

Committee Report

Item No: 7A

Reference: DC/21/04549

Case Officer: Vincent Pearce

Ward: Thurston.

Ward Member/s: Cllr. Austin Davies and Cllr. Harry Richardson.

RECOMMENDATION: GRANT FULL CONDITIONAL PLANNING PERMISSION

Description of Development

Erection of a 54 no. unit extra care Affordable Housing scheme comprising of 40 apartments, 14 bungalows and communal areas with associated car parking and landscaping.

Location

Land South of Heath Road, Thurston.

Expiry Date: 28/02/2022

Application Type: FULL - Full Planning Application

Development Type: Major Small Scale - All Other

Applicant: Housing 21

Agent: Mr Mark Slater

Parish: Thurston

Site Area: 1.3ha

Density of Development:

Gross Density (Total Site): normal density calculation not applicable¹

Net Density (Developed Site, excluding open space and SuDs): normal density calculation not applicable²

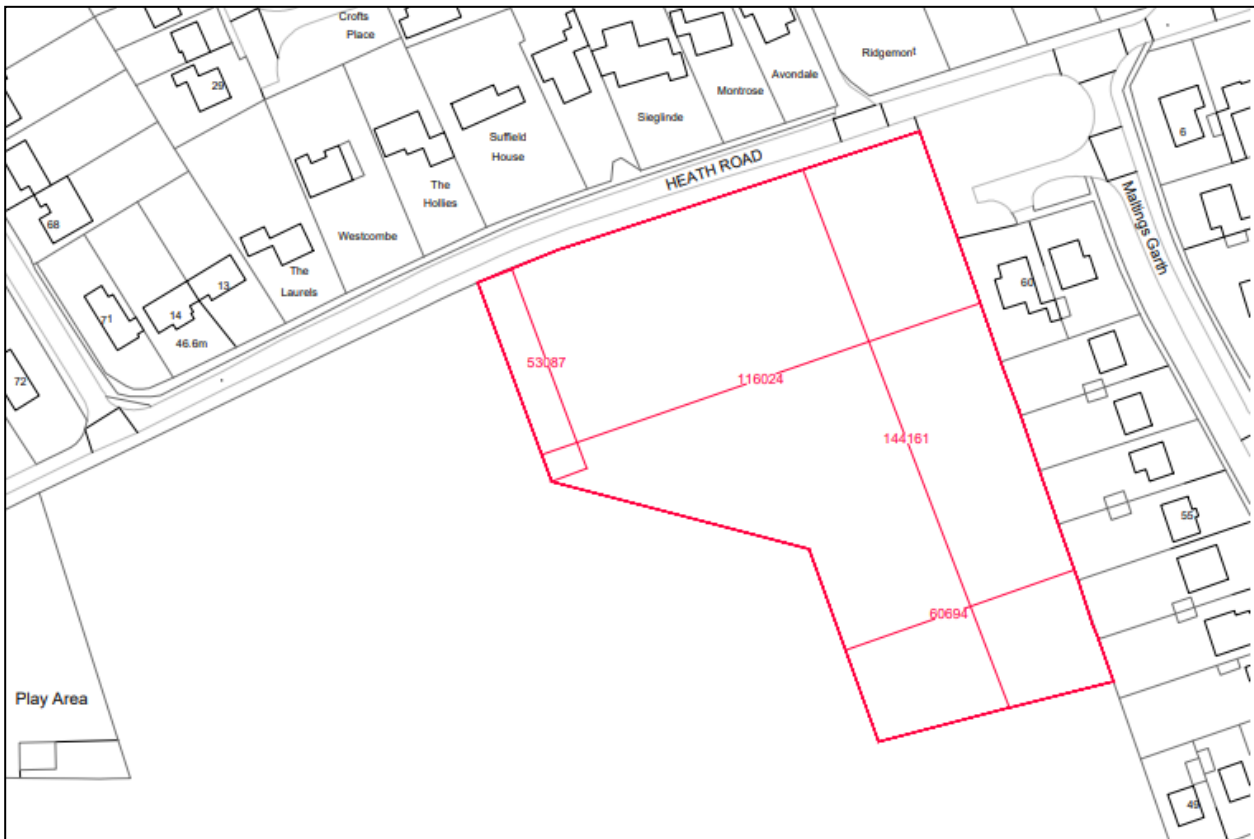
Details of Previous Committee / Resolutions and any member site visit: None

Has a Committee Call In request been received from a Council Member (Appendix 1): No

Has the application been subject to Pre-Application Advice: No

¹ Whilst this application provides residential accommodation it includes an element of care

² ditto



figures 1: **Application site red line** [top] and site in context of Thurston [bottom]

CLASSIFICATION: Official

PART ONE – REASON FOR REFERENCE TO COMMITTEE

The application is referred to committee for the following reasons:

Whilst it is not a purely residential scheme as it contains an element of care it is of size that equates to being beyond the 15 dwelling threshold that limits the Chief Planning Officer's ability to deal with an application through the delegated procedure.

PART TWO – POLICIES AND CONSULTATION SUMMARY

Summary of Policies

Neighbourhood Plan – Thurston Neighbourhood Development Plan 2019 [TNDP19]

Thurston Neighbourhood Development Plan [October 2019] [TNDP19]



figure 2: **Cover of TNDP19**

Neighbourhood Plan Status

Thurston has a 'Made' and Adopted Neighbourhood Development Plan – October 2019.

The Thurston Neighbourhood Plan attracts full weight as a material planning consideration.

It forms parts of the Council's Adopted Development Plan.

It is considered to be an 'up to date' expression of the Council's planning policy and represents the most up to date planning policy for the locality.

Particular regard is given in this report to the following policies in the TNDP19.

Policy 1: Thurston Spatial Strategy

Policy 2: Meeting Thurston's Specialist Care Needs

Policy 4: Retaining and Enhancing Thurston's Character Through Residential Design

Policy 5: Community Facilities

Policy 6: Key Movement Routes

Policy 7: Highway Capacity at Key Road Junctions

Policy 8: Parking Provision

Policy 9: Landscaping and Environmental Features

Policy 11: Provision for Wildlife in New Development

Policy 12: Minimising Light Pollution

The site is outside of the defined settlement boundary for Thurston in the TNDP19

Adopted Core Strategy [September 2008] [CS2008]

CS1: Settlement Hierarchy

Thurston is defined as a Key Service Centre [CS1] where:

"The majority of new development (including retail, employment and housing allocations) will be directed to towns and key service centres...."

CS2: Development in the Countryside and countryside villages

Although adjacent to the defined settlement boundary for Thurston, the application site is outside of the defined settlement boundary. It is therefore considered to be located in the countryside where development is more strictly controlled. It will be recommended in this report that despite this Members can give greater weight to TNDP19 Policy 3: Meeting Specialist Care Needs, which does enable care facilities outside of the settlement boundary in certain circumstances.

CS3: Reduce contributions to climate change

This report will demonstrate that the proposal includes suitable measures

CS4: Adapting to climate change

This report will demonstrate that the proposal includes suitable measures

CS5: Mid Suffolk's Environment

The proposed development is not considered to harm the local environment for reasons that will be explored in this report. The development is considered to be sustainable under all three golden threads of the NPPF21. [Environmental Economic and Social] [NPPF21 paragraph 8]

CS6: Services and infrastructure

The proposal is not considered to generate the requirement for mitigation under S106 of the Town Country Planning Act 1990. Such mitigation as may be required may be eligible for funding via a CIL bid.

Adopted Core Strategy Focused Review [December 2012]

Policy FC1 Presumption in favour of sustainable development

This development is sustainable and officers will advise the Committee that it is their opinion that it falls within Paragraph 11 c of the NPPF21 meaning the *'decision-taker' 'approving the development proposal without delay.'*

Policy FC1.1 Mid Suffolk approach to delivering sustainable development

The development is considered consistent

Adopted Local Plan [1998]

SB2 Development appropriate to its setting

This is low level development that will be well landscaped. It is accepted that no site within the settlement boundary is immediately available for a development of this size and nature. If it is to be located in Thurston it will of necessity require a site outside of the settlement boundary. This will inevitably mean a change of character to some degree. The campus style development will have its own character but will include positive design elements and themes. TNDP19 Policy 4: Retaining and Enhancing Thurston Character Through Residential Design [particularly but not exclusively parts A, B c/f/g].

SB3 Retaining visually important open spaces

This site is not within an area of special landscape or environmental designation and the site is not identified in the TNDP19 Policy 10: Local Green Spaces

GP1 Design and layout of development

Officers believe this a well-designed, attractive, supportive and accessible development

GP3 Taking account of people with disabilities

This is a central design theme within the proposal

CL8 Protecting wildlife habitats

The proposed development will enhance biodiversity on the site whilst retaining existing flora at the margins as will be described in this report. Not only does the development conform to CL8 but also addresses the requirements of TNDP19 Policy 11: Provision for Wildlife in New Development. Protection in terms of minimising light pollution will be secured by recommended condition *[if members are minded to grant planning permission]*. In this way the development will address the requirements of TNDP19: Minimising Light Pollution.

CL11 Retaining high quality agricultural land

The site is classified as Grade 3 agricultural land [moderate to good]. It is therefore not the best quality [grade 2 – very good , grade 1-excellent] but may still be BMV land because that includes Grade 3a. That said members will wish to consider the impact of the loss of this site to potential agricultural when considering the overall merits of the proposal. Taking a strategic view, the loss of approx. 1.3ha of possibly grade 3a agricultural land does not prejudice farming activity in the District and the remainder of the site can continue in agricultural activity if that is the owners [or an agricultural tenant's] desire. It is officers opinion that this aspect of the proposal is not determinative.

H7 Restricting housing development unrelated to the needs of the countryside

The proposal does not represent standard residential development but is specialist accommodation designed to provide for care needs. Officers are of the opinion that the development is consistent with TNDP19 Policy 3: Meeting Specialist Care Needs.

H14 A range of house types to meet different needs

This development will deliver much needed extra care accommodation that will be able to respond to the specialist needs of older people. [TNDP19 Policy 2 Meeting Thurston's Housing Needs]. The delivery of such a facility is considered welcomed at a time where the care needs of a growing older population. The centre will be able to accommodate residents in need of dementia care and support.

T9 Parking standards

The proposal meets the Council's Adopted Parking standards and TNDP19 Policy 8: Parking Provision subject to enhanced electric vehicle charging under TNDP19 Policy 4 C: Retaining and Enhancing Thurston Character Through Residential Design

T10 Highway considerations in development

The proposal raises no objection from Suffolk County Council as local highway authority from a highway safety or capacity point of view and neither has Thurston Parish Council. The Parish Council's support [with provisos unrelated to highway safety and capacity within the village] suggests that there is not considered to be a conflict with TNDP19 Policy 6: Key Movement Routes, Policy 7 and Highway Capacity at Key Road Junctions.

T11 Facilities for pedestrians and cyclists

Cycle parking spaces are being provided in line with adopted standards and the proposal includes a footway extension to link the site with a nearby bus stop. [³a condition is recommended to secure this improvement]

T12 Designing for people with disabilities

The proposal has been carefully planned to suit although a need for disabled parking spaces for people with a disability [staff/visitors] has been noted and this can be addressed by the suggested within the recommendation.

SC10 Siting of local community health services

Whilst the proposal is not strictly a local community health service it certainly fits within the spirit of policy SC10 in that whilst it is not a publicly provided and run facility it will help to address a national and local shortage for such healthcare related accommodation and support.

Draft Babergh Mid Suffolk Joint Local Plan 2021 [JLP21]

Following the exploratory meeting with the inspectors on Thursday 16 December 2021, it is proposed to progress the current Joint Local Plan (JLP) as a 'Part 1' local plan. This will be followed by the preparation and adoption of a 'Part 2' local plan as soon as possible.

The Local Development Scheme is currently being updated to reflect this, and this will provide details of what each plan will cover, and the timetable for their production. In the meantime, the letter from the inspectors gives details on the areas each plan will be likely to include.

The Councils are currently working with our consultants and project partners to scope and progress the outstanding matters raised by the inspectors during the examination so far, and the

³ such a condition would read "Prior to the occupation of any part of the development a footway as shown on drawing [add reference] shall be provided to the satisfaction of SCC as local highway authority and be available for use and thereafter retained in perpetuity..."

necessary main modifications. Further details of this work and timescales - including consultation periods - will be provided on our website in due course.

Presently the JLP21 attracts little weight as a material planning consideration such that it plays no determinative role in this case, and this report therefore reflects that position.

The National Planning Policy Framework 2021

Suffolk Guidance for Parking: Third Edition May 2019

Consultations and Representations

During the course of the application Consultation and Representations from third parties have been received. These are summarised below.

A: Summary of Consultations

Parish Council (Appendix 3)

- **Thurston Parish Council [17 December 2021] supports** the principle of this development subject with provisos. Their consultation response in full reads:

“Having reviewed the further documentation submitted for this application, the Parish Council would like to state that overall it continues with its support of this application and is of the opinion that this proposal will help address Objective H2 - "To address the specific housing needs of older people". However, in the anticipation that this proposal creates an opportunity to set the highest standards of design for the whole site and tackle some of the global climate issues at a local level, the Council is concerned that Points 8 and 9 of its submission dated 23rd September 2021 have not been addressed (repeated below for clarity):

Point 8: The parish council is concerned that there are only two communal electric vehicle charging point for the residents and staff plus visitors. and would like to request that the applicant takes into consideration the fact that the number of electric charges in use will increase significantly over the coming years. Reference should be made to the draft Suffolk County Council Climate Action Plan. Point 9: The applicant should also be encouraged to ensure that the location for the electric charging facility is most practical and will meet the needs of different users including occupants, visitors and people with disabilities. Further consideration should also be given as to how additional facilities can be accommodated in a variety of ways, in terms of location, allocation and design.

Following the consultation by the government in July-October 2019, a number of proposals were consulted upon and new measures are to be introduced which will mandate charge point infrastructure into new homes. The Parish Council would like to request that the proposal is conditioned following the guidelines set out for residential

buildings undergoing major renovation ensuring that where there are to be more than 10 parking spaces within the site, there is to be at least one electric vehicle charging point for each dwelling with associated parking within the site boundary and cable routes in all spaces without charge points. Point 9 also needs to be considered and addressed in terms of location ensuring that the needs of all users are fully met in terms of accessibility.”

Officer comment:

The support of Thurston Parish Council is noted as are the provisos. This report will fully consider the matters raised along with relevant Adopted Thurston Neighbourhood Development Plan 2019 [TNDP19] policies within its Assessment section.

Members will of course be aware of the growing need for extra care accommodation with the nationally growing elderly population and the fact that people are tending to live longer lives. This often brings its own health issues⁴. Mid Suffolk is no different.

National Consultee (Appendix 4)

- **NHS ~ West Suffolk Clinical Commissioning Group [CCG] [14 December 2021]: raises a conditional no objection.** Extracts:

“This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at Mount Farm Surgery, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.”

West Suffolk CCG would not wish to raise an objection to the proposed development.

9. West Suffolk CCG is satisfied that the basis of a request for CIL contributions is consistent with the Position Statement list produced by Babergh and Mid Suffolk District Councils West Suffolk CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response....”

⁴ “Dementia is a growing challenge. As the population ages and people live for longer, it has become one of the most important health and care issues facing the world. In England it is estimated that around 676,000 people have dementia. In the whole of the UK, the number of people with dementia is estimated at 850,000.

Dementia mainly affects older people, and after the age of 65, the likelihood of developing dementia roughly doubles every five years. However, for some dementia can develop earlier, presenting different issues for the person affected, their carer and their family.

There are around 540,000 carers of people with dementia in England. It is estimated that one in three people will care for a person with dementia in their lifetime. Half of them are employed and it’s thought that some 66,000 people have already cut their working hours to care for a family member, whilst 50,000 people have left work altogether.” NHS

<https://www.england.nhs.uk/mental-health/dementia/>

West Suffolk CCG notes:

“ ... The proposal comprises a development of up to 54 extra care 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. The CCG would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application 3.

There are no GP practices within a 2km radius of the proposed development, there is one GP practice closest to the proposed development and this is within circa 6km. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact”.

Officer comment:

In the event of planning permission being granted and that permission being implemented West Suffolk CCG will be able to make a bid to BMSDC for CIL funding and that will be assessed on its merits in the normal way.

- **Historic England [23 August 2021]**

They advise that it is not necessary to consult them

- **Highways England [30 November 2021]**

No objection

- **Sport England [30 November 2021]**

“The proposed development does not fall within either our statutory or non-statutory remit”

- **Environment Agency [22 September 2022]**

“We have no comments on this application”

- **Natural England [27 August 2021]**

“Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.”

County Council Responses (Appendix 5)

- **Suffolk County Council, Highways:**

“...we are satisfied with the proposal, subject to ... planning conditions:”

- **Suffolk County Council, Floods and Water [LLFA & SuDS]:**

Additional consultation with the LLFA is at the time of writing this report underway and so a verbal update will be provided at the meeting or in associated tabled papers. Currently there is a holding objection with a request for additional detail. That additional information has been supplied. IF the information satisfies the LLFA then it is likely that the holding objection will be lifted and conditions recommended. Members will be updated at Committee.

- **Suffolk County Council, Developer Contributions: [8 September 2021]**

No S106 requirements

- **Suffolk County Council, Fire and Rescue:**

“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), 2019 Edition, 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, 2019 Edition.

Water Supplies

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible, at this time, to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies./continued OFFICIAL We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process. OFFICIAL

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 or appointed Approved Inspector in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.”

▪ **Suffolk County Council, Archaeology: [20 August 2021]**

“This site lies in an area of archaeological potential recorded on the County Historic Environment Record (HER), in close proximity to a section of Roman road (HER ref nos. THS 002, THS 007 & SUF 098) and finds spots dating from the Late Iron Age (THS 004) and Roman period (THS 002). Archaeological investigations north of the site have identified Neolithic pits (THS 011 & THS 030) and ditches associated with the Roman road (THS 030). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate: 1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority. The scheme of investigation shall include an assessment of significance and research questions; and:

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

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local

Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2021)."

Internal Consultee Responses (Appendix 6)

▪ Heritage: [7 September 2022]

"The site lies adjacent to existing residential development on two sides and will appear entirely within the context of this existing development. There do not appear to be any heritage assets whose setting would potentially be affected by the proposal. Accordingly I do not consider the proposal would result in any harm to any heritage assets."

▪ Strategic Housing [3 September 2021]

"2. Housing Need Information:

2.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2019, confirms a continuing need for housing across all tenures and a growing need for affordable housing.

2.2 The SHMA indicates that in Mid Suffolk there is a need for 127 new affordable homes per annum. The Council's Choice Based Lettings system has 10 applicants registered for affordable housing, who are seeking accommodation in Thurston as at the end of August 2021, 2 of whom are aged over 55 and 1 requires an adapted property¹. This figure increases to 203 applicants aged over 55, of whom 91 require an adapted property, in terms of the number of applicants on the register currently seeking accommodation somewhere in Mid Suffolk.

2.3 The SHMA also indicates a need for 1,005 additional specialist housing units in Mid Suffolk, of different types, between 2014 and 2036². This development could make a contribution to meeting this need. Given the range of different facilities and levels of support which different specialist housing schemes provide, it is difficult to pigeonhole individual proposals, and the labels used for different types of housing can be overlapping, contradictory and/or confusing.

2.4 The application documents describe this proposal as being 'Extra Care', and it appears that this proposal would fit somewhere between what the SHMA would categorise as 'Enhance Sheltered Housing' and 'Extracare Housing',

based on the definitions on provided in the footnotes of page 92. The SHMA sets out a need for 249 units of these types of housing, so this development meets a significant proportion of Mid Suffolk’s need.

2.5 Schemes such as these – affordable Extra Care Housing schemes which include features for supporting people with dementia – are understood to be a priority for the County Council.

2.6 The Thurston Neighbourhood Plan is supportive of the principle of specialist housing for older people. The NDP was supported with a survey of housing needs, carried out in 2017, which identified specialist housing and bungalows as a priority housing need locally.

2.7 This development could help enable downsizing by local residents. It is worth noting that the 2011 Census calculated that under-occupation levels in both Thurston (85.1%) and Mid Suffolk (80.6%) are significantly higher than England as a whole (68.7%), suggesting a demand for downsizing. There are wider housing market and economic benefits to enabling downsizing by older households.

2.8 With the ageing population, it can be expected that this development would contribute to meeting overall needs for housing for older people, but further analysis of the development is set out below.

3. Affordable Housing

3.1 The development is intended to bring forward 54 affordable units; a mix of social rent (56%) and shared ownership (44%). The tenure split / mix, and unit floorspaces, are as follows. Please note that this information has been sought from the Agent and it has not been specified within the application documents.

Tenure	Number	Description	Gross Internal Floor Areas (m²)
Social Rent	26	1-bed Flat	53.0 - 58.7 (54.5 average)
	2	2-bed Flat	66.1 - 68.5 (67.3 average)
	2	2-bed Bungalow	65.9 - 67.4 (66.5 average)
Older Person’s Shared Ownership	2	1-bed Flat	53.0 - 58.7 (54.5 average)
	10	2-bed Flat	66.1 - 68.5 (67.3 average)
	12	2-bed Bungalow	65.9 - 67.4 (66.5 average)

3.2 Whilst the SHMA does not estimate a requirement for affordable specialist housing units, the evidence provided in this memo (above) indicates that there is a current demand for affordable housing with adaptations.

3.3 It is understood that the applicant intends to allocate units in line with the usual approach for Extra Care facilities, through a panel made up from representatives from Suffolk County Council, Mid Suffolk District Council and Housing 21.

3.4 All units meet and exceed the overall Gross Internal Floor Areas required for the Nationally Described Space Standards. Further information regarding the design of these units is set out below.

4. Design

4.1 As a development aimed at the over 55s, which includes care services, the way in which the design reflects the needs of an aging population is particularly pertinent.

4.2 Whilst not currently a planning policy requirement, the design is understood to meet the requirements of Part M4(2) of the Building Regulations. This does not appear to be specified in the application documents, but the applicant has indicated that this is the case. If it needs to be confirmed, colleagues from the Council's Building Control team may be able to advise.

4.3 Part M4(2) is a set of design requirements for residential development which is intended to support residents as their mobility changes, for example with:

- Low level windows and window handles, services and switches at specified heights.
- Bathrooms walls to be strong enough to support grab rails
- Bedrooms and bathrooms of a size and layout to support provision of care with 'access zones' around beds.

M4(2) represents the Government's codification of the Lifetime Homes Standard into the Building Regulations, through the 2015 Housing Standards Review. The M4(2) standard is not specifically designed for people in wheelchairs, but should still make it easier for those with reduced mobility to occupy these dwellings.

4.4 The Design and Access Statement notes, on page 4 of part 4, that 'the design uses HAPPI principles', meaning the recommendations made by the All Party Parliamentary Group on Housing Our Ageing Population in 2009.³ The 'made' Thurston Neighbourhood Plan also references HAPPI as a set of important criteria for older people's housing (albeit without setting it in policy). It may be appropriate to thoroughly examine the design, with reference to these principles, as a way of determining the suitability and quality of the design.

4.5 Reference is also made to design measures which could support those with dementia, for example legible layouts with wayfinding elements. There are also principles which can be used to assess the suitability of design of residential development the public realm in respect of supporting those with dementia; with research from Stirling University and the Royal Town Planning Institute.

4.6 The provision of on-site facilities, including internal and external social areas, and guest accommodation, is welcomed."

- **Arboricultural Officer [26 August 2021]**

“I have no objection to this application subject to it being undertaken in accordance with the measures outlined in the **accompanying arboricultural report**, an appropriate **condition** should be used for this purpose. No trees are proposed for removal and all appear to have been given adequate space within the layout design”.

- **Environmental Health, Air Quality [7 December 2022]**

“No objections”

- **Environmental Health, Land Contamination [2 December 2022]**

“no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contaminationand-the-planning-system/>.”

- **Environmental Health, Pollution [29 November 2022]**

“No observations or comments to make”

- **Environmental Health, Sustainability [27 August 2021]**

“I note the contents therein and welcome the Applicant’s recognition of the Climate Emergency and the sustainability requirements that are needed as a result. The fabric first approach, higher than Building Regulations air tightness, minimal thermal bridging, use of MVHR systems and other water and resource efficiency measures are good practice.

However I would suggest that the provision of one electric vehicle charging point per five parking spaces will be insufficient for future needs considering the sale of new fossil fuelled cars and vans will be prohibited in the UK from 2030.

Babergh and Mid Suffolk Councils declared a Climate Emergency in 2019 and have an aspiration to be Carbon Neutral by 2030, this will include encouraging activities, developments and organisations in the district to adopt a similar policy. This council is keen to encourage consideration of sustainability issues at an early stage so that the most environmentally friendly buildings are constructed and the inclusion of sustainable

techniques, materials, technology etc can be incorporated into the scheme without compromising the overall viability, taking into account the requirements to mitigate and adapt to future climate change.

I have no objections however if the planning department decided to permit and set conditions on the application, I would recommend the following.

Prior to the commencement of development a scheme for the provision and implementation of water, energy and resource efficiency measures, during the construction and operational phases of the development shall be submitted to and approved, in writing, by the Local Planning Authority. The scheme shall include a clear timetable for the implementation of the measures in relation to the construction and occupancy of the development. The scheme shall be constructed and the measures provided and made available for use in accordance with such timetable as may be agreed.

A Sustainability & Energy Strategy must be provided detailing how the development will minimise the environmental impact during construction and occupation (as per policy CS3, and NPPF) including details on environmentally friendly materials, construction techniques minimisation of carbon emissions and running costs and reduced use of potable water (suggested maximum of 105ltr per person per day).

The document should clearly set out the unqualified commitments the applicant is willing to undertake on the topics of energy and water conservation, CO2 reduction, resource conservation, use of sustainable materials and provision for electric vehicles.

Details as to the provision for electric vehicles should also be included please see the Suffolk Guidance for Parking, published on the SCC website on the link below: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-developmentadvice/parking-guidance/> Guidance can be found at the following locations: <https://www.midsuffolk.gov.uk/environment/environmentalmanagement/planningrequirements/>

Reason – To enhance the sustainability of the development through better use of water, energy and resources. This condition is required to be agreed prior to the commencement of any development as any construction process, including site preparation, has the potential to include energy and resource efficiency measures that may improve or reduce harm to the environment and result in wider public benefit in accordance with the NPPF.”

▪ **Landscape [Place Services] [17 December 2021]**

“The site is outside of the settlement boundary of Thurston which would be considered development in the countryside and would be subject to Policy CL1 of the Adopted Mid Suffolk Local Plan, CS2 of the Mid Suffolk Core Strategy and SP03 of the emerging Joint Local Plan. While we accept the proposals have retained existing and proposed new planting in an effort to screen the development there will still be a significant and permanent

change in the character of landscape. In terms of mitigating landscape and visual effects the use of vegetative screening should only be used if all other considerations, such as alignment and mass of buildings, have been fully exhausted to reduce potential adverse effects. Any design considerations which have been made to reduce the level of harm should be clearly evidenced and only then should the landscape scheme be used to remove or reduce any residual effects.

A Landscape and Visual Appraisal (LVA) should form part of the design process. It is a tool when working through the design of the layout for development and should also be used as a test at the end of the process to ensure the impacts have been considered and where possible removed or reduced.

Therefore, we are still of the opinion that a Landscape and Visual Appraisal (LVA) should be undertaken by a suitably qualified landscape professional and submitted prior to determination. This should not be confused with an LVIA which could be considered disproportionately onerous and expensive.

The Landscape and Visual Appraisal (LVA) should follow the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3) should include: - Context and character appraisal - Landscape constraints and opportunities - Analysis of visual impact from a number of viewpoint locations and key receptors - Mitigation proposals and recommendations Place Services is a traded service of Essex County Council

Secondly, the LVA would highlight opportunities to better integrate the development with its surrounding, such as pedestrian links to the village and also any potential desirable views out onto the countryside for the enjoyment of residents. The current layout and screening could serve to segregate the development and create a perceived barrier which would inhibit integration with the surrounding community and landscape."

▪ **Ecology [Place Services] [18 October 2021]**

"No objection subject to securing ecological mitigation and enhancement measures

Summary

We have reviewed the Report on the Scoping Survey for the Ecological Assessment Report (Huckle Ecology, July 2021), supplied by the applicant, relating to the likely impacts of development on designated sites, protected and Priority species & habitats. We are satisfied that there is sufficient ecological information available for determination.

This provides certainty for the LPA of the likely impacts on designated sites, Protected and Priority Species & Habitats and, with appropriate mitigation measures secured, the development can be made acceptable.

The mitigation measures identified in Report on Ecological Assessment Report (Huckle Ecology, July 2021) should be secured and implemented in full. This is necessary to conserve Protected and Priority Species.

We also recommend that a Wildlife Friendly Lighting Strategy is implemented for this application. Therefore, technical specification should be submitted prior to occupation, which demonstrates measures to avoid lighting impacts to foraging / commuting bats, which are likely present within the local area. This should summarise the following measures will be implemented:

- Light levels should be as low as possible as required to fulfil the lighting need.
- Warm White lights should be used at <3000k. This is necessary as lighting which emit an ultraviolet component or that have a blue spectral content have a high attraction effects on insects. This may lead in a reduction in prey availability for some light sensitive bat species.
- The provision of motion sensors or timers to avoid the amount of 'lit-time' of the proposed lighting.
- Lights should be designed to prevent horizontal spill e.g. cowls, hoods, reflector skirts or shields.

In addition, we support the proposed reasonable biodiversity enhancements, which have been recommended to secure bespoke biodiversity net gains for protected and priority species. The reasonable biodiversity enhancement measures should be outlined within a Biodiversity Enhancement Strategy. The strategy should be secured prior to commencement as a condition of any consent.

However, to ensure that measurable biodiversity net gains will be achieved for this development, in line with paragraphs 174[d] and 180[d] of the NPPF 2021, we encourage the developer to provide a Biodiversity Net Gain Assessment using the DEFRA Biodiversity Metric 3.0 (or any successor). The Biodiversity Net Gain Assessment should preferably follow the Biodiversity Net Gain Report & Audit Templates (CIEEM, 2021)¹. The Biodiversity Net Gain Report should then inform the finalised soft landscaping scheme / Landscape Ecological Management Plan for this application.

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

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

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

▪ **Waste Services [31 September 2021]**

“No objection subject to **conditions**”

Others [Appendix 7]

▪ **Anglian Water [2 September 2021] extracts**

“The foul drainage from this development is in the catchment of Thurston Water Recycling Centre that will have available capacity for these flows

The sewerage system at present has available capacity for these flows

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”

▪ **East Suffolk Drainage Board [19 August 2021]**

“the site in question lies outside the Internal Drainage Districts of the East Suffolk Internal Drainage Board and the Waveney, Lower Yare and Lothingland Internal Drainage Board as well as both Board's wider watershed catchments, therefore the Board has no comments to make.”

▪ **Suffolk Wildlife Trust [7 September 2022]**

“There are records of Hedgehog, a UK and Suffolk Priority Species, in the surrounding area. To maintain connectivity for this species, we recommend maintaining hedgehog permeable boundaries (with gaps of 13x13cm at ground level) as part of this development.

We recommend that integral swift nest bricks should be incorporated into buildings that are of minimum two storeys. The incorporation of swift nest bricks is an established way to enhance biodiversity within a development and provide net gain. Therefore, we request that this is done to provide enhancement to this Suffolk Priority Species, whose numbers have seen a dramatic decline in recent years.”

▪ **West Suffolk District Council [8 September 2021 & 6 December 2021]**

“..has no comment to make”

Representations follow.....

B: Representations

At the time of writing this report at least 12 letters/emails/online comments have been received. It is the officer opinion that this represents 6 objections and 3 expressions of support and 1 neutral response. A verbal update shall be provided as necessary.

Views are summarised below:-

Objection: these include

- Too much green space/farmland being lost in Thurston to development.
- If approved rest of wider site [outside of application site] should be planted up,
- why wasn't this development included in new residential developments in North Thurston?
- Poor design
- Too high
- Out of keeping with character
- Dominating and overbearing
- Health & safety issues
- Inadequate access
- Increased traffic
- Noise
- Ecological impacts
- Boundary issues
- Building work
- Increased pollution
- Adverse landscape impacts
- Loss of open space
- Strain on existing facilities
- Trees
- Loss of privacy
- Council consultation not wide enough
- Heath road too narrow
- Pedestrian safety
- Barton Road junction unsafe and has standing water
- Creation of rush hours
- Development here will open the gates for more in this vicinity
- Heath road should be improved
- Scale
- Application lacking information

Support: includes

- Complies with TNDP19 and meeting care needs
- Will address needs of older people
- Massive benefit to the community

- Appropriate form of development suited to Heath Road
- No environmental harm
- Field was donated for benefit of the village, this achieves that
- A much needed facility
- Applicant consulted widely

Neutral:

No objection to having a development catering for older people but developer could do better

PLANNING HISTORY

REF: DC/21/04549

Planning Application. Erection of a 54no unit extra care Affordable Housing scheme comprising of 40 apartments, 14 bungalows and communal areas with associated car parking and landscaping.

DECISION:
CURRENT APPLICATION

This part of the page is deliberately left blank.

The Assessment follows

PART THREE – ASSESSMENT OF APPLICATION

1.0.0 The Site and Surroundings

- 1.1.0 The application site sits within a wider triangle of land, two sides of which are bounded by residential development and the hypotenuse of this triangle defined by the Bury St Edmunds to railway lines.
- 1.1.2 The site measures approximately 1.3ha
- 1.1.3 Presently the site forms part of a small field which has hedgerow to the Heath Road frontage
- 1.1.4 A small remote equipped play area is located further to the west.



figure 3: **The Site in immediate context [aerial view]**



figure 4: **The site from Heath Road and the unrelated nearby play area**

2.0.0 The Proposal

2.1.0 Construction of 54 unit extra care units to include 40 apartments and 14 bungalows.

2.1.0 The applicant has explained that “the new extra buildings will be designed around the latest thinking in the older persons’ housing sector and will be built to modern standards in line with HAPPI guidelines. Particular attention will be given to dementia friendly design.”

2.1.1 Included within the scheme are communal facilities.

2.1.2 The design philosophy behind the scheme is described as:

“The resulting design is shaped around a series of open courtyard gardens which provide amenity space for residents and also allow for natural light and ventilation to enter the building. The development has been arranged to maximise the views towards the green spaces surrounding the site. All the trees have been retained and the green infrastructure and biodiversity on the site will be enhanced thorough increased planting and creation of new habitats.

The communal facilities are located centrally to the development and are located to create an active street scene.”

3.0.0 The Principle Of Development

3.1. 1 Central to the determination of this application is Thurston Neighbourhood Development Plan 2019 Policy 3, which states:

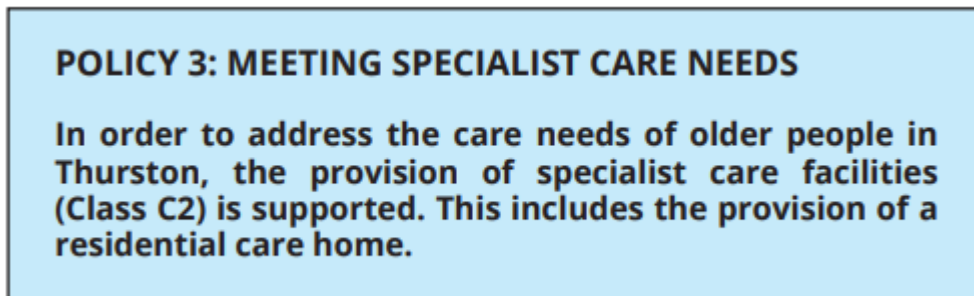


figure 5: **Extract from TNDP19: Policy 3**

3.1.2 The TNDP19 does not specifically allocate a site/s for care home purposes.

3.1.3 The sites that are allocated for development within the TNDP19 are those which relate to orthodox residential development where there is no element of care.

3.1.4 The first question to explore therefore when considering the merits of this proposal is – “To what extent is the fact that the application is outside of the defined settlement boundary in the TNDP19 and the Adopted Local Plan 98 an impediment to securing planning permission?”

- 3.1.5 To answer this question we need to look deeper into the TNDP19. [The Plan]
- 3.1.6 The supporting text to Policy 3 in the TNDP19 explains why the Plan supports the provision of care/assisted living facilities.

“Care home/assisted living

5.18 Feedback from questionnaires shows a clear need for housing that can cope with the various needs of an ageing population. The TNP Steering Group has engaged with a care provider that showed initial interest if a potential site could be made available. Given the nature of the occupiers, the provision of a care home would not expect to significantly increase the traffic pressures on the road system.

5.19 The types of housing envisaged under this policy have been informed by the ‘Housing our Ageing Population Panel for Innovation’ (HAPPI) report⁶ which defines suitable homes for older people. The report states that, “good retirement housing involves plenty of space and natural light, accessibility, bathrooms with walk-in showers, the highest level of energy efficiency and good ventilation, a pleasing natural environment outside, balconies/outside space”.

5.20 The development of homes suitable for older people, including affordable and market housing of a type and size that meet local need, will be supported on sites that satisfy the policies in this Plan.”

- 3.1.7 Clearly the plan is responding to an identified need and there is a strong expression of support for such facilities provided that they are on sites that satisfy the policies in [The Plan].
- 3.1.8 So what does the TNDP19 say about development in Thurston and specifically that which is responding to care needs?
- 3.1.9 To address this question we first need to look to Policy 1 of The Plan as this sets out the spatial strategy for Thurston.
- 3.1.10 Policy 1 opens at Part A with:

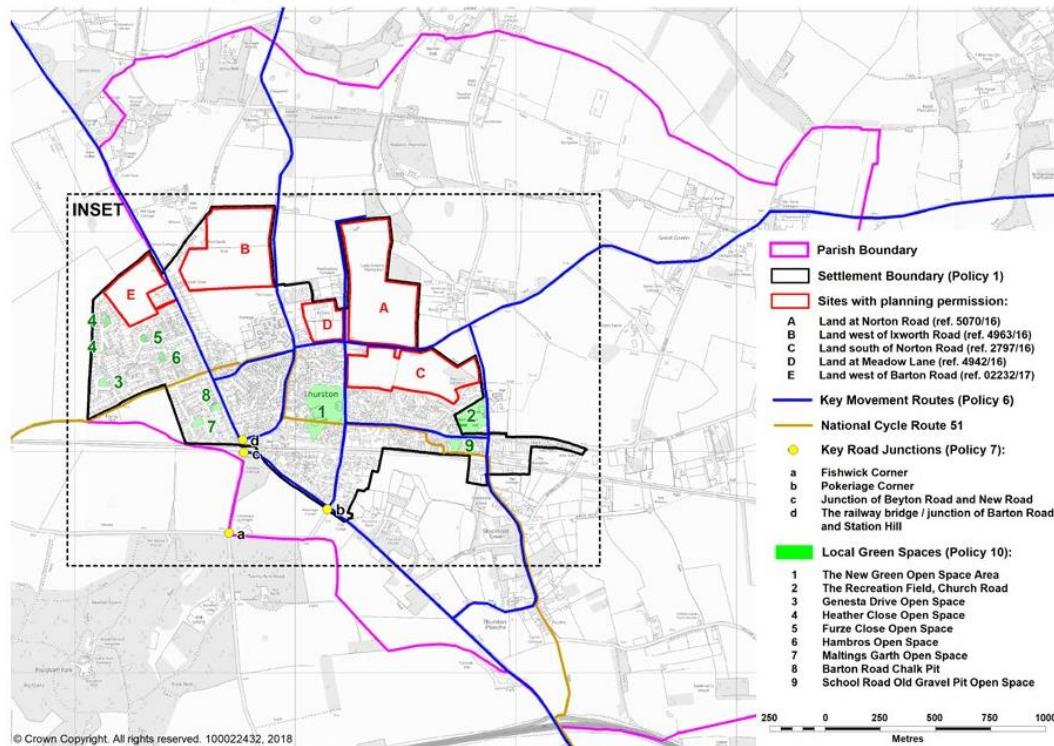
A. New development in Thurston parish shall be focused within the settlement boundary of Thurston village as defined on the Policies Maps (pages 75-76).

figure 6: **Extract from TNDP19: Policy 1 A**

- 3.1.11 The Policies Maps on pages 75-76 show the settlement boundary and that the boundary has been drawn to include five large sites that currently already benefit from planning permission for residential development. [the plan on page 76 is merely an inset of that shown on page 75. Policy 1 affords support for development proposals within the settlement boundary subject to compliance with other policies in The Plan. [Policy 1, Part B]

9 POLICIES MAPS

Figure 12 Locations within the parish



75

figure 7: Extract from TNDP19: Figure 12 – policies map

- 3.1.12 Whilst there is a requirement for new development to be focused within the settlement boundary, there does not appear to be a site that is available for the larger extra care facility being proposed by the applicant within the settlement boundary in the case of the application before the Committee as all of the specifically allocated sites have the benefit of planning permission for orthodox housing.
- 3.1.13 That being the case and as the application site is outside of the settlement boundary what does the TNDP19 say about development outside of the settlement boundary in this case.
- 3.1.14 Policy 1 that addresses specialist housing and care needs on sites that are outside of settlement boundary. This is Policy 1, part D. It states:

D. Development proposals to meet specialist housing and care needs on sites that are outside the settlement boundary will be permitted where it can be demonstrated that no available and deliverable site exists within the settlement boundary.

figure 8: Extract from TNDP19: Policy 1 D

- 3.1.15 On the basis that the TNDP19 supports the delivery of care/assisted living facilities but does not allocate a site within the defined settlement boundary and as there appears not be no immediately available site for such a use Policy 1, part D is engaged.
- 3.1.18 The application site sits within a wider triangle of land two sides of which are bounded by residential development. The hypotenuse of this triangle defined by the railway lines.
- 3.1.19 As a result it does not intrinsically read as part of the wider countryside as that character effectively only fans out from the other side railway line.
- 3.1.20 Certainly the wider site hereabouts reads as open land and that has a character and inevitably residents whose properties currently overlook the wider site gain some enjoyment from that aspect.
- 3.1.21 This proposal if approved will inevitably encroach into and dilute some of that character.
- 3.1.22 A significant element of open land beyond the application site will however remain and will continue to provide amenity.
- 3.1.23 Officers are of the opinion that the development can be approved without undermining objective E1 of the TNDP19 for the reasons described above.
- 3.1.24 In trying to interpret the position it is noted that Thurston Parish Council in its formal consultation response of 21 September 2021 opened by expressing:

“continued support of this application and is of the opinion that this proposal will help address Objective H2 – “To address the specific housing needs of older people....”
- 3.1.25 Whilst the Parish Council went on to say that it anticipated the development setting the highest standards for design and global climate issues at a local level it is clear that it accepts the principle of the development in the location being proposed.
- 3.1.26 It is easy to see why the location, despite being outside of the defined settlement boundary is acceptable for the proposed use. It:
- Is principally for specialist housing and care needs
 - Immediately adjoins the settlement boundary
 - Is within easy walking distance of Thurston Station [just to the south-east] [staff and visitors]
 - Is well connected to existing village facilities [staff, visitors and residents where appropriate]
 - Is easily accessible
- 3.1.27 The location is considered therefore considered sustainable in terms of its accessibility and connectivity.

- 3.1.28 When considering whether the principle is acceptable one must also have regard to flood risk.
- 3.1.29 In terms of 'fluvial' flood risk [rivers and watercourses] the site lies within flood risk zone 1 where there is no sequential presumption against development of this nature.
- 3.1.30 In terms of 'pluvial' flood risk [from surface water/ rainfall events] is noted that the Council's Strategic Flood Risk Assessment produced as part of the Joint Local Plan evidence base indicates a small pocket of surface water flood risk within the site.
- 3.1.31 This therefore requires the Council to consider the sequential test in order to explore whether there is an alternative site within Thurston that is available for the proposed use that does not have any flood risk [fluvial and/or pluvial].
- 3.1.32 This committee report has already noted that there is not a site allocated within the defined settlement boundary for a use of this nature and size. The applicants have not identified such a site as being available themselves.
- 3.1.33 The Council is not aware of any other site outside of the defined settlement boundary being available for the specific development proposed and that supports the applicants own research prior to gaining an interest in the present application site.
- 3.1.34 Certainly the applicant is now able to demonstrate a genuine interest in the land the subject of this application and therefore an ability to deliver the project.
- 3.1.35 That being the case it is necessary to assess whether the identified potential surface water flood risk can be mitigated suitably and effectively.
- 3.1.36 Following discussion and negotiation with Suffolk County Council as the LLFA officers are of the opinion that the identified flood risk can be satisfactorily mitigated. This will be explored in greater detail later in this report.
- 3.1.37 That being the case the potential hurdle to development can be successfully overcome.

3.1.38 Sub-conclusion: Principle

- 3.1.39 The proposal is acceptable in principle as it accords with those policies of the TNDP19 that are most important to the consideration and determination of this application. Namely:

Policy 3: Meeting Specialist Care Needs; and,

Policy 1: Thurston Spatial Strategy, Part D. Specialist housing and care needs outside the settlement boundary

3.1.40 There is not a sequentially preferable site immediately available and the identified surface water flood risk can be suitably mitigated.

3.1.41 Having concluded that the principle of development is acceptable and as that conclusion is supported by Thurston Parish Council this report now moves on to considering the merits of the details of the proposal.

3.2.0 Details

3.2.1 Access

3.2.2 It is intended to access the site via a new vehicular access formed onto Heath Road at the eastern end of the site frontage. Suffolk County Council as local authority has indicated formally that it has no objection to this arrangement.

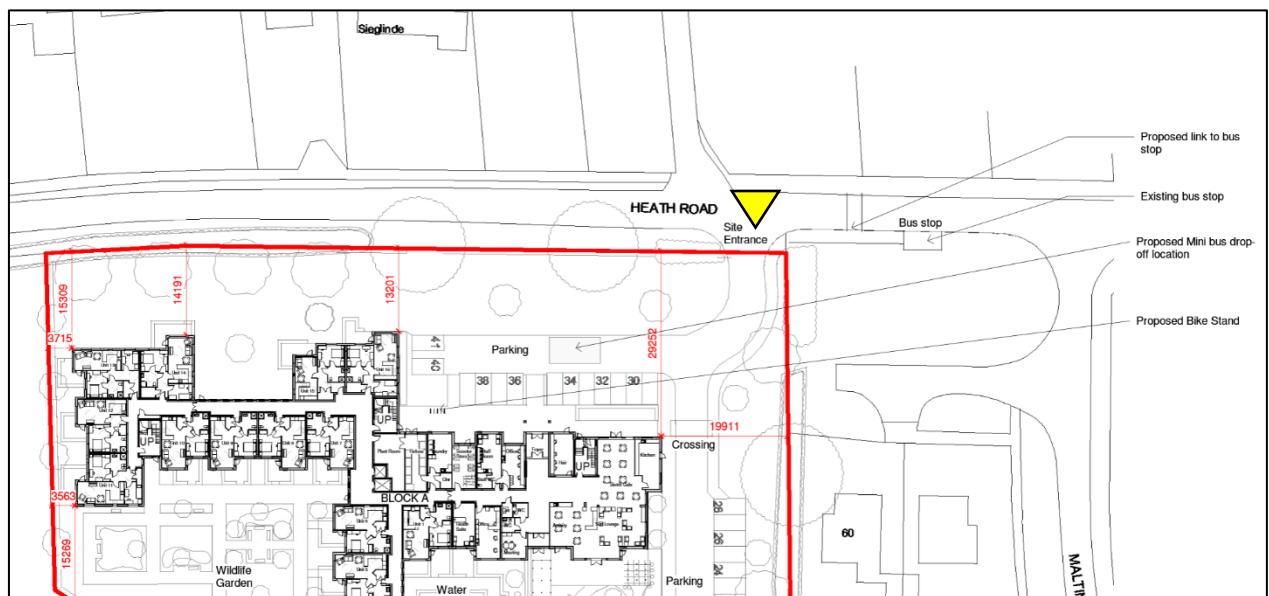


figure 9: **Proposed access**

3.2.3 This new access will also be connected by a new footway to the nearby bus stop just to the east of the site. The majority of existing footway runs along the north side of Heath Road.

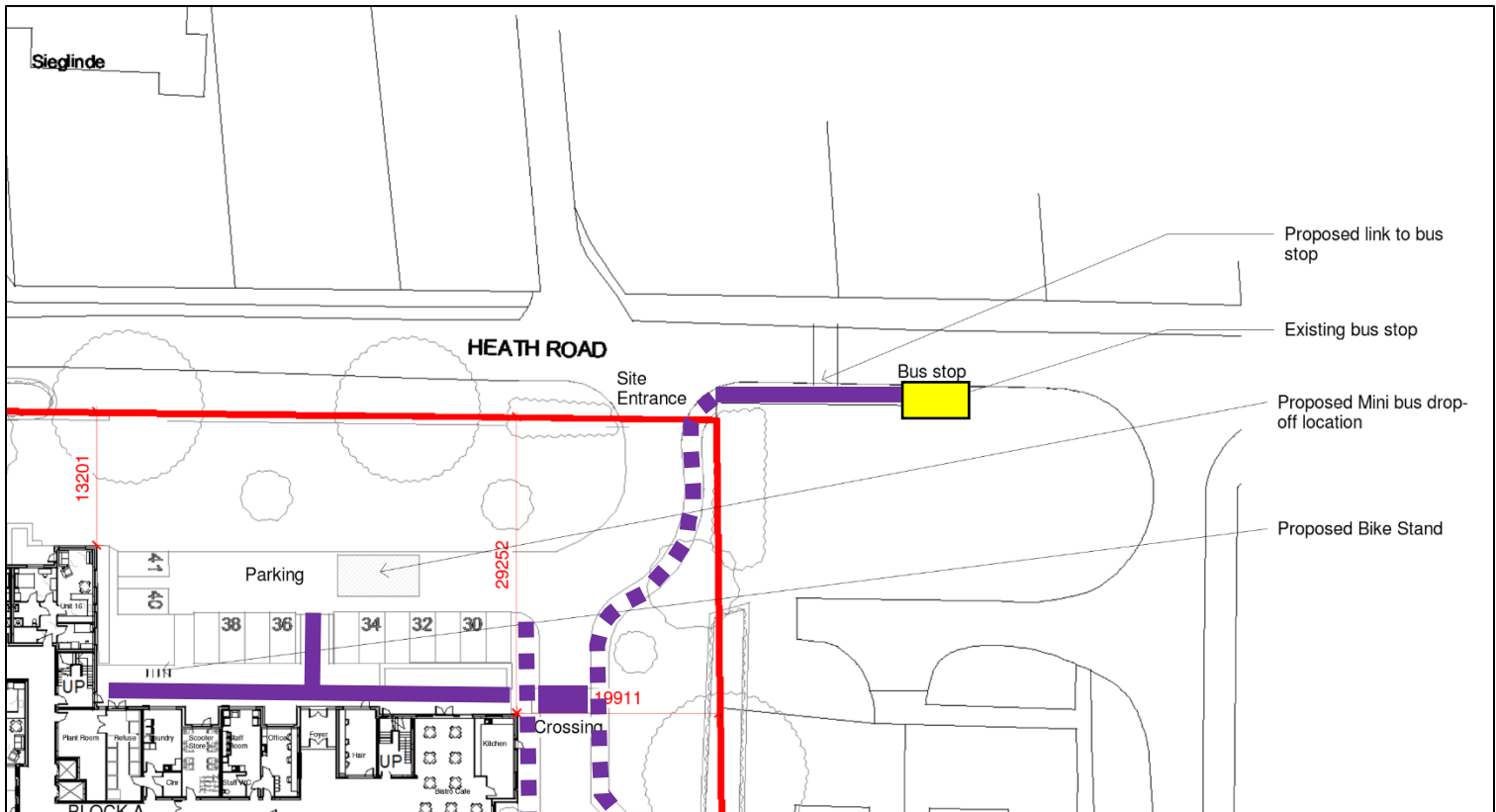


figure 10: **Proposed footway to bus stop, Heath Road**

3.2.4 The bus stop is on the route of the 384 & 385 Stowmarket – Thurston – Bury St Edmunds service.

Mon-Fri: Thurston to Bury St Edmunds

3 buses [384] per day from Heath Road
 5 buses per day incl from post office Barton Road

Return
 2 Heath Road
 4 post office

Sat: Thurston to Bury St Edmunds
 2 buses [384] from Heath Road
 4 buses incl 385 from post office Barton Road

Return
 2 Heath Road/Genista Drive
 3 post office

Mon-Fri: Thurston to Stowmarket

3 buses [384] per day from Heath Road
4 buses per day incl 385 from post office Barton Road

Return
2 Heath Road
4 post office

Sat: Thurston to Stowmarket
2 buses [384] per day from Heath Road
4 buses per day incl 385 from post office Barton Road

Return
2 Heath Road
3 post office

The above includes:

A school service [384] leaves Stowupland High School for Heath Road/Genista Drive at 15.50 Mon-Fri



figure 11: **Existing bus stop, south side of Heath Road near the application site and suggested footway connection [red shading]**

3.2.5 Cycling

3.2.6 It is noted that National Cycle Route 51 runs along Heath Road on its route through Thurston and that Thurston has an extensive and expanding cycle network. This suggests that staff

living within the vicinity who might wish to cycle to work at the extra care centre would find that an attractive prospect. *[subject to noting the staff shower point and the need to provide covered secure cycle parking made elsewhere in this report]*

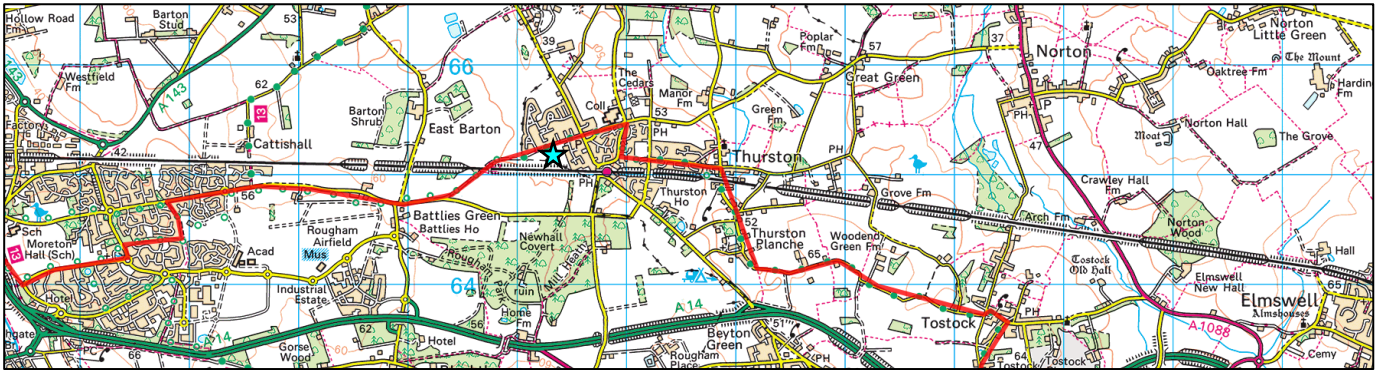


figure 12: **Route of National Cycle Route 51 in the vicinity of Thurston.** *[application site shown with turquoise star]*

3.2.7 Parking

3.2.8 Included within the proposal are:

- A mini-bus drop off point at the from the development [with turning head]
- A proposed bike stand [shown on the layout as having 5 hoops.
- 41 parking spaces

3.2.9 The Council’s Adopted Parking Standards [3rd edition 2019] specify the following parking requirements for a residential care home.

Standard:

Use	Vehicle Requirement	Cycle Minimum	PTW Minimum	Disabled Minimum
Residential care home	1 space per full time equivalent staff + 1 visitor space per 3 beds	2 spaces per 5 staff	1 space + 1 per 20 car spaces (for 1 st 100 car spaces), then 1 space per 30 car spaces (over 100 car spaces).	Dependent on actual development, on individual merit, although expected to be significantly higher than business or recreational development requirement

figure 13: **Extract from Adopted Parking Standards [3rd edition 2019] residential care homes**

3.2.10

obs.

3.2.11 It also will provide 54 units of care accommodation.

3.2.12 Using the parking provision calculation described above that generates a parking expectation for:

$$16 \text{ staff} \times 1 = 16$$
$$54 \text{ units} \div 3 = 18$$

That creates a total requirement of 36 off street spaces.

3.2.13 Within the projected 16 FTE staff there will be shift working and so the provision of the proposed 41 spaces builds in a degree of welcomed capacity. It is therefore unlikely that the proposed use will result in parking spilling out onto Heath Road.

3.2.14 No car parking on spaces for residents are to be provided as a result of the nature of the care provided.

3.2.15 No **disabled parking spaces** appear to have been proposed. For staff or visitors. This should be rectified and **should be secured by condition**.

3.2.16 Vehicle parking spaces measure 5m x 2.5m. This meets the dimension standard at paragraph 3.4.4.2 of the Parking Standards.

3.2.17 Noting the cycle parking requirement within the adopted standards 16 FTE staff generates a requirement for $16 \div 5 = 3.2$ spaces [rounded up to 3]. The layout therefore includes sufficient cycle parking.

3.2.18 Whilst it is noted that sufficient parking rack space is to be provided, it is considered appropriate for this facility to be **covered and secure**. That requirement **should be secured by condition**.

3.2.19 The staff area within main block A [closest to the parking racks] appears not to have a shower facility. This is not what the Council expects from employers seeking to encourage cycling to work. One might also expect staff to have access to a shower.

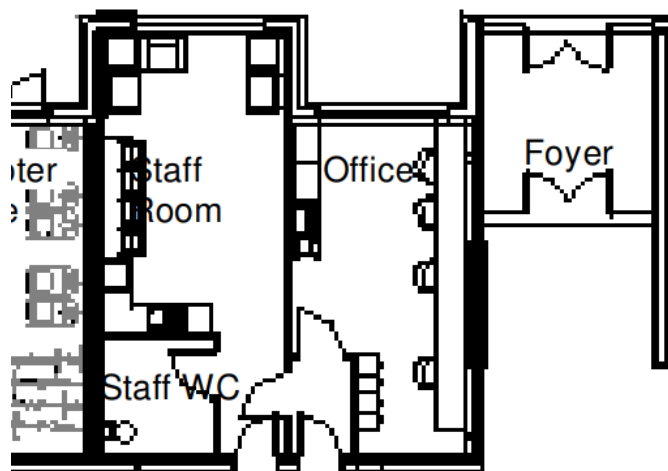


figure 14: **Block A staff room**

3.2.20 The applicant has been asked to expand on whether or not **shower facilities for staff** are included. If not then these **should be secured by condition**.

3.2.21 Layout

2.2.22 The proposed layout will create an interesting campus style development comprising a truncated cruciform shaped main block on the northern half of the site arranged to create two internal and contained garden courtyards. This will create an intimate attractive sense of place for residents.

2.2.23 These outdoor spaces provide what are described as:

- a sun lounge courtyard
- water courtyard with water features
- wildlife garden

2.2.24 It is clear that the outdoor spaces will also provide a delightful and enthralling sensory experience.



figure 15: **Extract from proposed layout plan – northern half of site**

2.2.25 The southern half of the site features a series of six smaller individual blocks containing 14 bungalows, this time arranged generally in a horse-shoe pattern – development on three sides with the fourth side open to create intimate defensible space that will give residents their own communal amenity space and provide a sense of identity.

2.2.26 Eight of these units will have their own small garden.

2.2.27 Scale and Form of buildings

2.2.28 The scale of development falls into two distinct components. A main two storey-building in the northern half of the site and single storey development in the southern half.



figure 16: **Proposed storey heights**

2.2.29 The truncated cruciform shape of the building allows clusters of apartments to be arranged along a full-length corridor from a central access hub comprising both a staircase and lifts

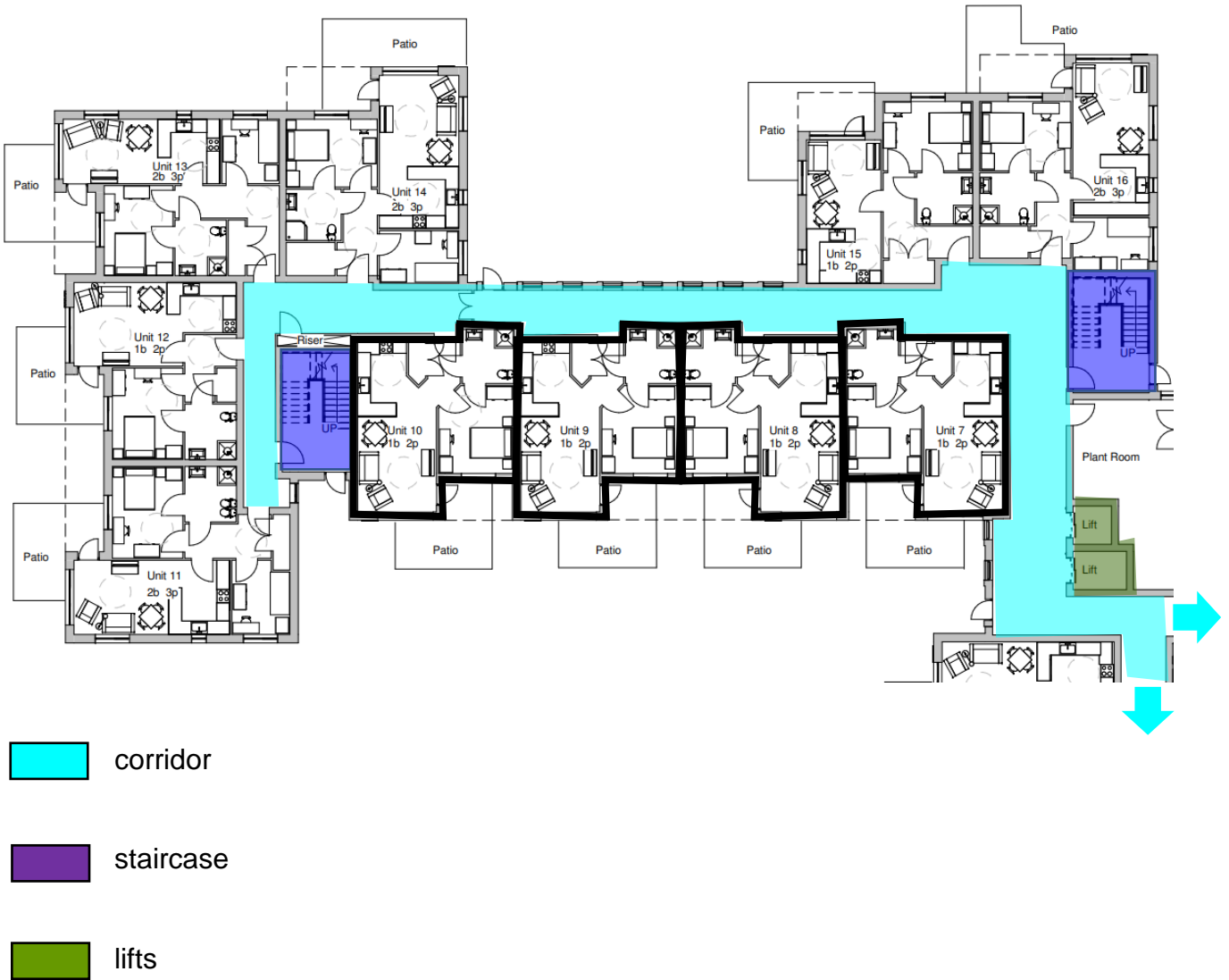


figure 17: Internal circulation space and access [gr fl block A]

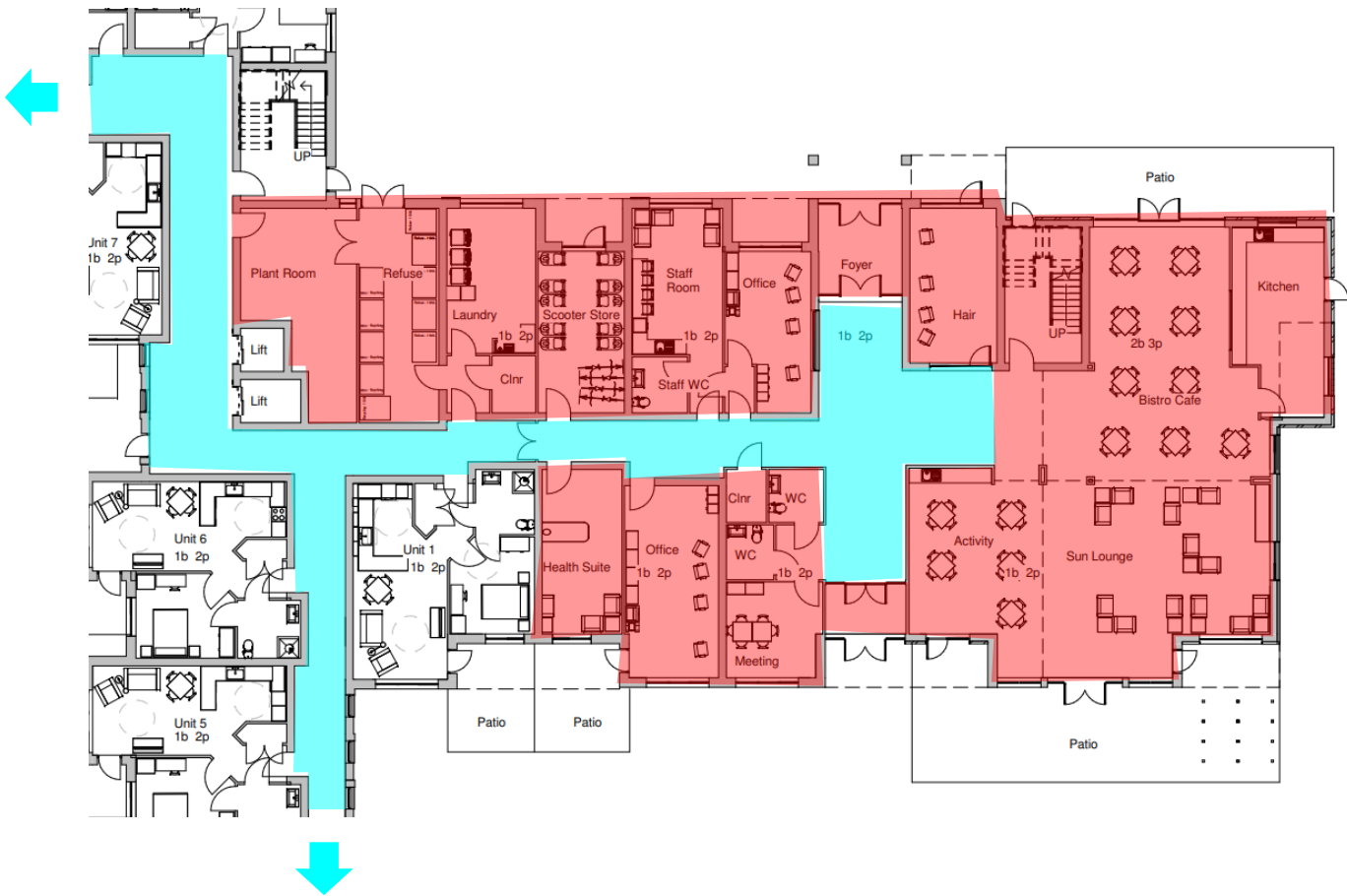


figure 18: **Internal circulation space and ancillary space [gr fl block A]**

2.2.30 Whilst Members may have worries that a block of this size might appear monolithic the architect has cleverly broken down the scale and mass by the use of articulation, changes to materials, decorative brickwork, projecting and recessed balconies at second floor and the inclusion of projecting wings of varying sizes and gables. This has the effect of creating what appear to be as series of juxtaposed buildings. There will be interesting elements of light and shade much of which will change with the passage of the sun. The building therefore should not appear institutional.

2.2.31 These design elements will all work together to present visually interesting elevations. This is particularly true on the sites Heath Road frontage which will be the most prominent to public view.

2.2.32 The following two images show how what might appear at first glance to be a flat elevation is in fact dynamic.

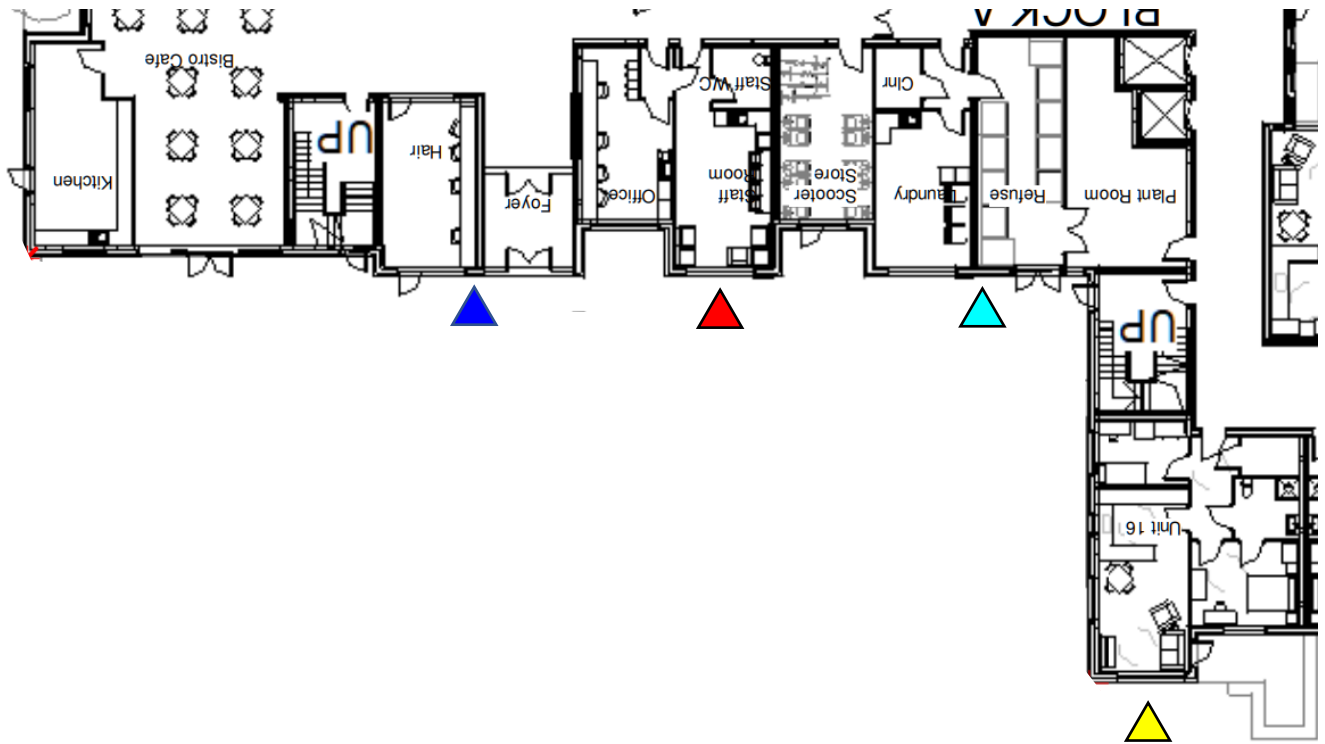


figure 19: **Proposed elevations block A**

CLASSIFICATION: Official



figures 20

**Proposed rear elevation
block A courtyard**

2.2.33 The single storey elements also successfully use articulation and projection to break up the form, thereby adding visual interest and a sense of rhythm that avoids sterile blandness.



figures 21: **Typical bungalow cluster**

2.2.34 Thurston Parish Council has not objected to the scale of the proposed development

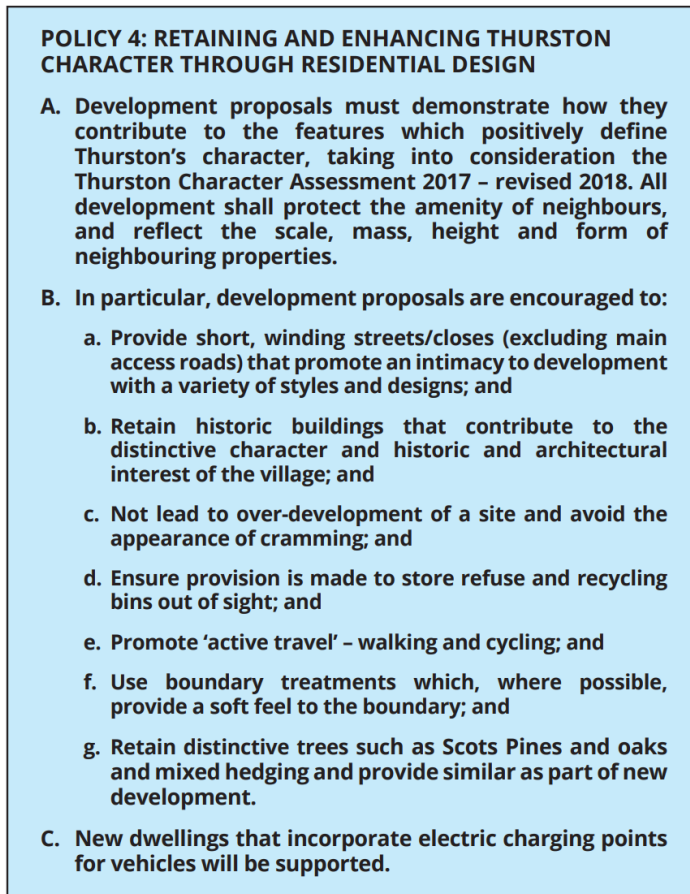
2.2.35 Design/Appearance

2.2.36 The buildings have been designed to produce a fresh modern character.

2.2.37 The nature of the proposed development is such that it is bound to have a character of its own when judging appearance against the requirements of the TNDP19, The Adopted Local Plan, the Suffolk Design Guide and even the National Design Guide. The layout is of a campus style and the elevations have been designed to reflect that fact the each of the buildings is part of a wider whole.

2.2.38 Whilst there is a coherent approach to the design it is not bland or unsubtle. There are design cues and themes that appear across the development that tie it together in a lively and interesting way.

2.2.39 As a result it is difficult to strictly apply THNDP19 Policy 4: 'Retaining and Enhancing Thurston Character Through Residential Design' which states:



POLICY 4: RETAINING AND ENHANCING THURSTON CHARACTER THROUGH RESIDENTIAL DESIGN

A. Development proposals must demonstrate how they contribute to the features which positively define Thurston's character, taking into consideration the Thurston Character Assessment 2017 - revised 2018. All development shall protect the amenity of neighbours, and reflect the scale, mass, height and form of neighbouring properties.

B. In particular, development proposals are encouraged to:

- a. Provide short, winding streets/closes (excluding main access roads) that promote an intimacy to development with a variety of styles and designs; and
- b. Retain historic buildings that contribute to the distinctive character and historic and architectural interest of the village; and
- c. Not lead to over-development of a site and avoid the appearance of cramming; and
- d. Ensure provision is made to store refuse and recycling bins out of sight; and
- e. Promote 'active travel' - walking and cycling; and
- f. Use boundary treatments which, where possible, provide a soft feel to the boundary; and
- g. Retain distinctive trees such as Scots Pines and oaks and mixed hedging and provide similar as part of new development.

C. New dwellings that incorporate electric charging points for vehicles will be supported.

figure 22: TNDP19 Policy 4

2.2.40 Looking at the Thurston Neighbourhood Plan Character Assessment revised 2018 the site sits adjacent to and not within what has been defined as Character Area 1 Barton Road/Heath Road Area



figures 23: **Character Assessment Revised 2018. Character Area 1**

2.2.41 The TNPCA revised 2018 summarises the existing character of Heath Road, Maltings Garth, Heath Court, The Crescent and The Hawthorns as:

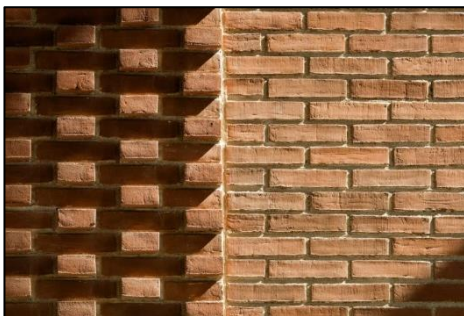
HEATH ROAD, MALTINGS GARTH, HEATH COURT, THE CRESCENT, THE HAWTHORNS



Heath Road is a narrow road with a mix of housing on good sized plots. Area on the northwest boundary was formerly heath land. Arable field lies on the south side. Mature trees and garden hedges. Maltings Garth – early 1970s housing with generous plots, open green spaces and some distinctive trees.

figure 24: **Character Assessment Revised 2018. Character Area 1: Extract**

- 2.2.42 The proposed character cannot be said to be reflective of the established character of Heath Road in the immediacy of the application site. It will if approved have a character all of its own.
- 2.2.43 That character is not inappropriate as it will sit between the railway line and the south side of Heath Road and read as a self-contained development with a unique appearance that reflects the sense of place that it is trying to create for its residents whose particular needs require an element of care within a pleasant and contained environment.
- 2.2.44 Thurston Parish Council has not objected to the design [save for **ev charging** provision which can be increased through the application of a **suitable condition**]
- 2.2.45 An example of the use of interesting design elements is the use of panels of projecting bricks laid in an alternate pattern to create texture and allow sunlight to play across them casting moving shadows as the sun arcs across the sky.



figures 25: **Detailing example**

- 2.2.46 Thurston Parish Council has not objected to the proposed elevations

2.2.47 **Materials**

- 2.2.48 Where consistency with Policy 4 of the TNDP19 can be achieved is in the use of materials from the traditional palette. In places the drawings show buildings in cream bricks which are typical of the Suffolk palette, elsewhere the bricks appear to be of a buff multi. This is less synonymous with Suffolk. It is recommended that a condition requiring the further submission of brick details is appropriate and that the palette should include soft red stock bricks as well as cream and/or buff bricks provided the latter are not yellow in hue.
- 2.2.49 Typically bricks in this part of Suffolk are Suffolk Whites, Gault cream bricks and soft red/orange stock bricks]
- 2.2.50 The submitted drawings do not specifically identify the type of roof material intended for use – the application form merely describing them as grey tiles.
- 2.2.51 The Council will expect the roof materials to be either real Welsh slate or artificial slates of a size, colour, profile, texture and thickness that us authentic with real slate. Large format concrete tiles are not acceptable.
- 2.2.52 It is recommended that the use of appropriate traditional materials from the vernacular Suffolk palette be secured by condition.**
- 2.2.53 Amenity Space** [for residents of the development]
- 2.2.54 The application includes a range of spaces for residents from formal communal garden space, small private amenity to many of the ground floor units, incidental space beside pathways and strategic landscaping.
- 2.2.55 These not only combine to provide excellent enclosed amenity for recreation but also create a sense of airiness. The communal gardens are accessible and feature extensive seating and pathways.

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figure 26 follows.....

Amenity Areas and Landscaping



figure 26: Amenity Areas and Landscaping Northern half of site

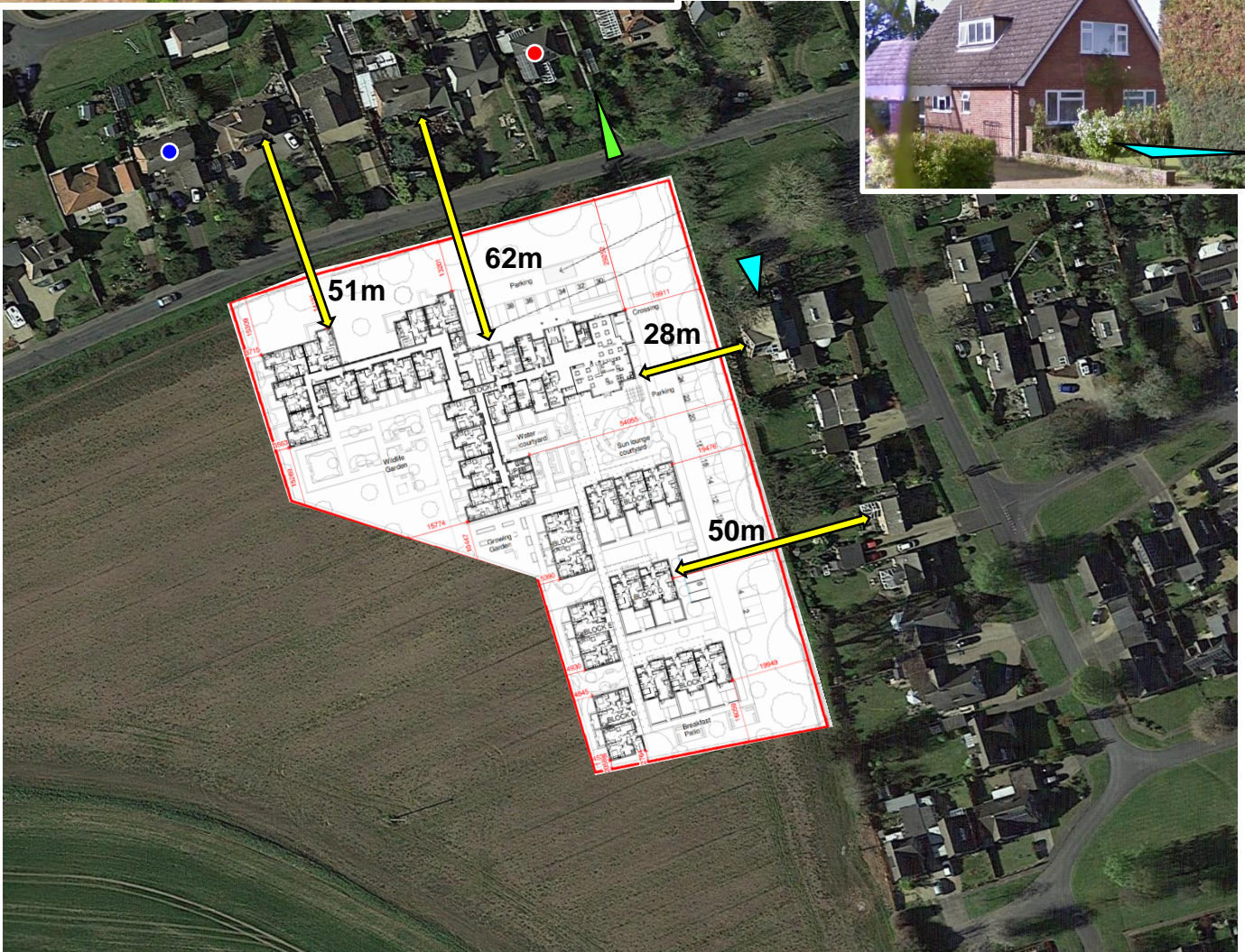


Figure 27: **Amenity Areas detail extract**

2.2.56 Residential Amenity [adjoining properties]

- 2.2.57 The elongated two-storey building proposed to front Heath Road will be set back from the edge of the carriageway behind an approximately 13m deep landscape belt. This will immediately soften the visual impact of the development on the streetscene by reinforcing the dominance of flora.
- 2.2.58 Existing dwellings on the opposite side of Heath Road [*predominantly bungalows*] are themselves generally set back from the edge of road by substantial front gardens such that the building-to-building distances [existing to proposed] range from approximately 50m to 62m.
- 2.2.59 This is sufficient to ensure that there is not a significant infringement on the amenity enjoyed by the houses opposite in terms of potential loss of daylight/sunlight, harm to outlook from visual dominance, undue invasion privacy.

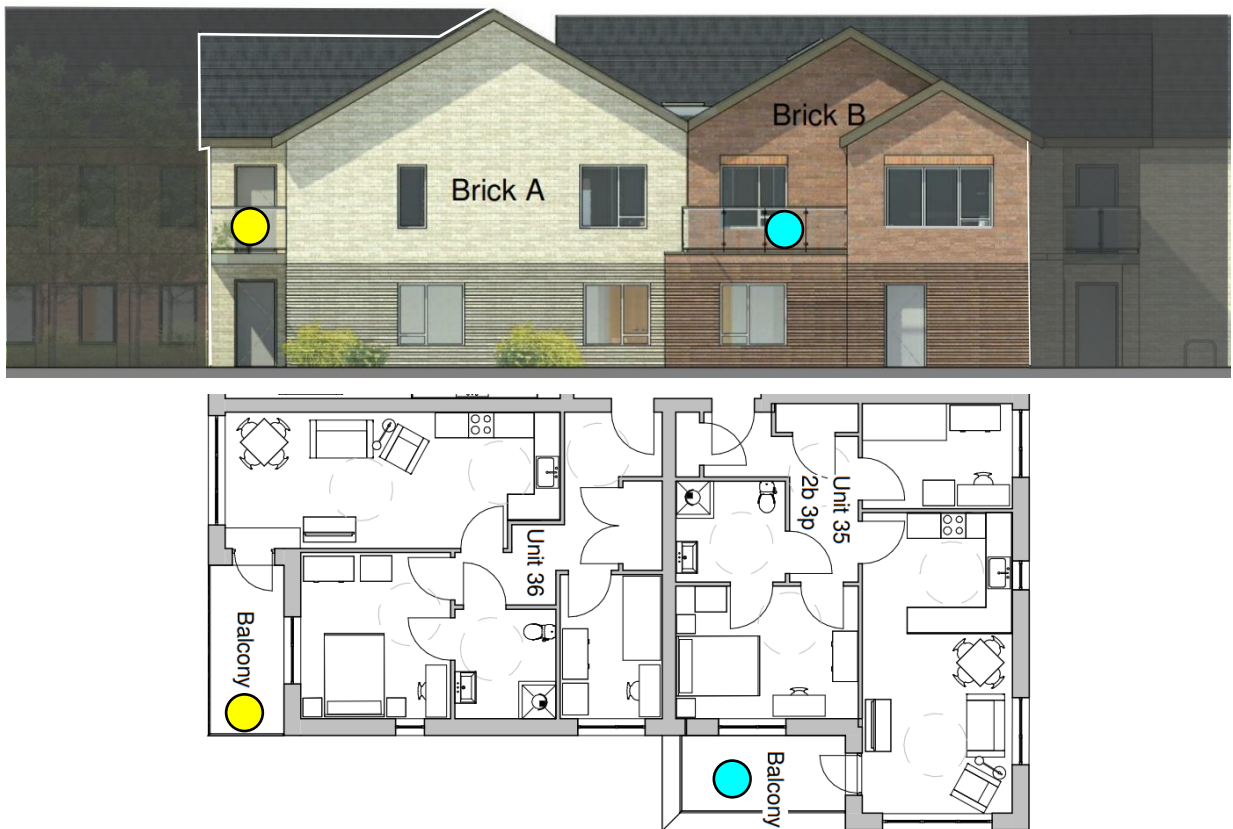
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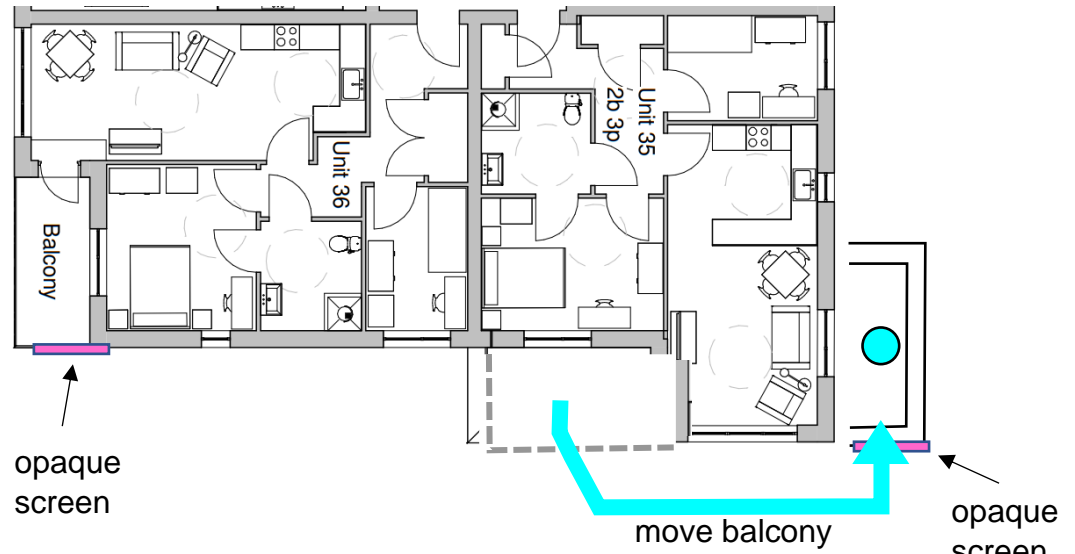
figures 28: Distances to adjacent dwellings

2.2.60 Looking now at the impact of the proposed development on existing properties that lie immediately to the east on the west side of Maltings Garth Members will note that existing rear gardens run up to the boundary of the proposed extra-care facility.

- 2.2.61 It is therefore important to assess whether proximity of proposed built-form and associated uses will cause unacceptable impact/s on the amenity enjoyed not just within rooms to the rear of those homes but also their gardens.
- 2.2.62 The closest of the neighbouring properties, number 60 Garth Maltings Garth, is some 28m from the closest part of the proposed building, thereby exceeding the Council's established back-to-back norm of 25m. The proposed building at this point is two storey and the elevation presented are end elevations.
- 2.2.63 Whilst the acceptable back-to-back distance is noted officers believe that the inclusion at first floor of balconies within the closest end wall to number 60 Maltings Garth may pose a risk of unacceptable overlooking. This can be easily remedied however, by relocating one balcony to the front elevation whilst serving the same apartment and room and an addition of a side screen to it and the other balcony. The latter is side on to number 60 whereas the one to be relocated is full on as shown below. The suggested remedy is shown in figure 30.



figures 29: **Possible amenity issues from balconies in end wall [east] of block A**



figures 30: **Resolving possible amenity issues from balconies in end wall [east] of block**

2.2.64 It is recommended that these adjustments are secured by condition.

2.2.65 Whilst it is proposed to provide parking spaces along much of the sites eastern boundary, arranged at right angles to the rear garden boundaries of properties in Maltings Garth this is unlikely to result in acceptable disturbance as vehicle turnover is likely to be low and there is intervening landscaping.

2.2.66 No properties lie to immediately the west or south of the application site and so the question of possible impact on residential amenity in these directions does not arise.

2.2.67 The single storey blocks are unlikely to pose any risk to the amenity of properties in Maltings Garth as a result of their low profile and the fact that in places they are more than 50m from adjoining houses [back-to-back].

2.2.68 Boundary Detailing

2.2.69 The submitted landscape drawing indicates the following for the edges of the site:

- West, South West, South: MF1 - 1.2m high estate railing
- East: TF2 - Proposed timber post and rail fence with added stock proof mesh, to eastern boundary **[height to be confirmed]**

- North: landscaping

2.2.70 This is appropriate in principle but full detail is needed as to the type of posts and rails [timber or metal], the type of mesh [incl colour] and the full heights in all cases]. It is recommended that this information be secure by condition

2.2.71 Ecology and landscaping

2.2.72 Included in the design are:

Bird boxes
Bat boxes
Insect hotels
Log piles
Native hedging
Wildflower Meadow

2.2.73 The applicant has been asked to provide a Biodiversity Net Gain statement and the response will be reported verbally at the meeting.

2.2.74 That said, Members will have noted the consultation response from Place Services - Ecology which raises no objection subject to specific conditions.

2.2.75 The ecological impact is therefore considered acceptable with the added conditions suggested by Place Services.

2.2.76 Whilst the advice of Place Services – Landscape is noted in respect of the benefit of receiving a Landscape Visual Assessment, development management officers are of the opinion that the fact that this site is already bounded on two sides by residential development and the railway on its third side it does not read as part of the open

countryside. Indeed views in and out of the site are already constrained by the intrusion of the railway.

2.2.77 Members will have noted the support offered by Thurston Parish Council to this proposal.

2.2.78 Indeed the Parish Council hopes to work with the Thurston Relief in Need charity that owns the application site and land around it in the event of planning permission being granted for the extra care facility to recreational use of the wider site for the benefit of the community. This will further reinforce the character of the land as informal recreational space rather than countryside per se.

2.2.79 In terms of the proposed detailed landscaping within the site this is considered acceptable.

2.3.0 Drainage

2.3.1 The application has been the subject of ongoing discussion and as reported earlier further information is being submitted and considered at the time of writing this report. Officers are working with the LLFA and the applicant on establishing that that ground water flood risk can be satisfactorily mitigated such that the buildings can be kept safe and flood risk not increased elsewhere. Recent discussion suggests a positive outcome can be achieved. That said **a verbal update for Members will be provided at the meeting if not in tabled papers.**

2.3.2 Members will have noted that the application has:

- not attracted objection from the Environment Agency
- not attracted objection from Anglian Water
- and is outside of the East Suffolk Drainage Boards catchment

2.4.0 Archaeology

2.4.1 Members will have noted the comments from SCC Archaeology and the fact they raise no objection subject to conditions:

“There are no grounds to consider refusal of permission in order to achieve preservation in situ of any important heritage assets. However, in accordance with the National Planning Policy Framework (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.” - extract

2.5.0 Lighting

2.5.1 The comments made by Thurston Parish Council in respect of the need for sensitive lighting are shared by officers and what's more echoed by Place Services. It is recommended that if Members are minded to grant planning permission then a **specific condition be added** to any permission [if such is forthcoming] **requiring submission of a lighting strategy and full external lighting details** – in the interest of safeguarding wildlife, residential amenity and to prevent unnecessary unacceptable skyglow whilst providing a safe and secure environment for residents, staff and visitors of/to development.

2.7.0 Heritage

2.7.1 Noting the consultation advice of the Council's Heritage Officer:

“The site lies adjacent to existing residential development on two sides and will appear entirely within the context of this existing development. There do not appear to be any heritage assets whose setting would potentially be affected by the proposal. Accordingly I do not consider the proposal would result in any harm to any heritage assets.”

...Members can be assured that this development will not have no harm heritage assets.

2.7.2 Having undertaken the necessary assessments Members are advised that the proposed development is acceptable within the context of the Section 16 of the NPPF 21: Conserving and enhancing the historic environment and the Council's duties under S66 of the Planning (Listed Building and Conservation Areas) Act 1990.

2.8.0 Wider highway considerations

2.8.1 In determining this application care needs to be given to ensure that the proposal conforms to TNDP19 Policy 7: Junction Capacity at Key Junctions. It states:

Extract from TNDP19 follows....

POLICY 7: HIGHWAY CAPACITY AT KEY ROAD JUNCTIONS

A. Where a Transport Assessment or Transport Statement is required, this should address the transport impacts on road junctions, particularly including the following junctions on the Policies Maps:

a. Fishwick Corner;

b. Pokeriage Corner;

c. Junction of Beyton Road and New Road;

d. The railway bridge/junction of Barton Road and Station Hill.

figure 31: **TNDP19 Policy 7A**

2.8.2 The County Council as local highway authority has not raised conflict with TNDP19 Policy 7 as an issue in this case.

2.8.3 Whilst Heath Road provides access to Barton Road from which a traveller can head north towards the Bunbury Arms Junction or south under the railway bridge towards either Pokeriage Corner or Fishwick Corner the expected level of traffic to be generated is so low as not to pose a highway capacity issue at any of the junctions identified in policy 7.

2.8.4 Thurston Parish Council has not raised conflict with policy 7 as a material issue in this particular case.

2.8.5 Members will be familiar with proposed developments within Thurston where this has been the case.

2.8.6 In the context of the low traffic generation Policy 6 B [a] [b] is not engaged and there is no need for junction improvements required to accommodate this development on the local highway network.

2.9.0 Sustainability

2.9.1 In the supporting Sustainability Statement the agent describes the following features as being included in the design to enhance the green credentials of the development.

- Orientation and passive design to maximise solar gain at different times of the day

- Fabric first approach [exceeding⁵ Building Regulations by a minimum of 48%]
- Mechanical Ventilation Heat Recovery [MVHR]
- Apartment heating will be supplied by low surface temperature electric panel heaters
- Hot water via electric immersion
- EV charging to one in five spaces
- SuDS drainage system

Renewable energy

“A full review will be undertaken of renewable energy sources which will be best suited to the site and building will be completed at the technical design stage. This will include looking at solutions to provide heating and hot water.”

- 2.9.2 Members will have noted that the Council’s sustainability officer raises no objection subject to conditions and with a recommendation that ev charging point numbers be increased.
- 2.9.3 Officers have already indicated that support for the Parish Council’s concerns about a seeming lack adequate ev changing is recommended through the addition of an appropriate **condition requiring further details and additional charging points.**

PART FOUR – CONCLUSION

3.0.0 Planning Balance and Conclusion

- 3.1.0 It is clear from this report that a variety of adopted policies within the various elements of the Council’s Adopted Development Plan may be said to be relevant to the consideration of this proposal. These policies all sit within the within the basket of relevant policies and regard needs to be and has been given to them in this report.
- 3.1.1 The Adopted Development Plan is the starting point for determining any application.
- 3.1.2 The Thurston Neighbourhood Development Plan 2019 [TNDP19] is the most recently adopted expression of planning policy relevant to the determination of this planning application.
- 3.1.3 The most important policies for the determination of this planning application are Policies 1 and 3. These specifically relate to the settlement boundary of the village and meeting specialist care needs in Thurston. It contemplates such needs being satisfied *outside* of

⁵ Report prepared July 2021

the Settlement boundary for Thurston in certain circumstance that apply here with the application before Members.

- 3.1.6 The proposed development is considered to accord with those policies and Thurston Parish Council's support for the principle of this development on this site reinforces that point.
- 3.1.7 It is also considered to conform to Policy 2 [part E] Meeting Thurston's Housing Needs [addressing the needs of older people] of the TNDP19. This view is shared by Thurston Parish Council who support the principle of delivering this extra care facility on this site. This too needs to be given significant weight.
- 3.1.8 In such circumstances the benefits associated with the development and the fact that it complies with the most important policy for the determination of the application [TNDP19 Policy 3] means that any harm that may arise from a development outside of the settlement boundary for Thurston is significantly outweighed in the planning balance.
- 3.1.9 The proposal is consistent with other relevant policies within the TNDP19 as analysed earlier. Regarding other policies of the development plan, where taken together policies CS1, CS2, and H7 strictly control new development in the countryside, the development in this case is held to be acceptable because in the words of policy CS2 it would represent a facility meeting a proven local need. Even if conflict were identified, and the direction of those policies differed from that of the TNDP19, they would yield because the TNDP19 is the most recently adopted development plan document. It therefore remains that because of the specific nature of this proposal it is the policies of the TNDP19 that should be followed.

Overall, the development is considered to accord with the development plan as a whole.

- 3.1.10 The proposed development is consistent with paragraph 8 of the NPPF21 in that it is a sustainable development.
- 3.1.11 In terms of economic-sustainability it represents *amongst other things*:
- a significant financial investment within the District
 - an opportunity for short-term construction jobs and opportunities for local suppliers and contractors
 - an opportunity to create 16 FTE direct jobs in the healthcare sector
 - an opportunity to support indirect jobs via local suppliers
- 3.1.12 In terms of environmental-sustainability it represents *amongst other things*:
- the chance to enhance biodiversity
 - the occasion to plant additional landscaping [accepting that the development will itself introduce built-form into the landscape south of Heath Road and north of the railway line and that this will in any event require softening].
 - The opportunity to include electric vehicle charging and energy and water conservation measures

- A chance to facilitate improved accessibility to an existing bus stop [*albeit largely for staff and visitors to the extra care campus*].
- The chance to create tranquil spaces that engage and stimulate the senses through the medium sight, sound, touch and smell.

3.1.13 In terms of social-sustainability it represents *amongst other things*:

- an opportunity to provide much needed specialist care in a safe and supportive environment to those who need it from the older community.
- the chance for the proposed development to include over time ancillary facilities such as a possible hairdressers and/or a small café facility that can also be used by the wider population helping to foster a sense of cohesion and integration between the new residents and the established community
- the chance for the land owner, The Thurston Relief in Need [TRiN] Charity to secure funding through the sale of the land to invest in charitable activity within Thurston.
- An opportunity for Thurston Parish Council to engage with TRiN after the sale to explore whether there is an opportunity for joint working to deliver new community facilities on the remainder of the site [or part of it]. Whilst this desire sits outside of the consideration of the application before Members it has been reported that TRiN is not in a position to explore additional community use until the future of the application site has been resolved.

3.1.14 In the light of the above the positive benefits in terms of sustainability lend weight to the proposal.

3.1.15 The proposed use with its light traffic generation expectations is not considered to pose significant highway safety or capacity issues. It is supported by Suffolk County Council as local highway authority. It takes due regard of T10 of the Adopted Local Plan 98 and TNDP19 Policy 6 - Key Movement Routes, Policy 7: Highway Capacity at Key Road Junctions and policy 8: Parking Provision and paragraph 110 of the NPPF21 and is therefore considered acceptable from a highway point of view.

3.1.16 With the mitigation suggested in this report the proposed development is unlikely to result in any unacceptable harm to the amenity enjoyed by nearby residential properties. This sympathetic juxtapositioning with careful attention within the layout and design to create a good neighbour should attract positive weight.

3.1.17 The proposed development will not result in harm to any heritage asset. It therefore complies with the Adopted Development Plan and Section 15 of the NPPF 21 Conserving and Enhancing the Historic Environment.

3.1.18 The introduction of built form on the part of the south side of Heath Road will inevitably change the character of the wider parcel of land within which it sits. That landscape has

no special designation. However, the proposed mitigation in terms of landscaping and biodiversity enhancement is considered suitable. The application site sits in the elbow of continuous length of development that currently borders the application site on two sides. The fact that the railway line runs close by means that the wider parcel of land does not read with the wider rural landscape that spreads out beyond the railway. Its landscape impacts are therefore limited. It is officer judgement that the impact of this development with its mitigation on the landscape and/or ecology is significant. This can therefore be given low weight.

3.1.19 The design and appearance of the development will be of a high quality and will lend its own character to the area in way that is considered acceptable. This should attract substantial weight as should the fact that this is a sustainable development within the meaning of the golden thread of sustainability that runs throughout the NPPF21, with particular reference to paragraph 8 therein the NPPF21.

3.1.20 Conclusion

3.1.23 The proposed development is considered acceptable for the reason fully described in this report should be approved without delay in accordance with Paragraph 11 c of the NPPF21.

RECOMMENDATION

1. That in the event of the LLFA being able to formally withdraw its holding objection as a result of being satisfied that the additional drainage information recently submitted has adequately addressed their concern's;

then:

2. Authority be delegated to the Chief Planning Officer to GRANT full planning permission subject to conditions that shall include:
 - 2 year commencement condition
 - Use restricted to the purpose of extra care and ancillary purposes only and no other use [in whole or part] including any use that may ordinarily fall within the same use class or constitute permitted development
 - No occupation until a footway to the satisfaction of the local highway authority has been provided from the development to the nearby bus stop on the south side of Heath Road. That path to remain in perpetuity
 - Approved drawings subject to modification of prescribed balcony positions and the inclusion of suitably opaque screens to prescribed balconies as described in the report

- No additional windows apertures or other openings to be installed in the eastern flank wall/s of block A and no dormers skylights or other openings to be installed into roof spaces
- Additional ev charging points to the satisfaction of the Council prior to occupation
- Additional details of precise materials to be used and these to be from a traditional vernacular palette
- Further details as to heights of boundary enclosure and the types of posts, rails and mesh to be used
- Prior to proceeding above slab level, the submission of external sensitive lighting scheme. Such scheme as shall have been approved by the lpa shall be implemented prior to occupation and thereafter retained.
- Tree protection and hedge protection measures
- Staff shower facilities
- Secure and covered cycle parking
- Landscape management plan
- Construction method statement
- Ecological mitigation
- Implementation of ecological appraisal recommendations
- Energy statement
- Communications strategy
- Regular liaison with the Parish Council throughout the construction phase of the development
- Such conditions as may be required by the LLFA and are considered reasonable by the CPO
- As required by SCC Highways
- As required by Environmental Health
- as required by SCC Archaeology

Along with such other conditions as may be deemed reasonable and necessary by the CPO;

- 3 In the event that the LLFA is unable to withdraw its holding objection then the CPO is not able to determine the planning application and it must be re-presented to Committee.