution of £8889 is required on completion of 50% of the total number of dwellings.
2. Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction. A contribution of £27297 is required on occupation of the first dwelling.
3. Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £86911 is required on commencement of construction work on site.
4. Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a 40mph speed limit on the C692 Thurston Road. A contribution of £15780 is required on commencement of the first dwelling.
5. Extension of the 30mph speed limit to Thurston Rugby Club. A contribution of £8000 is required on commencement of work on site.

The S106 proposals are based on the assumption of a collaborative approach as outlined in our letter of the 10th March 2017. If this site is determined as a stand-alone application these conditions and contributions would be re-assessed.

Travel Plan and S106 Contributions

The Residential Travel Plan (dated November 2016) that was submitted to support the application for the proposed 250 dwelling development in Thurston has identified some suitable measures and targets to mitigate the highway impact from the development. However there is some further work that will need to be done to the Travel Plan for it to be fully compliant with current planning guidance:

- The 384 and 385 bus services that serve within the vicinity of the proposed development would only be suitable for commuting to Bury St Edmunds for a typical 9am to 5pm shift. The times and frequencies would not be suitable for commuting to Stowmarket, which is an employment destination for residents of Thurston identified by the 2011 Census. There will need to be further reference in the Travel Plan on how this issue could be overcome.
- There must be a commitment included in the Travel Plan to fully implement and monitor the Travel Plan for a minimum of five years, or one year after occupation of the final (250th) dwelling, whichever is longest. This will ensure that if the development takes longer than five years to build-out the Travel Plan will continue to be implemented until full completion of the development. Also the baseline Travel Plan monitoring should commence on occupation of the 100th dwelling, as undertaking this monitoring on occupation of the 50th dwelling is unlikely to provide representative resident travel data for the site.
- A Full Travel Plan, that includes the site-specific baseline data and some revised measures should be submitted for approval on occupation of the 100th dwelling.
- The provision of a £100 public transport voucher is a good measure and welcomed by SCC. However there should be an option for the resident to receive an alternative cycle voucher of equivalent value if they feel that the public transport voucher would not be of benefit to them. This option will need to be included in the Travel Plan.
- The Welcome Pack should also offer a Personalised Travel Planning service to demonstrate all the sustainable transport options for each residents regular journeys (i.e. commuting).
- In regards to the proposed 'walking bus' measure to the local primary schools; has this been discussed with the existing primary school, as this measure is likely to require additional resource for the school? Evidence of the outcomes of the discussions with the school must be included in the Travel Plan.
- The 15% target for a reduction in single-occupancy vehicle travel is a good target. However on reviewing the supporting Transport Assessment (dated November 2016) there is no reference to the Travel Plan target being applied to reduce the highway impact generated by the development. This goes against the overarching principles in the "Travel Plans, Transport Assessments and Statements in Decision-taking" section of the 2014 Planning Practice Guidance. Therefore reference to the overarching of the Travel Plan and Transport Assessment will need to be applied to both documents.
- The Travel Plan does not identify any remedial measures in the event that the Travel Plan targets and objectives are not met by the end of the monitoring period. Some examples of suitable remedial measures must be included in the Travel Plan.
- The applicants estimated cost of implementing the Travel Plan (£65,837.50) is considerably less than SCC's workings out (£127,975). On reviewing these costs the applicant has possibly underestimated the costs of employing the Travel Plan Coordinator, as that would usually require using a Transport Consultancy Company. SCC works out that the Travel Plan Coordinator will cost up to £35 per

hour and will work up to 270 hours (11.25 hours per month) on years 1 and 2, 450 hours (18.75 hours per month) on years 3 and 4, and 1350 hours (37.5 hours per month) on years 5 to 7.

A revised Travel Plan that takes into account the comments raised above, should be submitted for approval prior to the determination of the application for reserved matters.

These revisions need to comply with National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people.
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Other relevant paragraphs include 34, 35, 36 and 37 as well as the "Travel Plans, Transport Assessments and Statements in Decision-taking" section of the 2014 Planning Practice Guidance.

In addition, a decent quality travel plan will also support Core Strategy Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

To ensure there is sufficient resource for Suffolk County Council to engage with the Travel Plan and there are certainties that the Travel Plan will be implemented in full; the following Section 106 contributions are required:

6. Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the travel plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.
7. Travel Plan Implementation Bond, or cash deposit - £127,975 (£512 per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.

The implementation of the Travel Plan should be secured solely by Section 106 obligations. A planning condition will be insufficient due to the size and possible phasing of the development. Therefore the following elements of the Travel Plan should be secured by Section 106 obligations:

- Implementation of the Interim Travel Plan (when approved)
- Provision of an approved welcome pack to each dwelling on first occupation

- Approval and full implementation of the Full Travel Plan
- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

All the contributions and obligations have taken into account CIL regulation 122 and are:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

Full wording for the proposed Section 106 obligations can be supplied at a later date if planning permission is granted.

Also the following planning condition will be required:

Submission and approval of a School Travel Plan prior to the commencement of the proposed Primary School development

Yours sincerely,

Steve Merry
Transport Policy and Development Manger
Resource Management



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

Planning Application (DC/4963/16)

SITE: Land on the West Side of Ixworth Road, Thurston, Suffolk for up to 250 dwellings

Applicant: Mr Chris Sperrin, Persimmon Homes

Planning Officer: Mr John Pateman Gee

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.

Dear Mr Pateman Gee

Thank you for allowing me to provide an input for the above planning application for the proposed development of up to 250 dwellings at land west of Ixworth 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.

I take on board that this is an initial outline planning application and that further details will be forwarded by the developers at the Reserved Matters stage. As a result I feel that at present I do not have the level of detail I require to make specific individual comments in relation to 'designing out crime' for this outline application. However, I recommend that the development should seek to achieve Secured by Design SBD New Homes 2016 accreditation. Further information can be found at www.securedbydesign.com.

To their credit the developers have highlighted that the layout will provide a safe, healthy accessible and attractive place for residents to live, encouraging social cohesion and reduction in crime and the fear of crime through adherence to secure by design principles and I hope that will be the case throughout the proposed development.

The developers have further stated that the layout will be designed to make the best use of the site, maintaining an active street frontage allowing for natural surveillance over public spaces to maximise crime prevention, which again I trust will be the case.

The developers also state that in the main the properties will have garages. I hope that will be the case, rather than insecure car ports and that they will not be set back from the property as is often the case in modern day proposed developments, which assist offenders to gain easier access to rear gardens and negate good natural surveillance for such areas. Secure By Design (SBD) New Homes 2016, "Car Parking", page 22, Para 16.1 – 16.5 and page 62 Para 51.1-51.3 refer).

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I would like to know more about the division of the boundaries for the rear of properties and confirm that there will not be any elongated alleyways within this development. Further information on dwelling boundaries can be found at SBD New Homes 2016, pages 18-21, Paras 10.1-10.8.4.

I would like to know more about how the current footpath will be incorporated into the development and that it will not compromise the security of people using this route. 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 would like to know more about the details for the proposed perimeter for the development.

I have serious concerns regarding the lack of recognised parking for the proposed primary school site, I do not believe as stated on the development plan that vehicle drivers will use subsidiary roads within the new development, but will instead drop off on or by the main road. This will lead to traffic hazards and the possibility of Anti-Social Behaviour (ASB) issues usually related to school drop off sites. I know that the developers have stated they will implement traffic calming measures at regular intervals along the side of the road. I do not, however, believe this will be a sufficient enough deterrent.

Should a primary school be built within this proposed new development, I would like to see it built in line with Secure By Design for schools 2014 at <http://www.securedbydesign.com/wp-content/uploads/2015/09/New-Schools-2014.pdf>

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

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 advice 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 1st 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

- 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 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 a result I feel that at present I do not have the level of detail I require to make specific individual comments in relation to 'designing out crime' for this outline application.

I have serious concerns about parking for the proposed Primary School and I would like more details as to how the development will be designed in order to reduce the risk of crime, by good surveillance and secure design, especially for the rear gardens and vehicle parking.

I strongly recommend that any proposed school or additions to any existing school are designed in line with Secure By Design for schools 2014 at <http://www.securedbydesign.com/wp-content/uploads/2015/09/New-Schools-2014.pdf>

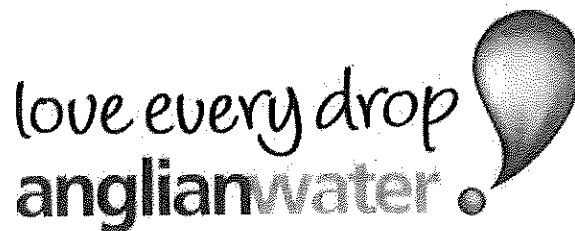
I hope the planners will adopt Secure By Design standards and apply the security principals stated within their Planning and Design Access Statements.

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



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00022815

Local Planning Authority: Mid Suffolk District

Site: Land West Of Ixworth Road, Thurston

Proposal: Outline Planning Application for up to 250 new dwellings, open space and associated infrastructure, up to 4.4Ha of land for educational uses for Thurston Community College, and a new Primary School site, including details of access on land west of Ixworth Road.

Planning Application: 4963/16

Prepared by: Pre-Development Team

Date: 09 August 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

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 The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

Section 4 – Surface Water Disposal

- 4.1 The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option.

Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

- 4.2 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would therefore recommend that the applicant needs to consult with Anglian Water and the Lead Local Flood Authority (LLFA).

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

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.

Surface Water Disposal (Section 4)

CONDITION

No drainage works shall commence until a surface water management strategy has been submitted to and approved in writing by the Local Planning Authority. No hard-standing areas to be constructed until the works have been carried out in accordance with the surface water strategy so approved unless otherwise agreed in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

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

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

Thanks.

Dylan Jones

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

Dear Dylan Jones and Graham Dixon

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

2797/16 – 175 dwellings

4386/16 – 138 dwellings

4942/16 - 64 dwellings

4963/16 – 250 dwellings

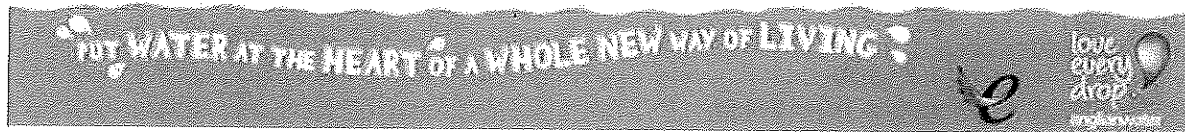
5070/16 - 200 dwellings

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

I hope this helps.

Kind regards,
Hannah Wilson
Pre-Development Planning Manager

Developer Services
Anglian Water Services Limited
Tel Office: 0345 0265 458
Mobile: 07885135312
Thorpe Wood House, Thorpe Wood, Peterborough, PE3 6WT
www.anglianwater.co.uk



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Anglian Water Services Limited

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Please consider the environment before printing this email.

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

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

For the Attention of: Dylan Jones

Dear Dylan

Thurston Cumulative Development: Network Rail Proposals

LOCATION: Thurston, Suffolk

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

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

The highway issues identified are:

- Widening the footway under the bridge as proposed will push vehicles using Barton Road to the west. As the bridge is an arched structure this may reduce the available headroom and the increase risk of bridge strikes. If this necessitates a lowering of the existing height this will affect the of the highway by large vehicles, possibly diverting them onto other less suitable routes. It is acknowledged that reducing the road to a single lane would have the advantage 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,

Steve Merry
Transport Policy and Development Manger
Resource Management