

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG



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SENT AS AN E-MAIL

Mr. P Isbell
Chief Planning Officer –Sustainable Communities
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

4th September 2019

Dear Mr. Isbell,

Proposal: Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).

Location: Land South West Of, Beyton Road, Thurston, Suffolk.

Case Officer: Vincent Pearce

The Parish Council, having considered this application at an extraordinary Parish Council Meeting on 28th August 2019, would like to confirm that it objects to this application in its entirety with particular concerns raised as below.

Whilst it acknowledges that the applicant has actively engaged with the Parish Council on a number of concerns raised at pre-application and post submission stage, and should be commended on its ecological report which was detailed and thorough, overall it was felt that the proposal failed to take full regard of the policies contained within the Thurston Neighbourhood Development Plan (NDP) which, having passed examination stage, is due to be put to a referendum vote on 12th September 2019. The Examiner concluded that, subject to amendments as highlighted by the examiner, and which do not significantly or substantially alter the intention or nature of the Draft Plan, the NDP as submitted meets the Basic Conditions and should proceed to Referendum. It was felt by the examiner that the Thurston NDP will provide a strong practical framework against which decisions on development can be made and as such the Parish Council contends that it is to be regarded as a material consideration in the determination of this application.

1. As has been mentioned by the Parish Council on similar applications for new dwellings outside of the settlement boundary, since 1st November 2017 it has been asked to consider a number of planning applications for new dwellings outside of the Settlement Boundary of Thurston. This application on land to the south west of Beyton Road is outside of the amended built-up area boundary and as such is contrary to not only policies within the Mid Suffolk Local Plan but also the post examination Thurston Neighbourhood Development Plan POLICY 1: THURSTON SPATIAL STRATEGY which states that all new development in Thurston parish shall be focused within the settlement boundary of Thurston village as defined within the Policies Maps on pages 76-77 of the Thurston Neighbourhood Plan.
2. As the proposed development is outside of the current defined settlement boundary allocated by Mid Suffolk District Council for Thurston, it is also contrary to the spatial strategy in Policy CS1 of the Core Strategy. Being in conflict with Policy CS1 would also bring it in conflict with Policies FC1 and FC1.1 of the Core Strategy Focused Review (Adopted December 2012). The conflict with the development plan would therefore be an adverse impact of the proposed development.
3. The general approach in the Thurston Neighbourhood Plan, fully supported by the Parish Council is that growth will be focused on the 5 significant sites which were granted planning permission as of 2017 (which are located within the settlement boundary as amended by the Neighbourhood Plan) and on small scale infill

sites within the settlement boundary. As these sites are expected to provide high quality schemes which generally enhance the public realm and improve accessibility for pedestrians and cyclists, it is felt that this proposal will neither enhance nor protect the village facilities given its location outside of the settlement boundary.

4. The granting of planning permission on 5 sites in late 2017 has meant that there are over 1,000 dwellings in the planning pipeline for Thurston, i.e. with planning permission but not yet built or occupied. Given the levels of growth in the planning pipeline; the previously raised fundamental concerns of the Suffolk County Council Highways Team about highway capacity; and the need to deliver major new education infrastructure in the form of a larger primary school on a new site, the Parish Council contends that Thurston should not be expected to accommodate any additional growth outside of the settlement boundary as revised.
5. Thurston Spatial Strategy provides a provision for the support of development proposals outside of the settlement boundary to come forward that meet specialist housing and care needs on sites where it can be demonstrated that no available and deliverable site exists within the settlement boundary. The proposal submitted by the applicant has failed to offer any such proposals but has merely sought to reflect the mix already being offered by the five significant planning applications granted approval in 2017 for 818 dwellings.
6. Whilst the Parish Council acknowledges that the proposal compromises market and affordable housing and in part conforms to the Thurston NDP Policy 2: Meeting Thurston's Housing Needs, it fails to take into account that the parish of Thurston already has over 1,000 approved dwellings in the pipeline with 35% of these being affordable and a number being provided as shared ownership which will be of particular benefit to younger people wishing to access the housing market. The Parish Council therefore contends that this proposal offers nothing further to the parish in terms of provision.
7. Acknowledging that the proposal may well include bungalows (with the precise number and nature of these being determined under a reserve matters application), the Parish Council is concerned at the lack of detail on the number to be included within the proposal and would comment that in order to be in conformity with Policy 2 Part E more than 12 bungalows (as indicated at the meeting with representatives from Bloor Homes on 23rd August 2019) should be included within any such proposal.
8. The applicant has also failed to respond to the consultative findings of the Thurston NDP which reflected residents desire and support for houses in groups of no more than 50 dwellings and there is a general concern over the indicative house types, in particular the size of the smaller dwellings, and would request that all future applications for housing in not only Thurston, but also Mid Suffolk, have a requirement that all properties are to be built to current Nationally Described Space Standards as published March 2015.
9. As has been mentioned by the Parish Council on previous occasions, it was considered that approval of 818 dwellings at the Mid Suffolk Planning Referrals Committee Meeting on 1st November 2017 was a level of development that was of such a strategic scale that a cumulative approach was required through the planning process to provide improvements to mitigate against any severe impacts to ensure that they did not result in unsustainable growth of the village. The Parish Council is concerned that additional growth such as that now being considered, is unsustainable, unsafe and will have a severe impact on the Highway Network in and around Thurston.
10. Thurston Parish Council objects to this application on the grounds that, to date, SCC Highways Authority have not indicated as to whether there are any further mitigation measures that have been identified that will provide solutions to the severe negative impact that additional growth will have on the Highway Network and draws reference to the letter submitted by SCC Highways (Steve Merry (SCC) to Ben Elvin (MSDC) 13 Oct 2017) who raised concerns that, following mitigation measures being implemented (for those planning applications approved at the meeting of 1st November 2017), the roads in and around Thurston will be operating at capacity if all the developments go ahead. In his letter it is stated:

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

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

11. The position stated above has been referenced in the letter submitted by SCC Highways (Samantha Harvey (SCC) to Vincent Pearce (MSDC) which has confirmed that the improvements planned for the permitted developments north of the railway line were only to a level to mitigate their harm and had little, if any, residual capacity in terms of congestion and road safety. The letter further identifies that a suite of improvements, in the opinion of the Local Highways Authority, mitigated the harm of these five developments but took the infrastructure to its maximum in terms of safety and capacity.
12. Whilst the Parish Council acknowledges that the applicant has provided details of proposed infrastructure to be secured through planning obligations as part of the proposed development:
- Highway junction improvements at Fishwick Corner.
 - Highway junction improvements at Pokeridge Corner.
 - Highway junction improvements at Beyton Road / Barton Road.
 - Widening of footway under the railway bridge and realignment of the carriageway; together with alteration to the Station Road / Barton Road roundabout to account for this realignment.
 - Traffic calming on Beyton Road.
 - Reduced speed limit of 30mph on Mount Road East to Fishwick Corner
- it has overall concerns at the impact these proposals will have on highway safety for all users of the highway network.
13. The Parish Council would request that consultation be had with Suffolk County Highways on the solution being proposed by the applicant for highway junction improvements at Fishwick Corner which involve the utilisation of land outside of highways land to deliver an improvement in the form of the realignment of New Road/Barton Road to create a staggered junction. It is concerned that this staggered junction will result in any vehicles leaving the village to access the A14 for BSE/Cambridge at the slip road by Rougham Hall Nurseries having to turn left and then wait in the middle of Mount Road to turn right. he proposed. On-coming traffic will therefore be approaching from around a blind bend where accidents regularly occur (statistics are available). With the addition of the proposed southern access to the Bloor site onto Mount Road, the Parish Council is concerned at the overall impact this will have on highway safety at one of the most dangerous junctions in the village. There is a further concern that the proposal being offered will effectively release the adjacent field to the West of New Road/Barton Road for further development.
14. Whilst the reduction of the speed limit of 30mph on Mount Road East to Fishwick Corner is to be supported, given that the proposal has a southern access point along this route the comments made under 13 above are of equal importance.
15. In addition, the decision taken by Suffolk County Council to implement changes to its School Travel and Post-16 Travel Policy by only providing children aged 4-16 years old with transport to their nearest school with an available place (phasing in the policy from September 2019) will impact on the Thurston Community College which has a wide catchment area. Evidence has shown that a significant number of parents have continued to support their school choice and as such there will be a negative impact on the rural infrastructure with the increase in the numbers travelling to and from school via car. No account of the increase in traffic movement has been given weight by the applicant and the Parish Council would request that the applicant be required to fully address the cumulative impact of this development on Highway Safety.
16. The applicant has also failed to take into account and sought to mitigate the cumulative impact its development will have on the areas mentioned in 10 and 12 and has relied on the findings of the AECOM report produced in 2017. The Parish Council would expect to see further transport assessment on all of the junctions named above also taking into account the change in the Suffolk County Council School Travel and Post-16 Travel Policy, the proposed expansion of the Thurston Community College (in response to growth in its catchment area) and to provide sufficient information to allow the impact of the additional traffic from the development on the highway network as a whole.
17. Of equal concern is also the failure by the applicant to consider the main access route for those from the south of the village to the current and future location of the Thurston Primary Academy. This access route is via the priority system on Thedwastre Road over the railway bridge which has no footpath for pedestrians. The increase of vulnerable persons - pedestrians and cyclists - along this route has not been considered by the applicant and the Parish Council is concerned that no measures have been proposed that will provide mitigation measures that will ensure that the highway safety for all users, not least the most vulnerable, is not severely impacted.
18. Thurston NDP Policy 6 expects that all new developments must ensure safe pedestrian and cycle access to link up with existing pavements and cycle infrastructure that directly connect with the Key Movement Routes as identified on the Policies Maps on pages 75-76 of the Thurston NDP. Such routes should also ensure that access by disabled users and users of mobility scooters is secured. The Parish Council considers that the proposal to widen the footway under the railway bridge by realigning the carriageway, together with an

alteration to the Station Road/Barton Road roundabout to account for this realignment with a further mini roundabout to the south of the railway bridge will severely compromise the safety of cyclists using the route to gain access to the facilities of the village and overall will fail to alleviate capacity improvements. Thurston is a rural village and traffic assessments most suited for towns instead of villages gives optimistic trip movements and therefore fail to realistically reflect the true movement of traffic in a rural village.

19. Whilst the Parish Council acknowledges that the proposal has traffic calming measures on Beyton Road by installing a raised table to slow traffic, the Parish Council, as has been stated on previous applications, maintains that such tables provide confusion for all users of the Highway and in particular those most vulnerable users. Furthermore the installation of an uncontrolled (ie without traffic lights) pedestrian crossing in the vicinity of Pokeriage Corner will impact on vulnerable and disabled users and will fail to provide safety for vehicles, pedestrians and cyclists alike. The Parish Council would request that further assessment on the cumulative capacity of this junction from approved and pending applications (taking into consideration comments above) is carried out to ensure that capacity levels are not exceeded, and the impact is not now considered to be severe.
20. Given the desire to promote sustainable travel further, the proposal fails to consider the impact on passenger safety on the Thurston Level Crossing at the railway station as the proposal is likely to increase the numbers using the railway station which will negatively impact the risk to users of the railway. The Parish Council draws reference on the email submitted on 30th August 2019 from Nick Donoghue of Network Rail which has stated that the proposal for 210 new dwellings is likely to increase the amount of level crossing users increasing the risk to the operational railway. The Parish Council contends that no proposals have been provided that will allow those to the south of the railway line to access the railway station in a manner that is deemed to be safe for all users. The Parish Council notes that the detailed assessment of the cumulative risk to users of the railway station has not been updated since 2017 and seeks reassurance that the Local Planning Authority will undertake measures to ensure that the most up-to-date information on the cumulative impact on the railway station from development planned for Thurston is obtained from Network Rail.
21. The application also fails to demonstrate that it has taken into account the impact on primary educational infrastructure. It was agreed that, to provide an adequate educational infrastructure for not only the five significant applications of 2017, but also the applications currently in the planning system (as at 2017) that a new school would be required with a capacity of 420. The current school has a pan number for 2019/20 of 30 giving a potential roll of 210. Using Suffolk County Council matrix for approvals within the planning system a further 211 places are required. This proposal will give rise to a potential further 53 pupils which is not taken into account in the determination of the size of school being built. Whilst Suffolk County Council Schools Infrastructure Team have confirmed that the County has 'master planned' the new school site for future expansion, if it were required, to 630 primary places there are no detailed plans of what the accommodation would comprise, and plans are underway to build a school with a capacity of 420 only.
22. As Mid Suffolk District Council has recently provided evidence that it has a five-year supply of deliverable housing land available, which includes a 20% buffer, the Parish Council contends that the benefits of the development, taken cumulatively, do not outweigh the harm that has been identified above.

The Parish Council would like to state it considers that this application and the one recently submitted by Gladman Developments Ltd are tipping points with no consideration of strategic planning for rapidity of growth and no understanding as to how to assimilate change. Further major changes such as these should be planned properly through further engagement with the neighbourhood plan and the local development plan in order to ensure that they do not result in unsustainable growth of the village and cause considerable harm. The Parish Council expects that prior to further developments such as these being approved for Thurston, an overall study of the total impact on the community, not just in terms of road infrastructure and education, be commissioned to ensure that any further development for Thurston is economically, socially and environmentally sustainable.

In summary, the Parish Council contends that this application should not be supported as it fails to adhere to the main policies in the Thurston NDP. The Parish Council requests that the desires of the community, which were clearly expressed through engagement in the production of the Thurston NDP, are respected and that sites coming forward should demonstrate that they are in conformity with the Thurston NDP.

Yours sincerely,

Victoria S Waples

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

From: Rougham Parish Clerk <parishclerk@rougham.suffolk.gov.uk>

Sent: 17 September 2019 20:06

To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

Subject: RE: DC/19/03486: Land South West Of Beyton Road, Thurston, Suffolk

Importance: High

Dear Katherine

I trust you will be able to consider this consultation response re the above PA, as, unfortunately I had cited the correct day, but the incorrect date. We held our PC Meeting yesterday evening when the above PA was considered.

Members unanimously agreed that, whilst safety has to be improved at Fishwick Corner, it is considered that a roundabout (rather than a staggered junction) would be far more effective. We trust you will take this recommendation into account when determining the PA.

Yours sincerely

P M LAMB (Mrs)
Parish Clerk

With regard to **DC/19/03486** Great Barton Planning Committee has **NO COMMENT** to make.

Regards,

Kate Trevitt

Standing in for Clerk of the Parish Council Mrs. Linda Harley

Planning Application – Consultation Response

Planning Application Reference:	DC/19/03486
Site:	Land South West Of Beyton Road Thurston Suffolk
Proposal:	Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).
Prepared by:	BMSDC Strategic Planning Policy and Infrastructure
Date:	13/01/2020

1. Policy position

The site in question is allocated within the emerging Joint Local Plan (JLP) (July 2019) referenced as LA087. Therefore, up-to-date evidence supports the site and the proposal does not cause any significant undermining conflict with the emerging JLP. Therefore, there is not considered to be any significant conflict with paragraph 49 National Planning Policy Framework (Feb 2019). The principle of the site is encouraged for development in accordance with emerging JLP allocation policy LA087. It is understood the proposal is to provide some significant benefits to Thurston as a whole. Which the case officer will need to balance out the sustainable benefits against the adopted Thurston Neighbourhood Plan (October 2019).

In theory there is considered conflict between the proposal and the adopted Thurston Neighbourhood plan because the application site is outside of the Neighbourhood plan settlement boundary. However, in looking at Figure 13 inset map of detailed locations within the Neighbourhood plan. It is apparent the only sites allocated in the Neighbourhood Plan are those with planning permission, which does not allocate anything new. Technically, it could be argued there is some conflict with paragraph 29 of the NPPF (Feb 2019) insofar as ... 'Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies'. It is also noted the site in question was included within the emerging JLP as part of the August 2017 formal consultation document. Therefore, for some time it has been recognised as an emerging suitable and needed site to meet housing needs. It should also be highlighted even though the Thurston Neighbourhood Plan (October 2019) is recently adopted it also requires current review as the emerging JLP is gaining weight and strategic plan-led direction and is a material consideration in this case in accordance with Section 38(6) PCPA 2004 that states: 'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'.

When the benefits of the proposal and the progressive plan-led approach in this settlement are weighted and balanced and considered against the adopted Thurston Neighbourhood Plan there is considered limited conflict. The application in principle is supported by the strategic planning policy team.

2. Infrastructure Delivery Plan (IDP) position

The IDP (July 2019) sets out both Babergh and Mid Suffolk's infrastructure requirements and priorities. It was published on the 22nd July 2019 as evidence which supports the Joint Local Plan and is an iterative document which will change over time dependent on changing infrastructure capacity, requirements and priorities.

The application site is part of the proposed site allocations of the emerging Joint Local Plan, policy reference LA087. For the purpose of this response, and to understand the impact on infrastructure capacity, the content of the IDP has been considered together with the existing planning permissions and responses from infrastructure providers.

Set out below are the current planning applications (over 10 dwellings) and emerging Joint Local Plan land allocations in Thurston:

Existing permissions

- 3181/13, 2613/11 Thurston Granary, Station Hill - Full permission for 97 dwellings (under construction)
- DC/18/01376, 5010/16 Highfield, Norton Road - Full permission for 175 dwellings (under construction)
- DC/19/01602, 5070/16, Land at Norton Road - Full permission for 200 dwellings (under construction)
- DC/18/03547, 4963/16, Land west of Ixworth Road - Full permission for 250 dwellings (under construction), emerging Joint Local Plan site allocations reference LA088
- DC/17/02232, Land on the West Side of Barton Road - Full permission for 129 dwellings, emerging Joint Local Plan site allocations reference LA090
- 4942/16, Land at Meadow Lane - Full permission for 64 dwellings, emerging Joint Local Plan site allocations reference LA084

Planning applications awaiting determination (other than this application)

- DC/19/02090, Land to the east of Ixworth Road, Outline application for 210 dwellings, emerging Joint Local Plan site allocations reference LA089

Other emerging Joint Local Plan site allocations

- LA085 Land to the East of Church Road and South of Old Post Office Lane - 25 dwellings
- LA086 Land South of Heath Road – 110 dwellings

There are several essential infrastructure needs for Thurston that were identified in our response of the 15/08/2019:

- Education

The IDP states that within Thurston a new pre school setting for 30 places is needed at the relocated new primary school in Thurston. A new primary school is also to be provided in Thurston. This is identified as a 420 places school, which includes the relocation of the existing 210 place primary school. This new primary school would have the potential to provide for this development together with the committed growth and other Joint Local Plan proposed allocations. For the secondary school provision, the expansion of Thurston Community College from 1940 to 2190 places is planned, to provide for this development together with committed and planned growth of the Joint Local Plan. In their response of the 30/07/2019, the County Council have provided the developer contributions expected for both the new provision of primary and

pre-school as s106 and for the expansion of the Thurston Community College as CIL contributions.

- Transport

The IDP states that within Thurston, contributions towards new footway links and traffic calming measures would be required as well as several highway and railway mitigation measures. Specific site details and required contributions are provided through the County Council Highway response. The IDP also refers to developer contributions through CIL which would be required in relation to the Thurston railway station passenger level crossing improvements.

The local junction improvements proposed as part of the scheme for Beyton Road, Pokeridge Corner, Barton Road and Fishwick Corner are essential to the safety and sustainability of the development, as well as for the cumulative impact of the growth in the area, which are supported by the County Council in their response of the 07/01/2020.

- Health

The nearest practice is Woolpit Health Centre, where the IDP refers to expansion of the practice and CIL contributions would be required. The response from the West Suffolk Clinical Commissioning Group of the 12/08/2019 also specifies that developer contributions via CIL are required to meet the cost of additional capital funding for health service provision arising.

3. Summary

It will be essential that the above points are considered in conjunction with the current application process and infrastructure needs must be satisfactorily addressed in accordance with the respective infrastructure providers consultation replies and the IDP.

There is general conformity with elements of the emerging Joint Local Plan land allocation policy LA087 and position of the Neighbourhood Plan is set out above.

In terms of the infrastructure proposed through this development, the identified needs of the IDP are met, primarily in terms of highways mitigation which are identified as essential infrastructure for the delivery for the planned growth of the emerging Joint Local Plan. The scheme contributes to the delivery of key infrastructure required to enable the sustainable growth of the area, such as local junction improvements proposed as well as contributions towards education and health. The highway mitigation measures of this proposal also enables to mitigate the harm of other development proposed such as planning application DC/19/02090, also for 210 dwellings.

The scheme is therefore supported by the Strategic Planning Team.

Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

Planning Application – Consultation Response

Planning Application Reference:	DC/19/03486
Site:	Land South West Of Beyton Road Thurston Suffolk
Proposal:	Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).
Prepared by:	BMSDC Strategic Planning Policy and Infrastructure
Date:	15/08/2019

1. Infrastructure Delivery Plan (IDP) position

The IDP (July 2019) sets out both Babergh and Mid Suffolk’s infrastructure requirements and priorities. It was published on the 22nd July 2019 as evidence which supports the Joint Local Plan and is an iterative document which will change over time dependant on changing infrastructure capacity, requirements and priorities.

There are several essential and critical infrastructure needs for Thurston in the IDP which include:

- Education
 - New Pre School setting for 30 places at the relocated new primary school in Thurston.
 - New Primary School for 420 places in Thurston.
 - Expansion of Thurston Community College from 1940 to 2190 places.
- Transport
 - New footway links.
 - Traffic calming measures (where necessary).
 - Developer contribution through CIL will be required in relation to the Thurston railway station passenger level crossing improvements.
 - Contributions towards the railway station accessibility improvements may also be required.
 - Major accident cluster site at crossways junction of Barton Road and Station Hill. Impact on railway bridge would need to be fully assessed with Transport Assessment.
- Health
 - The nearest practice is Woolpit Health Centre, where the IDP refers to expansion of the practice and CIL contributions would be required.

It will be essential that the above points are considered in conjunction with the current application process and infrastructure needs are addressed in accordance with the respective infrastructure providers consultation replies and the IDP.

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 31 July 2019 12:05
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: DC-19-03486 Consultation Response

Application ref: DC/19/03486
Our ref: 290186

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

Matthew Dean
Operations Delivery
Consultations Team
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



Historic England

Mr Vincent Pearce
Babergh Mid Suffolk
Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

Direct Dial: 01223 582711

Our ref: **W:** P01093190

2 August 2019

Dear Mr Pearce

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

**LAND SOUTH WEST OF BEYTON ROAD, THURSTON, SUFFOLK
Application No. DC/19/03486**

Thank you for your letter of 25 July 2019 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

Joanne Robinson
Business Officer
E-mail: Joanne.Robinson@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Good afternoon,

We have received the attached chase emails. However the consultations are considered inappropriate and do not fall into our remit. If this is incorrect please contact us using the attached checklist to advise why we were consulted.

Kind Regards

Natalie Kermath

Sustainable Places Planning Advisor – East Anglia Area (East)

Environment Agency

From: Donoghue Nicholas <Nicholas.Donoghue@networkrail.co.uk>
Sent: 30 August 2019 14:26
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Cc: Town Planning SE <TownPlanningSE@networkrail.co.uk>
Subject: Network Rail Consultation Response: DC/19/03486

Dear Sir/Madam,

Thank you for consulting Network Rail and apologies for the amount of time it has taken to get these comments back to you.

Network Rail are concerned that this proposal will have a negative impact on Thurston Level Crossing. Thurston station's up platform (trains to Bury St Edmunds, Newmarket, Cambridge, Ely and Peterborough) is currently accessible only by way of a level crossing. The level crossing is fitted with miniature stop lights to make the risk as low as reasonably practicable, however it is still a risk that is uncontrollable because it depends on users understanding and obeying the lights.

The proposal for up to 210 new dwellings is likely to increase the amount of level crossing users therefore increasing the risk to the operational railway. New proposals in the vicinity of the level crossing underline the need for a permanent solution to mitigate the ever-growing risk. Network Rail are currently in discussions with Mid Suffolk District Council regarding the construction of a subway underneath the railway immediately east of New Road underbridge, and a new ramp up to the up platform. Network Rail therefore believe that as this proposal is contributing to the risk, the applicant should contribute to the new access.

Kind regards,

Nick Donoghue
Town Planning Technician | Property
Network Rail
1 Eversholt St | London | NW1 2DN
M 07732 639934
E Nicholas.Donoghue@networkrail.co.uk
www.networkrail.co.uk/property

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Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.



Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 03456 066087, Option 1 or email planningliaison@anglianwater.co.uk

AW Site Reference: 150447/1/0065579

Local Planning Authority: Mid Suffolk District

Site: Land South West Of Beyton Road Thurston Suffolk

Proposal: Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements.

Planning application: DC/19/03486

Prepared by: Pre-Development Team

Date: 29 August 2019

ASSETS

Section 1 - Assets Affected

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

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 - Used Water Network

This response has been based on the following submitted documents: FRA and drainage strategy. 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. It is noted that a pumped regime is required, we therefore ask that the pumped discharge rate/rising main size is agreed at Section 106 stage. (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements

Section 4 - Surface Water Disposal

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.

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.

FOR THE ATTENTION OF THE APPLICANT - if Section 3 or Section 4 condition has been recommended above, please see below information:

Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx>

Once submitted, we will work with you in developing a feasible mitigation solution.

If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
 - Development size
 - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
 - Connecting manhole discharge location (No connections can be made into a public rising main)
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
- Feasible mitigation strategy in agreement with Anglian Water (if required)

Surface water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution, including:
 - Development hectare size
 - Proposed discharge rate (Our minimum discharge rate is 5l/s. The applicant can verify the site's existing 1 in 1 year greenfield run off rate on the following HR Wallingford website -<http://www.uksuds.com/drainage-calculation-tools/greenfield-runoff-rate-estimation> . For Brownfield sites being demolished, the site should be treated as Greenfield. Where this is not practical Anglian Water would assess the roof area of the former development site and subject to capacity, permit the 1 in 1 year calculated rate)
 - Connecting manhole discharge location
- Sufficient evidence to prove that all surface water disposal routes have been explored as detailed in the surface water hierarchy, stipulated in Building Regulations Part H (Our Surface Water Policy can be found on our website)



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Our ref: WSCCG/000719/THU
Email: planning.apps@suffolk.nhs.uk
Date: 12/08/2019

Your Ref: DC/19/03486

Planning and Regulatory Services,
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich
Suffolk, IP1 2BX

Dear Sir/Madam,

Proposal: Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).

Location: Land South West Of, Beyton Road, Thurston, Suffolk

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 210 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 is a GP practice closest to the proposed development and this is within circa 6km. This



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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 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 (m²)²	Capacity ³	Spare Capacity (NIA m²)⁴
Woolpit Health Centre	14,460	705.00	10,281	-299
Total	14,460	705.00	10,281	-299

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. Based on 120m² per 1750 patients (this is considered the current optimal list size for a single GP within the East DCO) Space requirement aligned to 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 Woolpit Health Centre, servicing the residents of this development, 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, the 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.



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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.

Yours faithfully



Chris Crisell
Estates Planning and Project Support Manager
West Suffolk Clinical Commissioning Group

Your Ref:DC/19/03486
Our Ref: SCC/CON/3036/19
Date: 7 January 2020



All planning enquiries should be sent to the Local Planning Authority.

Email: planning@babberghmidsuffolk.gov.uk

The Planning Department
MidSuffolk District Council
Planning Section
1st Floor, Endeavour House
8 Russell Road
Ipswich
Suffolk
IP1 2BX

For the attention of: Vincent Pearce

Dear Vincent,

TOWN AND COUNTRY PLANNING ACT 1990

CONSULTATION RETURN: DC/19/03486

PROPOSAL: Outline Planning Application (some matters reserved - access to be considered) -

Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).

LOCATION: Land south west of Beyton Road Thurston Suffolk

Notice is hereby given that the County Council as Highway Authority recommends that any permission which that Planning Authority may give should include the conditions shown below:

1. Background Information

Following the receipt of five major planning applications for Thurston received in 2017 totalling 827 dwellings, SCC and BMSDC commissioned AECOM to provide a cumulative impact assessment to determine any mitigation required due to the additional traffic generated from the sites. The assessment used the peak hours 8.00 to 9.00 and 17.00 to 18.00hrs (derived from traffic survey evidence). Junctions were modelled to calculate the capacity and queue lengths for future years with the developments and required mitigation measures regarding capacity are:

- Introduction of Traffic signals at A143 Bury Road/Thurston Road junction (locally known as Bunbury Arms Junction) with introduction of 30mph speed limit on commencement of works.
- Change in priorities on C692/C693 Thurston Roads (known as Fishwicks Corner) and introduction of a 40mph speed limit at the junction.

Other mitigation measures requested where safety was a consideration are:

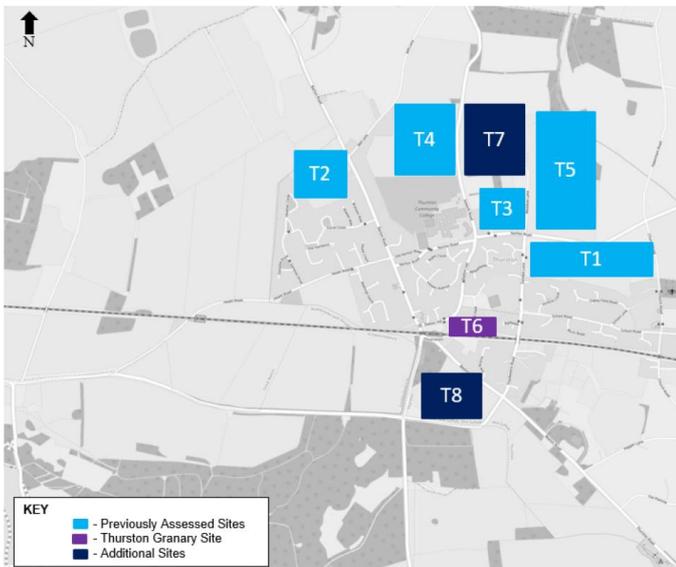
- Improvements to footway network within the village
- Contributions to pedestrian crossings at key junctions and locations
- Extension of 30mph speed limits on Ixworth Road, Barton Road and Norton Road.
- Improvements to the PROW footpath network; contribution of £126,500

In our 2017 response we identified constraints at Bunbury Arms Junction, Fishwicks Corner, Pokeridge Corner and Barton Road under the Rail Bridge which needed to be addressed by any future development. Each location will need to be improved with regard to both capacity and safety and we highlighted that future mitigation was limited by the restricted land available within highway boundary.

2. Highway Assessment of 2019 Applications

In 2019 a further 2 major applications for Thurston were received proposing upto 420 dwellings (210 for each site) bringing the total of 1247 dwellings for 7 sites. AECOM were commissioned by SCC to update the report on the cumulative impact from the 5 original sites (plus The Granary site) to include the 2 new sites for future year 2024. TEMPRO was used to derive the local growth factors for the area. The trip generation applied were those set out in the 2017 transport assessment 0.67 (two-way traffic) giving additional 846 trips in the AM peak and 832 trips in the PM peak from all 7 developments.

The indicative locations of all the development sites and the junctions assessed are shown below:



Locations of Developments



Junction Locations

The junctions assessed are as follows:

- Barton Road/Station Hill mini roundabout
- Pokeridge Corner
- Fishwick Corner
- Station Hill/Ixworth Road/Norton Road junction
- Barton Road/Norton Road junction
- Bunbury Arms junction

By applying the trips from the developments to the existing highway layout, the Ratio of Flow to Capacity (RFC) and Queue lengths (Q) were calculated on the key junctions for future year 2024. Note If the RFC value is 0.85 or less, this indicates the junction is nearing but operating within capacity; 1 being at capacity.

By applying the committed sites, with growth and new trips from the proposed developments, the following table gave a summary of the Junction Capacity Assessments:

	Junction	2024 Base		2024 With Dev (T1 – T6)		2024 With Dev (T1 – T7)		2024 With Dev (T1 – T6 & T8)		2024 With Dev (T1 – T8)	
		AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
J1	C691 Barton Road / C562 Station Hill Three Arm Mini Roundabout	Green	Green	Green	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow
	<i>Proposed Mitigation Scheme</i>	Grey	Grey	Green	Green	Yellow	Green	Green	Green	Yellow	Green
J2	C560 Beyton Road / C692 Thurston Road / U4920 Thedwastre Road Crossroads (Pokeridge Corner)	Green	Green	Yellow	Green	Yellow	Green	Yellow	Green	Yellow	Green
	<i>Proposed Mitigation Scheme</i>	Grey	Grey	Green	Green	Green	Green	Green	Green	Green	Green
J3	C693 Thurston Road / C692 Thurston Road Crossroads (Fishwick Corner)	Yellow	Green	Red	Green	Red	Green	Red	Green	Red	Green
	<i>Proposed Mitigation Scheme</i>	Grey	Grey	Green	Green	Green	Green	Green	Green	Green	Green
J4	C559 Norton Road / C562 Ixworth Road / C562 Station Hill staggered Crossroads	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
J5	C691 Barton Road / C559 Norton Road 'T' Junction	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
J6	A143 / C691 Thurston Road Crossroads	Red	Red	Red	Red	Red	Red	Red	Red	Red	Red
	<i>Proposed Mitigation Scheme</i>	Grey	Grey	Red	Green	Red	Green	Red	Green	Red	Green

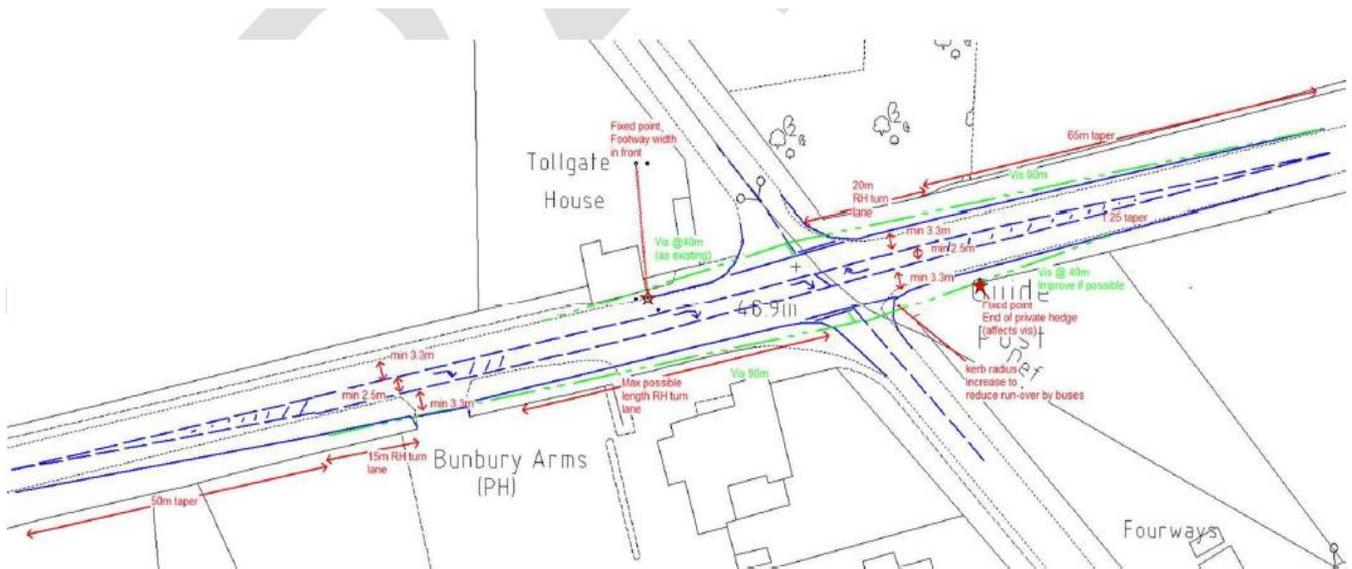
- within theoretical capacity – less than 0.85
- near capacity – between 0.85 and 1.00
- over capacity – over 1.00

The report concluded that the 2 developments shows Barton Road/Station Hill mini roundabout, Fishwick Corner and Pokeridge Corner junctions would all be close to or over capacity. With proposed mitigation from the Beyton Road development, these junctions all operate within desired capacity limits for future year 2024.

The detailed designs of the junctions will be designed to current specifications and standards. A Stage 2 Safety Audit has also been completed on the junctions with the proposed mitigation measures. The audit did not identify major problems and minor items raised can be detailed during the s278 process during our technical approval process.

3. Junction Analysis and Evaluation of the Proposed Mitigation

A143/C691 Bunbury Arms junction

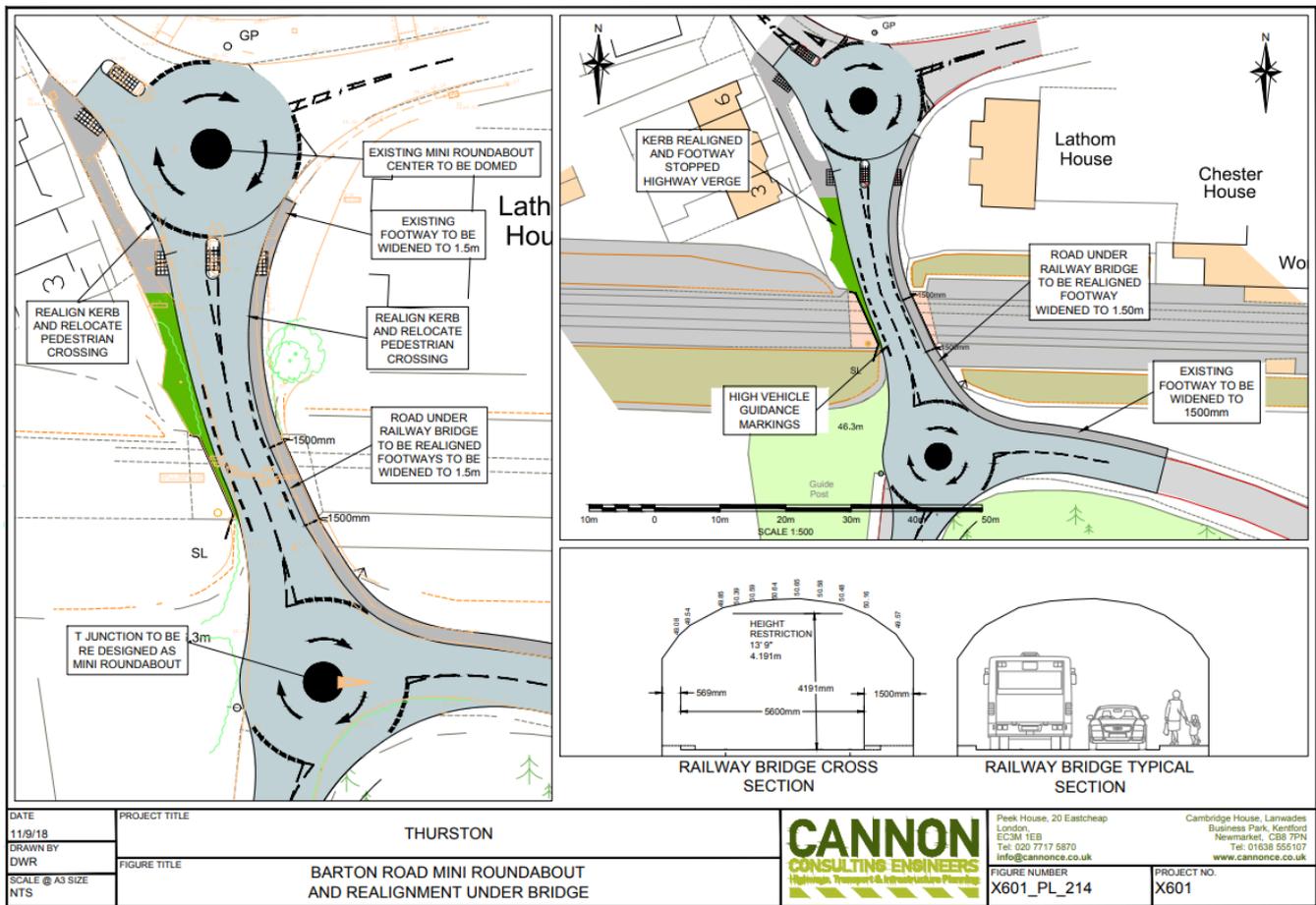


Existing situation	Proposed mitigation
<p>The mitigation from the 2017 developments included signalling the junction. The junction will be at capacity on two arms in the AM peak hour for the granted applications. This was accepted as the developments had mitigated their impact, but it was not possible to fully mitigate the background growth due to space constraints.</p>	<p>The proposed mitigation with contributions from the previous 5 applications, the 2019 AECOM indicates that the one arm of the junction will be over capacity during the AM peak hour and at capacity on two arms. On further assessment of the model data, we believe there is scope to improve the proposed preliminary design of the signals using better software and monitoring systems to improve capacity. However, no further mitigation, in terms of highway layout, is considered possible within the highway boundary.</p>

The impact on this junction is minimal from this development’s traffic as the dominate movement is south or west; towards the A14. Modelling in the applicant’s Transport Assessment shows the junction percentage impact from this site would be less than 1%. It has been assumed that the direction of trips can be based on census data showing their destination. Also, due to its location south of the railway line, it is likely that drivers are more likely to travel via the A14 to reach destinations West and North of Bury St Edmunds and trips via the Bunbury Arms Junction will be less than anticipated.

We also believe that the provision of a signal junction at the A143 junction will potentially result in a redistribution of traffic due to the additional delay for left turn out movements. The signals could also increase the right turn movements from Thurston, as it becomes more attractive manoeuvre no longer being directly opposed.

Barton Road Mini Roundabout and Rail Bridge/Beyton Road junction



Existing situation	Proposed mitigation
<p>Barton Road under the railway bridge has sufficient carriageway width to allow 2 cars to pass. However, with the arch of the bridge, high-sided vehicles have to use the centre of the carriageway to use the maximum height of the bridge, therefore no other vehicles can pass large vehicles except cyclists. Due to the height restriction of the bridge, use by high sided vehicles is restricted (single deck buses can use this route). The footways under the bridge are narrow; where the west footway terminates adjacent to the south-west bridge abutment 490mm wide and the other has a pinch point of 750mm.</p> <p>The carriageway is not parallel with the bridge abutments which restricts the forward visibility from Beyton Road junction under the bridge to 24.5m.</p>	<p>By introducing improvements to the existing mini-roundabout and a new mini-roundabout on the Barton Road/ Beyton Road junction, this improves the RFC for Base + Committed Development + the Development from 1.00 to 0.85 and reducing delays by approx. 60 seconds therefore, improving capacity. By realigning the carriageway parallel with the bridge abutments, will improve the inter-visibility between the junctions on each side of the bridge. Removing the footway on the west side enables the footway on the east to be widened to 1.5m enabling safer passage for pedestrians making an acceptable walking route for existing and new residents. Access for cyclist remains poor as the footway is too narrow restricting them to the road and hence potential conflict with vehicles.</p>

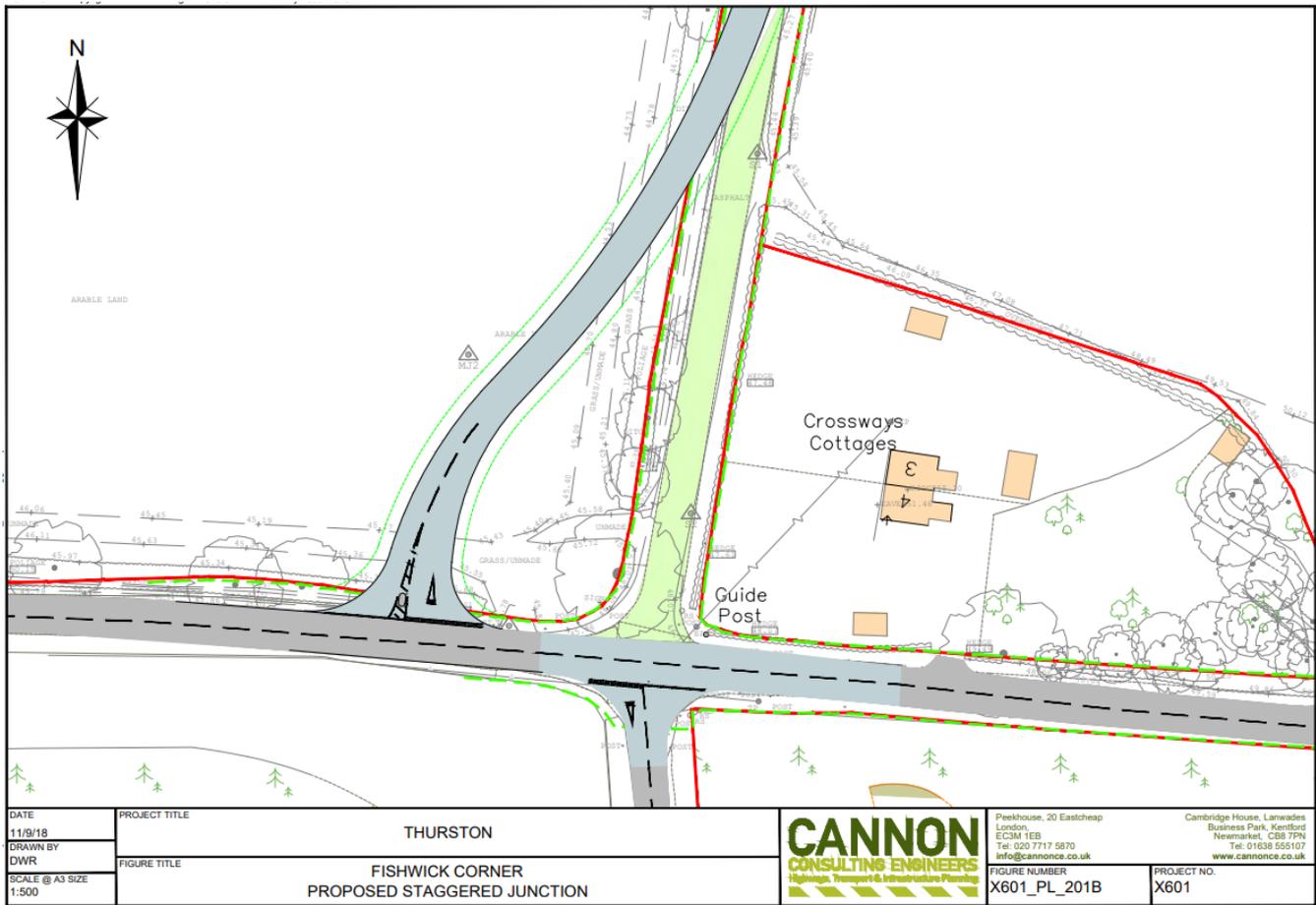
Barton Road Rail Bridge: Straightening of the road will improve sight lines for drivers and provide a 1.5m wide footway on the east side. While the width of footway is less than desirable, particularly next to a busy road we have considered that on balance we would not consider it so unsafe as to recommend refusal.

However, this is a judgement made on the likely number of pedestrians from this development and any additional pedestrian use, particularly if it involves vulnerable users, would need to be reassessed. The problem of higher vehicles having to use the middle of the road to avoid the low arch remains a hazard

as does the limited capacity albeit with a degree of improvement to the flow by the proposed mini roundabout south of the bridge. Balancing the improvements in footway, better sight lines and alignment against the remaining limited capacity we consider that on balance This is regarded as a benefit in highway terms sufficient for this development.

Proposals have been suggested by Network Rail and others to provide an underpass to provide a safer link to access either side of the railway line. While promoted as a measure to allow closure of the 'barrow' crossing between the station platforms this would also be of significant benefit to this development by providing a more desirable route remote from vehicles particularly for cyclists. This would be of significant benefit to non-motorised users and would support such a scheme. This proposal is at an early stage and it would be disproportionate to expect a single development to fund it all. However, we consider a contribution towards developing this scheme is reasonable based on the impact of the additional rail users coming from this development on the safety of the station crossing.

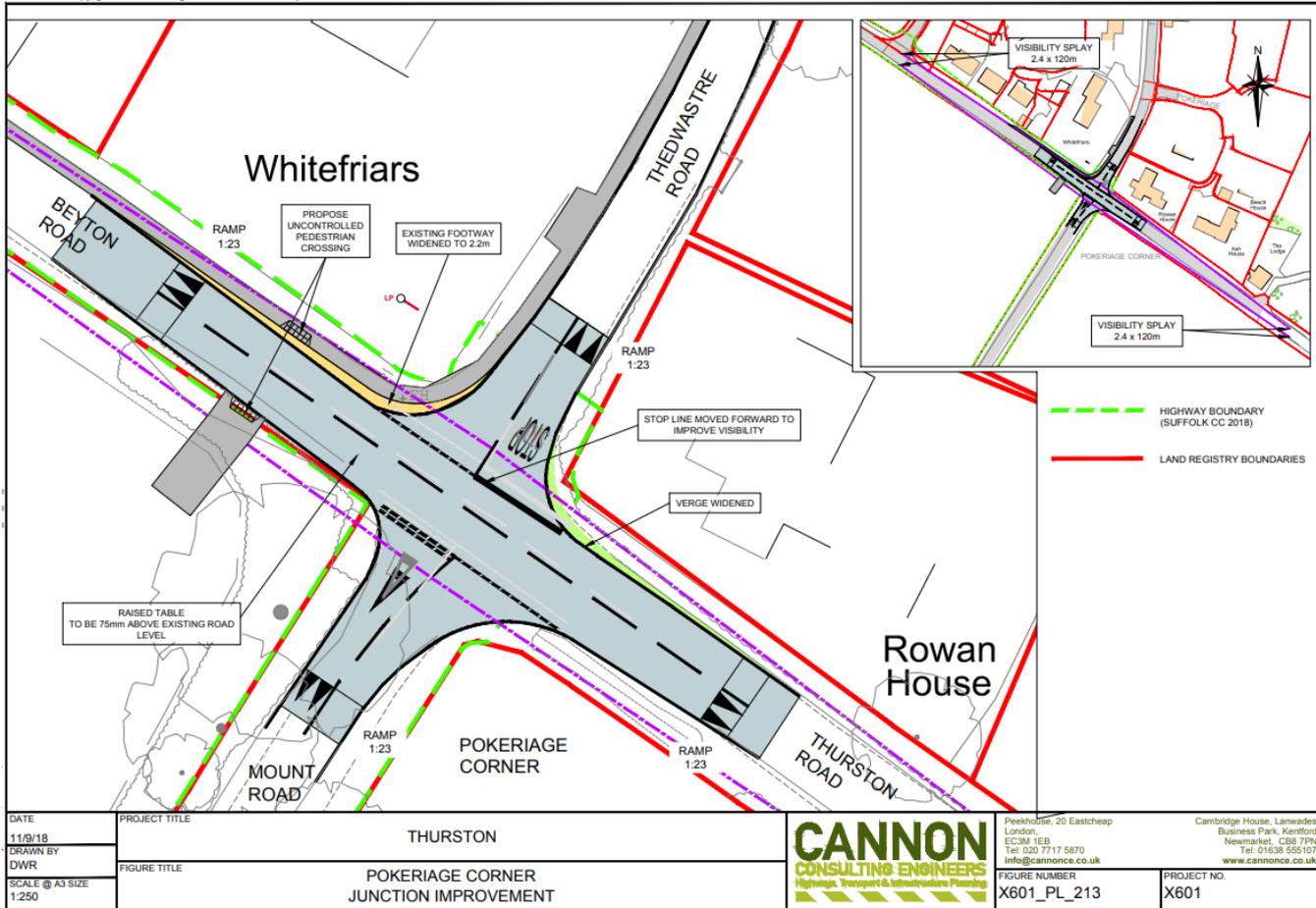
C693 Thurston Road/C692 Thurston Road junction (Fishwicks Corner)



Existing situation	Proposed mitigation
<p>At Fishwicks Corner the primary cause for congestion is due to limited visibility at the junction. Being a crossroads with four-way movements also reduces capacity and adds to delays. The junction is an accident cluster site with 13 recorded injury accidents; 11 of which were drivers failing to look properly on the minor arms of the crossroads due to poor forward visibility. As part of the mitigation for the 2017 developments, a 40mph speed limit is being introduced with a change in the junction priority and altering the give-way scenario to Stop lines on the side roads. The predicted RFC with the 2017 developments following the revised layout of the junction was calculated as 0.93 in the PM peak.</p>	<p>The land to the north west of the junction is within the developers control so the highway boundary is no longer a constraint for further highway improvements to improve safety and capacity of the junction. The dominant turning movement in the AM peak is from Thurston Road (north arm) turning right to Bury St. Edmunds and in the PM peak, from Bury St Edmunds turning left into Thurston Road (north arm). By introducing a staggered junction, this improves the RFC for Base + Committed Development + the Development from 1.10 t(unmodified) o 0.58 and reducing delays by approx. 3 minutes therefore, improving capacity. Also, staggered junctions will provide the required visibility for the speed of road (40mph) and this type of layout has been shown to reduce accidents by some 60% compared to a crossroads. Recently, a preservation order has been applied to trees next to the existing junction but these are unaffected by the proposed new junction</p>

The question of a roundabout in this location has been raised by councillors. While an acceptable solution it is not concerned proportionate to the scale of the development as the proposal for a staggered junction delivers sufficient mitigation. Also, a roundabout would require a large area of land, are less safe for cyclists than to any other kind of road layout and there would be a need to remove more trees. possibly those recently protected. SCC have also requested additional area of land to be secured to allow for a future cycle/footway scheme if that is considered necessary.

C560 Beyton Road/C692 Thurston Road/U4920 Thedwastre Road Crossroads (Pokeridge Corner)



<p>Existing situation</p> <p>Pokeridge Corner is also a crossroads where the primary cause of congestion is the lack of visibility from the side arms of the junction. It was considered the traffic impacts of the 2017 applications did not affect this junction to a point where mitigation was required. There were 3 accidents at this junction where drivers failed to look properly and overshoot the give way lines.</p>	<p>Proposed mitigation</p> <p>With the committed and proposed development, the results indicate the predicted maximum RFC in the AM peak period operates above the desirable capacity limits; RFC 0.93 and Q length of 8 vehicles on the Thedwastre Road arm. This in isolation is not considered severe and the Beyton Road development would have minimal impact in terms of capacity at this junction. However, the nature of the crashes at this junction show that altering the layout to improved visibility and installing raised junction to reduce vehicle speeds will improve safety. There are also capacity benefits improving the RFC to 0.65 and reducing the queue to 2 vehicles.</p>
<p>Existing situation</p> <p>The bridge over the rail track on Thedwastre Road has a vehicle priority system with a single lane road and a painted footway. The parish council has raised concerns on the pedestrian safety at the bridge due to the increase in traffic and pedestrian movements associated with this development. There has been no recorded crashes resulting in injury at this location and the visibility is good for all road users.</p>	<p>Proposed mitigation</p> <p>Both the developer and the LHA recognise that further improvements can be made for pedestrians. Inclusion as an obligation within the S106 agreement will enable options to be considered in consultation with the LPA and Parish Council</p>

While the LHA's preference would have been to split the Pokeridge Corner junction into two three arm priority junctions as at Fishwick Corner this is difficult at this location due to the restricted land available. While other forms of improvement would provide greater benefits that proposed mitigates the developments impact on this junction. It also enables some improvements to highway drainage and crossing points for pedestrians.

Accesses for the Site

The Suffolk Design Guide states that there should be 2 access points for developments with over 150 dwellings. The proposal gives 2 access points with required visibility; one to the south and one to the north allowing alternative routes for vehicles and reducing the impact on junctions.

4. Sustainable access to and from the Development

To promote, encourage and support the principles of sustainable transport as outlined in the National Planning Policy Framework, safe and suitable access is required for bus services, pedestrians and cyclists to and from the site:

- The rail station is within the village and is approx 500m from the centre of the site
- The closest bus stop is 500m from the centre of the site with good bus service
- The primary school is 1200m (15 minute walk) and the secondary school is 850m from the site both schools are within walking distance.
- With the proposal to improve the footway under the rail bridge, an acceptable pedestrian link is created to facilities in the village including the schools.
- A number of pedestrian crossing points are to be created along Beyton Road
- Details of improvements on Threwastre Road to be finalised as a S106 contribution
- National Rail, BMSDC and SCC and in talks regarding the existing pedestrian safety and accessibility within the station.
- Land has been safeguarded between Fishwick Corner and the rail bridge for the eventuality that a cycle route can be developed from Thurston towards Rougham as alternative to Heath Lane.

5. Discussion

When considering this application, we have been careful to balance the negative impacts of the development against the positive impacts of some of the mitigation to provide a balanced recommendation to the Planning Authority.

Capacity - The mitigation proposed for the 2017 was acceptable for that level of development at that time but did not allow headroom for future development. An additional 210 dwellings from this development will place additional strain on the road network around Thurston, specifically in the Bunbury Arms, Fishwick Corner and Pokeridge junctions and the road under the rail bridge. While we consider that this development has a significant impact in terms of capacity we do not consider that it is severe and would therefore justify a recommendation to refuse the application on highway grounds

Road Safety - in 2017 we expressed concerns regarding the impact of development in terms of road safety at the same junctions. The mitigations proposed for the 2017 applications were sufficient to mitigate their harm but not that of other future developments. This development places additional strain on the highway network in terms of road safety, in cases beyond that mitigated by the 2017 schemes. However, this application contains a number of improvements that address these road safety concerns. In particular the realignment of Fishwick Corner is a significant improvement. Improvements to the footway under the rail bridge, along Beyton Road and Pokeridge Corner are, while not the optimal solutions, beneficial in terms of road safety.

Existing Pedestrian and Cycle Links - there are two realistic links from this site to the village infrastructure. In their current form all have significant limitations,

- Barton Road: The footway under the rail bridge narrows to around 700mm and is less than that considered a safe width to allow passage of pedestrians or cyclists.
- Thedwastre Road: There is no formal footway over the rail bridge pedestrians sharing the road with vehicles within a single lane priority system
- Beyton Road: There is no current crossing point for pedestrians to cross the road to access the site.

The options of crossing the railway line at Church Road and Barrell's Road are discounted due to their distance from the site and lack of footways on the roads leading to them. The development includes improvements to footways or crossing points at all three locations. While not optimal these proposals are considered proportionate to the scale of development.

School Transport - concerns have been raised by the Parish Council and residents regarding the removal of subsidised places on school buses and the impact on travel patterns. Pupils from the proposed development could reasonably be expected to walk or cycle to both the primary and secondary schools and the applicant is expected to provide high quality footways and cycleways to enable this. However, Thurston Academy has a large, predominately rural catchment area the changes to school transport are likely to generate additional car trips from these areas for non-eligible pupils. As the policy is phased in and only started in September 2019 it is difficult at this point to assess the transport impact. It is clear that any impacts will be greatest (but not exclusively) at the Ixworth Road / Norton Road and Norton Road / Barton Road junctions. We are aware that Thurston Community College (TCC) are keen to continue to support bus travel to school and each year survey families of potential new year 7 students to see if there is enough demand to make a school-led bus option financially viable.

The Highway Authority's main concern is the impact on road safety although congestion and inconsiderate parking also have to be considered. While it is not reasonable in planning terms to expect this development to mitigate the additional school traffic it is a matter that we consider should be included in the Planning Authorities weighing up of the application.

6. Conclusion

The National Planning Performance Framework states that '*development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe*'.

As the Highways Authority we have examined this application and the supporting information in detail. The additional development will lead to more vehicles, pedestrians and cyclists using the highway network around Thurston in addition to that from the permitted developments. Without mitigation, we consider that the cumulative impacts are severe in highway terms. However, with the proposed mitigation we considered that, while some significant negative factors remain the overall impact, when balanced, the impact is no longer severe nor is there an unacceptable impact on road safety. For these reasons we advise that we do not recommend that this application is refused specifically on highway grounds.

CONDITIONS

Should the Planning Authority be minded to grant planning approval the Highway Authority in Suffolk would recommend they include the following conditions and obligations:

V 1 - Condition: Before the access into the site is first used, visibility splays shall be provided as drawing Nos X601_PL_200 and 200B 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.

HW 1 - Condition: Prior to commencement of any works (save for site clearance and technical investigations) details of the highway improvements and mitigation (including layout, levels, gradients, surfacing and means of surface water drainage), shall be submitted to and approved in writing to the Local Planning Authority in consultation with Local Highway Authority. The details as agreed shall be delivered in accordance with a timetable for improvement which shall have been submitted to and agreed in writing by the LPA concurrent with the said details.

Reason: To ensure that design highway improvements/footways are constructed to an acceptable standard.

ER 1 - Condition: Prior to commencement of any works, (save for site clearance and technical investigations) 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.

ER 2 - 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 in consultation with Local Highway Authority.

L1 - Condition: Before the development hereby permitted is commenced a Lighting design shall have been submitted to and approved in writing by the Local Planning Authority.

Reason: In the interest of highway safety to avoid the hazard caused by disability or discomfort glare for motorists.

P 2 - Condition: Before the development is commenced details of the areas to be provided for the [LOADING, UNLOADING,] manoeuvring and parking of vehicles including electric vehicle charging units and secure 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 enable vehicles to enter and exit the public highway in forward gear in the interests of highway safety.

B 2 - 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.

TP1 - Condition: Prior to the occupation of any dwelling details of the travel arrangements to and from the site for residents of the dwellings, in the form of a Travel Plan in accordance with the mitigation measures identified in the submitted Transport Assessment shall be submitted for the approval in writing by the local planning authority in consultation with the highway authority. No dwelling within the site shall be occupied until the Travel Plan has been agreed. The approved Travel Plan measures shall be implemented in accordance with a timetable that shall be included in the Travel Plan and shall thereafter adhered to in accordance with the approved Travel Plan.

Reason: In the interest of sustainable development as set out in the NPPF, policies CS7 and CS8 of the St Edmundsbury Core Strategy and Strategic Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

TP2 - 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 Pack (RTP). Not less than 3 months prior to the first occupation of any dwelling, the contents of the RTP 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, personalised Travel Planning and a multi-modal travel voucher.

Reason: In the interest of sustainable development as set out in the NPPF, and Strategic Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

HGV CONSTRUCTION - 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:

- haul routes for construction traffic on the highway network and monitoring and review mechanisms.
- provision of boundary hoarding and lighting
- details of proposed means of dust suppression
- details of measures to prevent mud from vehicles leaving the site during construction
- details of deliveries times to the site during construction phase
- details of provision to ensure pedestrian and cycle safety
- programme of works (including measures for traffic management and operating hours)
- parking and turning for vehicles of site personnel, operatives and visitors
- loading and unloading of plant and materials
- storage of plant and materials
- maintain a register of complaints and record of actions taken to deal with such complaints at the site office as specified in the Plan throughout the period of occupation of the site.

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.

S106 CONTRIBUTION

Travel Plan

As Suffolk County Council (as Highway Authority) have been identified as a key stakeholder in the Travel Plan process, a £1,000 per annum Travel Plan Evaluation and Support Contribution payable prior to occupation of the 100th dwelling to provide Suffolk County Council suitable resource to engage with the Travel Plan Coordinator appointed by the applicant. As this is a discretionary function of the County Council, this is chargeable under Section 93 of the 2003 Local Government Act and Section 3 of the 2011 Localism Act. This will need to be secured through a Section 106 Agreement or separate Unilateral Undertaking. If the contribution is not secured Suffolk County Council are unlikely to have the resource to provide the assistance which is identified in the Travel Plan, which is likely to result in the Travel Plan failing. Further guidance and justification of this contribution can be found in the Suffolk County Council Travel Plan Guidance (www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/26444-Suffolk-Travel-Plan-Guidance-V5-Printable-Version-LR.pdf).

Alternatively, Suffolk County Council can produce the Resident Travel Packs and deliver the Travel Plan on behalf of the developer if a suitable contribution can be agreed and secured through a Section 106 Agreement or separate Unilateral Undertaking prior to the determination of this application. If this is of interest to the developer, they can contact the Suffolk County Council Travel Plan Team at travelplans@suffolk.gov.uk to obtain a quote. Further information on this service can be found on www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Travel-Plan-Delivery-offer-to-LPAs-and-developers-2.pdf.

Public Transport

Creation of pair of raised bus stops at the southern end of New Road, with a pedestrian access into the site at that point. These works can be completed under s278 or a contribution of £6,000 for the construction.

NOTES

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.

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.

Travel Plan Comments

On reviewing the Framework Travel Plan (dated July 2019) the Travel Planning Officer raised a number of points; regarding provision of bus stops and multi-modal voucher and a need to liaise with other Travel Plans for Thurston Applications. Also, details were highlighted on what is required in the Travel Plan. These are to be addressed with the officer.

Yours sincerely,

Samantha Harvey
Senior Development Management Engineer
Growth, Highways and Infrastructure

Dear Vincent,

Thank you for consulting me on the proposed residential development at Land South West of Beyton Road in Thurston. I will be submitting some comments on the submitted Travel Plan and the proposed sustainable transport measures, however this will form part of the formal Suffolk County Council Highways response that Sam Harvey is leading on to comply with internal protocol.

Kind regards

Chris Ward

Travel Plan Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council

From: RM Floods Planning <floods.planning@suffolk.gov.uk>
Sent: 05 August 2019 13:49
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Cc: Vincent Pearce <Vincent.Pearce@baberghmidsuffolk.gov.uk>
Subject: 2019-08-05 JS Reply Land South West Of, Beyton Road, Thurston, Ref DC/19/03486

Dear Vincent Pearce,

Subject: Land South West Of, Beyton Road, Thurston, Ref DC/19/03486

Suffolk County Council, Flood and Water Management have reviewed application ref DC/19/03486.

We have reviewed the following submitted documents and we recommend **approval of this application subject to conditions:**

- Illustrative Masterplan ref 19.2012/SL-101 Rev E
 - Location Plan ref 19-2012-O-01 rev D
 - Flood Risk Assessment and Drainage Strategy Ref 1707-020 June 2019
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 a Construction Surface Water Management Plan (CSWMP) detailing how surface water and storm water will be managed on the site during construction (including demolition and site clearance operations) is submitted to and agreed in writing by the local planning authority. The CSWMP shall be implemented and thereafter managed and maintained in accordance with the approved plan for the duration of construction. The approved CSWMP and shall include:
 - i. Method statements, scaled and dimensioned plans and drawings detailing surface water management proposals to include :-
 1. Temporary drainage systems

2. Measures for managing pollution / water quality and protecting controlled waters and watercourses
 3. Measures for managing any on or offsite flood risk associated with construction
- h. Details of the maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority.

The scheme shall be fully implemented as approved.

Reasons: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development. To ensure the development does not cause increased flood risk, or pollution of watercourses or groundwater. To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/guidance-on-development-and-flood-risk/construction-surface-water-management-plan/>

2. Within 28 days of completion of the final dwelling details of all Sustainable Urban Drainage System components and piped networks shall be 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 that the Sustainable Drainage System has been implemented as permitted and that all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register as per s21 of the Flood and Water Management Act 2010 in order to enable the proper management of flood risk with the county of Suffolk

<https://www.suffolk.gov.uk/roads-and-transport/flooding-and-drainage/flood-risk-asset-register/>

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 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a section 50 license under the New Roads and Street Works Act 1991
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton
Flood & Water Engineer
Flood & Water Management
Growth, Highways & Infrastructure

Suffolk County Council | Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX

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
Endeavour House
8 Russell Road
Ipswich
Suffolk IP1 2BX

Enquiries to: James Rolfe
Direct Line: 01284 741225
Email: James.Rolfe@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2019_03486
Date: 2nd August 2019

For the Attention of Vincent Pearce

Dear Mr Isbell

**Planning Application DC/19/03486 Land South West Of Beyton Road Thurston:
Archaeology**

This is a large site 7.8ha that has not been subject to archaeological investigation, in an area of archaeological potential recorded on the County Historic Environment Record, in close proximity to a Roman Road (RGH 017) and in a general landscape of later prehistoric activity. As a result, there is high 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.

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 199), 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 Condition 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 (2018).

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 mitigation. 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,

James Rolfe

Senior Archaeological Officer
Conservation Team

Mid Suffolk District Council
Planning Department
Endeavour House
Russell Road
Ipswich
IP1 2BX

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref:
Our Ref: FS/F305800
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 06/08/2019

Dear Sirs

Land south west of Beyton Road, Thurston IP30 9LT
Planning Application No: DC/19/03486
Hydrants are required for this development
(see our required conditions)

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.

Sprinklers Advised

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

Water Officer

Suffolk Fire and Rescue Service

Enc: Hydrant requirement letter

Copy: sam.hollingworth@struttandparker.com

Enc: Sprinkler information

Mid Suffolk District Council
Planning Department
Endeavour House
Russell Road
Ipswich
IP1 2BX

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref:
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: 6 August 2019

Planning Ref: DC/19/03486

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land south west of Beyton road, Thurston IP30 9LT
DESCRIPTION: 210 dwellings
HYDRANTS REQUIRED

If the Planning Authority is minded to grant approval, the Fire Authority require 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, or consulted and the conditions not applied, the Fire Authority will require that fire hydrants be installed retrospectively by the developer if the Planning Authority has not submitted a reason for the non-implementation of the required condition in the first instance.

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

Water Officer

Suffolk Fire and Rescue Service

OFFICIAL

Your ref: DC/19/1519/OUT
Our ref: Rougham – land adjacent to Fishwick
Corner, Thurston Road 56938
Date: 06 November 2019
Enquiries: Neil McManus
Tel: 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

Julie Barrow,
Planning and Regulatory Services,
West Suffolk Council,
West Suffolk House,
Western Way,
Bury St Edmunds,
Suffolk,
IP33 3YU

Dear Julie,

Rougham: land adjacent to Fishwick Corner, Thurston Road – developer contributions

I refer to the proposal: outline planning application (means of access) – (i) proposed improvement to Fishwick Corner in West Suffolk Council and (ii) 210no. dwellings means of access, open space and associated infrastructure, including junction improvements with all proposed development located within Mid Suffolk District Council.

Reason(s) for re-consultation: amended plans and additional documents received 04 November 2019.

I previously submitted a consultation response by way of letter dated 06 August 2019. I have no further comments to make.

I have copied this letter to Steve Merry of Suffolk County Council and Vincent Pearce of BMSDC.

Yours sincerely,

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

cc Steve Merry, Suffolk County Council (highways)
Vincent Pearce, BMSDC

Your ref: DC/19/03486
 Our ref: Thurston – land south-west of Beyton
 Road 00056938
 Date: 30 July 2019
 Enquiries: Neil McManus
 Tel: 07973 640625
 Email: neil.mcmanus@suffolk.gov.uk

Mr Vincent Pearce,
 Growth & Sustainable Planning,
 Babergh and Mid Suffolk District Councils,
 Endeavour House,
 8 Russell Road,
 Ipswich,
 Suffolk,
 IP1 2BX

Dear Vincent,

Thurston: land south-west of Beyton Road – developer contributions

I refer to the proposal: outline planning application (some matters reserved – access to be considered) – erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).

Summary of infrastructure requirements split between CIL/S106:

CIL	Education	
	- Secondary school expansion	£841,306
	- sixth form expansion	£181,904
CIL	Libraries improvement	£45,360
CIL	Waste infrastructure	£23,100
S106	Education	
	- new primary school land cost	£67,288
	- new primary school build cost	£1,019,772
S106	New early years build cost	£372,609
S106	Highways	tbc

Ideally, the County Council would like to see a plan-led approach to housing growth in the locality, which would also identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including highway impacts and school provision.

Whilst some infrastructure requirements will be covered under Mid Suffolk District Council's Regulation 123 list of the CIL charging schedule it is nonetheless the Government's intention that all development must be sustainable as set out in the National Planning Policy Framework (NPPF). On this basis, the County Council sets out below the infrastructure implications with costs, if planning permission is granted and implemented.

The National Planning Policy Framework (NPPF) paragraph 56 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 development in Mid Suffolk.

The emerging Joint Local Plan contains policy proposals that will form an important tool for the day to day determination of planning application in both districts. Infrastructure is one of the key planning issues and the Infrastructure chapter states that the Councils fully appreciate that the delivery of new homes and jobs needs to be supported by necessary infrastructure, and new development must provide for the educational needs of new residents.

Community Infrastructure Levy

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

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

- Provision of passenger transport
- Provision of library facilities
- Provision of additional pre-school places at *existing* establishments
- Provision of primary school places at *existing* schools

- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

However, new CIL Regulations were laid before Parliament on 4 June 2019. These Regulations (Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019) will come into force on 1 September 2019 (“the commencement date”). Regulation 11 removes regulation 123 (pooling restriction and the CIL 123 List in respect of ‘relevant infrastructure’).

The details of the impact on local infrastructure serving the development is set out below and, apart from the proportionate contributions towards the land and build costs of a new early years setting and a new primary school, will form the basis of a future CIL bid for funding:

- 1. Education.** The revised NPPF says in paragraph 94, ‘It is important 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. They should:
 - a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
 - b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.’

Furthermore, the NPPF at paragraph 104 states: ‘Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;’

The Department for Education (DfE) publication ‘Securing developer contributions for education’ (April 2019), which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations [revised March 2019]. Paragraph 19 of the DfE guidance states, “We advise local authorities with education responsibilities to work jointly with relevant local planning authorities as plans are prepared and planning applications determined, to ensure that all education needs are properly addressed, including both temporary and permanent education needs where relevant, such as school transport costs and temporary school provision before a permanent new school opens within a development site”.

In paragraph 15 of the DfE guidance ‘Securing developer contributions for education’ it says, “We advise that you base the assumed cost of mainstream school places on national average costs published annually in the DfE school place scorecards. This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the national average to reflect the costs in your region, using BCIS location factors”.

The most recent scorecard is 2018 and the national average new build cost per pupil for primary schools is £19,611. The most recent (March 2019) BCIS location factor for the East of England, which includes Suffolk, is 100. When applied to the national new build cost (£19,611 x 1.00) produces a total of £19,611 per pupil for new build primary schools.

The most recent scorecard is 2018 and the national average expansion build cost per pupil for secondary schools is £22,738. The most recent (March 2019) BCIS location factor for the East of England, which includes Suffolk, is 100. When applied to the national expansion build cost (£22,738 x 1.00) produces a total of £22,738 per pupil for new build secondary schools. The DfE guidance in paragraph 16 says, “further education places provided within secondary school sixth forms will cost broadly the same as a secondary school place”.

SCC anticipates the following **minimum** pupil yields from a development of 210 dwellings, namely:

- a) Primary school age range, 5-11: 52 pupils. Cost per place is £19,611 (2019/20 costs).
- b) Secondary school age range, 11-16: 37 pupils. Cost per place is £22,738 (2019/20 costs).
- c) Secondary school age range, 16+: 8 pupils. Costs per place is £22,738 (2019/20 costs).

The local catchment schools are Thurston Church of England Primary Academy, Ixworth Free School, and Thurston Community College.

The primary school strategy is to deliver a new primary school on land to the north of Norton Road in Thurston.

The County Council will require proportionate developer contributions for land and build costs for a new primary school from this proposed development, which will need to be secured by way of a planning obligation. On this basis, SCC will require a capital contribution of 52 places x £19,611 per place = £1,019,772 (2019/20 costs) to spend on primary school provision.

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 52 places x £1,294 per place = £67,288.

Based on existing secondary school forecasts, SCC will have no surplus places available at the local secondary and sixth form schools. On this basis, at the secondary school level a future CIL funding bid of at least £841,306 (2019/20 costs) will be made and at the sixth form level a future CIL funding bid of at least £181,904 (2019/20 costs) will be made.

If the District Council considers that planning permission should be granted for up to 210 dwellings, this must be on the basis that s106 developer funding is secured by way of a planning obligation for the proportionate land and build costs of the new primary school. Contributions required are as follows:

a) **Primary School Build Contribution** – £1,019,772, increased by the BCIS.

b) **Primary School Land Contribution** – £67,288, increased by the RPI.

2. Pre-school provision. Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'

The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

The recently published guidance from the Department for Education on Delivering schools to support housing growth states in paragraph 16: "Developer contributions for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school".

From these development proposals SCC would anticipate up to 33 pre-school children arising, which is equivalent to 19 FTE places (one FTE place is 30 hours per week) at a cost per place of £19,611 (2019/20 costs). Contribution required is 19 places x £19,611 per place = £372,609 (2019/20 costs).

If the District Council considers that planning permission should be granted for up to 210 dwellings, this must be on the basis that s106 developer funding is secured by way of a planning obligation for the proportionate build costs of the new setting. Contribution required is as follows:

a) **Pre-School Build Contribution** – £372,609, increased by the BCIS.

3. Play space provision. This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A

key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.

4. Transport issues. Refer to the NPPF 'Section 9 Promoting sustainable transport'.

A comprehensive assessment of highways and transport issues will be required as part of the planning application. This will include travel plan, pedestrian & cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Sam Harvey will coordinate this.

This proposed development provides the opportunity to realign the junctions at Fishwick Corner and Pokeridge Corner to improve highway safety. This will require land to be dedicated for highway purposes. In addition, a cumulative highways impact assessment will be required on the basis of schemes already granted planning permission in Thurston and the wider locality. Consideration must be given to addressing pedestrian safety issues at Thurston Railway Station.

A planning obligation or planning conditions will cover site specific matters.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014 [updated 2015].

5. Libraries. Refer to the NPPF Section 8: 'Promoting healthy and safe communities'.

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A CIL contribution of £216 per dwelling is sought i.e. £45,360, which will be spent on enhancing provision at the nearest library. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of $(30 \times £3,000) = £90,000$ per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

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.

Energy from Waste and Materials Recycling Facilities – there is sufficient capacity available to service this proposed development.

Household Waste and Recycling Centre – the current site serving the proposed development is in Bury St Edmunds. This site is already inadequate to provide an adequate service for the West Suffolk area, particularly in view of the major development in and around Bury St Edmunds. To improve the HWRC service a project is underway to develop a major new West Suffolk Waste Hub just outside Bury St Edmunds. The construction of this new HWRC has commenced but should future proof the provision of waste and recycling services in this area.

Another 210 new dwellings within the catchment area of the Bury St Edmunds HWRC is a significant increase in potential users of this facility and SCC would expect a contribution towards the new West Suffolk Hub which required considerable capital funding. Contributions of £110 per household from any significant development in this area would be requested – in this case a CIL contribution in the region of £23,100 would be applicable.

- 7. Supported Housing.** Section 5 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, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

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 LPAs housing team to identify local housing needs.

- 8. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Suffolk County Council is the lead local flood authority. Paragraphs 155 – 165 refer to planning and flood risk and paragraph 165 states: 'Major developments should incorporate sustainable

drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
- d) where possible, provide multifunctional benefits.'

In accordance with the NPPF, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate.

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

- 9. Ecology, landscape & heritage.** These are matters for the Council to consider and address. In terms of good design, it is suggested that consideration should be given to incorporating suitable roosting and nesting boxes within dwellings for birds and bats, as well as providing suitable biodiversity features including plants to attract & support insects, reptiles, birds & mammals. Refer to the MHCLG guidance on the Natural environment [updated 21 July 2019].
- 10. Health impact assessment.** An assessment of the likely impact of the development proposals on local health infrastructure, facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with NHS England.
- 11. Fire Service.** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for firefighting which will allow SCC to make final consultations at the planning stage.
- 12. Superfast broadband.** This should be considered as part of the requirements of the NPPF Section 10 'Supporting high quality communication'. SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as improving property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange-based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the

development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

13. 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.

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

Apart from the site-specific proportionate developer contributions for the new early years setting and new primary school, the above will form the basis of a future bid to Mid Suffolk District Council for CIL funds if planning permission is granted and implemented.

Yours sincerely,

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

cc Carol Barber, Suffolk County Council
Sam Harvey/Steve Merry/Luke Barber, Suffolk County Council
Floods Planning, Suffolk County Council

Consultee Comments for Planning Application DC/19/03486

Application Summary

Application Number: DC/19/03486

Address: Land South West Of Beyton Road Thurston Suffolk

Proposal: Outline Planning Application (some matters reserved - access to be considered) -
Erection of up to 210 dwellings, means of access, open space and associated infrastructure,
including junction improvements (with all proposed development located within Mid Suffolk District,
with the exception of proposed improvements to Fishwick Corner being within West Suffolk).

Case Officer: Vincent Pearce

Consultee Details

Name: Mr Tony Bass

Address: Endeavour House, Ipswich IP1 2BX

Email: tony.bass@baberghmidsuffolk.gov.uk

On Behalf Of: Communities (Major Development)

Comments

The Design and Access Statement does not appear to reference any significant community facilities as part of the application although it does give some indicative open space provision, which requires more detail to be able to considered.

The Parish Council have referenced their open space, sport and community provision priorities within their neighbourhood plan, which should be considered as part of this application.

There is also current consideration as to the potential for more sporting provision at Thurston Community College and its 6th form site in Beyton. These are key sites that warrant financial contributions to support their community and wider community reach.

MID SUFFOLK DISTRICT COUNCIL

To: Vincent Pearce - Planning Officer

From: Louise Barker – Housing Enabling Officer – Strategic Housing

Date: 13th August 2019

Subject: Outline Planning Permission - DC/19/03486

Proposal: Outline Planning Application (some matters reserved - access to be considered) -Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).

Location: Land South West of, Beyton Road, Thurston, Suffolk

Key Points

1. Background Information

<ul style="list-style-type: none">• This is an outline application for the erection of up to 210 dwellings
<ul style="list-style-type: none">• Based on 210 dwellings, this development triggers an affordable housing contribution under current local policy of 35% of total dwellings = 73 affordable dwellings.• This response is given with regards to National and Local Policy including the Thurston Neighbourhood Plan.• Reference is made within the documents accompanying this planning application to the Neighbourhood Plan. If delivered this scheme should have regard to the Neighbourhood Plan when determining the final housing mix.

2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2017, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The 2017 SHMA indicates that in Mid Suffolk there is a need for **94 new affordable homes per annum. Ref1**

2.3 Furthermore, by bedroom numbers the affordable housing mix should equate to:

Ref2 Estimated proportionate demand for affordable new housing stock by bedroom number	
Bed Nos	% of total new affordable stock
1	46%
2	36%
3	16%
4+	2%

2.4 This compares to the estimated proportionate demand for new housing stock by bedroom size across all tenures.

Ref3 Estimated proportionate demand for all tenure new housing stock by bedroom number	
Bed Nos	% of total new stock
1	18%
2	29%
3	46%
4+	6%

2.5 The Council's 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 the key drivers for this increased demand for smaller homes.

2.6 The Council's Choice Based Lettings system currently has circa. **689** applicants registered for affordable housing in Mid Suffolk at July 19.

2.7 The Council's Choice Based Lettings system currently has 11 applicants registered stating a local connection to Thurston at July 2019. This site is a S106 planning obligation site so the affordable housing provided will be to meet district wide need hence the **689** applicants registered is the important number.

3. Preferred Mix for Open Market homes.

3.1 There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and want to remain in their local communities.

3.2 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.

3.3 Furthermore, the **2014 Suffolk Housing Survey** shows that, across Mid Suffolk district:

- 12% of all existing households contain someone looking for their own property over the next 3 years (mainly single adults without children). The types of properties they are interested in are flats / apartments, and smaller terraced or semi-detached houses.
- Although this is not their first preference, many accept that the private rented sector is their most realistic option.
- 25% of households think their current property will not be suitable for their needs in 10 years' time.
- 2 & 3 bed properties are most sought after by existing households wishing to move.
- Suitable housing options for more elderly people are less available within the current housing stock. 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years.

3.4 Furthermore the draft Thurston Neighbourhood Plan Policy 2 - Meeting Thurston's Housing Need states: all housing proposals of five or more units must reflect the need across all tenures for smaller units specifically designed to address the need of older people (for downsizing) and younger people (first time buyers).

3.5 The planning application accompanying documents has reference to the Neighbourhood Plan. The planning statement accompanying the application at para 5.73 states: The specific housing mix would be a matter for a more detailed application to follow. However, we can confirm the intention to provide a range of house types including bungalows, dwellings built to high accessibility standards, a variety of house sizes, and affordable housing (including both affordable rent as defined by the NPPF, and shared ownership).

3.6 We support a broad housing mix to include bungalows and homes for first time buyers and older people.

4. Preferred mix for Affordable Housing

4.1 The most recent information from the Mid Suffolk's Council's Housing Register shows 11 applicants registered who have a local connection to Thurston and the district housing register currently holds 689 applicants.

4.2 This site is a S106 planning obligation site so the affordable housing will be allocated on a district wide basis.

4.3 The housing register shows a district wide housing need with a majority of 1 and 2 bedroom homes followed by 3 beds with a much smaller need for 4+ bedrooms.

4.4 Current local plan policy looks to deliver an approximate 25% shared ownership and 75 % affordable rented unit split in the first instance, to meet housing need and affordability.

4.5 We recommend a majority of 1 and 2 bedroom affordable dwellings (including bungalows) with a smaller element of 3+. The following mix is recommended:

Affordable rented dwellings = 54

8 x 1b 2p flats @ 50sqm minimum
6 x 1b 2p bungalows @ 50sqm minimum
8 x 2b 4p bungalows @ 70sqm minimum
22 x 2b 4p houses @ 79sqm minimum
9 x 3b 6p houses @ 102sqm minimum
1 x 4b 8p houses @ 124sqm minimum

Shared Ownership dwellings = 19

13 x 2b 4p house @ 79sqm
6 x 3b 5p house @ 93sqm

5. Other requirements for affordable homes:

- Properties must be built to the Housing Standards Technical guidance March 2015.
- S106 affordable dwellings should be delivered grant free.
- The council is granted 100% nomination rights to all the affordable units on first lets and minimum of 75% of relets in perpetuity.
- For all shared ownership dwellings applicants must be registered with the Suffolk Homebuy agency.
- Initial share purchases for shared ownership dwellings to be capped at 70%.
- The affordable units to be constructed 'tenure blind' and must not be in clusters of more than 15 dwellings. The affordable homes should be distributed across the different phases of the development.
- All flats must be in separate blocks and capable of freehold transfer to an RP. The flatted blocks must provide bicycle storage and bin store areas.

- Adequate parking provision is made for the affordable housing units and cycle storage/sheds.

From: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>
Sent: 31 July 2019 13:12
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: RE: MSDC Planning Consultation Request - DC/19/03486

Hello Planning Support

The Public Realm team note the provision of indicative open space within the proposed development, though at this stage no detail has been provided.

It would be expected that with a development of this size, that suitable play provision is included within the public open spaces. The Team would welcome the provision of public open spaces that reflect the rural nature on three sides of this site. We would welcome the inclusion of wildflower meadows and enhancements to benefit local wildlife in the more detailed landscape designs that will follow.

Regards

Dave Hughes
Public Realm Officer

From: Peter Chisnall <Peter.Chisnall@baberghmidsuffolk.gov.uk>
Sent: 31 July 2019 12:40
To: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: DC/19/03486

Dear Vincent,

Proposal: Outline Planning Application (some matters reserved - access to be considered)

-

Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).

Location: Land South West Of, Beyton Road, Thurston, Suffolk

Many thanks for your request for comments in relation to the above application.

We have no objection to this application subject to the comments below.

We are very pleased to see the applicant committing to an energy and carbon reduction beyond Part L. The Energy Strategy Statement does refer to Mid Suffolk District Core Strategy , Policy CS3 - Reduce Contributions to Climate Change and there is consideration of various forms of low carbon techniques and renewable energy measures.

However we cannot find reference to electric vehicle charging, as per Suffolk CC parking guidance all residential property must have access to charging facilities, we suggest that all plots have the appropriate wiring, trunking, fuses etc installed during construction to allow the connection of a charge point in the future.

Regards,

Peter

Peter Chisnall, CEnv, MIEMA, CEnvH, MCIEH
Environmental Management Officer
Babergh and Mid Suffolk District Council - Working Together
Tel: 01449 724611
Email: peter.chisnall@baberghmidsuffolk.gov.uk
www.babergh.gov.uk www.midsuffolk.gov.uk

DC/19/03486 | Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk). | Land South West Of Beyton Road Thurston Suffolk

Thank you for consulting me on this application.

I have the following comments to make:

1. The reserved matters application(s) relating to design and layout of residential dwellings shall include a detailed acoustic assessment and Acoustic Design Statement (that includes evaluation and selection of mitigation methods, PROPG), produced by a competent person, which provides details of the noise exposure at the facade of residential dwellings, internal noise levels in habitable rooms and noise levels in all associated amenity spaces. The design and layout should avoid exposure of habitable rooms to noise levels that exceed the following criteria:
 - 60dBLAeq 16 hours (daytime, 07:00-23:00, outside)
 - 55dBLAeq 8 hours (night, 23:00-07:00, outside)

As required to meet the above, acoustic barriers and site design, including building orientation and internal layout of dwellings, shall be used to minimise noise exposure to habitable rooms and reduce the need to rely on closed windows.

Where the facade noise levels outside of habitable rooms do not exceed those stated above, but the internal noise levels stated in the current version of BS8233 are exceeded with windows open, enhanced passive ventilation with appropriate sound insulating properties shall be provided to ensure compliance with the current version of BS8233 with windows closed and that maximum internal noise levels at night do not exceed 45dBA on more than 10 occasions a night.

If exposure exceeds the noise levels stated above, significantly enhanced ventilation will be required, and will need to be proposed, with any reliance upon building envelope insulation with closed windows to be justified in supporting documents that cross reference the mitigation measures used and the evaluation of different designs, layouts and sound reduction methods (including barriers) considered during the design process.

In addition, noise levels in external amenity spaces shall not exceed 55dBLAeq 16 hours, daytime. The development shall thereafter be carried out in accordance with any details approved, and shall be retained in accordance with these details thereafter.

2. Finally as the site is in proximity to existing dwellings, it is essential that a Construction Management Plan be in place to minimise loss of amenity arising from construction of the development as follows:.

- No development shall commence until a Construction and Environmental Management Plan (CEMP), to cover both the site clearance and construction phases of the

development, has been submitted to and approved in writing by the Local Planning Authority.

The CEMP shall be undertaken in accordance with best practice guidelines and BS: 5228:2009 + A1:2014 (and any revisions thereof). The plan shall include details of :

operating hours, (recommended and acceptable are 0800-1800 Mon-Fri, 0900-1300 Sat with no working on Sundays or bank holidays) scheduled timing/phasing of development for the overall construction period, means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors), loading and unloading of plant and materials, location and management of wheel washing facilities, external lighting, location and nature of compounds and storage areas (including maximum storage heights), waste removal, location and nature of temporary buildings and boundary treatments, dust management, noise management (both in terms of workers and local residents, and to include noise limit at the nearest sensitive residential property, or agreed representative accessible monitoring point) and waste/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 be submitted in phases for each phase of construction so as to take account of protection measures for both newly constructed (and occupier) dwellings as well as those dwellings which existed prior to commencement/

3. No burning shall take place on site during the site clearance/demolition or construction phases of the development.

Andy

Andy Rutson-Edwards, MCIEH AMIOA
Senior Environmental Protection Officer

Consultation Response Pro forma

1	Application Number	DC/19/03486	
2	Date of Response	15/08/2019	
3	Responding Officer	Name:	Hannah Bridges
		Job Title:	Waste Management Officer
		Responding on behalf of...	Waste Services
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 subject to conditions	
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>Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around attached are the vehicle specifications.</p>  <p>OLYMPUS - 8x4MS Wide - Euro 6 - Smo</p> <p>The road surface and construction must be suitable for an RCV to drive on.</p> <p>The presentation points for the waste and recycling bins for each property the points must be at the edge of the curtilage and plotted on a map for approval.</p>	
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	Meet the conditions in the discussion.	

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.



19 August 2019

Vincent Pearce
Babergh District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Babergh District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/19/03486
Location: Land South West Of Beyton Road Thurston Suffolk
Proposal: Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).

Dear Vincent,

Thank you for consulting Place Services on the above application.

No objection subject to securing biodiversity mitigation and enhancement measures

Summary

We have reviewed the Preliminary Ecological Appraisal (Southern Ecological Solutions Ltd, July 2018) and the Phase 2 Ecology Survey (Southern Ecological Solutions Ltd, Southern Ecological Solutions Ltd 2019), submitted by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority species.

We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on Protected and Priority species/habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

However, we note that the two Grey Partridge were recorded during the Breeding Bird Survey. Therefore, to compensate the loss of habitat used by this Priority Species and Red list species, it is recommended that a buffer strip should be provided on offsite in nearby agricultural land to provide



nesting cover for this species. This buffer strip should be undertaken following agri-environmental scheme: SW1 '4m to 6m buffer strip on cultivated land' and should be secured for a period of 10 years.

Overall, we support the proposed reasonable biodiversity enhancements, which have been recommended to secure measurable net gains for biodiversity, as outlined under Paragraph 170d of the National Planning Policy Framework 2019. However, it is recommended that details and aftercare of the Biodiversity Enhancements measures should be included within the proposed Landscape and Ecological Management Plan.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Impacts will be minimised such that the proposal is acceptable subject to the conditions below based on BS42020:2013.

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

Recommended conditions:

1. ACTION REQUIRED IN ACCORDANCE WITH ECOLOGICAL APPRAISAL RECOMMENDATIONS

"All mitigation and enhancement measures and/or works shall be carried out in accordance with the details contained in the Phase 2 Ecology Survey (Southern Ecological Solutions Ltd, Southern Ecological Solutions Ltd 2019) 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: To conserve and enhance Protected and Priority species and allow the LPA to discharge its duties under the UK Habitats Regulations, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species).

2. PRIOR TO COMMENCEMENT: FARMLAND BIRD MITIGATION STRATEGY

"A Farmland Bird Mitigation Strategy shall be submitted to and approved by the local planning authority to compensate the loss of Grey Partridge Habitat. This shall include provision of a buffer strip, to be secured by legal agreement or a condition of any consent, in nearby agricultural land, prior to commencement.

The content of the Farmland Bird Mitigation Strategy shall include the following:

- a) Purpose and conservation objectives for the proposed Buffer Strip;*



- b) *detailed methodology following Agri-Environment Scheme option: 'SW1: 4m to 6m buffer strip on cultivated land';*
- c) *locations of the compensation by appropriate maps and/or plans;*
- d) *persons responsible for implementing the compensation measure.*

The Farmland Bird Mitigation Strategy shall be implemented in accordance with the approved details and all features shall be retained for a minimum period of 10 years."

Reason: To allow the LPA to discharge its duties under the NERC Act 2006 (Priority habitats & species)

3. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

"A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior occupation of the development.

The content of the LEMP shall include the following:

- a) *Description and evaluation of features to be managed.*
- b) *Ecological trends and constraints on site that might influence management.*
- c) *Aims and objectives of management.*
- d) *Appropriate management options for achieving aims and objectives.*
- e) *Prescriptions for management actions.*
- f) *Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).*
- g) *Details of the body or organisation responsible for implementation of the plan.*
- h) *Ongoing monitoring and remedial measures.*

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) 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."

Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

4. PRIOR TO OCCUPATION: WILDLIFE SENSITIVE LIGHTING DESIGN SCHEME

"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, Isolux drawings 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.”

Reason: To allow the LPA to discharge its duties under the UK Habitats Regulations 2017, the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)
Ecological Consultant
ecology.placeservices@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

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



14 August 2019

Matthew Blackie
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

By email only

Thank you for requesting advice on this discharge of condition from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.

Application: DC/19/03032
Location: Land To The East Of Priory Road Palgrave Suffolk
Proposal: Discharge of Conditions Application for DC/17/03178- Conditions 4 (Precautionary Method Statement), 6 (Lighting Design Scheme) 7 (Fire Hydrants), 8 (Details of Estate Roads and Footpaths), 11 (Archaeological Scheme of Investigation) and 12 (Archaeological Works)

Dear Matthew,

Thank you for re-consulting Place Services on the above discharge of condition application. The ecological comments below relate only to Condition 4 (Precautionary Method Statement) and Condition 6 (Lighting Design Scheme).

Condition 4 - Concurrent With Reserved Matters: Submission of a Precautionary Method Statement

No development shall take place (including any ground works or site clearance) until a precautionary method statement for Gt crested newts has been submitted to and approved in writing by the local planning authority. The content of the method statement shall include:

- a) purpose and objectives for the proposed works;
- b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
- c) extent and location of proposed works shown on appropriate scale maps and plans;
- d) timetable for implementation, demonstrating that works are aligned with the proposed
- e) phasing of construction;
- f) persons responsible for implementing the works;
- g) initial aftercare and long-term maintenance (where relevant);
- h) disposal of any wastes arising from works.



The works shall be carried out strictly in accordance with the approved details after the approval of the method statement.

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)

Condition 6 - 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.

Summary:

We have reviewed the submitted Method Statement with regards to Great Crested Newts (Practical Ecology Ltd, December 2018) submitted to meet the requirements of Condition 4. We have also reviewed the Lighting Review (Practical Ecology Ltd, July 2019), Lighting plan (Lewis Nicholls Associates, July 2019 - Drawing -p04_19_0022) & (Palgrave 02 dialux output external lighting report).

We are satisfied that sufficient information has been provided to meet the requirements of Condition 4 & 6. This provides certainty to the LPA that Great Crested Newts will be protected throughout the construction phase, as well as, that impacts to foraging and commuting bats will be negligible during the occupation of dwelling.

This will enable LPA to demonstrate its compliance with its statutory duties including its biodiversity duty under s40 NERC Act 2006.

Conclusion:

Following full implementation of the details contained within the Method Statement with regards to Great Crested Newts and the Lighting plan (In-p04_19_0022 1 & Palgrave 02 dialux output external lighting report), Conditions 4 & 6 can be discharged.

Please contact us with any queries.

Yours sincerely,



Hamish Jackson BSc (Hons) GradCIEEM MRSB
Ecological Consultant
Ecology.placeservices@essex.gov.uk

Place Services provide ecological advice on behalf of Mid Suffolk District Council

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

Place Services

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County Hall, Chelmsford
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Planning Services

Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

14/08/2019

For the attention of: Vincent Pearce

Ref: DC/19/03486 – Land South West Of, Beyton Road, Thurston

Thank you for consulting us on the Outline Planning Application (some matters reserved - access to be considered) for the erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk). This letter sets out our consultation response on the landscape impact of the planning application and how the proposal relates and responds to the landscape setting and context of the site.

Review of submitted information

The Site is located to the south of Beyton Road in Thurston. It consists of a broadly rectangular shaped parcel of arable land, 7.72ha in size and bounded along all sides by minor roads and mature woodland (Twenty Acre Wood) and established tree cover on southern and north western boundaries.

In terms of landscape impact, the proposal will inevitably have an impact on the existing rural character of the edge of Thurston. However, Thurston is classed as a Key Service Centre, which means it has been classed as the main focus for development outside of the towns. Therefore the priority is ensuring that any development that comes forward maintains and enhances the natural environment. Policy CS5 of the Mid Suffolk District Council Core Strategy states that “The Council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape” and “protecting the District’s most important components and encourage development that is consistent with conserving its overall character.” A Landscape and Visual Impact Assessment (LVIA) (Ref. Ref: 18-2379) was submitted as part of the application, The assessment was undertaken using methodology guided by the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA 3) and concluded that “the proposed development can be accommodated within this setting without resulting in significant, long term, adverse impact upon the character of the Site, its immediate context, and the wider landscape context”. We agree with the assessment findings, as long as mitigation measures are provided and managed in perpetuity. This includes new landscape planting to the Site boundaries to provide visual containment and a naturalistic approach to ensure a sense of rurality is retained and inturn the impact on the character of the wider countryside is minimised.

The Suffolk Landscape Character Assessment defines the site and the surrounding area as part of the Plateau Estate Farmlands landscape character type (LCT). This is a flat or gently rolling landscape that is a relatively “new” landscape. In respect of visual impact the nature of this landscape means that it does have more potential capacity to accept development than other LCTs due to its simpler and more modern land cover pattern. The Design and Access Statement (DAS) demonstrates how a detailed analysis has been undertaken to ensure the developed proposal is sympathetic to the



local context. It includes a landscape strategy that shows how an integrated landscape approach has been taken that provides a comprehensive green infrastructure network of different landscape character.

Moving forward I recommend that the following landscape and design thoughts are considered as part of the detailed design:

- The site is bounded by hedgerows and trees but there is scope to enhance these by positive management and new infill planting. Therefore the planting design and species mixes proposed should be carefully chosen. Where possible, infill and structural planting should be carried out in advance of development construction.
- Plot boundaries that face onto the public realm should be brick walls rather than close board fencing.
- Private gardens should be usable rectangular garden shapes.
- Long garden access alleys should be avoided. Instead, we would suggest terraced properties have internal passageways (ginnels).
- Landscape surface treatments should be sympathetic to the rural character of the Site.
- Ensure the indicative drainage pond area is sufficient for its purpose and is easily accessed for long term management. Properties will need to overlook the space and site boundaries.
- The proposed equipped area of play should have a natural character, with primarily timber equipment and natural features (boulders and logs).
- All tree stock should have a minimum girth of 10-12cm to provide visual interest at time of implementation. We would also recommend a number of larger stock trees (16-18cm) are also implemented to provide structure and a sense of maturity to the scheme.

We would also recommend the following reserved matters conditions are considered:

1. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 10 years. Both new and existing planting will be required to be included in the plan.

2. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPING SCHEME.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard and soft landscaping and boundary treatment for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, quantity, location and sizes of the proposed planting. The plans should clearly show the position of new fencing and gates in relation to existing and proposed planting. Tree pit details will also need to be provided for the different planting environments proposed i.e. planted in hard landscaping, close to road boundaries and within the public open space (POS).

3. ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: SUSTAINABLE URBAN DRAINAGE SYSTEM (SUDS) DETAILS

Prior to the commencement of the construction of the dwellings details of SuDS shall be submitted to and approved in writing by the Local Planning Authority. This should include; detailed topographical plans, a timetable for their implementation and a management and maintenance plan.

If you have any queries regarding the above matters please do not hesitate to contact me.

Yours sincerely,

Ryan Mills BSc (Hons) MSc CMLI

Senior Landscape Consultant
Telephone: 03330320591
Email: ryan.mills@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.



Consultation Response Pro forma

1	Application Number	DC/19/03486 Land South West of Beyton Road, Thurston	
2	Date of Response	16/08/19	
3	Responding Officer	Name:	Karolien Yperman
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage Team
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>Based on the information submitted with this outline application, the Heritage Team considers that the proposal would likely cause</p> <ul style="list-style-type: none"> No harm to the surrounding designated heritage assets, as the application site does not contribute to their settings. A low to medium level of less than substantial harm to the significance of a non-designated heritage asset, because the development of the application site would reduce its open countryside setting and connect it to the built-up area of Thurston. 	
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 is an outline application for the erection of up to 210 dwellings within the wider setting of several designated and non-designated heritage assets. The heritage concern relates to the impact of the proposed development on the settings of the heritage assets which contribute to their significance. Only the principle of development and the matter of access is considered.</p> <p>Several designated heritage assets are located in the vicinity of the application site; the Grade II listed Railway Bridge, The Gatehouse (Thurston Place) and The Round House (located in St Edmundsbury district). Other assets, such as the Railway Station, the Fox and Hounds Public House, Thedwastre White House, Thurston House and Pepper Cottage have also been identified in surrounding area, whoever they are unlikely to be affected by the proposed development. The Heritage Statement included with the application contains a thorough assessment of the potential impact of the proposed development on the designated assets, however the Heritage Team has also identified a non-designated heritage asset whose setting could be affected by the proposal: Crossways Cottages.</p> <p>The Railway Bridge is located to the north of the application site. It was built in 1846 by Frederick Barnes of Ipswich to carry the railway line from Ipswich to Bury</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>St Edmunds over Station Road. Its architectural and historic significance is augmented by its connection to the Railway Station and the association to a regionally important architect. The application site is located beyond the densely wooded area at the junction of Beyton Road and Station Road. Because of this separation the site does not contribute to the setting of the Bridge.</p> <p>The Lodge House at Thurston Place is an early-C19 single-storey lodge building to the estate of Thurston House, located to the east of the application site. Its significance is informed by its architectural interest, as well as its association with Thurston House and Thurston Place (historically known as Thurston Cottage, not listed). Due to the distance between them, the application site makes a limited contribution to the wider setting of the Lodge.</p> <p>The Round House is located across the district line in St Edmundsbury, to the west of the site. It is a distinctive former lodge building with walls of random flint, built circa 1840 as a lodge to Rougham Hall. Despite this distinctive form, it is not a prominent building in the streetscape, as it is surrounded by dense woodland to the west, south and east. Similarly to the lodge at Thurston Place, its significance is informed by its architectural interest and its connection to the estate of Rougham, however its secluded, informal landscape setting also contributes positively to its significance. The application site only forms a part of the wider setting of the listed building, and they are not read in the same context. The application site therefore does not contribute to the setting of the listed building.</p> <p>Crossway Cottages are a pair of semi-detached late-C19 cottages. Due to their architectural and aesthetic quality they would be considered non-designated heritage assets. The cottages are located within a generous plot adjacent to the south-western boundary of the application site. Currently their setting is predominantly rural, and they are not experienced in the context of Thurston. The application site provides this separation from the village and therefore contributes positive to the setting of the non-designated heritage assets.</p> <p>As the application site does not contribute tangibly to the setting of the Railway Bridge, the Lodge at Thurston Place or the Round House, residential development on</p>
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		<p>this site would not likely cause harm to their significance.</p> <p>The proposed development would connect Crossway Cottages to the built-up area of Thurston, changing the character of its setting. The indicative layout does appear to show that an undeveloped buffer would remain to the north of the cottages, and that the site boundaries would include soft landscaping. This would reduce the impact of the development on the area immediately surrounding the Cottages. However, there would still be a level of harm associated with the development as it would reduce the open countryside setting of the Cottages.</p> <p>In conclusion, the Heritage Team considers that the development of the application site would likely not be considered to cause harm to the surrounding designated heritage assets. The proposed development would, however, likely be considered to cause a low to medium level of less than substantial harm to the significance of a non-designated heritage asset, because it would detract from its historically isolated rural setting.</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><i>NPPF Para. 197: The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.</i></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.

From: Isaac Nunn <Isaac.Nunn@suffolk.gov.uk>
Sent: 05 November 2019 15:03
To: Vincent Pearce <Vincent.Pearce@baberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>
Subject: RE: Response To Application Number DC/19/1519/OUT at Land Adjacent to Fishwick
CornerThurston RoadRoughamSuffolk

Dear Vincent,

I have just noticed that the reference to the NPPF in my letter and in the reason for the condition is now out-of-date. It should refer to Section 17 of the NPPF, not paragraph 143.

Kind regards,
Isaac

From: Isaac Nunn
Sent: 05 November 2019 14:58
To: Vincent Pearce <Vincent.Pearce@baberghmidsuffolk.gov.uk>
Cc: planningyellow@baberghmidsuffolk.gov.uk
Subject: FW: Response To Application Number DC/19/1519/OUT at Land Adjacent to Fishwick
CornerThurston RoadRoughamSuffolk

Dear Vincent,

I was consulted by West Suffolk on this planning application, which corresponds to Mid Suffolk application DC/19/03486.

Mid Suffolk do not appear to have consulted SCC in our role as Minerals Planning Authority. But since the proposal falls within a minerals consultation area we are required to safeguard potential mineral resources. My recommendation to West Suffolk, detailed in the attached letter, therefore equally applies to the planning application that you are considering.

Please do not hesitate to get in touch if you have any questions.

Kind regards,

Isaac Nunn
Planning Officer
Growth, Highways & Infrastructure
Suffolk County Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

Tel: 01473 265248
Mob: 07751 400039

 [Planning, waste and environment](#)

 *Please consider the environment before printing this e-mail*

Your Ref: DC/19/1519/OUT
Our Ref: SCC/CON/4638/19
Date: 4 November 2019
Enquiries to: isaac.nunn@suffolk.gov.uk



The Planning Department
West Suffolk Council
Development Management
West Suffolk House
Western Way
Bury St Edmunds
Suffolk
IP33 3YU

For the attention of: Julie Barrow

Dear Julie,

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN:**

PROPOSAL: Outline Planning Application (means of access to be considered) - (i) proposed improvement to Fishwick Corner in West Suffolk Council and (ii) 210no. dwellings means of access, open space and associated infrastructure, including junction improvements with all proposed development located within Mid Suffolk District Council.

LOCATION: Land Adjacent to Fishwick Corner Thurston Road Rougham Suffolk

The Environmental Study and Minerals Investigation dated 04 July 2019 notes that the site contains sand deposits which may be suitable for incidental extraction. Therefore I recommend attaching the below condition to any planning permission which may be granted to ensure that mineral resources are not needlessly sterilised in accordance with paragraph 143 of the National Planning Policy Framework, Policy 5 of the adopted Suffolk Minerals Core Strategy (2008), and Policy MP10 of the emerging Suffolk Minerals & Waste Local Plan.

Condition: Prior extraction of minerals

The first application for approval of reserved matters shall include a scheme for the prior extraction of mineral resources to be approved by the Local Planning Authority in consultation with the Minerals Planning Authority. The scheme shall provide:

- an assessment of the type and quantity of minerals to be extracted;
- a plan or plans showing the phasing of mineral workings;
- a plan or plans showing the location of plant and equipment located on site during extraction works;
- cross-sections showing existing, extraction and restored levels;
- details of the proposed use of extracted material, including (where practical) the use of extracted mineral in the construction of this development;
- a programme for implementation of the prior extraction scheme.

The scheme shall be carried out in full in accordance with the approved details.

Reason: to prevent the needless sterilisation of mineral resources and in accordance with paragraph 143 of the NPPF and Policy MP10 of the Suffolk Minerals and Waste Local Plan.

Please do not hesitate to get in touch if you have any questions about my consultation response.

Yours sincerely,

Isaac Nunn

Planning Officer

Planning Section

Strategic Development - Growth, Highways & Infrastructure

Your Ref: DC/19/1519/OUT
Our Ref: SCC/CON/4638/19
Date: 11 November 2019
Enquiries to: isaac.nunn@suffolk.gov.uk



The Planning Department
West Suffolk Council
Development Management
West Suffolk House
Western Way
Bury St Edmunds
Suffolk
IP33 3YU

For the attention of: Julie Barrow

Dear Julie,

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN:**

PROPOSAL: Outline Planning Application (means of access to be considered) - (i) proposed improvement to Fishwick Corner in West Suffolk Council and (ii) 210no. dwellings means of access, open space and associated infrastructure, including junction improvements with all proposed development located within Mid Suffolk District Council.

LOCATION: Land Adjacent to Fishwick Corner Thurston Road Rougham Suffolk

Following my previous consultation return I have had the opportunity to speak to the authors of the Environmental Study and Minerals Assessment. I would like to update my advice, specifically the recommended condition, to reflect the agreed outcome of those discussions.

Condition: incidental extraction of minerals

The first application for approval of reserved matters shall include a minerals management plan detailing the incidental extraction of mineral resources to be approved by the Local Planning Authority in consultation with the Minerals Planning Authority. The plan shall provide:

- a summary of existing ground investigation information with respect to the classification of site-won minerals and the determination of their quality;
- an assessment of the extent to which minerals extracted are suitable for use in the construction of the development;
- details of likely site-won volumes, requirements for filling works, and the methods for managing any surpluses;
- drawings and/or figures as necessary to illustrate those methods.

The minerals management plan shall be carried out in full in accordance with the approved details.

Reason: to prevent the needless sterilisation of mineral resources and in accordance with paragraphs 203-206 of the NPPF and Policy MP10 of the Suffolk Minerals and Waste Local Plan.

Yours sincerely,

Isaac Nunn

Planning Officer

Planning Section

Strategic Development - Growth, Highways & Infrastructure