

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG



Tel: 01359 232854

e-mail: info@thurstonparishcouncil.gov.uk

SENT AS AN E-MAIL

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

23rd May 2019

Dear Mr. Isbell,

Re: DC/19/02090 - Proposal: Outline Planning Application (some matters reserved)- Erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space(s), children's play area and sustainable drainage system (SuDS), to include 35% affordable dwellings. Location: Land East Of Ixworth Road, Thurston.

Case Officer: Vincent Pearce

The Parish Council, having considered this application at its Planning Committee Meeting on 22nd May 2019, would like to confirm that it objects to this application in its entirety.

Whilst it acknowledges that the applicant met with the Parish Council for a pre-application discussion, it has failed to take any regard of the comments made at that meeting and has failed to take effective note of the workings of the Thurston Neighbourhood Development Plan (NDP) which has now passed its examination stage. The Examiner has 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 is felt by the examiner that the Thurston NDP will provide a strong practical framework against which decision on development can be made and as such the Parish Council contend 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 Built- Up Area Boundary of Thurston. This application on land to the east of Ixworth 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. 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.
3. 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. Whilst it is for the Joint Local Plan to ultimately address the objectively assessed housing need of Mid Suffolk district over the period to 2036 and also to determine Thurston's contribution to that, given the levels of growth in the planning pipeline; the 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.

4. As previously stated, 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 both 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.
5. Thurston Parish Council therefore objects to this application on the grounds that there are no 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.”

The Parish Council also feels that as there has been no further update from Suffolk County Council on how future growth will be mitigated, these serious limitations within the highways network which have no quick or simple solution must be addressed prior to further development being considered.

6. 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. Indications are that a significant number of parents will continue to support their school choice and as such there will be a negative impact on the rural infrastructure with an anticipated increase in the numbers travelling to and from school via car.
7. It is felt that further exacerbation of traffic issues at this point in the village will occur given the close proximity of this site on Ixworth Road to the large-scale development taking place further along Ixworth Road and the potential increase use of the rear of the car park to the rear of the College as a parking facility for parents dropping off and collecting children from the College.
8. Further concerns to be raised cover the following:
 - Density of the build – the Parish Council is concerned that there is an urban feel to the design which neither complements nor enhances the village. Overall the spatial strategy is of a poor design not in sympathy with the village character and fails to take into account guidance as given within Suffolk County Council’s (2000 revised) Suffolk Design for Residential Areas, or even the Government’s Manual for Streets and Manual for Streets 2 as well as Historic England’s Streets for All documents. It further fails to take account of Policy 4: Retaining and enhancing Thurston Character through residential design of the Thurston NPD as it fails to deliver housing design that fits in with the surrounding area and is in character with that of a rural village rather than that of an urban location.
 - Type of dwellings – overall the Parish Council has a concern that the application has failed to demonstrate that the housing mix is justified with regard to planning policy, the local context and viability. There is a failure to provide a housing mix that will create a broad-based community as it fails to consider incorporating a range of property sizes and types and the Parish Council is concerned that the overall design neither complements nor enhances the village.
 - Within the northern side of the village, there are no 2.5 storey dwellings built within the vicinity of this site. The Parish Council is concerned that their inclusion at different roof heights from the surrounding

dwelling will provide for a street scene that is neither in keeping with the surrounding area nor enhancing of the area as a whole.

- The Parish Council is also concerned at the paucity of bungalows within the application and feels that the overall scheme does not represent a consideration of the need locally in terms of demand and those wishing to downsize from existing dwellings. It 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. Overall the Parish Council has a concern with the size of the smaller dwellings and would request that all properties are built to current Nationally Described Space Standards as published March 2015.
- The traffic survey undertaken on behalf of the applicant has failed to take into account the school finishing times and instead concentrated on the peak times of 7-9am and 5-7pm. There has been a failure to take into account the impact on this area of traffic movements and in particular the narrowness of Ixworth Road and the movement of young people at Ixworth Road to gain access to the College and planned Primary School to be located along Norton Road.
- Lack of landscaping detail – overall the detail the landscaping of the site overall is limited and fails to provide details in particular of the species to be used in terms of trees and shrubs along with details of the 5-year care plan to be implemented. Further details on the hard and soft landscaping to be used should be submitted and must allow for public and private spaces to be clearly defined and soften the edge of the development leading into the countryside which it abuts. Furthermore, the Parish Council would like to see species that will form a strong and effective boundary, such as hedge forming shrubs rather than exotic or ornamental plants and will wish to ensure that there is sufficient detail and budget provision allocated to ensure a high-quality boundary scheme is delivered. Appropriate landscaping should be used to ensure that boundaries are respected and that residents would feel that their personal space is protected. There is also little detail on the landscaping for the SUDs area and this should have accompanied the application along with further details on planting features including species to be used.
- The Parish Council has requested on similar applications that there should be a greater emphasis on appropriate soft landscaping to the street scene in order to protect the visual amenity of the area as well as further enhancements to the public open spaces to create a strong green infrastructure and attractive outlook from properties and to ensure the biodiversity of the site is maintained.
- Generally the Parish Council feels that the green space area located to the north of the site is in the wrong space to allow it to come forward as an open space area. The open space should be located to the southern part of the development and contain facilities that are available for all to use as they would be located within reasonable walking distance of the majority of the units within the development scheme as well as those nearby. Such a facility should be of a demonstrable recreational or amenity value and should be multi-functional.
- A PROW runs to the southern edge of the site which will be severely compromised by a significant loss of views and amenity from the PROW. There are important views across the site to the north looking out of the area and the proposal will detrimentally impact on those views looking out of the area.
- To the east of the site is Meadow Lane which is a Green Lane. This lane is unmetalled and vegetation is allowed to colonise freely. The Parish Council is concerned that the proposal will negatively impact on its status as a Green Lane and highlights that there is no provision for maintenance of this lane given the proposal to create pedestrian links to this area to allow connectivity.

In summary, the Parish Council contends that this application should not be supported as it fails to adhere in the main to POLICY 4: RETAINING AND ENHANCING THURSTON CHARACTER THROUGH RESIDENTIAL DESIGN of the Thurston NDP which states that development proposals as submitted, must demonstrate how they contribute to the features which positively define Thurston's character, taking into consideration the Thurston Character Assessment 2017 – Revised 2018. The development does not protect the amenity of neighbours, nor does it reflect the scale, mass, height and form of neighbouring properties. According to the examiner there is robust background evidence within the Character Assessment to support policy 4 to help ensure that new development contributes towards the positive aspects of local character. The Parish Council requests that the desires to 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: Penny Otton (SCC) <penny.otton@suffolk.gov.uk>

Sent: 14 August 2019 09:54

To: Philip Isbell <Philip.Isbell@baberghmidsuffolk.gov.uk>

Cc: Parish Meeting - Thurston <info@thurstonparishcouncil.gov.uk>

Subject: planning application DC/19/02090; land east of Ixworth road thurston

I wish to make the following comments;

Following a meeting with the application and the parish council it is obvious that this application should be refused.

The cumulative effect of the numerous applications and permission granted must be taken seriously . The Thurston spatial strategy clearly states that any further permission should only be within the settlement boundary.

The issue of impact on the highways in and around Thurston is now at a critical position and cannot withstand any further traffic movements. Suffolk county council highways have clearly indicated that this is unsustainable. The location of the site in relationship to Thurston Community college is of serious concern, with the possibility of another 600 car movements to and from the college particularly at the start and end of the school day.

Suffolk County Councillor; Penny Otton

From: Ipswich, Planning <planning.ipswich@environment-agency.gov.uk>
Sent: 23 May 2019 08:01
To: BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: RE: DC/19/02090 - Land to the East of Ixworth Road, Thurston

Good Morning,

Thank you for your email. This consultation has been logged as being outside of our consultation checklist. Please see the attached checklist which outlines when to consult the Environment Agency. If you believe the application ticks any of the attached triggers, please do let me know.

Kind Regards

Liam

Liam Robson

Sustainable Places Planning Advisor – East Anglia Area (East)

Environment Agency | Icen House, Cobham Road, Ipswich, Suffolk, IP3 9JD

liam.robson@environment-agency.gov.uk

External: [02084 748 923](tel:02084748923) | Internal: [48923](tel:48923)

Working hours: Monday to Friday 7am-3pm

Upcoming Annual Leave: 24/5 to 3/6 inclusive



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

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





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Our ref: WSCCG/010519/THU
Email: planning.apps@suffolk.nhs.uk
Date: 16/04/2019

Your Ref: DC/19/02090

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)- Erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space(s), children's play area and sustainable drainage system (SuDS), to include 35% affordable dwellings.

Location: Land East Of Ixworth Road, Thurston

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

Background

2. The proposal comprises a development of up to 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 are 2 GP practices and a branch practice closest to the proposed development and these are within circa 6km. These practices do have sufficient capacity for the



West Suffolk
Clinical Commissioning Group

West Suffolk House
Western Way
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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 will not 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 (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Mount Farm Surgery	12,713	920.72	13,427	49
Ixworth Surgery (and its branch Stanton Health Centre)	10,077	583.70	8,512	44
Total	22,790	1,504.42	21,939	93

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 Mount Farm Surgery and Ixworth Surgery and its branch Stanton Health Centre, servicing the residents of this development, will not be sought from the CIL contributions collected by the District Council.

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



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7. 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.
8. 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



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: 147087/1/0058331

Local Planning Authority: Mid Suffolk District

Site: Land To The East Of Ixworth Road Thurston Suffolk

Proposal: Outline Planning Application (some matters reserved)- Erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space

Planning application: DC/19/02090

Prepared by: Pre-Development Team

Date: 23 May 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: - Foul Drainage analysis 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. (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)

From: SM-NE-Consultations (NE) <consultations@naturalengland.org.uk>
Sent: 08 May 2019 08:10
To: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>
Subject: DC/19/02090 Consultee Response

Dear Sir or Madam,

Application ref: DC/19/02090
Our ref:281602

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

Julian Clarke
Consultations
Natural England
Hornbeam House, Electra Way
Crewe Business Park
Crewe, Cheshire CW1 6GJ

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

www.gov.uk/natural-england

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

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/19/02090

PROPOSAL: Outline Planning Application (some matters reserved) - Erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space(s), children's play area and sustainable drainage system (SuDS), to include 35% affordable dwellings.

LOCATION: Land East Of Ixworth Road, Thurston

We recommend a holding refusal for the application for the following reasons:

Road Safety - The impact the development on safety highway is to be considered within the area, especially Fishwick and Pokeridge junctions as there have been 10 and 3 accidents respectively so a full analysis is required. The Applicant's attention is drawn to the fact that the improvements planned for delivery via the S106 process 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.

Transport Infrastructure (Cumulative Impact)

- A highway infrastructure list was created for highway improvements in the area following the communitive impact assessment completed by AECOM for the 5 committed developments in 2017. The suite of improvements, in the opinion of the Local Highway Authority, mitigated the harm of the five developments but took the infrastructure to its maximum in terms of capacity and safety.
- The Applicant will need to provide additional mitigation (if deliverable) or data to show that no further mitigation is required for their development to the satisfaction of the Highways and Planning.

Transport Assessment -

- The transport assessment does not provide sufficient information to determine the impact the additional traffic from the development will have on the highway network.

- Traffic models or junction analysis have not been provided showing the impact this development (with the committed sites within Thurston) have on any of the junctions within Thurston or key junctions on the edge of the village.
- The TRICS identified in the assessment are for sustainable towns instead of villages which gives underestimated and optimistic trip rate results therefore, not a true reflection of future movement patterns/numbers or how the residents of the development will travel. We consider the information given are showing misleading results.
- measures to improve the accessibility for pedestrian or cyclist have not been provided to the village amenities which will in turn promote and improve sustainable travel.

There is strong local resistance to any further development in Thurston; especially regarding the capacity and safety of existing highway infrastructure and the concern on affect the approved 5 sites had will have on the existing facilities. If the applicant wishes to proceed with the application, we suggest that the modelling is very thorough, all the committed developments are considered.

Travel Plan

- The Travel Plan fails to acknowledge the Suffolk County Council Travel Plan Guidance www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/travel-plans/
- The primary provision of information to residents using display boards across the site is unacceptable. A Residents Travel Pack should be provided to promote the sustainable transport opportunities and provide incentives, such as bus tickets and cycle vouchers
- The other measures identified in the Travel Plan are generic and are not specifically tailoring them to this development (e.g. the car sharing section fails to mention either Liftshare or Suffolk Car Share)
- The Travel Plan monitoring methodology is not suitable as it is not monitored annually after occupation of the 100th dwelling and then monitored for a minimum of five years, or one year after occupation of the final dwelling (whichever is the longest duration).
- The targets and monitoring of the Travel Plan should be based on the trip generation data provided in the supporting Transport Assessment, as this will link in with the transport modelling and highway impact the site will generate.
- Resident questionnaires should still be used, but as a supplementary form of monitoring due to them not yielding high response rates (even with incentives offered)
- There is no acknowledgement of the other committed development in Thurston, as there might be an opportunity to join up all the Travel Plan's across Thurston to maximise the effectiveness of the sustainable transport measures across the village

At present, we would recommend that permission for the application has a holding refusal unless the above points can be addressed, and we look forward to receiving further information.

Yours sincerely,

Samantha Harvey

Senior Development Management Engineer

Growth, Highways and Infrastructure

Growth, Highways and Infrastructure
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Philip Isbell
Corporate Manager - Development Manager
Planning Services
Babergh and Mid Suffolk District Councils
Endeavour House
8 Russell Road
Ipswich IP1 2BX

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

Our Ref: 2019_02090
Date: 9th May 2019

For the Attention of Vincent Pearce

Dear Mr Isbell

Planning Application DC/19/02090/OUT – Land to the east of Ixworth Road, Thurston: Archaeology

This large site has high archaeological potential. Recent archaeological investigations immediately to the west have identified the remains of a Roman road and features of prehistoric date (THS 030) and to the east, further prehistoric features have been defined, as well as a human inhumation (THS 031). However, this site has never been the subject of systematic archaeological investigation and there is high potential for previously unidentified archaeological remains to be present. The proposed development would cause significant ground disturbance that has potential to damage or destroy any below ground heritage assets that exist.

Given the high potential, lack of previous investigation and large size of the proposed development area, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site prior to the determination of any planning application submitted for this site, to allow for preservation *in situ* of any sites of national importance that might be defined (and which are still currently unknown). This large area cannot be assessed or approved in our view until a full archaeological evaluation has been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 189 and 190 of the National Planning Policy Framework.

Decisions on the suitability of the site, and also the need for, and scope of, any further work should below-ground heritage assets of significance be identified, will be based upon the results of the evaluation.

In order to establish the archaeological potential of the site, a geophysical survey will be required in the first instance. The geophysical survey results will be used to make a decision on the timing and extent of trial trenched evaluation which is required at this site. The results of the evaluation should be presented as part of any planning application for this site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important heritage assets within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation.

Further details on our advisory services and charges can be found on our website:

<http://www.suffolk.gov.uk/archaeology/>

Do let us know if you require any further information.

Yours sincerely,

Rachael Abraham

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/F305782
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 14/05/2019

Dear Sirs

Land to the East of Ixworth Road, Thurston
Planning Application No: DC/19/02090/OUT
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: Gladman Developments Ltd, Gladman House, Alexandria Way, Cngleton
CW12 1LB

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: 14 May 2019

Planning Ref: DC/19/02090/OUT

Dear Sirs

**RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land to the East of Ixworth Road, Thurston
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/19/02090
 Our ref: Thurston – land east of Ixworth Road
 58833
 Date: 12 November 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 east of Ixworth Road – developer contributions

I refer to the proposal: outline planning application (some matters reserved) – erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space(s), children's play area and sustainable drainage system (SuDS), to include 35% affordable dwellings.

This letter updates and replaces the previous consultation response letter dated 04 May 2019.

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.

The NPPF (revised February 2019) highlights the importance in paragraphs 38 – 46 of pre-application engagement and front-loading. The applicant has failed to undertake pre-application engagement with the County Council which is contrary to guidance set out in the NPPF. There are important and fundamental infrastructure issues that must be addressed by the applicant in order to ensure the delivery of sustainable development.

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.

New CIL Regulations were laid before Parliament on 4 June 2019. These Regulations (Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019) came 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' [November 2019], which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations [revised September 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.

The above approach was endorsed in the recent appeal relating to land to the south of Norton Road, Thurston, Suffolk (Appeal Reference APP/W3520/W/17/3172098), in which the Inspector considered the position for proportionate land and build costs to a new primary school and early years setting. Paragraphs 39 to 41 cover this, stating:

“Para 39. In the context of school places it is suggested that a consequence of the cumulative developments in the area could be that a new school with new preschool facilities would be required. The sec 106 agreement secures this sites proportionate contribution to those facilities based on the likely pupil population generated by the development. These are new facilities and are not covered by the CIL 123 list provision for education which relates to the improvement of existing

facilities. In this case they are necessary and required and related to the scale and kind of development and meet the appropriate tests.”

“Para 40. In the event that the new school is not required or in the interim the existing schools would be upgraded with temporary provision through the CIL funding.”

“Para 41. Overall I am satisfied, for the reasons given above, that the proposals would make adequate provision to address the effects of the development on the social and community infrastructure in the area.”

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.

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 2019).

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 x £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. Monitoring fee. The new CIL Regs allow for the charging of monitoring fees. In this respect the county council charges £500 for each trigger point in a planning obligation, payable upon commencement.

15. 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, Suffolk County Council
Floods Planning, Suffolk County Council

Dear Vincent Pearce,

Subject: Land East Of Ixworth Road, Thurston Ref DC/19/02090

Suffolk County Council, Flood and Water Management have reviewed application ref DC/19/02090.

The following submitted documents have been reviewed and we recommend a **holding objection** at this time:

- Site Location Plan Ref CSA/4164/109 Rev A

The reason why we are recommending a holding objection is because the applicant has not submitted an assessment of the flood risk to the site and has not provided a viable method for the disposal of surface water in line with national and local policy/guidance.

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

1. Submit a flood risk assessment for the site
2. Submit a surface water drainage strategy with supporting documents/evidence as per the table below

Those highlighted in red have not been received and should be submitted in support of the application.

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

Kind Regards

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

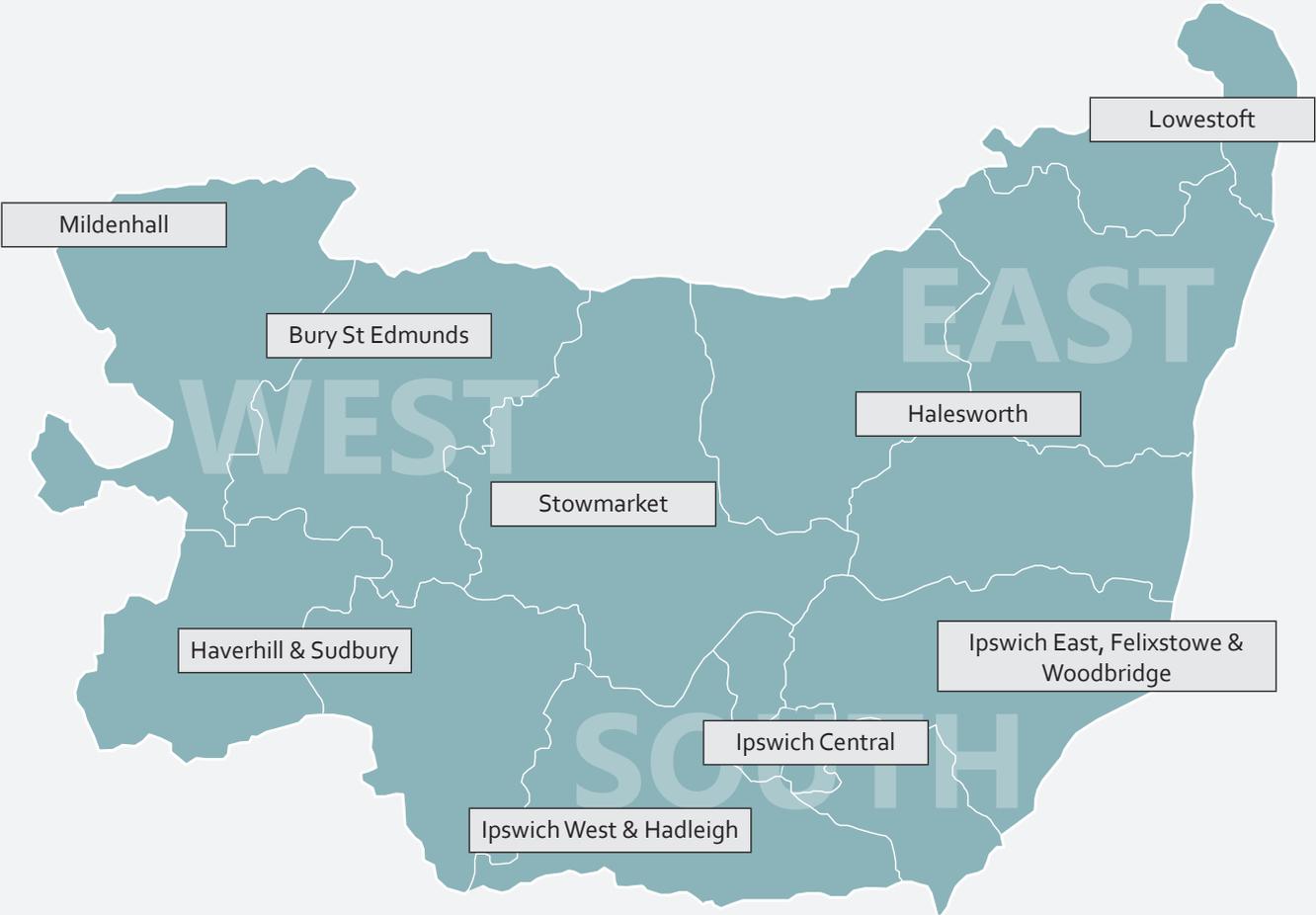


RESIDENTIAL DESIGN GUIDE



SUFFOLK
CONSTABULARY

County Policing Map



Crime Prevention Works
Play Your Part

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CONTACT

East

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Tel: 01284 774141

South excluding Ipswich and Kesgrave

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Tel: 01473 613888 ext. 3254

Ipswich and Kesgrave

Email: lucy.mures@suffolk.pnn.police.uk

Tel: 01473 613888 ext. 4141

Other Important Links

- www.securedbydesign.com
- www.suffolk.police.uk/advice/crime-prevention-z

Introduction

The purpose of this document is to encourage designers and developers to consider the impact of design on crime.

Crime, fear of crime and anti-social behaviour all have negative impacts upon community well-being and quality of life.

As well as the direct costs of crime experienced by its victims, fear of crime contributes to social exclusion, particularly for vulnerable groups such as women, older people, children and people from ethnic minorities.

Crime also threatens the success and vitality of town centres and employment areas by acting as a brake on economic growth and prosperity.

Promoting principles of design known to reduce the opportunity for crime to occur is one of the most important ways in which Local Authorities can address crime issues.

Layouts and designs have the potential to make crimes more difficult to commit, increase the likelihood of detection of criminal activity and improve public perceptions of safety.

National Planning Policy makes clear that crime prevention should be a material consideration

in determining planning applications. Local councils in Suffolk recognise this and most refer to crime prevention in their local design policies.

The Crime and Disorder Act 1998 (in particular section 17) places a duty on local authorities to exercise their functions with regard to the likely effects of crime and disorder in their areas in partnership with the police and other public bodies.

We hope that you will work with us to ensure that all aspects of crime prevention are taken into consideration when planning new residential developments to create safer communities.



**Assistant Chief Constable
Rachel Kearton**



Purpose of this guidance

The Home Office's, 'Modern Crime Prevention Strategy' identifies the importance of crime prevention in reducing the opportunity to commit crime. Evidence suggests that making the surrounding environment less conducive to crime, (by designing out crime), will make a significant reduction on the demand that crime incurs for the Police Service and other Authorities.

Designing out crime is pivotal to the sustainability to an area. Developers should be encouraged to seek advice from the Designing Out Crime Officer (DOCOs) at an early stage to ensure that their proposals positively impact on crime prevention objectives.

The aim of this document is to provide clear guidance for developers and planners on how to apply the essential principles of designing out crime before a planning application is submitted.

The guidelines set out in this document are based on current best practice; and incorporate guidance from Secured by Design and should be used to:

- Ensure that community safety and crime prevention issues are addressed within planning.
- Enable crime prevention issues to be considered from the earliest stages of project planning through discussions between the Council, developers and designers.
- Negotiate design changes with developers
- Promote creative and innovative solutions for the design and lay-out of the physical environment, to ensure that all new developments contribute to the aims of reducing crime, fear of crime and anti-social behaviour.

- Encourage the highest possible standards of design in all new developments to provide attractive, stimulating and safe places in which to live and work and prevent development that would put people or property at risk.

Where appropriate, planning officers should encourage closer working with the Police Designing Out Crime Officers to assess pre-application submissions in order to overcome any possible problems before designs are finalised.

Applying the Guidance to Planning Applications

Greater focus is now placed on sustainability and community benefit within planning.

Development management is pivotal to ensuring that all proposals incorporate designs and layouts that will reduce crime, fear of crime and anti-social behaviour.

Planning officers can request that these considerations can then form part of the Design and Access Statement.

This is especially relevant for residential schemes of ten or more units or sites over half a hectare.

This is supported by the Chief Planner, Steve Quartermain CBE.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/627395/Chief_Planner_letter_-_security_and_planning.pdf

National Planning Policy Framework

Within the National Planning Policy Framework Paragraph 91b. states that planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

Additionally Paragraph 127(f) of the NPFF states that planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users 46; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.



Secured by Design

Secured by Design



Official Police Security Initiative

Secured by Design is a police initiative to guide and encourage those engaged within the specification, design and build of new homes, and those undertaking major or minor property refurbishment, to adopt crime prevention measures. The advice given by SBD and reflected in this guide has been proven to reduce the opportunity for crime and the fear of crime, creating safer, more secure and sustainable environments. Secured by Design is owned by the Police Service and is supported by the Home Office and referenced by the Department for Communities and Local Government in Approved Document Q.

Suffolk Police always advise developers to seek 'Secured by Design' accreditation in consultation with their Designing Out Crime Officer at the earliest stages of project planning.

Even when developers are not intending to apply for SBD accreditation, they should negotiate with the DOCO to ensure that the principles of Crime Prevention Through Environmental Design (CPTED) are applied. More information can be found at:

<http://eucpn.org/document/cpted-manual-police-officers>

Controlling Access and Movement

Good designs and layouts play a key role in tackling crime and social exclusion by creating better connected and more accessible environments without compromising security.

The success of a place as part of a sustainable community is strongly influenced by movement choices within the site and the quality of its connections to local services, amenities and pedestrian routes.

Layouts with too many under-used connections and large networks of indirect, poorly-lit and segregated pedestrian routes providing access to the rear of buildings can create opportunities for crime and escape routes for criminals. On the other hand, layouts with too few connections to local amenities and public routes can restrict freedom of movement and create dead ends.

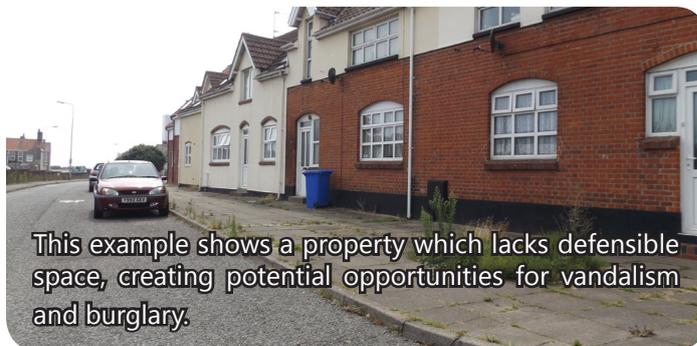
A good 'movement framework' provides convenient, overlooked and well-used principal routes that lead directly to where people want to go. This removes the need for underused alleyways, footpaths, shortcuts and minor access.



Local Ownership and Defensible Space

A good design can encourage a sense of local ownership and people who are proud of their community will tend to look after it better. They are more likely to look out for each other and do all they can to deter anti-social behaviour and crime.

Crime and anti-social behaviour is more likely to occur if users are unclear whether space is public or private, and are unaware of the behaviour expected in each. Defensible space or buffer zones can be created where real or symbolic barriers clearly define private or semi-private space.



This example shows a property which lacks defensible space, creating potential opportunities for vandalism and burglary.



The walls in front of these properties define the ownership of the front gardens whilst allowing views over them

Natural Surveillance

Good natural surveillance both to and from streets, public routes and open spaces is key to reducing crime in residential areas. There are many ways in which the design and layout of dwellings can optimise surveillance while maintaining privacy.

The location of active rooms and window orientations should ensure good natural surveillance both to and from the street.

Windowless elevations or blank walls adjacent to space which the public have access to, generally flanking a row of terraced dwellings, should be avoided and at least one window should be provided wherever possible.



Permeability

The balance between permeability and accessibility is always a delicate one. From a police perspective, we want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is often about being able to get people from A to B, preferably not in their cars.

We encourage designers look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community.

There is no blanket approach and each development is different.

Developers are advised to consult the DOCO early in the design stage.



Although this site has good permeability and through routes for both pedestrians and vehicles, the layout has perimeter blocks that ensure well fronted streets and secure private rear gardens.

Orientation of Dwellings

Residential developments should face onto the most public side of streets, footpaths, public spaces or watercourses as appropriate.

Room and window orientations should ensure good natural surveillance both to and from the street, with at least one habitable room fronting the street at ground floor level to enable residents to oversee access to their properties.



Active frontage

Active frontages made up of front doors and windows (especially to ground floor habitable rooms) create lively and well-supervised streets. This is a key requirement for creating safe and attractive public spaces.

Keeping gaps between buildings and avoiding blank walls and garden fences which face the street are important considerations. To achieve this, long perimeter blocks, wide frontage dwellings and bespoke dual-fronted corner dwellings can all contribute to active frontage.

Although the example above shows good consideration for active frontages, there are areas where there are blank gable walls adjacent to footpaths. This should be avoided.

Footpaths and Cycleways

Public footpaths and cycleways should:

- Be well-overlooked by neighbouring properties.
- Be straight and wide to maintain good visibility along their route, ensuring that any recesses or gaps between buildings are closed off by a wall or railings.
- Run alongside one another where possible and not be segregated, ensuring a combined width of at least 4 metres, subject to maintaining the need for road safety.
- Not be located along the backs of properties where there is limited natural surveillance.
- Avoid having sharp changes in direction which cause blind spots.



Narrow and under-used footpaths with limited observation are perceived to be threatening and create opportunities for crime.

Private, Communal and Public Areas



All private areas, such as back gardens or backyards should be fully enclosed by the backs of dwellings and avoid adjoining side roads, service roads or footpaths.



Definition of private and public space can be achieved with fences or walls or just the use of different materials.

Communal Areas

Communal areas around residential developments should restrict access for residents only through the use of lockable doors or gates with intercom facilities.

Access to flats should be restricted by the use of remote access audio/visual access control with no tradesperson release facility. Access should further be restricted to the residents floors only. Entrance/exit points and stairwells should be covered by CCTV capable of being remotely monitored.

Public Areas

Providing adequate and well maintained public spaces to serve residential developments can make an important contribution to community safety and well-being by raising levels of activity in the public domain and providing valuable local facilities for all age groups.

Poorly planned spaces with limited surveillance can increase the risks of vandalism and provide access to surrounding properties.

Public spaces should be fronted by dwellings and not backed onto by private rear boundaries or back gardens.



Children's play areas should be well secured, and signage should clearly indicate the intended use relating to a specific age group.

Children's play areas should be located sufficiently close to nearby residential properties to ensure observation but at an appropriate distance to ensure no nuisance from noise.

Front Boundaries

Front boundaries should ideally be around 1 metre in height and permit views through or over them. Railings are often the best option in areas vulnerable to graffiti.

Obscured views to and from the street and the presence of potential climbing aids create ideal conditions for potential intruders.



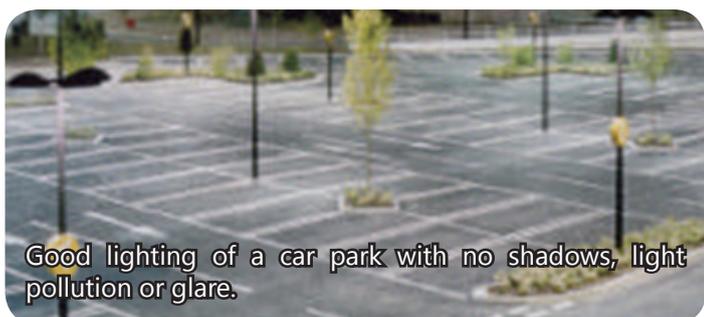
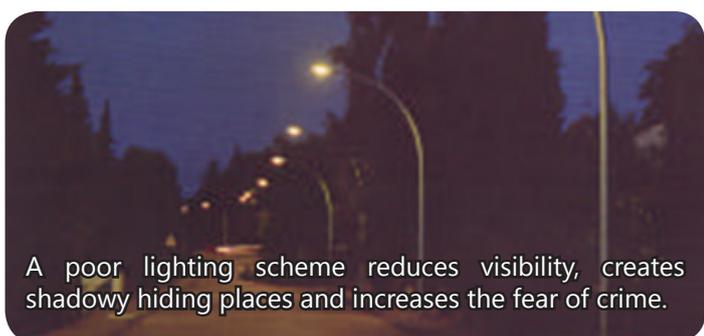
Rear and Side Boundaries

Vulnerable areas, such as exposed side and rear gardens, need more robust defensive barriers by using walls or fencing to a minimum height of 1.8m.

There may be circumstances where more open fencing is required to allow for greater surveillance.

Trellis topped fencing can be useful in such circumstances.

Additional deterrent features such as increasing the height of fencing or planting thorny shrubs may be considered as an alternative.



Lighting

Good lighting makes an important contribution to creating a safer and more attractive environment. Providing a good quality and consistent level of lighting can be an effective crime deterrent by enhancing the opportunity for natural surveillance and increasing pedestrian activity after dark.

Not only is criminal activity more likely to be noticed, it is also more likely to be challenged and/or reported by members of the public. It is well established that lighting uniformity is more important in reducing crime than absolute lighting levels.

Developers should ensure that all exterior lighting meets the relevant European and UK standards for both minimum and average luminance.

DOCOs can be consulted on the type and level of lighting proposed and can consider this in relation to the type and use of the area.

All new lighting proposals should minimise light pollution in line with current environmental requirements either locally or nationally.

Landscaping

The way that landscaping is designed can encourage, or discourage, levels of activity. Well designed street furniture and art can be effective in creating an attractive and more distinctive environment. Seats, bus stops, taxi ranks and bins should be positioned to encourage their use, and be in positions that will not obscure views of users, obstruct pedestrian movement, encourage anti social behaviour or assist unauthorised entry.

Trees and shrubs can be highly beneficial in creating attractive spaces that draw in plenty of legitimate activity. However, they can also create hiding spaces and reduce visibility which may discourage people from using a space or pathway.

To avoid this, landscaped areas such as parks, footpaths and open spaces should be designed to maintain a good level of natural surveillance, as well as being visually appealing.

Trees and other landscaping features should be positioned so that they do not create hiding spaces or obscure lighting. Clear sightlines should be maintained over long distances (25 metres or over).

There will be greater visibility if trees in public areas do not have foliage below 2 metres from the ground, while low level planting should not exceed 1 metre in height.

Examples of good practice can be seen below:



In-Curtilage Parking

Residential parking should be provided on driveways or in purpose built garages within the curtilages of dwellings and located close to and visible from the owners' dwellings wherever possible. Dwellings with integral garages should ideally have the front door and a habitable room window to the front elevation.

Garages to the rear of a property's garden should have controlled access via a private gate for safety and security. If no in-curtilage parking is possible, parking in residential developments should be provided where cars can be seen by the householder.

Car ports and undercroft parking should be avoided. They restrict natural surveillance of vehicles and sometimes entrances to dwellings. This puts the vehicles, dwellings and any items stored in this area at greater risk of theft or damage.



Communal Parking

Communal parking, for example, where flats are proposed, should be well lit (see Section on Lighting), readily accessible and visible from the owners' dwellings.

There should be a direct, safe pedestrian route from the dwelling to the parking space.

Large communal parking areas should be subdivided through appropriate planting, and making particular spaces more clearly related to the developments they serve.

Rear courtyard parking should be avoided where possible.



Surface Car Parks

Surface car parks should create a pedestrian-friendly environment with level surfaced areas to cater for all members of the community.

Pathways should be well defined, readily accessible from parking bays, lead directly to the facilities served by the car park and located away from high walls or densely planted areas.

Signs should be clearly visible and visual markers used to aid ease of movement.

Dead ends, blind corners or solid walls reducing visibility should be avoided.

All parking spaces, pathways and circulation routes should be well lit with good natural surveillance from nearby buildings and well-used routes, particularly in car parks for sports, recreational or entertainment facilities, which are used more often at night time.

Large parking areas should be subdivided. Landscape planting used for defining spaces should not obscure views or vehicles, create hiding places or litter traps.



Well designed and cared for planting means that this car park looks attractive and sight lines are kept clear.

Access to and from Underground and Under-Storey Car Parks

Underground or under-storey car parks should ensure that:

- Vehicular access points are electronically controlled (the use of simple pole barriers is not acceptable as they do not restrict pedestrian access).
- External pedestrian entrances are kept separate from vehicular access points and gained internally via locked stairwells.
- All pedestrian access doors should comply with 'Secured by Design' specifications for external doors.



Controlled access points kept separate from pedestrian entrances are essential in multi-storey and under storey car parks.

Future Care and Maintenance

Effective management is key to maintaining safe, sustainable and attractive places over the long-term.

Crime is more likely to occur where places become untidy, unattractive and show ongoing evidence of neglect, such as broken windows, abandoned vehicles or persistent graffiti.

While high standards of maintenance will encourage active use and enjoyment of the area by local residents, poor maintenance leads to a vicious circle of neglect, environmental degradation and reduced usage.

Developers should consider management and maintenance issues following best practice guidelines from the earliest stages of project planning.

Where appropriate, developers should demonstrate to the Council, at the earliest stages of project planning, that adequate provision has been made to ensure the long-term maintenance of buildings, car parks, footpaths, cycle ways, public spaces, landscaped areas and lighting to ensure that crime reduction measures, environmental quality and amenity benefits are safe-guarded for future generations.

Long term site management and maintenance should be sufficiently robust to cope with changing situations to respond to unforeseen situations or new crime reduction opportunities.





SUFFOLK CONSTABULARY

NOT PROTECTIVELY MARKED

Police Station, Old Nelson Street, Lowestoft NR321PE
Telephone: 101 or 999 in an emergency Fax: 01473 613737 (24 hrs)
Calls may be monitored for quality control, security and training purposes.

Direct Dial:01986 835276
Date 07/05/19

Dear Sirs

REF: DC/19/02090 - Land Off, Dublin Road, Rishangles, Suffolk

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

I attach a copy of the document ***Designing Out Crime in Suffolk, Residential Developments***, which has been produced to help developers and designers determine the appropriate aspects of design that will help to reduce the opportunity for crime to occur within new developments. It has been proven that effective design will deter criminal and anti-social behaviour and will help create a sense of ownership and responsibility for new developments.

https://www.suffolk.police.uk/sites/suffolk/files/residentialdesignguide_low.pdf

I have also copied this letter and the attachment to the developer, Gladman, in order that they can consider these recommendations.

I would be pleased to work with the developer at the detailed design stage and would invite them to contact me should the development progress to this stage.

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

I also strongly recommend that an application for Secured by Design (SBD) approval is made for this development.

Officers and committee members are asked to consider the requirements of the following legislation relative to designing out crime when making a decision regarding this application.

The following legislation is relevant.

Making Suffolk a safer place to live, work, travel and invest

www.suffolk.police.uk

Section 17 of the 'Crime and Disorder Act 1998'

This part of the CDA places a duty on each local authority: 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'.

National Planning Policy Framework.

National Planning Policy Framework:

Paragraph 91b.

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.

Paragraph 127(f).

Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Developers can apply for National Building Approval membership from Secure by Design (SBD), where members agree to adopt Secure Design principles and can market properties as being Secure By Design approved at the start of building, rather than at the final stages of completion. Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

Further information on SBD can be found at www.securedbydesign.com

Alan Keely
Designing Out Crime Officer
Suffolk Police
Eastern Area

From: Paul Harrison <Paul.Harrison@babberghmidsuffolk.gov.uk>
Sent: 08 May 2019 09:46
To: Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: DC 19 02090 Thurston

Vincent
Heritage does not wish to offer comment on this proposal.
Please treat this email as the Heritage consultation response.
Paul

Paul Harrison
Heritage and Design Officer
T 01449 724677 | 07798 781360
E paul.harrison@babberghmidsuffolk.gov.uk
E heritage@babberghmidsuffolk.gov.uk
W www.babergh.gov.uk | www.midsuffolk.gov.uk



Click here
to tell us what you think
of our draft
Communities Strategy.
Our consultation
will close at 12pm
on 1 March 2019



From: David Pizzey <David.Pizzey@babberghmidsuffolk.gov.uk>
Sent: 07 May 2019 13:51
To: Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>
Subject: DC/19/02090 Land Off, Dublin Road, Rishangles

Hi Vincent

I have no objection in principle to this application as the existing land use means conflict between the development and any significant trees/hedges on site should be avoided. Although a small number of trees are likely to require removal none are of sufficient importance to warrant being a constraint and their loss will not result in an adverse impact upon the wider landscape. The accompanying Tree Survey provides an accurate appraisal of existing trees although a detailed Arboricultural Impact Assessment will be required to identify specific losses and areas requiring precautionary measures and/or mitigation. This should be provided at full application stage or when a final layout design is available.

If you are minded to recommend approval we will also require a detailed Arboricultural Method Statement and Tree Protection Plan in order to help ensure the retained trees are safeguarded effectively. This information can be dealt with as part of reserved matters/under condition.

Please let me know if you require any further input.

Regards

David

David Pizzey FArborA
Arboricultural Officer
Tel: 01449 724555
david.pizzey@babberghmidsuffolk.gov.uk
www.babbergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils – Working Together

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

From: planning@babberghmidsuffolk.gov.uk <planning@babberghmidsuffolk.gov.uk>
Sent: 02 May 2019 12:55
To: David Pizzey <David.Pizzey@babberghmidsuffolk.gov.uk>
Subject: MSDC Planning Consultation Request - DC/19/02090

Please find attached planning consultation request letter relating to planning application - DC/19/02090 - Land Off, Dublin Road, Rishangles, Suffolk

Kind Regards

Planning Support Team

From: BMSDC Public Realm Consultation Mailbox <consultpublicrealm@baberghmidsuffolk.gov.uk>

Sent: 09 May 2019 14:59

To: BMSDC Planning Mailbox <planning@baberghmidsuffolk.gov.uk>

Subject: RE: MSDC Planning Re-consultation Request - DC/19/02090

Hello Planning Support

The Public Realm Officers have discussed the outline planning permission for land off Ixworth Road, Thurston and make the following observations.

The inclusion of a Neighbourhood Play Area within this development is welcomed. It is noted that other proposed developments surrounding this application site do not contain play areas and Officers believe it is essential that a play area is included in one of the other developments should this one not gain planning permission. There is a risk that no play provision may be provided if this development fails.

In consultation with the community in Thurston it was expressed that the provision of space for a skate park was required. A location to the north of the high school was identified as being the most suitable location. Whilst outside the boundary of this application, officers would like to see consideration given to the provision of a skate park somewhere within the developments around Thurston High School

Regards

Dave Hughes

Countryside and Public Realm

Babergh & Mid Suffolk District Councils – Working Together

Tel 01449 724639

Mob 07990 542090

Email: david.hughes@baberghmidsuffolk.gov.uk

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



22 May 2019

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

By email only

Dear Vincent,

Thank you for requesting advice on this application 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/19/02090
Location: Land To The East Of Ixworth Road Thurston Suffolk
Proposal: Outline Planning Application (some matters reserved)- Erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space(s), children's play area and sustainable drainage system (SuDS), to include 35% affordable dwellings.

Thank you for consulting Place Services on the above application.

Holding objection due to insufficient ecological information

Summary

We have reviewed the Preliminary Ecological Appraisal (CSA Environmental, April 2019) provided by the applicant, relating to the likely impacts of development on designated sites, Protected & Priority species/habitats.

We are not satisfied that sufficient ecological information is currently available for determination of this application.

This is primarily because the Preliminary Ecological Appraisal has indicated that the following surveys results are still required:

- Bat activity surveys – May to August
- Hazel Dormouse presence/likely absence surveys – May to September.
- Great Crested Newt eDNA survey – Awaiting results.



In addition, we note that the Preliminary Ecological Appraisal indicates the presence of Skylark during the walk over survey. Consequently, a Breeding Bird Survey, which follows the BTO Common Bird Census, should also be provided for this application, prior to determination. This is necessary to inform the potential impact of the development to Priority Farmland Birds species, particularly Skylark.

The Breeding Bird Survey will inform a Skylark Mitigation Strategy which can be secured at reserved matters stage. Mitigation for Skylarks will consist of the provision of Skylark plots (two per every Skylark territory) to be secured on appropriate offsite agricultural land for a minimum period of 10 years. If the nearby agricultural land is situated in the applicants control then measures can be secured as a condition of any consent. However, if this is not possible then the mitigation must be secured by legal agreement.

In addition, it is highlighted that any Skylark Mitigation Strategy will also need to contain the following content:

- a) Purpose and conservation objectives for the proposed Skylark nest plots;
- b) detailed methodology for the Skylark nest plots following Agri-Environment Scheme option: 'AB4 Skylark Plots';
- c) locations of the Skylark plots by appropriate maps and/or plans;
- d) persons responsible for implementing the compensation measure.

Therefore, further information is still required to provide the LPA with certainty of impacts on legally protected species and enable it to demonstrate compliance with its statutory duties, including its biodiversity duty under s40 NERC Act 2006.

We look forward to working with the LPA and the applicant to provide the additional information to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

Hamish Jackson GradCIEEM BSc (Hons)
Junior 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.

Consultation Response Pro forma

1	Application Number	DC/19/02090	
2	Date of Response	21/05/19	
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.	Ensure that the development is suitable for a 32 tonne Refuse Collection Vehicle (RCV) to manoeuvre around attached are the vehicle specifications.  OLYMPUS - 8x4MS Wide - Euro 6 - Smo The road surface and construction must be suitable for an RCV to drive on. Please identify the bin stores and presentation points for the waste and recycling bins for each property the points must be at the edge of the curtilage.	
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.

From: David Harrold <David.Harrold@babberghmidsuffolk.gov.uk>
Sent: 23 May 2019 10:53
To: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>
Cc: Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>
Subject: Plan ref DC/19/02090 Land East of Ixworth Road, Thurston. EH - Noise/Odour/Light Smoke

Thank you for consulting me on the outline application to erect 210 dwellings.

I note the noise assessment by ANC acoustic consultants dated April 2019. The assessment is reasonable and robust. It confirms the suitability of the land for the purpose proposed and I concur with this.

I do not, therefore, have any adverse comments and no objection to the proposed development.

I would, however, recommend that before work starts on site, the applicant submits for approval an environmental construction management plan. I would suggest the following condition:

Prior to the commencement of development, details of the construction methodology shall be submitted in a construction management plan. Any such plan shall be approved by the planning authority and incorporate the following information:

- a) Details of the hours of work/construction of the development within such operations shall take place at the site.
- b) Details of the storage of construction materials on site, including details of their maximum storage height.
- c) Details of how construction and worker traffic and parking shall be managed to avoid parking on street and conflicts with other road users.
- d) Details of any protection measures for footpaths surrounding the site.
- e) Details of any means of access to the site during construction.
- f) Details of the scheduled timing/phasing of development for the overall construction period.
- g) Details of any wheel washing to be undertaken, management and location it is intended to take place.
- h) Details of the siting of any on site compounds and portaloos.
- i) Details of the method of any demolition to take place, including the recycling and disposal of said materials resulting from demolition.
- j) Details of proposed arrangements for notifying neighbours of the commencement of works and contact details in case of enquiries.

The construction shall be undertaken in accordance with the agreed methodology approved in writing by the Local Planning Authority.

Note: recommended construction hours are 08.00 – 18.00 hours Monday – Friday and 0800 – 13.00 hours Saturdays, with no work to take place on Sundays or Bank Holidays.

Reason - To minimise detriment to nearby residential and general amenity by controlling the construction process to achieve the approved development.

I trust this is of assistance

David Harrold MCIEH
Senior Environmental Health Officer

Planning Application – Consultation Response

Planning Application Reference:	DC/19/02090
Site:	Land To The East Of Ixworth Road Thurston Suffolk
Proposal:	Outline Planning Application (some matters reserved)- Erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space(s), children's play area and sustainable drainage system (SuDS), to include 35% affordable dwellings.
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 LA089. 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 LA089. 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. It is also apparent the site is adjacent and sandwiched between two large sites that already have planning permission. The adopted Neighbourhood Plan identifies key movement routes either side of the application site in question. This proposal would provide a bridged gap between the two large sites with planning permission either side. This would allow the settlement boundary a cleaner settlement line up to the existing Rugby ground to the north of the application site.

It is noted 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 planned 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 LA089. 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/19/03486, Land South West Of Beyton Road, Outline application for 210 dwellings, emerging Joint Local Plan site allocations reference LA087

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 are identified:

- 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 12/11/2019, 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 proposed scheme includes a number of pedestrian and cycle improvements in Thurston:

- A new shared cycleway on the east side of Ixworth Road linking with footways at the junction with Norton Road.
- Tabletop traffic calming at Norton Road/Ixworth Road junction with zebra crossings
- Controlled pedestrian crossing on Barton Road near junction with Heath Road to provide a safe link for pedestrians and for cyclists for the NCR51 to the village.

The above mitigation provides benefits for Thurston however the County Council, as stated in their response of the 07/01/2020, are concerned with the cumulative impact, as this development (210 dwellings) 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. An additional 210 dwellings on the site off Beyton Road (Site LA087) will add to the cumulative traffic impacts on Thurston. The County Council consider that overall, the impact of both developments would place an unacceptable strain on the highway network within Thurston with increased queue lengths, delays and junctions at or approaching their theoretical capacity. Little mitigation is proposed to offset the impact of this development and therefore the impacts are considered to be severe.

However it is understood that the proposed mitigation of the site Land South West of Beyton Road (Site LA087) would mitigate the harm of cumulative impact. As such, the local junction improvements proposed as part of the planning application DC/19/03486 includes mitigation measures for Beyton Road, Pokeridge Corner, Barton Road and Fishwick Corner, these are therefore essential to the safety and sustainability of both development, as well as for the cumulative impact of the growth in the area.

- 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 16/04/2019 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 LA089 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 pedestrian and cycle improvements, however, the cumulative impact of this site together with the 210 dwellings of the Beyton Road (Site LA087) raise concern regarding the potential of severe impact on the highway. It is therefore necessary that the mitigation from the Beyton Road site (DC/19/03486) are secured in a first instance, to then enable the development of this site.

Strategic Planning Policy and Infrastructure
Babergh and Mid Suffolk District Councils

Planning application consultation response

From: Robert Hobbs
To: Vincent Pearce

Date: 23rd May 2019

Application reference: DC/19/02090 - Land to the East of Ixworth Road, Thurston

Application description:

DC/19/02090 - Land to the East of Ixworth Road, Thurston
Outline Planning Application (some matters reserved) – Erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space(s), children's play area and sustainable drainage system (SuDS), to include 35% affordable dwellings.

Planning policy comments:

We raise a holding objection to this planning application as there are infrastructure matters regarding highways and rail that need to be addressed in Thurston and require collaborative working with infrastructure providers.

Consultee Comments for Planning Application DC/19/02090

Application Summary

Application Number: DC/19/02090

Address: Land To The East Of Ixworth Road Thurston Suffolk

Proposal: Outline Planning Application (some matters reserved)- Erection of up to 210 dwellings and new vehicular access to include planting and landscaping, natural and semi-natural green space including community growing space(s), children's play area and sustainable drainage system (SuDS), to include 35% affordable dwellings.

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

I have been working with Thurston Parish Council to ideally plan for appropriate open space and play provision within the village.

The proposed provision of the NEAP there warrant more detailed discussion with TPC to ensure its location and the equipment provided reflects their strategic and priority needs for the village which are mainly for adventure and teenage provision.

However it is noted that this application is outside the scope of the forthcoming Neighbourhood Plan.

From: Chris Ward <Chris.Ward@suffolk.gov.uk>
Sent: 17 May 2019 10:35
To: Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>
Cc: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>; Sam Harvey <Sam.Harvey@suffolk.gov.uk>
Subject: RE: MSDC Planning Re-consultation Request - DC/19/02090

Dear Vincent,

Thank you for consulting me about the proposed residential development at Land East of Ixworth Road in Thurston. I will be providing some comments on the sustainable transport measures and Travel Plan that was submitted as part of the planning application, however they 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

Endeavour House, 8 Russell Road, Ipswich, IP1 2BX

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