

Public Document Pack



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| PLANNING REFERRALS COMMITTEE | |
| DATE | Wednesday, 12 July 2017 |
| PLACE | Council Chamber, Council Offices, Needham Market |
| TIME | 2.00 pm |

Please ask for: Committees@baberghmidsuffolk.gov.uk

Direct Line: 01449 724673

Email: Committees@baberghmidsuffolk.gov.uk

The Council, members of the public and the press may record/film/photograph or broadcast this meeting when the public and press are not lawfully excluded. Any member of the public who attends a meeting and objects to being filmed should advise the Committee Clerk.

A G E N D A

Page(s)

- 1 Apologies for absence/substitutions**
- 2 To receive any declarations of pecuniary or non-pecuniary interest by Members**
- 3 Declarations of Lobbying**
- 4 Declarations of Personal Site Visits**
- 5 Questions by the Public**

The Chairman to answer any questions from the public of which notice has been given no later than midday three clear working days before the day of the meeting in accordance with Committee and Sub-Committee Procedure Rule 7.

- 6 Questions by Councillors**

The Chairman to answer any questions on any matter in relation to which the Council has powers or duties which affects the District and which falls within the terms of reference of the Committee, of which due notice has been given no later than midday three clear working days before the day of the meeting in accordance with Committee and Sub-Committee Procedure Rule 8.

- 7 RF/17/1 - Schedule of Applications** 1 - 2
- a** Overview of all the Applications being presented to the Planning Referrals Committee (Pages 3 - 6)
- b** 4963/16 - Land west of Ixworth Road, Thurston (Pages 7 - 154)
- c** 5070/16 - Land at Norton Road, Thurston (Pages 155 - 316)
- d** 4386/16 - Land on the west side of Barton Road, Thurston (Pages 317 - 462)
- e** 4942/16 - Land at Meadow Lane, Thurston (Pages 463 - 592)
- f** 2797/16 - Highfield, Norton Road, Thurston (Pages 593 - 768)
- g** APPEAL ITEM 5010/16 - Land to the South of Norton Road, Thurston (Pages 769 - 884)

Notes:

1. The Council has adopted a Charter on Public Speaking at Planning Committee. A link to the Charter is provided below:

<http://baberghmidsuffolk.moderngov.co.uk/documents/s3945/Charter%20on%20Public%20Speaking%20at%20Planning%20Committee.pdf>

Those persons wishing to speak on a particular application should arrive in the Council Chamber early and make themselves known to the Officers. They will then be invited by the Chairman to speak when the relevant item is under consideration. This will be done in the following order:

- Parish Clerk or Parish Councillor representing the Council in which the application site is located
- Objectors
- Supporters
- The applicant or professional agent / representative

Public speakers in each capacity will normally be allowed 3 minutes to speak.

2. Ward Members attending meetings of Development Control Committees and Planning Referrals Committee may take the opportunity to exercise their speaking rights but are not entitled to vote on any matter which relates to his/her ward.

Members:

Councillor Matthew Hicks – Chairman – Conservative and Independent Group
Councillor Kathie Guthrie – Vice Chairman – Conservative and Independent Group

Conservative and Independent Group

Councillors: Roy Barker
Gerard Brewster
Michael Burke
David Burn
Julie Flatman
Jessica Fleming
Lavinia Hadingham
Barry Humphreys MBE
Diana Kearsley
John Levantis
Lesley Mayes
Jane Storey
David Whybrow

Liberal Democrat Group

Councillors: John Field
Wendy Marchant

Green Group

Councillors: Anne Killett
Sarah Mansel
Keith Welham

Ward Members

Ward Members who are not Committee Members have the right to speak but not to vote on issues within their Wards.

Mid Suffolk District Council

Vision

“We will work to ensure that the economy, environment and communities of Mid Suffolk continue to thrive and achieve their full potential.”

Strategic Priorities 2016 – 2020

1. Economy and Environment

Lead and shape the local economy by promoting and helping to deliver sustainable economic growth which is balanced with respect for wildlife, heritage and the natural and built environment

2. Housing

Ensure that there are enough good quality, environmentally efficient and cost effective homes with the appropriate tenures and in the right locations

3. Strong and Healthy Communities

Encourage and support individuals and communities to be self-sufficient, strong, healthy and safe

Strategic Outcomes

Housing Delivery – More of the right type of homes, of the right tenure in the right place

Business growth and increased productivity – Encourage development of employment sites and other business growth, of the right type, in the right place and encourage investment in infrastructure, skills and innovation in order to increase productivity

Community capacity building and engagement – All communities are thriving, growing, healthy, active and self-sufficient

An enabled and efficient organisation – The right people, doing the right things, in the right way, at the right time, for the right reasons

Assets and investment – Improved achievement of strategic priorities and greater income generation through use of new and existing assets ('Profit for Purpose')

Suffolk Local Code of Conduct

1. Pecuniary Interests

Does the item of Council business relate to or affect any of your/your spouse /partner's pecuniary interests?

Yes

Declare you have a pecuniary interest

Leave the room. Do not participate or vote (Unless you have a dispensation)

Breach = criminal offence

No

No interests to declare

2. Non-Pecuniary Interests

Does the item of Council business relate to or affect any of your non-pecuniary interests ?

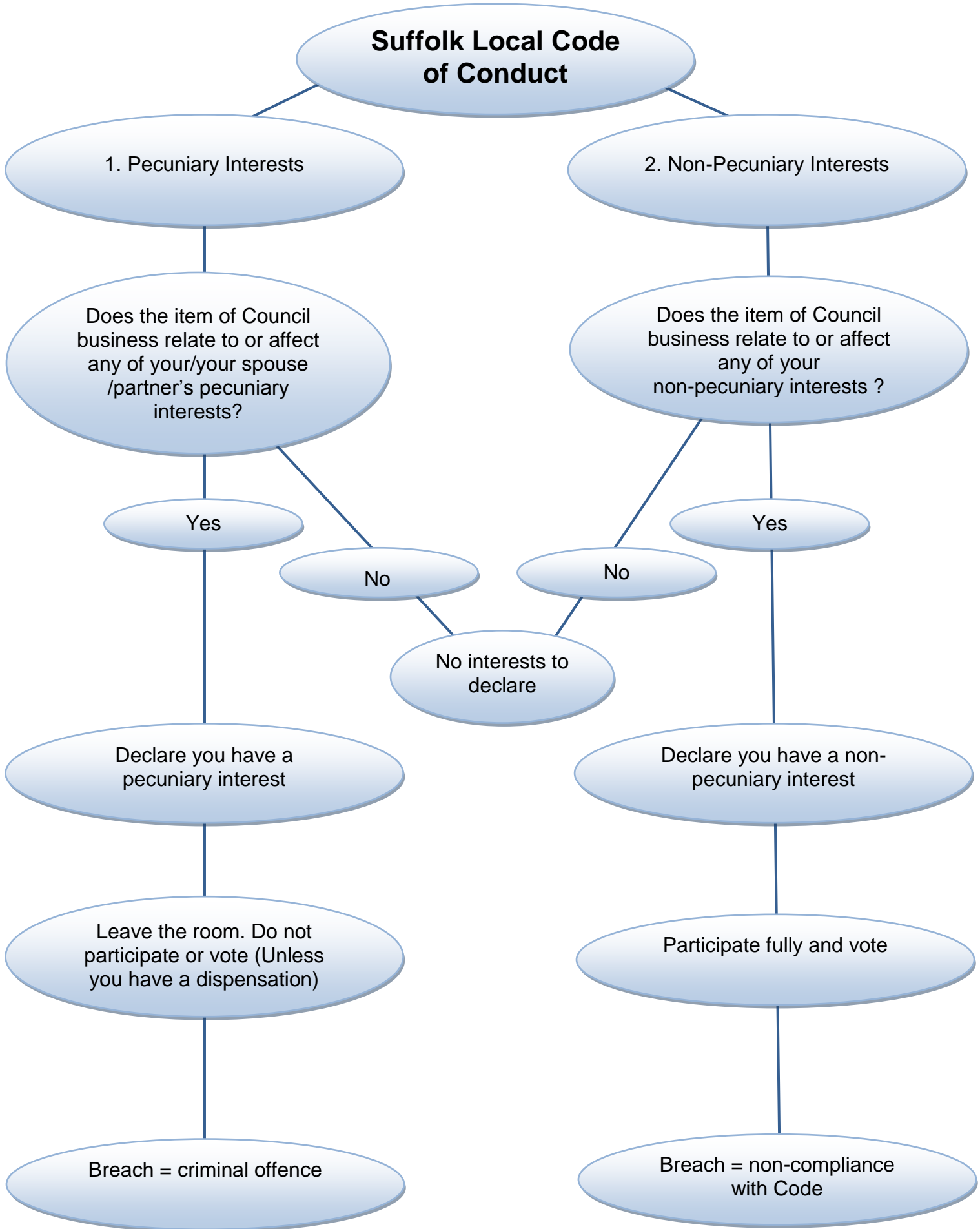
Yes

Declare you have a non-pecuniary interest

Participate fully and vote

Breach = non-compliance with Code

No



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Agenda Item 7

MID SUFFOLK DISTRICT COUNCIL

PLANNING REFERRALS COMMITTEE

SCHEDULE OF APPLICATIONS - 12 JULY 2017

| Item | Ref No. | Location And Proposal | Ward Member | Officer (Full) | Page No. |
|------|---------|---|---------------------------------|----------------|----------|
| 1. | Various | Overview of all applications being presented to Referrals | Esther Jewson and Derrick Haley | Dylan Jones | 3-6 |
| 2. | 4963/16 | <u>Land West of Ixworth Road, Thurston</u> - 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 | Esther Jewson and Derrick Haley | Dylan Jones | 7-154 |
| 3. | 5070/16 | <u>Land at Norton Road, Thurston</u> - Outline Planning Permission sought for the erection of up to 200 homes (including 9 self-build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access) | Esther Jewson and Derrick Haley | Dylan Jones | 155-316 |
| 4. | 4386/16 | <u>Land on the West Side of Barton Road, Thurston</u> - 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 | Esther Jewson and Derrick Haley | Dylan Jones | 317-462 |

| | | | | | |
|----|---------|---|---------------------------------|-------------|---------|
| 5. | 4942/16 | <u>Land at Meadow Lane, Thurston</u> - Residential development consisting of 64 dwellings and associated highway, car parking and public open space | Esther Jewson and Derrick Haley | Dylan Jones | 463-592 |
| 6. | 2797/16 | <u>Highfield, Norton Road Thurston</u> - Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane | Esther Jewson and Derrick Haley | Dylan Jones | 593-768 |

Appeal Item

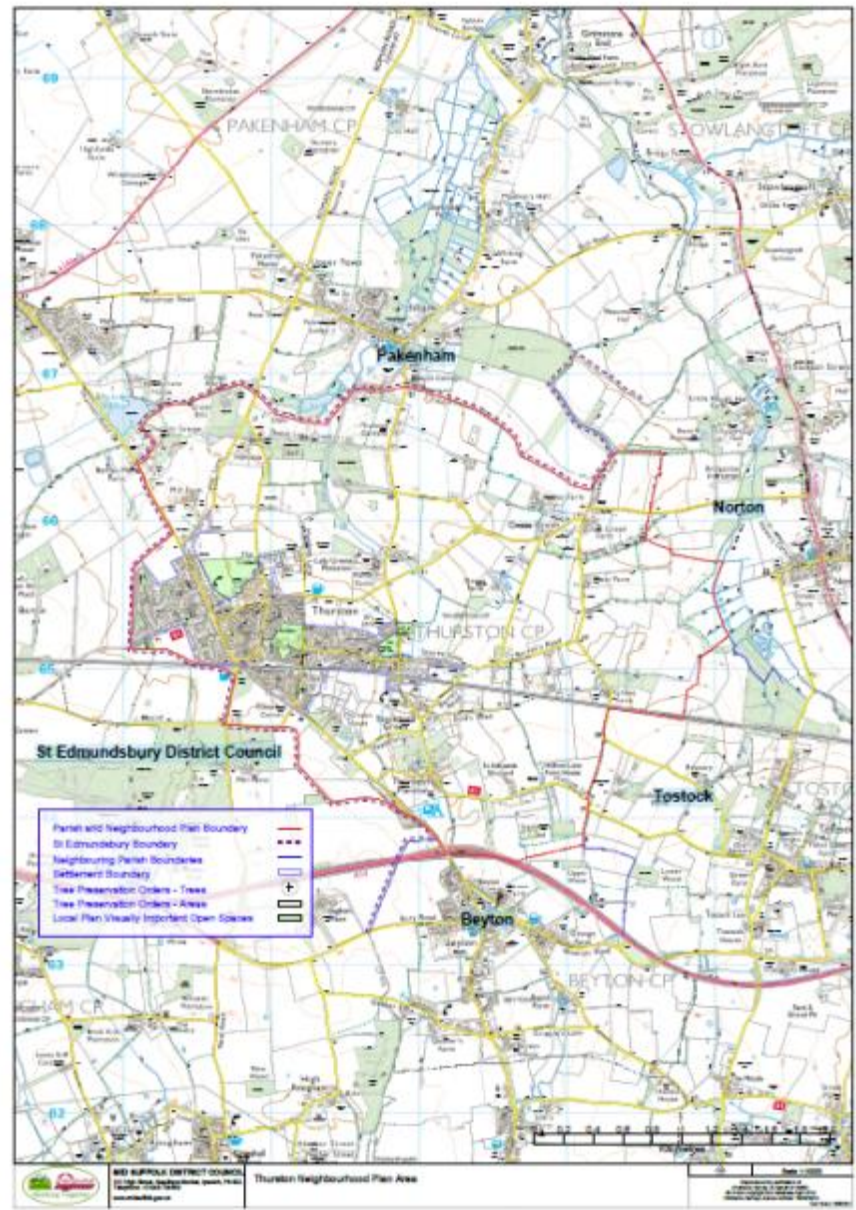
| Item | Ref No. | Location And Proposal | Ward Member | Officer (Full) | Page No. |
|-------------|----------------|---|---------------------------------|-----------------------|-----------------|
| 1. | 5010/16 | <u>Land to the South of Norton Road Thurston</u> - Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16) | Esther Jewson and Derrick Haley | Dylan Jones | 769-884 |

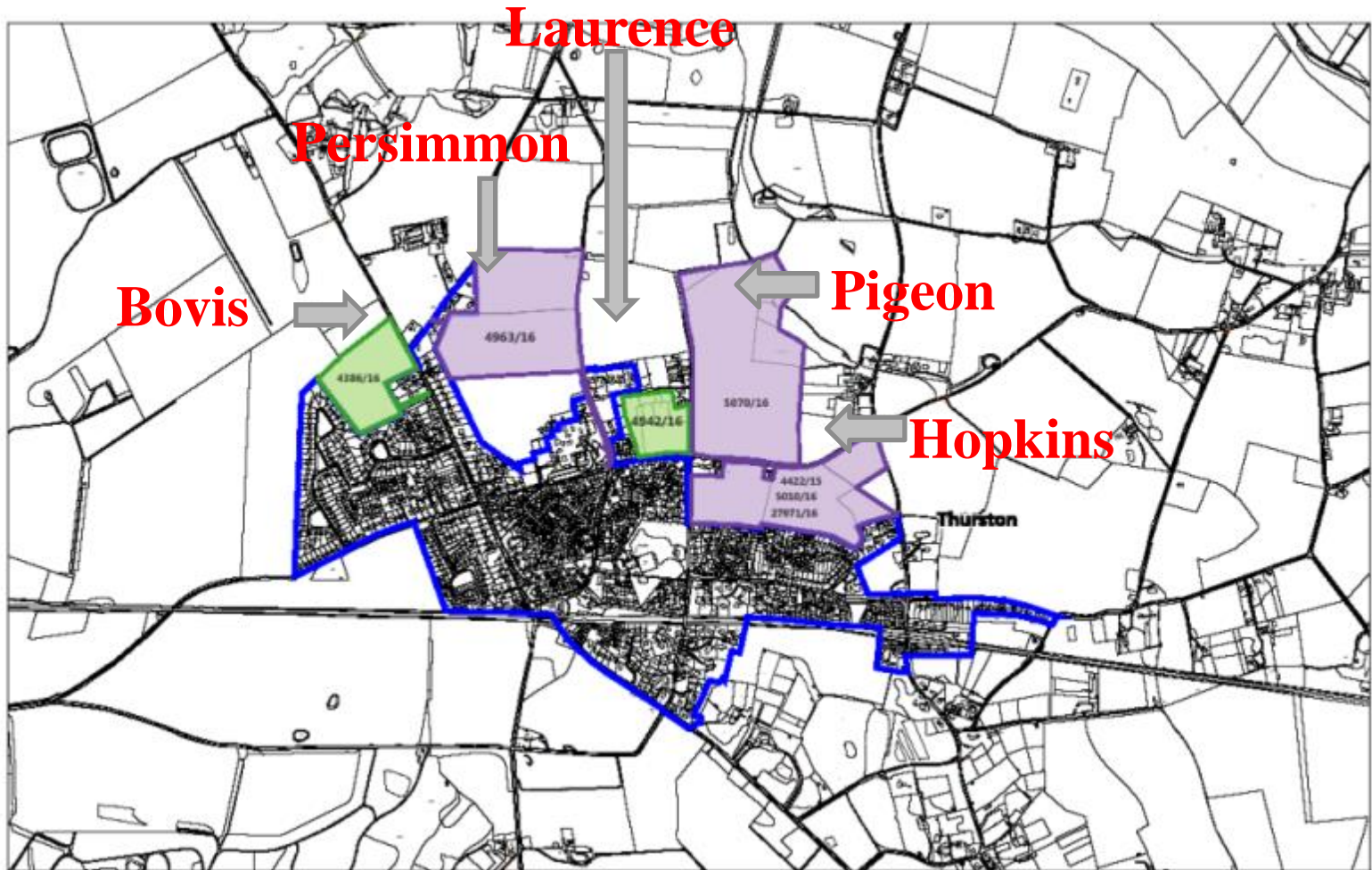
The Development Proposals

- **5 sites being promoted** through the planning application process:
 - Hopkins: 175 homes (valid: June 2016)
 - Bovis: 138 homes (valid: Oct 2016)
 - Pigeon: 200 homes + land for school (valid: Dec 2016)
 - Persimmon: 250 homes + land for primary school and land for the adjacent secondary school (valid: Dec 2016)
 - Laurence: 64 homes (valid: Dec 2016)
- **Total Proposed: 827 new homes**

Thurston







Agenda Item 7b

Committee Report

Committee Date: 12th July 2017

Item No:

Reference: 4963/16

Case Officer: Dylan Jones

Description of Development: 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: Land west of Ixworth Road, Thurston IP31 3PB

Parish: Thurston

Ward: Thurston & Hessett

Ward Member/s: Councillors Esther Jewson & Derrick Haley

Site Area: 13.6

Conservation Area: No

Listed Building: Manor Farm – Grade 2*, converted Manor Farm Barns - Grade 2, Church of St Peter Grade 2 – These are all buildings in the surrounding locality.

Received: 14/12/2016

Expiry Date: 30/06/2017

Application Type: Outline Planning Permission

Development Type: Largescale Major Dwellings

Environmental Impact Assessment: Schedule 2 development – EIA not required.

Applicant: Persimmon Homes Limited

Agent: Bidwells

DOCUMENTS SUBMITTED FOR CONSIDERATION

The defined Red Line Plan for this application is drawing number THUR-SLP01B received on the 22nd December 2016. This drawing is the red line plan that shall be referred to as the defined application site. Any other drawings approved or refused that may show any alternative red line plan separately or as part of any other submitted document have not been accepted on the basis of defining the application site.

Submitted Documents:

Sketch block plan received on 14th December 2016.

Ecological constraints and opportunities plan reference number ENO97-01 received on the 22nd December 2016.

Indicative Landscape Master Plan reference number JBA16-053 REV A received on the 22nd December 2016

Proposed footpath plan reference number OAS 16-088-TPP01 received on the 22nd December 2016.

Proposed footpath plan reference number OAS 16-088-TPP02 received on the 22nd December 2016.

Proposed footpath plan reference number OAS 16-088-TPP03 received on the 22nd December 2016.

Western boundary cross section reference number THUR received on the 22nd December 2016.

Opportunities and constraints map reference number THUR-01B received on the 22nd December 2016.

Concept block plan reference number 02 received on the 11th May 2017.

Sketch block plan reference number 03 received on the 11th May 2017.

Building height plan reference number 04 received on the 11th May 2017..

Character areas plan reference number 05 received on the 11th May 2017.

Street scene 1A drawing number Thur-Streetscene 1A received on the 22nd December 2016.

Street scene 2B drawing number Thur-Streetscene 2B received on the 22nd December 2016.

Proposed access strategy drawing number 1041 06/011F received on 6th June 2017

Proposed access strategy drawing number 1041 06/012A received on 2nd May 2017

Proposed access strategy – emergency access - drawing number 1041 06/013 received on 2nd May 2017

Transport assessment received on the 4th December 2016

Agricultural assessment received on the 22nd December 2016.

Arboricultural implications assessment received on the 22nd December 2016.

Arboricultural report received on the 22nd December 2016.

Archaeological desk based assessment received on the 22nd December 2016.

Contaminated land report received on the 22nd December 2016.

Design and access statement received on the 22nd December 2016.

Final infiltration results received on the 22nd December 2016.

Flood risk assessment received on the 22nd December 2016.

Geophysical survey received on the 22nd December 2016.

Landscape and visual assessment report received on the 22nd December 2016.

Planning statement received on the 22nd December 2016.

Preliminary ecological appraisal received on the 22nd December 2016.

Tree schedule survey received on the 22nd December 2016.

Residential travel plan received on the 22nd December 2016.

Transport assessment part 1 received on the 4th January 2017

Transport assessment part 2 received on the 18th January 2017

Flood risk assessment received on the 15th March 2017.

The application, plans and documents submitted by the Applicant can be viewed online at www.midsuffolk.gov.uk via the following link:

<http://planningpages.midsuffolk.gov.uk/online-applications/simpleSearchResults.do;jsessionid=BE8747788A80F3ECADE308F46AB6D1C3?action=firstPage>

Alternatively, a copy is available to view at the Mid Suffolk and Babergh District Council Offices.

SUMMARY

The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. The scheme is contrary to the adopted Mid Suffolk Core Strategy; however, the Council cannot demonstrate a 5 year supply of housing. As such, the scheme falls to be considered under paragraph 14 of the NPPF where the adverse impacts of the scheme have to be balanced against the benefits of the scheme to demonstrate whether it constitutes sustainable development. Officers are recommending a minded approval of this application as it is considered to be sustainable development where the significant public benefits that the scheme will deliver (contributions towards a new school, pre-school, additional land for the community college, highway improvements, health provision, affordable housing and library facilities amongst others) are considered to outweigh the negative aspects of the proposal.

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason:

- It is a “Major” application for residential land allocation for 15 or over dwellings.

PART TWO – APPLICATION BACKGROUND

1. This section details history, policies, advice provided, other legalisation and events that forms the background in terms of both material considerations and procedural background.

History

2. The planning history relevant to the application site is listed below. A detailed assessment of the planning history including any material Planning Appeals will be carried out as needed in Part Three:

There is no planning history for this site.

3. The following applications are also considered to be relevant to the consideration of this proposal as they represent the other major applications for residential development in Thurston that are currently with the Council for consideration:

2797/16 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space

areas, allotments, and vehicular access from Sandpit Lane. The applicant is Hopkins Homes and this proposal is identical to appeal 5010/16.

- 4386/16 Full planning application for the erection of 138 dwellings on land on the west side of Barton Road, Thurston. The applicant is Bovis Homes.
- 4942/16 Full planning application for the erection of 64 dwellings on land at Meadow Lane, Thurston. The applicant is Laurence Homes.
- 5010/16 Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road (This case is at appeal for non-determination in the statutory period of 13 weeks for a major application).
- 5070/16 Outline Planning Permission sought for the erection of up to 200 homes (including 9 self-build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access) on land at Norton Road, Thurston – The applicant is Pigeon Capital Management.

4. **The consideration of the cumulative infrastructure issues that this group of applications present has been explored in a collaborative, but without prejudice, working group including County and District Council Officers with the five respective applicants and their technical advisers. This has enabled a constructive and timetabled analysis of the proposals and their cumulative impact.**

Details of Previous Committee / Resolutions

5. None

Details of Member site visit

6. Members visited Thurston on the 13th June to look at this site and the four other residential development schemes that are currently with the Council for consideration.

Details of any Pre Application Advice

7. The applicant engaged with the Council and received pre-application advice on the principle of the development and its acceptability having regards to the fact that the Council does not have a 5 year supply of housing.

PART THREE – ASSESSMENT OF APPLICATION

Consultations

8. The following consultation responses have been received:

Great Barton Parish Council – Raises the following comments in relation to this scheme:

- Great Barton uses the services and facilities in Thurston and will feel the pressure on local services and facilities as a result of this development.
- Raise concerns about the impact of extra traffic at the Bunbury crossroads. This junction is already at capacity and needs work done to it to make it safe as part of this and the other schemes in Thurston.
- There is education provision in the scheme but there is no agreement or commitment by the education authority to take this forward.
- The Council needs to make sure that it gets the necessary structure under its CIL scheme, or failing that through necessary S106 agreements.

Thurston Parish Council (which includes the comments of the Thurston Neighbourhood Plan Team) – Objects to the scheme on the following grounds:

The following points which have been raised by the Neighbourhood Plans team relate to the impact of all 5 applications (and appeal) currently with the Council for residential development in Thurston:

- Thurston is to face an unprecedented level of growth due to the submission of 6 planning applications proposing over 800 houses between them.
- The 6 applications need to be considered on a cumulative basis as failure by the District Council to do so would result in the individual schemes having a significant impact on the local community and it wouldn't meet the requirements of the NPPF.
- Consider that the Neighbourhood Plan should be given some weight in the consideration of this proposal as it has been the subject of public consultation despite not allocating sites or proposing planning policies.
- The speed of the submission of the applications in Thurston and the amount of dwellings proposed between the five undetermined applications and the Granary site will result in Thurston losing its 'village feel' and for it to become 'a small dormitory town'.
- The cumulative impact of the scheme needs to be considered in the light of the 101 residences (92 dwellings and one block of flats incorporating 9 units) already granted at the Granary site.
- The current primary school is at capacity and it is landlocked and cannot be extended. Any additional houses would need additional primary school places. Agree with the County Council's stance that a new primary school is required and it should be provided before the dwellings are occupied. However, a new school causes its own infrastructure issues and there is nowhere in Thurston that has current adequate provision to assimilate the pedestrian and vehicle movements particularly at the beginning and at the end of the day in school term.
- Development is proposed on the best and most versatile agricultural land on the northern part of the village.
- The density of all of the schemes is too high and they reflect urban type development rather than what you would expect in a village.
- The local community would prefer to see schemes of no greater than 50 dwellings being built with more open space around them. They would also like to see more bungalow developments which the developers are not providing. There should also

be more one and two bedroom flats/apartments and houses in the schemes.

- Thurston is accessed by a network of A roads and country lanes which are not well maintained by the County Council and are not of a design or standard to accommodate increased growth in Thurston and also that planned in the surrounding villages and in Bury St Edmunds.
- Congestion of the local highway network already exists and these schemes will make the situation worse and will cause more accidents to occur at key sites which already experience accidents in the village.
- There are no plans by network rail to improve the station at Thurston and this will cause capacity, parking and safety issues.
- The number of dwellings proposed cumulatively will cause social impacts for the local community. These have been split in a pros and cons list as below:

| Positive | Negative |
|--|--|
| <ul style="list-style-type: none"> • New purpose built school more attuned to 21st Century needs. • Improved facilities and to allow more clubs and organisations to increase will increase their sustainability. • More residents in the locality would help to support a greater variety of leisure facilities in the village. | <ul style="list-style-type: none"> • A new school would potentially trigger more new houses in the future which would change the social dynamics of the village. • New cycle and walking routes to the new school would have to be created as they don't exist at present. • Newcomers to the village will put pressure on current organisations in the village will not be able to expand to meet this increased demand. |
| <ul style="list-style-type: none"> • A greater variety of shops and facilities would be supported. | <ul style="list-style-type: none"> • More shops and facilities will change the character of the village into a small town and local residents will resent this change and the new developments that have caused this change to happen. |
| <ul style="list-style-type: none"> • More residents will sustain bus and train services in the locality. | <ul style="list-style-type: none"> • More residents will increase pressure on the network which cannot be met unless improvements are made to the railway station car park. |
| <ul style="list-style-type: none"> • More pressure for a medical surgery. | <ul style="list-style-type: none"> • The nearest practice doesn't have capacity and all that is being asked through this and the other schemes is a contribution towards health care which will make the service unsustainable. |
| <ul style="list-style-type: none"> • Additional footpaths and cycle ways will offer a variety of routes for walkers and cyclists. | <ul style="list-style-type: none"> • The new residents using the paths will not be familiar with the way that local residents look after their valued paths and this could result in bad feeling against them. There may also be more dogs off leads which could cause problems. |

Specifically in relation to the Persimmon scheme, the Neighbourhood Plans team raise the

following points:

- The site only has one access point from Ixworth Road to serve 250 dwellings and this road is narrow and at points unsuitable to provide the main access point into the site.
- Ixworth Road has a poor line of vision for vehicles coming up towards Thurston which is dangerous and the access point into the site is in this location.
- Parking provision is poor for both primary and secondary school and this scheme will fail to alleviate that problem.
- Road safety at peak times in close proximity to the community college is an issue.
- Road safety concerns at Pokeridge Corner and accessing the A14.
- Impact of increased traffic levels on other nearby parishes.
- Location of the proposed primary school and the proximity of its entrance to the commencement of the 30mph speed limit.
- No safe crossing points for pedestrians to access this site. Acknowledge that new paths are to be put in to reach this site from the edge of the village.
- The development is inappropriate to the abutting surrounding countryside.
- Impact on health and education in the village.
- The types and densities of the dwellings proposed do not match the local needs for smaller properties and bungalows.
- The affordable homes will be too expensive for local residents as they do not cater for the need for 1 and 2 bedrooms.

Thurston Parish Council has raised the following additional comments not previously referred to above in relation to this scheme:

- Doesn't support this scheme for 250 dwellings despite a primary school being proposed.
- 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. The proposal is contrary to policy GP1, H13 and H16 of the local plan, policies FC1.1 and FC2 of the Core Strategy Focused Review and policy CS5 of the Core Strategy.
- This proposal is not sympathetic to the countryside that it will be sited in and it fails to protect the intrinsic character of the countryside by the density and mix of properties proposed.
- Wish to echo the comments made by the Ramblers in that the public footpath that runs through the site will be significantly affected by this proposal.
- The density, tenure and mix including the height of some of properties do not reflect that currently in Thurston.
- Raise highway and pedestrian safety concerns in terms of the access point into the site. Of particular concern is that only 1 access is proposed into the site and the emergency access proposed is also unacceptable as it is onto a narrow country road. Would like the fire service to be consulted on this scheme to make sure that they can get their emergency vehicles into the site through the emergency access point.
- Consider that the access point into the school should be separate and not from the single access point into the site. This arrangement will cause a conflict between users, could be dangerous and would not be sustainable.
- It is noted that the applicant states that they intend to reduce the speed limit along Norton Road to 30mph along the road frontage of the site. This cannot be guaranteed as it is a separate process carried out by the Highway Authority and is not something that can be done under the remit of this planning application.

- The site is in a remote location and this raises concerns 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.
- It is also felt that the development would not support the transition to a low carbon future and 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 considers that the development fails to demonstrate that it has considered safe and suitable access points for all people and as such is contrary to paragraph 32 of the NPPF. As the development fails to give priority to pedestrian and cycle movements and given the location of the site, it would not support the transition to a low carbon future and is therefore 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 is concerned at the impact that will be had by the location of a site for 250 houses and a 420+ pupil primary school on road safety. The Parish Council is concerned that very little assessment has been carried out on the impact of vehicular movements on Norton Road and that consideration should be given to the dangers associated with vehicular and pedestrian movements at the single entrance to the proposed primary school.
- There are drainage issues at Ixworth Road and Old Norton Road. Whilst this is acknowledged in the planning application, it is considered that no solution has been found to resolve the problems identified and large areas of hardstandings will make matters worse.

MSDC - Environmental Health – Contaminated land – Does not object to the scheme on contamination grounds subject to the imposition of planning conditions.

MSDC - Environmental Health – Public Protection – Does not object to this scheme. Points out that there are residential properties in the locality and their residents need to be protected during the construction of this scheme by a construction management plan which can be secured by a planning condition.

MSDC Heritage Officer – The site lies on agricultural land which is within the setting of Manor Farm which is Grade 2* listed and also the barn to the north of it which is Grade II listed in its own right.

The Historic Buildings Officer advises that the significance of Manor Farm is that it was designed by Philip Webb who was an influential architect and designer. He was also responsible for contemporary alterations at Nether Hall. The spacious rural setting of Manor Farm and its former farm buildings makes a positive contribution to their significance. However, Manor Farmhouse does not seem to succeed an earlier building, but is associated historically with Nether Hall to the north. As a later building, its agricultural surroundings make a less important contribution to its significance than would be the case for a traditional farmhouse. Since conversion of the barn complex, the introduction of residential development and activity in the curtilage of the barn dwellings has eroded the agricultural character of the land between them and the application site. Similarly development associated with the keeping of horses has changed the character of land belonging to Manor Farm.

The site lies on agricultural land and building on it would extend development further along Mill Lane, although in a limited degree of arc in relation to remaining farmland. In this

sense the proposal would represent some degree of harm to the setting of the listed farmhouse. However, in the light of the existing compromises to the building's setting, and the remaining extent of farmland around the farmhouse, the level of harm is considered low.

He advises in accordance with NPPF paragraphs 129, 132 and 134 that the Council in determining this proposal needs to consider whether this harm can be avoided or minimised, and whether it is justified in terms of public benefits.

As there are now 5 separate housing proposals in Thurston which together total 872 houses, with the potential for the cumulative impact of two or more of the schemes to have an impact on the heritage assets listed above, the Council's Heritage Officer has been asked for his comments. He considers that in terms of the assets listed above, that this proposal has a limited impact on Manor Farm when considered cumulatively with the other sites that are currently under consideration by the Council. He considers that the cumulative impact of the Hopkins site (2797/16 & 5010/16) and the Pigeon site (5070/16) will have the greatest effect and the cumulative impacts of these proposals are considered in the two reports for those proposals.

MSDC - Strategic Housing (Summary) – Advises that no objections are raised to the scheme as submitted as 35% affordable housing is proposed in line with the Council's requirements. The strategic Housing Officer advises that the affordable housing requirement for the site is 87 affordable units. These are broken down as follows:

Affordable Rent Tenancy = 53 units broken down as follows:

General Needs Affordable Dwellings:

- 6 x 1B 2P houses @ 58 sqm
- 6 x 1B 2P flats @ 50 sqm
- 6 x 2B 4P flats @ 70 sqm
- 4 x 2B 3P Bungalows @ 63 sqm
- 22 x 2B 4P Houses @ 79 sqm
- 7 x 3B 5P Houses @ 93 sqm
- 2 x 3B6P Houses @ 102 sqm

Total = 53

General Needs Shared Ownership dwellings:

- 4 x 2B 4P flats @ 70 sqm
- 14 x 2B 4P Houses @ 79 sqm
- 6 x 3B 5P Houses @ 93 sqm

Total = 24

Starter Home Dwellings: -

- 4 x 2B4P flats @ 70sqm
- 9 x 2B4P houses @ 76 sqm

MSDC Sustainability Officer – Initially objected to this scheme on the grounds that there is insufficient information about the environmental and sustainability measures which will be used throughout the scheme. However, the applicant has subsequently provided this information and it is considered that this has addressed the concerns raised by the Sustainability Officer.

MSDC Tree Officer – Does not object to this proposal. He comments that a small number of trees are proposed for removal and these are generally of limited amenity value and should not be considered as a constraint. Advises that tree matters such as root protection during construction can be controlled by planning conditions.

SCC Archaeology – Does not raise any objections to this scheme subject to the imposition of conditions.

SCC Flood and Water Team – Initially objected to the scheme, but following the submission of additional information from the applicant, no longer object to the application subject to the imposition of conditions dealing with flood risk matters.

The SCC Flood Management Team has been asked to comment on the cumulative impact of 827 houses being proposed in Thurston and they have commented that they would expect all of the developers to design suitable sustainable drainage systems (which they all have). All of the 5 sites are in a flood zone 1 so they comply with national policy requirements. However, surface water drainage has historically been an issue in Thurston with soil conditions not being viable for water to drain away easily. Most of the surface water from the village is drained into the foul sewer system with the east part of the village having a surface water drainage system. It is understood that Anglian Water are considering options to improve capacity in the locality to help to prevent the flood events that have happened in the centre of the village in recent years.

SCC Highways – The Highways Authority has provided two responses on this proposal. One deals with the cumulative impact of this scheme and the four others that have all been submitted in Thurston on the local highway infrastructure. The second response deals with the highway issues that are specific to this proposal.

Cumulative impact - The Transport Assessments provided for the individual proposed developments show varying degrees of impact on the highway infrastructure. To date none have shown the cumulative impact of all five developments but at some locations SCC considers this may be severe, particularly where the network is already close to or exceeding capacity. Paragraph 21 of the National Planning Policy Framework (NPPF) states that planning policies should recognise and seek to address potential barriers to investment, including any lack of infrastructure and identify priority areas for infrastructure provision. Both SCC and MSDC are aware that paragraph 32 of the NPPF states that development should only be prevented on transport grounds where residual impacts of development are severe. The same statement allows decisions to be made taking account of whether improvements can be undertaken within the transport network that cost effectively limits the significant impacts of development.

On this occasion, we consider that by taking a co-operative approach for all five developments there is an opportunity that the planning process can provide improvements to both mitigate against any severe impacts and any lack of transport infrastructure.

Highway Infrastructure (Congestion)

The initial data and modelling provided in Transport Assessments indicates that the road network will experience additional traffic through growth and development and at some locations this will exceed the theoretical junction capacity. Those junctions that are or may exceed capacity are discussed below.

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

Modelling shows that this junction is already close to theoretical capacity in the AM peak with northbound traffic waiting to turn onto the A143 queueing on Barton Road and at capacity in the PM peak with Thurston bound traffic waiting right from the A143 into Barton Road. The additional traffic from the proposed developments in Thurston will exacerbate these problems; in particular, modelling shows the queueing traffic on Barton Road will exceed capacity in the AM peak.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

Modelling indicates that the southbound approach to the junction is currently close to capacity in the morning peak and that its capacity will be exceeded before all five developments could be delivered. However, in the PM peak the junction has the capacity for the predicted traffic for all developments.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The modelling of this junction shows some inconsistencies with one study indicating it will be close to capacity southbound on Thedwastre Road in the AM peak due to traffic from one specific development but other modelling showing it would have capacity for the traffic generated by the developments.

Highway Infrastructure (Road Safety)

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

There have been three recorded crashes resulting in slight injuries and one involving serious injury at this junction in the last 5 years for which data is available (2012-2016).

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

There have been two crashes resulting in slight injuries at this junction in the past 5 years.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

At this junction there have been 9 crashes resulting in slight injuries and one resulting in a serious injury in the past 5 years.

The frequency of injury related crashes at the C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner) junction would, in the opinion of SCC, necessitates some work to improve road safety. Although the frequency of crashes at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road does not justify significant road safety improvements it is a factor that should be considered in any future mitigation measures.

Suggested Mitigation Measures

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

An assumption has been made that the junction can be signalised and that this will reduce congestion and improve road safety. Although there is a generous width of highway verge in the vicinity of the junction the geography of the site may place constraints on the design and further work is required to confirm that a solution is possible or beneficial. The proposed junction improvements would be delivered through a jointly funded S106 contribution.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

The issue of congestion on the southbound approach is difficult to mitigate as there is insufficient land within the highway boundary to provide a meaningful solution. It is noted that the road network around Thurston is relatively permeable and an option exists for traffic to avoid this by diverting onto Beyton Road and then turning right to approach this junction from the east.

Several minor traffic management features such as improved signing, marker posts and high friction surfacing have been used at this junction in the past as crash reduction measures. Despite this, crashes causing injury continue to occur. To reduce the severity of these crashes it is proposed to restrict the road to 40mph and undertake local safety improvements such as enhanced road signs and markings. This would be delivered through a jointly funded S106 contribution.

A longer term solution would be to remodel the junction or drastically remodel the road network. It is recommended these matters should be addressed in any future revisions to the Local Plan.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The highway boundary constrains any improvements in this location and thus there does not appear to be any viable mitigation to increase capacity on the southbound Thedwastre Road approach. The relatively low number of crashes suggests that the issue of road safety is not as important as it is for the other two junctions and mitigation measures would only comprise low cost work, such as road signs and markings.

Speed Limits

It is noted that a number of proposed access roads are located close to or beyond the existing 30mph speed limit in Thurston. In some cases, assumptions have been made when determining visibility for these junctions that the 85thile speed limits are or will be close to 30mph. Developers are advised that the visibility requirements shall be designed for the measured 85thile speed adjacent to the junction and not the posted or proposed future speed limit. A legal process must be followed to change or extend a speed limit and during this process objections can be made which can delay or stop creation of the necessary legal order. For this reason, Suffolk County Council cannot accept visibility splays based on changes to speed limits unless there is confidence that no significant objections to the traffic regulation order are likely.

Based on the available details of the five proposed developments the following changes to speed limits are suggested;

- Extend the 30mph speed limit north on Ixworth Road to Thurston Rugby Club
- Extend the 30mph speed limit on Norton Road towards and beyond Church Road
- Extend of 30mph speed limit on Barton Road west of Mill Lane
- Create a new 40mph speed limit between and including the C693 Thurston Road / C692 Thurston Road / C693 New Road and the C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road for road safety reasons.

The necessary Traffic Regulation Orders (TRO) could be raised individually or preferably as a single order. The latter is preferred as it reduces cost and administration. This can be delivered through site specific or joint S106 contributions. As stated above implementation of an order cannot be guaranteed and if a TRO is required to justify reduced visibility splay lengths then the order would need to be substantially complete before such a reduction would be accepted. If a process can be agreed between the parties' initial consultation can be undertaken in advance of determination of the planning applications.

Pedestrian and Cycling Infrastructure

The benefit of considering all five applications together is that a coherent system of footways and pedestrian crossings can be delivered in Thurston. The proposed footways are intended to provide good, direct pedestrian access both to the main village and schools. The proposed improvements, most of which have already been proposed by

individual applications, are listed below:

- An uncontrolled pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road.
- A footway on west side of Ixworth Road between Norton Road and the entrance to Persimmon's site
- A footway link on Ixworth Road between the entrance to the Persimmon development and the entrance to the Thurston Rugby Club.
- A controlled pedestrian crossing facility (e.g. a raised table junction with zebra crossing) if practicable at or adjacent to the Norton Road / Station Hill / Ixworth Road junction. Pooled contributions from all 5 developments are required for the County Council to deliver this.
- A footway on the north side of Norton Road from Meadow Lane east towards Church Lane as far as the site boundary allows. This could be within the development and or on the highway verge.
- An uncontrolled pedestrian crossing on Norton Road linking the Hopkins Homes and Pigeon sites
- Meadow Lane resurfaced to improve cycle / pedestrian facilities (and maintain access to properties)
- Provide a metalled footway on Church Road between Footpath 006 and the footpath link to School Lane. This will include provision of street lighting along this short section of footpath.
- Provide two uncontrolled pedestrian crossings on Sandpit Lane to link the Hopkins Homes development to the main village

With the exception of the pedestrian crossing facility at the junction of Ixworth Road, Station Hill and Norton Road, the above are expected to be secured by conditions or S106 obligations as appropriate and delivered by the relevant development with S278 (improvements to existing highway) or S38 agreements (if adoption as highway maintainable at public expense is desired) as appropriate. All the footways are expected to be metalled and where verge space allows provision for cyclists should also be considered.

Public Rights of Way (PRoW)

It is proposed that a small number of PRoW are improved to provide alternative pedestrian links between the proposed developments and current and future school sites. These are improvements to:

- Thurston Footpath 001 between Ixworth Road and Meadow Lane. It is proposed that this is to an all-weather standard, preferably a bituminous surface.
- Thurston Footpath 018 between Ixworth Road and Mill Lane. This lies within the development site and the works can be secured by condition.
- Thurston Footpath 006 between Norton Road and Church Road. This lies within the development site and the works can be secured by condition. It is proposed that this is to an all-weather standard; preferably a bituminous surface as far as it is a safe pedestrian route to the site north of Norton Road
- New PROW link along southern boundary of the Bovis Homes site to join Barton Road
- New PROW link from the site west of Barton Road to Heath Road, linking with Cycle Route 51.
- Improve PROW 007 North of Meadow Lane (un-metalled).

If diversion of a PRoW is likely it is recommended that discussions are held with the

relevant SCC officer at an early state.

Public Transport

Improvements to public transport infrastructure will be limited to any site-specific works necessary as a result of each development through S106. All other public transport improvements are included in the CIL.

The specific highway comments relating to this scheme only are as follows:

Speed limit – The developer is proposing to reduce the speed limit to 30mph limit from its existing position down to the Rugby Club. However, this change cannot be guaranteed as it is a separate legal process under the highway act and as such, the scheme needs to be designed to the current speed limit of the road.

Emergency access – This is considered to be acceptable via Mill Lane provided the following occurs:

- The length of the main access between Ixworth Road and the beginning of the loop road is kept to a minimum.
- Details of the junction layout including swept path analysis show that this access is practical with regard to the narrow width of Mill lane.
- The emergency access is designed to be of a suitable width with features to effectively deter use by non-authorized vehicles while allowing pedestrian and cycle use.

Internal Highway layout – A carriageway width of 5.5m would be acceptable for the main access road. Details of the footway layout and shared space design will be required.

Car parking - To be agreed at Reserved Matters stage having regards to the Council's standards.

Footway and cycle connectivity - The proposal of a footway along the western side of Ixworth Road between Norton Road and the Rugby Club is welcomed. However, the provision of a footway must not reduce the carriageway width on Ixworth Road to an unacceptable width.

To improve pedestrian connectivity a pedestrian crossing should be provided at the junction of Ixworth Road, Station Hill and Norton Road.

An uncontrolled crossing to should be provided to link the new footway alongside Ixworth Road to the PRow Thurston 001 opposite.

The proposed footway as detailed includes provision of root barriers and 'no dig' construction. These are regarded as indicative and details will be agreed as part of the S278 approval process.

Public Rights of Way (PRow) – Changes 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. Some of the footways shown on drawing 03 Sketch Block Plan are within the existing or proposed adoptable highway and as such do not require PRow status.

Road Safety - The Transport Assessment does not refer to the cluster of crashed at the junction of C693 Thurston Road / C692 Thurston Road / C693 New Road. However, this

has been addressed in the letter regarding the cumulative effects of the developments in Thurston.

Landscaping - When considering the masterplan for full planning application the developer should note the Highway Authority's preference for trees to be planted in public open space rather than adjacent to adoptable highways (including footways).

Transport Assessment and Local Highway Infrastructure

The trip rates calculated for this development are 0.568 (am peak) and 0.528 (pm peak). These are lower than adjacent developments in Thurston and surrounding villages but considered acceptable due to the proportion of affordable houses.

The TA does not address cumulative impact of other sites and does not include A143 Gt Barton and C693 Thurston Road / C692 Thurston Road / C693 New Road junction, which have been identified in other Transport Assessments as junctions that will receive additional traffic from this development and will then exceed theoretical capacity.

Proposed S278 works

- Footway on west side between Norton Road and Persimmon site and beyond to the Thurston Rugby Club

Proposed S106 Heads of Terms

- 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.
- 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.
- 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.
- 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.
- Extension of the 30mph speed limit to Thurston Rugby Club. A contribution of £8000 is required on commencement of work on site.
- 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.
- 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 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.

Advises that the remainder of the issues that are relevant to this proposal can be covered by planning conditions and within the S106 agreement for the scheme. The County has indicated that the cost of this will be £176,877 for the works required under S106 of the act (excluding costs for the travel plan which are shown separately above) and £130,000 for works under section 278 of the Highways Act.

SCC - Obligations Manager: Comments that 250 new houses proposed in the scheme will have an impact on local infrastructure particularly in terms of education.

Primary Provision

The residents of the scheme will generate the need for 62 new primary school places and it has been advised that there is no capacity in the local Primary School which is the Thurston Church of England Primary Academy to accommodate this development and as such a contribution is requested towards a new primary school. As new schools cannot be provided through the Council’s CIL scheme (the 123 list only allows for extensions to schools and not new schools) a request is made for a contribution towards a new school under S106 of the planning act.

A contribution for £1,018,598 as broken down below is require to meet education needs which will arise from this development:

| School level | Minimum pupil yield: | Required: | Cost per place £ (2016/17): |
|----------------------------------|----------------------|-----------|-----------------------------|
| Primary school age range, 5-11*: | 62 | 62 | 16,429 |

Land for new school

A contribution for a further £80,228 is also requested to contribute towards the cost of the land to provide the school. This is worked out on a maximum cost of £100,000 per acre (£247,100 per hectare, which will be £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 62 places x £1,294 per place = **£80,228**

Temporary classroom

The Obligations Manager has also advised that there will be a need for temporary classroom arrangements to accommodate the needs of the children that arise from this development. The existing primary school is on a very constrained site and an extension to the facility is not possible under Department for Education guidelines. However, it is advised that where extra pupils either through a spike in local population or from housing development cause a ‘bulge’ in the admission numbers, this can be accommodated by providing temporary classrooms.

A double temporary mobile classroom providing 60 places could be located within the hard surfaced play and car park areas within the school for a period of no longer than 3 years to meet the admissions ‘bulge’ which would be caused by this and other large housing developments in Thurston. As the primary school is an academy whereby the County Council has limited control over its operation, agreement to the provision of the temporary building has had to be sought from the Academy board that runs the school and it is understood from the Obligations Manager, that agreement has now

been given by them for this to go ahead.

The temporary classroom will be facilitated via a CIL bid as it is classified as being an extension to an existing school in the Council's 123 list.

Secondary School and 6th form provision

The Obligations Manager has commented that secondary and 6th form provision in the area is currently sufficient to accommodate the additional pupils which will be generated from this proposal as shown in the table below.

Total primary education contributions: £1,098,826

Restriction on occupation

The Obligations Manager has also commented that as there is another application in Thurston that is proposing a primary school site (application 5070/16 – Land on land at Norton Road, Thurston for Pigeon Capital) but neither this or that application is approved yet, that the district council should consider imposing a planning condition restricting occupation of any dwellings once the capacity of the existing primary school with additional temporary classroom are full. This condition could then be discharged once the construction of the new primary school on whichever site has been chosen has commenced.

Pre-school

The Obligations Manager has also noted that there are currently 4 pre-school establishments in the locality (2 childminders, Thurston pre-school and Tinkerbells Day Nursery) and that spare capacity between them is only 10 spaces. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution for this scheme would be based on 25 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 250 dwellings there is the need for 25 additional places
- Therefore 25 pupils x £8,333 per place = **£208,325 (2016/17 costs)**

Total contribution for all education provision - £1,307,151

Other infrastructure contributions

Requests a contribution of £54,000 towards library provision. This is requested under the Council's CIL 123 list.

SCC Public Rights of Way – Notes that public footpath number 18 runs through the site, but they do not raise any objections to this scheme subject to the imposition of a condition to ensure that foliage along the site is cut back so that it stays at its legal width of 1m.

Anglian Water – They have been consulted but have not responded to this proposal.

Ecology Officer, Essex Place Services— The Council's Ecologist originally objected to the scheme on the basis that the site could support Skylarks which are a UK and European Priority Species and that there was insufficient information in the applicant's ecological report to assess and mitigate against the loss of habitat. Following additional discussions with the Ecologist, the applicant has now agreed to provide Skylark nesting plots on land within their ownership (and included as a blue line in the site location plan for this application) and the Ecologist has now withdrawn their objection to the scheme . She is now satisfied that all matters can be satisfactorily controlled by conditions. __

Environment Agency – Does not object to this scheme on flood risk or on foul water grounds.

They have also considered the cumulative impact of all 5 schemes together and they advise that none of the sites are in an area at risk of fluvial flooding. They also confirm that from their records there will be sufficient capacity in the Thurston Water Recycling Centre to accommodate all 827 dwellings. They have advised that Thurston lies in an area of 'water supply stress' by Anglian Water which has a duty under their own legislation to provide a water supply to new houses when they are built.

Fire Service - County Fire Officer – They have been consulted but have not responded to this proposal.

Highways England: Does not raise any objection in relation to this proposal.

Historic England – They do not wish to make any comments on this scheme.

Landscape Officer – Essex Place Services: Does not object to the proposal but comments that it will significantly change the visual character of the site which will change from agriculture to residential and that it will take a number of years for the landscaping as suggested to screen the site to develop and grow.

In their response they provide key details which the applicant will need to explore should this scheme be approved in formulating their layout for their reserved matters application.

Natural England – They do not have any comments to make on this proposal.

Network Rail – They have been consulted on the cumulative impact of building 827 new dwellings in Thurston on the railway station and the local railway network as requested by the local community. They state that the main issue is the Barrow Level Crossing at Thurston station which has historically seen a number of safety issues associated with it and the level of usage which would arise from the erection of the number of dwellings proposed would have a severe impact on safety unless mitigation measures are introduced. They indicate that their preferred option is to close the level crossing and replace it with a new pedestrian ramp from platform 1 (upside) down the embankment leading onto Beyton Road. This design will also need to include a drop off point/layby for vehicles along Beyton Road. They have advised that the cost of the works amount to £1million and should be shared proportionally amongst the developers. They are seeking this through a S106 agreement.

When questioned, Network Rail has made it clear that the works that they propose to the crossing point at Thurston Station are directly related to the impact of the 5 planning applications and the 827 houses that would be built. They have advised that the other works that they propose to close crossing points elsewhere on the same line are minor in nature and cannot be compared to this site as the other crossing points are not facing

unprecedented levels of pedestrian use which would be generated from the proposed housing in Thurston.

NHS/Primary Care Trust – The proposal will have an impact on the Woolpit Surgery and there will be a need to either extend or reconfigure the building to meet the additional capacity requirements that will be generated if this proposal is approved. The PCT have not specified an amount that they require, but they have confirmed that they will be making a bid under the Council's CIL scheme for the funding that they require to carry out the works they deem necessary to ensure that the facilities can meet the need that arises from this development.

Ramblers Association – Objects to this scheme as the public right of way that links Ixworth Road to the east and Mill Lane to the west across the site and to the site will be adversely affected by loss of open space and amenity currently enjoyed by local walkers and residents. This development will alter the character of the north side of the village and diminish the enjoyment of a walk in the countryside. Also states that the character of Ixworth Road will change from a rural highway to a busy urban character and this is likely to make it dangerous for walkers to cross the road safely. They have also stated that they are concerned at the closure of the public footpath during the build process for the scheme and also would not be happy if the footpath was to be diverted away from its existing route.

Suffolk Wildlife Trust – Raise the following points:

- Note the comments of the ecologist who surveyed the site but whilst no evidence of Skylarks was found on site it was early in the season when the survey was done. It is considered that this site would be suitable for Skylark habitat and a compensation scheme needs to be provided with this proposal as Skylarks are a UK and Suffolk Priority Species.
- It is also noted that a sympathetic lighting scheme should be provided at the site to mitigate its impact on ecology in the area.
- Query how the landscaped and Suds areas will be maintained in the interest of protecting and improving ecology in the area.
- If approved, there needs to be a condition on the planning permission to ensure that the scheme is developed in accordance with the recommendations of the ecological report.
- The scheme should also provide environmental/ecological enhancements.

Representations

9. 25 letters in total have been received objecting to this proposal on the following grounds:

Highway safety

- The proposed cycle way and footpath does not extend to the full extent of the site. It should do.
- The road approaching the school should be widened with parking facilities on it to address potential future traffic issues.
- The applicant's transport statement makes unrealistic assumptions about how traffic will flow into and out of this site.
- There needs to be a combined traffic management plan for the area to accommodate the needs of all development in Thurston.
- The crash data for Fishwick Corner as submitted by the applicant does not seem to be correct. More accidents than is listed in the report have been

witnessed on site by local people.

- The additional land proposed for the College is of concern as this is likely to in the future facilitate an extension to the school which will further increase congestion and traffic issues in the locality.
- The local roads are inadequate and dangerous to cope with so many new dwellings and they are always in a poor state of repair which will be made worse by this proposal.
- There are a number of dangerous junctions and pinch points in the area which will become more dangerous with the number of vehicles which will be generated by this development.
- Additional vehicles on the road network will cause congestion and chaos at peak times.
- The railway station has poor parking. Additional residents from this site using the railway station to access places such as Bury St Edmunds will increase the parking issues experienced.
- Increased users of the railway line will result in more users having to walk across the railway tracks to access trains. These lines are shared with fast moving and non-stopping express and freight trains. This is unsafe and there will be accidents and possible fatalities.
- There is no turning head or anything shown for buses or cars using the new school to turn around on so traffic twice a day will be parked on the highway which is not wide enough to accommodate it.
- Drainage of water on Ixworth road is a problem and this scheme will make the situation worse.
- The applicant's trip generation figures aren't believable and traffic impact will be greater than suggested.
- There is poor visibility from Cedars Close. The additional volume of traffic on the highway will make the situation worse.
- Saw a traffic survey being carried out earlier this year in Thurston. This proposal must be considered having regards to its findings. Any future traffic surveys should be done at peak times during the day to be accurate.

Infrastructure

- This proposal will have a negative impact on water pressure in the locality.
- The infrastructure for this proposal is limited and as such it should be refused planning permission.
- This development will create excessive pressure on the local GP surgery as well as other NHS infrastructure in this part of Suffolk.
- If this is approved, a supermarket will be needed locally to meet the needs of the residents.
- The local primary school cannot accommodate the children from this development. If this is approved, what is going to happen if the houses are built before the new school and how is the existing school supposed to cope in that situation? Would children need to be bused to other schools in the locality?

Impact on the character and amenity of the area

- People use the public right of way regularly to enjoy peace, open air and views. This scheme will destroy that as the path will become an urban route right next to the new houses.
- The proposal is urban in character and will have a negative impact on the surrounding open countryside.
- Increasing the width and 'urbanising' Ixworth Road to provide access into the

site is unacceptable and will have a harmful impact on the rural setting of this part of Thurston.

- Would like to see more landscaping if this scheme is approved.
- This proposal does not maintain or enhance the amenity of the area as the Council's local plan requires schemes to do.

Impact on residential amenity

- The dwellings will be too close to existing properties. We enjoy an area of tranquillity undisturbed by noise to the rear of us and a separation distance of 20 – 30m between us and the new dwellings will completely destroy this.
- Our property is on a slope and having a two storey house facing us will impact negatively on our privacy.
- The proposed buffer zone will impact on the amount of light received by some of the existing properties adjacent which will affect the amenities of the occupiers.

Impact on wildlife in the locality

- It says in the applicant's documentation that the proposal will result in the existing landscape quality of the area being retained. How can this be when a green field is being built on?
- The hedge between the college and the land earmarked for the college is a major feeding area for bats and should not be removed without substantial consideration.

Policy issues

- The development is outside the settlement limits for Thurston and that part is being glossed over by the applicant.
- This proposal ignores the 50 limit per housing site as suggested by the Parish Council in their neighbourhood plan.
- This proposal is not sustainable as it will provide dwellings for people commuting to Ipswich or towards Cambridge.
- When will Mid Suffolk tell us the maximum number of new houses Thurston should take in the new Local Plan for the district?
- This proposal should not go ahead until the Council works collaboratively with the local community and prepares its new local plan for the district and the new Neighbourhood plan is issued.

Other issues

- This proposal is not sustainable.
- There are not enough bungalows as part of this scheme.
- If the scheme is approved, it is important that the housing numbers are reduced, with no units near the western boundary of the site, or if these are essential then they must be single storey properties. There also needs to be an improved buffer zone on the northern boundary of the site and an improvement to the connectivity between the lagoon/open space area and the northern end of the site.
- The developer has ignored the local need for more bungalows in his proposal.
- The field which is the subject of this proposal has been used to grow crops over the years. It is designated as Grade 2 agricultural land and has significant economic benefit for food production in Suffolk. This proposal is therefore

contrary to the requirements of the NPPF.

- There are other sites in the village that should come first before this one does.
- Significant weight should not be put on the fact that the applicant is proposing a new school and land for the primary school when considering this proposal as the negatives of the scheme outweigh the positives.
- If the school and land for the college was taken out, would this proposal then stand on its merits?
- The energy efficiency merits of this scheme need to be excellent to make them sustainable.
- This proposal will make Thurston a town and not the current village that it is.

Cumulative Impacts

- The 5 sites in Thurston should be considered cumulatively and not singularly due to their linked impacts and they should also be considered having regards to the Granary site which already has permission.
- There are too many houses proposed particularly when you take into account all of those in Bury St Edmunds which is only a short distance away from Thurston.

Following the submission of revised plans in May 2017, further letters from two of the original objectors have been received. They state that they continue to object to this scheme on the following grounds:

- We do not understand what the significance is of the changes that the applicant has made to the application plan. It does not address any of our previous objections to this scheme.
- We want to see bungalows along the whole length of the western boundary.
- A significant buffer zone is needed along the western boundary.
- There is a need for more 2 bedroom houses and bungalows on site.
- This scheme should be rejected unless the number of houses and the density of the development can be reduced.

The Site and Surroundings

10. The application site lies in the village of Thurston which has a population of approximately 3200 people (2011 census). The site extends to an area of 13.7 hectares of grade 2 agricultural land which is generally flat but falls away gently towards its northern point and towards the dwellings that lie on Barton Road and Mill Lane. Ixworth Road is a typical country road without pavements and street lighting as it extends out into the countryside. Barton Road to the west of the site is bordered by existing residential properties, with Mill Lane which directly borders the site being a narrow country lane with limited and low density residential development on it.
11. As the site is currently in agricultural use, tree cover is limited to sporadic trees on the Ixworth Road boundary, dense hedging between the site and the school playing fields of the College, and a line of sporadic trees between the site and the properties on Barton Road. The tree/hedge cover becomes denser between the site and Mill Lane, but it does not completely screen it.
12. Adjacent to the most northern part of the site in the east lies the Thurston Rugby club, but otherwise the land is open countryside characterised by agricultural practices. A public footpath also crosses the field running west/east directly through the middle of the site.

13. Directly to the south of the site lies the school playing fields belonging to the college and this parcel of land is designated as a visually important open space in the Mid Suffolk Local Plan. The settlement boundary for Thurston runs between the school playing field and the designated land and, as such, this proposal does not abut the settlement boundary for Thurston and remains as countryside for planning purposes.

The Proposal

14. Please note details of the proposed development including plans and application documents can be found online.
15. Proposed is an outline planning application for the erection of up to 250 dwellings, open space and infrastructure up to 4.4ha of land for education uses for Thurston Community College and a new primary school site. Details of access is included with this proposal with all other matters reserved for future consideration if this scheme is approved
16. The applicant has submitted an indicative masterplan with the proposal showing a single access point from Ixworth Road into the site and a suggested layout utilising a single spine road through the site, with various secondary streets leading through to the dwellings.
17. The layout shows a separate access point off Ixworth Road into the land set aside for education purposes which will lie on the south east corner of the site. The school land can also be reached from a link within the site. To the west lies a drainage lagoon which will be landscaped and enhanced to provide part of the public realm for the scheme. The public footpath running from Mill Lane to Ixworth Road crosses the site above the lagoon and runs on its current line through the site. Directly on the southern part of the site, and to the north of the existing college playing fields, a parcel of land will be provided to the college to purchase to allow it to improve its facilities on site should it wish to do so.
18. The indicative layout for the site shows substantial landscaping along the southern boundary and significantly increased landscaping/tree planting along the Mill Lane and Ixworth Road frontages compared to what exists at present. A band of trees is proposed along the northern boundary of the site to help to soften the impact of the scheme on the surrounding open countryside. The layout provides an indicative density of 31 dwellings per hectare (this figures excludes the 4.4ha set aside for education purposes and the land for the drainage lagoon).

NATIONAL PLANNING POLICY FRAMEWORK

19. The National Planning Policy Framework (NPPF) contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.
20. The following parts of the NPPF are considered to be applicable to this scheme:
 - Para 6: Achieving sustainable development
 - Para 7: Three dimensions to sustainable development
 - Para 11 – 15: The presumption in favour of sustainable development

Para 17: Core planning principles
 Para 32 and 34: Transport movements
 Para 47: Delivering a wide choice of high quality homes (including the need to have a 5 year deliverable supply of housing)
 Para 49: All housing proposals should be considered in the context of the presumption in favour of sustainable development.
 Para 55: To promote sustainable development in rural areas.
 Para 56 & 60: Requiring good design
 Para 64: Development of poor design must not be supported.
 Para 69: Promoting healthy communities
 Para 70: Delivery of social, recreational and cultural facilities that the community needs.
 Para 72: Provision of school places.
 Para 73: Access to high quality open space.
 Para 75: Protection and enhancement of public rights of way.
 Para 100: Development and flood risk
 Para 103: Development and increasing flood risk elsewhere
 Para 109: Planning system should contribute to and enhance the natural and local environment.
 Para 112 & 117–119: Development affecting protected wildlife
 Para 123: Planning and noise.
 Para 125: Planning and darker skies.
 Paras 128 & 129: Describing the significance of a designated heritage asset.
 Para 131: Determining planning applications that affect heritage assets.
 Para 132: Significance of heritage assets.
 Para 134: Development and less than substantial harm
 Para 186: Approaching decision taking in a positive way.
 Para 187: Local Planning Authorities should find solutions rather than problems in decision taking.
 Para 196: Plan led planning system.
 Para 197: Assessing and determining application applying the presumption in favour of sustainable development.
 Paras 203 -206 – Planning conditions and obligations.
 Paras 211 - 212: Using development plans and the NPPF in decision making.
 Paras 214 – 215: The weight attached to development plan policies having regards to their consistency with the NPPF.
 Para 216 – Weight given to policies in emerging plans

CORE STRATEGY

21. Core Strategy Focused Review
 - FC1 – Presumption in favour of sustainable development.
 - FC1.1 – Mid Suffolk’s approach to delivering sustainable development
 - FC2 – Provision and distribution of housing.

22. Core Strategy
 - CS1 – Settlement hierarchy
 - CS2 – Development in the countryside & countryside villages
 - CS4 – Adapting to climate change.
 - CS5 – Mid Suffolk’s environment
 - CS6 – Services and infrastructure
 - CS9 – Density and mix

NEIGHBOURHOOD PLAN / SUPPLEMENTARY PLANNING DOCUMENTS /AREA

ACTION PLAN

23. In 2013 Thurston received a neighbourhood plan designation and the settlement is currently working on its new neighbourhood plan. The plan is, however, at an early stage and as yet does not have any policies which could be used in the assessment and consideration of this proposal

SAVED POLICIES IN THE LOCAL PLAN

- GP1 – Design and layout of new developments
- HB1 – Protection of historic buildings
- HB13 – Protecting ancient monuments
- HB14 – Ensuring that Archaeological remains are not destroyed
- H3 – Housing developments in villages
- H13 – Design and layout of development
- H15 – Development to reflect local characteristics.
- H16 – Protecting existing residential amenity
- H17 – Keeping new development away from pollution
- CL8 – Protecting wildlife
- CL11 – Retaining high quality agricultural land
- T9 – Parking standards
- T10 – Highway consideration in developments
- RT4 – Amenity open space and play areas within residential development
- RT12 – Footpaths and bridleways
- SB3 – Retaining visually import landscapes (with the land to the south of this site between it and the college being designated)

Main Considerations

24. From an assessment of relevant planning policy and guidance, representations received, the planning designations and other material issues the main planning considerations considered relevant to this case are set out including the reason/s for the decision, any alternative options considered and rejected. Where a decision is taken under a specific express authorisation, the names of any Member of the Council or local government body who has declared a conflict of interest are recorded.
25. The following are identified as the main considerations in assessing this application:

The Principle Of Development

26. The National Planning Policy Framework (NPPF) requires Councils to identify and update, on an annual basis, a supply of specific deliverable sites sufficient to provide for five years' worth of housing provision against identified requirements (paragraph 47). For sites to be considered deliverable they have to be available, suitable, achievable and viable.
27. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites (as stated in paragraph 49 of the NPPF). Where policies cannot be considered up-to-date, the NPPF (paragraph 14) cites the presumption in favour of sustainable development and states that planning permission should be granted unless i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or ii) specific policies in the NPPF indicate development should be restricted. The

presumption in paragraph 14 also applies where a proposal is in accordance with the development plan, where it should be granted without delay (unless material considerations indicate otherwise).

28. The precise meaning of 'relevant policies for the supply of housing' has been the subject of much case law, with inconsistent results. However last month, the Supreme Court gave judgment in a case involving Suffolk Coastal District Council which has clarified the position. The Supreme Court overruled earlier decisions of the High Court and the Court of appeal in this and other cases, ruling that a "narrow" interpretation of this expression is correct; i.e. it means policies identifying the numbers and location of housing, rather than the "wider" definition which adds policies which have the indirect effect of inhibiting the supply of housing, for example, countryside protection policies. However, the Supreme Court made it clear that the argument over the meaning of this expression is not the real issue. The absence of a five year housing land supply triggers the application of paragraph 14 of the NPPF. In applying the 'tilted balance' required by this paragraph, the Council must decide what weight to attach to all of the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies.
29. In accordance with National Planning Policy Guidance paragraph 030 (Reference ID: 3-030-20140306) the starting point for calculating the 5 year land supply should be the housing requirement figures in up-to-date adopted Local Plans. It goes on to state that '*...considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light....Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints...*'
30. The Council published the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA) in May 2017 which is significant new evidence for the emerging Babergh and Mid Suffolk Joint Local Plan. Therefore, the 5 year land supply has been calculated for both the adopted Core Strategy based figures and the new SHMA based figures. For determining relevant planning applications, it will be for the decision taker to consider appropriate weight to be given to these assessments and the relevant policies of the development plan.
31. A summary of the MSDC 5 year land supply position is:
 - Core Strategy based supply for 2017 to 2022 = 3.9 years
 - SHMA based supply for 2017 to 2022 = 3.9 years
32. The NPPF requires that development be sustainable, and paragraph 6 of the NPPF sets out guidance on what this means in practice by drawing attention to all of the policies from paragraph 18 to 219 of the NPPF. In some circumstances there is also a presumption in favour of sustainable development which is to be applied as set out in paragraph 14 of the NPPF. This has been discussed above.
33. Paragraph 7 of the NPPF sets out three dimensions for sustainable development, economic, social and environmental:

"an economic role - contributing to building a strong, responsive and competitive

economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure:

a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."

34. In light of all of the above, this report will consider the proposal against the policies of the development plan to determine if the development is in accordance with the development plan as a whole. If it is not, and there are policy conflicts, they will need to be weighed against other material considerations to see whether a decision which does not accord with the development plan is warranted, in the light of the presumption in favour of sustainable development, and in the context of the authority not being able to demonstrate a 5 year land supply.

Sustainability of the Proposal (including assessment against the development plan and the NPPF)

35. The NPPF provides (para 187) that *"Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."*
36. The Parish Council and some of the objectors have commented that this scheme should be refused as this proposal is outside and does not even abut the development limits for Thurston, in line with the policies contained in the adopted Core Strategy and Local Plan. Further, comments also suggest that housing numbers should be limited in Thurston. However, it is clear on reviewing the guidance in the NPPF that, as the Council does not have a five year supply of housing land, the housing delivery policies CS1 and CS2 of the core strategy, along with policy H7 of the Local Plan, should not be considered to be up-to-date. In this respect, refusing the application solely on the basis of the development being outside the development limits of Thurston, or seeking to cap the development that can be considered, would not sit comfortably with the requirements of the NPPF that look to consider the sustainability of the development in relation to the environmental, social and economic strands of sustainability. Furthermore, as the Council has a deficit of housing completions with the result that it is significantly short of reaching its 5 year supply target, a limit on new housing in any part of the district cannot be given until the deficit in completions is made up to the 5 year level.
37. The contents of paragraph 55 of the NPPF are also considered to be material in the making of a decision on this case. Objections have been received stating that this proposal should not be allowed as it is outside the settlement limit for Thurston and that the site should be considered as countryside. Paragraph 55 of the NPPF makes it clear that Councils can no longer consider sites that are adjacent or near to a settlement limit to be unacceptable simply because they are the wrong side of the line. It now makes it clear that 'new isolated homes in the countryside will not be

supported and that Councils are encouraged to promote sustainable development in rural areas by considering housing development in locations where they could enhance or maintain the vitality of rural communities. It gives an example in paragraph 55 that new housing could provide increased facilities in one settlement which would be of benefit to it and the other surrounding settlements.

38. Having regards to the above, it is considered that the application site is not in an isolated location as it is adjacent to the built up part of the village, and the scheme will bring with it a new primary school, land for the secondary school as well as other contributions which will be of benefit to the residents of Thurston and the surrounding villages. Therefore, in terms of paragraph 55 of the NPPF, this proposal could be considered to promote sustainable development in a rural area. However, having regards to the fact that the Council does not have a 5 year supply of housing and has to balance the negatives of the scheme against the positives that it brings in line with the requirements of the NPPF, consideration of whether the scheme will be supported as sustainable development or not will be given in the conclusion to this report.
39. Other comments have been received stating that the Council should not consider this application and the others in the Thurston area until the Council determine a new style local plan and has established its stance on the location of new housing in the district. Comments have also been made that the Council should not determine this application until the Parish Council's Neighbourhood Plan has received its referendum vote. However, national policy, as contained in the NPPF, does not give the Council either of these options and requires all applications to be determined promptly and in accordance with the development plan. Whilst weight can be given to emerging policy in certain circumstances, the extent to which weight can be given to the emerging neighbourhood plan will be considered later in this report.
40. In reaching a decision, paragraph 47 of the NPPF is a material consideration and requires Local Planning Authorities to boost significantly the supply of housing, by identifying and updating annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements, with an additional buffer of 5% to ensure choice and competition in the market for land. As stated above, the Council cannot demonstrate a 5 year supply of housing and as such paragraph 49 of the NPPF applies and states that in this situation, the relevant policies for the supply of housing in the Council's adopted plan should not be considered to be up to date and that the scheme remains to be considered under the requirements of paragraphs 7 and 14 of the NPPF which defines what sustainable development is and how decisions should be made.
41. Since the submission of this application, four other developers have also submitted applications for residential development in Thurston. Bovis Homes have applied for 138 dwellings on land on the west side of Barton Road (4386/16); Laurence Homes have applied for 64 dwellings on land at Meadow Lane (4942/16); Hopkins Homes have applied for 175 dwellings (2797/16 and an identical proposal under reference number 5010/16 which they have appealed for non-determination) and Pigeon Capital for up to 200 homes and also a new primary school (5070/16). Including this application, 827 new homes are currently proposed in Thurston. There are also a further 92 dwellings which have planning permission at the Granary where works are commencing on site at present.
42. Following receipt of these applications an approach of joint working to explore cumulative infrastructure issues has been agreed between the respective applicants and the District and County Council. This has enabled the constructive exploration of

significant infrastructure issues on a collaborative but without prejudice basis to a consensual timetable. Therefore, as there are unprecedented numbers of new dwellings proposed, it is considered that all schemes must be considered both on their own merits and in combination with each other to assess if they meet the tests for sustainable development as outlined in the NPPF. The assessment of whether this proposal is considered to constitute sustainable development is given in the conclusion.

43. Policy FC1 of the Mid Suffolk District Core Strategy Focused Review states that it takes a positive approach to sustainable development and, as with the NPPF requirements, the Council will work proactively with developers to resolve issues that improve the economic, social and environmental conditions in the area. Related policy FC1.1 makes it clear that for development to be considered sustainable it must be demonstrated against the principles of sustainable development. The policy goes on to say that proposals for development must conserve and enhance the local character of the different parts of the district and how it addresses the key issues of the district.
44. The settlement of Thurston is one of the two largest villages in the district of Mid Suffolk (with the other being nearby Elmswell) where a wide range of local services and local infrastructure is provided. Thurston has both a primary and a secondary school, and a number of other local facilities which act as a service to the inhabitants of the village as well as providing employment opportunities. Whilst Thurston does not have a doctor's surgery, there is one in Woolpit and another in Moreton Hall which is a reasonably short journey away either by car or via public transport.
45. Thurston is also unusual in that it has a railway station which provides access for the residents to be able to commute to Ipswich, Bury St Edmunds and further afield without having to use their cars. Thurston is also on the Mendlesham to Bury St Edmunds bus route with a number of designated stops within the village.
46. In relation to paragraph 7 of the NPPF, the proposals would contribute to building a strong, responsive and competitive economy through the creation of construction and related jobs and the on-going contribution to the local economy from the creation of up to 250 additional households in the area. The proposals would also contribute towards providing the supply of housing required to meet the needs of present and future generations and by having the potential to create a high quality built environment, as well as contributions towards affordable housing, the highway network and other social infrastructure (public open space, education, health care) through a CIL contribution, or where appropriate, a section 106 agreement.
47. It must also be remembered that paragraph 49 of the NPPF makes it clear that housing applications should be considered in the context of sustainable development. The applicant is proposing up to 250 dwellings in this instance and they have confirmed that it is their intention if they get planning permission to commence with work on site as soon as possible following the granting of their reserved matters application. To speed this up, they have agreed to have a shorter period than is usual to submit their reserved matters application (2 rather than 3 years) which helps to justify that as a developer, they are serious about delivering the houses. They have also signed an agreement with Mid Suffolk and Suffolk County Council to work as a group with the other 4 other developers in Thurston to contribute to and work together to achieve the necessary infrastructure within the area to make this and the other 4 schemes sustainable.

48. Consideration of whether this proposal is considered to constitute sustainable development, having regard to the contents of policies FC1 and FC1.2 of the Adopted Core Strategy Focused Review and the contents of the NPPF will be reached in the conclusion to this report.

Site Access, Parking And Highway Safety Considerations

49. Policy T10 of the Mid Suffolk District Local Plan provides criteria on highway considerations when assessing planning applications. This policy requires access points into and out of the site to be safe and an assessment made as to whether the existing local roads can suitably accommodate the impact of the proposal, whether adequate parking and turning spaces exist within the site and that the needs of pedestrians and cyclists have been met. This policy is considered to carry significant weight in the determination of this application as it is in compliance with paragraph 32 of the NPPF which requires all schemes to provide safe access for all.
50. A number of objections have been received to the scheme on the grounds that the single access points point to serve the proposed dwellings from Ixworth Road would be detrimental to highway safety; the separate access point into the school is on a busy and potentially dangerous part of Ixworth Road and that the local road network as a whole is unsuitable and badly maintained for a development of a further 250+ dwellings. Mention has specifically been made that some local junctions are unsafe at present (see Parish Council objection for details as well as the Local Highway Authority consultation response), particularly those adjacent to the railway bridge to the south of the village, and that this scheme will exacerbate this problem as more vehicles will be using these junctions to access local roads, particularly the A14 to reach other destinations such as Bury St Edmunds and further afield. Comments have also been received that this scheme cumulatively with the other 4 schemes that have been submitted in Thurston for residential development will cause a significant and severe impact on the road network in the locality both in terms of congestion and safety.
51. The site is located to the north west of the village with Ixworth Road, Barton Road and Mill Lane bordering the site to the east and west respectively. Proposed is a single access point from Ixworth Road into the site with a separate access point from the same road to serve the proposed primary school. This is to help to split traffic accessing the dwellings from traffic accessing the new school at peak times in the interest of safety and traffic flow. An emergency access point into the site is proposed from Mill Lane which will only be available for use by the emergency services. The emergency access point will also double up as a pedestrian and cycle access into and out of the site outside emergency situations. Objections have been received on the grounds that the access points into the site are unsuitable for the volume of traffic that will use them and, as such, they will cause highway safety and congestion issues in the locality.
52. The LHA has not objected to the access points into the site from Ixworth Road and has confirmed that the emergency access layout as suggested by the applicant can be supported on highway grounds. They do not consider that the scheme as proposed is unsafe, nor do they consider that the transport statement provided by the applicant is unrealistic in its assumptions as referred to by the objectors. They identify that, subject to the necessary works being carried out as advised in the Highway Officer's consultation response, the scheme is considered to meet the requirements of paragraph 32 of the NPPF in that safe access can be provided for all. It must be remembered that the internal layout of the site is currently indicative only, and the opportunity would exist at reserved matters stage to design the layout to meet the

necessary highways standards. It should be noted that the Manual for Streets does allow 250 dwellings to be accessed with a single access point, and your Officers consider that to consider refusing this scheme on those grounds alone would be difficult to defend at appeal. Drainage deficiencies on the highway network, as referred to by one of the objectors, is something that the highway authority will need to assess and deal with under their own legislation, but in the absence of any objection from the LHA on this point, it is not considered that there are grounds to consider refusing the application on this basis.

53. The Local Highway Authority has considered the cumulative impact of this proposal along with the other 4 schemes currently before the Council both in terms of safety and congestion on the highway network in Thurston. They have come to the conclusion that the impact of the 5 schemes, if they are all delivered, will be severe. However, the LHA have made it clear that the NPPF requires all public bodies to try and resolve problems and they are confident that with a collective approach between all 5 developers, suitable and cost effective alterations can be made to the highway network to ensure that the impact is not severe. The highway officer has assessed the road network and has suggested alterations and improvements to key areas of it (see the LHA's consultation response earlier in this report for more information) and all 5 developers have been asked to contribute towards through either a section 106 agreement or through a Section 278 agreement under the Highways Act. All 5 developers, which include the applicant in this case, have agreed to contribute towards the works as requested by the Highway Authority. For this specific proposal, the Highway Authority is requesting £142,965 via a S106 agreement, and a further £130,000 under section 278 of the Highway Act.
54. As such, the LHA no longer considers that this proposal fails the requirements of paragraph 32 of the NPPF when considered cumulatively with the other 4 residential schemes, as the impact following the alterations carried out to the highway network will no longer be severe in terms of safety. For the avoidance of doubt, the LHA has not raised any objections to this scheme on congestion grounds and does not consider that additional traffic and queuing as a consequence of this scheme can be considered to be severe such as to sustain a refusal of planning permission.
55. The LHA identify that the scheme will offer sustainable travel options to local residents as additional pavements and improvements to the public right of way are proposed and these will link up the whole site to both existing facilities and those proposed on neighbouring sites proposed for development. This will help to improve accessibility on foot, cycling and via public transport and will ensure that the site is accessible to the local railway station. The Local Highway Authority is also recommending that the applicant is obligated via a S106 agreement to provide a travel plan to ensure that there are sustainable transport options available to the new residents of the scheme rather than just having to rely on their private cars to access local facilities.
56. Having regards to the specific and cumulative highway impacts of the scheme, when considered in line with the requirements of paragraphs 21 and 32 of the NPPF, the LHA has had regard to the fact that, in some locations, the impact of the granting of 827 dwellings will be severe on the highway network. However, these impacts can successfully be mitigated by the works to the network as suggested. Having regards to the above, it is considered that the proposal complies with the requirements of policy T10 of the local plan and paragraph 32 of the NPPF, in that safe and suitable access for all people can be achieved and that cost effective improvements can be undertaken to the transport network to ensure that non-motorised modes of transport can be used to access local facilities.

57. An objector has commented that the applicant is suggesting in his documentation that the speed limit adjacent to the site should be reduced from its current limit to 30mph and that this is a separate legal process that is outside this planning application. The LHA have confirmed that this scheme and the 4 others have been designed and considered at the existing speed limit and that their comments are given on that basis. They have advised that it would be in the public interest to alter the speed limit as suggested by the applicant and that this alteration is to be taken on under the relevant highway legislation.
58. Having regards to the above, it is considered that this proposal is acceptable in terms of highway safety and complies with the requirements of paragraph 32 of the NPPF and paragraph T10 of the local plan.

Design And Layout [Impact On Street Scene]

59. Section 7 of the NPPF refers to design. Specifically, paragraph 56 states that good design is a key aspect of sustainable development; it should contribute positively to making places better for people. Decisions should aim to ensure that development will function well and add to the overall quality of the area, establish a strong sense of place, create attractive and comfortable places to live, work and visit, optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Furthermore it provides that development should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The NPPF goes on to state it is "proper to seek to promote or reinforce local distinctiveness" (para 60) and permission should be "refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions" (para 64). In addition policy CS5 provides that *"All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area"* and echoes the provision of the NPPF.
60. Objections have been received stating that the site is currently an open field and that the scale and density of the proposal, particularly in reference to any 2.5 to 3 storey dwellings on the site, is considered to be inappropriate and not in keeping with the locality. Comments have also been made that the housing numbers should be reduced and there should be no units near the western boundary, or if these are essential they must be single storey. Objectors also wish to see connectivity improved through the site and comments have also been received on the basis that the proposal will extend the built up footprint of the village some way into the surrounding open countryside, which is unacceptable to the objectors and the parish council.
61. The application is in outline form and the plans as submitted provide an indicative layout of how the scheme could potentially look should this outline planning application be approved. This relates to the principle of the development of the site. This site does extend the built footprint of the village into the surrounding open countryside as the fields that surround it are currently undeveloped with residential development limited to only the small amount of dwellings on Barton Road and Mill Land to the west of the site. However, the applicant has taken account of this and is providing additional screening along all boundaries to help the proposal integrate into the countryside. The indicative density of the site at 31 dwellings per hectare is also not considered to be out high as referred to by the objectors and is not considered to be out of keeping with the existing dwellings in the surrounding locality. The points

that have been made by local residents at outline stage are useful for the applicant to formulate their reserved matters scheme where the matters raised above as objections will be considered rather than the principle of the scheme as is the case with an outline planning application.

62. Furthermore, objections have been received to this scheme on the basis that the proposal is lacking in bungalows and smaller house types. It must be emphasised that the proposal is in outline form and full details of the housing specification will only be given at reserved matters stage.
63. The Council's Sustainability Officer has also objected to the scheme on the grounds that insufficient information has been submitted on the environmental and sustainability measures that will be used throughout the scheme. In response, the applicant has submitted a sustainability statement highlighting the key sustainable practices to be incorporated into the design and construction of the development. Having regards to the above, it is considered that sufficient information has been submitted at this outline stage to overcome the concerns of the Sustainability Officer.
64. Having regards to the above, it is considered that the scheme in terms of its suggested layout constitutes good design in line with the requirements of the NPPF and local policy CS5 as it proposes a form of development that would reflect the character, scale and appearance of the surrounding settlement. It is agreed that the site does project into the surrounding countryside; however this matter needs to be balanced having regards to all of the positive benefits that the scheme brings. As stated in previous topics above, that will be done in concluding this report.

PARISH PLAN / NEIGHBOURHOOD PLAN

65. A Neighbourhood Plan designation was confirmed in 2013 and covers the Parish of Thurston. At the time of the consideration of this proposal, the parish have set up a Neighbourhood Plan Committee to prepare the policies for the new Neighbourhood Plan. Both the Parish Council and their Neighbourhood Plan Committee have objected to this scheme with the latter raising objections based on some of the early work that they have carried out for the evidence base for the new plan.
66. The Planning Practice Guidance identifies that *"Paragraph 216 of the National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan. The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals. And all representations on the proposals should have been submitted to the local planning authority by the close of the local planning authority's publicity period. It is for the decision maker in each case to determine what is a material consideration and what weight to give to it"*.
67. As such, whilst it is ultimately for Members to determine the weight that should be given to the plan, whilst it is at an early stage in its development, it is the view of Officers that little material weight can be given at this time.

Landscape Impact

68. Paragraph 58 of the NPPF states that proposals should provide appropriate landscaping to ensure that they integrate well into the surrounding locality. This requirement is repeated in one of the requirements of policy H13 of the Mid Suffolk District Local Plan.
69. Objections have been received to this proposal on the grounds that the site lies in an exposed location and that the approval of this scheme will erode the intrinsic beauty and the character of the surrounding open countryside. The indicative layout for this proposal shows a thin boundary of landscaping along the northern and eastern boundary of the site. The Council's Landscape Consultant has been consulted on this scheme and he has advised that the proposal will significantly change the visual character of the site from agricultural to residential. However, they have not objected to the scheme and have only raised detailed matters with the landscaping of the scheme which the applicant can address at the reserved matters stage, given the indicative nature of the proposal at this stage. The site will clearly be viewed from points in the surrounding open countryside as identified in the LVIA, but this impact can be mitigated by improvements to the site boundary landscaping. The Council's Arboricultural Officer has also been consulted on the scheme and has not objected to it, advising that the trees that are to be lost are of limited amenity value and that this should not be used as a constraint for the development of this site.
70. To the south of the application site (but not within the application red line) lies the school playing field of Thurston Community College. This land is designated in the Mid Suffolk Local Plan under policy SB3 as a visually important open space. The policy says that land within or abutting settlement boundaries is considered to be designated as visually important open space due to the contribution that it makes to the character and appearance of the surroundings, and also due to the amenity value of the land to the local community. The policy goes on to say that the Council will restrict development that will have a harmful on the designated visually important open space because of the contribution it makes in its undeveloped form to the distinctiveness of its own setting, or the character of a settlement or a nearby landscape.
71. The NPPF talks within its core values of recognising the intrinsic character and beauty of the countryside when making planning decisions and, in paragraph 109, it states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.
72. However on examining subsequent paragraphs to 109, the NPPF only places emphasis on the protection of nationally designated landscapes such as the National Parks, the Broads and Areas of Outstanding Natural Beauty or areas where biodiversity could potentially be harmed. Policy SB3 is a local designation and consideration needs to be given as to the weight to be apportioned to it having regards to its degree of consistency with the NPPF (paragraph 215). Policy SB3 is restrictive as it aims to protect views and the amenity of the countryside from the designated site, whilst the NPPF tends to provide advice on nationally designated landscapes and specifically on landscapes where biodiversity impact needs to be considered. However, as the NPPF does state in its core values and in paragraph 109 that planning decisions should protect and enhance valued landscapes, it is considered that policy SB3 does merit some weight in the decision making process. It is considered that the weight given is greater than moderate due to compliance with the core values and paragraph 109, but less than significant as the designation is a local designation and not a nationally designated landscape. Therefore, it is considered that policy SB3 should carry medium weight in the determination of this proposal.

73. The visually important open space area is the playing field to the Thurston Community College. The land is separated from the agricultural field to its north by a substantial belt of trees which runs along the boundary from Ixworth Road to Barton Road. The applicant is proposing to develop 250 houses and a new school to the north of this boundary (albeit, separated by a strip of land which will be given over as land to the College for their use) and, as such, the designated open space itself will not be developed on and will remain as envisaged in the local plan. However, the setting of the land, the impact of it on the character of the entrance to the village and the surrounding landscape will change as a consequence of this proposal. When travelling south along Ixworth Road into Thurston, only the belt of trees can be seen between the field boundary and the designated land. The road user is unaware that the land behind the tree cover is designated due to its amenity or the contribution that it makes to the amenity of the area as it is not open and does not feel like part of the agricultural fields that makes up the surrounding open countryside. The tree buffer encloses the land and provides a green but hard edge to the settlement along Ixworth Road and it can be argued that the development of this site will have a limited impact in terms of amenity on the designated land, or on the approach to Thurston which policy SB3 aims to try and protect if the applicant provides a similar level of screening along the eastern and northern site boundary as advised by the Council's Landscape Consultant.
74. Objections have been made to the scheme by both the Ramblers Association and by local residents that this proposal will alter the character of the public footpath that runs through the site and this will limit its enjoyment. It is noted that as part of this scheme a public footpath runs from Barton Road through the site towards Ixworth Road and the applicant is to incorporate it into the layout of the scheme. It is further noted that the Highway Officer requires improvements to this path as part of the connectivity through the site and into the wider area. It is agreed that the small part of the footpath that will run through the site will change in character from a rural path that runs through an open field to one that runs through a landscaped part of a housing estate. This is unfortunately unavoidable, but given the limited length of the path that would be affected, it is considered that this would not unacceptably affect the character of the path to such an extent that would weigh heavily against this proposal.
75. Having regards to the requirements of policy H13 of the MSDC Local Plan and paragraph 58 of the NPPF, it is considered that the scheme can provide suitable screen landscaping both within and on the boundaries of the site to ensure that it assimilates well into the rural edge of Thurston and provides an attractive environment both for the new residents of the site and those living in the surrounding locality. The proposal will have an impact on the setting of the visually important open space area which lies to the south, but it is considered that this will not be significant and that it can also be overcome by the provision of suitable landscaping to help screen the site and integrate it into the surrounding open countryside.

Residential Amenity

76. Policies within the adopted development plan require, inter alia, that development does not materially or detrimentally affect the amenities of the occupiers of neighbouring properties. This requirement is emphasised in the NPPF Core Values in paragraph 17, where it states that all schemes should seek a good standard of amenity for all existing and future occupants of land and buildings.

77. This proposal is in outline form where there are no specific details of the exact location, orientation and types of houses proposed. There have been objections to this proposal on the grounds that it will affect the amenities of the occupiers of the dwellings on Mill Lane. The residents of Mill Lane currently face out on an open field and they are concerned that the development of dwellings on the land adjacent will alter their outlook and negatively affect their residential amenities. It is agreed that the erection of dwellings on land to the east of the properties on Mill Lane will change the outlook experienced by the residents, who currently have a view of a field as opposed to what may be in the future, other residential properties. This change would be unavoidable if planning permission is granted for this scheme, however, it is considered that the applicant can design the layout, house types and landscaping to minimise impact on the existing residents such that the impacts would not give rise to an unacceptable loss of amenity in planning terms. The Council's distance requirements between dwellings would also have to be adhered to, so that loss of daylight and sunlight and overlooking to the existing residents of Mill Lane would be minimised.
78. Whilst the proposal is in outline form, the indicative layout plan as suggested by the applicant does not give rise to any significant concerns in terms of loss of neighbouring amenity. If this proposal is approved, details in relation to form, design, the energy efficiency of the scheme, the distance between the dwellings and landscaping along the periphery of the site can be developed as part of the reserved matters application so as it meets the relevant NPPF core value in paragraph 17 and the requirements of paragraph 123. If permission is to be granted, a condition can be imposed requesting that the applicant enters into a construction management agreement with the Council to safeguard the living conditions of the surrounding occupiers, as requested by the Council's Environmental Health Officer.

Environmental Impacts - Trees, Ecology And Land Contamination

79. The application site is a grade 2 agricultural parcel of land which is currently in use for agricultural purposes and is adjacent to the built up part of Thurston along Ixworth Road. As the site is in an agricultural use, there is limited tree cover within the site with the majority of the trees running along the highway boundaries of the site.
80. Objections have been received to this scheme from local residents and the Suffolk Wildlife Trust on the basis that the loss of the field and the hedgerows on the boundary of the field to create residential development will have a negative impact on animal species, particularly protected and priority species in the locality. Mention has specifically been made that the Wildlife Trust considers that the site is a prime habitat for Skylarks and that the applicant's survey was done too early in the year hence why Skylarks were not identified to be on the site at that time. Reference has also been made by objectors to the scheme that the proposal will harm bats which feed in the hedge which separates the site from the college playing field.
81. Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) requires all "competent authorities" (public bodies) to "have regard to the Habitats Directive in the exercise of its functions." In order for a Local Planning Authority to comply with regulation 9(5) it must "engage" with the provisions of the Habitats Directive. The content of paragraph 118 of the NPPF is also applicable to the consideration of this proposal, as it states that when determining planning applications, consideration must be given to 6 principles. Two of those principles are particularly relevant to the consideration of this proposal, being;

- If significant harm is caused which cannot be avoided or mitigated by conditions then planning permission should be refused.
 - Opportunities to integrate biodiversity in and around developments should be supported.
82. The Council's Consultant Ecologist has been consulted on this application and has not objected to it in terms of its impacts on protected species and has not raised any concerns about loss of hedgerow within the site. For the sake of clarity, the hedgerow that the objector refers to as being the feeding grounds for bats is not being removed, and the land adjacent to it is not being developed as part of this application. Any future applications by the college to expand its land/buildings whereby the hedge would be removed would need to be considered at that time.
83. The Ecologist shares the concerns of the Wildlife Trust with regards to the potential loss of Skylark habitat which is a UK and Suffolk Priority species and has asked the applicant to provide mitigation in the form of two Skylark nest plots at another location away from the application site. The applicant owns land in the adjacent field and the Ecologist agrees that this would provide a suitable area to mitigate for the loss of the existing habitat. As the land is in the ownership of the applicant and is shown with a blue line around it, this matter can be suitably controlled by the use of planning conditions.
84. The Suffolk Wildlife Trust has raised concerns over the management of the open space areas, particularly the sustainable drainage system within the site and what impact this will have on the ecology that establishes within it. The Council is not intending to adopt the landscaped areas within the site, but through a S106 agreement is requesting that the developer sets up a management company who will look after the open spaces and landscaped areas within the site, for the benefit of the new residents of the site and to ensure that its ecological value is retained and enhanced in future years.
85. The Wildlife Trust has also raised concerns about the fact that the lighting from the site could have a negative impact on the landscape and biodiversity, however it is considered that this can be controlled by a suitable condition if planning permission is granted for this proposal.
86. Paragraph 112 of the NPPF states that local authorities should take into account the economic and other benefits of the best and most versatile agricultural land when making planning decisions. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use poorer quality land in preference to that of higher quality land. Agricultural land is split into categories with land defined as 3a up to 1 being best and most versatile land and grades 3b down to 5 not being defined as best and most versatile land. The application site is a Grade 2 and as such it is defined as best and most versatile agricultural land and as such the requirements of paragraph 112 of the NPPF apply to the determination of this scheme. Paragraph 112 does not preclude the development of land classified as best and most versatile agricultural land; it requires local authorities in making decisions to take account of the economic and other benefit of the best and most versatile agricultural land. The NPPF states that where significant development is proposed, local authorities should seek to use areas of poorer quality land in preference to the higher quality land.
87. The applicant has submitted an agricultural assessment with his application to allow the council to make the assessment as required in the NPPF. In the assessment the applicant identifies that the parcel of land cannot be considered to be 'significant' as

this is defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 where it states that Natural England should only be consulted on plans involving the loss of 20ha or more of land on grades 1, 2 and 3a. As such, the parcel of land falls below the threshold and, therefore, it is not necessary to sequentially consider other land which is of a poorer quality. It is your officers view that the applicant's position can be supported, and this position has been replicated in other Council's where similar schemes have come forward for consideration. In considering the economic and other benefit of the land, it must be remembered that the parcel of land constitutes only 13ha out of the landowner's total holding of 65ha and as such much of it will remain in production. Having looked at the agricultural land classifications for Mid Suffolk, most of the land within the district is classified as 2, 3a and 3b with very little land in the lower categories. As the district is predominantly rural in character it is not considered that the loss of this parcel of land either on its own, or considered cumulatively with the 4 other sites that have been put forwards for development in Thurston, will have a significantly negative impact on agriculture and specifically food production, or on the local economy.

88. The Council's Contaminated Land Officer has been consulted on this scheme and has reviewed the documentation submitted by the applicant (Phase 1 risk assessment). Paragraph 121 of the NPPF makes it clear that planning decisions should make sure that the site is suitable for its new use taking account of the hazards of any previous use. The Contaminated Land Officer has not raised any objections to the scheme subject to the imposition of conditions requesting that the works on site be carried in line with the applicant's contamination report.
89. Having regards to the above it is considered that the proposal complies with the requirements of paragraph 112 of the NPPF in terms of agricultural land, its effects on Priority Species can be mitigated and the landscaped areas within the site can be adequately maintained in the future to protect their biodiversity value.

Heritage Issues (The Setting Of Neighbouring Listed Buildings)

90. Both the NPPF and Core Strategy place significant emphasis on safeguarding heritage as an important component of sustainable development.
91. With reference to the treatment of the submitted application, the Council embraces its statutory duties and responsibilities in relation to listed buildings, notably the general duties undersections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires the local planning authority to have "*special regard to the desirability of preserving [a] building or its setting or any features of special architectural or historic interest which it possesses*".
92. Recent case law on the application of the statutory duty acknowledges that the consideration of the impact of a proposed development on the significance of a designated heritage asset is a matter for its own planning judgement, but that the Local Planning Authority is required to give any such harm considerable importance and weight. However, where special regard to the desirability of preserving heritage assets has been paid and no harm is considered to be posed, the 'balancing' of harm (which should be given considerable weight as above) against public benefits as required by the NPPF, is not engaged.
93. Policy HB1 (Protection of Historic Buildings) places a high priority on the protection of the character and appearance of historic buildings, particularly the setting of Listed Buildings.

94. In paragraph 17 of the NPPF it makes it clear that development should “*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*”. Para 131 goes on to state that “*In determining planning applications, local planning authorities should take account of; the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.*” Furthermore Para 132 states “*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.*”
95. Objections have been received to this scheme by members of the local community on the basis that the proposal is harmful to the setting of Manor Farm Barn which is grade II* listed, and the converted barns to the north of this building which are also grade II listed. Manor Farm lies a significant distance to the east of this site and is separated from the site by a significant number of fields, one of which forms part of the Pigeon Capital application for 200 dwellings.
96. Historic England and the Council’s Heritage Officer have been consulted on the application. Neither Historic England nor the Council’s Heritage Officer has objected to this scheme. The Heritage Officer considers, by virtue of the distance and the orientation of the application site to Manor Farm, that there would be some harm to its setting, but the effect would be low. This is particularly the case if the Pigeon site is taken into consideration as it in effect lies between the application site and the group of listed buildings.
97. In accordance with NPPF paragraphs 129, 132 and 134 in determining this proposal the Council needs to consider whether the identified harm can be avoided or minimised, and whether that harm is outweighed by the public benefits arising from the proposal. It is considered that as the Council does not have a 5 year supply of housing as required by paragraph 47 of the NPPF (the current supply is 3.9 years) that the proposal will help to contribute towards this deficit by providing up to 250 new dwellings which will provide public benefit. The scheme will also deliver 35% of the dwellings as affordable properties to help to meet the need in the locality, and further contributions which cover matters such as an improvement to the library, a contribution towards a new primary school and pre-school facility, the provision of land for the primary school and additional land for the community college as well as CIL monies to facilitate improvements to the doctor’s surgery. The scheme will also contribute towards improvements to the highway network in and around Thurston to ensure that the road network remains safe for its users. The scheme will bring with it public benefits also in the form of construction related jobs and also additional residents to help sustain and grow local services and businesses.
98. As such, it is considered that the public benefits of this scheme are such that outweigh the less than substantial harm that has been identified to the setting of the listed buildings and, therefore, the scheme can be supported on heritage grounds.

99. As there are 5 different applications for major housing development in the northern part of Thurston, the Council's Heritage Officer has been asked to consider the cumulative impact of this scheme in relation to the others. Of the 5 applications, the application by Hopkins Homes for 175 homes (application 2798/16 and appeal 5010/16) and the one by Pigeon Capital (5070/16) are the only two out of the 5 that are considered to cumulatively have an impact on the settings of the listed buildings and this is assessed more appropriately in the reports for both of those applications.

Environment and Flood Risk

100. Paragraph 100 of the NPPF makes it clear that inappropriate development in areas of flood risk should be avoided by directing development away from areas of highest risk. The contents of policy CS4 of the Mid Suffolk Core Strategy is in line with the requirements of the NPPF in terms of flood risk and carries significant weight in the determination of this application. In terms of flooding from rivers, the site complies with local and national policy as it lies in a flood zone 1 area which is land at least risk of flooding. To deal with surface water, the applicant is proposing a drainage pond within the south western corner of the site with the surface water flow from the site channelled into it.
101. Objections have been received raising concerns that the development of the site may cause localised floods in the area. Anglian Water and the Flood and Water Team at SCC have been consulted on this proposal. Anglian Water has not responded to the consultation request, but the Flood and Water team has advised that they do not object to the scheme subject to the imposition of a condition requiring the scheme to be built in line with the submitted drainage strategy.
102. Due to unprecedented level of growth currently suggested for Thurston, the Environment Agency, Flood and Water team and Anglian Water have been specifically asked to consider the cumulative impact of this proposal on drainage, flood risk and water supply grounds. The Environment Agency and the Flood and Water team have advised that an increase of 827 dwellings with the mitigation measures proposed by the applicants will not increase flood risk in the locality to an unacceptable level. Confirmation has also been received that there is capacity in the local pumping station to serve 827 new dwellings in terms of sewage needs. Thurston lies in an area where water supply can be an issue, however Anglian Water has a duty by law to supply new houses with a water supply and this is a matter for them to resolve under their legislation.
103. Having regards to the above, it is considered in terms of flood risk, water supply and drainage that the scheme when either considered singularly or cumulatively can be made acceptable subject to the imposition of a suitably worded condition to meet the requirements of paragraph 100 of the NPPF and policy CS4 of the Mid Suffolk Core Strategy.

Infrastructure - Planning Obligations / CIL contributions

104. Objections have been received to this scheme on the grounds that the local infrastructure, which includes the local schools and health care, is insufficient to meet the need of the residents of this proposal. Comment has been made that if the scheme is approved without suitable provision, then it will cause significant impact on the existing community of Thurston.
105. The Council has now implemented CIL which accordingly takes on board requirements such as open space contribution, NHS and education contributions.

106. As part of this proposal the contributions will be sought under the Council's CIL Scheme for improvements to the following:
- For the future expansion of the doctor's surgery in Moreton Hall which the residents of this scheme would use.
 - For improvements to the local library provision.
107. Local residents have made comment that a new doctor's surgery will not be provided and that the proposal will cause capacity issues at the local surgeries. It should be noted that the PCT has made it clear that, due to the existing situation with doctors, their salaries and contracts, and the government's policy in terms of the NHS, a new doctor's surgery will not be achieved in Thurston as part of any of the 5 schemes. The PCT will be requesting contributions through CIL in relation to all 5 schemes and the monies will be used to improve the service offered and/or improve the facilities at either the Woolpit Surgery or at the Park Farm Surgery in Moreton Hall to meet the expected needs of the additional residents of the new dwellings in Thurston. They have specified that they will seek a contribution towards improvements at the Woolpit Surgery in relation to this proposal.
108. An objection has also been received on the basis that the scheme will put more pressure on the emergency services in the area. However, it must be remembered when additional dwellings are built, these become the subject of Council Tax. The emergency services levy precepts as part of the Council Tax and these will be used towards providing a level of service that is needed to cater for the needs of the residents of the new housing developments.
109. It has been identified following discussion with the County Infrastructure Officer that there is no capacity in the local primary school to expand and, as such, a contribution of £1,018,598 is required towards the building of a new 420 place two form primary school either on this site or the Pigeon Capital site elsewhere in the village. It has also been suggested that a further £208,325 is required for the provision of a new pre-school, which will be accommodated at the new school to help meet the demand generated by this development. As the Council's CIL 123 list does not include the provision of new pre-school or primary school facilities (it only covers extensions to existing establishments) these contributions will have to be sought under S106 of the Planning Act and the applicant has agreed to the above payments. This application is one of two in Thurston at present which is proposing to include land for a new school as part of its proposal for residential development, and the County Council is working with both developers to secure both sites. The County Council will decide which of the two sites it prefers in terms of accessibility and has confirmed that it will return the site that it doesn't want to the developer for them to consider in discussion with the Council what alternative use this land may be put to.
110. Objections have been made to this scheme as to what will happen if the new houses are built and occupied before the new school is finished. The County Council has confirmed that whilst the new school is being built, it has been suggested that the existing school will be provided with two temporary classrooms funded via CIL to cope on a 2 to 3 year period with the increase in pupils generated from the first phase of new housebuilding in Thurston (from any of the 5 sites currently under consideration) until the new school is built. Once that happens, the existing school will be closed and the existing pupils moved over to the new school. The new school will be extended as appropriate up to a capacity of 420 pupils to accommodate the primary school age children arising from any of the proposed housing sites in Thurston. It is understood that the Diocese, who own the primary school, have

committed to using the capital receipt that they receive for the development of the existing school site into the new school which is also to be funded by a joint contribution by all 5 of the developers proposing major housing schemes currently in Thurston.

111. Following further dialogue with the County Obligations Manager it is understood that progress is being made to secure options on the potential school sites proposed in other applications. The delivery of a new primary school is a necessary pre-requisite to mitigate the potential pressure on education infrastructure from the development and it has been agreed that a restrictive phasing condition is not necessary given the progress that has been made on options. Nevertheless the securing of a primary school site is a material consideration upon which the delivery of this development is predicated.
112. The County Council has confirmed that there is capacity at all of the catchment secondary schools in the locality and, as such, a financial contribution towards new facilities is not warranted in that instance. The applicant has, as part of this application, been in discussion with the College and the County Education Authority and is proposing to provide land immediately to the north of the existing playing field to the college to purchase for their use. The County Council has confirmed that there is a need for this land as the college has extended within its existing site over the years onto the external play areas which have resulted in a deficiency. They have confirmed that the parcel of land put forwards by the applicant would help to resolve this issue.
113. As is the case for new education buildings, affordable housing is not part of CIL and members should note that the policy which seeks up to a 35% provision remains in effect. The applicant has confirmed that they are agreeable to provide a policy compliant scheme for affordable housing and that this will be achieved via a Section 106 contribution. On this basis, the Council's Strategic Housing Officer has not objected to this proposal.
114. Network Rail has been consulted on this scheme and has asked for a contribution of £1million through a S106 agreement between all five developers to close the existing level crossing and to provide safer and improved facilities at Thurston Railway Station having regards to the increased use of the facilities that will occur from the residents of the proposed 827 dwellings. The Council's CIL 123 list includes provision for improvements to transport infrastructure As such it is considered that it would be appropriate for Network Rail to bid for the specified amount to make the improvements they have requested to improve pedestrian safety at the station under the CIL scheme.
115. The Local Highway Authority has, as stated earlier in the report, asked for £176,877 as a section 106 contribution to contribute to the applicant's part of the contribution for works to the highway infrastructure. This is sought to ensure that the impact of approving all 5 housing schemes totalling 872 houses in Thurston is not severe on the highway network, as referred to in paragraph 32 of the NPPF.
116. It is noted that within the application site there is a pond, open space and landscaped areas and concerns have been received from Suffolk Wildlife Trust over how these will be maintained. This will be done via a S106 agreement whereby the developer has to employ a management company to look after this land. There is no proposal for this to be transferred to the Council or the Parish Council as part of this or any of the other 4 schemes.

117. Having regards to the above, in accordance with the Community Infrastructure Levy Regulations, 2010, the obligations recommended to be secured above by way of a planning obligation deed are (a) necessary to make the Development acceptable in planning terms (b) directly related to the Development and (c) fairly and reasonably relate in scale and kind to the Development.

Other Issues

118. Objections have been made to this scheme on the grounds that there are other more suitable sites elsewhere and that these should be considered first. It must be remembered that each planning application must be considered on its own planning merits and there is no national requirement for a sequential test for preferred housing sites within an area.
119. An objection has been received on the basis that the proposal will turn Thurston from a village into a town. Whilst Thurston will get larger as a consequence of additional housing growth, its status will remain as a village and it does not automatically turn into a town. At face value, this objection is not considered to be material in the consideration of this proposal, although Members are advised that consideration of the scale of development relevant to the existing settlement is something that requires consideration.

Details Of Financial Benefits / Implications (S155 Housing and Planning Act 2016)

Council Tax payments from the dwellings when built

Planning Delivery Grant from Central Government for delivering the dwellings

S106 Agreement:

- £1,018,598 is required towards the building of a new primary school in Thurston.
- £80,228 towards the cost of the land to provide the new primary school.
- £208,325 is required for the provision of new pre-school facility in Thurston
- £176,877 is required for highway infrastructure works
- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years.
- Travel Plan Implementation Bond, or cash deposit - £127,975 (£512 per dwelling).
- CIL payments per dwelling built on site.

PART FOUR – CONCLUSION

Planning Balance

120. The proposal for residential development on land between Ixworth Road, Barton Road and Mill Lane in Thurston is considered to be contrary to the adopted Mid Suffolk Core Strategy as the application site lies within the countryside, outside the built framework of the settlement of Thurston on what is open agricultural land.
121. However, as the housing policies in the Core Strategy are out of date due to the Council not having a deliverable five year supply of housing, this scheme falls to be considered in relation to paragraph 14 and 49 of the NPPF which relate to residential development and sustainable development.

122. Paragraph 14 states that where the development plan for the area is out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole or specific policies in the NPPF which indicate that the development should be restricted. Whilst it has been identified that the proposal (either in isolation or when considered cumulatively with the 4 other schemes under consideration in the village) does give rise to negative impacts which weigh against the proposal, such as the adverse impact on the quality of the landscape character of the area, the irreplaceable loss of countryside and grade 2 agricultural land, the impact on an area designated as land that is visually important, the less than substantial harm on the setting of listed buildings in the locality and the potentially severe impact on parts of the highway network if not mitigated, it is considered that the benefits that the scheme brings through the provision of 250 new housing, the securing of 35% of which would be affordable properties, contributions towards local infrastructure such as the highways improvements, provision of open space and the new school and land for the secondary school to expand on that the appellant has agreed to contribute, outweighs the negative issues.
123. Significant weight must also be given to the fact that there are no objections from the Council's consultees to the scheme. There are no objections in terms of design; crime prevention; amenity; pollution; contamination; ecology; landscape; flood risk and drainage. The proposal will also help to deliver construction jobs and will also provide more residents who will help to sustain and potentially grow the local economy.
124. In relation to highways impacts there are road safety impacts which can be addressed through mitigation at Fishwick Corner and other highways infrastructure improvements which weigh in favour of the scheme by providing enhanced sustainable links.
125. There remains a road safety and capacity issue at the A143 Thurston Road junction (adjacent to The Bunbury Arms). A number of solutions have been investigated and the current preferred solution is traffic signals. The highway authority consider that the effects of the development can be mitigated but further detailed work needs to be undertaken to obtain the most practicable and viable solution to address the risks. For this reason Committee is asked to reach a "minded to" resolution which reserves the local planning authorities position pending the outcome of that detailed further investigation and junction design. Once the outcome of this investigation is known the application can be reported with a substantive recommendation to Committee.
126. Therefore, it is considered having regards to paragraph 14 of the NPPF that the benefits the proposal would deliver outweigh the negative elements of the scheme. Furthermore, when assessing the proposal against the NPPF as a whole, it is not contrary to its requirements and there are no specific policies within it that would restrict this development and, as such, it is considered that it constitutes sustainable development which should be granted planning permission in line with the requirements of paragraph 14.

Statement Required By Article 35 Of The Town And Country Planning (Development Management Procedure) Order 2015.

127. When determining planning applications The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain how, in dealing with the application they have worked

with the applicant to resolve any problems or issues arising.

128. In this case the planning authority has worked with the applicant to overcome highway objections to the scheme and to clarify issues relating to drainage and the impact on listed buildings.

Identification of any Legal Implications of the decision

129. There are no known legal implications derived from the determination of this application.
130. The application has been considered in respect of the current development plan policies and relevant planning legalisation. Other legislation including the following has been considered in respect of the proposed development.
- Human Rights Act 1998
 - The Equalities Act 2012
 - Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
 - Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
 - The Conservation of Habitats and Species Regulations 2010
 - Localism Act
 - Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

RECOMMENDATION

That Committee express a “minded to” resolution, subject to the further investigation and reporting back of highway matters in relation to the A143 Thurston Road junction, on the following basis:

That the authority would be minded to delegate to the Corporate Manager - Growth & Sustainable Planning to grant full planning permission subject to the prior completion of a Section 106 or Undertaking on terms to his satisfaction to secure the following heads of terms:

- £1,018,598 is required towards the building of a new primary school in Thurston.
- £80,228 towards the cost of the land to provide the new primary school.
- £208,325 is required for the provision of new pre-school facility in Thurston
- 35% Affordable Housing to be transferred over to a Registered Provider
- To secure the provision of public open space to be managed by a dedicated management company
- £176,877 to secure off site highway improvement works as listed below:
 - 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.
 - 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.

- Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £86155 is required on commencement of construction work on site.
- 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.
- Extension of the 30mph speed limit to Thurston Rugby Club. A contribution of £8000 is required on commencement of work on site.
- To secure a travel plan in connection with the scheme detailed as follows:
 - 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.
 - Travel Plan Implementation Bond, or cash deposit - £127,975 (£512 per dwelling).

and that such permission be subject to the conditions as set out below:

- 1) Two year time limit for submission of reserved matters (As opposed to the usual 3)
- 2) Reserved matters (outline)
- 3) Existing tree protection
- 4) Construction management agreement
- 5) External lighting
- 6) Commencement period for landscaping
- 7) Protection of birds during construction period
- 8) Works to be carried out in line with the ecological report.
- 9) Archaeology
- 10) Highway Conditions
- 11) Surface water drainage
- 12) Implementation in line with recommendations of the ecological report.
- 13) Fire Hydrant requirements
- 14) Skylark mitigation

Application No: 4963/16

**Address: Land West Of Ixworth Road
Thurston
IP31 3PB**

Page 53



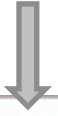


Verbal Updates:

- Confirmation and summary of any 3rd Party representations received not previously issued to members.
- Confirmation and summary of any consultee responses received not previously issued to members
- Confirmation of any changes to recommendation, conditions or reasons.



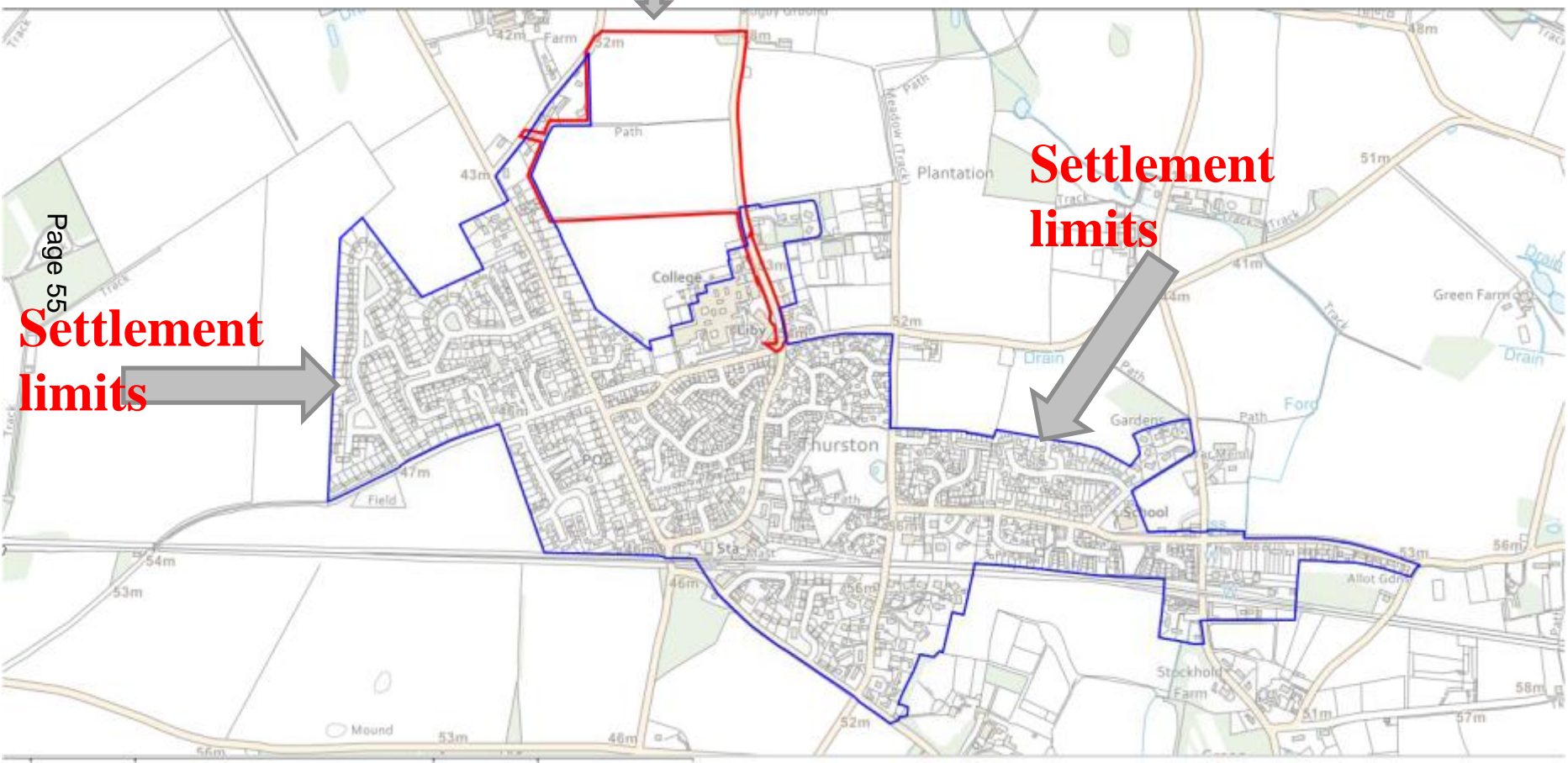
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Settlement limits

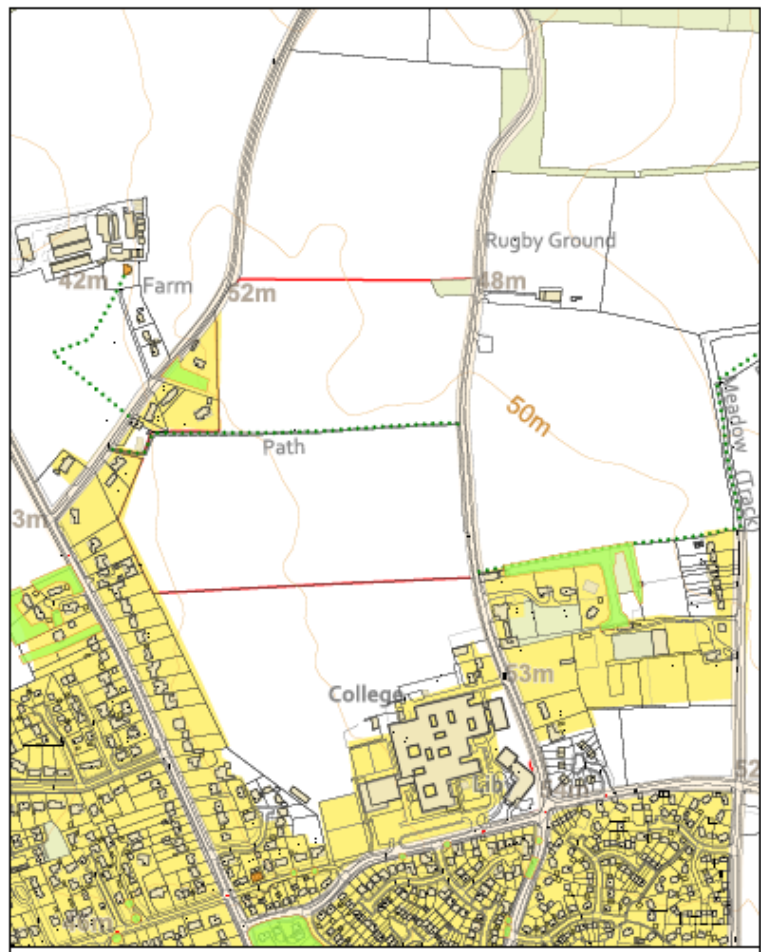


Settlement limits



Site Location & Constraints Map

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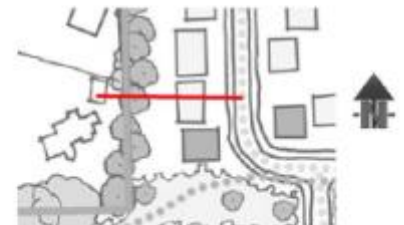
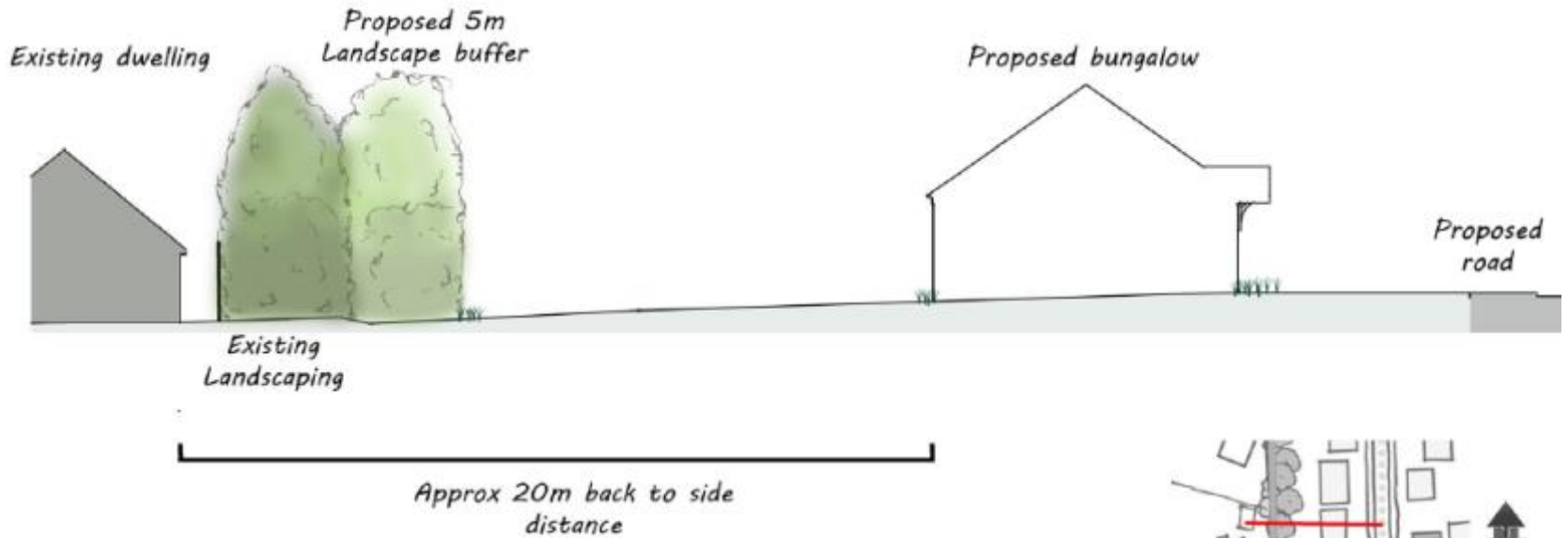
| | |
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| <p>Title: Committee Site Plan Reference: 4963/16 Site: Land West of Ixworth Road Thurston IP31 3PB</p> | |
| <p>MID SUFFOLK DISTRICT COUNCIL 131, High Street, Needham Market, IP6 8DL Telephone: 01449 724200 email: customerservice@csdcuk.com www.midsuffolk.gov.uk</p> | <p>SCALE 1:5000 Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2017 Ordnance Survey Licence number: 100017858</p> |

Indicative site layout plan



Western boundary Cross Section

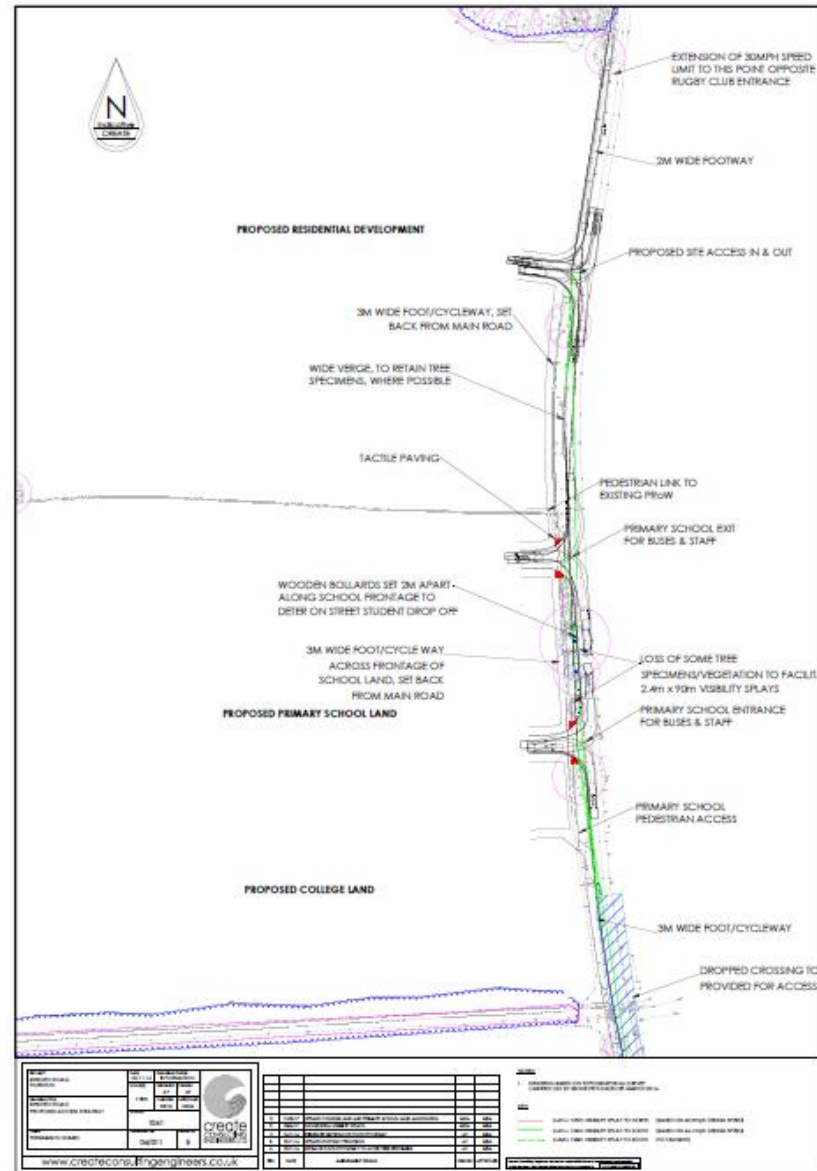
Page 58







Access Points into the site



100 100 100000

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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 582721

Our ref: **W:** P00547636

13 January 2017

Dear Mr Jones

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

**LAND WEST OF IXWORTH ROAD, THURSTON , SUFFOLK, IP31 3PB
Application No. 4963/16**

Thank you for your letter of 12 January 2017 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely



David Eve

Inspector of Historic Buildings and Areas

E-mail: david.eve@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 16 January 2017 09:27
To: Planning Admin
Subject: 4963/16 - Consultation Response

Application ref: 4963/16
Our ref: 205950

Dear Sir/Madam,

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,

Jamie Clarkson
Consultations
Natural England
Hornbeam House, Electra Way
Crewe Business Park
Crewe, Cheshire CW1 6GJ

tel 0300 060 3900
email consultations@naturalengland.org.uk

www.gov.uk/natural-england

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

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

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

For further information on the Discretionary Advice Service see [here](#)
For further information on the Pre-submission Screening Service see [here](#)

From: Iain Farquharson
Sent: 19 January 2017 15:40
To: Planning Admin
Subject: M3. 188878: Consultation on Planning Application 4963/16

Dear Sir/Madam

We have reviewed the documents provided and are unable to find details as to the environmental impact mitigation/sustainability credentials of the proposed dwellings.

Policy CS3 encourages sustainable construction techniques such as using sustainable materials, minimisation of water use, suitable design to maximise solar gain and high levels of insulation to minimise energy use.

In addition the Overall Spatial Vision is:

"By 2021 the East of England will be realising its economic potential and providing a high quality of life for its people, including by meeting their housing needs in sustainable inclusive communities. *At the same time it will reduce its impact on climate change and the environment, including through savings in energy and water use* and by strengthening its stock of environmental assets."

Core Strategy Objectives SO 8

New development will be of a high standard of design and layout and will address the need for energy and resource conservation.

We request the developer provide information as to their proposals in this area. Until satisfactory information is received the recommendation is refusal of permission.

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

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Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

From: David Pizzey
Sent: 20 January 2017 10:18
To: Dylan Jones
Cc: Planning Admin
Subject: 4963/16 Land west of Ixworth Road, Thurston.

Dylan

I have no objection to this application subject to it being undertaken in accordance with protection measures outlined in the accompanying arboricultural report. Although a small number of trees are proposed for removal these are generally of limited amenity value and should not be considered a constraint.

If you are minded to recommend approval of the scheme then we will require additional information including a detailed method statement and tree protection plan shown against a final layout. This can be dealt with as part of reserved matters or under planning condition if necessary.

Regards

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzey@baberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils - Working Together

From: planningadmin@midsuffolk.gov.uk

From: RM Floods Planning
Sent: 20 January 2017 10:27
To: Planning Admin
Cc: Dylan Jones
Subject: 2017-01-17 JS Reply Ref 4963/16 Land west of Ixworth Road, Thurston IP31 3PB

Suffolk County Council, Flood and Water Management can make the following initial comment.

The FRA states in section 3.2 Flood History that "The only recorded incident of flooding in the local vicinity highlighted by the SFRA is groundwater flooding at Thurston Railway Station approximately 900 m south of the site."

Suffolk County Council as the local lead flood authority have a number of recorded flood incidents in the parish they ones closest to the proposed development site are on the Baron Rd/Old Norton Rd junction in April & May of 2016.

With regard to the design of the surface water drainage system, the system should be design not to increase flood risk off site (in all events up to 100 year return period); Provide adequate standards of flood protection on site - in most cases no flooding inside buildings in events up to a 100 year return period and no flooding in other areas (apart from designated flood paths /storage areas) in events up to 30 year return period.

Infiltration test, we note that TP9 and TP8 recorded results below 5mm/hr infiltration rate as such would be classed as a fail which is where the land allocated for the primary school is illustrated to be. TP6 & TP4 are just marginally acceptable. Otherwise the other trial pits recorded acceptable infiltration rates including TP7 which is where the attenuation basin/lagoon is illustrated to be located. However further tests at reserved matters should be undertaken to ensure that the infiltration rate for this proposed use of the site is acceptable.

Our preference would be for all private dwellings to drain to their own individual soakaways and that the remainder of the impermeable area drain to the basin/lagoon.

The FRA needs to be updated with a current surface water flood maps from the LLFA and should include a indicative surface water drainage plan as per our documentation list below.

| Pre-app | Outline | Full | Reserved Matters | Discharge of Conditions | Document Submitted |
|---------|---------|------|------------------|-------------------------|--|
| ✓ | ✓ | ✓ | | | 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 rd party agreement to discharge to their system (in principle/consent to discharge) |

| | | | | | |
|--|--|---|---|---|---|
| | | ✓ | | ✓ | Maintenance program and ongoing maintenance responsibilities |
| | | ✓ | ✓ | | Detailed development layout |
| | | ✓ | ✓ | ✓ | Detailed flood & drainage design drawings |
| | | ✓ | ✓ | ✓ | Full structural, hydraulic & ground investigations |
| | | ✓ | ✓ | ✓ | Geotechnical factual and interpretive reports, including Infiltration test results (BRE365) |
| | | ✓ | ✓ | ✓ | Detailed landscape details |
| | | ✓ | ✓ | ✓ | Discharge agreements (temporary & permanent) |
| | | ✓ | ✓ | ✓ | Development management & construction phasing plan |

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

From: Nathan Pittam
Sent: 27 January 2017 11:08
To: Planning Admin
Subject: 4963/16/OUT, EH - Land Contamination.

M3 : 188822

4963/16/OUT, EH - Land Contamination.

**Land to the west of, Ixworth Road, Thurston, BURY ST EDMUNDS, Suffolk.
Outline Planning Application sought for up to 250 new dwellings, open space
and associated infrastructure, up to 2.4Ha of land for Thurston Community
College, 2Ha of land for the provision of a new ...**

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that the applicant has submitted a Phase I and II investigation by Nott Group (ref. 72509/R/001) which provides an adequate overview of the contamination at the site. However the Nott Group concluded that there would need to be additional works following the removal of the harvest from the site to determine the scale of areas of made ground on the site. The initial report was dated May 2016 so hopefully the additional work would have been undertaken in Autumn last year. Could I request that this information be provided to us or failing that any permission that may be granted for the site is conditioned to ensure that the additional work recommended by the Nott Group report (ref 72509/R/001) are undertaken in full prior to development commencing at site.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715
m: 07769 566988
e: Nathan.pittam@babberghmidsuffolk.gov.uk
w: www.babergh.gov.uk www.midsuffolk.gov.uk

Resource Management
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Phillip Isbell
Corporate Manager - Development Manager
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

Enquiries to: Rachael Abraham
Direct Line: 01284 741232
Email: Rachael.abraham@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_4963
Date: 26 January 2017

For the Attention of Dylan Jones

Dear Mr Isbell

Planning Application 4963/16 – Land west of Ixworth Road, Thurston: Archaeology

This large development site in an area of archaeological potential recorded on the County Historic Environment Record (HER). A prehistoric flint working tool is recorded from within the site itself (THS 025) and a quantity of Neolithic finds were located during archaeological investigations to the south-west of the site. Iron Age finds and features are recorded to the north and south of the site (THS 001 and 004). A Roman road was also recorded during archaeological investigations to the south-west, along with a scatter of Roman pottery (THS 002) and a geophysical survey undertaken within the proposed development area has identified anomalies likely to represent the remains of the road passing through the site. The proposed development is also situated on the edge of Thurston Heath which is likely to have been a focus for early occupation. As a result of this potential, the large scale of the proposal and the fact that the site has been the subject of systematic archaeological investigation, there is a high probability of encountering archaeological remains at this location. The proposed works would cause significant ground disturbance that has potential to damage any archaeological deposits and below ground heritage assets that exist.

At pre-application stage, we advised that this site should be subject to trial trenched evaluation prior to the determination of any submitted applications, to accurately quantify the archaeological resource (both in quality and extent) which survives at the site and also to ground truth the geophysical survey results. However, we note that an outline application has been submitted for the site, which gives some flexibility in the final development design should significant archaeological remains be encountered at the site.

As a result, on balance, there are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be

the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation (a 4% sample of the full development area) will be required to establish the potential of the site, **before approval of layout and drainage under reserved matters**, and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation. **We would strongly advise that evaluation is undertaken at the earliest opportunity.**

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

RAMBLERS ASSOCIATION – BURY ST EDMUNDS GROUP

For the attention of Dylan Jones, Planning Services

Planning reference 4963/16

Outline planning application sought by Persimmon for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on Land West of Ixworth Road, Thurston.

We write to object to the proposed over development of this site which is grossly increased from the Neighbourhood Plan of 50 new dwellings at any one location in Thurston. The public right of way which links Ixworth Road to the East and Mill Lane to the west across the site and to the South will be adversely affected by the loss of open space and the amenity presently enjoyed by both local residents and other walkers alike. This public footpath is part of a well used network and gives easy access to the countryside around the village. This overdevelopment will alter the character of the north side of the village and diminish the enjoyment of a walk in the countryside.

Although we note that there will be a 2m wide footpath/cycleway created along Ixworth Road, this will result in the clearance of natural vegetation and trees and consequently this particular highway is going to be changed from a country road to a very busy thoroughfare, as it will be carrying traffic from the newly proposed Primary School, the new housing development and the Community College, as well as through traffic. Walkers will have to cross this road, which could present safety concerns at peak times. There also seems to be no provision of street lighting along this stretch of road, again a safety hazard.

There is a suggestion that direct vehicular access to the proposed Primary School could be taken from within the residential development (4.11) and not directly off Ixworth Road. This would definitely be a detrimental factor as it would cross the supposedly 'wildlife landscape' surrounding the public right of way as defined on the indicative masterplan.

We are also concerned about the closure of the right of way during construction, should the development go ahead, and would require assurance on this matter.

We would object most strongly if the route of the public right of way is moved from the line indicated on the masterplan. We would require it to remain on its current route on the southern boundary of the site and would not countenance it being diverted to a different route through the development.

We would also wish to have the opportunity to make further comments once the views of other consultees have been received.

Jenny Bradin

Group Footpaths Secretary

01/02/2017

From: Philippa Stroud
Sent: 02 February 2017 16:31
To: Planning Admln
Cc: Dylan Jones
Subject: 4963/16/OUT Land west of Ixworth Road, Thurston IP31 3PB - Other Issues

WK/188880

Ref: 4963/16/OUT EH – Other Issues

Location: Land west of Ixworth Road, Thurston IP31 3PB

Proposal: Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

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

Buildings at Mill Farm are approximately 115 metres from the closest part of the proposed site boundary. If these buildings were used for livestock then the occupiers of the proposed dwellings might experience a loss of amenity from odour, noise, flies etc. associated with their use.

I note there is a pumping station proposed in the south western part of the site. Could the applicant be asked to provide further details please, regarding its noise specification, mitigation measures etc., calculated to the nearest residential boundary and for us to be re-consulted when this information becomes available.

In the meantime, I would make the comment that the application site is in proximity 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 if planning permission is granted, 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

From: Christopher Fish

Sent: 02 February 2017 15:57

To: Dylan Jones

Cc: Steve Merry

Subject: FW: Consultation on Planning Application 4963/16 - Land west of Ixworth Road, Thurston IP31 3PB

Dylan,

I regret that I am not going to be able to respond as requested by today, partly because of an unusually high case load at present but also due to the need to assess the cumulative impacts of other pending applications. This work is ongoing and is being led by Steve Merry, Transport Policy & Development Manager for the area. I can confirm that I've spoken with the transport consultant for this development today and they are aware of this study. We should, of course, try to respond fully as soon as possible.

Regards,

Christopher Fish MEng IEng
Senior Development Management Engineer



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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk


Council's Reference: 4963/16

Referring to the planning application referenced above, dated 16 January 2017, application for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road, Thurston IP31 3PB, 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.¹

¹ Where relevant, further information will be provided within Annex A.

| | |
|---|-------------------------|
| Signature  | Date: 3 February 2017 |
| Name: David Abbott | Position: Asset Manager |
| Highways England: Woodlands, Manton Lane Bedford MK41 7LW | |
| david.abbott@highwaysengland.co.uk | |

NEIGHBOURHOOD PLAN TEAM

Parish Council Office
New Green Centre
New Green Avenue
Thurston
Suffolk
IP31 3TG
Tel: 01359 232854
e-mail: thurstonnpsg@hotmail.com



Councillor P Robinson
Chair of Thurston Planning Committee
Thurston Parish Council
New Green Centre
Thurston
IP31 3TG

Mr P Isbell
Corporate Manager, Development Manager
Mid Suffolk District Council
131 High Street
Needham Market
IP6 8DL

30th January 2017

Dear Cllr. Robinson,

Re: Planning Application 4963-16 – Outline Planning Application sought for up to 250 dwellings, open space and associated infrastructure, up to 2.4 hectare of land for Thurston Community College, 2 hectare of land for the provision of a new Primary School, including details of access on land west of Ixworth Road @ land west of Ixworth

Thank you for allowing the Neighbourhood Plan Team to comment on several planning applications that have been submitted to the Parish Council by a number of agents acting on behalf of Developers. The Neighbourhood Plan Team is aware that, with the submission of 6 applications (one is a duplicate) for a total of over 800 dwellings, Thurston is facing an immediate, exceptional planning issue. The Neighbourhood Plan Team is concerned that if the major applications now submitted are to be dealt with on an individual basis there will be a failure by the District Council to understand the cumulative impact such growth will have on the community of Thurston. It is also held that consideration of each individual planning application will not provide an appropriate response to the National Planning Policy Framework requirements nor to the impact on Thurston itself. It is for this very reason that the Neighbourhood Plan Team have concentrated their efforts at looking at the common issues facing each application as well as looking at the fundamental principle of development for each individual site and where provided, specifically the more detailed layout proposals and their impact given each location.

The Neighbourhood Plan Team would also like to state that in accordance with the Parish Council Protocol's for Pre Planning Application Developments – no comments on the suitability of the site for development or how the site performs in relation to others ahead of the site assessment work were made during the attendance of representatives from any of the Developers/Land Owners or their agents at Neighbourhood Plan Meetings and that whilst all applicants who attended such meetings had been informed that they could state that they had met with the Neighbourhood Plan Steering Group they could not in any forthcoming developer public meetings state that their proposals have in any way, shape or form, been endorsed by the Neighbourhood Planning Steering Group.

Whilst Thurston Parish Council is at a relatively advanced stage in preparing a Neighbourhood Plan and whilst the plan has not yet reached the final stage of allocating sites or proposing policies, following consultation with the public and land owners and agents on the site assessments carried out during Summer – Autumn 2016 it should be afforded some weight in responding to this application. The results of the site assessments as carried out under the Parish Housing Land Availability Assessment, has raised some issues which the Neighbourhood Plan Team feel are so major and fundamental that they must be taken into account by Mid Suffolk District Council in determining these applications.

A copy of all site assessment work can be seen within Thurston's Village website:

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

The Neighbourhood Plan Team would like to state that it is disappointed at the speed at which this and other applications have been submitted for new housing in the village. There seems to be a general haste to ensure that each development is the first to submit with little regard for the cumulative impact that each development will have on the general infrastructure of Thurston which requires time to evolve and time to absorb new residents and associated growth. There is a general concern that the size of new developments being proposed will result in Thurston losing its 'village feel' and for it to become 'a small town'.

The Neighbourhood Plan Team is also disappointed that despite reassurances from Mid Suffolk that work on its Local Plan is proceeding, there is still no information being released as to the expected housing growth in the area and that work on the Councils Housing needs (Objectively Assessed Needs) is ongoing.

Given the scale of proposed housing development, the Neighbourhood Plan Team would request that the District Council adopts a cohesive approach that looks at the totality of applications and their impact on all of Thurston's infrastructure and social development. As way of emphasis the following table demonstrates the applications that are facing Thurston:

| Owner/Builder | Planning Reference | Status of application | Description of development | Number of dwellings |
|---|--------------------|--|--|---------------------|
| Playdri Products, Granary Site, Station Road | 2430/08 | Outline granted. Phase 2 delayed. | Remainder of site with blocks of flats. | 92 |
| Playdri Products, Granary Site, Station Road | 3181/13 | Preliminary work started on phase 1 in 2016. | Single building commercial centre with 9 flats above | 9 |
| Bovis Homes, Barton Road | 4386/16 | No decision Comments closed | Purely residential | 138 |
| Hopkins Homes, Sandpit Lane | 2797/16 & 5010/16 | No decision No decision | Purely residential | 175 |
| Pigeon Developments, Norton Road | 5070/16 | No decision | Residential with 2 form entry primary school | 200 |
| Persimmon, Ixworth Road | 4963/16 | No decision | Residential with primary school (no size given) | 250 |
| Laurence Homes, Norton Road | 4942/16 | No decision | Purely residential | 64 |
| Possible number of dwellings to be added to Thurston | | | | 928 |

Regarding the common issues for all six applications submitted (4942/16; 4963/16; 5010/16; 5070/16; 4386/16 & 2797/16), the Neighbourhood Plan Team has broken these down into 4 main areas: Education; Housing and Transport and Social Challenges

- **Education:**
Currently primary education facilities are landlocked and full. Any future housing requires functioning primary education facilities before housing occupancy. The footpath and road network also needs substantial improvement to accommodate additional education provision. It is felt that multiple housing planning applications in Thurston demand a cohesive approach that looks at the totality of applications as well as individual consideration considering the impact of all of them on education and other infrastructure issues. In addition, Secondary students 11-16 currently attend Thurston Community College. Post 16 students are located in Beyton. It is understood that at some point in the future students may relocate to the Thurston site. Further secondary provision is available in both Ixworth and Bury St Edmunds. Suffolk County Council Education Department has indicated that were sufficient housing to be built in Thurston, Woolpit and Elmswell further secondary provision would be required somewhere along the A14 corridor.

Any significant housing would require additional primary education places. Suffolk County Council (letter from Peter Freer to Lisa Evans, MSDC) referring to Planning Application 2797/16 outlines its position:

'NPPF paragraph 72 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.'

'We currently forecast to have no surplus places at the catchment Primary School to accommodate children arising [from new developments], but there is some capacity at the Community College. The Primary School site is landlocked and cannot be expanded and the Community College has the largest secondary catchment in the County and is unlikely that expansion would be supported in the future.

'The County Council has been in discussions with the District 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.

'The anticipated approach to mitigate the impacts of housing growth in the area is to provide a new primary school which would incorporate the existing primary school. This new primary school would be constructed as a 315-place school initially, capable of being expanded to 420 places to meet future development. The estimated construction cost of a 420 place primary school is £6.9 million on a 2.2 hectare site.'

In addition, given capacity and legislative issues

'... the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 26 place setting, providing sufficient capacity for 52 children in total.'

The Thurston Neighbourhood Plan Team recognises and endorses the County Council position. New housing development on any scale in Thurston requires provision of a functioning primary school with early education places before the occupation of housing. There is no spare capacity in existing provision.

Any chosen location for a Primary School will have an impact on roads and footpaths in the village. There are major transport issues associated with the Community College. Over 25 coaches bring and take students to and from the College daily. The road network is under pressure; the coaches and parents' cars delivering and collecting students near the College create a daily problem. When there are parents' evenings, cars are parked inappropriately on footpaths, verges and close to road junctions.

In the current location, the Primary School presents associated pedestrian and vehicle concerns. In a new location, a larger school will bring added demands. Appropriate footways, road crossings, vehicle access (immediate and wider) and car parking will need to be accommodated. There is nowhere in Thurston that has current adequate provision to assimilate the pedestrian and vehicle movements particularly at the beginning and the end of the day in school term time.

- **Housing**

Thurston has received 5 planning applications over recent weeks from 5 separate developers. The total number of dwellings proposed by these applications amounts to 827 homes – which would result in approximately a 64% increase in the current total housing stock of Thurston. These figures do not include the 2 existing applications at the Granary which add a further 101 dwellings to the tally. Should all applications be approved, there is a concern that not only will the village infrastructure be insufficient to cope, but the whole nature and ambiance of Thurston will change from that of a large vibrant village to that of a faceless dormitory town. The determination of these applications should be viewed as a whole if the development within Thurston is to be sympathetic and sustainable. Considering each application individually has the potential to allow by default considerably more development than the village could cope with.

A break-down of housing types and numbers (where known) is provided below:

| Site | Land west of Ixworth Road 4963/16 | Land at Norton Road 5070/16 | Land at Meadow Lane 4942/16 | Land south of Norton Rd 2797/16 | Land west of Barton Rd 4386/16 | Land west of Ixworth Road 4963/16 | Land at Norton Road 5070/16 | Land at Meadow Lane 4942/16 | Land south of Norton Rd 2797/16 | Land west of Barton Rd 4386/16 | Land west of Ixworth Road 4963/16 | Land at Meadow Lane 4942/16 |
|---------------------------|-----------------------------------|-------------------------------|-----------------------------|---------------------------------|--------------------------------|-----------------------------------|---|-----------------------------|---------------------------------|--------------------------------|-----------------------------------|-----------------------------|
| Bedrooms | Market Housing | | | | | Affordable Housing | | | | | Intermediate/shared equily | |
| 1 | | 5 | | | | | | | | | 24 | appts |
| 2 | | 4 terraced 12 bungalows | 6 | | 4 bungalows | | 9 bungalows 5 appts | | | | 16 houses | |
| 3 | | 25 semis 26 detached | 13 | | 3 bungalows 22 houses | | 3 bungalows 5 appts 12 terraced | | | | 6 houses | |
| 4 | | 31 detached | 17 | | 46 houses | | 31 semis 5 detached | | | | 2 houses | |
| 5 | | 18 detached | 8 | | 13 houses 2 4/5 houses | | | | | | | |
| Self build | | 9 | | | | | | | | | | |
| Sub Total | 163 | 130 | 42 | 114 | 90 | 65 | 70 | 18 | 61 | 48 | 22 | 6 |
| Total | 539 | | | | | 280 | | | | | 28 | |
| Final total 827 dwellings | | | | | | | | | | | | |

NB: Types and numbers of dwellings are shown where they have been made available in the Planning Application.

Generally, all the proposed sites are situated on land currently used for agricultural purposes on the outer boundaries of the village. The Neighbourhood Plan Team having considered the agricultural classification of land upon which these sites are situated had been made aware that, based on the generalised 1:250000 maps, the best and most versatile land generally occurs to the north of the village. Whilst it is recognised that individual site classifications are usually fully determined following detailed field work, the Neighbourhood Plan Team is concerned that development is being proposed on the best and most versatile land. Furthermore, all of the sites that have been submitted under planning applications that have come forward, are situated outside the Settlement Boundary and face out onto open countryside. The visual impact of each proposed development on approaching the village will be significant and will have an impact on the existing character and appearance of the countryside.

In general, the sites are of a higher density than those in their immediate vicinity. The plans reflect housing more appropriate to an urban landscape rather than a rural village. Several of the proposals include 2.5 to 3-storey dwellings with ridge heights of up to 12m. No other housing of this type can be found nearby. All the sites have at least one boundary abutting existing bungalows, dormer bungalows or small cottages. The designs are therefore not in keeping with the scale, type or density of housing in their locality.

Feedback from the Neighbourhood Plan Survey indicates that residents accept the need for expansion but in a sympathetic and controlled manner in order that infrastructure can keep pace with demand. Furthermore, they expressed, inter alia, a desire for relatively small developments of up to 50 dwellings with open spaces which reflect those found in other parts of the village. The survey indicates that during the next 15 years, 47% of respondents would be looking for bungalow accommodation, 44% homes suitable for retirees and 17% for assisted living and care homes. The proposed plans do not reflect the residents' future needs and are not, therefore, considered to be sustainable. Neither do the applications reflect the continuing need for housing across all tenures and a growing need for affordable housing. The Ipswich Housing Market Area, Strategic Housing Market Assessment (SHMA) Document and 2014 Suffolk Housing Needs Survey all show that there is a high demand for smaller homes across all tenures

from those who maybe starting households to those who may be looking to downsize. The Enabling Housing Officer at Mid Suffolk in her response to Planning Application 4386/16 makes reference to the fact that affordability issues are the key driver for the increase in smaller homes and that there is a strong demand for one and two bedroom flats/apartments and houses.

The large number of dwellings proposed would result in a substantial increase in the number of motorized vehicles within the residential areas. The Neighbourhood Plan Team does not consider the plans take sufficient heed of on-site parking requirements. This failure will inevitably lead to overspill onto and congestion within adjacent roads.

- Transport

Thurston is situated inside a triangle of A roads, the base of which is the A14, the eastern side is the A1088 and the western side is the A143. The apex of the triangle is just north of Pakenham where the A1088 crosses the A143. There are no B roads inside this triangle. All the interior roads are just for local access and by-roads, which are not maintained by the council to a standard suitable for heavy traffic. Current potholes in some places are described as "a death trap for cyclists". Access to the A14 towards Bury St Edmunds is either via Fishwick Corner where Barton (New) Road makes a junction with Mount Road or via Pokeridge Corner at the junction of Beyton Road, Thedwastre Hill and Mount Road. These have already been found to be accident-prone congested junctions with current traffic flows. At the other end of Barton Road there is access to the A143 and this junction is also often congested and subject to accidents. All of the applications submitted fail to take into account the committed schemes within Bury St Edmunds, Ixworth and Stanton which will alter the traffic flows along these road networks.

The standard S2 single carriage way in each direction type of road, upon which the Transport Assessments base their computer models, is described as 7 m in width. The roads leading into and out of Thurston do not have consistent widths and can be as narrow as 4.3 m. Norton Road, Church Road and School Road have places, unencumbered by parked vehicles, where two cars cannot pass safely and vehicles have to draw right off the road if a bus or larger vehicle comes along. Furthermore the Grade II listed Railway Bridge on Barton Road warns high vehicles to drive in the middle of the narrow road to get through under the arch. While one footway varies in width from 1 m to only 0.7 m, the opposite one tapers to nothing at all. Currently there is only room for one way vehicle flow over the other railway bridge on Thedwastre Road and no safe footway for pedestrians, just a white line one metre from the wall. Thedwastre Road leads to the junction with Beyton Road where congestion in the morning is already well recorded.

The traffic in and around Thurston varies enormously depending on the time of day as the Community College, Beyton Sixth Form College and Ixworth Free School educate students from a wide area, with many students being carried in coaches twice a school day. Travelling through and to the Community College and the Village are Bus Routes TN112; TN114; TN118; TN120; TH140; TN144; TN161 and TN163. In the morning and afternoon 25+ coaches and numerous vehicles deliver and pickup students and have a negative impact on the flow of traffic along Norton Road, Barton Road and Station Hill. In the afternoon this congestion is more noticeable as the coaches arrive in 2 dedicated waves with early arrival by the second wave creating issues. Some routes have a note to coach drivers to approach the College via Station Road to avoid other blocks near the Post Office/village stores on Barton Road where there are usually cars parked, narrowing the road. Other buses, provide a service to Stowmarket to Bury St Edmunds via Beyton and a service from Stowmarket to Bury St Edmunds via Norton. Combined, these give an hourly service to people in Thurston in each direction throughout most of the day Monday to Saturday. The route in Thurston is via School Road, Church Road, Norton Road, Heath Road, Genesta Drive and Barton Road. This means that in addition to the school transport at peak times, buses are travelling through the village throughout the day. Furthermore on a Monday to Saturday there is a bus service to Diss which stops outside Thurston Community College at 0855 and arrives back in Thurston (opposite Community College) at 1605.

From Monday to Saturday, there are hourly train services in each direction throughout the day, generally at 29 minutes past the hour to Stowmarket and Ipswich (east), and 12 minutes to the hour to Bury St Edmunds and Cambridge (west), with variations in the evenings and early mornings. There are slightly fewer trains on Saturdays. On Sundays and Bank Holidays there is a two-hourly service, but there are alternative two-hourly services to Ipswich and Peterborough from Bury St Edmunds. The main drawback to train travel for future growth for those unable to walk to the station is that there are only 12 official parking places provided and these are filled very early in the day. Cyclists also have only 1 cycle rack to hold 4 cycles and a notice telling them that only the official rack may be used. Overflow parking up Station Hill already happens. The rest of the Granary site is the subject of development plans belonging to a private developer and there is no room for the provision of extra parking. Of significant concern to the Neighbourhood Plan Team is the necessity for passengers having to walk across two tracks which carry non-stop passenger and goods trains to access one of the platforms. Although there is a siren, the risk will be heightened the more footfall there is at the station. The Team is concerned that there are no plans to see improvements made to this station at a time when Network Rail are closing rural footpaths that

cross rail tracks due to the dangerous posed, and yet this dangerous crossing, which has to be used every day by many including schoolchildren, is deemed to be safe.

The Neighbourhood Plan Team is concerned that, having viewed the documents still available on Mid-Suffolk's District Planning site for the development at the Granary, no Transport Assessment can be found, although a commercial centre will involve delivery vehicles as well as visits from customers, besides the trips made by the cars and vans used by residents of the proposed 100 or so flats.

The more recent planning applications from agents acting on behalf of Bovis Homes, Hopkins Homes, Persimmon Homes and Pigeon Capital Management 2 Ltd include lengthy Travel Assessments. All state that they have examined the traffic flow at various key junctions in Thurston at AM and PM peak times and supply all their data and name the computer programs they have used to calculate capacity and degrees of congestion. It is noted that the Laurence Homes application for 64 homes is apparently a borderline size which may not need an assessment.

It is also stated in the assessments that the key junctions were decided on in pre-application consultations with Suffolk County Council. These were often examined by more than one developer however the Neighbourhood Plan Team is concerned that none of them examined the flow over the narrow one-carrageway railway bridge on Thedwastre Road and that not all of the applicants included within their crash assessments included Fishwick Corner which has a higher proportion of incidences than other areas quoted.

| Developer | Road | Junction | AM 2016 | PM 2016 | Accidents 2010-2014 | AM Future | PM Future |
|--|-------------|---|------------------|------------------|-----------------------|-------------|-------------|
| Pigeon Developments | Norton Road | Peak traffic | 160→ | 110← | | | |
| Bovis Homes | Barton Road | | A | A | | +29% | +29% |
| Pigeon Developments Hopkins Homes | | Norton Rd/ Church Rd/ Pakenham Rd | A | A | | A | A |
| Pigeon Developments Hopkins Homes | | Norton Rd/ Sandpit Lane/ Meadow Lane | A A | A A | | A A | A A |
| Pigeon Developments Persimmon Homes Bovis Homes Hopkins Homes | | Barton Rd/ Station Hill/ Mini Roundabout | A B A B | A A A B | 1 Slight 1 Serious | A A B | A A C |
| Pigeon Developments Hopkins Homes | | Beyton Rd/ Thedwastre Rd | D B | C A | | D D | C A |
| Pigeon Developments Persimmon Homes Bovis Homes | | Barton Rd/ Norton Rd | A A B | A A A | | A A B | A A A |
| Persimmon Homes | | Ixworth Rd/ Norton Rd | C | A | | C | B |
| Bovis Homes | | Barton Rd/ A143 | D | F | 5 Slight 1 Serious | F | F |
| Bovis Homes | | Barton Rd/ Beyton Rd | C | A | | D | C |
| Bovis Homes | | Barton Rd/ Pakenham Rd | B | A | | B | A |
| Bovis Homes | | Barton (New) Rd/ Mount Rd | D | B | 7 Slight 1 Serious | F | B |

Using the data provided in the various individual assessments which were undertaken on different dates, the two roads and most of the junctions were recorded in AM and PM as "A" which means Free Flow. "B" is Reasonably Unimpeded. "C" is Stable, "D" is Lightly Congested. "E" is Significantly Congested and "F" is Heavily Congested. The after-development estimates were taken to be in 2021 except Bovis Homes who used 2023. Where different arms of a junction had different levels of flow, the highest was recorded above. It is noted that these records show only a slight increase in congestion after the development has gone ahead. However none of these estimates of future traffic took the other proposed developments into consideration only "background growth" and again the Neighbourhood Plan Team is concerned at the cumulative impact all of the developments would have on the current infrastructure.

Currently, with none of these developments completed, the surveys showed congestion points for commuters leaving Thurston for the A14 and A143 at the edges of the village. Thedwastre Road has the one carriageway railway bridge and its junction with Beyton Road on the way to the A14 is shown already as lightly congested. This involves a long queue of vehicles every morning, Monday to Friday at the junction. The mini roundabout near the station is the most likely junction to become more congested when the Granary development, which has already been passed by the planners, is completed. Records indicate that there have already been accidents there. This route leads to the Grade II listed railway bridge where passage is narrow, the road surface is often flooded, the footways are too narrow to be safe and it is another route to the A14, via Mount Road with a junction that is already highly congested with a record of accidents. At the other end of Barton Road the junction with the A143 is already heavily congested and accident-prone.

The Neighbourhood Plan Team recognises that current guidelines on rural traffic in general and in particular TA23/81 which gives official advice on new road developments, emphasises that rural roads should not be planned to carry more than 75% of their capacity, whereas urban roads are acceptable at 85%. This recognises the difference in quality and ambience between rural and urban living. Urbanites may balance long queues of traffic at peak times against shorter routes to work and more amenities close at hand. Village dwellers know how to duck and weave round huge agricultural vehicles travelling along narrow and winding roads and they pull up and give way with a wave, but they don't expect to have urban conditions of continuous traffic flowing through the village, even if it is a smooth flow as judged by most of the assessments done for Thurston. Villagers expect clean air, the opportunity to cross roads on foot without a long wait and the chance to hear birds singing rather than the continuous drone of traffic.

The Neighbourhood Plan Team recognises that Paragraph 17 of the NPPF is given as the justification for planning applications to be accompanied by a Transport Plan as well as a Transport Assessment: "Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."

Following the recommendation by Suffolk County Council, Persimmon Homes, Bovis Homes, Pigeon Developments Ltd and Hopkins Homes have each prepared their Transport Plans. These plans emphasise the opportunities for using public transport, walking (up to 2 km) and cycling. Their aim is clearly to try and reduce the use of private cars, as the plans involve employing someone to monitor the use of private cars in and from the development over a period of five years or so. This would be an intrusion into the private lives of residents which they would have to pay for in the price of the development. The Cycle Trail 51 which is widely quoted is very misleading and should be noted that within the village there is only a short distance along Station Hill and across New Green where it is marked on the ground and separated from other traffic. Children would not be safe to follow it on their own as to access this separated route, they would need to travel along Norton Road and over the crossover close to the junction with Norton Road/Ixworth Road/Station Hill. It should also be noted that should cyclists wish to travel east up Station Hill from Barton Road there are no safe crossing points onto the cycle route and that to access this point, Station Hill would need to be crossed on a bend on a steep hill with poor visibility.

The Neighbourhood Plan Team is therefore concerned that although some of the new applications propose small improvements to footways, crossings, bus shelters and the 30 mile speed limit on Ixworth Road, none of them can substantially improve the key junctions or the railway bridges where conditions will inevitably get worse with any extra traffic. The road system in Thurston was crystallised over a hundred years ago, based on the movement of mainly agricultural vehicles in a rural environment. The borders and junctions of these roads and the railway bridges fitted the traffic flows of that time. In many cases the borders are now built up so that roads cannot be widened and certainly the railway bridges are immovable. Each of the proposed developments would inevitably add more traffic despite efforts to wean people away from driving their own vehicles.

- Social Challenges

The Neighbourhood Plan Team is aware that with all growth the village faces a number of challenges and that whilst there are policies in place to ensure all developments provides a safe community; protects the environment from adverse impacts; reduces the level of crime or overcomes the fear of crime and provides a safe and secure environment, often the social impact of such growth is overlooked.

As such the Team has drawn up a list of the social challenges that will take place in Thurston with an increase in its population, the findings of which are replicated in the table below:

| Pros of increase in population | Cons of increase in population |
|---|---|
| <p>A new purpose-built primary school, more suited to the 21st century, would contribute to the life of the village.</p> | <p>A larger school will support more housing, which Developers will capitalize on. It will trigger more planning applications with family homes. Suffolk County Council work on 25 primary pupils per 100 houses, so there will be many more children which will affect the social dynamics of the village. Pupils will need appropriate cycle ways and paths to get safely to school, as our current school children do. The possible sites for a new school do not lend themselves so easily to safe walking or cycling. This is unfortunate, as it is valuable time for social interaction of children and parents.</p> |
| <p>Clubs and organizations for all age ranges will have increased numbers and for some this will help their sustainability. This includes the library and churches</p> | <p>Newcomers to the village will put an extra strain on current organizations. If there are more problems with waiting lists it will give rise to bad feelings. Leaders will need support to ensure that they have enough resources to meet extra demands.</p> <p>The popular children's organizations of Brownies, Scouts and the ATC provide valuable social activities for the youth of the village. For the new children to feel welcome in Thurston and be able to have friendships outside school, it is vital that they are able to access such groups. Finding extra leaders and, possibly venues, will not be easy.</p> <p>The Cavendish Hall and New Green may be over-stretched, including their provision for parking. There will be many more demands on these venues with an increased number of young families.</p> <p>Sports clubs may need extra outdoor facilities. Footballers in the village have already highlighted the need for another pitch so this would be even more of a priority.</p> <p>There would be a rise in cycling on the primary traffic routes, which will also have an increase in vehicular movements, around the village for all age groups. A new larger primary school will increase the number of children cycling to school, but also those cycling as a leisure activity.</p> |
| <p>More residents would support a greater variety of leisure activities than are currently available in the village. Teenagers, particularly, could benefit from this and will find more support for a Skateboard Park.</p> | <p>Difficulties are as described above with leaders and venues.</p> |

| | |
|--|---|
| <p>A greater variety of shops and facilities would be supported, giving residents more choice of various facilities within the village. This could be helpful to elderly people who do not want to travel into town.</p> | <p>More shops and other facilities will change the village atmosphere to one of a small town.</p> <p>This will impact on the social dynamics of Thurston, which views itself very much as a village. Residents may resent the extra shops and facilities rather than welcome them. This will, again, give rise to bad feelings towards the new developments.</p> |
| <p>More residents would help to support and sustain bus and train services, which add to the choice of social activities outside the village.</p> | <p>The pressure on these services is expected to increase with additional use being promoted through each applicant's Travel Plan with the implementation of measures designed to promote sustainable travel. Young families may however travel by car which will see an increase on the current road infrastructure. Unless improvements are made to the car parking facilities at the Railway Station along with additional cycle facilities there will be a detrimental on surrounding residential areas</p> |
| <p>More pressure for a Doctor's surgery or Medical Centre.</p> | <p>Medical provision will be impacted within the health catchment area. Currently the nearest practice does not have sufficient capacity for additional growth resulting from further development. As currently stands NHS England is only looking for a Developer Contribution to increase capacity within the GP catchment area. This increase is unsustainable if all applications were to be determined favorably.</p> |
| <p>Additional footpaths and cycle-ways arising from the new developments would offer more variety of routes for walkers and cyclists. This would help all residents to achieve a healthy life style.</p> | <p>Thurston takes a pride in its footpaths and natural environment. This is the result of well-known residents promoting the paths and looking after its trees and wildlife. A larger population which suddenly arrived in the village would not be familiar with these values and this could also give rise to ill feeling towards newcomers. Such concerns include people not following the country code while walking in the countryside, leading to friction with the landowners. Others are that more dogs may cause problems by being off the lead, worrying live-stock, damaging crops and disturbing ground nesting birds. There is also the matter of dog-mess which is already a cause of irritation if not dealt with correctly.</p> <p>The Suffolk Wildlife reserve at Grove Farm is situated within the Parish of Thurston where walkers can see different habitats, flora and fauna. The reserve can be part of a pleasant destination for leisurely walks and cycle rides. With an increasing population and more visitors, it will be necessary to ensure it is not at risk</p> |

As stated previously whilst the Neighbourhood Plan has not yet reached the stage of allocating sites or proposing policies, it has followed a period of extensive consultation with the public and land owners and agents on the site assessments carried out during Summer - Autumn 2016 following the Neighbourhood Plan Team's Call for Sites of January 2016, under the Parish Housing Land Availability Assessment. Throughout this process of consultation, further constraints to development have arisen which the Neighbourhood Plan Team feel are so major and fundamental as to back-up the original overall assessment of this site as being 'strongly negative'.

Overall the Neighbourhood Plan Team would ask the Parish Council to consider its concerns for this application on this site for the following reasons:

- The site has only one vehicular entrance onto Ixworth Road for potentially 250 dwellings with associated localised traffic, which is narrow and at points unsuitable for a main access route to both the housing and proposed Primary School and current Secondary School access points. The proposal also includes a pedestrian link to a footpath leading to Mill Lane and another emergency access point onto Mill Lane

which would be restricted to a footway and cycle path under normal conditions. Furthermore the plans are unclear as to how access will be gained to the Primary School as initially they showing two access points from Ixworth Road (In and Out) but further on there is the suggestion that this could be changed to access from an internal road to avoid parking congestion on Ixworth Road. The preferred choice should be made clear, so that informed comments can be made.

- Ixworth Road is locally acknowledged as having poor vision of oncoming vehicles towards Thurston due to a blind bend which is much more pronounced than appears in the sketch plan of the site, 03 Sketch Block Plan. Planning permission to complete the development of Cedar Close was held up for a period of time due to worries over visibility at the entrance. The access points on Ixworth Road to the proposed primary school are right in this area. Vehicles coming out of the residential part of the site would also add to difficulties at the Cedar Close entrance, where development is now almost complete.
- parking provision for both Primary School and Secondary School is inadequate and will fail to alleviate the current parking problems at the Secondary School.
- road safety with emphasis on the junctions of Norton Road and Ixworth Road which is very close to the Community College at the AM and PM peak times.
- Further road safety issues with emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pokeridge Corner
- Impact of traffic movements on neighbouring parishes e.g. Great Barton and Beyton for those accessing work and leisure facilities
- Location of Primary School entrance and its proximity to the commencement of the 30mph speed limit
- although it is acknowledged that there will be a wide/enlarged path for those accessing the proposed primary school, there is still concern for pedestrian safety at the junctions of Norton Road and Ixworth Road for those accessing village facilities as there are no safe crossing points
- development inappropriate to that of land abutting the countryside
- impact on village infrastructure particularly health provision
- type and density of housing mix not in accordance with the Neighbourhood Plan findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people.
- cost of affordable homes for local residents – the application fails to take into account the District Wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

In summary, whilst the Neighbourhood Plan Team recognises the need for future development to take place within Thurston and acknowledges the need for a new Primary School, it does not support the application in its present guise for the concerns outlined above. Furthermore, whilst recognition is given to the ability to have an all through school site, there is a need for further investment in highways, road and traffic calming schemes to ensure that such a proposal provides a safe and secure environment for all.

Moreover, given the scale of proposed housing development, the Neighbourhood Plan Team would ask that the Parish Council requests that the District Council adopts a cohesive approach that looks at the totality of the applications submitted and their impact on all of Thurston's infrastructure and social development.

Yours faithfully,

Victoria S Waples

Victoria S Waples, BA (Hons), CiLCA
Secretary to Thurston Neighbourhood Plan Team

Your ref: 4963/16
Our ref: 00032802
Date: 07 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Dylan,

Re: Thurston, Land west of Ixworth Road - Outline Planning Applications sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School

There are now five live applications for planning permission on sites in Thurston. In view of these applications which add up to over 800 dwellings it is clear that the County Council needs to consider the cumulative impact implications on highways and education infrastructure in the locality.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC

From: Peter Freer

Sent: 07 February 2017 .15:26

To: Planning Admin

Cc: Neil McManus; Philip Isbell; Christine Thurlow

Subject: Thurston, Land west of Ixworth Road - Outline Planning Application sought for up to 250 new dwellings - 00032802 - 4963/16

FAO Dylan Jones

Dear Dylan,

Please find attached Suffolk County Council's response to the above application where we will need to further consider the cumulative impact implications of development in this locality.

Kind regards,

Peter

Peter Freer MSc MRTPI

Senior Planning and Infrastructure Officer

Planning Section

Strategic Development – Resource Management

Suffolk County Council | 5th Floor | Endeavour House | 8 Russell Road | Ipswich |

IP1 2BX

From: RM PROW Planning
Sent: 13 February 2017 11:47
To: Planning Admin
Cc: Claire Dickson; aimee.fowler@bldwells.co.uk
Subject: RE: Consultation on Planning Application 4963/16

Our Ref: W523/018/ROW972/16

For The Attention of: Dylan Jones

Public Rights of Way Response

Thank you for your consultation concerning the above application, sorry for our late response.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Public Footpath 18 is recorded through the proposed development area.

We do not have **any objection** to this proposal and request the following condition is implemented.

Condition: The applicant/agent must ensure any proposed hedging/vegetation alongside the public footpath is set back a clear 1m from the edge of PROW, which has legal width of 1m. The hedging/vegetation must not encroach onto the PROW and will be the responsibility of the occupant/owner to maintain.

Reason: In the interests of the amenity of the public; the full legal width of the Public Right of Way must be kept clear of the hedging/vegetation so as to not obstruct the PROW.

Informative Notes:

Please note that the granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates.


Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. In order to avoid delays with the application this should be considered at an early opportunity.



The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team.

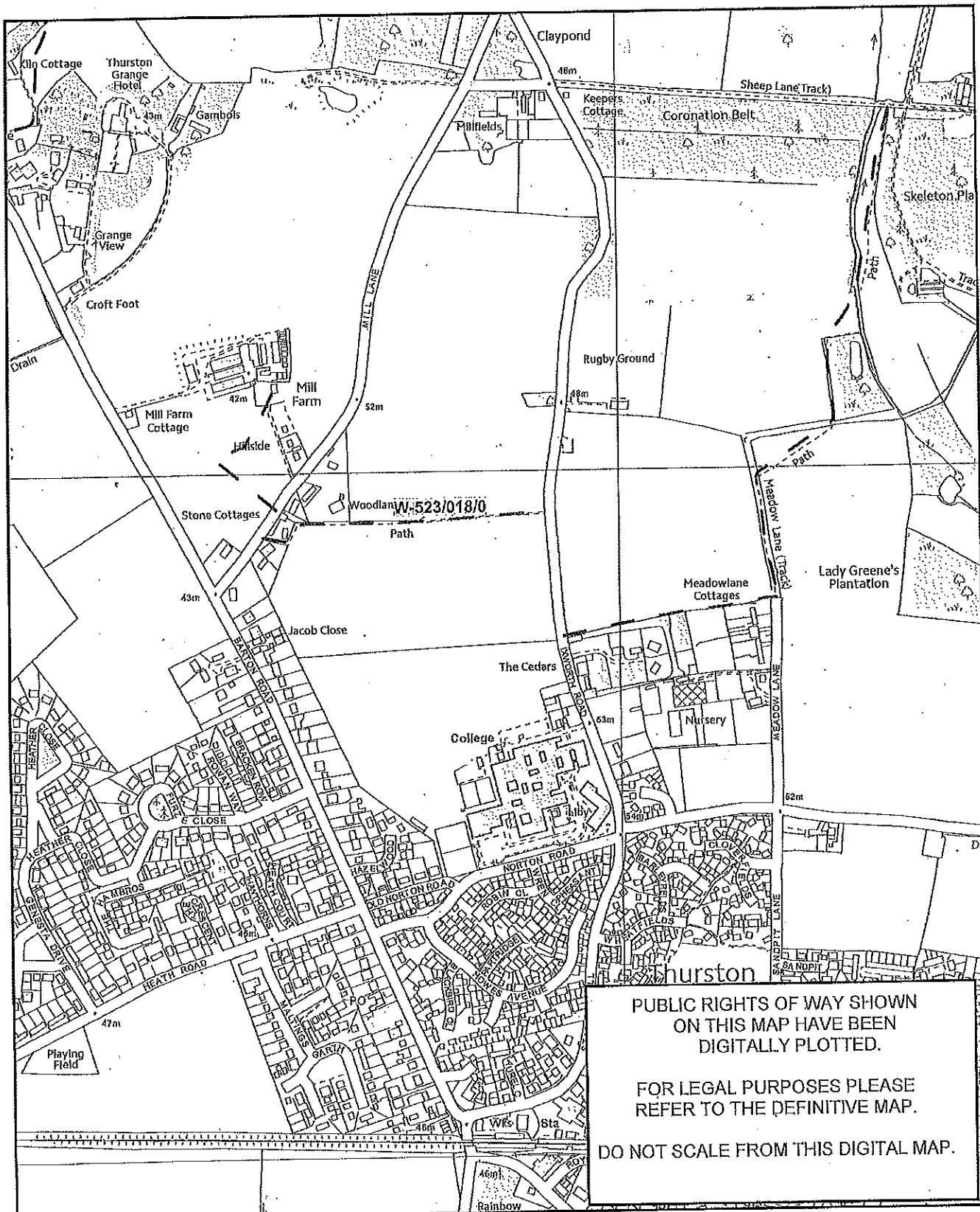
Nothing in this decision notice shall be taken as granting consent for alterations to Public Rights of Way without the due legal process being followed. Details of the process can be obtained from the Rights of Way & Access Team.

"Public Rights of Way Planning Application Response - Applicant Responsibility" is attached for the applicant.

Regards

Jackie Gillis
Green Access Officer
Access Development Team
Rights of Way and Access
Resource Management, Suffolk County Council
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX
 <http://www.suffolkpublicrightsofway.org.uk/> | [Report A Public Right of Way Problem Here](#)

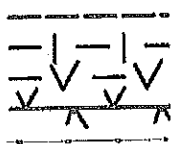
For great ideas on visiting Suffolk's countryside visit www.discoversuffolk.org.uk |  



4963/16 Land west of Ixworth Road, Thurston
Public Footpath 18



Resource Management
Endeavour House, 8 Russell Road, Ipswich, Suffolk. IP1 2BX



Ordnance Survey MasterMap

Public Footpath
Bridleway
Restricted Byway
Byway
Definitive Map Parish Boundary

Scale 1:7500



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Date: 13/02/2017

From: Linda Harley [mailto:harley.parish@btinternet.com]
Sent: 14 February 2017 14:43
To: Planning Admin
Subject: Response to planning application

Gt Barton Parish Council objects to the following planning application for the reasons given below:

Land West of Ixworth Road, Thurston - 4963/16

Gt Barton uses the services available in Thurston and will be directly and adversely impacted upon by any pressures on local facilities as a result of this and other proposals in the village. The Parish Council remains concerned about the cumulative impact of these proposals for residential development in Thurston and expects the LPA to fully consider this before determining this proposal. They are especially concerned about the impact of additional traffic on the Bunbury Crossroads and expects the LPA to ensure that this impact is properly assessed and considered. This crossroads is already congested and requires urgent work to address existing capacity and road safety issues. Committed development in the local area is yet to be delivered and will exacerbate these existing issues. These committed proposals must be taken into account alongside the impact of this and other proposals, in Thurston.

Furthermore, the proposed education provision as part of this proposal does not include any commitment from the education providers and as such the impact of this proposal on education provision is unclear.

Gt Barton Parish Council notes that the infrastructure improvements could be funded through the CIL payments liable for this site. They expect the LPA to ensure that projects are already in place to receive this funding and so ensure that infrastructure impacts are appropriately mitigated. If this cannot be confirmed, we expect the LPA to seek infrastructure improvements via other sources, e.g. S106 obligation.

Linda

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



Consultation Response Pro forma

| | | | |
|----------|---|---|-----------------------------|
| 1 | Application Number | 4963/16 Ixworth Road, Thurston | |
| 2 | Date of Response | 17.2.17 | |
| 3 | Responding Officer | Name: | Paul Harrison |
| | | Job Title: | Heritage and Design Officer |
| | | Responding on behalf of... | Heritage |
| 4 | Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | <ol style="list-style-type: none"> 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because it would erode the rural setting of the listed farmhouse; the level of harm is considered low. 2. The Heritage Team recommends that in accordance with NPPF, the low harm should be weighed against any public benefits of the scheme, which may include meeting housing provision targets and economic stimulus. | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | <p>The site is an area of undeveloped agricultural land between Mill Lane and Ixworth Road to the north of Thurston Community College. To the west of Mill Lane stands Mill Farmhouse, listed grade II. Mill Lane is lined on the east by detached dwellings reaching just beyond the access to Mill Farmhouse. Three further detached dwellings stand along the farm access, almost joining the farmhouse to the settlement with continuous development. The farmhouse itself is somewhat secluded by trees and other planting, with an extensive range of farm-buildings of industrial character to its north.</p> <p>Surrounding agricultural land will always make a considerable contribution to the appreciation of the significance of a historic farmhouse. In the case of Mill Farmhouse, this contribution is compromised by the modern farm-buildings and the modern residential development which almost reaches its door.</p> <p>The proposal would extend built development further along Mill Lane, although in a limited degree of arc in relation to remaining farmland. In this sense the proposal would represent some degree of harm to the setting of the listed farmhouse. However, in the light of the existing compromises to the building's setting, and the remaining extent of farmland around the farmhouse, the level of harm is considered low.</p> <p>The NPPF expects great weight to be given to the</p> | |

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.

| | | |
|---|--|---|
| | | conservation of designated heritage assets and their settings; any harm requires clear and convincing justification, and should be outweighed by public benefits. |
| 6 | Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate | |
| 7 | Recommended conditions | |

Please note that this form can be submitted electronically on the Council's 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 Council's website and available to view by the public.

PARISH COUNCIL

Comments from: Thurston Parish Clerk

Planning Officer: Dylan Jones

Application Number: 4963 / 16

Proposal: Outline Planning Applicationsought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

Location: Land west of Ixworth Road, Thurston IP31 3PB

PLEASE SET OUT ANY COMMENTS AND OBSERVATIONS OF YOUR COUNCIL WITH REGARD TO THE ABOVE, BEARING IN MIND THE POLICIES MENTIONED IN THE ACCOMPANYING LETTER.

The Parish Council, having considered this proposal, would like to register its objection to the application and asks that the attached letter be read as explaining the reasons behind its objection.

For Planning Applications only

Support

Object

No Comments

..... Mrs V S Waples (Print Name)

on behalf of Thurston town/parish council

Dated..... 14.02.2017

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

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



SENT AS AN E-MAIL

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

February 14th 2017

Dear Mr. Isbell,

Proposal: Planning Application 4963-17 – Outline Planning Permission sought for up to 250 dwellings, open space and associated infrastructure, up to 2.4HA of land for Thurston Community College, 2ha of land for the provision of a new primary school, including details of access on land west of Ixworth Road, Thurston

Case Officer: Dylan Jones

The Parish Council wishes to place on record that it objects to this proposal in its current form and that the proposal is considered not to form a sustainable development within the dimensions set out in the NPPF.

The following reasons should be considered and form the basis for the objection:

The site and surrounding area are within the countryside and significantly 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. At this point development of the site would significantly change the character of the village which is currently rural and would therefore not only be contrary to GP1 – Design and Layout of Development but also be contrary to csfr-fc2 provision and distribution of housing and cor2 development in the countryside and countryside villages. The setting of a large development to the north of the village in an area where there are currently very few dwellings; no street lights or signage or no pathways will not only fail to maintain and/or enhance the character and appearance of the surrounding area but will also fail to respect the scale and density of surrounding development.

Such a development 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 and that the application, if approved will fail to consider the loss of permanent pastureland, will fail to protect the wildlife habitats at this point in the village and will be contrary to policy CL8 – protecting Wildlife Habitats.

The Parish Council therefore holds that the application submitted is not 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. The proposed development is situated in an area that has significant links with the wider countryside and a well-used footpath network and the Parish Council is concerned and echoes the concern raised by the Bury St Edmunds Ramblers Association that the public right of way linking Ixworth Road to Mill Lane will be “adversely affected by the loss of open space and the amenity presently enjoyed by both local residents and other walkers alike. This public footpath is part of a well-used network and gives easy access to the countryside around the village. This overdevelopment will alter the character of the north side of the village and diminish the enjoyment of a walk in the countryside”.

The Parish Council feels that the application fails to consider policy cor9 (cs9 density and mix) and fails to demonstrate that it has achieved a mix of house types, sizes and affordability to cater for accommodation needs. Furthermore, the Parish Council is concerned that the Masterplan is an unimaginative off the shelf design and that it fails to show any respect for the fact that it will abut countryside on all sides. It was felt that the masterplan was more in-keeping with an urban edge of town design than that which would reflect the rural state of Thurston as a village. The Parish Council does not consider 3 storey dwellings to be in-keeping with the general characteristic of a rural village. Whilst it is acknowledged that Policy CS9 recognises that housing sites may range from town to village, all applications for housing should be expected to respect the traditional form of development rather than follow a standardised suburban form of development. The Parish Council is concerned that the application submitted fails to show that it has considered the current mix of housing within the village of Thurston and that it fails to have taken account of the findings of tenure type and mix within the Neighbourhood Plan consultations, nor the findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people. The Parish Council is also concerned that the application fails to take significant regard for the District wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

The Parish Council would also recommend that Highways be consulted as to the suitability of the location of the site; the access roads leading to the development; pedestrian safety with regards to access to the site and significant crossing points within the village. Of significant concern is the one single access off Ixworth Road which is a rural road unsuitable for the increase in traffic that will be generated. It is also noted that there is to be an emergency exit/entrance off Mill Lane. The Parish Council is concerned that the application fails to take account of the Suffolk Design Guide (para 3.13.2) which states that “if a site is approached from a small land or street than the scale of any new road and hence scale of development should reflect this... sites for development should be broken down into smaller residential neighbourhoods to minimize the use of Local Distributor Roads”. The Parish Council considers that the application fails to consider the current road infrastructure and the fact that the secondary emergency access is to be off a single carriageway country lane (Mill Road).

The Parish Council would like reassurance that Suffolk Fire and Rescue are consulted on the risk of obstruction of not only the single access but also the feasibility of having an emergency access from a single carriageway.

The Parish Council is concerned at the proposal, as stated in the Residential Travel Plan, to have a direct vehicular access to the primary school land for pupils and parents from within the residential area, not directly off Ixworth Road. It is stated that the aim would be to insulate Ixworth Road against school drop off/pick up and to serve to deter local parents from off-site making short trips to/from the school by car. The Parish Council feels that the proposal to access the primary school from within the confines of the development will be unsustainable in ensuring that the area is safe for all to use. The Parish Council furthermore has concerns over the single access being proposed from Ixworth Road and feels that this also 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 ambulances and finally other motor vehicles.

The Parish Council notes that within the Residential Travel Plan it is stated that 'the extension of the 30mph speed limit is proposed in conjunction with the proposed development to cover the entire Ixworth Road frontage of the scheme and up to the existing Rugby Club'. It is noted that the County Council has a 'speed limit policy' and the Parish Council would have concerns as to whether any assurances could be had that a revision to the 30mph speed limit would be agreed.

It is also felt that the development would not support the transition to a low carbon future and 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.

Furthermore, the Parish Council is concerned at the impact that will be had by the location of a site for 250 houses and a 420+ pupil primary school with regards to road safety. The increased traffic that this development will produce will have a detrimental impact on Ixworth Road and it is felt that insufficient detail has been given to ensure that, with reference to NPPF paragraph 32 'safe and suitable access can be achieved for all people.' The Parish Council would ask that Highways be asked to comment on the suitability of two site entrances situated close to one another. The Parish Council is concerned that very little assessment has been carried out on the impact of vehicular movements on the entrance and that consideration should be given to the dangers associated with vehicular and pedestrian movements close to the single entrance to the proposed primary school.

The Parish Council is also concerned 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). The Parish Council feels that given the remote location of the site, a reliance on the private motor car will be generated in order to access amenities and services within the village which will also be contrary to the sustainability objectives of Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012) and the NPPF paragraphs 14, 17, 55 and 56 and will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway

bridge crossings on Barton Road, the Priority System on Thedwastre Road; junction of A143 at Thurston Road, Great Barton and entry and exit points onto the A14.

Of equal concern, are the drainage issues at Ixworth Road and Old Norton Road. Whilst the former is acknowledged within the planning application submitted, the Parish Council is concerned that there are no solutions as to how to deal with the issue of water volumes due to the hard surfacing that will arise from the development of this site. The Parish Council has had considerable communication with Suffolk County Council over several recorded flood incidents close to the proposed site on Barton Road and Old Norton Road. The Parish Council would like to see some mitigation as to the problems that currently arise with water flow and that the surface water drainage system should be so designed to ensure that properties surrounding the development site are not impacted. It is further noted that RM Floods Planning has also stated that infiltration tests where the land allocated for the primary school is illustrated to be are just marginally acceptable. The Parish Council feels that 'marginally acceptable' requires further analysis and expects that this will be taken on board.

The Parish Council, until the Order for the Neighbourhood Plan is laid, is expected to respond to current planning applications in line with policies set out in the Mid Suffolk Local Plan. It is recognised and understood that, 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 and apart from one very small corner, cannot be acknowledged to be adjacent.

The Parish Council 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 Meeting held to discuss this application amongst others as well as those 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. The Parish Council has received correspondence from the Neighbourhood Plan Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that they are to be included within its submission. It is known that that letter was submitted to the Planning Department at Mid Suffolk on 3rd February and its contents should be taken as being fully endorsed by the Parish Council.

The Parish Council would further wish to reiterate the concerns of the Thurston Neighbourhood Plan Team with regards to the speed at which this and other applications have been submitted for new housing in the village. It is recognised within the village that as a Key Service Centre the village of Thurston will appeal to developers and that a certain amount of growth is desirable and non-objectionable, however the Parish Council is concerned that piecemeal development will have a negative impact on the current infrastructure and that there should be a strict control over new housing proposals and the associated numbers until the general infrastructure of Thurston and the surrounding areas has been given time to absorb new residents and the impacts that this associated growth will have on a rural village.

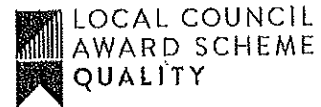
As such, the Parish Council formally requests that there is a change to the process and approach undertaken by the District Council in dealing with this and the other significant planning applications before it and that they are considered in a holistic manner with the impact from all development being considered once a thorough and engaging review has been undertaken with all the service providers to include NHS England; Education, Highways and Transportation Providers.

As confirmation, whilst the Parish Council recognises from conversations held with SCC Educational and Infrastructure Officers that a new primary school is required prior to any further growth within Thurston, it does not support the current application that has been submitted for this site. It is felt that the proposal for a primary school and 250 dwellings will intrude into an area of currently open, undeveloped, countryside resulting in an encroachment of built development extending significantly beyond the settlement boundary of Thurston.

Yours sincerely,

Victoria S Waples

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



Your ref: 4963/16
Our ref: Thurston – land west of
Ixworth Road 00032802
Date: 20 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Dylan,

Thurston: land west of Ixworth Road – developer contributions

I refer to the outline planning application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £54,000 towards libraries provision.

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. The County Council's view is that appropriate mitigation from each of the 'live' planning applications should 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 in which planning obligations are sought by Suffolk County Council 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 123 Infrastructure 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 250 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 seen as 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 21 January 2016 and started charging CIL on planning permissions granted from 11 April 2016. Mid Suffolk are required by Regulation 123 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 adopted 123 list.

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

- 1. Education.** NPPF paragraph 72 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 | Capacity | | | Actual/Forecast Pupil Numbers | | | | | |
|--|-------------|-------------|---------|-------------------------------|--------------|--------------|--------------|--------------|--------------|
| | Remaining | 95% | empties | Total | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 |
| Thurston CE Academy | 210 | 200 | | 200 | 196 | 211 | 212 | 208 | 208 |
| Ixworth Free School (11 - 16) | 697 | 687 | 0 | 567 | 271 | 300 | 342 | 350 | 344 |
| Thurston Community College (11 - 16) | 1500 | 1425 | 0 | 1,425 | 1,581 | 1,599 | 1,585 | 1,547 | 1,547 |
| 11-16 total places | 2097 | 1992 | | 1992 | 1,832 | 1,898 | 1,927 | 1,897 | 1,891 |
| Thurston Community College (with Sixth Form) | 1940 | 1,843 | 0 | 1,843 | 1,828 | 1,849 | 1,882 | 1,872 | 1,868 |

| School level | Minimum pupil yield | Required |
|---------------------------------|---------------------|----------|
| Primary school age range, 5-11: | 62 | 62 |
| High school age range, 11-16: | 44 | 0 |
| Sixth school age range, 16+: | 9 | 0 |

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 a number of 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 seen as a far from ideal strategy and should only be considered for a very temporary period because there are a number of 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.

Regarding out of catchment schools, major studies have shown that each transfer can result in a 6 month dip in standards as a minimum. 40% will eventually recover but 12% of pupils suffer long term negative effects. 2-tier pupils always out-performed 3-tier pupils at GCSE in the past and whilst the additional transfer

isn't the only reason it does have a negative effect.

The Policy Development Panel for School Organisation Review recommended at the start that any proposal should:

- 1) Ensure a single line of accountability for each key stage and
- 2) Minimise the number of points of transfer from one school to another within the statutory age range

This was the reason why the final decision was made to close the middle schools.

In addition to the above a lot of work is involved in transferring a pupil cohort from one school to another. There's the preparation and handover of pupil records to ensure the new school is made aware of each child's history, progress, health, needs and other agencies' involvement etc... to ensure continuity of their learning. There's also the pastoral care of all children so they feel comfortable with the change. Vulnerable and looked after children and those with SEN and behaviour difficulties and their parents have to be supported particularly sensitively and this could involve anything from regular visits to the school to staff working across the two schools for a period of time.

Due to the current uncertainty over the scale, location and distribution of housing growth in the Thurston locality it is not clear at this point in time 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 50 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 250 dwellings it is forecast that 62 primary age pupils will arise
- Therefore 62 pupils x £16,429 per place = **£1,018,598 (2016/17 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 62 places x £1,294 per place = **£80,228**. However as this proposed development, if granted planning permission, will include a fully serviced site for the new primary school which is to be transferred to Suffolk County Council, this will result in the payment of a maximum contribution to the applicant of £100,000 per acre less the proportionate land contribution cost of £80,228 directly arising from this proposed development.

It is proposed that the school site can be separately accessed and serviced directly off Ixworth Road, so that the school delivery is not dependent on the housing delivery. An important issue to resolve will be delivering sustainable and safe walking & cycling routes to the new school. In this respect further discussions are needed regarding the delivery of a new footway/cycleway on Thurston Community College land along Ixworth Road to directly serve the primary school site and housing site.

In addition the freehold of 2.4 hectares of land is to be transferred for £1 to SCC for the benefit of Thurston Community College.

At present two planning applications (under references 5070/16 and this one 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 is allowed to 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 or not to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would have limited powers to impose this on them. Iain Maxwell (Assistant Senior Infrastructure Officer in SCC's, Children and Young People Service) met with the Head teacher and 3 Governors on Thursday 26th January 2017 to explain the situation. Although there were reservations from the school the overall response was to accept in principle the installation of the temporary classroom if it was needed, providing there was evidence that the new school would be built and

open in the early stages of the housing developments to minimise the length of time the temporary building would remain on site. Formal acceptance in writing from the school has now been received.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction commencing on the new school early on. The costs between renting and buying are comparative. Should developers prefer to rent and pay for installation and removal costs this is acceptable to SCC, and an ongoing rental charge/obligation can be included in the Section 106 agreement. At this stage SCC doesn't know how many additional houses the District Council or Parish Council anticipates for the village or when they will be occupied, but we do know the school cannot cope without this double mobile. Even then this will only accommodate 60 pupils, i.e. approximately 240 dwellings and there are more than this number in the current undetermined applications for planning permission. The District Council will need to consider whether a planning condition to restrict occupation until permanent primary education provision is available locally that is an acceptable solution to support further development once the temporary provision places are used up by additional development.

The proportionate temporary accommodation contribution is calculated as follows:

- Cost of a temporary accommodation £250,000
- Cost per place = £250,000/60 = £4,167
- Primary age pupils arising from this site is 62
- Proportionate contribution towards temporary classroom is 62 pupils x £4,167 per place = £250,000 (maximum cost)

The temporary classroom cost of £250k will be apportioned across all developments that secure planning permission, based on dwelling occupations/pupils arising from each scheme up to the maximum of £250k/60 pupils. The planning obligation will need to be worded in such a way for each scheme that the maximum they will pay will be based on total pupils arising and/or limited to the 60 places. In theory the 5 schemes could proportionately split the £250k cost but have a dwelling occupancy restriction once the 60 places have been used up; or any combination of circumstances which may arise.

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 is in the process of being analysed, but the initial view is that in due course 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.** Education for early years should be considered as part of addressing the requirements of 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. The Childcare Act in Section 7 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 Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

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 250 dwellings, the County Council anticipates around 25 pre-school pupils eligible for funded early education. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 25 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 250 dwellings there is the need for 25 additional places
- Therefore 25 pupils x £8,333 per place = **£208,325 (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.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and 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 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Steve Merry/Christopher Fish of Suffolk County Highway Network Management.

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

5. **Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, 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 Mid Suffolk housing team to identify local housing needs.

6. **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:

"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 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.

- 7. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provide support and advice on their installation.

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

- 8. Superfast broadband.** 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 impacting 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.

9. 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.

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

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Strategic Development – Resource Management

cc Neil McManus, SCC
Iain Maxwell, SCC
Peter Robinson, Chairman - Thurston Parish Council
Christine Thurlow, MSDC
Steve Merry, SCC



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

Suffolk Wildlife Trust
Brooke House
Ashbocking
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IP6 9JY

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suffolkwildlifetrust.org

20/02/2017

Dear Dylan,

RE: 4963/16 Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for new Primary School, Inc. details of access. Land west of Ixworth Road, Thurston, IP31 3PB

Thank you for sending us details of this application, we have the following comments:

We have read the ecological survey report (Enims, March 2016) and we note the findings of the consultant.

Although no skylarks were recorded nesting on the site at the time of the ecological survey, this was carried out early in the season for this species. Dependent on the crop rotation, the application site is likely to provide suitable nesting habitat for skylark in some years. Loss of this site to development would therefore remove this nesting resource from that available in the area. Skylark are a UK and Suffolk Priority species and are on the 'Red' list of Birds of Conservation Concern (BoCC) due to population declines.

Compensation for the loss of suitable nesting habitat for this species must therefore be sought as part of this proposal. We would recommend that this is in the form of skylark plots (meeting the specification set out in Countryside Stewardship option AB4) on nearby arable land, these should be secured for a minimum of 10 years.

We note the consultant has recommended a sympathetic lighting scheme during construction. It is important that all retained and new habitat features are not impacted on by light spill from external lighting and that dark corridors are retained around the site for foraging and commuting bats. We recommend that Suffolk County Council's street lighting strategy is used as a basis for long term street lighting layout and design, alongside the recommendations made in the ecological survey report.

We note areas have been designated as green space with the provision of Sustainable Urban Drainage Systems, woodland and landscaping belts. We query how these areas will be managed to maximise their biodiversity value in the long term?

Notwithstanding the above, should development at this site be considered acceptable, we request that the recommendations made within the report are implemented in full, via a condition of planning consent. We also request that any development secures appropriate ecological enhancements as part of its design. This could include (but not be limited to) integrated nesting opportunities for birds such as swifts and house sparrows; integrated roosting opportunities for bats and hedgehog friendly garden boundaries.

A company limited by
guarantee no 695346
Registered charity no 262777

Living Landscapes Living Gardens Living Seas

As this is an outline planning application, should consent be granted it must be ensured that any future reserved matters applications are informed by suitably up to date ecological information.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

Jill Crighton
Conservation Planner

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



21 February 2017

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

By email only

Dear Dylan

Application: 4963/16

Location: Land west of Ixworth Road, Thurston IP31 3PB

Proposal: Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

Thank you for consulting Place Services on the above application.

Holding objection: There is insufficient ecological information available to understand the likely impacts of development on Priority species, particularly skylarks.

The Preliminary Ecological Appraisal (PEA) (enims, March 2016) states that: *"During the field survey skylark was observed flying above the application site."*

As it is possible that skylark territories may be lost, and no further surveys recommended nor mitigation offered eg offsite nest plots on nearby arable land, a clarification of the likelihood of impact is required.

However the PEA also included the statement that;

"Due to the relatively small size of the development and the presence of these common habitat types in the surrounding landscape, the loss of these habitats from within the site, are not anticipated to affect the conservation status of these species beyond the context of the site"

All likely impacts on Priority species need to be considered (not just significant ones) so there is therefore a gap in information which needs to be filled before determination of this application.

This additional information is necessary to confirm the likely impacts on skylarks, and that any necessary mitigation measures have been secured eg 2 nest plots per pair of skylarks displaced or disturbed.

I look forward to working with the LPA and the applicant to provide the missing information to remove my holding objection. 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
07809 314447

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.

Our Ref: 570/CON/4963/16
Date: 3rd April 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

NAME Mr Sperrin

ADDRESS Persimmon Homes Ltd
Persimmon House
Colville Road Works
Lowestoft
NR33 9QS

Dear Mr Sperrin

Interim Reply to Planning Application 4963/16 for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

This letter is complimentary to that ref 570/CON/4963/16 dated 10th March 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. This letter details those additional issues which the Highways Authority has identified which are specific to this application.

Site Access

The proposed 2.4 x 59m visibility splays are not acceptable with current derestricted speed limit. The speed data presented in Transport Assessment states that the 85thile speeds are 46.1mph northbound and 40.9mph southbound. This would require 160m visibility splays. No swept path assessment has been provided to indicate that large vehicles can access and exit the junctions. Junctions, including those to the proposed primary school site shall be no closer than 50m apart. All junctions should provide pedestrian access and suitable crossing facilities.

The developer has proposed to extend the 30mph speed limit to Rugby Club. This would allow a reduction of the visibility splays but unless measures are in place to present an environment where the speed limit is self-enforcing an 85thile speed of 37mph should be assumed resulting in a 90m visibility (DMRB). It is considered that Manual for Streets guidance for visibility would only be applicable if the environment on Ixworth Road is modified to recreate a built rather than rural environment and hence modify driver behaviour. Note that until changes to the speed limit can be implemented the designer should assume the current measured speed data for design purposes. To implement a reduction of speed limit a legal process must be followed during which formal objections can be made that can result in the proposals being withdrawn.

The proposed emergency access via Mill Lane is acceptable provided;

- the length of the main access between Ixworth Road and the beginning of the loop road is kept to a minimum,
- details of the junction layout including swept path analysis show that this access is practical with regard to the narrow width of Mill lane,
- the emergency access is designed to be of a suitable width with features to effectively deter use by non-authorised vehicles while allowing pedestrian and cycle use.

Internal Highway layout

A carriageway width of 5.5m would be acceptable for the main access road. Details of the footway layout and shared space design will be required.

Footway and cycle connectivity

The proposal of a footway along the western side of Ixworth Road between Norton Road and the Rugby Club is welcomed. Confirmation is required that provision of the footway will not reduce the carriageway on Ixworth Road to an unacceptable width.

To improve pedestrian connectivity a pedestrian crossing should be provided at the junction of Ixworth Road, Station Hill and Norton Road.

An uncontrolled crossing should be provided to link the new footway alongside Ixworth Road to the PRoW Thurston 001 opposite.

The proposed footway as detailed includes provision of root barriers and 'no dig' construction. These are regarded as indicative and details will be agreed as part of the S278 approval process.

Public Rights of Way (PRoW)

Changes 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. Some of the footways shown on drawing 03 Sketch Block Plan are within the existing or proposed adoptable highway and as such do not require PRoW status.

Car parking

Although details are not provided it is stated in the Transport Assessment that this will comply with SCC guidance.

Road Safety

The Transport Assessment does not refer to the cluster of crashes at the junction of C693 Thurston Road / C692 Thurston Road / C693 New Road. However, this has been addressed in the letter regarding the cumulative effects of the developments in Thurston.

Landscaping

When considering the masterplan for full planning application the developer should note the Highway Authority's preference for trees to be planted in public open space rather than adjacent to adoptable highways (including footways)

Transport Assessment and Local Highway Infrastructure

The trip rates calculated for this development are 0.568 (am peak) and 0.528 (pm peak). These are lower than adjacent developments in Thurston and surrounding villages but considered acceptable due to the proportion of affordable houses.

The TA does not address cumulative impact of other sites and does not include A143 Gt Barton and C693 Thurston Road / C692 Thurston Road / C693 New Road junction, which have been identified in other Transport Assessments as junctions that will receive additional traffic from this development and will then exceed theoretical capacity.

Proposed S278 works

- Footway on west side between Norton Road and Persimmon site and beyond to the Thurston Rugby Club

Proposed S106 Heads of Terms

- Improvements to PRow Thurston 001 between Meadow Lane and Ixworth Road
- Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction
- Contribution towards improvements at the A143 Bury Road / C691 Thurston Road / C649 Brand Road, junction at Great Barton
- Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road
- Contribution towards 40mph speed limit on the C692 Thurston Road as part of the above safety improvements
- Extension of the 30mph speed limit to Thurston Rugby Club

The S278 and 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.

Yours sincerely,



Steve Merry
Transport Policy and Development Manger
Resource Management

Sent: 25 April 2017 16:26
To: Dylan Jones
Subject: RE: Planning applications for 872 houses in Thurston

Dear Dylan, thank you for your enquiry. Of the 6 applications we only responded to 5070/16, the remaining applications had no environmental constraints in our remit.

Flood risk

None of the sites are in areas at risk of fluvial flooding. The assessment of risk of flooding from surface water is a matter for the lead local flood authority; Suffolk County Council.

Foul water disposal

According to our records there should be sufficient headroom within the Thurston Water Recycling Centre permitted Dry Water Flow to accommodate all 827 dwellings. It is important, however, that you consult Anglian Water as they are the only ones that can confirm whether the local foul sewers have sufficient hydraulic capacity.

The developers of each individual site should already have approached AWS with a Pre-development Enquiry. However, depending on the timing of those enquiries they may not have considered the cumulative impacts.

Water supply

Thurston lies in an area of water stress. Our standard water resources comments for this situation are below:

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

The development lies within the area traditionally supplied by Anglian Water Services Ltd. It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. You should seek advice from the water company to find out if this is the case, or a new source needs to be developed or a new abstraction licence is sought. We may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.

THE LOCATION OF DEVELOPMENT SHOULD TAKE INTO CONSIDERATION THE RELATIVE AVAILABILITY OF EXISTING DEVELOPED WATER RESOURCES

The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.

EVERY OPPORTUNITY SHOULD BE TAKEN TO BUILD WATER EFFICIENCY INTO NEW DEVELOPMENTS, AND INNOVATIVE APPROACHES SHOULD BE ENCOURAGED.

We support all initiatives aimed at reducing water use. The extent of water efficiency measures adopted will affect the demand for water for the development and we would expect that this will be taken into consideration. It is assumed that new houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. We support greywater recycling as it has the potential to reduce water consumption in the average household by up to 35% if achieved in a safe and hygienic manner.

It is the responsibility of the applicant to ensure that no local water features (including streams, ponds, lakes, ditches or drains) are detrimentally affected, this includes both licensed and unlicensed abstractions.

If the proposal requires an abstraction licence, it is recommended that the applicant contact our permitting centre. Depending on water resources availability a licence may not be able to be granted.

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

External 02 03 02 58389

Mobile 07845 875238

graham.steel@environment-agency.gov.uk

<https://www.gov.uk/government/organisations/environment-agency>

<https://www.gov.uk/flood-risk-assessment-for-planning-applications>

<https://www.gov.uk/flood-risk-assessment-local-planning-authorities>

Iceni House, Cobham Road, Ipswich, IP3 9JD

MID SUFFOLK DISTRICT COUNCIL

TO: Dylan Jones – Senior Planning Officer

From: Julie Abbey-Taylor, Professional Lead – Housing Enabling

Date: 15th May 2017

SUBJECT: Residential Development at land west of Ixworth Road, Thurston for 250 dwellings application No. M/4963/16.

Consultation Response on Affordable Housing Requirement

Key Points

1. Background Information:

- A development of 250 dwellings.
- This development triggers Local Plan Amended Policy H4 and therefore up to 35% affordable housing would be required on this site.
- Based on 250 dwellings 87 units of affordable housing would be sought. 87 affordable units have been included in the Design and Access statement submitted by Persimmon Homes.

2. Housing Need Information:

2.1 The Babergh and Mid Suffolk District Strategic Housing Market Assessment confirms a continuing need for housing across all tenures and a growing need for affordable housing. The most recent update of the Strategic Housing Market Assessment, completed in 2012 confirms **a minimum need of 134 affordable homes per annum.**

2.2 The most recent version of the SHMA specifies an affordable housing mix equating to 41% for 1 bed units, 40% 2 bed units, 16% 3 bed units and 3% 4+ bed units. Actual delivery requested will reflect management practicalities and existing stock in the local area, together with local housing needs data and requirements.

2.3 The Council's Choice Based Lettings system currently has circa. 980 applicants registered for the Mid Suffolk area.

2.4 At February 2017 the Housing Register had 19 applicants registered specifically for housing in Thurston and 17 of these had a local connection to the village. However as this is a planning gain site, it would be required to meet district wide need so the **980** figure is the one to be applied in this case.

2.5. It is considered good practice not to develop a large number of affordable dwellings in one location within a scheme and therefore it is recommended that no more than 15 affordable dwellings should be located in any one part of the development.

2.6. Our 2014 Housing Needs Survey shows that there is a need across all tenures for smaller units of accommodation, which includes accommodation suitable for older people, wishing to downsize from larger privately owned family housing, into smaller privately owned apartments, bungalows and houses.

2.7 It would also be appropriate for any open market apartments and smaller houses on the site to be designed and developed to Lifetime-Homes standards, making these attractive and appropriate for older people.

3. Affordable Housing Requirement for Thurston:

| | |
|---|--|
| Affordable Housing Requirement | 35 % of units = 87 affordable units |
| Tenure Split – 60% Rent & 40 % Intermediate e.g. New Build Homebuy accommodation, intermediate rent, shared ownership or starter homes. | Affordable Rent = 53 units All rented units will be let as Affordable Rent Tenancies Intermediate = Shared Ownership = 24 units Intermediate = Starter Homes = 13 units |
| Detailed Breakdown Rented Units | General Needs Affordable Dwellings: <ul style="list-style-type: none"> • 6 x 1B 2P houses @ 58 sqm • 6 x 1B 2P flats @ 50 sqm • 6 x 2B 4P flats @ 70 sqm • 4 x 2B 3P Bungalows @ 63 sqm • 22 x 2B 4P Houses @ 79 sqm • 7 x 3B 5P Houses @ 93 sqm • 2 x 3B6P Houses @ 102 sqm <p>Total = 53 ART's</p> |
| Detailed Breakdown Intermediate Units | General Needs Shared Ownership dwellings: <ul style="list-style-type: none"> • 4 x 2B 4P flats @ 70 sqm • 14 x 2B 4P Houses @ 79 sqm • 6 x 3B 5P Houses @ 93 sqm <p>Total = 24</p> <p>Starter Home Dwellings: -</p> <ul style="list-style-type: none"> • 4 x 2B4P flats @ 70sqm • 9 x 2B4P houses @ 76 sqm |
| Other requirements | Properties must be built to current Homes and Communities Agency Design and Quality Standards and be to Lifetimes Homes standards. |

| | |
|--|--|
| | <p>The council is granted 100% nomination rights to all the affordable units on first lets and at least 75% on relets.</p> |
| | <p>The Shared Ownership properties must have a 80% staircasing bar, to ensure they are available to successive occupiers as affordable housing in perpetuity.</p> |
| | <p>The Council will not support a bid for Homes & Communities Agency grant funding on the affordable homes delivered as part of an open market development. Therefore the affordable units on that part of the site must be delivered grant free.</p> <p>The affordable units delivered on the local needs part of the site will need further consideration regarding any grant application to the HCA and a support for grant cannot be guaranteed in this instance. It is recommended that RP partners consider this matter carefully.</p> |
| | <p>The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice.</p> <p>On larger sites the affordable housing should not be placed in groups of more than 15 units.</p> |
| | <p>Adequate parking provision is made for the affordable housing units</p> |
| | <p>It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see www.midsuffolk.gov.uk under Housing and affordable housing for full details.</p> |

Julie Abbey-Taylor, Professional Lead – Housing Enabling.

Our Ref: 570/CON/4963/16
Date: 8th June 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 for up to 250 new dwellings, open space and associated infrastructure, up to 2.4HA of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, 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 E 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 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
- l) 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 D 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 D.

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 £86155 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 on the application.

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:

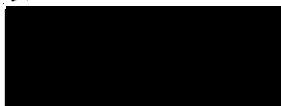
- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

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

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



1 June 2017

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

By email only

Dear Dylan

Application: 4963/16

Location: Land west of Ixworth Road, Thurston IP31 3PB

Proposal: Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

Thank you for re-consulting Place Services on the above application.

No objection subject to securing mitigation and enhancement measures

Subsequent to receiving further information on skylarks (indicative plan of suitable arable land available within the applicant's control), I am now satisfied that there is sufficient ecological information available to understand the likely impacts of development on Priority species, particularly skylarks.

I recommend that mitigation & enhancement measures are required to make this proposal acceptable to enable the LPA to demonstrate its compliance with its statutory biodiversity duty under s40 NERC Act 2006.

Recommendations

The mitigation measures identified in the Preliminary Ecological Assessment report and Ecological Constraints and Opportunities Plan EN097-01-ECOP (both enims, March 2016) together with a skylark mitigation scheme should be secured and implemented in full. This is necessary to conserve and enhance Protected and Priority Species particularly reptiles and breeding birds including skylarks.

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 therefore a condition of any planning consent:

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



"All ecological mitigation & enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Assessment report Ecological Constraints and Opportunities Plan EN097-01-ECOP (both enlms, March 2016) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason: The applicant has provided sufficient information 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 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
07809 314447

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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1 June 2017

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

By email only

Dear Dylan

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Location: Land west of Ixworth Road, Thurston IP31 3PB

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Reason: The applicant has provided sufficient information 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)

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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
07809 314447

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.

Our Ref: 570/CON/4963/16
Date: 8th June 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

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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 E 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 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 D 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 D.

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 £86155 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 on the application.

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:

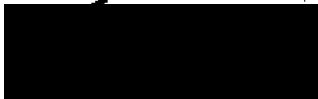
- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

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

From: Khan Wasil [mailto:Wasil.Khan@networkrail.co.uk] **On Behalf Of** Town Planning SE
Sent: 03 May 2017 11:56
To: Planning Admin
Cc: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / (anglia)

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application 5070/16 and offering us the opportunity to comment.

We have reviewed the application above and assessed the further combined developments which include the below planning applications.

- 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH – 175 dwellings
- 4963/16 / Land west of Ixworth Road, Thurston IP31 3PB – 250 dwellings
- 4942/16 / Land at Meadow Lane, Thurston IP31 3QG – 64 dwellings
- 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT – 138 dwellings
- 5070/16 - Land at Norton Road, Thurston – 200 dwellings

We note the five submitted developments have a total residential occupancy of approximately 827 units.

It should be noted that Network Rail's strategy is to close level crossings wherever possible as this removes any interface where a person or vehicle could be struck by a train. Therefore the major concern for Network Rail in relation to these proposals, is the Barrow level Crossing at Thurston Station. Historically we have seen a number of issues at this crossing and cannot accept additional impact and further usage unless mitigation and measures are introduced; therefore the preferred option in this location would be to close the level crossing.



The safety justification for closure of the crossing is set out below:

Thurston station level crossing is a footpath crossing with miniature warning lights located at the end of the platforms at Thurston. The crossing traverses two lines and is 8.9m in length, equating to a user requirement of 11.35 seconds to traverse the crossing, with a required sighting distance of 381m, of which there is currently insufficient sighting but this is mitigated by the miniature warning lights.

Trains run frequently over the crossing with approximately 124 trains running at up to 75mph for 24 hours per day with stopping and non-stopping trains.

Particular factors have to be considered for the safety of those using the crossing. Network Rail has a standard Risk Assessment tool called ALCRM (All Level Crossing Risk Model), which determines the predictive level of risk at a level crossing based on a variety of factors, including misuse, train information, number of users, the environment, available sighting etc. Based on the information entered, ALCRM calculates the risk score which generates an individual risk to a user (A to M) and a collective risk (1 to 13) with A and 1 being the highest calculated risk.

Within these risk bands, ALCRM also calculates a Fatality & Weighted Injuries (FWI) score. When the last ALCRM assessment was undertaken in July 2015, Thurston level crossing's risk score was calculated as 0.001924552 (D4), which is outside of ALCRM's high risk categories.

The proposed residential development will see the usage at this crossing increase to a greater level and therefore mitigation options to decrease the risk will need to be explored in order for Network Rail to support the planning application.

Without definitive numbers, the increase in pedestrian footfall has been modelled in ALCRM as follows:

- 75 Pedestrians per day: D4 with a FWI of 0.001924552 (Last census)
- 120 Pedestrians per day: D4 with a FWI of 0.003079283
- 150 Pedestrians per day: D4 with a FWI of 0.003849104
- 200 Pedestrians per day: D3 with a FWI of 0.005132138

As you can see the FWI rises, with 200 pedestrians a day this would move the crossing into a High risk category. Currently a new risk assessment is being carried out and from a safety perspective if the development were to be approved then the level crossing will see a significant increase in pedestrian usage (currently 75 users per day). In all of the aforementioned pedestrian scenarios, there would be a marked increase in the risk profile at this level crossing which would therefore be unacceptable.

Given the increase in risk and increased usage at the station, we believe the development will have a severe effect on safety unless mitigation measures are introduced and contributions are provided in order to fund the closure of the crossing. The measures required to close the crossing are outlined in the attached feasibility report. In light of the 5 applications coming forward, we believe the only fair and reasonable solution would be for the applicants to share the cost of the crossing closure. The cost of the closure is estimated to be £1million, which equates to £1209.19 per dwelling.

Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied by the amount of dwellings which are permitted, to enable the closure of the level crossing.

Reason: To ensure safe and suitable access can be provided in accordance with Paragraph 32 of the NPPF.

Kind Regards,

Wasil Khan
Town Planning Technician, Property

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1 Eversholt Street
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E: Wasil.khan@networkrail.co.uk
www.networkrail.co.uk/property



From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]
Sent: 06 April 2017 15:10
To: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Land at Norton Road, Thurston

Proposal: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us

within 14 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are GP1; NPPF, SC4, Cor4, RT12, CL8, C01/03, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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Agenda Item 7c

Committee Report

Committee Date: 12th July 2017

Item No:

Reference: 5070/16

Case Officer: Dylan Jones

Description of Development: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self-build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

Location: Land at Norton Road, Thurston

Parish: Thurston

Ward: Thurston & Hessett

Ward Members: Councillors Esther Jewson & Derrick Haley

Site Area: 18.1

Conservation Area: No

Listed Building: Manor Farm – Grade 2*, converted Manor Farm Barns - Grade 2, Church of St Peter Grade 2 – These are all buildings in the surrounding locality.

Received: 22/12/2016

Expiry Date: 30/06/2017

Application Type: Outline Planning Permission

Development Type: Largescale Major Dwellings

Environmental Impact Assessment: Schedule 2 development – EIA not required.

Applicant: Pigeon Capital Management 2 Ltd and Mr Peter Hay

Agent: Beacon Planning Ltd

DOCUMENTS SUBMITTED FOR CONSIDERATION

The defined Red Line Plan for this application is drawing number 016-032-002 received on the 22nd December 2016. This drawing is the red line plan that shall be referred to as the defined application site. Any other drawings approved or refused that may show any alternative red line plan separately or as part of any other submitted document have not been accepted on the basis of defining the application site.

Submitted Documents:

Illustrative masterplan – 016– 032–001 B received on 09/05/2017

Existing site levels – 016-032-003 received on 22/12/2016

Affordable housing layout - 016-032-004 B received on 09/05/2017
Parameters plan - 016-032-005 B received on 09/05/2017
Street elevations plan - 016-032-006 received on 22/12/2016
Access options plan - 016-032-007 received on 22/12/2016
Bungalow plan – 016-032-008 received on 09/05/2017
Landscape masterplan – 1892 01 Rev C received on 24/05/17
Existing site plan – 5802 – D received on 22/12/2016
Proposed site access - 618212/SK02 Rev E received on 09/05/2017
Western junction swept path analysis – 618212/SK04 Rev C received on 09/05/2017
Eastern junction swept path analysis - 618212/SK05 Rev c received on 09/05/2017
Eastern access road swept path analysis - 618212/SK09 Rev B received on 09/05/2017
Norton Road access drawing – 618212/SK11 Rev B received on 09/05/2017
Access Road forward visibility splay - 618212/SK12 Rev C received on 09/05/2017
Eastern access road junction visibility splay - 618212/SK13 Rev C received on 09/05/2017
Eastern access road junction visibility splay - 618212/SK14 Rev C received on 09/05/2017
Western access road junction visibility splay - 618212/SK15 Rev C received on 09/05/2017
Highway swept path analysis - 618212/SK16 Rev A received on 09/05/2017
Western access road junction visibility splay - 618212/SK17 Rev A received on 09/05/2017
Western access road junction visibility splay - 618212/SK18 Rev A received on 09/05/2017
Archaeology and geophysical report received on 22/12/2016
Design and Access Statement received on 22/12/2016
Ecological appraisal received on 22/12/2016
Flood risk assessment and drainage strategy reference number 618211-REP-CIV-FRA Rev3 received on 24/05/17
Heritage statement received on 22/12/2016
Landscape and visual impact assessment received on 22/12/2016
Statement of community consultation received on 22/12/2016
Sustainability statement received on 22/12/2016
Transport plan received on 22/12/2016
Tree Survey and constraints plan received on 22/12/2016
Transport Assessment received on 22/12/2016
Contaminated land report received on 22/12/2016
Attenuation basis risk assessment report received on 08/03/2016
Landscape masterplan reference number 1892 01 Rev C received on 24/05/2017

The application, plans and documents submitted by the Applicant can be viewed online at www.midsuffolk.gov.uk via the following link:
<http://planningpages.midsuffolk.gov.uk/online-applications/simpleSearchResults.do;jsessionid=21B48B527E2BD08F40E75921C01A51A8?action=firstPage>.

Alternatively, a copy is available to view at the Mid Suffolk and Babergh District Council Offices.

SUMMARY

The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. The scheme is contrary to the adopted Mid Suffolk Core Strategy; however, the Council cannot demonstrate

a 5 year supply of housing and the scheme falls to be considered under paragraph 14 of the NPPF where the adverse impacts of the scheme have to be balanced against the benefits of the scheme to demonstrate that it constitutes sustainable development. Officers are recommending a minded approval of this application as it is considered to be sustainable development as the as the significant public benefits that the scheme will deliver (contributions towards a new school, pre-school, highway improvements, health provision, affordable housing and library facilities amongst others) are considered to outweigh the negative aspects of the proposal.

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason:

- It is a “Major” application for residential land allocation for 15 or over dwellings.

PART TWO – APPLICATION BACKGROUND

1. This section details history, policies, advice provided, other legalisation and events that forms the background in terms of both material considerations and procedural background.

History

2. The planning history relevant to the application site is listed below. A detailed assessment of the planning history including any material Planning Appeals will be carried out as needed in Part Three:

There is no relevant planning history for this site.

3. The following applications are also considered to be relevant to the consideration of this proposal as they represent the other major applications for residential development in Thurston that are currently with the Council for consideration:

2797/16 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane. The applicant is Hopkins Homes and this proposal is identical to appeal 5010/16.

4386/16 Full planning application for the erection of 138 dwellings on land on the west side of Barton Road, Thurston. The applicant is Bovis Homes.

4942/16 Full planning application for the erection of 64 dwellings on land at Meadow Lane, Thurston. The applicant is Laurence Homes.

4963/16 Outline application for the erection of up to 250 dwellings and associated infrastructure including the provision of up to 2.4ha of land for use by the Thurston Community College and the provision of land for a new primary school on land west of Ixworth Road, Thurston. The applicant is Persimmon Homes.

5010/16 Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road (This case is at appeal for non-determination in the statutory period of 13 weeks for a major application). The appellant is Hopkins Homes and this proposal is identical to application 2797/16.

4. **The consideration of the cumulative infrastructure issues that this group of applications present has been explored in a collaborative, but without prejudice, working group including County and District Council Officers with the five respective applicants and their technical advisers. This has enabled a constructive and timetabled analysis of the proposals and their cumulative impact.**

Details of Previous Committee / Resolutions

5. None

Details of Member site visit

6. Members visited Thurston on the 13th June to look at this site and the four other residential development schemes that are currently with the Council for consideration.

Details of any Pre Application Advice

7. The applicant engaged with the Council and received pre-application advice on the principle of the development and its acceptability having regards to the fact that the Council does not have a 5 year supply of housing.

PART THREE – ASSESSMENT OF APPLICATION

8. Summary of Consultations

Thurston Parish Council (which includes the comments of the Thurston Neighbourhood Plan Team) – Strongly objects to the scheme on the following grounds:

The following points which have been raised by the Neighbourhood Plans team relate to the

impact of all 5 applications (and appeal) currently with the Council for residential development in Thurston:

- Thurston is to face an unprecedented level of growth due to the submission of 6 planning applications proposing over 800 houses between them.
- The 6 applications need to be considered on a cumulative basis as failure by the District Council to do so would result in the individual schemes having a significant impact on the local community and it wouldn't meet the requirements of the NPPF.
- Consider that the Neighbourhood Plan should be given some weight in the consideration of this proposal as it has been the subject of public consultation despite not allocating sites or proposing planning policies.
- The speed of the submission of the applications in Thurston and the amount of dwellings proposed between the five undetermined applications and the Granary site will result in Thurston losing its 'village feel' and for it to become 'a small dormitory town'.
- The cumulative impact of the scheme needs to be considered in the light of the 101 residences (92 dwellings and one block of flats incorporating 9 units) already granted at the Granary site.
- The current primary school is at capacity and it is landlocked and cannot be extended. Any additional houses would need additional primary school places. Agree with the County Council's stance that a new primary school is required and it should be provided before the dwellings are occupied. However, a new school causes its own infrastructure issues and there is nowhere in Thurston that has current adequate provision to assimilate the pedestrian and vehicle movements particularly at the beginning and at the end of the day in school term.
- Development is proposed on the best and most versatile agricultural land on the northern part of the village.
- The density of all of the schemes is too high and they reflect urban type development rather than what you would expect in a village.
- The local community would prefer to see schemes of no greater than 50 dwellings being built with more open space around them. They would also like to see more bungalow developments which the developers are not providing. There should also be more one and two bedroom flats/apartments and houses in the schemes.
- Thurston is accessed by a network of A roads and country lanes which are not well maintained by the County Council and are not of a design or standard to accommodate increased growth in Thurston and also that planned in the surrounding villages and in Bury St Edmunds.
- Congestion of the local highway network already exists and these schemes will make the situation worse and will cause more accidents to occur at key sites which already experience accidents in the village.
- There are no plans by network rail to improve the station at Thurston and this will cause capacity, parking and safety issues.
- The number of dwellings proposed cumulatively will cause social impacts for the local community. These have been split in a pros and cons list as below:

| Positive | Negative |
|--|--|
| <ul style="list-style-type: none"> • New purpose built school more attuned to 21st Century needs. • Improved facilities and to allow more clubs and organisations to increase will increase their sustainability. • More residents in the locality | <ul style="list-style-type: none"> • A new school would potentially trigger more new houses in the future which would change the social dynamics of the village. • New cycle and walking routes to the new school would have to be created as they don't |

| | |
|--|---|
| would help to support a greater variety of leisure facilities in the village. | <p>exist at present.</p> <ul style="list-style-type: none"> Newcomers to the village will put pressure on current organisations in the village will not be able to expand to meet this increased demand. |
| <ul style="list-style-type: none"> A greater variety of shops and facilities would be supported. | <ul style="list-style-type: none"> More shops and facilities will change the character of the village into a small town and local residents will resent this change and the new developments that have caused this change to happen. |
| <ul style="list-style-type: none"> More residents will sustain bus and train services in the locality. | <ul style="list-style-type: none"> More residents will increase pressure on the network which cannot be met unless improvements are made to the railway station car park. |
| <ul style="list-style-type: none"> More pressure for a medical surgery. | <ul style="list-style-type: none"> The nearest practice doesn't have capacity and all that is being asked through this and the other schemes is a contribution towards health care which will make the service unsustainable. |
| <ul style="list-style-type: none"> Additional footpaths and cycle ways will offer a variety of routes for walkers and cyclists. | <ul style="list-style-type: none"> The new residents using the paths will not be familiar with the way that local residents look after their valued paths and this could result in bad feeling against them. There may also be more dogs off leads which could cause problems. |

Specifically in relation to the Pigeon scheme, the Neighbourhood Plans team raise the following points:

- The site is separate from the settlement boundary.
- The site encroaches into the countryside.
- It lies on prime agricultural land.
- Concerns about road safety as the site is close to the Community College.
- Road safety concerns at Pokeriage Corner and accessing the A14.
- No safe crossing points for pedestrians to access the village.
- Impact of the development from two access points from Norton Road.
- The development is inappropriate to the abutting surrounding countryside.
- Impact on health and education in the village.
- The types and densities of the dwellings proposed do not match the local needs for smaller properties and bungalows.
- The affordable homes will be too expensive for local residents as they do not cater for the need for 1 and 2 bedrooms.
- Proximity and impact on the grade II* listed Manor Farm House.

- Size of school being proposed – 2 forms of entry possible rising to 3.

Thurston Parish Council has raised the following additional comments not previously referred to above in relation to this scheme:

- 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. The proposal is contrary to policy GP1, H13 and H16 of the local plan, policies FC1.1 and FC2 of the Core Strategy Focused Review and policy CS5 of the Core Strategy.
- 200 new dwellings would intrude into the currently open countryside and harm its setting and not reflect the local character of Thurston.
- The proposal is contrary to paragraph 58 of the NPPF as permanent pasture land would be lost and the proposal would fail to protect wildlife habitats in the area.
- The scheme does not consider the historic architectural and visual landscape connections between Manor Farm and Nether Hall and as such fails to protect a Grade II* Listed Building and is contrary to policy HB1 of the local plan.
- The density, tenure and mix of properties do not reflect that currently in Thurston.
- The Parish Council considers that the development fails to demonstrate that it has considered safe and suitable access points for all people and as such is contrary to paragraph 32 of the NPPF. As the development fails to give priority to pedestrian and cycle movements and given the location of the site, it would not support the transition to a low carbon future and is therefore 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 is concerned at the impact that will be had by the location of a site for 200 houses and a 420+ pupil primary school with 2 entrances near the Victoria Public House Car Park. The increased traffic that this development will produce will have a detrimental impact on Norton Road and it is felt that insufficient detail has been given to ensure that, with reference to NPPF paragraph 32 'safe and suitable access can be achieved for all people.' It is also acknowledged that Suffolk County Council in its response to Planning Application 2797/16 recommended refusal as the proposal 'could not be considered to be safe for all'. The Parish Council feels that that assessment holds true for this application and would ask that Highways be asked to comment on the suitability of two site entrances situated close to one another. The Parish Council is concerned that very little assessment has been carried out on the impact of vehicular movements on the two entrances and that consideration should be given to the dangers associated with vehicular and pedestrian movements at the single entrance to the proposed primary school.
- The Parish Council is also concerned 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).

The Parish Council has been consulted on the applicant's amended layout plan and they comment that whilst they appreciate the alterations that the applicant has made to the scheme, they still strongly object to it. They raise the following comments:

- Regardless of the changes, the site is still in the countryside and outside of the settlement boundary for Thurston and would still result in a development that would be visually, physically and functionally isolated from the facilities and services offered

by Thurston as a Key Service Centre.

- Whilst it is noted that the school site has been reconfigured, the parish still has concerns over pedestrian safety with regards to crossing points. It is noted that the proposed footpath does not link up to the existing footpaths in the area.
- The application still fails to take into account the current road infrastructure and the lack of pedestrian route-ways and cycle ways to connect to the to the secondary school and village facilities. This will still have a negative impact on traffic generation in the area which will affect the living conditions of local residents who live in the locality.
- Appreciates that the applicant has altered the two access points onto Norton Road to try and resolve highway safety concerns. However the Parish still question if the arrangement is safe.
- Whilst the applicant has potentially appeased the concerns of the residents of Meadow Lane by deleting the access points for the proposed dwellings on that part of the site and using the access points on Norton Road for the whole of the scheme, this arrangement will potentially put more pressure on Norton Road which the Parish is concerned about.
- The Parish Council acknowledges that the applicant has increased the percentage of bungalows (including affordable bungalows) on site as well as increasing the number of 1 and 2 bedroom properties on site whilst also doubling the market housing mix. However, the Parish is still concerned that the density of the scheme is still inappropriate for a rural setting on the edge of a village and that little or no account has been made of the increased pressure the smaller units will place on the parking provision within the site.

MSDC - Environmental Health – Public Protection – Does not object to the scheme as there is very little risk from the historical use of the site. The only onsite concern is from the infilled pond in the woodland area which is to be retained, but this risk from this is small. Advises that the impact of the scheme can be controlled by conditions

MSDC Heritage Officer – The site is in close proximity to the Grade II listed Church of St Peter and also to Manor Farm which is Grade 2* listed and also the barn to the north of it which is Grade II listed in its own right. The Historic Buildings Officer advises that the significance of Manor Farm is that it was designed by Philip Webb who was an influential architect and designer. He was also responsible for contemporary alterations at Nether Hall. The spacious rural setting of Manor Farm and its former farm buildings makes a positive contribution to their significance. However, Manor Farmhouse does not seem to succeed an earlier building, but is associated historically with Nether Hall to the north. As a later building, its agricultural surroundings make a less important contribution to its significance than would be the case for a traditional farmhouse. Since conversion of the barn complex, the introduction of residential development and activity in the curtilage of the barn dwellings has eroded the agricultural character of the land between them and the application site. Similarly development associated with the keeping of horses has changed the character of land belonging to Manor Farm.

The change from farmland to residential and school use would represent a degree of harm in the spacious rural setting of the listed buildings, but because of the factors referred to above the level of harm resulting to the significance of the listed buildings is considered to be low.

He advises in accordance with NPPF paragraphs 129, 132 and 134 that the Council in determining this proposal needs to consider whether this harm can be avoided or minimised, and whether it is justified in terms of public benefits.

The Historic Offer also asks whether the layout of the site can be altered to allow for a strong green buffer along the eastern boundary of the site which would serve to sustain a more rural character in the setting of the listed building.

As there are now 5 separate housing proposals in Thurston which together total 872 houses, with the potential for the cumulative impact of two or more of the schemes to have an impact on the heritage assets listed above, the Council's Heritage Officer has been asked for his comments. He considers that in terms of the assets listed above, only the Hopkins site (2797/16 & 5010/16) and this proposal will have a cumulative impact. He has assessed when considered together that 375 houses (up to 175 on the Hopkins site and up to 200 on this site) on a cumulative basis would cause harm to the grade II* Listed farm house of no greater than medium. He has assessed that even adding the harm to the significance of the nearby church; the resulting cumulative level of harm to the affected heritage assets would be greater than low but not greater than medium.

MSDC – Infrastructure Team – Confirms that the scheme as submitted will be subject to the Council's CIL payments.

MSDC - Strategic Housing (Summary) – Advises that no objections are raised to the scheme either in its original form or in the amended plans as 35% affordable housing is proposed in line with the Council's requirements. The strategic Housing Officer advises that the affordable housing provision should be provided on site as follows:

Affordable Rent Tenancy = 52 units as follows:

12 x 1b 2p flats @ 50sqm
2 x 1b 2p bungalows @ 50sqm
4 x 2b 4p bungalows @ 70sqm
22 x 2b 4p houses @ 79sqm
11 x 3b 6p houses @ 102sqm
1 x 4b x 7p house @ 115sqm

Shared Ownership = 18 units as follows:

12 x 2bed 4p houses @ 79sqm
6 x 3bed 6p person houses @ 102sqm

SCC Archaeology – Does not raise any objections to this scheme subject to the imposition of conditions.

SCC Flood and water management – They initially objected to the scheme, but following the submission of additional information from the applicant, they no longer object to the application subject to the imposition of conditions dealing with flood risk matters.

The SCC Flood Management Team has been asked to comment on the cumulative impact of 827 houses being proposed in Thurston and they have commented that they would expect all of the developers to design suitable sustainable drainage systems (which they all have). All of the 5 sites are in a flood zone 1 so they comply with national policy requirements. However, surface water drainage has historically been an issue in Thurston with soil conditions not being viable for water to drain away easily. Most of the surface water from the village is drained into the foul sewer system with the east part of the village having a surface water drainage system. It is understood that Anglian Water are considering options to improve capacity in the locality to help to prevent the flood events that have happened in the centre of the village in recent years.

SCC Highways – The Local Highway Authority has provided two responses on this proposal. One deals with the cumulative impact of this scheme and the four others that have all been submitted in Thurston on the local highway infrastructure. The second response deals with the highway issues that are specific to this proposal.

Cumulative impact - The Transport Assessments provided for the individual proposed developments show varying degrees of impact on the highway infrastructure. To date none have shown the cumulative impact of all five developments but at some locations SCC considers this may be severe, particularly where the network is already close to or exceeding capacity. Paragraph 21 of the National Planning Policy Framework (NPPF) states that planning policies should recognise and seek to address potential barriers to investment, including any lack of infrastructure and identify priority areas for infrastructure provision. Both SCC and MSDC are aware that paragraph 32 of the NPPF states that development should only be prevented on transport grounds where residual impacts of development are severe. The same statement allows decisions to be made taking account of whether improvements can be undertaken within the transport network that cost effectively limits the significant impacts of development.

On this occasion, we consider that by taking a co-operative approach for all five developments there is an opportunity that the planning process can provide improvements to both mitigate against any severe impacts and any lack of transport infrastructure.

Highway Infrastructure (Congestion)

The initial data and modelling provided in Transport Assessments indicates that the road network will experience additional traffic through growth and development and at some locations this will exceed the theoretical junction capacity. Those junctions that are or may exceed capacity are discussed below.

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

Modelling shows that this junction is already close to theoretical capacity in the AM peak with northbound traffic waiting to turn onto the A143 queueing on Barton Road and at capacity in the PM peak with Thurston bound traffic waiting right from the A143 into Barton Road. The additional traffic from the proposed developments in Thurston will exacerbate these problems; in particular, modelling shows the queueing traffic on Barton Road will exceed capacity in the AM peak.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

Modelling indicates that the southbound approach to the junction is currently close to capacity in the morning peak and that its capacity will be exceeded before all five developments could be delivered. However, in the PM peak the junction has the capacity for the predicted traffic for all developments.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The modelling of this junction shows some inconsistencies with one study indicating it will be close to capacity southbound on Thedwastre Road in the AM peak due to traffic from one specific development but other modelling showing it would have capacity for the traffic generated by the developments.

Highway Infrastructure (Road Safety)

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

There have been three recorded crashes resulting in slight injuries and one involving serious injury at this junction in the last 5 years for which data is available (2012-2016).

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

There have been two crashes resulting in slight injuries at this junction in the past 5 years.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

At this junction there have been 9 crashes resulting in slight injuries and one resulting in a serious injury in the past 5 years.

The frequency of injury related crashes at the C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner) junction would, in the opinion of SCC, necessitates some work to improve road safety. Although the frequency of crashes at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road does not justify significant road safety improvements it is a factor that should be considered in any future mitigation measures.

Suggested Mitigation Measures

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

An assumption has been made that the junction can be signalised and that this will reduce congestion and improve road safety. Although there is a generous width of highway verge in the vicinity of the junction the geography of the site may place constraints on the design and further work is required to confirm that a solution is possible or beneficial. The proposed junction improvements would be delivered through a jointly funded S106 contribution.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

The issue of congestion on the southbound approach is difficult to mitigate as there is insufficient land within the highway boundary to provide a meaningful solution. It is noted that the road network around Thurston is relatively permeable and an option exists for traffic to avoid this by diverting onto Beyton Road and then turning right to approach this junction from the east.

Several minor traffic management features such as improved signing, marker posts and high friction surfacing have been used at this junction in the past as crash reduction measures. Despite this, crashes causing injury continue to occur. To reduce the severity of these crashes it is proposed to restrict the road to 40mph and undertake local safety improvements such as enhanced road signs and markings. This would be delivered through a jointly funded S106 contribution.

A longer term solution would be to remodel the junction or drastically remodel the road network. It is recommended these matters should be addressed in any future revisions to the Local Plan.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The highway boundary constrains any improvements in this location and thus there does not appear to be any viable mitigation to increase capacity on the southbound Thedwastre Road approach. The relatively low number of crashes suggests that the issue of road safety is not as important as it is for the other two junctions and mitigation measures would only comprise low cost work, such as road signs and markings.

Speed Limits

It is noted that a number of proposed access roads are located close to or beyond the existing 30mph speed limit in Thurston. In some cases, assumptions have been made when determining visibility for these junctions that the 85%ile speed limits are or will be close to 30mph. Developers are advised that the visibility requirements shall be designed for the measured 85%ile speed adjacent to the junction and not the posted or proposed future speed limit. A legal process must be followed to change or extend a speed limit and during

this process objections can be made which can delay or stop creation of the necessary legal order. For this reason, Suffolk County Council cannot accept visibility splays based on changes to speed limits unless there is confidence that no significant objections to the traffic regulation order are likely.

Based on the available details of the five proposed developments the following changes to speed limits are suggested;

- Extend the 30mph speed limit north on Ixworth Road to Thurston Rugby Club
- Extend the 30mph speed limit on Norton Road towards and beyond Church Road
- Extend of 30mph speed limit on Barton Road west of Mill Lane
- Create a new 40mph speed limit between and including the C693 Thurston Road / C692 Thurston Road / C693 New Road and the C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road for road safety reasons.

The necessary Traffic Regulation Orders (TRO) could be raised individually or preferably as a single order. The latter is preferred as it reduces cost and administration. This can be delivered through site specific or joint S106 contributions. As stated above implementation of an order cannot be guaranteed and if a TRO is required to justify reduced visibility splay lengths then the order would need to be substantially complete before such a reduction would be accepted. If a process can be agreed between the parties' initial consultation can be undertaken in advance of determination of the planning applications.

Pedestrian and Cycling Infrastructure

The benefit of considering all five applications together is that a coherent system of footways and pedestrian crossings can be delivered in Thurston. The proposed footways are intended to provide good, direct pedestrian access both to the main village and schools. The proposed improvements, most of which have already been proposed by individual applications, are listed below:

- An uncontrolled pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road.
- A footway on west side of Ixworth Road between Norton Road and the entrance to Persimmon's site
- A footway link on Ixworth Road between the entrance to the Persimmon development and the entrance to the Thurston Rugby Club.
- A controlled pedestrian crossing facility (e.g. a raised table junction with zebra crossing) if practicable at or adjacent to the Norton Road / Station Hill / Ixworth Road junction. Pooled contributions from all 5 developments are required for the County Council to deliver this.
- A footway on the north side of Norton Road from Meadow Lane east towards Church Lane as far as the site boundary allows. This could be within the development and or on the highway verge.
- An uncontrolled pedestrian crossing on Norton Road crossing linking the Hopkins Homes and Pigeon sites
- Meadow Lane resurfaced to improve cycle / pedestrian facilities (and maintain access to properties)
- Provide a metalled footway on Church Road between Footpath 006 and the footpath link to School Lane. This will include provision of street lighting along this short section of footpath.
- Provide two uncontrolled pedestrian crossings on Sandpit Lane to link the Hopkins Homes development to the main village

With the exception of the pedestrian crossing facility at the junction of Ixworth Road, Station Hill and Norton Road, the above are expected to be secured by conditions or S106 obligations as appropriate and delivered by the relevant development with S278 (improvements to existing highway) or S38 agreements (if adoption as highway maintainable at public expense is desired) as appropriate. All the footways are expected to be metalled and where verge space allows provision for cyclists should also be considered.

Public Rights of Way (PRoW)

It is proposed that a small number of PRoW are improved to provide alternative pedestrian links between the proposed developments and current and future school sites. These are improvements to:

- Thurston Footpath 001 between Ixworth Road and Meadow Lane. It is proposed that this is to an all-weather standard, preferably a bituminous surface.
- Thurston Footpath 018 between Ixworth Road and Mill Lane. This lies within the development site and the works can be secured by condition.
- Thurston Footpath 006 between Norton Road and Church Road. This lies within the development site and the works can be secured by condition. It is proposed that this is to an all-weather standard; preferably a bituminous surface as far as it is a safe pedestrian route to the site north of Norton Road
- New PROW link along southern boundary of the Bovis Homes site to join Barton Road
- New PROW link from the site west of Barton Road to Heath Road, linking with Cycle Route 51.
- Improve PROW 007 North of Meadow Lane (un-metalled).

If diversion of a PRoW is likely it is recommended that discussions are held with the relevant SCC officer at an early state.

Public Transport

Improvements to public transport infrastructure will be limited to any site-specific works necessary as a result of each development through S106. All other public transport improvements are included in the CIL.

The specific highway comments relating to this scheme only are as follows:

Site Access from the public highway – These are the subject of the last lot of amended plans and no objections are raised to them.

Internal Highway layout – The layout of the internal site is indicative only and this is to be agreed at Reserved Matters stage.

Car parking - To be agreed at Reserved Matters stage having regards to the Council's standards.

Footway and cycle connectivity - These are the subject of the last lot of amended plans and no objections are raised to them.

Public Rights of Way (PRoW) – Acknowledges that no paths go through the site, but Thurston Footpath 001 forms a significant link between the site and Ixworth Road, the Thurston Community College and probable future developments along Ixworth Road, therefore S106 funding for improvements to this path is requested.

Landscaping – This is the subject of the last lot of amended plans and no objections are raised to them.

Road Safety - The data available indicates that the single significant location with a high frequency of crashes is at the junction of C693 Thurston Road / C692 Thurston Road / C693 New Road and not Thredwastre Road / New Road as stated. It is proposed that mitigation measures are undertaken at the Thurston Road / New Road junction.

Public Transport - The nearest bus stop is approximately 500m from the site. If practical it is proposed that additional bus stops and shelters are placed either side of Norton Road to the east of Rylands Close.

Trip Generation - The Trip rates and modal splits are considered acceptable.

Junction Assessment - It is noted that four junctions were modelled:

- Junction 1: Norton Road / Church Hill / Pakenham Road
- Junction 2: Norton Road / meadow Lane / Sandpit Lane
- Junction 3: Station Hill / Barton Road
- Junction 4: Beyton Road / Thurston Road / Thedwastre Road

The A143 / Barton Road was not included, although 15% of the vehicles are expected to use this route. Modelling from other developments indicates that this junction is operating at or close to capacity in the peak periods and any additional traffic may have a severe impact. This matter is addressed in the letter regarding the cumulative impact of the five developments.

The flow diagrams used for modelling of the AM peak the Norton Road East approach to the Pakenham Road junction seems to not agree with the traffic survey. It is also thought that there may be some confusion over the approaches to the Thurston Road/Thedwastre Road crossroads, when compared to the survey. These should be reviewed. The applicant has provided additional information to the Local Highway Authority and this matter has now been successfully resolved.

The Local Highways Authority advises that the remainder of the issues that are relevant to this proposal can be covered by planning conditions and within the S106 agreement for the scheme. The S106 heads of terms will cover the following issues:

- Improvements to PRoW Thurston 001 between Meadow Lane and Ixworth Road. A contribution of £7111 on commencement of the 100th dwelling.
- Improve PROW 007 (un metalled) north of Meadow Lane. A contribution of £16500 on commencement of the 100th dwelling.
- Contribution towards extension of speed limit on Norton Road. A contribution of £4267 on commencement of any construction work on site.
- Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction. A contribution of £21838 on occupation of the first dwelling.
- Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £69,528 on commencement of any construction works on site.
- Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road. A contribution of £12624 on commencement of the first dwelling.

- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum 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
- Travel Plan Implementation Bond – To be confirmed when a detailed application/Travel Plan is submitted. This will be used to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves
- Full Implementation of the Travel Plan and its monitoring
- Provision of an approved welcome pack to each dwelling after first occupation
- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

Except for the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton the reasons for requesting these contributions are described above. The A143 improvements are mitigation to improve capacity at this junction reflecting the small individual but, in terms of cumulative impact, significant effect that the five developments will have at this junction. The Local Highways Authority has indicated that the cost of this will be £131,868 for the works required under S106 of the act and £69,788 for works under section 278 of the Highways Act.

SCC - Obligations Manager: Comments that 200 new houses proposed in the scheme will have an impact on local infrastructure particularly in terms of education.

Primary Provision

The residents of the scheme will generate the need for 43 new primary school places and it has been advised that there is no capacity in the local Primary School which is the Thurston Church of England Primary Academy to accommodate this development and as such a contribution is requested towards a new primary school. As new schools cannot be provided through the Council’s CIL scheme (the 123 list only allows for extensions to schools and not new schools) a request is made for a contribution towards a new school under S106 of the planning act.

A contribution for £821,450 as broken down below is require to meet education needs which will arise from this development:

| School level | Minimum pupil yield: | Required: | Cost per place £ (2016/17): |
|----------------------------------|----------------------|-----------|-----------------------------|
| Primary school age range, 5-11*: | 50 | 50 | 16,429 |

Land for new school

A contribution for a further £64,700 is also requested to contribute towards the cost of the land to provide the school. This is worked out on a maximum cost of £100,000 per acre (£247,100 per hectare, which will be £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 50 places x £1,294 per place = **£64,700**

Temporary classroom

The Obligations Manager has also advised that there will be a need for temporary classroom arrangements to accommodate the needs of the children that arise from this development. The existing primary school is on a very constrained site and an extension to the facility is not possible under Department for Education guidelines. However, it is advised that where extra pupils either through a spike in local population or from housing development cause a 'bulge' in the admission numbers, this can be accommodated by providing temporary classrooms.

A double temporary mobile classroom providing 60 places could be located within the hard surfaced play and car park areas within the school for a period of no longer than 3 years to meet the admissions 'bulge' which would be caused by this and other large housing developments in Thurston. As the primary school is an academy whereby the County Council has limited control over its operation, agreement to the provision of the temporary building has had to be sought from the Academy board that runs the school and it is understood from the Obligations Manager, that agreement has now been given by them for this to go ahead.

The temporary classroom will be facilitated via a CIL bid as it is classified as being an extension to an existing school in the Council's 123 list.

Secondary School and 6th form provision

The Obligations Manager has commented that secondary and 6th form provision in the area is currently sufficient to accommodate the additional pupils which will be generated from this proposal as shown in the table below.

Total primary education contributions: £886, 150

Restriction on occupation

The Obligations Manager has also commented that as there is another application in Thurston that is proposing a primary school site (application 4963/16 – Land West of Ixworth Road for Persimmon Homes) but neither this or that application is approved yet, that the district council should consider imposing a planning condition restricting occupation of any dwellings once the capacity of the existing primary school with additional temporary classroom are full. This condition could then be discharged once the construction of the new primary school on whichever site has been chosen has commenced.

Pre-school

The Obligations Manager has also noted that there are currently 4 pre-school establishments in the locality (2 childminders, Thurston pre-school and Tinkerbells Day Nursery) and that spare capacity between them is only 10 spaces. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution for this scheme would be based on 8 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 175 dwellings there is the need for 8 additional places

Therefore 20 pupils x £8,333 per place = **£166,660 (2016/17 costs)**

Total contribution for all education provision - £1 052, 810

Other infrastructure contributions

Requests a contribution of £43,200 towards library provision. This is requested under the Council's CIL 123 list.

SCC Public Rights of Way – Notes that public footpath number 7 runs through the site, but does not raise any objections to the scheme.

Anglian Water – They do not object to this proposal as it does not interfere with any of their assets. They confirm that foul drainage capacity is available at the Thurston Water Recycling Centre and there is capacity in the sewerage system to carry the sewage from the proposed dwellings.

Ecology Officer, Essex Place Services – Has not raised any objections to the scheme in terms of loss of hedgerows or impact on any protected species. The officer has advised that the applicant needs to mitigate against the loss of Skylark habitats as they are a UK and Suffolk Priority Species. The applicant has agreed to provide two Skylark plots at an offsite location away in the Thurston area and this can be secured via a S106 agreement.

Environment Agency – Does not object to this scheme on flood risk or on foul water grounds. They advise that the site is subject of a historic waste landfill and that the Council's Contaminated Land Officer needs to assess and make comments on the applicant's submission (see elsewhere in this report for this).

They have also considered the cumulative impact of all 5 schemes together and they advise that none of the sites are in an area at risk of fluvial flooding. They also confirm that from their records there will be sufficient capacity in the Thurston Water Recycling Centre to accommodate all 827 dwellings. They have advised that Thurston lies in an area of 'water supply stress' by Anglian Water which has a duty under their own legislation to provide a water supply to new houses when they are built.

Fire Service - County Fire Officer – Does not object to the proposal, but advises that details of the location of sufficient fire hydrants to make the development safe must be submitted. This can be covered by a planning condition.

Historic England – They do not object to the scheme but raise the following comments: Historic England considers that the application is on a large parcel of land adjacent to the Grade II* Listed Manor Farm House complex and could affect its setting. Thurston as a village has over the years grown out towards the Manor Farm complex and eroded its agricultural landscape. Whilst they note that there will be a buffer zone of landscaping and open space separating the new houses and the grade II* listed building they are still concerned that the housing could erode the rural character of its surroundings and harm its historic significance. As a consequence of the above it is the role of the Council to assess the impact and weigh it against the public benefit that the scheme will bring in line with the requirements of paragraph 132 of the NPPF in making a decision on this proposal.

Landscape Officer – Essex Place Services: Comments that the proposal will significantly change the visual character of the site which will change from agriculture to residential.

He advises that the Landscape Statement provides a clear methodology for the landscape strategy which includes plant species, landscape character, public open space provision and public realm, surface materials. The Landscape Statement proposes a clearly considered green infrastructure which adequately mitigates the impact of the development. The indicative layout includes a good range of public realm and public open spaces with high amenity value.

Views to the development identified on the LVIA have been adequately mitigated through planting along edge boundaries and within the residential development helping to screen and filter those critical views.

Having regards to the above, he does not object to this proposal.

Network Rail – They have been consulted on the cumulative impact of building 827 new dwellings in Thurston on the railway station and the local railway network as requested by the local community. They state that the main issue is the Barrow Level Crossing at Thurston station which has historically seen a number of safety issues associated with it and the level of usage which would arise from the erection of the number of dwellings proposed would have a severe impact on safety unless mitigation measures are introduced. They indicate that their preferred option is to close the level crossing and replace it with a new pedestrian ramp from platform 1 (upside) down the embankment leading onto Beyton Road. This design will also need to include a drop off point/layby for vehicles along Beyton Road. They have advised that the cost of the works amount to £1million and should be shared proportionally amongst the developers. They are seeking this through a S106 agreement.

When questioned, Network Rail has made it clear that the works that they propose to the crossing point at Thurston Station are directly related to the impact of the 5 planning applications and the 827 houses that would be built. They have advised that the other works that they propose to close crossing points elsewhere on the same line are minor in nature and cannot be compared to this site as the other crossing points are not facing unprecedented levels of pedestrian use which would be generated from the proposed housing in Thurston.

NHS/Primary Care Trust – The proposal will have an impact on the Mount Farm Doctors Surgery which is based in Moreton Hall, Bury St Edmunds and there will be a need to either extend or reconfigure the building to meet the additional capacity requirements that will be generated if this proposal is approved. The PCT have not specified an amount that they require, but they have confirmed that they will be making a bid under the Council's CIL scheme for the funding that they require to carry out the works they deem necessary to ensure that the facilities can meet the need that arises from this development.

Ramblers Association – Have concerns that this proposal will swamp footpath 7 so it will no longer be the pleasant walk that it is now.

Suffolk Preservation Society: Object to this scheme on the following grounds:

- It is a Greenfield site and is poorly related to the village.
- It is harmful to the setting of Manor Farm which is a Grade II* Listed Building and a group of barns that adjoin it which are Grade II Listed in their own right due to the loss of their associated agricultural land and subsequent development with housing.
- It is acknowledged that the harm generated will be less than substantial and the society urges the Council to consider the impact significant when balancing the harm to the listed building with the benefits that the scheme brings.

Suffolk Wildlife Trust – Comment that they are unclear as to how many of the hedgerows within the site are to be removed as these offer habitat for birds and foraging grounds for bats. Consent should not be supported for schemes that would result in the loss of hedgerows which are a UK and Suffolk Priority Habitat. The application site is likely to provide suitable nesting habitat for Skylarks which are also UK and Suffolk Priority Habitat and as such suitable compensation for this loss would need to be provided with this application to make it acceptable. There were no badgers on site when the Trust visited, but badgers can colonise sites quickly and a walkover survey is suggested before any works are carried out on site if planning permission is granted for this scheme. Query how the greenspace and drainage areas within the site will be managed in the future to maximise its benefits for biodiversity enhancement. Advise that if this proposal is supported that the development should be carried out in accordance with the recommendations of the ecology report.

Representations

9. 34 letters in total have been received objecting to this proposal on the following grounds:

Highway safety

- The local roads are inadequate and dangerous to cope with so many new dwellings and they are always in a poor state of repair which will be made worse by this proposal.
- There are a number of dangerous junctions and pinch points in the area which will become more dangerous with the number of vehicles which will be generated by this development.
- Additional vehicles on the road network will cause congestion and chaos at peak times.
- The railway station has poor parking. Additional residents from this site using the railway station to access places such as Bury St Edmunds will increase the parking issues experienced.
- The 9 self-build plots are accessed from Meadow Lane which is a single track road with a dead end and no turning area. To use this road would be unacceptable and unsafe on highway safety grounds.
- Saw a traffic survey being carried out earlier this year in Thurston. This proposal must be considered having regards to its findings. Any future traffic surveys should be done at peak times during the day to be accurate.
- The new school will generate unacceptable traffic on Meadow Lane which is unacceptable.
- This scheme proposes to change the speed limit of the road to 30mph. This might not be possible as that is a different legal process to this planning application.

Infrastructure

- This development will create excessive pressure on the local GP surgery as well as other NHS infrastructure in this part of Suffolk.
- The PCT is asking for contributions towards improvements at the Park Farm Surgery and at the one at Woolpit, but this ignores the fact that most of the residents use the one at Ixworth. This proposal will therefore put more pressure on the Ixworth Surgery.
- It will also put additional pressure on all of the emergency services in the area.
- This development will place an excessive demand on the infrastructure of the area which will need to be resolved before any of the houses could be built.

- The local primary school cannot accommodate the children from this development.
- The scheme does not mention its impact on the secondary provision in the locality either.
- The local railway network will also not cope with the usage needs from the new residents of this proposal.
- Who will maintain the drainage system for the site and the open space areas? This raises concerns as there have been surface water floods in the surrounding area in the past.
- The local bus service is poor and inadequate to cope with the needs of the new residents of this site.
- We can see the need for a new primary school, but this site is unsuitable as it is on the edge of the village and not very accessible.
- There is no mention of employment opportunities in the application.

Impact on the character and amenity of the area

- Too many houses are proposed in this proposal.
- People use this amenity to walk with their families. This will be lost to future generations.
- The erection of 2.5 to 3 storey houses will be out of keeping with the local environment as there are none in the locality. There needs to be a height limit imposed on the dwellings if this scheme is approved to ensure that they are no higher than the existing surrounding properties
- The self-build houses will be out of keeping with the simple ones already on Meadow Lane.
- The additional dwellings and their infrastructure will cause increased light pollution in the locality and affect the open countryside.
- The erection of additional dwellings will generate more noise than the existing tranquil environment of the site and its surroundings.

Impact on residential amenity

- The proposal will cause light pollution into existing properties.
- The erection of new houses in close proximity to existing properties will cause noise pollution which will impact on the living conditions of the occupiers.

Impact on designated heritage assets

- The proposal will have a negative impact on the setting of the grade II* Listed Manor Farm House.

Impact on wildlife in the locality

- The scheme will result in the loss of trees and hedging which will have a negative impact on wildlife in the locality, particularly birds.

Other issues

- This proposal is not sustainable.
- This proposal should not go ahead until the Council works collaboratively with the local community and prepares its new local plan for the district and the new Neighbourhood plan is issued.
- When will Mid Suffolk tell us the maximum number of new houses Thurston should take in the new Local Plan for the district?

- The developer has ignored the local need for more bungalows in his proposal.
- The field which is the subject of this proposal has been used to grow crops over the years. Once developed on, this ability will be lost forever.
- Development should be on Brownfield land and not on Greenfield land.
- This site is on the edge of the village and result in the loss of valuable open countryside.
- Wi-Fi and broadband connections are poor in the village and this scheme will make matters worse.
- Why has Lady Greene's plantation been included as part of this proposal and who is going to maintain it?
- This plot is too big and on the wrong side of the village.
- We are a village and not a town!
- Why has the Council allowed the developer to submit this application?
- No consideration has been given to the needs of the elderly in the village. No sheltered accommodation or care home has been suggested in any of these schemes.

Non material planning comments

- We will lose our view over the beautiful surrounding open countryside.
- This proposal will affect the value of our property.

Cumulative Impacts

- The 5 sites in Thurston should be considered cumulatively and not singularly due to their linked impacts and they should also be considered having regards to the Granary site which already has permission.
- 827 houses are proposed and have concerns that there will be insufficient water supply and sewage capacity in the system to cope with them all
- There are too many houses proposed particularly when you take into account all of those in Bury St Edmunds which is only a short distance away from Thurston

Amended plans

- A further letter has been received in relation to the applicant's amended plans stating that the Pigeon development seems to have now addressed a number of the concerns that the village had with the scheme. The following additional comments are also made:
- The suggested new layout of the bungalows along Meadow Lane has reduced the density in that position.
- There is also an increase of bungalows to 26% and they have also increased the number of 1 & 2 bedroom properties.
- They have also put a landscaped buffer along the length of the eastern boundary.

The Site and Surroundings

10. The application site lies in the village of Thurston which has a population of approximately 3200 people (2011 census) with the site extending to an area of 18.1 hectares of grade 3b agricultural land. The land is generally flat but falls away gently towards its most northern point. To the west of the site is Meadow Lane which is a single car width dead end road which leads down to a row of cottages. To the south of the site lies Norton Road. In the north eastern corner of the site lies the Lady Green's Plantation wooded area. Other than the wooded area, the whole field is in

use for agricultural purposes.

11. The site abuts the settlement boundary for Thurston and remains as countryside for planning purposes.

The Proposal

12. Please note details of the proposed development including plans and application documents can be found online.
13. Proposed is an outline planning application for the erection of up to 200 dwellings, including 9 self-build plots, the provision of 3ha of land for a new primary school together with landscaping and infrastructure. All matters are reserved except for access which is to be considered as part of this application.
14. The applicant has submitted plans showing a suggested layout utilising a single spine road through the site with various secondary streets leading through to the dwellings. The dwellings are shown on the western part of the site running south to north with the school and the landscaping belt running south to north on the eastern part of the site. The layout shows that the new access road will loop through the site and two access points will be provided from Norton Road. This is to ensure that conflict between the residents of the site and school users is minimised at peak times.
15. The layout shows the Lady Greene Plantation being incorporated into the scheme and strengthened at its northern point to ensure that the urban edge of the scheme is softened where it meets the open countryside. The combined woodland area (existing and proposed) is approximately 3.1 Ha. The applicant has also in his recent amended plan strengthened the boundary treatment along the eastern part of the site in line with the comments made by Historic England and by the Council's Heritage Officer (this will be discussed in greater detail later on in this report). The amended illustrative masterplan also repositioned the location of the 9 self-build plots which are now shown as being accessed from within the site rather than from Meadow Lane. The parameters plan shows the self-build plots located to the north of the site adjacent to a 1.9 Ha parcel of public open space. The amended illustrative masterplan has also increased the ratio of bungalows and smaller 1 and 2 bedroom properties. The illustrative masterplan and bungalows plan show 51 bungalows (26%) and 95 (48%) 1 and 2 bedroom properties. This plan gives the scheme an approximate density of 20 dwellings per hectare.
16. However, it is important to note that the layout plans (be they the originally submitted ones or the amended ones) are indicative only and are not for consideration at this stage in the planning process, but have helpfully been included by the developer to show how the site could successfully be developed and to show the Council's consultees that the matters that they raise can be addressed should this scheme be approved and the detailed layout is submitted for consideration at a later date.

NATIONAL PLANNING POLICY FRAMEWORK

17. The National Planning Policy Framework (NPPF) contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.

18. The following parts of the NPPF are considered to be applicable to this scheme:

Para 6: Achieving sustainable development
Para 7: Three dimensions to sustainable development
Paras 11 – 15: The presumption in favour of sustainable development
Para 17: Core planning principles
Paras 32 and 34: Transport movements
Para 47: Delivering a wide choice of high quality homes (including the need to have a 5 year deliverable supply of housing)
Para 49: All housing proposals should be considered in the context of the presumption in favour of sustainable development.
Paragraph 55: To promote sustainable development in rural areas.
Paras 56 & 60: Requiring good design
Para 64: Development of poor design must not be supported.
Para 69: Promoting healthy communities
Para 70: Delivery of social, recreational and cultural facilities that the community needs.
Para 72: Provision of school places.
Para 73: Access to high quality open space.
Para 75: Protection and enhancement of public rights of way.
Para 100: Development and flood risk
Para 103: Development and increasing flood risk elsewhere
Para 109: Planning system should contribute to and enhance the natural and local environment.
Paras 112 & 117–119: Development affecting protected wildlife
Para 123: Planning and noise.
Para 125: Planning and darker skies.
Paras 128 & 129: Describing the significance of a designated heritage asset.
Para 131: Determining planning applications that affect heritage assets.
Para 132: Significance of heritage assets.
Para 134: Development and less than substantial harm
Para 186: Approaching decision taking in a positive way.
Para 187: Local Planning Authorities should find solutions rather than problems in decision taking.
Para 196: Plan led planning system.
Para 197: Assessing and determining application applying the presumption in favour of sustainable development.
Paras 203 -206 – Planning conditions and obligations.
Paras 211 - 212: Using development plans and the NPPF in decision making.
Paras 214 – 215: The weight attached to development plan policies having regards to their consistency with the NPPF.
Para 216 – Weight given to policies in emerging plans

CORE STRATEGY

19. Core Strategy Focused Review

FC1 – Presumption in favour of sustainable development.
FC1.1 – Mid Suffolk’s approach to delivering sustainable development
FC2 – Provision and distribution of housing.

20. Core Strategy

CS1 – Settlement hierarchy

- CS2 – Development in the countryside & countryside villages
- CS4 – Adapting to climate change.
- CS5 – Mid Suffolk's environment
- CS6 – Services and infrastructure
- CS9 – Density and mix

NEIGHBOURHOOD PLAN / SUPPLEMENTARY PLANNING DOCUMENTS /AREA ACTION PLAN

21. In 2013 Thurston received a neighbourhood plan designation and the settlement is currently working on its new neighbourhood plan. The plan is however at an early stage and as yet does not have any policies which could be used in the assessment and consideration of this proposal

SAVED POLICIES IN THE LOCAL PLAN

22. GP1 – Design and layout of new developments
 HB1 – Protection of historic buildings
 HB13 – Protecting ancient monuments
 HB14 – Ensuring that Archaeological remains are not destroyed
 H3 – Housing developments in villages
 H13 – Design and layout of development
 H15 – Development to reflect local characteristics.
 H16 – Protecting existing residential amenity
 H17 – Keeping new development away from pollution
 CL8 – Protecting wildlife
 CL11 – Retaining high quality agricultural land
 T9 – Parking standards
 T10 – Highway consideration in developments
 RT4 – Amenity open space and play areas within residential development
 RT12 – Footpaths and bridleways
 SB3 – Retaining visually important landscapes

Main Considerations

23. From an assessment of relevant planning policy and guidance, representations received, the planning designations and other material issues the main planning considerations considered relevant to this case are set out including the reason/s for the decision, any alternative options considered and rejected. Where a decision is taken under a specific express authorisation, the names of any Member of the Council or local government body who has declared a conflict of interest are recorded.
24. The following are identified as the main considerations in assessing this application:

The Principle Of Development

25. The National Planning Policy Framework (NPPF) requires Councils to identify and update, on an annual basis, a supply of specific deliverable sites sufficient to provide for five years' worth of housing provision against identified requirements (paragraph 47). For sites to be considered deliverable they have to be available, suitable, achievable and viable.
26. Relevant policies for the supply of housing should not be considered up-to-date if the

local planning authority cannot demonstrate a five year supply of deliverable housing sites (as stated in paragraph 49 of the NPPF). Where policies cannot be considered up-to-date, the NPPF (paragraph 14) cites the presumption in favour of sustainable development and states that planning permission should be granted unless i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or ii) specific policies in the NPPF indicate development should be restricted. The presumption in paragraph 14 also applies where a proposal is in accordance with the development plan, where it should be granted without delay (unless material considerations indicate otherwise).

27. The precise meaning of 'relevant policies for the supply of housing' has been the subject of much case law, with inconsistent results. However last month, the Supreme Court gave judgment in a case involving Suffolk Coastal District Council which has clarified the position. The Supreme Court overruled earlier decisions of the High Court and the Court of appeal in this and other cases, ruling that a "narrow" interpretation of this expression is correct; i.e. it means policies identifying the numbers and location of housing, rather than the "wider" definition which adds policies which have the indirect effect of inhibiting the supply of housing, for example, countryside protection policies. However, the Supreme Court made it clear that the argument over the meaning of this expression is not the real issue. The absence of a five year housing land supply triggers the application of paragraph 14 of the NPPF. In applying the 'tilted balance' required by this paragraph, the Council must decide what weight to attach to all of the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies.
28. In accordance with National Planning Policy Guidance paragraph 030 (Reference ID: 3-030-20140306) the starting point for calculating the 5 year land supply should be the housing requirement figures in up-to-date adopted Local Plans. It goes on to state that *'...considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light....Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints...'*
29. The Council published the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA) in May 2017 which is significant new evidence for the emerging Babergh and Mid Suffolk Joint Local Plan. Therefore, the 5 year land supply has been calculated for both the adopted Core Strategy based figures and the new SHMA based figures. For determining relevant planning applications, it will be for the decision taker to consider appropriate weight to be given to these assessments and the relevant policies of the development plan.
30. A summary of the MSDC 5 year land supply position is:
 - Core Strategy based supply for 2017 to 2022 = 3.9 years
 - SHMA based supply for 2017 to 2022 = 3.9 years
31. The NPPF requires that development be sustainable, and paragraph 6 of the NPPF sets out guidance on what this means in practice by drawing attention to all of the policies from paragraph 18 to 219 of the NPPF. In some circumstances there is also

a presumption in favour of sustainable development which is to be applied as set out in paragraph 14 of the NPPF. This has been discussed above.

32. Paragraph 7 of the NPPF sets out three dimensions for sustainable development, economic, social and environmental:

"an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure:

a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."

33. In light of all of the above, this report will consider the proposal against the policies of the development plan to determine if the development is in accordance with the development plan as a whole. If it is not, and there are policy conflicts, they will need to be weighed against other material considerations to see whether a decision which does not accord with the development plan is warranted, in the light of the presumption in favour of sustainable development, and in the context of the authority not being able to demonstrate a 5 year land supply.

Sustainability of the Proposal (including assessment against the development plan and the NPPF)

34. The NPPF also provides (para 187) that *"Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."*
35. The Parish Council and some of the objectors have commented that this scheme should be refused as it is outside the development limits for Thurston in line with the policies as contained in the adopted Core Strategy and Local Plan and that housing numbers should be limited in Thurston. However, it is clear on reviewing the guidance in the NPPF as outlined above that this cannot be done as housing delivery policies CS1 and CS2 of the core strategy should not be considered to be up-to-date along with policies such as H7 of the Local Plan as the Council does not have a 5 year supply of housing as required by the NPPF. Other comments have been received stating that the Council should not consider this application and the others in the Thurston area until the Council determine in a new style local plan and its stance on the location of new housing in the district. Comments have also been made that the Council should not determine this application until the Parish Council's Neighbourhood Plan has received its referendum vote. However, national policy as contained in the NPPF does not give the Council either of these options and requires all applications to be determined promptly. Furthermore, as the Council has a deficit of housing completions with the result that it is significantly short of reaching its 5

year supply target, a limit on new housing in any part of the district cannot be given until the deficit in completions is made up to the 5 year level.

36. The contents of paragraph 55 of the NPPF are also considered to be material in the making of a decision on this case. Objections have been received stating that this proposal should not be allowed as it is outside the settlement limit for Thurston and that the site should be considered as countryside. Paragraph 55 of the NPPF makes it clear that Councils can no longer consider sites that are adjacent or near to a settlement limit to be unacceptable simply because they are the wrong side of the line. It now makes it clear that 'new isolated homes in the countryside will not be supported and that Councils are encouraged to promote sustainable development in rural areas by considering housing development in locations where they could enhance or maintain the vitality of rural communities. It gives an example in paragraph 55 that new housing could provide increased facilities in one settlement which would be of benefit to it and the other surrounding settlements.
37. Having regards to the above, it is considered that the application site is not in an isolated location as it is adjacent to the built up part of the village, and the scheme will bring with it a new primary school, land to expand the secondary school as well as other contributions which will be of benefit to the residents of Thurston and the surrounding villages. Therefore, in terms of paragraph 55 of the NPPF, this proposal could be considered to promote sustainable development in a rural area. However, having regards to the fact that the Council does not have a 5 year supply of housing and has to balance the negatives of the scheme against the positives that it brings in line with the requirements of the NPPF, consideration of whether the scheme will be supported as sustainable development or not will be given in the conclusion to this report.
38. In reaching a decision, paragraph 47 of the NPPF is a material consideration and requires Local Planning Authorities to boost significantly the supply of housing, by identifying and updating annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. As stated above, the Council cannot demonstrate a 5 year supply of housing and as such paragraph 49 of the NPPF applies and states that in this situation, the relevant policies for the supply of housing in the Council's adopted plan should not be considered to be up to date and that the scheme remains to be considered under the requirements of paragraphs 7 and 14 of the NPPF which defines what sustainable development is and how decisions should be made.
39. Since the submission of this application, four other developers have also submitted application for residential development in Thurston. Bovis Homes have applied for 138 dwellings on land on the west side of Barton Road (4386/16); Persimmon have applied for 250 dwellings plus a new school on land west of Ixworth Road (4963/16); Laurence Homes have applied for 64 dwellings on land at Meadow Lane (4942/16) and Hopkins Homes have applied for 175 dwellings (2797/16 and an identical proposal under reference number 5010/16 which they have appealed for non-determination). Including this application, 827 new homes are currently proposed in Thurston. There are also a further 92 dwellings which have planning permission at the Granary where works are commencing on site at present.
40. Following receipt of these applications an approach of joint working to explore cumulative infrastructure issues has been agreed between the respective applicants and the District and County Council. This has enabled the constructive exploration of significant infrastructure issues on a collaborative but without prejudice basis to a

consensual timetable. Therefore, as there are unprecedented numbers of new dwellings proposed it is considered that all schemes must be considered both on their own merits and in combination with each other to assess if they meet the tests for sustainable development as outlined in the NPPF. The assessment of whether this proposal is considered to constitute sustainable development is given in the conclusion.

41. Policy FC1 of the Mid Suffolk District Core Strategy Focused Review states that it takes a positive approach to sustainable development and like in the NPPF, the Council will work proactively with developers to resolve issues that improve the economic, social and environmental conditions in the area. Related policy FC1.1 makes it clear that for development to be considered sustainable it must be demonstrated against the principles of sustainable development. The policy goes on to say that proposals for development must conserve and enhance the local character of the different parts of the district and how it addresses the key issues of the district.
42. The settlement of Thurston is one of the two largest villages in the district of Mid Suffolk (with the other being nearby Elmswell) where a wide range of local services and local infrastructure is provided. Thurston has both a primary and a secondary school, and a number of other local facilities which act as a service to the inhabitants of the village as well as providing employment opportunities. Whilst Thurston does not have a doctor's surgery, there is one in Woolpit and another in Moreton Hall which is a reasonably short journey away either by car or via public transport.
43. Thurston is also unusual in that it has a railway station which provides access for the residents to be able to commute to Ipswich, Bury St Edmunds and further afield without having to use their cars. Thurston is also on the Mendlesham to Bury St Edmunds bus route with a number of designated stops within the village.
44. In relation to paragraph 7 of the NPPF, the proposals would contribute to building a strong, responsive and competitive economy through the creation of construction and related jobs and the on-going contribution to the local economy from the creation of up to 200 additional households in the area. The proposals would also contribute towards providing the supply of housing required to meet the needs of present and future generations and by having the potential to create a high quality built environment, as well as contributions towards affordable housing, the highway network and other social infrastructure (public open space, education, health care) through a CIL contribution, or where appropriate, a section 106 agreement.
45. It must also be remembered that paragraph 49 of the NPPF makes it clear that housing applications should be considered in the context of sustainable development. The applicant is proposing up to 200 dwellings in this instance and they have confirmed that it is their intention if they get planning permission to commence with work on site as soon as possible following the granting of their reserved matters application. To speed this up, they have agreed to have a shorter period than is usual to submit their reserved matters application (2 rather than 3 years) which helps to justify that as a developer, they are serious about delivering the houses. They have also signed an agreement with Mid Suffolk and Suffolk County Council to work as a group with the other 4 other developers in Thurston to contribute to and work together to achieve the necessary infrastructure within the area to make this and the other 4 schemes sustainable.

46. Consideration of whether this proposal is considered to constitute sustainable development, having regard to the contents of policies FC1 and FC1.2 of the Adopted Core Strategy Focused Review and the contents of the NPPF will be reached in the conclusion to this report.

Site Access, Parking And Highway Safety Considerations

47. Policy T10 of the Mid Suffolk District Local Plan provides criteria on highway considerations when assessing planning applications. This policy requires access points into and out of the site to be safe and an assessment made as to whether the existing local roads can suitably accommodate the impact of the proposal, whether adequate parking and turning spaces exist within the site and that the needs of pedestrians and cyclists have been met. This policy is considered to carry significant weight in the determination of this application as it is in compliance with paragraph 32 of the NPPF which requires all schemes to provide safe access for all.
48. A number of objections have been received to the scheme on the grounds that the two access points into the site from Norton Road would be detrimental to highway safety and that the local road network is unsuitable and badly maintained for a development of a further 200 dwellings. Mention has specifically been made that some local junctions are unsafe at present (see Parish Council objection for details as well as the Local Highway Authority consultation response), particularly those adjacent to the railway bridge to the south of the village and that this scheme will exacerbate this problem as more vehicles will be using these junctions to access local roads, particularly the A14 to reach other destinations such as Bury St Edmunds and further afield. Comments have also been received that this scheme cumulatively with the other 4 schemes that have been submitted in Thurston for residential development will cause a significant and severe impact on the road network in the locality both in terms of congestion and safety.
49. The site is located to the north east of the village with Meadow Lane bordering the site to the west and Norton Road to the south. Proposed is two access points from the loop road within the site off Norton Road which would help to split traffic accessing the dwellings from traffic accessing the new school at peak times. The Local Highway Authority did not object to the access points as originally shown by the applicant or the newly amended layout which has resulted in the access point being moved to accommodate the suggested changes to the position of the new school as suggested by the County Education Authority as well as the need to increase tree and landscaping cover on the eastern border of the site as requested by Historic England and the Council's Heritage Officer. The Local Highway Authority does not consider that the access points as shown are unsafe as referred to by the objectors to the scheme and meets the requirements of paragraph 32 of the NPPF in that safe access can be provided for all. Following discussions with the Local Highway Authority and on reviewing the comments of the local community, the 9 self-build properties are now proposed to be accessed from within the site and not off Meadow Lane which has overcome the potential issue of safety which would have occurred as that road is a narrow dead end single track country lane. Regardless of the above, it must be remembered that the internal layout of the site is currently indicative only, and it can be suitably designed and altered again at reserved matters stage to the necessary highways standards to meet the requirements of the Highway Authority.
50. The Local Highway Authority has considered the cumulative impact of this proposal and the other 4 schemes currently before the Council proposal both in terms of safety and congestion on the highway network in Thurston and they have come to the

conclusion that the impact of the 5 scheme if they all come forwards will be severe. However, the Local Highway Authority has made it clear that the NPPF requires all public bodies to try and resolve problems and they are confident that if all 5 developers work together those suitable and cost effective alterations can be made to the highway network to ensure that the impact does not become severe. The Local Highway Authority has assessed the road network and has suggested alterations and improvements to key areas of it (see the Local Highway Authority consultation response earlier in this report for more information) which all 5 developers have been asked to contribute towards through either a section 106 agreement or through the Highways Act. All 5 developers which include Pigeon have agreed to contribute towards the works as requested by the Highway Authority. For the Pigeon proposal, the Highway Authority is requesting £131,868 via a S106 agreement (excluding travel plan contributions which are in addition), and a further £69,788 under section 278 of the Highway Act. As such, the Local Highway Authority no longer considers that this proposal fails the requirements of paragraph 32 of the NPPF when considered cumulatively with the other 4 residential schemes as the impact with the alterations carried out to the highway network will no longer be severe in terms of safety. For the avoidance of doubt, the Local Highway Authority has not raised any objections to this scheme on congestion grounds and does not consider that that additional traffic and queuing as a consequence of this scheme can be considered to be severe to sustain a refusal of planning permission.

51. The Local Highway Authority identify that the scheme will offer sustainable travel options to local residents as additional pavements and bus shelters are proposed and these will link up to both existing facilities and those proposed on neighbouring sites by the other developers seeking at the moment to build houses in Thurston. This will help to improve accessibility on foot and via public transport and will ensure that the site is accessible to the local railway station. The Local Highway Authority is also recommending that the applicant is obligated via a S106 agreement to provide a travel plan to ensure that there are sustainable transport options available to the new residents of the scheme rather than just having to rely on their private cars to access local facilities.
52. Having regards to the specific and cumulative highway impacts of the scheme when considered in line with the requirements of paragraphs 21 and 32 of the NPPF the Local Highway Authority has had regards to the fact that in some locations, the impact of the granting of 827 dwellings will be severe on the highway network, but these impacts can successfully be mitigated by the works to the network as suggested. Having regards to the above, it is considered that the proposal complies with the requirements of policy T10 of the local plan and paragraph 32 of the NPPF, in that safe and suitable access for all people can be achieved and that cost effective improvements can be undertaken to the transport network to ensure that non-motorised modes of transport can be used to access local facilities.
53. Concerns by the objectors in terms of the impact of construction traffic on the surrounding highways network, can be controlled by the imposition of a suitable condition should this scheme be granted planning permission. As the application is in an outline form, the indicative layout shows that a suitable internal layout, which would be up to the County Council's highway standards, could be provided at reserved matters stage.
54. An objector has commented that the applicant is suggesting in his documentation that the speed limit adjacent to the site should be reduced from its current limit to 30mph and that this is a separate legal process that is outside this planning application. The Local Highway Authority has been questioned on this and they have

confirmed that this scheme and the 4 others have been designed and considered at the existing speed limit and that his comments are given on that basis. They advise that it would be in the public interest to alter the speed limit as suggested by the applicant and they are to take on this alteration under the relevant highway legislation to action it.

55. Having regards to the above, it is considered that this proposal is acceptable in terms of highway safety and complies with the requirements of paragraph 32 of the NPPF and paragraph T10 of the local plan as safe access can be provided for all.

Design And Layout [Impact On Street Scene]

56. Section 7 of the NPPF refers to design. Specifically, paragraph 56 states that good design is a key aspect of sustainable development; it should contribute positively to making places better for people. Decisions should aim to ensure that development will function well and add to the overall quality of the area, establish a strong sense of place, create attractive and comfortable places to live, work and visit, optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Furthermore it provides that development should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The NPPF goes on to state it is "proper to seek to promote or reinforce local distinctiveness" (para 60) and permission should be "refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions" (para 64). In addition policy CS5 provides that "*All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area*" and echoes the provision of the NPPF. Policy GP1 provides design criteria that proposals should seek to achieve, to include; use of traditional materials that respect local architectural styles; use of open spaces to maintain or enhance the character of the site; protection of natural landscape features; suitable landscaping; sufficient parking, garaging and appropriate access arrangements; and opportunities to use the layout to minimise criminal activity. Policies H13 and CS9 also summarise separate criteria as to the design, layout, density and mix of housing developments.
57. Objections have been received stating that the site is currently an open field and that dwellings of the scale and density of the proposal, particularly in reference to any 2.5 to 3 storey dwellings potentially being built on site is considered to be inappropriate and not in keeping with the locality. The proposal will extend the built up footprint of the village into the surrounding open countryside which is unacceptable to the objectors and the parish council.
58. The application is in outline form and the plans as submitted provide an indicative layout of how the scheme could potentially look should this outline planning application be approved which relates to the principle of the development of the site. This indicative layout provides a development with a density of approximately 20 dwellings per hectare which is not high and is in keeping with existing patterns of development that adjoin the site. This site does extend the built footprint of the village into the surrounding open countryside as the fields that surround it are currently undeveloped with residential development limited to only the small amount of dwellings on Meadow Lane. However, the applicant has taken account of this and is using the Lady Greene Plantation and providing additional woodland screening and cover to its west and along the eastern corner of the site to help the proposal integrate into the Countryside. It is also noted in the consultation response from the Landscape Officer that the existing landscape envelope within and around the site

(combined with the proposed landscape mitigations proposed as part of the application) provide an adequate strategy to suitably reduce the visual impact of the development.

59. Objections have been received to this scheme on the basis that the needs of the elderly local community have not been considered and that there proposal is lacking in bungalows and smaller house types. It must be emphasised that the proposal is in outline form and full details of the housing specification will only be given at reserved matters stage. It must also be noted that the applicant has in his amended indicative layout plan shown additional bungalows and smaller properties which shows that they could meet the expectations of the community at reserved matters stage when the detailed layout of the site will be in for consideration. The applicant is not proposing a care home as part of this scheme as requested by one of the objectors to the scheme has requested and it is not considered to be appropriate to request that the detailed plans for the site should accommodate that type of use.
60. Having regards to the above, it is considered that the scheme in terms of its suggested layout constitutes good design in line with the requirements of the NPPF and local policy CS5 as it proposes a form of development that would reflects the character, density and appearance of the surrounding settlement. It is agreed that the site does project into the surrounding countryside; however this matter needs to be balanced in coming to a decision about the proposal having regards to all of the positive matters that the scheme brings. As stated in previous topics above, that will be done in concluding this report.

Parish Plan / Neighbourhood Plan

61. A Neighbourhood Plan designation was confirmed in 2013 and covers the Parish of Thurston. At the time of the consideration of this proposal the parish have set up a neighbourhood Plan Committee to prepare the policies for the new Neighbourhood Plan. Both the Parish Council and their Neighbourhood Plan Committee have objected to this scheme with the latter raising objections based on some of the early work that they have carried out for the evidence base for the new plan.
62. The Planning Practice Guidance identifies that *“Paragraph 216 of the National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan. The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals. And all representations on the proposals should have been submitted to the local planning authority by the close of the local planning authority’s publicity period. It is for the decision maker in each case to determine what is a material consideration and what weight to give to it”*.
63. As such, whilst it is ultimately for Members to determine the weight that should be given to the plan, whilst it is at an early stage in its development, it is the view of Officers that little material weight can be given at this time.

Landscape Impact

64. Paragraph 58 of the NPPF states that proposals should provide appropriate landscaping to ensure that they integrate well into the surrounding locality. This requirement is repeated in one of the requirements of policy H13 of the Mid Suffolk District Local Plan. The Lady Greene Plantation forms part of the site and is to be retained and additional landscaping is proposed along the northern and eastern boundaries of the site boundaries of the site. This is to ensure that an attractive landscaped buffer is provided between the scheme and the surrounding open countryside to minimise its impact.
65. Objections have been received to this proposal on the grounds that the site lies in an exposed location and that the approval of this scheme will erode the intrinsic beauty and the character of the surrounding open countryside. The Council's Landscape Consultant has been consulted on this scheme and he has commented that it will significantly change the visual character of the site which will change from agricultural to residential. However, they also advise that the Landscape Statement proposes a clearly considered green infrastructure which adequately mitigates the impact of the development. They also state that views to the development identified on the LVIA have been adequately mitigated through planting along edge boundaries and within the residential development helping to screen and filter those critical views. Whilst it is acknowledged that the scheme will have a significant impact on the surrounding open countryside, he does not object to it as its effects can suitably be mitigated to ensure that no unacceptable harm is caused in landscape terms.
66. Objections have been received to this scheme on the basis that the new dwellings will have an impact on the surrounding countryside in terms of light pollution. Paragraph 125 of the NPPF states that decisions should limit light pollution from artificial lights to limit the impact on local amenity, particularly on intrinsically dark landscapes.
67. It is agreed that the erection of up to 200 dwellings and a new school will cause increased lighting levels over what is now a dark field. However, it is suggested that a condition be imposed on the application to allow the council to consider and limit the impact of artificial lights on the surrounding open countryside to minimise the impact as far as is practicable. Having regards to the requirements of policy H13 of the MSDC Local Plan and paragraph 58 of the NPPF, it is considered that the scheme provides substantial landscaping both within and on the boundaries of the site to ensure that it assimilates well into the rural edge of Thurston and provides an attractive environment both for the new residents of the site and those living in the surrounding locality and artificial lighting can be regulated to minimise its effect on the surrounding open countryside.

Residential Amenity

68. Policies within the adopted development plan require, inter alia, that development does not materially or detrimentally affect the amenities of the occupiers of neighbouring properties. This requirement is emphasised in the NPPF Core Values in paragraph 17 where it states that all schemes should seek a good standard of amenity for all existing and future occupants of land and buildings.
69. This proposal is in outline form where there are no specific details of the exact location, orientation and types of houses proposed. There have been no objections to this scheme based on loss of daylight/sunlight or impact of overlooking and it is considered that if this outline consent is approved, these can suitably be considered and the scheme designed to mitigate the impacts at the reserved matters stage.

70. An objection has been received to this scheme on the basis that the erection of 200 new dwellings and a school will increase pollution levels in the village. It is agreed that emissions from the dwellings and the vehicles owned by the residents will increase, but as the site is in a village location in close proximity to the surrounding open countryside, this will cause less impact than if it was in an enclosed urban/city type area.
71. Further objections have been received to this scheme on the basis that the new dwellings will have an impact on neighbouring properties in terms of noise pollution. Paragraph 123 of the NPPF makes it clear that planning decisions should aim to avoid new developments giving rise to significant noise levels which would impact on the health and quality of life of existing residents. However, it should be noted that paragraph 123 does go on to say that it must be recognised that development will often create noise and as such some element of noise and disturbance is allowed. The closest properties to this site are on Meadow Lane and the applicant has now amended his suggested layout plan to remove the access points to them from Meadow Lane. The plans show the properties being set back and with suitable boundary landscaping which will help to offset the impact of the dwelling on the occupiers of the properties on Meadow Lane. Whilst the erection of 200 dwellings and a new school will increase noise levels in the locality, it is not considered that this will be significant enough to warrant a refusal of this scheme on loss of amenity grounds.
72. It is considered that this proposal does not give rise to any significant concerns of loss of neighbour amenity by reason of noise, form, design, the distance between the dwellings and the substantial landscaping that is proposed along the periphery of the site and as such the proposal meets the relevant NPPF core value in paragraph 17 and the requirements of paragraph 123. The environmental health officer has raised no objection subject to the imposition of standard conditions. Therefore, for the above reasons, it is not considered that there shall be any unacceptable impact in terms of residential amenity or safety (nor loss of important recreational space) and therefore the proposals comply with policy H16 and H17.

Environmental Impacts – Ecology, management of land, loss of agricultural land, contaminated land

73. The application site is a grade 3b agricultural parcel of land which is adjacent to the built up part of Thurston. As the site is in an agricultural use, there is limited tree cover within the site with the majority of the trees and hedging being along the field boundaries and in the Lady Greene Plantation to the north of the site.
74. Objections have been received to this scheme from local residents and the Suffolk Wildlife Trust on the basis that the loss of the field and the hedgerows on the boundary of the field to create residential development will have a negative impact on animal species, particularly protected and priority species in the locality.
75. Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) provides that all "competent authorities" (public bodies) to "have regard to the Habitats Directive in the exercise of its functions." In order for a Local Planning Authority to comply with regulation 9(5) it must "engage" with the provisions of the Habitats Directive.

76. The content of paragraph 118 of the NPPF is also applicable to the consideration of this proposal as it states that when determining planning applications, consideration must be given to 6 principles. The two following principles are applicable to this scheme:
- If significant harm is caused which cannot be avoided or mitigated by conditions then planning permission should be refused.
 - Opportunities to integrate biodiversity in and around developments should be supported.
77. The Council's Consultant Ecologist has been consulted on this application and she has not objected to it in terms of its impacts on protected species and has not raised any concerns about loss of hedgerow within the site. The Ecologist has however raised concerns that the proposal will result in the loss of Skylark habitat which is a UK and Suffolk Priority species and she has asked the applicant to provide mitigation in the form of two Skylark nest plots at another location away from the application site. The applicant has land in the area and he has agreed to this request. The mitigation strategy can be delivered via a S106 agreement.
78. The Suffolk Wildlife Trust has raised concerns over the management of the open space areas, particularly the sustainable drainage system within the site and what impact this will have on the ecology that establishes in there. The Council is not intending to adopt the landscaped areas within the site, but through a S106 agreement is requesting that the developer sets up a management company who will look after the open spaces and landscaped areas within the site, for the benefit of the new residents of the site and to ensure that its ecological value is retained and enhanced in future years.
79. Paragraph 112 of the NPPF states that local authorities should take into account the economic and other benefits of the best and most versatile agricultural land when making planning decisions. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use poorer quality land in preference to that of higher quality land. Agricultural land is split into categories with land defined as 3a up to 1 being best and most versatile land and grades 3b down to 5 not being defined as best and most versatile land. The application site is a Grade 3b and as such it is not defined as best and most versatile agricultural land and as such the requirements of paragraph 112 of the NPPF do not apply to this scheme. In any case, having looked at the agricultural land classifications for Mid Suffolk, most of the land within the district is classified as 2, 3a and 3b with very little land in the lower categories. As the district is predominantly rural in character it is not considered that the loss of this parcel of land either on its own or considered cumulatively with the 4 other sites that have been put forwards for development in Thurston will have a significantly negative impact on food production or the local economy.
80. The Council's Contaminated Land Officer has been consulted on this scheme and he has reviewed the documentation submitted by the applicant (Phase 1 risk assessment). Paragraph 121 of the NPPF makes it clear that planning decisions should make sure that the site is suitable for its new use taking account the hazards of any previous use. The Contaminated Land Officer has not raised any issues in relation to the agricultural field which the residential part of the scheme is to be sited on and only mentioned in his consultation response the small water feature in the wooded area (Lady Greene's Plantation) which has been filled in. However, he has advised that the risk from this is very small and that he does not object to it if

conditions are imposed requesting that the works on site be carried in line with the applicant's contamination report.

81. As the site is currently a field, subject to agricultural practices which could have included the spraying of crops with chemicals in the past, and part of the site appears to have been subject to historical landfill waste, a contaminated land report has been submitted to the council for consideration. The Council's Contaminated Land Officer in the Environmental Health team has reviewed the report and has advised that subject to the imposition of conditions, he does not object to the scheme. Therefore, it is considered that it is in compliance with paragraph 121 of the NPPF.
82. Having regards to the above it is considered that the proposal complies with the requirements of paragraph 112 of the NPPF in terms of agricultural land, its effects on Priority Species can be mitigated and the landscaped areas within the site can be adequately maintained in the future to protect their biodiversity value.

Heritage Issues (The Setting Of Neighbouring Listed Buildings)

83. Both the NPPF and Core Strategy place significant emphasis on safeguarding heritage as an important component of sustainable development.
84. With reference to the treatment of the submitted application, the Council embraces its statutory duties and responsibilities in relation to listed buildings, notably the general duties under sections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires the local planning authority to have "*special regard to the desirability of preserving [a] building or its setting or any features of special architectural or historic interest which it possesses*".
85. Recent case law on the application of the statutory duty acknowledges that the consideration of the impact of a proposed development on the significance of a designated heritage asset is a matter for its own planning judgement, but that the Local Planning Authority is required to give any such harm considerable importance and weight. However, where special regard to the desirability of preserving heritage assets has been paid and no harm is considered to be posed, the 'balancing' of harm (which should be given considerable weight as above) against public benefits as required by the NPPF, is not engaged.
86. Policy HB1 (Protection of Historic Buildings) places a high priority on the protection of the character and appearance of historic buildings, particularly the setting of Listed Buildings.
87. In paragraph 17 of the NPPF it makes it clear that development should "*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*". Para 131 goes on to state that "*In determining planning applications, local planning authorities should take account of; the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.*" Furthermore Para 132 states "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As*

heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”

88. Objections have been received to this scheme by members of the local community and by the Suffolk Preservation Society on the basis that the proposal is harmful to the setting of Manor Farm Barn which is grade II* listed and the converted barns to the north of this building which are also grade II listed. Manor Farm lies to the east of this site and is separated from the site by another field which has a hedgerow along its boundary running north south from Norton Road. The Preservation Society acknowledge that the impact on the listed building is considered to be less than substantial harm, but they would like to see the Council consider the impact to be significant when assessing this proposal.
89. Historic England and the Council's Heritage Officer have been consulted on the application. Historic England has raised concerns about the effect of the proposal on the significance of Manor Farm House as the loss of the agricultural land would result in the diminution of its context and setting as a farm house in an agricultural environment. However, they have not objected to the scheme and pass on the decision of what level of harm to apportion to this scheme to the council.
90. The Council's Heritage Officer has considered this proposal and he has not objected to the scheme. He makes the point that Manor Farm does not succeed an earlier building on site and that it is not as old as you would expect and as such its agricultural surroundings make a less important contribution to its significance than would be the case for a traditional farm house. He further adds that the barn complex which is also listed has been converted to residential and development relating to the keeping of horses has also occurred on site which further erodes the agricultural character of the land between the buildings and this site.
91. The Heritage Officer goes on to explain that in his opinion, the change from farmland to residential and school use would represent a degree of harm in the spacious rural setting of the listed buildings, but because of the factors referred to above the level of harm resulting to the significance of the listed buildings is considered to be low. In accordance with NPPF paragraphs 129, 132 and 134 in determining this proposal the Council needs to consider whether this harm can be avoided or minimised, and whether it is justified in terms of public benefits. The Historic Offer also asks whether the layout of the site can be altered to allow for a strong green buffer along the eastern boundary of the site which would serve to sustain a more rural character in the setting of the listed building.
92. The applicant has had to amend his layout to take account of the need to alter the position of the new school and he has taken the opportunity to strengthen the landscaped boundary on the eastern side of the site in line with the comments of the Heritage Officer to help to minimise the impact of the scheme on the adjacent listed buildings.
93. Having regards to the above, it has been identified that the proposal will cause less than substantial harm to the adjacent listed buildings, including the Church of St Peter, with the Council's Heritage Officer assessing the level of harm with the mitigation proposed to be low. Paragraph 134 of the NPPF requires the Council to weigh the harm (regardless of what level it is assessed at) against the public benefits of the scheme. It is considered that as the Council does not have a 5 year supply of housing as required by paragraph 47 of the NPPF that the proposal will help to contribute towards this deficit by providing up to 200 new dwellings which will provide public benefit. The scheme will also deliver 35% of the dwellings as affordable houses to help to meet the need in the locality and further contributions which cover

matters such as a new primary school and pre-school facility, the provision of land for the primary school as well as the provision of CIL money to facilitate a bid for improvements to the doctor's surgery, local library and safety works at the Thurston Railway station. The scheme will also contribute towards improvements to the highway network in and around Thurston to ensure that the road network remains safe for its users. The scheme will bring with it public benefits also in the form of construction related jobs and also additional residents to help sustain and grow local services and businesses.

94. As such, it is considered that the public benefits of this scheme are such that outweigh the less than substantial harm that has been identified to the setting of the listed buildings and, therefore, the scheme can be supported on heritage grounds.
95. As there are 5 different applications for major housing development in the northern part of Thurston, the Council's Heritage Officer has been asked to consider the cumulative impact of this scheme in relation to the others. Of the 5 applications, the application by Hopkins Homes for 175 homes on land adjacent to this site (application 2798/16 and appeal 5010/16) lies to the north of the Hopkins site and in combination with each other both schemes will have a cumulative impact on the setting of the listed buildings. It is considered that the other 3 sites are too far removed from the listed buildings to cause impact and as such, the Heritage Officer has been asked to consider the cumulative impact of the Hopkins and Pigeon scheme together on the listed building previously referred to. He has stated that in his opinion the cumulative harm to the Grade II* Listed farm house would not be greater than medium and the harm to St Peter's Church would be somewhere between low and medium and as such it is up to officers in line with the NPPF to assess if the harm to the listed buildings is outweighed by the public benefits that the scheme brings as outlined in paragraph 134 of the NPPF.
96. The public benefit of this proposal when considered on its own is highlighted above, but when the above is considered cumulatively with the adjacent Hopkins site, which will also deliver additional houses, contributions towards a new school, including pre-school, highway infrastructure contributions and also provides CIL money to facilitate bids for library, doctor's surgery and railway station improvements, it is considered that the cumulative benefits of both schemes outweigh the low to medium harm that the proposals will have on the heritage assets identified in this report.

Environment And Flood Risk

97. Paragraph 100 of the NPPF makes it clear that inappropriate development in areas of flood risk should be avoided by directing development away from areas of highest risk. The contents of policy CS4 of the Mid Suffolk Core Strategy is in line with the requirements of the NPPF in terms of flood risk and carries significant weight in the determination of this application. In terms of flooding from rivers, the site complies with local and national policy as it lies in a flood zone 1 area which is land at least risk of flooding. To deal with surface water, the applicant is proposing a pond filled with reed within the north east corner of the site with the surface water flow from the site channelled into it.
98. Objections have been received raising concerns that the development of the site may cause localised floods in the area. Anglian Water and the County Flood and Water team have been consulted on this proposal and both organisations have advised that they do not object to the scheme subject to the imposition of a condition requiring additional technical details relating to the submitted drainage strategy.

99. Due to unprecedented level of growth currently suggested for Thurston, the Environment Agency, County Flood and Water team and Anglian Water have been specifically asked to consider the cumulative impact of this proposal on drainage, flood risk and water supply grounds. They have advised that an increase of 827 dwellings with the mitigation measures proposed by the applicants will not increase flood risk in the locality to an unacceptable level. Confirmation has also been received that there is capacity in the local pumping station to serve 827 new dwellings in terms of sewage needs. Thurston lies in an area where water supply can be an issue, however Anglian Water has a duty by law to supply new houses with a water supply and this is a matter for them to resolve under their legislation.
100. Having regards to the above, it is considered in terms of flood risk, drainage, water supply and drainage that the scheme when either considered singularly or cumulatively can be made acceptable subject to the imposition of a suitably worded condition to meet the requirements of paragraph 100 of the NPPF and policy CS4 of the Mid Suffolk Core Strategy.

Infrastructure - Planning Obligations / CIL contributions

101. Objections have been received to this scheme on the grounds that the local infrastructure, which includes the local schools and health care, is insufficient to meet the need of the residents of this proposal. Comment has been made that if the scheme is approved without suitable provision, then it will cause significant impact on the existing community of Thurston.
102. The Council has now implemented CIL which accordingly takes on board requirements such as open space contribution, NHS and education contributions.
103. As part of this proposal contributions can be sought under the Council's CIL Scheme for improvements to the following:
- For the future expansion of the doctor's surgery in Moreton Hall which the residents of this scheme would use.
 - For improvements to the local library provision.
 - Safety improvements to the Thurston Railway station.
104. Objections have been received to this scheme on the grounds that a new doctor's surgery will not be provided and that the scheme will only provide 'contributions' rather than actual facilities. It should be noted that the Primary Care Trust (PCT) has made it clear that due to the existing situation with doctors, their salaries and contracts and the government's policy in terms of the NHS that a new doctor's surgery will not happen in Thurston as part of any of the 5 schemes. The PCT will be requesting contributions through CIL in relation to all 5 schemes and the monies will be used to improve the service offered and/or improve the facilities at the Woolpit Surgery and at the Park Farm Surgery in Moreton Hall to meet the expected needs of the additional residents of the new dwellings in Thurston. The PCT has not referred to the Ixworth Surgery in their consultation responses as suggested that they should by an objector, but are satisfied that the demand from Thurston can be accommodated at the Park Farm and Woolpit surgeries.
105. An objection has also been received on the basis that the scheme will put more pressure on the emergency services in the area. However, it must be remembered when additional dwellings are built, these become the subject of Council tax. The

emergency services levy precepts as part of the Council Tax and these will be used towards providing a level of service that is needed to cater for the needs of the residents of the new housing developments.

106. It has been identified following discussion with the County Infrastructure Officer that as suggested by the objectors and the Parish Council, there is no capacity in the local primary school to expand and as such a contribution of £82,450 is required towards the building of a new 420 place two form primary school either on this site or the persimmon site elsewhere in the village. It has also been suggested that a further £166,660 is required for the provision of new pre-school, which will be accommodated at the new school to help meet the demand generated by this development. As the CIL 123 list does not include the provision of new pre-school or primary school facilities (it only covers extensions to existing establishments) these contributions will have to be sought under S106 of the Planning Act and the applicant has agreed to the above payments. This application is one of two in Thurston at present which is proposing to include land for a new school as part of its proposal for residential development and the County Council is working with both developers to secure both sites. The County Council will decide which of the two sites it prefers in terms of accessibility and the County has confirmed that it will return the site that it doesn't want to the developer for them to consider in discussion with the Council what may be appropriate to go on this land. The Pigeon application proposes a 3 Ha site for primary and pre-school purposes thereby providing the required 2.2 hectares required for a 2 form entry primary school with pre-school and an additional 0.8 hectares to cater for any future expansion.
107. Whilst the new school is being built, it has been suggested that the existing school will be provided with two temporary classrooms funded via CIL to cope on a 2 to 3 year period with the increase in pupils generated from the first phase of new housebuilding in Thurston (from any of the 5 sites currently under consideration) until the new school is built. Once that happens, the existing school will be closed and the existing pupils moved over to the new school and the new school will be extended as appropriate up to a capacity of 420 pupils to accommodate the primary school age children arising from any of the proposed housing sites in Thurston. It is understood that the Diocese who own the primary school have committed to investing the capital receipt that they receive for the development of the existing school site into the new school which is also to be funded by a joint contribution by all 5 of the developers proposing major housing schemes currently in Thurston.
108. Following further dialogue with the County Obligations Manager it is understood that progress is being made to secure options on the potential school sites proposed in other applications. The delivery of a new primary school is a necessary pre-requisite to mitigate the potential pressure on education infrastructure from the development and it has been agreed that a restrictive phasing condition is not necessary given the progress that has been made on options. Nevertheless the securing of a primary school site is a material consideration upon which the delivery of this development is predicated.
109. The County Council has confirmed that there is capacity at all of the catchment secondary schools in the locality and as such a contribution is not warranted in that instance.
110. As is the case for new education buildings, affordable Housing is not part of CIL and members should note that policy to seek up to a 35% provision remains in effect. The applicant has confirmed that he is agreeable to provide a policy compliant scheme for affordable housing and that this will be achieved via a Section 106 contribution.

111. Network Rail has been consulted on this scheme and has asked for a contribution of £1million through a S106 agreement between all five developers to close the existing level crossing and to provide safer and improved facilities at Thurston Railway Station having regards to the increased use of the facilities that will occur from the residents of the proposed 827 dwellings. The Council's CIL 123 list includes provision for improvements to transport infrastructure. As such it is considered that it would be appropriate for Network Rail to bid for the specified amount to make the improvements they have requested to improve pedestrian safety at the station under the CIL scheme.
112. The Local Highway Authority has, as stated earlier in the report, asked for £131,868 under section 106 of the Planning act (with Travel Plan contributions in addition to this) to pay for Pigeon's part of the contribution for works to the highway infrastructure to ensure that the impact of approving all 5 housing schemes totalling 827 houses in Thurston is not severe on the highway network as referred to in paragraph 32 of the NPPF.
113. It is noted that within the application site there are large expanses of open space and landscaped areas and concerns have been received from local residents over how these will be maintained. This will be done via a S106 agreement whereby the developer has to employ a management company to look after this land. None of it is to be transferred to the Council or the Parish Council as part of this or any of the other 4 schemes.
114. Having regards to the above, in accordance with the Community Infrastructure Levy Regulations, 2010, the obligations recommended to be secured above by way of a planning obligation deed are (a) necessary to make the Development acceptable in planning terms (b) directly related to the Development and (c) fairly and reasonably relate in scale and kind to the Development.

Other Issues

115. Objections have been made to this scheme on the grounds that some of the residents of the existing dwellings will lose their views of the surrounding open countryside and all of the new housing schemes together will drive down local house prices. The law courts have determined that these objections are not material planning considerations and they cannot be used in making a decision on this scheme.

Details Of Financial Benefits / Implications (S155 Housing and Planning Act 2016)

116. Council Tax payments from the dwellings when built
 Planning Delivery Grant from Central Government for delivering the dwellings
 S106 Agreement:
- £821,450 is required towards the building of a new primary school in Thurston.
 - £64,700 towards the cost of the land to provide the new primary school.
 - £166,660 is required for the provision of new pre-school facility in Thurston
 - £131,868 is required for highway infrastructure works
 - Travel Plan Evaluation and Support Contribution - £1,000 per annum for a minimum of five years or one year after occupation of the final dwelling, whichever is longest.
 - Travel Plan Implementation Bond.

- CIL payments per dwelling built on site.

PART FOUR – CONCLUSION

Planning Balance

117. The proposal for residential development on land at Meadow Lane/Norton Road in Thurston is considered to be contrary to the adopted Mid Suffolk Core Strategy as the application site lies within the countryside outside the built framework of the settlement of Thurston on what is open agricultural land.
118. However, as the housing policies in the Core Strategy are out of date due to the Council not having a deliverable five year supply of housing, this scheme falls to be considered in relation to paragraph 14 and 49 of the NPPF which relate to residential development and sustainable development.
119. Paragraph 14 states that where the development plan for the area is out of date permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole or specific policies in the NPPF which indicate that the development should be restricted. Whilst it has been identified that the proposal either when considered on its own or in combination with the four other residential schemes that are with the Council for consideration will have an adverse impact on the quality of the landscape character of the area, and that it will result in the irreplaceable loss of countryside and has a low impact on the setting of listed buildings in the locality and have a potentially severe impact on parts of the highway network, it is considered that the benefits that the scheme brings such as the provision of 200 new housing of which 35% of them will be affordable, contributions towards local infrastructure such as the highways improvements, provision of open space and the new school that the appellant has agreed to contribute towards outweighs the negative issues.
120. Significant weight must also be given to the fact that there are no objections from the Council's consultees to the scheme. In relation to highway safety, the applicant has agreed to contribute towards mitigating the severe impact of the scheme. There are no objections in terms of design; crime prevention; amenity; pollution; contamination; ecology; landscape; flood risk and drainage. The proposal will also help to deliver construction jobs and will also provide more residents who will help to sustain and potentially grow the local economy.
121. In relation to highways impacts there are road safety impacts which can be addressed through mitigation at Fishwick Corner and other highways infrastructure improvements which weigh in favour of the scheme by providing enhanced sustainable links.
122. There remains a road safety and capacity issue at the A143 Thurston Road junction (adjacent to The Bunbury Arms). A number of solutions have been investigated and the current preferred solution is traffic signals. The highway authority consider that the effects of the development can be mitigated but further detailed work needs to be

undertaken to obtain the most practicable and viable solution to address the risks. For this reason Committee is asked to reach a “minded to” resolution which reserves the local planning authorities position pending the outcome of that detailed further investigation and junction design. Once the outcome of this investigation is known the application can be reported with a substantive recommendation to Committee.

123. Therefore, it is considered having regards to paragraph 14 of the NPPF that the benefit the proposal brings outweighs the negatives. Furthermore, when assessing the proposal against the NPPF it is not contrary to its requirements as a whole and there are no specific policies within it that would restrict this development and as such it is considered that it constitutes sustainable development which should be approved planning permission without delay in line with the requirements of paragraph 14.

Statement Required By Article 35 Of The Town And Country Planning (Development Management Procedure) Order 2015.

124. When determining planning applications The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain how, in dealing with the application they have worked with the applicant to resolve any problems or issues arising.

125. In this case the planning authority has worked with the applicant to overcome highway objections to the scheme and to clarify issues relating to drainage and impact on listed buildings.

Identification of any Legal Implications of the decision

126. There are no known legal implications derived from the determination of this application.

127. The application has been considered in respect of the current development plan policies and relevant planning legalisation. Other legislation including the following have been considered in respect of the proposed development.

- Human Rights Act 1998
- The Equalities Act 2012
- Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
- Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
- The Conservation of Habitats and Species Regulations 2010
- Localism Act
- Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

RECOMMENDATION

That Committee express a “minded to” resolution, subject to the further investigation and reporting back of highway matters in relation to the A143 Thurston Road junction, on the following basis:

That the authority would be minded to delegate to the Corporate Manager - Growth & Sustainable Planning to grant full planning permission subject to the prior completion of a Section 106 or Undertaking on terms to his satisfaction to secure the following heads of terms:

- £821,450 is required towards the building of a new primary school in Thurston.
- £64,700 towards the cost of the land to provide the new primary school.
- £166,660 is required for the provision of new pre-school facility in Thurston
- 35% Affordable Housing to be transferred over to a Registered Provider
- To secure the provision of public open space to be managed by a dedicated management company
- £131,868 to secure off site highway improvement works as listed below:
 - Improvements to PRoW Thurston 001 between Meadow Lane and Ixworth Road. A contribution of £7111 on commencement of the 100th dwelling.
 - Improve PROW 007 (un metalled) north of Meadow Lane. A contribution of £16500 in commencement of the 100th dwelling.
 - Contribution towards extension of speed limit on Norton Road. A contribution of £4267 on commencement of any construction work on site.
 - Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction. A contribution of £21838 on occupation of the first dwelling.
 - Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £69,528 on commencement of any construction works on site.
 - Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road. A contribution of £12624 on commencement of the first dwelling.
- To secure a travel plan in connection with the scheme detailed as follows:
 - Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum 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
 - Travel Plan Implementation Bond – To be confirmed when a detailed application/Travel Plan is submitted. This will be used to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves
 - Full Implementation of the Travel Plan and its monitoring.
 - Provision of an approved welcome pack to each dwelling after first occupation.
 - Securing remedial travel plan measures if the agreed travel plan targets are not achieved
- Provision of Skylark Mitigation

- Setting up of a management company to look after the open space and Sustainable Drainage parts of the scheme.

and that such permission be subject to the conditions as set out below:

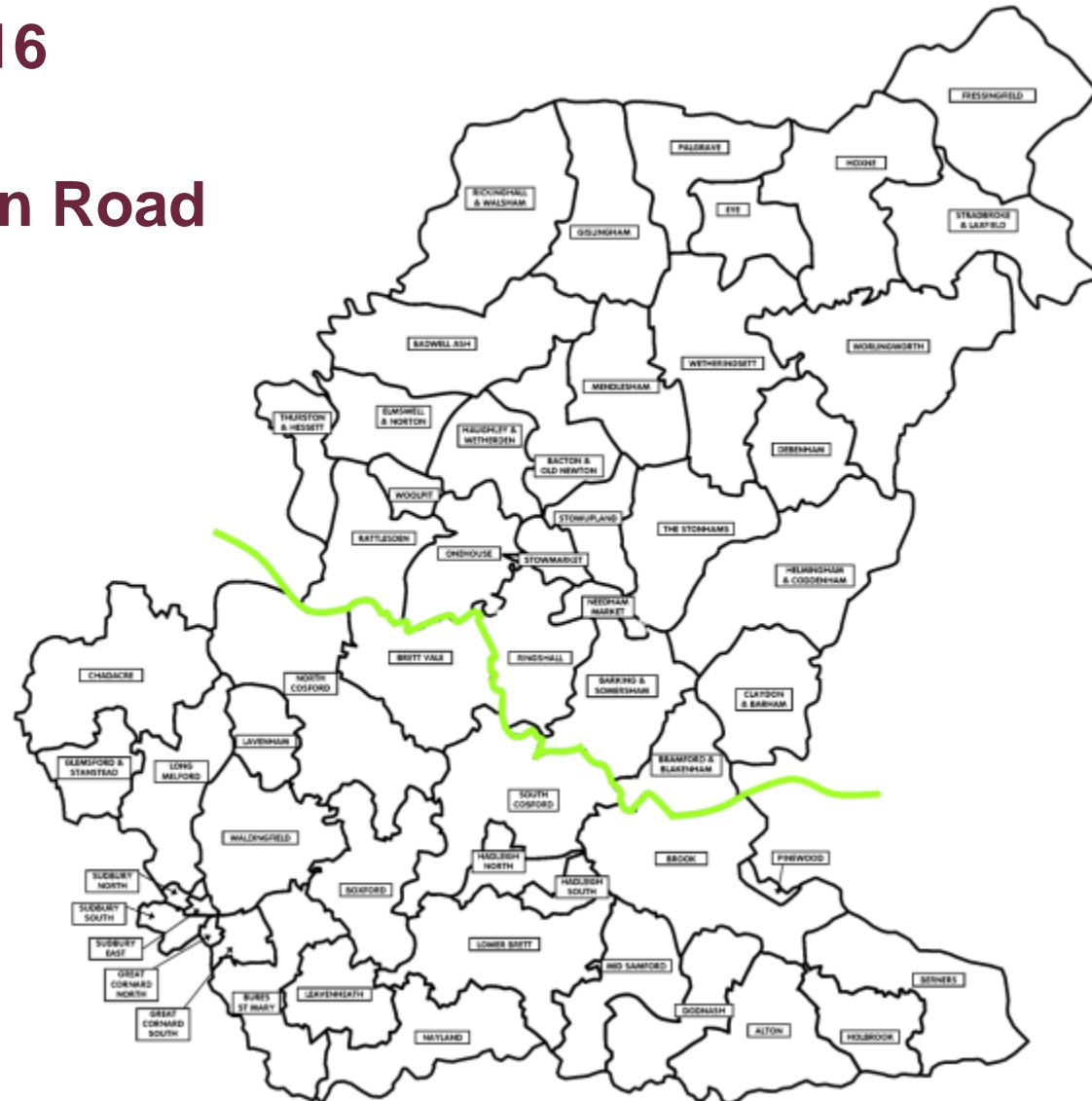
- 1) Two year time limit for submission of reserved matters (as opposed to the usual 3 years)
- 2) Reserved matters (outline)
- 3) Existing tree protection
- 4) Construction management agreement
- 5) External lighting
- 6) Commencement period for landscaping
- 7) Protection of birds during construction period
- 8) Works to be carried out in line with the ecological report.
- 9) Archaeology
- 10) Highway Conditions (covering site access and public highway, internal highway layout, footpath and cycle connectivity)
- 11) Surface water drainage
- 12) Implementation in line with recommendations of the ecological report.
- 13) Fire Hydrant requirements

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Application No: 5070/16

**Address: Land At Norton Road
Thurston**

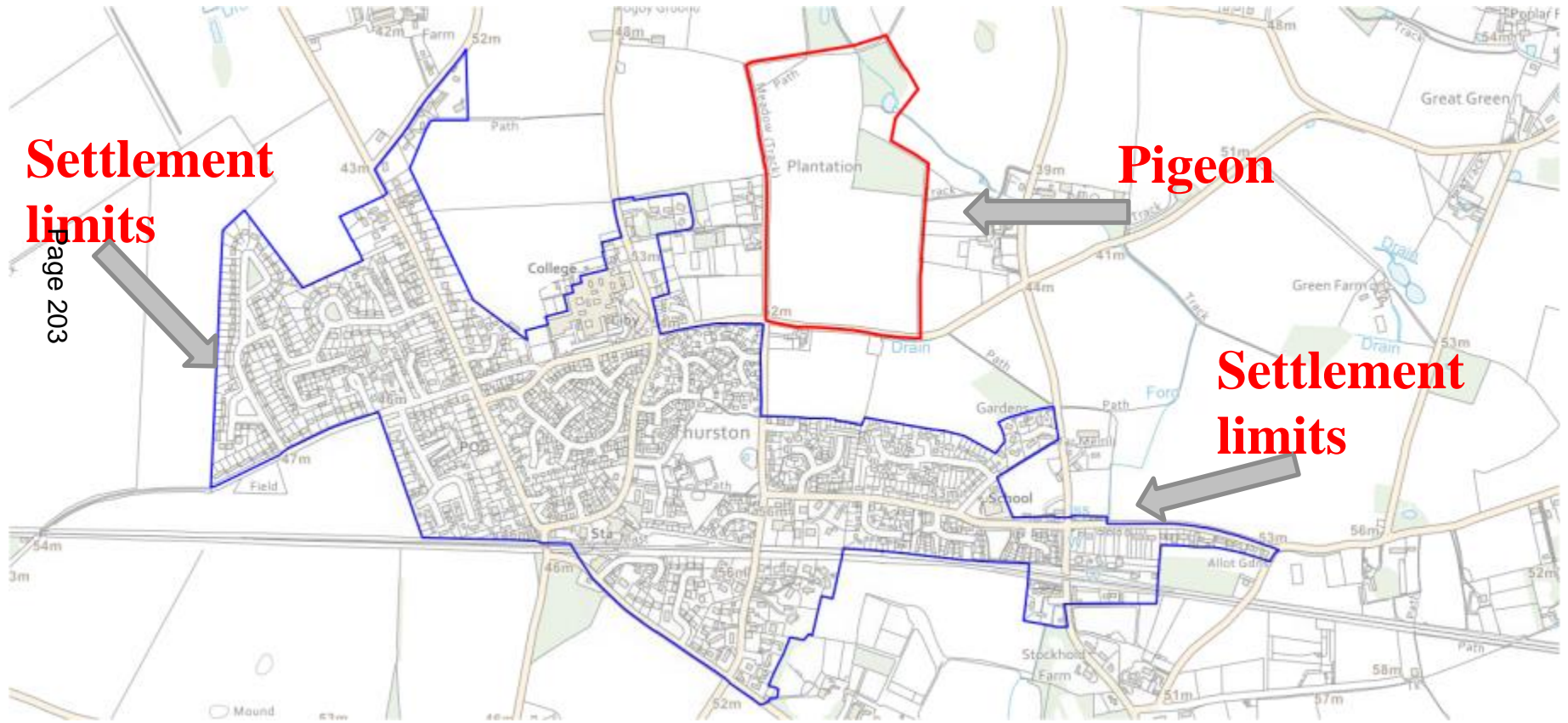
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Verbal Updates:

- Confirmation and summary of any 3rd Party representations received not previously issued to members.
- Confirmation and summary of any consultee responses received not previously issued to members
- Confirmation of any changes to recommendation, conditions or reasons.



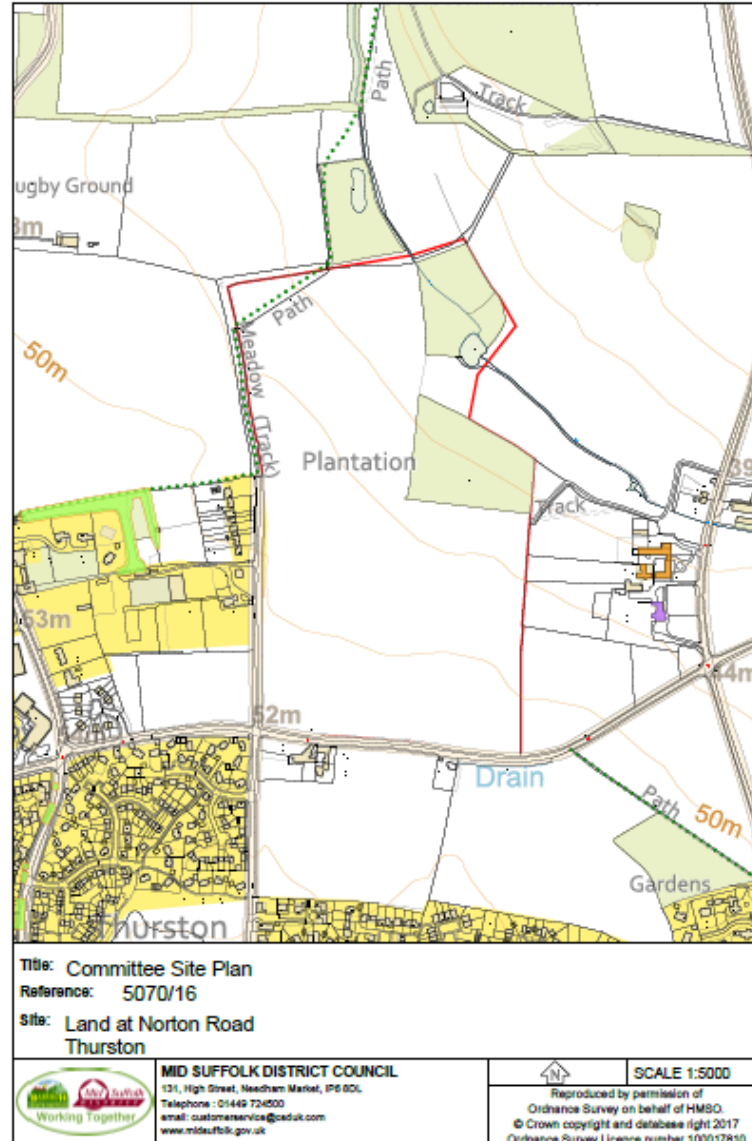
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Pigeon

**Settlement
limits**

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Site & Constraints Map



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From: Infrastructure Team (Babergh Mid Suffolk)
Sent: 16 January 2017 15:00
To: Planning Admin
Subject: RE: Consultation on Planning Application 5070/16
Importance: High

Community Infrastructure Levy (CIL) is assessed upon grant of Reserve Matters permission. If the self build plots fit the definition of self build as stipulated within the CIL Regulations 2010 (as amended) they could apply for exemption but they must ensure that all forms are submitted prior to the commencement of any part of the development as described in the outline application unless phasing could be applied to separate each self build plot from the rest of the rest of the development. #the relevant regulations that apply here are Reg 8 and Reg 54A.

Kind Regards,

Nicola

Infrastructure Team
Babergh and Mid Suffolk District Council – Working Together

Tel: 01449 724563

Consultee Comments for application 5070/16

Application Summary

Application Number: 5070/16

Address: Land at Norton Road, Thurston

Proposal: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

Case Officer: Dylan Jones

Consultee Details

Name: Mr Robert Boardman (Stowmarket Ramblers)

Address: 8 Gardeners Walk, Elmswell, Bury St Edmunds IP30 9ET

Email: bob@gardeners8.plus.com

On Behalf Of: Ramblers Association - Bob Boardman (temp cover)

Comments

I have viewed these plans and I have serious concerns that this very large development will totally swamp existing footpath no.7 which together with the lane makes a very pleasant walk to Pakenham.

From: RM Floods Planning
Sent: 23 January 2017 11:01
To: Planning Admin
Cc: Dylan Jones
Subject: 2017-01-23 JS Reply Land at Norton Road, Thurston Ref 5070/16

Suffolk County Council Flood and Water Management can make the following initial comments.

The theory for the proposals to dispose of the surface water from the site via a mixture of infiltration and a controlled discharge to a watercourse which is a tributary of a main river (Pakenham fen).

The applicant and planning authority need to address the following points though:

- 1) Who will adopt, manage and maintain each aspect of the surface water drainage system
- 2) Is the proposed depth of water and side slopes (*assumed 1:3*) in basin B acceptable (*would need a risk assessment*) so close to residential properties, if not is there enough space to enlarge it so that the depth of water is shallower and side slopes no greater than 1:4.
- 3) Will basin A provide enough interception and treatment in line with best practise e.g. Ciria c753 and SCC local Suds Guidance
- 4) Is it acceptable to have some soakaways spanning two or more dwellings

The applicant also needs to demonstrate that the proposed development site has an agreement in principle to have a continual right to discharge water from basin A into the watercourse and who will be responsible for this outfall.

| Pre-app | Outline | Full | Reserved Matters | Discharge of Conditions | Document Submitted |
|---------|---------|------|------------------|-------------------------|--|
| ✓ | ✓ | ✓ | | | 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 rd party agreement to discharge to their system (in principle/consent to discharge) |
| | | ✓ | | ✓ | Maintenance program and ongoing maintenance responsibilities |
| | | ✓ | ✓ | | Detailed development layout |
| | | ✓ | ✓ | ✓ | Detailed flood & drainage design drawings |
| | | ✓ | ✓ | ✓ | Full structural, hydraulic & ground investigations |
| | | ✓ | ✓ | ✓ | Geotechnical factual and interpretive reports, including infiltration test results (BRE365) |
| | | ✓ | ✓ | ✓ | Detailed landscape details |
| | | ✓ | ✓ | ✓ | Discharge agreements (temporary & permanent) |
| | | ✓ | ✓ | ✓ | Development management & construction phasing |

plan

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411

Resource Management
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

Enquiries to: Rachael Abraham
Direct Line: 01284 741232
Email: Rachael.abraham@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_5070
Date: 26 January 2017

For the Attention of Dylan Jones

Dear Mr Isbell

Planning Application 5070/16 – Land at Norton Road, Thurston: Archaeology

This large development site is located in an area of archaeological potential recorded on the County Historic Environment Record (HER). The possible site of Old Netherhall, the precursor to the later manor house at Pakenham, is situated within the woodland which forms the eastern section of the application area (THS 010). A Bronze Age urn was also recorded to the north-west of the development area (THS 003), with finds of prehistoric and medieval date also recorded in the vicinity (BSE Misc and THS Misc). As a result, there is high potential to encounter archaeological remains at this location. The proposed works would cause significant ground disturbance that has potential to damage any archaeological deposits and below ground heritage assets that exist.

This large site has never previously been subject to systematic archaeological investigation, however, we note that an outline application has been submitted for the site, which gives some flexibility in the final development design should significant archaeological remains be encountered at the site.

Therefore, on balance, there are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance

with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation (a 4% sample of the full development area) will be required to establish the potential of the site, **before approval of layout and drainage under reserved matters**, and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation. **We would strongly advise that evaluation is undertaken at the earliest opportunity.**

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

From: RM PROW Planning
Sent: 30 January 2017 15:48
To: Planning Admin
Cc: Christopher Fish; Claire Dickson; mail@beaconplanning.co.uk
Subject: RE: Consultation on Planning Application 5070/16

Our Ref: W523/007/ROW973/16

For The Attention of: Dylan Jones

Public Rights of Way Response

Thank you for your consultation concerning the above application.

This response deals only with the onsite protection of affected PROW, and does not prejudice any further response from Rights of Way and Access. As a result of anticipated increased use of the public rights of way in the vicinity of the development, SCC may be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Public Footpath 7 is recorded through the proposed development area and has a minimum width of 1.5m.

The proposed landscaping must allow a 1m corridor either side of the FP7 to ensure there is no encroachment by growth, causing an obstruction. The landscaping is the responsibility of the landowner to maintain.

We have **no objection** to this proposal.

Informative Notes:

Please note that the granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way.

Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. In order to avoid delays with the application this should be considered at an early opportunity.

The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team.

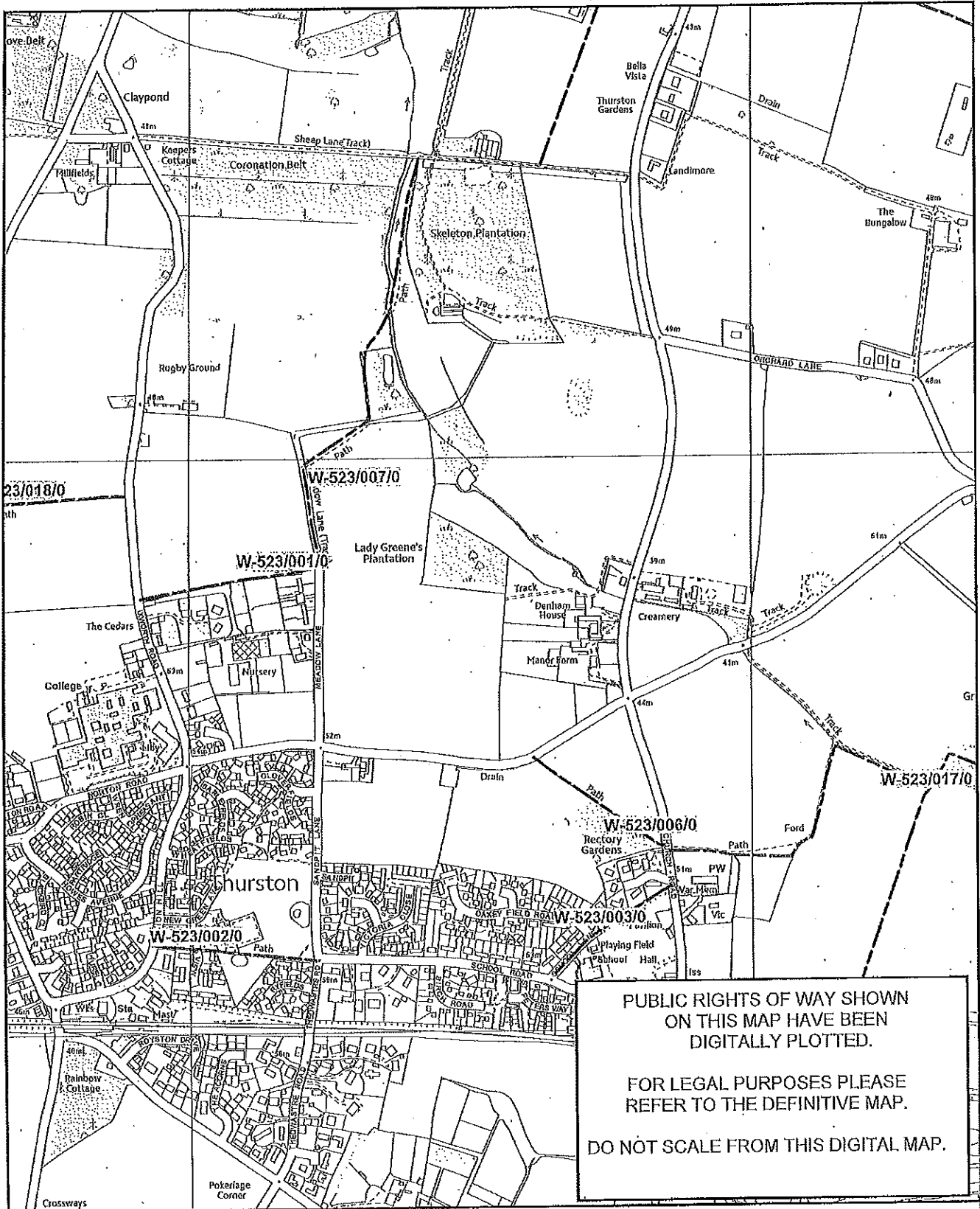
Nothing in this decision notice shall be taken as granting consent for alterations to Public Rights of Way without the due legal process being followed. Details of the process can be obtained from the Rights of Way & Access Team.

"Public Rights of Way Planning Application Response - Applicant Responsibility" and a digital plot showing the definitive alignment of the route as near as can be ascertained; which is for information only and is not to be scaled from, is attached for the applicant.

Regards

Jackie Gillis
Green Access Officer
Access Development Team
Rights of Way and Access
Resource Management, Suffolk County Council
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

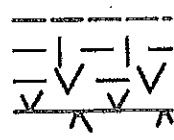
🌐 <http://publicrightsofway.onesuffolk.net/> | [Report A Public Right of Way Problem Here](#)



5070/16 Land at Norton Road, Thurston
Public Footpath 7



Resource Management
Endeavour House, 3 Russell Road, Ipswich, Suffolk. IP1 2BX



Ordnance Survey MasterMap

Public Footpath
Bridleway
Restricted Byway
Byway
Definitive Map Parish Boundary

Scale 1:7500



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Date: 30/01/2017



Environment
Agency

D Jones
Mid Suffolk District Council
Planning Department
131, Council Offices High Street
Needham Market
Ipswich
IP6 8DL

Our ref: AE/2017/121259/01-L01
Your ref: 5070/16

Date: 01 February 2017

Dear Mr Jones

OUTLINE PLANNING PERMISSION SOUGHT FOR THE ERECTION OF UP TO 200 HOMES (INCLUDING 9 SELF BUILD PLOTS), PRIMARY SCHOOL SITE TOGETHER WITH ASSOCIATED ACCESS, INFRASTRUCTURE, LANDSCAPING AND AMENITY SPACE (ALL MATTERS RESERVED EXCEPT FOR ACCESS) LAND AT NORTON ROAD THURSTON

Thank you for consulting us on this application which we received on 12 January 2017. We have no objection to the proposal and offer the following advice regarding flood risk, foul water disposal, an historic landfill and sustainability.

Flood risk

A small area of the north east corner of the site lies in Flood Zone 3. Using the site sequentially should be possible with either no development in this location or using the area for SuDS features.

The submitted information about flood risk demonstrates that the development will comply with the National Planning Policy Framework's policies on flood risk.

We recommend that all materials introduced to the floodplain are securely installed or fixed to reduce the likelihood of floating debris being produced during periods of high flows.

We have reviewed the submitted flood risk assessment with regard to tidal and fluvial flood risk sources only and recommend that the Lead Local Flooding Authority (LLFA) be consulted regarding surface water flooding and sustainable drainage for the development. LLFAs are now a statutory consultee for all major development proposals, providing technical advice on surface water drainage and SuDS.

Foul water

A foul water sewer is available in Meadow Lane. We expect developments discharging domestic sewage to connect to the public foul sewer where it is reasonable to do so. Where it is not reasonable to connect to the public foul sewer we will grant an environmental permit, as long as the proposed discharge is otherwise environmentally acceptable.

We also expect discharges of trade effluent to connect to the public foul sewer, where it is reasonable to do so, and subject to the sewerage undertaker granting a trade effluent consent or entering into a trade effluent agreement

The applicant should submit evidence to demonstrate that the sewage undertaker can accept the additional load from the development. You may wish to consider a suitable condition.

Landfill

There is an historic landfill 100m south east of the site described as Church Lane on our maps. We believe the landfill only received inert waste. On the 22nd of June 2007 we sent your Authority a CD containing historic landfill data which has all the information we hold on the historic landfill sites within 250m of this development proposal.

Sustainability

Climate change is one of the biggest threats to the economy, environment and society. New development should therefore be designed with a view to improving resilience and adapting to the effects of climate change, particularly with regards to already stretched environmental resources and infrastructure such as water supply and treatment, water quality and waste disposal facilities. We also need to limit the contribution of new development to climate change and minimise the consumption of natural resources.

Opportunities should therefore be taken in the planning system, no matter the scale of the development, to contribute to tackling these problems. In particular we recommend the following issues are considered at the determination stage and incorporated into suitable planning conditions:

- **Overall sustainability:** a pre-assessment under the appropriate Code/BREEAM standard should be submitted with the application. We recommend that design Stage and Post-Construction certificates (issued by the Building Research Establishment or equivalent authorising body) are sought through planning conditions.
- **Resource efficiency:** a reduction in the use of resources (including water, energy, waste and materials) should be encouraged to a level which is sustainable in the long term. As well as helping the environment, Defra have advised that making simple changes resulting in the more efficient use of resources could save UK businesses around £23bn per year.

- Net gains for nature: opportunities should be taken to ensure the development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.
- Sustainable energy use: the development should be designed to minimise energy demand and have decentralised and renewable energy technologies (as appropriate) incorporated, while ensuring that adverse impacts are satisfactorily addressed.

These measures are in line with the objectives of the NPPF, as set out in paragraphs 7 and 93-108. Reference should also be made to the Climate Change section of the draft National Planning Practice Guidance, in particular: "Why is it important for planning to consider climate change?" and "Where can I find out more about climate change mitigation and adaptation?"

<http://planningguidance.planningportal.gov.uk/blog/guidance/>

We trust this response is useful:

Yours sincerely



Mr GRAHAM STEEL
Sustainable Places - Planning Advisor

Direct dial 02 03 02 58389

Direct e-mail graham.steel@environment-agency.gov.uk

cc Beacon Planning Ltd

From: Christopher Fish
Sent: 02 February 2017 15:58
To: Dylan Jones
Subject: Re: Consultation on Planning Application 5070/16

Dylan,

I regret that I am not going to be able to respond as requested by today, partly because of an unusually high case load at present but also due to the need to assess the cumulative impacts of other pending applications. This work is ongoing and is being led by Steve Merry, Transport Policy & Development Manager for the area. We should, of course, try to respond fully as soon as possible.

Regards,

Christopher Fish MEng IEng
Senior Development Management Engineer, Transport Strategy, Strategic Development - Resource Management, Suffolk County Council, Endeavour House, 8 Russell Road, Ipswich, IP1 2BX Telephone: 01473 265924 Email: christopher.fish@suffolk.gov.uk Web site: <http://atrium.suffolkcc.gov.uk/ePlanningOHS/index.jsp>

From: Nathan Pittam
Sent: 03 February 2017 08:43
To: Planning Admin
Subject: 5070/16/OUT. EH - Land Contamination.

M3 : 188875
5070/16/OUT. EH - Land Contamination.
Land at, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Outline Planning Permission sought for the erection of up to 200 homes
(including 9 self build plots), primary school site together with associated
access, infrastructure, landscaping and ..

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that a Phase I desk study and risk assessment has been submitted in support of the application. The report has been produced by MLM Environmental dated 21st December 2016 (ref. 618211-REP-ENV-001). The report covers the historical use of the site and concludes that the only onsite risk is the potential for an infilled pond within the woodland area which is being retained as part of the development. I do not believe that the risk posed by this small area of potential infill that is to remain undeveloped is sufficient to enable us to require further works to be done by means of condition and as such I can confirm that I have no objection to the proposed development from the perspective of land contamination.

Should the applicant wish to undertake the advisory work as outlined in the MLM report we would be more than willing to review this documentation informally and hold this on record for information.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
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NEIGHBOURHOOD PLAN TEAM

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New Green Centre
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Councillor P Robinson
Chair of Thurston Planning Committee
Thurston Parish Council
New Green Centre
Thurston
IP31 3TG

Mr P Isbell
Corporate Manager, Development Manager
Mid Suffolk District Council
131 High Street
Needham Market
IP6 8DL

30th January 2017

Dear Cllr. Robinson,

5070/16 – Outline Planning Permission sought for the erection of up to 200 homes (including 9 self-build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access) @ land at Norton Road

Thank you for allowing the Neighbourhood Plan Team to comment on several planning applications that have been submitted to the Parish Council by a number of agents acting on behalf of Developers. The Neighbourhood Plan Team is aware that, with the submission of 6 applications (one is a duplicate) for a total of over 800 dwellings, Thurston is facing an immediate, exceptional planning issue. The Neighbourhood Plan Team is concerned that if the major applications now submitted are to be dealt with on an individual basis there will be a failure by the District Council to understand the cumulative impact such growth will have on the community of Thurston. It is also held that consideration of each individual planning application will not provide an appropriate response to the National Planning Policy Framework requirements nor to the impact on Thurston itself. It is for this very reason that the Neighbourhood Plan Team have concentrated their efforts at looking at the common issues facing each application as well as looking at the fundamental principle of development for each individual site and where provided, specifically the more detailed layout proposals and their impact given each location.

The Neighbourhood Plan Team would also like to state that in accordance with the Parish Council Protocol's for Pre Planning Application Developments – no comments on the suitability of the site for development or how the site performs in relation to others ahead of the site assessment work were made during the attendance of representatives from any of the Developers/Land Owners or their agents at Neighbourhood Plan Meetings and that whilst all applicants who attended such meetings had been informed that they could state that they had met with the Neighbourhood Plan Steering Group they could not in any forthcoming developer public meetings state that their proposals have in any way, shape or form, been endorsed by the Neighbourhood Planning Steering Group.

Whilst Thurston Parish Council is at a relatively advanced stage in preparing a Neighbourhood Plan and whilst the plan has not yet reached the final stage of allocating sites or proposing policies, following consultation with the public and land owners and agents on the site assessments carried out during Summer – Autumn 2016 it should be afforded some weight in responding to this application. The results of the site assessments as carried out under the Parish Housing Land Availability Assessment, has raised some issues which the Neighbourhood Plan Team feel are so major and fundamental that they must be taken into account by Mid Suffolk District Council in determining these applications.

A copy of all site assessment work can be seen within Thurston's Village website:
<http://thurston.suffolk.cloud/neighbourhood-plan/site-assessment-of-sites-for-development/>

The Neighbourhood Plan Team would like to state that it is disappointed at the speed at which this and other applications have been submitted for new housing in the village. There seems to be a general haste to ensure that each development is the first to submit with little regard for the cumulative impact that each development will have on the general infrastructure of Thurston which requires time to evolve and time to absorb new residents and associated growth. There is a general concern that the size of new developments being proposed will result in Thurston losing its 'village feel' and for it to become 'a small town'.

The Neighbourhood Plan Team is also disappointed that despite reassurances from Mid Suffolk that work on its Local Plan is proceeding, there is still no information being released as to the expected housing growth in the area and that work on the Councils Housing needs (Objectively Assessed Needs) is ongoing.

Given the scale of proposed housing development, the Neighbourhood Plan Team would request that the District Council adopts a cohesive approach that looks at the totality of applications and their impact on all of Thurston's infrastructure and social development. As way of emphasis the following table demonstrates the applications that are facing Thurston:

| Owner/Builder | Planning Reference | Status of application | Description of development | Number of dwellings |
|---|--------------------|--|--|---------------------|
| Playdri Products Ltd, Granary Site, Station Road | 2430/08 | Outline granted. Phase 2 delayed. | Remainder of site with blocks of flats. | 92 |
| Playdri Products Ltd, Granary Site, Station Road | 3181/13 | Preliminary work started on phase 1 in 2016. | Single building commercial centre with 9 flats above | 9 |
| Bovis Homes, Barton Road | 4386/16 | No decision Comments closed | Purely residential | 138 |
| Hopkins Homes, Sandpit Lane | 2797/16 & 5010/16 | No decision | Purely residential | 175 |
| Pigeon Developments, Norton Road | 5070/16 | No decision | Residential with 2 form entry primary school | 200 |
| Persimmon, Ixworth Road | 4963/16 | No decision | Residential with primary school (no size given) | 250 |
| Laurence Homes, Norton Road | 4942/16 | No decision | Purely residential | 64 |
| Possible number of dwellings to be added to Thurston | | | | 928 |

Regarding the common issues for all six applications submitted (4942/16; 4963/16; 5010/16; 5070/16; 4386/16 & 2797/16), the Neighbourhood Plan Team has broken these down into 4 main areas: Education; Housing and Transport and Social Challenges

- **Education:**

Currently primary education facilities are landlocked and full. Any future housing requires functioning primary education facilities before housing occupancy. The footpath and road network also needs substantial improvement to accommodate additional education provision. It is felt that multiple housing planning applications in Thurston demand a cohesive approach that looks at the totality of applications as well as individual consideration considering the impact of all of them on education and other infrastructure issues. In addition, Secondary students 11-16 currently attend Thurston Community College. Post 16 students are located in Beyton. It is understood that at some point in the future students may relocate to the Thurston site. Further secondary provision is available in both Ixworth and Bury St Edmunds. Suffolk County Council Education Department has indicated that were sufficient housing to be built in Thurston, Woolpit and Elmswell further secondary provision would be required somewhere along the A14 corridor.

Any significant housing would require additional primary education places. Suffolk County Council (letter from Peter Freer to Lisa Evans, MSDC) referring to Planning Application 2797/16 outlines its position:

'NPPF paragraph 72 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.'

'We currently forecast to have no surplus places at the catchment Primary School to accommodate children arising [from new developments], but there is some capacity at the Community College. The Primary School site is landlocked and cannot be expanded and the Community College has the largest secondary catchment in the County and is unlikely that expansion would be supported in the future. 'The County Council has been in discussions with the District 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.

'The anticipated approach to mitigate the impacts of housing growth in the area is to provide a new primary school which would incorporate the existing primary school. This new primary school would be constructed as a 315-place school initially, capable of being expanded to 420 places to meet future development. The estimated construction cost of a 420 place primary school is £6.9 million on a 2.2 hectare site.'

In addition, given capacity and legislative issues

'... the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 26 place setting, providing sufficient capacity for 52 children in total.'

The Thurston Neighbourhood Plan Team recognises and endorses the County Council position. New housing development on any scale in Thurston requires provision of a functioning primary school with early education places before the occupation of housing. There is no spare capacity in existing provision.

Any chosen location for a Primary School will have an impact on roads and footpaths in the village. There are major transport issues associated with the Community College. Over 25 coaches bring and take students to and from the College daily. The road network is under pressure: the coaches and parents' cars delivering and collecting students near the College create a daily problem. When there are parents' evenings, cars are parked inappropriately on footpaths, verges and close to road junctions.

In the current location, the Primary School presents associated pedestrian and vehicle concerns. In a new location, a larger school will bring added demands. Appropriate footways, road crossings, vehicle access (immediate and wider) and car parking will need to be accommodated. There is nowhere in Thurston that has current adequate provision to assimilate the pedestrian and vehicle movements particularly at the beginning and the end of the day in school term time.

- Housing

Thurston has received 5 planning applications over recent weeks from 5 separate developers. The total number of dwellings proposed by these applications amounts to 827 homes -- which would result in approximately a 64% increase in the current total housing stock of Thurston. These figures do not include the 2 applications at The Granary which add a further 101 dwellings to the tally. Should all applications be approved, there is a concern that not only will the village infrastructure be insufficient to cope, but the whole nature and ambiance of Thurston will change from that of a large vibrant village to that of a faceless dormitory town. The determination of these applications should be viewed as a whole if the development within Thurston is to be sympathetic and sustainable. Considering each application individually has the potential to allow by default considerably more development than the village could cope with.

A break-down of housing types and numbers (where known) is provided below:

| Site | Land west of Ixworth Road 4963/16 | Land at Norton Road 5070/16 | Land at Meadow Lane 4942/16 | Land south of Norton Rd 2797/16 5010/16 | Land west of Barton Rd 4386/16 | Land west of Ixworth Road 4963/16 | Land at Norton Road 5070/16 | Land at Meadow Lane 4942/16 | Land south of Norton Rd 2797/16 5010/16 | Land west of Barton Rd 4386/16 | Land west of Ixworth Road 4963/16 | Land at Meadow Lane 4942/16 |
|---------------------------|-----------------------------------|-----------------------------|-----------------------------|---|--------------------------------|-----------------------------------|---------------------------------------|-----------------------------|---|--------------------------------|-----------------------------------|-----------------------------|
| Bedrooms | Market Housing | | | | | Affordable Housing | | | | | Intermediate/shared equity | |
| 1 | | 6 | | | | | | | | | | 24 appts |
| 2 | | 4 terraced 12 bungalows | 6 | | 4 bungalows | | 9 bungalows 5 appts | | | | | 16 houses |
| 3 | | 25 semis 26 detached | 13 | | 3 bungalows 22 houses | | 3 bungalows 5 appts 12 terraced | | | | | 6 houses |
| 4 | | 31 detached | 17 | | 46 houses | | 31 semis 5 detached | | | | | 2 houses |
| 5 | | 18 detached | 6 | | 13 houses 2 4/5 houses | | | | | | | |
| Self-build | | 9 | | | | | | | | | | |
| Sub Total | 163 | 130 | 42 | 114 | 60 | 65 | 70 | 18 | 61 | 48 | | 22 |
| Total | 530 | | | | | 260 | | | | | 28 | |
| Final total 827 dwellings | | | | | | | | | | | | |

NB: Types and numbers of dwellings are shown where they have been made available in the Planning Application.

Generally, all the proposed sites are situated on land currently used for agricultural purposes on the outer boundaries of the village. The Neighbourhood Plan Team having considered the agricultural classification of land upon which these sites are situated had been made aware that, based on the generalised 1:250000 maps, the best and most versatile land generally occurs to the north of the village. Whilst it is recognised that individual site classifications are usually fully determined following detailed field work, the Neighbourhood Plan Team is concerned that development is being proposed on the best and most versatile land. Furthermore, all of the sites that have been submitted under planning applications that have come forward, are situated outside the Settlement Boundary and face out onto open countryside. The visual impact of each proposed development on approaching the village will be significant and will have an impact on the existing character and appearance of the countryside.

In general, the sites are of a higher density than those in their immediate vicinity. The plans reflect housing more appropriate to an urban landscape rather than a rural village. Several of the proposals include 2.5 to 3-storey dwellings with ridge heights of up to 12m. No other housing of this type can be found nearby. All the sites have at least one boundary abutting existing bungalows, dormer bungalows or small cottages. The designs are therefore not in keeping with the scale, type or density of housing in their locality.

Feedback from the Neighbourhood Plan Survey indicates that residents accept the need for expansion but in a sympathetic and controlled manner in order that infrastructure can keep pace with demand. Furthermore, they expressed, inter alia, a desire for relatively small developments of up to 50 dwellings with open spaces which reflect those found in other parts of the village. The survey indicates that during the next 15 years, 47% of respondents would be looking for bungalow accommodation, 44% homes suitable for retirees and 17% for assisted living and care homes. The proposed plans do not reflect the residents' future needs and are not, therefore, considered to be sustainable. Neither do the applications reflect the continuing need for housing across all tenures and a growing need for affordable housing. The Ipswich Housing Market Area, Strategic Housing Market Assessment (SHMA) Document and 2014 Suffolk Housing Needs Survey all show that there is a high demand for smaller homes across all tenures

from those who maybe starting households to those who may be looking to downsize. The Enabling Housing Officer at Mid Suffolk in her response to Planning Application 4386/16 makes reference to the fact that affordability issues are the key driver for the increase in smaller homes and that there is a strong demand for one and two bedroom flats/apartments and houses.

The large number of dwellings proposed would result in a substantial increase in the number of motorized vehicles within the residential areas. The Neighbourhood Plan Team does not consider the plans take sufficient heed of on-site parking requirements. This failure will inevitably lead to overspill onto and congestion within adjacent roads.

- Transport

Thurston is situated inside a triangle of A roads, the base of which is the A14, the eastern side is the A1088 and the western side is the A143. The apex of the triangle is just north of Pakenham where the A1088 crosses the A143. There are no B roads inside this triangle. All the interior roads are just for local access and by-roads, which are not maintained by the council to a standard suitable for heavy traffic. Current potholes in some places are described as "a death trap for cyclists". Access to the A14 towards Bury St Edmunds is often via Fishwick Corner where Barton (New) Road makes a junction with Mount Road. This has already been found to be an accident-prone congested junction with current traffic flows. At the other end of Barton Road there is access to the A143 and this junction is also often congested and subject to accidents. All of the applications submitted fail to take into account the committed schemes within Bury St Edmunds, Ixworth and Stanton which will alter the traffic flows along these road networks.

The standard S2 single carriage way in each direction type of road, upon which the Transport Assessments base their computer models, is described as 7 m in width. The roads leading into and out of Thurston do not have consistent widths and can be as narrow as 4.3 m. Norton Road, Church Road and School Road have places, unencumbered by parked vehicles, where two cars cannot pass safely and vehicles have to draw right off the road if a bus or larger vehicle comes along. Furthermore the Grade II listed Railway Bridge on Barton Road warns high vehicles to drive in the middle of the narrow road to get through under the arch. While one footway varies in width from 1 m to only 0.7 m, the opposite one tapers to nothing at all. Currently there is only room for one way vehicle flow over the other railway bridge on Thedwastre Road and no safe footway for pedestrians, just a white line one metre from the wall. Thedwastre Road leads to the junction with Beyton Road where congestion in the morning is already well recorded.

The traffic in and around Thurston varies enormously depending on the time of day as the Community College, Beyton Sixth Form College and Ixworth Free School educate students from a wide area, with many students being carried in coaches twice a school day. Travelling through and to the Community College and the Village are Bus Routes TN112; TN114; TN118; TN120; TH140; TN144; TN161 and TN163. In the morning and afternoon 25+ coaches and numerous vehicles deliver and pickup students and have a negative impact on the flow of traffic along Norton Road, Barton Road and Station Hill. In the afternoon this congestion is more noticeable as the coaches arrive in 2 dedicated waves with early arrival by the second wave creating issues. Some routes have a note to coach drivers to approach the College via Station Road to avoid other blocks near the Post Office/village stores on Barton Road where there are usually cars parked, narrowing the road. Other buses, provide a service to Stowmarket to Bury St Edmunds via Beyton and a service from Stowmarket to Bury St Edmunds via Norton. Combined, these give an hourly service to people in Thurston in each direction throughout most of the day Monday to Saturday. The route in Thurston is via School Road, Church Road, Norton Road, Heath Road, Genesta Drive and Barton Road. This means that in addition to the school transport at peak times, buses are travelling through the village throughout the day. Furthermore on a Monday to Saturday there is a bus service to Diss which stops outside Thurston Community College at 0855 and arrives back in Thurston (opposite Community College) at 1605.

From Monday to Saturday, there are hourly train services in each direction throughout the day, generally at 29 minutes past the hour to Stowmarket and Ipswich (east), and 12 minutes to the hour to Bury St Edmunds and Cambridge (west), with variations in the evenings and early mornings. There are slightly fewer trains on Saturdays. On Sundays and Bank Holidays there is a two-hourly service, but there are alternative two-hourly services to Ipswich and Peterborough from Bury St Edmunds. The main drawback to train travel for future growth for those unable to walk to the station is that there are only 12 official parking places provided and these are filled very early in the day. Cyclists also have only 1 cycle rack to hold 4 cycles and a notice telling them that only the official rack may be used. Overflow parking up Station Hill already happens. The rest of the Granary site is the subject of development plans belonging to a private developer and there is no room for the provision of extra parking. Of significant concern to the Neighbourhood Plan Team is the necessity for passengers having to walk across two tracks which carry non-stop passenger and goods trains to access one of the platforms. Although there is a siren the risk will be heightened the more footfall there is at the station. The Team is concerned that there are no plans to see improvements made to this station at a time when Network Rail are closing rural footpaths that

cross rail tracks due to the dangers posed, and yet this dangerous crossing, which has to be used every day by many including schoolchildren, is deemed to be safe.

The Neighbourhood Plan Team is concerned that, having viewed the documents still available on Mid-Suffolk's District Planning site for the development at the Granary, no Transport Assessment can be found, although a commercial centre will involve delivery vehicles as well as visits from customers, besides the trips made by the cars and vans used by residents of the proposed 100 or so flats.

The more recent planning applications from agents acting on behalf of Bovis Homes, Hopkins Homes, Persimmon Homes and Pigeon Capital Management 2 Ltd include lengthy Travel Assessments. All state that they have examined the traffic flow at various key junctions in Thurston at AM and PM peak times and supply all their data and name the computer programs they have used to calculate capacity and degrees of congestion. It is noted that the Laurence Homes application for 64 homes is apparently a borderline size which may not need an assessment.

It is also stated in the assessments that the key junctions were decided on in pre-application consultations with Suffolk County Council. These were often examined by more than one developer however the Neighbourhood Plan Team is concerned that none of them examined the flow over the narrow one-carriageway railway bridge on Thedwastre Road and that not all of the applicants included within their crash assessments included Fishwick Corner which has a higher proportion of incidences than other areas quoted.

| Developer | Road | Junction | AM 2016 | PM 2016 | Accidents 2010-2014 | AM Future | PM Future |
|--|-------------|---|------------------|------------------|-----------------------|-------------|-------------|
| Pigeon Developments | Norton Road | Peak traffic | 160→ | 110← | | | |
| Bovis Homes | Barton Road | | A | A | | +29% | +29% |
| Pigeon Developments Hopkins Homes | | Norton Rd/ Church Rd/ Pakenham Rd | A | A | | A | A |
| Pigeon Developments Hopkins Homes | | Norton Rd/ Sandpit Lane/ Meadow Lane | A A | A A | | A A | A A |
| Pigeon Developments Persimmon Homes Bovis Homes Hopkins Homes | | Barton Rd/ Station Hill/ Mini Roundabout | A B A B | A A A B | 1 Slight 1 Serious | A A B | A A C |
| Pigeon Developments Hopkins Homes | | Beyton Rd/ Thedwastre Rd | D B | C A | | D D | C A |
| Pigeon Developments Persimmon Homes Bovis Homes | | Barton Rd/ Norton Rd | A A B | A A A | | A A B | A A A |
| Persimmon Homes | | Ixworth Rd/ Norton Rd | C | A | | C | B |
| Bovis Homes | | Barton Rd/ A143 | D | F | 5 Slight 1 Serious | F | F |
| Bovis Homes | | Barton Rd/ Beyton Rd | C | A | | D | C |
| Bovis Homes | | Barton Rd/ Pakenham Rd | B | A | | B | A |
| Bovis Homes | | Barton (New) Rd/ Mount Rd | D | B | 7 Slight 1 Serious | F | B |

Using the data provided in the various individual assessments which were undertaken on different dates, the two roads and most of the junctions were recorded in AM and PM as "A" which means Free Flow. "B" is Reasonably Unimpeded. "C" is Stable, "D" is Lightly Congested, "E" is Significantly Congested and "F" is Heavily Congested. The after-development estimates were taken to be in 2021 except Bovis Homes who used 2023. Where different arms of a junction had different levels of flow, the highest was recorded above. It is noted that these records show only a slight increase in congestion after the development has gone ahead. However none of these estimates of future traffic took the other proposed developments into consideration only "background growth" and again the Neighbourhood Plan Team is concerned at the cumulative impact all of the developments would have on the current infrastructure.

Currently, with none of these developments completed, the surveys showed congestion points for commuters leaving Thurston for the A14 and A143 at the edges of the village. Thedwastre Road has the one carriageway railway bridge and its junction with Beyton Road on the way to the A14 is shown already as lightly congested. This involves a long queue of vehicles every morning, Monday to Friday at the junction. The mini roundabout near the station is the most likely junction to become more congested when the Granary development, which has already been passed by the planners, is completed. Records indicate that there have already been accidents there. This route leads to the Grade II listed railway bridge where passage is narrow, the road surface is often flooded, the footways are too narrow to be safe and it is another route to the A14, via Mount Road with a junction that is already highly congested with a record of accidents. At the other end of Barton Road the junction with the A143 is already heavily congested and accident-prone.

The Neighbourhood Plan Team recognises that current guidelines on rural traffic in general and in particular TA23/81 which gives official advice on new road developments, emphasises that rural roads should not be planned to carry more than 75% of their capacity, whereas urban roads are acceptable at 85%. This recognises the difference in quality and ambience between rural and urban living. Urbanites may balance long queues of traffic at peak times against shorter routes to work and more amenities close at hand. Village dwellers know how to duck and weave round huge agricultural vehicles travelling along narrow and winding roads and they pull up and give way with a wave, but they don't expect to have urban conditions of continuous traffic flowing through the village, even if it is a smooth flow as judged by most of the assessments done for Thurston. Villagers expect clean air, the opportunity to cross roads on foot without a long wait and the chance to hear birds singing rather than the continuous drone of traffic.

The Neighbourhood Plan Team recognises that Paragraph 17 of the NPPF is given as the justification for planning applications to be accompanied by a Transport Plan as well as a Transport Assessment: "Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."

Following the recommendation by Suffolk County Council, Persimmon Homes, Bovis Homes, Pigeon Developments Ltd and Hopkins Homes have each prepared their Transport Plans. These plans emphasise the opportunities for using public transport, walking (up to 2 km) and cycling. Their aim is clearly to try and reduce the use of private cars, as the plans involve employing someone to monitor the use of private cars in and from the development over a period of five years or so. This would be an intrusion into the private lives of residents which they would have to pay for in the price of the development. The Cycle Trail 51 which is widely quoted is very misleading and should be noted that within the village there is only a short distance along Station Hill and across New Green where it is marked on the ground and separated from other traffic. Children would not be safe to follow it on their own as to access this separated route, they would need to travel along Norton Road and over the crossover close to the junction with Norton Road/Ixworth Road/Station Hill. It should also be noted that should cyclists wish to travel east up Station Hill from Barton Road there are no safe crossing points onto the cycle route and that to access this point, Station Hill would need to be crossed on a bend on a steep hill with poor visibility.

The Neighbourhood Plan Team is therefore concerned that although some of the new applications propose small improvements to footways, crossings, bus shelters and the 30 mile speed limit on Ixworth Road, none of them can substantially improve the key junctions or the railway bridges where conditions will inevitably get worse with any extra traffic. The road system in Thurston was crystallised over a hundred years ago, based on the movement of mainly agricultural vehicles in a rural environment. The borders and junctions of these roads and the railway bridges fitted the traffic flows of that time. In many cases the borders are now built up so that roads cannot be widened and certainly the railway bridges are immovable. Each of the proposed developments would inevitably add more traffic despite efforts to wean people away from driving their own vehicles.

- Social Challenges

The Neighbourhood Plan Team is aware that with all growth the village faces a number of challenges and that whilst there are policies in place to ensure all developments provides a safe community; protects the environment from adverse impacts; reduces the level of crime or overcomes the fear of crime and provides a safe and secure environment, often the social impact of such growth is overlooked.

As such the Team has drawn up a list of the social challenges that will take place in Thurston with an increase in its population, the findings of which are replicated in the table below:

| Pros of increase in population | Cons of increase in population |
|---|---|
| <p>A new purpose-built primary school, more suited to the 21st century, would contribute to the life of the village.</p> | <p>A larger school will support more housing, which Developers will capitalize on. It will trigger more planning applications with family homes. Suffolk County Council work on 25 primary pupils per 100 houses, so there will be many more children which will affect the social dynamics of the village. Pupils will need appropriate cycle ways and paths to get safely to school, as our current school children do. The possible sites for a new school do not lend themselves so easily to safe walking or cycling. This is unfortunate, as it is valuable time for social interaction of children and parents.</p> |
| <p>Clubs and organizations for all age ranges will have increased numbers and for some this will help their sustainability. This includes the library and churches.</p> | <p>Newcomers to the village will put an extra strain on current organizations. If there are more problems with waiting lists it will give rise to bad feelings. Leaders will need support to ensure that they have enough resources to meet extra demands.</p> <p>The popular children's organizations of Brownies, Scouts and the ATC provide valuable social activities for the youth of the village. For the new children to feel welcome in Thurston and be able to have friendships outside school, it is vital that they are able to access such groups. Finding extra leaders and, possibly venues, will not be easy.</p> <p>The Cavendish Hall and New Green may be over-stretched, including their provision for parking. There will be many more demands on these venues with an increased number of young families.</p> <p>Sports clubs may need extra outdoor facilities. Footballers in the village have already highlighted the need for another pitch so this would be even more of a priority.</p> <p>There would be a rise in cycling on the primary traffic routes, which will also have an increase in vehicular movements, around the village for all age groups. A new larger primary school will increase the number of children cycling to school, but also those cycling as a leisure activity.</p> |
| <p>More residents would support a greater variety of leisure activities than are currently available in the village. Teenagers, particularly, could benefit from this and will find more support for a Skateboard Park.</p> | <p>Difficulties are as described above with leaders and venues.</p> |

| | |
|--|---|
| <p>A greater variety of shops and facilities would be supported, giving residents more choice of various facilities within the village. This could be helpful to elderly people who do not want to travel into town.</p> | <p>More shops and other facilities will change the village atmosphere to one of a small town.</p> <p>This will impact on the social dynamics of Thurston, which views itself very much as a village. Residents may resent the extra shops and facilities rather than welcome them. This will, again, give rise to bad feelings towards the new developments.</p> |
| <p>More residents would help to support and sustain bus and train services, which add to the choice of social activities outside the village.</p> | <p>The pressure on these services is expected to increase with additional use being promoted through each applicant's Travel Plan with the implementation of measures designed to promote sustainable travel. Young families may however travel by car which will see an increase on the current road infrastructure. Unless improvements are made to the car parking facilities at the Railway Station along with additional cycle facilities there will be a detrimental on surrounding residential areas</p> |
| <p>More pressure for a Doctor's surgery or Medical Centre.</p> | <p>Medical provision will be impacted within the health catchment area. Currently the nearest practice does not have sufficient capacity for additional growth resulting from further development. As currently stands NHS England is only looking for a Developer Contribution to increase capacity within the GP catchment area. This increase is unsustainable if all applications were to be determined favorably.</p> |
| <p>Additional footpaths and cycle ways arising from the new developments would offer more variety of routes for walkers and cyclists. This would help all residents to achieve a healthy life style.</p> | <p>Thurston takes a pride in its footpaths and natural environment. This is the result of well-known residents promoting the paths and looking after its trees and wildlife. A larger population which suddenly arrived in the village would not be familiar with these values and this could also give rise to ill feeling towards newcomers. Such concerns include people not following the country code while walking in the countryside, leading to friction with the landowners. Others are that more dogs may cause problems by being off the lead, worrying live-stock, damaging crops and disturbing ground nesting birds. There is also the matter of dog-mess which is already a cause of irritation if not dealt with correctly.</p> <p>The Suffolk Wildlife reserve at Grove Farm is situated within the Parish of Thurston where walkers can see different habitats, flora and fauna. The reserve can be part of a pleasant destination for leisurely walks and cycle rides. With an increasing population and more visitors, it will be necessary to ensure it is not at risk</p> |

As stated previously whilst the Neighbourhood Plan has not yet reached the stage of allocating sites or proposing policies, it has followed a period of extensive consultation with the public and land owners and agents on the site assessments carried out during Summer - Autumn 2016 following the Neighbourhood Plan Team's Call for Sites of January 2016, under the Parish Housing Land Availability Assessment. Throughout this process of consultation, the Neighbourhood Plan Team felt that as there were major and fundamental issues preventing sustainable development the site could not be submitted for detailed assessment and would not be considered further within the Neighbourhood Plan sites assessment work. It was felt that the site was very open and would encroach significantly into the countryside and that the site was separate from the settlement boundary.

The Neighbourhood Plan Team stands by the assessment given to this site and would ask the Parish Council to consider its major concerns for this application on this site for the following reasons:

- Separate from the settlement boundary

- Site encroaches into countryside
- Site is regarded as prime agricultural land
- road safety with emphasis on the junctions of Norton Road and Ixworth Road which is very close to the Community College at the AM and PM peak times.
- road safety issues with emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pokerlage Corner
- pedestrian safety along Norton Road for accessing village facilities as there are no safe crossing points
- impact of the vehicular movements from a double point of entry onto Norton Road.
- development inappropriate to that of land abutting the countryside
- impact on village infrastructure particularly education and health provision
- type and density of housing mix not in accordance with the Neighbourhood Plan findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people.
- cost of affordable homes for local residents – the application fails to take into account the District Wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.
- Proximity of and impact on Grade II* listed building Manor Farm House – visual and historic architectural
- Size of school being proposed – 2 form entry with the possibility of expanding to 3

In summary, whilst the Neighbourhood Plan Team recognises the need for future development to take place within Thurston it does not in any way support this application for the reasons mentioned above.

Moreover, given the scale of proposed housing development, the Neighbourhood Plan Team would ask that the Parish Council requests that the District Council adopts a cohesive approach that looks at the totality of the applications submitted and their impact on all of Thurston's infrastructure and social development.

Yours faithfully,

Victoria S Waples

Victoria S Waples, BA (Hons), CILCA
Secretary to Thurston Neighbourhood Plan Team

PARISH COUNCIL

Comments from: Thurston Parish Clerk

Planning Officer: Dylan Jones

Application Number: 5070 / 16

Proposal: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

Location: Land at Norton Road, Thurston

PLEASE SET OUT ANY COMMENTS AND OBSERVATIONS OF YOUR COUNCIL WITH REGARD TO THE ABOVE, BEARING IN MIND THE POLICIES MENTIONED IN THE ACCOMPANYING LETTER.

The Parish Council would like to register its strong objection to this planning application and asks that the attached letter be read in conjunction with this statement.

For Planning Applications only

Support

Object

No Comments

Mrs V Waples.....(Print Name)

on behalf of Thurston.....town/parish council

Dated..... 07.02.2017.....



Your ref: 5070/16
Our ref: 00048539
Date: 07 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Dylan,

**Re: Thurston, Land North of Norton Road (East of Meadow Lane) IP31 3QJ -
Outline Planning Permission sought for the erection of up to 200 homes
(including 9 self build plots), primary school site -**

There are now five live applications for planning permission on sites in Thurston. In view of these applications which add up to over 800 dwellings it is clear that the County Council needs to consider the cumulative impact implications on highways and education infrastructure in the locality.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC



Consultation Response Pro forma

| | | | |
|----------|---|---|--------------------------|
| 1 | Application Number | 5070/16/OUT- Land at Norton Road, Thurston | |
| 2 | Date of Response | 16 th February 2017 | |
| 3 | Responding Officer | Name: | Louise Barker |
| | | Job Title: | Housing Enabling Officer |
| | | Responding on behalf of... | Strategic Planning |
| 4 | Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | No objection | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>This is a development proposal for 200 residential dwellings and triggers an affordable housing provision requirement of 35% under altered policy H4 of the Mid Suffolk Local Plan (on development proposals of 5 units and over outside of Stowmarket and Needham Market) equating to 70 affordable housing units.</p> </div> <p>1. Housing Need Information:</p> <p>1.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2012, confirms a continuing need for housing across all tenures and a growing need for affordable housing.</p> <p>1.2 The 2012 SHMA indicates that in Mid Suffolk there is a need for 229 new affordable homes per annum. The Survey also confirmed that an appropriate affordable housing tenure split for the District is 75% rented and 25% low cost home ownership tenure accommodation.</p> | |

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.

| | | |
|--|--|--|
| | | <p>1.3 Furthermore the 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are a key driver for this increased demand for smaller homes.</p> <p>1.4 With an aging population, both nationally and locally new homes should, wherever possible, be built to Lifetime-Homes standards and this can include houses, apartments and bungalows.</p> <p>1.5 The Suffolk Housing Needs Survey also confirms that there is strong demand for one and two bedroom flats/apartments and houses. Developers should consider flats/apartments that are well specified with good size rooms to encourage downsizing amongst older people, provided these are in the right location for easy access to facilities. There is also a demand for smaller terraced and semi-detached houses suitable for all age groups and with two or three bedrooms.</p> <p>1.6 Broadband and satellite facilities as part of the design for all tenures should be standard to support.</p> <p>1.7 All new properties need to have high levels of energy efficiency.</p> <p>1.8 Studio and bedsit style accommodation is not in high demand.</p> |
|--|--|--|

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| | |
|--|---|
| | <p>2. Choice Based Lettings Information:</p> <p>2.1 The Council's Choice Based Lettings system currently has circa 844 applicants registered for housing in Mid Suffolk. Currently there are circa 18 applicants registered stating a local connection to Thurston. This site is a S106 planning obligation site therefore affordable housing will be to meet district wide need hence the 844 applicants registered is the figure to note.</p> <p>2.2 The district wide majority need on the housing register is for 1 and 2 bedrooms. There is also a smaller element requiring 3+ bedroom properties.</p> <p>3. Recommended Affordable Housing Mix:</p> <p>3.1 35% affordable housing on this proposal based on 200 units equates to 70 AH units.</p> <p>3.2 Based on the above information, the following mix with a 75%/25% tenure split is recommended:</p> <p>Affordable Rent Tenancy = 52 units as follows:</p> <ul style="list-style-type: none"> • 12 x 1b 2p flats @ 50sqm • 2 x 1b 2p bungalows @ 50sqm • 4 x 2b 4p bungalows @ 70sqm • 22 x 2b 4p houses @ 79sqm • 11 x 3b 6p houses @ 102sqm • 1 x 4b x 7p house @ 115sqm <p>Shared Ownership = 18 units as follows:</p> <ul style="list-style-type: none"> • 12 x 2bed 4p houses @ 79sqm • 6 x 3bed 6p person houses @ 102sqm <p>(Recommended nationally described space standards.)</p> |
|--|---|

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.

4. Other requirements for affordable homes:

- Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards
- The council is granted 100% nomination rights to all the affordable units in perpetuity
- The Shared Ownership properties must have an 80% stair casing bar.
- The Council will not support a bid for Homes & Communities Agency grant funding on the affordable homes delivered as part of an open market development. Therefore the affordable units on that part of the site must be delivered grant free
- The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice
- On larger sites the affordable housing should not be placed in groups of more than 15 units
- Adequate parking provision is made for the affordable housing units
- It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see www.midsuffolk.gov.uk under Housing and Affordable Housing for full details.
- AH dwellings must be tenure blind.

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| | | |
|---|--|--|
| | | <p>5. Open Market Homes Mix:</p> <ul style="list-style-type: none"> • There is a strong need for homes more suited to the over 55 age bracket within the district and supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. • It is noted that a number of bungalows/chalet bungalows are proposed and this is welcomed. • There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities. • The 2011 census shows 85.1% under occupied households in Thurston. (ONS 2011 Census: QS412EW). • It is recommended that there is a broader mix of open market housing on this scheme incorporating the majority of units as 1, 2 and 3 bedroom with a much smaller element of 4+bedrooms to reflect the above information. We would be looking for less 3, 4 & 5 bed houses and a greater amount of 2 beds than are proposed. |
| 6 | <p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p> | |

Please note that this form can be submitted electronically on the Council's 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 Council's website and available to view by the public.

| | | |
|---|-------------------------------|--|
| 7 | Recommended conditions | |
|---|-------------------------------|--|

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

Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
Info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

20/02/2017

Dear Dylan,

RE: 5070/16 Outline Planning Permission sought for the erection of up to 200 homes (including 9 self-build plots), primary school site with associated access, infrastructure, landscaping and amenity space (all matters reserved except access). Land at Norton Road, Thurston

Thank you for sending us details of this application, we have the following comments:

We have read the ecological survey report (Basecology, December 2016) and we note the findings of the consultant.

The site is largely bounded by hedgerows with trees. As identified in the ecological survey report these areas offer nesting habitat for bird species and foraging and commuting habitat for bats species. We note that it is unclear how much of the species rich hedgerows on the south and west boundaries are to be retained. The location and access to the self-build plots off Meadow Lane suggest the majority of this hedgerow will be removed. Hedgerows are a UK and Suffolk Priority habitat under section 41 of the Natural Environment and Rural Communities (NERC) Act (2006). Consent should not be granted for development which results in the uncompensated loss of such habitats.

Although no skylarks were recorded nesting on the site at the time of the ecological survey, this was carried out late in the season for this species. Dependent on the crop rotation, the application site is likely to provide suitable nesting habitat for skylark in some years. Loss of this site to development would therefore remove this nesting resource from that available in the area. Skylark are a UK and Suffolk Priority species and are on the 'Red' list of Birds of Conservation Concern (BoCC) due to population declines. Compensation for the loss of suitable nesting habitat for this species must therefore be sought as part of this proposal. We would recommend that this is in the form of skylark plots (meeting the specification set out in Countryside Stewardship option AB4) on nearby arable land, these should be secured for a minimum of 10 years.

Although no evidence of badger was found on the application site during the ecological survey, they are known to be present in the immediate vicinity of the site (further information available from Suffolk Biodiversity Information Service (SBIS)) and their presence on site cannot be ruled out in the future. Badgers can rapidly colonise new areas and therefore a further walkover survey to confirm their absence should be undertaken immediately prior to any works commencing. If any evidence is found at any time, further advice should be sought from a suitably qualified ecologist.

A company limited by
guarantee no 695346
Registered charity no 262777

We note the consultant has recommended a sympathetic lighting scheme during construction. It is important that all retained and new habitat features are not impacted on by light spill from external lighting and that dark corridors are retained around the site for foraging and commuting bats. We recommend that Suffolk County Council's street lighting strategy is used as a basis for long term street lighting layout and design, alongside the recommendations made in the ecological survey report.

We note areas have been designated as green space with the provision of Sustainable Urban Drainage Systems, woodland and open green corridors. We query how these areas will be managed to maximise their biodiversity value in the long term?

Notwithstanding the above, should development at this site be considered acceptable, we request that the recommendations made within the report are implemented in full, via a condition of planning consent. We also request that any development secures appropriate ecological enhancements as part of its design. This could include (but not be limited to) integrated nesting opportunities for birds such as swifts and house sparrows; integrated roosting opportunities for bats and hedgehog friendly garden boundaries.

As this is an outline planning application, should consent be granted it must be ensured that any future reserved matters applications are informed by suitably up to date ecological information.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

Jill Crighton
Conservation Planner

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



21 February 2017

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

By email only

Dear Dylan

Application: 5070/16

Location: Land at Norton Road, Thurston

Proposal: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together

Thank you for consulting Place Services on the above application.

Holding objection: There is insufficient ecological information available to understand the residual impacts of development on Priority species, particularly skylarks. This is due to a lack of survey data so only an opinion is provided.

Indeed the Preliminary Ecological Appraisal report (Base Ecology, Sept 2016) states that:

"Due to the arable character of the site, there is potential for habitat of farmland birds such as skylark to be lost through the proposed development. However, the impact of such is considered to be minor in context of the development footprint...."

As it is possible that skylark territories may be lost, and no mitigation has been offered eg offsite nest plots on nearby arable land, a clarification of the likelihood of impact is required. The PEA also states that: *"The northern half of the site is surrounded by tall hedgerows and woodland which is less favourable for nesting purposes due to the risk of predation, (there is) the disturbance associated with regular dog walkers, and (there is) the widespread availability of arable farmscape in the local area."*

All likely impacts on Priority species need to be considered (not just significant ones) so there is therefore a gap in information which needs to be filled before determination of this application.

This additional information is necessary to confirm the likely impacts on skylarks, and that any necessary mitigation measures have been secured eg 2 nest plots per pair of skylarks displaced or disturbed.

I look forward to working with the LPA and the applicant to provide the missing information to remove my holding objection. Please contact me with any queries.



Best wishes

Sue Hooton CEnv MCIEM BSc (Hons)
Principal Ecological Consultant
Place Services at Essex County Council
sue.hooton@essex.gov.uk
07809 314447

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.

Midlands & East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF
Email address: kerryharding@nhs.net
Telephone Number – 0113 824 9111

Your Ref: 16/5070
Our Ref: NHSE/MIDS/16/5070/KH

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

14 February 2017

Dear Sirs,

**Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access).
Land at Norton Road, Thurston.**

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' 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 up to 200 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 are no GP practices within a 2km radius of the proposed development, there are 2 GP practices closest to the proposed development and these are both within circa 6km. These practices do 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.

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5. The primary healthcare services 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 closest to the proposed development.

| Premises | Weighted List Size ¹ | NIA (m ²) ² | Capacity ³ | Spare Capacity (NIA m ²) ⁴ |
|-----------------------|---------------------------------|------------------------------------|-----------------------|---|
| Mount Farm Surgery | 12,244 | 768.40 | 11,206 | -71.19 |
| Woolpit Health Centre | 14,134 | 645.87 | 9,419 | -323.32 |
| Total | 26,378 | 1,414.27 | 20,625 | -394.51 |

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 120m² 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 by way of extension, refurbishment or reconfiguration at Mount Farm Surgery, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.
7. Although, due to the unknown quantiles 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 extend 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.

High quality care for all, now and for future generations

Yours faithfully



Kerry Harding
Estates Advisor

High quality care for all, now and for future generations



Historic England

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

Direct Dial: 01223 582721

Our ref: P00555391

17 February 2017

Dear Mr Jones

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015**

LAND AT NORTON ROAD, THURSTON

Application No 5070/16 – Erection of Up To 200 Homes

Thank you for your letter of 14th February 2017 notifying Historic England of the above application.

Summary

This application proposes a large residential development on open land at the northern edge of Thurston village. This land is west of the grade II* listed Manor Farm House and could affect its setting. The Council should consider the development's potential to harm the significance of the listed building when assessing the application.

Historic England Advice

Manor Farm House is a grade II* listed building constructed in 1876 to designs by renowned architect Phillip Webb. Webb was a major figure in late Victorian architecture producing notable work in the Arts and Crafts style and, as here, in the Queen Anne Revival style. This architectural movements developed in the 1870s and looked back to English architectural traditions (in particular domestic forms from the early years of the 18th century) to create an modest, elegant, dignified and somewhat playful new language in contrast to the earnest and powerful forms of Gothic and classical which had dominated the 19th century to that point.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Chiefly a domestic form (though also used in institutional buildings such as Newnham College Cambridge and King Edward VII Grammar School, King's Lynn) the Queen Anne was often found in urban developments but its use of traditional forms and concern with quality detailing akin to the Arts and Crafts also made it suited to rural settings. In this case the house is associated with functional farm buildings (timber framed barns around a covered yard) and was placed in a working agricultural landscape, not in a suburban villa context.

Since the construction of Manor Farm House Thurston village has grown on its northern side toward the listed building, but there is still considerable undeveloped farmland around it. This is important in maintaining the original character of its setting and relationship with an agricultural landscape. The proposed development would occupy part of this land the open quality of which contributes to the setting of the listed building so the new housing could bring further modern building (up to 65 houses) closer to the listed building. The existing woodland and creation of allotments and playfields on the eastern side of the site could form some degree of 'buffer' area and we would encourage this aspect of the scheme, but the development of housing could erode the rural character of its surroundings and harm its historic significance.

The National Planning Policy Framework (NPPF) identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings can be harmed by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favorably.

We are of the view that the proposed development could result in harm to the significance of Manor Farm House in terms of the NPPF paragraph 132. We would therefore recommend the Council assess this impact and weigh any public benefit delivered by developments against such harm. The proposed housing might deliver such a benefit and the Council should consider this when seeking the 'clear and convincing' justification for the harm required by the NPPF. We would also suggest the potential for increasing landscaping buffer on the eastern side of the site is explored.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 6, 7, 14, 17, 132 and 134 of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

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Yours sincerely



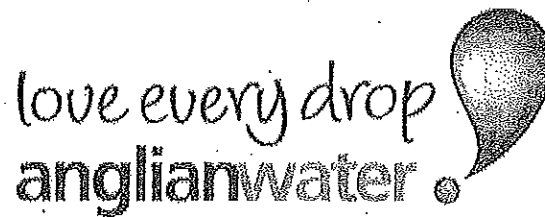
David Eve
Inspector of Historic Buildings and Areas
e-mail: david.eve@historicengland.org.uk



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

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Correspondence or information which you send us may therefore become publicly available.





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

AW Reference: 00019753
Local Planning Authority: Mid Suffolk District
Site: Land at Norton Road, Thurston
Proposal: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)
Planning Application: 5070/16

Prepared by: Sandra Olim

Date: 27 February 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 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

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 surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would 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

Your ref: 5070/16
Our ref: Thurston – land north of Norton Road
00048539
Date: 05 March 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Dylan,

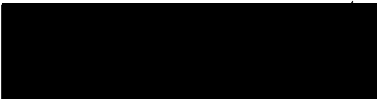
Thurston: land north of Norton Road

I refer to the outline planning permission sought for the erection of up to 200 homes (including 9 self-build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access).

The County Council responded by way of letter dated 20 February 2017 which is still relevant. However this letter provides an update on two issues, namely:

1. Temporary classroom. Whilst these mitigation requirements may still arise in this respect, the District Council's published 123 List contains 'provision of primary school places at existing schools'. So whilst the cost of the temporary classroom will therefore fall to CIL the District will need to report this to committee as a direct cost consequence arising if planning permission is granted and the scheme is built out. On this basis SCC will make a future CIL funding bid to Mid Suffolk District Council.
2. Suggested planning condition restricting dwelling occupations linked with surplus places available at the catchment village primary school. This is a matter for the District to take a view on when considering the application of the 6 tests set out in the National Planning Policy Framework.

Yours sincerely,



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

From: RM Floods Planning
Sent: 13 March 2017 08:31
To: Planning Admin
Cc: Dylan Jones
Subject: 2017-03-13 JS reply Land at Norton Road Thurston Ref 5070/16

Suffolk County Council, Flood and Water Management can recommend approval subject to the following conditions

Outline Application

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
 - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
 - f. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
 - g. Details of who will maintain each element of the surface water system for the life.

The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

2. Concurrent with the first reserved matters application(s) details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

3. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been

submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register

4. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- The Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be is subject to payment of a surface water developer contribution

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864



Consultation Response Pro forma

| | | | |
|----------|---|---|-----------------------------|
| 1 | Application Number | 5070/16 Norton Road, Thurston | |
| 2 | Date of Response | 14.3.17 | |
| 3 | Responding Officer | Name: | Paul Harrison |
| | | Job Title: | Heritage and Design Officer |
| | | Responding on behalf of... | Heritage |
| 4 | Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because it would erode the spacious rural setting of nearby listed buildings. 2. The Heritage Team recommends that ways of avoiding or minimising this harm be explored, and that the presumption against harm be weighed against any public benefits of the scheme. | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | <p>Statutory duty Recent court rulings have confirmed that the statutory duties in the Planning (Listed Buildings and Conservation Areas) Act 1990 have the effect of a strong presumption against harm to listed buildings and their setting. Any harm is to be given great weight in decision-making. Similarly the National Planning Policy Framework expects great weight to be afforded to the conservation of listed buildings and their setting, or greater weight where assets of higher significance are affected.</p> <p>The following assessment applies the method set out in Historic England's advice note GPA3 <i>The Setting of Heritage Assets</i>.</p> <p>Heritage assets The site is a large area of agricultural land and woodland at the edge of the existing settlement. To the east of the site stand Manor Farm, listed Grade II*, and its associated barn complex listed Grade II and now converted. Other heritage assets are at such a distance that the proposed development would have no material impact.</p> <p>The setting and significance of assets The significance of Manor Farm relies mainly on its being designed by Philip Webb, one of the most influential British architects and designers of the late 1800s. Webb was also architect for contemporary alterations and</p> | |

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.

| | |
|--|---|
| | <p>additions to Nether Hall. Unusually, the Farmhouse is designed in the 'Queen Anne' style, echoing urban brick buildings of about 1700, which contrasted with the more ostentatious gothic revival style of the mid-1800s. It is therefore in the vanguard of architectural design in the 1870s.</p> <p>The barn complex is an example of a Victorian 'model farm' with the added interest of being designed by Webb, although architecturally the buildings are not unusual as Victorian farm buildings.</p> <p>The spacious rural setting of Manor Farm and its former farm buildings makes a positive contribution to their significance. However, Manor Farmhouse does not seem to succeed an earlier building, but is associated historically with Nether Hall to the north. As a later building, its agricultural surroundings make a less important contribution to its significance than would be the case for a traditional farmhouse.</p> <p>Since conversion of the barn complex, the introduction of residential development and activity in the curtilage of the barn dwellings has eroded the agricultural character of the land between them and the application site. Similarly development associated with the keeping of horses has changed the character of land belonging to Manor Farm.</p> <p>The listed buildings stand at a somewhat lower level than the application site, giving a degree of separation from the application site.</p> <p>Impact of the proposal The change from farmland to residential and school use would represent a degree of harm in the spacious rural setting of the listed buildings, but because of the factors referred to above the level of harm resulting to the significance of the listed buildings is considered to be low.</p> <p>In accordance with NPPF paragraphs 129, 132 and 134, you should consider whether this harm can be avoided or minimised, and whether it is justified in terms of public benefits.</p> |
| <p>6 Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are</p> | <p>Mitigation of harm It seems clear that much of the site is capable of development with relatively little potential impact on the setting of the listed buildings. However in the illustrative layout accompanying the application development is shown reaching the eastern boundary of the site, where it is most likely to affect the setting of the listed buildings. The layout also shows significant areas of open space and new woodland planting. It would be worth exploring</p> |

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.

| | | |
|---|-------------------------------|--|
| | proportionate | whether the layout can be arranged so as to allow for a green buffer along the site's eastern boundary which would serve to sustain a more rural character in the setting of the listed buildings. |
| 7 | Recommended conditions | |

Please note that this form can be submitted electronically on the Council's 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 Council's website and available to view by the public.

From: Thurston Parish Council [mailto:info@thurstonparishcouncil.gov.uk]
Sent: 17 March 2017 10:10
To: Planning Admin; Phillip Isbell; Trevor Saunders
Subject: FW: Saved search results and Tracked Applications have been updated

For the attention of: Dylan Jones

Dear Dylan,

As the case officer tasked with dealing with the Planning Applications listed below may I please confirm that the responses from both Thurston Parish Council and Thurston Neighbourhood Plan Team should be read as one overall response and should form part of the Parish Council's Statutory Consultee response.

Ref: 4386/16 Erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space - Land on the west side of Barton Road, Thurston IP31 3NT

Ref: 4963/16 Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road. - Land west of Ixworth Road, Thurston IP31 3PB

Ref: 5070/16 Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access) - Land at Norton Road, Thurston

Ref 4942/16 Residential development consisting of 64 dwellings and associated highway, car parking and public open space - Land at Meadow Lane, Thurston IP31 3QG

Ref 5010/16 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16 - Land to the south of Norton Road, Thurston IP31 3QH

Should you have any queries on this matter perhaps you would be kind enough to contact me.

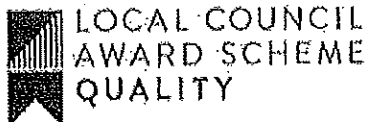
Kind regards

Vicky

Mrs V Waples
Clerk & Proper Officer to Thurston Parish Council
Parish Council Office
New Green Centre
New Green Avenue
Thurston
IP31 3TG

Tel: 01359 232854

Website: Thurston.suffolk.cloud



Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk
@PlaceServices



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

21/03/2017

For the attention of: Dylan Jones

Ref: 5070/16; Land at Norton Road, Thurston

Thank you for consulting us on the outline planning application for the erection of up to 200 homes (including 9 self-build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

This letter sets out our consultation response focusing 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 proposal will significantly change the character of the site, from agricultural land to residential. However, the existing landscape envelope within and around the site, (combined with the proposed landscape mitigations included as part of the application) provide an adequate strategy to suitably reduce the visual impact of the development.

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

- 1) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years to support plant establishment.
- 2) Sustainable urban drainage system (SuDS) features such as detention basin and others with landscaping elements should also to be included on the landscape management plan and ensure that adoption is in place prior construction. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics,
- 3) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment. SuDS features such as detention basin and others with landscaping elements are also to be included on the landscape management plan and ensure that adoption is in place prior construction.
- 4) If the application is approved, an appropriate detailed boundary treatment plan and specification will need to be submitted.



Our Ref: 570/CON/5070/16
Date: 3rd April 2017
Enquiries to: Steve Merry
Tél: 01473 341497
Email: steven.merry@suffolk.gov.uk

NAME Mr Anthony Palmer
ADDRESS Pigeon Capital Management 2 Ltd
Salisbury House,
Station Road,
Cambridge,
United Kingdom,
CB1 2LA

Dear Mr Palmer

Interim Reply to Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except or access) for Land at Norton Road, Thurston

This letter is complimentary to that ref 570/CON/5070/16 dated 10th March 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. This letter details the additional issues that the Highways Authority has identified are specific to this application.

Site Access from the public highway

Drawing 618212/Sk11 shows the green line for highway works at the rear of the kerb line. This does not allow for construction and maintenance of a culvert across the ditch nor installation of utility apparatus.

The alternative access shown on drawing 016-032-007 could be acceptable if agreement is obtained from the developer to the south of Norton Road to modify the layout of their site and that detailed design drawings including visibility and pedestrian / cycle facilities are provided.

Visibility splays for the junction with public highway are stated as 2.4m x 120m in the Transport Assessment which is acceptable based on the speed data provided (85thile EB 40.9mph / WB 43mph). However, it is noted by retaining the hedge along the north side of the road the area retains a rural character and compliance with the signed 30mph speed limit is poor, as is reflected by the speed data. It is also noted that the speed data taken from Norton Road adjacent to site, not at the edge of the splay.

Internal Highway layout

Although all matters are reserved except for access, we would nevertheless make the following comments on the indicative internal highway layout with a view to assisting with reserved matters.

The main access road is scaled at 5.5m but this will need to be confirmed as part of this application and swept path analysis provided to show access is possible for likely vehicular use.

Within the site visibility has been design for a 20mph speed limit. This may be accepted for shared space carriageways but it would not be acceptable for local distributor roads. Therefore, a MfS design for visibility for 30mph should be used (i.e. access x-distance 2.4m and stopping sight / y-distance of minimum 43m).

Access for plot no's 22 to 30 is off Meadow Lane and the driveways shown on 016-032-001 do not connect with the carriageway and cross the ditch east of Meadow Lane. Meadow Lane is also narrow. Further details of the access layout will be required to satisfy us that this is practical as part of this application.

Car parking

To be dealt with at reserved matters stage but complies with SCC guidance.

Footway and cycle connectivity

The proposed internal footway along the site boundary with Norton Road only runs to the eastern site access and there is no connection to Norton Road at this point. A footway connection should be made with Norton Road as far to the east as practical (near plot 40) to provide an alternative route for pedestrians.

It is desirable to provide a cycle and pedestrian connection across Norton Road to the proposed development to the south if the alternative access shown on drawing 016-032-007 is not provided.

Public Rights of Way (PRoW)

No PRoW are within the site limits. However, two (Thurston 001 and 007) connect with the north end of Meadow Lane to the NW of this site. Connectivity with these footpaths does not appear to have been included in the masterplan. Thurston 001 forms a significant link between the site and Ixworth Road, Thurston Community College, and probable future developments on Ixworth Road. Therefore, S106 funding for improvements to this footway will be requested.

Landscaping

Drawing 618212/Sk11 shows a tree lined avenue proposed as part of the detailed planning application. This layout will not be accepted within the public highway unless a) the soils are not susceptible to shrinkage b) details are submitted showing that utilities are located away from and protected from damage due to tree roots and c) details of protection of the highway infrastructure are submitted. The positioning of the trees is likely to compromise street lighting.

Road Safety

The data available indicates that the single significant location with a high frequency of crashes is at the junction of C693 Thurston Road / C692 Thurston Road / C693 New Road and not Thredwastre Road / New Road as stated. It is proposed that mitigation measures are undertaken at the Thurston Road / New Road junction.

Public Transport

The nearest bus stop is approximately 500m from the site. If practical it is proposed that additional bus stops and shelters are placed either side of Norton Road to the east of Rylands Close.

Trip Generation

The Trip rates and modal splits are considered acceptable.

Junction Assessment

It is noted that four junctions were modelled

- Junction 1: Norton Road / Church Hill / Pakenham Road
- Junction 2: Norton Road / meadow Lane / Sandpit Lane
- Junction 3: Station Hill / Barton Road
- Junction 4: Beyton Road / Thurston Road / Thedwastre Road

The A143 / Barton Road was not included, although 15% of the vehicles are expected to use this route. Modelling from other developments indicates that this junction is operating at or close to capacity in the peak periods and any additional traffic may have a severe impact. This matter is addressed in the letter regarding the cumulative impact of the five developments.

The flow diagrams used for modelling of the AM peak the Norton Road East approach to the Pakenham Road junction seems to not agree with the traffic survey. It is also thought that there may be some confusion over the approaches to the Thurston Road / Thedwastre Road crossroads, when compared to the survey. These should be reviewed.

Proposed Highways S106 Heads of Terms

- Improvements to PRoW Thurston 001 between Meadow Lane and Ixworth Road
- Improve PROW 007 (un metalled) north of Meadow Lane
- Contribution towards extension of speed limit on Norton Road
- Contribution towards bus stops and shelters either side of Norton Road to the east of Rylands Close
- Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction
- Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton
- Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road
- Contribution towards 40mph speed limit on the C692 Thurston Road as part of the above safety improvement

Proposed S278 works

- Uncontrolled footway / cycleway crossing on Meadow Lane
- Footway on north side from Meadow Lane east towards Church Lane (if one is not included in S38 agreement).
- Crossing between Hopkins site and Pigeon site (un-controlled)

The S278 and 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.

Yours sincerely



Steve Merry
Transport Policy and Development Manger
Resource Management

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
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@PlaceServices



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

21/03/2017

For the attention of: Dylan Jones

Ref: 5070/16; Land at Norton Road, Thurston

Thank you for consulting us on the outline planning application for the erection of up to 200 homes (including 9 self-build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

This letter sets out our consultation response focusing 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 proposal will significantly change the character of the site, from agricultural land to residential. However, the existing landscape envelope within and around the site, (combined with the proposed landscape mitigations included as part of the application) provide an adequate strategy to suitably reduce the visual impact of the development.

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

- 1) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years to support plant establishment.
- 2) Sustainable urban drainage system (SuDS) features such as detention basin and others with landscaping elements should also to be included on the landscape management plan and ensure that adoption is in place prior construction. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics,
- 3) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment. SuDS features such as detention basin and others with landscaping elements are also to be included on the landscape management plan and ensure that adoption is in place prior construction.
- 4) If the application is approved, an appropriate detailed boundary treatment plan and specification will need to be submitted.

Place Services is a traded service of Essex County Council



Review on the submitted information

The submitted planning application includes a Landscape and Visual Impact Assessment, Design and Access Statement, Illustrative Masterplan and a Landscape Statement.

The submitted Landscape and Visual Impact Assessment (LVIA) is a thorough report which concisely assesses the impacts and effects and proposes appropriate mitigation measures. The LVIA report includes a detailed analysis of the site, the surrounding landscape and how the proposals seek to mitigate the impact of the development over the short, medium and long term. The LVIA report carries out an analysis of 13 viewpoints which informs the mitigation recommendations to be implemented as part of the development layout.

Proposed mitigation

The Landscape Statement provides a clear methodology for the landscape strategy which includes plant species, landscape character, public open space provision and public realm, surface materials. The Landscape Statement proposes a clearly considered green infrastructure which adequately mitigates the impact of the development. The indicative layout includes a good range of public realm and public open spaces with high amenity value.

Views to the development identified on the LVIA have been adequately mitigated through planting along edge boundaries and within the residential development helping to screen and filter those critical views.

As part of sustainable drainage and in addition to the proposed balancing ponds, there are further opportunities for open swales, rain gardens or similar attenuation techniques across the site and along main route through the development.

Yours sincerely,

Almudena Quiralte BA (hons) DipLA, ALI
Landscape Architect Consultant
Telephone: 03330136858
Email: almudena.quiralte@essex.gov.uk

Place Services provide landscape 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.



Sent: 25 April 2017, 16:26

To: Dylan Jones

Subject: RE: Planning applications for 872 houses in Thurston

Dear Dylan, thank you for your enquiry. Of the 6 applications we only responded to 5070/16, the remaining applications had no environmental constraints in our remit.

Flood risk

None of the sites are in areas at risk of fluvial flooding. The assessment of risk of flooding from surface water is a matter for the lead local flood authority; Suffolk County Council.

Foul water disposal

According to our records there should be sufficient headroom within the Thurston Water Recycling Centre permitted Dry Water Flow to accommodate all 827 dwellings. It is important, however, that you consult Anglian Water as they are the only ones that can confirm whether the local foul sewers have sufficient hydraulic capacity.

The developers of each individual site should already have approached AWS with a Pre-development Enquiry. However, depending on the timing of those enquiries they may not have considered the cumulative impacts.

Water supply

Thurston lies in an area of water stress. Our standard water resources comments for this situation are below:

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

The development lies within the area traditionally supplied by Anglian Water Services Ltd. It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. You should seek advice from the water company to find out if this is the case, or a new source needs to be developed or a new abstraction licence is sought. We may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.

THE LOCATION OF DEVELOPMENT SHOULD TAKE INTO CONSIDERATION THE RELATIVE AVAILABILITY OF EXISTING DEVELOPED WATER RESOURCES

The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.

EVERY OPPORTUNITY SHOULD BE TAKEN TO BUILD WATER EFFICIENCY INTO NEW DEVELOPMENTS, AND INNOVATIVE APPROACHES SHOULD BE ENCOURAGED.

We support all initiatives aimed at reducing water use. The extent of water efficiency measures adopted will affect the demand for water for the development and we would expect that this will be taken into consideration. It is assumed that new houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. We support greywater recycling as it has the potential to reduce water consumption in the average household by up to 35% if achieved in a safe and hygienic manner.

It is the responsibility of the applicant to ensure that no local water features (including streams, ponds, lakes, ditches or drains) are detrimentally affected, this includes both licensed and unlicensed abstractions.

If the proposal requires an abstraction licence, it is recommended that the applicant contact our permitting centre. Depending on water resources availability a licence may not be able to be granted.

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

External 02 03 02 58389

Mobile 07845 875238

graham.steel@environment-agency.gov.uk

<https://www.gov.uk/government/organisations/environment-agency>

<https://www.gov.uk/flood-risk-assessment-for-planning-applications>

<https://www.gov.uk/flood-risk-assessment-local-planning-authorities>

Iceni House, Cobham Road, Ipswich, IP3 9JD

From: Khan Wasil [mailto:Wasil.Khan@networkrail.co.uk] **On Behalf Of** Town Planning SE
Sent: 03 May 2017 11:56
To: Planning Admin
Cc: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / (anglia)

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application 5070/16 and offering us the opportunity to comment.

We have reviewed the application above and assessed the further combined developments which include the below planning applications.

- 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH – 175 dwellings
- 4963/16 / Land west of Ixworth Road, Thurston IP31 3PB – 250 dwellings
- 4942/16 / Land at Meadow Lane, Thurston IP31 3QG – 64 dwellings
- 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT – 138 dwellings
- 5070/16 - Land at Norton Road, Thurston – 200 dwellings

We note the five submitted developments have a total residential occupancy of approximately 827 units.

It should be noted that Network Rail's strategy is to close level crossings wherever possible as this removes any interface where a person or vehicle could be struck by a train. Therefore the major concern for Network Rail in relation to these proposals, is the Barrow level Crossing at Thurston Station. Historically we have seen a number of issues at this crossing and cannot accept additional impact and further usage unless mitigation and measures are introduced; therefore the preferred option in this location would be to close the level crossing.



The safety justification for closure of the crossing is set out below:

Thurston station level crossing is a footpath crossing with miniature warning lights located at the end of the platforms at Thurston. The crossing traverses two lines and is 8.9m in length, equating to a user requirement of 11.35 seconds to traverse the crossing, with a required sighting distance of 381m, of which there is currently insufficient sighting but this is mitigated by the miniature warning lights.

Trains run frequently over the crossing with approximately 124 trains running at up to 75mph for 24 hours per day with stopping and non-stopping trains.

Particular factors have to be considered for the safety of those using the crossing. Network Rail has a standard Risk Assessment tool called ALCRM (All Level Crossing Risk Model), which determines the predictive level of risk at a level crossing based on a variety of factors, including misuse, train information, number of users, the environment, available sighting etc. Based on the information entered, ALCRM calculates the risk score which generates an individual risk to a user (A to M) and a collective risk (1 to 13) with A and 1 being the highest calculated risk.

Within these risk bands, ALCRM also calculates a Fatality & Weighted Injuries (FWI) score. When the last ALCRM assessment was undertaken in July 2015, Thurston level crossing's risk score was calculated as 0.001924552 (D4), which is outside of ALCRM's high risk categories.

The proposed residential development will see the usage at this crossing increase to a greater level and therefore mitigation options to decrease the risk will need to be explored in order for Network Rail to support the planning application.

Without definitive numbers, the increase in pedestrian footfall has been modelled in ALCRM as follows:

- 75 Pedestrians per day: D4 with a FWI of 0.001924552 (Last census)
- 120 Pedestrians per day: D4 with a FWI of 0.003079283
- 150 Pedestrians per day: D4 with a FWI of 0.003849104
- 200 Pedestrians per day: D3 with a FWI of 0.005132138

As you can see the FWI rises, with 200 pedestrians a day this would move the crossing into a High risk category. Currently a new risk assessment is being carried out and from a safety perspective if the development were to be approved then the level crossing will see a significant increase in pedestrian usage (currently 75 users per day). In all of the aforementioned pedestrian scenarios, there would be a marked increase in the risk profile at this level crossing which would therefore be unacceptable.

Given the increase in risk and increased usage at the station, we believe the development will have a severe effect on safety unless mitigation measures are introduced and contributions are provided in order to fund the closure of the crossing. The measures required to close the crossing are outlined in the attached feasibility report. In light of the 5 applications coming forward, we believe the only fair and reasonable solution would be for the applicants to share the cost of the crossing closure. The cost of the closure is estimated to be £1 million, which equates to £1209.19 per dwelling.

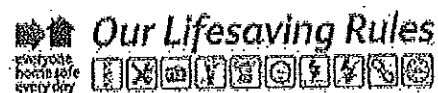
Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied by the amount of dwellings which are permitted, to enable the closure of the level crossing.

Reason: To ensure safe and suitable access can be provided in accordance with Paragraph 32 of the NPPF.

Kind Regards,

Wasil Khan
Town Planning Technician, Property

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From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]
Sent: 06 April 2017 15:10
To: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Land at Norton Road, Thurston

Proposal: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us within 14 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are GP1, NPPF, SC4, Cor4, RT12, CL8, C01/03, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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Level Crossing Development Team (LCDT) Feasibility Report Thurston Station Level Crossing



| | |
|--------------------------------|--|
| Project Name: | Anglia Closure Feasibility Studies – Package 5 |
| Business Plan or OP Reference: | 144179 |
| Client: | Mark Brunnen |
| Sponsor: | Sean Cronin |

| | |
|---|---|
| Prepared By: (Development) | Name: Hugo Nobrega |
| | Job Title: Project Development Assistant |
| | Date: 06/08/2015 |
| Prepared By: (Engineering) | Name: Vanessa Kettlestring |
| | Job Title: Senior Civil Engineer |
| | Date: 04.08.2015 |
| Checked and Approved By: (Development) | Name: George Onaya |
| | Job Title: Senior Project Development Manager |
| | Date: 04.08.2015 |

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ISSUE RECORD

| Revision No | Prepared by | Issue date | Comments |
|-------------|-------------|------------|---------------------------------------|
| 0.1 | RJ | 12/06/2015 | Working draft |
| 0.2 | AK | 15/06/2015 | Peer Review |
| 0.3 | HN | 06/07/2015 | Peer Review/ Working Draft |
| 0.4 | CH2M | 21/07/2015 | Added civil engineering sections/text |
| 1 | HN | 04/08/2015 | First Issue for feasibility workshop |
| 2 | HN | 25/8/2015 | Final Issue |

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1. Project Scope & Requirements

The Feasibility Report is a 'Governance for Railway Investment Projects' (GRIP) stage 2 deliverable and its purpose is to document all feasible options and make an initial Single Option recommendation for consultation with key stakeholders.

The scope of this report is to demonstrate that feasible closure options for Thurston Station Level Crossing have been explored during GRIP Stage 1 to 2.

It should be noted that Network Rail's strategy is to close level crossings wherever possible as this removes any interface where a person or vehicle could be struck by a train. All feasible closure options shall be considered throughout the report.

This report relates to Thurston Station Level Crossing which is within the scope of 'Anglia Closure Feasibility Studies - Package 5'.

The 'Anglia Closure Feasibility Studies - Package 5' Project also contains the following Level Crossings; Bloss, Ellingers, Maltings, Melton Sewage, Jetty Avenue, Kingston Farm, Dock Lane and Melton Station. These level crossings are all on the Coldham Lane to Haughley line.

The level crossing is currently a Station Platform Crossing (SPC) protected by Miniature Stop Lights (MSL) and spoken audible warnings. The level crossing is located on Engineers Line Reference (ELR) CCH, 32m 54ch and supervised by Colchester Signal Box. Thurston Station level crossing Fatalities and Weighted Injuries (FWI) score is 0.001790697 and All Level Crossing Risk Model (ALCRM) score is D4.

The level crossing is located at the Elmswell end of Thurston Station (managed by Abellio Greater Anglia). The level crossing provides access from the down side and acts as the only means of accessing the up platform.

The station building has been closed for some years. This is believed to have originally provided access to up platform (platform 1) via a subway. When the station building was closed, access to the up platform was provided by the provision of the level crossing. The down platform (platform 2) is accessed directly from the station car park and has no level crossing requirement. Fig1- Thurston Station location map:



Thurston is a medium sized village east of Bury St Edmunds in the county of Suffolk. Around the station there is a mix of old and new residential properties and a number of medium sized businesses.

The main usage over the level crossing today is pedestrian traffic; the level crossing provides the only access to platform 1 (up side).

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2. Diversity Impact Assessments

From September 2014, reclassification means that Network Rail needs to respond positively to the Public Sector Equality Duty. This part of the Equality Act 2010 requires public bodies and organisations that carry out public functions to consider people with protected characteristics when doing so.

Diversity Impact Assessments (DIAs) are the method Network Rail have chosen to demonstrate due regard to duties pursuant to the Equality Act 2010. A DIA is a tool that helps to make sure that Network Rail policies, projects and design, build and operate services works well for people with protected characteristics.

A DIA assesses the likely effects of our work on people who share the protected characteristics of age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. The duty to have due regard to the need to eliminate discrimination also covers marriage and civil partnerships. Once any potential negative impacts have been identified, the DIA can be used to plan ways to remove or mitigate these, wherever possible.

The LCDT have taken the following steps to identify any negative impacts to users at the crossing:

1. Desktop assessment identifying local infrastructure that may create usage trends at the crossing (Hospital, Place of Worship etc).
2. Site visit to access local environment.
3. 9 day census.
4. Consultations with local Network Rail stakeholders including teams from maintenance, risk and operations.

The closure of Thurston Station level crossing could impact on journey times, and effort required for those currently using the crossing. This option could potentially also impact on people with the following protected characteristics:

- Disability
- Age
- Pregnancy/maternity

The proposed option will add additional journey time and effort which could particularly impact on disabled people. The new route could lead to additional time and effort for disabled people and additional signage could confuse and distress those with learning disabilities in the short term. The longer detour will also impact on persons whose mobility is reduced because of their age; they will have to navigate a longer detour by using the ramp. Steep gradients on the ramp could present a real challenge to those who are heavily pregnant, pushing a pram or walking with small children.

The proposed closure option will have an overall positive impact on the protected characteristics mentioned above. This is because the provision of grade separation with the railway eliminates the risk posed by train strikes to this group which is vulnerable as a result of reduced mobility, hearing, vision or distractions.

In closing the level crossing we would want to continue to provide appropriate access to the station platforms and amenities.

3 Options Report & Concept Designs

The closure options assessed for Thurston Station Level Crossing were:

- Closure and diversion via existing routes
- Closure and construction of footbridge
- Closure and construction of underpass
- Closure and construction of underpass and pedestrian ramp

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- Closure and construction of pedestrian ramp, layby and change to public road /footpath layout
- Reinstate subway in situ

3.1 Non-Feasible Options

The following options were reviewed and assessed as not feasible.

3.1.1 Closure and diversion via existing routes

No other access route is available

3.1.2 Closure and construction of footbridge

A footbridge would require ramps for access by users with pushchairs, wheeled luggage as well as mobility impaired users in accordance with the Equality Act.

This option is not feasible due to lack of space for the ramps, particularly on the Down side where land is used for car parks, businesses and residential properties. The footbridge would overlook properties and would require more than one set of ramps than option 3.2.1.

3.1.3 Closure and construction of underpass

This option was discounted due to the railway and platforms built on an embankment. An underpass on its own would leave no access to platform 1 on the Up side from ground level.

3.1.4 Closure and construction of underpass and pedestrian ramp

Pedestrian subways passing under the railway should comply with the applicable requirements for an underline bridge with stairs and ramps being in accordance with the requirements detailed for footbridges.

Based on site layout there were two locations considered for siting a subway: in the same position as the level crossing, and at the other end of the station between the station building and the bridge. The topography at the level crossing comprises a steep slope on the Up side of the line and a near level/gently sloping on the Down side. A subway here would require ramps leading down into the subway from the Down side. These ramps and side walls would take up a large part of the existing station car park and private land. Ramps would be required on the south side of the subway to enable passengers to access Platform 1 which would be at a higher level to the subway. Due to the impact on the station car park and adjacent properties this option has been discounted.

To locate a new subway nearer the underbridge would have the benefit of the line being on steep embankments but the dis-benefit of requiring ramps up to both platforms. Due to space restrictions for the ramps and significant construction works to build the subway with minimal impact on the lines and the existing platform foundations this option has been discounted.

3.1.5 Reinstate subway in situ

Historically, a subway ran from inside the mezzanine floor of the station building on the Down side, under the railway and exited onto Beyton Road with steps leading up to Platform 1 (Up side). The station has been closed for some time and the subway has filled in.

3.2 Feasible Options

The following options were reviewed and assessed as feasible.

3.2.1 Closure and construction of a pedestrian ramp, layby and changes to the public road and footpath layout

Closure is possible with the construction of a ramp, from Platform 1 (Upside) down the embankment leading onto Beyton Road. The design is to include a drop off point / layby for vehicles.

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The current arrangement consists of the main car park and medium sized businesses (Down side). Pedestrians currently use the footpath crossing to change from Platform 2 (Down side) to Platform 1 (Up side) as this is the only access.

With this proposed option, the diversion route is approximately 4-5 minutes via Beyton Road and Station Hill, passing under a rail bridge. The rail bridge currently has a very narrow footpath. In order to provide a suitable diversion the footway would need to be widened. Due to physical restriction of the walls of the bridge it is impossible to do this without decreasing the width of the vehicle carriageway.

To continue to accommodate vehicles passing under the rail bridge, if the vehicle carriageway width was decreased, a change of the road layout would be required. It is proposed to:

- Introduce single lane traffic through the bridge - controlled by new traffic light control at both ends. The path of the vehicles would be through the centre of the bridge arch, allowing the footpath to be widened and reduce the number of bridge strikes. This would require horizontal re-alignment of the road to provide a straight, rather than curved approach to the underbridge which would reduce bridge strikes.
- Remove the current mini-roundabout and have a continuation of Beyton Road and Barton Road

This would reduce blocking back and introducing a one way system through the bridge.

This option would require land ownership and agreement by local authority / highways. This option will be subject to a Road Safety Audit (RSA).

4 Compliance with Route Requirements Document

A Route Requirements Document (RRD) has been produced for 144179 Anglia Closure Feasibility Studies - Package 5.

Compliance with the requirements contained within will be via the LCDT internal deliverable management process and stage gate review.

5 Constructability Assessments

The desk study of the ground conditions indicates that the ground beneath any structures would require improving or pile foundations due to the unconsolidated nature of the near surface deposits (Head deposits). Given the location of the proposed passenger access ramps it is suggested that pile foundations be employed.

The passenger access ramp design is based on Network Rail standard details with no modifications. This should enable an efficient manufacture and construction programme.

To minimise the number of possessions required the majority of the construction work should be done from the area south of the railway. Access for construction plant could be gained from Beyton Road. The construction sequence would need to consider the exit strategy for plant as the access is very narrow. The piling rig could work backwards from the eastern extent and finish piling near the existing gateway. Due to the constrained space where the ramps are proposed it would be necessary to position the lifting crane in the car park of the adjacent car service garage. Agreement would be required first from the landowner. If agreement was not reached then the piling operation would need to be from the track under possession or alternative ground improvement works carried out.

The highway works would be carried out using lane and road closures. Sandpit Lane and Norton Road are considered suitable for temporary traffic diversions subject to approval by the local

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highways authority. Works under the bridge would require smaller excavation plant due to the reduced height clearance.

The alignment of Beyton Road on a left hand curve to the junction with New Road results in a wide swathe of verge being required for forward visibility to the primary traffic signal. Ideally this should be 90m for the speed of the road but this would require land from a residential property. The proposed layout only shows land take from the adjacent wooded area and a reduced visibility to 70m (a one-step reduction in standard according to the Design Manual for Roads and Bridges TD9/93). This would need agreement by the local highway authority and be considered as part of a road safety audit.

From the ordnance survey maps and site visit there appears to be sufficient space within the Network Rail boundary for the structure and within the highway and 'open' spaces for the proposed highway layout. The exact extent of Network Rail land on the Up side of the railway needs to be checked by a full topographical survey as this area is constrained by the boundary with Cracknell's garage and the embankment that supports the railway. Agreement will need to be sought with the owners/tenants of Cracknell's garage for plant access as this could affect the proposals and/or the construction strategy.

The results of the topographical survey and early consultation should be used to determine the optimum design for the ramp. The proposals show a skewed steel structure but a solid structure cut into and retaining the railway/embankment could be an alternative option to optimise the space available.

A topographical survey should be carried out to verify the height clearances for high vehicles and the road kerb lines to enable the proposed highway layout to be checked and optimised.

A ground investigation should be carried out to verify the composition and structural properties of the railway embankment and the ground conditions for the piled foundations of the ramps.

Standard non-disruptive possessions are available each Saturday night for approximately 8hrs based on the Engineering Access Statement for 2013. A single possession should be sufficient for the removal of the foot crossing and the construction of the tie-in of the passenger access ramp. Further non-disruptive possessions are available on the Sunday night and mid-week nights if required.

The existing access to Platform 1 would need to be kept open until the new means of access was constructed and fit for use.

6 Geotechnical Hazards

Introduction

Thurston Station is sited on a sequence of undifferentiated chalk deposits from the White Chalk Subgroup from the Cretaceous Period and is overlain by a thin layer of superficial deposits known as Head deposits from the Quaternary Period (BGS, 1982). The Chalk extends like a protruding finger southwards from the main outcrop of Chalk to the north and west. The finger of Chalk is surrounded by Crag Group deposits from the Quaternary and Neogene Periods. Crag Group deposits typically consist of semi consolidated sands and gravels, where as the Head deposits consist of unconsolidated clays, sands and gravels. Made Ground although not identified on the geological map is likely to be present. See Drawing No 144179-THJ-TS-DRG-00021 'Geotechnical Features and Hazards' in Appendix B.

Further descriptions of the geology and on site ground conditions including structural and hydrogeology explanations are given in Appendix C. The geotechnical hazards associated with deposits of Made Ground, Head, Crag and Chalk are discussed below and in the geotechnical risk register, Table 5 in Appendix C. Recommendations for a ground investigation are contained in Appendix C.

Made Ground

There is potential for any made ground associated with the rail network, for example the railway embankment, and previous land use of the site to contain contaminated soils. The soils may also

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contain high levels of sulphate which potentially could be aggressive to buried concrete. Groundwater may be present at shallow depths in any made ground deposit.

Superficial Deposits

The Head deposits are likely to be up to a couple of metres in thickness and could potentially cause problems for excavation. Head deposits are recognised for having extremely low angle shear planes, therefore any design needs to take this into account. Head deposits make particularly poor foundation soils due to their unconsolidated nature. Groundwater may be present at shallow depths, which can cause problems during shallow excavation.

Crag Group

Shallow or deep excavations below the water table in loose sandy gravelly materials will encounter stability problems. Appropriate shoring and dewatering techniques will be required to maintain a stable excavation.

Aquifer protection measures will be required for any ground investigation and construction works undertaken within the Minor Aquifer.

Chalk

The most significant geotechnical hazard associated with the proposed development is the presence of dissolution features in the Chalk bedrock. Ground dissolution occurs when water passing through soluble rocks produces underground cavities and cave systems. These cavities can cause localised collapse of the overlying rocks and superficial deposits, near surface cavities, subsidence and sinkhole formation, uneven rockhead, reduced rock-mass strength, and rapid groundwater flow. In rare cases, subsidence can occur following collapse of soils above cavities. The associated engineering problems include irregular rockhead and weathering profile, localised subsidence, and increased mass compressibility and diminished rock mass quality. Sinkhole formation and subsidence has the potential to cause damage to buildings and infrastructure such as roads, railways, pipes and drains. Manmade cavities such as chalk/flint mines or dene holes (caves) may also be present and be subject to the same geotechnical hazards as natural cavities.

Chalk is particularly susceptible to weathering and frost penetration which affects all chalks within 0.5m of the ground surface (CIRIA, 2002). Frozen chalk becomes very weak and compressible on thawing, leading to heave and differential settlement of supported structures and pavements. It is significant for unsupported cut slopes where frost action leads to a gradual degradation of the slope face.

The Chalk is likely to contain large, tabular flint nodules and hard chalk bands which could cause problems during excavation or during pile driving.

The Chalk is designated as a Principal Aquifer and as such pollution prevention measures and aquifer protection should be implemented to avoid contamination during any ground investigation or construction works.

7 Civil Engineering Considerations

Table 1: Site Information

| Item | Details |
|-----------------------|---|
| Site Name and Address | Thurston Footpath LC, Thurston Station, Station Hill, Thurston, Bury St Edmunds, IP31 3QU. |
| Location | ELR: CCH, mileage: 32M 54ch. The National Grid Reference Coordinates are LAT 52° 14' 59"N LONG 0° 48' 30"E (TL 918650). |
| Structures | The site comprises the railway and the pedestrian crossing point. The crossing is adjacent to an informal parking area. The site is |

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| Item | Details |
|---------------------------|---|
| | close to Thurston Station which comprises a station building (closed) and two platforms. The Station building and railway bridge are both designated Grade II listed buildings. |
| Track and electrification | The railway consists of two tracks and is not electrified. |
| Boundaries | The railway runs in an approximate east-west direction through the site. The pedestrian crossing runs in a north-south direction across the site and to the immediate east of the station. The line is adjacent to business units on both the north and south, with the crossing linked to an informal car park on the north side of the track. |
| Topography | The site has an approximate elevation of 50.0m AOD. |
| Access | Site access is via a small car park off Station Hill road to the north only. The crossing provides the only access to Platform 1 at Thurston Station. |
| Rights of way | There are no public rights of way in the vicinity of the crossing. |
| Route classification | Secondary. |

7.1 Traffic Issues

A 9-day census was carried out at the foot crossing by Sky High in April 2015. The total pedestrian count over the 9-day period was 1170 with these predominantly being adults. A small proportion of the users were accompanied and unaccompanied children, elderly people or people pushing a pram. The busiest day was recorded as being Day 7 (Friday) of the census with a total user count of 205. For pedestrians, the busiest quarter hourly period occurred at 17:45 on Day 8 (Saturday) with 39 pedestrians.

A large community college is situated 0.5 miles north of the station crossing, and a primary school is 0.7 miles away. A morning and evening peak was observed which may be due to pupils travelling to these schools or to commuters travelling to nearby towns and cities.

7.2 Highway Design Requirements

The preferred option is for a diversion of pedestrians via the existing road/footway network and a new connection to the Up line. The route is shown on Drawing No 144179-THJ-TS-DRG-00020 in Appendix D. It passes under the brick arched railway bridge (No 152CCH) which has a height restriction for road traffic of 13' 9" (4.19m). The existing road markings on the approaches and under the bridge demarcate a line for high vehicles (less than 13'9") to follow to avoid hitting the curve of the arch. There is a footway either side of the road here. The existing footway on the west side narrows from approximately 1.8m to 0.5m and then ends just south of the bridge. The footway on the east side widens from approximately 0.76-1.09m in a southerly direction. The footway on the east side would need to be widened to be suitable for the diverted pedestrians. This would necessitate narrowing the road to a single lane under the bridge and the installation of a traffic light control system. Guidance suggests that the footway should be widened to a minimum of 2.0m, with a preferred width of 2.6m. Due to the alignment required for the single lane road under the bridge the footway can only be widened to circa 2.0m.

With the existing highway arrangement, Beyton Road and Station Hill are within close proximity to the bridge. Due to visibility constraints and space constraints for the swept paths of vehicles it would be necessary for Barton Road, Station Hill, New Road and Beyton Road to all become signalised. Drawing No 144179-THJ-TS-DRG-00020 shows a potential layout for this option.

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The proposed layout shows a passenger access ramp from the footway south of the bridge up to the level of Platform 1. The ramp ties into the level area currently forming the end of the level crossing adjacent to the platform ramp. The layout shows the passenger access ramp leading down from Platform 1 at a skew to avoid cutting into the embankment which supports the railway. Detailed topographical and geotechnical surveys will be required prior to further design of the ramps.

7.3 Civil Engineering Assumptions

Table 2

Civil Engineering Design Assumptions Log

| No | Assumption |
|----|--|
| 1 | Assumed that the local highway authority use the DMRB for highway design. |
| 2 | Assumed that the passenger access ramp will require lighting. |
| 3 | Assumed that the traffic flows recorded in the 9-day traffic census are typical flows throughout the year. |
| 4 | Assumed that a full scale ground investigation will be undertaken to investigate the ground and geo-environmental conditions. |
| 5 | Assumed that the existing platforms are built on piles. Modular frame founded on concrete pads in the embankment slope. Concrete pads assumed to be pile caps. |
| 6 | Assumed that loss of the car park areas north of the railway would be unacceptable to NR and stakeholders. |
| 7 | Assumed an embankment height of 5m. |
| 8 | Assumed that the modular ramp design as per NR standard details will be used. The alternative would be a solid construction with retaining walls. |
| 9 | Assumed that reductions in sight distances to traffic signals will be acceptable to the highways authority. |
| 10 | Assumed that there will be no damage or alterations to Thurston Station and Railway bridge Grade II listed buildings. |
| 11 | Assumed that there are no hidden obstructions that could affect the proposed road layout or the location of the passenger access ramps. |

8 Cost Estimates

The budgetary estimates below are built up using 2011 rates from Spon's Civil Engineering and Highway Works Price Book and estimates of quantities for the significant elements. Then engineering judgment and optimism bias percentages have been added to account for the elements that have not been quantified and what is unknown at this stage.

The optimism bias of 44% has been applied based on advice contained in the supplementary Green Book (Appraisal and Evaluation in Central Government) guidance on optimism bias. The percentage applied can be reduced as the design progresses and more detail is known and risks reduced or removed.

Possession lengths will depend on the structure option chosen but a figure obtained from Network Rail for a weekend possession has been used in the calculations.

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Land costs have been derived using the footprint for the alignment and the current rate for an acre of bare land which according to RICS (Royal Institution for Chartered Surveyors) is £8223. This figure could be higher if the land is quality arable land or designated for development. The land cost estimate does not include for potential compulsory purchase order processes.

The percentage costs for Network Rail input can vary between 6% and 12%. Based on the type of work involved for the proposed works 10% has been the figure used for this cost estimating exercise.

As the construction costs have used 2011 rates the construction price indices have been used to bring the cost estimates up to Quarter 3 2014 prices.

The estimated cost breakdown for the preferred option is contained within Appendix E.

The estimated costs for the closure, construction of a pedestrian ramp, layby, change to the public road and footway layout is £1.0M.

9 Business Case Appraisal against Whole Life Costs

It was not deemed necessary to run Whole Life Cost Modelling (WLCM) on these options as would only be comparison of capex costs.

10 Programme

The indicative timescales summarised below are the anticipated durations from the start of GRIP Stage 4 to commissioning for each option. These are built up using generic project schedules wherever possible. The timescales include a 20% allowance for optimism bias.

Closure, construction of a pedestrian ramp, layby, changes to the public road and footway layout 36 months

Note: The indicative timescale shown above includes a 12 month allowance for highway authority liaison and land purchase.

11 Key Risks

Risks associated with the progression of the preferred option are detailed below in Table 3. Other risks associated with safety of the works, such as unknown ground conditions and buried services, are covered in the Design Risk Assessment in Appendix F.

Table 3

| Risk Item | Risk Description | Risk Level | Reason for risk level | Mitigation measures |
|---|--|------------|--|--|
| Objection to proposals by the local highway authorities | Potential objection to proposed road layout changes and traffic control system. | High | Affects local authority assets, road safety and maintenance legacy | Early negotiation and agreement with stakeholders. |
| Objection to proposals by landowners | Potential objection from land owners to the taking of the wooded area for construction of a road. | High | Proposals affect area of woodland. | Early negotiation and agreement with landowners. |
| Objection to proposals by stakeholders | Potential opposition from passengers regarding the closure of the level crossing and the diversion length. | High | Diversion adds time to journeys. | Early negotiation and agreement with stakeholders. |

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| Risk Item | Risk Description | Risk Level | Reason for risk level | Mitigation measures |
|--|--|------------|--|---|
| Objection to proposals by stakeholders | Risk of opposition to traffic signal controlled junction in close proximity to housing. | Medium | Traffic light controlled junction could increase light and noise pollution. | Early negotiation and agreement with stakeholders. |
| Objection to construction strategy by stakeholders | Risk of refusal to use Cracknell's garage car park for construction plant by owners/tenants. | Medium | Proposals affect the business | Early negotiation and agreement with stakeholders. If agreement cannot be obtained then an alternative construction strategy will be required. |
| Objection to proposals by stakeholders | Potential objection to design of proposed passenger access ramps | Low | Does not affect land or assets owned by others but would create visual impact on landscape. This has been minimised by the proposed location of the ramps behind the car garage. | Early negotiation and agreement with stakeholders. |
| Space constraints | Risk that there is not enough space within the NR boundary for the proposed ramps | Medium | OS map indicates sufficient space but footprint for ramps is tight up to the boundary. | Carry out topographical survey early in the next stage. |
| Stakeholder management | Risk that stakeholders are missed or not properly consulted leading to objections to the proposals. | Medium | All stakeholders to a project are not easily recognised and those that are consulted can require various means of communication and negotiation techniques. | Ensure the stakeholder list is robust and skilled personnel carry out the consultation processes. |
| Transport and Works Act (TWA) could not be granted | Risk that the TWA is applied for but is not granted by the Secretary of State as the proposals are considered unacceptable following numerous robust objections. | Low | Project provides safety benefits to level crossing users. Initial design has considered potential stakeholder issues and mitigated where possible. | Early negotiation with stakeholders and development of mitigation measures. |

12 Assumptions

- Closure options will be accepted by external stakeholders

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- Funding will be made available for the scheme
- It is assumed the Highway Agency will adopt the new road layout and the traffic light system.

Access Strategy

If agreement is given to use adjacent land for the lifting crane and material store then closure and diversion of pedestrians via the underbridge and an access passenger ramp south of the line would require minimal access to the railway other than the connection of the ramp to Platform 1 and recoveries. If agreement is not given, then the ramp components would need to be lifted into position using a track mounted crane and either multiple non-disruptive possessions or a disruptive weekend possession.

The construction of the tie in to Platform 1 and the removal of the foot crossing would need to be carried out under a rail possession. Standard non-disruptive possessions are available each Saturday night for approximately 8hrs based on the Engineering Access Statement for 2013. A single possession should be sufficient for the removal of the foot crossing and the construction of the tie-in of the passenger access ramp. Further non-disruptive possessions are available on the Sunday night and mid-week nights if required.

Road and lane closures would be required to carry out the changes to the highway network.

13 Interface with other Projects

The following projects/works have been identified to date in the area of the level crossing site:

- Redoubling of Haughley Jn project. There will be an increase in the number of freight trains. It is expected to increase to 30+ each day per direction by 2030. The Ipswich to Peterborough service is also expected to double adding around 7-8 trains per day in each direction.
- Anglia 200 TWAO project. There may be an opportunity to add this crossing to this project if a TWAO is required.

14 Impact on Stakeholders

The impact to stakeholders from the feasible options assessed within this report is outlined below. Closure and construction of pedestrian ramp, layby, change to public road and footpath layout. Resulting risk scores: ALCRM: M13, FWI: 0

Impact to users of the public highway

There would be an improved to pedestrians who use the footpath under the railway bridge, due to the footpath being widened.

The fitment of the traffic lights to the railway bridge will allow for a safer way of crossing the road, than the current where it is not possible to see approaching vehicles from certain positions.

Road users of the railway bridge will benefit from the reduced likelihood of the bridge being struck by a road vehicle and causing the road to be blocked, causing delay.

The proposed option could increase journey times, and effort required for those currently using the crossing to access platforms.

Impact to users of the railway

There would be a change in the way the railway station of Thurston is accesses. Pedestrians will now not cross the railway; instead they will have to use the new up platform access.

Experience a more reliable railway due to the removal of a conflict point and reduction of number of assets, therefore removing failure points.

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Impact to local residents and businesses

There will be a reduction in noise from the removal of the audible warning that the current MSL has.

Impact to train operators

There will be a change in the appearance of the railway, resulting in fewer distractions.

Impact to Maintenance

Removal of the level crossing and all its components will remove its need for maintenance.

Impact to Infrastructure operators

There is a reduction in point's failure. A simpler railway with less railway infrastructure.

15 Consents Strategy

The required consents to date for the site are detailed below, including the strategy for how they will be obtained. A full consent strategy will be completed by liabilities.

Planning Consent may be required for land purchase for construction of new roads. This would be progressed in GRIP Stage 3 through Town Planning who will liaise with the Local Authority.

Network Change would be required for closure due to the removal of the level crossing. This shall be progressed early in GRIP Stage 3 in conjunction with the Network Change Co-ordinator.

Station change will be required; this shall be progressed in GRIP 3.

A Level Crossing Revocation would be required for all closure options and this shall be progressed throughout the project lifecycle in accordance with Office of Rail and Road (ORR) guidelines.

Where necessary, a Street Works Notice shall be submitted to the Highways Interface Clerk during GRIP Stage 3 to aid co-ordination with the local Highways Authority.

16 Environmental Appraisal

An Environmental Appraisal has been completed. The following Environmental Implications and Risks have been identified at the site (where applicable to the options assessed):-

- There is thick undergrowth on the embankment between the up side and Beyton Road. Plants and wildlife unknown. Vegetation removal is required outside railway land.
- The area has a mix of residential housing and businesses.
- The railway is constructed on an embankment.
- The main car park (access to Down side) has no defined footpath and is used by local businesses.
- The proposed layby is to be constructed outside railway land on the up side.
- New pedestrian movements will be introduced via the proposed new road layout.

17. Engineering Outputs

Engineering outputs would be aligned with the Project Characterisation Tool (PCT).

18 Contracting Strategy

The anticipated Contracting Strategy for level crossing closure is for the recommended closure options to be categorised based on the outputs from GRIP 2 feasibility consultations. The categorisations will outline the most suitable strategy for successful closure. It is recommended for GRIP 3 a consultant is used with the necessary railway and stakeholder engagement experience; this

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work will be awarded to a Framework Contractor or through competitive tendering led by the procurement team.

19 GRIP 2 Deliverables

The following deliverables have been produced during GRIP Stage 2 to inform the production of this Feasibility Report:-

- Environmental Appraisal & Action Plan
- Draft Diversity Impact Assessment
- Civils scheme sketch(s)

A Site Visit has been held with the Route Asset Management team and representatives from the Network Rail Operations, Maintenance and Risk teams.

Liabilities and Negotiations have also been consulted to gauge the potential for closure.

20 Conclusion and Recommendations

Closure of Thurston Station level crossing is recommended through means of constructing a new pedestrian ramp, from Platform 1 (Upside) down the embankment leading onto Beyton Road. The design is to include a drop off point / layby for vehicles along Beyton Road.

Due to the physical characteristics of the rail bridge in situ, a new road layout and traffic light system is recommended to accommodate both vehicle and pedestrian use.

A scheme sketch has been developed to prove the feasibility of constructing a suitable ramp and layby.

No other closure options were considered as feasible.

Considerations will need to be made for the local businesses and housing to maintain their access during construction and afterwards.

21 Client and Stakeholder Acceptance

This Feasibility Report shall be issued for consultation with the following key stakeholders:-

- Maintenance
- TOC (Abellio Greater Anglia)
- Highway Authority
- Operations
- Risk Specialist
- Route Enhancements
- Liability and Negotiations

A 14 working day consultation period shall be allowed to capture stakeholder comments on the proposed Single Option. A consultation meeting will be conducted on day 7, with 7 review days remaining.

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A Stakeholder Document Feedback Form shall be issued with the Feasibility Report so that consultation comments are captured in a consistent format.

Stakeholder comments shall be collated on a Stakeholder Consultation Log and each comment shall be addressed to the satisfaction/agreement of the respective stakeholder. The resolution and closure of stakeholder comments shall also be recorded on the Stakeholder Consultation Log.

If the comments are believed to have resulted in a fundamental change, the document shall be updated and re-issued for a second consultation period of 5 working days. *This shall be by exception only.*

To view the consultation log, please see Appendix F, or click on the CCMS2 hyperlink in the reference table below.

22 References

| | Title | Version | Date | CCMS2 Link |
|----|-----------------------------------|---------|------|--------------------------|
| 1. | Draft Diversity Impact Assessment | 1 | | 65266986 |
| 2. | Draft Environmental Appraisal | 1 | | 65330819 |
| 3. | RRD | 1 | | 65233900 |
| 4. | Stakeholder Consultation log | 1 | | 65323987 |

23 Appendices

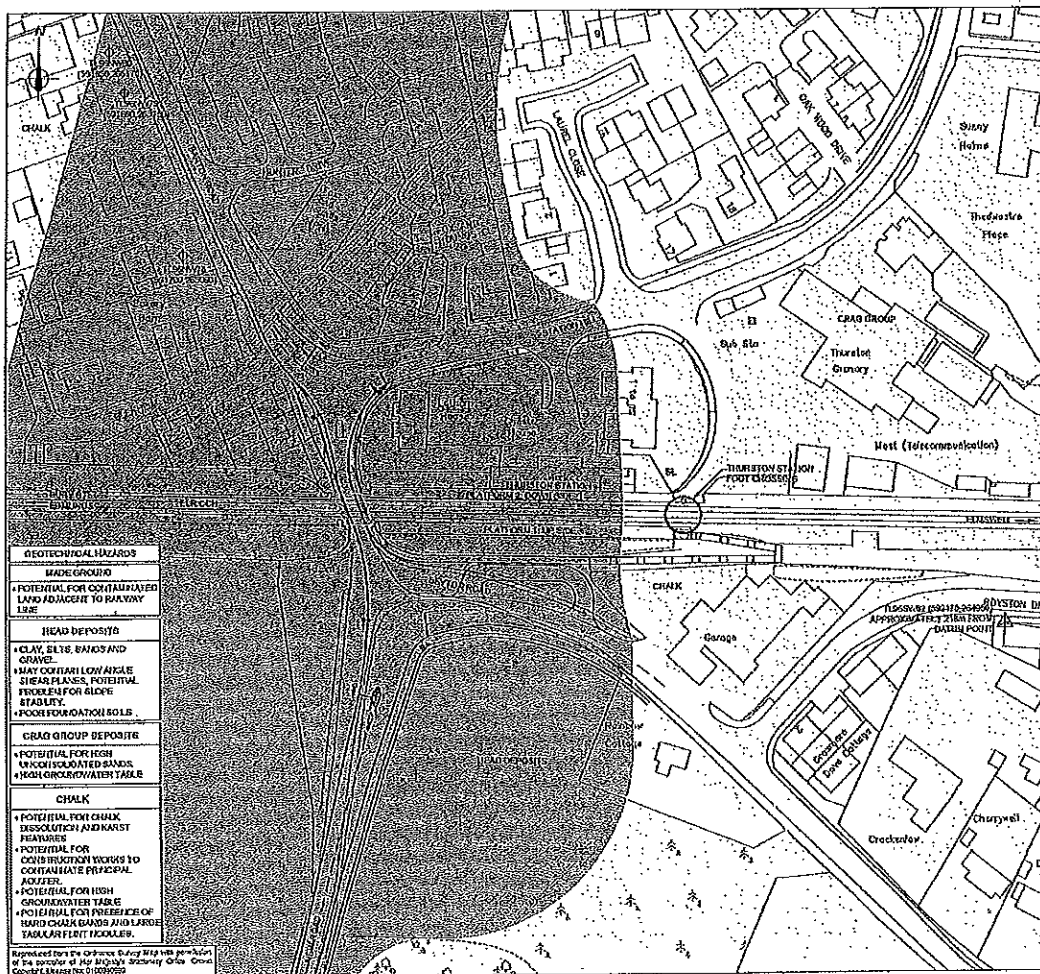
- A Geotechnical Features Map
- B Geotechnical Considerations
- C Option Drawing
- D Breakdown of Construction Cost Estimate
- E Design Risk Assessment
- F Consultation Log

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Appendix A: Geotechnical Features and Hazards Map



KEY:

- ALIGNMENT OF UNDERLINE OR GAGE
- PROPOSED LAYOUT
- PROPOSED TRAFFIC SIGNALS
- SITE BOUNDARY
- DOG HOLE LOCATIONS
- △ DATA POINT, USED TO REFERENCE BOREHOLE LOCATIONS
- HEAD DEPOSIT
- CRAG GROUP
- CHALK FORMATION (SILVER CHALK FORMATION, LEWIS CHALK FORMATION, SEAFORD CHALK FORMATION, LEVES DOCKLAND CHALK FORMATION (EXCEPTIVE))

NOTES:

1. DUE TO LACK OF REFERENCE POINTS, INFORMATION SHOWN OUTSIDE OF CG TILES IS QUALITATIVE ONLY.
2. UNCHANGED IS ENTERED AS A REFERENCE ONLY. MEASUREMENTS SHOULD NOT BE TAKEN FROM DRAWINGS TO BE READ IN CONJUNCTION WITH DRAWING NO. 144179-TS-TS-CRS-0002.

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| Rev | 1 | 10/02/13 | SD | A | 13 |
| Rev | 2 | 10/02/13 | SD | A | 13 |

FOR INFORMATION

NetworkRail

ATHJV
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144179
ANGLIA ROUTE LEVEL CROSSING
CLOSURES FEASIBILITY STUDIES
PACKAGE 6 - WOODBRIDGE CROSSINGS

THURSTON STATION LEVEL CROSSING
GEOLOGICAL FEATURES AND HAZARDS

| | | | |
|----------|-------------------|-----|------|
| DATE | DESCRIPTION | BY | CHKD |
| 02/04/13 | CADENCE CHECK | SPH | SPH |
| 02/04/13 | CADENCE CHECK | SPH | SPH |
| 02/04/13 | AMENDMENTS | SPH | SPH |
| 02/04/13 | WASSILY REVISIONS | SPH | SPH |

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144179-TS-TS-CRS-0002 01

Appendix B: Geotechnical Considerations

1. Introduction

The following section comprises a desk study which reviews the geotechnical and ground conditions for the proposed works at Thurston Station, Suffolk. The information informing the desk study was collected from the British Geological Survey (BGS) website, the Environment Agency (EA) website and from publically available aerial photographs. The available information was reviewed and the potential geotechnical hazards are discussed in the main report. Recommendations for further ground investigations are presented.

2. Site Geology

The geological map (BGS, 1982) and BGS's "Geoindex" website (<http://mapapps2.bgs.ac.uk/>) indicates the site is underlain by a series of Head deposits which overlie the Chalk bedrock. Approximately 100m to the east and west of the site, deposits of the Crag Group outcrop.

The BGS Lexicon of Named Rock Units describes the deposits as:

Head deposits consists of clay, silt, sand and gravel, which were formed up to 3 million years ago in the Quaternary Period. The local environment was previously dominated by subaerial slopes. Head deposits are typically described as polymict which comprises gravel, sand and clay depending on upslope source and distance from source. They are generally poorly sorted and poorly stratified deposits formed mostly by solifluction and/or hill wash and soil creep. They essentially comprise sand and gravel, with locally occurring lenses of silt, clay or peat and organic material.

The Crag Group consists typically of Sand and Gravel, which was formed about 5 million years ago in the Quaternary and Neogene Periods. The sands are characteristically dark green from glauconite but weather bright orange with hematite 'iron pans'. The gravels in the lower part of the group are almost entirely composed of flint, with a basal layer of glauconitic conglomerate of rounded flints. The Crag Group tends to form a sharp, planar unconformity with deposits from the White Chalk Subgroup in this area.

The Chalk consists of undifferentiated deposits of the Lewes Nodular Chalk Formation, Seaford Chalk Formation, Newhaven Chalk Formation and the Culver Chalk Formation all from the White Chalk Subgroup or in former terminology the Upper Chalk. The Lewes Nodular Chalk Formation being the oldest chalk strata. The chalk was formed approximately 71 to 94 million years ago in the Cretaceous Period. The Lewes Nodular Chalk Formation is composed of hard to very hard nodular chalks and hardgrounds with interbedded soft to medium hard chalks and marls. The Seaford Chalk Formation is a firm white chalk with semi-continuous nodular and tabular flint seams with occurrences of hardgrounds and thin marls in the lowest beds. The Newhaven Chalk Formation is composed of soft to medium hard, smooth white chalks with numerous marl seams and flint bands, including distinct phosphatic chalks of limited lateral extent. The Culver Chalk Formation is described as a soft white chalk, relatively marl free, with flint seams. The flints are generally large and, in the upper part, tabular. The sequence is typically between 65 to 75m thick and forms the bedrock geology in the area.

Borehole scans available on the BGS Geoindex website identified a number of borehole well records in the vicinity of the proposed works. Unfortunately, all records give very limited information on the nature of the head deposits, the Crag Group and the Chalk. The ground conditions described on the well logs are summarised in Table 4 below. The locations of the borehole records are shown on Drawing No 144179-THJ-TS-DRG-0021.

Table 4: Summary of ground conditions reported in BGS well log near Thurston Station level crossing

| Well log Identification No. | Distance and direction from level crossing | Description of geology | Thickness (m) | Depth to base of the unit (m bgl) |
|-----------------------------|--|---|---------------|-----------------------------------|
| TL96NW98 | 100m northwest | No superficial deposits or made ground deposits described. Bedrock geology is described as Upper Chalk, now referred to | 40.23 | 40.23 |

| | | | | |
|----------|----------------|--|------------------------------|--------|
| | | as the White Chalk Subgroup. | | |
| TL96NW79 | 180m northwest | No superficial deposits or made ground deposits described. Bedrock geology is described as Upper Chalk, now referred to as the White Chalk Subgroup. | 13.72+ | 13.72+ |
| TL96NW80 | 200m northwest | No superficial deposits or made ground deposits described. Bedrock geology is described as Upper Chalk, now referred to as the White Chalk Subgroup. | 21.34 | 21.34 |
| TL96SW62 | 440m east | Sand and Gravel (possibly deposits of the Crag Group). Upper Chalk, now referred to as the White Chalk Subgroup. | Combined thickness of 21.34m | 21.34 |
| | | Upper Chalk, now referred to as the White Chalk Subgroup. | 15.84 | 37.18 |

3. Structural Geology and Mining

The geological map (BGS, 1982) indicates that the regional dip of the strata is to the south-east, dipping at a low angle. There is typically no structural distortion or faulting in this area.

According to the BGS Geindex website, there is no evidence of mining or quarrying in the vicinity of the site.

4. Hydrogeology and Hydrology

The BGS hydrogeology viewer classifies the White Chalk subgroup as a highly productive aquifer and the Crag Group as a moderately productive aquifer. The White Chalk subgroup deposits are up to 450m thick and can yield 50 to 100litres/second from large diameter boreholes and up to 300 litres/second from adited systems. The water quality is good, hard to very hard. The Crag Group deposits consist of fine grained, unconsolidated sands and silts up to 80m thick and can yield up to 40 litres/second. The water quality is hard and ferruginous.

According to the Environment Agency's What's in your backyard? Website Groundwater webpage, the site is located within a Groundwater Source Protection Zone (Total Catchment Zone 3) and a Groundwater Vulnerability Zone, being located on the junction between a Major Aquifer High zone and a Minor Aquifer High zone. The whole area is designated as a Principal aquifer.

According to the Environment Agency's 'risk of flooding from surface water' webpage, the site is at low to medium risk from surface water flooding. Low risk means that each year, this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%). Medium risk means that each year, this area has a chance of flooding of between 1 in 100 (1%) and 1 in 30 (3.3%).

The River Black Bourn occurs approximately 3.4km to the east although a land drain occurs on the eastern outskirts of Thurston village approximately 1km from the site.

There is likely to be the potential for groundwater to be present at shallow depths, particularly within any Made Ground or superficial deposits. Groundwater within the Crag Group and chalk deposits is

likely to be affected by local abstraction rates. According to the Environment Agency, water is currently being abstracted approximately 500m to the south of the site at Thurston House, where the size of abstraction is recorded as 'large'. Groundwater records from the borehole well logs indicate depths between 7.6m (TL96NW80) and 21.5m (TL96SW62) pre-1969. Any proposed ground investigation should target verifying current groundwater levels.

5. Geotechnical Risk Register

The geotechnical hazards identified in Section 5.2 and other ground and environmental hazards associated with the proposed development are summarised in a geotechnical risk register presented in Table 5. All costs associated with these risks are approximate and are subject to change.

6. Recommendations for Ground Investigation

A ground investigation is recommended to verify the composition of the railway embankment and its structural properties and to determine the ground conditions for piled foundations for the access ramps. The ground investigation should comprise a series of cable percussive and or rotary core boreholes with sampling and laboratory testing. The investigation needs to fulfil the requirements of Eurocode 7.

The borehole investigation should be undertaken to identify the quality and engineering properties of the Chalk, which would likely be the founding stratum for the piled access ramps. The boreholes should be advanced by cable percussive and or rotary core drilling depending on the hardness of the Chalk. To achieve the requirements of Eurocode 7 for the design of structures, the termination depth of boreholes shall therefore be greater than 6m below the base of the footing or 3 times the footing width of the structure and include between 2 and 6 investigation points per foundation. Aquifer protection measures would be required in the Crag Group and Chalk deposits.

Further investigations should be targeted on the railway embankment to assess the structural properties, soil-structure interaction and stability to assess the suitability its use for the access ramp.

The boreholes should be installed with slotted standpipe piezometers or vibrating wire piezometers to allow monitoring (i.e. levelling, sampling and testing) of groundwater levels.

Geo-environmental testing for contamination should be undertaken in the surface deposits particularly in the immediate environs of the rail tracks.

7. References

British Geological Survey. 1982. Bury St. Edmunds. England and Wales Sheet 189. Solid and Drift Geology. 1: 50 000. British Geological Survey. Keyworth, Nottingham.

British Geological Survey. No date. Borehole scans (online). Available from <http://scans.bgs.ac.uk/>. TL96NW78, TL96NW79, TL96NW80 and TL96SW62. Accessed 17 June 2015.

British Geological Survey. Geindex viewer (<https://mappapps2.bgs.ac.uk/>)

CIRIA. 2002. Engineering in Chalk. CIRIA Report C574, CIRIA, London.

Environment Agency website: What's in your backyard? (<http://www.environmentagency.gov.uk/homeandleisure/37793.aspx>)

Table 5
Thurston Station
Quantified Geotechnical Risk Register

| Risk Ref | Cause (known control weakness or assumption "as a result of") | Event (future/uncertain "may be possibility of that") | Consequence (to objectives "which would lead to") | Min (£k) | Max (£k) | Likely (£k) | Likelihood | Mean outcome (£k) |
|----------|--|---|--|----------|----------|-------------|------------|-------------------|
| 001 | Unknown nature and extent of Made Ground and Head deposits, associated with railway network and surrounding land use | Bearing failure, contaminated soils. | Implement ground improvement measures. Treat or remove contaminated soils. | 0 | 50 | 10 | 10% | 1 |
| 002 | Presence of contaminated ground in the vicinity of the railway network and site | Hazardous to workers. High removal costs. | Treat or remove contaminated ground if required. | 0 | 50 | 20 | 25% | 5 |
| 003 | Aggressivity of soils and groundwater to concrete | Chemical attack of buried concrete. | Design concrete to resist chemical attack. Additional protective measures may be required. | 0 | 20 | 5 | 10% | 0.5 |
| 004 | Unknown nature and extent of Crag Group deposits (sands and gravels) | Bearing failure, instability | Implement ground improvement measures. | 0 | 50 | 10 | 10% | 1 |
| 005 | Excavating in sand and gravel soils, with high groundwater tables | Instability, collapse of excavations | Dewater and shore excavations. | 0 | 100 | 20 | 50% | 10 |
| 006 | Unknown extent of Chalk weathering | Bearing failure, total or differential settlement. | Excavate and replace material. Pile or improve the ground beneath any structures. | 0 | 100 | 50 | 50% | 25 |

Table 5
Thursfon Station
Quantified Geotechnical Risk Register

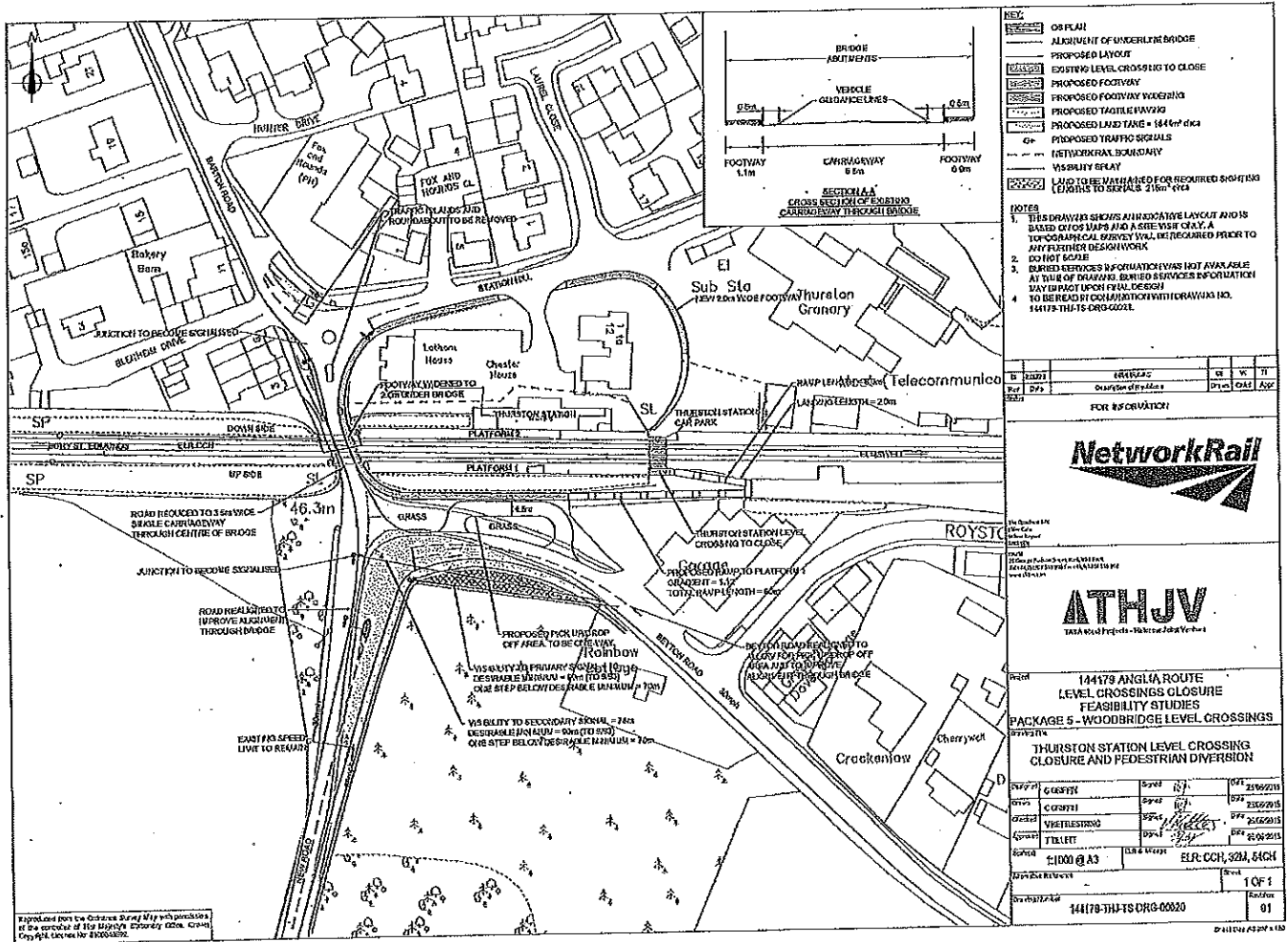
| Risk Ref | Cause (known control weakness or assumption "as a result of") | Event (future/uncertain "may be possibility of that") | Consequence (to objectives "which would lead to") | Min (£k) | Max (£k) | Likely (£k) | Likelihood | Mean outcome (£k) |
|----------|---|--|---|----------|----------|-------------|------------|-------------------|
| 007 | Karst landscape, dissolution or manmade features | Voids located close to the surface which could migrate and undermine any structures. | Pile below voids. Grout voids. | 0 | 100 | 50 | 25% | 12.5 |
| 008 | Drilling in Chalk (during ground investigation) | Pollution and contamination of the Principal Aquifer. | Aquifer protection measures to be implemented during drilling. | 0 | 100 | 10 | 80% | 0.8 |
| 009 | Presence of flints and hard bands in the Chalk | Obstruction to piling, excavation and drilling | Use rotary coring methods. Ensure pile driveability with larger pile section. | 0 | 100 | 50 | 50% | 10 |
| 010 | Frost susceptibility of exposed chalk faces | Heave and settlement of supported structures and pavements. | Ensure road construction is thick enough to prevent frost action and cover any exposed chalk faces. | 0 | 100 | 50 | 50% | 10 |
| 011 | Unknown buried and overhead services | Risk of striking services, major costs and fatalities. | Divert or protect services. | 0 | 1000 | 200 | 5% | 10 |
| 012 | Unexploded Ordnance. The site lies within a "No Risk" area as defined by Zetica (http://zeticauxo.com/) | Risk of explosion and fatalities. | Research local records and talk to local residents. Toolbox talks. | 0 | 300 | 50 | 5% | 2.5 |

Table 5
 Thurston Station
 Quantified Geotechnical Risk Register

| Risk Ref | Cause (known control weakness or assumption "as a result of") | Event (future/uncertain "may be possibility of that") | Consequence (to objectives "which would lead to") | Min (£k) | Max (£k) | Likely (£k) | Likelihood | Mean outcome (£k) |
|----------|---|--|---|----------|----------|-------------|------------|-------------------|
| 013 | Unknown depth to groundwater table. | Risk of flooding of excavations. | Excavations may require dewatering. | 0 | 50 | 20 | 10% | 2 |
| 014 | Presence of buried archaeological deposits and listed buildings | Risk of damage and destruction of important archaeological features and listed buildings. Delays to programme. | Toolbox talks and/or archaeological investigations along proposed routes. | 0 | 50* | 10 | 10% | 1 |

* Delays to programme not costed.
 All costs are approximate.

Appendix C: Option Drawings



Appendix D: Breakdown of Construction Costs Estimate

Thurston Station Level Crossing Closure Estimated Costs

Estimated Construction Costs

| Item description | Level Crossing closure and new pedestrian route via existing bridge and new passenger access ramp |
|---|---|
| Site Clearance | 20,000 |
| Groundworks | 40,000 |
| Road widening | 170,000 |
| Drop-off point | 22,000 |
| Footway | 16,000 |
| Access ramp | 25,000 |
| Traffic signals | 40,000 |
| Sub total | 333,000 |
| Construction preliminaries (10%) | 33,300 |
| Optimism bias (44%) | 161,172 |
| Contractors overheads and profit (10%) | 52,747 |
| Total Construction costs at 2011 rates | 580,219 |
| Total Construction costs at 2014 rates | 660,000 |

Estimated Project Costs

| | |
|---|----------------|
| Land purchase | 3,600 |
| Services protection or diversion | 50,000 |
| Level Crossing Closure -Design and Construction | 20,000 |
| sub total | 73,600 |
| Network Rail PM costs (10%) | 70,000 |
| Design Development -GRIP3-4 | 60,000 |
| Ground investigation and topographical survey | 35,000 |
| Design Development -GRIP5-8 | 30,000 |
| Construction supervision | 10,000 |
| Total scheme costs (£) | 938,600 |
| Rounded up to nearest £100k | 1,000,000 |

Appendix E: Design Risk Assessment

| Project | | 44178 Angila Road Level Crossings Closure Feasibility Studies Package B | Location | | Thetford Station, Thetford, Norfolk | Sluice | GRP2 | ANTICIPATED MEASURE THAT COULD BE APPLIED BY THE CONTRACTOR (IF OTHER) |
|---------|---|---|------------------------------|-----------------------------|-------------------------------------|--|-----------------------------|--|
| Id | HAZARD | CORRECTION OF HAZARD (ISSUE) | RISK LEVEL BEFORE MITIGATION | RISK LEVEL AFTER MITIGATION | Risk Owner | Mitigation Measure to be taken by Designer | Risk Level After Mitigation | Control |
| 1 | Early Work on Site (EWS) at 44178 Angila Road | Control of the site perimeter and traffic loading to avoid | 3 | 1 | Contractor | Control of site perimeter and traffic loading to avoid | 3 | 1 |
| 2 | Early Work on Site (EWS) at 44178 Angila Road | Control of the site perimeter and traffic loading to avoid | 4 | 2 | Contractor | Control of site perimeter and traffic loading to avoid | 4 | 2 |
| 3 | Use of Excavation at 44178 Angila Road | Control of the site perimeter and traffic loading to avoid | 3 | 3 | Contractor | Control of site perimeter and traffic loading to avoid | 3 | 3 |
| 4 | Early Work on Site (EWS) at 44178 Angila Road | Control of the site perimeter and traffic loading to avoid | 3 | 3 | Designer/Contractor | GRP2 | 1 | 6 |
| 5 | Use of Excavation at 44178 Angila Road | Control of the site perimeter and traffic loading to avoid | 3 | 3 | Contractor | Control of site perimeter and traffic loading to avoid | 3 | 3 |
| 6 | Use of Excavation at 44178 Angila Road | Control of the site perimeter and traffic loading to avoid | 3 | 4 | Designer | GRP2 | 1 | 4 |
| 7 | Use of Excavation at 44178 Angila Road | Control of the site perimeter and traffic loading to avoid | 4 | 4 | Designer | GRP2 | 4 | 3 |
| 8 | Use of Excavation at 44178 Angila Road | Control of the site perimeter and traffic loading to avoid | 4 | 4 | Contractor | Control of site perimeter and traffic loading to avoid | 4 | 4 |
| 9 | Use of Excavation at 44178 Angila Road | Control of the site perimeter and traffic loading to avoid | 6 | 6 | Designer | GRP1 | 2 | 6 |

Appendix F: Consultation Log

**Level Crossing Development Team
Document Review Feedback Form and Consultation Workshop notes**

| Document Details | |
|---|--|
| Project Name: | Anglia Closure Feasibility Studies -- Package 5 |
| Business Plan or OP Reference: | 144179 |
| Level Crossing Names: | Thurston Station, Jetty Avenue, Kingston Farm, Dock Lane, Bloss, Maltings, Melton Sewage, Melton Station and Ellingers |
| Document Title: | Feasibility report |
| Date: | 26 th August 2015 |
| Document Version: | 1.0 |
| Stakeholder Document Feedback Form Return Details (LCDT Representative) | |
| Name: | Rachel Jones |
| Title/Position: | Project Development Assistant |
| Telephone Number: | 07710 958369 |
| Email Address: | Rachel.jones@networkrail.co.uk |
| Reviewers | Sean Cronin, Georgina Aruxandel, Steve Day, Mike Essex, Thomas Shannon, Kenneth Gray, Adrian Webb, Daniel Fisk, Michael Jacques, Mike Lewis Rachel Jones, Andy Kenning, George Onaya and Hugo Nobrega |

**Level Crossing Development Team
Document Review Feedback Form and Consultation Workshop notes**

| No. | Page | Section | Feasibility report name / LC | Stakeholder Comment | Comment Cat. (see below) | Initials |
|-----|------|---------|------------------------------|--|--------------------------|----------|
| 1 | 4 | 1 | Thurston Station | Reference to highway is inappropriate in this case. Consider rewording in terms of removing any interface where a person or vehicle could be struck by a train. | 1 | SD |
| 2 | 4 | 1 | Thurston Station | Reference to the Haughley end is unclear, as there is no Haughley station. Suggest Elmswell end, which is more easily discernible. | 1 | SD |
| 3 | 4 | 1 | Thurston Station | The level crossing provides access from the down side, where the station entrance is to the up platform and acts as the only means of accessing the up platform. | 1 | SD |

Level Crossing Development Team Document Review Feedback Form and Consultation Workshop notes

| | | | | | | |
|---|-------------------------------|-----|------------------|---|---|----|
| 4 | N/A | | Thurston Station | Looking at feasibility of carriageway singling under the bridge, I would like to see the following data: <ul style="list-style-type: none"> • Current width of road under bridge • Wide enough for 2 vehicles to pass? And if so, what if one's a tall vehicle? • History of accidents under the bridge (from Suffolk Road Safety) • Census of usage with road vehicles and pedestrians. Essential element in convincing Suffolk. | 3 | SD |
| 5 | N/A | | Thurston Station | Are all the main 'attractions', and most housing, north of the railway line in Thurston? Please confirm. | 1 | SD |
| 6 | N/A | | Thurston Station | Overall, a very good proposal that just needs a little fleshing out. | 1 | SD |
| 7 | N/A | | Thurston Station | NR has some former land in the area. I shall order the Deeds and keep them on file. | 1 | SD |
| 8 | Note from workshop 14/08/2015 | N/A | Thurston Station | Car park is not on NR land | 1 | SD |
| 9 | Note from workshop 14/08/2015 | N/A | Thurston Station | Possible need to add a stepped link on the ramps to make a shorter route for able bodied users. | 3 | AK |

Level Crossing Development Team Document Review Feedback Form and Consultation Workshop notes

| | | | | | | |
|----|-------------------------------|-----|--------------------------------|--|---|----|
| 10 | Note from workshop 14/08/2015 | N/A | Thurston Station | Design is only 1:12 and likely to need to be 1:20 | 3 | AK |
| 11 | Note from workshop 14/08/2015 | N/A | Thurston Station | Possibility of adding a disabled parking space | 2 | AK |
| 12 | Note from workshop 14/08/2015 | N/A | Thurston Station | A Station lift was considered and discounted as it would entail construction of access ramps due to the topography | 1 | GO |
| 13 | Note from workshop 14/08/2015 | N/A | Thurston Station | TWAO required for highway alterations and verge changes. | 1 | AK |
| 14 | Note from workshop 14/08/2015 | | Jetty Avenue and Kingston Farm | Height restriction at the station due to footbridge. | 1 | AK |
| 15 | Note from workshop 14/08/2015 | | Jetty Avenue and Kingston Farm | Turning circle at ferry needs to be analysed with vehicle sweeping | 3 | AK |
| 16 | Note from workshop 14/08/2015 | N/A | Jetty Avenue and Kingston Farm | Potential bespoke bridge design to lessen impact. If stakeholders agree to the principle of overhead structure, detailed design to be undertaken in consultation with the stakeholders to achieve a structure sympathetic to the local environment | 3 | GO |
| 17 | Note from workshop 14/08/2015 | N/A | Jetty Avenue and Kingston Farm | Impact resistant bollards to be provided on the link road railway side | 2 | GO |

Page 4 of 5

Level Crossing Development Team (LCDT) Stakeholder Consultation Form

| Project Details | |
|--------------------------------|--|
| Project Name: | Anglia Closure Feasibility Studies -- Package 5 |
| Business Plan or OP Reference: | 144179 |
| Level Crossing(s): | Thurston Station, Jetty Avenue, Kingston Farm, Dock Lane, Bloss, Mallings, Melton Sewage, Melton Station and Ellingers |
| Consultation Type: | Feasibility workshop |
| Consultation Date: | 14 th August 2015 |
| Document Version: | 1.0 |
| LCDT Representative Details | |
| Name: | Rachel Jones |
| Title/Position: | Project Development Assistant |
| Telephone Number: | 07710 958369 |
| Email Address: | Rachel.jones@networkrail.co.uk |

| No. | Name | Title | Sign |
|-----|--------------|----------------------------|------|
| 1. | Rachel Jones | PDA-LCDT | |
| 2. | George Onaya | SPDM- LCDT | |
| 3. | Hugo Nobrega | PDA - LCDT | |
| 4. | MIKE LEWIS | LCM | |
| 5. | MIKE JACOBS | LCM | |
| 6. | Daniel Fox | RCCM | |
| 7. | ANDY KENNING | LX ENG LCDT | |
| 8. | STEVE DAY | LIABILITY NEGOTIATIONS ADV | |

Level Crossing Development Team (LCDT) Stakeholder Consultation Form

| | | | |
|-----|--------------------|-------------------------------|--|
| 9. | TS Shannon | Operations Manager | |
| 10. | GEORGINA ARUKANDEI | SPONSOR | |
| 11. | ISAAC ADJEI | COMMERCIAL MANAGER | |
| 12. | KEN GRAY | SENIOR ASSET ENG (SIGNALS) | |
| 13. | | | |
| 14. | | | |
| 15. | | | |
| 16. | | | |

| No. | Consultation Type | Comments | Status |
|-----|-------------------|----------|--------|
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Our Ref: 570/CON/5070/16
Date: 8th June 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: planningadmin@babberghmidsuffolk.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/5070/16

PROPOSAL: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except or access) for Land at Norton Road, Thurston

LOCATION: Norton Road, Thurston, Suffolk

ROAD CLASS: C

This letter is complimentary to those ref 570/CON/5070/16 dated 10th March 2017 and 6th April 2017 which detailed 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 from the public highway

1. Condition: No other part of the development shall be commenced until the new vehicular access has been laid out and completed in all respects in accordance with Drawing 618212/SK11 Rev A and has 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 accesses off Norton Road are first used visibility splays shall be provided as shown on Drawing 618212/SK02 Rev A with an X dimension of 2.4 metres and a Y dimension of 120 metres and thereafter retained in the specified form. 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 in order to take avoiding action.

3. 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.

4. 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.

5. 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 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.

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

Comment: All matters are reserved except for access although this includes approximately 90m of the eastern Minor Access Road that is proposed to provide a link to the proposed site of the Primary School. On this occasion it has been accepted that a minimum road width of 5.5 metres and a MfS design for visibility for 30mph is acceptable. This is a relaxation of the Suffolk Design Guide for Estate Roads and allowed on the basis that the site is urban and that traffic calming measures will be provided.

6. Condition: Before the accesses off the eastern Minor Access Road are first used visibility splays shall be provided as shown on Drawing 618212/SK11 Rev A with an X dimension of 2.4 metres and a Y dimension of 45 metres and thereafter retained in the specified form. 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 in order to take avoiding action.

7. 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.

8. 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.

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.

9. 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.

Public Transport

Comment: The nearest bus stop is approximately 500m from the site. It is proposed that additional bus stops and shelters are placed either side of Norton Road to the east of Rylands Close and this development provides a S106 contribution to do so.

Street Lighting

Note: The existing street lighting system may be affected by this proposal.

The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 0345 606 6067, in order to agree any necessary alterations/additions to be carried out at the expense of the developer."

Construction Management Plan

11. 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.

Highway S106 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 £7111 on commencement of the 100th dwelling.
2. Improvements to PROW 007 (un metalled) north of Meadow Lane. A contribution of £16500 in commencement of the 100th dwelling.

3. Contribution towards extension of speed limit on Norton Road. A contribution of £4267 on commencement of any construction work on site.
4. Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction. A contribution of £21838 on occupation of the first dwelling.
5. Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £68924 on commencement of any construction works on site.
6. Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road. A contribution of £12624 on commencement of the first dwelling.

Except for the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton the reasons for requesting these contributions are described above. The A143 improvements are mitigation to improve capacity at this junction reflecting the small individual but, in terms of cumulative impact, significant effect that the five developments will have at this junction.

These contributions and the costs attributed to each of the five development sites assume a collaborative approach as outlined in our letter of the 10th March 2017. If this site is determined as a stand-alone application, or planning permission considered only a number of these sites these conditions and contributions would need to be re-assessed.

Travel Plan and S106 Contributions

For a development of this size we would require a Residential Travel Plan to mitigate the highway impact of the proposed development. Based on the information that I have received from yourself we would require the following contributions:

7. Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum 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
8. Travel Plan Implementation Bond -- To be confirmed when a detailed application/Travel Plan is submitted. This will be used to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves

We would also require the following Section 106 obligations:

- Full Implementation of the Travel Plan and its monitoring
- Provision of an approved welcome pack to each dwelling after first occupation
- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

Yours sincerely



Steve Merry
Transport Policy and Development Manger
Resource Management

Agenda Item 7d

Committee Report

Committee Date: 12th July 2017

Item No:

Reference: 4386/16

Case Officer: Dylan Jones

Description of Development: Erection of 138 dwellings including the construction of a new vehicular access and provision of cycle/pedestrian link to Barton Road together with the provision of road and drainage infrastructure, landscaping and open space.

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

Parish: Thurston

Ward: Thurston & Hessett

Ward Members: Councillors Esther Jewson & Derrick Haley

Site Area: 5.26

Conservation Area: No

Listed Building: Manor Farm, Grade 2* listed and Grange Farmhouse, Grade 2 Listed.

Received: 26/10/2016

Expiry Date: 30/06/2017

Application Type: Full Planning Permission

Development Type: Smallscale Major Dwellings

Environmental Impact Assessment: Schedule 2 development – EIA not required.

Applicant: Bovis Homes Ltd

Agent: Artisan PPS Ltd

DOCUMENTS SUBMITTED FOR CONSIDERATION

The defined Red Line Plan for this application is drawing number THU-P-000 received on the 26th October 2016. This drawing is the red line plan that shall be referred to as the defined application site. Any other drawings approved or refused that may show any alternative red line plan separately or as part of any other submitted document have not been accepted on the basis of defining the application site.

Submitted Documents:

Tree Constraints plan reference number LSDP 11341-01 Rev A dated 8th March 2017

Planning layout plan reference number THU-P-001 received on the 26th October 2016

Materials plan reference number THU-P-002 received on the 26th October 2016

Landscape proposals plan LSDP 11341-02A dated 8th March 2017
House type drawing pack received on 8th March 2017
Base planning unit reference number THU-P-001R received on the 8th March 2017
Pumping station figure 4 received on the 8th March 2017
Archaeology report received on the 26th October 2016
Contaminated land and geotechnical study received on 26th October 2016
Design and Access Statement received on 26th October 2016
Ecological Appraisal received on 26th October 2016
Flood risk assessment & drainage report received on 26th October 2016
Planning statement received on 26th October 2016
Transport Assessment received on 26th October 2016 and updated on the 8th May 2017

The application, plans and documents submitted by the Applicant can be viewed online at www.midsuffolk.gov.uk via the following link:

<http://planningpages.midsuffolk.gov.uk/online-applications/simpleSearchResults.do;jsessionid=C887C3AA8A7097BDD744785F295B92D6?action=firstPage>

Alternatively, a copy is available to view at the Mid Suffolk and Babergh District Council Offices.

SUMMARY

The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. The scheme is contrary to the adopted Mid Suffolk Core Strategy; however, the Council cannot demonstrate a 5 year supply of housing and the scheme falls to be considered under paragraph 14 of the NPPF where the adverse impacts of the scheme have to be balanced against the benefits of the scheme to demonstrate that it constitutes sustainable development. Officers are recommending a minded approval of this application as it is considered to be sustainable development as the public benefits that the scheme will deliver (contributions towards a new school, pre-school, highway improvements, health provision, affordable housing and library facilities amongst others) are considered to outweigh the negative aspects of the proposal.

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason:

- It is a “Major” application for residential land allocation for 15 or over dwellings.

PART TWO – APPLICATION BACKGROUND

1. This section details history, policies, advice provided, other legalisation and events that forms the background in terms of both material considerations and procedural

background.

History

2. The planning history relevant to the application site is listed below. A detailed assessment of the planning history including any material Planning Appeals will be carried out as needed in Part Three:

There is no recent planning history for this site.

3. The following applications are also considered to be relevant to the consideration of this proposal as they represent the other major applications for residential development in Thurston that are currently with the Council for consideration:

2797/16 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane. The applicant is Hopkins Homes and this proposal is identical to appeal 5010/16.

4942/16 Full planning application for the erection of 64 dwellings on land at Meadow Lane, Thurston. The applicant is Laurence Homes.

4963/16 Outline application for the erection of up to 250 dwellings and associated infrastructure including the provision of up to 2.4ha of land for use by the Thurston Community College and the provision of land for a new primary school on land west of Ixworth Road, Thurston. The applicant is Persimmon Homes.

5010/16 Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road (This case is at appeal for non-determination in the statutory period of 13 weeks for a major application).

5070/16 Outline Planning Permission sought for the erection of up to 200 homes (including 9 self-build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access) on land at Norton Road, Thurston – The applicant is Pigeon Capital Management.

The consideration of the cumulative infrastructure issues that this group of applications present has been explored in a collaborative, but without prejudice, working group including County and District Council Officers with the five respective applicants and their technical advisers. This has enabled a constructive and timetabled analysis of the proposals and their cumulative impact.

Details of Previous Committee / Resolutions

4. None

Details of Member site visit

5. Members visited Thurston on the 13th June to look at this site and the four other residential development schemes that are currently with the Council for consideration.

Details of any Pre Application Advice

6. The applicant engaged with the Council and received pre-application advice on the principle of the development and its acceptability having regards to the fact that the Council does not have a 5 year supply of housing.

PART THREE – ASSESSMENT OF APPLICATION

7. Summary of Consultations

Great Barton Parish Council – Objects to this application on the following grounds:

- The Transport Assessment fails to take into account the committed schemes in Burry St Edmunds, Ixworth and Stanton. These should not be ignored in making this decision.
- The Transport Assessment also ignores other schemes coming forwards in Thurston and how cumulatively these will impact on the locality.
- The TA suggests that alterations to the junction outside the Bunbury Arms on the A143 do not need improving. This is not the case as this junction clearly needs improving.
- Thurston Community College is the catchment secondary school for Great Barton and it is currently at its capacity in terms of pupil numbers. Therefore additional pupils in Thurston will have a negative effect on the residents of Great Barton.
- The boundary of the site is the parish boundary between Great Barton and Thurston and is rural in character and this proposal will change that to a more urban type character.
- The proposal is contrary to the NPPF as there are more negatives associated with it than the positive aspects that it brings and as such it should be refused planning permission.
- This proposal is undermining the plan making process in Thurston.

Thurston Parish Council (which includes the comments of the Thurston Neighbourhood Plan Team)

The Neighbourhood Plans Team has stated that it does not support this proposal for the following reasons:

- This site has been considered by the Neighbourhood Plans Team for consideration as part of the neighbourhood plan and there are a number of issues with it which are

considered to be major.

- Consider that the Neighbourhood Plan should be given some weight in the consideration of this proposal as it has been the subject of public consultation despite not allocating sites or proposing planning policies.
- The speed of the submission of the applications in Thurston and the amount of dwellings proposed between the five undetermined applications and the Granary site will result in Thurston losing its 'village feel' and for it to become 'a small dormitory town'.

Specifically in relation to the Bovis scheme, the Neighbourhood Plans team raise the following points:

- The scheme shows an unimaginative off the shelf design and fails to respond to the fact that it abuts the countryside and existing houses on the other.
- Consider that the inclusion of 2½ and 3 storey dwellings at this point in the village is not in keeping with its character and appearance.
- They consider that there is a need for better screening around this site to enhance it and to provide biodiversity opportunities.
- The scheme does not reflect the character of the surrounding area as its density is too high and the majority of the dwellings are large 4+ bedroom properties and not the 1 and 2 bedroom properties which the local needs survey showed was needed.
- The applicant has commented in his supporting documentation that the proposal will only have a limited impact on the surrounding highway network. This is clearly not going to be the case as the proposal will have a negative impact on junctions such as Fishwick and Pockeridge Corners and on the narrow bridge over the A14. There will also be a negative cumulative impact with the other schemes either approved or coming forwards in Thurston in terms of highway safety.
- There are no proposals to put footways in from the site to the existing footpaths so that the residents can access the local school and shops. This would be an unsafe arrangement.
- There has not been an assessment with this proposal of its impact on the local railway station, particularly in relation to the lack of car parking there.
- Both the primary and the secondary schools in Thurston are at capacity and this infrastructure issue needs to be resolved in planning growth in Thurston in the future.
- They also state that they are concerned about the type of affordable homes proposed and that the cost of these will not be 'affordable' to local people.

Thurston Parish Council has objected to this proposal on the following grounds:

- This proposal is outside the development boundary for Thurston, albeit adjacent to it but it is considered that the scheme would bring forwards dwellings that would be visually, physically and functionally isolated from the facilities and services offered by Thurston.
- This is overdevelopment of the site and it should be limited to 50 dwellings in line with the requirements of the local residents.
- The two storey dwellings that are proposed along the western and southern part of the site is no a feature of the surrounding area and as such, the scheme will fail to complement the character of the existing area. These properties should be replaced by single storey properties which would minimise the impact.
- There are privacy issues in terms of loss of daylight and overlooking between some of the proposed dwellings where they face existing properties.
- The proposal fails to protect the intrinsic character of the surrounding countryside. This is contrary to policy CS5 of the Core Strategy and policy FC1.1 of the Core Strategy Focused Review and policies H13 and H16 of the Mid Suffolk Local Plan.

- The density and mix of the housing as proposed fails to take into account the accommodation needs of the area.
- The proposal is not considered to provide safe access for all as required in paragraph 32 of the NPPF. There are particular concerns with pedestrian and cycle facilities and the ability to integrate the scheme with local public transport.
- The proposed single access point into the site is considered to be unsafe, particularly having regards to the fact that no paths along its edge into Barton Road are proposed.
- The scheme will put additional users onto the public highway which will burden it and cause congestion and safety concerns at places such as Fishwick Corner, Pokeriage Corner, on the narrow bridge crossing Barton Road and Thedwastre Road and at the entry and exist points of the A14 at the junction of Thurston Road, Great Barton and the A143.
- The Thurston Primary Academy and the Thurston Community College are at capacity and as such the local education infrastructure will not be able to cope with this development. This would be contrary to policy CS6 of the Mid Suffolk Core Strategy.

The Parish Council has been consulted on the most recent amended site plan and they confirm that they still object to the scheme on the same grounds as previously raised. However they have clarified that they are now satisfied with the new access visibility splay arrangements as contained in the amended plan.

MSDC - Environmental Health – Contaminated land – Does not object to the scheme on contamination grounds subject to the imposition of planning conditions.

MSDC - Environmental Health – Public Protection – Initially raised concerns about the potential impact in terms of noise of a proposed foul water pumping station within the site on the living conditions of the existing and surrounding residents. The applicant has addressed this issue and the Public Protection Officer has confirmed that she no longer objects to this proposal.

MSDC Heritage Officer – The site lies on agricultural land which is within the setting of Manor Farm which is Grade 2* listed and also Grange Farmhouse.

The Historic Buildings Officer advises that due to the location of the site which when developed will read as an extension to the existing residential part of the village would cause no harm to the setting of the listed buildings referred to above. As such, he has no objections to this proposal.

MSDC - Strategic Housing (Summary) – Advises that no objections are raised to the scheme as submitted as 35% affordable housing is proposed in line with the Council's requirements. The strategic Housing Officer advises that the affordable housing requirement for the site is 48 affordable units. These are broken down as follows:

Affordable Rent Tenancy = 48 units broken down as follows:

Affordable Rent Tenancy = 36 units:

- 10 x 1b 2p flats @ 50sqm
- 2 x 1b 2p bungalows @ 50sqm
- 2 x 2b 4p bungalows @ 70sqm
- 16 x 2b 4p houses @ 79sqm
- 5 x 3b 6p houses @ 102sqm
- 1 x 4b x 7p house @ 115sqm

Shared Ownership = 12 units as follows:

- 8 x 2bed 4p houses @ 79sqm
- 4 x 3bed 6p person houses @ 102sqm

MSDC Sustainability Officer – After the submission of additional information, there are no objections to this proposal on sustainability grounds.

MSDC Tree Officer – Does not object to this proposal. However, he has commented if it is necessary to remove the well-established hedge along the site frontage as he considers that it will soften and integrate the development into the locality.

He also makes the comment that plot 1 is too close to the important Beech Tree T4 and it is important to redesign that part of the scheme so that there isn't a conflict between the tree and the plot. Following an altered layout which has moved plot 1 and its garage outside of the root zone for plot 1, the Tree Officer no longer has any concerns in relation to this proposal.

SCC Archaeology – Does not raise any objections to this scheme as the site is not in an area with any archaeological potential.

SCC Flood and Water management – Has objected to this scheme and asked for additional information to be submitted. The applicant has submitted the information and at the time of reviewing this report no progress had been received in resolving this matter. The committee will be updated at the meeting with the comments of the Flood and Water Management Officer.

The SCC Flood Management Team has been asked to comment on the cumulative impact of 827 houses being proposed in Thurston and they have commented that they would expect all of the developers to design suitable sustainable drainage systems (which they all have). All of the 5 sites are in a flood zone 1 so they comply with national policy requirements. However, surface water drainage has historically been an issue in Thurston with soil conditions not being viable for water to drain away easily. Most of the surface water from the village is drained into the foul sewer system with the east part of the village having a surface water drainage system. It is understood that Anglian Water are considering options to improve capacity in the locality to help to prevent the flood events that have happened in the centre of the village in recent years.

SCC Highways – The Local Highway Authority has provided two responses on this proposal. One deals with the cumulative impact of this scheme and the four others that have all been submitted in Thurston on the local highway infrastructure. The second response deals with the highway issues that are specific to this proposal.

Cumulative impact - The Transport Assessments provided for the individual proposed developments show varying degrees of impact on the highway infrastructure. To date none have shown the cumulative impact of all five developments but at some locations the Local Highway Authority considers this may be severe, particularly where the network is already close to or exceeding capacity. Paragraph 21 of the National Planning Policy Framework (NPPF) states that planning policies should recognise and seek to address potential barriers to investment, including any lack of infrastructure and identify priority areas for infrastructure provision. Both SCC and MSDC are aware that paragraph 32 of the NPPF states that development should only be prevented on transport grounds where residual impacts of development as severe. The same statement allows decisions to be made taking account of

whether improvements can be undertaken within the transport network that cost effectively limits the significant impacts of development.

On this occasion, the Local Highway Authority consider that by taking a co-operative approach for all five developments there is an opportunity that the planning process can provide improvements to both mitigate against any severe impacts and any lack of transport infrastructure.

Highway Infrastructure (Congestion)

The initial data and modelling provided in Transport Assessments indicates that the road network will experience additional traffic through growth and development and at some locations this will exceed the theoretical junction capacity. Those junctions that are or may exceed capacity are discussed below.

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

Modelling shows that this junction is already close to theoretical capacity in the AM peak with northbound traffic waiting to turn onto the A143 queueing on Barton Road and at capacity in the PM peak with Thurston bound traffic waiting right from the A143 into Barton Road. The additional traffic from the proposed developments in Thurston will exacerbate these problems; in particular, modelling shows the queueing traffic on Barton Road will exceed capacity in the AM peak.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

Modelling indicates that the southbound approach to the junction is currently close to capacity in the morning peak and that its capacity will be exceeded before all five developments could be delivered. However, in the PM peak the junction has the capacity for the predicted traffic for all developments.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The modelling of this junction shows some inconsistencies with one study indicating it will be close to capacity southbound on Thedwastre Road in the AM peak due to traffic from one specific development but other modelling showing it would have capacity for the traffic generated by the developments.

Highway Infrastructure (Road Safety)

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

There have been three recorded crashes resulting in slight injuries and one involving serious injury at this junction in the last 5 years for which data is available (2012-2016).

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

There have been two crashes resulting in slight injuries at this junction in the past 5 years.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

At this junction there have been 9 crashes resulting in slight injuries and one resulting in a serious injury in the past 5 years.

The frequency of injury related crashes at the C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner) junction would, in the opinion of SCC, necessitate some work to improve road safety. Although the frequency of crashes at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road does not justify significant road safety improvements it is a factor that should be considered in any future mitigation measures.

Suggested Mitigation Measures

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

An assumption has been made that the junction can be signalised and that this will reduce congestion and improve road safety. Although there is a generous width of highway verge in the vicinity of the junction the geography of the site may place constraints on the design and further work is required to confirm that a solution is possible or beneficial. The proposed junction improvements would be delivered through a jointly funded S106 contribution.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

The issue of congestion on the southbound approach is difficult to mitigate as there is insufficient land within the highway boundary to provide a meaningful solution. It is noted that the road network around Thurston is relatively permeable and an option exists for traffic to avoid this by diverting onto Beyton Road and then turning right to approach this junction from the east.

Several minor traffic management features such as improved signing, marker posts and high friction surfacing have been used at this junction in the past as crash reduction measures. Despite this, crashes causing injury continue to occur. To reduce the severity of these crashes it is proposed to restrict the road to 40mph and undertake local safety improvements such as enhanced road signs and markings. This would be delivered through a jointly funded S106 contribution.

A longer term solution would be to remodel the junction or drastically remodel the road network. It is recommended these matters should be addressed in any future revisions to the Local Plan.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The highway boundary constrains any improvements in this location and thus there does not appear to be any viable mitigation to increase capacity on the southbound Thedwastre Road approach. The relatively low number of crashes suggests that the issue of road safety is not as important as it is for the other two junctions and mitigation measures would only comprise low cost work, such as road signs and markings.

Speed Limits

It is noted that a number of proposed access roads are located close to or beyond the existing 30mph speed limit in Thurston. In some cases, assumptions have been made when determining visibility for these junctions that the 85%ile speed limits are or will be close to 30mph. Developers are advised that the visibility requirements shall be designed for the measured 85%ile speed adjacent to the junction and not the posted or proposed future speed limit. A legal process must be followed to change or extend a speed limit and during this process objections can be made which can delay or stop creation of the necessary legal order. For this reason, Suffolk County Council cannot accept visibility splays based on changes to speed limits unless there is confidence that no significant objections to the traffic regulation order are likely.

Based on the available details of the five proposed developments the following changes to speed limits are suggested;

- Extend the 30mph speed limit north on Ixworth Road to Thurston Rugby Club
- Extend the 30mph speed limit on Norton Road towards and beyond Church Road
- Extend of 30mph speed limit on Barton Road west of Mill Lane
- Create a new 40mph speed limit between and including the C693 Thurston Road / C692 Thurston Road / C693 New Road and the C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road for road safety reasons.

The necessary Traffic Regulation Orders (TRO) could be raised individually or preferably as a single order. The latter is preferred as it reduces cost and administration. This can be delivered through site specific or joint S106 contributions. As stated above implementation of an order cannot be guaranteed and if a TRO is required to justify reduced visibility splay lengths then the order would need to be substantially complete before such a reduction would be accepted. If a process can be agreed between the parties' initial consultation can be undertaken in advance of determination of the planning applications.

Pedestrian and Cycling Infrastructure

The benefit of considering all five applications together is that a coherent system of footways and pedestrian crossings can be delivered in Thurston. The proposed footways are intended to provide good, direct pedestrian access both to the main village and schools. The proposed improvements, most of which have already been proposed by individual applications, are listed below:

- An uncontrolled pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road.
- A footway on west side of Ixworth Road between Norton Road and the entrance to Persimmon's site
- A footway link on Ixworth Road between the entrance to the Persimmon development and the entrance to the Thurston Rugby Club.
- A controlled pedestrian crossing facility (e.g. a raised table junction with zebra crossing) if practicable at or adjacent to the Norton Road / Station Hill / Ixworth Road junction. Pooled contributions from all 5 developments are required for the County Council to deliver this.
- A footway on the north side of Norton Road from Meadow Lane east towards Church Lane as far as the site boundary allows. This could be within the development and or on the highway verge.
- An uncontrolled pedestrian on Norton Road crossing linking the Hopkins Homes and Pigeon sites
- Meadow Lane resurfaced to improve cycle / pedestrian facilities (and maintain access to properties)
- Provide a metalled footway on Church Road between Footpath 006 and the footpath link to School Lane. This will include provision of street lighting along this short section of footpath.
- Provide two uncontrolled pedestrian crossings on Sandpit Lane to link the Hopkins Homes development to the main village

With the exception of the pedestrian crossing facility at the junction of Ixworth Road, Station Hill and Norton Road, the above are expected to be secured by conditions or S106 obligations as appropriate and delivered by the relevant development with S278 (improvements to existing highway) or S38 agreements (if adoption as highway maintainable at public expense is desired) as appropriate. All the footways are expected to be metalled and where verge space allows provision for cyclists should also be considered.

Public Rights of Way (PRoW)

It is proposed that a small number of PRoW are improved to provide alternative pedestrian links between the proposed developments and current and future school sites. These are improvements to:

- Thurston Footpath 001 between Ixworth Road and Meadow Lane. It is proposed that this is to an all-weather standard, preferably a bituminous surface.
- Thurston Footpath 018 between Ixworth Road and Mill Lane. This lies within the development site and the works can be secured by condition.

- Thurston Footpath 006 between Norton Road and Church Road. This lies within the development site and the works can be secured by condition. It is proposed that this is to an all-weather standard; preferably a bituminous surface as far as it is a safe pedestrian route to the site north of Norton Road.
- New PROW link along southern boundary of the Bovis Homes site to join Barton Road
- New PROW link from the site west of Barton Road to Heath Road, linking with Cycle Route 51.
- Improve PROW 007 North of Meadow Lane (un-metalled).

If diversion of a PROW is likely it is recommended that discussions are held with the relevant SCC officer at an early state.

Public Transport

Improvements to public transport infrastructure will be limited to any site-specific works necessary as a result of each development through S106. All other public transport improvements are included in the CIL.

The specific highway comments relating to this scheme only are as follows:

- **Site access** - Visibility splays of 2.4m x 43m are proposed. The access is very close to the northern end of the existing 30mph speed limit and unless evidence is produced by the applicant a speed limit of 37mph should be assumed for design purposes and thus a 43m visibility splay would not be acceptable. He also comments that no swept path analysis has been provided for the entrance or within the site.
- **Highway drainage** – The application shows permeable paving into the public highway which is not considered to be acceptable due to maintenance and replacement costs. The highway authority would also not accept the adoption of soakaways or other drainage features that are not within the proposed limits of the public highway.
- SCC would prefer footway access to the far northern edge of the site to allow connectivity to the wider road and footway network and any footway should be metalled using standard materials and drained to allow all year use.
- **Landscaping** - On the plans supplied it is noted that trees are shown in indicative positions. These are close to and overhanging the highway. Planting of vegetation that will or may in the future overhanging the road would not be permitted. Before that Highway Authority would consider a layout for an adopted road the applicant will need to agree details of such planting including how these would facilitate adequate street lighting and the risk of root damage mitigated.
- **Transport Assessment and Local Highway Infrastructure** - The trip rates are judged to be robust and are accepted.
- **Transport Assessment and Local Highway Infrastructure** - The trip rates are judged to be robust and are accepted.
- Advises that figures showing the development impacts at each junction should be provided.

A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton

- The traffic survey data has not been provided for movements to and from arm D at the A143 / Thurston Road junction. These must be provided to check capacity assessment flows. Without this data it is difficult to see how the conclusions in Table 7.2 were reached.
- Traffic flow diagrams should be provided relate to the individual junction capacity assessments. These were not included in Appendix E in the Transport Assessment on the Mid Suffolk District Council planning portal.

- The modelling outputs have only been provided for the 2016 AM Base only. All scenario outputs should be provided so that assessed flows can be confirmed.
- The on-site enumerator observed that Thurston Road (at the A143 junction) merged into one lane after 15m. This means that there is space for about 2.5 PCUs to queue adjacent to each other (left lane and right lane). It would be useful to support this with evidence with scaled plans or drawings as it appears to be optimistic based on our own observations as does the visibility from Thurston Road, particularly north towards Ixworth. This arm of the junction has been assessed as a two lane approach using the Junction 9 program. Guidance for this software states the following:
- “On the minor road there may be one lane, two lanes, or one lane that widens into two lanes (“one lane plus flare”). If there are two full lanes extending back from the give-way line to beyond the normal maximum queue length, the arm should be modelled as having two lanes. At flared junctions, it is recommended for simplicity to firstly model the arm with two lanes in order to establish whether the normal maximum queue length extends back beyond the end of the flare.”
- It needs to be confirmed that the normal maximum queue length does not extend back beyond the two lanes (2.5 PCU’s as above). If so, the junction should be assessed as one lane plus flare.
- The tight radius for vehicles turning into Thurston Road has not been mentioned. From site observations the verge appears to be regularly over-run. Local anecdotal evidence (from the Parish Council) suggests this is result of use by school busses accessing the local schools.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner) junction.

- The proposed improvements to road safety are broadly accepted although the vehicle activated signs shown in drawing 146/2015/05 Rev P1 would need to be solar powered. A commuted sum would be needed to cover maintenance and final removal. As part of the cumulative impact study it is recommended that the speed limit is also reduced to 40mph.

Proposed S278 works

- Extension of footway along Barton Road along the site frontage. This will be secured by condition as necessary.

Proposed S106 Heads of Terms

- Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £47,975 is required on commencement of work on site
- 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 £8711 is required at the commencement of the first dwelling.
- Contribution towards extension of the 30mph speed limit on Barton Road west of Mill Lane. A contribution of £8000 is required on commencement of construction work on site.
- Contribution towards provision of pedestrian crossing facilities at the junction of Norton Road / Station Hill / Ixworth Road. A contribution of £15,068 is required on occupation of the first dwelling.

- Creation of new Prow along the southern boundary of the site to Heath Road (Cycle route 51). A contribution of £34,000 is required on completion for 50% of the total number of dwellings.
- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum until five years have passed after occupation of the final dwelling. 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
- Travel Plan Implementation Bond - £108,585 (based on SCC calculations on the estimated cost of fully implementing the travel plan for 140 dwellings). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.

The S278 and S106 proposals are based on the assumption of a collaborative approach between all 5 developers. If this site is determined as a stand-alone application these conditions and contributions would be re-assessed.

The applicant has subsequently amended his site plan and has been in negotiations with the Local Highway Authority in relation to the access visibility splays to resolve the issues raised above. The Local Highway Authority has advised that they are now satisfied with the scheme and that the remainder of the matters can be covered by planning conditions and within the S106 agreement for the scheme. The Local Highway Authority has indicated that the cost of this will be £113,754 for the works required under S106 of the act (excluding travel plan costs listed above) and £40,000 for works under section 278 of the Highways Act.

SCC - Obligations Manager: Comments that 138 new houses proposed in the scheme will have an impact on local infrastructure particularly in terms of education.

Primary Provision

The residents of the scheme will generate the need for 29 new primary school places and it has been advised that there is no capacity in the local Primary School which is the Thurston Church of England Primary Academy to accommodate this development and as such a contribution is requested towards a new primary school. As new schools cannot be provided through the Council's CIL scheme (the 123 list only allows for extensions to schools and not new schools) a request is made for a contribution towards a new school under S106 of the planning act.

A contribution for £476,441 as broken down below is required to meet education needs which will arise from this development:

| School level | Minimum pupil yield: | Required: | Cost per place £ (2016/17): |
|----------------------------------|----------------------|-----------|-----------------------------|
| Primary school age range, 5-11*: | 29 | 29 | 16,429 |

Land for new school

A contribution for a further £37,526 is also requested to contribute towards the cost of the land to provide the school. This is worked out on a maximum cost of £100,000 per acre (£247,100 per hectare, which will be £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 places x £1,294 per place = **£37,526**

Temporary classroom

The Obligations Manager has also advised that there will be a need for temporary classroom arrangements to accommodate the needs of the children that arise from this development. The existing primary school is on a very constrained site and an extension to the facility is not possible under Department for Education guidelines. However, it is advised that where extra pupils either through a spike in local population or from housing development cause a 'bulge' in the admission numbers, this can be accommodated by providing temporary classrooms.

A double temporary mobile classroom providing 60 places could be located within the hard surfaced play and car park areas within the school for a period of no longer than 3 years to meet the admissions 'bulge' which would be caused by this and other large housing developments in Thurston. As the primary school is an academy whereby the County Council has limited control over its operation, agreement to the provision of the temporary building has had to be sought from the Academy board that runs the school and it is understood from the Obligations Manager, that agreement has now been given by them for this to go ahead.

The temporary classroom will be facilitated via a CIL bid as it is classified as being an extension to an existing school in the Council's 123 list.

Secondary School and 6th form provision

The Obligations Manager has commented that secondary and 6th form provision in the area is currently sufficient to accommodate the additional pupils which will be generated from this proposal as shown in the table below.

Total primary education contributions: £513,967

Restriction on occupation

The Obligations Manager has also commented that as there are two residential sites in Thurston proposing a primary school site (application 5070/16 – Land on land at Norton Road, Thurston for Pigeon Capital and 4963/16 – Land west of Ixworth Road – Persimmon Homes) but neither application is approved yet, that the district council should consider imposing a planning condition restricting occupation of any dwellings once the capacity of the existing primary school with additional temporary classroom are full. This condition could then be discharged once the construction of the new primary school on whichever site has been chosen has commenced.

Pre-school

The Obligations Manager has also noted that there are currently 4 pre-school establishments in the locality (2 childminders, Thurston pre-school and Tinkerbells Day Nursery) and that spare capacity between them is only 10 spaces. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

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

- £500,000 construction cost (including land as collocated with the new primary school) for a new 60 place setting
- £500,000/60 early years pupils = £8,333 per place From 137 dwellings there is the need for 14 additional places
- Therefore 14 pupils x £8,333 per place = **£116,662 (2016/17 costs)**

Total contribution for all education provision - £630,629

Other infrastructure contributions

Requests a contribution of £29,808 towards library provision. This is requested under the Council's CIL 123 list.

SCC Public Rights of Way – Does not raise any objections to this proposal.

Anglian Water – They have not objected to this proposal. They confirm that there is capacity in the catchment of the Thurston Water Recycling centre for wastewater treatment. They have not objected to this scheme on foul sewage capacity but have requested a condition is imposed if planning permission is granted for this scheme requiring details of the pumped rate of water that will be discharged from the site to the foul sewage network. Anglian Water advises that they do not wish to provide any comments in relation to the surface water drainage for the site.

Ecology Officer, Essex Place Services – Advises that the site contains priority habitat in the form of hedgerow and it is likely to support priority species such as Bats, Amphibians, Reptiles, Hare, Skylark and potentially Hedgehogs. The Ecology Officer agrees with the recommendations of the applicant's ecology reports and requests that conditions be imposed requiring the scheme to be completed in accordance with the recommendations of the report and that detail of lighting within the site is provided to the Council to ensure that the impact on ecology is minimised. The Ecologist notes that there will be an adverse impact on Skylarks if this site is developed and requests that a scheme is secured via a S106 agreement to provide off site mitigation. This will be in the form of nesting plots on land away from the application site.

Environment Agency – Does not object to this scheme on flood risk or on foul water grounds.

They have also considered the cumulative impact of all 5 schemes together and they advise that none of the sites are in an area at risk of fluvial flooding. They also confirm that from their records there will be sufficient capacity in the Thurston Water Recycling Centre to accommodate all 827 dwellings. They have advised that Thurston lies in an area of 'water supply stress' by Anglian Water which has a duty under their own legislation to provide a water supply to new houses when they are built.

Fire Service - County Fire Officer – They do not object to this proposal subject to the imposition of a condition relating to the provision of fire hydrants on site.

Highways England: Does not raise any objection in relation to this proposal.

Historic England – They have advised that there was no need for the Council to consult with them on this application.

Landscape Consultant – Essex Place Services: Comments that the proposal will have an impact on the existing rural edge character of Thurston.

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. In this situation, it was advised that a Landscape Visual Appraisal was required to assess and address this issue.

The applicant has subsequently submitted an LVIA and the Landscape Consultant is now satisfied with its contents and the mitigation measures proposed by the applicant. The Consultant has advised that there is a need for more information in terms of the landscaping scheme within the site and this can be achieved via the imposition of a landscaping condition.

Natural England – They do not have any comments to make on this proposal.

Network Rail – They have been consulted on the cumulative impact of building 827 new dwellings in Thurston on the railway station and the local railway network as requested by the local community. They state that the main issue is the Barrow Level Crossing at Thurston station which has historically seen a number of safety issues associated with it and the level of usage which would arise from the erection of the number of dwellings proposed would have a severe impact on safety unless mitigation measures are introduced. They indicate that their preferred option is to close the level crossing and replace it with a new pedestrian ramp from platform 1 (upside) down the embankment leading onto Beyton Road. This design will also need to include a drop off point/layby for vehicles along Beyton Road. They have advised that the cost of the works amount to £1million and should be shared proportionally amongst the developers. They are seeking this through a S106 agreement.

When questioned, Network Rail has made it clear that the works that they propose to the crossing point at Thurston Station are directly related to the impact of the 5 planning applications and the 827 houses that would be built. They have advised that the other works that they propose to close crossing points elsewhere on the same line are minor in nature and cannot be compared to this site as the other crossing points are not facing unprecedented levels of pedestrian use which would be generated from the proposed housing in Thurston.

NHS/Primary Care Trust – The proposal will have an impact on the Mount Farm Surgery and there will be a need to either extend or reconfigure the building to meet the additional capacity requirements that will be generated if this proposal is approved. The PCT have not specified an amount that they require, but they have confirmed that they will be making a bid under the Council's CIL scheme for the funding that they require to carry out the works they deem necessary to ensure that the facilities can meet the need that arises from this development.

Ramblers Association – Does not object to this proposal as there are no public footpaths either within or adjacent to this site.

St Edmundsbury Borough Council – Does not wish to make any comments on this proposal.

Suffolk Wildlife Trust – Raise the following points:

- The hedgerow along Barton Road is species rich and the plans show this as being removed. It should be retained as a suitable buffer and also for biodiversity reasons.
- There are bats on site and it is recommended that a condition is imposed on any planning permission requiring the developer to provide a lighting strategy which will minimise impact on the protected species on site.
- The applicant's ecology report highlights that the site offers potential nesting for Skylarks, brown hares and hedgehogs and mitigation is required for the loss of the habitat in the application site.
- If approved, there needs to be a condition on the planning permission to ensure that the scheme is developed in accordance with the recommendations of the ecological report.
- The scheme should also provide environmental/ecological enhancements.

Representations

8. 34 letters in total (one of these having been written by a planning consultant on behalf of 14 local residents who have signed it) have been received objecting to this proposal on the following grounds:

Highway safety

- Barton Road needs to be altered to allow traffic to flow better, especially at its junction with Mill Lane.
- Barton Road is not wide enough for this development and it can be seen on site that vehicles regularly take to the verge to pass each other which is unsafe. This will only get worse with further dwellings on site.
- The proposed entrance into the site is only just within the 30mph speed limit and as such, vehicles will be approaching it at 60mph. This will not be safe.
- There is traffic congestion along Barton Road at certain parts of the day and this causes safety issues. The applicant's transport consultant considers this to be a traffic calming situation, but disagree with this strongly.
- The local roads are inadequate and dangerous to cope with so many new dwellings and they are always in a poor state of repair which will be made worse by this proposal.
- There are a number of dangerous junctions and pinch points in the area which will become more dangerous with the number of vehicles which will be generated by this development.
- There are congestion and safety concerns with the junction near the Bunbury Arms and the A143 and additional houses will make that worse.
- There are no footways to and from the site and as such this will make the scheme highly dangerous.
- Thurston faces traffic congestion from people going to work and coming home. This will make matters worse.
- The applicant's trip generation figures aren't accurate and there are more vehicles using the local roads than suggested.
- Barton Road needs a speed camera to resolve the constant speeding that happens along there.
- Not convinced that there is sufficient width on Barton Road to provide a footway. Either the road will have to be narrowed which would cause more issues, or the hedgerow which is species rich will have to be removed which harms biodiversity.

- The local bus service is poor and terminates early in the evenings.
- The railway station has poor parking. Additional residents from this site using the railway station will increase the parking issues experienced.

Infrastructure

- This proposal will have a negative impact on water pressure in the locality.
- The infrastructure for this proposal is limited and as such it should be refused planning permission.
- The applicant is not proposing to do anything in this application to improve infrastructure in the locality.
- This development will create excessive pressure on the local GP surgery as well as other NHS infrastructure in this part of Suffolk.
- Public transport is inadequate in this part of Suffolk to allow sustainable travel methods to take place.
- As the local infrastructure cannot be improved before this scheme is built, then it should be considered to be premature and it should be refused permission.
- Neither the local primary or secondary school can accommodate the children from this development as they are at capacity especially when you consider that the children from the Granary site will be using the local schools also.
- This application has only been submitted as the Council does not have an up to date development plan. Bovis should have waited until one was in place before submitting.

Impact on the character and amenity of the area

- The proposal will result in urban sprawl into the surrounding open countryside.
- The proposal does not respect the style or the density of any of the neighbouring properties. It is an urban style scheme in a village environment and totally out of keeping.
- The applicant's landscaping scheme lacks detail. They need to provide more information before this application is approved, or via a planning condition if that is suitable.
- It is very surprising that no landscape assessment report has been submitted with this application.
- The house types do not reflect the local vernacular. The applicant is proposing the same dwelling type in a scheme in Yorkshire. Clearly, Suffolk and Yorkshire are not alike in terms of housing types and styles.

Impact on residential amenity

- Would like to see single storey dwellings backing onto Roman Way as these would be less intrusive in terms of their impact on the living conditions of the surrounding residents in terms of loss of daylight and sunlight.
- There needs to be a fence erected between the proposed properties and those on Roman Way to protect the privacy of the occupiers of both sets of properties. As submitted, the plans do not show anything.
- Street lighting from this proposal will be invasive and will have a negative impact on the surrounding locality and also on the amenities of existing local residents.
- The dwellings will be too close to existing properties. There is a separation of only 25m between the proposed and existing properties. It should be 25m from dwelling to boundary and another 25m to the new dwellings and not as suggested by the applicant.
- There are too many 2 storey properties along the boundary and not the 1 storey

- properties that the applicant assured the local residents there would be.
- The dwelling and garage to plot 54 will have a negative impact on the enjoyment of the garden of the property, 19 Heather Close. It should be moved further away.
 - The use of trees to provide privacy between properties is not a good idea as they may not grow and they may not be maintained if they do.
 - The trees between the garden boundaries should be maintained by the developer even after the dwellings have been occupied to make sure that they provide the screening that was envisaged.
 - It is proposed that trees are to be planted to the rear of plots 50, 51, 52 and 53, but this would be on top of a sewage pipe and as such, that will never happen and they cannot provide the screening that is needed between the dwellings and the existing surrounding properties.
 - No details of street lights have been provided for this scheme. This needs consideration as if done wrongly; it could create an urban type environment and not a rural one as is the case at present.
 - If this scheme is approved, consideration needs to be given to remove the permitted development rights of the plots that face directly towards the existing dwellings that surround them.
 - There is only a hedge between plot 32 and the objector's property and there is concern that this would not be sufficient to maintain security between the properties.

Impact on wildlife/trees in the locality

- The dense greenery in this site is misleading as the trees are deciduous and do not form a screen. They will also cause problems with shading and also leaf fall onto the new properties.
- The trees will encroach into the root zone of many of the trees and cause harm to them. These dwellings need to be removed from this proposal.
- The proposal does not have an environmental role as it will harm all of the wildlife that lives within the application site.
- There are bats in the locality and additional lighting from the dwellings will impact on their habitats.
- The applicant's ecology report is completely inadequate as there are a number of species in the locality which will be affected by this proposal.
- The application is misleading as it says that the hedge along the access point will only be partly removed in one report, but another says it will be completely removed. Which is correct?
- There are trees in the gardens of some of the surrounding existing properties. It is hoped that these will not be destroyed as part of the build process for this scheme.

Flood risk

- Drainage is an issue in the locality. The development can only make matters worse.

Policy issues

- Whilst Thurston is one of 13 Key Service Centres in the Council's development plan, it should not bear the brunt of the majority of housing for the district.
- The development is outside the settlement limits for Thurston and as such it cannot be considered to be sustainable.

- This proposal ignores the 50 limit per housing site as suggested by the Parish Council in their neighbourhood plan.
- The Neighbourhood Plan is at an advanced stage and not at an early stage as suggested by the applicant.
- Question if the affordable homes proposed are truly affordable?
- This proposal is not sustainable and the objector can't see how it could ever be improved to make it sustainable.
- Planning permission was refused for a similar scheme to this on this site in 1989 on the grounds that it was outside the village envelope.
- This proposal should not go ahead until the new Neighbourhood plan is issued.
- Policy FC2 of the Mid Suffolk Core Strategy allocates 200 dwellings (100 on Greenfield and a further 100 on brownfield) for the next 5 years. There is therefore no need to permit more dwellings in the Key Service Centres which would lead to those figures being exceeded.
- Why didn't Bovis promote this site via the Neighbourhood Plan process?
- This proposal has more negatives associated with it than positives and as such, when weighing up the scheme as required by the NPPF, it is considered that it should be refused planning permission as it does not constitute sustainable development.
- There are 19 other sites which have been suggested in the neighbourhood plan consultation exercise and these sites are all better than this one. Furthermore, the applicant submitted this scheme just before the Parish announced the schemes they were putting forwards which is unacceptable.
- The Council will be forced to approve this scheme due to unsatisfactory national policy.

Ecology

- There are Great Crested Newts in the ponds of 19 Heather Close and other gardens in the vicinity and this site is adjacent to the application site. Therefore, there must be newts also in the application site which will be harmed by this development.
- The hedgerow within the site will also provide habitat for other ecology and this scheme will result in the hedgerow being removed which will impact on this habitat.
- Where the hedgerows don't currently exist, or where there are gaps in them, they should be planted to improve the ecological value of the site.
- The applicant states that hedgerow H4 is poor. Disagree with this as it is full of species so it must be species rich and worthy of retention.
- The scheme will impact on Skylarks in the locality.
- The applicant states in his application that there are no protected or priority species on site. This is clearly wrong as species have been observed on site.

Other issues

- Would like the applicant to put on the house deeds that the trees proposed along the site boundary cannot be removed. Or if this is not possible, then it should be via a section 106 agreement.
- There are not enough bungalows as part of this scheme and there is a need for more 2/3 bedroom properties as part of this scheme rather than the large 4/5 bedroom properties as proposed.
- There is nothing in the application about fixing the fence which always breaks between the site and Marley Close.

- This field is agricultural land and it will be lost forever if this scheme is approved and built.
- This proposal will make Thurston a town and not the current village that it is.
- The proposal will impact on property prices in the locality as a number of local properties have gone on the market since this application was submitted.

Cumulative Impacts

- The 5 sites in Thurston should be considered cumulatively and not singularly due to their linked impacts and they should also be considered having regards to the Granary site which already has permission.
- There are too many houses proposed particularly when you take into account all of those in Bury St Edmunds which is only a short distance away from Thurston.

A further letter of objection has been received since local residents have been notified of the date of the Referrals Committee. The objector has raised the same comments as summarised above with the addition concern that the scheme will increase the likelihood and fear of crime in the locality.

The Site and Surroundings

9. The application site lies in the village of Thurston which has a population of approximately 3200 people (2011 census) with the site being a parcel of grade 3a agricultural land which is 5.26 hectares in area. The field lies in the north western corner of Thurston and is relatively flat with just a gentle slope towards the northern corner of the site. Residential development exists to the south of the site and partly to the west (Furze Close and Heather Close) and to the east in the form of dwellings that back onto Barton Road and also include Marley Close. To the north is open agricultural countryside.
10. The field is currently in agricultural use with a hedge along most of its boundary with Barton Road and also as a boundary between the site and the field to the north of the site. The western boundary towards the properties on Heather Close is formed by a mixture of hedging and domestic garden fencing as well as sporadic tree cover as is the boundary to the properties on Furze Close. The development known as Marley Close which lies in the south eastern corner of the site is surrounded on its western and northern elevation by a number of established trees which are with an existing wooden garden fence which forms the domestic boundary of this site with the adjacent field.
11. Barton Road is mainly characterised by single storey bungalow type development in relatively spacious plots, although there are examples of two storey properties in this location. Furze Close and the residential street that travel from it to the edge of the application site is also characterised by bungalows. There is a mixture of smaller single storey bungalows in relatively small plots and the taller dormer style bungalows with their high steeply pitched roofs within larger plots and also bungalows which have been substantially extended over the years and appear dominant in the street scene. This pattern of development is also repeated on Heather Close which borders the site to the west.

The Proposal

12. Please note details of the proposed development including plans and application documents can be found online.

13. The applicant is proposed a full planning application for the erection of 138 dwellings on the application site. Access to the site is from Barton Road opposite the last property on Barton Road before the speed limit rises from 30mph to the national speed limit. The site is laid out with an estate road running through from the access point along the centre of the site with various spine roads coming from it. To the south of the site, the estate road loops around so that it connects with the main spine road in two locations. The estate road is a mixture of adoptable highway and private driveways. The site layout plan shows a central green area within the site which will be lined by trees and an open space area with a water feature in it adjacent to the boundary of the site with Barton Road.
14. The proposed layout for the site shows a mixture of 4 and 5 bedroom properties along the northern boundary of the site which is separated from the adjacent field by their access road and a green landscaped area before the boundary of the site is reached. This gives a density of 26 dwellings to the hectare.
15. The properties on the western boundary of the site facing the dwellings on Heather Close and Furze Close are a mixture of bungalows and the smaller 3 bedroom two storey dwellings. These are separated from the existing dwellings to their west by a distance of greater than 20m.
16. The properties on the southern boundary of the site are again a mixture of bungalows and the smaller 3 and 4 storey properties within the site. The dwellings directly to the west of Marley Close are a mixture of 3, 4 and 5 bedroom two storey dwellings with the ones to the north of the Close being a mixture of 2, 3 and 4 bedroom 2 storey properties, but these face side on (west/east) rather than facing Marley Close (north/south). The remainder of the site is a mixture of 2, 3, 4 and 5 bedroom two storey houses with two blocks of apartments with 18 separate residences within them. The apartment blocks are the tallest properties on site and are a mixture of 2 and 3 storey projections to create space internally.
17. The applicant comments in his design and access statement that the properties are of a design and style that reflects the surrounding locality as does the palate of materials chosen, which includes plain mortar, coloured render, orange/red and occasionally buff bricks. They also comment that the roofing style and the roofing materials of the proposed dwellings also match the local vernacular.

NATIONAL PLANNING POLICY FRAMEWORK

18. The National Planning Policy Framework (NPPF) contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.
19. The following parts of the NPPF are considered to be applicable to this scheme:
 - Para 6: Achieving sustainable development
 - Para 7: Three dimensions to sustainable development
 - Para 11 – 15: The presumption in favour of sustainable development
 - Para 17: Core planning principles
 - Paras 32 and 34: Transport movements

Para 47: Delivering a wide choice of high quality homes (including the need to have a 5 year deliverable supply of housing)

Para 49: All housing proposals should be considered in the context of the presumption in favour of sustainable development.

Paragraph 55: To promote sustainable development in rural areas.

Paras 56 & 60: Requiring good design

Para 64: Development of poor design must not be supported.

Para 69: Promoting healthy communities

Para 70: Delivery of social, recreational and cultural facilities that the community needs.

Para 72: Provision of school places.

Para 73: Access to high quality open space.

Para 75: Protection and enhancement of public rights of way.

Para 100: Development and flood risk

Para 103: Development and increasing flood risk elsewhere

Para 109: Planning system should contribute to and enhance the natural and local environment.

Paras 112 & 117–119: Development affecting protected wildlife

Para 123: Planning and noise.

Para 125: Planning and darker skies.

Paras 128 & 129: Describing the significance of a designated heritage asset.

Para 131: Determining planning applications that affect heritage assets.

Para 132: Significance of heritage assets.

Para 134: Development and less than substantial harm

Para 186: Approaching decision taking in a positive way.

Para 187: Local Planning Authorities should find solutions rather than problems in decision taking.

Para 196: Plan led planning system.

Para 197: Assessing and determining application applying the presumption in favour of sustainable development.

Paras 203 -206 – Planning conditions and obligations.

Paras 211 - 212: Using development plans and the NPPF in decision making.

Paras 214 – 215: The weight attached to development plan policies having regards to their consistency with the NPPF.

Para 216 – Weight given to policies in emerging plans

CORE STRATEGY

20. Core Strategy Focused Review

FC1 – Presumption in favour of sustainable development.
 FC1.1 – Mid Suffolk’s approach to delivering sustainable development
 FC2 – Provision and distribution of housing.

21. Core Strategy

CS1 – Settlement hierarchy
 CS2 – Development in the countryside & countryside villages
 CS4 – Adapting to climate change.
 CS5 – Mid Suffolk’s environment
 CS6 – Services and infrastructure
 CS9 – Density and mix

NEIGHBOURHOOD PLAN / SUPPLEMENTARY PLANNING DOCUMENTS /AREA ACTION PLAN

22. In 2013 Thurston received a neighbourhood plan designation and the settlement is currently working on its new neighbourhood plan. The plan is however at an early stage and as yet does not have any policies which could be used in the assessment and consideration of this proposal

SAVED POLICIES IN THE LOCAL PLAN

- GP1 – Design and layout of new developments
- HB1 – Protection of historic buildings
- HB13 – Protecting ancient monuments
- HB14 – Ensuring that Archaeological remains are not destroyed
- H3 – Housing developments in villages
- H13 – Design and layout of development
- H15 – Development to reflect local characteristics.
- H16 – Protecting existing residential amenity
- H17 – Keeping new development away from pollution
- CL8 – Protecting wildlife
- CL11 – Retaining high quality agricultural land
- T9 – Parking standards
- T10 – Highway consideration in developments
- RT4 – Amenity open space and play areas within residential development
- RT12 – Footpaths and bridleways
- SB3 – Retaining visually import landscapes (with the land to the south of this site between it and the college being designated)

Main Considerations

23. From an assessment of relevant planning policy and guidance, representations received, the planning designations and other material issues the main planning considerations considered relevant to this case are set out including the reason/s for the decision, any alternative options considered and rejected. Where a decision is taken under a specific express authorisation, the names of any Member of the Council or local government body who has declared a conflict of interest are recorded.
24. The following are identified as the main considerations in assessing this application:

The Principle Of Development

25. The National Planning Policy Framework (NPPF) requires Councils to identify and update, on an annual basis, a supply of specific deliverable sites sufficient to provide for five years' worth of housing provision against identified requirements (paragraph 47). For sites to be considered deliverable they have to be available, suitable, achievable and viable.
26. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites (as stated in paragraph 49 of the NPPF). Where policies cannot be considered up-to-date, the NPPF (paragraph 14) cites the presumption in favour of sustainable development and states that planning permission should be granted unless i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or ii) specific policies in the NPPF indicate development should be restricted. The presumption in paragraph 14 also applies where a proposal is in accordance with the

development plan, where it should be granted without delay (unless material considerations indicate otherwise).

27. The precise meaning of 'relevant policies for the supply of housing' has been the subject of much case law, with inconsistent results. However last month, the Supreme Court gave judgment in a case involving Suffolk Coastal District Council which has clarified the position. The Supreme Court overruled earlier decisions of the High Court and the Court of appeal in this and other cases, ruling that a "narrow" interpretation of this expression is correct; i.e.it means policies identifying the numbers and location of housing, rather than the "wider" definition which adds policies which have the indirect effect of inhibiting the supply of housing, for example, countryside protection policies. However, the Supreme Court made it clear that the argument over the meaning of this expression is not the real issue. The absence of a five year housing land supply triggers the application of paragraph 14 of the NPPF. In applying the 'tilted balance' required by this paragraph, the Council must decide what weight to attach to all of the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies.
28. In accordance with National Planning Policy Guidance paragraph 030 (Reference ID: 3-030-20140306) the starting point for calculating the 5 year land supply should be the housing requirement figures in up-to-date adopted Local Plans. It goes on to state that '*...considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light....Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints...*'
29. The Council published the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA) in May 2017 which is significant new evidence for the emerging Babergh and Mid Suffolk Joint Local Plan. Therefore, the 5 year land supply has been calculated for both the adopted Core Strategy based figures and the new SHMA based figures. For determining relevant planning applications, it will be for the decision taker to consider appropriate weight to be given to these assessments and the relevant policies of the development plan.
30. A summary of the MSDC 5 year land supply position is:
 - Core Strategy based supply for 2017 to 2022 = 3.9 years
 - SHMA based supply for 2017 to 2022 = 3.9 years
31. The NPPF requires that development be sustainable, and paragraph 6 of the NPPF sets out guidance on what this means in practice by drawing attention to all of the policies from paragraph 18 to 219 of the NPPF. In some circumstances there is also a presumption in favour of sustainable development which is to be applied as set out in paragraph 14 of the NPPF. This has been discussed above.
32. Paragraph 7 of the NPPF sets out three dimensions for sustainable development, economic, social and environmental:

"an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right

places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure:

a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."

33. In light of all of the above, this report will consider the proposal against the policies of the development plan to determine if the development is in accordance with the development plan as a whole. If it is not, and there are policy conflicts, they will need to be weighed against other material considerations to see whether a decision which does not accord with the development plan is warranted, in the light of the presumption in favour of sustainable development, and in the context of the authority not being able to demonstrate a 5 year land supply.

Sustainability of the Proposal (including assessment against the development plan and the NPPF)

34. The NPPF also provides (para 187) that *“Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area.”*
35. The Parish Council and some of the objectors have commented that this scheme should be refused as this proposal is outside and does not even abut the development limits for Thurston, in line with the policies contained in the adopted Core Strategy and Local Plan. Further, comments also suggest that housing numbers should be limited in Thurston. However, it is clear on reviewing the guidance in the NPPF that, as the Council does not have a five year supply of housing land, the housing delivery policies CS1 and CS2 of the core strategy, along with policy H7 of the Local Plan, should not be considered to be up-to-date. In this respect, refusing the application solely on the basis of the development being outside the development limits of Thurston, or seeking to cap the development that can be considered, would not sit comfortably with the requirements of the NPPF that look to consider the sustainability of the development in relation to the environmental, social and economic strands of sustainability. Furthermore, as the Council has a deficit of housing completions with the result that it is significantly short of reaching its 5 year supply target, a limit on new housing in any part of the district cannot be given until the deficit in completions is made up to the 5 year level. This is why the housing figures in policy FC2 of the Mid Suffolk Core Strategy is considered to be out of date and cannot be used to limit housing as suggested we do by an objector.
36. In reaching a decision, paragraph 47 of the NPPF is a material consideration and requires Local Planning Authorities to boost significantly the supply of housing, by identifying and updating annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements, with an additional buffer of 5% to ensure choice and competition in the market for land. As stated above, the Council cannot demonstrate a 5 year supply of housing and as

such paragraph 49 of the NPPF applies and states that in this situation, the relevant policies for the supply of housing in the Council's adopted plan should not be considered to be up to date and that the scheme remains to be considered under the requirements of paragraphs 7 and 14 of the NPPF which defines what sustainable development is and how decisions should be made.

37. The contents of paragraph 55 of the NPPF are also considered to be material in the making of a decision on this case. Objections have been received stating that this proposal should not be allowed as it is outside the settlement limit for Thurston and that the site should be considered as countryside. Paragraph 55 of the NPPF makes it clear that Councils can no longer consider sites that are adjacent or near to a settlement limit to be unacceptable simply because they are the wrong side of a line. It now makes it clear that 'new isolated homes in the countryside will not be supported and that Councils are encouraged to promote sustainable development in rural areas by considering housing development in locations where they could enhance or maintain the vitality of rural communities. It gives an example in paragraph 55 that new housing could provide increased facilities in one settlement which would be of benefit to it and the other surrounding settlements.
38. Having regards to the above, it is considered that the application site is not in an isolated location as it is adjacent to the built up part of the village with dwellings to its west, south and east elevations, and the scheme will bring with it contributions which will be of benefit to the residents of Thurston and the surrounding villages. Therefore, in terms of paragraph 55 of the NPPF, this proposal could be considered to promote sustainable development in a rural area. However, having regards to the fact that the Council does not have a 5 year supply of housing and has to balance the negatives of the scheme against the positives that it brings in line with the requirements of the NPPF, consideration of whether the scheme will be supported as sustainable development will be given in the conclusion to this report.
39. An objector has commented that this scheme should be refused planning permission as a similar scheme on the same parcel of land was refused at appeal in 1989 and this has set a precedent. This decision cannot now be considered to set a precedent as national planning policy has changes significantly since 1989 and also subsequent governments have made it clear that there is a housing crisis and more new dwellings are needed to meet population needs.
40. Since the submission of this application, four other developers have also submitted application for residential development in Thurston. Laurence Homes have applied for 64 dwellings on land at Meadow Lane (4942/16); Hopkins Homes have applied for 175 dwellings (2797/16 and an identical proposal under reference number 5010/16 which they have appealed for non-determination); Persimmon has applied for up to 250 dwellings and land for a new school on land off Ixworth Road (4963/16) and Pigeon Capital for up to 200 homes and also a new primary school (5070/16). Including this application, 827 new homes are currently proposed in Thurston. There are also a further 92 dwellings which have planning permission at the Granary where works are commencing on site at present. Following receipt of these applications an approach of joint working to explore cumulative infrastructure issues has been agreed between the respective applicants and the District and County Council. This has enabled the constructive exploration of significant infrastructure issues on a collaborative but without prejudice basis to a consensual timetable.
41. As a consequence of the above, objections have been received on the basis that the Council has 13 Key Service Centres within the district and why should Thurston bear the brunt of all of the new housing. Thurston and Elmswell are two of the largest

villages in the district and due to their location adjacent to the A14 and their accessibility to Bury St Edmunds, Ipswich and further afield it was always likely that they will be desirable for development and experience greater levels of growth, which is witnessed by the unprecedented level of housing currently proposed.

42. Therefore, as there are unprecedented numbers of new dwellings proposed it is considered that all schemes must be considered both on their own merits and in combination with each other to assess if they meet the tests for sustainable development as outlined in the NPPF. The assessment of whether this proposal is considered to constitute sustainable development is given in the conclusion.
43. Policy FC1 of the Mid Suffolk District Core Strategy Focused Review states that it takes a positive approach to sustainable development and like in the NPPF, the Council will work proactively with developers to resolve issues that improve the economic, social and environmental conditions in the area. Related policy FC1.1 makes it clear that for development to be considered sustainable it must be demonstrated against the principles of sustainable development. The policy goes on to say that proposals for development must conserve and enhance the local character of the different parts of the district and how it addresses the key issues of the district.
44. The settlement of Thurston is one of the two largest villages in the district of Mid Suffolk (with the other being nearby Elmswell) where a wide range of local services and local infrastructure is provided. Thurston has both a primary and a secondary school, and a number of other local facilities which act as a service to the inhabitants of the village as well as providing employment opportunities to the wider area. Whilst Thurston does not have a doctor's surgery, there is one in Woolpit and another in Moreton Hall which is a reasonably short journey away either by car or via public transport.
45. Thurston is also unusual in that it has a railway station which provides access for the residents to be able to commute to Ipswich, Bury St Edmunds and further afield without having to use their cars. Thurston is also on the Mendlesham to Bury St Edmunds bus route with a number of designated stops within the village. Comments have been received that this service is poor and that it terminated early. However, it is considered with the potential for an additional 827 dwellings in Thurston by virtue of the 5 applications that the profitability of running the service may increase due to increased demand from the new residents.
46. In relation to paragraph 7 of the NPPF, the proposals would contribute to building a strong, responsive and competitive economy through the creation of construction and related jobs and the on-going contribution to the local economy from the creation of 138 additional households in the area. The proposals would also contribute towards providing the supply of housing required to meet the needs of present and future generations and by having the potential to create a high quality built environment, as well as contributions towards affordable housing, the highway network and other social infrastructure (public open space, education, health care) through a CIL contribution, or where appropriate, a section 106 agreement.
47. It must also be remembered that paragraph 49 of the NPPF makes it clear that housing applications should be considered in the context of sustainable development. The applicant is proposing up to 138 dwellings in this instance and they have confirmed that it is their intention if they get planning permission to commence with work on site as soon as possible. To speed this up, they have agreed to have a shorter period than is usual to commence with works on site (2

rather than 3 years) which helps to justify that as a developer, they are serious about delivering the houses. They have also signed an agreement with Mid Suffolk and Suffolk County Council to work as a group with the other 4 other developers in Thurston to contribute to and work together to achieve the necessary infrastructure within the area to make this and the other 4 schemes sustainable.

48. Consideration of whether this proposal is considered to constitute sustainable development, having regard to the contents of policies FC1 and FC1.2 of the Adopted Core Strategy Focused Review and the contents of the NPPF will be reached in the conclusion to this report.

Site Access, Parking And Highway Safety Considerations

49. Policy T10 of the Mid Suffolk District Local Plan provides criteria on highway considerations when assessing planning applications. This policy requires access points into and out of the site to be safe and an assessment made as to whether the existing local roads can suitably accommodate the impact of the proposal, whether adequate parking and turning spaces exist within the site and that the needs of pedestrians and cyclists have been met. This policy is considered to carry significant weight in the determination of this application as it is in compliance with paragraph 32 of the NPPF which requires all schemes to provide safe access for all.
50. A number of objections have been received to the scheme on the grounds that Barton Road is not wide enough to accommodate the access into the site and that the junction itself will be unsafe as it is near to the 30mph sign on the entrance into the village and vehicles will be approaching it at a faster speed than this. Concerns have also been raised that the applicant's traffic data is unrealistic and that it is in close proximity to a number of pinch points in the local highway network which will cause safety issues as well as increasing congestion at peak times. Mention has specifically been made that some local junctions are unsafe at present (see County Highway Officer's consultation response for details), particularly those adjacent to the railway bridge to the south of the village and that this scheme will exacerbate this problem as more vehicles will be using these junctions to access local roads, particularly the A14 to reach other destinations such as Bury St Edmunds and further afield. Comments have also been received that this scheme cumulatively with the other 4 schemes that have been submitted in Thurston for residential development will cause a significant and severe impact on the road network in the locality both in terms of congestion and safety.
51. The site is located to the north west of the village with the sole access to it being from Barton Road which lies to the east of the site. Proposed is a single access point which is proposed towards the northern part of the site from Barton Road with a network of internal estate roads leading off from that.
52. The Local Highway Authority initially objected to the scheme as the concerns of the objectors and the Parish Council over the safety of the access point, in particular the visibility splay that had been provided was shared. Following discussions, the applicant has amended the extent of the visibility splay and the Local Highway Authority is now satisfied that the access point into the site can be made safe and they have withdrawn their objection to the scheme. The Local Highway Authority has not raised any issues with the internal layout of the site as proposed and specific matters in relation to the above can be controlled by planning conditions. They have also accepted the applicant's trip data which some of the objectors challenged as being unrealistic and is satisfied with the pavement link that is proposed to the site along Barton Road which was another issue of concern to the objectors. The scheme

is considered to meet the requirements of paragraph 32 of the NPPF in that safe access can be provided for all and the requirements of policy T10 of the Mid Suffolk District Local Plan.

53. Comments have also been received that it is unacceptable on safety grounds that a single access is used for this development. It must be remembered that the Manual for Streets allows 250 dwellings to be accessed from a single access point, and to consider refusing this scheme on that ground would be difficult to defend at appeal.
54. The Local Highway Authority has considered the cumulative impact of this proposal and the other 4 schemes currently before the Council both in terms of safety and congestion on the highway network in Thurston and they have come to the conclusion that the impact of the 5 scheme if they all come forwards will be severe. However, the Local Highway Authority made it clear that the NPPF requires all public bodies to try and resolve problems and they are confident that if all 5 developers work together and are brought forwards together, suitable and cost effective alterations can be made to the highway network to ensure that the impact does not become severe. The Local Highway Authority has assessed the road network and has suggested alterations and improvements to key areas of it (see the Highway Department's consultation response earlier in this report for more information) which all 5 developers have been asked to contribute towards through either a section 106 agreement or through the Highways Act. All 5 developers which include Bovis have agreed to contribute towards the works as requested by the Highway Authority. For the Bovis proposal, the Local Highway Authority is requesting £113,754 via a S106 agreement (excluding travel plan costs which are in addition to this), and a further £40,000 under section 278 of the Highway Act.
55. As such, the Local Highway Authority no longer considers that this proposal fails the requirements of paragraph 32 of the NPPF when considered cumulatively with the other 4 residential schemes as the impact with the alterations carried out to the highway network will no longer be severe in terms of safety. For the avoidance of doubt, the Local Highway Authority has not raised any objections to this scheme on congestion grounds and does not consider that additional traffic and queuing as a consequence of this scheme can be considered to be severe to sustain a defensible refusal of planning permission.
56. The Local Highway Authority identify that the scheme will offer sustainable travel options to local residents as additional pavements and bus shelters are proposed and these will link up to both existing facilities and those proposed on neighbouring sites by the other developers seeking at the moment to build houses in Thurston. This will help to improve accessibility on foot and via public transport and will ensure that the site is accessible to the local railway station. The Local Highway Authority is also recommending that the applicant is obligated via a S106 agreement to provide a travel plan to ensure that there are sustainable transport options available to the new residents of the scheme rather than just having to rely on their private cars to access local facilities.
57. Having regards to the specific and cumulative highway impacts of the scheme when considered in line with the requirements of paragraphs 21 and 32 of the NPPF the County Highways Officer has had regards to the fact that in some locations, the impact of the granting of 827 dwellings will be severe on the highway network, but these impacts can successfully be mitigated by the works to the network as suggested. Having regards to the above, it is considered that the proposal complies with the requirements of policy T10 of the local plan and paragraph 32 of the NPPF, in that safe and suitable access for all people can be achieved and that cost effective

improvements can be undertaken to the transport network to ensure that non-motorised modes of transport can be used to access local facilities.

58. An objector has commented that the applicant is suggesting in his documentation that the speed limit adjacent to the site should be extended and reduced from the national speed limit to 30mph and that this is a separate legal process that is outside this planning application. The Local Highway Authority has been questioned on this and he has confirmed that this scheme and the 4 others have been designed and considered at the existing speed limit and that his comments are given on that basis. He has advised that it would be in the public interest to alter the speed limit as suggested by the applicant and he is to take on this alteration under the relevant highway legislation to action it if this and the other Thurston schemes get the go ahead.
59. Comment has been made by an objector that a speed camera is required on Barton Road to resolve existing speed issues. Enforcing the speed limit is a matter for the Police and the local Road Safety Partnership and the placing of static or moveable speed enforcement is something for them to consider and act upon.
60. Having regards to the above, it is considered that this proposal is acceptable in terms of highway safety and complies with the requirements of paragraph 32 of the NPPF and paragraph T10 of the local plan as safe access can be provided for all.

Design And Layout [Impact On Street Scene]

61. Section 7 of the NPPF refers to design. Specifically, paragraph 56 states that good design is a key aspect of sustainable development; it should contribute positively to making places better for people. Decisions should aim to ensure that development will function well and add to the overall quality of the area, establish a strong sense of place, create attractive and comfortable places to live, work and visit, optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Furthermore it provides that development should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The NPPF goes on to state it is "proper to seek to promote or reinforce local distinctiveness" (para 60) and permission should be "refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions" (para 64). In addition policy CS5 provides that "*All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area*" and echoes the provision of the NPPF.
62. Objections have been received stating that the site is currently an open field and that dwellings of the design, scale and density of the proposal, particularly in reference to any 3 storey dwellings potentially being built on site is considered to be inappropriate and urban in form and not in keeping with the rural design and feel of the locality.
63. The applicant has submitted a full application showing 138 dwellings ranging from single storey 2 bedroom bungalows to large two storey 5 bedroom houses and two blocks of flats in the centre of the site which are in the main two storey in height but have 3 storey projections on them to maximise the amount of internal space they can offer. The applicant has shown that 35% of these dwellings are affordable and they are of a specification, location and tenure that is acceptable to the Council's Affordable Housing Officer. The dwellings that surround the site to the south and the west are in the main, bungalows of various styles and designs and they are of 20th

century construction and are not traditional Suffolk style properties. The applicant has in his layout located the smaller properties along the site boundaries with the properties increasing in size towards the centre of the site or where they are screened by natural features so that their impact on the surrounding locality is reduced. The scheme has a density of 26 dwellings per hectare which is not considered to be high and is in keeping with what can be seen in the surrounding locality. The dwellings as proposed are not mock traditional Suffolk properties but have been designed using the local Suffolk style in terms of the proportions, roof style and detailing and the finish of the properties. Whilst as one objector points out the developer offers a similar style of property for sale in Yorkshire which is a consequence of them being a national house builder, the properties offered in Yorkshire and in this site in Suffolk will be different in their detailing, finish and colour.

64. In terms of the layout of the site, a single road is proposed through the site with several estate roads linking through to the dwellings. These are a mixture of adopted highway and private driveways and in terms of the layout, this is not considered to be dissimilar to what is seen in the surrounding area which serves the development off Furze Close and Heather Close.
65. Objections have been received to this scheme on the basis that the proposal is lacking in bungalows and smaller house types and that there are too many 2 and 3 storey properties on site which will impact on the character of the area. It is noted that the applicant is proposing 8 bungalows on site with as the objectors say the majority of the properties being 3 and 4 bedroom two storey dwellings. However, whilst the surrounding area is composed mainly of bungalow type development with the odd house mixed in, it is not considered that this development will be out of keeping and have an adverse impact on the locality as the applicant is locating the smaller properties along the site boundaries to link in with the existing properties and placing the larger properties towards the centre of the site. It is also proposed to use existing landscaping and new landscaping to further screen the proposal and integrate it into the surrounding village and rural landscape.
66. Having regards to the above, it is considered that the scheme in terms of the style and layout of the properties as proposed constitutes good design in line with the requirements of the NPPF and local policy CS5 as it proposes a form of development that would reflect the character, appearance and density of the surrounding settlement. It is agreed that the site does slightly project into the surrounding countryside; however this matter needs to be balanced in coming to a decision about the proposal having regards to all of the positive matters that the scheme brings. As stated in previous topics above, that will be done in concluding this report.

Parish Plan / Neighbourhood Plan

67. A Neighbourhood Plan designation was confirmed in 2013 and covers the Parish of Thurston. At the time of the consideration of this proposal the parish have set up a neighbourhood Plan Committee to prepare the policies for the new Neighbourhood Plan. Both the Parish Council and their Neighbourhood Plan Committee have objected to this scheme with the latter raising objections based on some of the early work that they have carried out for the evidence base for the new plan.
68. The Planning Practice Guidance identifies that *“Paragraph 216 of the National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. Whilst a referendum ensures that the community has the final say*

on whether the neighbourhood plan comes into force, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan. The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals. And all representations on the proposals should have been submitted to the local planning authority by the close of the local planning authority's publicity period. It is for the decision maker in each case to determine what is a material consideration and what weight to give to it".

69. As such, whilst it is ultimately for Members to determine the weight that should be given to the plan, whilst it is at an early stage in its development, it is the view of Officers that little material weight can be given at this time.
70. A comment has been received that states when the Parish Council considered sites for inclusion in its neighbourhood plan that there were 19 sites that were ranked higher in desirability than this one and therefore these sites should come forwards first. As stated above, the Neighbourhood Plan is at an early stage and its weight in decision making is considered by officers having regards to the contents of the NPPF to be limited in the consideration of this proposal. Furthermore, there is a presumption in favour of sustainable housing development in the NPPF and there is no need for developers to sequentially analyse other sites before progressing their own.

Landscape Impact

71. Paragraph 58 of the NPPF states that proposals should provide appropriate landscaping to ensure that they integrate well into the surrounding locality. This requirement is repeated in one of the requirements of policy H13 of the Mid Suffolk District Local Plan.
72. Objections have also been received on the basis that the proposal will extend the built up footprint of the village into the surrounding open countryside which is unacceptable to the objectors and the parish council and that the applicant's landscaping scheme is lacking in detail. Comments have also been made that it is surprising that the applicant has not submitted a landscape assessment report with his application to assess the impact of the scheme both on and from the surrounding countryside.
73. The field that is the subject of this proposal is on the edge of the settlement limit for Thurston with existing residential development fully along its western boundary and approximately three plots short on the Barton Road boundary. Residential development already exists directly to the south of the site and the south east corner of the field has already been lost in the past to the properties known as Marley Close. So in effect, the only part of the site that lies adjacent to the open countryside is the northern boundary of the site which is as existing is screened with tall trees and hedging from the surrounding countryside. The site is also screened as existing from Barton Road by a dense hedge; however a part of this will have to be removed to facilitate this development due to the need to provide the necessary safe access visibility splays.
74. The Council has sought comments from its Landscape Consultant on the scheme and as part of their assessment they have asked the applicant to provide the missing landscape assessment which is referred to by the objectors. The Landscape Consultant has examined the report and agrees with the LVIA assessment that the applicant has made and the mitigation measures proposed. The Landscape

Consultant asked for additional information as regards the landscaping for the internal part of the site and following the submission of this by the applicant, he has confirmed that he is satisfied with what the applicant is proposing. Specific details of the plant species and numbers can be received via a planning condition if permission is given for this scheme.

75. Objectors to this scheme have raised concerns that the development may harm some of the existing trees on site due to the closeness to their root zones and that leaf fall from the trees will be a nuisance to the new residents. The Council's Tree Officer has been consulted on this scheme and he has not object to it. He has requested that plot 1 be redesigned so that its impact on the important tree that lies adjacent to it is minimised. The applicant has done this by moving plot 1 further away from the tree and deleting the garage and as such no development is now proposed in its root zone. The Council's Tree Officer has been consulted on this change and he supports what the applicant's amendments. A condition will be imposed if this proposal is approved requesting a scheme to be submitted to protect the existing trees on site which are to be retained as part of this scheme.
76. The Council's Tree Officer has asked in his consultation response if it is necessary to lose so much of the hedging to form the access onto Barton Road and he requests if it is possible that more of it is retained. However, The Local Highways Authority has made it clear that due to the location of the site and the increase of the speed limit from 30mph to the national speed limit just a short distance away from the site on Barton Road that it is necessary to remove a large part of the hedge to facilitate the visibility splay for the sake of highway safety. However, it is considered that it will be possible as part of the landscaping scheme for this proposal to plant a suitable replacement within the site and outside the visibility splay for the access.
77. Having regards to the requirements of policy H13 of the MSDC Local Plan and paragraph 58 of the NPPF, it is considered that the scheme can use existing and provide suitable new screen landscaping both within and on the boundaries of the site to ensure that it assimilates well into the rural edge of Thurston and provides an attractive environment both for the new residents of the site and those living in the surrounding locality. It is unfortunate that part of an existing hedge has to be removed to facilitate the new access into the site and this dis-benefit will be considered when weighing up at the end of the report as to whether the proposal constitutes sustainable development.

Residential Amenity

78. Policies within the adopted development plan require, inter alia, that development does not materially or detrimentally affect the amenities of the occupiers of neighbouring properties. This requirement is emphasised in the NPPF Core Values in paragraph 17 where it states that all schemes should seek a good standard of amenity for all existing and future occupants of land and buildings.
79. A number of points have been raised by the objectors to this scheme in terms of its impact on their residential amenity (or living conditions). In the main, these relate to the fact that in some parts of the site, two storey dwellings will face existing bungalows, the separation distances between existing and proposed is too short, some of the new properties will overlook existing gardens and street lighting will alter the night time outlook for existing residents.
80. The properties on Heather Close lie to the west of the site and 17 new dwellings are proposed spanning from the north to the south of the western boundary of the site.

The new dwellings proposed along this boundary are predominantly two storeys with the exception of 4 bungalows. To minimise the impact of overlooking, where habitable windows from properties face each the Council expects that a minimum distance of 20m shall be provided which is based on the appropriate standard which has arisen from case law and appeal decisions. For the sake of clarity, the 20m distance is from window to window and not to the garden boundary. In this instance, where the properties directly face each other the distances exceed the Council's standards. In the applicant's submission it shows a distance of 23.38m from plot 53 to the property behind it and 20.93m from plot 43 to the property behind that. Some of these properties are further screened by existing trees on site but this is not uniform along this boundary, neither is a continuous garden fence. It is considered appropriate to request that the applicant provides via a planning condition a suitable hard boundary along this part of the site to maintain the privacy of the residents of both the new and existing properties. This can be augmented by suitable tree and hedge planting as suggested in the applicant's plan to improve the quality and the visual appearance of the scheme. Trees within each individual plot will have to be maintained by the property owner with the trees within the public realm managed by a management company. The developer will not manage all landscaping and trees as requested by one of the objectors as this would be unreasonable.

81. The Southern boundary of the site faces the existing dwellings on Bracken Row, Roman Way and Furze Close. The existing properties on these roads are predominantly bungalows but they differ significantly in size with each other depending on which of the roads they are on. The applicant is proposing 4 bungalows and 5 two storey dwellings along this boundary and again the distances between the proposed and the existing dwellings exceed the 20m standard. As is the case with the western boundary, some of the properties are screened by existing trees and hedging but it is considered appropriate that suitable screen fencing is located along the southern boundary of the site to protect the living conditions of both the new occupiers and the existing occupiers of the surrounding properties.
82. On the south eastern corner of the site, Marley Close exists and this development has taken a rectangular chunk out of the corner of the field. The properties in Marley Close that have their boundaries with the application site have a number of large and dense trees within which helps to provide screening, although objectors point out that it is possible to see through the trees due to their species. At this location there is significantly more than 21m between the proposed dwellings and those which lie to their east in Marley Close so the impact of direct overlooking will be minimised. The northern boundary of Marley Close with the application site also has tree cover within it, but it is not as dense as the other boundary and has gaps within it. However, the properties have been designed so that they face side on to this boundary at this location without main habitable windows in them. The side of plot 11 will face the side elevation of the property directly to its south on Marley Close with plot 1 also facing the property to its south side on with existing mature trees in between. The property on Marley Close front faces plot 1, but it is considered that due to the angle between both properties and the trees between them, that overlooking and loss of privacy will be minimised. Furthermore, the recent amended plans have moved plot one slightly further away from the tree into the site and as such, the distance between plot 1 and the opposing property on Marley Close will be further away than originally proposed.
83. Comment has been made that a number of the proposed properties due to them being two storeys will impact on the enjoyment of the existing occupiers when using their gardens in terms of loss of privacy. When considering the impact of a scheme on the privacy of an existing occupier, it must be remembered that a garden area is not habitable space and an element of loss of privacy is expected where

development is next to each other (such as is the case on many new housing estates). However, as stated above, a condition is suggested which will require the developer to install suitable screen fencing to minimise overlooking and loss of privacy to the nearby existing occupiers.

84. In terms of loss of daylight and sunlight the properties on Heather Close are the only ones that will be affected as the properties without trees in their gardens currently have an open aspect onto the field where they benefit from the sun as it rises and travels throughout the day. The erection of dwellings in this location will impact on the amount of direct sunlight received in the morning as the sun rises, but due to the distance between the properties which is in excess of 20m they will still benefit from sunlight to their eastern facing windows during the day. It is not considered that the scheme will have an impact on the amount of daylight that any of the existing properties receive as the new dwellings are not close enough to overshadow and dominate. It is therefore not considered necessary in terms of daylight and sunlight for the dwellings along the western and southern boundaries of the site to all be bungalows as suggested by the objectors.
85. An objector has requested that the permitted development rights of the properties on the elevations facing existing properties should be removed to prevent them from building extensions in the future. However, it is not considered that is appropriate here as the government no longer encourages the blanket removal of permitted development rights and it is considered that the requirements that are contained in the regulations in terms of the size and type of extension that can be built which is dependent on garden size will be sufficient to protect the living conditions of the surrounding occupiers whilst not disadvantaging the occupiers of the new properties.
86. The objectors consider that the street lighting associated with the dwellings will be intrusive and have a negative impact on their living conditions. It is clear that allowing permission for this scheme will alter the locality as the field is currently dark and this will be change. However, the street lighting will be within the site and not directly adjacent to the existing properties and designed to the requirements of the Local Highway Authority. As such this should have a minimal impact on the living conditions of the surrounding occupiers.
87. A condition on any permission that the council may grant on this proposal can be imposed requesting that the applicant enters into a construction management agreement with the Council to safeguard the living conditions of the surrounding occupiers during the construction phase of the scheme.
88. The layout and the detailed design of the properties do not give rise to any significant concerns in terms of loss of neighbour amenity, either in terms of privacy, loss of daylight and sunlight and the proposal is considered to meet the relevant NPPF core value in paragraph 17 and the requirements of paragraph 123.

Environmental Impacts - Trees, Ecology And Land Contamination

89. The application site is a grade 3a agricultural parcel of land which is currently in use for agricultural purposes. As the site is in an agricultural use, there is limited tree cover within the site with the majority of the trees running along the site boundary.
90. Objections have been received to this scheme from local residents and the Suffolk Wildlife Trust on the basis that the loss of the field and the hedgerow on the boundary of the field to Barton Road to create residential development will have a negative impact on animal species, particularly protected and priority species in the

locality. Mention has specifically been made that the Wildlife Trust considers that the site is a prime habitat for Skylarks, Brown Hares and Hedgehogs and the loss of the hedge to create the access will harm bats which feed and forage in it.

91. Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) provides that all "competent authorities" (public bodies) to "have regard to the Habitats Directive in the exercise of its functions." In order for a Local Planning Authority to comply with regulation 9(5) it must "engage" with the provisions of the Habitats Directive.
92. The content of paragraph 118 of the NPPF is also applicable to the consideration of this proposal as it states that when determining planning applications, consideration must be given to 6 principles. The two following principles are applicable to this scheme:
93. If significant harm is caused which cannot be avoided or mitigated by conditions then planning permission should be refused.
94. Opportunities to integrate biodiversity in and around developments should be supported.
95. The Council's Consultant Ecologist has been consulted on this application and they have confirmed that the site contains priority habitat in the form of Bats, Amphibians, Hares, Skylark and potentially Hedgehogs. She has advised that she has considered the applicant's Ecological Report and is satisfied with its findings and requests that conditions are imposed to limit the level of lighting on site and to ensure that the scheme is carried out in accordance with the recommendation of the ecology report. In coming to their conclusion on this scheme, the Ecology Consultant is aware of the Local Highway Authority's requirements to remove part of the hedge on Barton Road to facilitate the access visibility splay, but they are confident that the loss habitat can be compensated for within the site. In terms of Skylarks, the Consultant Ecologist notes that the development of this land would have a negative impact on them and they have agreed with the applicant a scheme to provide off site mitigation to compensate for this loss. This can be secured via a section 106 legal agreement as the parcel of land does not fall within the application site. Natural England has also been consulted on this scheme, and they have not raised any comments in relation to it.
97. Paragraph 112 of the NPPF states that local authorities should take into account the economic and other benefits of the best and most versatile agricultural land when making planning decisions. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use poorer quality land in preference to that of higher quality land. Agricultural land is split into categories with land defined as 3a up to 1 being best and most versatile land and grades 3b down to 5 not being defined as best and most versatile land. The application site is a Grade 3a and as such it is defined as best and most versatile agricultural land and as such the requirements of paragraph 112 of the NPPF apply to the determination of this scheme. Paragraph 112 does not preclude the development of land classified as best and most versatile agricultural land; it requires local authorities in making decisions to take account of the economic and other benefit of the best and most versatile agricultural land. The NPPF states that where significant development is proposed, local authorities should seek to use areas of poorer quality land in preference to the higher quality land.

98. The applicant has submitted an agricultural assessment with his application to allow the council to make the assessment as required in the NPPF. In the assessment the applicant makes the point that the parcel of land cannot be considered to be 'significant' as this is defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015 where it states that Natural England should only be consulted on plans involving the loss of 20ha or more of land on grades 1, 2 and 3a. As such, the parcel of land falls below the threshold and the consideration of other land which is of a poorer quality does not have to happen. The case officer agrees with the point made above by the applicant as in his experience, this has been replicated in other Council's where similar schemes have come forward for consideration.
99. In considering the economic and other benefit of the land, it must be remembered that the parcel of land constitutes only 5ha. Having looked at the agricultural land classifications for Mid Suffolk, most of the land within the district is classified as 2, 3a and 3b with very little land in the lower categories. As the district is predominantly rural in character it is not considered that the loss of this parcel of land either on its own, or considered cumulatively with the 4 other sites that have been put forwards for development in Thurston will have a significantly negative impact on agriculture and specifically food production, or on the local economy.
100. The Council's Contaminated Land Officer has been consulted on this scheme and he has reviewed the documentation submitted by the applicant (Phase 1 risk assessment). Paragraph 121 of the NPPF makes it clear that planning decisions should make sure that the site is suitable for its new use taking account the hazards of any previous use. The Contaminated Land Officer has not raised any objections to the scheme subject to the imposition of conditions requesting that the works on site be carried in line with the applicant's contamination report.
101. Having regards to the above it is considered that the proposal complies with the requirements of paragraph 112 of the NPPF in terms of agricultural land, its effects on Priority Species can be mitigated and the landscaped areas within the site can be adequately maintained in the future to protect their biodiversity value.

Heritage Issues (The Setting Of Neighbouring Listed Buildings)

102. Both the NPPF and Core Strategy place significant emphasis on safeguarding heritage as an important component of sustainable development.
103. With reference to the treatment of the submitted application, the Council embraces its statutory duties and responsibilities in relation to listed buildings, notably the general duties undersections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires the local planning authority to have "*special regard to the desirability of preserving [a] building or its setting or any features of special architectural or historic interest which it possesses*".
104. Recent case law on the application of the statutory duty acknowledges that the consideration of the impact of a proposed development on the significance of a designated heritage asset is a matter for its own planning judgement, but that the Local Planning Authority is required to give any such harm considerable importance and weight. However, where special regard to the desirability of preserving heritage assets has been paid and no harm is considered to be posed, the 'balancing' of harm (which should be given considerable weight as above) against public benefits as required by the NPPF, is not engaged.

105. Policy HB1 (Protection of Historic Buildings) places a high priority on the protection of the character and appearance of historic buildings, particularly the setting of Listed Buildings.
106. In paragraph 17 of the NPPF it makes it clear that development should “*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*”. Para 131 goes on to state that “*In determining planning applications, local planning authorities should take account of; the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness*”. Furthermore Para 132 states “*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.*”
107. No objections have been made to this scheme on Heritage grounds and the Council’s Heritage Officer has confirmed that due to the location of the site and the surrounding residential land uses that he does not raise any comments in relation to this scheme as it does not affect the setting of any listed buildings in the locality. Historic England has also not objected to this scheme. The proposal therefore complies with paragraph 132 of the NPPF
108. As there are 5 different applications for major housing development in the northern part of Thurston, the Council’s Heritage Officer has been asked to consider the cumulative impact of this scheme in relation to the others. Of the 5 applications, the application by Hopkins Homes for 175 homes (application 2798/16 and appeal 5010/16) and the one by Pigeon Capital (5070/16) are the only two out of the 5 that are considered to cumulatively have an impact on the settings of the listed buildings in the locality and this is assessed more appropriately in the reports for both of those applications.

Environment And Flood Risk

109. Paragraph 100 of the NPPF makes it clear that inappropriate development in areas of flood risk should be avoided by directing development away from areas of highest risk. The contents of policy CS4 of the Mid Suffolk Core Strategy is in line with the requirements of the NPPF in terms of flood risk and carries significant weight in the determination of this application. In terms of flooding from rivers, the site complies with local and national policy as it lies in a flood zone 1 area which is land at least risk of flooding. To deal with surface water, the applicant is proposing a drainage pond within the south western corner of the site with the surface water flow from the site channelled into it.
110. Objections have been received raising concerns that the development of the site may cause localised floods in the area. Anglian Water and the County Flood and Water team have been consulted on this proposal. Neither Anglian Water nor the Environment Agency has objected to this proposal, but the County Flood and Water team has asked for additional information on this scheme. Additional information has

been provided, however the County still considered this to be deficient and have asked for further information from the applicant. At the time of revising this report, the applicant was in negotiation with the County Flood and Water Team and an update of on the situation will be provided to the members at the meeting.

111. Due to unprecedented level of growth currently suggested for Thurston, the Environment Agency, County Flood and Water team and Anglian Water have been specifically asked to consider the cumulative impact of this proposal on drainage, flood risk and water supply grounds. The Environment Agency and the County Suds team have advised that an increase of 827 dwellings with the mitigation measures proposed by the applicants will not increase flood risk in terms of surface water drainage in the locality to an unacceptable level. Confirmation has also been received that there is capacity in the local pumping station to serve 827 new dwellings in terms of sewage needs. Thurston lies in an area where water supply can be an issue, however Anglian Water has a duty by law to supply new houses with a water supply and this is a matter for them to resolve under their legislation.
112. Having regards to the above, it is considered in terms of flood risk, water supply and drainage that the scheme when either considered singularly or cumulatively can be made acceptable subject to the imposition of a suitably worded condition to meet the requirements of paragraph 100 of the NPPF and policy CS4 of the Mid Suffolk Core Strategy.

Infrastructure - Planning Obligations / CIL contributions

113. Objections have been received to this scheme on the grounds that the local infrastructure, which includes the local schools and health care, is insufficient to meet the need of the residents of this proposal. Comment has been made that if the scheme is approved without suitable provision, then it will cause significant impact on the existing community of Thurston.
114. The Council has now implemented CIL which accordingly takes on board requirements such as open space contribution, NHS and education contributions.
115. As part of this proposal the contributions will be sought under the Council's CIL Scheme for improvements to the following:
 - For the future expansion of the doctor's surgery in Moreton Hall which the residents of this scheme would use.
 - For improvements to the local library provision.
 - Safety improvements to the Thurston Railway station.
116. Objections have been received to this scheme on the grounds that a new doctor's surgery will not be provided and that the proposal will cause capacity issues at the local surgeries. It should be noted that the Primary Care Trust (PCT) has made it clear that due to the existing situation with doctors, their salaries and contracts and the government's policy in terms of the NHS that a new doctor's surgery will not happen in Thurston as part of any of the 5 schemes. The PCT will be requesting contributions through CIL in relation to all 5 schemes and the monies will be used to improve the service offered and/or improve the facilities at either the Woolpit Surgery or at the Park Farm Surgery in Moreton Hall to meet the expected needs of the additional residents of the new dwellings in Thurston. They have specified that they will seek a contribution towards improvements at the Woolpit Surgery in relation to this proposal.

117. It has been identified following discussion with the County Infrastructure Officer that as suggested by the objectors and the Parish Council, there is no capacity in the local primary school to expand and as such a contribution of £476,441 is required towards the building of a new 420 place two form primary school either on the Persimmon or the pigeon site elsewhere in the village. It has also been suggested that a further £116,662 is required for the provision of new pre-school, which will be accommodated at the new school to help meet the demand generated by this development. As the CIL 123 list does not include the provision of new pre-school or primary school facilities (it only covers extensions to existing establishments) these contributions will have to be sought under S106 of the Planning Act and the applicant has agreed to the above payments.
118. The County Council has also clarified that whilst the new school is being built, the existing primary school in Thurston will be provided with two temporary classrooms funded via CIL to cope on a 2 to 3 year period with the increase in pupils generated from the first phase of new housebuilding in Thurston (from any of the 5 sites currently under consideration) until the new school is built. Once that happens, the existing school will be closed and the existing pupils moved over to the new school and the new school will be extended as appropriate up to a capacity of 420 pupils to accommodate the primary school age children arising from any of the proposed housing sites in Thurston. It is understood that the Diocese who own the primary school have committed to ploughing the capital receipt that they receive for the development of the existing school site into the new school which is also to be funded by a joint contribution by all 5 of the developers proposing major housing schemes currently in Thurston.
119. Following further dialogue with the County Obligations Manager it is understood that progress is being made to secure options on the potential school sites proposed in other applications. The delivery of a new primary school is a necessary pre-requisite to mitigate the potential pressure on education infrastructure from the development and it has been agreed that a restrictive phasing condition is not necessary given the progress that has been made on options. Nevertheless the securing of a primary school site is a material consideration upon which the delivery of this development is predicated.
120. The County Council has confirmed that there is capacity at all of the catchment secondary schools in the locality and as such a financial contribution towards new facilities is not warranted in that instance.
121. As is the case for new education buildings, affordable Housing is not part of CIL and members should note that policy to seek up to a 35% provision remains in effect. The applicant has confirmed that he is agreeable to provide a policy compliant scheme for affordable housing and that this will be achieved via a Section 106 contribution and the Council's Strategic Housing Officer has not objected to this proposal.
122. Network Rail has been consulted on this scheme and has asked for a contribution of £1million through a S106 agreement between all five developers to close the existing level crossing and to provide safer and improved facilities at Thurston Railway Station having regards to the increased use of the facilities that will occur from the residents of the proposed 827 dwellings. The Council's CIL 123 list includes provision for improvements to transport infrastructure. As such it is considered that it would be appropriate for Network Rail to bid for the specified amount to make the improvements they have requested to improve pedestrian safety at the station under the CIL scheme.

123. The Highway Authority has, as stated earlier in the report, asked for £113,754 under section 106 of the Planning act to pay for Bovis' part of the contribution for works to the highway infrastructure to ensure that the impact of approving all 5 housing schemes totalling 872 houses in Thurston is not severe on the highway network as referred to in paragraph 32 of the NPPF.
124. It is noted that within the application site there is a pond, open space and landscaped areas and concerns have been received from the objectors over how these will be maintained. This will be done via a S106 agreement whereby the developer has to employ a management company to look after this land. None of it is to be transferred to the Council or the Parish Council as part of this or any of the other 4 schemes.
125. Having regards to the above, in accordance with the Community Infrastructure Levy Regulations, 2010, the obligations recommended to be secured above by way of a planning obligation deed are (a) necessary to make the Development acceptable in planning terms (b) directly related to the Development and (c) fairly and reasonably relate in scale and kind to the Development.
126. In response to an objector comments, it would be unreasonable to expect the developer of this or any other application to not build the properties and wait for all of the necessary infrastructure to be in place first. It would also be unreasonable to refuse planning permission for this and the other schemes where the developers have agreed to fund works to resolve the infrastructure issues identified. To ensure that the correct level of infrastructure appears at the correct time, the Council and its partners will work with the developers so that appropriate triggers are in the S106 legal agreements to ensure this happens.

Other Issues

127. Objections have been made to this scheme on the grounds that there are other more suitable sites elsewhere and these should come first. It must be remembered that each planning application must be considered under its own planning merits and specifically in terms of housing; there is no national requirement for a sequential test for preferred housing sites within an area.
128. An objection has been received on the basis that the proposal will turn Thurston from a village into a town. Whilst Thurston will get larger as a consequence of additional housing growth, its status will remain as a village and it does not automatically turn into a town. This objection is not considered to be material in the consideration of this proposal.
129. Mention has also been made that the scheme will have an impact on property prices in Thurston and that many houses have already gone for sale in the locality in anticipation. The courts have decided that this is not a material planning consideration in this or any other planning application.
130. A concern has also been raised that the erection of dwellings in this location will increase crime in the locality and the fear of crime for existing surrounding residents. The applicant has designed the scheme so that open areas of the site are overlooked so that opportunities for crime are minimised both within the site and from the site into the surrounding neighbouring properties.

Details Of Financial Benefits / Implications (S155 Housing and Planning Act 2016)

Council Tax payments from the dwellings when built
Planning Delivery Grant from Central Government for delivering the dwellings
S106 Agreement:

- £476,441 is required towards the building of a new primary school in Thurston.
- £37,526 towards the cost of the land to provide the new primary school.
- £116,662 is required for the provision of new pre-school facility in Thurston
- £113,754 is required for highway infrastructure works
- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum until five years have passed after occupation of the final dwelling.
- Travel Plan Implementation Bond - £108,585
- CIL payments per dwelling built on site.

PART FOUR – CONCLUSION

Planning Balance

130. The proposal for residential development off Barton Road in Thurston is considered to be contrary to the adopted Mid Suffolk Core Strategy as the application site lies within the countryside outside the built framework of the settlement of Thurston on what is agricultural land.
131. However, as the housing policies in the Core Strategy are out of date due to the Council not having a deliverable five year supply of housing, this scheme falls to be considered in relation to paragraph 14 and 49 of the NPPF which relate to residential development and sustainable development.
132. Paragraph 14 states that where the development plan for the area is out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole or specific policies in the NPPF which indicate that the development should be restricted. Whilst it has been identified that the proposal either when considered on its own or in combination with the four other residential schemes that are with the Council for consideration will have an adverse impact on the quality of the landscape character of the area, and that it will result in the irreplaceable loss of countryside and grade 3b agricultural land, will result in the loss of a hedge which provides habitat to protected species and will have an impact on the habitat of priority and has a potentially severe impact on parts of the highway network if not mitigated, it is considered that the benefits that the scheme brings such as the provision of 136 new houses of which 35% of them will be affordable, contributions towards local infrastructure such as the highways improvements, and a new primary school outweighs the negative issues.
133. Significant weight must also be given to the fact that there are no unresolved objections from the Council's consultees to the scheme. There are no objections in terms of design; crime prevention; amenity; pollution; contamination; ecology; landscape; flood risk and drainage. The proposal will also help to deliver construction jobs and will also provide more residents who will help to sustain and potentially grow the local economy.
134. In relation to highways impacts there are road safety impacts which can be

addressed through mitigation at Fishwick Corner and other highways infrastructure improvements which weigh in favour of the scheme by providing enhanced sustainable links.

135. There remains a road safety and capacity issue at the A143 Thurston Road junction (adjacent to The Bunbury Arms). A number of solutions have been investigated and the current preferred solution is traffic signals. The highway authority consider that the effects of the development can be mitigated but further detailed work needs to be undertaken to obtain the most practicable and viable solution to address the risks. For this reason Committee is asked to reach a “minded to” resolution which reserves the local planning authority’s position pending the outcome of that detailed further investigation and junction design. Once the outcome of this investigation is known the application can be reported with a substantive recommendation to Committee.
136. Therefore, it is considered having regards to paragraph 14 of the NPPF that the benefit the proposal brings outweighs the negatives. Furthermore, when assessing the proposal against the NPPF it is not contrary to its requirements as a whole and there are no specific policies within it that would restrict this development and as such it is considered that it constitutes sustainable development which should be approved planning permission without delay in line with the requirements of paragraph 14.

Statement Required By Article 35 Of The Town And Country Planning (Development Management Procedure) Order 2015.

137. When determining planning applications The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain how, in dealing with the application they have worked with the applicant to resolve any problems or issues arising.
138. In this case the planning authority has worked with the applicant to overcome highway objections to the scheme and to clarify issues relating to drainage and impact on listed buildings.

Identification of any Legal Implications of the decision

139. There are no known legal implications derived from the determination of this application.
140. The application has been considered in respect of the current development plan policies and relevant planning legalisation. Other legislation including the following have been considered in respect of the proposed development.
- Human Rights Act 1998
 - The Equalities Act 2012
 - Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
 - Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
 - The Conservation of Habitats and Species Regulations 2010
 - Localism Act
 - Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

RECOMMENDATION

That Committee express a “minded to” resolution, subject to the further investigation and reporting back of highway matters in relation to the A143 Thurston Road junction, on the following basis:

That the authority would be minded to delegate to the Corporate Manager - Growth & Sustainable Planning to grant full planning permission subject to the prior completion of a Section 106 or Undertaking on terms to his satisfaction to secure the following heads of terms:

- £476,441 is required towards the building of a new primary school in Thurston.
- £37,526 towards the cost of the land to provide the new primary school.
- £116,662 is required for the provision of new pre-school facility in Thurston
- 35% Affordable Housing to be transferred over to a Registered Provider
- To secure the provision of public open space to be managed by a dedicated management company
- £113,754 to secure off site highway improvement works as listed below:
 - Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £47975 is required on commencement of work on site
 - 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 £8711 is required at the commencement of the first dwelling.
 - Contribution towards extension of the 30mph speed limit on Barton Road west of Mill Lane. A contribution of £8000 is required on commencement of construction work on site.
 - Contribution towards provision of pedestrian crossing facilities at the junction of Norton Road / Station Hill / Ixworth Road. A contribution of £15068 is required on occupation of the first dwelling.
 - Creation of new Prow along the southern boundary of the site to Heath Road (Cycle route 51). A contribution of £34000 is required on completion fo 50% of the total number of dwellings.
- To secure a travel plan in connection with the scheme detailed as follows:
 - Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum until five years have passed after occupation of the final dwelling. 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
 - Travel Plan Implementation Bond - £108,585 (based on SCC calculations on the estimated cost of fully implementing the travel plan for 140 dwellings). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.

- Provision of Skylark Mitigation
- Setting up of a management company to look after the open space and Sustainable Drainage parts of the scheme.

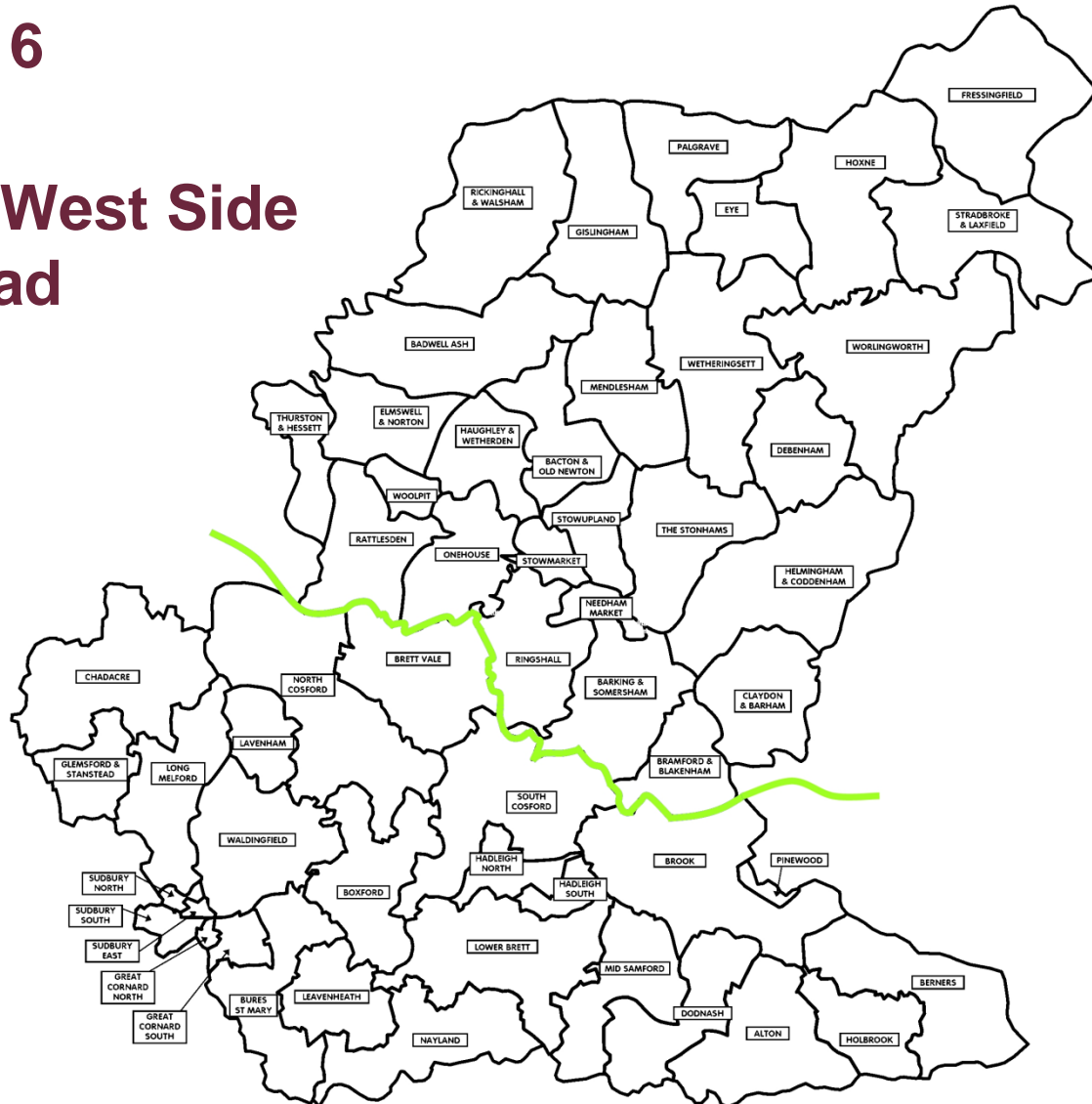
and that such permission be subject to the conditions as set out below:

- 1) Two year time start time (as opposed to the usual 3)
- 2) Existing tree protection
- 3) Construction management agreement
- 4) External lighting
- 5) Landscaping details
- 6) Commencement period for landscaping
- 7) Protection of birds during construction period
- 8) Works to be carried out in line with the ecological report.
- 9) Materials
- 10) Landscaping
- 11) Residential boundary treatment
- 12) Highway Conditions (covering site access, Internal layout, Construction management plan, highway drainage, footway and cycle connectivity)
- 13) Surface water drainage
- 14) Fire Hydrant requirements

Application No: 4386/16

**Address: Land On The West Side
Of Barton Road
Thurston
IP31 3NT**

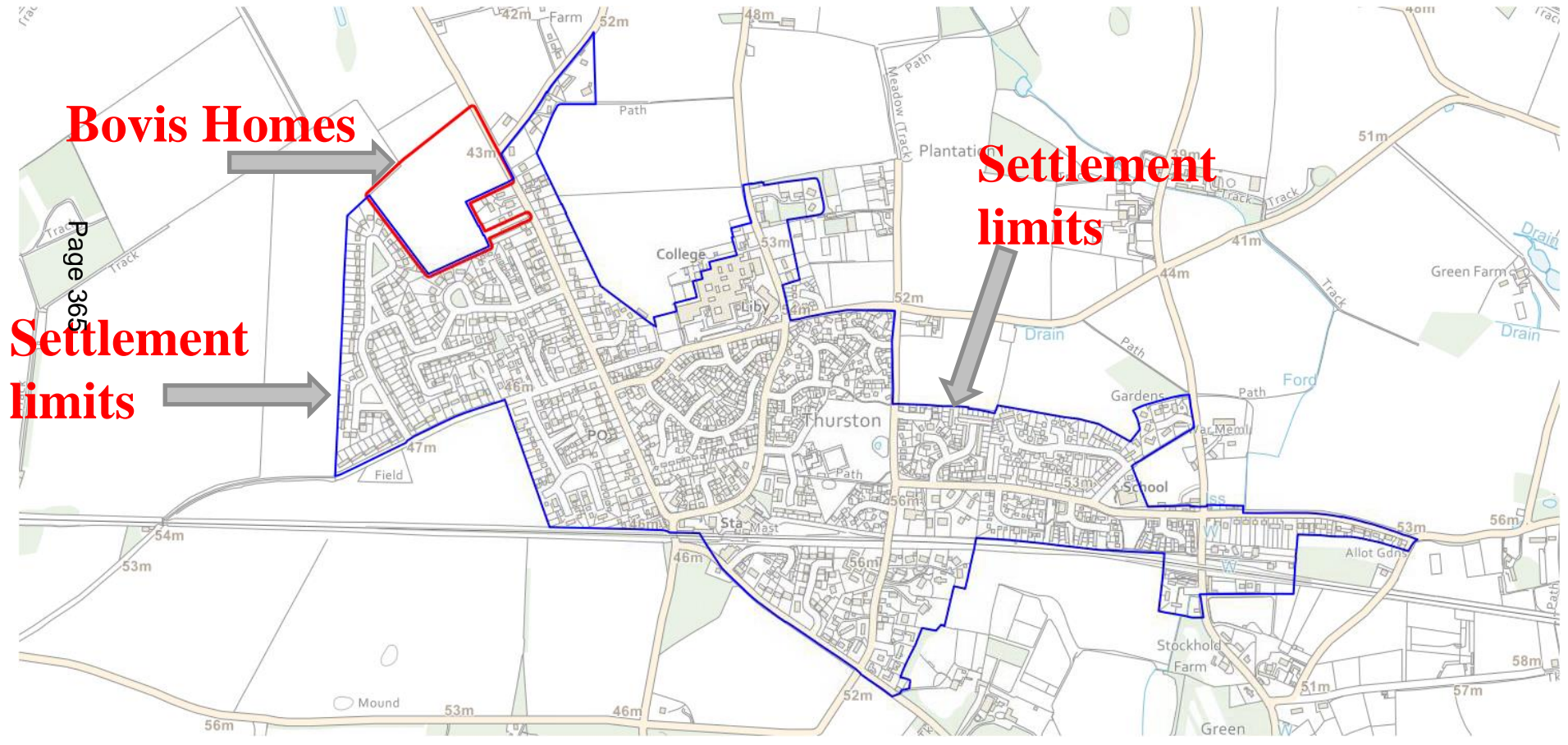
Page 363





Verbal Updates:

- Confirmation and summary of any 3rd Party representations received not previously issued to members.
- Confirmation and summary of any consultee responses received not previously issued to members
- Confirmation of any changes to recommendation, conditions or reasons.



Bovis Homes

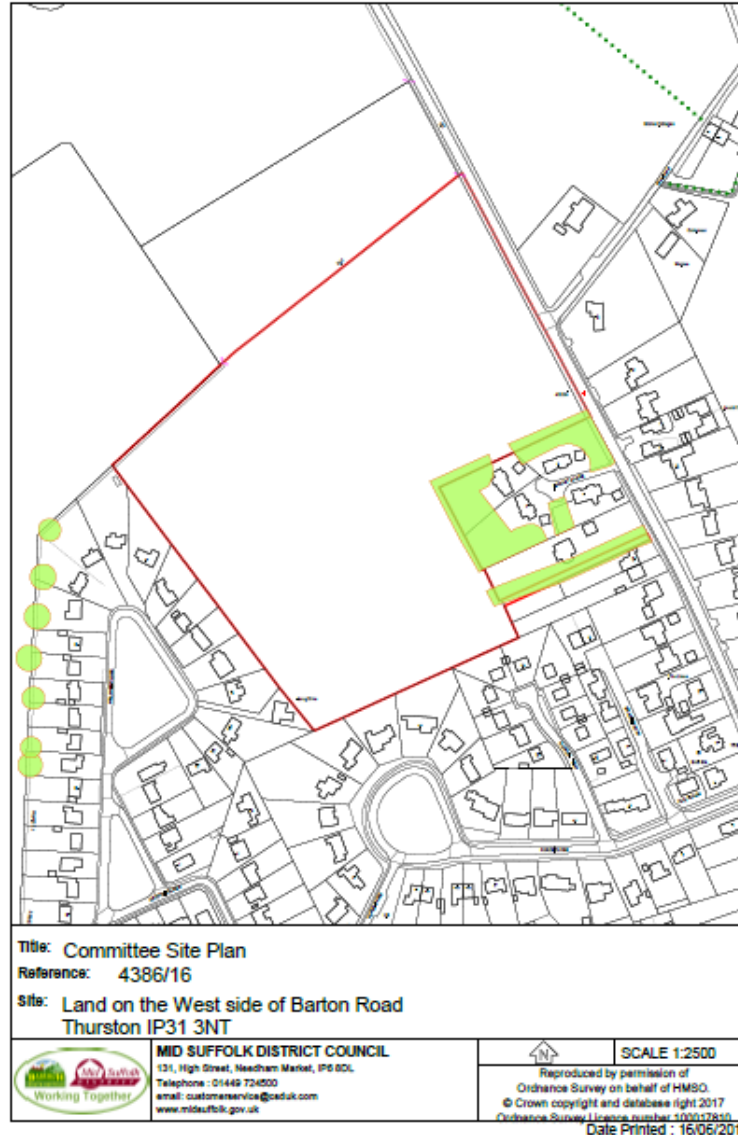
**Settlement
limits**

**Settlement
limits**

Location Plan & Constraints Map

Slide 4

Page 366



Example House types

Slide 6



A3

scale 1:100

NOTES

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| REV | DESCRIPTION | DATE | AUTH | LOGS |
|-----|-------------|------|------|------|
| | | | | |

Front Elevation

Side Elevation

Rear Elevation

Side Elevation

Ground Floor Plan

4 Ripon Road Northampton, NN1 5AR
T: 03004 32247 F: 0300022247 www.rua.co.uk

| | |
|-----------------------------|--------------------|
| PROJECT | |
| Barton Road | |
| Thurston | |
| For: Bovis Homes | |
| DRAWING | |
| House Type Planning Drawing | |
| Type A - Bungalow | |
| Plans & Elevs | |
| SCALE | DATE |
| 1:100 @ A3 | 19.02.17 |
| FOR NO. | DRAWING NO. |
| BTH | HT_TYPE A-1-FE |
| CLIENT REF. | |
| Bovis Homes | |

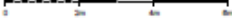
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| Revised: | Location: | PLOT No. - As Drawn: 40,41,46,47 |
| Drawings: 2 | Pages: 3 | |
| Scale: 631 | Size: 58.62 | |

Example House types

Page 370

A3


scale 1:100



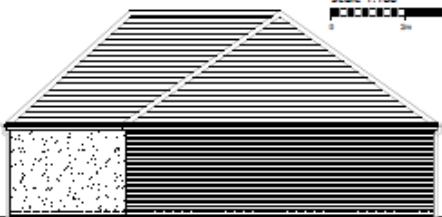
NOTES

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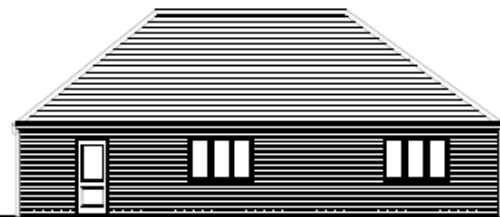
| REV | DESCRIPTION | DATE | AUTH | CHKD |
|-----|-------------------------------|----------|------|------|
| A | Plot number adjusted to suit. | 20.03.17 | JC | DR |



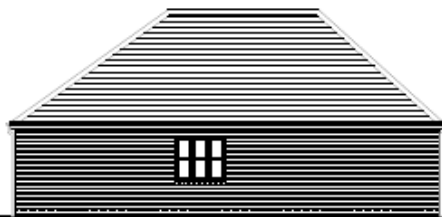
Front Elevation



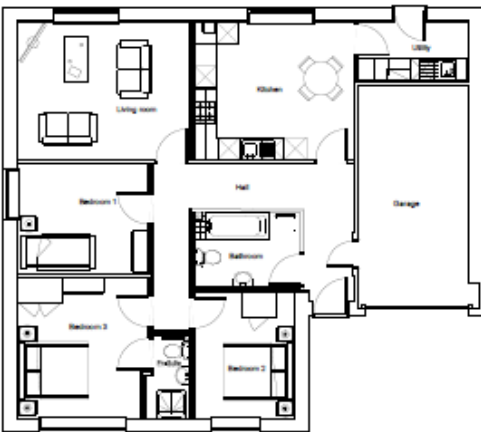
Side Elevation




Rear Elevation



Side Elevation



Ground floor plan



RUA
ARCHITECTURE
URBAN DESIGN

4 Spenser Parade Northampton, NN1 6AA
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| | |
|--|-----------------|
| PROJECT | |
| Barton Road Thurston | |
| For: Bovis Homes | |
| DRAWING | |
| House Type Planning Drawing 3B-Bungalow | |
| SCALE | DATE |
| 1:100 @ A3 | 14-03-16 |
| AUTHOR | CHKD |
| JC | DR |
| DWG NO. | REV |
| BTH | HT_3B-BUNG-1-PE |
| CLIENT REF. | CLIENT |
| Bovis Homes | |

| | |
|-------------|-------------|
| House type: | 3B-Bungalow |
| Drawings: | 3 |
| Plot No.: | 1043 |

| | |
|-----------|------------------|
| Version: | 5 |
| As Drawn: | 34,42 Handed: 43 |
| Area: | 96.84 |

A3

scale 1:100

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| REV | DESCRIPTION | DATE | AUTH | CHKD |
|-----|------------------------------|----------|------|------|
| A | Not numbers adjusted to suit | 20.03.17 | JC | IR |

FRONT ELEVATION

SIDE ELEVATION

REAR ELEVATION

SIDE ELEVATION

FIRST FLOOR

GROUND FLOOR

RUA ARCHITECTURE URBAN DESIGN

4 Riverside Parade Northampton, NN2 5AA
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| | |
|-----------------------------|--------------------|
| PROJECT | |
| Barton Road | |
| Thurston | |
| For: Bovis Homes | |
| DRAWING | |
| House Type Planning Drawing | |
| P306 | |
| Brick Version | |
| SCALE | DATE |
| 1:100 @ A3 | 14-03-16 |
| AUTHOR | CHKD |
| JC | IR |
| SUB NO. | DRAWING NO. |
| BTH | HT_P306-1-PE |
| REV | |
| A | |
| CLIENT REF. | |
| Bovis Homes | |

| | | | |
|--------------|------|--------------|-------|
| Manufacturer | P306 | Construction | Brick |
| Drawings | 3 | Plans | 5 |
| Top A | 971 | Area | 90.15 |

| | |
|--------------|--|
| PLOT No. - | |
| As Drawn: 37 | |
| Handed: 36 | |

A3

scale 1:100

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| REV | DESCRIPTION | DATE | AUTH | CHKD |
|-----|--------------------------------|----------|------|------|
| A | Plot numbers adjusted to suit. | 22.03.17 | JC | |

FRONT ELEVATION

REAR ELEVATION

FIRST FLOOR

SIDE ELEVATION

SIDE ELEVATION

GROUND FLOOR

| | | | |
|------------|--------|----------|--------|
| Masterplan | P403CT | Version | |
| Drawings | 4 | Permits | 7 |
| Site No. | 1184 | Plot No. | 109.92 |

PLOT No. -
As Drawn: 113,130
Handed: 134

PROJECT
Barton Road
Thurston
For: Bovis Homes

DRAWING
House Type Planning Drawing
P403CT

| SCALE | SHEET | AUTHOR | CHKD |
|-------|-------|----------|-------|
| 1:100 | @ A3 | 14-03-16 | JC IR |

JOB NO. DRAWING NO. REV
 BTH HT_P403CT-1-PE A

CLIENT REF.
 Bovis Homes



Historic England

EAST OF ENGLAND OFFICE

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

Direct Dial: 01223 582738

Our ref: P00538167

21 November 2016

Dear Mr Platt

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015

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

Thank you for your letter of 18 November 2016 notifying Historic England of the application for listed building consent/planning permission relating to the above site. On the basis of the information provided, **we do not consider that it is necessary for this application to be notified to Historic England** 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 if there are other reasons for seeking the advice of Historic England, we would be grateful if you could explain your request. Please do not hesitate to telephone me if you would like to discuss this application or the notification procedures in general.

We will retain the application for four weeks from the date of this letter. Thereafter we will dispose of the papers if we do not hear from you.

Yours sincerely

Clare Campbell
Principal Inspector of Historic Buildings and Areas
E-mail: clare.campbell@HistoricEngland.org.uk

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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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



Historic England

EAST OF ENGLAND OFFICE

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

Applications for planning permission

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

Consultation:

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

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

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

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

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

Notification:

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

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

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

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

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

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

Applications for listed building consent

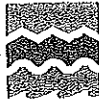


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Telephone 01223 582749
HistoricEngland.org.uk



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Historic England

EAST OF ENGLAND OFFICE

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

Notification:

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

(relevant works means:

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

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

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

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

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

Historic England
15 April 2015

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

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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 21 November 2016 13:54
To: Planning Admin
Subject: 4386/16 Consultation response FAO James Platt

Dear James

Application ref: 4386/16
Our ref: 201789

Natural England has no comments to make on this application.

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.

Yours faithfully

Jacqui Salt
Natural England
Consultation Service
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

From: RM Floods Planning
Sent: 21 November 2016 14:26
To: Planning Admin
Cc: James Platt
Subject: 2016-11-21 JS reply Land on the west side of Barton Road, Thurston IP31 3NT 4386/16

Suffolk County Council, Flood & Water Management can make the following Initial comment

FRA has failed to highlight the historical flooding to properties Heather Close and Furze Close, as well as the predicted flood risk to properties adjacent to Barton Rd.

The use of infiltration as the primary method of disposal of surface water is welcomed.

This however is the only viable surface water drainage strategy for the proposed development and only four trial pits have been dug and tested for the site, which whilst gives an indication that infiltration is likely to work in some areas, isn't definitive at this stage. We would like to see a location plan of the trial pits and would welcome additional infiltration tests to be carried out.

As this is a full application a full detailed design of the surface water drainage system (including these components) is required to be submitted with the application.

Details of our requirements can be found on the [Suffolk CC local SuDs guidance](#).

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

From: Nathan Pittam
Sent: 22 November 2016 11:14
To: Planning Admin
Subject: 4386/16/FUL. EH - Land Contamination.

M3 : 186849

4386/16/FUL. EH - Land Contamination.

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

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

Many thanks for your request for comments in relation to the above application. I have reviewed the report provided that was authored by the Nott Group (ref . 72427/R/001) dated 23rd 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
t: 01449 724715
m: 07769 566988
e: Nathan.pittam@babberghmidsuffolk.gov.uk
w: www.babergh.gov.uk www.midsuffolk.gov.uk

Consultee Comments for application 4386/16

Application Summary

Application Number: 4386/16

Address: 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

Case Officer: James Platt

Consultee Details

Name: Mr Robert Boardman (Stowmarket Ramblers)

Address: 8 Gardeners Walk, Elmswell, Bury St Edmunds IP30 9ET

Email: bob@gardeners8.plus.com

On Behalf Of: Ramblers Association - Bob Boardman (temp cover)

Comments

I have viewed these plans and as there appears to be no public footpaths adjacent or through this site I do not have any comments or observations to make.

From: David Pizzey
Sent: 24 November 2016 12:00
To: James Platt
Cc: Planning Admin
Subject: 4386/16 Land on the west side of Barton Road, Thurston.

James

As this site is currently an arable field there are relatively few arboricultural issues relating to this proposal. However, a couple of matters that require addressing, namely –

- The necessity to remove the well-established hawthorn hedge to the site frontage. This would help soften and integrate any development within the local landscape and should be retained if at all possible. I presume removal is a highways visibility requirement?
- Plot 1 is likely to be significantly dominated by the important Beech tree T4 (located off-site) due to proximity, scale and orientation. It would be beneficial to re-design this area of layout in order to improve the relationship between the development and this important tree in order to help avoid future pressure for pruning and/or removal.

Notwithstanding these concerns I have no objections in principle to this application.

Happy to provide further comments if/when required.

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzey@babberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils - Working Together

Rights of Way and Access
Resource Management, Suffolk County **From:** RM PROW Planning
Sent: 30 November 2016 11:12
To: Planning Admin
Subject: RE: Consultation on Planning Application 4386/16

For The Attention Of: James Platt

Rights of Way Response

Thank you for your consultation regarding the above planning application.

Please accept this email as confirmation that we have no comments or observations to make in respect of this application affecting any public rights of way.

Please note, there may also be public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

This response does not prejudice any further response from Rights of Way and Access. As a result of anticipated increased use of the public rights of way in the vicinity of the development, we would be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

Regards

Jackie Gillis
Rights of Way Support Officer
Countryside Access Development Team
Council
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

✉ PROWPlanning@suffolk.gov.uk | 🌐 <http://publicrightsofway.onesuffolk.net/> | **Report A Public Right of Way Problem Here**

For great ideas on visiting Suffolk's countryside visit www.discoversuffolk.org.uk

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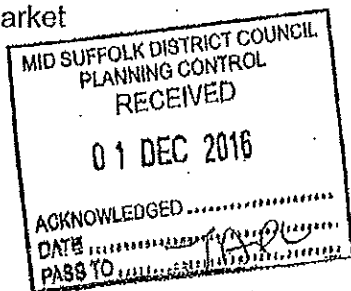
Suffolk Fire and Rescue Service

Mid Suffolk District Council.
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref:
Our Ref: FS/F305633
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 29/11/2016



Dear Sirs

Land on the west side of Barton Road, Thurston, IP31 3NT
Planning Application No: 4386/16+S106

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

Water Supplies

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible at this time to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued/

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Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully



Mrs A Kempen
Water Officer

Enc: PDL1

Copy: Mr L Short, Artisan PPS Ltd, Berwick House, Baylham, Ipswich IP6 8RF
Enc: Sprinkler information

Mid Suffolk District Council
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref:
Our Ref: ENG/AK
Enquires to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 29 November 2016

Planning Ref: 4386/16+S106

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land on the west side of Barton road, Thurston IP31 3NT
DESCRIPTION: 138 dwellings
NO: HYDRANTS POSSIBLY REQUIRED: Required

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

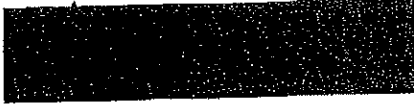
Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued/

OFFICIAL

Should you require any further information or assistance I will be pleased to help.

Yours faithfully



Mrs A Kempen
Water Officer

From: Iain Farquharson
Sent: 05 December 2016 14:16
To: Planning Admin
Subject: 183846. Consultation on Planning Application 4386/16

Our Ref 186846

Dear Sir/Madam

We have reviewed the documentation in relation to sustainability and consider there to be little or no information upon which to make a recommendation. The design and access document submitted does have a sustainability section (5.3) but there are few firm commitments to sustainability levels or standards. As this is a full application information regarding proposed construction standards, maximum water consumption, responsible and or local sourcing, 3rd party accreditation, renewable technology etc is expected.

The applicant is requested to supply such information to enable a recommendation. Until such time the recommendation is refusal.

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

☎ 01449 724878

✉ iain.farquharson@babberghmidsuffolk.gov.uk

From: planningadmin@midsuffolk.gov.uk

From: Judson, Charles [mailto:Charles.Judson@westsuffolk.gov.uk]

Sent: 05 December 2016 09:37

To: Planning Admin

Subject: Planning Application 4386 / 16 - Land on the west side of Barton Road, Thurston, IP31 3NT

Dear Mr Isbell

I write with reference to your letter dated 18th November 2016 consulting St Edmundsbury Borough Council on the above mentioned planning application.

St Edmundsbury Borough Council as Local Planning Authority has no comment to make in respect of the application.

Kind regards

Charles



Consultation Response Pro forma

| | | | | | | | | |
|----------------------------|---|--|-------|----------------|------------|------------------|----------------------------|----------|
| 1 | Application Number | 4386/16 Land on the west side of Barton Road, Thurston, IP31 3NT | | | | | | |
| 2 | Date of Response | 06/12/2016 | | | | | | |
| 3 | Responding Officer | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 60%;">Name:</td> <td>Rebecca Styles</td> </tr> <tr> <td>Job Title:</td> <td>Heritage Officer</td> </tr> <tr> <td>Responding on behalf of...</td> <td>Heritage</td> </tr> </table> | Name: | Rebecca Styles | Job Title: | Heritage Officer | Responding on behalf of... | Heritage |
| Name: | Rebecca Styles | | | | | | | |
| Job Title: | Heritage Officer | | | | | | | |
| Responding on behalf of... | Heritage | | | | | | | |
| 4 | Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • No harm to adjacent designated heritage assets because the proposed scheme, although will develop land which is presently open, will be read in the context of an extension to existing residential development and thus will not erode the rural character of the listed farmsteads in the setting of the application site | | | | | | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | <p>This proposal seeks planning permission for the erection of 138 dwellings to the north of existing residential development on the west of Thurston, north of the train line. The application site includes the final part of the undeveloped former Thurston Heath, and is presently agricultural land. To the north of the application site are open fields, with Barton Road bounded by native hedging, whilst the area to the south of the application site is modern housing estates comprising some hundreds of houses.</p> <p>This development has the potential to impact Grade II listed Mill Farmhouse and Grange Farmhouse to the north of the application site.</p> <p>It is the view of the Heritage team that this proposal will not harm the setting of these heritage assets.</p> <p>Mill Farmhouse is located to the NE of the application site, on the opposite side of the highway, and is set back from Barton Road by over 100m down a farm track, fronted by Mill Farm Cottage, an attractive C18-C19th unlisted dwelling which is a further 100m to the north of the application site.</p> <p>Grange Farmhouse is located closer towards the Barton Road highway, but is also located some 200m to the north of the application site.</p> | | | | | | |

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.

| | | |
|---|--|---|
| | | <p>The proposed scheme, although will develop land which is presently open, will be read in the context of an extension to existing residential development and thus will not erode the rural character of the listed farmsteads in the setting of the application site. Although there will be an impact on the setting of the heritage assets, the listed buildings identified are of such distance from the application site and, when viewed in the context of existing development, it is not considered that this impact will be a harmful one with regard to the setting of the listed buildings.</p> <p>No objection.</p> |
| 6 | <p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p> | |
| 7 | Recommended conditions | |

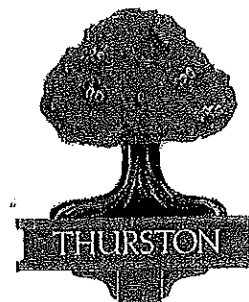
Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed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

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

Tel: 01359 232854

e-mail: info@thurstonparishcouncil.gov.uk



SENT AS AN E-MAIL

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

December 9th 2016

Dear Mr. Isbell,

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

Application Number: 4386/16

The Parish Council wishes to place on record that it objects to the plans as submitted under planning application 4386/16 for the following reasons:

The Parish Council, until the Order for the Neighbourhood Plan is laid, 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 taken into account 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 Meeting held to discuss this application as well as those 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. The Parish Council has received correspondence from the Neighbourhood Plan Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that

they are to be included within its submission. As such a copy of that letter should be read in conjunction with this response.

Reasons for objection:

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 siting 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 proposed development, which shows only 9 single storey dwellings out of the 138 proposed, the proposal fails to take into account 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.

The Parish Council feels 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.

There appears to have been little consideration with regards to the residents of the existing adjacent properties. The proposed development has houses built on the very edge of the boundaries and, by virtue of its scale and density is inappropriate to the site and its surroundings and as such will have 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.

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 is of the opinion that the development is inappropriate in both size, density and style for an area on the very edge of Thurston. The proposed houses are not considered to be in keeping with the existing buildings and is more suited to that of an estate close to a town / village centre, with close access to local facilities. There appears to have been little consideration with regards to the residents of the existing adjacent properties. The proximity of the proposed dwellings to the existing properties on Heather Close, Furze Close, Rowan Way and Marley Close, is considered to be out-of-keeping with not only these but also other developments in the village. The proposed housing layout will result in the loss of privacy for the existing homes and gardens that surround the site. Views to the wider countryside will also be adversely impacted. The Parish Council 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. Of the 90 market properties, 61 are for 4+bed dwellings and the Parish Council fails to see how these are in accordance with 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'.

The Parish Council feels that the proposal has failed to identify the size, type, tenure and range of housing that is required in Thurston and fails to take into account the particular locations and fails to reflect local demand.

3. The Parish Council considers that the application 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 concurs with the concerns raised by the Neighbourhood Plan Team over the plans to have a single entrance road to/from the development directly onto Barton Road with no pedestrian footpath.
5. The Parish Council feels that given the location of the site, a reliance on the private motor car will be generated in order to access amenities and services within both the village and further afield which will also be contrary to the sustainability objectives of Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012) and the NPPF paragraphs 14, 17, 55 and 56 and will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway bridge crossings on Barton Road and Thedwastre Road, entry and exit points onto the A14 and the junction of Thurston Road, Great Barton and A143.

The 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 in order 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. Current data collected from the Parish Council sited Vehicle Activated Sign along Barton Road indicates that between 23rd September and 11th October 2016 there were 21,628 traffic movements travelling East and 13,506 traffic movements travelling West.

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.

6. The Parish Council would also like to recommend that Suffolk County Council be involved in the discussion of future growth in Thurston with reference to the impact that this will have on the provision of education. As mentioned within the letter from Thurston's Neighbourhood Plan Team, both the Thurston Primary Academy School and Thurston Community College are at capacity (taking into account existing planning approvals) and as such this application will ensure that the educational infrastructure is unlikely to meet the demand placed on it by 138 dwellings. As such the Parish Council feels that this application will put a negative strain on the existing infrastructure and as such would be contrary to Policy CS6 of the Core Strategy.

The Parish Council would also like to reiterate the concerns of the Thurston Neighbourhood Plan Team with regards to the speed at which this and potentially other applications have been/are in the process of being submitted for new housing in the village. It is recognised within the village that as a Key Service Centre the village of Thurston will appeal to developers and that a certain amount of growth is desirable and non-objectionable, however the Parish Council is concerned that piecemeal development will have a negative impact on the current infrastructure and that there should be a strict control over new housing proposals and the associated numbers until the general infrastructure of Thurston and the surrounding areas has been given time to absorb new residents and the impacts that this associated growth will have on a rural village.

Yours sincerely,

Victoria S Waples

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



NEIGHBOURHOOD PLAN TEAM

Parish Council Office
New Green Centre
New Green Avenue
Thurston
Suffolk
IP31 3TG
Tel: 01359 232854
e-mail: thurstonnpsg@hotmail.com



Councillor P Robinson
Chair of Thurston Planning Committee
Thurston Parish Council
New Green Centre
Thurston
IP31 3TG

22nd November 2016

Dear Cllr. Robinson,

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

Please be advised that the Thurston Neighbourhood Plan Team have considered this application and have the following general comments to make:

- The Neighbourhood Plan Team would like to state that in accordance with the Parish Council Protocol's for Pre Planning Application Developments – no comments on the suitability of the site for development or how the site performs in relation to others ahead of the site assessment work, have been made during the attendance of representatives from either Artisan Planning or Bovis Homes at any Neighbourhood Plan Meetings.
- Thurston Parish Council is at a relatively advanced stage in preparing a Neighbourhood Plan and whilst the plan has not yet reached the stage of allocating sites or proposing policies, following consultation with the public and land owners and agents on the site assessments carried out during Summer 2016, should be afforded some weight in responding to this application. This site was not submitted as part of the Neighbourhood Plan Process but is known to have been submitted as part of MSDC's Strategic Housing Land Availability Assessment. A request was made in June 2016 for the site to be formally assessed by the Neighbourhood Plan Team and is referred to as Site 19. The results of the assessment on the land submitted by the agent on behalf of Bovis Homes by the Neighbourhood Plan Team has raised a number of issues which the Neighbourhood Plan Team feel are so major and fundamental as to override any acknowledgment of the site's "neutral" assessment. Comments raised by the public following the public consultation on the site assessments have also been incorporated into the process and the revised site assessment overall summary has not changed from that of 'neutral'. A copy of this site assessment is attached to this letter.
- The Neighbourhood Plan Team is disappointed at the speed at which this and another application have been submitted for new housing in the village. There seems to be a general haste to ensure that each development is the first to submit with little regard for the impact that each development will have as a whole on the general infrastructure of Thurston which requires time to evolve and time to absorb new residents and associated growth. There is a general concern that the size of new developments being proposed will result in Thurston losing its 'village feel' and for it to become 'a small town'.

With particular reference to the planning application submitted:

- Generally the Neighbourhood Plan Team feels that the Application shows an unimaginative off the shelf design and fails to show any respect for the fact that it abuts countryside on one side and an existing housing development on the other. It is felt that the allocated formal 'open spaces' are not in keeping with the surrounding area and that the current layout was more in keeping with a high density housing

estate and not that of a rural village beyond the limits of the Built Up Area Boundary. The Team also felt that the inclusion of 2.5 – 3 storey dwellings at this point of the village was not considered to be in-keeping with the general characteristic of a rural village. The Neighbourhood Plan Team felt that there was also a need for better screening around the edge of the site, along the existing road in order to ensure that the new development enhanced and protected the existing natural environment, wildlife networks and biodiversity.

- The Neighbourhood Plan Team is disappointed that within the application submitted there is little evidence to show that the scheme is set to encourage the development of appropriate housing stock that reflects the needs of current and future residents. The Team is concerned that the density is higher than that of surrounding areas and is not in-keeping with that of a rural village. The market housing proposed in this application comprises 90 dwellings of which 81 are for 4+ bedrooms. The majority of those who have responded to the public consultations held by the Neighbourhood Plan Team have indicated that there is a desire to ensure future growth reflects the community wish for starter homes for local first time buyers; bungalows and 1 - 2 bedroom houses.
- The Neighbourhood Plan Team would like to reiterate that, whilst it is generally appreciated within the village that as a Key Service Centre and a village on the A14 corridor with a good rail link there will be growth within the village, there is a preference for this growth to be handled sympathetically and on sites of no more than 50 houses. The Neighbourhood Team would have liked to see the Planning Application draw on this preference and to have divided the site into separate areas using hard and soft landscaping techniques to ensure that the design preserves and enhances the built, natural and historic environment of the local area as well as maintaining and enhancing its distinctive characteristics.
- It is acknowledged in the documents submitted by the applicant that the proposed residential development would result in an increase in the vehicular movements from the site and that given the number of dwellings proposed that this has not been assessed to be at a level that would result in a significant impact upon the local road network that could not be adequately assessed by an appropriate transport assessment.

The Neighbourhood Plan Team feels that given the location of the site little reference has been made to the current road infrastructure and the impact that the development will have on the junctions of Fishwick and Pokeridge Corners for those accessing the A14 via the narrow bridge on Barton Road. It is recognised that both areas have a high proportion of incidences involving more than one vehicle and yet there is only mention of a financial contribution towards the physical improvement works proposed to the Fishwick Corner junction (signing and road marking). As it is expected that direct access to this route will be under the very narrow Railway Bridge, the Neighbourhood Plan would expect further consideration to be given to traffic improvements at this point.

Further to the above, whilst the proposal is positioned to enable traffic generated by the proposal to access the main vehicular routes of the A143 and A14 without passing the site at land South of Norton Road, the Neighbourhood Plan Team feels that there will be a cumulative impact of this and other developments upon the local network and that an Environmental Impact Assessment for both Thurston and Great Barton should have been submitted with the Planning Application.

- It was further agreed that the Neighbourhood Plan Team was concerned that there were no plans to install safe pedestrian footpaths from the site to the existing footpath that leads to shops or amenities and that no reference has been made to the fact that all pavements should be made suitable for motorised buggies nor was there any mention of cycle lane provision.

Although the Transport Assessment Report states that there are footpaths running adjacent to Barton Road, from Mill Lane to Marley Close there is a single footpath on its eastern side and at Marley Close, the footpath crosses the road and runs along the western side of Barton Road, there are no direct safe pedestrian footpaths linking that from Marley Close to the entrance of the site further along Barton Road. The Neighbourhood Plan Team is also concerned that there are no safe pedestrian crossing points along the whole of the route of Barton Road. The plans indicate that the single entrance road to the development will come straight out onto Barton Road with no pedestrian footpath. The route into the village along Barton Road could be made reasonably safe by providing a short pedestrian footpath and a pedestrian crossing to the other side of the road which would then link to the existing footpath to educational establishments or amenities that are access by the crossing of the road.

The Neighbourhood Plan Team is also aware that whilst the centre of the site is within the preferred distance for commuting to school, it is apparent that around 50% of the site will be in excess of this maximum distance. Given that the Transport Assessment Report states that it is recommended that short car trips are substituted for walking (where the journey is under 2 km) and cycling (where the journey is under 5 km) the Neighbourhood Plan Team feels that this distance will encourage as

opposed to reduce the use of the car thereby increasing the negative impact that this development will have on the local road network.

- The application states that although the site is within the predominately rural district of Mid-Suffolk, Thurston has links by both bus and rail to Bury St Edmunds and Stowmarket and rail to Cambridge and Ipswich that provide onward links to rural and national services via their Bus and Railway Station(s). Whilst the Neighbourhood Plan Team accepts this fact, there is concern that there has been little or no assessment of the impact on the railway station that this and other developments will have and the fact that car parking at the station is already an issue.
- The Neighbourhood Plan Team would also like to draw to the Parish Council's attention the impact that such a development will have on the education provision within Thurston. The Team has been informed by Suffolk County Council that Thurston Church of England Primary Academy is currently at capacity (this takes into account current housing commitments only) and that the consequence that any future growth will have must include detailed discussions about infrastructure mitigation. It is also noted that Thurston Community College is also at capacity and that it is unlikely that the school will be supported to grow much bigger than it is now: Given that 200 additional homes by 2031 will yield 50 Primary Pupil Places; 36 Secondary Pupil Places and 8 Secondary 16+ Places the Neighbourhood Plan Team has concerns that this provision will not be met locally and that there will be a need for pupils to be 'bussed' outside of the village. This unsustainable situation will also have a negative impact on traffic, bus stops and road congestion within the village.

Overall the Neighbourhood Plan Team would ask the Parish Council to take into account its concerns for this application on this site for the following reasons:

- road safety with particular emphasis on the junctions of Thurston Road (Great Barton) and the A143
- road safety with particular emphasis on the junctions of Fishwick and Pokeridge Corner for those accessing the A14 via the narrow bridge on Barton Road
- pedestrian safety as there are no safe crossing points
- loss of character of the village
- development inappropriate to that of land abutting the countryside
- concern for the amount of development on the site
- village infrastructure particularly provision of education and traffic
- type and density of housing mix
- cost of affordable homes for local residents

In summary, whilst the Neighbourhood Plan Team recognises the need for future development within Thurston, it does not support the submission in its present guise for the concerns outlined above.

Yours faithfully,

Victoria S Waples

Victoria S Waples, BA (Hons), CiLCA
Secretary to Thurston Neighbourhood Plan Team

Copy to:
Corporate Manager – Development Management
MSDC
131 High Street
Needham Market
Suffolk
IP6 8DL

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



12 December 2016

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

By email only

Hi James

Application: 4386/16

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.

I have no objections subject to conditions and securing offsite skylark mitigation eg nest plots on arable land nearby.

1. The site and ecology

The site contains Priority habitat – hedgerow – and is likely to support Priority species – bats, amphibians, reptiles, hare, skylark and potentially hedgehog – as well as an assemblage of breeding birds.

2. The information provided by the applicant

2.1 I have reviewed the ecological material submitted - the (Preliminary) Ecological Appraisal (Mill House Ecology October 2015). I am satisfied that this report is based on all necessary field surveys with data being adequate and up to date and supported by adequate and appropriate desk studies. No further surveys are considered necessary before determination of this application.

2.2 The report provides a summary of all species and habitats likely to be affected and describes the likely impacts. It also explains how proposed mitigation will address likely effects and how such measures will be secured through planning conditions. However an assessment of likely impacts on skylark is also necessary to inform reasonable mitigation measures to be secured offsite.

2.3 Survey and assessment of biodiversity features has been carried out by suitably qualified ecologists at the appropriate time of year, using appropriate methodologies and the report written



in accordance with CIEEM report writing guidelines. There is recognition of the limitation that the site visit carried out in September 2015, imposed on breeding birds and the sugar beet crop in 2015 had on the likelihood of nesting or foraging skylarks has been acknowledged.

3. Likely impacts of development:

3.1 Adverse impacts from the proposed development upon Priority habitats, as well as Protected and Priority species, have been identified and these will be mitigated in line with relevant wildlife legislation and planning policy.

However there is an additional requirement for offsite skylark mitigation eg nest plots on arable land nearby similar to agri-environment option AB4 skylark plots, which will need to be secured by legal agreement.

3.2 Timing of operations eg clearance of hedgerow for access will be required to avoid anyone connected with project from committing an offence of disturbing nesting birds. Section 4 (Recommendations) of the submitted Ecological Appraisal (Mill House Ecology Oct 2015) will need to be secured by planning condition.

3.3 Amphibians and reptiles

Subject to a condition to implement the mitigation measures contained in the submitted Ecological Appraisal, I am satisfied that will be no significant adverse impacts on Gt crested newt, a European Protected Species, and other amphibians and reptiles.

3.4 Bats

Through the retention of boundary trees and biodiversity improvements, the development of the application site is considered unlikely to result in significant habitat loss effects on foraging /commuting bats, provided a sensitive lighting scheme is implemented. The lighting design will therefore need to minimise impacts on bats to avoid deliberate disturbance to these European Protected Species. A detailed & sensitive Lighting scheme will need to ensure that the vegetated features on the site are not illuminated to a level greater than 1 lux. This is required in order to adequately minimise the impact of the development on bats.

I am satisfied that will be no significant adverse impacts on these European Protected Species, subject to appropriate conditions to protect the retained trees and hedgerows (and to control exterior lighting), which are important bat foraging and commuting routes.

3.5 Breeding birds

Subject to appropriate conditions being attached to any consent to secure the mitigation measures as recommended in the submitted Ecological Appraisal, particularly during construction, I am satisfied that will be no significant adverse impacts on nesting birds.

3.6 Priority habitat - hedgerow

The loss of a section of roadside hedgerow to provide site access will require replacement planting within the development and appropriate ongoing management to ensure ecological functionality for this Priority habitat.



In accordance with CIEEM report writing guidelines. There is recognition of the limitation that the site visit carried out in September 2015, imposed on breeding birds and the sugar beet crop in 2015 had on the likelihood of nesting or foraging skylarks has been acknowledged.

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3.6 Priority habitat - hedgerow

The loss of a section of roadside hedgerow to provide site access will require replacement planting within the development and appropriate ongoing management to ensure ecological functionality for this Priority habitat.



3.7 Priority species

In addition to mitigation during construction, confirmation that all the fencing within the development is hedgehog-friendly as mitigation for loss of connectivity for this Priority species.

I am satisfied therefore that there will be no significant adverse impacts on the Priority Species likely to be present on site, subject to appropriate conditions for clearance and hedgehog friendly fencing throughout the development.

4 Biodiversity enhancements

Biodiversity enhancements should be incorporated into the design of the development in accordance and I am satisfied that the enhancement recommendations set out in the submitted Ecological Appraisal are appropriate and reasonable.

However I would welcome a discussion about an additional enhancement opportunity, to fit integrated bird boxes for swift, a Priority species, into the building design.

5 Recommendations

The mitigation measures identified in the Ecological Appraisal (Mill House Ecology Oct 2015) 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.

I would also expect the preparation of a long term Landscape & Ecological Management Plan (LEMP), prior to 1st occupation. Submission for approval and implementation of these plans in full 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 Appraisal (Mill House Ecology, Oct 2015) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECOW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

II. PRIOR TO COMMENCEMENT: SKYLARK MITIGATION STRATEGY

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

III. PRIOR TO SLAB LEVEL: BIODIVERSITY ENHANCEMENTS

"All ecological measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal (Mill House Ecology, Oct 2015), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination"



IV. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

- a. *"Prior to occupation, a Landscape and Ecological Management Plan (LEMP) for the landscape buffer and habitats on-site shall be submitted to and be approved in writing by the local planning authority. The content of the LEMP, shall include the following:*
- a) Description and evaluation of the features to be managed and enhanced*
 - b) Aims and objectives of management*
 - c) Appropriate management options for achieving aims and objectives*
 - d) Prescriptions for management actions*
 - e) Preparation of a work schedule (including annual work plan capable of being rolled forward over a five year period)*
 - f) Details of the body or organisation responsible for implementation of the plan*
 - g) Ongoing monitoring and remedial measures*
- b. *The LEMP shall also include details of the legal and funding mechanisms by which the long term implementation of the plan will be secured by the developer with the management body responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."*

V. 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."

6. Reasons

6.1 The applicant has provided sufficient information to allow the LPA to discharge its duties under the UK Habitats Regulations.

6.2 The applicant has provided sufficient information to allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended.

6.3 The applicant has provided sufficient information to allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority habitats & species)



7 Conclusion

I agree that the works will result in impacts on important ecological features including Priority hedgerow habitat and could impact on Protected and Priority species. However with mitigation secured, these 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.

I have made these recommendations in order to minimise the impact of the proposal on ecology and having due regard for the NPPF and Policy CS5, as well as the statutory obligations of the Local Planning Authority.

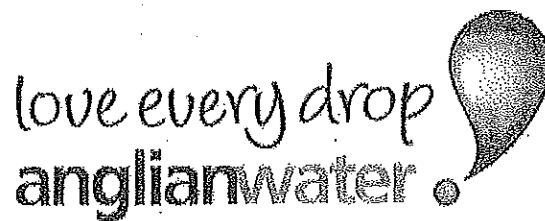
Please contact me with any queries.

Best wishes

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

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.



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

AW Reference: 00018541
Local Planning Authority: Mid Suffolk District
Site: Land on the west side of Barton Road,
Thurston
Proposal: Creation of 138 x C3 Dwellings
Planning Application: 4386/16

Prepared by: Mark Rhodes

Date: 13 December 2016

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 Development may lead to an unacceptable risk of flooding downstream. The drainage strategy prepared in consultation with Anglian Water suggested connection should be made via a gravity regime. However the FRA submitted with this application states that a pumped regime will be required to drain some foul 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 will 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.

From: Philippa Stroud
Sent: 09 December 2016 10:30
To: James Platt
Subject: 4386/16/FUL Land on the west side of Barton Road, Thurston - Other Issues

WK/186847

Dear James,

Ref: 4386/16/FUL EH – Other Issues
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 the opportunity to comment on the above planning application.

I note that a foul water pumping station will be necessary and that space is reserved for this in the north-east corner of the application site. Could the applicant be asked to provide further details please, regarding its noise specification, mitigation measures etc., calculated to the nearest residential boundary and for us to be re-consulted when this information becomes available.

Regards,

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

Telephone: 01449 724724

Email: Philippa.Stroud@baberghmidsuffolk.gov.uk
Websites: www.babergh.gov.uk www.midsuffolk.gov.uk



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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk


Council's Reference: 4386/16

Referring to the planning application referenced above, dated 18 November 2016, application for the erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space, Land on the west side of Barton Road, Thurston, IP31 3NT, 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.¹

¹ Where relevant, further information will be provided within Annex A.

| | |
|---|--------------------------------|
| Signature:  | Date: 12 December 2016 |
| Name: David Abbott | Position: Asset Manager |
| Highways England: Woodlands, Manton Lane Bedford MK41 7LW | |
| david.abbott@highwaysengland.co.uk | |



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

Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

14/12/2016

Dear James,

RE: 4386/16 Erection of 138 dwellings and associated infrastructure. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Land on the west side of Barton Road, Thurston, IP31 3NT Thurston

Thank you for sending us details of this application. We have read the ecological survey report (Mill House Ecology, October 2015) and note the findings of the consultant. We have the following comments on this proposal:

Hedgerows (UK and Suffolk Priority Habitat)

The ecological survey report identifies that the hedgerow on the eastern boundary of the site, alongside Barton Road, is a native species rich hedge which is likely to provide foraging and commuting habitat for bats and nesting habitat for birds, including UK and Suffolk Priority species such as dunnock and yellowhammer. Hedgerows are also a UK and Suffolk Priority habitat. Whilst the ecological survey report states that only a small section of this hedgerow will be removed to create a vehicular access, the Tree Constraints plan (drawing number LSDP 11341-01) shows the whole length of hedgerow being removed. This would represent a considerable loss of a Priority habitat, contrary to the requirements of National Planning Policy Framework (NPPF) and the Mid Suffolk Core Strategy Development Plan Document.

Any development should retain all existing semi-natural habitats, suitably buffer them and ensure that they are managed to maximise their biodiversity value in the long term.

Protected and/or UK and Suffolk Priority Species

Bats

The ecological survey report identifies that boundaries of the site provided suitable foraging and commuting habitat for bats and that some offsite mature trees may provide suitable roosting habitat. The report recommends that a sensitive lighting strategy is implemented in order to maintain these foraging and commuting opportunities. We recommend that an external lighting strategy and plan is produced to demonstrate that the proposed development can maintain these features as 'dark corridors', no light spill of greater than 1 lux (equivalent to bright moonlight) should be able to reach retained (and new) habitats.

Nesting Birds

The proposed removal of the eastern hedgerow will result in the loss of habitat for nesting birds, possibly including those designated as UK and Suffolk Priority species. As recognised in the ecological survey report, the site also offers potential nesting habitat for skylark (dependent on the crop rotation). Skylark are also a UK and Suffolk Priority species under Section 41 of the Natural Environment and Rural Communities (NERC)

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Registered charity no 282777

Act (2006). Unmitigated, the proposal will therefore result in a net loss of habitat suitable for nesting birds, including this designated as UK and Suffolk Priority species.

The site is also likely to support brown hares and hedgehogs, both of which are UK and Suffolk Priority species. Mitigation for impacts on these species should therefore be secured, should consent be granted.

Conclusion

As presented the proposed development would result in the loss of UK and Suffolk Priority habitat and adverse impacts on UK and Suffolk Priority species. We therefore consider that this is contrary to the requirements of the National Planning Policy Framework (NPPF) and Mid Suffolk DC's Core Strategy DPD. Consent should not be granted for development contrary to national and local planning policy.

Notwithstanding the above, should it be considered that development in this location is acceptable, we request that the recommendations made within the ecological survey report are implemented in full, via a condition of planning consent, should permission be granted. Development also should seek opportunities to enhance biodiversity wherever possible on this site. This should include ensuring that all greenspaces are managed to maximise their biodiversity value in the long term.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

Jill Crighton
Conservation Planner

From: Linda Harley [mailto:harley.parish@btinternet.com]
Sent: 14 December 2016 10:45
To: Planning Admin
Subject: Response to Consultation 4386/16

Good Morning

Gt Barton Parish Council were asked to comment on the following application as it directly borders their Parish. Unfortunately, due to illness our comments are slightly late but we hope you will still take them into consideration.

Erection of 138 dwellings on land on the West Side of Barton Road, Thurston -
4386/16

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.

Please contact me if you have any questions. Many thanks,

Linda

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

Telephone: 01284 787777



Consultation Response Pro forma

| | | | |
|----------|---|--|--------------------------|
| 1 | Application Number | 4386/16 – Erection of 138 dwellings – Land of the west side of Barton Road - Thurston | |
| 2 | Date of Response | 19 th December 2016 | |
| 3 | Responding Officer | Name: | Louise Barker |
| | | Job Title: | Housing Enabling Officer |
| | | Responding on behalf of... | Strategic Planning |
| 4 | Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | No objection | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | <div style="border: 1px solid black; padding: 5px;"> <p>This is a development proposal for 138 residential dwellings and triggers an affordable housing provision requirement of 35% under altered policy H4 of the Mid Suffolk Local Plan (on development proposals of 5 units and over outside of Stowmarket and Needham Market) equating to 48 affordable housing units.</p> </div> <p>1. Housing Need Information:</p> <p>1.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2012, confirms a continuing need for housing across all tenures and a growing need for affordable housing.</p> <p>1.2 The 2012 SHMA indicates that in Mid Suffolk there is a need for 229 new affordable homes per annum. The Survey also confirmed that an appropriate affordable housing tenure split for the District is 75% rented and 25% low cost home ownership tenure accommodation.</p> | |

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.

| | | |
|--|--|--|
| | | <p>1.3 Furthermore the 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are a key driver for this increased demand for smaller homes.</p> <p>1.4 With an aging population, both nationally and locally new homes should, wherever possible, be built to Lifetime-Homes standards and this can include houses, apartments and bungalows.</p> <p>1.5 The Suffolk Housing Needs Survey also confirms that there is strong demand for one and two bedroom flats/apartments and houses. Developers should consider flats/apartments that are well specified with good size rooms to encourage downsizing amongst older people, provided these are in the right location for easy access to facilities. There is also a demand for smaller terraced and semi-detached houses suitable for all age groups and with two or three bedrooms.</p> <p>1.6 Broadband and satellite facilities as part of the design for all tenures should be standard to support.</p> <p>1.7 All new properties need to have high levels of energy efficiency.</p> <p>1.8 Studio and bedsit style accommodation is not in high demand.</p> |
|--|--|--|

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| | |
|--|--|
| | <p>2. Choice Based Lettings Information:</p> <p>2.1 The Council's Choice Based Lettings system currently has circa 1000 applicants registered for housing in Mid Suffolk. Currently there are circa 25 applicants registered with a local connection to Thurston. This site is a S106 planning obligation site therefore affordable housing will be to meet district wide need hence the 1003 applicants registered is the figure to note.</p> <p>2.2 The district wide majority need on the housing register is for 1 and 2 bedrooms. There is also a smaller element requiring 3+ bedroom properties.</p> <p>3. Recommended Affordable Housing Mix:</p> <p>3.1 It is noted that the design and access statement with this application proposes 35% affordable housing which is welcomed. 35% affordable housing on this proposal based on 138 units equates to 48 AH units.</p> <p>3.2 Based on the above information, the following mix is recommended:</p> <p>Affordable Rent Tenancy = 36 units as follows:</p> <ul style="list-style-type: none"> • 10 x 1b 2p flats @ 50sqm • 2 x 1b 2p bungalows @ 50sqm • 2 x 2b 4p bungalows @ 70sqm • 16 x 2b 4p houses @ 79sqm • 5 x 3b 6p houses @ 102sqm • 1 x 4b x 7p house @ 115sqm <p>Shared Ownership = 12 units as follows:</p> <ul style="list-style-type: none"> • 8 x 2bed 4p houses @ 79sqm • 4 x 3bed 6p person houses @ 102sqm <p>(Recommended nationally described space standards.)</p> |
|--|--|

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| | |
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| | <p>4. Other requirements for affordable homes:</p> <ul style="list-style-type: none"> • Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards • The council is granted 100% nomination rights to all the affordable units in perpetuity • The Shared Ownership properties must have an 80% stair casing bar. • The Council will not support a bid for Homes, & Communities Agency grant funding on the affordable homes delivered as part of an open market development. Therefore the affordable units on that part of the site must be delivered grant free • The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice • On larger sites the affordable housing should not be placed in groups of more than 15 units • Adequate parking provision is made for the affordable housing units • It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see www.midsuffolk.gov.uk under Housing and Affordable Housing for full details. • AH dwellings must be tenure blind. |
|--|---|

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| | | |
|---|--|---|
| | | <p>5. Open Market Homes Mix:</p> <ul style="list-style-type: none"> • There is a strong need for homes more suited to the over 55 age bracket within the district and supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. • It is noted that a number of bungalows/chalet bungalows are proposed and this is welcomed. A small number of 2 bed flats would also be recommended. • The 2011 census shows 85.1% under occupied households in Thurston. (ONS 2011 Census:QS412EW). • There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities. Hence we would be looking for less 4 bed houses and a greater amount of 2 beds than are proposed. • It is recommended that there is a broader mix of open market housing on this scheme incorporating the majority of units as 1, 2 and 3 bedroom with a much smaller element of 4+bedrooms to reflect the above information. |
| 6 | <p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p> | |

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.

| | | |
|---|-------------------------------|--|
| 7 | Recommended conditions | |
|---|-------------------------------|--|

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Midlands & East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF

Email address: kerryharding@nhs.net

Telephone Number – 0113 824 9111

Your Ref: 16/4386

Our Ref: NHSE/MIDS/16/4386/KH

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

07 December 2016

Dear Sirs,

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

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' 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 138 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 catchment (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.

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 ¹ | NIA (m ²) ² | Capacity ³ | Spare Capacity (NIA m ²) ⁴ |
|--------------------|---------------------------------|------------------------------------|-----------------------|---|
| Mount Farm Surgery | 12,244 | 768.40 | 11,206 | -71.19 |
| Total | 12,244 | 768.40 | 11,206 | -71.19 |

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 120m² 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.

High quality care for all, now and for future generations

Yours faithfully



Kerry Harding
Estates Advisor

High quality care for all, now and for future generations

Your ref: 4386/16
Our ref: 00046430
Date: 07 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

James Platt
Planning Department
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

Dear James,

Re: Thurston, land West of Barton Road - Erection of 138 dwellings

There are now five live applications for planning permission on sites in Thurston. In view of these applications which add up to over 800 dwellings it is clear that the County Council needs to consider the cumulative impact implications on highways and education infrastructure in the locality.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC

Your ref: 4386/16
Our ref: Thurston – land west of
Barton Road 00046430
Date: 20 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Mr James Platt,
Planning Department,
Mid Suffolk District Council,
Council Offices,
131 High Street,
Needham Market,
Ipswich,
IP6 8DL

Dear James,

Thurston: land west 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.

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £29,808 towards libraries provision.

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. The County Council's view is that appropriate mitigation from each of the 'live' planning applications should 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 in which planning obligations are sought by Suffolk County Council 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 123 Infrastructure 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

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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 seen as 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 21 January 2016 and started charging CIL on planning permissions granted from 11 April 2016. Mid Suffolk are required by Regulation 123 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 adopted 123 list.

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

- 1. Education.** NPPF paragraph 72 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 | Capacity | | | | Actual/Forecast Pupil Numbers | | | | |
|--|-----------|-------|---------|-------|-------------------------------|---------|---------|---------|---------|
| | Permanent | 98% | Special | Total | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 |
| Thurston CE Academy | 210 | 200 | | 200 | 196 | 211 | 212 | 208 | 208 |
| Ixworth Free School (11 - 16) | 597 | 587 | 0 | 597 | 271 | 300 | 342 | 360 | 344 |
| Thurston Community College (11 - 16) | 1500 | 1425 | 0 | 1,425 | 1,561 | 1,599 | 1,585 | 1,547 | 1,547 |
| 11-16 total places | 2097 | 1992 | | 1992 | 1,832 | 1,899 | 1,827 | 1,807 | 1,891 |
| Thurston Community College (with Sixth Form) | 1940 | 1,843 | 0 | 1,843 | 1,828 | 1,840 | 1,862 | 1,872 | 1,868 |

| School level | Minimum pupil yield: | Required: |
|---------------------------------|----------------------|-----------|
| Primary school age range, 5-11: | 29 | 29 |
| High school age range, 11-16: | 20 | 0 |
| Sixth school age range, 16+: | 4 | 0 |

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 a number of 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 seen as a far from ideal strategy and should only be considered for a very temporary period because there are a number of 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.

Regarding out of catchment schools, major studies have shown that each transfer can result in a 6 month dip in standards as a minimum. 40% will eventually recover but 12% of pupils suffer long term negative effects. 2-tier pupils always out-performed 3-tier pupils at GCSE in the past and whilst the additional transfer isn't the only reason it does have a negative effect.

The Policy Development Panel for School Organisation Review recommended at the start that any proposal should:

- 1) Ensure a single line of accountability for each key stage and
- 2) Minimise the number of points of transfer from one school to another within the statutory age range

This was the reason why the final decision was made to close the middle schools.

In addition to the above a lot of work is involved in transferring a pupil cohort from one school to another. There's the preparation and handover of pupil records to ensure the new school is made aware of each child's history, progress, health, needs and other agencies' involvement etc... to ensure continuity of their learning. There's also the pastoral care of all children so they

feel comfortable with the change. Vulnerable and looked after children and those with SEN and behaviour difficulties and their parents have to be supported particularly sensitively and this could involve anything from regular visits to the school to staff working across the two schools for a period of time.

Due to the current uncertainty over the scale, location and distribution of housing growth in the Thurston locality it is not clear at this point in time 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 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
- £6.9m/420places = £16,429 per pupil place
- From 138 dwellings it is forecast that 29 primary age pupils will arise
- Therefore 29 pupils x £16,429 per place = **£476,441 (2016/17 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 places x £1,294 per place = **£37,526.**

At present two planning applications (under references 5070/16 and 4963/16)

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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 is allowed to 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 or not to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would

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

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction commencing on the new school early on. The costs between renting and buying are comparative. Should developers prefer to rent and pay for installation and removal costs this is acceptable to SCC, and an ongoing rental charge/obligation can be included in the Section 106 agreement. 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 = $\frac{£250,000}{60} = £4,167$
- Primary age pupils arising from this site is 29
- Proportionate contribution towards temporary classroom is 29 pupils x £4,167 per place = £120,843

The temporary classroom cost of £250k will be apportioned across all developments that secure planning permission, based on dwelling occupations/pupils arising from each scheme up to the maximum of £250k/60 pupils. The planning obligation will need to be worded in such a way for each scheme that the maximum they will pay will be based on total pupils arising and/or limited to the 60 places. In theory the 5 schemes could proportionately split the £250k cost but have a dwelling occupancy restriction once the 60 places have been used up; or any combination of circumstances which may arise.

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 is in the process of being analysed, but the initial view is that in due course 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.** Education for early years should be considered as part of addressing the requirements of 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. The Childcare Act in Section 7 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 Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

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. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

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

- £500,000 construction cost (including land as collocated with the new primary school) for a new 60 place setting
- £500,000/60 early years pupils = £8,333 per place
- From 138 dwellings there is the need for 14 additional places

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- 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.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and 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 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Steve Merry/Christopher Fish of Suffolk County Highway Network Management.

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

- 5. Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, 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 Mid Suffolk housing team to identify local housing needs.
- 6. 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

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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:

"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 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.

- 7. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

- 8. Superfast broadband.** 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 impacting 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.

- 9. Legal costs.** SCC will require an undertaking from the applicant for the

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reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

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

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Strategic Development – Resource Management

cc Neil McManus, SCC
Iain Maxwell, SCC
Peter Robinson, Chairman - Thurston Parish Council
Christine Thurlow, MSDC
Steve Merry, SCC

From: Iain Farquharson
Sent: 28 February 2017 17:24
To: Leslie Short <leslie@artisan-pps.co.uk>
Cc: James Platt <James.Platt@baberghmidsuffolk.gov.uk>
Subject: M3 186846: Bovis Barton Road Thurston application ref. 4386/16

Hi Leslie

Thank you for your response however I do not believe all of my points have been addressed, please see additional comments based on your latest submission below. Could you revisit your report please.

4.ii additional energy savings. The content of this paragraph is just compliance with the domestic heating compliance guide and a commitment to use low energy lighting. The domestic guide is a common standard level and not an additional saving. Low energy lighting is also the standard position since the phasing out of inefficient lamps.

4i / 4ii The table of U values and psi values were used in the Soham example demonstrating a saving in emissions is possible

6.ii Part G calculation. Please provide this calculation as mentioned in the text.
Calculation received however it demonstrates 107.2 ltrs not the 105 mentioned in the text

6.v Materials. This refers to historic site performance. Is The Code being used at this site? If no how will the sustainability of the materials be demonstrated?

This has not been addressed, still referring to historic performance. Will The Code certification be used on this site? If not how will the sustainability of the materials be demonstrated?

6vi. What is 'Sustainability- The Mid Suffolk Approach'?
Clarification received

6vi Why is it difficult to accommodate renewable energy due to the landscape?, what 'aesthetics' will affect the landscape?

Still no justification as to why it is *difficult* to accommodate renewables at this site. This is a flat, open field anything is possible. The attempted justification that 'there are no visible PV panels on neighbouring properties' is not a valid reason.

6vii Please confirm the source of the 80% claim
The product found from the link provided provides constant light during dusk til dawn plus an additional large 100w of light when the PIR sensor is triggered. Therefore there is constant light pollution plus large energy use when triggered. LED lamps can provide the equivalent of 100w with a 10w unit. The PIR sensors purpose is to remove the need for constant light. This is not considered to be in line with the energy and carbon saving properties proposed.

6vii If there are 100% efficient light fittings throughout what is the reference to landings and corridors?
Explanation provided.

at 6vii...this is a generalisation again making reference to the Mid Suffolk Approach which acknowledges at para 3.7 that the environmental sensitivity and that of the rural local landscape in particular is such that large scale renewable energy generation or even other smaller scale forms, would be difficult to successfully assimilate into the landscape.

Para 3.7 specifically makes reference to large-scale, on-shore renewable energy generation. The proposals in this application are not large scale energy generation. They are small, localised (to the property) and definitely not difficult to assimilate into the landscape

7. Please clarify; what is the definition of 'if needed' in relation to the waste water heat recovery unit
Explanation provided

7. Please expand on the reasoning for not using PV 'due to local landscape characteristics'
See 6vi

8vi Renewable technologies are eluded to in this section but the whole report is geared towards fabric first, what technologies might be used and what circumstances?
Explanation received

8vii The development can attain exemplar status by the inclusion of WWHR contradicts 6viii which already claims exemplar status. The definition of exemplar is a perfect / shining example so good that it should be copied. The proposals are considered typical not exemplar.

8vii This section contradicts section 8vi
Clarification provided

8viii What measures are included to minimise unregulated energy use?

The offer to reduce unregulated energy use amounts to 1. Outside light which is not considered as energy saving as per note 6vii 2. 100% low energy fittings when 75% is required by Part L and generally speaking low energy fittings are the only style that can be purchased anyway. 3. An energy monitor which does not save any energy merely tells the occupant what is being consumed. The saving from an energy meter is minimal: 'Government estimates put the average saving at £23 a year by 2020 on combined gas and electricity bills'

https://www.ofgem.gov.uk/sites/default/files/docs/2011/03/consumersmartmeteringfs_0.pdf

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

☎ 01449 724878

✉ iain.farquharson@babberghmidsuffolk.gov.uk

Your ref: 4386/16
Our ref: Thurston – land west of Barton Road
00046430
Date: 05 March 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Dylan,

Thurston: land west of Barton Road

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.

The County Council responded by way of letter dated 20 February 2017 which is still relevant. However this letter provides an update on two issues, namely:

1. Temporary classroom. Whilst these mitigation requirements may still arise in this respect, the District Council's published 123 List contains 'provision of primary school places at existing schools'. So whilst the cost of the temporary classroom will therefore fall to CIL the District will need to report this to committee as a direct cost consequence arising if planning permission is granted and the scheme is built out. On this basis SCC will make a future CIL funding bid to Mid Suffolk District Council.
2. Suggested planning condition restricting dwelling occupations linked with surplus places available at the catchment village primary school. This is a matter for the District to take a view on when considering the application of the 6 tests set out in the National Planning Policy Framework.

Yours sincerely,



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

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
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12 December 2016

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

By email only

Hi James

Application: 4386/16

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.

I have no objections subject to conditions and securing offsite skylark mitigation eg nest plots on arable land nearby.

1. The site and ecology

The site contains Priority habitat – hedgerow – and is likely to support Priority species – bats, amphibians, reptiles, hare, skylark and potentially hedgehog – as well as an assemblage of breeding birds.

2. The information provided by the applicant

2.1 I have reviewed the ecological material submitted - the (Preliminary) Ecological Appraisal (Mill House Ecology October 2015). I am satisfied that this report is based on all necessary field surveys with data being adequate and up to date and supported by adequate and appropriate desk studies. No further surveys are considered necessary before determination of this application.

2.2 The report provides a summary of all species and habitats likely to be affected and describes the likely impacts. It also explains how proposed mitigation will address likely effects and how such measures will be secured through planning conditions. However an assessment of likely impacts on skylark is also necessary to inform reasonable mitigation measures to be secured offsite.

2.3 Survey and assessment of biodiversity features has been carried out by suitably qualified ecologists at the appropriate time of year, using appropriate methodologies and the report written



in accordance with CIEEM report writing guidelines. There is recognition of the limitation that the site visit carried out in September 2015, imposed on breeding birds and the sugar beet crop in 2015 had on the likelihood of nesting or foraging skylarks has been acknowledged.

3. Likely impacts of development:

3.1 Adverse impacts from the proposed development upon Priority habitats, as well as Protected and Priority species, have been identified and these will be mitigated in line with relevant wildlife legislation and planning policy.

However there is an additional requirement for offsite skylark mitigation eg nest plots on arable land nearby similar to agri-environment option AB4 skylark plots, which will need to be secured by legal agreement.

3.2 Timing of operations eg clearance of hedgerow for access will be required to avoid anyone connected with project from committing an offence of disturbing nesting birds. Section 4 (Recommendations) of the submitted Ecological Appraisal (Mill House Ecology Oct 2015) will need to be secured by planning condition.

3.3 Amphibians and reptiles

Subject to a condition to implement the mitigation measures contained in the submitted Ecological Appraisal, I am satisfied that will be no significant adverse impacts on Gt crested newt, a European Protected Species, and other amphibians and reptiles.

3.4 Bats

Through the retention of boundary trees and biodiversity improvements, the development of the application site is considered unlikely to result in significant habitat loss effects on foraging /commuting bats, provided a sensitive lighting scheme is implemented. The lighting design will therefore need to minimise impacts on bats to avoid deliberate disturbance to these European Protected Species. A detailed & sensitive Lighting scheme will need to ensure that the vegetated features on the site are not illuminated to a level greater than 1 lux. This is required in order to adequately minimise the impact of the development on bats.

I am satisfied that will be no significant adverse impacts on these European Protected Species, subject to appropriate conditions to protect the retained trees and hedgerows (and to control exterior lighting), which are important bat foraging and commuting routes.

3.5 Breeding birds

Subject to appropriate conditions being attached to any consent to secure the mitigation measures as recommended in the submitted Ecological Appraisal, particularly during construction, I am satisfied that will be no significant adverse impacts on nesting birds.

3.6 Priority habitat - hedgerow

The loss of a section of roadside hedgerow to provide site access will require replacement planting within the development and appropriate ongoing management to ensure ecological functionality for this Priority habitat.



3.7 Priority species

In addition to mitigation during construction, confirmation that all the fencing within the development is hedgehog-friendly as mitigation for loss of connectivity for this Priority species.

I am satisfied therefore that there will be no significant adverse impacts on the Priority Species likely to be present on site, subject to appropriate conditions for clearance and hedgehog friendly fencing throughout the development.

4 Biodiversity enhancements

Biodiversity enhancements should be incorporated into the design of the development in accordance and I am satisfied that the enhancement recommendations set out in the submitted Ecological Appraisal are appropriate and reasonable.

However I would welcome a discussion about an additional enhancement opportunity, to fit integrated bird boxes for swift, a Priority species, into the building design.

5 Recommendations

The mitigation measures identified in the Ecological Appraisal (Mill House Ecology Oct 2015) 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.

I would also expect the preparation of a long term Landscape & Ecological Management Plan (LEMP), prior to 1st occupation. Submission for approval and implementation of these plans in full 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 Appraisal (Mill House Ecology, Oct 2015) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

II. PRIOR TO COMMENCEMENT: SKYLARK MITIGATION STRATEGY

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

III. PRIOR TO SLAB LEVEL: BIODIVERSITY ENHANCEMENTS

"All ecological measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal (Mill House Ecology, Oct 2015), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination"



IV. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

- a. *"Prior to occupation, a Landscape and Ecological Management Plan (LEMP) for the landscape buffer and habitats on-site shall be submitted to and be approved in writing by the local planning authority. The content of the LEMP, shall include the following:*
- a) Description and evaluation of the features to be managed and enhanced*
 - b) Aims and objectives of management*
 - c) Appropriate management options for achieving aims and objectives*
 - d) Prescriptions for management actions*
 - e) Preparation of a work schedule (including annual work plan capable of being rolled forward over a five year period)*
 - f) Details of the body or organisation responsible for implementation of the plan*
 - g) Ongoing monitoring and remedial measures*
- b. *The LEMP shall also include details of the legal and funding mechanisms by which the long term implementation of the plan will be secured by the developer with the management body responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."*

V. 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."

6. Reasons

6.1 The applicant has provided sufficient information to allow the LPA to discharge its duties under the UK Habitats Regulations.

6.2 The applicant has provided sufficient information to allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended.

6.3 The applicant has provided sufficient information to allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority habitats & species)



7 Conclusion

I agree that the works will result in impacts on important ecological features including Priority hedgerow habitat and could impact on Protected and Priority species. However with mitigation secured, these 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.

I have made these recommendations in order to minimise the impact of the proposal on ecology and having due regard for the NPPF and Policy CS5, as well as the statutory obligations of 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

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.

From: Thurston Parish Council [<mailto:info@thurstonparishcouncil.gov.uk>]
Sent: 17 March 2017 10:10
To: Planning Admin; Phillip Isbell; Trevor Saunders
Subject: FW: Saved search results and Tracked Applications have been updated

For the attention of: Dylan Jones

Dear Dylan,

As the case officer tasked with dealing with the Planning Applications listed below may I please confirm that the responses from both Thurston Parish Council and Thurston Neighbourhood Plan Team should be read as one overall response and should form part of the Parish Council's Statutory Consultee response.

Ref: 4386/16 Erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space - Land on the west side of Barton Road, Thurston IP31 3NT

Ref: 4963/16 Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road. - Land west of Ixworth Road, Thurston IP31 3PB

Ref: 5070/16 Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access) - Land at Norton Road, Thurston

Ref 4942/16 Residential development consisting of 64 dwellings and associated highway, car parking and public open space - Land at Meadow Lane, Thurston IP31 3QG

Ref 5010/16 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16 - Land to the south of Norton Road, Thurston IP31 3QH

Should you have any queries on this matter perhaps you would be kind enough to contact me.

Kind regards

Vicky

Mrs V Waples
Clerk & Proper Officer to Thurston Parish Council
Parish Council Office
New Green Centre
New Green Avenue
Thurston
IP31 3TG

Tel: 01359 232854

Website: Thurston.suffolk.cloud



From: Greg McSorley
Sent: 23 March 2017 15:00
To: Planning Admin
Subject: Re 4386/16 Land on the west side of Barton Road

Good afternoon,

Thank you for consulting us on this proposal. In my opinion there would be no significant impact on known archaeological sites or areas with archaeological potential. I have no objection to the development and do not believe any archaeological mitigation is required.
Best wishes,

Greg McSorley
Business Support Officer
Suffolk County Council Archaeological Service
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk IP32 7AY
Tel.: 01284 741230
Email: greg.mcsorley@suffolk.gov.uk

Sent: 25 April 2017 16:26

To: Dylan Jones

Subject: RE: Planning applications for 872 houses in Thurston

Dear Dylan, thank you for your enquiry. Of the 6 applications we only responded to 5070/16, the remaining applications had no environmental constraints in our remit.

Flood risk

None of the sites are in areas at risk of fluvial flooding. The assessment of risk of flooding from surface water is a matter for the lead local flood authority; Suffolk County Council.

Foul water disposal

According to our records there should be sufficient headroom within the Thurston Water Recycling Centre permitted Dry Water Flow to accommodate all 827 dwellings. It is important, however, that you consult Anglian Water as they are the only ones that can confirm whether the local foul sewers have sufficient hydraulic capacity.

The developers of each individual site should already have approached AWS with a Pre-development Enquiry. However, depending on the timing of those enquiries they may not have considered the cumulative impacts.

Water supply

Thurston lies in an area of water stress. Our standard water resources comments for this situation are below:

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

The development lies within the area traditionally supplied by Anglian Water Services Ltd. It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. You should seek advice from the water company to find out if this is the case, or a new source needs to be developed or a new abstraction licence is sought. We may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.

THE LOCATION OF DEVELOPMENT SHOULD TAKE INTO CONSIDERATION THE RELATIVE AVAILABILITY OF EXISTING DEVELOPED WATER RESOURCES

The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.

EVERY OPPORTUNITY SHOULD BE TAKEN TO BUILD WATER EFFICIENCY INTO NEW DEVELOPMENTS, AND INNOVATIVE APPROACHES SHOULD BE ENCOURAGED.

We support all initiatives aimed at reducing water use. The extent of water efficiency measures adopted will affect the demand for water for the development and we would expect that this will be taken into consideration. It is assumed that new houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. We support greywater recycling as it has the potential to reduce water consumption in the average household by up to 35% if achieved in a safe and hygienic manner.

It is the responsibility of the applicant to ensure that no local water features (including streams, ponds, lakes, ditches or drains) are detrimentally affected, this includes both licensed and unlicensed abstractions.

If the proposal requires an abstraction licence, it is recommended that the applicant contact our permitting centre. Depending on water resources availability a licence may not be able to be granted.

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

External 02 03 02 58389

Mobile 07845 875238

graham.steel@environment-agency.gov.uk

<https://www.gov.uk/government/organisations/environment-agency>

<https://www.gov.uk/flood-risk-assessment-for-planning-applications>

<https://www.gov.uk/flood-risk-assessment-local-planning-authorities>

Iceni House, Cobham Road, Ipswich, IP3 9JD

From: Khan Wasil [mailto:Wasil.Khan@networkrail.co.uk] **On Behalf Of** Town Planning SE
Sent: 03 May 2017 11:56
To: Planning Admin
Cc: Town Planning SE
Subject: Consultation on Planning Application 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT / (anglla)

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application 4386/16 and offering us the opportunity to comment.

We have reviewed the application above and assessed the further combined developments which include the below planning applications.

- 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH – 175 dwellings
- 4963/16 / Land west of Ixworth Road, Thurston IP31 3PB – 250 dwellings
- 4942/16 / Land at Meadow Lane, Thurston IP31 3QG – 64 dwellings
- 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT – 138 dwellings
- 5070/16 - Land at Norton Road, Thurston – 200 dwellings

We note the five submitted developments have a total residential occupancy of approximately 827 units.

It should be noted that Network Rail's strategy is to close level crossings wherever possible as this removes any interface where a person or vehicle could be struck by a train. Therefore the major concern for Network Rail in relation to these proposals, is the Barrow level Crossing at Thurston Station. Historically we have seen a number of issues at this crossing and cannot accept additional impact and further usage unless mitigation and measures are introduced; therefore the preferred option in this location would be to close the level crossing.



The safety justification for closure of the crossing is set out below:

Thurston station level crossing is a footpath crossing with miniature warning lights located at the end of the platforms at Thurston. The crossing traverses two lines and is 8.9m in length, equating to a user requirement of 11.35 seconds to traverse the crossing, with a required sighting distance of 381m, of which there is currently insufficient sighting but this is mitigated by the miniature warning lights.

Trains run frequently over the crossing with approximately 124 trains running at up to 75mph for 24 hours per day with stopping and non-stopping trains.

Particular factors have to be considered for the safety of those using the crossing. Network Rail has a standard Risk Assessment tool called ALCRM (All Level Crossing Risk Model), which determines the predictive level of risk at a level crossing based on a variety of factors, including misuse, train information, number of users, the environment, available sighting etc. Based on the information entered, ALCRM calculates the risk score which generates an individual risk to a user (A to M) and a collective risk (1 to 13) with A and 1 being the highest calculated risk.

Within these risk bands, ALCRM also calculates a Fatality & Weighted Injuries (FWI) score. When the last ALCRM assessment was undertaken in July 2015, Thurston level crossing's risk score was calculated as 0.001924552 (D4), which is outside of ALCRM's high risk categories.

The proposed residential development will see the usage at this crossing increase to a greater level and therefore mitigation options to decrease the risk will need to be explored in order for Network Rail to support the planning application.

Without definitive numbers, the increase in pedestrian footfall has been modelled in ALCRM as follows:

- 75 Pedestrians per day: D4 with a FWI of 0.001924552 (Last census)
- 120 Pedestrians per day: D4 with a FWI of 0.003079283
- 150 Pedestrians per day: D4 with a FWI of 0.003849104
- 200 Pedestrians per day: D3 with a FWI of 0.005132138

As you can see the FWI rises, with 200 pedestrians a day this would move the crossing into a High risk category. Currently a new risk assessment is being carried out and from a safety perspective if the development were to be approved then the level crossing will see a significant increase in pedestrian usage (currently 75 users per day). In all of the aforementioned pedestrian scenarios, there would be a marked increase in the risk profile at this level crossing which would therefore be unacceptable.

Given the increase in risk and increased usage at the station, we believe the development will have a severe effect on safety unless mitigation measures are introduced and contributions are provided in order to fund the closure of the crossing. The measures required to close the crossing are outlined in the attached feasibility report. In light of the 5 applications coming forward, we believe the only fair and reasonable solution would be for the applicants to share the cost of the crossing closure. The cost of the closure is estimated to be £1 million, which equates to £1209.19 per dwelling.

Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied by the amount of dwellings which are permitted, to enable the closure of the level crossing.

Reason: To ensure safe and suitable access can be provided in accordance with Paragraph 32 of the NPPF.

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



From: planningadmin@midsuffolk.gov.uk [mailto:planningadmin@midsuffolk.gov.uk]

Sent: 06 April 2017 15:20

To: Town Planning SE

Subject: Consultation on Planning Application 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

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

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us

within 14 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are GP1, RT12, CL6, H17, HB13, NPPF, CL8, CL5, Cor1, Cor2, Cor5, Cor9, CSFR-FC1, CSFR-FC1.1, CSFR-FC2, H13, H14, H4, H16, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587, registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

From: Philippa Stroud
Sent: 10 May 2017 11:08
To: Dylan Jones
Subject: RE: Position statement for Bovis NOISE

WK/193422

Hi Dylan,

Ref: 4386/16/FUL

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 your further consultation.

The pumping station information forwarded by Leslie Short on 8 May is satisfactory and I confirm that I require no further noise assessment in that regard.

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.

Regards,

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

Telephone: 01449 724724

Email: Philippa.Stroud@baberghmidsuffolk.gov.uk
Websites: www.babergh.gov.uk www.midsuffolk.gov.uk



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0300 123 4000



AMENDED PLANS CONSULTATION

PARISH COUNCIL

Comments from: Thurston Parish Clerk

Planning Officer: Dylan Jones
Application Number: 4386 / 16
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
Location: Land on the west side of Barton Road, Thurston IP31 3NT

Please find below the comments from the Parish Council:

Please be advised that whilst the Parish Council accepts and supports that the new access layout has been amended to achieve a more acceptable visibility splay, it still has overall concerns with this application.
The Parish Council's and Neighbourhood Plan Team's letters of 9th December 2016 and 22nd November 2016 and the comments contained therein should still be considered as valid.

For clarity the Parish Council has previously raised concerns covering the following:

- location within the countryside and outside of built up area boundary
- overdevelopment of site given density being proposed
- siting of 2 storey dwellings along boundaries out-of-keeping with adjacent area
- 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 - please refer to comments from Network Rail.

Signed: Mrs V Waples

Date: 25.05.2017

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



2 June 2017

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

By email only

Hi Dylan

Application: 4386/16

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 revised Ecological Survey report (MHE Consulting, April 2017) now 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 (M HE 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

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.

Our Ref: 570/CON/4386/16
Date: 8th June 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

For the Attention of: Dylan Jones

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

Dear Dylan,

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/4386/16

PROPOSAL: to Planning Application 4386/16 for 138 Dwellings off Barton Road Thurston.
Bovis Homes

LOCATION: Barton Road, Thurston, Suffolk

ROAD CLASS: C

This letter is complimentary to that ref 570/CON/4386/16 dated 10th March and 15th March 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 access has been laid out and completed in all respects in accordance with Drawing No. THU-P-001 Rev D and with an entrance width of 5.5 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 visibility splays shall be provided as shown on Drawing No. THU-P-001 Rev D with an X dimension of 2.4m metres and a Y dimension of 59 metres (to the south) and 120 metres (to the north) and thereafter retained in the specified form. 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 in order to take avoiding action.

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 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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

8. 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.

Highway Drainage

9. Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local 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: In the interests of highway safety to prevent hazards caused by flowing water or ice on the highway.

Comment: Drawing 146/2015/02 shows permeable paving. It is highly unlikely that the Highways Authority would consider adoption of permeable paving into the public highway due to high future maintenance and replacement costs. Nor would the Highway Authority be minded to accept adoption of soakaways or other drainage features that are not within the proposed limits of the public highway. It is recommended that highway drainage details are discussed with the Highways Authority at an early stage of the design process.

Comment: The applicant is reminded that surface and foul drainage systems within roads proposed for adoption by the Highways Authority through Section 38 of the Highways Act (1980) shall be adopted by the relevant statutory undertaker except in exceptional circumstances.

Footway and cycle connectivity (inc Public Rights of Way)

10. Condition: The footway shown as orange squares on plan THU-P-001 Rev D should be metalled using standard materials and drained.

Reason: To provide a pedestrian facility suitable for all year use.

Comment: It is recommended that this footway is included within the S38 adoption process.

11. Condition a metalled footway as shown on Drawing THU-P-001 Rev D of minimum 2.0 metres shall be provided from the site entrance southwards along the site frontage to connect with the existing footway along Barton Road.

Reason: To provide a safe, suitable facility for pedestrian from the development to access the main village and vice versa

Highway S106 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. Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £47557 is required on commencement of work on site
2. 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 £8711 is required at the commencement of the first dwelling.
3. Contribution towards extension of the 30mph speed limit on Barton Road west of Mill Lane. A contribution of £8000 is required on commencement of construction work on site.
4. Contribution towards provision of pedestrian crossing facilities at the junction of Norton Road / Station Hill / Ixworth Road. A contribution of £15068 is required on occupation of the first dwelling.
5. Creation of new Public Right of Way along the southern boundary of the site to Heath Road (Cycle route 51). A contribution of £34000 is required on completion of 50% of the total number of dwellings.

The S278 and 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

For a development of this size we will require a travel plan and contributions to be secured by a S106 agreement. The contributions are as follows:

6. Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum until five years have passed after occupation of the final dwelling. 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

7. Travel Plan Implementation Bond - £108,585 (based on SCC calculations on the estimated cost of fully implementing the travel plan for 140 dwellings). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves

We would also require the following Section 106 obligations:

- Implementation of the Travel Plan
- Provision of an approved welcome pack to each dwelling after first occupation
- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

Yours sincerely



Steve Merry
Transport Policy and Development Manger
Resource Management

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@PlaceServices



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

19/06/2017

For the attention of: Dylan Jones

Ref: 4386/16; 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 138no. dwellings, new vehicular access and provision of a cycle/pedestrian link to Barton Road. This letter sets out our consultation response on the additional landscape appraisal and strategy documents submitted on the 16/06/17 as a result of our earlier feedback on the document submitted on the 23/03/17.

Review on the submitted information

Relevant to this landscape review, the submitted application relates to Recommendations 2 and 5 in our original response. The application now includes two additional documents; a Landscape Appraisal and a Landscape Strategy, rather than the original one document submitted.

The Landscape appraisal suitably describes the appropriate viewpoints 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.

The Landscape Strategy gives good examples of how the landscape design will be encompassed into the development masterplan. At this stage in the planning process it sufficiently explores the different treatment methods, and the soft and hard landscape materials proposed. However, it is still advised as part of Recommendation 3 and 4 in our response dated 23/03/17 that a detailed landscape and boundary planting plan, landscape maintenance plan and specification are submitted as planning conditions.

Yours sincerely,

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

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils
N.B. This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to the particular matter.



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Agenda Item 7e

Committee Report

Committee Date: 12th July 2017

Item No:

Reference: 4942/16

Case Officer: Dylan Jones

Description of Development: Residential development consisting of 64 dwellings and associated highway, car parking and public open space

Location: Land at Meadow Lane, Thurston IP31 3QG

Parish: Thurston

Ward: Thurston & Hessett

Ward Members: Councillors Esther Jewson & Derrick Haley

Site Area: 3.03

Conservation Area: No

Listed Building: Manor Farm which is Grade 2* listed and Grange Farmhouse, Grade 2 Listed.

Received: 12/12/2016

Expiry Date: 30/06/2017

Application Type: Full Planning Permission

Development Type: Smallscale Major Dwellings

Environmental Impact Assessment: Schedule 2 development – EIA not required.

Applicant: Laurence Homes (Eastern) Ltd

Agent: BDG Design (South) Ltd

DOCUMENTS SUBMITTED FOR CONSIDERATION

The defined Red Line Plan for this application is drawing number 15.033/100 received on the 12th December 2016. This drawing is the red line plan that shall be referred to as the defined application site. Any other drawings approved or refused that may show any alternative red line plan separately or as part of any other submitted document have not been accepted on the basis of defining the application site.

Submitted Documents:

Layout plan reference number 15.033/101C received on the 9th May 2017.

Plans & elevations plan reference number 15.033/102 received on the 13th December 2016.

Plans & elevations plan reference number 15.033/103 received on the 13th December 2016.

Plans & elevations plan reference number 15.033/104 received on the 13th December 2016.

Plans & elevations plan reference number 15.033/105 received on the 13th December 2016.
Plans & elevations plan reference number 15.033/106 received on the 13th December 2016.
Plans & elevations plan reference number 15.033/107A received on the 9th May 2017
Plans & elevations plan reference number 15.033/108 received on the 13th December 2016.
Plans & elevations plan reference number 15.033/109 received on the 13th December 2016.
House type plan reference number 15.033/110 received on the 13th December 2016.
House type plan reference number 15.033/111 received on the 13th December 2016.
House type plan reference number 15.033/112 received on the 13th December 2016.
House type plan reference number 15.033/113 received on the 13th December 2016.
House type plan reference number 15.033/114 received on the 13th December 2016.
House type plan reference number 15.033/115 received on the 13th December 2016.
Garage & car port plan reference number 15.033/116 received on the 13th December 2016.
Garage & car port plan reference number 15.033/117 received on the 13th December 2016.
Foul pump station plan reference number 15.033/118 received on the 13th December 2016.
Street elevation plan reference number 15.033/200A received on the 9th May 2017
Street elevation plan reference number 15.033/201A received on the 9th May 2017
Strategic landscaping plan reference number 15.033/300A received on the 9th May
2017Landscape and visual assessment plan reference number 17.2088.01 received on the
9th May 2017.
Arboricultural Planning Statement received on the 12th December 2016
Revised Design and Access Statement received on the 9th May 2017
Ecological scoping survey received on the 13th December 2016
Flood risk assessment received on the 13th December 2016
Ground investigation report received on the 13th December 2016
Planning statement received on the 13th December 2016
Land contamination phase 1desk study received on 9th March 2017
Sustainable Urban Drainage maintenance plan received on 13th June 2017
Soakaways drainage plan received on 13th June 2017
Exceedance Flood Plan received on 13th June 2017
Drainage strategy construction details plan reference number 15-050/DSD-01 Rev P1
received on 13th June 2017

The application, plans and documents submitted by the Applicant can be viewed online at
www.midsuffolk.gov.uk via the following link:

<http://planningpages.midsuffolk.gov.uk/online-applications/simpleSearchResults.do;jsessionid=3C8D88B2598E491D44193C51A243937C?action=firstPage>

Alternatively, a copy is available to view at the Mid Suffolk and Babergh District Council
Offices.

SUMMARY

The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. The scheme is contrary to the adopted Mid Suffolk Core Strategy; however, the Council cannot demonstrate a 5 year supply of housing and the scheme falls to be considered under paragraph 14 of the NPPF where the adverse impacts of the scheme have to be balanced against the benefits of

the scheme to demonstrate that it constitutes sustainable development. Officers are recommending a minded approval of this application as it is considered to be sustainable development as the public benefits that the scheme will deliver (contributions towards a new school, pre-school, highway improvements, health provision, affordable housing and library facilities amongst others) are considered to outweigh the negative aspects of the proposal.

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason/s:

- It is a “Major” application for residential land allocation for 15 or over dwellings.

PART TWO – APPLICATION BACKGROUND

1. This section details history, policies, advice provided, other legalisation and events that forms the background in terms of both material considerations and procedural background.

History

2. The planning history relevant to the application site is listed below. A detailed assessment of the planning history including any material Planning Appeals will be carried out as needed in Part Three:

There is no planning history for this site.

3. The following applications are also considered to be relevant to the consideration of this proposal as they represent the other major applications for residential development in Thurston that are currently with the Council for consideration:

2797/16 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane. The applicant is Hopkins Homes and this proposal is identical to appeal 5010/16.

4386/16 Full planning application for the erection of 138 dwellings on land on the west side of Barton Road, Thurston. The applicant is Bovis Homes.

4963/16 Outline application for the erection of up to 250 dwellings and associated infrastructure including the provision of up to 2.4ha of land for use by the Thurston Community College and the provision of land for a new primary school on land west of Ixworth Road, Thurston. The

applicant is Persimmon Homes.

5010/16 Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road. The applicant is Hopkins Homes and this proposal is identical to application 2797/16. (This case is at appeal for the non-determination of the proposal in the statutory period of 13 weeks for a major application).

5070/16 Outline Planning Permission sought for the erection of up to 200 homes (including 9 self-build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access) on land at Norton Road, Thurston – The applicant is Pigeon Capital Management.

The consideration of the cumulative infrastructure issues that this group of applications present has been explored in a collaborative, but without prejudice, working group including County and District Council Officers with the five respective applicants and their technical advisers. This has enabled a constructive and timetabled analysis of the proposals and their cumulative impact.

Details of Previous Committee / Resolutions

4. None

Details of Member site visit

5. Members visited Thurston on the 13th June to look at this site and the four other residential development schemes that are currently with the Council for consideration.

Details of any Pre Application Advice

6. The applicant engaged with the Council and received pre-application advice on the principle of the development and its acceptability having regards to the fact that the Council does not have a 5 year supply of housing.

PART THREE – ASSESSMENT OF APPLICATION

7. Summary of Consultations

Thurston Parish Council (which includes the comments of the Thurston Neighbourhood Plan Team which is listed separately below)

The Neighbourhood Plans Team has stated that it wishes to provide the following comments on this proposal:

- Thurston is to face an unprecedented level of growth due to the submission of 6 planning applications proposing over 800 houses between them.
- The 6 applications need to be considered on a cumulative basis as failure by the District Council to do so would result in the individual schemes having a significant impact on the local community and it wouldn't meet the requirements of the NPPF.
- Consider that the Neighbourhood Plan should be given some weight in the consideration of this proposal as it has been the subject of public consultation despite not allocating sites or proposing planning policies.
- The speed of the submission of the applications in Thurston and the amount of dwellings proposed between the five undetermined applications and the Granary site will result in Thurston losing its 'village feel' and for it to become 'a small dormitory town'.
- The cumulative impact of the scheme needs to be considered in the light of the 101 residences (92 dwellings and one block of flats incorporating 9 units) already granted at the Granary site.
- The current primary school is at capacity and it is landlocked and cannot be extended. Any additional houses would need additional primary school places. Agree with the County Council's stance that a new primary school is required and it should be provided before the dwellings are occupied. However, a new school causes its own infrastructure issues and there is nowhere in Thurston that has current adequate provision to assimilate the pedestrian and vehicle movements particularly at the beginning and at the end of the day in school term.
- Development is proposed on the best and most versatile agricultural land on the northern part of the village.
- The density of all of the schemes is too high and they reflect urban type development rather than what you would expect in a village.
- The local community would prefer to see schemes of no greater than 50 dwellings being built with more open space around them. They would also like to see more bungalow developments which the developers are not providing. There should also be more one and two bedroom flats/apartments and houses in the schemes.
- Thurston is accessed by a network of A roads and country lanes which are not well maintained by the County Council and are not of a design or standard to accommodate increased growth in Thurston and also that planned in the surrounding villages and in Bury St Edmunds.
- Congestion of the local highway network already exists and these schemes will make the situation worse and will cause more accidents to occur at key sites which already experience accidents in the village.
- There are no plans by network rail to improve the station at Thurston and this will cause capacity, parking and safety issues.
- There shouldn't be any more than 50 dwellings proposed per site at any one time.
- The number of dwellings proposed cumulatively will cause social impacts for the local community. These have been split in a pros and cons list as below:

| Positive | Negative |
|--|---|
| <ul style="list-style-type: none"> • New purpose built school more attuned to 21st Century needs. • Improved facilities and to allow more clubs and organisations to increase will increase | <ul style="list-style-type: none"> • A new school would potentially trigger more new houses in the future which would change the social dynamics of the village. • New cycle and walking routes to the new school would have to be created as they don't exist at |

| | |
|---|---|
| <p>their sustainability.</p> <ul style="list-style-type: none"> • More residents in the locality would help to support a greater variety of leisure facilities in the village. | <p>present.</p> <ul style="list-style-type: none"> • Newcomers to the village will put pressure on current organisations in the village will not be able to expand to meet this increased demand. |
| <ul style="list-style-type: none"> • A greater variety of shops and facilities would be supported. | <ul style="list-style-type: none"> • More shops and facilities will change the character of the village into a small town and local residents will resent this change and the new developments that have caused this change to happen. |
| <ul style="list-style-type: none"> • More residents will sustain bus and train services in the locality. | <ul style="list-style-type: none"> • More residents will increase pressure on the network which cannot be met unless improvements are made to the railway station car park. |
| <ul style="list-style-type: none"> • More pressure for a medical surgery. | <ul style="list-style-type: none"> • The nearest practice doesn't have capacity and all that is being asked through this and the other schemes is a contribution towards health care which will make the service unsustainable. |
| <ul style="list-style-type: none"> • Additional footpaths and cycle ways will offer a variety of routes for walkers and cyclists. | <ul style="list-style-type: none"> • The new residents using the paths will not be familiar with the way that local residents look after their valued paths and this could result in bad feeling against them. There may also be more dogs off leads which could cause problems. |

Specifically in relation to the Laurence scheme, the Neighbourhood Plans team raise the following points:

- The site on Norton Road has only one vehicular entrance to potentially 64 dwellings with a footpath to Meadow Lane.
- Road safety with emphasis on the junctions of Norton Road and Ixworth Road which is very close to the Community College at the AM and PM peak times.
- Road safety issues with emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pockeridge Corner.
- Pedestrian safety along Norton Road for accessing village facilities as there are no safe crossing points
- Impact of the vehicular movements from a single point of entry onto Norton Road. It is also on the same side and near to the entrance to Rylands Close with also generates traffic
- Development inappropriate to that of land abutting the countryside
- Impact on village infrastructure particularly education and health provision
- Type and density of housing mix not in accordance with the Neighbourhood Plan findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people.
- Cost of affordable homes for local residents – the application fails to take into account the District Wide need on the housing register for 1 and 2 bedrooms with a

smaller element requiring 3+ bedroom properties.

Thurston Parish Council has objected to this proposal on the following grounds:

- This proposal is outside the development boundary for Thurston, albeit adjacent to it but it is considered that the scheme would bring forwards dwellings that would be visually, physically and functionally isolated from the facilities and services offered by Thurston.
- This is overdevelopment of the site and it should be limited to 50 dwellings in line with the requirements of the local residents.
- The two storey dwellings that are proposed along the western and southern part of the site is no a feature of the surrounding area and as such, the scheme will fail to complement the character of the existing area. These properties should be replaced by single storey properties which would minimise the impact.
- There are privacy issues in terms of loss of daylight and overlooking between some of the proposed dwellings where they face existing properties.
- The proposal fails to protect the intrinsic character of the surrounding countryside. This is contrary to policy CS5 of the Core Strategy and policy FC1.1 of the Core Strategy Focused Review and policies H13 and H16 of the Mid Suffolk Local Plan.
- The density and mix of the housing as proposed fails to take into account the accommodation needs of the area.
- Supports the comments of the police in that the hedging in and around the site could provide a fear of crime for the local residents.
- The proposal is not considered to provide safe access for all as required in paragraph 32 of the NPPF. There are particular concerns with pedestrian and cycle facilities and the ability to integrate the scheme with local public transport.
- Is particularly concerned at the location of the access point into the site so close to Rylands Close and Sandpit Lane. If a second access point is provided, this will cause further problems in the locality.
- Due to the location of the site and in particular its access point, this will encourage the residents to use their car rather than walk.
- All proposals in Thurston should be considered on a cumulative basis and at the same time as a full review of the local infrastructure is carried out.

MSDC - Environmental Health – Contaminated land – Does not object to the scheme on contamination grounds subject to the imposition of planning conditions.

MSDC - Environmental Health – Public Protection – Does not raise any objections to this scheme on air quality grounds.

MSDC Heritage Officer – The site lies on agricultural land which is within the setting of Manor Farm which is Grade 2* listed and also Grange Farmhouse.

The Historic Buildings Officer advises that due to the location of the site which when developed will read as an extension to the existing residential part of the village would cause no harm to the setting of the listed buildings referred to above. As such, he has no objections to this proposal.

MSDC - Strategic Housing (Summary) – Advises that no objections are raised to the scheme as submitted as 35% affordable housing is proposed in line with the Council's requirements. The strategic Housing Officer advises that the affordable housing requirement for the site is 22 affordable units. These are broken down as follows:

General needs affordable dwellings:

- 2 x 1 bed 2 person flats @ 48m²
- 2 x 2 bed 3 person bungalows @ 63m²
- 9 x 2 bed 4 person houses @ 76m²
- 2 x 3 bed 5 person houses @ 85m²

Total: 15 units

Shared Ownership:

- 2 x 1 bed 2 person flats @ 48m²
- 4 x 2 bed 4 person houses @ 76m²
- 1 x 3 bed 5 person houses @ 86m²

Total: 7 units

MSDC Sustainability Officer – Objects to the scheme as it was considered that insufficient information has been submitted in terms of the sustainability of this scheme.

MSDC Tree Officer – Does not object to this proposal subject to the imposition of a condition requiring details of tree protection measures during the build process for this proposal.

SCC Archaeology – Does not raise any objections to this scheme subject to the imposition of conditions to record any archaeological artefacts that may be found during the building out of the site.

SCC Flood and water management – Initially objected to the scheme. The applicant has subsequently been in negotiation with the Flood and Water Management team over the objections and following the submission of additional information the Flood and Water Management team no longer object to this proposal subject to the imposition of suitable planning conditions.

The SCC Flood Management Team has been asked to comment on the cumulative impact of 827 houses being proposed in Thurston and they have commented that they would expect all of the developers to design suitable sustainable drainage systems (which they all have). All of the 5 sites are in a flood zone 1 so they comply with national policy requirements. However, surface water drainage has historically been an issue in Thurston with soil conditions not being viable for water to drain away easily. Most of the surface water from the village is drained into the foul sewer system with the east part of the village having a surface water drainage system. It is understood that Anglian Water are considering options to improve capacity in the locality to help to prevent the flood events that have happened in the centre of the village in recent years.

SCC Highways – The Local Highway Authority has provided two responses on this proposal. One deals with the cumulative impact of this scheme and the four others that have all been submitted in Thurston on the local highway infrastructure. The second response deals with the highway issues that are specific to this proposal.

Cumulative impact - The Transport Assessments provided for the individual proposed developments show varying degrees of impact on the highway infrastructure. To date none have shown the cumulative impact of all five developments but at some locations the Local

Highway Authority considers this may be severe, particularly where the network is already close to or exceeding capacity. Paragraph 21 of the National Planning Policy Framework (NPPF) states that planning policies should recognise and seek to address potential barriers to investment, including any lack of infrastructure and identify priority areas for infrastructure provision. Both SCC and MSDC are aware that paragraph 32 of the NPPF states that development should only be prevented on transport grounds where residual impacts of development as severe. The same statement allows decisions to be made taking account of whether improvements can be undertaken within the transport network that cost effectively limits the significant impacts of development.

On this occasion, we consider that by taking a co-operative approach for all five developments there is an opportunity that the planning process can provide improvements to both mitigate against any severe impacts and any lack of transport infrastructure.

Highway Infrastructure (Congestion)

The initial data and modelling provided in Transport Assessments indicates that the road network will experience additional traffic through growth and development and at some locations this will exceed the theoretical junction capacity. Those junctions that are or may exceed capacity are discussed below.

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

Modelling shows that this junction is already close to theoretical capacity in the AM peak with northbound traffic waiting to turn onto the A143 queueing on Barton Road and at capacity in the PM peak with Thurston bound traffic waiting right from the A143 into Barton Road. The additional traffic from the proposed developments in Thurston will exacerbate these problems; in particular, modelling shows the queueing traffic on Barton Road will exceed capacity in the AM peak.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

Modelling indicates that the southbound approach to the junction is currently close to capacity in the morning peak and that its capacity will be exceeded before all five developments could be delivered. However, in the PM peak the junction has the capacity for the predicted traffic for all developments.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The modelling of this junction shows some inconsistencies with one study indicating it will be close to capacity southbound on Thedwastre Road in the AM peak due to traffic from one specific development but other modelling showing it would have capacity for the traffic generated by the developments.

Highway Infrastructure (Road Safety)

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

There have been three recorded crashes resulting in slight injuries and one involving serious injury at this junction in the last 5 years for which data is available (2012-2016).

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

There have been two crashes resulting in slight injuries at this junction in the past 5 years.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

At this junction there have been 9 crashes resulting in slight injuries and one resulting in a serious injury in the past 5 years.

The frequency of injury related crashes at the C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner) junction would, in the opinion of SCC, necessitate some work to improve road safety. Although the frequency of crashes at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road does not justify significant road safety improvements it is a factor that should be considered in any future mitigation measures.

Suggested Mitigation Measures

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

An assumption has been made that the junction can be signalised and that this will reduce congestion and improve road safety. Although there is a generous width of highway verge in the vicinity of the junction the geography of the site may place constraints on the design and further work is required to confirm that a solution is possible or beneficial. The proposed junction improvements would be delivered through a jointly funded S106 contribution.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

The issue of congestion on the southbound approach is difficult to mitigate as there is insufficient land within the highway boundary to provide a meaningful solution. It is noted that the road network around Thurston is relatively permeable and an option exists for traffic to avoid this by diverting onto Beyton Road and then turning right to approach this junction from the east.

Several minor traffic management features such as improved signing, marker posts and high friction surfacing have been used at this junction in the past as crash reduction measures. Despite this, crashes causing injury continue to occur. To reduce the severity of these crashes it is proposed to restrict the road to 40mph and undertake local safety improvements such as enhanced road signs and markings. This would be delivered through a jointly funded S106 contribution.

A longer term solution would be to remodel the junction or drastically remodel the road network. It is recommended these matters should be addressed in any future revisions to the Local Plan.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The highway boundary constrains any improvements in this location and thus there does not appear to be any viable mitigation to increase capacity on the southbound Thedwastre Road approach. The relatively low number of crashes suggests that the issue of road safety is not as important as it is for the other two junctions and mitigation measures would only comprise low cost work, such as road signs and markings.

Speed Limits

It is noted that a number of proposed access roads are located close to or beyond the existing 30mph speed limit in Thurston. In some cases, assumptions have been made when determining visibility for these junctions that the 85%ile speed limits are or will be close to 30mph. Developers are advised that the visibility requirements shall be designed for the measured 85%ile speed adjacent to the junction and not the posted or proposed future speed limit. A legal process must be followed to change or extend a speed limit and during this process objections can be made which can delay or stop creation of the necessary legal order. For this reason, Suffolk County Council cannot accept visibility splays based on changes to speed limits unless there is confidence that no significant objections to the traffic regulation order are likely.

Based on the available details of the five proposed developments the following changes to speed limits are suggested;

- Extend the 30mph speed limit north on Ixworth Road to Thurston Rugby Club
- Extend the 30mph speed limit on Norton Road towards and beyond Church Road
- Extend of 30mph speed limit on Barton Road west of Mill Lane
- Create a new 40mph speed limit between and including the C693 Thurston Road / C692 Thurston Road / C693 New Road and the C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road for road safety reasons.

The necessary Traffic Regulation Orders (TRO) could be raised individually or preferably as a single order. The latter is preferred as it reduces cost and administration. This can be delivered through site specific or joint S106 contributions. As stated above implementation of an order cannot be guaranteed and if a TRO is required to justify reduced visibility splay lengths then the order would need to be substantially complete before such a reduction would be accepted. If a process can be agreed between the parties' initial consultation can be undertaken in advance of determination of the planning applications.

Pedestrian and Cycling Infrastructure

The benefit of considering all five applications together is that a coherent system of footways and pedestrian crossings can be delivered in Thurston. The proposed footways are intended to provide good, direct pedestrian access both to the main village and schools. The proposed improvements, most of which have already been proposed by individual applications, are listed below:

- An uncontrolled pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road.
- A footway on west side of Ixworth Road between Norton Road and the entrance to Persimmon's site
- A footway link on Ixworth Road between the entrance to the Persimmon development and the entrance to the Thurston Rugby Club.
- A controlled pedestrian crossing facility (e.g. a raised table junction with zebra crossing) if practicable at or adjacent to the Norton Road / Station Hill / Ixworth Road junction. Pooled contributions from all 5 developments are required for the County Council to deliver this.
- A footway on the north side of Norton Road from Meadow Lane east towards Church Lane as far as the site boundary allows. This could be within the development and or on the highway verge.
- An uncontrolled pedestrian on Norton Road crossing linking the Hopkins Homes and Pigeon sites
- Meadow Lane resurfaced to improve cycle / pedestrian facilities (and maintain access to properties)
- Provide a metalled footway on Church Road between Footpath 006 and the footpath link to School Lane. This will include provision of street lighting along this short section of footpath.

- Provide two uncontrolled pedestrian crossings on Sandpit Lane to link the Hopkins Homes development to the main village

With the exception of the pedestrian crossing facility at the junction of Ixworth Road, Station Hill and Norton Road, the above are expected to be secured by conditions or S106 obligations as appropriate and delivered by the relevant development with S278 (improvements to existing highway) or S38 agreements (if adoption as highway maintainable at public expense is desired) as appropriate. All the footways are expected to be metalled and where verge space allows provision for cyclists should also be considered.

Public Rights of Way (PRoW)

It is proposed that a small number of PRoW are improved to provide alternative pedestrian links between the proposed developments and current and future school sites. These are improvements to:

- Thurston Footpath 001 between Ixworth Road and Meadow Lane. It is proposed that this is to an all-weather standard, preferably a bituminous surface.
- Thurston Footpath 018 between Ixworth Road and Mill Lane. This lies within the development site and the works can be secured by condition.
- Thurston Footpath 006 between Norton Road and Church Road. This lies within the development site and the works can be secured by condition. It is proposed that this is to an all-weather standard; preferably a bituminous surface as far as it is a safe pedestrian route to the site north of Norton Road.
- New PROW link along southern boundary of the Bovis Homes site to join Barton Road
- New PROW link from the site west of Barton Road to Heath Road, linking with Cycle Route 51.
- Improve PROW 007 North of Meadow Lane (un-metalled).

If diversion of a PRoW is likely it is recommended that discussions are held with the relevant SCC officer at an early state.

Public Transport

Improvements to public transport infrastructure will be limited to any site-specific works necessary as a result of each development through S106. All other public transport improvements are included in the CIL.

The specific highway comments relating to this scheme only are as follows:

Site Access

- Visibility splays of 4.5m x 60m are proposed and the access is within of the 30mph speed limit. This would be acceptable.
- No swept path analysis has been provided for the entrance or within site. This will be required to show that the junction design is acceptable.

Highway Drainage

- The applicant's attention is drawn to the issue of potential adoption and future maintenance of the highway drainage system. SCC is reluctant to adopt permeable paving, lagoons and most Suds systems. Early discussion with SCC Development Management officers is recommended.

Footway and cycle connectivity (inc Public Rights of Way)

- The footway link to Meadow Lane should allow use by cycles in addition to pedestrians.

Internal Highway Layout

- The 5.5m width carriageway and 2m wide verges would be acceptable for the principal access road. Details of the shared surfaces has not been supplied.

Car Parking

- In the Design and Access Statement it is proposed that on-site parking and sizes of garages will comply with the current SCC guidance

Landscaping

- On the plans supplied it is noted that trees are shown in indicative positions. These are close to and overhanging the highway. Planting of vegetation that will or may in the future overhang the road should be restricted. Before the Highway Authority would consider a layout for an adopted road the applicant will need to agree details of such planting including how these would facilitate adequate street lighting and the risk of root damage mitigated.

Proposed S278 works

- Pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road (uncontrolled)
- Improvements to surface of Meadow Lane to promote cycle / pedestrian facilities (and maintain access to properties)

Proposed S106 Heads of Terms

- Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £22,249 is required on commencement of construction work on site.
- Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road. A contribution of £4040 is required on commencement of the first dwelling.
- Contribution towards provision of pedestrian crossing facilities at the junction of Norton Road / Station Hill / Ixworth Road. A contribution of £6988 is required on commencement of the first dwelling.
- Contribution towards bus stops on Norton Road. A contribution of £4000 is required on commencement of the first dwelling.

The Local Highway Authority advises that the matters raised above and the reminder of the issues that are relevant to this proposal can be covered by planning conditions and within the S106 agreement for the scheme. The County has indicated that the cost of this will be £37,277 for the works required under S106 of the act and £23,879 for works under section 278 of the Highways Act.

SCC - Obligations Manager: Comments that 64 new houses proposed in the scheme will have an impact on local infrastructure particularly in terms of education.

Primary Provision

The residents of the scheme will generate the need for 15 new primary school places and it has been advised that there is no capacity in the local Primary School which is the Thurston Church of England Primary Academy to accommodate this development and as such a contribution is requested towards a new primary school. As new schools cannot be provided through the Council's CIL scheme (the 123 list only allows for extensions to schools and not new schools) a request is made for a contribution towards a new school under S106 of the planning act.

A contribution for £246,435 as broken down below is require to meet education needs which will arise from this development:

| School level | Minimum pupil yield: | Required: | Cost per place £ (2016/17): |
|----------------------------------|----------------------|-----------|-----------------------------|
| Primary school age range, 5-11*: | 15 | 15 | 16,429 |

Land for new school

A contribution for a further £19,410 is also requested to contribute towards the cost of the land to provide the school. This is worked out on a maximum cost of £100,000 per acre (£247,100 per hectare, which will be £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 places x £1,294 per place = **£19,410**

Temporary classroom

The Obligations Manager has also advised that there will be a need for temporary classroom arrangements to accommodate the needs of the children that arise from this development. The existing primary school is on a very constrained site and an extension to the facility is not possible under Department for Education guidelines. However, it is advised that where extra pupils either through a spike in local population or from housing development cause a 'bulge' in the admission numbers, this can be accommodated by providing temporary classrooms.

A double temporary mobile classroom providing 60 places could be located within the hard surfaced play and car park areas within the school for a period of no longer than 3 years to meet the admissions 'bulge' which would be caused by this and other large housing developments in Thurston. As the primary school is an academy whereby the County Council has limited control over its operation, agreement to the provision of the temporary building has had to be sought from the Academy board that runs the school and it is understood from the Obligations Manager, that agreement has now been given by them for this to go ahead.

The temporary classroom will be facilitated via a CIL bid as it is classified as being an extension to an existing school in the Council's 123 list.

Secondary School and 6th form provision

The Obligations Manager has commented that secondary and 6th form provision in the area is currently sufficient to accommodate the additional pupils which will be generated from this proposal as shown in the table below.

Total primary education contributions: £265,845

Restriction on occupation

The Obligations Manager has also commented that as there are two residential sites in Thurston proposing a primary school site (application 5070/16 – Land on land at Norton Road, Thurston for Pigeon Capital and 4963/16 – Land west of Ixworth Road – Persimmon Homes) but neither application is approved yet, that the district council should consider imposing a planning condition restricting occupation of any dwellings once the capacity of the existing primary school with additional temporary classroom are full. This condition could then be discharged once the construction of the new primary school on whichever site has been chosen has commenced.

Pre-school

The Obligations Manager has also noted that there are currently 4 pre-school establishments in the locality (2 childminders, Thurston pre-school and Tinkerbells Day Nursery) and that spare capacity between them is only 10 spaces. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

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

- £500,000 construction cost (including land as collocated with the new primary school) for a new 60 place setting
- £500,000/60 early years pupils = £8,333 per place From 137 dwellings there is the need for 14 additional places
- Therefore 6 pupils x £8,333 per place = **£49,998 (2016/17 costs)**

Total contribution for all education provision - £315,843

Other infrastructure contributions

Requests a contribution of £13,824 towards library provision. This is requested under the Council's CIL 123 list.

Landscape Officer – Essex Place Services: Does not raise any objections to this proposal and requests that the specific detailing of the landscaping can be controlled by a planning condition.

SCC Public Rights of Way – Does not raise any objections to this proposal as they comment that it does not directly affect public footpath no.1 which runs nearby.

Ecology Officer, Essex Place Services – Advises that the mitigation measures outlined in the applicant's ecology report should be implemented in full. The ecologist has not objected to this proposal subject to the imposition of conditions to achieve the above and to control lighting on site.

Environment Agency – Does not object to this scheme on flood risk or on foul water grounds.

They have also considered the cumulative impact of all 5 schemes together and they advise that none of the sites are in an area at risk of fluvial flooding. They also confirm that from their records there will be sufficient capacity in the Thurston Water Recycling Centre to accommodate all 827 dwellings. They have advised that Thurston lies in an area of 'water supply stress' by Anglian Water which has a duty under their own legislation to provide a water supply to new houses when they are built.

Highways England: Does not raise any objection in relation to this proposal.

Natural England – They do not have any comments to make on this proposal.

Network Rail – They have been consulted on the cumulative impact of building 827 new dwellings in Thurston on the railway station and the local railway network as requested by the local community. They state that the main issue is the Barrow Level Crossing at Thurston station which has historically seen a number of safety issues associated with it and the level of usage which would arise from the erection of the number of dwellings proposed would have a severe impact on safety unless mitigation measures are introduced. They indicate that their preferred option is to close the level crossing and replace it with a new pedestrian ramp from platform 1 (upside) down the embankment leading onto Beyton Road. This design will also need to include a drop off point/layby for vehicles along Beyton Road. They have advised that the cost of the works amount to £1million and should be shared proportionally amongst the developers. They are seeking this through a S106 agreement.

When questioned, Network Rail has made it clear that the works that they propose to the crossing point at Thurston Station are directly related to the impact of the 5 planning applications and the 827 houses that would be built. They have advised that the other works that they propose to close crossing points elsewhere on the same line are minor in nature and cannot be compared to this site as the other crossing points are not facing unprecedented levels of pedestrian use which would be generated from the proposed housing in Thurston.

NHS/Primary Care Trust – The proposal will have an impact on the Woolpit Health Centre and there will be a need to either extend or reconfigure the building to meet the additional capacity requirements that will be generated if this proposal is approved. The PCT have not specified an amount that they require, but they have confirmed that they will be making a bid under the Council's CIL scheme for the funding that they require to carry out the works they deem necessary to ensure that the facilities can meet the need that arises from this development.

Suffolk Constabulary – Initially raised a few concerns in terms of potential site security and advised how these could be resolved.

Suffolk Wildlife Trust – Raise the following points:

- The site is bordered by hedgerow which is a Suffolk Priority species. The plans are unclear in that they show the hedgerow being incorporated into domestic gardens

which will cause issues. As the hedgerow is species rich it should be retained outside of the gardens of the dwellings.

- The hedgerow on Norton Road is to be removed. It is unclear in the application if this is going to be replaced elsewhere in the site as an ecological compensation measure.
- The scheme should be lit sympathetically to ensure that it does not have a negative impact on ecology.
- There are hedgehogs in the locality which are a UK and Suffolk Priority species. We recommend that gaps are maintained in the hedgerows and boundaries within the site so that the hedgehogs can permeate through it.
- The applicant's ecology report was done late in the season for Skylarks and it could be the case that the site currently offers potential nesting for Skylarks and a compensation scheme would be required for this loss if planning permission is given.
- The scheme should provide environmental/ecological enhancements in the locality.

Representations

11 letters have been received objecting to this proposal on the following grounds:

Highway safety

- A single access point into the site is unacceptable as this will impact greatly on the known pinch points on the highway network in the village.
- Norton Road is dangerous along the stretch of highway where the access to the site will be located.
- The local roads are inadequate and dangerous to cope with so many new dwellings and they are always in a poor state of repair which will be made worse by this proposal.
- There are a number of dangerous junctions and pinch points in the area which will become more dangerous with the number of vehicles which will be generated by this development.
- There are congestion and safety concerns with the junction in the village particularly at Thedwastre Corner and Fishwick Corner.
- The Community College is already a traffic hazard. The increased number of residents will make this situation worse.
- Parking at the railway station is an issue and this will make the situation worse.
- The railway station has poor parking. Additional residents from this site using the railway station will increase the parking issues experienced.

Infrastructure

- This proposal will have a negative impact on water pressure in the locality.
- This development will create excessive additional pressure on the local GP surgeries.
- The local primary school can accommodate the children from this development as it is at capacity. Children may have to be bussed elsewhere which is not acceptable.
- A new primary school should be built before the dwellings are built and occupied.

Impact on the character and amenity of the area

- The proposal will result in urban sprawl into the surrounding open countryside and does not respect the rural building patterns and styles in this part of Thurston.
- The proposal does not respect the style or the density of any of the neighbouring properties. It is an urban style scheme in a village environment and totally out of

- keeping.
- The applicant's landscaping scheme lacks detail and has not been designed with the existing surrounding dwellings in mind.
 - The surrounding area is currently dark and this proposal will significantly alter that to an unacceptable level.
 - There are too many 4 and 5 bedroom properties in this scheme.

Impact on residential amenity

- The proposal would severely affect the amenity and the privacy of the objector by changing the character of this part of the village from agricultural to residential.
- The proposed flats on site would provide views into the objector's garden which is unacceptable.
- Consider if the layout was changed, that the scheme could be made acceptable so it does not affect the objector's living conditions.
- It is surprising that two storey properties are being erected next to bungalows. This is unacceptable as it will impact on the amenities of the bungalow owner.

Impact on wildlife/trees in the locality

- The proposal will impact on the root zones of trees in the objector's garden.
- The extent of the Ecological report for the site is not clear from the documents submitted. It needs to be clarified.

Flood risk

- Drainage is an issue in the locality. The development can only make matters worse particularly for the properties that are not on mains drainage.

Policy issues

- The proposal does not reflect the housing needs in the locality as identified in the emerging neighbourhood plan.
- All existing houses in the area should be occupied before new ones are built. When this happens development should be on brownfield land only.
- All development in Thurston should be put on hold until the neighbourhood plan and the new style local plan is in place. A limited number of developers should then be invited to apply for planning permission for residential development in Thurston.
- The site is in the Greenbelt and national policy is for that to be developed only in exceptional circumstances.
- The development is outside the settlement limits for Thurston and as such it cannot be considered to be sustainable.

Ecology

- The proposal will result in the loss of valuable ecology through the development of the field. There are bats, amphibians, Owls and Swallows, hedgehogs and mice on this site amongst many other species.

Other issues

- This field is agricultural land and it will be lost forever if this scheme is approved and built.

- This proposal will make Thurston a town and not the current village that it is.
- This proposal will add to the current safety concerns at the railway station where pedestrians have to cross over the railway line to access trains.
- The applicant has not considered archaeology or anything in relation to buildings of historic interest in his application. It is likely that there may be items of importance within the ground and the proposal would end up destroying them.
- The view across Meadow Lane which is currently enjoyed by residents will be lost.
- There would be increase pollution in the village from all of the vehicles belonging to the occupiers of the new properties.
- Why has the council allowed this developer to submit this application? Doesn't the council have any control to stop things like this from being submitted?
- The land the other side of the railway line should be developed first before this parcel.

Cumulative Impacts

- The 5 sites in Thurston should be considered cumulatively and not singularly due to their linked impacts and the effect they will have on the infrastructure of the area.
- The quantity of houses in this application is more reasonable than in the other schemes proposed However cumulatively with the others and if approved, this scheme is considered to be unacceptable as the total housing numbers between all schemes is too high.

A single letter has been received in support of this scheme raising the following point:

- 64 dwellings are more in keeping with Thurston than the other schemes proposed.

The Site and Surroundings

8. The application site lies in the village of Thurston which has a population of approximately 3200 people (2011 census) and is on the land of a former nursery business. The land contains in part a number of disused glasshouses and poly tunnels with the remainder of the land being used as open grassland for the grazing of sheep. The land is classified as grade 3b agricultural land for the part used to graze sheep and grade 5 for the part that contains the glasshouses and the polytunnels and is just over 3 hectares in area.
9. The site lies to the west of Meadow Lane, to the north of Norton Road and stretches towards Ryland Close to the west. The site extends as far north as Meadow Lodge Cottage and to the south of Cedars Close.
10. The field subject of this application is predominantly flat and is subdivided into two parts by a hedge due to its existing agricultural and former plant nursery use. The Norton Road frontage of the site is bordered by a mixture of trees and hedging with only limited views possible into the site. Meadow Lane is to the east and is a single car width dead end road, and is bordered from the site by a hedge with sporadic trees within it. There are gaps in this hedge and views are possible into the site from Meadow Lane.
11. The dormer bungalow known as Meadow Lodge Cottage has its frontage facing into the site and is only divided from the field by a post and rail fence. Ryland Close is a housing estate to the south west corner of the site and it is separated from the field by hedging. Two further properties border the site and are accessed off Ixworth Road

and these properties have substantial rear gardens that butt up to a hedge and trees which divide them from the site. Further to the north lies the most southern property on Cedar's Close which again is divided from the site by the belt of trees and hedging that runs from the western boundary of the site along the northern boundary.

12. The properties in the surrounding area include large modern detached houses to the south of Norton Road, on the road known as Cloverfields with properties of similar proportion within Rylands Close, although these are semi-detached houses as opposed to detached. The two properties on Ixworth Road are different to each other with one being a bungalow and the other a detached house. The properties on Cedar's Close to the North are all large detached houses.

The Proposal

13. Please note details of the proposed development including plans and application documents can be found online.
14. The applicant is proposed a full planning application for the erection of 64 dwellings on the application site. Vehicular access to the site will be solely from Norton Road almost at the central point of the frontage of the site. It is laid out with an estate road running though from the access point running in a squared off loop. There are private driveways at various points in the layout providing access to the various dwellings and there is a footpath link from Meadow Lane into the site to provide an alternative pedestrian access point. A large communal open space/Suds drainage area is shown as a focal point within the site and lies towards the north of the estate with a number of properties enjoying a view onto it.
15. The proposed layout for the site shows that the majority of the dwellings are two storeys. There is a bungalow proposed on site and there are also flats, but the flats are within properties that have the appearances of a detached house rather than being in a larger taller block. The applicant comments in his design and access statement that the properties are of a design and style that reflects the surrounding locality as does the suggested palette of materials. They also comment that the roofing style and the roofing materials of the proposed dwellings also match the local vernacular. The scheme as submitted has a density of 21 dwellings per hectare.

NATIONAL PLANNING POLICY FRAMEWORK

16. The National Planning Policy Framework (NPPF) contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.
17. The following parts of the NPPF are considered to be applicable to this scheme:
 - Para 6: Achieving sustainable development
 - Para 7: Three dimensions to sustainable development
 - Para 11 – 15: The presumption in favour of sustainable development
 - Para 17: Core planning principles
 - Paras 32 and 34: Transport movements
 - Para 47: Delivering a wide choice of high quality homes (including the need to have a 5 year deliverable supply of housing)

Para 49: All housing proposals should be considered in the context of the presumption in favour of sustainable development.

Paragraph 55: To promote sustainable development in rural areas.

Paras 56 & 60: Requiring good design

Para 64: Development of poor design must not be supported.

Para 69: Promoting healthy communities

Para 70: Delivery of social, recreational and cultural facilities that the community needs.

Para 72: Provision of school places.

Para 73: Access to high quality open space.

Para 75: Protection and enhancement of public rights of way.

Para 100: Development and flood risk

Para 103: Development and increasing flood risk elsewhere

Para 109: Planning system should contribute to and enhance the natural and local environment.

Paras 112 & 117–119: Development affecting protected wildlife

Para 123: Planning and noise.

Para 125: Planning and darker skies.

Paras 128 & 129: Describing the significance of a designated heritage asset.

Para 131: Determining planning applications that affect heritage assets.

Para 132: Significance of heritage assets.

Para 134: Development and less than substantial harm

Para 186: Approaching decision taking in a positive way.

Para 187: Local Planning Authorities should find solutions rather than problems in decision taking.

Para 196: Plan led planning system.

Para 197: Assessing and determining application applying the presumption in favour of sustainable development.

Paras 203 -206 – Planning conditions and obligations.

Paras 211 - 212: Using development plans and the NPPF in decision making.

Paras 214 – 215: The weight attached to development plan policies having regards to their consistency with the NPPF.

Para 216 – Weight given to policies in emerging plans

CORE STRATEGY

18. Core Strategy Focused Review

FC1 – Presumption in favour of sustainable development.
 FC1.1 – Mid Suffolk’s approach to delivering sustainable development
 FC2 – Provision and distribution of housing.

19. Core Strategy

CS1 – Settlement hierarchy
 CS2 – Development in the countryside & countryside villages
 CS4 – Adapting to climate change.
 CS5 – Mid Suffolk’s environment
 CS6 – Services and infrastructure
 CS9 – Density and mix

NEIGHBOURHOOD PLAN / SUPPLEMENTARY PLANNING DOCUMENTS /AREA ACTION PLAN

20. In 2013 Thurston received a neighbourhood plan designation and the settlement is

currently working on its new neighbourhood plan. The plan is however at an early stage and as yet does not have any policies which could be used in the assessment and consideration of this proposal

SAVED POLICIES IN THE LOCAL PLAN

21. GP1 – Design and layout of new developments
HB1 – Protection of historic buildings
HB13 – Protecting ancient monuments
HB14 – Ensuring that Archaeological remains are not destroyed
H3 – Housing developments in villages
H13 – Design and layout of development
H15 – Development to reflect local characteristics.
H16 – Protecting existing residential amenity
H17 – Keeping new development away from pollution
CL8 – Protecting wildlife
CL11 – Retaining high quality agricultural land
T9 – Parking standards
T10 – Highway consideration in developments
RT4 – Amenity open space and play areas within residential development
RT12 – Footpaths and bridleways
SB3 – Retaining visually import landscapes (with the land to the south of this site between it and the college being designated)

Main Considerations

22. From an assessment of relevant planning policy and guidance, representations received, the planning designations and other material issues the main planning considerations considered relevant to this case are set out including the reason/s for the decision, any alternative options considered and rejected. Where a decision is taken under a specific express authorisation, the names of any Member of the Council or local government body who has declared a conflict of interest are recorded.
23. The following are identified as the main considerations in assessing this application:

The Principle Of Development

24. The National Planning Policy Framework (NPPF) requires Councils to identify and update, on an annual basis, a supply of specific deliverable sites sufficient to provide for five years worth of housing provision against identified requirements (paragraph 47). For sites to be considered deliverable they have to be available, suitable, achievable and viable.
25. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites (as stated in paragraph 49 of the NPPF). Where policies cannot be considered up-to-date, the NPPF (paragraph 14) cites the presumption in favour of sustainable development and states that planning permission should be granted unless i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or ii) specific policies in the NPPF indicate development should be restricted. The presumption in paragraph 14 also applies where a proposal is in accordance with the development plan, where it should be granted without delay (unless material considerations indicate otherwise).

26. The precise meaning of 'relevant policies for the supply of housing' has been the subject of much case law, with inconsistent results. However last month, the Supreme Court gave judgment in a case involving Suffolk Coastal District Council which has clarified the position. The Supreme Court overruled earlier decisions of the High Court and the Court of appeal in this and other cases, ruling that a "narrow" interpretation of this expression is correct; i.e.it means policies identifying the numbers and location of housing, rather than the "wider" definition which adds policies which have the indirect effect of inhibiting the supply of housing, for example, countryside protection policies. However, the Supreme Court made it clear that the argument over the meaning of this expression is not the real issue. The absence of a five year housing land supply triggers the application of paragraph 14 of the NPPF. In applying the 'tilted balance' required by this paragraph, the Council must decide what weight to attach to all of the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies.
27. In accordance with National Planning Policy Guidance paragraph 030 (Reference ID: 3-030-20140306) the starting point for calculating the 5 year land supply should be the housing requirement figures in up-to-date adopted Local Plans. It goes on to state that '*...considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light....Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints...*'
28. The Council published the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA) in May 2017 which is significant new evidence for the emerging Babergh and Mid Suffolk Joint Local Plan. Therefore, the 5 year land supply has been calculated for both the adopted Core Strategy based figures and the new SHMA based figures. For determining relevant planning applications, it will be for the decision taker to consider appropriate weight to be given to these assessments and the relevant policies of the development plan.
29. A summary of the MSDC 5 year land supply position is:
- Core Strategy based supply for 2017 to 2022 = 3.9 years
 - SHMA based supply for 2017 to 2022 = 3.9 years
30. The NPPF requires that development be sustainable, and paragraph 6 of the NPPF sets out guidance on what this means in practice by drawing attention to all of the policies from paragraph 18 to 219 of the NPPF. In some circumstances there is also a presumption in favour of sustainable development which is to be applied as set out in paragraph 14 of the NPPF. This has been discussed above.
31. Paragraph 7 of the NPPF sets out three dimensions for sustainable development, economic, social and environmental:
- "an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure:*

a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."

32. In light of all of the above, this report will consider the proposal against the policies of the development plan to determine if the development is in accordance with the development plan as a whole. If it is not, and there are policy conflicts, they will need to be weighed against other material considerations to see whether a decision which does not accord with the development plan is warranted, in the light of the presumption in favour of sustainable development, and in the context of the authority not being able to demonstrate a 5 year land supply.

Sustainability of the Proposal (including assessment against the development plan and the NPPF)

33. The Parish Council and some of the objectors have commented that this scheme should be refused as this proposal is outside the development limits for Thurston and is contrary to the policies as contained in the adopted Core Strategy and Local Plan. They also comment that housing numbers should be limited in Thurston to no more than 50 per site. However, it is clear on reviewing the guidance in the NPPF as outlined above that this cannot be done as the Council does not have a 5 year supply of housing as required by the NPPF. Other comments have been received stating that the Council should not consider this application and the others in the Thurston area until the Council determine in a new style local plan its stance on the location of new housing in the district. Comments have also been made that the Council should not determine this application until the Parish Council's Neighbourhood Plan has received its referendum vote. However, national policy as contained in the NPPF does not give the Council either of these options and requires all applications to be determined promptly. Furthermore, as the Council has a deficit of housing completions with the result that it is significantly short of reaching its 5 year supply target, a limit on new housing in any part of the district cannot be given until the deficit in completions is made up to the 5 year level. This is why the housing figures in policy FC2 of the Mid Suffolk Core Strategy is considered to be out of date and cannot be used to limit housing as suggested we do by an objector.
34. In reaching a decision, paragraph 47 of the NPPF is a material consideration and requires Local Planning Authorities to boost significantly the supply of housing, by identifying and updating annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. As stated above, the Council cannot demonstrate a 5 year supply of housing and as such paragraph 49 of the NPPF applies and states that in this situation, the relevant policies for the supply of housing in the Council's adopted plan should not be considered to be up to date and that the scheme remains to be considered under the requirements of paragraphs 7 and 14 of the NPPF which defines what sustainable development is and how decisions should be made.

35. The contents of paragraph 55 of the NPPF are also considered to be material in the making of a decision on this case. Objections have been received stating that this proposal should not be allowed as it is outside the settlement limit for Thurston and that the site should be considered as countryside. Paragraph 55 of the NPPF makes it clear that Councils can no longer consider sites that are adjacent or near to a settlement limit to be unacceptable simply because they are the wrong side of a line. It now makes it clear that 'new isolated homes in the countryside will not be supported and that Councils are encouraged to promote sustainable development in rural areas by considering housing development in locations where they could enhance or maintain the vitality of rural communities. It gives an example in paragraph 55 that new housing could provide increased facilities in one settlement which would be of benefit to it and the other surrounding settlements.
36. Having regards to the above, it is considered that the application site is not in an isolated location as it is adjacent to the built up part of the village with dwellings to its west, south and north east elevations, and the scheme will bring with it contributions which will be of benefit to the residents of Thurston and the surrounding villages. Therefore, in terms of paragraph 55 of the NPPF, this proposal could be considered to promote sustainable development in a rural area. However, having regards to the fact that the Council does not have a 5 year supply of housing and has to balance the negatives of the scheme against the positives that it brings in line with the requirements of the NPPF, consideration of whether the scheme will be supported as sustainable development will be given in the conclusion to this report.
37. Since the submission of this application, four other developers have also submitted application for residential development in Thurston. Hopkins Homes have applied for 175 dwellings (2797/16 and an identical proposal under reference number 5010/16 which they have appealed for non-determination); Bovis Homes has applied for 138 dwellings on land to the west side of Barton Road under reference number 4386/16; Persimmon has applied for up to 250 dwellings and land for a new school on land off Ixworth Road (4963/16) and Pigeon Capital for up to 200 homes and also a new primary school (5070/16). Including this application, 827 new homes are currently proposed in Thurston. There are also a further 92 dwellings which have planning permission at the Granary where works are commencing on site at present.
38. Following receipt of these applications an approach of joint working to explore cumulative infrastructure issues has been agreed between the respective applicants and the District and County Council. This has enabled the constructive exploration of significant infrastructure issues on a collaborative but without prejudice basis to a consensual timetable. Therefore, as there are unprecedented numbers of new dwellings proposed it is considered that all schemes must be considered both on their own merits and in combination with each other to assess if they meet the tests for sustainable development as outlined in the NPPF. The assessment of whether this proposal is considered to constitute sustainable development is given in the conclusion.
39. Policy FC1 of the Mid Suffolk District Core Strategy Focused Review states that it takes a positive approach to sustainable development and like in the NPPF, the Council will work proactively with developers to resolve issues that improve the economic, social and environmental conditions in the area. Related policy FC1.1 makes it clear that for development to be considered sustainable it must be demonstrated against the principles of sustainable development. The policy goes on to say that proposals for development must conserve and enhance the local character of the different parts of the district and how it addresses the key issues of the district.

40. The settlement of Thurston is one of the two largest villages in the district of Mid Suffolk (with the other being nearby Elmswell) where a wide range of local services and local infrastructure is provided. Thurston has both a primary and a secondary school, and a number of other local facilities which act as a service to the inhabitants of the village as well as providing employment opportunities to the wider area. Whilst Thurston does not have a doctor's surgery, there is one in Woolpit and another in Moreton Hall which is a reasonably short journey away either by car or via public transport.
41. Thurston is also unusual in that it has a railway station which provides access for the residents to be able to commute to Ipswich, Bury St Edmunds and further afield without having to use their cars. Thurston is also on a bus route with a number of designated stops within the village.
42. In relation to paragraph 7 of the NPPF, the proposals would contribute to building a strong, responsive and competitive economy through the creation of construction and related jobs and the on-going contribution to the local economy from the creation of 64 additional households in the area. The proposals would also contribute towards providing the supply of housing required to meet the needs of present and future generations and by having the potential to create a high quality built environment, as well as contributions towards affordable housing, the highway network and other social infrastructure (public open space, education, health care) through a CIL contribution, or where appropriate, a section 106 agreement.
43. It must also be remembered that paragraph 49 of the NPPF makes it clear that housing applications should be considered in the context of sustainable development. The applicant is proposing up to 138 dwellings in this instance and they have confirmed that it is their intention if they get planning permission to commence with work on site as soon as possible. To speed this up, they have agreed to have a shorter period than is usual to commence with works on site (2 rather than 3 years) which helps to justify that as a developer, they are serious about delivering the houses. They have also signed an agreement with Mid Suffolk and Suffolk County Council to work as a group with the other 4 other developers in Thurston to contribute to and work together to achieve the necessary infrastructure within the area to make this and the other 4 schemes sustainable.
44. The Council's Sustainability Officer has objected to the scheme on the grounds that insufficient detail in terms of the build specification and the energy efficiency of the dwellings has been submitted to the Council. The applicant has subsequently submitted this information and it is considered to be sufficient to address the issues raised by the Sustainability Officer.
45. Consideration of whether this proposal is considered to constitute sustainable development, having regard to the contents of policies FC1 and FC1.2 of the Adopted Core Strategy Focused Review and the contents of the NPPF will be reached in the conclusion to this report.

Site Access, Parking And Highway Safety Considerations

46. Policy T10 of the Mid Suffolk District Local Plan provides criteria on highway considerations when assessing planning applications. This policy requires access points into and out of the site to be safe and an assessment made as to whether the existing local roads can suitably accommodate the impact of the proposal, whether adequate parking and turning spaces exist within the site and that the needs of

pedestrians and cyclists have been met. This policy is considered to carry significant weight in the determination of this application as it is in compliance with paragraph 32 of the NPPF which requires all schemes to provide safe access for all.

47. A number of objections have been received to the scheme on the grounds that a single access point from Norton Road into the site is unacceptable as it is in close proximity to a number of pinch points in the local highway network which will cause safety issues as well as increasing congestion at peak times. Mention has specifically been made that some local junctions are unsafe at present (see Local Highway Authority consultation response for details), particularly those adjacent to the railway bridge to the south of the village and that this scheme will exacerbate this problem as more vehicles will be using these junctions to access local roads, particularly the A14 to reach other destinations such as Bury St Edmunds and further afield. Comments have also been received that this scheme cumulatively with the other 4 schemes that have been submitted in Thurston for residential development will cause a significant and severe impact on the road network in the locality both in terms of congestion and safety.
48. The site is located to the north east of the village with the sole access to it being from Norton Road which lies to the south of the site. Proposed is a single access point which is proposed towards the centre of the boundary of the site with Norton Road with a network of internal estate roads leading off from that.
49. The Local Highway Authority has not objected to the scheme as he is satisfied that the access point into the site can be made safe. Furthermore, he has not raised any issues with the internal layout of the site as proposed and specific matters in relation to the above can be controlled by planning conditions. He has also accepted the applicant's trip data and is satisfied that the site can be linked to the neighbouring Pigeon site and to the village itself by a network of pavements to allow pedestrian access. The scheme is considered to meet the requirements of paragraph 32 of the NPPF in that safe access can be provided for all and the requirements of policy T10 of the Mid Suffolk District Local Plan.
50. In terms of the comments that have been received that a single access point is unacceptable and that a second access point should be provided that the Manual for Streets which the Local Highway Authority works to, allows 250 dwellings to be accessed from a single access point, and to consider refusing this scheme which has significantly less dwellings on it than that on that grounds would be difficult to defend at appeal.
51. The Local Highway Authority has considered the cumulative impact of this proposal and the other 4 schemes currently before the Council both in terms of safety and congestion on the highway network in Thurston and they have come to the conclusion that the impact of the 5 scheme if they all come forwards will be severe. However, the Local Highway Authority made it clear that the NPPF requires all public bodies to try and resolve problems and they are confident that if all 5 developers work together and are brought forwards together, suitable and cost effective alterations can be made to the highway network to ensure that the impact does not become severe. The Local Highway Authority has assessed the road network and has suggested alterations and improvements to key areas of it (see the Local Highway Authority consultation response earlier in this report for more information) which all 5 developers have been asked to contribute towards through either a section 106 agreement or through the Highways Act. All 5 developers which include Laurence Homes have agreed to contribute towards the works as requested by the Highway Authority. For the Laurence proposal, the Local Highway Authority is

requesting £37,277 via a S106 agreement, and a further £23,879 under section 278 of the Highway Act.

52. As such, the Local Highway Authority does not consider that this proposal fails the requirements of paragraph 32 of the NPPF when considered cumulatively with the other 4 residential schemes as the impact with the alterations carried out to the highway network will no longer be severe in terms of safety. For the avoidance of doubt, the Local Highway Authority has not raised any objections to this scheme on congestion grounds and does not consider that additional traffic and queuing as a consequence of this scheme can be considered to be severe to sustain a defensible refusal of planning permission.
53. The Local Highway Authority identify that the scheme will offer sustainable travel options to local residents as additional pavements and bus shelters are proposed and these will link up to both existing facilities and those proposed on neighbouring sites by the other developers seeking at the moment to build houses in Thurston. This will help to improve accessibility on foot and via public transport and will ensure that the site is accessible to the local railway station. The Local Highway Authority is also recommending that the applicant provides a travel plan to ensure that there are sustainable transport options available to the new residents of the scheme rather than just having to rely on their private cars to access local facilities. Due to the size of this scheme, the Local Highway Authority considers that this can be done via a planning condition as opposed to the S106 route which is to be used by the larger proposals.
54. Having regards to the above, it is considered that this proposal is acceptable in terms of highway safety and complies with the requirements of paragraph 32 of the NPPF and paragraph T10 of the local plan as safe access can be provided for all.

Design And Layout [Impact On Street Scene]

55. Section 7 of the NPPF refers to design. Specifically, paragraph 56 states that good design is a key aspect of sustainable development; it should contribute positively to making places better for people. Decisions should aim to ensure that development will function well and add to the overall quality of the area, establish a strong sense of place, create attractive and comfortable places to live, work and visit, optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Furthermore it provides that development should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The NPPF goes on to state it is "proper to seek to promote or reinforce local distinctiveness" (para 60) and permission should be "refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions" (para 64). In addition policy CS5 provides that "*All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area*" and echoes the provision of the NPPF.
56. Objections have been received stating that the site is currently an open field and that dwellings of the design, scale and density of the proposal, particularly in reference to the fact that the majority of the properties are two storey dwellings potentially being built on site is considered to be inappropriate and urban in form and not in keeping with the rural design and feel of the locality.

57. The applicant has submitted a full application showing 64 dwellings with the majority of these being houses, although there is a limited supply of bungalows on site. The houses range in size with some of them being semi-detached, others being split into flats and other being single dwelling houses and they are mixed throughout the site. This gives a density of 21 dwellings per hectare. The applicant has shown that 35% of these dwellings are affordable and they are of a specification, location and tenure that is acceptable to the Council's Affordable Housing Officer.
58. The dwellings that surround the site are predominantly of 20th century construction and are in the main modern estate type houses. The dwellings as proposed are not mock traditional Suffolk properties but have been designed using the local Suffolk style in terms of the proportions, roof style and detailing and the finish of the properties and are similar in style and proportion to the existing estate style properties that surround parts of the site. Objectors have asked for the numbers of bungalows proposed to be increased as they consider that this would make the development more in keeping with the locality. They say that this increase would also meet the findings of the emerging Neighbourhood Plan. However, as stated above, the residential form of this part of Thurston is modern housing and as such what is proposed by the applicant is in keeping with this and there is no need to redesign the layout to incorporate more bungalows. As stated above, the Neighbourhood Plan is at an early stage and has yet to have any policies for consideration and is some way off from its referendum and as such only limited weight can be apportioned to it as advised by the NPPF. As this is the case, and it has been established that the proposal is in keeping with the house styles in the locality that it would not be a defensible decision to make the applicant alter the scheme to provide more bungalows.
59. In terms of the layout of the site, a single road is proposed through the site with the estate road forming a loop back to the access. These are a mixture of adopted highway and private driveways and in terms of the layout, this is not considered to be dissimilar to what is seen in the modern development in the modern estates that neighbour the site. The site has substantial landscaping and hedging around it and the applicant is using this and supplanting it to ensure that the scheme minimises its impact on the surrounding area and helps it to integrate with the surrounding open countryside to the north. The density of the scheme of the scheme is also considered to be appropriate to its location and it cannot be considered to be a dense form of development as referred to by some of the objectors. The Police initially raised concerns in relation to the amount of hedging and trees proposed within the site as this could provide opportunities for crime. However, it is considered that the specific specification of the applicant's landscaping scheme can be provided via a planning condition if this scheme is approved and this matter can be addressed as part of that scheme.
60. Having regards to the above, it is considered that the scheme in terms of the style, density and layout of the properties as proposed constitutes good design in line with the requirements of the NPPF and local policy CS5 as it proposes a form of development that would reflect the character and appearance of the surrounding settlement.

Parish Plan / Neighbourhood Plan

61. A Neighbourhood Plan designation was confirmed in 2013 and covers the Parish of Thurston. At the time of the consideration of this proposal the parish have set up a neighbourhood Plan Committee to prepare the policies for the new Neighbourhood Plan. Both the Parish Council and their Neighbourhood Plan Committee have

objected to this scheme with the latter raising objections based on some of the early work that they have carried out for the evidence base for the new plan. The objectors to the scheme have gone as far as saying that they think that this scheme should either be refused or held in abeyance until the Neighbourhood Plan comes forward.

62. The Planning Practice Guidance identifies that *“Paragraph 216 of the National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan. The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals. And all representations on the proposals should have been submitted to the local planning authority by the close of the local planning authority’s publicity period. It is for the decision maker in each case to determine what is a material consideration and what weight to give to it”*.
63. As such, whilst it is ultimately for Members to determine the weight that should be given to the plan, whilst it is at an early stage in its development, it is the view of Officers that little material weight can be given at this time.

Landscape Impact

64. Paragraph 58 of the NPPF states that proposals should provide appropriate landscaping to ensure that they integrate well into the surrounding locality. This requirement is repeated in one of the requirements of policy H13 of the Mid Suffolk District Local Plan.
65. Objections have also been received on the basis that the proposal will extend the built up footprint of the village into the surrounding open countryside which is unacceptable to the objectors and the parish council and that the applicant’s landscaping scheme is lacking in detail.
66. The field that is the subject of this proposal has residential development to its west and south, two properties on the northern elevation and further properties to the north along Meadow Lane. Whilst the site is a field, it does not enjoy an open aspect on all elevations. Currently, the field to the east is open, but that is the site of the proposed Pigeon Housing development and as such if that site is approved this proposal will have very little countryside aspect. Furthermore, the application site is predominantly enclosed by hedging and trees which further contributes to the feeling that it is enclosed rather than being ‘open countryside’.
67. The Council has sought comments from its Landscape Consultant on the scheme and having regards to the above they have not objected to this proposal. The Landscape Consultant has commented that due to the location of the site and what surrounds it, both built and natural features that the development of this site will not have a negative impact on the surrounding countryside and will not give the feeling that the scheme juts out into the Countryside as referred to by the objectors. The Landscape Consultant has commented that the specific details of the applicant’s landscaping scheme can be successfully controlled by planning conditions.
68. Objectors to this scheme have raised concerns that the development may harm the root zones of some of the trees that lie along the field boundary or within the gardens

of the neighbouring properties. The Council's Tree Officer has been consulted on this scheme and he has not object to it and the trees referred to be the objectors can be protected during construction by suitable fencing which can be controlled by a planning condition.

69. One objector has commented that this land is Greenbelt and land designated as such can only be developed in exceptional circumstances. It must be clarified that there is no Greenbelt land in Mid Suffolk and that the status of the site is as a green field and an assessment of the policy requirements and the physical impact of the scheme on the land is given in this report.
70. Having regards to the requirements of policy H13 of the MSDC Local Plan and paragraph 58 of the NPPF, it is considered that the scheme can use existing and provide suitable new screen landscaping both within and on the boundaries of the site to ensure that it assimilates well into the rural edge of Thurston and provides an attractive environment both for the new residents of the site and those living in the surrounding locality. It is unfortunate that part of an existing hedge from Norton Road has to be removed to facilitate the new access into the site and this dis-benefit will be considered when weighing up at the end of the report as to whether the proposal constitutes sustainable development.

Residential Amenity

71. Policies within the adopted development plan require, inter alia, that development does not materially or detrimentally affect the amenities of the occupiers of neighbouring properties. This requirement is emphasised in the NPPF Core Values in paragraph 17 where it states that all schemes should seek a good standard of amenity for all existing and future occupants of land and buildings.
72. A number of points have been raised by the objectors to this scheme in terms of its impact on their residential amenity (or living conditions). In the main, these relate to the fact that in some parts of the site, two storey dwellings will face an existing bungalow, and some of the new properties will overlook existing gardens and street lighting will alter the night time outlook for existing residents. It has also been commented that the change in the land from agriculture to residential will negatively impact on a resident's outlook.
73. The existing properties to the west of the site are screened by existing hedging which is to be retained as part of this proposal. The dwellings that are proposed adjacent to Ryland Close are designed so that they are side on to the garden boundary so that overlooking and loss of privacy is minimised. The existing dwellings that are further north along the western boundary of the site face west/east but are separated from the proposed dwellings by their long rear gardens and the screen landscaping along the current field boundary which is to be retained. The closest dwelling to the site on Cedars Close (no.1) is at an oblique angle to plot 25 and is to be screened by the existing trees and hedging and also there will be a boundary treatment at this point. All of this will minimise the impact of loss of privacy and overlooking to this occupier. Meadow Lodge Cottage currently has an open southern aspect with views directly into the application site. This will change as part of this proposal with a screen hedge/boundary treatment being erected along the current boundary between the field and the site. The dwelling directly to the south of this site is to be orientated west/east whilst Meadow Lodge Cottage is orientated north/south so that there won't be any habitable windows facing each other. Whilst it is regrettable that the open aspect currently enjoyed by Meadow Lodge Cottage is to be lost; however it must be remembered that this aspect is not within the control of the occupier of Meadow

Lodge Cottage and the owner of the application site could have erected a fence or planted tree/hedging along this boundary at any time in the past without the need for planning permission.

74. In terms of loss of daylight and sunlight, the existing properties along the western boundary including the dwellings on Cedars Close are screened by existing trees and landscaping and it is not considered that the site layout or the dwellings as proposed will impact on this significantly greater. Meadow Lodge Cottage will still be open to its east and will enjoy sunlight throughout most of the day. Sunlight is likely to be disturbed in the evening due to the increase landscaping cover that is proposed to the west, but this is not considered to be to a significant enough level which would warrant the refusal of this scheme.
75. Objectors consider that the street lighting associated with the dwellings will be intrusive and have a negative impact on their living conditions. It is clear that allowing permission for this scheme will alter the locality as the field is currently dark and this will change. However, the street lighting will be within the site and not directly adjacent to the existing properties and designed to the requirements of the Highway Authority. As such this should have a minimal impact on the living conditions of the surrounding occupiers.
76. A condition on any permission that the council may grant on this proposal can be imposed requesting that the applicant enters into a construction management agreement with the Council to safeguard the living conditions of the surrounding occupiers during the construction phase of the scheme.
77. The layout and the detailed design of the properties do not give rise to any significant concerns in terms of loss of neighbour amenity, either in terms of privacy; loss of daylight and sunlight and due to the distance and the orientation of the properties there is no need for the applicant to redesign the scheme to incorporate more bungalows. Having regards to the above, the proposal is considered to meet the relevant NPPF core value in paragraph 17 and the requirements of paragraph 123 in terms of providing a suitable level of amenity for all.

Environmental Impacts - Trees, Ecology And Land Contamination

78. The application site is part grade 3b and part grade 5 agricultural land which is currently in use for agricultural purposes. As the site is in an agricultural use, there is limited tree cover within the site, other than a hedge which splits the location of the polytunnels and the glasshouses from the adjacent open field with the majority of the trees running along the site boundary.
79. Objections have been received to this scheme from local residents and the Suffolk Wildlife Trust on the basis that the development of the site will impact on biodiversity and that consideration needs to be given to the mitigation for this harm. Mention has been made that there is concern that either part, or all of the hedge along the Norton Road frontage is to be removed and this will impact on the biodiversity that it holds. The Wildlife Trust also considers that the site would be suitable for Skylark nesting and that a suitable mitigation scheme is required to compensate for this loss.
80. Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) provides that all "competent authorities" (public bodies) to "have regard to the Habitats Directive in the exercise of its functions." In order for a Local Planning Authority to comply with regulation 9(5) it must "engage" with the

provisions of the Habitats Directive.

81. The content of paragraph 118 of the NPPF is also applicable to the consideration of this proposal, as it states that when determining planning applications, consideration must be given to 6 principles. Two of those principles are particularly relevant to the consideration of this proposal, being;
 - a. If significant harm is caused which cannot be avoided or mitigated by conditions then planning permission should be refused.
 - b. Opportunities to integrate biodiversity in and around developments should be supported.
82. The Council's Consultant Ecologist has been consulted on this application and they have confirmed that the site contains priority habitat. They have advised that they are satisfied with the applicant's Ecological Report and requests that conditions are imposed to limit the level of lighting on site and to ensure that the scheme is carried out in accordance with the recommendation of the ecology report. In coming to this conclusion, the Consultant Ecologist is aware of the Local Highway Authority's requirements to remove part of the hedge on Norton Road to facilitate the access visibility splay (it is not proposed to remove it completely), but they are confident that the loss of habitat can be compensated for within the site. In terms of Skylarks, the Consultant Ecologist notes that due to the former use of the site as a commercial nursery and that the remainder of it has been used for pasture for sheep that it would be an unsuitable location for Skylarks to nest. As such, they do not consider it necessary or appropriate in this situation to request a mitigation scheme as suggested by the Wildlife Trust.
83. Paragraph 112 of the NPPF states that local authorities should take into account the economic and other benefits of the best and most versatile agricultural land when making planning decisions. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use poorer quality land in preference to that of higher quality land. Agricultural land is split into categories with land defined as 3a up to 1 being best and most versatile land and grades 3b down to 5 not being defined as best and most versatile land. The application site is part 3b and part grade 5 and as such it is not defined as best and most versatile agricultural land and its development meets the requirements of paragraph 112 of the NPPF.
84. The Council's Contaminated Land Officer has been consulted on this scheme and he has reviewed the documentation submitted by the applicant (Phase 1 risk assessment). Paragraph 121 of the NPPF makes it clear that planning decisions should make sure that the site is suitable for its new use taking account the hazards of any previous use. The Contaminated Land Officer has not raised any objections to the scheme subject to the imposition of conditions requesting that the works on site be carried in line with the applicant's contamination report.
85. Mention has been made that if this scheme is approved, the increase number of vehicles that will come from the new development will worsen air quality in the locality. This matter has been discussed with the Council's pollution control officer and he does not consider that air borne pollution will increase to a significant enough level from this scheme alone, or where it is considered with the other 4 sites in Thurston to exceed clean air standards. As such, he does not object to this proposal on air quality grounds.

86. Having regards to the above it is considered that the proposal complies with the requirements of paragraph 112 of the NPPF in terms of agricultural land, its effects on Priority Species can be mitigated and the landscaped areas within the site can be adequately maintained in the future to protect their biodiversity value.

Heritage Issues (The Setting Of Neighbouring Listed Buildings)

87. Both the NPPF and Core Strategy place significant emphasis on safeguarding heritage as an important component of sustainable development.
88. With reference to the treatment of the submitted application, the Council embraces its statutory duties and responsibilities in relation to listed buildings, notably the general duties under sections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires the local planning authority to have *“special regard to the desirability of preserving [a] building or its setting or any features of special architectural or historic interest which it possesses”*.
89. Recent case law on the application of the statutory duty acknowledges that the consideration of the impact of a proposed development on the significance of a designated heritage asset is a matter for its own planning judgement, but that the Local Planning Authority is required to give any such harm considerable importance and weight. However, where special regard to the desirability of preserving heritage assets has been paid and no harm is considered to be posed, the ‘balancing’ of harm (which should be given considerable weight as above) against public benefits as required by the NPPF, is not engaged.
90. Policy HB1 (Protection of Historic Buildings) places a high priority on the protection of the character and appearance of historic buildings, particularly the setting of Listed Buildings.
91. In paragraph 17 of the NPPF it makes it clear that development should *“conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations”*. Para 131 goes on to state that *“In determining planning applications, local planning authorities should take account of; the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.”* Furthermore Para 132 states *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.”*
92. An objector has commented that they are concerned that the applicant has not mentioned archaeology or heritage matters in his supporting statement and this scheme is likely to impact on both. However, no objections have been made to this scheme on Heritage grounds by the Council’s Heritage Officer and they have confirmed that due to the location of the site and the surrounding residential land uses that it will not affect the setting of any listed buildings in the locality. The proposal therefore complies with paragraph 132 of the NPPF.

93. As there are 5 different applications for major housing development in the northern part of Thurston, the Council's Heritage Officer has been asked to consider the cumulative impact of this scheme in relation to the others. Of the 5 applications, the application by Hopkins Homes for 175 homes (application 2798/16 and appeal 5010/16) and the one by Pigeon Capital (5070/16) are the only two out of the 5 that are considered to cumulatively have an impact on the settings of the listed buildings in the locality and this is assessed more appropriately in the reports for both of those applications.
94. The County Archaeologist has also been consulted on this scheme and they have not raised any objections to it. They are confident that should any remains be unearthed during the build process for the site that they could be recorded in line with County Council's requirements. This can be facilitated via a planning condition appended to the scheme.

Environment And Flood Risk

95. Paragraph 100 of the NPPF makes it clear that inappropriate development in areas of flood risk should be avoided by directing development away from areas of highest risk. The contents of policy CS4 of the Mid Suffolk Core Strategy is in line with the requirements of the NPPF in terms of flood risk and carries significant weight in the determination of this application. In terms of flooding from rivers, the site complies with local and national policy as it lies in a flood zone 1 area which is land at least risk of flooding.
96. Objections have been received raising concerns that the development of the site may cause localised floods in the area. Anglian Water and the County Flood and Water team have been consulted on this proposal. Neither Anglian Water, the Environment Agency or the County Flood and Water team have objected to this proposal. They have advised that permission can be granted subject to the imposition of conditions requiring the scheme to be built in line with the submitted drainage strategy and details.
97. Due to unprecedented level of growth currently suggested for Thurston, the Environment Agency, County Flood and Water team and Anglian Water have been specifically asked to consider the cumulative impact of this proposal on drainage, flood risk and water supply grounds. The Environment Agency and the County Suds team have advised that an increase of 827 dwellings with the mitigation measures proposed by the applicants will not increase flood risk in terms of surface water drainage in the locality to an unacceptable level. Confirmation has also been received that there is capacity in the local pumping station to serve 827 new dwellings in terms of sewage needs. Thurston lies in an area where water supply can be an issue, however Anglian Water has a duty by law to supply new houses with a water supply and this is a matter for them to resolve under their legislation.
98. Having regards to the above, it is considered in terms of flood risk, water supply and drainage that the scheme when either considered singularly or cumulatively can be made acceptable subject to the imposition of a suitably worded condition to meet the requirements of paragraph 100 of the NPPF and policy CS4 of the Mid Suffolk Core Strategy.

Infrastructure - Planning Obligations / CIL contributions

99. Objections have been received to this scheme on the grounds that the local infrastructure, which includes the local schools and health care, is insufficient to meet

the need of the residents of this proposal. Comment has been made that if the scheme is approved without suitable provision, it will cause significant impact on the existing community of Thurston.

100. The Council has now implemented CIL which accordingly takes on board requirements such as open space contribution, NHS and education contributions.
101. As part of this proposal the contributions will be sought under the Council's CIL Scheme for improvements to the following:
102. For the future expansion of the doctor's surgery in Moreton Hall which the residents of this scheme would use.
 - For improvements to the local library provision.
 - Safety improvements to the Thurston Railway station.
103. Objections have been received to this scheme on the grounds that a new doctor's surgery will not be provided and that the proposal will cause capacity issues at the local surgeries. It should be noted that the Primary Care Trust (PCT) has made it clear that due to the existing situation with doctors, their salaries and contracts and the government's policy in terms of the NHS that a new doctor's surgery will not happen in Thurston as part of any of the 5 schemes. The PCT will be requesting contributions through CIL in relation to all 5 schemes and the monies will be used to improve the service offered and/or improve the facilities at either the Woolpit Surgery or at the Park Farm Surgery in Moreton Hall to meet the expected needs of the additional residents of the new dwellings in Thurston. They have specified that they will seek a contribution towards improvements at the Woolpit Surgery in relation to this proposal.
104. It has been identified following discussion with the County Infrastructure Officer that as suggested by the objectors and the Parish Council, there is no capacity in the local primary school to expand and as such a contribution of £246,435 is required towards the building of a new 420 place two form primary school either on the Persimmon or the Pigeon site elsewhere in the village. It has also been suggested that a further £49,998 is required for the provision of new pre-school, which will be accommodated at the new school to help meet the demand generated by this development. As the CIL 123 list does not include the provision of new pre-school or primary school facilities (it only covers extensions to existing establishments) these contributions will have to be sought under S106 of the Planning Act and the applicant has agreed to the above payments.
105. The County Council has also clarified that whilst the new school is being built, the existing primary school in Thurston will be provided with two temporary classrooms funded via CIL to cope on a 2 to 3 year period with the increase in pupils generated from the first phase of new housebuilding in Thurston (from any of the 5 sites currently under consideration) until the new school is built. Once that happens, the existing school will be closed and the existing pupils moved over to the new school and the new school will be extended as appropriate up to a capacity of 420 pupils to accommodate the primary school age children arising from any of the proposed housing sites in Thurston. It is understood that the Diocese who own the primary school have committed to ploughing the capital receipt that they receive for the development of the existing school site into the new school which is also to be funded by a joint contribution by all 5 of the developers proposing major housing schemes currently in Thurston.

106. Following further dialogue with the County Obligations Manager it is understood that progress is being made to secure options on the potential school sites proposed in other applications. The delivery of a new primary school is a necessary pre-requisite to mitigate the potential pressure on education infrastructure from the development and it has been agreed that a restrictive phasing condition is not necessary given the progress that has been made on options. Nevertheless the securing of a primary school site is a material consideration upon which the delivery of this development is predicated.
107. The County Council has confirmed that there is capacity at all of the catchment secondary schools in the locality and as such a financial contribution towards new facilities is not warranted in that instance.
108. As is the case for new education buildings, affordable Housing is not part of CIL and members should note that policy to seek up to a 35% provision remains in effect. The applicant has confirmed that they are agreeable to provide a policy compliant scheme for affordable housing and that this will be achieved via a Section 106 contribution and the Council's Strategic Housing Officer has not objected to this proposal.
109. Network Rail has been consulted on this scheme and has asked for a contribution of £1million through a S106 agreement between all five developers to close the existing level crossing and to provide safer and improved facilities at Thurston Railway Station having regards to the increased use of the facilities that will occur from the residents of the proposed 827 dwellings. The Council's CIL 123 list includes provision for improvements to transport infrastructure. As such it is considered that it would be appropriate for Network Rail to bid for the specified amount to make the improvements they have requested to improve pedestrian safety at the station under the CIL scheme.
110. The Highway Authority has, as stated earlier in the report, asked for £37,277 under section 106 of the Planning act to pay for Laurence Homes' part of the contribution for works to the highway infrastructure to ensure that the impact of approving all 5 housing schemes totalling 872 houses in Thurston is not severe on the highway network as referred to in paragraph 32 of the NPPF.
111. It is noted that within the application site there is an open space and landscaped areas and this will be maintained by a management company and delivered via a S106 agreement. None of it is to be transferred to the Council or the Parish Council as part of this or any of the other 4 schemes.
112. Having regards to the above, in accordance with the Community Infrastructure Levy Regulations, 2010, the obligations recommended to be secured above by way of a planning obligation deed are (a) necessary to make the Development acceptable in planning terms (b) directly related to the Development and (c) fairly and reasonably relate in scale and kind to the Development.
113. An objector has commented that Thurston is already an area of low water pressure and that additional houses on the water network will make the situation even worse. Anglian Water has a duty under the water regulations to supply new dwellings and they have legal powers to put measures in place to resolve this matter.
114. In response to an objector comments, it would be unreasonable to expect the developer of this or any other application to not build the properties and wait for all of the necessary infrastructure to be in place first. It would also be unreasonable to

refuse planning permission for this and the other schemes where the developers have agreed to fund works to resolve the infrastructure issues identified. To ensure that the correct level of infrastructure appears at the correct time, the Council and its partners will work with the developers so that appropriate triggers are in the S106 legal agreements to ensure this happens.

Other Issues

115. Objections have been made to this scheme on the grounds that there are other more suitable sites elsewhere (sites towards the south of the railway line have been mentioned) and these should come first. It must be remembered that each planning application must be considered under its own planning merits and specifically in terms of housing; there is no national requirement for a sequential test for preferred housing sites within an area.
116. An objection has been received on the basis that the proposal will turn Thurston from a village into a town. Whilst Thurston will get larger as a consequence of additional housing growth, its status will remain as a village and it does not automatically turn into a town. This objection is not considered to be material in the consideration of this proposal.
117. An objector has stated that this proposal should be refused until all existing houses that are in for sale in Thurston are occupied and as such a housing deficit is created. National housing policy is not based on this scenario and to follow the requirements of the objector would result in a decision that would be contrary to both local and national policy and it would not be defensible at appeal.

Details Of Financial Benefits / Implications (S155 Housing and Planning Act 2016)

- Council Tax payments from the dwellings when built
- Planning Delivery Grant from Central Government for delivering the dwellings
- S106 Agreement:
 - £246,435 is required towards the building of a new primary school in Thurston.
 - £19,410 towards the cost of the land to provide the new primary school.
 - £49,998 is required for the provision of new pre-school facility in Thurston
 - £37,277 is required for highway infrastructure works
- CIL payments per dwelling built on site.

PART FOUR – CONCLUSION

Planning Balance

118. The proposal for residential development off Norton Road in Thurston is considered to be contrary to the adopted Mid Suffolk Core Strategy as the application site lies within the countryside outside the built framework of the settlement of Thurston on what is agricultural land.

119. However, as the housing policies in the Core Strategy are out of date due to the Council not having a deliverable five year supply of housing, this scheme falls to be considered in relation to paragraph 14 and 49 of the NPPF which relate to residential development and sustainable development.
120. Paragraph 14 states that where the development plan for the area is out of date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole or specific policies in the NPPF which indicate that the development should be restricted. Whilst it has been identified that the proposal either when considered on its own or in combination with the four other residential schemes that are with the Council for consideration will have an adverse impact on the quality of the landscape character of the area, and that it will result in the irreplaceable loss of countryside and the loss of grade 3b and grade 5 agricultural land, will result in the loss of part of a hedge which provides habitat to protected and priority species and has a potentially severe impact on parts of the highway network if not mitigated, it is considered that the benefits that the scheme brings such as the provision of 64 new houses of which 35% of them will be affordable, contributions towards local infrastructure such as the highways improvements, and a new primary school outweighs the negative issues.
121. Significant weight must also be given to the fact that there are no unresolved objections from the Council's consultees to the scheme. There are no objections in terms of design; crime prevention; amenity; pollution; contamination; ecology; landscape; flood risk and drainage. The proposal will also help to deliver construction jobs and will also provide more residents who will help to sustain and potentially grow the local economy.
122. In relation to highways impacts there are road safety impacts which can be addressed through mitigation at Fishwick Corner and other highways infrastructure improvements which weigh in favour of the scheme by providing enhanced sustainable links.
123. There remains a road safety and capacity issue at the A143 Thurston Road junction (adjacent to The Bunbury Arms). A number of solutions have been investigated and the current preferred solution is traffic signals. The highway authority consider that the effects of the development can be mitigated but further detailed work needs to be undertaken to obtain the most practicable and viable solution to address the risks. For this reason Committee is asked to reach a "minded to" resolution which reserves the local planning authority's position pending the outcome of that detailed further investigation and junction design. Once the outcome of this investigation is known the application can be reported with a substantive recommendation to Committee.
124. Therefore, it is considered having regards to paragraph 14 of the NPPF that the benefit the proposal brings outweighs the negatives. Furthermore, when assessing the proposal against the NPPF it is not contrary to its requirements as a whole and there are no specific policies within it that would restrict this development and as such it is considered that it constitutes sustainable development which should be approved planning permission without delay in line with the requirements of paragraph 14.

Statement Required By Article 35 Of The Town And Country Planning (Development Management Procedure) Order 2015.

125. When determining planning applications The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain how, in dealing with the application they have worked with the applicant to resolve any problems or issues arising.
126. In this case the planning authority has worked with the applicant to overcome highway objections to the scheme and to clarify issues relating to drainage and impact on listed buildings.

Identification of any Legal Implications of the decision

127. There are no known legal implications derived from the determination of this application.
128. The application has been considered in respect of the current development plan policies and relevant planning legalisation. Other legislation including the following have been considered in respect of the proposed development.
- Human Rights Act 1998
 - The Equalities Act 2012
 - Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
 - Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
 - The Conservation of Habitats and Species Regulations 2010
 - Localism Act
 - Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

RECOMMENDATION

That Committee express a “minded to” resolution, subject to the further investigation and reporting back of highway matters in relation to the A143 Thurston Road junction, on the following basis:

That the authority would be minded to delegate to the Corporate Manager - Growth & Sustainable Planning to grant full planning permission subject to the prior completion of a Section 106 or Undertaking on terms to his satisfaction to secure the following heads of terms:

- £246,435 is required towards the building of a new primary school in Thurston.
- £19,410 towards the cost of the land to provide the new primary school.
- £49,998 is required for the provision of new pre-school facility in Thurston
- 35% Affordable Housing to be transferred over to a Registered Provider
- £37,277 to secure off site highway improvement works as listed below:
 - Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £22249 is required on commencement of construction work on site.
 - Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road. A contribution of £4040 is required on commencement of the first dwelling.

- Contribution towards provision of pedestrian crossing facilities at the junction of Norton Road / Station Hill / Ixworth Road. A contribution of £6988 is required on commencement of the first dwelling.
- Contribution towards bus stops on Norton Road. A contribution of £4000 is required on commencement of the first dwelling.
- Setting up of a management company to look after the open space and Sustainable Drainage parts of the scheme.

and that such permission be subject to the conditions as set out below:

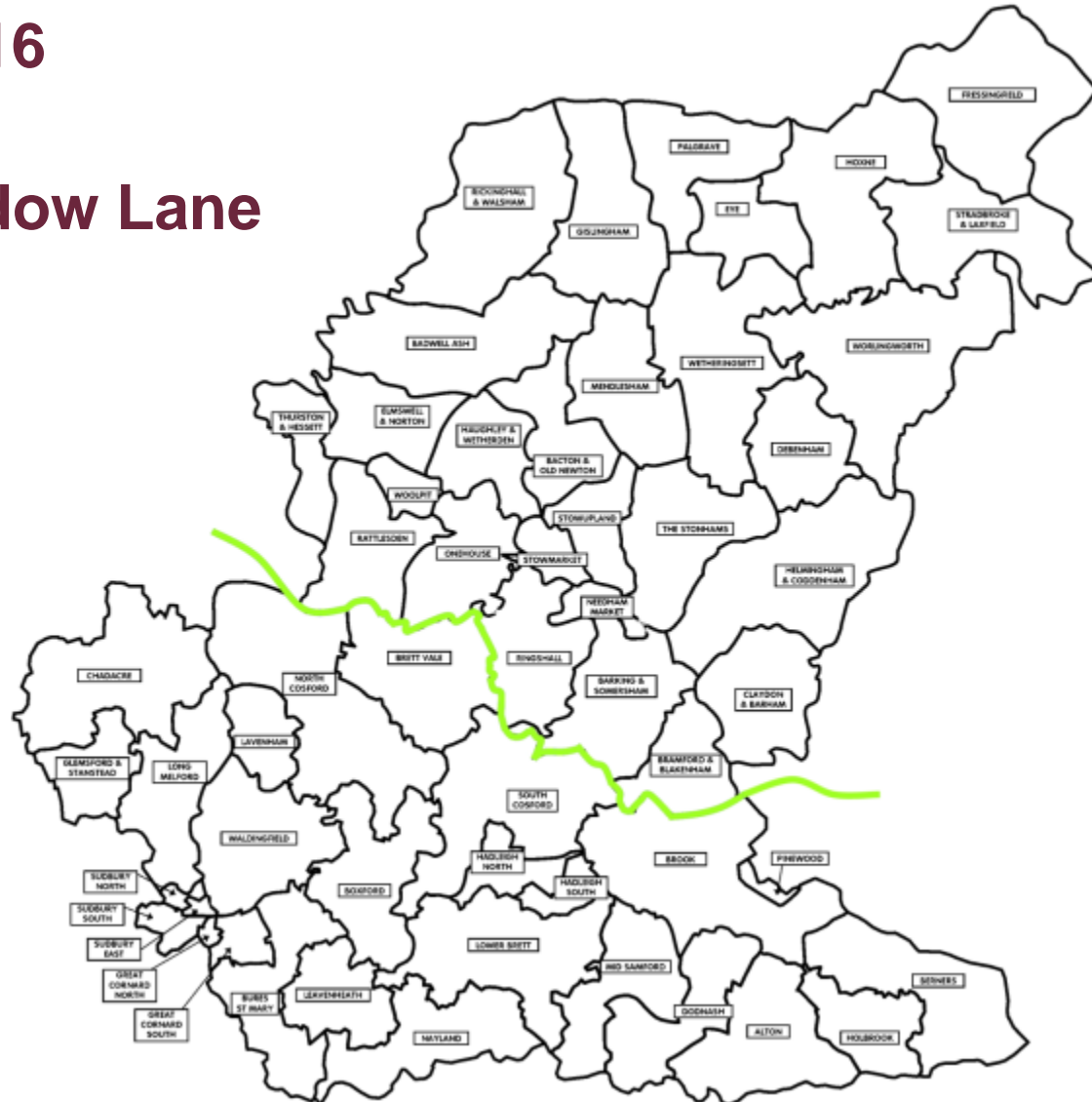
- 1) Two year time start time (as opposed to the usual 3)
- 2) Existing tree protection
- 3) Construction management agreement
- 4) External lighting
- 5) Commencement period for landscaping
- 6) Protection of birds during construction period
- 7) Works to be carried out in line with the ecological report.
- 8) Materials
- 9) Landscaping
- 10) Residential boundary treatment
- 11) Highway Conditions (site access, estate road layout, refuse bins & highway drainage & residential travel plan)
- 12) Surface water drainage
- 13) Foul water drainage
- 14) Fire Hydrant requirements
- 15) Archaeology

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Application No: 4942/16

**Address: Land At Meadow Lane
Thurston
IP31 3QG**

Page 505





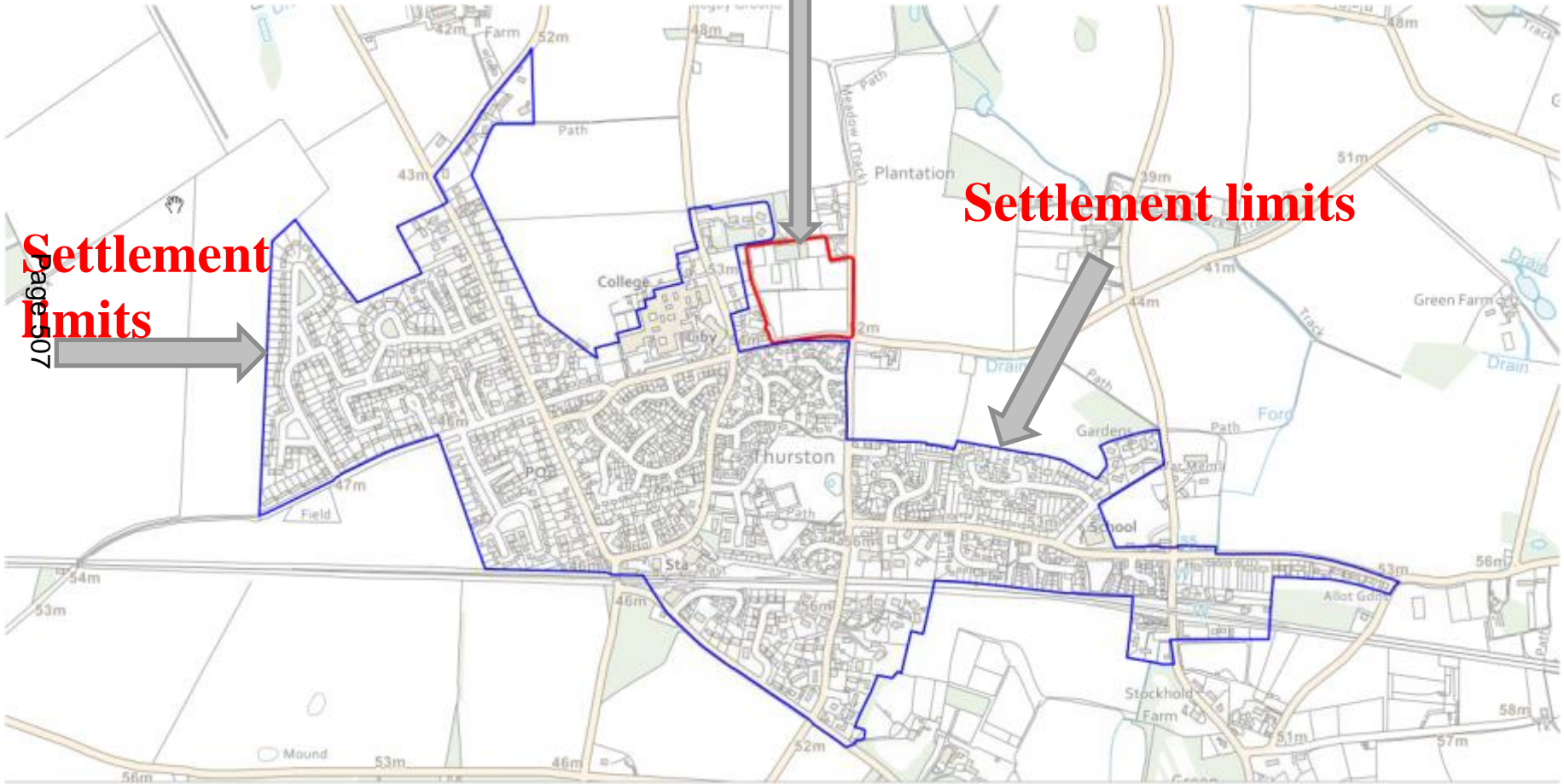
Verbal Updates:

- Confirmation and summary of any 3rd Party representations received not previously issued to members.
- Confirmation and summary of any consultee responses received not previously issued to members
- Confirmation of any changes to recommendation, conditions or reasons.

Laurence Homes

Settlement limits

Settlement limits



Location Plan & Constraints Map

Slide 4

Page 508



Title: Committee Site Plan
Reference: 4942/17
Site: Land at Meadow Lane
 Thurston IP31 3QG



MID SUFFOLK DISTRICT COUNCIL
 131, High Street, Needham Market, IP6 6DL
 Telephone: 01449 724500
 email: customerservice@csd.cok
www.midsuffolk.gov.uk



SCALE 1:2500

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Date Printed : 16/06/2017

Front Elevation
1:100

Side Elevation (Rear)
1:100

Floor Plan
1:100

6750 (Street)
6750 to 7100 (to 7100)

6840 to 5296 (to 5296)

Floor Area: (63.0m² Finished)

1:100 scale bar

Rear Elevation
1:200

Note:
Roof pitches and materials may vary. See street scenes.

1:200 scale bar

| | | | | | |
|--|---------------|--|--|---------------------|----------------|
| <p>BDG DESIGN (SOUTH) Ltd Southway House 29 Southway, Colchester Suffolk CO1 1BB Tel: 01206 561436 Fax: 01206 574821 E-Mail: cad@bdg-design.co.uk</p> | <p>CLIENT</p> | <p>PROJECT Meadow Lane, Thurston</p> <p>DRAWING TITLE 2BB 2B 3P Bungalow - Affordable Plans and Elevations</p> | <p>DRAWING STATUS PLANNING</p> <p>REVISIONS</p> | | |
| <p>No dimensions are to be scaled from this drawing. All written dimensions to be checked by the contractor and any discrepancies notified immediately to BDG</p> | | | | | |
| | | <p>SCALE 1:200 1:100</p> | <p>DATE Nov '16</p> | <p>DRAWN FT</p> | <p>CHECKED</p> |
| | | <p>NUMBER 15.033/102</p> | <p>REV.</p> | | |

Selection of house types



| | | | | | | | | | | | | |
|---|-----------------|--|---|--|-------------------------|-----------------|-------------|---------|-----------------------------|--|--|------|
| <p>BDG DESIGN (SOUTH) Ltd Southway House 29 Southway, Colchester Essex CO2 7SA Tel: 01206 591408 Fax: 01206 591401 E-Mail: cad@bdg-design.co.uk</p> | <p>CLIENT</p> | <p>PROJECT Meadow Lane, Thurston</p> <p>DRAWING TITLE 2B 4P House - Affordable Plans and Elevations</p> | <p>DRAWING STATUS PLANNING</p> <p>REVISIONS</p> | <p>No dimensions are to be scaled from this drawing. All written dimensions to be checked by the contractor and any discrepancies notified immediately to BDG.</p> <table border="1"> <tr> <td>SCALE 1:200 1:100</td> <td>DATE Nov '16</td> <td>DRAWN FT</td> <td>CHECKED</td> </tr> <tr> <td colspan="3">NUMBER 15.033/103</td> <td>REV.</td> </tr> </table> | SCALE 1:200 1:100 | DATE Nov '16 | DRAWN FT | CHECKED | NUMBER 15.033/103 | | | REV. |
| SCALE 1:200 1:100 | DATE Nov '16 | DRAWN FT | CHECKED | | | | | | | | | |
| NUMBER 15.033/103 | | | REV. | | | | | | | | | |

Selection of house types



| | | | | | | | | | | | | |
|---|-----------------|---|---|--|-------------------------|-----------------|-------------|---------|-----------------------------|--|--|------|
| <p>BDG DESIGN (SOUTH) Ltd Southway House 20 Southway, Colchester Essex CO2 7BA Tel: 01206 561436 Fax: 01206 574671 E-Mail: oad@bdg-design.co.uk</p> | <p>CLIENT</p> | <p>PROJECT Meadow Lane, Thurston</p> <p>DRAWING TITLE 3B 5P House - Affordable Plot 57 Plans and Elevations</p> | <p>DRAWING STATUS PLANNING</p> <p>REVISIONS</p> | <p>No dimensions are to be scaled from this drawing All written dimensions to be checked by the contractor and any discrepancies notified immediately to BDG</p> <table border="1"> <tr> <td>SCALE 1:200 1:100</td> <td>DATE Nov '16</td> <td>DRAWN FT</td> <td>CHECKED</td> </tr> <tr> <td colspan="3">NUMBER 15.033/106</td> <td>REV.</td> </tr> </table> | SCALE 1:200 1:100 | DATE Nov '16 | DRAWN FT | CHECKED | NUMBER 15.033/106 | | | REV. |
| SCALE 1:200 1:100 | DATE Nov '16 | DRAWN FT | CHECKED | | | | | | | | | |
| NUMBER 15.033/106 | | | REV. | | | | | | | | | |



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|---|------------------|---|--|--|-------|---------|-------|---------|-------|---------|----|--|--------|------|--|--|-------------------|--|--|--|
| <p>BDG DESIGN (SOUTH) Ltd Southway House 29 Southway, Colchester Essex CO1 1DA Tel: 0206 561408 Fax: 0206 574021 E-Mail: south@bdg-design.co.uk</p> | <p>CLIENT</p> | <p>PROJECT</p> <p>Meadow Lane, Thurston</p> | <p>DRAWING STATUS</p> <p>PLANNING</p> | <p>No dimensions are to be scaled from this drawing All written dimensions to be checked by the contractor and any discrepancies notified immediately to BDG</p> <table border="1"> <tr> <td>SCALE</td> <td>DATE</td> <td>DRAWN</td> <td>CHECKED</td> </tr> <tr> <td>1:200</td> <td>Nov '16</td> <td>PT</td> <td></td> </tr> <tr> <td>NUMBER</td> <td colspan="3">REV.</td> </tr> <tr> <td>15.033/109</td> <td colspan="3"></td> </tr> </table> | SCALE | DATE | DRAWN | CHECKED | 1:200 | Nov '16 | PT | | NUMBER | REV. | | | 15.033/109 | | | |
| | | SCALE | DATE | | DRAWN | CHECKED | | | | | | | | | | | | | | |
| 1:200 | Nov '16 | PT | | | | | | | | | | | | | | | | | | |
| NUMBER | REV. | | | | | | | | | | | | | | | | | | | |
| 15.033/109 | | | | | | | | | | | | | | | | | | | | |
| <p>DRAWING TITLE</p> <p>House type 205 3B 5P house Plans and Elevations</p> | <p>REVISIONS</p> | | | | | | | | | | | | | | | | | | | |

Page 514

No alterations are to be made from this drawing. If any alterations are to be made, they must be approved by the planning authority and any alterations notified immediately to BDC.

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2
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5
6

15.033/200
A

BDC DESIGN (SOUTH) Ltd
 25, Railway Close
 25, Railway, Colchester
 Essex, CO1 1JL
 Tel: 0206 302 200
 Email: info@bdgdesign.co.uk

Meadow Lane, Thurston

Street Elevation
 Sheet 1 of 2

Date: 14/03/2015
 Time: 10:30 AM
 Scale: 1:500
 Project: 15.033/200
 Sheet: A

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From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 13 January 2017 15:16
To: Planning Admin
Subject: 4942/16 - Consultation Response

Application ref: 4942/16
Our ref: 205924

Dear Sir/Madam,

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,

Jamie Clarkson
Consultations

From: Infrastructure Team (Babergh Mid Suffolk)
Sent: 16 January 2017 14:48
To: Planning Admin
Subject: RE: Consultation on Planning Application 4942/16

This application would be subject to Community Infrastructure Levy (CIL). The residential rate of £115 (subject to indexation) would apply to the Gross Internal Area of the residential buildings. Affordable Housing should be secured by way of a s106 Agreement.

Kind Regards,

Nicola

Infrastructure Team
Babergh and Mid Suffolk District Council – Working Together

Tel: 01449 724563

From: Nathan Pittam
Sent: 17 January 2017 12:01
To: Planning Admin
Subject: 4942/16/FUL. EH - Land Contamination.

M3 : 188881

4942/16/FUL. EH - Land Contamination.
Land at, Meadow Lane, Thurston, BURY ST EDMUNDS, Suffolk.
Residential development consisting of 64 dwellings and associated highway, car parking and public open space.

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that the applicant has not submitted a Geoenvironmental Report outlining the potential risks posed by from previous uses of the site. The applicant has submitted a Geotechnical report by AF Howland Associates but this does not cover what is needed from the perspective of land contamination. Without this information I would be minded to recommend that the application be refused on the grounds of insufficient information.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715
m: 07769 566988
e: Nathan.pittam@baberghmidsuffolk.gov.uk

From: Iain Farquharson
Sent: 19 January 2017 15:55
To: Planning Admin
Subject: M3 188886: Consultation on Planning Application 4942/16

Dear Sir/Madam

We have reviewed the documents provided and are unable to find details as to the environmental impact mitigation/sustainability credentials of the proposed dwellings.

Policy CS3 encourages sustainable construction techniques such as using sustainable materials, minimisation of water use, suitable design to maximise solar gain and high levels of insulation to minimise energy use.

In addition the Overall Spatial Vision is:

"By 2021 the East of England will be realising its economic potential and providing a high quality of life for its people, including by meeting their housing needs in sustainable inclusive communities. *At the same time it will reduce its impact on climate change and the environment, including through savings in energy and water use and by strengthening its stock of environmental assets.*"

Core Strategy Objectives SO 8

New development will be of a high standard of design and layout and will address the need for energy and resource conservation.

We request the developer provide information as to their proposals in this area. Until satisfactory information is received the recommendation is refusal of permission.

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council



**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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

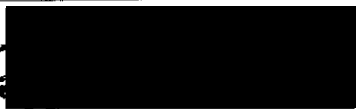
Council's Reference: 4942/16

Referring to the planning application referenced above, dated 13 January 2016, application for the residential development consisting of 6 dwellings and associated highway, car parking and public open space, Land at Meadow Lane, Thurston IP31 3QG, 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.¹

¹ Where relevant, further information will be provided within Annex A.

| | |
|--|-------------------------|
| Signature:  | Date: 23 January 2017 |
| Name: David Abbott | Position: Asset Manager |
| Highways England: Woodlands, Manton Lane Bedford MK41 7LW | |
| david.abbott@highwaysengland.co.uk | |



The Archaeological Service

Resource Management
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

Enquiries to: Rachael Abraham
Direct Line: 01284 741232
Email: Rachael.abraham@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_4942
Date: 23 January 2017

For the Attention of Jan Ward

Dear Mr Isbell

Planning Application 4942/16 – Land at Meadow Lane, Thurston: Archaeology

This site lies in an area of archaeological potential recorded on the County Historic Environment Record. The probable remains of a section of Roman road have been identified during archaeological investigations to the west (THS 007). Finds of prehistoric and medieval date have also been recorded in the vicinity (BSE Misc, THS 016, 025 and Misc). As a result, there is potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

Despite the large size of the proposed development area, and lack of previous systematic archaeological investigation, due to the impacts of previous land use, on balance there are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

From: RM Floods Planning
Sent: 23 January 2017 15:06
To: Planning Admin
Subject: 2017-01-23 JS Reply Land at Meadow Lane, Thurston IP31 3QG Ref 4942/16

Suffolk County Council, Flood and Water Management can make the following initial comment for this full application.

The application has conducted some infiltration tests and they have presented area that could be utilised for soakaways which they intend to utilise.

However, more detailed surface water drainage design information needs to be submitted for this full application for us to consider before a view can be given.
 The documents listed below need to be submitted for a full application, and the highlighted in red need to be submitted with the application.

| Pre-app | Outline | Full | Reserved Matters | Discharge of Conditions | Document Submitted |
|---------|---------|------|------------------|-------------------------|--|
| ✓ | ✓ | ✓ | | | 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 rd party agreement to discharge to their system (in principle/consent to discharge) |
| | | ✓ | | ✓ | Maintenance program and ongoing maintenance responsibilities |
| | | ✓ | ✓ | | Detailed development layout |
| | | ✓ | ✓ | ✓ | Detailed flood & drainage design drawings |
| | | ✓ | ✓ | ✓ | Full structural, hydraulic & ground investigations |
| | | ✓ | ✓ | ✓ | Geotechnical factual and interpretive reports, including infiltration test results (BRE365) |
| | | ✓ | ✓ | ✓ | Detailed landscape details |
| | | ✓ | ✓ | ✓ | Discharge agreements (temporary & permanent) |
| | | ✓ | ✓ | ✓ | Development management & construction phasing plan |

Kind Regards

Jason Skilton
 Flood & Water Engineer
 Suffolk County Council

Tel: 01473 260411
 Fax: 01473 216864

From: RM PROW Planning
Sent: 25 January 2017 14:00
To: Planning Admin
Cc: Christopher Fish; Claire Dickson
Subject: RE: Consultation on Planning Application 4942/16

Our Ref: W523/001/ROW974/16

For The Attention of: Ian Ward

Public Rights of Way Response

Thank you for your consultation concerning the above application.

This proposal does not directly affect Public Footpath 1, which is recorded nearby, so we have no objections to this proposal.

This response does not prejudice any further response from Rights of Way and Access. As a result of anticipated increased use of the public rights of way in the vicinity of the development, we may be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

Regards

Jackie Gillis
Green Access Officer
Access Development Team
Rights of Way and Access
Resource Management, Suffolk County Council
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

<http://publicrightsofway.onesuffolk.net/> | [Report A Public Right of Way Problem Here](#)

For great ideas on visiting Suffolk's countryside visit

From: Nathan Pittam
Sent: 27 January 2017 15:40
To: Planning Admin
Subject: 4942/16/FUL. EH - Air Quality Issues.

M3: 188884
4942/16/FUL. EH - Air Quality Issues.
Land at, Meadow Lane, Thurston, BURY ST EDMUNDS, Suffolk.
Residential development consisting of 64 dwellings and associated highway, car parking and public open space.

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of air quality.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715
m: 07769 566988
e: Nathan.pittam@babberghmidsuffolk.gov.uk
w: www.babergh.gov.uk www.midsuffolk.gov.uk



Midlands & East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF

Email address: kerryharding@nhs.net

Telephone Number – 0113 824 9111

Your Ref: 16/4942

Our Ref: NHSE/MIDS/16/4942/KH

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

27 January 2017

Dear Sirs,

**Residential development consisting of 64 dwellings and associated
highway, car parking and public open space.
Land at Meadow Lane, Thurston, IP31 3QG**

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' 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 64 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 are 2 GP practices within a 2km radius (or closest to/ within catchment) of the proposed development. These practices do 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 services 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 (or closest to/ within catchment) of the proposed development.

| Premises | Weighted List Size ¹ | NIA (m ²) ² | Capacity ³ | Spare Capacity (NIA m ²) ⁴ |
|-----------------------|---------------------------------|------------------------------------|-----------------------|---|
| Mount Farm Surgery | 12,244 | 768.40 | 11,206 | -71.19 |
| Woolpit Health Centre | 14,134 | 645.87 | 9,419 | -323.32 |
| Total | 26,378 | 1,414.27 | 20,625 | -394.51 |

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 120m² 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 at Woolpit Health Centre, servicing the residents of this development, by way of their phase 2 premises extension, 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 extend 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.

High quality care for all, now and for future generations

Yours faithfully,



Kerry Harding
Estates Advisor

High quality care for all, now and for future generations



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 (4942/16)

SITE: 64 Dwellings at land on Meadow Lane, Thurston

Applicant: Lawrence Homes

Planning Officer: Mr Philip Isbell

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.

Dear Mr Isbell

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of up to 64 dwellings on land at Meadow Lane, Thurston.

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 have a few concerns regarding the security of the development and have addressed them below. However, should these concerns be addressed, I would approve this design.

I strongly 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.

I would further 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/>

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

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

My specific observations for this development are that I applaud the developers for not densely siting these properties.

I agree as stated in the Design Access Statement (DAS) gaps between dwellings should be minimised.

I note from the DAS all current boundary hedging will be retained for rear gardens or side residential plots, however, I have concerns that such hedging will be too permeable for an offender to gain access and would prefer these perimeters, especially the area around plots

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RESTRICTED/CONFIDENTIAL

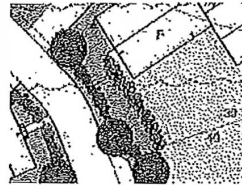
1, 10,11, 20-34, and 51-56 are enclosed by 1.8m close boarded fencing or at least 1.5m boarded fencing, enhanced by further 300cm trellis.

Vulnerable areas, such as exposed side and rear gardens need more robust defensive barriers, by using walls or fencing to a minimum height of 1.8m. Installing fencing to a high standard ensures security and longevity of the boundary. High quality fencing that lasts for a long time will provide security and reduce overall maintenance costs for residents or Landlords. A fence that has a long predicted life is also more sustainable.

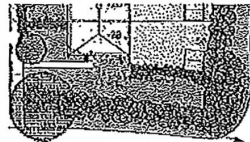
I have concerns at the vulnerability to theft of vehicles parked within the car ports at plots 43-44 and 57-59 (pictured right). I note there will be windows at the front of each property to provide some form of surveillance, but feel that as these areas are vulnerable during the dark hours, that security lighting should be installed to illuminate these areas.



I note by plots 39 and 40 two perimeters have been incorporated into the landscape design (pictured right). If such a proposal remains, this would create a dead space area for an offender to be shielded from view. I recommend that this outer perimeter should instead comprise of either 1metre picket fencing or metal railing to clearly define private from public spacing, but allow surveillance of the area in question.



I note that for plot 56, it has been stated that the current boundary perimeter with Meadow lane will remain (pictured right). Again there is a danger by having such vegetation, if not correctly maintained at a reasonable height of 1m high, this area will become overgrown and another area where an offender is shielded from view. I would therefore prefer low 1m fencing for this area.



I would also like to see 1 metre metal hooped railings or picket fencing around the communal areas.

On a final note I agree with the developers that a lack of shrub layer will facilitate pedestrian movement and allow natural surveillance of the area.

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.
- 2.13 One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19 under Local Development Framework and Community Strategy states:

A safe community: Protect the environment from pollution, flooding and other natural and man-made disasters; reduce the level of crime; discourage re-offending; overcome the fear of crime; and provide a safe and secure environment.

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 I agree as stated in the Design Access Statement (DAS) gaps between dwellings should be minimised.

3.2 I note from the DAS all current boundary hedging will be retained for rear gardens or side residential plots, however, I have concerns that such hedging will be too permeable for an offender to gain access and would prefer these perimeters, especially the area around plots 1, 10, 11, 20-34, and 51-56 are enclosed by 1.8m close boarded fencing or at least 1.5m boarded fencing, enhanced by further 300cm trellis.

3.3 Vulnerable areas, such as exposed side and rear gardens need more robust defensive barriers, by using walls or fencing to a minimum height of 1.8m. Installing fencing to a high standard ensures security and longevity of the boundary. High quality fence that lasts for a long time will provide security and reduce overall maintenance costs for residents or Landlords. A fence that has a long predicted life is also more sustainable.

3.4 I have concerns at the vulnerability to theft of vehicles parked within the car ports at plots 43-44 and 57-59 (pictured right). I note there will be windows at the front of each property to provide some form of surveillance, but feel that as these areas are vulnerable during the dark hours, that security lighting should be installed to illuminate these areas.



3.5 I note by plots 39 and 40 two perimeters have been incorporated into the landscape design (Pictured right). If such a proposal remains, this would create a dead space area for an offender to be shielded from view. I recommend that this outer perimeter should instead comprise of either 1metre picket fencing or metal railing to clearly define private from public spacing, but allow surveillance of the area in question.



- 3.6 I would also like to see 1 metre metal hooped railings, or picket fencing around the communal areas.
- 3.7 On a final note I agree with the developers that a lack of shrub layer will facilitate pedestrian movement and allow natural surveillance of the area.
- 3.8 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.
- 3.9 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.
- 3.10 All litter bins should be of a fire retardant material.
- 3.11 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.
- 3.12 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.
- 3.13 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 guidelines 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](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.

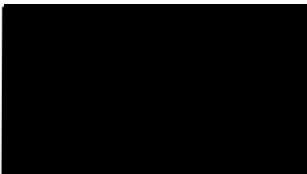
5.0 FINAL CONCLUSION

Should the concerns I have raised be addressed, I would approve this proposed design.

I hope the planners will adopt Secure By Design standards and apply for Secure by Design National Building Approval membership.

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

NEIGHBOURHOOD PLAN TEAM

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Councillor P Robinson
Chair of Thurston Planning Committee
Thurston Parish Council
New Green Centre
Thurston
IP31 3TG

Mr P Isbell
Corporate Manager, Development Manager
Mid Suffolk District Council
131 High Street
Needham Market
IP6 8DL

30th January 2017

Dear Cllr. Robinson,

4942/16 – Application for residential development consisting of 64 dwellings and associated highway, car parking and public open space @ land at Meadow Lane

Thank you for allowing the Neighbourhood Plan Team to comment on several planning applications that have been submitted to the Parish Council by a number of agents acting on behalf of Developers. The Neighbourhood Plan Team is aware that, with the submission of 6 applications (one is a duplicate) for a total of over 800 dwellings, Thurston is facing an immediate, exceptional planning issue. The Neighbourhood Plan Team is concerned that if the major applications now submitted are to be dealt with on an individual basis there will be a failure by the District Council to understand the cumulative impact such growth will have on the community of Thurston. It is also held that consideration of each individual planning application will not provide an appropriate response to the National Planning Policy Framework requirements nor to the impact on Thurston itself. It is for this very reason that the Neighbourhood Plan Team have concentrated their efforts at looking at the common issues facing each application as well as looking at the fundamental principle of development for each individual site and where provided, specifically the more detailed layout proposals and their impact given each location.

The Neighbourhood Plan Team would also like to state that in accordance with the Parish Council Protocol's for Pre Planning Application Developments – no comments on the suitability of the site for development or how the site performs in relation to others ahead of the site assessment work were made during the attendance of representatives from any of the Developers/Land Owners or their agents at Neighbourhood Plan Meetings and that whilst all applicants who attended such meetings had been informed that they could state that they had met with the Neighbourhood Plan Steering Group they could not in any forthcoming developer public meetings state that their proposals have in any way, shape or form, been endorsed by the Neighbourhood Planning Steering Group.

Whilst Thurston Parish Council is at a relatively advanced stage in preparing a Neighbourhood Plan and whilst the plan has not yet reached the final stage of allocating sites or proposing policies, following consultation with the public and land owners and agents on the site assessments carried out during Summer – Autumn 2016 it should be afforded some weight in responding to this application. The results of the site assessments as carried out under the Parish Housing Land Availability Assessment, has raised some issues which the Neighbourhood Plan Team feel are so major and fundamental that they must be taken into account by Mid Suffolk District Council in determining these applications.

A copy of all site assessment work can be seen within Thurston's Village website:
<http://thurston.suffolk.cloud/neighbourhood-plan/site-assessment-of-sites-for-development/>

The Neighbourhood Plan Team would like to state that it is disappointed at the speed at which this and other applications have been submitted for new housing in the village. There seems to be a general haste to ensure that each development is the first to submit with little regard for the cumulative impact that each development will have on the general infrastructure of Thurston which requires time to evolve and time to absorb new residents and associated growth. There is a general concern that the size of new developments being proposed will result in Thurston losing its 'village feel' and for it to become 'a small town'.

The Neighbourhood Plan Team is also disappointed that despite reassurances from Mid Suffolk that work on its Local Plan is proceeding, there is still no information being released as to the expected housing growth in the area and that work on the Councils Housing needs (Objectively Assessed Needs) is ongoing.

Given the scale of proposed housing development, the Neighbourhood Plan Team would request that the District Council adopts a cohesive approach that looks at the totality of applications and their impact on all of Thurston's infrastructure and social development. As way of emphasis the following table demonstrates the applications that are facing Thurston:

| Owner/Builder | Planning Reference | Status of application | Description of development | Number of dwellings |
|---|--------------------|--|--|---------------------|
| Playdri Products Ltd, Granary Site, Station Road | 2430/08 | Outline granted. Phase 2 delayed. | Remainder of site with blocks of flats. | 92 |
| Playdri Products Ltd, Granary Site, Station Road | 3181/13 | Preliminary work started on phase 1 in 2016. | Single building commercial centre with 9 flats above | 9 |
| Bovis Homes, Barton Road | 4386/16 | No decision Comments closed | Purely residential | 138 |
| Hopkins Homes, Sandpit Lane | 2797/16 & 5010/16 | No decision No decision | Purely residential | 175 |
| Pigeon Developments, Norton Road | 5070/16 | No decision | Residential with 2 form entry primary school | 200 |
| Persimmon, Ixworth Road | 4963/16 | No decision | Residential with primary school (no size given) | 250 |
| Laurence Homes, Norton Road | 4942/16 | No decision | Purely residential | 64 |
| Possible number of dwellings to be added to Thurston | | | | 928 |

Regarding the common issues for all six applications submitted (4942/16; 4963/16; 5010/16; 5070/16; 4386/16 & 2797/16), the Neighbourhood Plan Team has broken these down into 4 main areas: Education; Housing and Transport and Social Challenges

- **Education:**
Currently primary education facilities are landlocked and full. Any future housing requires functioning primary education facilities before housing occupancy. The footpath and road network also needs substantial improvement to accommodate additional education provision. It is felt that multiple housing planning applications in Thurston demand a cohesive approach that looks at the totality of applications as well as individual consideration considering the impact of all of them on education and other infrastructure issues. In addition, Secondary students 11-16 currently attend Thurston Community College. Post 16 students are located in Beyton. It is understood that at some point in the future students may relocate to the Thurston site. Further secondary provision is available in both Ixworth and Bury St Edmunds. Suffolk County Council Education Department has indicated that were sufficient housing to be built in Thurston, Woolpit and Elmswell further secondary provision would be required somewhere along the A14 corridor.

Any significant housing would require additional primary education places. Suffolk County Council (letter from Peter Freer to Lisa Evans, MSDC) referring to Planning Application 2797/16 outlines its position:

'NPPF paragraph 72 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.'

'We currently forecast to have no surplus places at the catchment Primary School to accommodate children arising [from new developments], but there is some capacity at the Community College. The Primary School site is landlocked and cannot be expanded and the Community College has the largest secondary catchment in the County and is unlikely that expansion would be supported in the future.

'The County Council has been in discussions with the District 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.

'The anticipated approach to mitigate the impacts of housing growth in the area is to provide a new primary school which would incorporate the existing primary school. This new primary school would be constructed as a 315-place school initially, capable of being expanded to 420 places to meet future development. The estimated construction cost of a 420 place primary school is £6.9 million on a 2.2 hectare site.'

In addition, given capacity and legislative issues

'... the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 26 place setting, providing sufficient capacity for 52 children in total.'

The Thurston Neighbourhood Plan Team recognises and endorses the County Council position. New housing development on any scale in Thurston requires provision of a functioning primary school with early education places before the occupation of housing. There is no spare capacity in existing provision.

Any chosen location for a Primary School will have an impact on roads and footpaths in the village. There are major transport issues associated with the Community College. Over 25 coaches bring and take students to and from the College daily. The road network is under pressure; the coaches and parents' cars delivering and collecting students near the College create a daily problem. When there are parents' evenings, cars are parked inappropriately on footpaths, verges and close to road junctions.

In the current location, the Primary School presents associated pedestrian and vehicle concerns. In a new location, a larger school will bring added demands. Appropriate footways, road crossings, vehicle access (immediate and wider) and car parking will need to be accommodated. There is nowhere in Thurston that has current adequate provision to assimilate the pedestrian and vehicle movements particularly at the beginning and the end of the day in school term time.

- **Housing**

Thurston has received 5 planning applications over recent weeks from 5 separate developers. The total number of dwellings proposed by these applications amounts to 827 homes – which would result in approximately a 64% increase in the current total housing stock of Thurston. These figures do not include the 2 existing applications at the Granary which add a further 101 dwellings to the tally. Should all applications submitted be approved, there is a concern that not only will the village infrastructure be insufficient to cope, but the whole nature and ambiance of Thurston will change from that of a large vibrant village to that of a faceless dormitory town. The determination of these applications should be viewed as a whole if the development within Thurston is to be sympathetic and sustainable. Considering each application individually has the potential to allow by default considerably more development than the village could cope with.

A break-down of housing types and numbers (where known) is provided below:

| Site | Land west of Ixworth Road 4963/16 | Land at Norton Road 5070/16 | Land at Meadow Lane 4942/16 | Land south of Norton Rd 2797/16 5010/16 | Land west of Barton Rd 4386/16 | Land west of Ixworth Road 4963/16 | Land at Norton Road 5070/16 | Land at Meadow Lane 4942/16 | Land south of Norton Rd 2797/16 5010/16 | Land west of Barton Rd 4386/16 | Land west of Ixworth Road 4963/16 | Land at Meadow Lane 4942/16 |
|---------------------------|-----------------------------------|-----------------------------|-----------------------------|---|--------------------------------|-----------------------------------|---------------------------------------|-----------------------------|---|--------------------------------|-----------------------------------|-----------------------------|
| Bedrooms | Market Housing | | | | | Affordable Housing | | | | | Intermediate/shared equity | |
| 1 | | 5 | | | | | | | | | 24 | appts |
| 2 | | 4 terraced 12 bungalows | 6 | | 4 bungalows | | 9 bungalows 5 appts | | | | 16 | houses |
| 3 | | 25 semis 26 detached | 13 | | 3 bungalows 22 houses | | 3 bungalows 6 appts 12 terraced | | | | 6 | houses |
| 4 | | 31 detached | 17 | | 46 houses | | 31 semis 5 detached | | | | 2 | houses |
| 5 | | 18 detached | 6 | | 13 houses 2 4/5 houses | | | | | | | |
| Self-build | | 9 | | | | | | | | | | |
| Sub Total | 163 | 130 | 42 | 114 | 90 | 65 | 70 | 16 | 61 | 48 | 22 | 6 |
| Total | 539 | | | | | 260 | | | | | 28 | |
| Final total 827 dwellings | | | | | | | | | | | | |

NB: Types and numbers of dwellings are shown where they have been made available in the Planning Application.

Generally, all the proposed sites are situated on land currently used for agricultural purposes on the outer boundaries of the village. The Neighbourhood Plan Team having considered the agricultural classification of land upon which these sites are situated had been made aware that, based on the generalised 1:250000 maps, the best and most versatile land generally occurs to the north of the village. Whilst it is recognised that individual site classifications are usually fully determined following detailed field work, the Neighbourhood Plan Team is concerned that development is being proposed on the best and most versatile land. Furthermore, all of the sites that have been submitted under planning applications that have come forward, are situated outside the Settlement Boundary and face out onto open countryside. The visual impact of each proposed development on approaching the village will be significant and will have an impact on the existing character and appearance of the countryside.

In general, the sites are of a higher density than those in their immediate vicinity. The plans reflect housing more appropriate to an urban landscape rather than a rural village. Several of the proposals include 2.5 to 3-storey dwellings with ridge heights of up to 12m. No other housing of this type can be found nearby. All the sites have at least one boundary abutting existing bungalows, dormer bungalows or small cottages. The designs are therefore not in keeping with the scale, type or density of housing in their locality.

Feedback from the Neighbourhood Plan Survey indicates that residents accept the need for expansion but in a sympathetic and controlled manner in order that infrastructure can keep pace with demand. Furthermore, they expressed, inter alia, a desire for relatively small developments of up to 50 dwellings with open spaces which reflect those found in other parts of the village. The survey indicates that during the next 15 years, 47% of respondents would be looking for bungalow accommodation, 44% homes suitable for retirees and 17% for assisted living and care homes. The proposed plans do not reflect the residents' future needs and are not, therefore, considered to be sustainable. Neither do the applications reflect the continuing need for housing across all tenures and a growing need for affordable housing. The

Ipswich Housing Market Area, Strategic Housing Market Assessment (SHMA) Document and 2014 Suffolk Housing Needs Survey all show that there is a high demand for smaller homes across all tenures from those who maybe starting households to those who may be looking to downsize. The Enabling Housing Officer at Mid Suffolk in her response to Planning Application 4386/16 makes reference to the fact that affordability issues are the key driver for the increase in smaller homes and that there is a strong demand for one and two bedroom flats/apartments and houses.

The large number of dwellings proposed would result in a substantial increase in the number of motorized vehicles within the residential areas. The Neighbourhood Plan Team does not consider the plans take sufficient heed of on-site parking requirements. This failure will inevitably lead to overspill onto and congestion within adjacent roads.

- Transport

Thurston is situated inside a triangle of A roads, the base of which is the A14, the eastern side is the A1088 and the western side is the A143. The apex of the triangle is just north of Pakenham where the A1088 crosses the A143. There are no B roads inside this triangle. All the interior roads are just for local access and by-roads, which are not maintained by the council to a standard suitable for heavy traffic. Current potholes in some places are described as "a death trap for cyclists". Access to the A14 towards Bury St Edmunds is either via Fishwick Corner where Barton (New) Road makes a junction with Mount Road or Pokeridge Corner at the junction of Beyton Road, Thedwastre Hill and Mount Road. These have already been found to be accident-prone congested junctions with current traffic flows. At the other end of Barton Road there is access to the A143 and this junction is also often congested and subject to accidents. All of the applications submitted fail to take into account the committed schemes within Bury St Edmunds, Ixworth and Stanton which will alter the traffic flows along these road networks.

The standard S2 single carriage way in each direction type of road, upon which the Transport Assessments base their computer models, is described as 7 m in width. The roads leading into and out of Thurston do not have consistent widths and can be as narrow as 4.3 m. Norton Road, Church Road and School Road have places, unencumbered by parked vehicles, where two cars cannot pass safely and vehicles have to draw right off the road if a bus or larger vehicle comes along. Furthermore the Grade II listed Railway Bridge on Barton Road warns high vehicles to drive in the middle of the narrow road to get through under the arch. While one footway varies in width from 1 m to only 0.7 m, the opposite one tapers to nothing at all. Currently there is only room for one way vehicle flow over the other railway bridge on Thedwastre Road and no safe footway for pedestrians, just a white line one metre from the wall. Thedwastre Road leads to the junction with Beyton Road where congestion in the morning is already well recorded.

The traffic in and around Thurston varies enormously depending on the time of day as the Community College, Beyton Sixth Form College and Ixworth Free School educate students from a wide area, with many students being carried in coaches twice a school day. Travelling through and to the Community College and the Village are Bus Routes TN112; TN114; TN118; TN120; TH140; TN144; TN161 and TN163. In the morning and afternoon 25+ coaches and numerous vehicles deliver and pickup students and have a negative impact on the flow of traffic along Norton Road, Barton Road and Station Hill. In the afternoon this congestion is more noticeable as the coaches arrive in 2 dedicated waves with early arrival by the second wave creating issues. Some routes have a note to coach drivers to approach the College via Station Road to avoid other blocks near the Post Office/village stores on Barton Road where there are usually cars parked, narrowing the road. Other buses, provide a service to Stowmarket to Bury St Edmunds via Beyton and a service from Stowmarket to Bury St Edmunds via Norton. Combined, these give an hourly service to people in Thurston in each direction throughout most of the day Monday to Saturday. The route in Thurston is via School Road, Church Road, Norton Road, Heath Road, Genesta Drive and Barton Road. This means that in addition to the school transport at peak times, buses are travelling through the village throughout the day. Furthermore on a Monday to Saturday there is a bus service to Diss which stops outside Thurston Community College at 0855 and arrives back in Thurston (opposite Community College) at 1605.

From Monday to Saturday, there are hourly train services in each direction throughout the day, generally at 29 minutes past the hour to Stowmarket and Ipswich (east), and 12 minutes to the hour to Bury St Edmunds and Cambridge (west), with variations in the evenings and early mornings. There are slightly fewer trains on Saturdays. On Sundays and Bank Holidays there is a two-hourly service, but there are alternative two-hourly services to Ipswich and Peterborough from Bury St Edmunds. The main drawback to train travel for future growth for those unable to walk to the station is that there are only 12 official parking places provided and these are filled very early in the day. Cyclists also have only 1 cycle rack to hold 4 cycles and a notice telling them that only the official rack may be used. Overflow parking up Station Hill already happens. The rest of the Granary site is the subject of development plans belonging to a private developer and there is no room for the provision of extra parking. Of significant concern to the Neighbourhood Plan Team is the necessity for passengers having to walk across two tracks which carry non-stop passenger and goods trains to access one of the platforms. Although there is a siren the risk

will be heightened the more footfall there is at the station. The Team is concerned that there are no plans to see improvements made to this station at a time when Network Rail are closing rural footpaths that cross rail tracks due to the dangers posed, and yet this dangerous crossing, which has to be used every day by many including schoolchildren, is deemed to be safe.

The Neighbourhood Plan Team is concerned that, having viewed the documents still available on Mid-Suffolk's District Planning site for the development at the Granary, no Transport Assessment can be found, although a commercial centre will involve delivery vehicles as well as visits from customers, besides the trips made by the cars and vans used by residents of the proposed 100 or so flats. The more recent planning applications from agents acting on behalf of Bovis Homes, Hopkins Homes, Persimmon Homes and Pigeon Capital Management 2 Ltd include lengthy Travel Assessments. All state that they have examined the traffic flow at various key junctions in Thurston at AM and PM peak times and supply all their data and name the computer programs they have used to calculate capacity and degrees of congestion. It is noted that the Laurence Homes application for 64 homes is apparently a borderline size which may not need an assessment.

It is also stated in the assessments that the key junctions were decided on in pre-application consultations with Suffolk County Council. These were often examined by more than one developer however the Neighbourhood Plan Team is concerned that none of them examined the flow over the narrow one-carriageway railway bridge on Thedwastre Road and that not all of the applicants included within their crash assessments included Fishwick Corner which has a higher proportion of incidences than other areas quoted.

| Developer | Road | Junction | AM 2016 | PM 2016 | Accidents 2010-2014 | AM Future | PM Future |
|---------------------|-------------|--|------------------|------------------|-----------------------|-------------|-------------|
| Pigeon Developments | Norton Road | Peak traffic | 160→ | 110← | | | |
| Bovis Homes | Barton Road | | A | A | | +29% | +29% |
| Pigeon Developments | | Norton Rd/ Church Rd/ Pakenham Rd | A | A | | A | A |
| Hopkins Homes | | | | | | | |
| Pigeon Developments | | Norton Rd/ Sandpit Lane/ Meadow Lane | A | A | | A | A |
| Hopkins Homes | | | A | A | | A | A |
| Pigeon Developments | | Barton Rd/ Station Hill/ Mini Roundabout | A B A B | A A A B | 1 Slight 1 Serious | A A B | A A C |
| Bovis Homes | | | | | | | |
| Hopkins Homes | | Beyton Rd/ Thedwastre Rd | D B | C A | | D D | C A |
| Pigeon Developments | | Barton Rd/ Norton Rd | A A B | A A A | | A A B | A A A |
| Bovis Homes | | | | | | | |
| Persimmon Homes | | Ixworth Rd/ Norton Rd | C | A | | C | B |
| Bovis Homes | | Barton Rd/ A143 | D | F | 5 Slight 1 Serious | F | F |
| Bovis Homes | | Barton Rd/ Beyton Rd | C | A | | D | C |
| Bovis Homes | | Barton Rd/ Pakenham Rd | B | A | | B | A |

| | | | | | | | |
|-------------|--|------------------------------|---|---|-----------------------|---|---|
| Bovis Homes | | Barton (New) Rd/ Mount Rd | D | B | 7 Slight 1 Serious | F | B |
|-------------|--|------------------------------|---|---|-----------------------|---|---|

Using the data provided in the various individual assessments which were undertaken on different dates, the two roads and most of the junctions were recorded in AM and PM as "A" which means Free Flow. "B" is Reasonably Unimpeded. "C" is Stable, "D" is Lightly Congested. "E" is Significantly Congested and "F" is Heavily Congested. The after-development estimates were taken to be in 2021 except Bovis Homes who used 2023. Where different arms of a junction had different levels of flow, the highest was recorded above. It is noted that these records show only a slight increase in congestion after the development has gone ahead. However none of these estimates of future traffic took the other proposed developments into consideration only "background growth" and again the Neighbourhood Plan Team is concerned at the cumulative impact all of the developments would have on the current infrastructure.

Currently, with none of these developments completed, the surveys showed congestion points for commuters leaving Thurston for the A14 and A143 at the edges of the village. Thedwastre Road has the one carriageway railway bridge and its junction with Beyton Road on the way to the A14 is shown already as lightly congested. This involves a long queue of vehicles every morning, Monday to Friday at the junction. The mini roundabout near the station is the most likely junction to become more congested when the Granary development, which has already been passed by the planners, is completed. Records indicate that there have already been accidents there. This route leads to the Grade II listed railway bridge where passage is narrow, the road surface is often flooded, the footways are too narrow to be safe and it is another route to the A14, via Mount Road with a junction that is already highly congested with a record of accidents. At the other end of Barton Road the junction with the A143 is already heavily congested and accident-prone.

The Neighbourhood Plan Team recognises that current guidelines on rural traffic in general and in particular TA23/81 which gives official advice on new road developments, emphasises that rural roads should not be planned to carry more than 75% of their capacity, whereas urban roads are acceptable at 85%. This recognises the difference in quality and ambience between rural and urban living. Urbanites may balance long queues of traffic at peak times against shorter routes to work and more amenities close at hand. Village dwellers know how to duck and weave round huge agricultural vehicles travelling along narrow and winding roads and they pull up and give way with a wave, but they don't expect to have urban conditions of continuous traffic flowing through the village, even if it is a smooth flow as judged by most of the assessments done for Thurston. Villagers expect clean air, the opportunity to cross roads on foot without a long wait and the chance to hear birds singing rather than the continuous drone of traffic.

The Neighbourhood Plan Team recognises that Paragraph 17 of the NPPF is given as the justification for planning applications to be accompanied by a Transport Plan as well as a Transport Assessment: "Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."

Following the recommendation by Suffolk County Council, Persimmon Homes, Bovis Homes, Pigeon Developments Ltd and Hopkins Homes have each prepared their Transport Plans. These plans emphasise the opportunities for using public transport, walking (up to 2 km) and cycling. Their aim is clearly to try and reduce the use of private cars, as the plans involve employing someone to monitor the use of private cars in and from the development over a period of five years or so. This would be an intrusion into the private lives of residents which they would have to pay for in the price of the development. The Cycle Trail 51 which is widely quoted is very misleading and should be noted that within the village there is only a short distance along Station Hill and across New Green where it is marked on the ground and separated from other traffic. Children would not be safe to follow it on their own as to access this separated route, they would need to travel along Norton Road and over the crossover close to the junction with Norton Road/Ixworth Road/Station Hill. It should also be noted that should cyclists wish to travel east up Station Hill from Barton Road there are no safe crossing points onto the cycle route and that to access this point, Station Hill would need to be crossed on a bend on a steep hill with poor visibility.

The Neighbourhood Plan Team is therefore concerned that although some of the new applications propose small improvements to footways, crossings, bus shelters and the 30 mile speed limit on Ixworth Road, none of them can substantially improve the key junctions or the railway bridges where conditions will inevitably get worse with any extra traffic. The road system in Thurston was crystallised over a hundred years ago, based on the movement of mainly agricultural vehicles in a rural environment. The borders and junctions of these roads and the railway bridges fitted the traffic flows of that time. In many cases the borders are now built up so that roads cannot be widened and certainly the railway bridges are immovable. Each of the proposed developments would inevitably add more traffic despite efforts to wean people away from driving their own vehicles.

- Social Challenges

The Neighbourhood Plan Team is aware that with all growth the village faces a number of challenges and that whilst there are policies in place to ensure all developments provides a safe community; protects the environment from adverse impacts; reduces the level of crime or overcomes the fear of crime and provides a safe and secure environment, often the social impact of such growth is overlooked.

As such the Team has drawn up a list of the social challenges that will take place in Thurston with an increase in its population, the findings of which are replicated in the table below:

| Pros of increase in population | Cons of increase in population |
|---|---|
| <p>A new purpose-built primary school, more suited to the 21st century, would contribute to the life of the village.</p> | <p>A larger school will support more housing, which Developers will capitalize on. It will trigger more planning applications with family homes. Suffolk County Council work on 25 primary pupils per 100 houses, so there will be many more children which will affect the social dynamics of the village. Pupils will need appropriate cycle ways and paths to get safely to school, as our current school children do. The possible sites for a new school do not lend themselves so easily to safe walking or cycling. This is unfortunate, as it is valuable time for social interaction of children and parents.</p> |
| <p>Clubs and organizations for all age ranges will have increased numbers and for some this will help their sustainability. This includes the library and churches.</p> | <p>Newcomers to the village will put an extra strain on current organizations. If there are more problems with waiting lists it will give rise to bad feelings. Leaders will need support to ensure that they have enough resources to meet extra demands.</p> <p>The popular children's organizations of Brownies, Scouts and the ATC provide valuable social activities for the youth of the village. For the new children to feel welcome in Thurston and be able to have friendships outside school, it is vital that they are able to access such groups. Finding extra leaders and, possibly venues, will not be easy.</p> <p>The Cavendish Hall and New Green may be over-stretched, including their provision for parking. There will be many more demands on these venues with an increased number of young families.</p> <p>Sports clubs may need extra outdoor facilities. Footballers in the village have already highlighted the need for another pitch so this would be even more of a priority.</p> <p>There would be a rise in cycling on the primary traffic routes, which will also have an increase in vehicular movements, around the village for all age groups. A new larger primary school will increase the number of children cycling to school, but also those cycling as a leisure activity.</p> |
| <p>More residents would support a greater variety of leisure activities than are currently available in the village. Teenagers, particularly, could benefit from this and will find more support for a Skateboard Park.</p> | <p>Difficulties are as described above with leaders and venues.</p> |

| | |
|--|---|
| <p>A greater variety of shops and facilities would be supported, giving residents more choice of various facilities within the village. This could be helpful to elderly people who do not want to travel into town.</p> | <p>More shops and other facilities will change the village atmosphere to one of a small town.</p> <p>This will impact on the social dynamics of Thurston, which views itself very much as a village. Residents may resent the extra shops and facilities rather than welcome them. This will, again, give rise to bad feelings towards the new developments.</p> |
| <p>More residents would help to support and sustain bus and train services, which add to the choice of social activities outside the village.</p> | <p>The pressure on these services is expected to increase with additional use being promoted through each applicant's Travel Plan with the implementation of measures designed to promote sustainable travel. Young families may however travel by car which will see an increase on the current road infrastructure. Unless improvements are made to the car parking facilities at the Railway Station along with additional cycle facilities there will be a detrimental on surrounding residential areas</p> |
| <p>More pressure for a Doctor's surgery or Medical Centre.</p> | <p>Medical provision will be impacted within the health catchment area. Currently the nearest practice does not have sufficient capacity for additional growth resulting from further development. As currently stands NHS England is only looking for a Developer Contribution to increase capacity within the GP catchment area. This increase is unsustainable if all applications were to be determined favorably.</p> |
| <p>Additional footpaths and cycle ways arising from the new developments would offer more variety of routes for walkers and cyclists. This would help all residents to achieve a healthy life style.</p> | <p>Thurston takes a pride in its footpaths and natural environment. This is the result of well-known residents promoting the paths and looking after its trees and wildlife. A larger population which suddenly arrived in the village would not be familiar with these values and this could also give rise to ill feeling towards newcomers. Such concerns include people not following the country code while walking in the countryside, leading to friction with the landowners. Others are that more dogs may cause problems by being off the lead, worrying live-stock, damaging crops and disturbing ground nesting birds. There is also the matter of dog-mess which is already a cause of irritation if not dealt with correctly.</p> <p>The Suffolk Wildlife reserve at Grove Farm is situated within the Parish of Thurston where walkers can see different habitats, flora and fauna. The reserve can be part of a pleasant destination for leisurely walks and cycle rides. With an increasing population and more visitors, it will be necessary to ensure it is not at risk</p> |

As stated previously whilst the Neighbourhood Plan has not yet reached the stage of allocating sites or proposing policies, it has followed a period of extensive consultation with the public and land owners and agents on the site assessments carried out during Summer - Autumn 2016 following the Neighbourhood Plan Team's Call for Sites of January 2016, under the Parish Housing Land Availability Assessment. Throughout this process of consultation, several issues have arisen which the Neighbourhood Plan Team feel are so major and fundamental as to override any acknowledgment of this site's "slightly positive" assessment.

Overall the Neighbourhood Plan Team would ask the Parish Council to consider its concerns for this application on this site for the following reasons:

- The site on Norton Road has only one vehicular entrance to potentially 64 dwellings with a footpath to Meadow Lane.

- road safety with emphasis on the junctions of Norton Road and Ixworth Road which is very close to the Community College at the AM and PM peak times.
- road safety issues with emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pokeridge Corner
- pedestrian safety along Norton Road for accessing village facilities as there are no safe crossing points
- impact of the vehicular movements from a single point of entry onto Norton Road. It is also on the same side and near to the entrance to Rylands Close with also generates traffic
- development inappropriate to that of land abutting the countryside
- impact on village infrastructure particularly education and health provision
- type and density of housing mix not in accordance with the Neighbourhood Plan findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people.
- cost of affordable homes for local residents – the application fails to take into account the District Wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

In summary, whilst the Neighbourhood Plan Team recognises the need for future development to take place within Thurston and is aware that the size of development coming forth under this application is more in keeping with the Community's preference to see growth limited to plots of no more than 50 dwellings, it does not support the application in its present guise for the concerns outlined above.

Moreover, given the scale of proposed housing development, the Neighbourhood Plan Team would ask that the Parish Council requests that the District Council adopts a cohesive approach that looks at the totality of the applications submitted and their impact on all of Thurston's infrastructure and social development.

Yours faithfully,

Victoria S Waples

Victoria S Waples, BA (Hons), CiLCA
Secretary to Thurston Neighbourhood Plan Team



Your ref: 4942/16
Our ref: 00044352
Date: 07 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Ian Ward
Planning Department
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

Dear Ian,

Re: Thurston, Land at Meadow Lane – 64 dwellings

There are now five live applications for planning permission on sites in Thurston. In view of these applications which add up to over 800 dwellings it is clear that the County Council needs to consider the cumulative impact implications on highways and education infrastructure in the locality.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

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



SENT AS AN E-MAIL

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

February 10th 2017

Dear Mr. Isbell,

Proposal: Planning Application 4942-16 – application for residential development consisting of 64 dwellings and associated highway, car parking and public open space @ land at Meadow Lane

Case Officer: Ian Ward

The Parish Council wishes to place on record that it objects to this proposal in its current guise and that the proposal is considered not to form a sustainable development within the dimensions set out in the NPPF, risks harm to biodiversity and fails to address adequately the economic and social benefits. Furthermore, the Parish Council feels that given the size of the development being proposed, the likely CIL yield for the provision of additional educational facilities and medical facilities will not be able to offset the cumulative effects of this proposal and as such will overburden existing infrastructure.

The following reasons should be considered and form the basis for the objection:

The site and surrounding area are within the countryside and therefore outside 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. Whilst it is acknowledged that part of the development abuts the settlement boundary of Thurston, it is felt that development of the site to the North of Norton Road would neither protect nor enhance the character of the village which is currently rural and would therefore not only be contrary to GP1 – Design and Layout of Development but also be contrary to csfr-fc2 provision and distribution of housing and cor2 development in the countryside and countryside villages. The Parish Council further feels that the application submitted 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 and that the application, if approved, will fail to consider the loss of public viewpoints from this site, will fail to protect the quiet recreational enjoyment enjoyed by those accessing Meadow Lane and will fail to protect the wildlife habitats at this point in the village and will therefore be contrary to policies H16 – protecting existing residential amenity CL8 – protecting Wildlife Habitats.

The Parish Council feels that the application fails to consider policy cor9 (cs9 density and mix) and fails to demonstrate that it has achieved a mix of house types, sizes and affordability to cater for accommodation needs. Whilst it is acknowledged that Policy CS9 recognises that housing sites may range from town to village, all applications for housing should be expected to respect the traditional form of development rather than follow a standardised suburban form of development. The Parish Council is concerned that the application submitted fails to show that it has considered the current mix of housing within the village of Thurston and that it fails to have taken account of the findings of tenure type and mix within the Neighbourhood Plan consultations, nor the findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people. The Parish Council is also concerned that the application fails to take significant regard for the District wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

The Parish Council also supports the comments made by Suffolk Constabulary Design Out Officer with regards to landscaping and hedging and has concerns that the proposed boundary hedging, unless kept under control, may well form barriers where passive natural surveillance may not be possible and/or may be permeable for an offender to gain access to properties. There is also concern that such hedging may well impede on the highway along Norton Road and Meadow Lane. Furthermore, the Parish Council is concerned that the application fails to take into account the Department of Transport's Manual for Streets which expects planning applications to follow the general principles for reducing the likelihood of crime in residential areas and that "the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space' and that 'access to the rear of dwellings from public spaces, including alleys, should be avoided and layouts should be designed with regard to existing levels of crime in an area'

The Parish Council considers that the application 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 Primary School and Secondary School 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).

The Parish Council also finds that the development fails to demonstrate that it has considered safe and suitable access points for all people and as such is contrary to paragraph 32 of the NPPF. As the development fails to give priority to pedestrian and cycle movements and given the location of the site, it would not support the transition to a low carbon future and is therefore 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.

Furthermore, the Parish Council is concerned at the impact of the location of an entrance very close to that of Rylands Close and the junction of Sandpit Lane. The increased traffic that this development will produce if the tenure and mix of housing is approved as submitted, will have a detrimental impact on Norton Road and it is felt that insufficient detail has been given to ensure that, with reference to NPPF paragraph 32 'safe and suitable access can be achieved for all people.' It is also acknowledged that Suffolk County Council in its response to Planning Application 2797/16 recommended refusal for an exit onto Norton Road as the proposal 'could not be considered to be safe for all'.

The Parish Council also feels that that assessment holds true for this application and would ask that Highways be asked to comment further on the siting of an additional entrance onto Norton Road serving plots 1 – 4 – in addition to the one serving the main area. The Parish Council is concerned that this entrance does not follow the Suffolk Design Code for Residential Areas which states that from the point of safety and the need to consider access in emergencies, not more than 150 dwellings will normally be served by a single means of access. The Parish Council is further concerned that, by inserting 2 entrances onto Norton Road within close proximity of one another, the application fails to consider the layout of Norton Road and its proximity to the junctions of Norton Road/Sandpit Lane and Norton Road/Ixworth Road, does not take into account the expected volumes and speeds of vehicular traffic along Norton Road and fails to show that it has considered the dangers associated with vehicular and pedestrian movements at such junctions.

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 the village which will also be contrary to the sustainability objectives of Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012) and the NPPF paragraphs 14, 17, 55 and 56 and will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway bridge crossings on Barton Road, the Priority System on Thedwastre Road and entry and exit points onto the A14.

The Parish Council is aware 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. It is recognised and understood that, 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.

The Parish Council 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 Meeting held to discuss this application amongst others as well as those 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. The Parish Council has received correspondence from the Neighbourhood Plan

Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that they are to be included within its submission.

It is known that that letter was submitted to the Planning Department at Mid Suffolk on 3rd February and its contents should be taken as being fully endorsed by the Parish Council.

The Parish Council would further wish to reiterate the concerns of the Thurston Neighbourhood Plan Team with regards to the speed at which this and other applications have been submitted for new housing in the village. It is recognised within the village that as a Key Service Centre the village of Thurston will appeal to developers and that a certain amount of growth is desirable and non-objectionable, however the Parish Council is concerned that piecemeal development will have a negative impact on the current infrastructure and that there should be a strict control over new housing proposals and the associated numbers until the general infrastructure of Thurston and the surrounding areas has been given time to absorb new residents and the impacts that this associated growth will have on a rural village.

As such, the Parish Council formally requests that there is a change to the process and approach undertaken by the District Council in dealing with this and the other significant planning applications before it and that they are considered in a holistic manner with the impact from all development being considered once a thorough and engaging review has been undertaken with all the service providers to include NHS England; Education, Highways and Transportation Providers.

As confirmation, the Parish Council is unable to support, in its current form, the application that has been submitted for this site.

Yours sincerely,

Victoria S Waples

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





Consultation Response Pro forma

| | | | |
|----------|---|--|-----------------------------|
| 1 | Application Number | 4942/16 Meadow Lane, Thurston | |
| 2 | Date of Response | 17.2.17 | |
| 3 | Responding Officer | Name: | Paul Harrison |
| | | Job Title: | Heritage and Design Officer |
| | | Responding on behalf of... | Heritage |
| 4 | Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • no harm to a designated heritage asset because it would not result in material harm to the setting of heritage assets. No objection. | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | Except on its east side, the site is surrounded by modern development of residential and commercial character. To the east lies open agricultural land, and to the east of that is land associated with the grade II* listed Manor farmhouse and grade II listed barn, formerly Manor Farm. These listed buildings stand surrounded by farmland. The isolated rural location and close historic association with the farmland make a considerable and essential contribution to understanding and appreciating their significance. Given the context of existing development around the application site, it is considered that built development on this site would not materially encroach on the settings of the listed buildings and would not be considered harmful. | |
| 6 | Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate | | |
| 7 | Recommended conditions | | |

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

Your ref: 4942/16
Our ref: Thurston – land at Meadow
Lane 00044352
Date: 18 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Mr Ian Ward,
Planning Department,
Mid Suffolk District Council,
Council Offices,
131 High Street,
Needham Market,
Ipswich,
IP6 8DL

Dear Ian,

Thurston: land at Meadow Lane – developer contributions

I refer to the planning application for residential development consisting of 64 dwellings and associated highway, car parking and public open space.

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £13,824 towards libraries provision.

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. The County Council's view is that appropriate mitigation from each of the 'live' planning applications should 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 in which planning obligations are sought by Suffolk County Council 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 123 Infrastructure 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 64 dwellings from this proposed development, amount to a total of 827 dwellings.

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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 seen as 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 21 January 2016 and started charging CIL on planning permissions granted from 11 April 2016. Mid Suffolk are required by Regulation 123 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 adopted 123 list.

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

- 1. Education.** NPPF paragraph 72 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 | Capacity | | | Actual/Forecast Pupil Numbers | | | | | |
|--|-----------|-------|-----------|-------------------------------|---------|---------|---------|---------|---------|
| | Permanent | 95% | Temporary | Total | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 |
| Thurston CE Academy | 210 | 200 | | 200 | 196 | 211 | 212 | 208 | 203 |
| | | 0 | | 0 | | | | | |
| Ixworth Free School (11 - 16) | 597 | 567 | 0 | 567 | 271 | 300 | 342 | 360 | 344 |
| Thurston Community College (11 - 16) | 1500 | 1426 | 0 | 1,426 | 1,581 | 1,599 | 1,585 | 1,647 | 1,547 |
| 11-16 total places | 2097 | 1992 | | 1992 | 1,832 | 1,899 | 1,927 | 1,897 | 1,891 |
| Thurston Community College (with Sixth Form) | 1940 | 1,843 | 0 | 1,843 | 1,828 | 1,849 | 1,862 | 1,872 | 1,888 |

| School level | Minimum pupil yield | Required |
|---------------------------------|---------------------|----------|
| Primary school age range, 5-11: | 15 | 15 |
| High school age range, 11-16: | 11 | 0 |

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 a number of 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 seen as a far from ideal strategy and should only be considered for a very temporary period because there are a number of 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.

Regarding out of catchment schools, major studies have shown that each transfer can result in a 6 month dip in standards as a minimum. 40% will eventually recover but 12% of pupils suffer long term negative effects. 2-tier pupils always out-performed 3-tier pupils at GCSE in the past and whilst the additional transfer isn't the only reason it does have a negative effect.

The Policy Development Panel for School Organisation Review recommended at the start that any proposal should:

- 1) Ensure a single line of accountability for each key stage and
- 2) Minimise the number of points of transfer from one school to another within the statutory age range

This was the reason why the final decision was made to close the middle schools.

In addition to the above a lot of work is involved in transferring a pupil cohort from one school to another. There's the preparation and handover of pupil records to ensure the new school is made aware of each child's history, progress, health, needs and other agencies' involvement etc... to ensure continuity of their learning. There's also the pastoral care of all children so they feel comfortable with the change. Vulnerable and looked after children and those with SEN and behaviour difficulties and their parents have to be supported particularly sensitively and this could involve anything from regular visits to the school to staff working across the two schools for a period of time.

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Due to the current uncertainty over the scale, location and distribution of housing growth in the Thurston locality it is not clear at this point in time 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 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
- £6.9m/420places = £16,429 per pupil place
- From 64 dwellings it is forecast that 15 primary age pupils will arise
- Therefore 15 pupils x £16,429 per place = **£246,435 (2016/17 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 15 places x £1,294 per place = **£19,410.**

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

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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 is allowed to 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 or not to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would have limited powers to impose this on them. Iain Maxwell (Assistant Senior Infrastructure Officer in SCC's, Children and Young People Service) met with the Head teacher and 3 Governors on Thursday 26th January 2017 to explain the situation. Although there were reservations from the school the overall

response was to accept in principle the installation of the temporary classroom if it was needed, providing there was evidence that the new school would be built and open in the early stages of the housing developments to minimise the length of time the temporary building would remain on site. Formal acceptance in writing from the school has now been received.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction commencing on the new school early on. The costs between renting and buying are comparative. Should developers prefer to rent and pay for installation and removal costs this is acceptable to SCC, and an ongoing rental charge/obligation can be included in the Section 106 agreement. At this stage SCC doesn't know how many additional houses the District Council or Parish Council anticipates for the village or when they will be occupied, but we do know the school cannot cope without this double mobile. Even then this will only accommodate 60 pupils, i.e. approximately 240 dwellings and there are more than this number in the current undetermined applications for planning permission. The District Council will need to consider whether a planning condition to restrict occupation until permanent primary education provision is available locally that is an acceptable solution to support further development once the temporary provision places are used up by additional development.

The proportionate temporary accommodation contribution is calculated as follows:

- Cost of a temporary accommodation £250,000
- Cost per place = £250,000/60 = £4,167
- Primary age pupils arising from this site is 15
- Proportionate contribution towards temporary classroom is 15 pupils x £4,167 per place = £62,505

The temporary classroom cost of £250k will be apportioned across all developments that secure planning permission, based on dwelling occupations/pupils arising from each scheme up to the maximum of £250k/60 pupils. The planning obligation will need to be worded in such a way for each scheme that the maximum they will pay will be based on total pupils arising and/or limited to the 60 places. In theory the 5 schemes could proportionately split the £250k cost but have a dwelling occupancy restriction once the 60 places have been used up; or any combination of circumstances which may arise.

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

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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 is in the process of being analysed, but the initial view is that in due course 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.** Education for early years should be considered as part of addressing the requirements of 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. The Childcare Act in Section 7 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 Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

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 64 dwellings, the County Council anticipates around 6 pre-school pupils eligible for funded early education. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 6 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 64 dwellings there is the need for 6 additional places
- Therefore 6 pupils x £8,333 per place = **£49,998 (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:

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- 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.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and 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 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Steve Merry/Christopher Fish of Suffolk County Highway Network Management.

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

5. **Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, 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 Mid Suffolk housing team to identify local housing needs.
6. **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

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dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that in considering:

"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 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.

- 7. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provide support and advice on their installation.

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

- 8. Superfast broadband.** 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 impacting 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.

- 9. 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.
- 10. Time limit.** The above information is time-limited for 6 months only from the date of this letter.

I consider that the contributions requested are justified and satisfy the requirements
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of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Strategic Development -- Resource Management

cc Neil McManus, SCC
Iain Maxwell, SCC
Peter Robinson, Chairman - Thurston Parish Council
Christine Thurlow, MSDC
Steve Merry, SCC



Ian Ward
Planning Department
Mid Suffolk District Council
131 High Street
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Brooke House
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01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

21/02/2017

Dear Ian,

RE: 4942/16 Residential development consisting of 64 dwellings and associated highway, car parking and public open space. Land at Meadow Lane, Thurston, IP31 3QG

Thank you for sending us details of this application, we have the following comments:

We have read the ecological survey report (Hillier Ecology Limited, October 2016) and we note the findings of the consultant.

The site is bounded by hedgerows, whilst we note that they are not considered by the ecological consultant to meet the 'Important' Hedgerows Criteria (Hedgerow Regulations (1997)), they are a UK and Suffolk Priority habitat and offer nesting habitat for bird species and foraging and commuting habitat for bat species. From the Design and Access Statement it is unclear whether it is intended for the hedgerow bounding Meadow Lane is to be incorporated into the gardens of the proposed properties? This could result in unsympathetic management of these features and the reduction in their ecological value. We therefore request that either they are kept outside of the domestic curtilages or that a mechanism is found to enable their ecological value to be maintained.

We also note that the hedgerow bordering Norton Road is to be removed. It is unclear whether compensation planting is proposed. In the absence of compensation measures this would be a loss of a UK and Suffolk Priority habitat, contrary to the requirements of the National Planning Policy Framework (NPPF) and Mid Suffolk DC's adopted Core Strategy document. We would therefore recommend that any development retains this hedgerow as it is relatively species-rich and provides potential foraging/commuting habitat for bats. We also recommend the planting of native species of local provenance to infill gaps in the hedgerows.

Although no skylarks were recorded on the site at the time of the ecological survey, this was carried out late in the season for this species. Although this is a relatively small site, there is some potential for skylark nesting and it is likely to provide part of the wider resource for skylark alongside neighbouring arable land. Skylark are a UK and Suffolk Priority species and are on the 'Red' list of Birds of Conservation Concern (BoCC) due to population declines. Compensation for the loss of suitable nesting habitat for this species must therefore be sought as part of this proposal, in combination with other potential losses from proposed developments on neighbouring sites. We would recommend that this is in the form of skylark plots (meeting the specification set out in Countryside Stewardship option AB4) on nearby arable land, these should be secured for a minimum of 10 years.

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We note the consultant has recommended a sympathetic lighting scheme during construction. It is important that all retained and new habitat features are not impacted on by light spill from external lighting and that dark corridors are retained around the site for foraging and commuting bats. We recommend that Suffolk County Council's street lighting strategy is used as a basis for long term street lighting layout and design, alongside the recommendations made in the ecological survey report.

There are records of Hedgehog, a UK and Suffolk Priority Species, in the surrounding area. To maintain connectivity for this species, we recommend maintaining hedgehog permeable boundaries (with gaps of 13x13cm at ground level) as part of this development.

Development at this site provides a good opportunity to include significant ecological enhancements, appropriate to the area. This should include the addition of bat boxes and integrated bird boxes, including swift boxes and sparrow terraces to the buildings, and ensuring that all greenspaces are managed to maximise their biodiversity value in the long term.

We request that the recommendations made within the report are implemented in full, via a condition of planning consent, should permission be granted.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jill Crighton
Conservation Planner



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00019797
Local Planning Authority: Mid Suffolk District
Site: Land at Meadow Lane, Thurston
Proposal: Residential development consisting of 64 dwellings and associated highway, car parking and public open place
Planning Application: 4942/16

Prepared by: Sandra Olim

Date: 27 February 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 Development may lead to an unacceptable risk of flooding downstream. A drainage strategy will need to be prepared in consultation with Anglian Water to propose a foul pumped rate determine mitigation measures if required.

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

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.

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.

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.

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Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk
@PlaceServices



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

28/02/2017

For the attention of: Ian Ward

Ref: 4942/16; Land at Meadow Lane, Thurston IP31 3QG

Thank you for consulting us on the submitted planning application for a residential development consisting of 64no. dwellings and associated highway, car parking and public open space

This letter sets out our consultation response focusing 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 proposal will inevitably have an impact, but this impact is limited to the eastern countryside edge and southern boundary of the site where the proposal fronts onto the surrounding site boundary along Norton Road and Meadow Lane.

The character of the site will change significantly as part of this proposal; the proposed landscape mitigations should seek to both provide suitable screening and appropriate landscaping to suitably reduce the impact of the development.

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

- 1) The eastern site boundary should be designed to reinforce and respond to the existing tree and hedge planting. When produced, the detailed landscape proposals should include additional planting to help reinforce the retained hedgerows within the site, using the appropriate indigenous species,
- 2) A Landscape Impact Appraisal or Assessment should be produced to demonstrate how the visual impact of the development can be mitigated through a suitable structured landscape plan,
- 3) Details of the proposed landscaping between the existing residential areas (to the north-east corner of the site) and the proposed development should be provided to reinforce the boundary edge of the site, while reducing the local visual impact of the proposals,
- 4) The Meadow Lane frontage of the layout should be rearranged to overlook/front onto Meadow Lane and the adjacent countryside, to create opportunities for passive surveillance and a more appropriate development edge to the rural facing edge of the site,



- 5) 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, (ideally 5 years) to support plant establishment,
- 6) A detailed boundary treatment plan and specification will need to be submitted as part of a planning condition, if the application is approved.

Review on the submitted information

The submitted planning application includes a strategic landscape plan, layout plan and design and access statement. The submitted strategic landscape plan highlights the broader landscape objectives but fails to include any tangible proposals which seek to mitigate the wider impact the development will have on the site and surrounding landscape.

The application does not include any Landscape Visual Impact Assessment or explore the visual impact the development will have on short, medium and long range views towards the site. The analysis within the design and access statement only includes short range views within and around the site.

Proposed mitigation

The setback frontage along Norton Road is a result of the 3m sewer easement rather than a considered design feature to create a landscape buffer along Norton Road. The combination of the 3m easement and the junction visibility splay combine to create what will be a harsh, landscape deficient street frontage, as demonstrated by the image on the front of the Design and Access Statement. Space needs to be provided for additional boundary planting to help screen the flank elevations and garden boundary fences.

The Meadow Lane frontage should be rearranged to overlook/front onto Meadow Lane and the adjacent countryside, to create opportunities for passive surveillance and a more appropriate development edge to the rural facing edge of the site.

Screening landscaping should be added to the boundary with the existing dwelling to the north-eastern corner of the site, to help reduce the impact of the development. All boundary and perimeter landscape should include locally indigenous plant species.

The proposed strategic landscaping plan needs to provide a comprehensive landscape vision for the site, which is evidenced by a landscape impact appraisal or landscape visual impact assessment, highlighting how the proposals can respond to the surrounding landscape.

Views into the site from the east are significant, even where existing hedgerows line the site and adjacent field boundary. There are opportunities to mitigate this by strengthening and reinforcing the eastern site boundary with new tree and hedge planting especially where there are gaps. This should be demonstrated through the detail landscape planting plan.

Yours sincerely,

Peter Dawson BA(hons) DipLA
Principal Consultant Landscape Architect
Telephone: 03330136861
Email: peter.dawson@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.



Your ref: 4942/16
Our ref: Thurston – land at Meadow Lane
000044352
Date: 05 March 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Dylan,

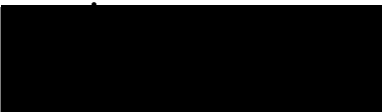
Thurston: land at Meadow Lane

I refer to the planning application for residential development consisting of 64 dwellings and associated highway, car parking and public open space.

The County Council responded by way of letter dated 18 February 2017 which is still relevant. However this letter provides an update on two issues, namely:

1. Temporary classroom. Whilst these mitigation requirements may still arise in this respect, the District Council's published 123 List contains 'provision of primary school places at existing schools'. So whilst the cost of the temporary classroom will therefore fall to CIL the District will need to report this to committee as a direct cost consequence arising if planning permission is granted and the scheme is built out. On this basis SCC will make a future CIL funding bid to Mid Suffolk District Council.
2. Suggested planning condition restricting dwelling occupations linked with surplus places available at the catchment village primary school. This is a matter for the District to take a view on when considering the application of the 6 tests set out in the National Planning Policy Framework.

Yours sincerely,



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

From: David Pizzey
Sent: 14 March 2017 09:54
To: Dylan Jones
Subject: Meadow Lane, Thurston.

From: David Pizzey
Sent: 18 January 2017 10:12
To: Ian Ward
Cc: 'planningadmin@midsuffolk.gov.uk'
Subject: 4942/16 Land at Meadow Lane, Thurston.

Ian

I have no objection in principle to this application as there seems few, if any, significant trees affected by the proposal. However, an arboricultural report will be required in order to identify impact of the design and protection measures necessary. The existing boundary hedgerows will be important to help soften and incorporate any development with the local landscape.

Regards

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzey@baberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils - Working Together

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



21 February 2017

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

By email only

Dear Dylan

Application: 4942/16

Location: Land at Meadow Lane, Thurston IP31 3QG

Proposal: Residential development consisting of 64 dwellings and associated highway, car parking and public open space

Thank you for consulting Place Services on the above application.

Holding objection: There is insufficient ecological information available to understand the likely impacts of development on Priority Habitats eg hedgerows and Priority species.

Although the Ecological Scoping Survey report (Hillier Ecology Oct 2016) provides sufficient ecological information to understand the impacts of development on Protected species, it fails to assess Priority habitats eg hedgerows and Priority species eg hedgehogs, farmland birds.

There is therefore a gap in information which needs to be filled before determination of this application. This additional information is necessary to confirm the likely impacts on hedgerows and priority species, together with any necessary mitigation measures having been secured.

I look forward to working with the LPA and the applicant to provide the missing information to remove my holding objection. 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
07809 314447

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.

BABERGH/MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Chief Planning Control Officer For the attention of: Planning admin
FROM: Nathan Pittam, Environmental Protection Team DATE: 16/3/17
YOUR REF: 4942/16. EH - Land Contamination.
SUBJECT: Residential development consisting of 64 dwellings and associated highway, car parking and public open space
Address: Land at, Meadow Lane, Thurston, BURY ST EDMUNDS, Suffolk.

Please find below my comments regarding contaminated land matters only.

The Environmental Protection Team has no objection to the proposed development, but would recommend that the following Planning Condition be attached to any planning permission:

Proposed Condition: Standard Contaminated Land Condition (CL01)

No development shall take place until:

- 1. A strategy for investigating any contamination present on site (including ground gases, where appropriate) has been submitted for approval by the Local Planning Authority.*
- 2. Following approval of the strategy, an investigation shall be carried out in accordance with the strategy.*
- 3. A written report shall be submitted detailing the findings of the investigation referred to in (2) above, and an assessment of the risk posed to receptors by the contamination (including ground gases, where appropriate) for approval by the Local Planning Authority. Subject to the risk assessment, the report shall include a Remediation Scheme as required.*
- 4. Any remediation work shall be carried out in accordance with the approved Remediation Scheme.*
- 5. Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.*

Reason: To identify the extent and mitigate risk to the public, the wider environment and buildings arising from land contamination.

It is important that the following advisory comments are included in any notes accompanying the Decision Notice:

"There is a suspicion that the site may be contaminated or affected by ground gases. You should be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.

ES/CL/DC - 010/V2

Unless agreed with the Local Planning Authority, you must not carry out any development work (including demolition or site preparation) until the requirements of the condition have been met, or without the prior approval of the Local Planning Authority.

The developer shall ensure that any reports relating to site investigations and subsequent remediation strategies shall be forwarded for comment to the following bodies:

- *Local Planning Authority*
- *Environmental Services*
- *Building Inspector*
- *Environment Agency*

Any site investigations and remediation strategies in respect of site contamination (including ground gases, where appropriate) shall be carried out in accordance with current approved standards and codes of practice.

The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's Environmental Protection Team."

Nathan Pittam
Senior Environmental Management Officer

From: Thurston Parish Council [<mailto:info@thurstonparishcouncil.gov.uk>]
Sent: 17 March 2017 10:10
To: Planning Admin; Philip Isbell; Trevor Saunders
Subject: FW: Saved search results and Tracked Applications have been updated

For the attention of: Dylan Jones

Dear Dylan,

As the case officer tasked with dealing with the Planning Applications listed below may I please confirm that the responses from both Thurston Parish Council and Thurston Neighbourhood Plan Team should be read as one overall response and should form part of the Parish Council's Statutory Consultee response.

Ref: 4386/16 Erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space - Land on the west side of Barton Road, Thurston IP31 3NT

Ref: 4963/16 Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road. - Land west of Ixworth Road, Thurston IP31 3PB

Ref: 5070/16 Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access) - Land at Norton Road, Thurston

Ref 4942/16 Residential development consisting of 64 dwellings and associated highway, car parking and public open space - Land at Meadow Lane, Thurston IP31 3QG

Ref 5010/16 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16 - Land to the south of Norton Road, Thurston IP31 3QH

Should you have any queries on this matter perhaps you would be kind enough to contact me.

Kind regards

Vicky

Mrs V Waples
Clerk & Proper Officer to Thurston Parish Council
Parish Council Office
New Green Centre
New Green Avenue
Thurston
IP31 3TG

Tel: 01359 232854
Website: Thurston.suffolk.cloud



From: Landscape [<mailto:Landscape@essex.gov.uk>]
Sent: 17 March 2017 13:02
To: Andrew Hastings
Cc: Dylan Jones
Subject: Meadow Lane.Thurston

Andy hi,

Thank you for your time today to meet onsite to discuss the landscape elements of this application. In so far as a summary of our discussion and the agreed actions, the following points should be addressed within the revised landscape submission:

1. Provide some analysis and mitigation proposals of the medium to long views looking towards the eastern boundary of the site. The viewpoints should include Norton Road and any PROW along this boundary edge of the site. (A plan with viewpoints/directions and photograph key would be sufficient.) You need to demonstrate a correlation between impact and mitigation- which may include some additional tree planting to soften the development edge.
2. Areas along the eastern boundary which include gaps, brambles and the access gate should be shown to include new replacement hedges, including the appropriate specification/species.
3. I welcome the suggested changes to the built frontage line along the southern boundary- to create space for appropriate hedge planting, beyond the easement. Attention needs to be given to the quality of the boundary treatment in this location. Due to the prominence of this boundary, walls would be my preference to panel fencing.
4. The landscape plan to include buffer planting between the existing properties in the north eastern corner of the site.
5. Happy to review the detailed landscape layout as a planning condition.

Kind regards,

Peter Dawson
Principal Urban Design and Landscape Consultant at Place Services

telephone: 03330136861 | mobile: 07748623787
web: www.placeservices.co.uk
linkedin: www.linkedin.com/in/peter-dawson



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Our Ref: 570/CON/4942/16
Date: 3rd April 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

NAME Mr Ian Baker
ADDRESS Laurence Homes
14 Ruskin Close
Stowmarket
Suffolk
IP14 1TY

Dear Mr Baker

Interim Reply to Planning Application 4942/16 for Residential development consisting of 64 dwellings and associated highway, car parking and public open space

This letter is complimentary to that ref 570/CON/4942/16 dated 10th March 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. This letter details the additional issues that the Highways Authority has identified specific to this application.

Site Access

Visibility splays of 4.5m x 60m are proposed and the access is within of the 30mph speed limit. This would be acceptable.

No swept path analysis has been provided for the entrance or within site. This will be required to show that the junction design is acceptable.

Highway Drainage

The applicant's attention is drawn to the issue of potential adoption and future maintenance of the highway drainage system. SCC are reluctant to adopt permeable paving, lagoons and most Suds systems. Early discussion with SCC Development Management officers is recommended.

Footway and cycle connectivity (inc Public Rights of Way)

The footway link to Meadow Lane should allow use by cycles in addition to pedestrians.

Internal Highway Layout

The 5.5m width carriageway and 2m wide verges would be acceptable for the principal access road. Details of the shared surfaces has not been supplied.

Car Parking

In the Design and Access Statement it is proposed that on-site parking and sizes of garages will comply with the current SCC guidance.

Landscaping

On the plans supplied it is noted that trees are shown in indicative positions. These are close to and overhanging the highway. Planting of vegetation that will or may in the future overhang the road should be restricted. Before the Highway Authority would consider a layout for an adopted road the applicant will need to agree details of such planting including how these would facilitate adequate street lighting and the risk of root damage mitigated.

Proposed S278 works

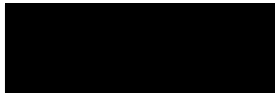
- Pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road (uncontrolled)
- Improvements to surface of Meadow Lane to promote cycle / pedestrian facilities (and maintain access to properties)

Proposed S106 Heads of Terms

- Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton
- Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road
- Contribution towards 40mph speed limit on the C692 Thurston Road as part of the above safety improvements
- Contribution towards provision of pedestrian crossing facilities at the junction of Norton Road / Station Hill / Ixworth Road.

The S278 and 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.

Yours sincerely



Steve Merry
Transport Policy and Development Manger
Resource Management

Sent: 25 April 2017 16:26

To: Dylan Jones

Subject: RE: Planning applications for 872 houses in Thurston

Dear Dylan, thank you for your enquiry. Of the 6 applications we only responded to 5070/16, the remaining applications had no environmental constraints in our remit.

Flood risk

None of the sites are in areas at risk of fluvial flooding. The assessment of risk of flooding from surface water is a matter for the lead local flood authority; Suffolk County Council.

Foul water disposal

According to our records there should be sufficient headroom within the Thurston Water Recycling Centre permitted Dry Water Flow to accommodate all 827 dwellings. It is important, however, that you consult Anglian Water as they are the only ones that can confirm whether the local foul sewers have sufficient hydraulic capacity.

The developers of each individual site should already have approached AWS with a Pre-development Enquiry. However, depending on the timing of those enquiries they may not have considered the cumulative impacts.

Water supply

Thurston lies in an area of water stress. Our standard water resources comments for this situation are below:

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

The development lies within the area traditionally supplied by Anglian Water Services Ltd. It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. You should seek advice from the water company to find out if this is the case, or a new source needs to be developed or a new abstraction licence is sought. We may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.

THE LOCATION OF DEVELOPMENT SHOULD TAKE INTO CONSIDERATION THE RELATIVE AVAILABILITY OF EXISTING DEVELOPED WATER RESOURCES

The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.

EVERY OPPORTUNITY SHOULD BE TAKEN TO BUILD WATER EFFICIENCY INTO NEW DEVELOPMENTS, AND INNOVATIVE APPROACHES SHOULD BE ENCOURAGED.

We support all initiatives aimed at reducing water use. The extent of water efficiency measures adopted will affect the demand for water for the development and we would expect that this will be taken into consideration. It is assumed that new houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. We support greywater recycling as it has the potential to reduce water consumption in the average household by up to 35% if achieved in a safe and hygienic manner.

It is the responsibility of the applicant to ensure that no local water features (including streams, ponds, lakes, ditches or drains) are detrimentally affected, this includes both licensed and unlicensed abstractions. If the proposal requires an abstraction licence, it is recommended that the applicant contact our permitting centre. Depending on water resources availability a licence may not be able to be granted.

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

External 02 03 02 58389

Mobile 07845 875238

graham.steel@environment-agency.gov.uk

<https://www.gov.uk/government/organisations/environment-agency>

<https://www.gov.uk/flood-risk-assessment-for-planning-applications>

<https://www.gov.uk/flood-risk-assessment-local-planning-authorities>

Iceni House, Cobham Road, Ipswich, IP3 9JD

MID SUFFOLK DISTRICT COUNCIL

TO: Ian Ward – Senior Planning Officer

From: Julie Abbey-Taylor, Professional Lead – Housing Enabling

Date: 30 January 2017

SUBJECT: Residential Development at Meadow Lane, Thurston 64 dwellings

Consultation Response on Affordable Housing Requirement

Key Points

1. Background Information:

- A development of 64 dwellings.
- This development triggers Local Plan Amended Policy H4 and therefore up to 35% affordable housing would be required on this site.
- Based on 64 dwellings and therefore 22 units of affordable housing would be sought. 22 affordable units have been included in the proposal by Laurence Homes.

2. Housing Need Information:

2.1 The Babergh and Mid Suffolk District Strategic Housing Market Assessment confirms a continuing need for housing across all tenures and a growing need for affordable housing. The most recent update of the Strategic Housing Market Assessment, completed in 2012 confirms **a minimum need of 134 affordable homes per annum.**

2.2 The most recent version of the SHMA specifies an affordable housing mix equating to 41% for 1 bed units, 40% 2 bed units, 16% 3 bed units and 3% 4+ bed units. Actual delivery requested will reflect management practicalities and existing stock in the local area, together with local housing needs data and requirements.

2.3 The Council's Choice Based Lettings system currently has circa. 980 applicants registered for the Mid Suffolk area.

2.4 At May 2016 the Housing Register had 25 applicants registered for housing in Thurston and 17 of these had a local connection to the village. However as this is a planning gain site, it would be required to meet district wide need so the 980 figure is the one to be applied in this case.

- 11 x applicants with a 1 bed need
- 13 x applicants with a 2 bed need
- 6 x applicants with a 3 bed need
- 1 x applicant with a 4 bed need.

2.5. It is considered good practice not to develop a large number of affordable dwellings in one location within a scheme and therefore it is recommended that no more than 15 affordable dwellings should be located in any one part of the development.

2.6. Our 2014 Housing Needs Survey shows that there is a need across all tenures for smaller units of accommodation, which includes accommodation suitable for older people, wishing to downsize from larger privately owned family housing, into smaller privately owned apartments, bungalows and houses.

2.7 It would also be appropriate for any open market apartments and smaller houses on the site to be designed and developed to Lifetime-Homes standards, making these attractive and appropriate for older people.

3. Affordable Housing Requirement for Thurston:

| | |
|--|---|
| Affordable Housing Requirement | 35 % of units = 20 affordable units |
| Tenure Split - 75% Rent & 25 % Intermediate e.g. New Build Homebuy accommodation, intermediate rent or shared ownership. | Affordable Rent = 15 units All rented units will be let as Affordable Rent Tenancies Intermediate = Shared Ownership = 7 units |
| Detailed Breakdown Rented Units | General Needs Affordable Dwellings: <ul style="list-style-type: none"> • 2 x 1B 2P Flats @ 48 sq m • 2 x 2B 3P Bungalows @ 63 sq m • 9 x 2B 4P Houses @ 76 sq m • 2 x 3B 5P Houses @ 85 sq m 15 Total |
| Detailed Breakdown Intermediate Units | General Needs Shared Ownership dwellings: <ul style="list-style-type: none"> • 2 x 2B 4P flats @ 48 sq m • 4 x 2B 4P Houses @ 76 sq m • 1 x 3 B 5P house @ 86 sqm 7 Total |
| Other requirements | Properties must be built to current Homes and Communities Agency Design and Quality Standards and be to Lifetimes Homes standards. The council is granted 100% nomination rights to all the affordable units in perpetuity. The Local Needs affordable homes will be restricted to local people in perpetuity |

| | |
|--|---|
| | <p>The Shared Ownership properties must have a 80% staircasing bar, to ensure they are available to successive occupiers as affordable housing in perpetuity.</p> |
| | <p>The Council will not support a bid for Homes & Communities Agency grant funding on the affordable homes delivered as part of an open market development. Therefore the affordable units on that part of the site must be delivered grant free.</p> |
| | <p>The affordable units delivered on the local needs part of the site will need further consideration regarding any grant application to the HCA and a support for grant cannot be guaranteed in this instance. It is recommended that RP partners consider this matter carefully.</p> |
| | <p>The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice.</p> <p>On larger sites the affordable housing should not be placed in groups of more than 15 units.</p> |
| | <p>Adequate parking provision is made for the affordable housing units</p> |
| | <p>It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see www.midsuffolk.gov.uk under Housing and affordable housing for full details.</p> |

Julie Abbey-Taylor, Professional Lead – Housing Enabling.

Our Ref: 570/CON/4942/16
Date: 8th June 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: planningadmin@baberghmidsuffolk.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

PROPOSAL: Planning Application 4942/16 for Residential development consisting of 64 dwellings and associated highway, car parking and public open space

LOCATION: Norton Road, Thurston, Suffolk

ROAD CLASS: C

This letter is complimentary to that ref 570/CON/4942/16 dated 10th March 2017 and 3rd April 2017, which detailed 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.

Off site Highway Works

3. Condition: No dwelling shall be occupied until a pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road (uncontrolled) is constructed.

Reason: To provide safe pedestrian access from the site to the main village

4. Condition: Improvements shall be made to surface of Meadow Lane to provide a safe surface to promote cycle / pedestrian facilities (and maintain access to properties). These shall be delivered prior to occupation of the 32nd dwelling.

Reason: To ensure that Meadow Lane is suitable for use by pedestrians accessing the wider highway and public rights of way 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.

Estate Road 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.

Comment: The applicant is reminded that surface and foul drainage systems within roads proposed for adoption by the Highways Authority through Section 38 of the Highways Act (1980) shall be adopted by the relevant statutory undertaker except in exceptional circumstances.

5. 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.

Highway Drainage

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.

Travel Plan

On reviewing the application (MS/4942/16) for the proposed development of 64 dwellings on Meadow Lane in Thurston I have noticed that there has not been a Travel Plan or Transport Assessment submitted to identify any highway mitigation. Taking into account the size and location of the proposed development there would be some benefit to securing some measures to encourage sustainable travel. One such measure would be to secure a Resident Travel Pack, that includes a multi-modal voucher to allow the resident to purchase public transport tickets or cycle accessories. The value of the multi-modal voucher should be the equivalent of two monthly bus or rail tickets for travel from the site to Bury St Edmunds town centre, which is the main employment destination for Thurston residents according to the 2011 Census. Therefore the following condition is recommended:

11. Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Information Pack. No less than 3 months prior to the first occupation of any dwelling, the contents of the Residents Travel Information Pack shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information and a multi-modal travel voucher. The Residents Travel Information Pack shall be maintained and operated thereafter.

Reason: To promote use of sustainable transport.

Proposed S106 Obligations

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. Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £22056 is required on commencement of construction work on site.
2. Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road. A contribution of £4040 is required on commencement of the first dwelling.

From: Khan Wasil [mailto:Wasil.Khan@networkrail.co.uk] **On Behalf Of** Town Planning SE
Sent: 03 May 2017 11:56
To: Planning Admin
Cc: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / (anglia)

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application 5070/16 and offering us the opportunity to comment.

We have reviewed the application above and assessed the further combined developments which include the below planning applications.

- 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH – 175 dwellings
- 4963/16 / Land west of Ixworth Road, Thurston IP31 3PB – 250 dwellings
- 4942/16 / Land at Meadow Lane, Thurston IP31 3QG – 64 dwellings
- 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT – 138 dwellings
- 5070/16 - Land at Norton Road, Thurston – 200 dwellings

We note the five submitted developments have a total residential occupancy of approximately 827 units.

It should be noted that Network Rail's strategy is to close level crossings wherever possible as this removes any interface where a person or vehicle could be struck by a train. Therefore the major concern for Network Rail in relation to these proposals, is the Barrow level Crossing at Thurston Station. Historically we have seen a number of issues at this crossing and cannot accept additional impact and further usage unless mitigation and measures are introduced; therefore the preferred option in this location would be to close the level crossing.



The safety justification for closure of the crossing is set out below:

Thurston station level crossing is a footpath crossing with miniature warning lights located at the end of the platforms at Thurston. The crossing traverses two lines and is 8.9m in length, equating to a user requirement of 11.35 seconds to traverse the crossing, with a required sighting distance of 381m, of which there is currently insufficient sighting but this is mitigated by the miniature warning lights.

Trains run frequently over the crossing with approximately 124 trains running at up to 75mph for 24 hours per day with stopping and non-stopping trains.

Particular factors have to be considered for the safety of those using the crossing. Network Rail has a standard Risk Assessment tool called ALCRM (All Level Crossing Risk Model), which determines the predictive level of risk at a level crossing based on a variety of factors, including misuse, train information, number of users, the environment, available sighting etc. Based on the information entered, ALCRM calculates the risk score which generates an individual risk to a user (A to M) and a collective risk (1 to 13) with A and 1 being the highest calculated risk.

Within these risk bands, ALCRM also calculates a Fatality & Weighted Injuries (FWI) score. When the last ALCRM assessment was undertaken in July 2015, Thurston level crossing's risk score was calculated as 0.001924552 (D4), which is outside of ALCRM's high risk categories.

The proposed residential development will see the usage at this crossing increase to a greater level and therefore mitigation options to decrease the risk will need to be explored in order for Network Rail to support the planning application.

Without definitive numbers, the increase in pedestrian footfall has been modelled in ALCRM as follows:

- 75 Pedestrians per day: D4 with a FWI of 0.001924552 (Last census)
- 120 Pedestrians per day D4 with a FWI of 0.003079283
- 150 Pedestrians per day D4 with a FWI of 0.003849104
- 200 Pedestrians per day D3 with a FWI of 0.005132138

As you can see the FWI rises, with 200 pedestrians a day this would move the crossing into a High risk category. Currently a new risk assessment is being carried out and from a safety perspective if the development were to be approved then the level crossing will see a significant increase in pedestrian usage (currently 75 users per day). In all of the aforementioned pedestrian scenarios, there would be a marked increase in the risk profile at this level crossing which would therefore be unacceptable.

Given the increase in risk and increased usage at the station, we believe the development will have a severe effect on safety unless mitigation measures are introduced and contributions are provided in order to fund the closure of the crossing. The measures required to close the crossing are outlined in the attached feasibility report. In light of the 5 applications coming forward, we believe the only fair and reasonable solution would be for the applicants to share the cost of the crossing closure. The cost of the closure is estimated to be £1million, which equates to £1209.19 per dwelling.

Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied by the amount of dwellings which are permitted, to enable the closure of the level crossing.

Reason: To ensure safe and suitable access can be provided in accordance with Paragraph 32 of the NPPF.

Kind Regards,

Wasil Khan
Town Planning Technician, Property

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From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]
Sent: 06 April 2017 15:10
To: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Land at Norton Road, Thurston

Proposal: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us

within 14 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are GP1, NPPF, SC4, Cor4, RT12, CL8, C01/03, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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Agenda Item 7f

Committee Report

Committee Date: 12th July 2017

Item No:

Reference: 2797/16

Case Officer: DYJO

Description of Development: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane

Location: Land to the South of Norton Road, Thurston IP31 3QH

Parish: Thurston

Ward: Thurston & Hessett

Ward Member/s: Councillors Esther Jewson & Derrick Haley

Site Area: 11.2

Conservation Area: None

Listed Building: Manor Farm – Grade 2*, converted Manor Farm Barns - Grade 2, Church of St Peter Grade 2 – These are all buildings in the surrounding locality.

Received: 23/06/2016

Expiry Date: 30/06/2017

Application Type: Outline

Development Type: Smallscale Major Dwellings

Environmental Impact Assessment: Schedule 2 development – EIA not required.

Applicant: Hopkins Homes

Agent: Armstrong Rigg Planning

DOCUMENTS SUBMITTED FOR CONSIDERATION

The defined Red Line Plan for this application is drawing number 001 Rev A received on the 3rd November 2016. This drawing is the red line plan that shall be referred to as the defined application site. Any other drawings approved or refused that may show any alternative red line plan separately or as part of any other submitted document have not been accepted on the basis of defining the application site.

Submitted Documents:

Tree Survey (documents 1 and 2) received on 4th July 2016

Tree Protection Plan document 1 - 4 Revision A received on 4th July 2016

Illustrative layout plan reference number Thur/02 received on 4th July 2016
Phase 1 Habitat Survey received on 4th July 2016
Landscape and Visual Assessment document received on 4th July 2016
Landscape Sensitivity study received on 4th July 2016
Phase 1 Contaminated land study received on 4th July 2016
Sustainability Appraisal study received on 4th July 2016
Access visibility splay plan reference number IP15/127/11/SK02A received on 25th July 2016
Plan showing access point onto Norton Road reference number IP15/127/11/SK03A received on 25th July 2016
Plan showing improvement to pavement on Church Road reference number IP15/127/11/SK04A received on 25th July 2016
Flood Risk Assessment received on 25th July 2016 including addendum received on 10th November 2016
Geophysical Survey received on the 12th October 2016
Updated LVIA document (parts 1 - 3) received on 12th October 2016
Development framework plan reference number Thur/01 Rev C received on 3rd November 2016
Revised Travel Plan document received on 11th November 2016
Transport Assessment (parts 1 - 7) received on the 18th November 2016
Heritage Statement received on the 22nd November 2016

The application, plans and documents submitted by the Applicant can be viewed online using the following link:

<http://planningpages.midsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal= MSUFF DCAPR 108699>

Alternatively, a copy is available to view at the Mid Suffolk and Babergh District Council Offices.

SUMMARY

The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. The scheme is contrary to the adopted Mid Suffolk Core Strategy; however, the Council cannot demonstrate a 5 year supply of housing and the scheme falls to be considered under paragraph 14 of the NPPF where the adverse impacts of the scheme have to be balanced against the benefits of the scheme to demonstrate that it constitutes sustainable development. Officers are recommending a minded to approval of this application as it is considered to be sustainable development as the as the significant public benefits that the scheme will deliver (contributions towards a new school, pre-school, highway improvements, health provision, affordable housing and library facilities amongst others) are considered to outweigh the negative aspects of the proposal.

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason:

- It is a “Major” application for residential land allocation for 15 or over

dwellings.

PART TWO – APPLICATION BACKGROUND

1. This section details history, policies, advice provided, other legalisation and events that forms the background in terms of both material considerations and procedural background.

History

2. The planning history relevant to the application site is listed below. A detailed assessment of the planning history including any material Planning Appeals will be carried out as needed in Part Three:

| | | |
|---------|--|---|
| 5010/16 | Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road | Identical application to this one – Applicant has appealed to the Planning Inspectorate on the grounds of non-determination within the statutory 13 week determination timescale. |
|---------|--|---|

| | | |
|----------------|---|-----------------------|
| 0337/88/ OL | Residential development of 24.36 acres with new or altered vehicular accesses, including site for Primary School, open space and 0.5 acre for Parish Council housing. | Refused 05/04/1989 |
|----------------|---|-----------------------|

| | | |
|----------------|---|-----------------------|
| 0022/86/ OL | Residential development with allocation of open space | Refused 24/03/1986 |
|----------------|---|-----------------------|

3. The following applications are also considered to be relevant to the consideration of this proposal as they represent the other major applications for residential development in Thurston that are currently with the Council for consideration:

| | |
|---------|--|
| 4386/16 | Full planning application for the erection of 138 dwellings on land on the west side of Barton Road, Thurston. The applicant is Bovis Homes. |
|---------|--|

| | |
|---------|---|
| 4942/16 | Full planning application for the erection of 64 dwellings on land at Meadow Lane, Thurston. The applicant is Laurence Homes. |
|---------|---|

| | |
|---------|---|
| 4963/16 | Outline application for the erection of up to 250 dwellings and associated infrastructure including the provision of up to 2.4ha of land for use by the Thurston Community College and the provision of land for a new primary school on land west of Ixworth Road, Thurston. The applicant is Persimmon Homes. |
|---------|---|

5070/16 Outline application for the erection of up to 200 homes (including 9 self-build plots), land for a new primary school together with associated access, infrastructure, landscaping and amenity space on land at Norton Road, Thurston. The applicant is Pigeon Capital Management.

4. **The consideration of the cumulative infrastructure issues that this group of applications present has been explored in a collaborative, but without prejudice, working group including County and District Council Officers with the five respective applicants and their technical advisers. This has enabled a constructive and timetabled analysis of the proposals and their cumulative impact.**

Details of Previous Committee / Resolutions

5. None

Details of Member site visit

6. Members visited Thurston on the 13th June to look at this site and the four other residential development schemes that are currently with the Council for consideration.

Details of any Pre Application Advice

7. The applicant engaged with the Council and received pre-application advice on the principle of the development and its acceptability having regards to the fact that the Council does not have a 5 year supply of housing.

PART THREE – ASSESSMENT OF APPLICATION

8. Summary of Consultations

Thurston Parish Council (which includes the comments of the Thurston Neighbourhood Plan Team) - Objects to the scheme on the following grounds:

- 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 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 175 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 considers that the application 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 Primary School and Secondary School 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).
- 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 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.
- It is further believed 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).
- 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 the village 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 and entry and exit points onto the A14.

- The Parish Council would also like to recommend that Suffolk County Council be involved in the discussion of future growth in Thurston with reference to the impact that this will have on the provision of education. As mentioned within the letter from Thurston's Neighbourhood Plan Team, both the Thurston Primary Academy School and Thurston Community College are at capacity (taking into account existing planning approvals) and as such this application will ensure that the educational infrastructure is unlikely to meet the demand placed on it by 175 dwellings. The Parish Council is aware that the application is for phased development but feels that from the outset the total provision should be understood and capacity explored. As such the Parish Council feels that this application will put a negative strain on the existing infrastructure and as such would be contrary to Policy CS6 of the Core Strategy.
- The Parish Council would also like to reiterate the concerns of the Thurston Neighbourhood Plan Team with regards to the speed at which this and potentially other applications have been/are in the process of being submitted for new housing in the village. It is recognised within the village that as a Key Service Centre the village of Thurston will appeal to developers and that a certain amount of growth is desirable and non-objectionable, however the Parish Council is concerned that piecemeal development will have a negative impact on the current infrastructure and that there should be a strict control over new housing proposals and the associated numbers until the general infrastructure of Thurston and the surrounding areas has been given time to absorb new residents and the impacts that this associated growth will have on a rural village

The Parish Council has also written into the Council on the 7th October in response to the comments made by the applicant and they have reaffirmed their objection to the scheme on the grounds that they originally outlined. They have also commented on the amended plans received from the applicant and they have reconfirmed their strong objections to the scheme on the same grounds as stated above.

MSDC Heritage Officer – The site is in close proximity to the Grade II listed Church of St Peter and also to Manor Farm which is Grade 2* listed and also the barn to the north of it which is Grade II listed in its own right. The Historic Buildings Officer considers that the proposal would cause less than substantial harm to the designated heritage assets listed above as it would erode their rural setting but he also considers that the impact is low due to the existing landscaping between the site and the heritage assets. The Heritage Team recommends that refinement of the layout and landscaping scheme should be pursued. This can be done via a planning condition as the application is outline and the entire layout, design and landscaping can be altered and refined at reserved matters stage to meet this requirement.

As there are now 5 separate housing proposals in Thurston which together total 872 houses, with the potential for the cumulative impact of two or more of the schemes to have an impact on the heritage assets listed above, the Council's Heritage Officer has been asked for his comments. He considers that in terms of the assets listed above, only the Pigeon site (5070/16 and this proposal) will have a cumulative impact. He has assessed when considered together that 375 houses (up to 200 on the Pigeon site and up to 175 on this

site) on a cumulative basis would cause harm to the grade II* Listed farm house of no greater than medium. He has assessed that even adding the harm to the significance of the nearby church; the resulting cumulative level of harm to the affected heritage assets would be greater than low but not greater than medium.

MSDC - Strategic Housing (Summary) – Advises that no objections are raised to the scheme as submitted as 35% affordable housing is proposed in line with the Council's requirements. The strategic Housing Officer advises that the affordable housing provision should be provided on site as follows:

Affordable Rent Tenancy:

14 x 1b 2p flat = 50sqm

8 x 1b 2p bungalow = 50sqm

18 x 2b 4p house = 79sqm

5 x 3b 6p house = 95sqm

1 x 4b 7p house = 115sqm

Shared Ownership:

10 x 2b 4p house = 79sqm

5 x 3b 5p house = 93sqm

MSDC - Tree Officer – Does not object to the proposal subject to the trees on site that are to be retained being protected during the build process in line with the details contained in the application. Whilst a number of trees are to be removed to facilitate this development, they are of poor species and their loss will be negligible on the character and appearance of the area.

MSDC - Environmental Health - Land Contamination – Does not raise any objections to the original scheme or the amended plans. Request that conditions are imposed to control the impact of the scheme in terms of contamination.

MSDC - Environmental Health – Public Protection – Raise concerns that a number of the new dwellings will be in close proximity to the Victoria Public House and that noise, nuisance and disturbance from the operation of the pub, both inside and in the external beer garden could cause public protection issues. It has also been suggested that a condition should be imposed to control noise and disturbance during the construction phase of the scheme to ensure that the living conditions of the surrounding occupiers are protected.

SCC Archaeology – Initially objected to the scheme on the grounds that insufficient information existed to “*describe the significance of any heritage assets affected*” as required under P128 of NPPF. The applicant has carried out the additional work that was required and there are no longer any objections to this scheme on archaeological grounds. Conditions are recommended for the provision of an archaeological survey on site prior to the commencement of the development and to record any archaeologically important remains that are found.

SCC Ecology – Does not raise any objections to this scheme subject to conditions to minimise the impact of the scheme on species within the locality.

SCC Flood and water management – They initially objected to the scheme, but following the submission of additional information from the applicant, they no longer object to the application subject to the imposition of conditions dealing with flood risk matters.

SCC Highways – The Local Highway Authority has provided two responses on this proposal. One deals with the cumulative impact of this scheme and the four others that have all been submitted in Thurston on the local highway infrastructure. The second response deals with the highway issues that are specific to this proposal.

Cumulative impact - The Transport Assessments provided for the individual proposed developments show varying degrees of impact on the highway infrastructure. To date none have shown the cumulative impact of all five developments but at some locations the Local Highway Authority considers this may be severe, particularly where the network is already close to or exceeding capacity. Paragraph 21 of the National Planning Policy Framework (NPPF) states that planning policies should recognise and seek to address potential barriers to investment, including any lack of infrastructure and identify priority areas for infrastructure provision. Both SCC and MSDC are aware that paragraph 32 of the NPPF states that development should only be prevented on transport grounds where residual impacts of development as severe. The same statement allows decisions to be made taking account of whether improvements can be undertaken within the transport network that cost effectively limits the significant impacts of development.

On this occasion, the Local Highway Authority consider that by taking a co-operative approach for all five developments there is an opportunity that the planning process can provide improvements to both mitigate against any severe impacts and any lack of transport infrastructure.

Highway Infrastructure (Congestion)

The initial data and modelling provided in Transport Assessments indicates that the road network will experience additional traffic through growth and development and at some locations this will exceed the theoretical junction capacity. Those junctions that are or may exceed capacity are discussed below.

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

Modelling shows that this junction is already close to theoretical capacity in the AM peak with northbound traffic waiting to turn onto the A143 queueing on Barton Road and at capacity in the PM peak with Thurston bound traffic waiting right from the A143 into Barton Road. The additional traffic from the proposed developments in Thurston will exacerbate these problems; in particular, modelling shows the queueing traffic on Barton Road will exceed capacity in the AM peak.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

Modelling indicates that the southbound approach to the junction is currently close to capacity in the morning peak and that its capacity will be exceeded before all five developments could be delivered. However, in the PM peak the junction has the capacity for the predicted traffic for all developments.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The modelling of this junction shows some inconsistencies with one study indicating it will be close to capacity southbound on Thedwastre Road in the AM peak due to traffic from one specific development but other modelling showing it would have capacity for the traffic generated by the developments.

Highway Infrastructure (Road Safety)

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

There have been three recorded crashes resulting in slight injuries and one involving serious injury at this junction in the last 5 years for which data is available (2012-2016).

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

There have been two crashes resulting in slight injuries at this junction in the past 5 years.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

At this junction there have been 9 crashes resulting in slight injuries and one resulting in a serious injury in the past 5 years.

The frequency of injury related crashes at the C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner) junction would, in the opinion of SCC, necessitates some work to improve road safety. Although the frequency of crashes at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road does not justify significant road safety improvements it is a factor that should be considered in any future mitigation measures.

Suggested Mitigation Measures

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

An assumption has been made that the junction can be signalised and that this will reduce congestion and improve road safety. Although there is a generous width of highway verge in the vicinity of the junction the geography of the site may place constraints on the design and further work is required to confirm that a solution is possible or beneficial. The proposed junction improvements would be delivered through a jointly funded S106 contribution.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

The issue of congestion on the southbound approach is difficult to mitigate as there is insufficient land within the highway boundary to provide a meaningful solution. It is noted that the road network around Thurston is relatively permeable and an option exists for traffic to avoid this by diverting onto Beyton Road and then turning right to approach this junction from the east.

Several minor traffic management features such as improved signing, marker posts and high friction surfacing have been used at this junction in the past as crash reduction measures. Despite this, crashes causing injury continue to occur. To reduce the severity of these crashes it is proposed to restrict the road to 40mph and undertake local safety improvements such as enhanced road signs and markings. This would be delivered through a jointly funded S106 contribution.

A longer term solution would be to remodel the junction or drastically remodel the road network. It is recommended these matters should be addressed in any future revisions to the Local Plan.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The highway boundary constrains any improvements in this location and thus there does not appear to be any viable mitigation to increase capacity on the southbound Thedwastre Road approach. The relatively low number of crashes suggests that the issue of road safety is not as important as it is for the other two junctions and mitigation measures would only comprise low cost work, such as road signs and markings.

Speed Limits

It is noted that a number of proposed access roads are located close to or beyond the existing 30mph speed limit in Thurston. In some cases, assumptions have been made when determining visibility for these junctions that the 85%ile speed limits are or will be close to 30mph. Developers are advised that the visibility requirements shall be designed for the

measured 85%ile speed adjacent to the junction and not the posted or proposed future speed limit. A legal process must be followed to change or extend a speed limit and during this process objections can be made which can delay or stop creation of the necessary legal order. For this reason, the Local Highway Authority cannot accept visibility splays based on changes to speed limits unless there is confidence that no significant objections to the traffic regulation order are likely.

Based on the available details of the five proposed developments the following changes to speed limits are suggested;

- Extend the 30mph speed limit north on Ixworth Road to Thurston Rugby Club
- Extend the 30mph speed limit on Norton Road towards and beyond Church Road
- Extend of 30mph speed limit on Barton Road west of Mill Lane
- Create a new 40mph speed limit between and including the C693 Thurston Road / C692 Thurston Road / C693 New Road and the C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road for road safety reasons.

The necessary Traffic Regulation Orders (TRO) could be raised individually or preferably as a single order. The latter is preferred as it reduces cost and administration. This can be delivered through site specific or joint S106 contributions. As stated above implementation of an order cannot be guaranteed and if a TRO is required to justify reduced visibility splay lengths then the order would need to be substantially complete before such a reduction would be accepted. If a process can be agreed between the parties' initial consultation can be undertaken in advance of determination of the planning applications.

Pedestrian and Cycling Infrastructure

The benefit of considering all five applications together is that a coherent system of footways and pedestrian crossings can be delivered in Thurston. The proposed footways are intended to provide good, direct pedestrian access both to the main village and schools. The proposed improvements, most of which have already been proposed by individual applications, are listed below:

- An uncontrolled pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road.
- A footway on west side of Ixworth Road between Norton Road and the entrance to Persimmon's site
- A footway link on Ixworth Road between the entrance to the Persimmon development and the entrance to the Thurston Rugby Club.
- A controlled pedestrian crossing facility (e.g. a raised table junction with zebra crossing) if practicable at or adjacent to the Norton Road / Station Hill / Ixworth Road junction. Pooled contributions from all 5 developments are required for the County Council to deliver this.
- A footway on the north side of Norton Road from Meadow Lane east towards Church Lane as far as the site boundary allows. This could be within the development and or on the highway verge.

- An uncontrolled pedestrian on Norton Road crossing linking the Hopkins Homes and Pigeon sites
- Meadow Lane resurfaced to improve cycle / pedestrian facilities (and maintain access to properties)
- Provide a metalled footway on Church Road between Footpath 006 and the footpath link to School Lane. This will include provision of street lighting along this short section of footpath.
- Provide two uncontrolled pedestrian crossings on Sandpit Lane to link the Hopkins Homes development to the main village

With the exception of the pedestrian crossing facility at the junction of Ixworth Road, Station Hill and Norton Road, the above are expected to be secured by conditions or S106 obligations as appropriate and delivered by the relevant development with S278 (improvements to existing highway) or S38 agreements (if adoption as highway maintainable at public expense is desired) as appropriate. All the footways are expected to be metalled and where verge space allows provision for cyclists should also be considered.

Public Rights of Way (PRoW)

It is proposed that a small number of PRoW are improved to provide alternative pedestrian links between the proposed developments and current and future school sites. These are improvements to:

- Thurston Footpath 001 between Ixworth Road and Meadow Lane. It is proposed that this is to an all-weather standard, preferably a bituminous surface.
- Thurston Footpath 018 between Ixworth Road and Mill Lane. This lies within the development site and the works can be secured by condition.
- Thurston Footpath 006 between Norton Road and Church Road. This lies within the development site and the works can be secured by condition. It is proposed that this is to an all-weather standard; preferably a bituminous surface as far as it is a safe pedestrian route to the site north of Norton Road
- New PROW link along southern boundary of the Bovis Homes site to join Barton Road
- New PROW link from the site west of Barton Road to Heath Road, linking with Cycle Route 51.
- Improve PROW 007 North of Meadow Lane (un-metalled).

If diversion of a PRoW is likely it is recommended that discussions are held with the relevant SCC officer at an early state.

Public Transport

Improvements to public transport infrastructure will be limited to any site-specific works necessary as a result of each development through S106. All other public transport improvements are included in the CIL.

The Local Highway Authority advises that the remainder of the issues that are relevant to this proposal can be covered by planning conditions and within the S106 agreement for the scheme.

The S106 heads of terms will cover the following issues:

- Highway Improvement Contribution: £3733 contribution towards a Traffic Regulation Order (TRO) and associated works to extend the existing 30mph of speed limit on Norton Road eastwards to improve road safety for road users associated with the development. Payable prior to occupation of the first dwelling.
- Highway Pedestrian Crossing Improvement Contribution: £19,108 Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction to provide improved pedestrian access to the Academy and mitigate increase pedestrian and vehicle use. Payable on occupation of the first dwelling.
- Highway Capacity Improvement Contribution: £60,837 Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton to mitigate congestion at peak periods. Payable on commencement of work on site.
- Highway Safety Improvement Contribution: £11,046 Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a contribution towards 40mph speed limit on the C692 Thurston Road to improve road safety and mitigate increased use. Payable on commencement of the first dwelling.
- 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 longer.
- Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 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.

Except for the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton the reasons for requesting these contributions are described above. The A143 improvements are mitigation to improve capacity at this junction reflecting the small individual but, in terms of cumulative impact, significant effect that the five developments will have at this junction. The Local Highway Authority has indicated that the cost of this will be £94,724 for the works required under S106 of the Planning Act (excluding travel plan costs), £72,333 for works under section 278 of the Highways Act and £30,000 under S38 of the Highways Act.

SCC - Obligations Manager: Comments that 175 new houses proposed in the scheme will have an impact on local infrastructure particularly in terms of education.

Primary Provision

The residents of the scheme will generate the need for 43 new primary school places and it has been advised that there is no capacity in the local Primary School which is the Thurston

Church of England Primary Academy to accommodate this development and as such a contribution is requested towards a new primary school. As new schools cannot be provided through the Council's CIL scheme (the 123 list only allows for extensions to schools and not new schools) a request is made for a contribution towards a new school under S106 of the planning act.

A contribution for £706,477 as broken down below is require to meet education needs which will arise from this development:

| School level | Minimum pupil yield: | Required: | Cost per place £ (2016/17): |
|----------------------------------|----------------------|-----------|-----------------------------|
| Primary school age range, 5-11*: | 43 | 43 | 16,429 |

Land for new school

A contribution for a further £55,642 is also requested to contribute towards the cost of the land to provide the school. This is worked out on a maximum cost of £100,000 per acre (£247,100 per hectare, which will be £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 43 places x £1,294 per place = **£55,642**.

Temporary classroom

The Obligations Manager has also advised that there will be a need for temporary classroom arrangements to accommodate the needs of the children that arise from this development. The existing primary school is on a very constrained site and an extension to the facility is not possible under Department for Education guidelines. However, it is advised that where extra pupils either through a spike in local population or from housing development cause a 'bulge' in the admission numbers, this can be accommodated by providing temporary classrooms.

A double temporary mobile classroom providing 60 places could be located within the hard surfaced play and car park areas within the school for a period of no longer than 3 years to meet the admissions 'bulge' which would be caused by this and other large housing developments in Thurston. As the primary school is an academy whereby the County Council has limited control over its operation, agreement to the provision of the temporary building has had to be sought from the Academy board that runs the school and it is understood from the Obligations Manager, that agreement has now been given by them for this to go ahead.

The temporary classroom will be facilitated via a CIL bid as it is classified as being an extension to an existing school in the Council's 123 list.

Secondary School and 6th form provision

The Obligations Manager has commented that secondary and 6th form provision in the area is currently sufficient to accommodate the additional pupils which will be generated from this proposal as shown in the table below.

Total primary education contributions: £762,139

Restriction on occupation

The Obligations Manager has also commented that as there are two other applications in Thurston that are proposing primary school sites (application 5070/16 – Land at Norton Road for Pigeon Capital and application 4963/16 – Land West of Ixworth Road for Persimmon Homes) but neither of these are approved yet, that the district council should consider imposing a planning condition restricting occupation of any dwellings once the capacity of the existing primary school with additional temporary classroom are full. This condition could then be discharged once the construction of the new primary school has commenced.

Pre-school

The Obligations Manager has also noted that there are currently 4 pre-school establishments in the locality (2 childminders, Thurston pre-school and Tinkerbells Day Nursery) and that spare capacity between them is only 10 spaces. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution for this scheme would be based on 8 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 175 dwellings there is the need for 8 additional places
- Therefore 8 pupils x £8,333 per place = **£66,664 (2016/17 costs)**

Total contribution for all education provision - £828, 803

Other infrastructure contributions

Requests a contribution of £37,800 towards library provision. This is requested under the Council's CIL 123 list.

SCC Senior Landscape Officer: Comments that the proposal will change the character of the site which will go through a significant change from agriculture to become the edge of the settlement. The applicant amended the LVIA report in line with the Landscaping Officer's request and subsequently he has commented that the proposal is acceptable in landscape terms subject to the imposition of a number of conditions to control its impact. He has also viewed the amended plans submitted by the applicant and does not raise any additional comments or objections to this scheme.

SCC Flood Management Team:

Do not object to the application subject to the imposition of conditions dealing with flood risk matters.

The SCC Flood Management Team has been asked to comment on the cumulative impact of 827 houses being proposed in Thurston and they have commented that they would expect all of the developers to design suitable sustainable drainage systems (which they all have).

All of the 5 sites are in a flood zone 1 so they comply with national policy requirements. However, surface water drainage has historically been an issue in Thurston with soil conditions not being viable for water to drain away easily. Most of the surface water from the village is drained into the foul sewer system with the east part of the village having a surface water drainage system. It is understood that Anglian Water are considering options to improve capacity in the locality to help to prevent the flood events that have happened in the centre of the village in recent years.

SCC Public Rights of Way – Notes that public footpath number 6 runs through the site, but does not raise any objections to the scheme.

SCC Sustainability Officer - Comment that the application is deficient in terms of detail of construction materials, sources of heating, renewable energy generation, design and orientation of the dwellings or reduction in the reliance of electricity consumption has not been mentioned. Also comments that the applicant does not offer any third party accreditation for the environmental credentials of the scheme. However, it is acknowledged that the scheme is in outline form and the majority of the above information is undecided at this stage.

Anglian Water – Does not raise any objections to this proposal. They have requested that if the proposal is approved that an informative is included on the planning permission to advise the developer that Anglian Water has plant in the locality and the scheme must make provision for this

Fire Service - County Fire Officer – Does not object to the proposal, but advises that details of the location of sufficient fire hydrants to make the development safe must be submitted. This can be covered by a planning condition.

Highways England – Do not raise any objections to this scheme.

Historic England – They initially objected to the scheme on the grounds that insufficient information had been submitted to allow the impact on the setting of the listed Manor Farm and Church of St Peter to be assessed. The applicant subsequently provided this information and Historic England consider that the proposed development in the vicinity of the grade II* listed Manor Farm House and the parish church of St Peter could result in harm to the significance of the historic buildings in terms of paragraph 132 of the NPPF. They comment that as required by paragraph 134 the Council should weigh any public benefit delivered by the development against such harm when seeking the 'clear and convincing' justification required by the NPPF. We would note that the area to be left undeveloped in the north eastern corner of the site could be beneficial to the setting of Manor Farm House is suitably planted and suggest that a similar landscaping belt along the whole northern edge of the site might also mitigate, but not wholly remove the harmful impact.

Natural England – Does not have any comments to make on this application.

Network Rail – They have been consulted on the cumulative impact of building 827 new dwellings in Thurston on the railway station and the local railway network as requested by the local community. They state that the main issue is the Barrow Level Crossing at Thurston station which has historically seen a number of safety issues associated with it and the level of usage which would arise from the erection of the number of dwellings proposed

would have a severe impact on safety unless mitigation measures are introduced. They indicate that their preferred option is to close the level crossing and replace it with a new pedestrian ramp from platform 1 (upside) down the embankment leading onto Beyton Road. This design will also need to include a drop off point/layby for vehicles along Beyton Road. They have advised that the cost of the works amount to £1million and should be shared proportionally amongst the developers. They are seeking this through a S106 agreement.

When questioned, Network Rail has made it clear that the works that they propose to the crossing point at Thurston Station are directly related to the impact of the 5 planning applications and the 827 houses that would be built. They have advised that the other works that they propose to close crossing points elsewhere on the same line are minor in nature and cannot be compared to this site as the other crossing points are not facing unprecedented levels of pedestrian use which would be generated from the proposed housing in Thurston.

NHS/Primary Care Trust – The proposal will have an impact on the Mount Farm Doctors Surgery which is based in Moreton Hall, Bury St Edmunds and there will be a need to either extend or reconfigure the building to meet the additional capacity requirements that will be generated if this proposal is approved. It is recommended that a sum of £57,600 is provided as part of this application to facilitate the provision of the necessary capacity at the Mount Farm Surgery.

Suffolk Constabulary - Police Architectural Liaison – Raises concerns about the permeability of the scheme which could provide opportunities for crime. Supports the extension of the 30mph speed limit along Norton Road towards Church Road in the interest of safety.

Suffolk Preservation Society - They have advised that they have carried out a desk top survey earlier on in 2016 and considered that the site was a sustainable location having regards to its proximity to transport networks and services. They also agree with the applicant's assessment that the proposal will not result in harm to the setting of the grade II* listed Manor Farm in that it is heavily enclosed by vegetation and that its isolation which contributes to its setting will not be harmed by this proposal. It is also noted that the part of the site closest to the listed Church will remain undeveloped and landscaped which will help to preserve its setting. They have also reviewed the amended plans and have commented that in their opinion, scheme should be supported.

Representations

9. 28 letters in total have been received making comments on this scheme.
10. The objections to the scheme from 27 local residents are as follows:

Highway safety

- The local roads are inadequate and dangerous to cope with so many new dwellings.
- There are a number of dangerous junctions and pinch points in the area which will become more dangerous with the number of vehicles which will be generated by this development.
- The railway station has poor parking. Additional residents from this site using the railway station to access places such as Bury St Edmunds will increase the parking issues experienced.
- There are no pavements from the site onto Norton Road, Meadow Lane or onto

- Sandpit Lane which will cause pedestrian safety issues.
- Car users on the new access point onto Norton Road will cause conflict with pedestrians to the detriment of safety.
 - Disagree with the fact that the access onto Norton Road has been deleted in the amended plans. It should have been retained. This will now cause a greater safety problem on Sandpit Lane where the single access to cater for the whole development is proposed.
 - The internal road layout of the site should be sufficiently wide to accommodate all of the vehicles on the road safely and all houses should have garages of a suitable size to accommodate modern cars.

Infrastructure

- Will a new GP surgery be part of this scheme as local residents have to go out of Thurston at present to access this facility?
- This development will place an excessive demand on the infrastructure of the area which will need to be resolved before any of the houses could be built.
- The local primary school cannot accommodate the children from this development. Is a new local primary school proposed?

Impact on the amenity of the area

- The size of the scheme at 175 houses seems to disregard the findings of the housing survey carried out by the Neighbourhood Plans Team and is way too large for Thurston.
- The erection of 2.5 to 3 storey houses will be out of keeping with the local environment as there are none in the locality. There needs to be a height limit imposed on the dwellings if this scheme is approved to ensure that they are no higher than the existing surrounding properties.
- The additional dwellings and their infrastructure will cause increased light pollution in the locality.
- The flood risk in the area is higher than stated in the report that accompanies this application. The land regularly floods and this is clear to see.
- The erection of additional dwellings will generate more noise than the existing tranquil environment of the site and its surroundings.

Impact on residential amenity

- The erection of new houses in close proximity to my house will cause loss of privacy and overlooking over my garden.
- There needs to be substantial and dense screening between the site and the surrounding existing neighbouring properties to protect the living conditions of the existing residents.
- The Victoria Public House which adjoins the site is often noisy and has events regularly going on inside and out. This is not a problem at the moment as it doesn't have any near neighbours, but it will be a problem if houses are built in close proximity to it.

Impact on designated heritage assets

- The proposal will have a negative impact on the setting of listed buildings in the locality.

Impact on wildlife in the locality

- The scheme will impact on wildlife in the locality.

Non material planning comments

- We will lose our view over the beautiful surrounding open countryside.
- This proposal will affect the value of our property.

11. A single letter of support has been received raising the following points:

- The development will provide much needed homes to the community and young people both in Thurston and the surrounding area.
- I would like to stay in Thurston, but have found it difficult to buy a home here due to the shortage of properties. This has forced me in to a rented property which is expensive. However, if this scheme is approved, this will give me the opportunity to be able to buy my first house in the settlement that I want to live.

The Site and Surroundings

12. The application site lies in the village of Thurston which has a population of approximately 3200 people (2011 census) and extends to an area of 11.2 hectares of agricultural land (Grade 3b). The land is generally flat but falls towards the road in the northeast. The northern boundary of the site is onto Norton Road, the eastern boundary is on Church Road, the southern boundary adjoins residential properties (mixture of single and two storeys) and the western boundary fronts onto Sandy Pit Lane.

13. The site abuts the settlement boundary for Thurston and remains as countryside for planning purposes.

The Proposal

14. Please note details of the proposed development including plans and application documents can be found online.

15. Proposed is an outline planning application for the erection of up to 175 dwellings with all matters reserved except the vehicular access into the site.

16. Following advice from the highway authority, this application has been amended to omit the vehicular access off Norton Road with only one access being deemed necessary to serve the development off Sand Pit Lane.

17. The applicant has submitted plans showing a suggested layout utilising a single spine road through the site with various secondary streets leading through to the dwellings. The layout shows the retention of and strengthening of the hedge boundary on southern part of the site and also on part of the northern boundary of the site. The most eastern part of the site, which is most visible from the surrounding open countryside is to be retained as open land and will accommodate the retaining ponds for the surface water drainage for the site. However, these plans are indicative and the layout as shown may change at the reserved matters submission stage. The indicative layout gives a density of approximately 24 dwellings per hectare.

NATIONAL PLANNING POLICY FRAMEWORK

18. The National Planning Policy Framework (NPPF) contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.

The following parts of the NPPF are considered to be applicable to this scheme:

Para 6: Achieving sustainable development
Para 7: Three dimensions to sustainable development
Para 11 – 15: The presumption in favour of sustainable development
Para 17: Core planning principles
Para 32 and 34: Transport movements
Para 47: Delivering a wide choice of high quality homes (including the need to have a 5 year deliverable supply of housing)
Para 49: All housing proposals should be considered in the context of the presumption in favour of sustainable development.
Paragraph 55: To promote sustainable development in rural areas.
Paras 56 & 60: Requiring good design
Para 64: Development of poor design must not be supported.
Para 69: Promoting healthy communities
Para 70: Delivery of social, recreational and cultural facilities that the community needs.
Para 72: Provision of school places.
Para 73: Access to high quality open space.
Para 75: Protection and enhancement of public rights of way.
Para 100: Development and flood risk
Para 103: Development and increasing flood risk elsewhere
Para 109: Planning system should contribute to and enhance the natural and local environment.
Paras 112 & 117–119: Development affecting protected wildlife
Para 123: Planning and noise.
Para 125: Planning and darker skies.
Paras 128 & 129: Describing the significance of a designated heritage asset.
Para 131: Determining planning applications that affect heritage assets.
Para 132: Significance of heritage assets.
Para 134: Development and less than substantial harm
Para 186: Approaching decision taking in a positive way.
Para 187: Local Planning Authorities should find solutions rather than problems in decision taking.
Para 196: Plan led planning system.
Para 197: Assessing and determining application applying the presumption in favour of sustainable development.
P203 -206 – Planning conditions and obligations.
Paras 211 - 212: Using development plans and the NPPF in decision making.
Paras 214 – 215: The weight attached to development plan policies having regards to their consistency with the NPPF.
Para 216 – Weight given to policies in emerging plans

CORE STRATEGY

19. Core Strategy Focused Review

FC1 – Presumption in favour of sustainable development.

FC1.1 – Mid Suffolk’s approach to delivering sustainable development
FC2 – Provision and distribution of housing.

20. Core Strategy

CS1 – Settlement hierarchy
CS2 – Development in the countryside & countryside villages
CS4 – Adapting to climate change.
CS5 – Mid Suffolk’s environment
CS6 – Services and infrastructure
CS9 – Density and mix

NEIGHBOURHOOD PLAN / SUPPLEMENTARY PLANNING DOCUMENTS /AREA ACTION PLAN

21. In 2013 Thurston received a neighbourhood plan designation and the settlement is currently working on its new neighbourhood plan. The plan is however at an early stage and as yet does not have any policies which could be used in the assessment and consideration of this proposal.

SAVED POLICIES IN THE LOCAL PLAN

GP1 – Design and layout of new developments
HB1 – Protection of historic buildings
HB13 – Protecting ancient monuments
HB14 – Ensuring that Archaeological remains are not destroyed
H3 – Housing developments in villages
H13 – Design and layout of development
H15 – Development to reflect local characteristics.
H16 – Protecting existing residential amenity
H17 – Keeping new development away from pollution
CL8 – Protecting wildlife
CL11 – Retaining high quality agricultural land
T9 – Parking standards
T10 – Highway consideration in developments
RT4 – Amenity open space and play areas within residential development
RT12 – Footpaths and bridleways
SB3 – Retaining visually important landscapes

Main Considerations

22. From an assessment of relevant planning policy and guidance, representations received, the planning designations and other material issues the main planning considerations considered relevant to this case are set out including the reason/s for the decision, any alternative options considered and rejected. Where a decision is taken under a specific express authorisation, the names of any Member of the Council or local government body who has declared a conflict of interest are recorded.
23. The following are identified as the main considerations in assessing this application:

The Principle Of Development

24. The National Planning Policy Framework (NPPF) requires Councils to identify and update, on an annual basis, a supply of specific deliverable sites sufficient to provide

for five years' worth of housing provision against identified requirements (paragraph 47). For sites to be considered deliverable they have to be available, suitable, achievable and viable.

25. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites (as stated in paragraph 49 of the NPPF). Where policies cannot be considered up-to-date, the NPPF (paragraph 14) cites the presumption in favour of sustainable development and states that planning permission should be granted unless i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or ii) specific policies in the NPPF indicate development should be restricted. The presumption in paragraph 14 also applies where a proposal is in accordance with the development plan, where it should be granted without delay (unless material considerations indicate otherwise).
26. The precise meaning of 'relevant policies for the supply of housing' has been the subject of much case law, with inconsistent results. However last month, the Supreme Court gave judgment in a case involving Suffolk Coastal District Council which has clarified the position. The Supreme Court overruled earlier decisions of the High Court and the Court of appeal in this and other cases, ruling that a "narrow" interpretation of this expression is correct; i.e. it means policies identifying the numbers and location of housing, rather than the "wider" definition which adds policies which have the indirect effect of inhibiting the supply of housing, for example, countryside protection policies. However, the Supreme Court made it clear that the argument over the meaning of this expression is not the real issue. The absence of a five year housing land supply triggers the application of paragraph 14 of the NPPF. In applying the 'tilted balance' required by this paragraph, the Council must decide what weight to attach to all of the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies.
27. In accordance with National Planning Policy Guidance paragraph 030 (Reference ID: 3-030-20140306) the starting point for calculating the 5 year land supply should be the housing requirement figures in up-to-date adopted Local Plans. It goes on to state that '*...considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light....Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints...*'
28. The Council published the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA) in May 2017 which is significant new evidence for the emerging Babergh and Mid Suffolk Joint Local Plan. Therefore, the 5 year land supply has been calculated for both the adopted Core Strategy based figures and the new SHMA based figures. For determining relevant planning applications, it will be for the decision taker to consider appropriate weight to be given to these assessments and the relevant policies of the development plan.
29. A summary of the MSDC 5 year land supply position is:
 - Core Strategy based supply for 2017 to 2022 = 3.9 years

- SHMA based supply for 2017 to 2022 = 3.9 years
30. The NPPF requires that development be sustainable, and paragraph 6 of the NPPF sets out guidance on what this means in practice by drawing attention to all of the policies from paragraph 18 to 219 of the NPPF. In some circumstances there is also a presumption in favour of sustainable development which is to be applied as set out in paragraph 14 of the NPPF. This has been discussed above.
31. Paragraph 7 of the NPPF sets out three dimensions for sustainable development, economic, social and environmental:
- "an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure:*
- a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
- an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."*
32. In light of all of the above, this report will consider the proposal against the policies of the development plan to determine if the development is in accordance with the development plan as a whole. If it is not, and there are policy conflicts, they will need to be weighed against other material considerations to see whether a decision which does not accord with the development plan is warranted, in the light of the presumption in favour of sustainable development, and in the context of the authority not being able to demonstrate a 5 year land supply.

Sustainability of the Proposal (including assessment against the development plan and the NPPF)

33. The Parish Council and some of the objectors have commented that this scheme should be refused as it is outside the development limits for Thurston in line with the policies as contained in the adopted Core Strategy and Local Plan. However, it is clear on reviewing the guidance in the NPPF as outlined above that this cannot be the case as housing delivery policies CS1 and CS2 of the core strategy should not be considered to be up-to-date along with policies such as H7 of the Local Plan as the Council does not have a 5 year supply of housing as required by the NPPF. Other comments have been received stating that the Council should not consider this application and the others in the Thurston area until the Council determine in a new style local plan its stance on the location of new housing in the district. However, national policy as contained in the NPPF does not give the Council this option and requires all applications to be determined promptly.
34. The contents of paragraph 55 of the NPPF are also considered to be material in the making of a decision on this case. Objections have been received stating that this proposal should not be allowed as it is outside the settlement limit for Thurston and that the site should be considered as countryside. Paragraph 55 of the NPPF makes it clear that Councils can no longer consider sites that are adjacent or near to a

settlement limit to be unacceptable simply because they are the wrong side of the line. It now makes it clear that 'new isolated homes in the countryside will not be supported and that Councils are encouraged to promote sustainable development in rural areas by considering housing development in locations where they could enhance or maintain the vitality of rural communities. It gives an example in paragraph 55 that new housing could provide increased facilities in one settlement which would be of benefit to it and the other surrounding settlements.

35. Having regards to the above, it is considered that the application site is not in an isolated location as it is adjacent to the built up part of the village, and the scheme will bring with it contributions towards local infrastructure which will be of benefit to the residents of Thurston and the surrounding villages. Therefore, in terms of paragraph 55 of the NPPF, this proposal could be considered to promote sustainable development in a rural area. However, having regards to the fact that the Council does not have a 5 year supply of housing and has to balance the negatives of the scheme against the positives that it brings in line with the requirements of the NPPF, consideration of whether the scheme will be supported as sustainable development or not will be given in the conclusion to this report.
36. In reaching a decision, paragraph 47 of the NPPF is a material consideration and requires Local Planning Authorities to boost significantly the supply of housing, by identifying and updating annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. As stated above, the Council cannot demonstrate a 5 year supply of housing and as such paragraph 49 of the NPPF applies and states that in this situation, the relevant policies for the supply of housing in the Council's adopted plan should not be considered to be up to date and that the scheme remains to be considered under the requirements of paragraphs 7 and 14 of the NPPF which defines what sustainable development is and how decisions should be made.
37. Since the submission of this application, four other developers have also submitted application for residential development in Thurston. Bovis Homes have applied for 138 dwellings on land on the west side of Barton Road (4386/16); Persimmon have applied for 250 dwellings plus a new school on land west of Ixworth Road (4963/16); Laurence Homes have applied for 64 dwellings on land at Meadow Lane (4942/16) and Pigeon Capital have applied for 200 homes plus a school on land at Norton Road (5070/16). Including this application, 827 new homes are currently proposed in Thurston.
38. Following receipt of these applications an approach of joint working to explore cumulative infrastructure issues has been agreed between the respective applicants and the District and County Council. This has enabled the constructive exploration of significant infrastructure issues on a collaborative but without prejudice basis to a consensual timetable. Therefore, as there are unprecedented numbers of new dwellings proposed it is considered that all schemes must be considered both on their own merits and in combination with each other to assess if they meet the tests for sustainable development as outlined in the NPPF.
39. Policy FC1 of the Mid Suffolk District Core Strategy Focused Review states that it takes a positive approach to sustainable development and, as with the NPPF requirements, the Council will work proactively with developers to resolve issues that improve the economic, social and environmental conditions in the area. Related policy FC1.1 makes it clear that for development to be considered sustainable it must

be demonstrated against the principles of sustainable development. The policy goes on to say that proposals for development must conserve and enhance the local character of the different parts of the district and how it addresses the key issues of the district.

40. The settlement of Thurston is one of the two largest villages in the district of Mid Suffolk (with the other being nearby Elmswell) where a wide range of local services and local infrastructure is provided. Thurston has both a primary and a secondary school, and a number of other local facilities which act as a service to the inhabitants of the village as well as providing employment opportunities. Whilst Thurston does not have a doctor's surgery, there is one in Woolpit and another in Moreton Hall which is a reasonably short journey away either by car or via public transport.
41. Thurston is also unusual in that it has a railway station which provides access for the residents to be able to commute to Ipswich, Bury St Edmunds and further afield without having to use their cars. Thurston is also on a bus route with a number of designated stops within the village. As part of this scheme the applicant is proposing to provide bus shelters outside of the site to ensure that the future residents of the dwellings can access public transport conveniently without having to walk elsewhere in the village to get to the bus stops.
42. In relation to paragraph 7 of the NPPF, the proposals would contribute to building a strong, responsive and competitive economy through the creation of construction and related jobs and the on-going contribution to the local economy from the creation of up to 175 additional households in the area. The proposals would also contribute towards providing the supply of housing required to meet the needs of present and future generations and by having the potential to create a high quality built environment, as well as contributions towards affordable housing, the highway network and other social infrastructure (public open space, education, health care) through a CIL contribution, or where appropriate, a section 106 agreement.
43. It must also be remembered that paragraph 49 of the NPPF makes it clear that housing applications should be considered in the context of sustainable development. The applicant is proposing up to 175 dwellings in this instance and they have confirmed that it is their intention if they get planning permission to commence with work on site as soon as possible following the granting of their reserved matters application. To speed this up, they have agreed to have a shorter period than is usual to submit their reserved matters application (2 rather than 3 years) which helps to justify that as a developer, they are serious about delivering the houses. They have also signed an agreement with Mid Suffolk and Suffolk County Council to work as a group with the other 4 other developers in Thurston to contribute to and work together to achieve the necessary infrastructure within the area to make this and the other 4 schemes sustainable.
44. The Council's Sustainability Officer has objected to the scheme on the grounds that detail in terms of the build, orientation and energy efficiency of the dwellings has not been submitted. However, it should be noted that this scheme is in outline form and the applicant does not have to provide this information at this stage. This information can be addressed at the more appropriate reserved matters stage where full technical details of the layout, orientation and finish of the dwellings have to be provided.
45. Consideration of whether this proposal is considered to constitute sustainable development, having regard to the contents of policies FC1 and FC1.2 of the

Adopted Core Strategy Focused Review and the contents of the NPPF will be reached in the conclusion to this report.

Site Access, Parking And Highway Safety Considerations

46. Policy T10 of the Mid Suffolk District Local Plan provides criteria on highway considerations when assessing planning applications. This policy requires access points into and out of the site to be safe and an assessment made as to whether the existing local roads can suitably accommodate the impact of the proposal, whether adequate parking and turning spaces exist within the site and that the needs of pedestrians and cyclists have been met. This policy is considered to carry significant weight in the determination of this application as it is in compliance with paragraph 32 of the NPPF which requires all schemes to provide safe access for all.
47. A number of objections have been received to the scheme on the grounds that the use of a single access point into the site would be detrimental to highway safety and that the local road network is unsuitable for a development of up to 175 dwellings. Mention has specifically been made that some local junctions are unsafe at present (see Parish Council objection for details as well as the Local Highway Authority's consultation response), particularly those adjacent to the railway bridge to the south of the village and that this scheme will exacerbate this problem as more vehicles will be using these junctions to access local roads, particularly the A14 to reach other destinations further afield. Comments have also been received that this scheme cumulatively with the other 4 schemes that have been submitted in Thurston for residential development will cause a significant and severe impact on the road network in the locality.
48. The site is located to the north east of the village with Sandpit Lane bordering the site to the west and Norton Road to the north. This proposal originally showed two access points; one off Norton Road and a second off Sandpit Lane. The Local Highway Authority originally objected to this layout, on the grounds that the access off Norton Road was not safe and could not be altered to be made safe. They also commented that the proposal lacked a footpath link from the existing part off Church Road to the edge of the site and that the above was contrary to paragraph 32 of the NPPF which requires safe access for all. The applicant has subsequently amended the scheme in line with the comments made by the Local Highway Authority.
49. The Local Highway Authority has considered the cumulative impact of this proposal on the highway network in Thurston and they have come to the conclusion that the impact of the 5 scheme if they all come forwards will be severe. However, they have made it clear that the NPPF requires all public bodies to try and resolve problems and they are confident that if all 5 developers work together those suitable and cost effective alterations can be made to the highway network to ensure that the impact does not constitute a severe one. The Local Highway Authority has assessed the road network and has suggested alterations and improvements to key areas of it (see the Local Highway Authority's consultation response earlier in this report for more information) which all 5 developers have been asked to contribute towards through either a section 106 agreement or through the Highways Act. All 5 developers which include Hopkins Homes have agreed to contribute towards the works as requested by the Highway Authority. For the Hopkins proposal, the Highway Authority is requesting £94,724 via a S106 agreement, a further £72,333 under section 278 of the Highway Act and a further £30,000 under section 38 of the Highway Act. As such, this proposal no longer fails the requirements of paragraph 32 of the NPPF when considered cumulatively with the other 4 residential schemes as the impact with the alterations carried out to the highway network will no longer be severe.

50. The Local Highway Authority identify that the scheme will offer sustainable travel options to local residents as additional pavements and bus shelters are proposed and these will link up to both existing facilities and those proposed on neighbouring sites by the other developers seeking at the moment to build houses in Thurston. This will help to improve accessibility on foot and via public transport and will ensure that the site is accessible to the local railway station. The Local Highway Authority is also recommending that the applicant is obligated via a S106 agreement to provide a travel plan to ensure that there are sustainable transport options available to the new residents of the scheme rather than just having to rely on their private cars to access local facilities.
51. Having regards to the specific and cumulative highway impacts of the scheme when considered in line with the requirements of paragraphs 21 and 32 of the NPPF the Local Highway Authority has had regards to the fact that in some locations, the impact of the granting of 827 dwellings will be severe on the highway network, but these impacts can successfully be mitigated by the works to the network as suggested. Having regards to the above, it is considered that the proposal complies with the requirements of policy T10 of the local plan and paragraph 32 of the NPPF, in that safe and suitable access for all people can be achieved and that cost effective improvements can be undertaken to the transport network to ensure that non-motorised modes of transport can be used to access local facilities.
52. Concerns by the objectors in terms of the impact of construction traffic on the surrounding highways network, can be controlled by the imposition of a suitable condition should this scheme be granted planning permission. As the application is in an outline form, the indicative layout shows that a suitable internal layout, which would be up to the Council's highway standards, could be provided at reserved matters stage.
53. It is of merit to also note, that a public right of way (PROW) runs along the eastern end of the site and is to be incorporated into the green open part to the eastern end of the site. Having consulted with the SCC PROW Officer, it is noted that no objections have been received in relation to this aspect of the scheme.

Design And Layout [Impact On Street Scene]

54. Section 7 of the NPPF refers to design. Specifically, paragraph 56 states that good design is a key aspect of sustainable development; it should contribute positively to making places better for people. Decisions should aim to ensure that development will function well and add to the overall quality of the area, establish a strong sense of place, create attractive and comfortable places to live, work and visit, optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Furthermore it provides that development should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The NPPF goes on to state it is "proper to seek to promote or reinforce local distinctiveness" (para 60) and permission should be "refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions" (para 64). In addition policy CS5 provides that "*All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area*" and echoes the provision of the NPPF.

55. Objections have been received stating that the site is currently an open field and that dwellings of the scale and density of the proposal, particularly in reference to the indicative plans to build of 2 to 3 storey dwellings on site is considered to be inappropriate and not in keeping with the locality.
56. The application is in outline form and the plans as submitted provide an indicative layout of how the scheme could potentially look should this outline planning application be approved which relates to the principle of the development of the site. The area to the west and to the south of the site is residential in character. The dwellings to the west that border Sandpit Lane are modern predominantly two storey properties with the properties that run along the southern boundary of the site being a mixture of single and two storey properties again of relatively recent design and construction. The applicant has indicatively shown a layout which is considered to be in keeping with the residential character of the area and this can be altered to take on the concerns of any consultees and local residents at the reserved matters stage. Furthermore, the density of the scheme at approximately 24 dwellings per hectare is low and appropriate to its location and does not reflect the comments of the objectors who consider this scheme to be high density.
57. Having regards to the above, it is considered that the scheme in terms of its suggested layout constitutes good design in line with the requirements of the NPPF and local policy CS5 as it proposes a form of development that would reflect the character and appearance of the surrounding streetscape.

Parish Plan / Neighbourhood Plan

58. A Neighbourhood Plan designation was confirmed in 2013 and covers the Parish of Thurston. At the time of the consideration of this proposal the parish have set up a neighbourhood Plan Committee to prepare the policies for the new Neighbourhood Plan. Both the Parish Council and their Neighbourhood Plan Committee have objected to this scheme with the latter raising objections based on some of the early work that they have carried out for the evidence base for the new plan.
59. The Planning Practice Guidance identifies that *“Paragraph 216 of the National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan. The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals. And all representations on the proposals should have been submitted to the local planning authority by the close of the local planning authority’s publicity period. It is for the decision maker in each case to determine what is a material consideration and what weight to give to it”*.
60. As such, whilst it is ultimately for Members to determine the weight that should be given to the plan, whilst it is at an early stage in its development, it is the view of Officers that little material weight can be given at this time.

Landscape Impact

61. Paragraph 58 of the NPPF states that proposals should provide appropriate landscaping to ensure that they integrate well into the surrounding locality. This

requirement is repeated in one of the requirements of policy H13 of the Mid Suffolk District Local Plan. It is proposed to retain and strengthen the hedging on the southern part of the site and also part of the site from the dwelling on Norton Road down to the part where the existing public footpath runs through the site. The most eastern part of the site, which is bordered by Norton Road and Church Road, is the most visible from the surrounding open countryside and which would cause most harm to the surrounding countryside if developed. The indicative plans show that this is to remain undeveloped and act as an attractive green buffer between the scheme and the surrounding open countryside.

62. Objections have been received to this proposal on the grounds that the site lies in an exposed location and that the approval of this scheme will erode the intrinsic beauty and the character of the surrounding open countryside. The County Landscape Officer has been consulted on this scheme and following the submission of the amended plans he has not raised any objections to this scheme. He acknowledges that it will change the character and appearance of the surrounding open countryside, but with suitable landscaping and the provision of the green open space on the eastern side of the site its impact will be minimised both in the medium and longer term.
63. Having regards to the requirements of policy H13 of the MSDC Local Plan and paragraph 58 of the NPPF, it is considered that the scheme provides substantial landscaping both within and on the boundaries of the site to ensure that it assimilates well into the rural edge of Thurston and provides an attractive environment both for the new residents of the site and those living in the surrounding locality.

Residential Amenity

64. Policies within the adopted development plan require, inter alia, that development does not materially or detrimentally affect the amenities of the occupiers of neighbouring properties. This requirement is emphasised in the NPPF Core Values in paragraph 17 where it states that all schemes should seek a good standard of amenity for all existing and future occupants of land and buildings.
65. Objections have been received to this scheme on the basis that the dwellings running along the southern part of the site will be too close and have a negative impact on the living conditions of the occupiers. It has been noted from the site visit, that many of the properties that face north into the site on Sandpit Drive, Victoria Close and Oakfield Road have a number of windows that face into the field with a number of them not having their own boundaries between the field and their gardens and relying on the hedgerow, which is sparse in places as the boundary.
66. However, the application is in outline form with the layout plan only being indicative. The indicative plan shows the dwellings along the southern buffer of the site being separated from the existing dwellings by the estate roads and the hedging along the site boundary being strengthened. It is considered that at reserved matters stage that a suitable layout can be drawn up which would not have a negative impact on the living conditions of the surrounding neighbouring occupiers in terms of loss of privacy and residential amenity.
67. Objections to the scheme have been submitted on the grounds that the erection of houses in close proximity to the 'The Victoria Public House' which lies on the corner of Norton Road and Sandpit Lane will have a negative impact on the operation of the public house which has events both internally and externally which generate noise and nuisance. This concern has also been raised by the Council's Environmental

Health Officer. As stated above, the layout of the site is indicative and whilst dwellings have been shown adjacent to the public house, these could be removed from the scheme that is submitted at reserved matters stage to ensure that noise and nuisance matters are minimised. The reserved matters layout could also take on board the comments raised and propose a form of suitable screening and/or landscaping in this location to further reduce the impact of noise from the users of the public house. It must also be emphasised that anybody buying a house adjacent to a public house must appreciate that such premises will generate noise as stated in paragraph 123 of the NPPF and whilst measures can be put in place to reduce noise impacts, these will never be completely ameliorated whilst the building continues to operate as a public house.

68. It is considered that this proposal does not give rise to any significant concerns of loss of neighbour amenity by reason of noise, form, design, the distance between the dwellings and the substantial landscaping that is proposed along the periphery of the site and as such the proposal meets the relevant NPPF core value in paragraph 17.

Environmental Impacts - Ecology And Land Contamination

69. The application site is a grade 3b agricultural parcel of land which is adjacent to the built up part of Thurston. As the site is in an agricultural use, there is limited tree cover within the site with the majority of the trees and hedging being along the field boundaries.
70. Numerous objections have been received to this scheme on the basis that the loss of the field to create residential development will have a negative impact on animal species, particularly protected species in the locality.
71. Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) provides that all "competent authorities" (public bodies) to "have regard to the Habitats Directive in the exercise of its functions." In order for a Local Planning Authority to comply with regulation 9(5) it must "engage" with the provisions of the Habitats Directive.
72. The content of paragraph 118 of the NPPF is also applicable to the consideration of this proposal as it states that when determining planning applications, consideration must be given to 6 principles. The two following principles are applicable to this scheme:
73. If significant harm is caused which cannot be avoided or mitigated by conditions then planning permission should be refused.
74. Opportunities to integrate biodiversity in and around developments should be supported.
75. The County Ecologist has been consulted on this application and they have commented that as the majority of the site is in agricultural use, it will offer limited habitat for protected species. However, bats have been noted in the locality and she considers that in line with the requirements of the directive above and the contents of paragraph 118 of the NPPF that the scheme can be made acceptable by the imposition of conditions to control aspects such as the impact of street and residential lighting and to ensure that natural features such as the hedgerows around the site are protected during the construction of the scheme to protect habitat. It was

also noted that new habitat is proposed as part of the scheme and that a large part of the site to the east is to be retained as open space.

76. Paragraph 121 of the NPPF makes it clear that planning decisions should make sure that the site is suitable for its new use taking account the hazards of any previous use. As the site is currently a field, subject to historical agricultural practices which could have included the spraying of crops with chemicals, and part of the site appears to have been subject to historical landfill waste, a contaminated land report has been submitted to the council for consideration. The Council's Contaminated Land Officer in the Environmental Health team has reviewed the report and has advised that subject to the imposition of conditions, he does not object to the scheme. Therefore, it is considered that it is in compliance with paragraph 121 of the NPPF.

Heritage Issues (The Setting Of Neighbouring Listed Buildings)

77. Both the NPPF and Core Strategy place significant emphasis on safeguarding heritage as an important component of sustainable development.
78. With reference to the treatment of the submitted application, the Council embraces its statutory duties and responsibilities in relation to listed buildings, notably the general duties under sections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires the local planning authority to have "*special regard to the desirability of preserving [a] building or its setting or any features of special architectural or historic interest which it possesses*".
79. Recent case law on the application of the statutory duty acknowledges that the consideration of the impact of a proposed development on the significance of a designated heritage asset is a matter for its own planning judgement, but that the Local Planning Authority is required to give any such harm considerable importance and weight. However, where special regard to the desirability of preserving heritage assets has been paid and no harm is considered to be posed, the 'balancing' of harm (which should be given considerable weight as above) against public benefits as required by the NPPF, is not engaged.
80. Policy HB1 (Protection of Historic Buildings) places a high priority on the protection of the character and appearance of historic buildings, particularly the setting of Listed Buildings.
81. In paragraph 17 of the NPPF it makes it clear that development should "*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*". Para 131 goes on to state that "*In determining planning applications, local planning authorities should take account of; the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.*" Furthermore Para 132 states "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and*

convincing justification.”

82. Objections have been received to this scheme on the basis that the proposal is harmful to the setting of three listed buildings. These being the Church of St Peter which is grade II listed, Manor Farm Barn which is grade II* listed and the converted barns to the north of this building which are grade II listed. Manor Farm lies to the north of the eastern field which forms part of this application and is screened from the site by existing trees to its south which separates it from the field adjacent to Norton Road. The listed converted buildings are further north and are also screened from the field which adjoins them and the site by substantial tree screening. The Church of St Peter lies to the east of Church Road and is screened from the site by a group of dwellings to the west. However, due to the height of the church, it is visible from the site and from Norton Road.
83. Historic England and the Council's Heritage Officer have been consulted on the application and they both consider that the proposal will cause harm to the setting of these three listed buildings as they are rural based buildings in an open countryside location. Both have identified that the harm will potentially be limited with the result that the proposal must be considered to be less than substantial harm and assessed in line with the requirement of paragraph 134 of the NPPF where the harm needs to be considered and weighed against the wider public benefits that the scheme will bring forwards. It is also worth noting that the Suffolk Preservation Society supports this scheme and considers the impact on the adjacent listed buildings to be minimal if even there is any harm to their settings generated at all.
84. As there are 5 different applications for major housing development in the northern part of Thurston, the Council's Heritage Officer has been asked to consider the cumulative impact of this scheme in relation to the others. Of the 5 applications, the application by Pigeon Capital for 200 homes plus a school on land at Norton Road (5070/16) lies to the north of the Hopkins site and in combination with each other both schemes will have a cumulative impact on the setting of the listed buildings. It is considered that the other 3 sites are too far removed from the listed buildings to cause impact and as such, the Heritage Officer has been asked to consider the cumulative impact of the Hopkins and Pigeon scheme together on the three listed building previously referred to. He has stated that in his opinion the cumulative harm to the Grade II* Listed farm house would not be greater than medium and the harm to the church would be somewhere between low and medium and as such it is up to officers in line with the NPPF to assess if the harm to the listed buildings is outweighed by the public benefits that the scheme brings as outlined in paragraph 134 of the NPPF.
85. It is considered that as the Council does not have a 5 year supply of housing as required by paragraph 47 of the NPPF (the current supply is 3.9 years) that the proposal will help to contribute towards this deficit by providing up to 175 new dwellings. The scheme will also deliver 35% of the dwellings as affordable houses to help to meet the need in the locality and further contributions which cover matters such a new primary school and pre-school facility as well as providing CIL money to facilitate improvements to the doctor's surgery in Woolpit, to the local library and safety improvements at the Thurston Railway Station. The scheme will also contribute towards improvements to the infrastructure of the local area by installing a new pavement and bus shelter on Sandpit Lane and the creation of a new pavement on Church Road to link the site up to the existing pavement within the village. On a more strategic level, the scheme will also contribute towards improvements to the highway network in and around Thurston to ensure that the road network remains safe for its users.

86. The public benefit of this proposal when considered on its own is highlighted above, but when the above is considered cumulatively with the adjacent Pigeon site, which will also deliver additional houses, provide land for a new primary school and contributions towards the cost of building it, which also including a pre-school and highway infrastructure contributions and also provides CIL money to facilitate bids for library, doctor's surgery and railway station improvements, it is considered that the cumulative benefits of both schemes outweigh the low to medium harm that the proposals will have on the heritage assets identified in this report.

Environment And Flood Risk

87. Paragraph 100 of the NPPF makes it clear that inappropriate development in areas of flood risk should be avoided by directing development away from areas of highest risk. The contents of policy CS4 of the Mid Suffolk Core Strategy is in line with the requirements of the NPPF in terms of flood risk and carries significant weight in the determination of this application. In terms of flooding from rivers, the site complies with local and national policy as it lies in a flood zone 1 area which is land at least risk of flooding. To deal with surface water, the applicant is proposing a pond filled with reed within the north east corner of the site with the surface water flow from the site channelled into it.
88. Objections have been received stating that the site floods to a considerably worse extent than that identified in the Flood risk assessment. Anglian Water and the County Flood and Water team have been consulted on this proposal and both organisations have advised that they do not object to the scheme subject to the imposition of a condition requiring additional technical details relating to the submitted drainage strategy.
89. Due to unprecedented level of growth currently suggested for Thurston, the Environment Agency, County Flood and Water team and Anglian Water have been specifically asked to consider the cumulative impact of this proposal on drainage, flood risk and water supply grounds. They have advised that an increase of 827 dwellings with the mitigation measures proposed by the applicants will not increase flood risk in the locality to an unacceptable level+. Confirmation has also been received that there is capacity in the local pumping station to serve 827 new dwellings in terms of sewage needs. Thurston lies in an area where water supply can be an issue, however Anglian Water has a duty by law to supply new houses with a water supply and this is a matter for them to resolve under their legislation.
90. Having regards to the above, it is considered in terms of flood risk, drainage, water supply and drainage that the scheme when either considered singularly or cumulatively can be made acceptable subject to the imposition of a suitably worded condition to meet the requirements of paragraph 100 of the NPPF and policy CS4 of the Mid Suffolk Core Strategy.

Infrastructure - Planning Obligations / CIL contributions

91. Objections have been received to this scheme on the grounds that the local infrastructure, which includes the local schools and health care, is insufficient to meet the need of the residents of this proposal. Comment has been made that if the scheme is approved without suitable provision, then it will cause significant impact on

the existing community of Thurston.

92. The Council has now implemented CIL which accordingly takes on board requirements such as open space contribution, NHS and education contributions.
93. As part of this proposal the following contributions will be sought under the Council's CIL Scheme:
94. For the future expansion of the doctor's surgery in Moreton Hall which the residents of this scheme would use.
 - For improvements to the local library provision.
 - Safety improvements to the Thurston Railway station.
95. Objections have been received to this scheme on the grounds that a new doctor's surgery will not be provided and that the scheme will only provide 'contributions' rather than actual facilities. It should be noted that the Primary Care Trust (PCT) has made it clear that due to the existing situation with doctors, their salaries and contracts and the government's policy in terms of the NHS that a new doctor's surgery will not happen in Thurston as part of any of the 5 schemes. The PCT will be requesting contributions through CIL in relation to all 5 schemes and the monies will be used to improve the service offered and/or improve the facilities at the Woolpit Surgery and at the Park Farm Surgery in Moreton Hall to meet the expected needs of the additional residents of the new dwellings in Thurston.
96. It has been identified following discussion with the County Infrastructure Officer that as suggested by the objectors and the Parish Council, there is no capacity in the local primary school to expand and as such a contribution of £706,477 is required towards the building of a new 420 place two form primary school in the locality. It has also been suggested that a further £66,664 is required for the provision of new pre-school in the locality to help meet the demand generated by this development. As the CIL 123 list does not include the provision of new pre-school or primary school facilities (it only covers extensions to existing establishments) these contributions will have to be sought under S106 of the Planning Act. The applicant initially indicated that they would not agree to the payment of this contribution as they considered that the matter could be resolved via a CIL contribution to extend the existing school. However, the appellant has indicated to the Council that they have now reassessed the situation as the County Council has made it clear that due to a deficit of land at the school it cannot be extended as it would fail the Department for Education standards for minimum school sizes (both buildings and land) and an extension would not be allowed.
97. Whilst the new school is being built, it has been suggested that the existing school will be provided with two temporary classrooms funded via CIL to cope on a 2 to 3 year period with the increase in pupils generated from the first phase of new housebuilding in Thurston (from any of the 5 sites currently under consideration) until the new school is built. Once that happens, the existing school will be closed and the existing pupils moved over to the new school and the new school will be extended as appropriate up to a capacity of 420 pupils to accommodate the primary school age children arising from any of the proposed housing sites in Thurston. It is understood that the Diocese who own the primary school have committed to ploughing the capital receipt that they receive for the development of the existing school site into the new school which is also to be funded by a joint contribution by all 5 of the developers proposing major housing schemes currently in Thurston.

98. Following further dialogue with the County Obligations Manager it is understood that progress is being made to secure options on the potential school sites proposed in other applications. The delivery of a new primary school is a necessary pre-requisite to mitigate the potential pressure on education infrastructure from the development and it has been agreed that a restrictive phasing condition is not necessary given the progress that has been made on options. Nevertheless the securing of a primary school site is a material consideration upon which the delivery of this development is predicated.
99. As is the case for new education buildings, affordable Housing is not part of CIL and members should note that policy to seek up to a 35% provision remains in effect. The applicant has confirmed that he is agreeable to provide a policy compliant scheme for affordable housing and that this will be achieved via a Section 106 contribution.
100. Network Rail has been consulted on this scheme and has asked for a contribution of £1million through a S106 agreement between all five developers to close the existing level crossing and to provide safer and improved facilities at Thurston Railway Station having regards to the increased use of the facilities that will occur from the residents of the proposed 827 dwellings. The Council's CIL 123 list includes provision for improvements to transport infrastructure. As such it is considered that it would be appropriate for Network Rail to bid for the specified amount to make the improvements they have requested to improve pedestrian safety at the station under the CIL scheme.
101. The Local Highway Authority has, as stated earlier in the report, asked for £94,724 under section 106 of the Planning act to pay for Hopkins Homes contribution for works to the highway infrastructure to ensure that the impact of approving all 5 housing schemes totalling 872 houses in Thurston is not severe on the highway network as referred to in paragraph 32 of the NPPF. Additional monies is also being ask for travel plan initiatives for this scheme to ensure that sustainable forms of transportation is available to local residents.
102. It is noted that the applicant has stated in his supporting statement that it is his intention to gift land adjacent to the church for use as an extension site to the existing graveyard. It must be noted that this land is outside the red line site boundary for this application and the provision of this land for an extension to the graveyard is not necessary to make this application acceptable in planning term and as such fails the CIL tests outlined above. However, as stated in the applicant's supporting documents, this land can be gifted to the church regardless of the outcome of this application through other non-planning means.
103. Having regards to the above, in accordance with the Community Infrastructure Levy Regulations, 2010, the obligations recommended to be secured above by way of a planning obligation deed are (a) necessary to make the Development acceptable in planning terms (b) directly related to the Development and (c) fairly and reasonably relate in scale and kind to the Development.

Details Of Financial Benefits / Implications (S155 Housing and Planning Act 2016)

- Council Tax payments from the dwellings when built
- Planning Delivery Grant from Central Government for delivering the dwellings
- S106 Agreement:
 - £706,447 is required towards the building of a new primary school in Thurston.
 - £55,642 towards the cost of the land to provide a new primary school.

£66,664 is required for the provision of new pre-school facility in Thurston
£94,724 is required for physical highway infrastructure works.
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 longer.
Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 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.

- CIL payments per dwelling built on site.

PART FOUR – CONCLUSION

Planning Balance

104. The proposal for residential development on land at Sandpit Lane/Norton Road in Thurston and is considered to be contrary to the adopted Mid Suffolk Core Strategy as the application site lies within the countryside outside the built framework of the settlement of Thurston on what is open agricultural land.
105. However, as the housing policies in the Core Strategy are out of date due to the Council not having a deliverable five year supply of housing, this scheme falls to be considered in relation to paragraph 14 and 49 of the NPPF which relate to residential development and sustainable development.
106. Paragraph 14 states that where the development plan for the area is out of date permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole or specific policies in the NPPF which indicate that the development should be restricted. Whilst it has been identified that the proposal either when considered on its own or in combination with the four other residential schemes that are with the Council for consideration will have an adverse impact on the quality of the landscape character of the area, and that it will result in the irreplaceable loss of countryside and has an impact on the setting of three listed buildings in the locality and have a potentially severe impact on parts of the highway network, it is considered that the benefits that the scheme brings such as the provision of such as the provision of new housing of which 35% of them will be affordable, contributions towards local infrastructure such as the highways improvements, provision of open space and the new school that the appellant has agreed to contribute towards outweighs the negative issues.
107. Significant weight must also be given to the fact that there are no objections from the Council's consultees to the scheme. There are no objections in terms of design; crime prevention; amenity; pollution; contamination; ecology; landscape; flood risk and drainage either when considered in relation to the site or in combination with the 4 other proposed residential sites in Thurston.
108. In relation to highways impacts there are road safety impacts which can be addressed through mitigation at Fishwick Corner and other highways infrastructure improvements which weigh in favour of the scheme by providing enhanced sustainable links.

109. There remains a road safety and capacity issue at the A143 Thurston Road junction (adjacent to The Bunbury Arms). A number of solutions have been investigated and the current preferred solution is traffic signals. The highway authority consider that the effects of the development can be mitigated but further detailed work needs to be undertaken to obtain the most practicable and viable solution to address the risks. For this reason Committee is asked to reach a “minded to” resolution which reserves the local planning authority’s position pending the outcome of that detailed further investigation and junction design. Once the outcome of this investigation is known the application can be reported with a substantive recommendation to Committee.
110. Therefore, it is considered having regards to paragraph 14 of the NPPF that the benefit the proposal brings outweighs the negatives. Furthermore, when assessing the proposal against the NPPF it is not contrary to its requirements as a whole and there are no specific policies within it that would restrict this development and as such it is considered that it constitutes sustainable development which should be approved planning permission without delay in line with the requirements of paragraph 14.

Statement Required By Article 35 Of The Town And Country Planning (Development Management Procedure) Order 2015.

111. When determining planning applications The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain how, in dealing with the application they have worked with the applicant to resolve any problems or issues arising.
112. In this case the planning authority has worked with the applicant to overcome highway objections to the scheme and to clarify issues relating to drainage and impact on listed buildings.

Identification of any Legal Implications of the decision

113. There are no known legal implications derived from the determination of this application.
114. The application has been considered in respect of the current development plan policies and relevant planning legalisation. Other legislation including the following has been considered in respect of the proposed development.
- Human Rights Act 1998
 - The Equalities Act 2012
 - Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
 - Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
 - The Conservation of Habitats and Species Regulations 2010
 - Localism Act
 - Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

RECOMMENDATION

That Committee express a “minded to” resolution, subject to the further investigation and reporting back of highway matters in relation to the A143 Thurston Road junction, on the following basis:

That the authority would be minded to delegate to the Corporate Manager - Growth & Sustainable Planning to grant full planning permission subject to the prior completion of a Section 106 or Undertaking on terms to his satisfaction to secure the following heads of terms:

- £706,447 is required towards the building of a new primary school in Thurston.
- £55,642 towards the cost of the land to provide the new primary school.
- £66,664 is required for the provision of new pre-school facility in Thurston
- 35% Affordable Housing to be transferred over to a Registered Provider
- To secure the provision of public open space to be managed by a dedicated management company
- £94,724 to secure off site highway improvement works as listed below:
 - Highway Improvement Contribution: £2333 contribution towards a Traffic Regulation Order (TRO) and associated works to extend the existing 30mph of speed limit on Norton Road eastwards to improve road safety for road users associated with the development. Payable prior to occupation of the first dwelling.
 - Highway Pedestrian Crossing Improvement Contribution: £10,000 Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction to provide improved pedestrian access to the Academy and mitigate increase pedestrian and vehicle use. Payable on occupation of the first dwelling.
 - Highway Capacity Improvement Contribution: £10,000 Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton to mitigate congestion at peak periods. Payable on commencement of work on site.
 - Highway Safety Improvement Contribution: £50,000 Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a contribution towards 40mph speed limit on the C692 Thurston Road to improve road safety and mitigate increased use. Payable on commencement of the first dwelling.
- To secure a travel plan in connection with the scheme detailed as follows:
 - 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 longer.
 - Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 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.

and that such permission be subject to the conditions as set out below:

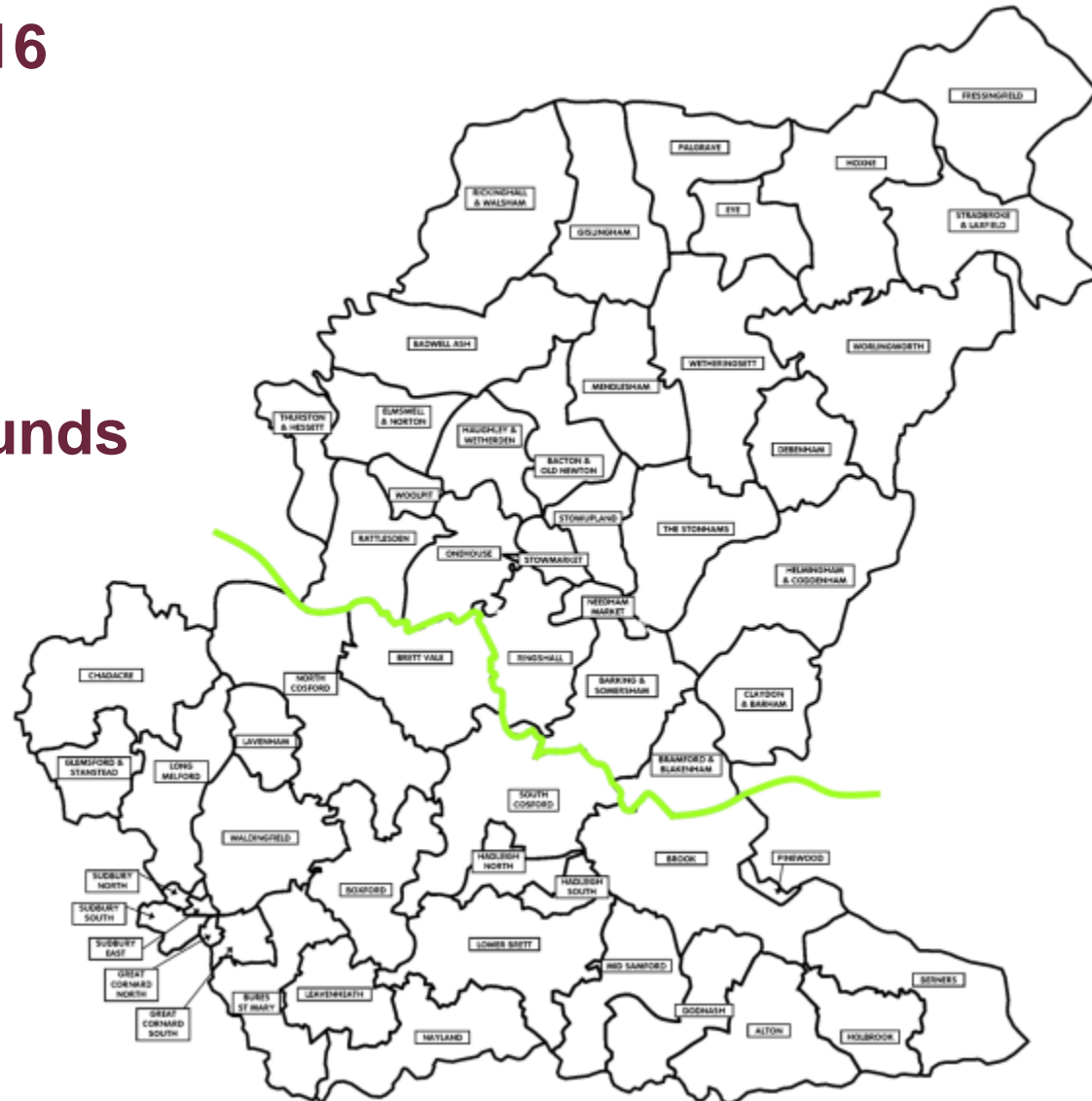
- 1) Two year time limit for submission of reserved matters (as opposed to the usual 3 years)
- 2) Reserved matters (outline)

- 3) Existing tree protection
- 4) Contaminated land
- 5) Construction management agreement
- 6) External lighting
- 7) Commencement period for landscaping
- 8) Protection of birds during construction period
- 9) Works to be carried out in line with the ecological report.
- 10) Archaeology
- 11) Highway Conditions (covering site access, Internal layout, Construction management plan, highway drainage, footway and cycle connectivity)
- 12) Surface water drainage

Application No: 2797/16

**Address: Highfield
Norton Road
Thurston
Bury St Edmunds
IP31 3QH**

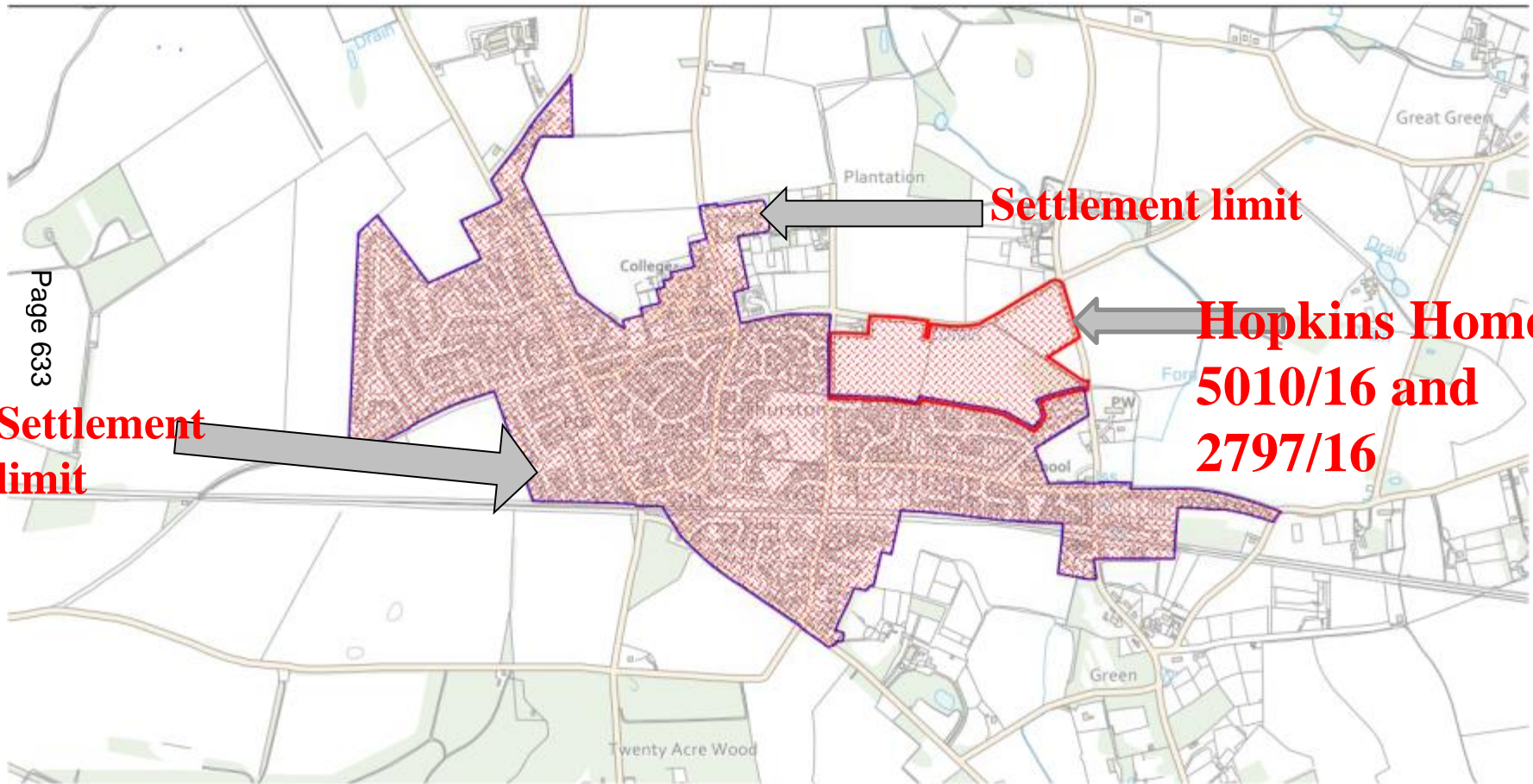
Page 631





Verbal Updates:

- Confirmation and summary of any 3rd Party representations received not previously issued to members.
- Confirmation and summary of any consultee responses received not previously issued to members
- Confirmation of any changes to recommendation, conditions or reasons.



**Settlement
limit**

Settlement limit

**Hopkins Homes
5010/16 and
2797/16**



Committee Site Plan

5010/16 Land to the South of Norton Road Thurston IP31 3QH



MID SUFFOLK DISTRICT COUNCIL

131, High Street, Needham Market, IP6 8DL
 Telephone : 01449 724500
 email: customerservice@csmiduk.com
 www.midsuffolk.gov.uk

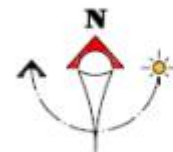
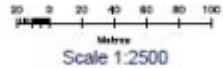


SCALE 1:2500

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- ### Key
- Site Boundary
 - New Landscaped Dell
 - Ecological And Surface Water Abatement Area Within Informal Parkland Setting
 - Vehicle Access Into Site From Drivelt Lane
 - Proposed Footpath and Gym/Ten Trail
 - Indicative Main Street
 - Indicative Secondary Street
 - Potential Footpath Link
 - Existing Public Footpath
 - Proposed Public Open Space
 - Allotments
 - Informal Historical Area
 - Proposed Churchyard Extension
 - Proposed On Footpath/Cycle way widened to 3.0m as necessary for emergency access
 - Replacement Hedge Planting Near Of Visibility Sides
 - Existing Residential Development
 - Potential Location Of Four Water Pump Station
 - Existing Hedges To Be Retained Where Possible
- ### Storey Heights
- 1 - 1.5 Storey Development: 6.0-7.0m ridge height
 - 2 Storey Development: 7.5-8.0m ridge height
 - Possible Locations for 2.5-3 Storey Development: 8.5-12.0m ridge height



Thurston, Suffolk

Development Framework Plan

Drawing Reference: Thur/01 Rev C

MELTON PARK HOUSE,
MELTON WOODBRIDGE,
SUFFOLK IP23 2D
TEL: 01284 448200 FAX: 01284 288400

Page 635

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Resource Management
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Phillip Isbell
Corporate Manager - Development Manager
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

Enquiries to: Kate Batt
Direct Line: 01284 741227
Email: kate.batt@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_2797
Date: 25th July, 2016

For the Attention of Lisa Evans

Dear Mr Isbell

**Planning Application 2797/16 – Land to the South of Norton Road, Thurston:
Archaeology**

The proposed development site comprises 11ha of gently sloping arable land. The site lies in an area of archaeological potential recorded on the County Historic Environment Record, in close proximity to the medieval Church of St Peter (THS 006). The position and date of this feature suggests that the focus of settlement in the medieval period is likely to have been further east than the current village. Several features of probable archaeological origin are visible as cropmarks on aerial photographs available through Google and Bing. Evidence from the wider vicinity suggests occupation of prehistoric (THS 018, THS 008) through to medieval (THS MISC, THS 010) periods. Given the scale and position of the proposed development, and the proximity of known heritage assets, there is potential for the discovery of previously unrecorded below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There is currently insufficient information to "*describe the significance of any heritage assets affected*" as required under P128 of NPPF. SCCAS, therefore, recommend that a programme of archaeological investigation is undertaken before submission of a planning application, to inform determination of the application with regards to the impact of the proposal on the significance of heritage assets with archaeological interest and the wider historic environment. The pre-determination programme of archaeological works should include:

- Systematic geophysical survey
- Archaeological trial trench evaluation

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

Further details on our advisory services and charges can be found on our website:
<http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Kate Batt BSc(hons)

Senior Archaeological Officer
Conservation Team

From: David Pizzey
Sent: 26 July 2016 10:29
To: Lisa Evans
Cc: Planning Admin
Subject: 2797/16 Land to the south of Norton Road, Thurston.

Hi Lisa

I have no objection in principle to this application subject to it being undertaken in accordance with the protection measures indicated in the accompanying arboricultural report.

Whilst a number of trees and sections of hedgerow are proposed for removal these are generally of limited amenity value and/or poor condition and their loss will have negligible impact on the appearance and character of the local area. If you are minded to recommend approval of the scheme we will also require details of an arboricultural monitoring schedule in

order to help ensure the protective measures referred to are implemented effectively. This information can be dealt with under condition.

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzey@baberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils - Working Together

From: Iain Farquharson
Sent: 27 July 2016 09:57
To: Planning Admin
Subject: RE: Consultation on Planning Application Land to the South of Norton Road, Thurston IP31 3QH 2797/16

Our Ref: M3 181655

Sir/Madam

In response to the consultation request on the subject of Sustainability Issues please find our response below.

The documents provided in support of the application are very good, both in depth of detail and clearly evidence research into the locality.

We have no objection to this proposal but note that sustainability issues connected to the dwellings themselves ie construction materials, sources of heating, renewable energy generation, design and orientation or reduction in the reliance of electricity consumption have not been mentioned. Also the application does not offer any 3rd party accreditation for the environmental credentials eg Code for Sustainable Homes (or its replacement scheme)

We recognise this is an outline application but we still require some forethought into this area.

The application does not provide sufficient information to address council policy CS3 Reduce Contributions to Climate Change, therefore we recommend refusal until information on this topic is made available for consideration.

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

☎ 01449 724878

✉ iain.farquharson@baberghmidsuffolk.gov.uk

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 02 August 2016 14:22
To: Planning Admin
Subject: 191775 2797/16 - Outline - for residential development of up to 175 dwellings

Dear Sir / Madam

Application ref: 2797/16
Our Ref: 191775

Natural England has no comments to make on this application.

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.

Yours faithfully

Richard Sykes
Natural England
Consultation Service
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Tel: 02080261789
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

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

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

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

From: RM Floods Planning
Sent: 03 August 2016 07:43
To: Planning Emails

Cc: Lisa Evans

Subject: RE: JS reply Planning Application 2797/16 Land to the South of Norton Road, Thurston IP31 3QH

Further to the submission of the flood risk assessment (FRA) for the site we can advise that the following need amending and or reviewing

- Calculation need to be revised and resubmitted to allow for 40% climate change and not 30% as submitted in the FRA, we also note the following in errors in the submitted calculation.
 - Submitted calculation need to be submitted using FEH method or if using IH124 done for the 50ha and pro rata down for the 6.6ha alternatively us a rate of 2l/s/ha
 - SAAR value should be 587mm and not 600mm
- No details on how the properties will drain there surface water, but It is envisage that this will go into the pipe network and then into the large attenuation area
 - We would prefer to see an above ground open surface water conveyance feature as part of this development

The infiltration rate for the attenuation area is marginally acceptable and we would like to see additional infiltration test done in this area to satisfy us that infiltration will be a viable drainage solution as no other surface water drainage solution appears to exist.

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

BABERGH/MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Chief Planning Control Officer For the attention of: Planning
FROM: ^Officer Name, Environmental Protection Team DATE: 8.8.16
YOUR REF: 2797/16/OUT. EH - Land Contamination.

SUBJECT: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space ...

Address: Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.

Please find below my comments regarding contaminated land matters only.

The Environmental Protection Team has no objection to the proposed development, but would recommend that the following Planning Condition be attached to any planning permission:

Proposed Condition: Standard Contaminated Land Condition (CL01)

No development shall take place until:

1. *A strategy for investigating any contamination present on site (including ground gases, where appropriate) has been submitted for approval by the Local Planning Authority.*
2. *Following approval of the strategy, an investigation shall be carried out in accordance with the strategy.*
3. *A written report shall be submitted detailing the findings of the investigation referred to in (2) above, and an assessment of the risk posed to receptors by the contamination (including ground gases, where appropriate) for approval by the Local Planning Authority. Subject to the risk assessment, the report shall include a Remediation Scheme as required.*
4. *Any remediation work shall be carried out in accordance with the approved Remediation Scheme.*
5. *Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.*

Reason: To identify the extent and mitigate risk to the public, the wider environment and buildings arising from land contamination.

It is important that the following advisory comments are included in any notes accompanying the Decision Notice:

"There is a suspicion that the site may be contaminated or affected by ground gases. You should be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.

Unless agreed with the Local Planning Authority, you must not carry out any development work (including demolition or site preparation) until the requirements of the condition have been met, or without the prior approval of the Local Planning Authority.

The developer shall ensure that any reports relating to site investigations and subsequent remediation strategies shall be forwarded for comment to the following bodies:

- Local Planning Authority*
- Environmental Services*
- Building Inspector*
- Environment Agency*

Any site investigations and remediation strategies in respect of site contamination (including ground gases, where appropriate) shall be carried out in accordance with current approved standards and codes of practice.

The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's Environmental Protection Team."

Nathan Pittam
Senior Environmental Management Officer

OFFICIAL



Suffolk Fire and Rescue Service

Mid Suffolk District Council
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref: 2797/16+S106
Our Ref: FS/F310954
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 09/08/2016

Dear Sirs

Land to the south of Norton Road, Thurston IP31 3QH
Planning Application No: 2797/16+S106

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

Water Supplies

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued/

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Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully



Mrs A Kempen
Water Officer

Enc: PDL1

Copy: Mr G Armstrong, Armstrong Rigg Planning, The Exchange, Colworth Science
Park, Sharnbrook, Bedford MK44 1LQ
Enc: Sprinkler information

Planningcontributions.admin@suffolk.gov.uk

Mid Suffolk District Council
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref: 2797/16+S106
Our Ref: ENG/AK
Enquiries to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 9 August 2016

Planning Ref: 2797/16+S106

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land to the south of Norton Road, Thurston
DESCRIPTION: 175 dwellings
NO: HYDRANTS POSSIBLY REQUIRED: Required

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued/

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Should you require any further information or assistance I will be pleased to help.

Yours faithfully



Mrs A Kempen
Water Officer

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From: RM PROW Planning
Sent: 09 August 2016 14:08
To: Planning Admin
Cc: geoff.armstrong@arplanning.co.uk; Sam Bye
Subject: RE: Consultation on Planning Application 2797/16

Our Ref: W523/006/ROW478/16

For The Attention of: Lisa Evans

Public Rights of Way Response

Thank you for your consultation concerning the above application.

This response deals only with the onsite protection of affected PROW, and does not prejudice any further response from Rights of Way and Access. As a result of anticipated increased use of the public rights of way in the vicinity of the development, SCC may be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Thurston Public Footpath 6 is recorded through the proposed development area.

We have no objection to these proposals.

Please include as footnotes in the decision notice:

Informative Notes:

Please note that the granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way.

Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. In order to avoid delays with the application this should be considered at an early opportunity.

The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team.

Nothing in this decision notice shall be taken as granting consent for alterations to Public Rights of Way without the due legal process being followed. Details of the process can be obtained from the Rights of Way & Access Team.

"Public Rights of Way Planning Application Response - Applicant Responsibility" and a digital plot showing the definitive alignment of the route as near as can be ascertained; which is for information only and is not to be scaled from, is attached

Regards

Jackie Gillis

Green Access Officer

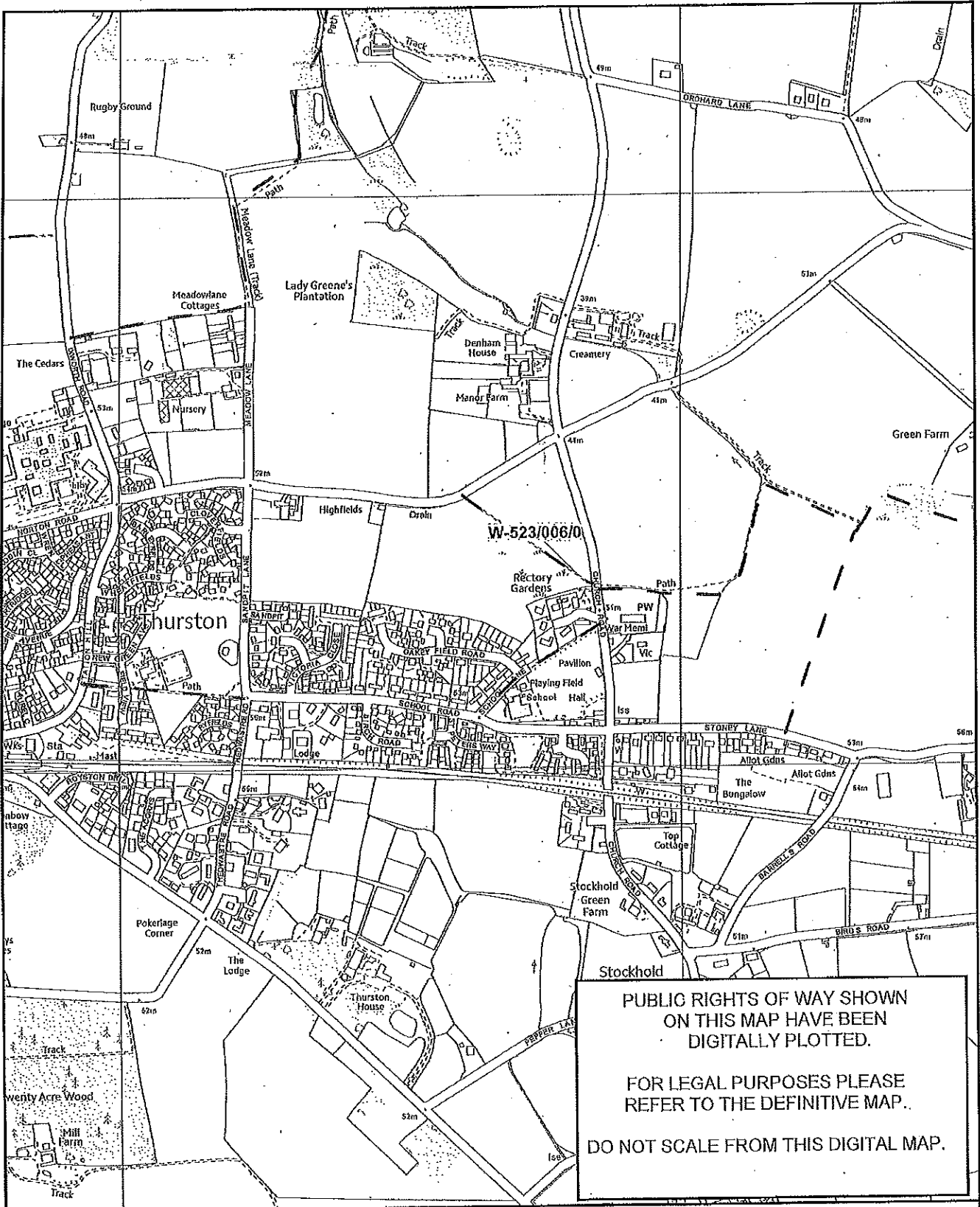
Access Development Team

Rights of Way and Access

Resource Management, Suffolk County Council

Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

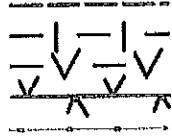
📍 <http://publicrightsofway.onesuffolk.net/> | [Report A Public Right of Way Problem Here](#)



2797/16 Land to the south of Norton Road, Thurston
Public Footpath 6



Resource Management
 Endeavour House, 8 Russell Road, Ipswich, Suffolk. IP1 2BX



Ordnance Survey MasterMap

Public Footpath
 Bridleway
 Restricted Byway
 Byway
 Definitive Map Parish Boundary

Scale 1:7500



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Date: 09/08/216



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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: 2797/16

Referring to the planning application referenced above, dated 26 July 2016, application for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, Land South of Norton Road, Thurston IP31 3QH, 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.¹

¹ Where relevant, further information will be provided within Annex A.

Date: 9 August 2016

Signature:



Name: Lorraine Willis

Position: Asset Manager

Highways England:
Woodlands, Manton Lane
Bedford MK41 7LW

lorraine.willis@highwaysengland.co.uk

Midlands and East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF
Tel: 0113 824 9111
Email: kerryharding@nhs.net

Our Ref: NHSE/MIDS/16/2797/KH

Your Ref: 2797 / 16

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

11 August 2016

Dear Sir / Madam

Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road. Land to the South of Norton Road, Thurston, IP31 3QH.

1.0 Introduction

1.1 Thank you for consulting NHS England on the above planning application.

1.2 I refer to your consultation letter on the above planning application and advise that, further to a review of the applicants' submission the following comments are with regard to the primary healthcare provision on behalf of NHS England Midlands and East (East) (NHS England), incorporating West Suffolk Clinical Commissioning Group (CCG).

2.0 Existing Healthcare Position Proximate to the Planning Application Site

2.1 The proposed development is likely to have an impact on the services of 1 main GP practice operating within the vicinity of the application site. The GP practice does not have capacity for the additional growth resulting from this development.

2.2 The proposed development will be likely to have an impact on 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.

3.0 Review of Planning Application

3.1 The planning application does not appear to include a Health Impact Assessment (HIA) or propose any mitigation of the healthcare impacts arising from the proposed development.

3.2 A Healthcare Impact Assessment (HIA) has been prepared by NHS England to provide the basis for a developer contribution towards capital funding to increase capacity within the GP Catchment Area.

4.0 Assessment of Development Impact on Existing Healthcare Provision

- 4.1 The existing GP practice does not have capacity to accommodate the additional growth resulting from the proposed development. The development could generate approximately 420 residents and subsequently increase demand upon existing constrained services.
- 4.2 The primary healthcare services within a 2km radius of the proposed development and the current capacity position is shown in Table 1.

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

| Premises | Weighted List Size ¹ | NIA (m ²) ² | Capacity ³ | Spare Capacity (NIA m ²) ⁴ |
|--------------------|---------------------------------|------------------------------------|-----------------------|---|
| Mount Farm Surgery | 12,232 | 768.40 | 11,206 | -70.37 |
| Total | 12,232 | 768.40 | 11,206 | -70.37 |

Notes:

1. The weighted list size of the GP 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. Patient Capacity based on the Existing NIA of the Practice
 4. Based on existing weighted list size
- 4.3 The development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

5.0 Healthcare Needs Arising From the Proposed Development

- 5.1 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.
- 5.2 The development would give rise to a need for improvements to capacity by way of extension, refurbishment or reconfiguration at Mount Farm Surgery; a proportion of the cost of which would need to be met by the developer.
- 5.3 Table 1 below provides the Capital Cost Calculation of additional primary healthcare services arising from the development proposal.

Table 1: Capital Cost calculation of additional primary healthcare services arising from the development proposal

| Premises | Additional Population Growth (175 dwellings) ⁵ | Additional floorspace required to meet growth (m ²) ⁶ | Spare Capacity (NIA) ⁷ | Capital required to create additional floor space (£) ⁸ |
|--------------------|---|--|-----------------------------------|--|
| Mount Farm Surgery | 420 | 28.80 | -70.37 | 57,600 |
| Total | 420 | 28.80 | -70.37 | £57,600 |

Notes:

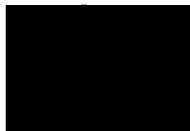
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1. Calculated using the Mid Suffolk District average household size of 2.4 taken from the 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number).
 2. Based on 120m² per GP (with 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"
 3. Existing capacity within premises as shown in Table 1
 4. Based on standard m² cost multiplier for primary healthcare in the East Anglia Region from the BCIS Q1 2014 price Index, adjusted for professional fees, fit out and contingencies budget (£2,000/m²), rounded to nearest £.
- 5.4 A developer contribution will be required to mitigate the impacts of this proposal. NHS England calculates the level of contribution required, in this instance to be **£57,600**. Payment should be made before the development commences.
- 5.5 NHS England therefore requests that this sum be secured through Community Infrastructure Levy (CIL) linked to any grant of planning permission.

6.0 Conclusions

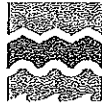
- 6.1 In its capacity as the primary healthcare commissioner, NHS England has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.
- 6.2 The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development.
- 6.3 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. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.
- 6.4 The terms set out above are those that NHS England deem appropriate having regard to the formulated needs arising from the development.
- 6.5 NHS England is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.
- 6.6 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
Estates Advisor

High quality care for all, now and for future generations



Historic England

EAST OF ENGLAND OFFICE

Ms Lisa Evans
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582721

Our ref: P00519508

11 August 2016

Dear Ms Evans

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015
LAND TO THE SOUTH OF NORTON ROAD, THURSTON IP31 3QH
Application No 2797/16**

Thank you for your letter of 22 July 2016 notifying Historic England of the above application.

Summary

This application proposes a large residential development on farmland at the northern edge of Thurston village. This land sits between the village and the grade II* listed Manor Farm House. By bringing the edge of development closer to the listed building the development has the potential to erode the rural character of this setting and so harm its significance in terms of the NPPF. The application has not assessed the significance of the house or the impact on it as required by the NPPF.

Historic England Advice

Manor Farm House was constructed in 1876 to designs by renowned architect Phillip Webb. Webb was a major figure in late Victorian architecture producing notable work in the Arts and Crafts style and, as here, in the Queen Anne Revival style. This architectural movements developed in the 1870s and looked back to English architectural traditions (in particular domestic forms from the early years of the 18th century) to create an modest, elegant, dignified and somewhat playful new language in contrast to the earnest and powerful forms of Gothic and classical which had dominated the 19th century to that point.

Chiefly a domestic form (though also used in institutional buildings such as Newnham College Cambridge and King Edward VII Grammar School, King's Lynn) the Queen Anne was often found in urban developments but its use of traditional forms and concern with quality detailing akin to the Arts and Crafts also made it suited to rural settings. In this case the house is associated with functional farm buildings (timber framed barns around a covered yard) and was placed in a working agricultural landscape, not in a suburban villa context.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

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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

Since the construction of Manor Farm House Thurston village has grown on its northern side toward the listed building, but there is still considerable undeveloped farmland around it. This is important in maintaining the original character of its setting and relationship with an agricultural landscape. The proposed development would bring further modern building (up to 175 houses and associated facilities) significantly closer to the listed building. The landscape around Thurston is relatively flat and open and the steeply pitched roof and tall chimneys of the house are quite prominent in the landscape. Indeed, the house has a large dormer window on its southern roof from which views towards the application site can probably be had. The development has the potential to bring modern development into the setting of Manor Farm House, which by eroding the rural character of its surroundings could harm its historic significance.

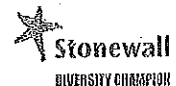
The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). The National Planning Policy Framework (NPPF) builds upon the 1990 Act. It identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings can be harmed by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favorably.

In order to allow identification of possible harm to the significance of heritage assets by proposed development paragraph 128 of the NPPF requires applicants to describe the significance of heritage assets affected and the contribution their setting might make to that significance. Sufficient information should also be provided to enable an understanding of the potential impact of the development on the assets. The Landscape and Visual Impact Assessment submitted with the current application mentions the grade II* listed house, but does not establish its significance or the effect the development might have on it. Viewpoint 6 is taken from the general area south of Manor Farm House and gives a general indication of how close the development might be to this view point. Although it is not ideal for considering the listed building we note that the Assessment concludes the impact on this view point would be 'low' but does not contain any images to demonstrate this.

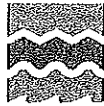


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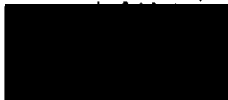
The Archaeological Desk Based Assessment also mentions Manor Farm House, but says nothing of its significance or the contribution made by its setting. Despite being a desk based exercise it concludes the application site is 'not part of the setting' of Manor Farm House. This is not a helpful statement as it is the impact of the development on any area in which the heritage asset can be 'experienced' (the definition of setting in the NPPF) that should be established.

We conclude that the application does not contain sufficient information to satisfy the requirements of paragraph 129 of the NPPF, a requirement that should be taken seriously given that Manor House Farm falls within the top 5 of listed buildings nationally. Without any such assessment we maintain our concern that the development could result in harm to the listed building's significance in terms of the NPPF paragraph 132 and would not support the granting of consent as the application stands.

Recommendation

We are concerned the proposed development in the vicinity of the grade II* listed Manor Farm House could result in harm to the significance of the historic building in terms of paragraph 132 of the NPPF. The information required by paragraph 128 to allow assessment of this impact has not been produced. We would not support the granting of consent at this stage and recommend this application is refused, but would be keen to see any further details which are submitted and offer further advice to the Council.

Yours sincerely



David Eve

Inspector of Historic Buildings and Areas
E-mail: david.eve@HistoricEngland.org.uk



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MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Lisa Evans, Development Control Team

FROM: Joanna Hart, Environmental Protection Team

DATE: 12.08.2016

YOUR REF: 2797/16/OUT

SUBJECT: Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road.

Please find below my comments regarding 'Environmental Health - Other issues' only.

Thank you for your consultation on the above application.

I note that The Victoria public house is located to the north west of the site and that illustrative masterplan shows that a number of proposed residential plots which back directly onto the public house.

The Victoria is a licensed premises which has permissions for live and recorded music, both indoors and outdoors, until 00.00hrs Monday – Thursdays and Sundays and 01.00hrs on Fridays and Saturdays. Opening hours are an additional 30 minutes each day.

I am concerned that the proximity of the public house (including noise from the beer garden and play area), particularly during the evening has potential to result in loss of amenity at the new dwellings. If substantiated noise complaints were received, it could result in the operation of the public house being fettered. I also note that there is an existing dwelling in close proximity to the public house, although I am not sure whether it is in the same ownership, although this does not the same unobstructed line of sight to the beer garden that the new dwellings would have.

The site is in proximity 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 it would be essential for a construction management plan to be required by means of condition. Such a plan shall include details of operating hours (which shall be limited to 08.00 – 18.00 Monday – Friday, 09.00 – 13.00hrs on Saturdays, with no working to take place on Sundays 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, hours of operation and vehicle movements, lighting, location and nature of compounds and storage areas (including maximum storage heights), waste removal, temporary buildings and boundary treatments, dust management, noise management and litter management during the construction phases of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

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

Kind regards
Joanna Hart
Senior Environmental Protection Officer

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

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



SENT AS AN E-MAIL

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

August 12th 2016

Dear Mr. Isbell,

Proposal: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments and vehicular access from Sandpit Lane and Norton Road

Location: Land to the South of Norton Road, Thurston

Application Number: 2797/16

The Parish Council wishes to place on record that it objects to planning application 2797/16 in its current form for the following reasons:

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 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 175 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 would also recommend that Highways be consulted as to the suitability of the location of the site; the access roads leading to the development; and pedestrian safety with regards to crossing points.

The Parish Council considers that the application 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 Primary School and Secondary School 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).

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 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.

It is further believed 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).

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 the village which will also be contrary to the sustainability objectives of Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012) and the NPPF paragraphs 14, 17, 55 and 56 and will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway bridge crossings on Barton Road and Thedwastre Road and entry and exit points onto the A14.

The Parish Council would also like to recommend that Suffolk County Council be involved in the discussion of future growth in Thurston with reference to the impact that this will have on the provision of education. As mentioned within the letter from Thurston's Neighbourhood Plan Team, both the Thurston Primary Academy School and Thurston Community College are at capacity (taking into account existing planning approvals) and as such this application will ensure that the educational infrastructure is unlikely to meet the demand placed on it by 175 dwellings. The Parish Council is aware that the application is for phased development but feels that from the outset the total provision should be understood and capacity explored. As such the Parish Council feels that this application will put a negative strain on the existing infrastructure and as such would be contrary to Policy CS6 of the Core Strategy.

The Parish Council would also like to reiterate the concerns of the Thurston Neighbourhood Plan Team with regards to the speed at which this and potentially other applications have been/are in the process of being submitted for new housing in the village. It is recognised within the village that as a Key Service Centre the village of Thurston will appeal to developers and that a certain amount of growth is desirable and non-objectionable, however the Parish Council is concerned that piecemeal development will have a negative impact on the current infrastructure and that there should be a strict control over new housing proposals and the associated numbers until the general infrastructure of Thurston and the surrounding areas has been given time to absorb new residents and the impacts that this associated growth will have on a rural village.

Yours sincerely,

Victoria S Waples

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



Your ref: 2797/16
 Our ref: 00045522
 Date: 16 August 2016
 Enquiries to: Peter Freer
 Tel: 01473 264801
 Email: peter.freer@suffolk.gov.uk

Lisa Evans
 Planning Department
 Mid Suffolk District Council
 Council Offices
 131 High Street
 Needham Market
 Ipswich
 IP6 8DL

Dear Lisa,

Re: Thurston, land south of Norton Road

I set out below Suffolk County Council's views, which provides our infrastructure requirements associated with this application and this will need to be considered by the Council.

| Proposed number of dwellings from development: | 2 bedroom+ Houses | Total |
|--|-------------------|-------|
| | 175 | 175 |
| Approximate persons generated from proposal: | 403 | 403 |

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, 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

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development in Mid Suffolk.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule On 21st January 2016 and started charging CIL on planning permissions granted from 11th April 2016. Mid Suffolk are required by Regulation 123 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 6th 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 CIL, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

Site specific mitigation will be covered by a planning obligation and/or planning conditions.

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

1. **Education.** NPPF paragraph 72 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.'

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| School level | Minimum pupil yield: | Required: | Cost per place £ (2016/17): |
|----------------------------------|----------------------|-----------|-----------------------------|
| Primary school age range, 5-11*: | 43 | 43 | 16,429 |
| High school age range, 11-16: | 31 | 0 | 18,355 |
| Sixth school age range, 16+: | 5 | 0 | 19,907 |

| | |
|--------------------------------|--------------------|
| Total education contributions: | £706,447.00 |
|--------------------------------|--------------------|

The local catchment schools are Thurston Church of England Primary Academy and Thurston Community College.

We currently forecast to have no surplus places at the catchment Primary School to accommodate children arising, but there is some capacity at the Community College. The Primary School site is landlocked and cannot be expanded and the Community College has the largest secondary catchment in the County and is unlikely that expansion would be supported in the future.

The County Council has been in discussions with the District 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.

The anticipated approach to mitigate the impacts of housing growth in the area is to provide a new primary school which would incorporate the existing primary school. This new primary school would be constructed as a 315-place school initially, capable of being expanded to 420 places to meet future development. The estimated construction cost of a 420 place primary school is £6.9 million on a 2.2 hectare site. The Mid Suffolk Regulation 123 List indicates that primary school places at new schools are not identified for funding through CIL.

The County Council will require proportionate costs to land and build costs for a 420 place primary, but discounting the 210 places in relocating the existing primary school which will be funded by the County Council. *A proportionate contribution, based on 43 children is calculated as follows

$$\begin{aligned}
 & \text{£6.9 m construction cost} / 420 \text{ primary school places} \\
 & \text{£6.9m} / 420 \text{ places} = \text{£16,429} \\
 & \text{This development creates the need for 43 additional pupil places} \\
 & \text{£16,429} \times 43 \\
 & = \text{£706,447.00}
 \end{aligned}$$

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3

This calculation excludes consideration of land costs which would be calculated as follows:

Pupils arising from this site (43) / Total site capacity (420 places)

$$43 / 420 = 0.10$$

Proportionate contribution = 10.2% of total site cost.

So, a total site to be secured for the new primary school at £100k per acre, and a total cost of £543,000 this would equate to a contribution of **£54,300** towards the land cost from this site.

The catchment secondary school is Thurston Community College. Currently this school has some spare capacity with a sixth form campus off site at Beyton. The capacity may change if the school reconfigures in the future, but Ixworth Free School could accommodate additional secondary age pupils from new houses. However, this could change when accounting for the other proposed developments in these areas. Therefore, this development is not expected to necessitate a bid for the District Council's CIL funds.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of 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 Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

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 175 dwellings, the County Council anticipates around 18 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 26 place setting, providing sufficient capacity for 52 children in total. Our latest estimates are that a 26-place early education setting costs £624,105.00 to construct on a site of approximately 641.70m² (note: this includes outdoor space).

The Mid Suffolk Regulation 123 List indicates that new early education settings are not identified for funding through CIL. A proportionate contribution, based on 18 children of the total 52 who would be accommodated within the new setting, could be calculated as follows:

£624,105 construction cost / 52 children (at a 26 – place setting)
= £12,002.02 per place

This development creates a need for 8 additional places.
£12,002.02 per place x 8 additional children
= £96,016 total proportionate contribution from 175 dwellings
£96,016 total contribution / 175 dwellings
= £549 per dwelling

Land costs are included within the calculation of the primary school land contribution.

| | Minimum number of eligible children: | Required: | Cost per place £ (2016/17): |
|----------------------------|--------------------------------------|-----------|-----------------------------|
| Pre-School age range, 2-4: | 18 | 8 | 12,002 |

| | |
|------------------------------------|-------------------|
| Required pre-school contributions: | £96,016.00 |
|------------------------------------|-------------------|

- 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.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and 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 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be co-ordinated by Christopher Fish of Suffolk County Highway Network Management and is

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expected to include:

Travel Plan – Require the applicant to submit a revised travel plan based on comments raised in the Local Highways Authority letter prior to the determination of this application. The following contributions will need to be secured by a S106 agreement. The contributions are likely to be as follows:

Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum until five years have passed after occupation of the final dwelling. 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

Travel Plan Implementation Bond - £104,631 (based on SCC calculations on the estimated cost of fully implementing the travel plan for 140 dwellings). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves

The following Section 106 obligations would also be required:

- Approval and full implementation of the Interim Residential Travel Plan
- Provision of an approved welcome pack to each resident on first occupation
- Approval and full implementation of the Full Residential 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 remedial travel plan measures if the agreed travel plan targets are not achieved

Passenger transport - A development of this size is highly likely to generate new passengers for Galloways 384 and 385 routes which currently run around the boundaries of the site. Given that they are planning site entrances from Norton Road and Sandpit Lane, and it looks likely to be able to access through the site it is expected that the bus operator will choose to divert some of the existing journeys through the site. As such, provision of new bus stops on the road are required. These should be fitted with the usual raised kerbs, bus shelters and RTP1 screens/power supplies. Current prices would be £2,500 per kerb, £6,000 per shelter including base and £10,000 per screen. The existing Cloverfield stops are located are likely to be where the new access road is proposed. They will therefore need to be moved south of the junction to enable current usage to continue whether buses are diverted through the site or not. From the plan it does not look like there will be suitable footway access through to Church Road, so the Cloverfield stops will be the nearest for any services which are not sent through the site. They should therefore also be improved.

In its role as Highway Authority, Suffolk County Council has worked with the local planning authorities to develop county-wide technical guidance on parking in light of new national policy and local research. This was adopted by the

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County Council in November 2014 and replaces the Suffolk Advisory Parking Standards (2002). The guidance can be viewed at <http://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Planning/2014-11-27%20Suffolk%20Guidance%20for%20Parking.pdf>

5. **Libraries.** Refer to the NPPF 'Section 8 Promoting healthy communities'. 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 x £3,000) = £90,000 per 1,000 people or £90 per person for library space.

Using established methodology, the capital contribution towards libraries arising sought from this scheme is stated below and would be spent on the development of library services serving the area of the development, and outreach activity from the nearest library, at Thurston and allows for improvements and enhancements to be made to library services and facilities. Thurston library has a deficient floor area against the model floor area by 29 sq metres at the local catchment library.

| | |
|-------------------------|------------|
| Libraries contribution: | £37,800.00 |
|-------------------------|------------|

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.

| | |
|---------------------|--------|
| Waste Contribution: | £ 0.00 |
|---------------------|--------|

7. Supported Housing. Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, 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 Mid.Suffolk 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:

"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 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 WMS took effect from 06 April 2015.

9. Fire Service. The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and

Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

10. Superfast broadband. 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. Direct access from a new development to the nearest BT exchange is required (not just tacking new provision on the end of the nearest line). This will bring the fibre optic closer to the home which will enable faster broadband speed. Refer to the NPPF paragraphs 42 – 43.

11. Legal costs. SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.

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

13. Summary Table split by developer contributions mechanism

| Service Requirement | Contribution per dwelling | Capital Contribution |
|---------------------------------------|---------------------------|----------------------|
| Education – Primary – see table below | | |
| Education – Secondary | £ 0.00 | £ 0.00 |
| Education – Sixth Form | £0.00 | £ 0.00 |
| Pre-School – see table below | | |
| Transport - see section 4 above | | |
| Libraries | £216.00 | £37,800.00 |
| Waste | £0.00 | £0.00 |
| Total | £216.00 | £37,800.00 |

The table above would form the basis of a future bid to the District Council for CIL funds if planning permission was granted and implemented. This will be reviewed when a planning application for planning permission is submitted.

| Service Requirement | Contribution per dwelling | Capital Contribution |
|--|---------------------------|----------------------|
| Education – Primary places including land cost | £4,347.13 | £760,747.00 |
| Pre-School | £548.66 | £96,016.00 |
| Total | £4,895.79 | £856,763.00 |

Dependent on the submitted details, if a planning application was submitted we would expect the above to be requested as a **planning obligation under Section 106** to provide proportionate contributions to a new primary school and pre-school setting.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
 Senior Planning and Infrastructure Officer
 Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC
 Iain Maxwell, SCC

From: Griss, Steve [mailto:Steve.Griss@suffolk.pnn.police.uk]
Sent: 18 August 2016 12:19
To: Julie Havard
Subject: Planning Application 2797/16 - Hopkins Homes, Thurston

Julie

Planning Application 2797/16 - Hopkins Homes, Thurston

I am the Traffic Management Officer for Suffolk Constabulary and reply only in relation to the traffic management part of the application.

I have no objection to the scheme but ask that consideration be given to the following:

1. There was mention in the application of extending the 30 mph speed limit in Norton Road towards the direction of Church Road. In my view this is essential to protect the new entrance/exit to the development and to ensure vehicles are entering the area at appropriate speeds. The extension needs to be sufficient distance and be highly visible to get the message across to drivers.
2. There are many routes that drivers will be able to take travelling to and from the new development. My view is that it is highly likely that Sandpit Lane will be a choice for many. This raises concerns in relation to the Thedwastre Road priority scheme over the railway bridge and the stop sign/line at the junction of Thurston Road (Pokerage Corner). I assume the stop sign was put up in the first place as a result of the reduced visibility. It was suggested in the application that the Church Road route would be more attractive for drivers. That may be the case but I wonder how the developers will make that happen.

Thank you for the opportunity to comment.

Regards,
Steve

Steve Griss

Traffic Management Officer

Specialist Operations

Suffolk Constabulary

Portal Avenue

Martlesham Heath, Suffolk, IP5 3QS

Tel: 01473 613713

www.suffolk.police.uk

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Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00016190
Local Planning Authority: Mid Suffolk District
Site: Sandpit Lane, Thurston
Proposal: Creation of 175 x C3 Dwellings
Planning Application: 2797/16

Prepared by: Mark Rhodes

Date: 31 August 2016

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, via a pumped connection to the public foul sewer in Sandpit Lane at a rate of 3.8l/s. 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 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



Consultation Response Pro forma

| | | | |
|---|---|--|-----------------------------|
| 1 | Application Number | 2797/16 Norton Road, Thurston | |
| 2 | Date of Response | | |
| 3 | Responding Officer | Name: | Paul Harrison |
| | | Job Title: | Heritage and Design Officer |
| | | Responding on behalf of... | Heritage |
| 4 | Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because it would erode the rural setting of Manor Farmhouse. 2. The Heritage Team recommends that refinement of the layout and landscaping scheme be pursued. | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | <p>Statutory duty Recent court rulings have confirmed that the statutory duties in the Planning (Listed Buildings and Conservation Areas) Act 1990 have the effect of a strong presumption against harm to listed buildings and their setting. Any harm is to be given great weight in decision-making. Similarly the National Planning Policy Framework expects great weight to be afforded to the conservation of listed buildings and their setting (conservation being defined as preservation from harm and enhancement where appropriate).</p> <p>The following assessment applies the method set out in Historic England's advice note GPA3 <i>The Setting of Heritage Assets</i>.</p> <p>Heritage assets The site is a large area of agricultural bordering the existing settlement to its west and south. It comes close at its easternmost point to the Church of St Peter, listed Grade II, and at its north-east corner to Manor Farm, listed Grade II*, and its associated barn complex listed Grade II and now converted. Other heritage assets are at such a distance that the proposed development would have no material impact.</p> <p>The setting and significance of assets St Peter's Church is a medieval parish church largely rebuilt about 1861 following the collapse of the tower onto</p> | |

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.

| | | |
|---|---|---|
| | | <p>the nave. The church and tower continue the function of the original building as landmark for the community. Thurston is historically a very scattered settlement and the church has always stood quite detached from the village along with a cluster of houses. The church tower is readily visible from the site, and is a prominent landmark along the footpath across the eastern part.</p> <p>Manor Farmhouse does not seem to succeed an earlier building, but is associated historically with Nether Hall to the north. As such its agricultural surroundings make a less important contribution to its significance, which relies mainly on its being designed by Philip Webb, one of the most influential British architects and designers of the late 1800s. Webb was also architect for contemporary alterations and additions to Nether Hall. Unusually, the Farmhouse is designed in the 'Queen Anne' style, echoing urban brick buildings of about 1700, which contrasted with the more ostentatious gothic revival style of the mid-1800s. It is therefore in the vanguard of architectural design in the 1870s.</p> <p>In its north-east corner the site slopes away towards the stream, and the fall continues past Manor Farmhouse. This gives the Farmhouse and farm buildings some sense of seclusion from the level plateauland of most of the site. A line of poplars on the roadside to the south of the Farmhouse contributes to this sense. Although the Farmhouse is tall and has tall chimneys and a viewing platform on its roof, it is not readily visible from much of the site. The introduction of horse-related development around the Farmhouse, and residential development round the converted farm buildings has also eroded the rural character of the area.</p> <p>Impact of the proposal The proposal has potential to harm the setting of both listed buildings by introducing a large area of residential development into their largely rural surroundings; this would be more noticeable at Manor Farmhouse which is currently experienced as an isolated rural building.</p> <p>Only from the footpath within the site would there be noticeable impact on existing views towards the church with new development to the south of the path. Views across the site would become intermittent rather than interrupted. The impact would be significant in a limited arc of views, and harm would be low.</p> |
| 6 | Amendments, Clarification or Additional Information Required | The illustrative plan shows that open space would be preserved towards the east end of the site, and that housing development would be limited to the level part. A |

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| | | |
|---|--|--|
| | <p>(if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p> | <p>belt of tree planting would run along the north-east edges of the built development. Heritage would recommend that the distribution of open space within the site be re-considered with a view to keeping built development back from the north-eastwards slope. The depth and composition of the north-eastern planting belts should be enhanced; the Landscape Officer's advice should be sought on this point.</p> |
| 7 | <p>Recommended conditions</p> | |

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.

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Babergh & Mid Suffolk District Councils, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Mrs S Hooton
Senior Ecologist
Natural Environment Team
Suffolk County Council
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Russell Road
Ipswich
Suffolk IP1 2BX

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Fax: 01473 216889
Email: sue.hooton@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Your Ref: 2797/16
Our Ref: Ecology/MSDC/Norton Rd Thurston
Date: 23rd September 2016

Ms Lisa Evans
Planning Dept
Mid Suffolk District Council
131 High St
Needham Market
Suffolk
IP6 8DL

Dear Lisa,

Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road Land to the South of Norton Road, Thurston IP31 3QH

Based on the ecological reports provided by the applicant and a site visit carried out, on the 26th July, with the SCC Senior Landscape Officer Mr Phil Watson, I offer the following comments:

Likely Ecological Impacts

Both ecological reports were undertaken by suitably qualified ecologists with the necessary skills and experience to conduct this type of assessments and precautionary measures recommended to maintain biodiversity, protected and priority across the development site.

The Extended Phase 1 habitat survey report (Southern Ecological Solutions, June 2016) identified that except for a hedgerow survey, no additional surveys were considered necessary to assess the likely impacts of the proposed development on biodiversity. This is despite the report noting (para 5.19) that the hedgerow habitats were likely to be of potential value to bats for foraging and /or commuting.

A Hedgerow Survey report (Southern Ecological Solutions, June 2016) has been submitted and confirmed losses of this Priority habitat with recommended mitigation and

enhancement measures to avoid significant adverse impacts. However as no bat activity surveys were carried out, the assessment of the hedgerows to be lost to the development did not include any use of them by Annex 2 bat species or significant use by common bat species.

I am concerned therefore that the likely impact of the development on bats (European Protected Species) may have been underestimated. However given that the 2 hedgerows to be severed are isolated from the network in the wider countryside and bat sensitive lighting is recommended to minimise light falling on boundary trees and hedgerows (using directional LED or lamps fitted with shields), in this instance I am satisfied that no further survey or assessment can be reasonably required as likely impacts can be dealt with by condition of any consent.

Although the report dismisses the likelihood of breeding or wintering birds being present, there is no consideration of use of the site by farmland birds such as skylark. Having visited the site, I consider that the availability of nesting habitat for this species is limited as the boundary trees and hedges mean that the field size is too small for them to attempt nesting, but I would have expected to read a justification such as this to adequately consider this Priority species. The report includes consideration of hedgehogs and brown hare and recommends enhancements including fencing including cut-outs which should be implemented throughout the development.

Recommendations

Subject to the conditions below in respect of planting and landscaping and a condition to control the design & ecological impact of external lighting, I am satisfied that significant impacts on bats (European Protected Species) can be adequately controlled:

1. CONCURRENT WITH RESERVED MATTERS: EXTERNAL LIGHTING

No external lighting shall be provided within a development area or phase unless details thereof have first been submitted to and approved in writing by the Local Planning Authority. Prior to commencement a detailed lighting scheme for areas to be lit shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall show how and where external lighting will be installed, (through technical specifications and the provision of appropriate lighting contour plans which shall include lux levels of the lighting to be provided), so that it can be;

- a) Clearly demonstrated that areas to be lit have reasonably minimised light pollution, through the use of minimum levels of lighting and features such as full cut off cowls or LED.
- b) Clearly demonstrated that the boundary vegetation to be retained, as well as that to be planted, will not be lit in such a way as to disturb or prevent bats using their territory or having access to their breeding sites and resting places or foraging areas, through the use of minimum levels of lighting and features such as full cut off cowls or LED.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved scheme, and shall be 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.

2. CONCURRENT WITH RESERVED MATTERS: SOFT LANDSCAPING

No development shall commence within a development area or phase, until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for that development area/phase, drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities, weed control protection and maintenance and any tree works to be undertaken during the course of the development. This scheme of shall also include the planting required to provide the necessary ecological mitigation and enhancement identified in the application. Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

3. PROTECTION OF BREEDING BIRDS DURING CONSTRUCTION

No removal of hedgerows, trees or shrubs shall take place in any phase of the development, between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the Local Planning Authority.

4. CONCURRENT WITH RESERVED MATTERS: RECOMMENDATIONS AS SET OUT IN ECOLOGICAL REPORT (BIODIVERSITY MITIGATION AND ENHANCEMENTS)

The development shall be carried out in accordance with the recommendations as set out in Section 5 of the Extended Phase 1 habitat survey report (Southern Ecological Solutions, June 2016)

Reasons

1. The applicant has provided sufficient information to allow the LPA to discharge its duties under the UK Habitats Regulations.
2. The applicant has provided sufficient information to allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended.
3. The applicant has provided sufficient information to allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority Species)

I have made these recommendations in order to minimise the impact of the proposal on ecology and having due regard for the NPPF and Policy CS5, as well as the statutory obligations of the LPA.

Yours sincerely

Sue Hooton CEnv CMIEEM
Senior Ecologist

Phil Watson Senior Landscape Officer
Natural Environment Team

Endeavour House (B2 F5 47)
Russell Road
IPSWICH

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Suffolk
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Email: phil.watson@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Your Ref: 2797/16
Our Ref:
Date: 04/10/2016

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Ms Lisa Evans
Planning Dept
Mid Suffolk District Council
131 High St
Needham Market
Suffolk
IP6 8DL

Dear Lisa,

Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road Land to the South of Norton Road, Thurston IP31 3QH

Based on the information provided by the applicant and a site visit carried out, on the 26th July, with the SCC Senior Ecologist Mrs Sue Hooton, I offer the following comments.

The site and landscape

The site is on arable land at the edge of the village and as a result only parts of the site have a very close relationship the existing built form. The eastern parts of the site are visually exposed and visible from the wider countryside to the east.

The information provided by the applicant

The applicant has provided a reasonably effective LVIA which has assessed the proposal in outline as two storey dwellings. The findings recognise the sensitivity of the site and as a result have suggested how the scheme should be designed.

However, the outline scheme as set out on drawing Thur/01 *Development Framework Plan* does not appear to wholly reflect the basis on which the LVIA as it includes some housing of up to three storeys.

It is also notable that the LVIA has attempted dealt with potentially significant heritage issues which it may have been more appropriate to deal with in a Heritage Assessment. In

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consultation with the LPA the applicant has subsequently submitted a Heritage Assessment. This is a matter for the Conservation Officers and other relevant consultees to provide detailed advice.

Likely Landscape and Visual effects

The character of the site itself will also undergo very significant change. As a consequence there will be a significant change in outlook for adjacent residents. The proposal will create a new built edge to the village and on the eastern side this will have a more widespread visual impact.

The submitted LVIA has identified the sensitivity of the eastern part of the site, the impacts on the setting of a Grade II* listed building, and the sensitivity of, and impact on, footpath users.

I therefore suggest that a detailed Landscaping Masterplan is required in order to demonstrate in more detail how these issues will be dealt with should be secured by condition. The agreed landscape masterplan would then form the basis of the detailed conditions in respect of hard and soft landscaping, as well as ecological mitigation open space and SuDs layout.

This plan should also clarify the distribution of dwelling heights across the site.

It should be noted that these comments do not deal with impacts on the setting of adjacent listed buildings or impacts on the conservation area. This is a matter for the Conservation Officers.

Recommendations

I note that the parameter plan Thur/01 is not clear in respect of the height and location of 2.5-3 storey housing. I suggest that given the sensitivity of the receiving landscape, and for the avoidance of doubt, the parameter plan Thur/01 should be updated to *confirm* the proposed layout and maximum heights prior to determination.

Based on the findings of the LVIA it is likely that the most eastern block of 2.5-3 storey dwellings will not be compatible with the visual sensitivity of the receiving landscape.

Subject to confirmation of this detail, I suggest the proposal is acceptable in landscape terms with the following conditions;

CONCURRENT WITH SUBMISSION OF FIRST RESERVED MATTERS: HARD AND SOFT LANDSCAPING MASTERPLAN

Before any development is commenced, and concurrent with the submission of the Reserved Matters application(s), A Landscaping Masterplan shall be submitted to and agreed by the local planning authority. The Landscape Masterplan shall to include;

- a) The layout and arrangement of soft landscaping, proposed range species of trees shrubs and other planting and seeding, to also include proposed planting and

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seeding of SuDs attenuation features and the location of any ecological mitigation and enhancement features.

- b) The layout and arrangement of hard landscaping, including outline information of the materials palette and design principles to be adopted and the lighting arrangements for the site as a whole.
- c) The agreed Landscape Masterplan shall form the basis of the detailed hard and soft landscaping scheme/s

CONCURRENT WITH RESERVED MATTERS: DESIGN CODE

Concurrent with the submission of the Reserved Matters application (s), a Design Code shall be submitted to the Local Planning Authority. The Design Code shall pertain to and include the following: architectural design and materials, the function and treatment of open spaces, street types and materials, parking, boundary treatments (including the details of screen walls and fences for individual dwellings), movement patterns (including connectivity to the offsite public rights of way network), lighting, security principles and domestic waste bin storage arrangements. Thereafter the development shall be carried out in accordance with the approved details.

CONCURRENT WITH RESERVED MATTERS: SOFT LANDSCAPING

No development shall commence within a development area or phase, until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for that development area/phase, drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities, weed control protection and maintenance and any tree works to be undertaken during the course of the development. This scheme shall also include the planting required to provide the necessary ecological mitigation and enhancement identified in the application. Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

CONCURRENT WITH RESERVED MATTERS: HARD LANDSCAPING

No development shall commence within a development area or phase, until full details of a hard landscaping scheme for that area/phase has been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (for example furniture, play areas and equipment, refuse and/or other storage units, signs, lighting and similar features); proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features).

CONCURRENT WITH RESERVED MATTERS: EXTERNAL LIGHTING

No external lighting shall be provided within a development area or phase unless details thereof have first been submitted to and approved in writing by the Local Planning Authority. Prior to commencement a detailed lighting scheme for areas to be lit shall be

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submitted to and approved in writing by the Local Planning Authority. The scheme shall show how and where external lighting will be installed, (through technical specifications and the provision of appropriate lighting contour plans which shall include lux levels of the lighting to be provided), so that it can be;

- a) Clearly demonstrated that areas to be lit have reasonably minimised light pollution, through the use of minimum levels of lighting and features such as full cut off cowls or LED.
- b) Clearly demonstrated that the boundary vegetation to be retained, as well as that to be planted, will not be lit in such a way as to disturb or prevent bats using their territory or having access to their breeding sites and resting places or foraging areas, through the use of minimum levels of lighting and features such as full cut off cowls or LED.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved scheme, and shall be 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.

PRIOR TO COMMENCEMENT: TREE PROTECTION

Any trees, shrubs and hedgerows within, or at the boundary of, the development area or phase, shall be protected in accordance with a scheme of tree protection, (BS5837:2012), to be agreed in writing with the Local Planning Authority prior to commencement. The Local Planning Authority shall be advised in writing that the protective measures/fencing within a development area/phase have been provided before any equipment, machinery or materials are brought onto the site for the purposes of development and shall continue to be so protected during the period of construction and until all equipment, machinery and surplus materials have been removed.

Within the fenced area no work shall take place; no materials shall be stored; no oil or other chemicals shall be stored or disposed of; no concrete, mortar or plaster shall be mixed; no fires shall be started; no service trenches shall be dug; no soil shall be removed or ground level changed at any time, without the prior written consent of the Local Planning Authority.

Reasons

I have made these recommendations in order to reasonably minimise the adverse impacts of the development on the character of the landscape and local visual amenity having particular regard for Policy CS5.

Yours sincerely

Phil Watson
Senior Landscape Officer



Consultation Response Pro forma

| | | | |
|----------|---|---|--------------------------|
| 1 | Application Number | 2797/16/OUT – Land to the South of Norton Road, Thurston | |
| 2 | Date of Response | 5 th October 2016 | |
| 3 | Responding Officer | Name: | Louise Barker |
| | | Job Title: | Housing Enabling Officer |
| | | Responding on behalf of... | Strategic Planning |
| 4 | Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | No objection. | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | <div style="border: 1px solid black; padding: 5px;"> <p>This is an outline development proposal for 175 residential dwellings and triggers an affordable housing provision requirement of 35% under altered policy H4 of the Mid Suffolk Local Plan (on development proposals of 5 units and over outside of Stowmarket and Needham Market) equating to 61 affordable housing units.</p> </div> <p>1. Housing Need Information:</p> <p>1.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2012, confirms a continuing need for housing across all tenures and a growing need for affordable housing.</p> <p>1.2 The 2012 SHMA indicates that in Mid Suffolk there is a need for 229 new affordable homes per annum. The Survey also confirmed that an appropriate affordable housing tenure split for the District is 75% rented and 25% low cost home ownership tenure accommodation.</p> | |

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.

| | | |
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| | | <p>1.3 Furthermore the 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are a key driver for this increased demand for smaller homes.</p> <p>1.4 With an aging population, both nationally and locally new homes should, wherever possible, be built to Lifetime-Homes standards and this can include houses, apartments and bungalows.</p> <p>1.5 The Suffolk Housing Needs Survey also confirms that there is strong demand for one and two bedroom flats/apartments and houses. Developers should consider flats/apartments that are well specified with good size rooms to encourage downsizing amongst older people, provided these are in the right location for easy access to facilities. There is also a demand for smaller terraced and semi-detached houses suitable for all age groups and with two or three bedrooms.</p> <p>1.6 Broadband and satellite facilities as part of the design for all tenures should be standard to support.</p> <p>1.7 All new properties need to have high levels of energy efficiency.</p> <p>1.8 Studio and bedsit style accommodation is not in high demand.</p> |
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| | <p>2. Choice Based Lettings Information:</p> <p>2.1 The Council's Choice Based Lettings system currently has circa 1003 applicants registered for housing in Mid Suffolk; at May 16, 25 applicants are registered as seeking accommodation in Thurston. This site is a S106 planning obligation site therefore affordable housing will be to meet district wide need hence the 1003 applicants registered is the figure to note.</p> <p>3. Recommended Affordable Housing Mix:</p> <p>3.1 It is noted that this application proposes 35% affordable housing which is welcomed. 35% affordable housing on this proposal based on 175 units equates to 61 AH units.</p> <p>3.2 The following mix is recommended:</p> <p>Affordable Rent Tenancy:</p> <ul style="list-style-type: none"> • 14 x 1b 2p flat = 50sqm • 8 x 1b 2p bungalow = 50sqm • 18 x 2b 4p house = 79sqm • 5 x 3b 6p house = 95sqm • 1 x 4b 7p house = 115sqm <p>Shared Ownership:</p> <ul style="list-style-type: none"> • 10 x 2b 4p house = 79sqm • 5 x 3b 5p house = 93sqm <p>(Recommended nationally described space standards.)</p> <p>4. Other requirements for affordable homes:</p> <ul style="list-style-type: none"> • Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards • The council is granted 100% nomination rights to all the affordable units in perpetuity |
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| | | <ul style="list-style-type: none"> • The Shared Ownership properties must have an 80% stair casing bar. • The Council will not support a bid for Homes & Communities Agency grant funding on the affordable homes delivered as part of an open market development. Therefore the affordable units on that part of the site must be delivered grant free • The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice • On larger sites the affordable housing should not be placed in groups of more than 15 units • Adequate parking provision is made for the affordable housing units • It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see www.midsuffolk.gov.uk under Housing and Affordable Housing for full details. • AH dwellings must be tenure blind. <p>5. Open Market Homes Mix:</p> <p>There is a strong need for homes more suited to the over 55 age bracket within the district and the supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities. Consideration should therefore be given to the inclusion of a number of bungalows/chalet bungalows to accommodate over 55's. It is recommended that smaller house units,</p> |
|--|--|---|

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| | | |
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| | | (majority 1 and 2 beds), 3 beds and a small element of 4 beds would provide a balanced mix of housing on this scheme. A small number of flats would also be recommended. |
| 6 | Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate | |
| 7 | Recommended conditions | |

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

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG



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

SENT AS AN E-MAIL

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

October 7th 2016

Dear Mr. Isbell,

Proposal: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments and vehicular access from Sandpit Lane and Norton Road

Location: Land to the South of Norton Road, Thurston

Application Number: 2797/16

The Parish Council writes further to the letter dated 12th August 2016 from Armstrong Rigg Planning on behalf of its client Hopkins Homes in response to the letter of objection from the Parish Council relating to the above planning application.

In its response, Hopkins Homes (via Armstrong Rigg Planning) make reference to a number of comments made by the Parish Council which for ease are repeated in bold with the Parish Council's response shown below:

"The site is in the countryside outside the settlement boundary and would result in dwellings that are visually, physically and functionally isolated from the facilities and services offered by Thurston."

The letter further states that:

"The Parish Council provides no acknowledgement that further housing allocations and the release of greenfield land will be necessary in Thurston (as the largest of the

Key Service Centres) in the context of District's shortfall in housing land supply and in order to contribute towards meeting local housing needs. No reference is made to the emerging Thurston Neighbourhood Plan which is in the process of assessing the suitability of greenfield sites adjoining the settlement boundary for development and that the site forms one of only three of the nineteen sites assessed to have scored positively in this respect"

The Parish Council's response is as follows:

1. The Parish Council, until the Order for the Neighbourhood Plan is laid, is only able 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) were taken into account 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.
2. The Thurston Neighbourhood Plan was acknowledged in its letter of 12th August; one might think that Armstrong Rigg Planning were attempting to discredit the Parish Council; however, 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. In fact the Neighbourhood Plan Team responded to this application via the Parish Council who fully endorsed the observations and comments made, and time was given to the Neighbourhood Plan Team at the Parish Council Planning Committee Meeting to address their concerns direct to the Parish Council, as witnessed by a representative of Armstrong Rigg Planning. As such the letter from the Parish Council supports that from the Neighbourhood Plan Team acknowledging that the issues raised in the site assessment are so major and fundamental as to override any acknowledgment of the site's "slightly positive" assessment as carried out under the Neighbourhood Plan Team's assessments of those sites submitted under the Parish Housing Land Availability Assessment.
3. The response from Armstrong Rigg Planning is selective in the points being addressed for example it makes no mention of the serious safety concerns associated with Norton Road, both pedestrians and vehicles as raised by the Neighbourhood Plan Team and the Parish Council in their responses. It further makes no acknowledgement that the natural route for travelling to and from the new development will be Sandpit Lane and the impact that this will have on the Thedwastre Road Priority Scheme over the railway bridge and the stop sign/line at the junction of Thurston Road (Pokeridge Corner).

"The proposal is an overdevelopment of the site, fails to address the wishes of the residents of Thurston for all new development to be no more than 50 dwellings and will not provide sufficient space between existing and proposed dwellings"

In response the Parish Council wishes to state:

1. The application covers 11 hectares but given the areas that are required for drainage and the areas set aside for Open Space, by far the majority of which are to the east of the development, the density of housing will be high in the remaining built up area.
2. The letter is factually incorrect and careless in its interpretation of the Neighbourhood Plan's Vision and Draft Objectives. Careful reading of the Neighbourhood Plan's Draft Objectives Document is clear about the wish for 50 dwellings or less in one area. It is

not related to the number of dwellings built at any one time. What the Neighbourhood Plan seeks is discreet areas of housing separated by open space, woodland or other amenity planting.

3. The letter speaks of 'retaining the character of the village'. Please see comments 1.c below as the Parish Councils refutes the contention that the proposed development will do this.

"The development fails to protect the intrinsic character of the countryside by the density and mix of properties proposed, will intrude into an area of undeveloped countryside and fails to ensure that it reflects the local character and identity of the surrounding area"

The Parish Council has the following comment to make:

1. The proposed development is not in conformity with current policies as written under Mid Suffolk's Local Plan and as evidenced in Thurston's emerging Neighbourhood Plan:

- a. There is mediocre, minimal attempt to produce a suitable boundary to the development adjacent to the countryside, for example either side of the access road from Norton Road to the proposed development has no planting whatsoever proposed leaving the rear gardens of the road to abut the proposed verge.

- b. The Parish Council stands by its original comment in its letter of 12th August 2016:

"It is felt that the development of 175 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 stands by its view, and the view of the Neighbourhood Plan Team as mentioned in its own response to this application, that even a limited number of 2.5/3 storey development is not a feature of the area immediately adjacent to the site and rather than adding "visual interest and aid legibility" the appearance of such dwellings will be an intrusion and will fail to complement the character of the existing area.

"The application fails to take into account the current road infrastructure and the lack of pedestrian and cycle routes leading from the site to the amenities and schools, fails to give priority to pedestrian and cycle movements, will not allow convenient integration of public transport, fails to demonstrate that it has considered safe and suitable access points and the traffic generated will add a further burden to the existing road network".

The Parish Council wishes to state:

1. In its response, Arrnstrong Rigg Planning conveniently omits in its argument the key issues of the unsuitability of the existing road network; for example its omission of the accident black spot of Fishwick Corner by focusing on the near neighbourhood of the proposed development is an indication of the selective,

- partisan nature of the proposal and response.
2. There remains no direct link to National Cycle Route 51, nor adequate pedestrian links to Thurston Community College. The application fails to address the issue of safe crossing points and walkways to the Community College or village services for those accessing the route along Norton Road. Suffolk Constabulary have also expressed reservations at the lack of regard for the speed of traffic on Norton Road and the capability of Sandpit Lane / Thedwastre Road Priority System and the inevitable increase in traffic volume.
 3. Further Suffolk Constabulary doubt the argument of the developer that Church Road is likely to be a preferred route and we would endorse their professional view.

"The development would put a negative strain on education capacity"

As a response the Parish Council would like to state:

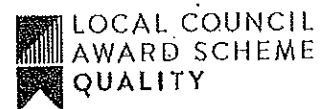
1. There remains no substantive plan for the building of a new Primary School indeed there is no real indication that the funding would be available to undertake this project.
Suffolk County Council have stated to the Thurston Neighbourhood Plan Team that:
"We currently forecast to have no surplus places at the catchment Primary School to accommodate children arising, but there is some capacity at the Community College. The Primary School site is landlocked and cannot be expanded and the Community College has the largest secondary catchment in the County and is unlikely that expansion would be supported in the future."
The Parish Council is concerned that the situation could be further exacerbated by the indication of the possible relocation of all post 16 students from the current Beyton Sixth Form Centre.
2. Armstrong Rigg Planning on behalf of Hopkins Homes mentions that Ixworth Free School is some 5 miles from the proposed development and has spare capacity. The Parish Council would be interested to know how this is compatible with the assertion that they will "help to promote more sustainable travel".

The Parish Council stands by its detailed observations in its objection letter of 12th August 2016 and would be delighted to speak with representatives of Mid Suffolk Planning Team on this matter.

Yours sincerely,

Victoria S Waples

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



Resource Management
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

Enquiries to: Kate Batt
Direct Line: 01284 741227
Email: kate.batt@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_2797
Date: 12th October, 2016

For the Attention of Lisa Evans

Dear Mr Isbell

**Planning Application 2797/16 – Land to the South of Norton Road, Thurston:
Archaeology**

Further to my previous advice (July 2016), SCCAS have now received the results of the geophysical survey undertaken on the site. Having reviewed the available evidence in light of this new information, the site possesses archaeological potential, but is unlikely to contain heritage assets of such extent or importance as to represent a significant constraint on the principal of development. Therefore in this instance, I am content that there is sufficient information to determine the proposed housing site as an Outline Application.

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following **two conditions** would be appropriate:

1. No development shall take place within each phase or part of site (as submitted under reserved matters) until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation, for that phase or part of site, which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording

- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied within each phase or part of site (as submitted under reserved matters) until the site investigation and post investigation assessment has been completed for that phase or part of site, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation for that phase or part of site approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation (5% sample by area) will be required to establish the potential of the site, before approval of layout and drainage under reserved matters, and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Kate Batt BSc (hons)

Senior Archaeological Officer
Conservation Team

From: Lisa Evans
Sent: 14 December 2016 14:51
To: BMSDC Planning Area Team Yellow
Subject: FW: Reconsultation on Planning Application 2797/16 Updated LVIA

Can this be logged as reconsultation on 2797/16 pls

From: Phil Watson
Sent: 14 October 2016 14:38
To: Lisa Evans
Subject: RE: Reconsultation on Planning Application 2797/16 Updated LVIA

Dear Lisa,

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Re-consultation on Planning Application 2797/16 Updated LVIA

I note the changes made by the applicant in the revised version of the LVIA to ensure that it assesses the proposal as set out on the revised drawing Thur 01/Rev A. On that basis I have no further comments on this matter in addition to those set out in my letter to you of the 04/10/16.

Best regards

Phillip Watson CEnv MIAgrE

Senior Landscape Officer
Natural & Historic Environment Team - Strategic Development
Resource Management
Suffolk County Council
8 Russell Rd Endeavour House (B2 F5 47)
IPSWICH IP1 2BX

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phil.watson@suffolk.gov.uk
www.suffolk.gov.uk
www.suffolklandscape.org.uk

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Your Ref: MS/2797/16
Our Ref: 570\CON\2461\16
Date: 27th October 2016
Highways Enquiries to: christopher.fish@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: planningadmin@babberghmidsuffolk.gov.uk

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

For the Attention of: Lisa Evans

Dear Lisa,

TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/2797/16

PROPOSAL: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road

LOCATION: Land To The South Of, Norton Road, Thurston, IP31 3QH

ROAD CLASS:

Notice is hereby given that the County Council as Highways Authority recommends that permission be refused for the following reasons:

The proposed access from Norton Road would not be safe for vehicles and an acceptable pedestrian footway cannot be constructed without narrowing Norton Road to the detriment of traffic flow such that safe pedestrian access cannot be achieved either. This is contrary to National Planning Policy Framework paragraph 32.

Comment:

NPPF paragraph 32 states: ... *Plans and decisions should take account of whether:*

- (1) 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;*
- (2) safe and suitable access to the site can be achieved for all people; and*
- (3) improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

Taking each point in turn:

- (1) Footway with pedestrian ramps are proposed giving access to Sandpit Road from which pedestrian access to the rest of Thurston may be gained. In addition, pedestrian access can be gained from Church Road via a public footpath. This route would give access to the primary school. If the above recommendation was different, it would also be recommended that a footway with street lighting be provided along Church Road to link to the footpath leading to the primary school and open space.

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP4 2BX

www.suffolk.gov.uk

Drawing IP15/127/11/SK04 shows the footway. Improvements to the surfacing of the footpath (Thurston Public Footpath 6) to make it useable all year should also be secured. This is directly relevant to the development, as children would not be expected to use this length of Church Road otherwise.

Access by cycle can be achieved on-carriageway; further off-carriageway improvements can be secured within the site.

Bus services run between stop on Sandpit Road on the site frontage to Bury St Edmunds and Stowmarket making this a potential alternative to using private motor cars. Appendix F of the Transport Assessment shows two stops suitably located with raised easy-access kerbs, hardstanding (northbound) and bus shelters. These improvements are necessary for the development and it is appropriate to secure them via a S106 planning obligation. In addition, further consideration should be given to localised widening of the carriageway (1/2 width layby on the west side) to facilitate the passing of buses. A pair of pedestrian ramps between the access and the stops to facilitate access the stops from the site should be provided.

Rail services (generally hourly) are accessible on foot from the site to major employment destinations and to the wider rail network. It was noted that the cycle storage provision at the station was limited.

(2) The application shows that visibility splays of 2.4m by 90m along Norton Road in each direction can be provided for the new access. It also identifies the location of the 30mph limit within the splays and that 'this will be relocated by the County Council'. The County Council has a speed limit policy but it is not possible to provide any assurance that a proposed revision to the 30mph speed limit east long Norton Road would be agreed, hence the objection to the application.

In addition, no drawings have been submitted showing that the provision of an adequate footway is feasible to directly serve the development from Norton Road. This situation is not, therefore, considered to be safe for all. It is not possible to recommend a condition that would address this.

Satisfactory access can be achieved, however, from Sandpit Road. Therefore, I could recommend conditions and S106 obligations if the access from Norton Road were to be removed from the proposal. Drawing IP15_12711SK002 Rev. A showing the site access and visibility splay from Sandpit Road is acceptable in principle.

The Suffolk Design Guide (para. 3.3.8) says, '*For major access roads serving more than 150 and up to 300 dwellings... (b) that where only one point of access is available the road layout should form a circuit and there should be the shortest practicable connection between this circuit and the point of access. This should always form the stem of a T-junction usually with a local distributor road.*'

Manual for Streets para. 6.7.3 notes that fire services assess the risk of obstruction of a single access and it is recommended that Suffolk Fire and Rescue are consulted on this possible amendment. Alternative internal layouts that would guard against such risk and allow for maintenance of the road are possible given the dimensions of the site.

(3) Manual for Streets recommends a minimum footway width of 2m, which is entirely reasonable. The length of footway that would be required on Norton Road would be approximately 130m. There is clearly insufficient verge on the south side to provide this footway without impinging significantly on the carriageway width. There is sufficient with on the north side except critically near the junction with Meadow Lane, where the verge is barely 1m adjacent to a ditch. It is also noted that pedestrians would need to cross twice in a relatively short length, which would lead more people to walk in the carriageway (especially if they're accessing the public house along that length). Along with the deficient visibility splays for vehicular access this would constitute a severe residual cumulative impacts in terms of road safety risks.

Given the increase in pedestrian use of the existing footway along Norton Road that this development would bring improvements for crossing Station Hill are warranted. It may be appropriate to establish home zones within the development, as encouraged by NPPF paragraph 35.

NPPF para. 36 says, 'A key tool to facilitate this [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.'

Travel Plan (comments based on the Interim Residential Travel Plan (IRTP) dated 21st June 2016).

The Travel Plan has identified a 10% modal shift target in favour of sustainable transport, which would be sufficient for a development of this size and location. However further work will be required to the Travel Plan content to ensure the 10% modal shift target can be achieved.

The IRTP includes some good baseline data that provides a breakdown by mode of travel to the most popular employment destinations, based on the existing residents that live within the Thurston area. The remainder of the Travel Plan, however, has not referred to this baseline data regarding the objectives, targets, and measures! For example, the measures to increase the uptake of sustainable travel are going to differ considerably from residents that commute locally to residents that commute to Bury St Edmunds, Stowmarket or Ipswich. Therefore, some active travel measures should be implemented for local commuters, and measures to promote public transport and car sharing for longer distance commuters. Also a multi-modal voucher to the value of two monthly rail season tickets to Bury St Edmunds, or bus tickets or cycle voucher of equivalent value should be offered to each dwelling to further incentivise sustainable travel.

There will need to be some content included regarding potential additional measures in the event the 10% modal shift is not achieved. Further examples of how the Travel Plan Coordinator will market the Travel Plan after the dwellings have been occupied will also must be included, as the welcome packs and website are unlikely to maintain resident interest without further intervention and engagement from the Travel Plan Coordinator. Other Residential Travel Plans have used 'fun days' and frequent resident newsletters to maintain the Travel Plan engagement post occupation.

The implementation of the Travel Plan will need to be revised to commence from occupation for a minimum period of five years, or one year after occupation of the final dwelling, whichever is longest. This is so that a reasonable average period of travel plan support is provided for the development. The annual monitoring of the Travel Plan must reflect this minimum implementation period as well. The implementation of the Travel Plan should also be summarised in an Action Plan, that details the times and responsibilities throughout the duration of the Travel Plan.

Finally, there will need to be further cross-referencing between the Travel Plan and the supporting Transport Assessment in accordance with the overarching principles of the 2014 Planning Practice guidance, as there is very little reference to the Travel Plan being part of the highway mitigation in the supporting Transport Assessment.

The applicant should be required to submit a revised travel plan that takes into account the comments raised above prior to the determination of this application.

The requirement for a Travel Plan complies with National Planning Policy Framework, notably paragraphs 32, 34, 35, 36 and 37. In addition, a good 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 fully secure the benefits of the travel plan the following Section 106 contributions and elements of the Travel Plan need to be secured:

- Travel Plan Evaluation and Support Contribution - £1,000 per annum 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 of the travel plan, which may result in the failure of the travel plan to mitigate the highway impact of this development.

- Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 per dwelling – based on the estimated cost 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.
- Approval and full implementation of the Interim Residential Travel Plan
- Provision of an approved welcome pack to each resident on first occupation
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- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

Other matters:

Full wording for the proposed Section 106 obligations and suitable conditions covering, amongst other matters, access layout, construction management strategy drainage, estate road provision, parking, and visibility splays, can be provided following revision of the application or in support of any subsequent appeal.

Concerns have been raised about the assessment of road safety impacts in the Transport Assessment. While no clusters are shown it is requested that full details are provided for inspection.

The illustrative masterplan suggests a tree lined avenue. The County Council's Highways Operations advice is that new tree provision in general should be in appropriate ground conditions in locations that have the potential for the trees to flourish whilst requiring the minimum amount of root protection/containment to prevent damage to highway and utility infrastructure. This would preferably be in non-highway locations (such as local amenity, landscaped areas). Tree locations must also accord with the Highways Act 1980; section 141 says, '*no tree or shrub shall be planted in a made-up carriageway, or within 15 feet [4.52m] from the centre of a made-up carriageway*'. Given this, trees in prospectively adoptable highways should be limited to wide verges away from all metalled highway surfaces or utility apparatus. In addition, street lighting should not be unduly compromised by trees and careful design is required to do so.

Yours sincerely,

Christopher Fish
Senior Highway Development Control Engineer
Strategic Development – Resource Management

<https://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Roads%20and%20Pavements/2015.07.23-Speed-Limit-Policy.pdf>

Your Ref: MS/2797/16
Our Ref: 570\CON\2461\16
Date: 27th October 2016
Highways Enquiries to: christopher.fish@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: planningadmin@babberghmidsuffolk.gov.uk

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

For the Attention of: Lisa Evans

Dear Lisa,

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/2797/16**

PROPOSAL: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road

LOCATION: Land To The South Of, Norton Road, Thurston, IP31 3QH

ROAD CLASS:

Notice is hereby given that the County Council as Highways Authority recommends that permission be refused for the following reasons:

The proposed access from Norton Road would not be safe for vehicles and an acceptable pedestrian footway cannot be constructed without narrowing Norton Road to the detriment of traffic flow such that safe pedestrian access cannot be achieved either. This is contrary to National Planning Policy Framework paragraph 32.

Comment:

NPPF paragraph 32 states: ... *Plans and decisions should take account of whether:*

- (1) 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;*
- (2) safe and suitable access to the site can be achieved for all people; and*
- (3) improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

Taking each point in turn:

- (1) Footway with pedestrian ramps are proposed giving access to Sandpit Road from which pedestrian access to the rest of Thurston may be gained. In addition, pedestrian access can be gained from Church Road via a public footpath. This route would give access to the primary school. If the above recommendation was different, it would also be recommended that a footway with street lighting be provided along Church Road to link to the footpath leading to the primary school and open space.

Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX

www.suffolk.gov.uk

Drawing IP15/127/11/SK04 shows the footway. Improvements to the surfacing of the footpath (Thurston Public Footpath 6) to make it useable all year should also be secured. This is directly relevant to the development, as children would not be expected to use this length of Church Road otherwise.

Access by cycle can be achieved on-carriageway; further off-carriageway improvements can be secured within the site.

Bus services run between stop on Sandpit Road on the site frontage to Bury St Edmunds and Stowmarket making this a potential alternative to using private motor cars. Appendix F of the Transport Assessment shows two stops suitably located with raised easy-access kerbs, hardstanding (northbound) and bus shelters. These improvements are necessary for the development and it is appropriate to secure them via a S106 planning obligation. In addition, further consideration should be given to localised widening of the carriageway (1/2 width layby on the west side) to facilitate the passing of buses. A pair of pedestrian ramps between the access and the stops to facilitate access the stops from the site should be provided.

Rail services (generally hourly) are accessible on foot from the site to major employment destinations and to the wider rail network. It was noted that the cycle storage provision at the station was limited.

(2) The application shows that visibility splays of 2.4m by 90m along Norton Road in each direction can be provided for the new access. It also identifies the location of the 30mph limit within the splays and that 'this will be relocated by the County Council'. The County Council has a speed limit policy¹ but it is not possible to provide any assurance that a proposed revision to the 30mph speed limit east long Norton Road would be agreed, hence the objection to the application.

In addition, no drawings have been submitted showing that the provision of an adequate footway is feasible to directly serve the development from Norton Road. This situation is not, therefore, considered to be safe for all. It is not possible to recommend a condition that would address this.

Satisfactory access can be achieved, however, from Sandpit Road. Therefore, I could recommend conditions and S106 obligations if the access from Norton Road were to be removed from the proposal. Drawing IP15_12711SK002 Rev. A showing the site access and visibility splay from Sandpit Road is acceptable in principle.

The Suffolk Design Guide (para. 3.3.8) says, '*For major access roads serving more than 150 and up to 300 dwellings... (b) that where only one point of access is available the road layout should form a circuit and there should be the shortest practicable connection between this circuit and the point of access. This should always form the stem of a T-junction usually with a local distributor road.*'

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Yours sincerely,

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Strategic Development – Resource Management

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Historic England

EAST OF ENGLAND OFFICE

Ms Lisa Evans
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582721

Our ref: P00519508

2 November 2016

Dear Ms Evans

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015

**LAND TO THE SOUTH OF NORTON ROAD, THURSTON IP31 3QH
Application No 2797/16**

We have received amended proposals for the above scheme.

Summary

This application proposes a large residential development on farmland at the northern edge of Thurston village. This land sits between the village and the grade II* listed Manor Farm House with the parish church of St Peter to the south east. An assessment of the significance of the house and the impact on it has now been submitted as required by the NPPF.

Historic England Advice

In our earlier advice we noted the importance of Manor Farm House, a grade II* listed building. The Heritage Statement submitted in support of the application has provided further helpful detail of the architectural significance of Manor Farm House. It has also established the link between the building and farming (paragraph 3.27) and that while the immediate grounds are quite enclosed (3.31) it stands in a predominantly agrarian landscape (3.28). The Statement correctly concludes that this landscape contributes to the significance of the listed building.

The Statement acknowledges that there is a 'minor degree of inter-visibility' between the house and this landscape, including the development site. In addition the site can be seen from the drive immediately in front of the house. The applicant's consultant has not accessed the house to see if views might be had from principle rooms and the balustraded deck on top of the roof may well have been designed to be accessed and the scene surveyed, including the application site.

We conclude that as the proposed development would bring modern building



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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



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significantly closer to the listed building and affecting the agricultural character of the landscape would diminish the way in which it contributes to the setting of Manor Farm House. Since the application was first submitted we have also had the opportunity to visit the site. As well as the intervisibility between Manor Farm House and the site we noted that the tower of the parish church of St Peter is more prominent in views from the north west across the application site than anticipated although planting around the existing dwellings between the two does reduce the visual impact.

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). The National Planning Policy Framework (NPPF) builds upon the 1990 Act. It identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings can be harmed by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favorably.

Having reviewed the proposals in light of the recently submitted assessment and visited the site we are of the view that the proposed development could result in a degree of harm to the significance of Manor Farm House and also the parish church of St Peter in terms of the NPPF paragraphs 132 and 134. Paragraph 134 asks planning authorities to weigh any public benefit delivered by developments against such harm. The proposed housing might deliver such a benefit and the Council should consider this when seeking the 'clear and convincing' justification for the harm required by the NPPF. We would note that the area to be left undeveloped in the north eastern corner of the application site could be beneficial to the setting of Manor Farm House and suggest that a similar landscaping belt along the whole northern edge of the site might also mitigate, but not wholly remove the harmful impact.

Recommendation

We consider that the proposed development in the vicinity of the grade II* listed Manor Farm House and the parish church of St Peter could result in harm to the significance of the historic buildings in terms of paragraph 132 of the NPPF. As required by paragraph 134 the Council should weigh any public benefit delivered by the development against such harm when seeking the 'clear and convincing' justification required by the NPPF. We would note that the area to be left undeveloped in the north eastern corner of the site could be beneficial to the setting of Manor Farm House is.



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Yours sincerely



David Eve

Inspector of Historic Buildings and Areas

E-mail: david.eve@HistoricEngland.org.uk

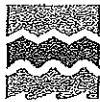


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From: Eve, David [mailto:David.Eve@HistoricEngland.org.uk]
Sent: 09 November 2016 20:29
To: Lisa Evans; Planning Admin
Subject: 11/08/2916 Land South of Norton Rd., Thurston (our ref. P519508)

Dear Ms Evans

Thank you for consulting us on the development plan framework and site location plan submitted in support of the above application. We have no comments to make on these and refer you to our letters dated 11th August and 3rd November this year.

Sincerely

David Eve



Historic England

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David Eve
Inspector of Historic and Buildings and Areas (Norfolk, Suffolk and Bedfordshire)
National Planning and Conservation Department
Tel: 012223 582721

Historic England | Brooklands | [24 Brooklands Avenue](#) | [Cambridge](#) | CB2 8BU.
www.historicengland.org.uk

From: Nathan Pittam
Sent: 09 November 2016 15:25
To: Planning Admin
Subject: 2797/16/OUT. EH - Land Contamination.

M3: 181652
2797/16/OUT. EH - Land Contamination.
Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space ...

Many thanks for your request for comments in relation to the revised plans for the above application. I can confirm that I have no objections to the proposed changes but would maintain my recommendation for the condition as outlined in my email of 8th August 2016 (see below).

Regards

Nathan

From: Nathan Pittam
Sent: 08 August 2016 11:59
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Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715 or 01473 826637
w: www.babergh.gov.uk www.midsuffolk.gov.uk

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From: Kate Batt
Sent: 10 November 2016 16:56
To: Lisa Evans; Planning Admin
Subject: RE: Reconsultation on Planning Application 2797/16

Dear Lisa,

The further information/revised plans recently submitted do not alter the archaeological implications of the proposed development. SCCAS advice, therefore, remains unchanged from that given on 12/10/16 (see attached). Please do not hesitate to contact me should you require further information or advice.

Kind regards, Kate

Kate Batt (BSc hons)
Senior Archaeology Officer

Suffolk County Council Archaeological Service,
Bury Resource Centre,
Hollow Road,
Bury St Edmunds,
IP32 7AY

Tel: 01284 741227
Mob: 07734478873

Website: <http://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/>
Heritage Explorer: <https://heritage.suffolk.gov.uk/>
Heritage Gateway: <http://www.heritagegateway.org.uk/Gateway/>

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 14 November 2016 09:52
To: Planning Admin
Subject: 2797/16 - Consultation Response

Application ref: 2797/16
Our ref: 200992

Dear Sir/Madam,

Natural England has no comments to make on this application.

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.

Yours faithfully,

Jamie Clarkson
Consultations
Natural England
Hornbeam House, Electra Way
Crewe Business Park
Crewe, Cheshire CW1 6GJ

Your ref: 2797/16
Our ref: 00045522
Date: 14 November 2016
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Lisa Evans
Planning Department
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

Dear Lisa,

Re: Thurston, land south of Norton Road

I refer to the planning application reconsultation for the above scheme in Mid Suffolk. Suffolk County Council has previously provided a consultation response by way of letter dated 16 August 2016 and the contribution requirements are still valid.

I have copied colleagues from SCC Floods team, Highway Network Management and Archaeology into this letter who will contact you separately with any further responses.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC
RM Floods Team, SCC
Rachael Abraham, SCC
Christopher Fish, SCC

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Lisa Evans, Development Control Team

FROM: Joanna Hart, Environmental Protection Team

DATE: 17.11.2016

YOUR REF: 2797/16/OUT

SUBJECT: Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road.

Please find below my comments regarding 'Environmental Health - Other issues' only.

Thank you for your re-consultation on the above application.

My comments submitted in my memo of 12th August 2016 are still relevant.

I note that the development framework plan identifies an 'informal kickabout area' in the centre of the site. I do have some concerns about the siting of this area which could lead to the potential for loss of amenity due to noise at nearby properties. If it is not possible to relocate this area, I would suggest that it will require careful design in terms of any features/equipment provided (such as goals) and lighting.

Kind regards
Joanna Hart
Senior Environmental Protection Officer



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 MS/2797/16

SITE: 175 New Homes for Land to the south of Norton Road, Thurston, IP31 3QH

Applicant:

Planning Officer: Ms Lisa Evans

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.

Dear Ms Lisa Evans

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of 175 residential properties at land to the south of Norton road, Thurston, IP31 3QH.

At present I believe I do not have enough information to fully comment on this proposal. However, I wish to highlight in its current form, I have serious concerns that the outlined application is too permeable and could lead to a higher generation of crime within the area.

Permeability is often seen as positive feature within a development but can make controlling crime very difficult, as it allows easy intrusion by potential offenders and although well used routes can provide welcome opportunity for informal surveillance, this is not so at all times of the day and night.

As a result, I ask the planners to rethink the amount of footpaths and cycle routes that would, if implemented, leave the area too open for an Offender to use.

One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19 under Local Development Framework and Community Strategy states:

A safe community: Protect the environment from pollution, flooding and other natural and man-made disasters; reduce the level of crime; discourage re-offending; overcome the fear of crime; and provide a safe and secure environment.

Section 17 outlines the responsibilities placed on local authorities to prevent crime and dis-order,

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.

NOT PROTECTIVELY MARKED
RESTRICTED/CONFIDENTIAL

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

An early input at the detailed 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.

- 1.1 vehicular and pedestrian routes should be designed to ensure that they are visually open, direct, well used and should not undermine the defensible space of neighbourhoods. Design features can help to identify the acceptable routes through a development thereby encouraging their use and in doing so enhance the feeling of safety.
- 1.2 There are advantages in some road layout patterns over others, especially where the pattern frustrates the searching behaviour of the criminal and his need to escape. Whilst it is accepted that through routes will be included in developments such as this, the designers must ensure that the security of the development is not compromised by excessive permeability, for instance allowing an offender legitimate criminal access to the rear or side boundaries of a dwelling.
- 1.3 Developments that enhance the passive surveillance of the area by the residents from their homes and which incorporate high levels of street activity have both been proven to influence a criminal's behaviour and deflect them elsewhere.
- 1.4 To the planners credit the proposed plan caters for the majority of properties to look onto one another as preferred by police Secure By Design principles. It is important that the boundary between public and private areas is clearly indicated. Each building needs two faces: a front onto public space for the most public activities and a back where the most private activities take place. If this principle is applied consistently, streets will be overlooked by building fronts improving community interaction and offering surveillance that creates a safer feeling for residents and passers-by.

2. General layout of the proposed plan

- 2.1 For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1 metre) and railings or timber picket fence.
- 2.2 I would also like to see that properties will have gable end windows that look onto public spaces, which is a police preferred preference of design that allows natural surveillance of the area to reduce the risk of graffiti, other forms of criminal damage, or inappropriate loitering. Where blank gable walls are unavoidable there should be a buffer zone, using either a 1.2 – 1.4m railing (with an access gate) or a 1m mature height hedge with high thorn content.
- 2.3 I would be interested to know how the rear gardens will be secured. I would refer the developers to SBD 2016, page 18 on "Dwelling Boundaries", which outlines the importance of how the boundary between public and private areas should be clearly indicated. I would

also prefer to obtain more details on how the boundary of the new properties will interface with the current homes on Sand Pit Lane, Sand Pit Drive, Victoria Close and Oakey Field Road.

2.4 There are five main reasons for providing a perimeter boundary fence:

- a) To mark a boundary to make it obvious what is private and public property.
- b) Provide safety for employers and employees.
- c) Prevent casual intrusion by trespassers.
- d) Prevent casual intrusion onto the site by criminals.
- e) Reduce the wholesale removal of property from the site by thieves.

2.5 The gates to the side or rear of dwellings that provide access to rear gardens, should be of robust construction and be the same height of the fence line at a minimum height of 1.8m and be capable of being locked (operable by key from both sides of the gate and a good quality mortise lock is preferred). SBD 2016, Pages 18-19, Paras 10.3 – 10.5.12 refers.

3.0 Footpaths

3.1 The balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars. We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community. There is no blanket approach, site specifics apply, based on the crime rate and local context. Research from across the United Kingdom shows that 85% of house burglaries occur at the rear of a property.

3.2 Routes for pedestrians, cyclists and vehicles should be integrated to provide a network of supervised areas to reduce crime along with Anti-Social Behaviour. Where a suggested footpath is unavoidable, such as along a right of way, designers should consider making the footpath a focus of the development and ensure that they are straight as possible, preferably at least 3m across to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles with low growing and regularly maintained vegetation on either side. If possible it would assist for that area to also be well lit. (SBD 2016, pages 14-17, at Paras 8.1-8.19).

3.3 Footpaths that include lighting should be lit to relevant levels as defined by BS 5489:2013. I have serious concerns that if the current footpath, which is to be retained and made an integral part of the boundary of the development is not properly lit, this route will become a generator for crime to occur.

4. Lighting

4.1 I cannot comment on the lighting as there are no details submitted on the plans. However, I would recommend photocell operated wall mounted lighting at the front of all household dwellings; (on a dusk to dawn light timer) complete with a compact fluorescent lamp and wired through a switched spur to allow for manual override. I would also appreciate viewing a "Lux" lighting plan of the proposed site.

4.2 Lighting should conform to the requirements of BS 5489:2013. A luminaire that produces a white light source (Ra>59 on the colour rendering index) should be specified but luminaires that exceed 80 on the colour rendering index are preferred.

5. Car Parking

- 5.1 The layout of the plans allows natural surveillance of the parking areas, which is commendable.
- 5.2 Communal parking facilities must be lit to the relevant levels as recommended by BS5489:2013 and a certificate of compliance provided. See section 16 SBD Homes 2016 for the specific lighting requirements as well as recommendations for communal parking areas.

6. Communal Areas/ Public Open Space

- 6.1 **Communal Areas/Public Open Space:** I note that provision has been looked at to provide at least two "Public Open Space areas", allotments, a proposed football pitch area and a Gym Trail. I would recommend metal knee-rail hoop fencing for the perimeter of each communal recreation area. Section 9, SBD 2016, provides further details around Communal areas in order to reduce the potential for ASB and Criminal Damage issues.
- 6.2 Play equipment 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.
- 6.3 Gymnasium/fitness equipment needs to be properly spaced 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.
- 6.4 **Gates:** As a general principle these should take 4-8 seconds to close from a 90 degree opening position. To prevent animal access they should be outward opening.
- 6.5 **Fences:** Should pass the entrapment requirements, i.e. less than 89mm between vertical palings, no horizontal access and hoop tops should pass the head and neck probe.
- 6.6 **Seats:** These should be placed at least 300mm from the fence to prevent potential entrapment between the bench and the fence.
- 6.7 **Pathways:** Erosion resisting pathways should be provided into the site at least to the seating areas.
- 6.8 **All litter bins should be of a fire retardant material.**
- 6.9 The Fields Trust Planning and Design for Outdoor Sport and Play Introduced 2008 and The Association of Play Industries Adult Outdoor fitness Equipment Standards also offer further guidance.

7. Further Recommendations in General

- 7.1 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.
- 7.2 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).
- 7.3 I note the area and boundary will be landscaped and I would be interested to note the full

details for such landscaping. I strongly recommend around the boundary areas, planting defensive vegetation, such as Hawthorn, Berberis or Pyrocantha to deter any would be offenders and that the height of such boundaries should be at least 1.8m high.

8. Conclusion

- 8.1 I strongly advise the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development.
- 8.2 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
- 8.3 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/>
- 8.4 **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:
- 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.
 - All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (Internal specification).
 - 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.
- 8.5 It is now widely accepted a key strand in the design of a 'sustainable' development is its resistance to crime and anti-social behaviour by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of that development.

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.

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.

The applicant can also enter into a **pre-build agreement** and make use of the Award in any marketing or promotion of the development. The current "New Homes 2016" guide and application

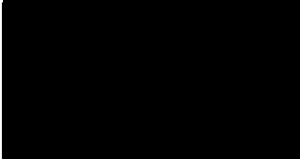
forms are available from www.securedbydesign.com which explains all the crime reduction elements of the scheme.

In conclusion I would encourage designers to look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that any would be offender will stand out in a well-designed community. I am happy to assist with this as the detailed design progresses.

In regard to a play area consideration should be given regarding usage by non-age appropriate people, (i.e. older children) for which the play area would not be designed. Teenage youths will always gather somewhere, often it is in a play park as it is considered an out of the way area away from parents. The best way to address such problems is to find alternative areas for such groups. One tried and tested method is providing a youth shelter.

If you 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: RM PROW Planning
Sent: 22 November 2016 12:58
To: Planning Admin
Subject: RE: Reconsultation on Planning Application 2797/16

For The Attention of: Lisa Evans

Public Rights of Way Response

Thank you for the additional correspondence in relation to the above planning application.

Please accept this email as confirmation that we have no further comment to make in addition to our original response dated 9/8/16.

Regards

Jackie Gillis
Rights of Way Support Officer
Countryside Access Development Team
Rights of Way and Access
Resource Management, Suffolk County Council
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

[✉ PROWPlanning@suffolk.gov.uk](mailto:PROWPlanning@suffolk.gov.uk) | [🌐 http://publicrightsofway.onesuffolk.net/](http://publicrightsofway.onesuffolk.net/) | **Report A Public Right of Way Problem Here**

For great ideas on visiting Suffolk's countryside visit www.discoverysuffolk.org.uk



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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: 2797/16

Referring to the planning application referenced above, dated 10 November 2016, application for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments and vehicular access from Sandpit Lane and Norton Road, Land to the South of Norton Road Thurston IP31 3QH, 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.¹

¹ Where relevant, further information will be provided within Annex A.

Signature: 

Date: 25 November 2016

Name: David Abbott

Position: Asset Manager

Highways England:
Woodlands, Manton Lane
Bedford MK41 7LW

david.abbott@highwaysengland.co.uk

NEIGHBOURHOOD PLAN TEAM

Parish Council Office
New Green Centre
New Green Avenue
Thurston
Suffolk
IP31 3TG
Tel: 01359 232854
e-mail: thurstonnpsg@hotmail.com



Councillor P Robinson
Chair of Thurston Planning Committee
Thurston Parish Council
New Green Centre
Thurston
IP31 3TG

22nd November 2016

Dear Cllr. Robinson,

Re: Re-consultation on the Outline Planning Application – 2797/16 – (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments and vehicular access from Sandpit Lane and Norton Road @ land to the South of Norton Road, Thurston.

Thank you for allowing the Neighbourhood Plan Team to comment further on the re-consultation of the above planning application as submitted by the agents acting on behalf of Hopkins Homes. The Neighbourhood Plan Team would like to stand by its concerns as mentioned in its letter of 9th August 2016 and for ease have repeated the relevant points below:

- The Neighbourhood Plan Team would like to state that in accordance with the Parish Council Protocol's for Pre Planning Application Developments – no comments on the suitability of the site for development or how the site performs in relation to others ahead of the site assessment work were made during the attendance of representatives from either Hopkins Homes or their agents at Neighbourhood Plan Meetings and that whilst the applicant had been informed that it could state that they have met with the Neighbourhood Plan Steering Group they could not in any forthcoming developer public meetings state that their proposals have in any way, shape or form, been endorsed by the Neighbourhood Planning Steering Group.
- Thurston Parish Council is at a relatively advanced stage in preparing a Neighbourhood Plan and whilst the plan has not yet reached the stage of allocating sites or proposing policies, following consultation with the public and land owners and agents on the site assessments carried out during Summer 2016 it should be afforded some weight in responding to this application. The results of the assessment on land submitted by the agent on behalf of Hopkins Homes under the Neighbourhood Plan Team's Call for Sites of January 2016, under the Parish Housing Land Availability Assessment, has raised a number of issues which the Neighbourhood Plan Team feel are so major and fundamental as to override any acknowledgment of the site's "slightly positive" assessment. Comments raised by the public and the agent following the public consultation on the site assessments have also been incorporated into the process and the revised site assessment overall summary has not changed from that of slightly positive. A copy of this site assessment is attached to this letter.

The Neighbourhood Plan Team has continually consulted with the residents and businesses of Thurston over the past two years and feels that it has followed a clear programme of consultative events which places it in a strong position to be able to reflect the local community and to respond to planning applications that are premature and fail to follow the Neighbourhood Plan Process.

- The Neighbourhood Plan Team would like to state that it is disappointed at the speed at which this and another application have been submitted for new housing in the village. There seems to be a general haste to ensure that each development is the first to submit with little regard for the cumulative impact that each development will have as a whole on the general infrastructure of Thurston which requires

time to evolve and time to absorb new residents and associated growth. There is a general concern that the size of new developments being proposed will result in Thurston losing its 'village feel' and for it to become 'a small town'.

With particular reference to the planning application submitted:

- Generally the Neighbourhood Plan Team feels that the Concept Masterplan is an unimaginative off the shelf design and that it fails to show any respect for the fact that it abuts countryside on one side and an existing housing development on the other. It was felt that the masterplan was more in-keeping with an urban edge of town design than that which would reflect the rural state of Thurston as a village. The Neighbourhood Team is also concerned at the proposal of 2.5 - 3 storey dwellings which are considered not to be in-keeping with the general characteristic of a rural village. The Neighbourhood Plan Team felt that there was also a need for better screening around the edge of the site, along the existing roads in order to ensure that the new development enhanced and protected the existing natural environment, wildlife networks and biodiversity.

Whilst the response from the community engagement process carried out by Engage Planning on behalf of Hopkins Homes reflects the Neighbourhood Plan's findings that the majority of those who have responded to the public consultations wished to see starter homes for local first time buyers; bungalows and 1 - 2 bedroom houses, this is not reflected in the indicative housing size within the Concept Masterplan in the outline planning application submitted. The implication is that size is still to be determined but the Neighbourhood Plan Team would have expected the outline application to have followed the applicant's consultative results.

The Neighbourhood Plan Team is disappointed that within the Concept Masterplan there is little evidence to show that the scheme is set to encourage the development of appropriate housing stock that reflects the needs of current and future residents.

- The Neighbourhood Plan Team would like to reiterate that, whilst it is generally appreciated within the village that as a Key Service Centre and a village on the A14 corridor with a good rail link there will be growth within the village, there is a preference for this growth to be handled sympathetically and on sites of no more than 50 houses. The Neighbourhood Plan Team would have liked to see the Concept Masterplan draw on this preference and to have divided the site into three separate areas using hard and soft landscaping techniques to ensure that the design preserves and enhances the built, natural and historic environment of the local area as well as maintaining and enhancing its distinctive characteristics.
- Within the Interim Residential Travel Plan mention is made of the access to local facilities either via pedestrian access, cycle access, bus services or rail services.

The Neighbourhood Plan Team feels that given the location of the site little reference has been made to the current road infrastructure and the impact that the development will have on the junction of Norton Road and Ixworth Road and Fishwick and Pokeridge Corners for those accessing the A14. The route to the latter is via the single file pinch point at the bridge on Sandpit Lane - Thedwastre Road and then onto the dangerous Pokeridge corner junction. The increase of vehicular movements onto the single exit Sandpit Lane will also impact negatively on this pinch point where there is no pedestrian footpath across the bridge. It is still noted that the crash map produced does not include Fishwick Corner which has a higher proportion of incidences than other areas quoted.

The Neighbourhood Plan Team would respectively draw your attention to its comments above and to the concerns raised by Suffolk Constabulary at the capability of Sandpit Lane / Thedwastre Road Priority System and the inevitable increase in traffic volume from this development onto Sandpit Lane.

It was further agreed that the Neighbourhood Plan Team was concerned that there were no plans to install safe pedestrian footpaths on the development side of Sandpit Lane. The plans indicate that the single entrance road to the development will come straight out onto Sandpit Lane with no pedestrian footpath. The route into the village along Sandpit Lane could be made reasonably safe by providing a short pedestrian footpath and a pedestrian crossing to the other side of the road which would then link to the existing footpath to shops or amenities on the opposite side of the road. Also no reference has been made to the fact that all pavements within and to the development should be made suitable for motorised buggies nor was there any mention of cycle lane provision. The Neighbourhood Plan Team feels that the applicant should consider linking the development with the Sustrans National Route to ensure that there are linked routes for cyclist safety.

There is however a genuine concern at the adverse impact at peak times that the one single entrance onto Sandpit Lane will have on pedestrian and vehicular movements. The Neighbourhood Plan Team

would like to see, as a minimum, this entrance point replicate the splay that was originally proposed for the entrance onto Norton Road thereby allowing safe passage for both pedestrians and vehicles.

The Neighbourhood Plan Team would like to see a comprehensive travel plan which assesses the impact of such a development on the whole road network in Thurston including pedestrian and cycles routes to allow informed opinions to be made.

The Neighbourhood Plan Team was also concerned that whilst it is stated (within the planning overview submission document) that additional residents would also support the sustainability of established bus and rail services, there still needs to be an overall assessment of the impact on the railway station that this and other developments will have on the station/rail network and the fact that car parking is already an issue.

- The Neighbourhood Plan Team would further like to draw to the Parish Council's attention to the impact that such a development will have on the education provision within Thurston. The Team has been informed by Suffolk County Council that Thurston Church of England Primary Academy is currently at capacity (this takes into account current housing commitments only) and that the consequence that any future growth will have must include detailed discussions about infrastructure mitigation. It is also noted that Thurston Community College is also at capacity and that it is unlikely that the school will be supported to grow much bigger than it is now. Given that 200 additional homes by 2031 will yield 50 Primary Pupil Places; 36 Secondary Pupil Places and 8 Secondary 16+ Places, the Neighbourhood Plan Team has concerns that this provision will not be met locally and that there will be a need for pupils to be 'bussed' outside of the village. This unsustainable situation will also have a further negative impact on traffic, bus stops and road congestion within the village.

Armstrong Rigg Planning on behalf of Hopkins Homes has also mentioned in a later submission that Ixworth Free School is some 5 miles from the proposed development and has spare capacity. The Neighbourhood Plan Team would be interested to know how this is compatible with the assertion that this "helps to promote more sustainable travel". As this relates to the provision of education for those above 11+, the Neighbourhood Plan feels that further consideration should be given to the provision of education for those of primary school age.

Overall the Neighbourhood Plan Team would ask the Parish Council to take into account its concerns for this application on this site for the following reasons:

- road safety with particular emphasis on the junctions of Norton Road and Ixworth Road
- road safety issues with particular emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pokeridge Corner
- pedestrian safety along Sandpit Lane for accessing village facilities as there are no safe crossing points
- impact of the vehicular movements from a single point of entry
- loss of character of the village
- development inappropriate to that of land abutting the countryside
- concern for the amount of development on the site
- village infrastructure particularly education provision and traffic
- type and density of housing mix
- cost of affordable homes for local residents

In summary, whilst the Neighbourhood Plan Team recognises the need for future development to take place within Thurston, it still does not support the re-submission in its present guise for the concerns outlined above.

Yours faithfully,

Victoria S Waples

Victoria S Waples, BA (Hons), CILCA
Secretary to Thurston Neighbourhood Plan Team

Copy to:
Corporate Manager – Development Management
MSDC
131 High Street
Needham Market
Suffolk
IP6 8DL

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

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



SENT AS AN E-MAIL

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

November 25th 2016

Dear Mr. Isbell,

Proposal: Re-consultation on the Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments and vehicular access from Sandpit Lane and Norton Road

Location: Land to the South of Norton Road, Thurston

Application Number: 2797/16

The Parish Council wishes to place on record that it objects to the revised plans as submitted under planning application 2797/16 for the following reasons, the majority of which were submitted in its letter dated 12th August 2016 but are repeated below for ease:

The Parish Council, until the Order for the Neighbourhood Plan is laid, 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 taken into account 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.

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 Meeting held to discuss this application as well as those 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. The Parish Council has received correspondence from the Neighbourhood Plan Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that they are to be included within its submission. As such a copy of that letter should be read in conjunction with this response.

Reasons for objection:

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 also of the view that even a limited number of 2.5/3 storey development is not a feature of the area immediately adjacent to the site and rather than adding "visual interest and aid legibility" the appearance of such dwellings will be an intrusion and will fail to complement the character of the existing area.

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 175 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.

3. The Parish Council considers that the application 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 still remains no direct link to National Cycle Route 51, nor adequate pedestrian crossing points at the junction of Norton Road and Ixworth Road for those wishing to access Thurston Community College and the Library. Given the one entrance the application also fails to address the issue of safe crossing points and access out of the development direct onto Sandpit Lane.

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 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). The revised plans make no acknowledgement that the natural route for travelling to and from the new development to the A14 will be down Sandpit Lane onto the narrow Thedwastre Road Priority Scheme over the railway bridge and the stop sign/line at the junction of Thurston Road (Pokeridge Corner). The Parish Council is concerned at the impact that this will have on this junction and is also mindful that Suffolk Constabulary have also expressed reservations at the capability of Sandpit Lane / Thedwastre Road Priority System and the inevitable increase in traffic volume.

Furthermore, the Parish Council raises concerns that there is no provision of pedestrian access from the development to the remainder of the footways within Thurston and concern has been raised that a number of residents will access the Primary School via Sandpit Lane. The Parish Council endorses the recommendation made by Suffolk County Council that pedestrian ramps are proposed to give access to Sandpit Road from which pedestrian access to the rest of Thurston may be gained. If further agrees that whilst a pedestrian access can be gained from Church Road via a public footpath which would give access to the primary school, the route along Church Road, should be lit with street lighting to link to the footpath leading to the primary school and open space.

4. The Parish Council has concerns over the single access now being proposed from Sandpit Lane. 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 ambulances and finally other motor vehicles. The Parish Council concurs with the concerns raised by the Neighbourhood Plan Team over the plans to have a single entrance road to/from the development directly onto Sandpit Lane 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 and entry and exit points onto the A14.

Whilst the Parish Council acknowledges that there are bus stops located along Sandpit Lane and the Interim Residential Travel Plan supplied by the applicant shows that there will be improvements to bus stops in Sandpit Lane to enhance the public transport experience (6.2.10), there is a concern that there is currently little capability of Sandpit Lane to have sufficient width to allow the passing of buses and that this will further exacerbate issues with the flow of traffic in both directions. The Parish Council would like to see localised widening at points along Sandpit Lane to accommodate this.

6. The Parish Council would also like to recommend that Suffolk County Council be involved in the discussion of future growth in Thurston with reference to the impact that this will have on the provision of education. As mentioned within the letter from Thurston's Neighbourhood Plan Team, both the Thurston Primary Academy School and Thurston Community College are at capacity (taking into account existing planning approvals) and as such this application will ensure that the educational infrastructure is unlikely to meet the demand placed on it by 175 dwellings. The Parish Council is aware that the application is for phased development but feels that from the outset the total provision should be understood and capacity explored. As such the Parish Council feels that this application will put a negative strain on the existing infrastructure and as such would be contrary to Policy CS6 of the Core Strategy.

The Parish Council would also like to reiterate the concerns of the Thurston Neighbourhood Plan Team with regards to the speed at which this and potentially other applications have been/are in the process of being submitted for new housing in the village. It is recognised within the village that as a Key Service Centre the village of Thurston will appeal to developers and that a certain amount of growth is desirable and non-objectionable, however the Parish Council is concerned that piecemeal development will have a negative impact on the current infrastructure and that there should be a strict control over new housing proposals and the associated numbers until the general infrastructure of Thurston and the surrounding areas has been given time to absorb new residents and the impacts that this associated growth will have on a rural village.

Yours sincerely,

Victoria S Waples

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



From: Jason Skilton
Sent: 28 November 2016 10:08
To: Planning Admin
Cc: Kathryn Oelman
Subject: 2016-11-28 JS reply Land to the South of Norton Road, Thurston IP31 3QH Ref 2797/16

Suffolk County Council, Flood and Water Management can recommend the approval, subject to the following condition relation to surface water drainage being applied.

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA its addendum (Ref IP15_127_11 May 2016 & Nov 2016) and includes:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
 - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
 - f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;

The scheme shall be fully implemented as approved.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.

2. Concurrent with the first reserved matters application(s) details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

3. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register

4. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment is subject to payment of a surface water developer contribution

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

Your ref: 2797/16
Our ref: 00045522
Date: 02 December 2016
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Lisa Evans
Planning Department
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

Dear Lisa,

Re: Thurston, land south of Norton Road

I refer to the application for planning permission for the above scheme in Mid Suffolk. Suffolk County Council has previously provided consultation responses by way of letters dated 16 August 2016 and 14 November 2016.

New information has come to light that requires further consideration on highway and education impacts. I would be grateful if the District Council hold off from determining the application until consideration has been given to these matters by SCC.

Notwithstanding this consideration, it would be beneficial if the District Council can provide the applicant's observations to the education S106 contribution approach set out in my letter on 16th August 2016.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC
Iain Maxwell – SCC
Christopher Fish - SCC

From: Phil Watson
Sent: 09 November 2016 14:54
To: Lisa Evans
Subject: RE: Reconsultation on Planning Application 2797/16 Updated access information and Framework Drawing

Dear Lisa,

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Re-consultation on Planning Application 2797/16 Updated access information and Framework Drawing

I note the changes made by the applicant as set out in Thur 01/Rev C in order to respond to issues identified by Historic England in their letter of 2/11/16. On that basis I have no further comments on this matter in addition to those set out in my letter to you of the 04/10/16 as the details of the revised planting proposal can be finalised in the conditions I have already set out. However the applicant will need to be mindful of the space requirement to make the indicated planting effective and the need to ensure that a long term management scheme is in place so that the plantings can fulfil their mitigation function.

Best regards

Philip Watson CEnv MIAgrE

Senior Landscape Officer
Natural & Historic Environment Team - Strategic Development
Resource Management
Suffolk County Council
8 Russell Rd Endeavour House (B2 F5 47)
IPSWICH IP1 2BX

Tel: 01473 264777
Mob: 07872 676856
phil.watson@suffolk.gov.uk
www.suffolk.gov.uk
www.suffolklandscape.org.uk

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Jacqueline Pannifer

From: RM PROW Planning
Sent: 09 August 2016 14:08
To: Planning Admin
Cc: geoff.armstrong@arplanning.co.uk; Sam Bye
Subject: RE: Consultation on Planning Application 2797/16
Attachments: 279716 Land to the south of Norton Road - FP6 - map.pdf; 279716 Land to the south of Norton Road - FP6 - map.pdf

Our Ref: W523/006/ROW478/16

For The Attention of: Lisa Evans

Public Rights of Way Response

Thank you for your consultation concerning the above application.

This response deals only with the onsite protection of affected PROW, and does not prejudice any further response from Rights of Way and Access. As a result of anticipated increased use of the public rights of way in the vicinity of the development, SCC may be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Thurston Public Footpath 6 is recorded through the proposed development area.

We have no objection to these proposals.

Please include as footnotes in the decision notice:

Informative Notes:

Please note that the granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way.

Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. In order to avoid delays with the application this should be considered at an early opportunity.

The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team.

Nothing in this decision notice shall be taken as granting consent for alterations to Public Rights of Way without the due legal process being followed. Details of the process can be obtained from the Rights of Way & Access Team.

"Public Rights of Way Planning Application Response - Applicant Responsibility" and a digital plot showing the definitive alignment of the route as near as can be ascertained; which is for information only and is not to be scaled from, is attached

Regards

Jackie Gillis
Green Access Officer
Access Development Team
Rights of Way and Access
Resource Management, Suffolk County Council
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

🌐 <http://publicrightsofway.onesuffolk.net/> | [Report A Public Right of Way Problem Here](#)

For great ideas on visiting Suffolk's countryside visit www.discoveruffolk.org.uk

From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]
Sent: 22 July 2016 15:11
To: RM PROW Planning
Subject: Consultation on Planning Application 2797/16

Correspondence from MSDC Planning Services.

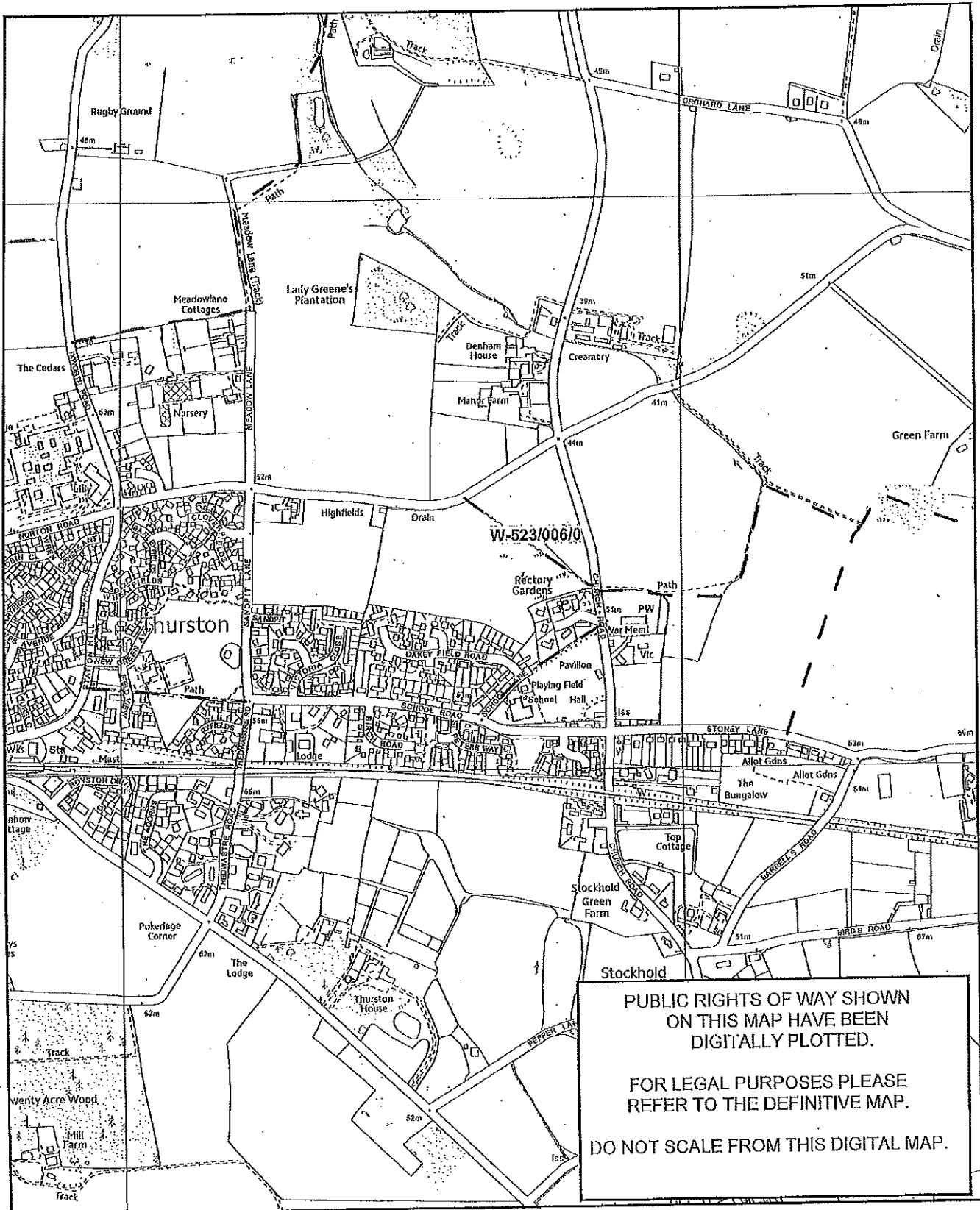
Location: Land to the South of Norton Road, Thurston IP31 3QH

Proposal: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us within 21 days. Please make these online when viewing the application.

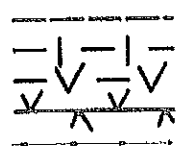
The planning policies that appear to be relevant to this case are GP1, NPPF, CSFR-FC1, H17, HB13, RT12, CL8, CSFR-FC1.1, SB3, Cpr1, Cor2, Cor5, Cor6, Cor9, CSFR-FC2, T9, T10, HB1, which can be found in detail in the Mid Suffolk Local Plan.



2797/16 Land to the south of Norton Road, Thurston
Public Footpath 6



Resource Management
 Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX



Ordnance Survey MasterMap

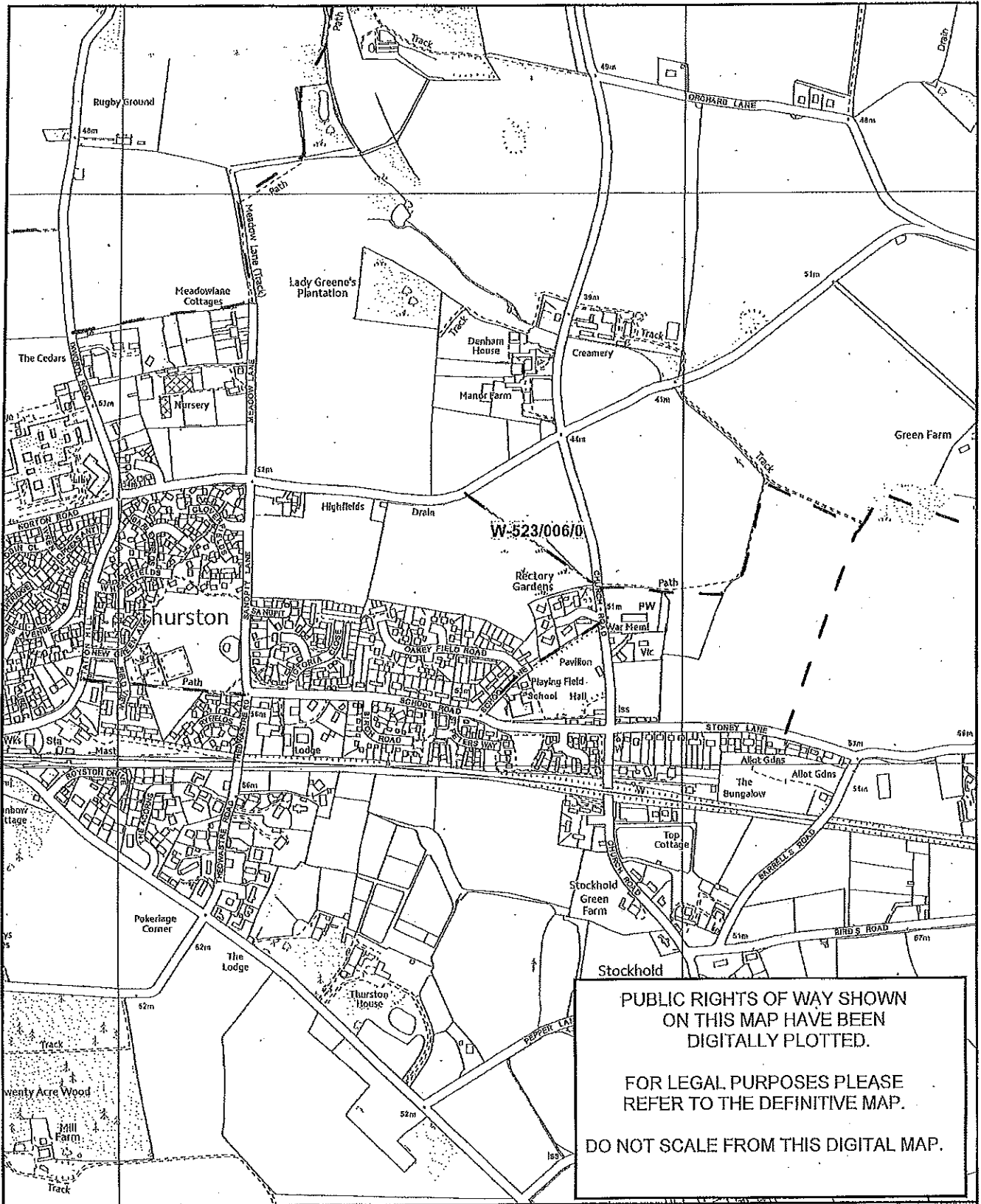
- Public Footpath
- Bridleway
- Restricted Byway
- Byway
- Definitive Map Parish Boundary

Scale 1:7500



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Date: 09/08/216

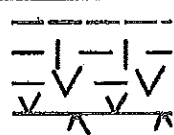


**2797/16 Land to the south of Norton Road, Thurston
Public Footpath 6**



**Suffolk
County Council**

Resource Management
Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX



Ordnance Survey MasterMap

Public Footpath
Bridleway
Restricted Byway
Byway
Definitive Map Parish Boundary

Scale 1:7500



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Date: 09/08/216

Your ref: 2797/16
Our ref: 00045522
Date: 07 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Dylan,

Re: Thurston, land south of Norton Road

Suffolk County Council previously provided a written response to this application for planning permission on 16th August 2016 which was time limited to six months. As this planning application will now be determined outside of this six months' period, the County Council will need to fully review matters. There have been four additional applications for planning permission very recently submitted on sites in Thurston. In view of these applications adding up to over 800 dwellings it is clear that the local situation has fundamentally changed such that the County Council needs to consider the cumulative impact implications on highways and education infrastructure in the locality.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC

Your ref: 2797/16
Our ref: Thurston – land south of
Norton Road 00045522
Date: 17 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Dylan,

Re: Thurston: land south of Norton Road – developer contributions

I refer to the outline planning application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road. The plans have since been amended removing the access onto Norton Road.

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £37,800 towards libraries provision.

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. The County Council's view is that appropriate mitigation from each of the five 'live' planning applications should be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council have 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 in which planning obligations are sought by Suffolk County Council 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 123 Infrastructure 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 letter updates and

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1

replaces previous consultation responses. These responses were submitted prior to the consideration of new information regarding the cumulative impacts on education and highways arising from a further four planning applications which, when including the 175 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 seen as 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 21 January 2016 and started charging CIL on planning permissions granted from 11 April 2016. Mid Suffolk are required by Regulation 123 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
- Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX
www.suffolk.gov.uk

- 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 adopted 123 list.

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

1. **Education.** NPPF paragraph 72 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 | Capacity | | | | Actual/Forecast Pupils Numbers | | | | |
|--|-----------|-------|-----------|-------|--------------------------------|---------|---------|---------|---------|
| | Permanent | 95% | Temporary | Total | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 |
| Thurston CE Academy | 210 | 200 | | 200 | 198 | 211 | 212 | 208 | 203 |
| Exworth Free School (11 - 16) | 597 | 567 | 0 | 567 | 271 | 300 | 342 | 350 | 344 |
| Thurston Community College (11 - 16) | 1500 | 1425 | 0 | 1,425 | 1,501 | 1,599 | 1,585 | 1,547 | 1,547 |
| 11-16 total places | 2097 | 1992 | | 1992 | 1,832 | 1,899 | 1,927 | 1,887 | 1,891 |
| Thurston Community College (with Sixth Form) | 1940 | 1,843 | 0 | 1,843 | 1,828 | 1,849 | 1,862 | 1,872 | 1,868 |

| School level | Minimum pupil yield: | Required | Cost per place £ (2016/17): |
|----------------------------------|----------------------|----------|-----------------------------|
| Primary school age range, 5-11*: | 43 | 43 | 16,429 |
| High school age range, 11-16: | 31 | 0 | 18,355 |
| Sixth school age range, 16+: | 5 | 0 | 19,907 |

| | |
|--------------------------------|--------------------|
| Total education contributions: | £706,447.00 |
|--------------------------------|--------------------|

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 a number of 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 seen as a far from ideal strategy and should only be considered for a very temporary period because there are a number of 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 at this point in time 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 43 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 175 dwellings it is forecast that 43 primary age pupils will arise
- Therefore 43 pupils x £16,429 per place = **£706,447 (2016/17 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 43 places x £1,294 per place = **£55,642.**

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

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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 is allowed to 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 or not to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would have limited powers to impose this on them. Iain Maxwell (Assistant Senior Infrastructure Officer in SCC's, Children and Young People Service) met with the Head teacher and 3 Governors on Thursday 26th January 2017 to explain the situation. Although there were reservations from the school the overall response was to accept in principle the installation of the temporary classroom

if it was needed, providing there was evidence that the new school would be built and open in the early stages of the housing developments to minimise the length of time the temporary building would remain on site. Formal acceptance in writing from the school has now been received.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction commencing on the new school early on. The costs between renting and buying are comparative. Should developers prefer to rent and pay for installation and removal costs this is acceptable to SCC, and an ongoing rental charge/obligation can be included in the Section 106 agreement. 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 = $\frac{£250,000}{60} = £4,167$
- Primary age pupils arising from this site is 43
- Proportionate contribution towards temporary classroom is 43 pupils x $£4,167$ per place = £179,181

The temporary classroom cost of £250k will be apportioned across all developments that secure planning permission, based on dwelling occupations/pupils arising from each scheme up to the maximum of £250k/60 pupils. The planning obligation will need to be worded in such a way for each scheme that the maximum they will pay will be based on total pupils arising and/or limited to the 60 places. In theory the 5 schemes could proportionately split the £250k cost but have a dwelling occupancy restriction once the 60 places have been used up; or any combination of circumstances which may arise.

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.

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However against the anticipated level of housing growth across the wider area a full assessment of secondary school requirements needs to be undertaken, but the initial view is that in due course 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.** Education for early years should be considered as part of addressing the requirements of 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. The Childcare Act in Section 7 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 Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

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 175 dwellings, the County Council anticipates around 18 pre-school pupils eligible for funded early education. Currently there is sufficient capacity for only 10 pre-school pupils from this development. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 8 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 175 dwellings there is the need for 8 additional places
 - Therefore 8 pupils x £8,333 per place = **£66,664 (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:

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- 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.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and 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 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Christopher Fish of Suffolk County Highway Network Management.

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

- 5. Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, 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 Mid Suffolk housing team to identify local housing needs.
- 6. 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

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demonstrated to be inappropriate. The MWS also provides that in considering:

"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 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 WMS took effect from 06 April 2015.

- 7. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fire safety in dwelling houses and promote the installation of sprinkler systems and can provide support and advice on their installation.

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

- 8. Superfast broadband.** 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 impacting 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.

- 9. 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.
- 10. Time limit.** The above information is time-limited for 6 months only from the date of this letter.

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Strategic Development – Resource Management

cc Neil McManus, SCC
Iain Maxwell, SCC
Peter Robinson, Chairman - Thurston Parish Council
Christine Thurlow, MSDC
Steve Merry, SCC

Sent: 25 April 2017 16:26

To: Dylan Jones

Subject: RE: Planning applications for 872 houses in Thurston

Dear Dylan, thank you for your enquiry. Of the 6 applications we only responded to 5070/16, the remaining applications had no environmental constraints in our remit.

Flood risk

None of the sites are in areas at risk of fluvial flooding. The assessment of risk of flooding from surface water is a matter for the lead local flood authority; Suffolk County Council.

Foul water disposal

According to our records there should be sufficient headroom within the Thurston Water Recycling Centre permitted Dry Water Flow to accommodate all 827 dwellings. It is important, however, that you consult Anglian Water as they are the only ones that can confirm whether the local foul sewers have sufficient hydraulic capacity.

The developers of each individual site should already have approached AWS with a Pre-development Enquiry. However, depending on the timing of those enquiries they may not have considered the cumulative impacts.

Water supply

Thurston lies in an area of water stress. Our standard water resources comments for this situation are below:

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

The development lies within the area traditionally supplied by Anglian Water Services Ltd. It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. You should seek advice from the water company to find out if this is the case, or a new source needs to be developed or a new abstraction licence is sought. We may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.

THE LOCATION OF DEVELOPMENT SHOULD TAKE INTO CONSIDERATION THE RELATIVE AVAILABILITY OF EXISTING DEVELOPED WATER RESOURCES

The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.

EVERY OPPORTUNITY SHOULD BE TAKEN TO BUILD WATER EFFICIENCY INTO NEW DEVELOPMENTS, AND INNOVATIVE APPROACHES SHOULD BE ENCOURAGED.

We support all initiatives aimed at reducing water use. The extent of water efficiency measures adopted will affect the demand for water for the development and we would expect that this will be taken into consideration. It is assumed that new houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. We support greywater recycling as it has the potential to reduce water consumption in the average household by up to 35% if achieved in a safe and hygienic manner. It is the responsibility of the applicant to ensure that no local water features (including streams, ponds, lakes, ditches or drains) are detrimentally affected, this includes both licensed and unlicensed abstractions. If the proposal requires an abstraction licence, it is recommended that the applicant contact our permitting centre. Depending on water resources availability a licence may not be able to be granted.

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

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<https://www.gov.uk/government/organisations/environment-agency>

<https://www.gov.uk/flood-risk-assessment-for-planning-applications>

<https://www.gov.uk/flood-risk-assessment-local-planning-authorities>

Iceni House, Cobham Road, Ipswich, IP3 9JD

From: Khan Wasil [mailto:Wasil.Khan@networkrail.co.uk] **On Behalf Of** Town Planning SE
Sent: 03 May 2017 11:57
To: Planning Admin
Cc: Town Planning SE
Subject: Consultation on Planning Application 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH / (anglia)

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application 2797/16 and offering us the opportunity to comment.

We have reviewed the application above and assessed the further combined developments which include the below planning applications.

- 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH – 175 dwellings
- 4963/16 / Land west of Ixworth Road, Thurston IP31 3PB – 250 dwellings
- 4942/16 / Land at Meadow Lane, Thurston IP31 3QG – 64 dwellings
- 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT – 138 dwellings
- 5070/16 - Land at Norton Road, Thurston – 200 dwellings

We note the five submitted developments have a total residential occupancy of approximately 827 units.

It should be noted that Network Rail's strategy is to close level crossings wherever possible as this removes any interface where a person or vehicle could be struck by a train. Therefore the major concern for Network Rail in relation to these proposals, is the Barrow level Crossing at Thurston Station. Historically we have seen a number of issues at this crossing and cannot accept additional impact and further usage unless mitigation and measures are introduced; therefore the preferred option in this location would be to close the level crossing.



The safety justification for closure of the crossing is set out below:

Thurston station level crossing is a footpath crossing with miniature warning lights located at the end of the platforms at Thurston. The crossing traverses two lines and is 8.9m in length, equating to a user requirement of 11.35 seconds to traverse the crossing, with a required sighting distance of 381m, of which there is currently insufficient sighting but this is mitigated by the miniature warning lights.

Trains run frequently over the crossing with approximately 124 trains running at up to 75mph for 24 hours per day with stopping and non-stopping trains.

Particular factors have to be considered for the safety of those using the crossing. Network Rail has a standard Risk Assessment tool called ALCRM (All Level Crossing Risk Model), which determines the predictive level of risk at a level crossing based on a variety of factors, including misuse, train information, number of users, the environment, available sighting etc. Based on the information entered, ALCRM calculates the risk score which generates an individual risk to a user (A to M) and a collective risk (1 to 13) with A and 1 being the highest calculated risk.

Within these risk bands, ALCRM also calculates a Fatality & Weighted Injuries (FWI) score. When the last ALCRM assessment was undertaken in July 2015, Thurston level crossing's risk score was calculated as 0.001924552 (D4), which is outside of ALCRM's high risk categories.

The proposed residential development will see the usage at this crossing increase to a greater level and therefore mitigation options to decrease the risk will need to be explored in order for Network Rail to support the planning application.

Without definitive numbers, the increase in pedestrian footfall has been modelled in ALCRM as follows:

- 75 Pedestrians per day: D4 with a FWI of 0.001924552 (Last census)
- 120 Pedestrians per day: D4 with a FWI of 0.003079283
- 150 Pedestrians per day: D4 with a FWI of 0.003849104
- 200 Pedestrians per day: D3 with a FWI of 0.005132138

As you can see the FWI rises, with 200 pedestrians a day this would move the crossing into a High risk category. Currently a new risk assessment is being carried out and from a safety perspective if the development were to be approved then the level crossing will see a significant increase in pedestrian usage (currently 75 users per day). In all of the aforementioned pedestrian scenarios, there would be a marked increase in the risk profile at this level crossing which would therefore be unacceptable.

Given the increase in risk and increased usage at the station, we believe the development will have a severe effect on safety unless mitigation measures are introduced and contributions are provided in order to fund the closure of the crossing. The measures required to close the crossing are outlined in the attached feasibility report. In light of the 5 applications coming forward, we believe the only fair and reasonable solution would be for the applicants to share the cost of the crossing closure. The cost of the closure is estimated to be £1million, which equates to £1209.19 per dwelling.

Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied by the amount of dwellings which are permitted, to enable the closure of the level crossing.

Reason: To ensure safe and suitable access can be provided in accordance with Paragraph 32 of the NPPE.

Kind Regards,

Wasil Khan
Town Planning Technician, Property

Network Rail
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From: planningadmin@midsuffolk.gov.uk [mailto:planningadmin@midsuffolk.gov.uk]

Sent: 06 April 2017 15:20

To: Town Planning SE

Subject: Consultation on Planning Application 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH

Proposal: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us within 14 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are GP1, NPPF, CSFR-FC1, H17, HB13, RT12, CL8, CSFR-FC1.1, SB3, Cor1, Cor2, Cor5, Cor6, Cor9, CSFR-FC2, T9, T10, HB1, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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Your Ref: MS/2797/16
Our Ref: 570\CON\2797\16
Date: 8th June 2017
Highways Enquiries to: steven.merry@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: planningadmin@babberghmidsuffolk.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/2797/16

PROPOSAL: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road

LOCATION: Land To The South Of, Norton Road, Thurston, IP31 3QH

ROAD CLASS: U

Notice is hereby given that the County Council as Highway Authority does not object to the proposal subject to the imposition of the conditions shown below on any permission to be granted and the completion of a S106 planning obligation to its satisfaction:

Proposed Highway Conditions

1. Condition: The new estate road junction with Sandpit Road inclusive of cleared land within the sight splays to this junction as shown on drawing no. IP15_127_11_SK002 Rev. C (Appendix F Transport Assessment published 18 November 2016) must be formed prior to any other works commencing or delivery of any other materials. The visibility splays shall thereafter be retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (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 a safe access to the site is provided before other works.

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

Reason: To ensure that roads/footways are designed and constructed to an acceptable standard and in the interests of promoting sustainable development.

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

Reason: To ensure that visibility splays and estate roads remain unobstructed by proposed planting in the interests of highway safety; to ensure new trees are not planted too close to carriageways to be lawfully replaced if they become highways and to prevent damage to the roads.

4. 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 construction management 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) protection of important trees, hedgerows and other natural features
- h) protection of the aquatic environment in terms of water quantity and quality
- i) details of proposed means of dust suppression and noise mitigation
- j) details of measures to prevent mud from vehicles leaving the site during construction
- k) haul routes for construction traffic on the highway network and
- l) monitoring and review mechanisms.

~~No works in respect of the construction of the development hereby permitted and no deliveries to the site during construction shall be undertaken at the following times;~~

~~Outside the hours of 0800 - 1800 on Mondays to Fridays (inclusive)~~

~~Outside the hours of 0800 - 1300 on Saturdays~~

~~On Sundays and on public holidays~~

Reason: In the interests of highway safety residential amenity and to ensure compliance with the Local Plan.

Note: the struck through elements of the above condition aren't considered necessary or in deed acceptable by the highway authority but may be relevant for other reasons.

5. Condition: Before the development is commenced details of the areas to be provided for the manoeuvring and parking of vehicles including secure cycle storage and electric vehicle charging infrastructure 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, where on-street parking and manoeuvring would be detrimental to highway safety and further to National Planning Policy Framework paragraph 35.

6. Condition: Before the development is commenced details of the areas to be provided for the storage and presentation for collection 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. This is necessary to avoid inadequate space being provided.

7. Condition: Before the development of each dwelling plot is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development plot and its access onto the estate roads. The approved scheme(s) shall be carried out in their entirety before the dwelling(s) are first occupied and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the estate roads, which are prospective highways. This is necessary to ensure adequate drainage measures can and are installed.

Note: The above condition may be incorporated into an overarching drainage condition.

8. Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. This shall include how the surface water will be disposed of. 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. This is necessary because details have not been submitted to demonstrate how this will be achieved at the proposed access.

9. Condition: No dwelling shall be occupied until the highway improvements shown on drawing no. IP15_127_11_SK002 Rev. C including local carriageway widening, bus stops including shelters and footways along Sandpit Lane have been substantially completed.

Reason: In the interests of highway safety and sustainable development.

10. Condition: No dwelling shall be occupied until a footway along Church Road as shown on drawing IP15/127/11/SK04 with street lighting has been substantially completed.

Reason: In the interests of highway safety and sustainable development.

11. 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: To ensure that satisfactory access is provided for the safety of residents and the public.

12. Note: The existing street lighting system may be affected by this proposal. The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 01284 758859, in order to agree any necessary alterations/additions to be carried out at the expense of the developer. The design of street lighting and any tree planting interrelate.

13. Note: 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 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 as necessary.

Proposed S106 Obligations:

1. Highway Improvement Contribution: £3733 contribution towards a Traffic Regulation Order (TRO) and associated works to extend the existing 30mph of speed limit on Norton Road eastwards to improve road safety for road users associated with the development. Payable prior to occupation of the first dwelling.
2. Highway Pedestrian Crossing Improvement Contribution: £19108 Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction to provide improved pedestrian access to the Academy and mitigate increase pedestrian and vehicle use. Payable on occupation of the first dwelling.

3. Highway Capacity Improvement Contribution: £60308 Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton to mitigate congestion at peak periods. Payable on commencement of work on site.
4. Highway Safety Improvement Contribution: £11046 Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a contribution towards 40mph speed limit on the C692 Thurston Road to improve road safety and mitigate increased use. Payable on commencement of the first dwelling.

All the above 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.

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

5. 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 longer.

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.

6. Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 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:

7. Implementation of the Interim Travel Plan (when approved)
8. Provision of an approved welcome pack to each dwelling on first occupation
9. Approval and full implementation of the Full Residential Travel Plan on occupation of the 100th dwelling.
10. Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longer.
11. Securing and implementing remedial Travel Plan measures if the agreed reduction of vehicular use targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

Comments:

1. 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.

2. 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.
3. Following this application, the applicant submitted a duplicate planning application ref MS/5010/16. A separate response will be provided for that application
4. The reasons for refusal given in our letter dated 27th October 2016 relating to access from Norton Road have been addressed through the revised details including drawing no. Thur/01 Rev C – Development Framework Plan. If considered in isolation from the four subsequent major development applications in Thurston, notably application reference MS/5070/16 on land on the north side (opposite) of Norton Road, there is no reason remaining to refuse the proposal on transport grounds that cannot be addressed through conditions or S106 obligations.
5. It is recommended that a footway with street lighting be provided to link to the footpath leading to the existing primary school and wider community to the south and the open space. shows this footway and appears to be feasible. This ought to be provided before demand to use it will first arise from the new residents occupying the site.
6. Improvements to the surfacing of the footpath (Thurston Public Footpath 6), to make it useable all year, can be secured by condition. Likewise, connecting paths into the body of the development must be usable all year. This is directly relevant to the development, as children would not be expected to use this length of Church Road or onsite paths otherwise.
7. Contributions 1 to 4 and the costs attributed to each of the five development sites assume a collaborative approach to mitigating increase use of the public highway resulting from the five proposed developments in the Thurston area as outlined in our letter of the 10th March 2017. If this application is determined as a stand-alone application these conditions and contributions would need to be re-assessed
8. Whereas with no development on the north side of Norton Road there would be reduced reason for pedestrians from the Hopkins Homes development to use the footpath between Norton Road and Church Road to access Norton Road. The potential relocation of the primary school would make this route more attractive for residents of the east side of the site and beyond. In the interests of sustainable development overall, safe pedestrian access between the sites should be facilitated or at least not thwarted by the layout of the development.
9. Advisory comments only regarding internal road layout were made previously. One such comment referred to emergency access and it is noted that the main access road to the east half of the site includes a 3.7m wide footway/cycle track to reduce to a minimum the likelihood of complete obstruction of the sole access route. In addition, the advice regarding preferable locations of trees appears to have been heeded.
10. The revised Interim Residential Travel plan dated 2nd November 2016 is better than the original but is still not considered to be adequate.
11. One issue is the lack of any suitable measures to encourage the residents to travel sustainably. The provision of information alone in the proposed Welcome Packs will not be adequate. In common with other similar large residential proposals in Suffolk and at a minimum, it is recommended that a multi-modal voucher to the value of two monthly rail season tickets to Bury St Edmunds, or bus tickets or cycle voucher of equivalent value should be offered to each dwelling to incentivise sustainable travel in a meaningful manner. This will allow up to two residents per dwelling to experience the use of sustainable transport for enough time to potentially establish a routine. If this measure is implemented correctly (i.e. the resident must apply for the voucher through the Travel Plan Coordinator) it can also be cost-effective and provide additional monitoring for the Travel Plan.
12. There is still no reference to any remedial measures in the event the 10% modal shift in favour of sustainable transport is not achieved at the end of the Travel Plan monitoring period. The use of remedial measures is supported by the following paragraph of the Travel Plans, Transport Assessments and Statements in Decision Taking section of the 2014 Planning Practice Guidance:

"Travel Plans should identify the specific required outcomes, targets and measures, and set out clear future monitoring and management arrangements all of which should be proportionate. They should also consider what additional measures may be required to offset unacceptable impacts if the targets should not be met." Therefore, some suitable remedial measures, such as resubmitting welcome packs and off-site smarter choices should be included in the Travel Plan. Also, there is no reference to the Travel Plan issues that will need to be overcome with hard infrastructure, such as the links to the two schools.

13. There have been improvements to the baseline data and monitoring duration proposed in Travel Plan, so those issues have been resolved.

Yours sincerely,

Steve Merry
Transport Policy and Development Manager
Strategic Development – Resource Management

From: Steve Merry
Sent: 12 June 2017 18:07
To: Dylan Jones
Cc: Philip Isbell; Neil McManus; Christopher Fish
Subject: Thurston Matrix

Dylan
Matrix as requested
Regards
steve

Steve Merry
Transport Policy and Development Manager
Resource Management
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich, Suffolk
IP1 2BX

Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

Calc sheet

| Item | Location | Process | Total Cost | 2/9/76 | 4/8/76 Full | 4/9/76 Full | 4/9/76 Full | 5/0/76 | Trigger Point |
|------|---|---|-------------------------|----------|-------------|-------------|-------------|----------|--|
| T1 | 1/43 Barton Road / C587 Thurston Road / C549 Broad Road | Junction improvements (capacity) | \$106 | 175 | 138 | 138 | 138 | 138 | Land west of Heath Road, Thurston |
| T2 | C589 Thurston Road / C582 Thurston Road / C583 New Road | Junction improvements (Road Safety). Re-locate road through new development to create two 3 way safety junctions. Install 40mph speed limit | \$106 | \$50,887 | \$47,575 | \$22,249 | \$68,811 | \$65,528 | Land west of Barton Road, Bowth Road, Thurston |
| T3 | C591 Barton Road / C582 Station Road (N rail line) | Junction improvements (capacity) | \$106 | 0 | 0 | 0 | 250 | 250 | Pilsen |
| T4 | Iveworth Road | Extend speed limit to Thurston Rugby Club | \$106 | 0 | 0 | 0 | 250 | 250 | |
| T5 | Norton Road (east) | Extension of speed limit | \$106 | \$1,046 | \$8,711 | \$4,040 | \$45,760 | \$42,624 | |
| T6 | Barton Road | Extension of speed limit west of Mill Lane | \$106 | 0 | 0 | 0 | 250 | 250 | |
| T7 | Norton Road (east) | Provision crossing facilities between Meadow Lane and Station Hill / Joveth Road (uncontrolled) | \$278 | 0 | 0 | 0 | 250 | 250 | |
| T8 | Iveworth Road | Footway on west side between Norton Road and Pilsimon site | \$278 | 0 | 0 | 0 | 250 | 250 | |
| T9 | Iveworth Road | Footway link to Thurston Rugby Club | \$278 | 0 | 0 | 0 | 250 | 250 | |
| T10 | Norton Road / Station Hill / Iveworth Road | Provision crossing facilities (zebra on Norton Rd east and footway on north side from Church Lane) | \$106 | \$19,108 | \$5,988 | \$27,297 | \$27,858 | \$27,858 | |
| T11 | Norton Road (east) | Crossing between Hopkins site and Pilsimon site (uncontrolled) | \$278 | 0 | 0 | 0 | 250 | 250 | |
| T12 | Norton Road (east) | 2 no pedestrian crossing (uncontrolled) south of Clewfields and north of sandpit Drive | \$278 | \$2,333 | 0 | 0 | 57 | \$2,867 | |
| T13 | Church Road | Provision installed footway | \$278 (check ref \$106) | 0 | 0 | 0 | 0 | 0 | |
| T14 | Church Road | Street lighting | \$278 | \$10,000 | 0 | 0 | 0 | 0 | |
| T15 | Sanfill Lane | 2 no pedestrian crossing (uncontrolled) south of Clewfields and north of sandpit Drive | \$278 | \$50,000 | 0 | 0 | 0 | 0 | |
| T16 | Barton Road | Extension of footway along Barton Road | \$278 | 0 | 138 | 0 | 0 | 0 | |
| T17 | Norton Road | Bis slips east of Rylands Circle | \$106 (can be \$278) | 0 | 0 | 64 | 0 | 0 | |
| T18 | Meadow Lane | Modify to improve cycle / pedestrian facilities (bar mainline steps to pavements) | \$278 | 0 | 0 | 0 | 250 | 250 | |
| T19 | Iveworth Road to Meadow Lane | Improve PROW 001 (un installed?) | \$106 | 0 | 0 | 0 | 250 | 250 | |
| T20 | Iveworth Road to Mill Lane | Improve PROW 018 (un installed) | \$106 | 0 | 0 | 0 | 250 | 250 | |
| T21 | Barton Road to Heath Road | New PROW link along southern boundary to Heath Road and Side Road 51 | \$106 | 0 | 188 | 0 | 0 | 0 | |
| T22 | Barton Road | New PROW link along southern boundary to Bin Barton Road | \$38 | 0 | 0 | 0 | 0 | 0 | |
| T23 | Norton Road to Church Road | Improve PROW 006 (installed) | \$38 | \$30,000 | 0 | 0 | 0 | 0 | |
| T24 | North of Meadow Lane | Improve PROW 007 (un installed) | \$106 | 0 | 0 | 0 | 0 | 0 | |

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Committee Report

Committee Date: 12th July 2017

Item No:

Planning Reference: 5010/16

Appeal Reference: APP/W3520/W/17/3172098

Case Officer: DYJO

Description of Development: Appeal for non-determination of a major planning application within the 13 week statutory timescale for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (Application 2797/16 is a duplicate proposal to this one).

Location: Land to the south of Norton Road, Thurston IP31 3QH

Parish: Thurston

Ward: Thurston & Hessett

Ward Member/s: Councillors Esther Jewson & Derrick Haley

Site Area: 11.2

Conservation Area: None

Listed Building: Manor Farm – Grade 2*, converted Manor Farm Barns - Grade 2, Church of St Peter Grade 2 – These are all buildings in the surrounding locality.

Received: 16/12/2016

Expiry Date: 18/03/2017

Application Type: Outline (but now the subject of an appeal)

Development Type: Smallscale Major Dwellings

Environmental Impact Assessment: Schedule 2 development – EIA not required.

Applicant: Hopkins Homes

Agent: Armstrong Rigg Planning

DOCUMENTS SUBMITTED FOR CONSIDERATION

The defined Red Line Plan for this application was received on the 19th December 2016. This drawing is the red line plan that shall be referred to as the defined application site. Any other drawings approved or refused that may show any alternative red line plan separately or as part of any other submitted document have not been accepted on the basis

of defining the application site.

Submitted Documents:

Application form dated 19th December 2016
Highway access plan ip15_127_11_sk002 rev c 19th December 2016
Highway improvement plan ip15_127_11_sk04 19th December 2016
Development framework plan thur/01 rev c 19th December 2016
Site location plan 19th December 2016
Arboricultural impact assessment 19th December 2016
Archaeological desk based assessment 19th December 2016
Combined planning & Design & Access Statement 19th December 2016
Extended phase 1 habitat survey
Geophysical survey report
Hedgerow survey
Heritage response to Historic England
Heritage statement
Land sensitivity study
Sustainability assessment
Transport assessment
Tree survey schedule
Tree survey plan
Tree protection plans
Landscape visual impact assessment
Interim travel plan

The application plans and documents submitted by the Applicant can be viewed online via the following link:

<http://planningpages.midsuffolk.gov.uk/online-applications/simpleSearchResults.do;jsessionid=A71703B5E1290C2FA93C17E5AC35A7F1?action=firstPage>

Alternatively, a copy is available to view at the Mid Suffolk and Babergh District Council Offices.

SUMMARY

Hopkins Homes has decided to appeal to the Planning Inspectorate (PINS) against the Council not determining their application within the statutory 13 week period. Part of this process involves the Council advising PINS of how it intends to defend the appeal and as such, this report is before members to resolve upon a 'minded to decision' which will allow officers to present the case for the local planning authority at the appeal in an appropriate manner..

The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations including having regards to other major residential development in Thurston. The scheme is contrary to the adopted Mid Suffolk Core Strategy; however, the Council cannot demonstrate a 5 year supply of housing and the scheme falls to be considered under paragraph 14 of the NPPF where the adverse impacts of the scheme have to be balanced against the benefits of the

scheme to demonstrate that it constitutes sustainable development. Officers are recommending that the Council should advise the Planning Inspectorate that it is 'minded to approve' this proposal as it is considered to be sustainable development as the significant public benefits that the scheme will deliver (contributions towards a new school, pre-school, highway improvements, health provision, affordable housing and library facilities amongst others) are considered to outweigh the negative aspects of the proposal.

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reason:

- It is a “Major” application for residential land allocation for 15 or over dwellings which is now at appeal.

PART TWO – APPLICATION BACKGROUND

1. This section details history, policies, advice provided, other legalisation and events that forms the background in terms of both material considerations and procedural background.

History and other relevant proposals

2. The planning history relevant to the application site is listed below. A detailed assessment of the planning history including any material Planning Appeals will be carried out as needed in Part Three:

| | | |
|------------|---|---|
| 2797/16 | Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (Original and identical application to the proposal in this report) | Identical application to this one – currently undetermined. |
| 0337/88/OL | Residential development of 24.36 acres with new or altered vehicular accesses, including site for Primary School, open space and 0.5 acre for Parish Council housing. | Refused 05/04/1989 |
| 0022/86/OL | Residential development with allocation of open space | Refused 24/03/1986 |

3. The following applications are also considered to be relevant to the consideration of this proposal as they represent the other major applications for residential

development in Thurston that are currently with the Council for consideration:

- 4386/16 Full planning application for the erection of 138 dwellings on land on the west side of Barton Road, Thurston. The applicant is Bovis Homes.
- 4942/16 Full planning application for the erection of 64 dwellings on land at Meadow Lane, Thurston. The applicant is Laurence Homes.
- 4963/16 Outline application for the erection of up to 250 dwellings and associated infrastructure including the provision of up to 2.4ha of land for use by the Thurston Community College and the provision of land for a new primary school on land west of Ixworth Road, Thurston. The applicant is Persimmon Homes.
- 5070/16 Outline application for the erection of up to 200 homes (including 9 self-build plots), land for a new primary school together with associated access, infrastructure, landscaping and amenity space on land at Norton Road, Thurston. The applicant is Pigeon Capital Management.

The consideration of the cumulative infrastructure issues that this group of applications present has been explored in a collaborative but without prejudice working group including County and District Council Officers with the five respective applicants and their technical advisers. This has enabled a constructive and timetabled analysis of the proposals and their cumulative impact.

Details of Previous Committee / Resolutions

- 4. None

Details of Member site visit

- 5. Members visited Thurston on the 13th June to look at this site and the four other residential development schemes that are currently with the Council for consideration.

Details of any Pre Application Advice

- 6. The applicant engaged with the Council and received pre-application advice on the principle of the development and its acceptability having regards to the fact that the Council does not have a 5 year supply of housing.

PART THREE – ASSESSMENT OF APPLICATION

7. Summary of Consultations

Thurston Parish Council (incorporating the comments of their Neighbourhood Plan Team as requested by the parish) - Objects to the

scheme on the following grounds:

- Thurston is to face an unprecedented level of growth due to the submission of 6 planning applications proposing over 800 houses between them.
- The 6 applications need to be considered on a cumulative basis as failure by the District Council to do so would result in the individual schemes having a significant impact on the local community and it wouldn't meet the requirements of the NPPF.
- Consider that the Neighbourhood Plan should be given some weight in the consideration of this proposal as it has been the subject of public consultation despite not allocating sites or proposing planning policies.
- The speed of the submission of the applications in Thurston and the amount of dwellings proposed between the five undetermined applications and the Granary site will result in Thurston losing its 'village feel' and for it to become 'a small dormitory town'.
- The cumulative impact of the scheme needs to be considered in the light of the 101 residences (92 dwellings and one block of flats incorporating 9 units) already granted at the Granary site.
- The current primary school is at capacity and it is landlocked and cannot be extended. Any additional houses would need additional primary school places. Agree with the County Council's stance that a new primary school is required and it should be provided before the dwellings are occupied. However, a new school causes its own infrastructure issues and there is nowhere in Thurston that has current adequate provision to assimilate the pedestrian and vehicle movements particularly at the beginning and at the end of the day in school term.
- Development is proposed on the best and most versatile agricultural land on the northern part of the village.
- The density of all of the schemes is too high and they reflect urban typed development rather than what you would expect in a village.
- The local community would prefer to see schemes of no greater than 50 dwellings being built with more open space around them. They would also like to see more bungalow developments which the developers are not providing. There should also be more one and two bedroom flats/apartments and houses in the schemes.
- Thurston is accessed by a network of A roads and country lanes which are not well maintained by the County Council and are not of a design or standard to accommodate increased growth in Thurston and also that planned in the surrounding villages and in Bury St Edmunds.

- Congestion of the local highway network already exists and these schemes will make the situation worse and will cause more accidents to occur at key sites which already experience accidents in the village.
- There are no plans by network rail to improve the station at Thurston and this will cause capacity, parking and safety issues.
- The number of dwellings proposed cumulatively will cause social impacts for the local community. These have been split in a pros and cons list as below:

| Positive | Negative |
|--|--|
| <ul style="list-style-type: none"> • New purpose built school more attuned to 21st Century needs. • Improved facilities and to allow more clubs and organisations to increase will increase their sustainability. • More residents in the locality would help to support a greater variety of leisure facilities in the village. | <ul style="list-style-type: none"> • A new school would potentially trigger more new houses in the future which would change the social dynamics of the village. • New cycle and walking routes to the new school would have to be created as they don't exist at present. • Newcomers to the village will put pressure on current organisations in the village will not be able to expand to meet this increased demand. |
| <ul style="list-style-type: none"> • A greater variety of shops and facilities would be supported. | <ul style="list-style-type: none"> • More shops and facilities will change the character of the village into a small town and local residents will resent this change and the new developments that have caused this change to happen. |
| <ul style="list-style-type: none"> • More residents will sustain bus and train services in the locality. | <ul style="list-style-type: none"> • More residents will increase pressure on the network which cannot be met unless improvements are made to the railway station car park. |
| <ul style="list-style-type: none"> • More pressure for a medical surgery. | <ul style="list-style-type: none"> • The nearest practice doesn't have capacity and all that is being asked through this and the other schemes is a contribution towards health care which will make the service unsustainable. |
| <ul style="list-style-type: none"> • Additional footpaths and cycle ways will offer a variety of routes for walkers and cyclists. | <ul style="list-style-type: none"> • The new residents using the paths will not be familiar with the way that local residents look after their valued paths and this could result in bad feeling against them. There may also be more dogs off |

| | |
|--|-----------------------------------|
| | leads which could cause problems. |
|--|-----------------------------------|

Specifically in relation to the Hopkins scheme, the Neighbourhood Plans team raise the following points:

- That whilst the provision of 2 crossings is welcomed, the concern is that these are uncontrolled and will cause confusion as in the case of such a crossing located to the south of the development.
- Road safety issues with emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pokeridge Corner.
- Road safety with emphasis on the junctions of Norton Road and Ixworth Road for those accessing the Community College at the AM and PM peak times.
- Impact of the vehicular movements from a single point of entry.
- Development inappropriate to that of land abutting the countryside.
- Development inappropriate to that of sites abutting the proposed land – whilst the new outline plans have bungalows backing onto bungalows in existing housing areas, there is a concern that the outline plans show 2.5/3 storey dwellings which are neither in keeping or in conformity with the rest of the village nor suitable for a site in such a location on the edge of a village.
- Village infrastructure particularly education and medical provision.
- Type and density of housing mix not in accordance with the Neighbourhood Plan findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people.
- Cost of affordable homes for local residents – the application fails to take into account the District Wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

Thurston Parish Council have raised the following additional comments in relation to this scheme:

- 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. The proposal is contrary to policy GP1, H13 and H16 of the local plan,

policies FC1.1 and FC2 of the Core Strategy Focused Review and policy CS5 of the Core Strategy.

- The internal layout of the scheme is not in keeping with development in the surrounding area as 2.5 and 3 storey dwellings are proposed.
- Development of this site with 175 dwellings will result in it intruding into what is currently open, undeveloped, countryside resulting in encroachment which will harm the character and appearance of this open area and is 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.
- The development fails to ensure that it reflects the local character and the identity of the area and is inconsistent with paragraph 58 of the NPPF and it fails to consider the loss of permanent pastureland and fails to consider the loss of permanent pastureland and will be contrary to policy CL8 – protecting wildlife habitats.
- Considers that the application has still not considered adequately the current road infrastructure both for vehicles and pedestrians and the negative impact that will be had on road safety. It is still held that the location of the site will have 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). The proposal is also contrary to paragraph 32 of the NPPF.

MSDC - Environmental Health - Land Contamination – They have not responded in relation to this proposal. However as this scheme is identical to the earlier application it is considered that their comments are still applicable. The earlier comments are as follows:

Does not raise any objections to the original scheme or the amended plans. Request that conditions are imposed to control the impact of the scheme in terms of contamination.

MSDC - Environmental Health – Public Protection – Advises that they wish to provide the same comments as they have for the duplicate planning application 2797/16. Their comments for that application are summarised as follows:

Raise concerns that a number of the new dwellings will be in close proximity to the Victoria Public House and that noise, nuisance and disturbance from the operation of the pub, both inside and in the external beer garden could cause public protection issues. It has also been suggested that a condition should be imposed to control noise and disturbance during the construction phase of the scheme to ensure that the living conditions of the surrounding occupiers are protected.

MSDC Heritage Officer – Considers that the comments made on the earlier application 2797/16 still apply. The officer advises that the site is in close

proximity to the Grade II listed Church of St Peter and also to Manor Farm which is Grade 2* listed and also the barn to the north of it which is Grade II listed in its own right. The Historic Buildings Officer considers that the proposal would cause less than substantial harm to the designated heritage assets listed above as it would erode their rural setting but he also considers that the impact is low due to the existing landscaping between the site and the heritage assets. The Heritage Team recommends that refinement of the layout and landscaping scheme should be pursued. This can be done via a planning condition as the application is outline and the entire layout, design and landscaping can be altered and refined at reserved matters stage to meet this requirement.

As there are now 5 separate housing proposals in Thurston which together total 872 houses, with the potential for the cumulative impact of two or more of the schemes to have an impact on the heritage assets listed above, the Council's Heritage Officer has been asked for his comments. He considers that in terms of the assets listed above, only the Pigeon site (5070/16 and this proposal) will have a cumulative impact. He has assessed when considered together that 375 houses (up to 200 on the Pigeon site and up to 175 on this site) on a cumulative basis would cause harm to the grade II* Listed farm house of no greater than medium. He has assessed that even adding the harm to the significance of the nearby church; the resulting cumulative level of harm to the affected heritage assets would be greater than low but not greater than medium.

MSDC - Strategic Housing (Summary) – Advises that no objections are raised to the scheme as submitted as 35% affordable housing is proposed in line with the Council's requirements. The strategic Housing Officer advises that the affordable housing provision should be provided on site as follows:

Affordable Rent Tenancy:

14 x 1b 2p flat = 50sqm

8 x 1b 2p bungalow = 50sqm

18 x 2b 4p house = 79sqm

5 x 3b 6p house = 95sqm

1 x 4b 7p house = 115sqm

Shared Ownership:

10 x 2b 4p house = 79sqm

5 x 3b 5p house = 93sqm

MSDC - Tree Officer – Advised that he wishes to provide the same comments as he did for the duplicate planning application 2797/16. His comments for that application are summarised as follows:

Does not object to the proposal subject to the trees on site that are to be retained being protected during the build process in line with the details contained in the application. Whilst a number of trees are to be removed to facilitate this development, they are of poor species and their loss will be negligible on the character and appearance of the area.

SCC Highways – The Local Highway Authority has considered the cumulative impact of the provision of 827 houses on all 5 sites in Thurston on the highway network. They have concluded that the impact of all 5 sites coming forward without mitigation could be severe on the local highway network (paragraph 32 of the NPPF) but under paragraph 21 of the NPPF, the County and the District Council has a duty to recognise and address potential barriers to investment, including any lack of infrastructure and identify areas for infrastructure provision. The Local Highway Authority considers that cost effective measures can be put into place to overcome the potential impacts of the scheme and to render its impact as not being severe on the local highway network.

The Local Highway Authority has advised that the following junctions are or may exceed capacity:

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

Modelling shows that this junction is already close to theoretical capacity in the AM peak with northbound traffic waiting to turn onto the A143 queueing on Barton Road and at capacity in the PM peak with Thurston bound traffic waiting right from the A143 into Barton Road. The additional traffic from the proposed developments in Thurston will exacerbate these problems; in particular, modelling shows the queueing traffic on Barton Road will exceed capacity in the AM peak.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

Modelling indicates that the southbound approach to the junction is currently close to capacity in the morning peak and that its capacity will be exceeded before all five developments could be delivered. However, in the PM peak the junction has the capacity for the predicted traffic for all developments.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The modelling of this junction shows some inconsistencies with one study indicating it will be close to capacity southbound on Thedwastre Road in the AM peak due to traffic from one specific development but other modelling showing it would have capacity for the traffic generated by the developments.

Highway Infrastructure (Road Safety)

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

There have been three recorded crashes resulting in slight injuries and one involving serious injury at this junction in the last 5 years for which data is available (2012-2016).

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

There have been two crashes resulting in slight injuries at this junction in the past 5 years

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

At this junction there have been 9 crashes resulting in slight injuries and one resulting in a serious injury in the past 5 years.

The frequency of injury related crashes at the C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner) junction would, in the opinion of SCC, necessitates some work to improve road safety. Although the

frequency of crashes at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road does not justify significant road safety improvements it is a factor that should be considered in any future mitigation measures.

Suggested Mitigation Measures

A143 Bury Road / C691 Thurston Road/ C649 Brand Road

An assumption has been made that the junction can be signalised and that this will reduce congestion and improve road safety. Although there is a generous width of highway verge in the vicinity of the junction the geography of the site may place constraints on the design and further work is required to confirm that a solution is possible or beneficial. The proposed junction improvements would be delivered through a jointly funded S106 contribution.

C693 Thurston Road / C692 Thurston Road / C693 New Road (Fishwick Corner)

The issue of congestion on the southbound approach is difficult to mitigate as there is insufficient land within the highway boundary to provide a meaningful solution. It is noted that the road network around Thurston is relatively permeable and an option exists for traffic to avoid this by diverting onto Beyton Road and then turning right to approach this junction from the east.

Several minor traffic management features such as improved signing, marker posts and high friction surfacing have been used at this junction in the past as crash reduction measures. Despite this, crashes causing injury continue to occur. To reduce the severity of these crashes it is proposed to restrict the road to 40mph and undertake local safety improvements such as enhanced road signs and markings. This would be delivered through a jointly funded S106 contribution.

A longer term solution would be to remodel the junction or drastically remodel the road network. It is recommended these matters should be addressed in any future revisions to the Local Plan.

C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road

The highway boundary constrains any improvements in this location and thus there does not appear to be any viable mitigation to increase capacity on the southbound Thedwastre Road approach. The relatively low number of crashes suggests that the issue of road safety is not as important as it is for the other two junctions and mitigation measures would only comprise low cost work, such as road signs and markings.

Speed Limits

Based on the available details of the five proposed developments the following changes to speed limits are suggested;

- Extend the 30mph speed limit north on Ixworth Road to Thurston Rugby Club
- Extend the 30mph speed limit on Norton Road towards and beyond Church Road

- Extend of 30mph speed limit on Barton Road west of Mill Lane
- Create a new 40mph speed limit between and including the C693 Thurston Road / C692 Thurston Road / C693 New Road and the C560 Beyton Road / C592 Thurston Road / U4920 Thedwastre Road for road safety reasons.

Alterations to the speed limits cannot be done under the planning regulations and must be done under the Traffic Regulation Orders which is a separate Highway process governed by the County Council.

Pedestrian and Cycling Infrastructure

The suggested improvements to the pedestrian and cycling infrastructure that are considered to be necessary are as follows:

- An uncontrolled pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road.
- A footway on west side of Ixworth Road between Norton Road and the entrance to Persimmon's site
- A footway link on Ixworth Road between the entrance to the Persimmon development and the entrance to the Thurston Rugby Club.
- A controlled pedestrian crossing facility (e.g. a raised table junction with zebra crossing) if practicable at or adjacent to the Norton Road / Station Hill / Ixworth Road junction. Pooled contributions from all 5 developments are required for the County Council to deliver this.
- A footway on the north side of Norton Road from Meadow Lane east towards Church Lane as far as the site boundary allows. This could be within the development and or on the highway verge.
- An uncontrolled pedestrian on Norton Road crossing linking the Hopkins Homes and Pigeon sites
- Meadow Lane resurfaced to improve cycle / pedestrian facilities (and maintain access to properties)
- Provide a metalled footway on Church Road between Footpath 006 and the footpath link to School Lane. This will include provision of street lighting along this short section of footpath.
- Provide two uncontrolled pedestrian crossings on Sandpit Lane to link the Hopkins Homes development to the main village.

Public Rights of Way (PRoW)

It is proposed that a small number of PRoW are improved to provide alternative pedestrian links between the proposed developments and current and future school sites. These are improvements to:

- Thurston Footpath 001 between Ixworth Road and Meadow Lane. It is

proposed that this is to an all-weather standard, preferably a bituminous surface.

- Thurston Footpath 018 between Ixworth Road and Mill Lane. This lies within the development site and the works can be secured by condition.
- Thurston Footpath 006 between Norton Road and Church Road. This lies within the development site and the works can be secured by condition. It is proposed that this is to an all-weather standard; preferably a bituminous surface as far as it is a safe pedestrian route to the site north of Norton Road.
- New PROW link along southern boundary of the Bovis Homes site to join Barton Road.
- New PROW link from the site west of Barton Road to Heath Road, linking with Cycle Route 51.
- Improve PROW 007 North of Meadow Lane (un metalled)

Public Transport

Improvements to public transport infrastructure will be limited to any site-specific works necessary as a result of each development through S106. All other public transport improvements are included in the CIL.

The Local Highway Authority advises that the remainder of the issues that are relevant to this proposal can be covered by planning conditions and within the S106 agreement for the scheme.

The S106 heads of terms will cover the following issues:

- Highway Improvement Contribution: £3733 contribution towards a Traffic Regulation Order (TRO) and associated works to extend the existing 30mph of speed limit on Norton Road eastwards to improve road safety for road users associated with the development. Payable prior to occupation of the first dwelling.
- Highway Pedestrian Crossing Improvement Contribution: £19,108 Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction to provide improved pedestrian access to the Academy and mitigate increase pedestrian and vehicle use. Payable on occupation of the first dwelling.
- Highway Capacity Improvement Contribution: £60,837 Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton to mitigate congestion at peak periods. Payable on commencement of work on site.
- Highway Safety Improvement Contribution: £11,046 Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a contribution towards 40mph speed limit on the C692 Thurston Road to improve road safety

and mitigate increased use. Payable on commencement of the first dwelling.

- 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.
- Travel Plan Implementation Bond, or cash deposit - £118,525 (£593 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.

Except for the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton the reasons for requesting these contributions are described above. The A143 improvements are mitigation to improve capacity at this junction reflecting the small individual but, in terms of cumulative impact, significant effect that the five developments will have at this junction. The Local Highway Authority has indicated that the cost of this will be £94,724 for the works required under S106 of the Planning Act, £72,333 for works under section 278 of the Highways Act and £30,000 under S38 of the Highways Act.

SCC - Obligations Manager: Comments that the 175 new houses proposed in the scheme will generate approximately 403 new people living on site. As such, the proposal will have an impact on local infrastructure. It has been advised that there is no capacity in the local Primary School which is the Thurston Church of England Primary Academy to accommodate this development and as such a contribution is requested towards a new 420 place, two forms of entry primary school to meet new pupil place needs.

As new schools cannot be provided through the Council's CIL (the 123 list only allows for extensions to schools and not new schools) a request is made for a contribution under S106 of the planning act. A contribution for £706,477 (2016/2017 costs) as broken down below is require to meet the primary age (key stage 1 and 2) education needs which will arise from this development:

| School level | Minimum pupil yield: | Required: | Cost per place £ (2016/17): |
|----------------------------------|----------------------|-----------|-----------------------------|
| Primary school age range, 5-11*: | 43 | 43 | 16,429 |
| High school age range, 11-16: | 31 | 0 | 18,355 |

| | | | |
|-------------------------------------|----------|----------|---------------|
| Sixth school age range, 16+: | 5 | 0 | 19,907 |
|-------------------------------------|----------|----------|---------------|

A contribution for a further £55,642 is also requested to contribute towards the cost of the land to provide the school. (Based on the cost of £247,100 per hectare with it costing £543,620 for the 2.2ha site proposed which works out at £1294 per pupil. It is anticipated that 43 places will arise from this scheme (£1294 x 43) which equals £55,642.

Total primary education contributions: £762,119

Temporary classroom

The physical constraints of the existing primary school means that its permanent expansion is not possible. Therefore temporary arrangements will need to be put into place to accommodate the additional pupils arising from the homes. The Department for Education (DfE) provides minimum site area guidelines for schools and in this instance; a single entry school has to have a minimum area of 11,220m² (this figure includes all buildings and outside play areas). The existing school has a site area of 11,169m² and is already below the DfE standard and therefore no more accommodation can technically be added to the school. However, where there is an unavoidable and sudden spike in population growth (which would be the case with new housing), schools can provide temporary classrooms to meet this bulge in numbers until a suitable alternative is provided. The County has agreed with the school to provide a double mobile on the car park area at the school with this building being retained for a 2-3 year period. The double classroom will be able to facilitate 60 additional pupils as an interim measure whilst the new school is being commissioned and built. The temporary classroom will be secured via CIL payments as it is classified as an extension to an existing school as advised in the Council's CIL 123 list.

Having regards to the above, the County Council is suggesting that the district council considers a suitably worded planning condition restricting the occupancy of the proposed dwellings in all of the 6 applications submitted in Thurston (5 applications and this application which is at appeal) until works on the new primary school has commenced to make sure that the necessary infrastructure is in place to meet the needs of the new residents and to ensure that the temporary classroom does not become a permanent fixture.

The Obligations Manager has also noted that there are currently 3 pre-school establishments in the locality and that spare capacity between them is only 10 spaces. As there will be insufficient capacity in the locality, it is suggested that a contribution of £66,664 is given to provide pre-school places in conjunction with the new primary school. As is the case with school provision, the Council's CIL 123 list does not provide for new pre-schools, only extensions to existing facilities. Therefore this contribution is requested under S106 of the planning act and is broken down as follows:

| | Minimum number of eligible children: | Required: | Cost per place £ (2016/17): |
|--|---|------------------|------------------------------------|
| | | | |

| | | | |
|-----------------------------------|-----------|----------|--------------|
| Pre-School age range, 2-4: | 18 | 8 | 8,333 |
|-----------------------------------|-----------|----------|--------------|

Required pre-school contributions: £66,664

Total contribution for permanent pre-school and primary school education provision - £828,783

Secondary school provision

The Obligations Manager has commented that secondary and 6th form provision in the area is currently sufficient to accommodate the additional pupils who will be generated from this proposal and as such, no contributions are required.

A contribution of £37,800 towards library provision will also be requested in relation to this proposal via the Council's CIL 123 list.

SCC Flood and water management – Advises that they wish to provide the same comments as they have for the duplicate planning application 2797/16. Their comments for that application are summarised as follows:

They initially objected to the scheme, but following the submission of additional information from the applicant, they no longer object to the application subject to the imposition of conditions dealing with flood risk matters.

The SCC Flood Management Team has been asked to comment on the cumulative impact of 827 houses being proposed in Thurston and they have commented that they would expect all of the developers to design suitable sustainable drainage systems (which they all have). All of the 5 sites are in a flood zone 1 so they comply with national policy requirements. However, surface water drainage has historically been an issue in Thurston with soil conditions not being viable for water to drain away easily. Most of the surface water from the village is drained into the foul sewer system with the east part of the village having a surface water drainage system. It is understood that Anglian Water are considering options to improve capacity in the locality to help to prevent the flood events that have happened in the centre of the village in recent years.

SCC Landscape Officer: The same comments as provided for the earlier application 2797/16 applies to this proposal. The applicant has submitted the amended LVIA from the earlier application with this proposal and as such the comments made of no objection by the Landscape Officer still applies.

Anglian Water – They have stated that the development is in the Thurston Water Recycling Centre catchment area and there is available capacity for the wastewater flows that will arise from this development. They have also confirmed that there is capacity in the sewerage system for the flows that will arise from this development. As such, they do not raise any objections to this proposal.

Ecology (Essex Place Services) – Does not raise any objections to this scheme as the applicant has considered the impact of the proposal on both protected and priority species and the impact of the scheme can be controlled by conditions.

Environment Agency – Has considered the cumulative impacts of all 6 submitted major application for residential developments in Thurston on flood risk and they have advised that none of the application sites lie within an environmental constraint that is in their remit. They have advised that according to their records, the Thurston Water Recycling Centre should have sufficient capacity to deal with foul water disposal for all of the 827 dwellings currently proposed across all 5 sites. They have advised that Anglian Water should be contacted about fresh water supply.

Fire Service - County Fire Officer – Advises that they wish to provide the same comments as they have for the duplicate planning application 2797/16. Their comments for that application are summarised as follows:

Does not object to the proposal, but advises that details of the location of sufficient fire hydrants to make the development safe must be submitted. This can be covered by a planning condition.

Highways England – Do not raise any objections to this scheme.

Historic England – They have advised that they wish to provide the same comments as they have for the duplicate planning application 2797/16. Their comments for that application are summarised as follows:

They initially objected to the scheme on the grounds that insufficient information had been submitted to allow the impact on the setting of the listed Manor Farm and Church of St Peter to be assessed. The applicant subsequently provided this information and Historic England consider that the proposed development in the vicinity of the grade II listed Manor Farm House and the parish church of St Peter could result in harm to the significance of the historic buildings in terms of paragraph 132 of the NPPF. They comment that as required by paragraph 134 the Council should weigh any public benefit delivered by the development against such harm when seeking the 'clear and convincing' justification required by the NPPF. They advise that if the area to be left undeveloped in the north eastern corner of the site could be beneficial to the setting of Manor Farm House if it is suitably planted and suggest that a similar landscaping belt along the whole northern edge of the site might also mitigate, but not wholly remove the harmful impact.*

Natural England – Does not have any comments to make on this application.

Network Rail – Network Rail – They have been consulted on the cumulative impact of building 827 new dwellings in Thurston on the railway station and the local railway network as requested by the local community. They state that the main issue is the Barrow Level Crossing at Thurston station which has historically seen a number of safety issues associated with it and the level of usage which would arise from the erection of the number of dwellings proposed would have a severe impact on safety unless mitigation measures are

introduced. They indicate that their preferred option is to close the level crossing and replace it with a new pedestrian ramp from platform 1 (upside) down the embankment leading onto Beyton Road. This design will also need to include a drop off point/layby for vehicles along Beyton Road. They have advised that the cost of the works amount to £1million and should be shared proportionally amongst the developers. They are seeking this through a S106 agreement.

When questioned, Network Rail has made it clear that the works that they propose to the crossing point at Thurston Station are directly related to the impact of the 5 planning applications and the 827 houses that would be built. They have advised that the other works that they propose to close crossing points elsewhere on the same line are minor in nature and cannot be compared to this site as the other crossing points are not facing unprecedented levels of pedestrian use which would be generated from the proposed housing in Thurston.

NHS/Primary Care Trust – There are two doctor’s surgeries within a 2km distance catchment area of the application site and neither practice has sufficient capacity for the additional growth coming from this development and the cumulative growth from the area. These surgeries are the Mount Farm Doctors Surgery in Moreton Hall and the Woolpit Health Centre in Woolpit. The NHS recommends that for this proposal funding should be provided towards the phase 2 extension plan for the provision of increased capacity at the Woolpit Health Centre. The amount of the required financial contribution has not been specified at this moment in time and will be secured via CIL once growth levels in the Thurston area are known.

Ramblers Association – States that the path will become another “manufactured path” and lose its natural appeal.

Suffolk Constabulary - Police Architectural Liaison – They have not responded in relation to this proposal. However as this scheme is identical to the earlier application it is considered that their comments are still applicable. The earlier comments are as follows:

Raises concerns about the permeability of the scheme which could provide opportunities for crime. Supports the extension of the 30mph speed limit along Norton Road towards Church Road in the interest of safety.

Suffolk Preservation Society: They have not responded in relation to this proposal. However as this scheme is identical to the earlier application it is considered that their comments are still applicable. The earlier comments are as follows:

They have advised that they have carried out a desk top survey earlier on in 2016 and considered that the site was a sustainable location having regards to its proximity to transport networks and services. They also agree with the applicant’s assessment that the proposal will not result in harm to the setting of the grade II listed Manor Farm in that it is heavily enclosed by vegetation and that its isolation which contributes to its setting will not be harmed by this proposal. It is also noted that the part of the site closest to the listed Church will remain undeveloped and landscaped which will help to preserve its setting. They have also reviewed the amended plans and have commented that in their*

opinion, scheme should be supported.

Representations

8. 23 letters in total have been received making comments on this scheme.
9. The objections to the scheme are as follows:

Policy considerations

- The proposal is on the edge of the village and lies outside the settlement boundary for the village and is contrary to the adopted development plan for the district.
- Until the Council can determine the number of new houses that it needs in a new style local plan, no new development should take place in Thurston.
- No development should be determined until the Neighbourhood Plan is adopted.
- Development should be on brownfield land and not greenfield land such as that proposed.
- Alternative sites within the village should be considered first before this one. These include development at Thurston Granary which would provide the housing numbers, the development near the Community College would resolve the school situation and there are less highway issues with the Barton Road application.

Landscape issues

- The scheme will have a negative impact on the beauty of the surrounding countryside.

Flooding

- The impact of flood risk on the surrounding properties will be greater than stated in the applicant's report.

Highway safety

- The local roads are inadequate and dangerous to cope with so many new dwellings and the proposal will put additional strain on the A14. The extra traffic will also degrade the poorly maintained road surface even further.
- The railway station has poor parking. Additional residents from this site using the railway station to access places such as Bury St Edmunds will increase the parking issues experienced.
- There are no pavements from the site onto Norton Road, Meadow Lane or onto Sandpit Lane which will cause pedestrian safety issues.
- Disagree with the fact that the access onto Norton Road has been deleted. It should have been retained. This will now cause a greater safety problem on Sandpit Lane where the single access to cater for the whole development is proposed.
- The applicant's travel plan is not fit for purpose.
- Thurston is already severely congested at peak times and allowing a further

175 houses will make this significantly worse.

- The highway layout of the site is torturous and will cause issues for the residents and for deliveries and refuse collections.

Infrastructure

- Will a new GP surgery be part of this scheme as local residents have to go out of Thurston at present to access this facility and those facilities are at capacity at the moment.
- This development will place an excessive demand on the infrastructure of the area which will need to be resolved before any of the houses could be built.
- This scheme will also impact on local infrastructure outside the village, such as the Police service, Ambulance etc.

Impact on the amenity of the area

- The erection of 2.5 to 3 storey houses will be out of keeping with the local environment as there are none in the locality. There needs to be a height limit imposed on the dwellings if this scheme is approved to ensure that they are no higher than the existing surrounding properties.
- The estate will not integrate well into its surroundings and there will not be a need for anybody to go through it other than the people who live there.
- The proposal will increase car ownership and hence pollution levels in the area which are already high due to its close proximity to the A14.

Impact on residential amenity

- The erection of new houses in close proximity to existing houses will cause loss of privacy and overlooking over gardens.
- The new dwellings will cause increased light pollution to the surrounding existing properties to the detriment of the living conditions of the occupiers.
- The new dwellings will increase noise levels to the detriment of the living conditions of the surrounding properties.
- The site is polluted and this has not been addressed by the developer and it could cause impact to the health of the new residents.

Impact on designated heritage assets

- The proposal will have a negative impact on the setting of listed buildings in the locality. As Historic England has objected, then surely this application should be refused.

Impact on wildlife in the locality

- The scheme will impact on wildlife in the locality particularly birds.

Other issues

- There is a footpath that runs through the site and this will be lost as part of this scheme.
- There is poor broadband in the village. Building houses there will make it worse.
- Mobile phone signals in the area are poor and the building of additional houses will make this work.
- Wants to know when the Council will announce how many houses Thurston is supposed to take as part of the new local plan.
- Why is there a second application? Is the applicant trying to play the system?

- There is a need for bungalows in the area and not 2.5 to 3 storey houses as shown in the application plan.
- If we have to have dwellings in Thurston, they should be on the southern side of the village as that is closer to the A14 and cause less traffic issues.
- The houses on the site will overlook the

Cumulative Impacts

- The 5 sites in Thurston should be considered cumulatively and not singularly due to their linked impacts.
- 827 houses are proposed and have concerns that there will be insufficient water supply and sewage capacity in the system to cope with them all.
- There are too many houses proposed particularly when you take into account all of those in Bury St Edmunds which is only a short distance away from Thurston.

The Site and Surroundings

10. The application site lies in the village of Thurston which has a population of approximately 3200 people (2011 census) with the site extending to an area of 11.2 hectares of Grade 3b agricultural land. The land is generally flat but falls towards the road in the northeast. The northern boundary of the site is onto Norton Road, the eastern boundary is on Church Road, the southern boundary adjoins residential properties (mixture of single and two storey) and the western boundary front onto Sandy Pit Lane.
11. The site abuts the retained settlement boundary for Thurston but still remains as countryside for planning purposes.

The Proposal

12. Please note details of the proposed development including plans, application documents and appeal documentation can be found online.
13. This proposal has been brought before the committee as the applicant Hopkins Homes has appealed to the Planning Inspectorate (PINS) on the basis of the non-determination of this planning application within the statutory 13 week period for major planning applications.
14. Part of the appeal process requires the Council to provide a statement of case to PINS and to do this on an appeal for non-determination requires officers to ask the members how they would have considered the case if they had received it to make a decision. This is a 'minded to decision' to inform how the appeal should be defended by officers.
15. In this appealed application, outline planning application is proposed for the erection of up to 175 dwellings with all matters reserved except the vehicular access into the site.
16. The applicant has submitted plans showing a suggested layout utilising a single spine road through the site with various secondary streets leading through to the dwellings. The layout shows the retention of and strengthening of the hedge boundary on southern part of the site and also on part of the northern boundary of

the site. The most eastern part of the site, which is most visible from the surrounding open countryside is to be retained as open land and will accommodate the retaining ponds for the surface water drainage for the site. However, these plans are indicative and the layout as shown may change at the reserved matters submission stage. The indicative layout gives a density of approximately 24 dwellings per hectare.

17. This application is identical to application 2797/16 which Hopkins Homes originally submitted for this site. That application is currently undetermined as is under consideration by the Council.

Appellant's grounds for appeal

18. In making their appeal, the appellant must give their grounds as to why they have appealed and what their case will be. Hopkins have stated that their case should be considered on the following grounds:
 - The site can be considered on its own merits without the need to consider the other 4 major housing applications currently in with the Council at Thurston.
 - The Council does not have a 5 year supply of Housing and the proposal will contribute between 40 and 50 new dwellings per year over the next 5 years which will help to reduce the deficiency.
 - Thurston is still being promoted as a Key Service Centre by the Council where growth is encouraged and this scheme is well suited there.
 - The proposal will provide policy compliant number of affordable housing and also smaller properties and bungalows within the market housing to meet the needs identified by the local residents.
 - It will provide recreational facilities and be well linked to the rest of the village by new pedestrian links.
 - Existing trees and hedges will be retained.
 - The residents of the new scheme will help to sustain and potentially allow for the expansion of local services.
 - It will provide pre-school provision.
 - Provision of increased GP and medical capacity at the Woolpit Surgery.
 - Improvement of library services in the area.
 - The development will not increase flood risk in the locality.
 - No objections have been received from the Landscape Officer to the scheme.
 - The proposal causes less than substantial harm to the nearest listed buildings and the benefits that the scheme brings will outweigh this harm.
 - Issues relating to biodiversity can be overcome by suitable conditions as suggested by the Council's Ecology Officer.
 - The trees within the site that are to be removed are of limited value as agreed with by the Council's Tree Officer.
 - Land contamination issues have been dealt with to the satisfaction of the Council's Environmental Health Officer.
 - Will provide an extension to the local school to meet pupil needs that arise from this development.
 - All highway matters raised in terms of the site and the surrounding network have been resolved to the satisfaction of the highway Authority.
19. In conclusion they make the case that all issues have been suitably resolved with all consultees and as such, this proposal can be considered on its own merits ahead of the other developer applications for residential development in Thurston.
20. However, since the submission of the appeal and as a consequence of negotiations

with the Council over the cumulative impact of this scheme and the others currently before the Council in Thurston, the appellant has now agreed to alter their stance on the appeal and are now agreeable to the requirements of the County Highway Authority for contributions towards improvements to key junctions and highway infrastructure in Thurston. They have also changed their stance on education as they are now agreeable to contribute with the other developers in Thurston towards the provision of a new primary school rather than their original stance of only contributing towards extending the existing school which the education authority advised was not possible due to a lack of developable space at the setting.

NATIONAL PLANNING POLICY FRAMEWORK

21. The National Planning Policy Framework (NPPF) contains the Government's planning policies for England and sets out how these are expected to be applied. Planning law continues to require that applications for planning permission are determined in accordance with the Development Plan unless material considerations indicate otherwise. The policies contained within the NPPF are a material consideration and should be taken into account for decision-making purposes.

The following parts of the NPPF are considered to be applicable to this scheme:

- Para 6: Achieving sustainable development
- Para 7: Three dimensions to sustainable development
- Para 11 – 15: The presumption in favour of sustainable development
- Para 17: Core planning principles
- Para 32 and 34: Transport movements
- Para 47: Delivering a wide choice of high quality homes (including the need to have a 5 year deliverable supply of housing)
- Para 49: All housing proposals should be considered in the context of the presumption in favour of sustainable development.
- Paragraph 55: To promote sustainable development in rural areas.
- Para 56 & 60: Requiring good design
- Para 64: Development of poor design must not be supported.
- Para 69: Promoting healthy communities
- Para 70: Delivery of social, recreational and cultural facilities that the community needs.
- Para 72: Provision of school places.
- Para 73: Access to high quality open space.
- Para 75: Protection and enhancement of public rights of way.
- Para 100: Development and flood risk
- Para 103: Development and increasing flood risk elsewhere
- Para 109: Planning system should contribute to and enhance the natural and local environment.
- Para 112 & 117–119: Development affecting protected wildlife
- Para 123: Planning and noise.
- Para 125: Planning and darker skies.
- Para 128 & 129: Describing the significance of a designated heritage asset.
- Para 131: Determining planning applications that affect heritage assets.
- Para 132: Significance of heritage assets.
- Para 134: Development and less than substantial harm
- Para 186: Approaching decision taking in a positive way.
- Para 187: Local Planning Authorities should find solutions rather than problems in decision taking.
- Para 196: Plan led planning system.

Para 197: Assessing and determining application applying the presumption in favour of sustainable development.

P203 -206 – Planning conditions and obligations.

Para 211 - 212: Using development plans and the NPPF in decision making.

Para 214 – 215: The weight attached to development plan policies having regards to their consistency with the NPPF.

Para 216 – Weight given to policies in emerging plans

CORE STRATEGY

22. Core Strategy Focused Review

FC1 – Presumption in favour of sustainable development.

FC1.1 – Mid Suffolk’s approach to delivering sustainable development

FC2 – Provision and distribution of housing.

23. Core Strategy

CS1 – Settlement hierarchy

CS2 – Development in the countryside & countryside villages

CS4 – Adapting to climate change.

CS5 – Mid Suffolk’s environment

CS6 – Services and infrastructure

CS9 – Density and mix

NEIGHBOURHOOD PLAN / SUPPLEMENTARY PLANNING DOCUMENTS /AREA ACTION PLAN

24. In 2013 Thurston received a neighbourhood plan designation and the settlement is currently working on its new neighbourhood plan. The plan is however at an early stage and as yet does not have any policies which could be used in the assessment and consideration of this proposal.

SAVED POLICIES IN THE LOCAL PLAN

GP1 – Design and layout of new developments

HB1 – Protection of historic buildings

HB13 – Protecting ancient monuments

HB14 – Ensuring that Archaeological remains are not destroyed

H3 – Housing developments in villages

H13 – Design and layout of development

H15 – Development to reflect local characteristics.

H16 – Protecting existing residential amenity

H17 – Keeping new development away from pollution

CL8 – Protecting wildlife

CL11 – Retaining high quality agricultural land

T9 – Parking standards

T10 – Highway consideration in developments

RT4 – Amenity open space and play areas within residential development

RT12 – Footpaths and bridleways

SB3 – Retaining visually important landscapes

Main Considerations

25. From an assessment of relevant planning policy and guidance, representations received, the planning designations and other material issues the main planning considerations considered relevant to this case are set out including the reason/s for the decision, any alternative options considered and rejected. Where a decision is taken under a specific express authorisation, the names of any Member of the Council or local government body who has declared a conflict of interest are recorded.
26. The following are identified as the main considerations in assessing this application:

The Principle Of Development

27. The National Planning Policy Framework (NPPF) requires Councils to identify and update, on an annual basis, a supply of specific deliverable sites sufficient to provide for five years worth of housing provision against identified requirements (paragraph 47). For sites to be considered deliverable they have to be available, suitable, achievable and viable.
28. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five year supply of deliverable housing sites (as stated in paragraph 49 of the NPPF). Where policies cannot be considered up-to-date, the NPPF (paragraph 14) cites the presumption in favour of sustainable development and states that planning permission should be granted unless i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or ii) specific policies in the NPPF indicate development should be restricted.
29. The precise meaning of 'relevant policies for the supply of housing' has been the subject of much case law, with inconsistent results. However last month, the Supreme Court gave judgment in a case involving Suffolk Coastal District Council which has clarified the position. The Supreme Court overruled earlier decisions of the High Court and the Court of appeal in this and other cases, ruling that a "narrow" interpretation of this expression is correct; i.e. it means policies identifying the numbers and location of housing, rather than the "wider" definition which adds policies which have the indirect effect of inhibiting the supply of housing, for example, countryside protection policies. However, the Supreme Court made it clear that the argument over the meaning of this expression is not the real issue. The absence of a five year housing land supply triggers the application of paragraph 14 of the NPPF. In applying the 'tilted balance' required by this paragraph, the Council must decide what weight to attach to all of the relevant development plan policies, whether they are policies for the supply of housing or restrictive 'counterpart' policies such as countryside protection policies.
30. In accordance with National Planning Policy Guidance paragraph 030 (Reference ID: 3-030-20140306) the starting point for calculating the 5 year land supply should be the housing requirement figures in up-to-date adopted Local Plans. It goes on to state that '*...considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light....Where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints...*'

31. The Council published the Ipswich and Waveney Housing Market Areas Strategic Housing Market Assessment (SHMA) in May 2017 which is significant new evidence for the emerging Babergh and Mid Suffolk Joint Local Plan. Therefore, the 5 year land supply has been calculated for both the adopted Core Strategy based figures and the new SHMA based figures. For determining relevant planning applications, it will be for the decision taker to consider appropriate weight to be given to these assessments and the relevant policies of the development plan.
32. A summary of the MSDC 5 year land supply position is:
- i. Core Strategy based supply for 2017 to 2022 = 3.9 years
 - ii. SHMA based supply for 2017 to 2022 = 3.9 years
33. The NPPF requires that development be sustainable and that adverse impacts do not outweigh the benefits to be acceptable in principle. Paragraph 7 of the NPPF sets out three dimensions for sustainable development, economic, social and environmental:
- "an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure:*
- a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*
- an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."*
34. In light of all of the above, this report will consider the proposal against the three strands of sustainable development, and also give due consideration to the provisions and weight of the policies within the development plan, in the context of the authority not being able to demonstrate a 5 year land supply.

Sustainability of the Proposal (including assessment against the development plan and the NPPF)

35. The NPPF provides (para 187) that *"Local planning authorities should look for solutions rather than problems, and decision-takers at every level should seek to approve applications for sustainable development where possible. Local planning authorities should work proactively with applicants to secure developments that improve the economic, social and environmental conditions of the area."*
36. The Parish Council and some of the objectors have commented that this scheme should be refused as it is outside the development limits for Thurston in line with the policies as contained in the adopted Core Strategy and Local Plan. However, it is clear on reviewing the guidance in the NPPF as outlined above that this cannot be the case as housing delivery policies CS1 and CS2 of the core strategy should not be considered to be up-to-date along with policies such as H7 of the Local Plan as the Council does not have a 5 year supply of housing as required by the NPPF. Other

comments have been received stating that the Council should not consider this application and the others in the Thurston area until the Council determine in a new style local plan its stance on the location of new housing in the district. However, national policy as contained in the NPPF does not give the Council this option and requires all applications to be determined promptly.

37. The contents of paragraph 55 of the NPPF are also considered to be material in the making of a decision on this case. Objections have been received stating that this proposal should not be allowed as it is outside the settlement limit for Thurston and that the site should be considered as countryside. Paragraph 55 of the NPPF makes it clear that Councils can no longer consider sites that are adjacent or near to a settlement limit to be unacceptable simply because they are the wrong side of the line. It now makes it clear that 'new isolated homes in the countryside will not be supported and that Councils are encouraged to promote sustainable development in rural areas by considering housing development in locations where they could enhance or maintain the vitality of rural communities. It gives an example in paragraph 55 that new housing could provide increased facilities in one settlement which would be of benefit to it and the other surrounding settlements.
38. Having regards to the above, it is considered that the application site is not in an isolated location as it is adjacent to the built up part of the village, and the scheme will bring with it contributions towards local infrastructure which will be of benefit to the residents of Thurston and the surrounding villages. Therefore, in terms of paragraph 55 of the NPPF, this proposal could be considered to promote sustainable development in a rural area. However, having regards to the fact that the Council does not have a 5 year supply of housing and has to balance the negatives of the scheme against the positives that it brings in line with the requirements of the NPPF, consideration of whether the scheme will be supported as sustainable development or not will be given in the conclusion to this report.
39. In reaching a decision, paragraph 47 of the NPPF is a material consideration and requires Local Planning Authorities to boost significantly the supply of housing, by identifying and updating annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land. As stated above, the Council cannot demonstrate a 5 year supply of housing and as such paragraph 49 of the NPPF applies and states that in this situation, the relevant policies for the supply of housing in the Council's adopted plan should not be considered to be up to date and that the scheme remains to be considered under the requirements of paragraphs 7 and 14 of the NPPF which defines what sustainable development is and how decisions should be made.
40. Since the submission of this proposal, four other developers have also submitted application for residential development in Thurston. Bovis Homes have applied for 138 dwellings on land on the west side of Barton Road (4386/16); Persimmon have applied for 250 dwellings plus a new school on land west of Ixworth Road (4963/16); Laurence Homes have applied for 64 dwellings on land at Meadow Lane (4942/16) and Pigeon Capital have applied for 200 homes plus a school on land at Norton Road (5070/16). Including this application, 827 new homes are currently proposed in Thurston.
41. Following receipt of these applications an approach of joint working to explore cumulative infrastructure issues has been agreed between the respective applicants and the District and County Council. This has enabled the constructive exploration of significant infrastructure issues on a collaborative but without prejudice basis to a

consensual timetable. Therefore, as there are unprecedented numbers of new dwellings proposed it is considered that all schemes must be considered both on their own merits and in combination with each other to assess if they meet the tests for sustainable development as outlined in the NPPF.

42. Policy FC1 of the Mid Suffolk District Core Strategy Focused Review states that it takes a positive approach to sustainable development and like in the NPPF, the Council will work proactively with developers to resolve issues that improve the economic, social and environmental conditions in the area. Related policy FC1.1 makes it clear that for development to be considered sustainable it must be demonstrated against the principles of sustainable development. The policy goes on to say that proposals for development must conserve and enhance the local character of the different parts of the district and how it addresses the key issues of the district.
43. The settlement of Thurston is one of the two largest villages in the district of Mid Suffolk (with the other being nearby Elmswell) where a wide range of local services and local infrastructure is provided. Thurston has both a primary and a secondary school, and a number of other local facilities which act as a service to the inhabitants of the village as well as providing employment opportunities. Whilst Thurston does not have a doctor's surgery, there is one in Woolpit and another in Moreton Hall which is a reasonably short journey away either by car or via public transport.
44. Thurston is also unusual in that it has a railway station which provides access for the residents to be able to commute to Ipswich, Bury St Edmunds and further afield without having to use their cars. Thurston is also on a bus route with a number of designated stops within the village. As part of this scheme the applicant is proposing to provide bus shelters outside of the site to ensure that the future residents of the dwellings can access public transport conveniently without having to walk long distances to get to bus stops.
45. In relation to paragraph 7 of the NPPF, the proposals would contribute to building a strong, responsive and competitive economy through the creation of construction and related jobs and the on-going contribution to the local economy from the creation of up to 175 additional households in the area. The proposals would also contribute towards providing the supply of housing required to meet the needs of present and future generations and by having the potential to create a high quality built environment, as well as contributions towards affordable housing, the highway network and other social infrastructure (public open space, education, health care) through a CIL contribution, or where appropriate, a section 106 agreement.
46. It must also be remembered that paragraph 49 of the NPPF makes it clear that housing applications should be considered in the context of sustainable development. The applicant is proposing up to 175 dwellings in this instance and they have confirmed that it is their intention if they get planning permission to commence with work on site as soon as possible following the granting of their reserved matters application. To speed this up, they have agreed to have a shorter period than is usual to submit their reserved matters application (2 rather than 3 years) which helps to justify that as a developer, they are serious about delivering the houses. They have also signed an agreement with Mid Suffolk and Suffolk County Council to work as a group with the other 4 other developers in Thurston to contribute to and work together to achieve the necessary infrastructure within the area to make this and the other 4 schemes sustainable.

47. The Council's Sustainability officer has objected to the scheme on the grounds that detail in terms of the build, orientation and energy efficiency of the dwellings has not been submitted. However, it should be noted that this scheme is in outline form and the applicant does not have to provide this information at this stage. This information can be addressed at the more appropriate reserved matters stage where full technical details of the layout, orientation and finish of the dwellings have to be provided.
48. Consideration of whether this proposal is considered to constitute sustainable development, having regard to the contents of policies FC1 and FC1.2 of the Adopted Core Strategy Focused Review and the contents of the NPPF will be reached in the conclusion to this report.

Site Access, Parking And Highway Safety Considerations

49. Policy T10 of the Mid Suffolk District Local Plan provides criteria on highway considerations when assessing planning applications. This policy requires access points into and out of the site to be safe and an assessment made as to whether the existing local roads can suitably accommodate the impact of the proposal, whether adequate parking and turning spaces exist within the site and that the needs of pedestrians and cyclists have been met. This policy is considered to carry significant weight in the determination of this application as it is in compliance with paragraph 32 of the NPPF which requires all schemes to provide safe access for all.
50. A number of objections have been received to the scheme on the grounds that the use of a single access point into the site would be detrimental to highway safety and that the local road network is unsuitable for a development of up to 175 dwellings. Mention has specifically been made that some local junctions are unsafe at present (see Parish Council objection for details as well as the Local Highway Authority's consultation response), particularly those adjacent to the railway bridge to the south of the village and that this scheme on its own and when considered with the 4 other schemes currently before the Council will exacerbate this problem as more vehicles will be using these junctions to access local roads, particularly the A14 to reach other destinations further afield. Comments have also been received that this scheme cumulatively with the other 4 schemes that have been submitted in Thurston for residential development will cause a significant and severe impact on the road network in the locality.
51. The site is located to the north east of the village with Sandpit Lane bordering the site to the west and Norton Road to the north. This proposal originally showed two access points; one off Norton Road and a second off Sandpit Lane. The Local Highway Authority originally objected to this layout, on the grounds that the access off Norton Road was not safe and could not be altered to be made safe. They also commented that the proposal lacked a footpath link from the existing part off Church Road to the edge of the site and that the above was contrary to paragraph 32 of the NPPF which requires safe access for all. The applicant has subsequently amended the scheme in line with the comments made by the Local Highway Authority
52. The Local Highway Authority has considered the cumulative impact of this proposal on the highway network in Thurston and they have come to the conclusion that the

impact of the 5 scheme if they all come forwards will be severe. However, they have made it clear that the NPPF requires all public bodies to try and resolve problems and they are confident that if all 5 developers work together those suitable and cost effective alterations can be made to the highway network to ensure that the impact does not constitute a severe one. The highway officer has assessed the road network and has suggested alterations and improvements to key areas of it (see the Local Highway Authority's consultation response earlier in this report for more information) which all 5 developers have been asked to contribute towards through either a section 106 agreement or through the Highways Act. All 5 developers which include Hopkins Homes have agreed to contribute towards the works as requested by the Highway Authority. For the Hopkins proposal, the Highway Authority is requesting £94,724 via a S106 agreement (with travel plan contributions being in addition to this), a further £72,333 under section 278 of the Highway Act and a further £30,000 under section 38 of the Highway Act. As such, this proposal no longer fails the requirements of paragraph 32 of the NPPF when considered cumulatively with the other 4 residential schemes as the impact with the alterations carried out to the highway network will no longer be severe.

53. The Local Highway Authority identify that the scheme will offer sustainable travel options to local residents as additional pavements and bus shelters are proposed and these will link up to both existing facilities and those proposed on neighbouring sites by the other developers seeking at the moment to build houses in Thurston. This will help to improve accessibility on foot and via public transport and will ensure that the site is accessible to the local railway station.
54. An objection has been received to this scheme on the basis that the applicant's travel plan is not fit for purpose. They have commented that all it does is show bus and railway timetables in the locality. By their very nature, travel plans do as much as they can to encourage sustainable forms of transport to encourage the occupiers of the properties to use other options than their own cars. The travel plan has been reviewed by the Local Highway Authority and they have not objected to it or asked for it to be altered. The Local Highway Authority is also recommending that the applicant is obligated via a S106 agreement to provide the travel plan to ensure that there are sustainable transport options available to the new residents of the scheme rather than just having to rely on their private cars to access local facilities.
55. A further objection has been received on the grounds that the passenger accommodation on the local train network is inadequate for the existing number of passenger users and the approving of this and other schemes in the locality will make matters worse. The objector suggests that the applicant of this scheme should pay towards improvements to the local railway network.
56. Network Rail has been consulted on this proposal and also the 4 other sites within Thurston and their view has been sought as to the impact of the delivery of the application site and the other 4 sites (a total of 827 houses) on the local railway network. They have not asked for a contribution to improve passenger services or the railway accommodation in Thurston, but they have advised that they have assessed the railway crossing in Thurston and the impact of 827 new houses on it would be severe in terms of the safety of the railway users. Network Rail has asked for a contribution of £1million split proportionally between all 5 developers with proposals in Thurston to close the existing level crossing and to provide new and safer facilities in its place (see Network Rail consultation response for full details). Network Rail

has the ability to bid for this money under the Council's CIL scheme as the 123 list allows for improvements to passenger services to allow this work to go ahead.

57. It is of merit to also note, that a public right of way runs along the eastern end of the site and is to be incorporated into the green open part to the eastern end of the site and is not to be lost as referred to by some of the objectors to the scheme. Having consulted with the County Public Rights Of Way (PROW) Officer, it is noted that no objections have been received in relation to this aspect of the scheme.
58. Having regards to the above, it is considered that the proposal complies with the requirements of policy T10 of the local plan and paragraph 32 of the NPPF, in that safe and suitable access for all people can be achieved and that improvements can be undertaken to the local highway network to improve traffic safety and flow and to provide greater opportunities for the use of non-motorised modes of transport to access local facilities. As the application is in an outline form, the indicative layout shows that a suitable internal layout, which would be up to the County Council's highway standards, could be provided at reserved matters stage.

Design And Layout [Impact On Street Scene]

59. Section 7 of the NPPF refers to design. Specifically, paragraph 56 states that good design is a key aspect of sustainable development; it should contribute positively to making places better for people. Decisions should aim to ensure that development will function well and add to the overall quality of the area, establish a strong sense of place, create attractive and comfortable places to live, work and visit, optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks. Furthermore it provides that development should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The NPPF goes on to state it is "proper to seek to promote or reinforce local distinctiveness" (para 60) and permission should be "refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions" (para 64). In addition policy CS5 provides that "*All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area*" and echoes the provision of the NPPF.
60. Objections have been received stating that the site is currently an open field and that dwellings of the scale and density of the proposal, particularly in reference to the indicative plans to build of 2 to 3 storey dwellings on site is considered to be inappropriate and not in keeping with the locality.
61. The application is in outline form and the plans as submitted provide an indicative layout of how the scheme could potentially look should this outline planning application be approved which relates to the principle of the development of the site. The area to the west and to the south of the site is residential in character. The dwellings to the west that border Sandpit Lane are modern predominantly two storey properties with the properties that run along the southern boundary of the site being a mixture of single and two storey properties again of relatively recent design and construction. The applicant has indicatively shown a layout which is considered to be in keeping with the residential character of the area and this can be altered to take on the concerns of any consultees and local residents at the reserved matters stage.

Furthermore, the density of the scheme at approximately 24 dwellings per hectare is low and appropriate to its location and does not reflect the comments of the objectors who consider this scheme to be high density.

62. Having regards to the above, it is considered that the scheme in terms of its suggested layout constitutes good design in line with the requirements of the NPPF and local policy CS5 as it proposes a form of development that would reflect the character and appearance of the surrounding streetscape.

Parish Plan / Neighbourhood Plan

63. A Neighbourhood Plan designation was confirmed in 2013 and covers the Parish of Thurston. At the time of the consideration of this proposal the parish have set up a neighbourhood Plan Committee to prepare the policies for the new Neighbourhood Plan. Both the Parish Council and their Neighbourhood Plan Committee have objected to this scheme with the latter raising objections based on some of the early work that they have carried out for the evidence base for the new plan.
64. The Planning Practice Guidance identifies that *“Paragraph 216 of the National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan. The consultation statement submitted with the draft neighbourhood plan should reveal the quality and effectiveness of the consultation that has informed the plan proposals. And all representations on the proposals should have been submitted to the local planning authority by the close of the local planning authority’s publicity period. It is for the decision maker in each case to determine what is a material consideration and what weight to give to it”*.
65. As such, whilst it is ultimately for Members to determine the weight that should be given to the plan, whilst it is at an early stage in its development, it is the view of Officers that little material weight can be given at this time.

Landscape Impact

66. Paragraph 58 of the NPPF states that proposals should provide appropriate landscaping to ensure that they integrate well into the surrounding locality. This requirement is repeated in one of the requirements of policy H13 of the Mid Suffolk District Local Plan. It is proposed to retain and strengthen the hedging on the southern part of the site and also part of the site from the dwelling on Norton Road down to the part where the existing public footpath runs through the site. The most eastern part of the site, which is bordered by Norton Road and Church Road, is the most visible from the surrounding open countryside and which would cause most harm to the surrounding countryside if developed. The indicative plans show that this is to remain undeveloped and act as an attractive green buffer between the scheme and the surrounding open countryside.
67. Objections have been received to this proposal on the grounds that the site lies in an exposed location and that the approval of this scheme will erode the intrinsic beauty and the character of the surrounding open countryside and that the proposed

landscaping will take a considerable amount of time to mature to mitigate this impact. The County Landscape Officer has been consulted on this scheme and following the submission of the amended plans he has not raised any objections to this scheme. He acknowledges that it will change the character and appearance of the surrounding open countryside, but with suitable landscaping and the provision of the green open space on the eastern side of the site its impact will be minimised both in the medium and longer term.

68. Having regards to the requirements of policy H13 of the MSDC Local Plan and paragraph 58 of the NPPF, it is considered that the scheme provides substantial landscaping both within and on the boundaries of the site to ensure that it assimilates well into the rural edge of Thurston and provides an attractive environment both for the new residents of the site and those living in the surrounding locality.

Residential Amenity

69. Policies within the adopted development plan require, inter alia, that development does not materially or detrimentally affect the amenities of the occupiers of neighbouring properties. This requirement is emphasised in the NPPF Core Values in paragraph 17 where it states that all schemes should seek a good standard of amenity for all existing and future occupants of land and buildings.
70. Objections have been received to this scheme on the basis that the dwellings running along the southern part of the site will be too close and have a negative impact on the living conditions of the occupiers. It has been noted from the site visit, that many of the properties that face north into the site on Sandpit Drive, Victoria Close and Oakfield Road have a number of windows that face into the field with a number of them not having their own boundaries between the field and their gardens and relying on the hedgerow, which is sparse in places as the boundary.
71. However, the application is in outline form with the layout plan only being indicative. The indicative plan shows the dwellings along the southern buffer of the site being separated from the existing dwellings by the estate roads and the hedging along the site boundary being strengthened. It is considered that at reserved matters stage that a suitable layout can be drawn up which would not have a negative impact on the living conditions of the surrounding neighbouring occupiers in terms of loss of privacy and residential amenity.
72. Objections have also been received on the grounds that the new dwellings will increase noise levels in the locality and also impact on the darkness of the sky due to increased lighting. The proposal is for residential development and the developer will be expected at reserved matters stage to design and site the dwellings so as to minimise the impact on the surrounding existing local residents. The application site is a field at the moment and the erection of dwellings with associated private and public lighting will alter the outlook received by the existing residential occupiers. Noise from the residents living in the new properties will also differ to the noise currently experienced from the field. However, it is not considered that lighting and noise from the proposed dwellings would be so excessive to significantly affect the living conditions of the surrounding occupiers to necessitate this appeal to be dismissed on that ground.
73. It is considered that this proposal does not give rise to any concerns of loss of neighbour amenity by reason of noise, lighting, form, design, the distance between the dwellings and the substantial landscaping that is proposed along the periphery of

the site and as such the proposal meets the relevant NPPF core value in paragraph 17.

Environmental Impacts - Ecology And Land Contamination

74. The application site is a grade 3b agricultural parcel of land which is adjacent to the built up part of Thurston. As the site is in an agricultural use, there is limited tree cover within the site with the majority of the trees and hedging being along the field boundaries.
75. Objections have been received to this scheme on the basis that the loss of the field to create residential development will have a negative impact on animal species, particularly protected species in the locality.
76. Regulation 9(5) of the Conservation of Habitats and Species Regulations 2010 (Implemented 1st April 2010) provides that all "competent authorities" (public bodies) to "have regard to the Habitats Directive in the exercise of its functions." In order for a Local Planning Authority to comply with regulation 9(5) it must "engage" with the provisions of the Habitats Directive.
77. The content of paragraph 118 of the NPPF is also applicable to the consideration of this proposal, as it states that when determining planning applications, consideration must be given to 6 principles. Two of those principles are particularly relevant to the consideration of this proposal, being;
 - If significant harm is caused which cannot be avoided or mitigated by conditions then planning permission should be refused.
 - Opportunities to integrate biodiversity in and around developments should be supported.
78. The County Ecologist has been consulted on this application and they have commented that as the majority of the site is in agricultural use, it will offer limited habitat for protected species. However, bats have been noted in the locality and she considers that in line with the requirements of the directive above and the contents of paragraph 118 of the NPPF that the scheme can be made acceptable by the imposition of conditions to control aspects such as the impact of street and residential lighting and to ensure that natural features such as the hedgerows around the site are protected during the construction of the scheme to protect habitat. It was also noted that new habitat is proposed as part of the scheme and that a large part of the site to the east is to be retained as open space.
79. An objection has been received to this scheme on the grounds that the land is contaminated and that this has not been considered as part of this application. Paragraph 121 of the NPPF makes it clear that planning decisions should make sure that the site is suitable for its new use taking account the hazards of any previous use. As the site is currently a field, subject to agricultural practices which could have included the spraying of crops with chemicals in the past, and part of the site appears to have been subject to historical landfill waste, a contaminated land report has been submitted to the council for consideration. The Council's Contaminated Land Officer in the Environmental Health team has reviewed the report and has advised that subject to the imposition of conditions, he does not object to the scheme. Therefore, it is considered that it is in compliance with paragraph 121 of the NPPF.

Heritage Issues (The Setting of Neighbouring Listed Buildings)

80. Both the NPPF and Core Strategy place significant emphasis on safeguarding heritage as an important component of sustainable development.
81. With reference to the treatment of the submitted application, the Council embraces its statutory duties and responsibilities in relation to listed buildings, notably the general duties under sections 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 which requires the local planning authority to have “*special regard to the desirability of preserving [a] building or its setting or any features of special architectural or historic interest which it possesses*”.
82. Recent case law on the application of the statutory duty acknowledges that the consideration of the impact of a proposed development on the significance of a designated heritage asset is a matter for its own planning judgement, but that the Local Planning Authority is required to give any such harm considerable importance and weight. However, where special regard to the desirability of preserving heritage assets has been paid and no harm is considered to be posed, the ‘balancing’ of harm (which should be given considerable weight as above) against public benefits as required by the NPPF, is not engaged.
83. Policy HB1 (Protection of Historic Buildings) places a high priority on the protection of the character and appearance of historic buildings, particularly the setting of Listed Buildings.

In paragraph 17 of the NPPF it makes it clear that development should “*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations*”. Para 131 goes on to state that “*In determining planning applications, local planning authorities should take account of; the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.*” Furthermore Para 132 states “*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.*”

84. Objections have been received to this scheme on the basis that the proposal is harmful to the setting of three listed buildings. These being the Church of St Peter which is grade II listed, Manor Farm Barn which is grade II* listed and the converted barns to the north of this building which are grade II listed. Manor Farm lies to the north of the eastern field which forms part of this application and is screened from the site by existing trees to its south which separates it from the field adjacent to Norton Road. The listed converted buildings are further north and are also screened from the field which adjoins them and the site by substantial tree screening. The Church of St

Peter lies to the east of Church Road and is screened from the site by a group of dwellings to the west. However, due to the height of the church, it is visible from the site and from Norton Road.

85. Historic England and the Council's Heritage Officer have been consulted on the application and they both consider that the proposal will cause harm to the setting of these three listed buildings as they are rural based buildings in an open countryside location. Both have identified that the harm will potentially be limited with the result that the proposal must be considered to be less than substantial harm and assessed in line with the requirement of paragraph 134 of the NPPF where the harm needs to be considered and weighed against the wider public benefits that the scheme will bring forwards. It is also worth noting that the Suffolk Preservation Society supports this scheme and considers the impact on the adjacent listed buildings to be minimal if even there is any harm to their settings generated at all.
86. As there are 5 different applications for major housing development in the northern part of Thurston, the Council's Heritage Officer has been asked to consider the cumulative impact of this scheme in relation to the others. Of the 5 applications, the application by Pigeon Capital for 200 homes plus a school on land at Norton Road (5070/16) lies to the north of the Hopkins site and in combination with each other both schemes will have a cumulative impact on the setting of the listed buildings. It is considered that the other 3 sites are too far removed from the listed buildings to cause impact and as such, the Heritage Officer has been asked to consider the cumulative impact of the Hopkins and Pigeon scheme together on the three listed building previously referred to. He has stated that in his opinion the cumulative harm to the Grade II* Listed farm house would not be greater than medium and the harm to the church would be somewhere between low and medium and as such it is up to officers in line with the NPPF to assess if the harm to the listed buildings is outweighed by the public benefits that the scheme brings as outlined in paragraph 134 of the NPPF.
87. In accordance with NPPF paragraphs 129, 132 and 134 in determining this proposal the Council needs to consider whether the identified harm can be avoided or minimised, and whether that harm is outweighed by the public benefits arising from the proposal. It is considered that as the Council does not have a 5 year supply of housing as required by paragraph 47 of the NPPF (the current supply is 3.9 years) and the proposal will help to contribute towards this deficit by providing up to 175 new dwellings. The scheme will also deliver 35% of the dwellings as affordable houses to help to meet the need in the locality and further contributions which cover matters such a new primary school and pre-school facility as well as providing CIL money to facilitate improvements to the doctor's surgery in Woolpit, to the local library and safety improvements at the Thurston Railway Station. The scheme will also contribute towards improvements to the infrastructure of the local area by installing a new pavement and bus shelter on Sandpit Lane and the creation of a new pavement on Church Road to link the site up to the existing pavement within the village. On a more strategic level, the scheme will also contribute towards improvements to the highway network in and around Thurston to ensure that the road network remains safe for its users. The scheme will bring with it public benefits also in the form of construction related jobs and also additional residents to help sustain and grow local services and businesses.
88. The public benefit of this proposal when considered on its own is highlighted above, but when the above is considered cumulatively with the adjacent Pigeon site, which will also deliver additional houses, provide land for a new primary school and

contributions towards the cost of building it, which also including a pre-school and highway infrastructure contributions and also provides CIL money to facilitate bids for library, doctor's surgery and railway station improvements, it is considered that the cumulative benefits of both schemes outweigh the low to medium harm that the proposals will have on the heritage assets identified in this report.

Environment And Flood Risk

89. Paragraph 100 of the NPPF makes it clear that inappropriate development in areas of flood risk should be avoided by directing development away from areas of highest risk. The contents of policy CS4 of the Mid Suffolk Core Strategy is in line with the requirements of the NPPF in terms of flood risk and carries significant weight in the determination of this application. In terms of flooding from rivers, the site complies with local and national policy as it lies in a flood zone 1 area which is land at least risk of flooding. To deal with surface water, the applicant is proposing a pond filled with reed within the north east corner of the site with the surface water flow from the site channelled into it.
90. Objections have been received stating that the site floods to a considerably worse extent than that identified in the Flood risk assessment and that the building of dwellings here will make matters worse for the adjacent existing properties. Anglian Water and the County Flood and Water team have been consulted on this proposal and both organisations have advised that they do not object to the scheme subject to the imposition of a condition requiring additional technical details relating to the submitted drainage strategy.
91. Objections have also been received in relation to this scheme when considered cumulatively with the 4 other sites as currently proposed for residential development in Thurston on the grounds that together they will increase flood risk in the area, there is a lack of water supply to serve the new dwellings, and the sewage system locally has no capacity within it to cope with the extra demand. The Environment Agency, County Flood and Water team and Anglian Water have been specifically asked to consider the cumulative impact of this proposal. They have advised the Council that in terms of flood risk, an increase of 827 dwellings with the mitigation measures proposed by the applicants will not increase flood risk in the locality. Confirmation has also been received that there is capacity in the local pumping station to serve 827 new dwellings in terms of sewage needs. Thurston lies in an area where water supply can be an issue, however Anglian Water has a duty by law to supply new houses with a water supply and this is a matter for them to resolve under their legislation.
92. Having regards to the above, it is considered in terms of flood risk, drainage, water supply and drainage that the scheme when either considered singularly or cumulatively can be made acceptable subject to the imposition of a suitably worded condition to meet the requirements of paragraph 100 of the NPPF and policy CS4 of the Mid Suffolk Core Strategy.

Infrastructure - Planning Obligations / CIL contributions

93. Objections have been received to this scheme on the grounds that the local infrastructure, which includes the local schools and health care, is insufficient to meet the need of the residents of this proposal. Comment has been made that if the scheme is approved without suitable provision, then it will cause significant impact on the existing community of Thurston.

94. The Council has now implemented CIL which accordingly takes on board requirements such as open space contribution, NHS and education contributions.
95. As part of this proposal the following contributions will be sought under the Council's CIL Scheme:
- Towards the phase 2 expansion of the doctor's surgery in Woolpit which the residents of this scheme would use.
 - For improvements to the local library provision.
 - Safety improvements to the Thurston Railway station.
96. Objections have been received to this scheme on the grounds that a new doctor's surgery will not be provided and that the scheme will only provide 'contributions' rather than actual facilities. It should be noted that the Primary Care Trust (PCT) has made it clear that due to the existing situation with doctors, their salaries and contracts and the government's policy in terms of the NHS that a new doctor's surgery will not happen in Thurston as part of any of the 5 schemes. The PCT will be requesting contributions through CIL in relation to all 5 schemes and the monies will be used to improve the service offered and/or improve the facilities at the Woolpit Surgery and at the Park Farm Surgery in Moreton Hall to meet the expected needs of the additional residents of the new dwellings in Thurston.
97. It has been identified following discussion with the County Infrastructure Officer that as suggested by the objectors and the Parish Council, there is no capacity in the local primary school to expand and as such a contribution of £706,477 is required towards the building of a new 420 place two form primary school in the locality. It has also been suggested that a further £66,664 is required for the provision of new pre-school in the locality to help meet the demand generated by this development. As the CIL 123 list does not include the provision of new pre-school or primary school facilities (it only covers extensions to existing establishments) these contributions will have to be sought under S106 of the Planning Act. In the applicant's statement of case, they initially indicated that they would not agree to the payment of this contribution as they considered that the matter could be resolved via a CIL contribution to extend the existing school. However, the appellant has indicated to the Council that they have now reassessed the situation as the County Council has made it clear that due to a deficit of land at the school it cannot be extended as it would fail the Department for Education standards for minimum school sizes (both buildings and land) and an extension would not be allowed.
98. Whilst the new school is being built, it has been suggested that the existing school will be provided with two temporary classrooms funded via CIL to cope on a 2 to 3 year period with the increase in pupils generated from the first phase of new housebuilding in Thurston (from any of the 5 sites currently under consideration) until the new school is built. Once that happens, the existing school will be closed and the existing pupils moved over to the new school and the new school will be extended as appropriate up to a capacity of 420 pupils to accommodate the primary school age children arising from any of the proposed housing sites in Thurston. It is understood that the Diocese who own the primary school have committed to ploughing the capital receipt that they receive for the development of the existing school site into the new school which is also to be funded by a joint contribution by all 5 of the developers proposing major housing schemes currently in Thurston.
99. Following further dialogue with the County Obligations Manager it is understood that progress is being made to secure options on the potential school sites proposed in

other applications. The delivery of a new primary school is a necessary pre-requisite to mitigate the potential pressure on education infrastructure from the development and it has been agreed that a restrictive phasing condition is not necessary given the progress that has been made on options. Nevertheless the securing of a primary school site is a material consideration upon which the delivery of this development is predicated.

100. As is the case for new education buildings, affordable Housing is not part of CIL and members should note that policy to seek up to a 35% provision remains in effect. The applicant has confirmed that he is agreeable to provide a policy compliant scheme for affordable housing and that this will be achieved via a Section 106 contribution.
101. Network Rail has been consulted on this scheme and has asked for a contribution of £1million through a S106 agreement between all five developers to close the existing level crossing and to provide safer and improved facilities at Thurston Railway Station having regards to the increased use of the facilities that will occur from the residents of the proposed 827 dwellings. The Council's CIL 123 list includes provision for improvements to transport infrastructure. As such it is considered that it would be appropriate for Network Rail to bid for the specified amount to make the improvements they have requested to improve pedestrian safety at the station under the CIL scheme.
102. The Local Highway Authority has, as stated earlier in the report, has asked for £94,724 under section 106 of the Planning act to pay for Hopkins Homes contribution for works to the highway infrastructure to ensure that the impact of approving all 5 housing schemes totalling 872 houses in Thurston is not severe on the highway network as referred to in paragraph 32 of the NPPF.
103. It is noted that the applicant has stated in his supporting statement that it is his intention to gift land adjacent to the church for use as an extension site to the existing graveyard. It must be noted that this land is outside the red line site boundary for this application and the provision of this land for an extension to the graveyard is not necessary to make this application acceptable in planning term and as such fails the CIL tests outlined above. However, as stated in the applicant's supporting documents, this land can be gifted to the church regardless of the outcome of this application through other non-planning means.
104. Having regards to the above, in accordance with the Community Infrastructure Levy Regulations, 2010, the obligations recommended to be secured above by way of a planning obligation deed are (a) necessary to make the Development acceptable in planning terms (b) directly related to the Development and (c) fairly and reasonably relate in scale and kind to the Development.

Other Issues

105. Objections have been made to this scheme on the basis that there are a number of other planning applications with the Council at present and some of those should be approved before, or instead of this one and that they should all be considered cumulatively in terms of their impact. It must be remembered that each planning application must be considered on its own individual planning merits. However, the Council is actively considering the cumulative impact of all of the planning applications that have been submitted for residential development in Thurston to ensure that the right quantum of development will be provided and that the necessary infrastructure to accommodate the dwellings is provided.

106. An objection has been made on the ground that the mobile phone signal in the area is poor as is the broadband in the area and that it will get worse with the development of this site. The mobile telephone operators are constantly reviewing their networks and it is likely that when additional dwellings are approved in the locality, they will in the future plan for an improvement to their local mobile network.
107. Comment has been made that the erection of dwellings in close proximity to the graveyard extension that is planned to the west of Church Road will not provide the tranquillity that the families of those buried in the graveyard will expect. The graveyard extension is to be sited adjacent to the landscaping belt for the site and is not adjacent to any proposed residential development. As such, the peace and tranquillity that the objector would expect within the graveyard will be maintained if the proposed scheme is approved and built.

Details Of Financial Benefits / Implications (S155 Housing and Planning Act 2016)

- Council Tax payments from the dwellings when built
- Planning Delivery Grant from Central Government for delivering the dwellings
- S106 Agreement:
 - £706,447 is required towards the building of a new primary school in Thurston.
 - £55,642 towards the cost of the land to provide the new primary school.
 - £66,664 is required for the provision of new pre-school facility in Thurston
 - £94,724 is required for highway infrastructure works
 - 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 longer.
 - Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 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.
- CIL payments per dwelling built on site.

108. PART FOUR – CONCLUSION

Planning Balance

109. In order to provide context this scheme is the subject of a non-determination appeal and the substantive decision now rests with The Planning Inspectorate with a date for Public Inquiry now anticipated in October 2017. In order to present the Councils case appropriately it is necessary to agree the approach that the local planning authority would have been minded to take had the decision remained before them. The recommendation is therefore framed in that manner and the Councils statement of case is required to be presented to a timetable agreed with the appellant. This precludes the opportunity to further explore highways issues at the A143 Thurston Road junction as recommended in relation to those other cases presented contemporaneously.

110. The proposal for residential development on land at Sandpit Lane/Norton Road in Thurston is considered to be contrary to the adopted Mid Suffolk Core Strategy as the application site lies within the countryside outside the built framework of the settlement of Thurston on what is open agricultural land. However, as the housing policies in the Core Strategy are out of date due to the Council not having a deliverable five year supply of housing, this scheme falls to be considered in relation to paragraph 14 and 49 of the NPPF which relate to residential development and sustainable development.
111. Paragraph 14 states that where the development plan for the area is out of date permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole or specific policies in the NPPF which indicate that the development should be restricted. Whilst it has been identified that the proposal will have an adverse impact on the quality of the landscape character of the area, and that it will result in the irreplaceable loss of countryside and has an impact on the setting of three listed buildings in the locality, it is considered that the benefits that the scheme brings such as the provision of new housing of which 35% of them will be affordable, contributions towards local infrastructure such as the highways improvements, provision of open space and the new school that the appellant has agreed to contribute towards outweighs the negative issues.
112. Significant weight must also be given to the fact that there are no unresolved objections from the Council's consultees to the scheme. There are no objections in terms of design; crime prevention; amenity; pollution; contamination; ecology; landscape; flood risk and drainage. The proposal will also help to deliver construction jobs and will also provide more residents who will help to sustain and potentially grow the local economy.
113. In relation to highways impacts there are road safety impacts which can be addressed through mitigation at Fishwick Corner and other highways infrastructure improvements which weigh in favour of the scheme by providing enhanced sustainable links.
114. As noted above there remains a road safety and capacity issue at the A143 Thurston Road junction (adjacent to The Bunbury Arms). A number of solutions have been investigated and the current preferred solution is traffic signals. The highway authority consider that the effects of the development can be mitigated but further detailed work needs to be undertaken to obtain the most practicable and viable solution to address the risks. For this reason the attention of the Committee is drawn to the Section 106 package of obligations (third bullet) which would have been expected and which includes an expected contribution towards highway mitigation but which in the circumstances is itself subject to a caveat that further detailed survey and design investigation is required.
115. Therefore, it is considered having regards to paragraph 14 of the NPPF that the benefit the proposal brings outweighs the negatives. Furthermore, when assessing the proposal against the NPPF it is not contrary to its requirements as a whole and there are no specific policies within it that would restrict this development and as such it is considered that it constitutes sustainable development which should be approved planning permission without delay in line with the requirements of paragraph 14.

Statement Required By Article 35 Of The Town And Country Planning (Development Management Procedure) Order 2015.

116. When determining planning applications The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires Local Planning Authorities to explain how, in dealing with the application they have worked with the applicant to resolve any problems or issues arising.
117. In this case the planning authority has worked with the applicant to overcome highway objections to the scheme and to clarify issues relating to drainage and impact on listed buildings.

Identification of any Legal Implications of the decision

118. There are no known legal implications derived from the determination of this application.
119. The application has been considered in respect of the current development plan policies and relevant planning legalisation. Other legislation including the following has been considered in respect of the proposed development.
- Human Rights Act 1998
 - The Equalities Act 2012
 - Town & Country Planning (Listed Buildings & Conservation Areas) Act 1990
 - Natural Environment and Rural Communities (NERC) Act 2006 (any rural site)
 - The Conservation of Habitats and Species Regulations 2010
 - Localism Act
 - Consideration has been given to the provisions of Section 17 of the Crime and Disorder Act, 1998, in the assessment of this application but the proposal does not raise any significant issues.

RECOMMENDATION

That Mid Suffolk District Council is minded to advise the Planning Inspectorate in relation to the non-determination appeal that it would have recommended the grant planning permission subject to the completion of a Section 106 or Undertaking to secure the following heads of terms:

- £706,447 is required towards the building of a new primary school in Thurston.
- £55,642 towards the cost of the land to provide the new primary school.
- £66,664 is required for the provision of new pre-school facility in Thurston
- 35% Affordable Housing to be transferred over to a Registered Provider
- To secure the provision of public open space to be managed by a dedicated management company
- £94,724 to secure off site highway improvement works as listed below:
 - Highway Improvement Contribution: £2333 contribution towards a Traffic Regulation Order (TRO) and associated works to extend the existing 30mph of speed limit on Norton Road eastwards to improve road safety for road users associated with the development. Payable prior to occupation of the first dwelling.

- Highway Pedestrian Crossing Improvement Contribution: £10,000 Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction to provide improved pedestrian access to the Academy and mitigate increase pedestrian and vehicle use. Payable on occupation of the first dwelling.
 - **Subject to the appropriate further investigation and resolution of a satisfactory scheme to address highway safety issues at the A143 Thurston Road junction** a Highway Capacity Improvement Contribution: £10,000 Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton to mitigate congestion at peak periods. Payable on commencement of work on site.
 - Highway Safety Improvement Contribution: £50,000 Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a contribution towards 40mph speed limit on the C692 Thurston Road to improve road safety and mitigate increased use. Payable on commencement of the first dwelling.
- To secure a travel plan in connection with the scheme detailed as follows:
 - 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 longer.
 - Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 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.

and that such permission be subject to the conditions as set out below:

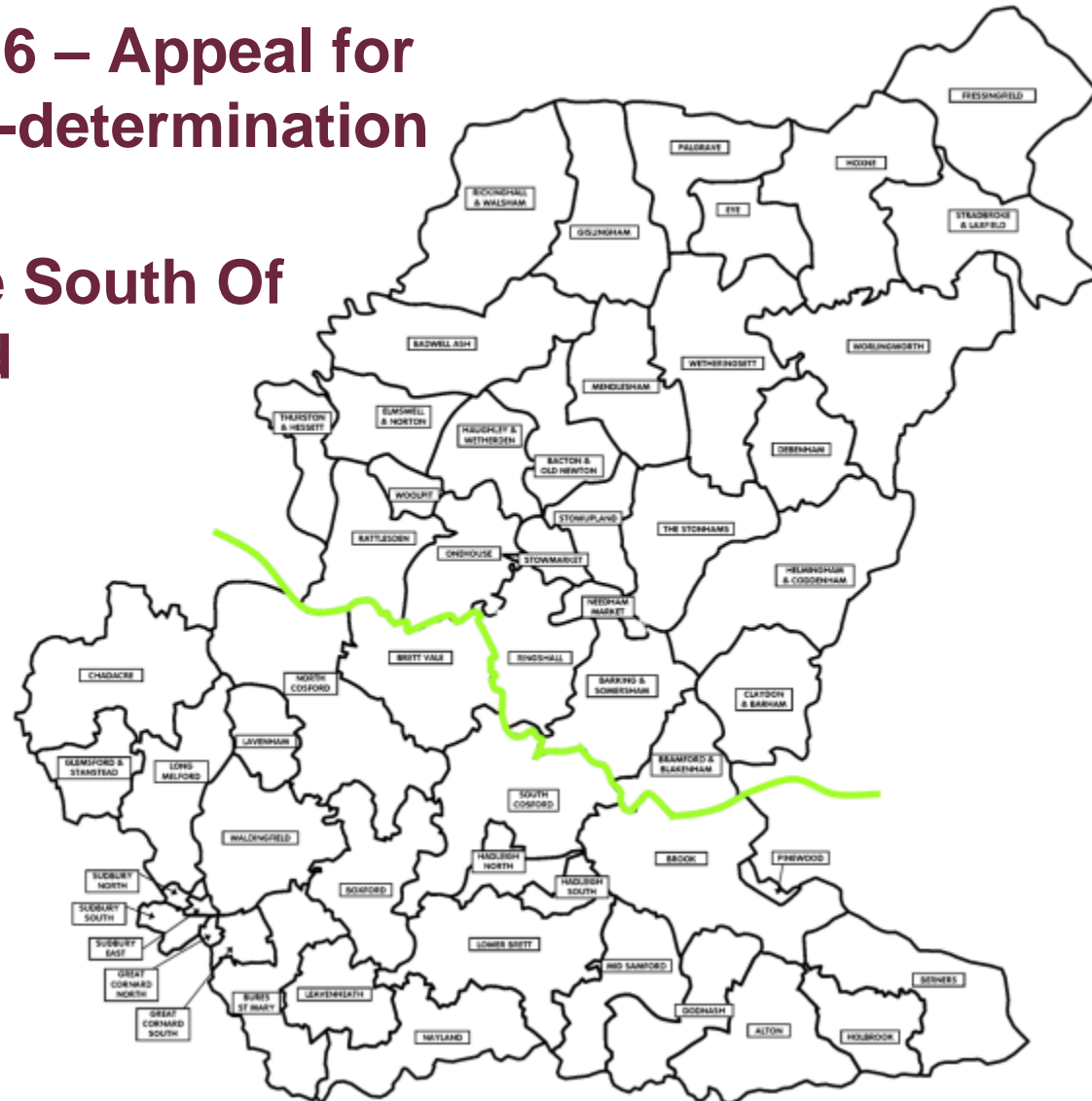
- 1) Two year time limit for submission of reserved matters (agreed with applicant)
- 2) Reserved matters (outline)
- 3) Existing tree protection
- 4) Contaminated land
- 5) Construction management agreement
- 6) External lighting
- 7) Commencement period for landscaping
- 8) Protection of birds during construction period
- 9) Works to be carried out in line with the ecological report.
- 10) Archaeology
- 11) Highway Conditions (covering site access, Internal layout, Construction management plan, highway drainage, footway and cycle connectivity)
- 12) Surface water drainage

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Application No: 5010/16 – Appeal for non-determination

**Address: Land To The South Of Norton Road
Thurston
IP31 3QH**

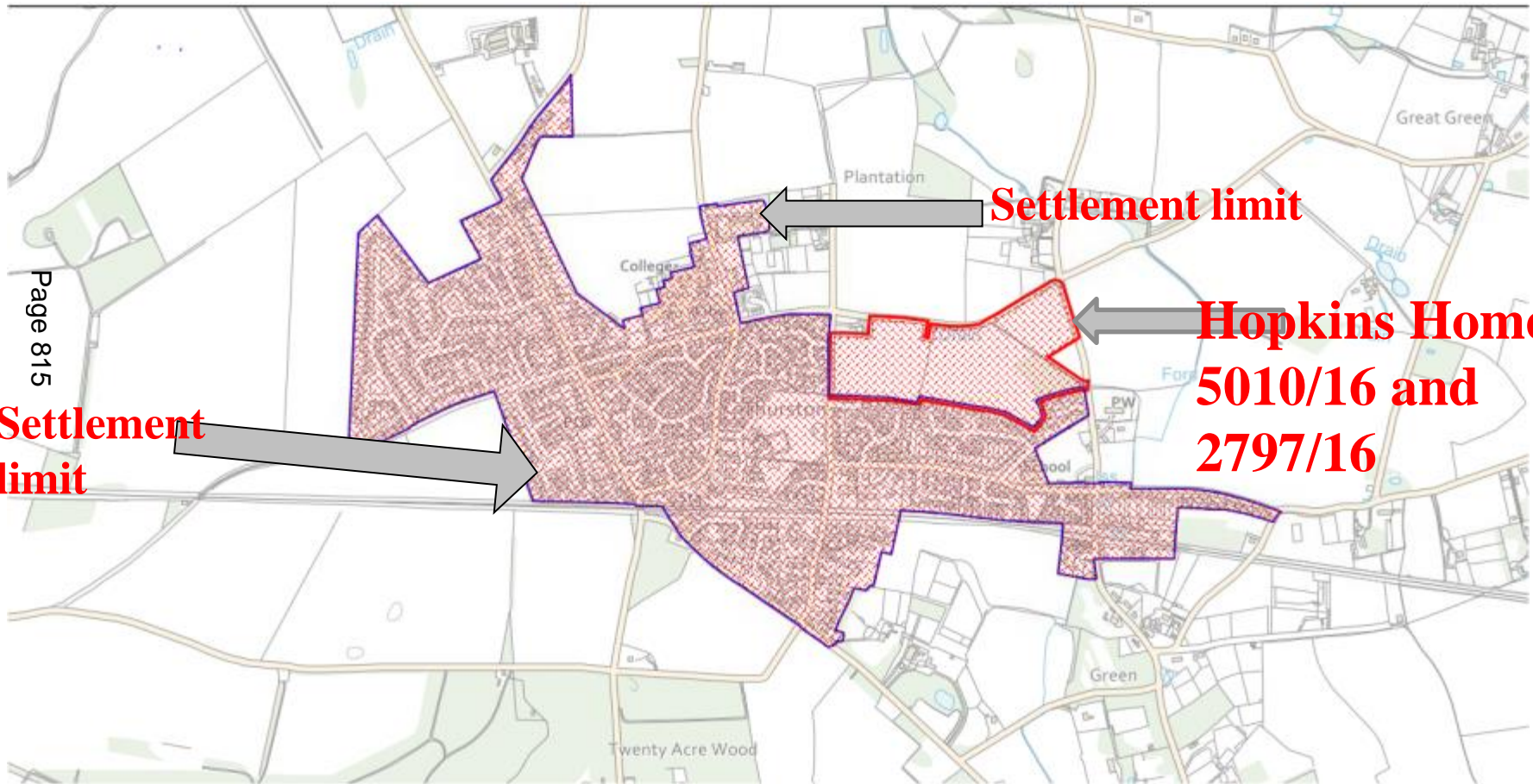
Page 813





Verbal Updates:

- Confirmation and summary of any 3rd Party representations received not previously issued to members.
- Confirmation and summary of any consultee responses received not previously issued to members
- Confirmation of any changes to recommendation, conditions or reasons.



Settlement limit

**Hopkins Homes
5010/16 and
2797/16**

**Settlement
limit**




Committee Site Plan

5010/16 Land to the South of Norton Road Thurston IP31 3QH

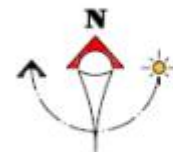
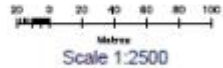


MID SUFFOLK DISTRICT COUNCIL
 131, High Street, Needham Market, IP6 8DL
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Key

- Site Boundary
- New Landscaped Tact
- Ecological And Surface Water Abatement Area Within Informal Pasture Setting
- Vehicle Access Into Site From Driveway Lane
- Proposed Footpath and Gym/Ten Trail
- Indicative Main Street
- Indicative Secondary Street
- Potential Footpath Link
- Existing Public Footpath
- Proposed Public Open Space
- Allotments
- Informal Historical Area
- Proposed Churchyard Extension
- Proposed On Footpath/Cycle way widened to 3.0m as necessary for emergency access
- Replacement Hedge Planting Near Of Visibility Sides
- Existing Residential Development
- Potential Location Of Four Water Pump Station
- Existing Hedges To Be Retained Where Possible
- Storey Heights**
 - 1 - 1.5 Storey Development: 6.0-7.0m ridge height
 - 2 Storey Development: 7.5-8.5m ridge height
 - Possible Locations for 3.5-3 Storey Development: 8.5-12.0m ridge height



Thurston, Suffolk

Development Framework Plan

Drawing Reference: Thur/01 Rev C

MELTON PARK HOUSE,
MELTON WOODBRIDGE,
SUFFOLK IP2 2D
TEL: 01284 444000 FAX: 01284 284400

Page 817

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From: Rutter, Matilda [mailto:Matilda.Rutter@HistoricEngland.org.uk]
Sent: 13 January 2017 12:40
To: Planning Admin
Subject: Application for Planning Permission: LAND TO THE SOUTH OF NORTON ROAD, THURSTON, SUFFOLK, IP31 3QH (5010/16)

Dear Mr Jones

**LAND TO THE SOUTH OF NORTON ROAD, THURSTON, SUFFOLK, IP31 3QH
(5010/16)
Application for Planning Permission**

Thank you for consulting Historic England on the above application dated 12th January 2017. The lead specialist for this case (David Eve) has assessed the application and asks that you please refer to our previous comments on the duplicate application (2797/16) dated 11/08/16 (initial application) and 02/11/16 (amendments to application). I have attached these to this email.

Our comments remain the same.

Kind regards

Matilda Rutter | Business Officer (Suffolk)
Telephone: 01223582749
Direct Line: 01223 582740
Historic England | Brooklands
24 Brooklands Avenue | Cambridge | CB2 8BU
www.historicengland.org.uk

For the first time ever, you can no



Historic England

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Ms Lisa Evans
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582721

Our ref: P00519508

2 November 2016

Dear Ms Evans

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015

**LAND TO THE SOUTH OF NORTON ROAD, THURSTON IP31 3QH
Application No 2797/16**

We have received amended proposals for the above scheme.

Summary

This application proposes a large residential development on farmland at the northern edge of Thurston village. This land sits between the village and the grade II* listed Manor Farm House with the parish church of St Peter to the south east. An assessment of the significance of the house and the impact on it has now been submitted as required by the NPPF.

Historic England Advice

In our earlier advice we noted the importance of Manor Farm House, a grade II* listed building. The Heritage Statement submitted in support of the application has provided further helpful detail of the architectural significance of Manor Farm House. It has also established the link between the building and farming (paragraph 3.27) and that while the immediate grounds are quite enclosed (3.31) it stands in a predominantly agrarian landscape (3.28). The Statement correctly concludes that this landscape contributes to the significance of the listed building.

The Statement acknowledges that there is a 'minor degree of inter-visibility' between the house and this landscape, including the development site. In addition the site can be seen from the drive immediately in front of the house. The applicant's consultant has not accessed the house to see if views might be had from principle rooms and the balustraded deck on top of the roof may well have been designed to be accessed and the scene surveyed, including the application site.

We conclude that as the proposed development would bring modern building

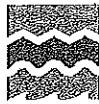


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significantly closer to the listed building and affecting the agricultural character of the landscape would diminish the way in which it contributes to the setting of Manor Farm House. Since the application was first submitted we have also had the opportunity to visit the site. As well as the intervisibility between Manor Farm House and the site we noted that the tower of the parish church of St Peter is more prominent in views from the north west across the application site than anticipated although planting around the existing dwellings between the two does reduce the visual impact.

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). The National Planning Policy Framework (NPPF) builds upon the 1990 Act. It identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings can be harmed by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favorably.

Having reviewed the proposals in light of the recently submitted assessment and visited the site we are of the view that the proposed development could result in a degree of harm to the significance of Manor Farm House and also the parish church of St Peter in terms of the NPPF paragraphs 132 and 134. Paragraph 134 asks planning authorities to weigh any public benefit delivered by developments against such harm. The proposed housing might deliver such a benefit and the Council should consider this when seeking the 'clear and convincing' justification for the harm required by the NPPF. We would note that the area to be left undeveloped in the north eastern corner of the application site could be beneficial to the setting of Manor Farm House and suggest that a similar landscaping belt along the whole northern edge of the site might also mitigate, but not wholly remove the harmful impact.

Recommendation

We consider that the proposed development in the vicinity of the grade II* listed Manor Farm House and the parish church of St Peter could result in harm to the significance of the historic buildings in terms of paragraph 132 of the NPPF. As required by paragraph 134 the Council should weigh any public benefit delivered by the development against such harm when seeking the 'clear and convincing' justification required by the NPPF. We would note that the area to be left undeveloped in the north eastern corner of the site could be beneficial to the setting of Manor Farm House is



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suitably planted and suggest that a similar landscaping belt along the whole northern edge of the site might also mitigate, but not wholly remove the harmful impact.

Yours sincerely



David Eve

Inspector of Historic Buildings and Areas

E-mail: david.eve@HistoricEngland.org.uk



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Ms Lisa Evans
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582721

Our ref: P00519508

11 August 2016

Dear Ms Evans

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015
LAND TO THE SOUTH OF NORTON ROAD, THURSTON IP31 3QH
Application No 2797/16**

Thank you for your letter of 22 July 2016 notifying Historic England of the above application.

Summary

This application proposes a large residential development on farmland at the northern edge of Thurston village. This land sits between the village and the grade II* listed Manor Farm House. By bringing the edge of development closer to the listed building the development has the potential to erode the rural character of this setting and so harm its significance in terms of the NPPF. The application has not assessed the significance of the house or the impact on it as required by the NPPF.

Historic England Advice

Manor Farm House was constructed in 1876 to designs by renowned architect Phillip Webb. Webb was a major figure in late Victorian architecture producing notable work in the Arts and Crafts style and, as here, in the Queen Anne Revival style. This architectural movements developed in the 1870s and looked back to English architectural traditions (in particular domestic forms from the early years of the 18th century) to create an modest, elegant, dignified and somewhat playful new language in contrast to the earnest and powerful forms of Gothic and classical which had dominated the 19th century to that point.

Chiefly a domestic form (though also used in institutional buildings such as Newnham College Cambridge and King Edward VII Grammar School, King's Lynn) the Queen Anne was often found in urban developments but its use of traditional forms and concern with quality detailing akin to the Arts and Crafts also made it suited to rural settings. In this case the house is associated with functional farm buildings (timber framed barns around a covered yard) and was placed in a working agricultural landscape, not in a suburban villa context.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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



Historic England

EAST OF ENGLAND OFFICE

Since the construction of Manor Farm House Thurston village has grown on its northern side toward the listed building, but there is still considerable undeveloped farmland around it. This is important in maintaining the original character of its setting and relationship with an agricultural landscape. The proposed development would bring further modern building (up to 175 houses and associated facilities) significantly closer to the listed building. The landscape around Thurston is relatively flat and open and the steeply pitched roof and tall chimneys of the house are quite prominent in the landscape. Indeed, the house has a large dormer window on its southern roof from which views towards the application site can probably be had. The development has the potential to bring modern development into the setting of Manor Farm House, which by eroding the rural character of its surroundings could harm its historic significance.

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). The National Planning Policy Framework (NPPF) builds upon the 1990 Act. It identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings can be harmed by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favorably.

In order to allow identification of possible harm to the significance of heritage assets by proposed development paragraph 128 of the NPPF requires applicants to describe the significance of heritage assets affected and the contribution their setting might make to that significance. Sufficient information should also be provided to enable an understanding of the potential impact of the development on the assets. The Landscape and Visual Impact Assessment submitted with the current application mentions the grade II* listed house, but does not establish its significance or the effect the development might have on it. Viewpoint 6 is taken from the general area south of Manor Farm House and gives a general indication of how close the development might be to this view point. Although it is not ideal for considering the listed building we note that the Assessment concludes the impact on this view point would be 'low' but does not contain any images to demonstrate this.



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Historic England

EAST OF ENGLAND OFFICE

The Archaeological Desk Based Assessment also mentions Manor Farm House, but says nothing of its significance or the contribution made by its setting. Despite being a desk based exercise it concludes the application site is 'not part of the setting' of Manor Farm House. This is not a helpful statement as it is the impact of the development on any area in which the heritage asset can be 'experienced' (the definition of setting in the NPPF) that should be established.

We conclude that the application does not contain sufficient information to satisfy the requirements of paragraph 129 of the NPPF, a requirement that should be taken seriously given that Manor House Farm falls within the top 5 of listed buildings nationally. Without any such assessment we maintain our concern that the development could result in harm to the listed building's significance in terms of the NPPF paragraph 132 and would not support the granting of consent as the application stands.

Recommendation

We are concerned the proposed development in the vicinity of the grade II* listed Manor Farm House could result in harm to the significance of the historic building in terms of paragraph 132 of the NPPF. The information required by paragraph 128 to allow assessment of this impact has not been produced. We would not support the granting of consent at this stage and recommend this application is refused, but would be keen to see any further details which are submitted and offer further advice to the Council.

Yours sincerely



David Eve

Inspector of Historic Buildings and Areas
E-mail: david.eve@HistoricEngland.org.uk



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Consultee Comments for application 5010/16

Application Summary

Application Number: 5010/16

Address: Land to the south of Norton Road, Thurston IP31 3QH

Proposal: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16)

Case Officer: Dylan Jones

Consultee Details

Name: Mr Robert Boardman (Stowmarket Ramblers)

Address: 8 Gardeners Walk, Elmswell, Bury St Edmunds IP30 9ET

Email: bob@gardeners8.plus.com

On Behalf Of: Ramblers Association - Bob Boardman (temp cover)

Comments

I have viewed these plans and the only public footpath, no.6, which crosses this site to the north east corner will be through the "green area" and will become another "manufactured" path and loose it's natural appeal.

From: Phillippa Stroud
Sent: 20 January 2017 16:43
To: Planning Admin
Cc: Dylan Jones
Subject: 5010/16/OUT Land to the south of Norton Road, Thurston

WK/188833

Ref: 5010/16/OUT EH – Other Issues
Location: Land to the south of Norton Road, Thurston IP31 3QH
Proposal: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16)

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

Please refer to our previous comments, from Joanna Hart, on duplicate application 2797/16/OUT dated 12.08.16 and 17.11.16.

We have no further comments.

Regards,

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

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 13 January 2017 15:55
To: Planning Admin
Subject: 5010/16 Consultation response

Dear Sir/Madam,

Application ref: 5010/16
Our ref: 205911

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

Jacqui Salt
Natural England
Consultation Service
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

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

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

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

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)



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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk


Council's Reference: 5010/16

Referring to the planning application referenced above, dated 16 January 2016, application for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments and vehicular access from Sandpi Lane, Land to the south of Norton Road, Thurston IP31 3QH, 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.¹

¹ Where relevant, further information will be provided within Annex A.

| | |
|---|-------------------------|
| Signature  | Date: 23 January 2017 |
| Name: David Abbott | Position: Asset Manager |
| Highways England: Woodlands, Manton Lane Bedford MK41 7LW | |
| david.abbott@highwaysengland.co.uk | |

From: Andrea Stordy
Sent: 23 January 2017 12:13
To: Planning Admin
Subject: FAO: Dylan Jones

Planning Application: 5010/16
Location: Land to the South of Norton Rd, Thurston, IP31 3QH

Good Afternoon,

Thank you for your letter of 12/01/2017.

Please be advised that we have made formal comment on Land to the South of Norton Rd, Thurston, IP31 3QH, under planning application 2797/16, which we note has been published. The comment may remain in place for planning application 5010/16.

If you have any queries, please email them to water.hydrants@suffolk.gov.uk, quoting Fire Ref.: F310954.

Kind regards,

Sent on behalf of the Water Officer

Andrea Stordy
BSC

Engineering,

From: RM Floods Planning
Sent: 23 January 2017 14:35
To: Planning Admin
Cc: Dylan Jones
Subject: 2017-01-23 Land to the south of Norton Road, Thurston IP31 3QH Ref 5010/16

Suffolk County Council, Flood and Water Management refer you to our comments made to the application 2797/16.

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864



England

Midlands & East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF

Email address: kerryharding@nhs.net

Telephone Number -- 0113 824 9111

Your Ref: 16/5010

Our Ref: NHSE/MIDS/16/5010/KH

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

27 January 2017

Dear Sirs,

**Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16)
Land to the south of Norton Road, Thurston, IP31 3QH**

1. I refer to your consultation letter on the above planning application and advise that, following a review of the applicants' 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 up to 175 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 are 2 GP practices within a 2km radius (or closest to/ within catchment) of the proposed development. These practices do 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 services 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 (or closest to/ within catchment) of the proposed development.

| Premises | Weighted List Size ¹ | NIA (m ²) ² | Capacity ³ | Spare Capacity (NIA m ²) ⁴ |
|-----------------------|---------------------------------|------------------------------------|-----------------------|---|
| Mount Farm Surgery | 12,244 | 768.40 | 11,206 | -71.19 |
| Woolpit Health Centre | 14,134 | 645.87 | 9,419 | -323.32 |
| Total | 26,378 | 1,414.27 | 20,625 | -394.51 |

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 120m² 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 at Woolpit Health Centre, servicing the residents of this development, by way of their phase 2 premises extension, 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 extend 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.

High quality care for all, now and for future generations

Yours faithfully



Kerry Harding
Estates Advisor

High quality care for all, now and for future generations

From: Nathan Pittam
Sent: 03 February 2017 08:51
To: Planning Admin
Subject: 5010/16/OUT. EH - Land Contamination.

M3 : 188839
5010/16/OUT. EH - Land Contamination.
Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping ...

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that the applicant has not submitted the required BS10175 compliant Phase I desk study to demonstrate the suitability of the site for the proposed end use. Without this information I would be minded to recommend that the application be refused on the grounds of insufficient information.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715
m: 07769 566988

From: Nathan Pittam
Sent: 03 February 2017 08:51
To: Planning Admin
Subject: 5010/16/OUT. EH - Land Contamination.

M3 : 188839

5010/16/OUT. EH - Land Contamination.

**Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Application for Outline Planning Permission (with all matters other than means
of access reserved) for residential development of up to 175 dwellings with
associated car parking, landscaping ...**

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that the applicant has not submitted the required BS10175 compliant Phase I desk study to demonstrate the suitability of the site for the proposed end use. Without this information I would be minded to recommend that the application be refused on the grounds of insufficient information.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715
m: 07769 566988

NEIGHBOURHOOD PLAN TEAM

Parish Council Office
New Green Centre
New Green Avenue
Thurston
Suffolk
IP31 3TG
Tel: 01359 232854
e-mail: thurstonnpsg@hotmail.com



Councillor P Robinson
Chair of Thurston Planning Committee
Thurston Parish Council
New Green Centre
Thurston
IP31 3TG

Mr P Isbell
Corporate Manager, Development Manager
Mid Suffolk District Council
131 High Street
Needham Market
IP6 8DL

31st January 2017

Dear Cllr. Robinson,

Re: 5010-16 – Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments and vehicular access from Sandpit Lane (duplicate to application 2797/16) @ land to the south of Norton Road

Thank you for allowing the Neighbourhood Plan Team to comment on several planning applications that have been submitted to the Parish Council by a number of agents acting on behalf of Developers. The Neighbourhood Plan Team is aware that, with the submission of 6 applications (one is a duplicate) for a total of over 800 dwellings, Thurston is facing an immediate, exceptional planning issue. The Neighbourhood Plan Team is concerned that if the major applications now submitted are to be dealt with on an individual basis there will be a failure by the District Council to understand the cumulative impact such growth will have on the community of Thurston. It is also held that consideration of each individual planning application will not provide an appropriate response to the National Planning Policy Framework requirements nor to the impact on Thurston itself. It is for this very reason that the Neighbourhood Plan Team have concentrated their efforts at looking at the common issues facing each application as well as looking at the fundamental principle of development for each individual site and where provided, specifically the more detailed layout proposals and their impact given each location.

The Neighbourhood Plan Team would also like to state that in accordance with the Parish Council Protocol's for Pre Planning Application Developments – no comments on the suitability of the site for development or how the site performs in relation to others ahead of the site assessment work were made during the attendance of representatives from any of the Developers/Land Owners or their agents at Neighbourhood Plan Meetings and that whilst all applicants who attended such meetings had been informed that they could state that they had met with the Neighbourhood Plan Steering Group they could not in any forthcoming developer public meetings state that their proposals have in any way, shape or form, been endorsed by the Neighbourhood Planning Steering Group.

Whilst Thurston Parish Council is at a relatively advanced stage in preparing a Neighbourhood Plan and whilst the plan has not yet reached the final stage of allocating sites or proposing policies, following consultation with the public and land owners and agents on the site assessments carried out during Summer – Autumn 2016 it should be afforded some weight in responding to this application. The results of the site assessments as carried out under the Parish Housing Land Availability Assessment, has raised some issues which the Neighbourhood Plan Team feel are so major and fundamental that they must be taken into account by Mid Suffolk District Council in determining these applications.

A copy of all site assessment work can be seen within Thurston's Village website:
<http://thurston.suffolk.cloud/neighbourhood-plan/site-assessment-of-sites-for-development/>

The Neighbourhood Plan Team would like to state that it is disappointed at the speed at which this and other applications have been submitted for new housing in the village. There seems to be a general haste to ensure that each development is the first to submit with little regard for the cumulative impact that each development will have on the general infrastructure of Thurston which requires time to evolve and time to absorb new residents and associated growth. There is a general concern that the size of new developments being proposed will result in Thurston losing its 'village feel' and for it to become 'a small town'.

The Neighbourhood Plan Team is also disappointed that despite reassurances from Mid Suffolk that work on its Local Plan is proceeding, there is still no information being released as to the expected housing growth in the area and that work on the Councils Housing needs (Objectively Assessed Needs) is ongoing.

Given the scale of proposed housing development, the Neighbourhood Plan Team would request that the District Council adopts a cohesive approach that looks at the totality of applications and their impact on all of Thurston's infrastructure and social development. As way of emphasis the following table demonstrates the applications that are facing Thurston:

| Owner/Builder | Planning Reference | Status of application | Description of development | Number of dwellings |
|---|--------------------|--|--|---------------------|
| Playdri Products Ltd, Granary Site, Station Road | 2430/08 | Outline granted. Phase 2 delayed. | Remainder of site with blocks of flats. | 92 |
| Playdri Products Ltd, Granary Site, Station Road | 3181/13 | Preliminary work started on phase 1 in 2016. | Single building commercial centre with 9 flats above | 9 |
| Bovis Homes, Barton Road | 4386/16 | No decision Comments closed | Purely residential | 138 |
| Hopkins Homes, Sandpit Lane | 2797/16 & 5010/16 | No decision No decision | Purely residential | 175 |
| Pigeon Developments, Norton Road | 5070/16 | No decision | Residential with 2 form entry primary school | 200 |
| Persimmon, Ixworth Road | 4963/16 | No decision | Residential with primary school (no size given) | 250 |
| Laurence Homes, Norton Road | 4942/16 | No decision | Purely residential | 64 |
| Possible number of dwellings to be added to Thurston | | | | 928 |

Regarding the common issues for all six applications submitted (4942/16; 4963/16; 5010/16; 5070/16; 4386/16 & 2797/16), the Neighbourhood Plan Team has broken these down into 4 main areas: Education; Housing and Transport and Social Challenges

- **Education:**

Currently primary education facilities are landlocked and full. Any future housing requires functioning primary education facilities before housing occupancy. The footpath and road network also needs substantial improvement to accommodate additional education provision. It is felt that multiple housing planning applications in Thurston demand a cohesive approach that looks at the totality of applications as well as individual consideration considering the impact of all of them, on education and other infrastructure issues. In addition, Secondary students 11-16 currently attend Thurston Community College. Post 16 students are located in Beyton. It is understood that at some point in the future students may relocate to the Thurston site. Further secondary provision is available in both Ixworth and Bury St Edmunds. Suffolk County Council Education Department has indicated that were sufficient housing to be built in Thurston, Woolpit and Elmswell further secondary provision would be required somewhere along the A14 corridor.

Any significant housing would require additional primary education places. Suffolk County Council (letter from Peter Freer to Lisa Evans, MSDC) referring to Planning Application 2797/16 outlines its position:

'NPPF paragraph 72 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.'

'We currently forecast to have no surplus places at the catchment Primary School to accommodate children arising [from new developments], but there is some capacity at the Community College. The Primary School site is landlocked and cannot be expanded and the Community College has the largest secondary catchment in the County and is unlikely that expansion would be supported in the future.

'The County Council has been in discussions with the District 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.

'The anticipated approach to mitigate the impacts of housing growth in the area is to provide a new primary school which would incorporate the existing primary school. This new primary school would be constructed as a 315-place school initially, capable of being expanded to 420 places to meet future development. The estimated construction cost of a 420 place primary school is £6.9 million on a 2.2 hectare site.'

In addition, given capacity and legislative issues

'... the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 26 place setting, providing sufficient capacity for 52 children in total.'

The Thurston Neighbourhood Plan Team recognises and endorses the County Council position. New housing development on any scale in Thurston requires provision of a functioning primary school with early education places before the occupation of housing. There is no spare capacity in existing provision.

Any chosen location for a Primary School will have an impact on roads and footpaths in the village. There are major transport issues associated with the Community College. Over 25 coaches bring and take students to and from the College daily. The road network is under pressure: the coaches and parents' cars delivering and collecting students near the College create a daily problem. When there are parents' evenings, cars are parked inappropriately on footpaths, verges and close to road junctions.

In the current location, the Primary School presents associated pedestrian and vehicle concerns. In a new location, a larger school will bring added demands. Appropriate footways, road crossings, vehicle access (immediate and wider) and car parking will need to be accommodated. There is nowhere in Thurston that has current adequate provision to assimilate the pedestrian and vehicle movements particularly at the beginning and the end of the day in school term time.

- **Housing**

Thurston has received 5 planning applications over recent weeks from 5 separate developers. The total number of dwellings proposed by these applications amounts to 827 homes – which would result in approximately a 64% increase in the current total housing stock of Thurston. These figures do not include the 2 existing applications at the Granary which add a further 101 dwellings to the tally. Should all applications be approved, there is a concern that not only will the village infrastructure be insufficient to cope, but the whole nature and ambiance of Thurston will change from that of a large vibrant village to that of a faceless dormitory town. The determination of these applications should be viewed as a whole if the development within Thurston is to be sympathetic and sustainable. Considering each application individually has the potential to allow by default considerably more development than the village could cope with.

A break-down of housing types and numbers (where known) is provided below:

| Site | Land west of Ixworth Road 4963/16 | Land at Norton Road 5070/16 | Land at Meadow Lane 4942/16 | Land south of Norton Rd 2797/16 5010/16 | Land west of Barton Rd 4386/16 | Land west of Ixworth Road 4963/16 | Land at Norton Road 5070/16 | Land at Meadow Lane 4942/16 | Land south of Norton Rd 2797/16 5010/16 | Land west of Barton Rd 4386/16 | Land west of Ixworth Road 4963/16 | Land at Meadow Lane 4942/16 |
|---------------------------|-----------------------------------|-----------------------------|-----------------------------|---|--------------------------------|-----------------------------------|---------------------------------------|-----------------------------|---|--------------------------------|-----------------------------------|-----------------------------|
| Bedrooms | Market Housing | | | | | Affordable Housing | | | | | Intermediate/shared equity | |
| 1 | | 5 | | | | | | | | | | 24 appts |
| 2 | | 4 terraced 12 bungalows | 6 | | 4 bungalows | | 0 bungalows 5 appts | | | | | 18 houses |
| 3 | | 25 semis 26 detached | 13 | | 3 bungalows 22 houses | | 3 bungalows 5 appts 12 terraced | | | | | 6 houses |
| 4 | | 31 detached | 17 | | 48 houses | | 31 semis 6 detached | | | | | 2 houses |
| 5 | | 18 detached | 6 | | 13 houses 2 4/5 houses | | | | | | | |
| Selfbuild | | 9 | | | | | | | | | | |
| Sub Total | 163 | 130 | 42 | 114 | 90 | 85 | 70 | 18 | 61 | 40 | 22 | 6 |
| Total | 539 | | | | | 280 | | | | | 28 | |
| Final total 827 dwellings | | | | | | | | | | | | |

NB: Types and numbers of dwellings are shown where they have been made available in the Planning Application.

Generally, all the proposed sites are situated on land currently used for agricultural purposes on the outer boundaries of the village. The Neighbourhood Plan Team having considered the agricultural classification of land upon which these sites are situated had been made aware that, based on the generalised 1:250000 maps, the best and most versatile land generally occurs to the north of the village. Whilst it is recognised that individual site classifications are usually fully determined following detailed field work, the Neighbourhood Plan Team is concerned that development is being proposed on the best and most versatile land. Furthermore, all of the sites that have been submitted under planning applications that have come forward, are situated outside the Settlement Boundary and face out onto open countryside. The visual impact of each proposed development on approaching the village will be significant and will have an impact on the existing character and appearance of the countryside.

In general, the sites are of a higher density than those in their immediate vicinity. The plans reflect housing more appropriate to an urban landscape rather than a rural village. Several of the proposals include 2.5 to 3-storey dwellings with ridge heights of up to 12m. No other housing of this type can be found nearby. All the sites have at least one boundary abutting existing bungalows, dormer bungalows or small cottages. The designs are therefore not in keeping with the scale, type or density of housing in their locality.

Feedback from the Neighbourhood Plan Survey indicates that residents accept the need for expansion but in a sympathetic and controlled manner in order that infrastructure can keep pace with demand. Furthermore, they expressed, inter alia, a desire for relatively small developments of up to 50 dwellings with open spaces which reflect those found in other parts of the village. The survey indicates that during the next 15 years, 47% of respondents would be looking for bungalow accommodation, 44% homes suitable for retirees and 17% for assisted living and care homes. The proposed plans do not reflect the residents' future needs and are not, therefore, considered to be sustainable. Neither do the applications reflect the continuing need for housing across all tenures and a growing need for affordable housing. The Ipswich Housing Market Area, Strategic Housing Market Assessment (SHMA) Document and 2014 Suffolk Housing Needs Survey all show that there is a high demand for smaller homes across all tenures from those who maybe starting households to those who may be looking to downsize.

The Enabling Housing Officer at Mid Suffolk in her response to Planning Application 4386/16 makes reference to the fact that affordability issues are the key driver for the increase in smaller homes and that there is a strong demand for one and two bedroom flats/apartments and houses.

The large number of dwellings proposed would result in a substantial increase in the number of motorized vehicles within the residential areas. The Neighbourhood Plan Team does not consider the plans take sufficient heed of on-site parking requirements. This failure will inevitably lead to overspill onto and congestion within adjacent roads.

- Transport

Thurston is situated inside a triangle of A roads, the base of which is the A14, the eastern side is the A1088 and the western side is the A143. The apex of the triangle is just north of Pakenham where the A1088 crosses the A143. There are no B roads inside this triangle. All the interior roads are just for local access and by-roads, which are not maintained by the council to a standard suitable for heavy traffic. Current potholes in some places are described as "a death trap for cyclists". Access to the A14 towards Bury St Edmunds is often via Fishwick Corner where Barton (New) Road makes a junction with Mount Road. This has already been found to be an accident-prone congested junction with current traffic flows. At the other end of Barton Road there is access to the A143 and this junction is also often congested and subject to accidents. All of the applications submitted fail to take into account the committed schemes within Bury St Edmunds, Ixworth and Stanton which will alter the traffic flows along these road networks.

The standard S2 single carriage way in each direction type of road, upon which the Transport Assessments base their computer models, is described as 7 m in width. The roads leading into and out of Thurston do not have consistent widths and can be as narrow as 4.3 m. Norton Road, Church Road and School Road have places, unencumbered by parked vehicles, where two cars cannot pass safely and vehicles have to draw right off the road if a bus or larger vehicle comes along. Furthermore the Grade II listed Railway Bridge on Barton Road warns high vehicles to drive in the middle of the narrow road to get through under the arch. While one footway varies in width from 1 m to only 0.7 m, the opposite one tapers to nothing at all. Currently there is only room for one way vehicle flow over the other railway bridge on Thedwastre Road and no safe footway for pedestrians, just a white line one metre from the wall. Thedwastre Road leads to the junction with Beyton Road where congestion in the morning is already well recorded.

The traffic in and around Thurston varies enormously depending on the time of day as the Community College, Beyton Sixth Form College and Ixworth Free School educate students from a wide area, with many students being carried in coaches twice a school day. Travelling through and to the Community College and the Village are Bus Routes TN112; TN114; TN118; TN120; TH140; TN144; TN161 and TN163. In the morning and afternoon 25+ coaches and numerous vehicles deliver and pickup students and have a negative impact on the flow of traffic along Norton Road, Barton Road and Station Hill. In the afternoon this congestion is more noticeable as the coaches arrive in 2 dedicated waves with early arrival by the second wave creating issues. Some routes have a note to coach drivers to approach the College via Station Road to avoid other blocks near the Post Office/village stores on Barton Road where there are usually cars parked, narrowing the road. Other buses, provide a service to Stowmarket to Bury St Edmunds via Beyton and a service from Stowmarket to Bury St Edmunds via Norton. Combined, these give an hourly service to people in Thurston in each direction throughout most of the day Monday to Saturday. The route in Thurston is via School Road, Church Road, Norton Road, Heath Road, Genesta Drive and Barton Road. This means that in addition to the school transport at peak times, buses are travelling through the village throughout the day. Furthermore on a Monday to Saturday there is a bus service to Diss which stops outside Thurston Community College at 0855 and arrives back in Thurston (opposite Community College) at 1605.

From Monday to Saturday, there are hourly train services in each direction throughout the day, generally at 29 minutes past the hour to Stowmarket and Ipswich (east), and 12 minutes to the hour to Bury St Edmunds and Cambridge (west), with variations in the evenings and early mornings. There are slightly fewer trains on Saturdays. On Sundays and Bank Holidays there is a two-hourly service, but there are alternative two-hourly services to Ipswich and Peterborough from Bury St Edmunds. The main drawback to train travel for future growth for those unable to walk to the station is that there are only 12 official parking places provided and these are filled very early in the day. Cyclists also have only 1 cycle rack to hold 4 cycles and a notice telling them that only the official rack may be used. Overflow parking up Station Hill already happens. The rest of the Granary site is the subject of development plans belonging to a private developer and there is no room for the provision of extra parking. Of significant concern to the Neighbourhood Plan Team is the necessity for passengers having to walk across two tracks which carry non-stop passenger and goods trains to access one of the platforms. Although there is a siren, the risk will be heightened the more footfall there is at the station. The Team is concerned that there are no plans to see improvements made to this station at a time when Network Rail is closing rural footpaths that cross

rail tracks due to the dangers posed and yet this dangerous crossing, which has to be used every day by many including schoolchildren, is deemed to be safe.

The Neighbourhood Plan Team is concerned that, having viewed the documents still available on Mid-Suffolk's District Planning site for the development at the Granary, no Transport Assessment can be found, although a commercial centre will involve delivery vehicles as well as visits from customers, besides the trips made by the cars and vans used by residents of the proposed 100 or so flats. The more recent planning applications from agents acting on behalf of Bovis Homes, Hopkins Homes, Persimmon Homes and Pigeon Capital Management 2 Ltd include lengthy Travel Assessments. All state that they have examined the traffic flow at various key junctions in Thurston at AM and PM peak times and supply all their data and name the computer programs they have used to calculate capacity and degrees of congestion. It is noted that the Laurence Homes application for 64 homes is apparently a borderline size which may not need an assessment.

It is also stated in the assessments that the key junctions were decided on in pre-application consultations with Suffolk County Council. These were often examined by more than one developer however the Neighbourhood Plan Team is concerned that none of them examined the flow over the narrow one-carriageway railway bridge on Thedwastre Road and that not all of the applicants included within their crash assessments included Fishwick Corner which has a higher proportion of incidences than other areas quoted.

| Developer | Road | Junction | AM 2016 | PM 2016 | Accidents 2010-2014 | AM Future | PM Future |
|--|-------------|---|------------------|------------------|-----------------------|-------------|-------------|
| Pigeon Developments | Norton Road | Peak traffic | 160→ | 110← | | | |
| Bovis Homes | Barton Road | | A | A | | +29% | +29% |
| Pigeon Developments Hopkins Homes | | Norton Rd/ Church Rd/ Pakenham Rd | A | A | | A | A |
| Pigeon Developments Hopkins Homes | | Norton Rd/ Sandpit Lane/ Meadow Lane | A A | A A | | A A | A A |
| Pigeon Developments Persimmon Homes Bovis Homes Hopkins Homes | | Barton Rd/ Station Hill/ Mini Roundabout | A B A B | A A A B | 1 Slight 1 Serious | A A B | A A C |
| Pigeon Developments Hopkins Homes | | Beyton Rd/ Thedwastre Rd | D B | C A | | D D | C A |
| Pigeon Developments Persimmon Homes Bovis Homes | | Barton Rd/ Norton Rd | A A B | A A A | | A A B | A A A |
| Persimmon Homes | | Ixworth Rd/ Norton Rd | C | A | | C | B |
| Bovis Homes | | Barton Rd/ A143 | D | F | 5 Slight 1 Serious | F | F |
| Bovis Homes | | Barton Rd/ Beyton Rd | C | A | | D | C |
| Bovis Homes | | Barton Rd/ Pakenham Rd | B | A | | B | A |
| Bovis Homes | | Barton (New) Rd/ Mount Rd | D | B | 7 Slight 1 Serious | F | B |

Using the data provided in the various individual assessments which were undertaken on different dates, the two roads and most of the junctions were recorded in AM and PM as "A" which means Free Flow. "B" is Reasonably Unimpeded. "C" is Stable, "D" is Lightly Congested. "E" is Significantly Congested and "F" is Heavily Congested. The after-development estimates were taken to be in 2021 except Bovis Homes who used 2023. Where different arms of a junction had different levels of flow, the highest was recorded above. It is noted that these records show only a slight increase in congestion after the development has gone ahead. However none of these estimates of future traffic took the other proposed developments into consideration only "background growth" and again the Neighbourhood Plan Team is concerned at the cumulative impact all of the developments would have on the current infrastructure.

Currently, with none of these developments completed, the surveys showed congestion points for commuters leaving Thurston for the A14 and A143 at the edges of the village. Thedwastre Road has the one carriageway railway bridge and its junction with Beyton Road on the way to the A14 is shown already as lightly congested. This involves a long queue of vehicles every morning, Monday to Friday at the junction. The mini roundabout near the station is the most likely junction to become more congested when the Granary development, which has already been passed by the planners, is completed. Records indicate that there have already been accidents there. This route leads to the Grade II listed railway bridge where passage is narrow, the road surface is often flooded, the footways are too narrow to be safe and it is another route to the A14, via Mount Road with a junction that is already highly congested with a record of accidents. At the other end of Barton Road the junction with the A143 is already heavily congested and accident-prone.

The Neighbourhood Plan Team recognises that current guidelines on rural traffic in general and in particular TA23/81 which gives official advice on new road developments, emphasises that rural roads should not be planned to carry more than 75% of their capacity, whereas urban roads are acceptable at 85%. This recognises the difference in quality and ambience between rural and urban living. Urbanites may balance long queues of traffic at peak times against shorter routes to work and more amenities close at hand. Village dwellers know how to duck and weave round huge agricultural vehicles travelling along narrow and winding roads and they pull up and give way with a wave, but they don't expect to have urban conditions of continuous traffic flowing through the village, even if it is a smooth flow as judged by most of the assessments done for Thurston. Villagers expect clean air, the opportunity to cross roads on foot without a long wait and the chance to hear birds singing rather than the continuous drone of traffic.

The Neighbourhood Plan Team recognises that Paragraph 17 of the NPPF is given as the justification for planning applications to be accompanied by a Transport Plan as well as a Transport Assessment: "Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."

Following the recommendation by Suffolk County Council, Persimmon Homes, Bovis Homes, Pigeon Developments Ltd and Hopkins Homes have each prepared their Transport Plans. These plans emphasise the opportunities for using public transport, walking (up to 2 km) and cycling. Their aim is clearly to try and reduce the use of private cars, as the plans involve employing someone to monitor the use of private cars in and from the development over a period of five years or so. This would be an intrusion into the private lives of residents which they would have to pay for in the price of the development. The Cycle Trail 51 which is widely quoted is very misleading and should be noted that within the village there is only a short distance along Station Hill and across New Green where it is marked on the ground and separated from other traffic. Children would not be safe to follow it on their own as to access this separated route, they would need to travel along Norton Road and over the crossover close to the junction with Norton Road/Ixworth Road/Station Hill. It should also be noted that should cyclists wish to travel east up Station Hill from Barton Road there are no safe crossing points onto the cycle route and that to access this point, Station Hill would need to be crossed on a bend on a steep hill with poor visibility.

The Neighbourhood Plan Team is therefore concerned that although some of the new applications propose small improvements to footways, crossings, bus shelters and the 30 mile speed limit on Ixworth Road, none of them can substantially improve the key junctions or the railway bridges where conditions will inevitably get worse with any extra traffic. The road system in Thurston was crystallised over a hundred years ago, based on the movement of mainly agricultural vehicles in a rural environment. The borders and junctions of these roads and the railway bridges fitted the traffic flows of that time. In many cases the borders are now built up so that roads cannot be widened and certainly the railway bridges are immovable. Each of the proposed developments would inevitably add more traffic despite efforts to wean people away from driving their own vehicles.

• Social Challenges

The Neighbourhood Plan Team is aware that with all growth the village faces a number of challenges and that whilst there are policies in place to ensure all developments provides a safe community; protects the

environment from adverse impacts; reduces the level of crime or overcomes the fear of crime and provides a safe and secure environment, often the social impact of such growth is overlooked.

As such the Team has drawn up a list of the social challenges that will take place in Thurston with an increase in its population, the findings of which are replicated in the table below:

| Pros of increase in population | Cons of increase in population |
|---|---|
| <p>A new purpose-built primary school, more suited to the 21st century, would contribute to the life of the village.</p> | <p>A larger school will support more housing, which Developers will capitalize on. It will trigger more planning applications with family homes. Suffolk County Council work on 25 primary pupils per 100 houses, so there will be many more children which will affect the social dynamics of the village. Pupils will need appropriate cycle ways and paths to get safely to school, as our current school children do. The possible sites for a new school do not lend themselves so easily to safe walking or cycling. This is unfortunate, as it is valuable time for social interaction of children and parents.</p> |
| <p>Clubs and organizations for all age ranges will have increased numbers and for some this will help their sustainability. This includes the library and churches.</p> | <p>Newcomers to the village will put an extra strain on current organizations. If there are more problems with waiting lists it will give rise to bad feelings. Leaders will need support to ensure that they have enough resources to meet extra demands.</p> <p>The popular children's organizations of Brownies, Scouts and the ATC provide valuable social activities for the youth of the village. For the new children to feel welcome in Thurston and be able to have friendships outside school, it is vital that they are able to access such groups. Finding extra leaders and, possibly venues, will not be easy.</p> <p>The Cavendish Hall and New Green may be over-stretched, including their provision for parking. There will be many more demands on these venues with an increased number of young families.</p> <p>Sports clubs may need extra outdoor facilities. Footballers in the village have already highlighted the need for another pitch so this would be even more of a priority.</p> <p>There would be a rise in cycling on the primary traffic routes, which will also have an increase in vehicular movements, around the village for all age groups. A new larger primary school will increase the number of children cycling to school, but also those cycling as a leisure activity.</p> |
| <p>More residents would support a greater variety of leisure activities than are currently available in the village. Teenagers, particularly, could benefit from this and will find more support for a Skateboard Park.</p> | <p>Difficulties are as described above with leaders and venues.</p> |
| <p>A greater variety of shops and facilities would be supported, giving residents more choice of various facilities within the village. This could be helpful to elderly people who do not want to travel into town.</p> | <p>More shops and other facilities will change the village atmosphere to one of a small town.</p> <p>This will impact on the social dynamics of Thurston, which views itself very much as a village. Residents may resent the extra shops and facilities rather than welcome them. This will, again, give rise to bad feelings towards the new developments.</p> |

| | |
|--|---|
| <p>More residents would help to support and sustain bus and train services, which add to the choice of social activities outside the village.</p> | <p>The pressure on these services is expected to increase with additional use being promoted through each applicant's Travel Plan with the implementation of measures designed to promote sustainable travel. Young families may however travel by car which will see an increase on the current road infrastructure. Unless improvements are made to the car parking facilities at the Railway Station along with additional cycle facilities there will be a detrimental on surrounding residential areas</p> |
| <p>More pressure for a Doctor's surgery or Medical Centre.</p> | <p>Medical provision will be impacted within the health catchment area. Currently the nearest practice does not have sufficient capacity for additional growth resulting from further development. As currently stands NHS England is only looking for a Developer Contribution to increase capacity within the GP catchment area. This increase is unsustainable if all applications were to be determined favorably.</p> |
| <p>Additional footpaths and cycle-ways arising from the new developments would offer more variety of routes for walkers and cyclists. This would help all residents to achieve a healthy life style.</p> | <p>Thurston takes a pride in its footpaths and natural environment. This is the result of well-known residents promoting the paths and looking after its trees and wildlife. A larger population which suddenly arrived in the village would not be familiar with these values and this could also give rise to ill feeling towards newcomers. Such concerns include people not following the country code while walking in the countryside, leading to friction with the landowners. Others are that more dogs may cause problems by being off the lead, worrying live-stock, damaging crops and disturbing ground nesting birds. There is also the matter of dog-mess which is already a cause of irritation if not dealt with correctly.</p> <p>The Suffolk Wildlife reserve at Grove Farm is situated within the Parish of Thurston where walkers can see different habitats, flora and fauna. The reserve can be part of a pleasant destination for leisurely walks and cycle rides. With an increasing population and more visitors, it will be necessary to ensure it is not at risk</p> |

As stated previously whilst the Neighbourhood Plan has not yet reached the stage of allocating sites or proposing policies, it has followed a period of extensive consultation with the public and land owners and agents on the site assessments carried out during Summer - Autumn 2016 following the Neighbourhood Plan Team's Call for Sites of January 2016, under the Parish Housing Land Availability Assessment. Throughout this process of consultation, several issues have arisen which the Neighbourhood Plan Team feel are so major and fundamental as to override any acknowledgment of this site's "slightly positive" assessment.

Overall the Neighbourhood Plan Team recognises that the agents acting on behalf of Hopkins Homes have considered some of the issues and comments raised previously vis-à-vis pedestrian crossings; footpaths; phased development and clustering. However, the team still has the following concerns and would ask the Parish Council to consider its concerns for this application on this site for the following reasons:

- Whilst the provision of 2 crossings is welcomed, the concern is that these are uncontrolled and will cause confusion as in the case of such a crossing located to the south of the development
- road safety issues with emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pokeridge Corner
- road safety with emphasis on the junctions of Norton Road and Ixworth Road for those accessing the Community College at the AM and PM peak times
- impact of the vehicular movements from a single point of entry

- loss of character of the village
- development inappropriate to that of land abutting the countryside
- development inappropriate to that of sites abutting the proposed land – whilst the new outline plans have bungalows backing onto bungalows in existing housing areas, there is a concern that the outline plans show 2.5/3 storey dwellings which are neither in keeping or in conformity with the rest of the village nor suitable for a site in such a location on the edge of a village
- village infrastructure particularly education and medical provision
- type and density of housing mix not in accordance with the Neighbourhood Plan findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people.
- cost of affordable homes for local residents – the application fails to take into account the District Wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

In summary, whilst the Neighbourhood Plan Team recognises the need for future development to take place within Thurston, it still has concerns with this application and does not support the application in its present guise for the concerns outlined above.

Moreover, given the scale of proposed housing development, the Neighbourhood Plan Team would request that the Parish Council requests that the District Council adopts a cohesive approach that looks at the totality of the applications submitted and their impact on all of Thurston's infrastructure and social development.

Yours faithfully,

Victoria S Waples

Victoria S Waples, BA (Hons), CiLCA
Secretary to Thurston Neighbourhood Plan Team

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG



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e-mail: info@thurstonparishcouncil.gov.uk

SENT AS AN E-MAIL

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

February 14th 2017

Dear Mr. Isbell,

Proposal: Planning Application 5010-16 – Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16) @ land to the south of Norton Road

Case Officer: Dylan Jones

The Parish Council acknowledges that this application is a duplicate of that submitted under 2797/16 and recognises that certain aspects of the application have been amended. It recognises that pedestrian crossings, footpaths, phased development and clustering now feature within the new application. However, the Parish Council still has concerns with this site and as such objects to the application in its current guise.

The following reasons should be considered and form the basis for the objection:

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 which 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. At this point development of the site would significantly change the character of the village which is currently rural and would therefore not only be contrary to GP1 – Design and Layout of Development but also be contrary to csfr-fc2 provision and distribution of housing and cor2 development in the countryside and countryside villages.

The Parish Council feels that the application submitted is not sympathetic to the countryside in which it is situated, that it fails to protect the intrinsic character of the countryside by the density and mix of properties being proposed and will compromise the impact of the view of the approaching village when accessed from Norton Road. The Parish Council still holds the view that the internal layout is not in keeping with the area which it abuts and that even a

limited number of 2.5/3 storey development is not a feature of the area immediately adjacent to the site and rather than adding "visual interest and aid legibility" the appearance of such dwellings will be an intrusion and will fail to complement the character of the existing area.

It is further felt that the development of 175 dwellings will intrude into an area of currently open, undeveloped, countryside resulting in an encroachment of built development extending significantly 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, as 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, it is therefore inconsistent with paragraph 58 of the NPPF and that the application, if approved will fail to consider the loss of permanent pastureland, will fail to protect the wildlife habitats at this point in the village and will be contrary to policy CL8 – protecting Wildlife Habitats.

The Parish Council considers that the application has still not considered adequately the current road infrastructure and the negative impact that will be had on road safety. It is still held that the location of the site will have 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).

Whilst it is acknowledged that the application has allowed for the provision of pedestrian crossings, it is noted that these are to be uncontrolled and as such the Parish Council is concerned that this will cause confusion as to rights of way as is the case of such a crossing located to the south of the development. Given that there will be a significant number of children using such crossings to access schools and village facilities the Parish Council would like to see controlled pedestrian crossings as a basic provision. There remains no direct link to National Cycle Route 51, nor adequate pedestrian crossing points at the junction of Norton Road and Ixworth Road for those wishing to access Thurston Community College and the Library.

Given the one entrance the application also fails to address the issue of safe crossing points and access out of the development direct onto Sandpit Lane. 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, regarding the siting of this application, would not support the transition to a low carbon future, 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 notes that the application has allowed for the addition of Bus Shelters outside the site frontage however, it still has concerns that the traffic that will be generated from this site will impact on the existing road network (CS6 – services and infrastructure) and that there will be a reliance on the private motor car to access amenities and services not only within the village but 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. Generally the Parish Council is concerned that the expected daily total of 1005 traffic movements (JMS Transport Assessment 12th May 2016) will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway bridge

crossings on Barton Road, the Priority System on Thedwastre Road and entry and exit points onto the A14.

The Parish Council, until the Order for the Neighbourhood Plan is laid, is expected to respond to current planning applications in line with policies set out in the Mid Suffolk Local Plan. It is recognised and understood that, 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. The Parish Council 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 Meeting held to discuss this application amongst others as well as those of the Neighbourhood Plan Team who are in the process of undertaking a Neighbourhood Plan for Thurston. The Parish Council has received correspondence from the Neighbourhood Plan Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that they are to be included within its submission. It is known that that letter was submitted to the Planning Department at Mid Suffolk on 3rd February and its contents should be taken as being fully endorsed by the Parish Council.

The Parish Council would further wish to reiterate the concerns of the Thurston Neighbourhood Plan Team with regards to the speed at which this and other applications have been submitted for new housing in the village. It is recognised within the village that as a Key Service Centre the village of Thurston will appeal to developers and that a certain amount of growth is desirable and non-objectionable, however the Parish Council is concerned that piecemeal development will have a negative impact on the current infrastructure and that there should be a strict control over new housing proposals and the associated numbers until the general infrastructure of Thurston and the surrounding areas has been given time to absorb new residents and the impacts that this associated growth will have on a rural village.

As such, the Parish Council formally requests that there is a change to the process and approach undertaken by the District Council in dealing with this and the other significant planning applications before it and that they are considered in a holistic manner with the impact from all development being considered once a thorough and engaging review has been undertaken with all the service providers to include NHS England; Education, Highways and Transportation Providers.

As confirmation, whilst the Parish Council recognises that amendments have been made to this application and that some concerns raised under Planning Application 2797/169 have been considered, it continues to object to this application in its current form.

Yours sincerely,

Victoria S Waples

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





Consultation Response Pro forma

| | | | |
|----------|---|--|-----------------------------|
| 1 | Application Number | 5010/16 Norton Road, Thurston | |
| 2 | Date of Response | 17.2.17 | |
| 3 | Responding Officer | Name: | Paul Harrison |
| | | Job Title: | Heritage and Design Officer |
| | | Responding on behalf of... | Heritage |
| 4 | Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application. | <p>1. The Heritage Team considers that the proposal would cause</p> <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because it would erode the rural setting of Manor Farmhouse; the level of harm is considered low. <p>2. The Heritage Team recommends that refinement of the layout and landscaping scheme be pursued; harm should then be weighed against any public benefits of the scheme.</p> | |
| 5 | Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation. | <p>The site and proposal appear unchanged from the previous application 2797/16 and there appears no reason to alter the substance of our comment on that proposal. Short sections are now added with the intention of clarifying the Heritage team's view on the level of harm to the setting of Manor Farmhouse.</p> <p>Statutory duty Recent court rulings have confirmed that the statutory duties in the Planning (Listed Buildings and Conservation Areas) Act 1990 have the effect of a strong presumption against harm to listed buildings and their setting. Any harm is to be given great weight in decision-making. Similarly the National Planning Policy Framework expects great weight to be afforded to the conservation of listed buildings and their setting (conservation being defined as preservation from harm and enhancement where appropriate).</p> <p>The following assessment applies the method set out in Historic England's advice note GPA3 <i>The Setting of Heritage Assets</i>.</p> <p>Heritage assets The site is a large area of agricultural bordering the existing settlement to its west and south. It comes close at its easternmost point to the Church of St Peter, listed Grade II, and at its north-east corner to Manor Farm, listed Grade II*, and its associated barn complex listed</p> | |

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.

| | | |
|----|--|---|
| | | <p>significance of Manor Farmhouse is considered low.</p> <p>Only from the footpath within the site would there be noticeable impact on existing views towards the church with new development to the south of the path. Views across the site would become intermittent rather than interrupted. The impact would be significant in a limited arc of views, and harm would be low.</p> |
| 6. | <p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p> | <p>The illustrative plan shows that open space would be preserved towards the east end of the site, and that housing development would be limited to the level part. A belt of tree planting would run along the north-east edges of the built development. Heritage would recommend that the distribution of open space within the site be re-considered with a view to keeping built development back from the north-eastwards slope. The depth and composition of the north-eastern planting belts should be enhanced; the Landscape Officer's advice should be sought on this point. Amendments along these lines would serve to minimise harmful impact in line with NPPF paragraph 129.</p> |
| 7 | <p>Recommended conditions</p> | |

Please note that this form can be submitted electronically on the Council's 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 Council's website and available to view by the public.

Your ref: 5010/16
Our ref: Thurston – land south of
Norton Road duplicate application
00049275
Date: 18 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Dylan,

Thurston: land south of Norton Road duplicate application– developer contributions

I refer to the outline planning application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpif Lane and Norton Road (duplicate to application 2797/16).

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £37,800 towards libraries provision.

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. The County Council's view is that appropriate mitigation from each of the 'live' planning applications should 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 in which planning obligations are sought by Suffolk County Council 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 123 Infrastructure 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 175 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 seen as 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 21 January 2016 and started charging CIL on planning permissions granted from 11 April 2016. Mid Suffolk are required by Regulation 123 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

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- 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 adopted 123 list.

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

1. **Education.** NPPF paragraph 72 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 | Capacity | | | Actual/Forecast Pupil Numbers | | | | | |
|--|-------------|-------------|-----------|-------------------------------|--------------|--------------|--------------|--------------|--------------|
| | Permanent | 96% | Temporary | Total | 2016-17 | 2017-18 | 2018-19 | 2019-20 | 2020-21 |
| Thurston CE Academy | 210 | 200 | | 200 | 196 | 211 | 212 | 208 | 203 |
| | | 0 | | 0 | | | | | |
| Ixworth Free School (11 - 16) | 597 | 687 | 0 | 667 | 271 | 300 | 342 | 350 | 344 |
| Thurston Community College (11 - 16) | 1500 | 1425 | 0 | 1,425 | 1,561 | 1,500 | 1,585 | 1,647 | 1,647 |
| 11-16 total places | 2097 | 1992 | | 1892 | 1,832 | 1,800 | 1,927 | 1,897 | 1,891 |
| Thurston Community College (with Sixth Form) | 1940 | 1,843 | 0 | 1,843 | 1,828 | 1,849 | 1,862 | 1,872 | 1,868 |

| School level | Minimum pupil yield | Required | Cost per place £ (2016/17) |
|----------------------------------|---------------------|----------|----------------------------|
| Primary school age range, 5-11*: | 43 | 43 | 16,429 |
| High school age range, 11-16: | 31 | 0 | 18,355 |
| Sixth school age range, 16+: | 5 | 0 | 19,907 |

| | |
|--------------------------------|--------------------|
| Total education contributions: | £706,447.00 |
|--------------------------------|--------------------|

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 a number of 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 seen as a far from ideal strategy and should only be considered for a very temporary period because there are a number of 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 at this point in time 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 43 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 175 dwellings it is forecast that 43 primary age pupils will arise
- Therefore 43 pupils x £16,429 per place = **£706,447 (2016/17 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 43 places x £1,294 per place = **£55,642.**

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

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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 is allowed to 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 or not to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would have limited powers to impose this on them. Iain Maxwell (Assistant Senior Infrastructure Officer in SCC's, Children and Young People Service) met with the Head teacher and 3 Governors on Thursday 26th January 2017 to explain the situation. Although there were reservations from the school the overall

response was to accept in principle the installation of the temporary classroom if it was needed, providing there was evidence that the new school would be built and open in the early stages of the housing developments to minimise the length of time the temporary building would remain on site. Formal acceptance in writing from the school has now been received.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction commencing on the new school early on. The costs between renting and buying are comparative. Should developers prefer to rent and pay for installation and removal costs this is acceptable to SCC, and an ongoing rental charge/obligation can be included in the Section 106 agreement. 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 = $\frac{£250,000}{60} = £4,167$
- Primary age pupils arising from this site is 43
- Proportionate contribution towards temporary classroom is 43 pupils x $£4,167$ per place = £179,181

The temporary classroom cost of £250k will be apportioned across all developments that secure planning permission, based on dwelling occupations/pupils arising from each scheme up to the maximum of £250k/60 pupils. The planning obligation will need to be worded in such a way for each scheme that the maximum they will pay will be based on total pupils arising and/or limited to the 60 places. In theory the 5 schemes could proportionately split the £250k cost but have a dwelling occupancy restriction once the 60 places have been used up; or any combination of circumstances which may arise.

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

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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 needs to be undertaken, but the initial view is that in due course 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.** Education for early years should be considered as part of addressing the requirements of 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. The Childcare Act in Section 7 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 Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

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 175 dwellings, the County Council anticipates around 18 pre-school pupils eligible for funded early education. Currently there is sufficient capacity for only 10 pre-school pupils from this development. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 8 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 175 dwellings there is the need for 8 additional places
- Therefore 8 pupils x £8,333 per place = **£66,664 (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

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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.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and 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 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Christopher Fish of Suffolk County Highway Network Management.

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

- 5. Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, 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 Mid Suffolk housing team to identify local housing needs.
- 6. 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

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dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that in considering:

"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 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 WMS took effect from 06 April 2015.

- 7. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

- 8. Superfast broadband.** 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 impacting 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.

- 9. 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.

- 10. Time limit.** The above information is time-limited for 6 months only from the date of this letter.

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I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Strategic Development – Resource Management

cc Neil McManus, SCC
Iain Maxwell, SCC
Peter Robinson, Chairman - Thurston Parish Council
Christine Thurlow, MSDC
Steve Merry, SCC.

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28 February 2017

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

By email only

Hi Dylan

Application: 5010/16

Location: Land to the south of Norton Road, Thurston IP31 3QH

Proposal: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16)

Thank you for consulting Place Services on the above application.

No objection subject to conditions.

Based on the ecological reports provided by the applicant and a site visit carried out on 2 February 2017, I offer the following comments:

Likely Ecological Impacts

Both ecological reports were undertaken by suitably qualified ecologists with the necessary skills and experience to conduct this type of assessments and precautionary measures recommended to maintain biodiversity, protected and priority across the development site.

The Extended Phase 1 habitat survey report (Southern Ecological Solutions, June 2016) identified that except for a hedgerow survey, no additional surveys were considered necessary to assess the likely impacts of the proposed development on biodiversity. This is despite the report noting (para 5.19) that the hedgerow habitats were likely to be of potential value to bats for foraging and /or commuting.

A Hedgerow Survey report (Southern Ecological Solutions, June 2016) has been submitted and confirmed losses of this Priority habitat with recommended mitigation and enhancement measures to avoid significant adverse impacts. However as no bat activity surveys were carried out, the assessment of the hedgerows to be lost to the development did not include any use of them by Annex 2 bat species or significant use by common bat species.



I am concerned therefore that the likely impact of the development on bats (European Protected Species) may have been underestimated. However, given that the hedgerows to be severed are isolated from the network in the wider countryside and bat sensitive lighting is recommended to minimise light falling on boundary trees and hedgerows (using directional LED or lamps fitted with shields), in this instance I am satisfied that no further survey or assessment can be reasonably required as likely impacts can be dealt with by condition of any consent.

Although the report dismisses the likelihood of breeding or wintering birds being present, there is no consideration of use of the site by farmland birds such as skylark. Having visited the site, I consider that the availability of nesting habitat for this species is limited as the boundary trees and hedges mean that the field size is too small for them to attempt nesting, but I would have expected to read a justification such as this to adequately consider this Priority species. The report includes consideration of hedgehogs and brown hare and recommends enhancements including fencing including cut-outs which should be implemented throughout the development.

Recommendations

Subject to the conditions below (based on BS42020 model conditions) in respect of planting and landscaping and a condition to control the design & ecological impact of external lighting, I am satisfied that significant impacts on bats (European Protected Species) can be adequately controlled:

1. CONCURRENT WITH RESERVED MATTERS: EXTERNAL LIGHTING

No external lighting shall be provided within a development area or phase unless details thereof have first been submitted to and approved in writing by the Local Planning Authority. Prior to commencement a detailed lighting scheme for areas to be lit shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall show how and where external lighting will be installed, (through technical specifications and the provision of appropriate lighting contour plans which shall include lux levels of the lighting to be provided), so that it can be;

- a) Clearly demonstrated that areas to be lit have reasonably minimised light pollution, through the use of minimum levels of lighting and features such as full cut off cowls or LED.
- b) Clearly demonstrated that the boundary vegetation to be retained, as well as that to be planted, will not be lit in such a way as to disturb or prevent bats using their territory or having access to their breeding sites and resting places or foraging areas, through the use of minimum levels of lighting and features such as full cut off cowls or LED.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved scheme, and shall be 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.

2. CONCURRENT WITH RESERVED MATTERS: SOFT LANDSCAPING

No development shall commence within a development area or phase, until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for that development area/phase, drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities, weed control protection and maintenance and any tree works to be



undertaken during the course of the development. This scheme shall also include the planting required to provide the necessary ecological mitigation and enhancement identified in the application. Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

3. PROTECTION OF BREEDING BIRDS DURING CONSTRUCTION

No removal of hedgerows, trees or shrubs shall take place in any phase of the development, between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the Local Planning Authority.

4. CONCURRENT WITH RESERVED MATTERS: RECOMMENDATIONS AS SET OUT IN ECOLOGICAL REPORT (BIODIVERSITY MITIGATION AND ENHANCEMENTS)

The development shall be carried out in accordance with the recommendations as set out in Section 5 of the Extended Phase 1 habitat survey report (Southern Ecological Solutions, June 2016)

I have made these recommendations in order to minimise the impact of the proposal on ecology and having due regard for the NPPF and Policy CS5, as well as the statutory obligations of the LPA.

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
07809 314447

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.

Your ref: 5010/16
Our ref: Thurston – land south of Norton Road
duplicate application 00049275
Date: 05 March 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Dylan,

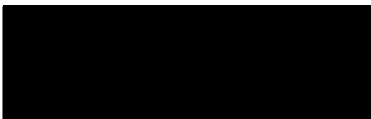
Thurston: land south of Norton Road duplicate application

I refer to the outline planning application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road (duplicate to application 2797/16).

The County Council responded by way of letter dated 18 February 2017 which is still relevant. However this letter provides an update on two issues, namely:

1. Temporary classroom. Whilst these mitigation requirements may still arise in this respect, the District Council's published 123 List contains 'provision of primary school places at existing schools'. So whilst the cost of the temporary classroom will therefore fall to CIL the District will need to report this to committee as a direct cost consequence arising if planning permission is granted and the scheme is built out. On this basis SCC will make a future CIL funding bid to Mid Suffolk District Council.
2. Suggested planning condition restricting dwelling occupations linked with surplus places available at the catchment village primary school. This is a matter for the District to take a view on when considering the application of the 6 tests set out in the National Planning Policy Framework.

Yours sincerely,



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

From: Thurston Parish Council [<mailto:info@thurstonparishcouncil.gov.uk>]
Sent: 17 March 2017 10:10
To: Planning Admin; Philip Isbell; Trevor Saunders
Subject: FW: Saved search results and Tracked Applications have been updated

For the attention of: Dylan Jones

Dear Dylan,

As the case officer tasked with dealing with the Planning Applications listed below may I please confirm that the responses from both Thurston Parish Council and Thurston Neighbourhood Plan Team should be read as one overall response and should form part of the Parish Council's Statutory Consultee response.

Ref: 4386/16 Erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space - Land on the west side of Barton Road, Thurston IP31 3NT

Ref: 4963/16 Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road. - Land west of Ixworth Road, Thurston IP31 3PB

Ref: 5070/16 Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access) - Land at Norton Road, Thurston

Ref 4942/16 Residential development consisting of 64 dwellings and associated highway, car parking and public open space - Land at Meadow Lane, Thurston IP31 3QG

Ref 5010/16 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16 - Land to the south of Norton Road, Thurston IP31 3QH

Should you have any queries on this matter perhaps you would be kind enough to contact me.

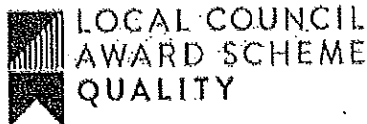
Kind regards

Vicky

Mrs V Waples
Clerk & Proper Officer to Thurston Parish Council
Parish Council Office
New Green Centre
New Green Avenue
Thurston
IP31 3TG

Tel: 01359 232854

Website: Thurston.suffolk.cloud





Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00020546
Local Planning Authority: Mid Suffolk District
Site: Land to the South of Norton Road, Thurston
Proposal: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16)
Planning Application: 5010/16

Prepared by: Sandra Olim

Date: 31 March 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 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

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, via a pumped connection to the public foul sewer in Sandpit Lane at a rate of 3.8l/s. 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 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

Sent: 25 April 2017 16:26

To: Dylan Jones

Subject: RE: Planning applications for 872 houses in Thurston

Dear Dylan, thank you for your enquiry. Of the 6 applications we only responded to 5070/16, the remaining applications had no environmental constraints in our remit.

Flood risk

None of the sites are in areas at risk of fluvial flooding. The assessment of risk of flooding from surface water is a matter for the lead local flood authority; Suffolk County Council.

Foul water disposal

According to our records there should be sufficient headroom within the Thurston Water Recycling Centre permitted Dry Water Flow to accommodate all 827 dwellings. It is important, however, that you consult Anglian Water as they are the only ones that can confirm whether the local foul sewers have sufficient hydraulic capacity.

The developers of each individual site should already have approached AWS with a Pre-development Enquiry. However, depending on the timing of those enquiries they may not have considered the cumulative impacts.

Water supply

Thurston lies in an area of water stress. Our standard water resources comments for this situation are below:

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

The development lies within the area traditionally supplied by Anglian Water Services Ltd. It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. You should seek advice from the water company to find out if this is the case, or a new source needs to be developed or a new abstraction licence is sought. We may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.

THE LOCATION OF DEVELOPMENT SHOULD TAKE INTO CONSIDERATION THE RELATIVE AVAILABILITY OF EXISTING DEVELOPED WATER RESOURCES

The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.

EVERY OPPORTUNITY SHOULD BE TAKEN TO BUILD WATER EFFICIENCY INTO NEW DEVELOPMENTS, AND INNOVATIVE APPROACHES SHOULD BE ENCOURAGED.

We support all initiatives aimed at reducing water use. The extent of water efficiency measures adopted will affect the demand for water for the development and we would expect that this will be taken into consideration. It is assumed that new houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. We support greywater recycling as it has the potential to reduce water consumption in the average household by up to 35% if achieved in a safe and hygienic manner.

It is the responsibility of the applicant to ensure that no local water features (including streams, ponds, lakes, ditches or drains) are detrimentally affected, this includes both licensed and unlicensed abstractions.

If the proposal requires an abstraction licence, it is recommended that the applicant contact our permitting centre. Depending on water resources availability a licence may not be able to be granted.

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

External 02 03 02 58389

Mobile 07845 875238

graham.steel@environment-agency.gov.uk

<https://www.gov.uk/government/organisations/environment-agency>

<https://www.gov.uk/flood-risk-assessment-for-planning-applications>

<https://www.gov.uk/flood-risk-assessment-local-planning-authorities>

Iceni House, Cobham Road, Ipswich, IP3 9JD

Your Ref: MS/5010/16
Our Ref: 570\CON\5010\16
Date: 8th June 2017
Highways Enquiries to: steven.merry@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: planningadmin@babberghmidsuffolk.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/5010/16

PROPOSAL: Outline Planning Application (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane and Norton Road

LOCATION: Land To The South Of, Norton Road, Thurston, IP31 3QH

ROAD CLASS: U

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.

This application is a duplicate of MS/2797/16. A separate response has been provided for that application

Proposed Highway Conditions

Notice is hereby given that the County Council as Highway Authority does not object to the proposal subject to the imposition of the conditions shown below on any permission to be granted and the completion of a S106 planning obligation to its satisfaction:

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

Reason: To ensure that roads/footways are constructed to an acceptable standard.

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

Reason: To ensure that visibility splays and estate roads remain unobstructed by proposed planting in the interests of highway safety; to ensure new trees are not planted too close to carriageways to be lawfully replaced if they become highways and to prevent damage to the roads.

3. 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 construction management 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) protection of important trees, hedgerows and other natural features
- h) protection of the aquatic environment in terms of water quantity and quality
- i) details of proposed means of dust suppression and noise mitigation
- j) details of measures to prevent mud from vehicles leaving the site during construction
- k) haul routes for construction traffic on the highway network and
- l) monitoring and review mechanisms.

~~No works in respect of the construction of the development hereby permitted and no deliveries to the site during construction shall be undertaken at the following times;~~

~~Outside the hours of 0800 – 1800 on Mondays to Fridays (inclusive)~~

~~Outside the hours of 0800 – 1300 on Saturdays~~

~~On Sundays and on public holidays~~

Reason: In the interests of highway safety residential amenity and to ensure compliance with the Local Plan.

Note: the struck through elements of the above condition aren't considered necessary or in deed acceptable by the highway authority but may be relevant for other reasons.

4. Condition: Before the development is commenced details of the areas to be provided for the manoeuvring and parking of vehicles including secure cycle storage and electric vehicle charging infrastructure 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, where on-street parking and manoeuvring would be detrimental to highway safety and further to National Planning Policy Framework paragraph 35.

5. Condition: Before the development is commenced details of the areas to be provided for the storage and presentation for collection 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. This is necessary to avoid inadequate space being provided.

6. Condition: Before the development of each dwelling plot is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development plot and its access onto the estate roads. The approved scheme(s) shall be carried out in their entirety before the dwelling(s) are first occupied and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the estate roads, which are prospective highways. This is necessary to ensure adequate drainage measures can and are installed.

Note: The above condition may be incorporated into an overarching drainage condition.

7. Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. This shall include how the surface water will be disposed of. 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. This is necessary because details have not been submitted to demonstrate how this will be achieved at the proposed access.

8. Condition: No other part of the development shall be commenced until the new access has been laid out and completed in all respects for a minimum 20m from the nearside channel line of Sandpit Lane in accordance with Drawing No. JMS (East Anglia) Ltd drawing no. IP15_127_11_SK002 Rev. C including uncontrolled pedestrian crossing points each side of the access 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.

9. 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: To ensure that satisfactory access is provided for the safety of residents and the public:

10. Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. JMS (East Anglia) Ltd drawing no. IP15_127_11_SK002 Rev. C with an X dimension of 2.4m and a Y dimension of 90m and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (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 entering the highway have sufficient visibility to enter the public highway safely and vehicles on the public highway would have sufficient warning of a vehicle emerging in order to take avoiding action if necessary.

11. Condition: No dwelling shall be occupied until the highway improvements shown on Drawing no. IP15_127_11_SK002 Rev. C are completed. These improvements are a scheme of highway improvements including local carriageway widening, bus stops and footways along Sandpit Lane. The indicative details are acceptable in principle although detailed design will need to be agreed during the S278 agreement process.

Reason: To provide improve the public highway in the interests of public safety and provide a sustainable highway infrastructure.

12. Condition: No dwelling shall be occupied until the highway improvements shown on Drawing no IP15/127/11/SK04 are completed. Drawing IP15/127/11/SK04 shows this footway and appears to be feasible. It is recommended that a footway with street lighting be provided along Church Road to link to the footpath leading to the existing primary school and wider community to the south and the open space.

Reason: To provide a safe link for pedestrians between the site and infrastructure, specifically the primary school, within the village.

Note: The existing street lighting system may be affected by this proposal. The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 01284 758859, in order to agree any necessary alterations/additions to be carried out at the expense of the developer. The design of street lighting and any tree planting interrelate.

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.

S106 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. Highway Improvement Contribution: Improvements to Thurston Footpath 1 between Meadow Lane and Ixworth Road to facilitate better pedestrian access between the site and Ixworth Road.
2. Highway Improvement Contribution: Improve Thurston Footpath 7 north of Meadow Lane to provide improved access to the wider Public Rights of Way network and mitigate increased use by pedestrians
3. Highway Improvement Contribution: Contribution towards a Traffic Regulation Order (TRO) and associated works to extend the existing 30mph of speed limit on Norton Road eastwards beyond Church Road to improve road safety.
4. Highway Improvement Contribution: Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction to provide improved pedestrian access to the Academy and mitigate increase pedestrian and vehicle use.
5. Highway Improvement Contribution: Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton to mitigate congestion at peak periods.
6. Highway Improvement Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a contribution towards 40mph speed limit on the C692 Thurston Road to improve road safety and mitigate increased use.
7. To ensure there is sufficient resource for Suffolk County Council to engage with the Travel Plan and provide assurance that the Travel Plan will be implemented in full; the following Section 106 contributions are required:
8. 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.
9. Travel Plan Implementation Bond, or cash deposit - £118,525 (£593 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

Comments:

1. The reasons for refusal given in my letter dated 27th October 2016 relating to access from Norton Road have been addressed through the revised details including drawing no. Thur/01 Rev C – Development Framework Plan. If considered in isolation from the four subsequent major development applications in Thurston, notably application reference MS/5070/16 on land on the north side (opposite) of Norton Road, there is no reason remaining to refuse the proposal on transport grounds.
2. Improvements to the surfacing of the footpath (Thurston Public Footpath 6), to make it useable all year, can be secured by condition. Likewise, connecting paths into the body of the development must be usable all year. This is directly relevant to the development, as children would not be expected to use this length of Church Road or onsite paths otherwise.
3. Contributions 3 to 8 and the costs attributed to each of the five development sites assume a collaborative approach to mitigating increase use of the public highway resulting from the five proposed developments in the Thurston-area 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. If this development proceeds in isolation and none of the others are granted permission it is considered that Highway Contributions 1, 2, 5, and 8 should be funded in their entirety by this development and a proportional contribution made to Highway Contributions 3,4 and 7.
4. Whereas with no development on the north side of Norton Road there would be little reason for pedestrians from the development to use the footpath between Norton Road and Church Road to access Norton Road. The potential relocation of the primary school would make this route more attractive for residents of the east side of the site and beyond. In the interests of sustainable development overall, safe pedestrian access between the sites should be facilitated or at least not thwarted by the layout of the development.
5. We made advisory comments only regarding internal road layout in my letter dated 27th October 2016. One such comment referred to emergency access and it is noted that the main access road to the east half of the site includes a 3.7m wide footway/cycle track to reduce to a minimum the likelihood of complete obstruction of the sole access route. In addition, the advice regarding preferable tree locations appears to have been heeded.
6. NPPF para. 36 says, '*A key tool to facilitate this [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 Interim Residential Travel Plan (dated 22nd December 2016) that was submitted to support the planning application for 200 dwellings in Thurston has identified some suitable measures and targets to mitigate the impact on the existing highway infrastructure. However, there will need to be some amendments made to the Travel Plan, which are as follows:
7. The nos. 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 also a major 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.

8. The Travel Plan monitoring makes no reference to surveying the residents, only the staff that will work at the proposed Primary School. This will need to be amended to monitor the residential element of the Travel Plan from occupation of the 100th dwelling instead of one year after opening. The monitoring must be undertaken annually for a minimum of five years, or one year after occupation of the final (200th) dwelling, whichever is longest. The Travel Plan must be primarily be monitored by the use of traffic counts, as the resident response rates of Travel Plan surveys on residential developments tend to be very low, even with the use of an incentive. Also the use of traffic counts allows an instant comparison with the expected trip rates provided in the Transport Assessment, as the Travel Plan was mentioned as one of the highway mitigation measures.
9. There is no reference to producing a Full Travel Plan after the baseline monitoring has been completed. The Full Travel Plan must contain the site-specific baseline data and some revised measures should be submitted for approval on occupation of the 100th dwelling.
10. The provision of the monthly rail ticket to Bury St Edmunds, or bus or cycle voucher of equivalent value is a good measure and welcomed by SCC. However, the rail voucher should also cover the cost of travel to Stowmarket as well, due to the existing bus services linking Thurston to Stowmarket being limited for commuting. Also each dwelling should be able to redeem up to two vouchers, as more than one working adult may reside in the dwelling.
11. A revised Travel Plan that takes into account the comments raised above, should be submitted for approval prior to the determination on the application. These revisions need to comply with National Planning Policy Framework paragraph 32. 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.
12. In addition, a good 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).
13. There is potential for increased benefits through combining Travel Plan investment between nearby developments that should be investigated, if or when such other developments are delivered.

Yours sincerely,

Steve Merry
Transport Policy and Development Manager
Strategic Development – Resource Management

From: Khan Wasil [mailto:Wasil.Khan@networkrail.co.uk] **On Behalf Of** Town Planning SE
Sent: 03 May 2017 11:56
To: Planning Admin
Cc: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / (anglia)

Dear Sir/Madam,

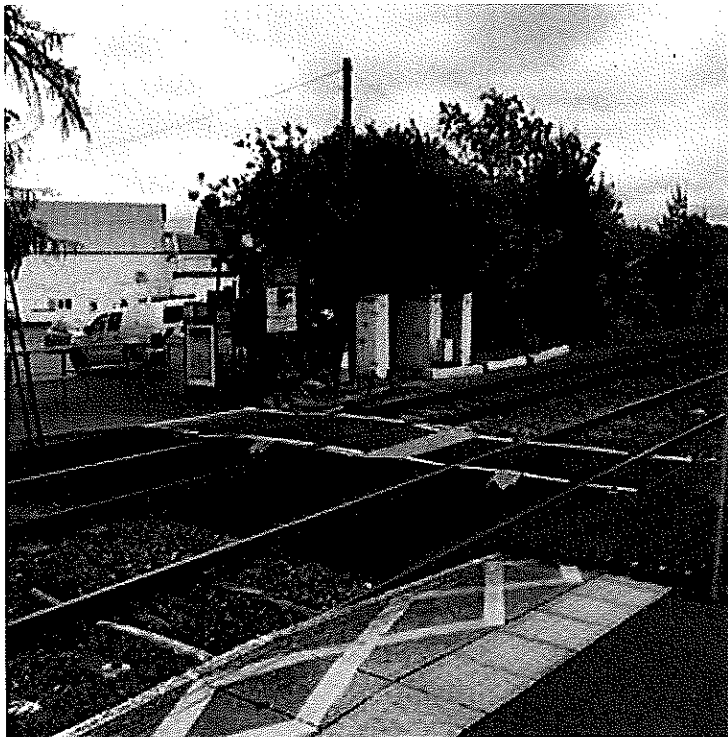
Thank you very much for consulting with Network Rail in regards to application 5070/16 and offering us the opportunity to comment.

We have reviewed the application above and assessed the further combined developments which include the below planning applications.

- 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH – 175 dwellings
- 4963/16 / Land west of Ixworth Road, Thurston IP31 3PB – 250 dwellings
- 4942/16 / Land at Meadow Lane, Thurston IP31 3QG – 64 dwellings
- 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT – 138 dwellings
- 5070/16 - Land at Norton Road, Thurston – 200 dwellings

We note the five submitted developments have a total residential occupancy of approximately 827 units.

It should be noted that Network Rail's strategy is to close level crossings wherever possible as this removes any interface where a person or vehicle could be struck by a train. Therefore the major concern for Network Rail in relation to these proposals, is the Barrow level Crossing at Thurston Station. Historically we have seen a number of issues at this crossing and cannot accept additional impact and further usage unless mitigation and measures are introduced; therefore the preferred option in this location would be to close the level crossing.



The safety justification for closure of the crossing is set out below:

Thurston station level crossing is a footpath crossing with miniature warning lights located at the end of the platforms at Thurston. The crossing traverses two lines and is 8.9m in length, equating to a user requirement of 11.35 seconds to traverse the crossing, with a required sighting distance of 381m, of which there is currently insufficient sighting but this is mitigated by the miniature warning lights.

Trains run frequently over the crossing with approximately 124 trains running at up to 75mph for 24 hours per day with stopping and non-stopping trains.

Particular factors have to be considered for the safety of those using the crossing. Network Rail has a standard Risk Assessment tool called ALCRM (All Level Crossing Risk Model), which determines the predictive level of risk at a level crossing based on a variety of factors, including misuse, train information, number of users, the environment, available sighting etc. Based on the information entered, ALCRM calculates the risk score which generates an individual risk to a user (A to M) and a collective risk (1 to 13) with A and 1 being the highest calculated risk.

Within these risk bands, ALCRM also calculates a Fatality & Weighted Injuries (FWI) score. When the last ALCRM assessment was undertaken in July 2015, Thurston level crossing's risk score was calculated as 0.001924552 (D4), which is outside of ALCRM's high risk categories.

The proposed residential development will see the usage at this crossing increase to a greater level and therefore mitigation options to decrease the risk will need to be explored in order for Network Rail to support the planning application.

Without definitive numbers, the increase in pedestrian footfall has been modelled in ALCRM as follows:

- 75 Pedestrians per day: D4 with a FWI of 0.001924552 (Last census)
- 120 Pedestrians per day: D4 with a FWI of 0.003079283
- 150 Pedestrians per day: D4 with a FWI of 0.003849104
- 200 Pedestrians per day: D3 with a FWI of 0.005132138

As you can see the FWI rises, with 200 pedestrians a day this would move the crossing into a High risk category. Currently a new risk assessment is being carried out and from a safety perspective if the development were to be approved then the level crossing will see a significant increase in pedestrian usage (currently 75 users per day). In all of the aforementioned pedestrian scenarios, there would be a marked increase in the risk profile at this level crossing which would therefore be unacceptable.

Given the increase in risk and increased usage at the station, we believe the development will have a severe effect on safety unless mitigation measures are introduced and contributions are provided in order to fund the closure of the crossing. The measures required to close the crossing are outlined in the attached feasibility report. In light of the 5 applications coming forward, we believe the only fair and reasonable solution would be for the applicants to share the cost of the crossing closure. The cost of the closure is estimated to be £1million, which equates to £1209.19 per dwelling.

Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied by the amount of dwellings which are permitted, to enable the closure of the level crossing.

Reason: To ensure safe and suitable access can be provided in accordance with Paragraph 32 of the NPPF.

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



From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]
Sent: 06 April 2017 15:10
To: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Land at Norton Road, Thurston

Proposal: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us

within 14 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are GP1, NPPF, SC4, Cor4, RT12, CL8, C01/03, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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