

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 – Corporate & Sustainable Planning
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

4th May 2018

Dear Mr. Isbell,

Application: Reserved Matters – DC/18/01376

Proposal: Submission of details under Outline Planning Permission 5010/16 – allowed at appeal – appearance, landscaping, layout and scale for 175 dwellings @ land to the south of Norton Road, Thurston, IP31 3QH

Case Officer: Steven Stroud

The Parish Council, responding to this application which is the submission of reserved matters against outline planning permission 5010/16, as granted under appeal (reference APP/W3520/W/17/3172098), acknowledges that this application covers the appearance, landscaping, layout and scale for 175 and in general is supportive of the application in its present form.

The Parish Council recognises that discussions have been held with representatives of Hopkins Homes, Thurston Parish Council and Thurston Neighbourhood Plan Team prior to the submission of this application and accepts that changes have been made to the layout and the detail within the application and is pleased to note that there are improvements to the pedestrian and cycleway connectivity and the removal of full height 3 storey dwellings from the scheme.

The Parish Council would request that the following comments are considered by Mid Suffolk in the determining of this application:

1. Design – overall the scheme supports a range of house types and tenure with an acknowledged 35% of all units being designated affordable dwellings. The Parish Council is pleased to see the removal of dwellings that fail to neither complement nor enhance their surroundings and supports the building height of two storey or single storey dwellings with a small number of two and a half storey dwellings. It is understood that the affordable housing is mainly to the west of the site and is in

accordance with the mix requested by Mid Suffolk District Council and will follow the build out from west to east. The Parish Council welcomes the variety of house types to be used within the scheme and feels that the varying designs being suggested will be more in-keeping with a village setting. The Parish Council would like to ensure that this is replicated throughout the site as shown in the submitted plans in order to allow smaller areas to create their own identity.

2. Layout – it is recognised that the southern edge of the site has single storey bungalows which will be set back from the boundary and that overall the southern development edge will be designated as a buffer zone along which will be a public footpath. Whilst the Parish Council recognises that the dwellings along the northern edge of the site will be slightly larger and will back onto the retained tree and hedgerow boundary there is a concern that this approach may provide an urban edge to a rural village by the introduction of other types of boundaries. The Parish Council would request that a condition be imposed that ensures the tree and hedgerow boundaries along Norton Road are retained and that ‘hard boundaries’ such as fencing are limited in their use.
3. Connectivity – the Parish Council notes the intention to develop a green route with an informal public footpath along the southern edge of the development which will link up to the footpath running from Norton Road to Church Road and would like to request that, to ensure connectivity between the development and the village, this route be upgraded to a cycle route. It recognises and supports the provision of a cycle path from Sandpit Lane linking to the development to the north of Norton Road.
4. Parking – whilst the Parish Council acknowledges that the parking might be to Suffolk County Council standards per dwelling (and notes that garages are larger than standard with areas for storage) there is a concern that there is insufficient visitor parking allocation. The Parish Council would like to request that this be further scrutinised to ensure that the spinal and smaller tertiary streets are able to be used free of all encumbrances by all users of the Highway network.
5. Lighting – the Parish Council is keen to ensure that lighting used reflects the position of this development in a rural setting and requests that the lighting scheme be appropriate to such a setting – LEDs with subdued lighting with shade being pooled in a downward slant. The Parish Council would also ask that a condition be imposed for all lighting to be sensitive in use and minimise impact on certain species such as bats and glow worms.
6. Traffic calming measures – the Parish Council, whilst recognising that traffic calming and speed reduction is important in ensuring that the highway network is suitable for all users, does not support the introduction of rumble strips on this development. It is felt that this is inappropriate in a village setting and that other measures of traffic calming, if appropriate, should be explored.
7. Open Space & Public Realm – overall the Parish Council is supportive of the open space that has been allocated within the development. It would like to request that it be directly involved in the play provision being proposed along with the overall maintenance of the open space area. The Parish Council would be interested in ensuring that a cumulative response to play provision is held given the five developments that have been granted planning permission in Thurston (1st November 2017). It would ask that prior to agreements being drawn up and/or conditions being imposed concerning play provision and the overall maintenance of the open space areas the Parish Council be consulted on the implementation and future maintenance of these areas. The Parish Council would like to ensure that the open space throughout the area is retained as such and that all reasonable measures be taken to ensure that parking on such green areas is prohibited.

8. Landscaping – overall the Parish Council is supportive of the tree and shrub choice which has a good mix of native and other species. It would appear that the soil conditions have been taken into account and that specimen trees have been chosen for their all year-round interest. The Parish Council is keen to see that any fruit trees to be planted have a Suffolk Connection and that trees such as Rowans and Crab Apples be included within the planting.
9. Management of Open Space and Play Areas – as has been previously stated the Parish Council's preference is for the Parish Council to maintain the open space areas with an agreed funding formula once conditions have been satisfied.

As confirmation, the Parish Council supports this application but requests that the comments raised above are considered during the determination of this application.

Yours sincerely,

Victoria S Waples

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



From:Iain Farquharson
Sent:23 May 2018 16:11:52 +0100
To:BMSDC Planning Area Team Yellow
Subject:M3 240762. MSDC Planning Consultation Request - DC/18/01376

Dear Sir/Madam

The documents received to date do not relate to energy, carbon, or sustainability so this department has no comment at this time.

Iain Farquharson

Senior Environmental Management Officer
Babergh Mid Suffolk Council

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

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

From: BMSDC Planning Area Team Yellow
Sent: 16 April 2018 16:40
To: Environmental Health <Environmental@baberghmidsuffolk.gov.uk>
Subject: MSDC Planning Consultation Request - DC/18/01376

Please find attached planning consultation request letter relating to planning application - DC/18/01376 - Land To The South Of Norton Road, Thurston , IP31 3QH,

Kind Regards

Planning Support Team

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From: Philippa Stroud
Sent: 21 June 2018 10:23
To: BMSDC Planning Mailbox; BMSDC Planning Area Team Yellow
Cc: Steven Stroud
Subject: DC/18/01376 Land to the South of Nordin Road, Thurston - EH Other Issues

WK/240763

APPLICATION FOR RESERVED MATTERS - DC/18/01376

EH - Noise/Odour/Light/Smoke

Proposal: Submission of details under Outline Planning Permission 5010/16
Allowed at appeal - Appearance, Landscaping, Layout and Scale for 175 dwellings.

Location: Land To The South Of Norton Road, Thurston, IP31 3QH

Thank you for your consultation.

I do not have any comments to make with regard to these reserved matters.

Regards,

Philippa Stroud

Senior Environmental Protection Officer

Babergh & Mid Suffolk District Councils - Working Together

t: 01449 724724

e: Philippa.Stroud@baberghmidsuffolk.gov.uk

www.babergh.gov.uk www.midsuffolk.gov.uk

From:Nathan Pittam
Sent:13 Jul 2018 10:42:33 +0100
To:Steven Stroud
Cc:BMSDC Planning Area Team Yellow
Subject:DC/18/01376. Land Contamination.

Dear Steven

EP Reference : 245488

DC/18/01376. Land Contamination.

Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.

Re-consultation: Submission of details under Outline Planning Permission 5010/16 Allowed at appeal - Appearance, Landscaping, Layout and Scale for 175 dwellings.

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no comments to make in relation to this reconsultation.

Kind regards

Nathan

Nathan Pittam BSc. (Hons.) PhD

Senior Environmental Management Officer

Babergh and Mid Suffolk District Councils – Working Together

From:Paul Harrison
Sent:18 Apr 2018 15:35:09 +0100
To:Steven Stroud;BMSDC Planning Area Team Yellow
Subject:DC 18 01376 Thurston

Steven

Heritage do not wish to offer written comment on these reserved matter proposals unless you have queries on particular points (amber triage response).

Please treat this email as the Heritage consultation response.

Paul

Paul Harrison

Heritage and Design Officer

T 01449 724677 | 07798 781360

E paul.harrison@baberghmidsuffolk.gov.uk

E heritage@baberghmidsuffolk.gov.uk

W www.babergh.gov.uk | www.midsuffolk.gov.uk



Have you had your say on **One Council?**

Engagement closes 5 February 2018 | Take part in our online survey here:

www.smartsurvey.co.uk/s/OneCouncil

From:Ipswich, Planning
Sent:13 Jul 2018 09:10:30 +0100
To:BMSDC Planning Area Team Yellow
Subject:RE: MSDC Planning Re-consultation Request - DC/18/01376
Attachments:DM Checklist.docx

Thank you for your consultation request below.

We will however not be returning comments on the proposed development. We have previously returned the consultation request as inappropriate. We have attached our consultation checklist for your reference.

Many thanks

Kind Regards

Natalie Kermath
Sustainable Places Planning Advisor – East Anglia Area (East)
Environment Agency | Icen House, Cobham Road, Ipswich, Suffolk, IP3 9JD

natalie.kermath@environment-agency.gov.uk
External: 020771 41064 | Internal: 41064

National Customer Contact Centre: 03708 506506
(Weekday Daytime calls may cost 8p plus up to 6p per minute from BT Weekend Unlimited. Mobile and other providers' charges may vary.)

Do your future plans have environmental issues or opportunities? Speak to us early!

If you are planning a new project or development, we want to work with you to make the process as smooth as possible. We offer a tailored advice service with an assigned project manager giving you detailed and timely specialist advice. Early engagement can improve subsequent planning and permitting applications to you and your clients' benefit. More information can be found on our website here.

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

From: planningyellow@baberghmidsuffolk.gov.uk [<mailto:planningyellow@baberghmidsuffolk.gov.uk>]
Sent: 10 July 2018 11:36
To: Ipswich, Planning <planning.ipswich@environment-agency.gov.uk>
Subject: MSDC Planning Re-consultation Request - DC/18/01376

Please find attached planning re-consultation request letter relating to planning application - DC/18/01376 - Highfield, Norton Road, Thurston, Bury St Edmunds Suffolk IP31 3QH

Kind Regards

Planning Support Team

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Historic England

EAST OF ENGLAND OFFICE

Mr Steven Stroud
Babergh Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582721

Our ref: **W:** P00865810

18 April 2018

Dear Mr Stroud

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

**LAND TO THE SOUTH OF NORTON ROAD, THURSTON, IP31 3QH
Application No. DC/18/01376**

Thank you for your letter of 16 April 2018 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.

MID SUFFOLK DISTRICT COUNCIL

TO: Steven Stroud – Major Sites

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

Date: 9th May 2018

SUBJECT: Submission of details under outline planning permission 5010/16 allowed at appeal – appearance, landscaping, and layout for 175 dwellings on land south of Norton Road, Thurston (adjacent Highfields).

Consultation Response on Affordable Housing Requirement

Key Points

1. Background Information:

- A development of 175 dwellings.
- This development triggers Local Plan Amended Policy H4 and therefore up to 35% affordable housing would be required on this site.
- Based on 175 dwellings 61 units of affordable housing would be sought. 61 affordable units have been included in the Design and Access statement submitted by Hopkins Homes as agreed at appeal.

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 2017 confirms **a minimum need of 94 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 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 = 61 affordable units
Tenure Split – 60% Rent & 40 % Intermediate e.g. New Build Homebuy accommodation, intermediate rent, shared ownership or starter homes.	<p>Affordable Rent = 38 units (62.3%) All rented units will be let as Affordable Rent Tenancies</p> <p>Intermediate = Shared Ownership = 16 units (26.2%) Intermediate = Starter Homes = 7 units (11.4%)</p>

<p>Detailed Breakdown Rented Units proposed</p>	<p>General Needs Affordable Dwellings:</p> <ul style="list-style-type: none"> • 3 x 1B 2P houses @ 48.6 sqm – we requested at outline for these to be 58 sqm so these are too small. • 10 x 1B 2P flats @ 45.8 sqm – we requested at outline for these to be 50 sqm so these are too small, and we only asked for 6 flats of this size. • 4 x 2B 4P flats FOG's @ 70 sqm – query is around who the garages will be used by? Flats need to be transferred to an RP freehold and affordable homes do not have garages. If garages are for other leaseholder's use these need to be changed to Carports instead of garages, so they can be transferred freehold and not in mixed ownership. • 4 x 1B 2P Bungalows @ 46.5 sqm – we had requested 2 bed 3-person bungalows, not 1 bed roomed. 1 bed bungalows should be sized 50 sqm so are too small if to retained as part of the mix • 8 x 2B 4P Houses @ 79 sqm • 5 x 2 bed 4-person houses @ 81.8 sqm • 3 x 3B 5P Houses @ 93 sqm • 1 x 3B6P Houses @ 102 sqm – down as a 4 bed but better to be provided as a 6-person 3 bed with three double bedrooms. <p>Total = 38 ART's</p>
<p>Detailed Breakdown Intermediate Units</p>	<p>General Needs Shared Ownership dwellings:</p> <ul style="list-style-type: none"> • 11 x 2B 4P Houses @ 79 sqm • 5 x 3B 5P Houses @ 93 sqm <p>Total = 16</p> <p>Starter Home Dwellings: -</p> <ul style="list-style-type: none"> • 2 x 2B4P flats (FOG's) @ 70sqm • 5 x 2B4P houses @ 79 sqm <p>Total = 7</p>
<p>Other requirements</p>	<p>Properties must be built to current Nationally Described Space Standards.</p> <p>The council is granted 100% nomination rights to all the affordable units on first lets and at least 75% on relets.</p>

	The Shared Ownership properties must have an initial purchase limit of 70%.
	The Council will not support a bid for Homes England 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.

Recommendation:

I am pleased to see that 35% affordable housing is included in this Reserved Matters application, however some of the units included need to be adjusted to meet the requirements we set out under Outline application 5010/16 which was won on appeal.

Some of the affordable units are too small and fall short of the space standards expected. Clarification is sought in Section 3 on the inclusion of FOG's and specifically the garages. There is a dominance of 1 bedroomed accommodation being provided which will end up being rented as they are not suitable for shared ownership or starter homes. In total the mix proposed equates to 45.9% of rented as 1 bed flats, houses or bungalows. If the 1 bed bungalows were changed to 2 bed bungalows this mix would be acceptable.

Julie Abbey-Taylor, Professional Lead – Housing Enabling.

The following mix is recommended:

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

From:Consultations (NE)
Sent:23 Apr 2018 12:04:22 +0100
To:BMSDC Planning Area Team Yellow
Subject:application DC/18/01376 consultation response

Dear Sir/Madam

Application ref: DC/18/01376
Our ref: 244356

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
Hannah Bottomley
Natural England
Consultation Service
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

Tel: 0300 060 3900
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

From:BMSDC Planning Area Team Yellow
Sent:09 Aug 2018 09:10:21
To:Rachael.Peters@babberghmidsuffolk.gov.uk,
Subject:FW: Thurston - Hopkins site, DC/18/01376
Attachments:

From: Jason Skilton
Sent: 27 July 2018 08:41
To: Steven Stroud
Cc: Geoff Armstrong; Alex Munro
Subject: RE: Thurston - Hopkins site, DC/18/01376

Hi Steven,

We note the applicant accepts the risk of securing RM approval without final drainage sign off and can remove our objection.

Kind Regards
Jason Skilton
Flood & Water Engineer, Flood & Water Management
Growth, Highways and Infrastructure
Suffolk County Council
Endeavour House, 8 Russell Rd, Ipswich, Suffolk IP1 2BX
Telephone: 01473 260411
Email: jason.skilton@suffolk.gov.uk
Website: www.suffolk.gov.uk

From: RM PROW Planning
Sent: 25 July 2018 11:03
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: RE: MSDC Planning Re-consultation Request - DC/18/01376

For The Attention of: Steven Stroud

Public Rights of Way Response

Thank you for your consultation concerning the above application.

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 6 is recorded through the proposed development area.

Whilst we do not have **any objections** to this proposal, the following informative notes apply.

Informative Notes

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. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

To apply to carry out work on the Public Right of Way or seek a temporary closure, visit <http://www.suffolkpublicrightsofway.org.uk/home/temporary-closure-of-a-public-right-of-way/> or telephone 0345 606 6071.

To apply for structures, such as gates, on a Public Rights of Way, visit <http://www.suffolkpublicrightsofway.org.uk/home/land-manager-information/> or telephone 0345 606 6071.

1. 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. If you wish to build upon, block, divert or extinguish a public right of way within the red lined area marked in the application, an order must be made, confirmed, and brought into effect by the local planning authority, using powers under s257 of the Town and Country Planning Act 1990. In order to avoid delays with the application this should be considered at an early opportunity.
2. 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; any damage resulting from these works must be made good by the applicant.

3. Under Section 167 of the Highways Act 1980 any structural retaining wall within 3.66 metres of the Public Right of Way with a retained height in excess of 1.37 metres must not be constructed without the prior approval of drawings & specifications by Suffolk County Council. The process to be followed to gain approval will depend on the nature and complexity of the proposals. Applicants are strongly encouraged to discuss preliminary proposals at an early stage, such that the likely acceptability of any proposals can be determined, and the process to be followed can be clarified.

Construction of any retaining wall or structure that supports the Public Right of Way or is likely to affect the stability of the right of way may also need prior approval at the discretion of Suffolk County Council.

4. If the Public Right of Way is temporarily affected by works which will require it to be closed, a Traffic Regulation Order will need to be sought from Suffolk County Council.
5. The applicant must have private rights to take motorised vehicles over the Public Right of Way. Without lawful authority it is an offence under the Road Traffic Act 1988 to take a motorised vehicle over a Public Right of Way other than a byway. We do not keep records of private rights and suggest a solicitor is contacted.
 - **Public footpath** – only to be used by people **on foot**, or using a mobility vehicle.
 - **Public bridleway** – in addition to people on foot, bridleways may also be used by someone on a **horse** or someone riding a **bicycle**.
 - **Restricted byway** – has similar status to a bridleway, but can also be used by a 'non-motorised vehicle', for example a **horse and carriage**.
 - **Byway open to all traffic (BOAT)** – can be used by **all vehicles**, including motorised vehicles as well as people on foot, on horse or on a bicycle. In some cases, there may be a Traffic Regulation Order prohibiting forms of use.
6. Public Rights of Way & Access is not responsible for maintenance and repair of the route beyond the wear and tear of normal use for its status and it will seek to recover the costs of any such damage it is required to remedy.
7. There may be other 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.

More information about Public Rights of Way can be found at www.suffolkpublicrightsofway.org.uk

Jennifer Green

Rights of Way and Access

Growth, Highways and Infrastructure, Suffolk County Council
Suffolk Highways, Phoenix House, Goddard Road, Ipswich, IP1 5NP

Your ref: DC/18/01376
Our ref: Thurston – land south of Norton Road
00049275
Date: 02 August 2018
Enquiries to: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Mr Steven Stroud,
Growth & Sustainable Planning,
Mid Suffolk District Council
Endeavour House,
8 Russell Road,
Ipswich,
Suffolk,
IP1 2BX

Dear Steven,

Thurston: land south of Norton Road – reserved matters application

I refer to the proposal: submission of details under outline planning permission 5010/16 allowed at appeal – appearance, landscaping, layout, and scale for 175 dwellings.

Reason(s) for re-consultation: Please see amended plans and documents received 05/07/18 and 06/07/18.

I have no comments to make on the above reserved matters planning application other than the proviso that the terms of the existing planning obligation dated 11 October 2017 associated with appeal reference APP/W3520/W/17/3172098 remains in place.

I have copied this letter to colleagues who deal with highway matters, drainage and archaeology who may have comments to make on the reserved matters application.

Yours sincerely,

Neil McManus BSc (Hons) MRICS
Development Contributions Manager
Growth, Highways & Infrastructure – Strategic Development

cc Sam Harvey, Suffolk County Council
Floods Planning, Suffolk County Council
Suffolk Archaeological Service



Phil Kemp
Design Out Crime Officer
Community Safety Unit
Bury St Edmunds Police Station
Suffolk Constabulary
Raingate Street, Bury St Edmunds, Suffolk, IP33 2AP
Tele: 01284 774141 Fax: 01284 774130
www.suffolk.police.uk

PLANNING APPLICATION: DC/18/01376 Reserved Matters Planning Application
PROPOSAL: Reserved Matters Planning Application for up to 175 residential dwellings
LOCATION: Land to the South Of Norton Road, Thurston, Suffolk
APPLICANT: Mr Geoff Armstrong, Hopkins Homes
PLANNING OFFICER: Mr Steven Stroud

Dear Mr Stroud

Thank you for allowing me to comment on the above Reserved Matters Planning Application for the proposed development of up to 175 residential dwellings on land at Highfield, Norton Road, Thurston.

I have previously commented on application reference: **MS/2797/16**.

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 commend the developers within their covering letter dated 3 Apr 18 with regard to their statement made in relation to paragraph 3.17.7 of the Suffolk Design Guide which states **“that careful design and layout of developments can help make crime more difficult to commit and increase the risk of detection for potential offenders.”**

The planners stating, **“New homes throughout the scheme will be orientated to overlook the street scene and generous areas of open space across the site. This will create both visual interaction and interest throughout the scheme, bolstering the sense of community, as well as lending the proposal to secured by design principles.”**

- 1.1 Bearing this in mind I am disappointed that while there is active surveillance factored in for a number of properties, there is regrettably a lot of rear parking and a number of flying freeholds leading into either rear parking or rear sighted garaging.
- 1.2 The police strongly discourage the siting of rear parking as time and again it has proved to increase theft of and from vehicles, along with criminal damage, anti-social behaviour and graffiti, as these areas allow an offender to go about undetected due to a lack of any form of surveillance from surrounding properties.
- 1.3 Plot 1 and 2 have rear parking allocated and certain plans make it appear that there will be a walkway along plots 2-4. However, the individual perimeter plan shows the front of the area by plot 2 will be bricked off and both plot 2 and plots 3-4 will be close boarder fenced. I am unsure and would appreciate clarification if there will be a gap incorporated that would be big enough for a person to walk down it? If this is the case,



then I would have concerns that it would make it easy for an offender to enter plots 2-4 undetected and would strongly recommend a security gate.

1.4 I have concerns regarding the vulnerability to crime for the parking spaces for plots 1, 2, 5, 6, 18, 19 and 20 as there is only one possible active room window that even then only covers partial possible surveillance for any of the surrounding properties. The inclusion of such a design with limited surveillance also heightens the possibility of making the rear of plots 1, 2 and 4 more susceptible to burglary. I would have preferred if the parking spaces for plots 1-2 could have been incorporated at the front of these properties. I believe that as these two spaces are set so far back from their properties, there is a strong possibility that the owners of these plots, or at least their visitors, will then park half on the pavement and half on the street, causing not only a traffic nuisance but the heightened possibility of Anti-Social Behaviour and Criminal Damage to any such vehicles.

1.5 Plots 3, 4, 7, 8, 36, 37, 43, 44, 48, 49, 50, 51, 69, 70, 81, 82, 83, 84, 105, 106, 154, 158, 159, 160 and 174, all have interconnecting flying freeholds leading to rear parking. As stated, the police do not recommend rear parking because they are well known generators for crime due to lack of surveillance and minimal usage. Flying freeholds afford no surveillance and it is a proven fact that they are well known as congregating areas for Anti-Social Behaviour, including graffiti and arson.

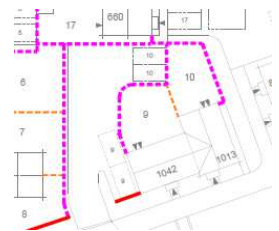


1.6 If these plots have to be designed in this manner, I strongly recommend that security gates are fitted. I also recommend photocell dusk to dawn lighting that meets BS5489:2013 lighting standards are placed on the side of buildings looking onto such areas in order to deter any casual intrusions.

1.7 Plots 1, 2, 5, 6, 10-12, 14,15, 18, 33, 34, 45, 52-60, 65-67, 77-78, 117-121, 131-132, 151-153, 170-172 all have rear parking incorporated, which as previously stated the police do not recommend.

1.8 Plots 3, 4, 7, 8, 13, 35-44, 48-51, 61-64, 68-72, 77, 78, 81-95, 98-113, 115, 134-146, 157-161, 170-172 and 175 have rear garages. I have concerns that as they are set too far back they are easily accessible and more prone to being forced open. I would have preferred it if the garages could have been to the side of the house and the further allocated parking spaces placed in front of these garages so that they would afford surveillance from the front of their plot.

1.9 I have concerns regarding the projected layout for plots 9 and 10, incorporating rear parking for plot 10. The designs indicate there will only be one active window for plot 9, which will look onto the parking space area for that plot and little else, especially if a car is parked there. By incorporating such a design with no real formal or natural surveillance the parking space for plot 10 is made vulnerable to theft either from or of a motor vehicle and it has the knock-on effect of making the rear of plots 6, 7, 8, 9, 10 and 17 more vulnerable to burglary.



1.10 I would like further clarification on how the perimeter for plot 11, where it backs onto plots 16, will comprise. It looks to me like the perimeter will comprise 1.2m metal railings. I note that the designated parking spaces for plots 11 and 12 are at the front of plot 16. So I presume for these owners to access their vehicles a gate, or access area will be in place. I would have preferred it if the parking for these plots could have been at the front to allow the owners easy access to their vehicles and afford surveillance. I would

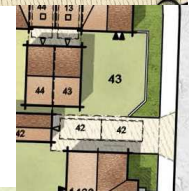


also prefer it if this area was closed off with close boarded 1.8m fencing or a 1.8m brick wall. I would have serious concerns if this area is left open, as it would make it very easy for an offender to come and go. It also makes the rear of plots 10 and 11 more susceptible to burglary.

1.11 I have concerns that the rear of plots 24-25 can easily be accessible as plot 23 does not have a garage and incorporates open air parking that would allow an offender easy access to the rear of these two properties.



1.12 Plot 42 is of a similar design where it has open parking by the rear of plot 43, making that area more vulnerable too.



1.13 I have concerns at the way the perimeter hedging at the rear of the Victoria Public House appears to stop by plot 25, leaving an open area for people to congregate around this plot, for plots 26-29 and plot 31. I would have preferred it if the perimeter border could have been continuous all along that side and that it preferably consisted of defensive vegetation, such as hawthorn, blackthorn, holly or berberis etc. to further reinforce this area as a defensive boundary. This would also prevent persons congregating round the back of plot 25.

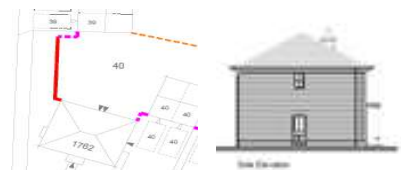


1.14 I have concerns regarding the pathway and large open area by the rear of plot 34 as I feel this could be a congregating area for Anti-Social Behaviour and an inviting area for offenders to enter the rear of this property unseen.



1.15 I would like clarification as to whether or not there will be a dedicated footpath leading from plots 37-41 and to the allotments area. If there is, then again I have concerns that such a footpath will increase the risk of burglary at the rear of these plots.

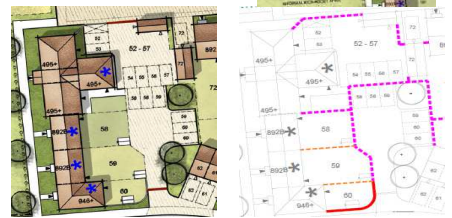
1.16 I would have preferred it if the side perimeter for plot 40 could have been extended further to protect and encapsulate the allocated side door area.



1.17 I have concerns that the area between the allotments and the kick about area are too open and will lead to persons playing within this area going onto allotments and causing possible damage. I would like to see better security for the area around the allotments with 1.8m weld mesh fencing and a lockable security gate. With preferably just one way in and out.

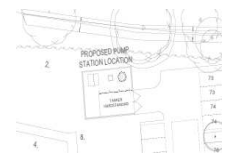


1.18 The perimeter fence map shows the front of the parking area for plots 52-57 will comprise 1.8m fencing, but I take it this is not the case, as it is the main point of entry and exit. I am glad to see that 1.8m close boarded fencing has been incorporated between the parking bays for plots 52-57 and on the other side 58-60.



1.19 I have serious concerns regarding the sighting of rear car parking for plots 52-60. If cars are parked within bays 59-60, there will be no other form of surveillance within that area, and will hide anyone loitering about in the area and give them easy access to the rear of plots 61 and 72.

1.20 I would like to see greater security measures around the pumping station, such as 1.8 weld mesh fencing around it, with a single lockable gate.



1.21 I have serious concerns that rear parking has been designed for plots 65-67 and how it opens up the possibility of easy access unseen to the rear of plots along with plot 63-69. I also have concerns that while the rear of plots 63 and 69 are fenced off, the walkway along this area, could well be used as either a short cut, or for offenders to use, which could well lead to the deterioration of that fenced area.



1.22 I have serious concerns at the number of elongated alleys that have been incorporated such as between plots 74-75 to gain access to the rear of plot 76. Along with plots 124-125 for access to plot 126. Along with plot 130 to gain access to plot 129. Along plot 148 to gain access to plot 149.



1.23 I have serious concerns regarding the rear parking for plots 117 and 119. Again there is limited surveillance for this area and by implementing a drive in courtyard to gain access for these spaces it heightens the possibility of an offender coming in unnoticed to enter the rear of plots 112, 114-117 and 119. Again I hope that the developers will reconsider and not instigate this type of design.



1.24 I have serious concerns regarding the rear parking spaces for plots 150-153. As per my comments above at para 1.23, there is limited surveillance and this type of design will it heighten the possibility of an offender coming in unnoticed to enter the rear of plots 140, 142, 145, 146 and 150.



1.25 I have serious concerns at the siting of pot 154, which also has a flying free hold for access to a rear courtyard parking area. There is very little surveillance from this plot and none for the rear courtyard area. I believe this will make this area very vulnerable to car crime for the 4 spaces for plots 155-156. It will also increase the risk within this area of anti-social behaviour and the possibility of arson, along with burglary to the rear of plots 150-153 and 155. I strongly recommend this type of design is not incorporated and if it is then this free hold area needs to be security gated and security lighting installed.



1.26 I have serious similar concerns for the siting of plot 174 which again has a flying freehold for access to a rear courtyard for parking. Again there is very little surveillance from this plot and none for the rear courtyard area. I believe this too will make this area very vulnerable to car crime for the car parking spaces and garages for plots 173 and 175, along with the parking space for plot 174. Again heightening the same crime problems as mentioned above in para 1.24. Increasing the risk of burglary to the rear of plots 162-165, 173 and 175. I strongly recommend this type of design is not incorporated and if it is then this free hold area needs to be security gated and security lighting installed.



1.27 I have serious concerns regarding the positioning of rear garages and parking for plots 170-172, for the same reasons as stated above at para 1.23. The parking for plot 172 particularly seems rather far away from the main property. I also have concerns that while the rear of plots 166 and 171 are fenced off, the walkway along this area, could well be used as either a short cut or for offenders to use, which could well lead to the deterioration of that fenced



area, as previously stated at para 1.21.

- 1.28 I have serious concerns regarding the footpaths on the eastern side of the development that lead to and from the area of the local church. If these areas are not sufficiently wide enough and not sufficiently lit I believe they will be a major generator for crime, especially as shown right at the major intersection, where if a victim was approached by an offender that offender has various ways to then leave.



- 1.29 Using the principles of “Secure By Design New Homes 2016.” I urge the developers to make the width of all main communal footpaths at least 3m across to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles. Where vegetation is incorporated either side of any footpath, I recommend that it is low growing and regularly maintained, to prevent hiding places for any would be offender. (SBD 2016, pages 14-17 at Paras 8.1-8.19 refer).
- 1.30 I have serious concerns that there will be a number of gable end walls, where person(s) could congregate and lead to the possibility of graffiti or other types of anti-social behaviour. Police prefer such areas are perimetered off with low lying hedging, planting or picket fencing. SBD New Homes 2016 refers under “Gable End Walls” at para 12.1-12.2.2, page 21.
- 1.31 I would like to know how the whole area will be lit. In particular I would like to know how the main focal perimeter footpaths will be lit.
- 1.32 I hope the developers will reconsider their design and drastically reduce the number of rear parking areas, to allow vehicles and all persons to be observed from active windows within their respective properties and from neighbouring properties too.
- 1.33 I would prefer it if the designers rethink their proposals for incorporating flying freeholds and that as many lockable garages can be incorporated that are to the side of the property, with further additional parking spaces at the front of the property.
- 1.34 Further recommendations on parking can be found within “Secure By Design (SBD) New Homes 2016” section 1, at para 16 entitled “Car Parking”, para 16.1- 16.7, pages 22-23. Along with section 3 at para 52, also entitled “Car Parking”, para 52.1-52.2, pages 62-63.
- 1.35 Open Public Space: Such areas should be designed so that it could not be used as parking areas etc. or an area for motor bikes/peds etc. to ride on. Secure fencing should be considered around the area. A maintenance and management plan should be observed and maintenance vehicle access should therefore be secure.

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 dis-order.
- 2.12 The National Planning Policy Frame work 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 plays 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 CONCLUSION

- 3.1** 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.
- 3.2** **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/>**
- 3.3** 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.

- 3.4** **To reiterate, my main concerns are:**
- a) **With regard to the incorporation of rear parking, which is a known generator for crime, as it provides no natural surveillance.**
 - b) **To know more about where visitor parking will be allocated.**
 - c) **Garages sited so far to the rear of properties.**
 - d) **The incorporation of Flying Freeholds, which again is a well-known generator for crime, especially car crime and Anti-Social Behaviour, including Graffiti and Arson.**
 - e) **That perimeter hedging does not seem to be incorporated all along the rear of major areas of the development.**
 - f) **That the perimeter pathways could assist an offender either to commit burglary or commit, some other kind of offence along the pathway, if the area is not wide enough or well-lit and afforded surveillance from nearby housing.**
 - g) **The pathways on the eastern side linking the west to the local church area, if they are not wide enough or well lit, I can see that being a generator for crime.**
 - h) **The need for defensive vegetation all around the main outer perimeter of the site, especially on the northern side behind the Victoria public house area, where it is most vulnerable.**

- i) The number of elongated alleyways, which act as crime generators and allow offenders access to other properties too.**
- j) Areas where there is fencing that could lead to offenders breaking them down or damaging them in order to use them as a quick point of entry and exit, such as by plots 2-4 and plot 11 where it backs onto plot 16.**
- k) That there seems to be no security around the pumping station, such as a 1.8m all round weld mesh security fence.**

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, Raingate Street,
Bury St Edmunds, Suffolk, IP33 2AP

Subject:FW: 18.1376 Norton Road, Thurston

From: Fiona Cairns

Sent: 16 July 2018 10:13:19

To: Steven Stroud

Subject: 18.1376 Norton Road, Thurston

Dear Steven

Thanks for consulting the SPS on this application. Our previous comments related to the countryside edge of the development and we are pleased to note that the open space is located at the far east end of the site, thereby achieving a better integration between the development boundary and the wider countryside. We do not wish to make further comments on this case.

Regards

Fiona

Fiona Cairns

BA(Hons) DipTP DipBldgCons(RICS) MRTPI IHBC

Director

Suffolk Preservation Society

Little Hall

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Lavenham

Sudbury CO10 9QZ