

TABLED PAPER

Mid Suffolk District Council: Planning Referrals Committee
8 March 2023

Item 8a

DC/19/02090

Land To The East Of, Ixworth Road, Thurston, Suffolk

The following formal comments supporting REFUSAL dated 3 March 2023 has been received from Thurston Parish Council. The Parish Council has also indicated that it will wish to have a representative address the Committee at the meeting.

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

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



SENT AS AN E-MAIL

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

3rd March 2023

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

Case Officer: Vincent Pearce

The Parish Council, in light of the intended appeal by the applicant and the intention of the Local Planning Authority to formally determine this application, has reviewed its original comments on the proposal and is formally confirming that it continues to object to this application in its entirety.

The Parish Council, taking into account the recent Court of Appeal ruling in *R(Thurston Parish Council) v Mid Suffolk DC [2022] EWCA Civ 1417*, still contends that this application is for land outside of the settlement boundary which in itself is contrary to the District's own policies in the determination of applications beyond the settlement boundary.

1. The granting of planning permission on sites, including windfalls, in Thurston since 2017 has meant that there are over 1,253 dwellings in the planning pipeline for Thurston, i.e. with planning permission for some but not yet completed or occupied. Whilst it's for the Joint Local Plan to ultimately address the objectively assessed housing need of Mid Suffolk district over the period to 2036 and also to determine Thurston's contribution to that, given the levels of growth in the planning pipeline, the fundamental concerns of the Parish Council about highway capacity and lack of investment in key infrastructure have not diminished and the Parish Council contends that Thurston should not be expected to accommodate any further demand for housing developments of this size.
2. As has been previously stated, a cumulative approach was required through the planning process to provide improvements to mitigate against any severe impacts that the granting of planning permission on six significant sites would have to ensure that they did not result in unsustainable growth of the village. The Parish Council is concerned that the granting of permission for this additional site, is unsustainable, unsafe and will have a severe impact on the Highway Network in and around Thurston.
3. Thurston Parish Council continues with its objections further on the grounds that there is now significantly more data and understanding of the data coming forth in terms of mitigation required.
4. Reference is drawn to the previous comments raised by SCC Highways Officers on the solutions to the severe negative impact that additional growth will have on the Highway Network and the lack of investigation to ascertain whether the measures put in place are effective or require further investigatory work. The Parish Council also feels that as there has been no further update from Suffolk County Council on how future growth will be mitigated, these serious limitations within the highways network which have no quick or simple solution must be addressed prior to further development being considered.

5. It is also held that further exacerbation of traffic issues at this point in the village (Ixworth Road) will occur given the close proximity of this site on Ixworth Road to College Park further along Ixworth Road and the potential increased use of proposed the car park to the rear of the College as a parking facility for parents dropping off and collecting children from the College.
6. The Parish Council also draws reference to the Local Planning Officer's Report to the District Council's Planning referrals Committee (Part Two Reviewed Assessment [8 March 2023]) with regards to its 5-year housing land supply position " The Council's ability to demonstrate that it has an abundance of sites sufficient to accommodate the likely growth for many years to come now suggests there is no immediate or pressing imperative to approve yet more housing in Thurston on top of that already approved, which comprises [of] more than 1000 dwellings. As above, this is a particular bearing upon the significance of the conflict identified with policies CS1, CS2, and H7".
7. Previous concerns as raised are still deemed to be valid and are repeated below:
 - Density of the build – the Parish Council is concerned that there is an urban feel to the design which neither complements nor enhances the village. Overall the spatial strategy is of a poor design not in sympathy with the village character and fails to take into account guidance as given within Suffolk County Council's (2000 revised) Suffolk Design for Residential Areas, or even the Government's Manual for Streets and Manual for Streets 2 as well as Historic England's Streets for All documents. It further fails to take account of Policy 4: Retaining and enhancing Thurston Character through residential design of the Thurston NPD as it fails to deliver housing design that fits in with the surrounding area and is in character with that of a rural village rather than that of an urban location.
 - Type of dwellings – overall the Parish Council has a concern that the application has failed to demonstrate that the housing mix is justified with regard to planning policy, the local context and viability. There is a failure to provide a housing mix that will create a broad-based community as it fails to consider incorporating a range of property sizes and types and the Parish Council is concerned that the overall design neither complements nor enhances the village.
 - Within the northern side of the village, there are no 2.5 storey dwellings built within the vicinity of this site. The Parish Council is concerned that their inclusion at different roof heights from the surrounding dwellings will provide for a street scene that is neither in keeping with the surrounding area nor enhancing of the area as a whole.
 - The Parish Council is also concerned at the paucity of bungalows within the application and feels that the overall scheme does not represent a consideration of the need locally in terms of demand and those wishing to downsize from existing dwellings. It has also failed to respond to the consultative findings of the Thurston NDP which reflected residents desire and support for houses in groups of no more than 50 dwellings. Overall the Parish Council has a concern with the size of the smaller dwellings and would request that all properties are built to current Nationally Described Space Standards as published March 2015.
 - The traffic survey previously undertaken on behalf of the applicant failed to take into account the school finishing times and instead concentrated on the peak times of 7-9am and 5-7pm. There has been a failure to take into account the impact on this area of traffic movements and in particular the narrowness of Ixworth Road and the movement of young people at Ixworth Road to gain access to the College.
 - Lack of landscaping detail – overall the detail the landscaping of the site overall is limited and fails to provide details in particular of the species to be used in terms of trees and shrubs along with details of the 5-year care plan to be implemented. Further details on the hard and soft landscaping to be used should be submitted and must allow for public and private spaces to be clearly defined and soften the edge of the development leading into the countryside which it abuts. Furthermore, the Parish Council would like to see species that will form a strong and effective boundary, such as hedge forming shrubs rather than exotic or ornamental plants and will wish to ensure that there is sufficient detail and budget provision allocated to ensure a high-quality boundary scheme is delivered. Appropriate landscaping should be used to ensure that boundaries are respected and that residents would feel that their personal space is protected. There is also little detail on the landscaping for the SUDs area and this should have accompanied the application along with further details on planting features including species to be used.
 - The Parish Council has requested on similar applications that there should be a greater emphasis on appropriate soft landscaping to the street scene in order to protect the visual amenity of the area as well as further enhancements to the public open spaces to create a strong green infrastructure and attractive outlook from properties and to ensure the biodiversity of the site is maintained.
 - Generally the Parish Council feels that the green space area located to the north of the site is in the wrong space to allow it to come forward as an open space area. The open space should be located to the southern part of the development and contain facilities that are available for all to use as they would be located within reasonable walking distance of the majority of the units within the development scheme as well as those nearby. Such a facility should be of a demonstrable recreational or amenity value and should be multi-functional.

- A PROW runs to the southern edge of the site which will be severely compromised by a significant loss of views and amenity from the PROW. There are important views across the site to the north looking out of the area and the proposal will detrimentally impact on those views looking out of the area.

In summary, the Parish Council contends that this application should not be supported as it fails to adhere in the main to POLICY 4: RETAINING AND ENHANCING THURSTON CHARACTER THROUGH RESIDENTIAL DESIGN of the Thurston NDP which states that development proposals as submitted, must demonstrate how they contribute to the features which positively define Thurston's character, taking into consideration the Thurston Character Assessment 2017 – Revised 2018. The development does not protect the amenity of neighbours, nor does it reflect the scale, mass, height and form of neighbouring properties and fails to contribute towards the positive aspects of local character. The Parish Council requests that the desires to the community, which were clearly expressed through engagement in the production of the Thurston NDP are respected and that sites coming forward should demonstrate that they are in conformity with the Thurston NDP.

Yours sincerely,

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

Thurston Parish Council's objection to the application from 2019 is reproduced below:

From: Thurston Parish Council <info@thurstonparishcouncil.gov.uk>
Sent: 22 May 2019 22:13
To: Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>
Cc: Philip Isbell <Philip.Isbell@babberghmidsuffolk.gov.uk>; BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>
Subject: Re: MSDC Planning Re-consultation Request - DC/19/02090

Hi Vincent,

Just to confirm that the Parish Council, at its Planning Committee meeting tonight, discussed this and a number of other applications.

The Committee unanimously agreed to recommend this application for refusal and I will write formally citing the reason for such a recommendation tomorrow. The full response should be with you my midday on Friday.

I trust this is acceptable.

Regards

Vicky

Mrs V S Waples
Clerk & Proper Officer to the Council
Thurston Parish Council
New Green Centre
Thurston
IP31 3TG

Telephone: 01359 232854
Website: www.thurston.suffolk.cloud

From: Thurston Parish Council <info@thurstonparishcouncil.gov.uk>
Sent: 24 May 2019 10:44
To: BMSDC Planning Mailbox <planning@babberghmidsuffolk.gov.uk>; Vincent Pearce <Vincent.Pearce@babberghmidsuffolk.gov.uk>
Cc: Philip Isbell <Philip.Isbell@babberghmidsuffolk.gov.uk>
Subject: RE: MSDC Planning Re-consultation Request - DC/19/02090

In addition to the letter of objection sent this morning the Parish Council also makes the point that the application is contrary to Paragraph 170 of the NPPF as it fails to contribute to and enhance the natural and local environment. Indicatively this land is likely to be Grade 2- best and most versatile land and the Parish Council is disappointed to note that no Agricultural Land assessment has been carried out for this site. It is noted that the other significant planning applications for the village had to prepare an ALC assessment which confirmed the grading.

The Parish Council is further concerned that, to date, committed development in Thurston has taken over 22% of best and most versatile land with this proposal pushing the loss figure to well over 25% within the parish. This is a non-renewable resource and the Parish Council objects to further such losses and the impact on the local environment.

Regards

Vicky

Mrs V S Waples
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SENT AS AN E-MAIL

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

23rd May 2019

Dear Mr. Isbell,

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

Case Officer: Vincent Pearce

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

Whilst it acknowledges that the applicant met with the Parish Council for a pre-application discussion, it has failed to take any regard of the comments made at that meeting and has failed to take effective note of the workings of the Thurston Neighbourhood Development Plan (NDP) which has now passed its examination stage. The Examiner has concluded that, subject to amendments as highlighted by the examiner, and which do not significantly or substantially alter the intention or nature of the Draft Plan, the NDP as submitted meets the Basic Conditions and should proceed to Referendum. It is felt by the examiner that the Thurston NDP will provide a strong practical framework against which decision on development can be made and as such the Parish Council contend that it is to be regarded as a material consideration in the determination of this application.

1. As has been mentioned by the Parish Council on similar applications for new dwellings outside of the settlement boundary, since 1st November 2017 it has been asked to consider a number of planning applications for new dwellings outside of the Built- Up Area Boundary of Thurston. This application on land to the east of Ixworth Road is outside of the amended built-up area boundary and as such is contrary to not only policies within the Mid Suffolk Local Plan but also the post examination Thurston Neighbourhood Development Plan POLICY 1: THURSTON SPATIAL STRATEGY which states that all new development in Thurston parish shall be focused within the settlement boundary of Thurston village as defined within the Policies Maps on pages 76-77 of the Thurston Neighbourhood Plan.
2. The general approach in the Thurston Neighbourhood Plan, fully supported by the Parish Council is that growth will be focused on the 5 significant sites which were granted planning permission as of 2017 (which are located within the settlement boundary as amended by the Neighbourhood Plan) and on small scale infill sites within the settlement boundary. As these sites are expected to provide high quality schemes which generally enhance the public realm and improve accessibility for pedestrians and cyclists, it is felt that this proposal will neither enhance nor protect the village facilities given its location outside of the settlement boundary.
3. The granting of planning permission on 5 sites in late 2017 has meant that there are over 1,000 dwellings in the planning pipeline for Thurston, i.e. with planning permission but not yet built or occupied. Whilst it is for the Joint Local Plan to ultimately address the objectively assessed housing need of Mid Suffolk district over the period to 2036 and also to determine Thurston's contribution to that, (given) the levels of growth in the planning pipeline; the fundamental concerns of the Suffolk County Council Highways Team about highway

capacity; and the need to deliver major new education infrastructure in the form of a larger primary school on a new site, the Parish Council contends that Thurston should not be expected to accommodate any additional growth outside of the settlement boundary as revised.

4. As previously stated, it was considered that approval of 818 dwellings at the Mid Suffolk Planning Referrals Committee Meeting on 1st November 2017 was a level of development that was of such a strategic scale that a cumulative approach was required through the planning process to provide improvements to both mitigate against any severe impacts to ensure that they did not result in unsustainable growth of the village. The Parish Council is concerned that additional growth such as that now being considered, is unsustainable, unsafe and will have a severe impact on the Highway Network in and around Thurston.
5. Thurston Parish Council therefore objects to this application on the grounds that there are no further mitigation measures that have been identified that will provide solutions to the severe negative impact that additional growth will have on the Highway Network and draws reference to the letter submitted by SCC Highways (Steve Merry (SCC) to Ben Elvin (MSDC) 13 Oct 2017) who raised concerns that, following mitigation measures being implemented (for those planning applications approved at the meeting of 1st November 2017), the roads in and around Thurston will be operating at capacity if all the developments go ahead. In his letter it is stated:

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

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

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

6. In addition, the decision taken by Suffolk County Council to implement changes to its School Travel and Post-16 Travel Policy by only providing children aged 4-16 years old with transport to their nearest school with an available place (phasing in the policy from September 2019) will impact on the Thurston Community College which has a wide catchment area. Indications are that a significant number of parents will continue to support their school choice and as such there will be a negative impact on the rural infrastructure with an anticipated increase in the numbers travelling to and from school via car.
7. It is felt that further exacerbation of traffic issues at this point in the village will occur given the close proximity of this site on Ixworth Road to the large-scale development taking place further along Ixworth Road and the potential increase use of the rear of the car park to the rear of the College as a parking facility for parents dropping off and collecting children from the College.
8. Further concerns to be raised cover the following:
 - Density of the build – the Parish Council is concerned that there is an urban feel to the design which neither complements nor enhances the village. Overall the spatial strategy is of a poor design not in sympathy with the village character and fails to take into account guidance as given within Suffolk County Council's (2000 revised) Suffolk Design for Residential Areas, or even the Government's Manual for Streets and Manual for Streets 2 as well as Historic England's Streets for All documents. It further fails to take account of Policy 4: Retaining and enhancing Thurston Character through residential design of the Thurston NPD as it fails to deliver housing design that fits in with the surrounding area and is in character with that of a rural village rather than that of an urban location.
 - Type of dwellings – overall the Parish Council has a concern that the application has failed to demonstrate that the housing mix is justified with regard to planning policy, the local context and viability. There is a failure to provide a housing mix that will create a broad-based community as it fails to consider incorporating a range of property sizes and types and the Parish Council is concerned that the overall design neither complements nor enhances the village.
 - Within the northern side of the village, there are no 2.5 storey dwellings built within the vicinity of this site. The Parish Council is concerned that their inclusion at different roof heights from the surrounding

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

- The Parish Council is also concerned at the paucity of bungalows within the application and feels that the overall scheme does not represent a consideration of the need locally in terms of demand and those wishing to downsize from existing dwellings. It has also failed to respond to the consultative findings of the Thurston NDP which reflected residents desire and support for houses in groups of no more than 50 dwellings. Overall the Parish Council has a concern with the size of the smaller dwellings and would request that all properties are built to current Nationally Described Space Standards as published March 2015.
- The traffic survey undertaken on behalf of the applicant has failed to take into account the school finishing times and instead concentrated on the peak times of 7-9am and 5-7pm. There has been a failure to take into account the impact on this area of traffic movements and in particular the narrowness of Ixworth Road and the movement of young people at Ixworth Road to gain access to the College and planned Primary School to be located along Norton Road.
- Lack of landscaping detail – overall the detail the landscaping of the site overall is limited and fails to provide details in particular of the species to be used in terms of trees and shrubs along with details of the 5-year care plan to be implemented. Further details on the hard and soft landscaping to be used should be submitted and must allow for public and private spaces to be clearly defined and soften the edge of the development leading into the countryside which it abuts. Furthermore, the Parish Council would like to see species that will form a strong and effective boundary, such as hedge forming shrubs rather than exotic or ornamental plants and will wish to ensure that there is sufficient detail and budget provision allocated to ensure a high-quality boundary scheme is delivered. Appropriate landscaping should be used to ensure that boundaries are respected and that residents would feel that their personal space is protected. There is also little detail on the landscaping for the SUDs area and this should have accompanied the application along with further details on planting features including species to be used.
- The Parish Council has requested on similar applications that there should be a greater emphasis on appropriate soft landscaping to the street scene in order to protect the visual amenity of the area as well as further enhancements to the public open spaces to create a strong green infrastructure and attractive outlook from properties and to ensure the biodiversity of the site is maintained.
- Generally the Parish Council feels that the green space area located to the north of the site is in the wrong space to allow it to come forward as an open space area. The open space should be located to the southern part of the development and contain facilities that are available for all to use as they would be located within reasonable walking distance of the majority of the units within the development scheme as well as those nearby. Such a facility should be of a demonstrable recreational or amenity value and should be multi-functional.
- A PROW runs to the southern edge of the site which will be severely compromised by a significant loss of views and amenity from the PROW. There are important views across the site to the north looking out of the area and the proposal will detrimentally impact on those views looking out of the area.
- To the east of the site is Meadow Lane which is a Green Lane. This lane is unmetalled and vegetation is allowed to colonise freely. The Parish Council is concerned that the proposal will negatively impact on its status as a Green Lane and highlights that there is no provision for maintenance of this lane given the proposal to create pedestrian links to this area to allow connectivity.

In summary, the Parish Council contends that this application should not be supported as it fails to adhere in the main to POLICY 4: RETAINING AND ENHANCING THURSTON CHARACTER THROUGH RESIDENTIAL DESIGN of the Thurston NDP which states that development proposals as submitted, must demonstrate how they contribute to the features which positively define Thurston's character, taking into consideration the Thurston Character Assessment 2017 – Revised 2018. The development does not protect the amenity of neighbours, nor does it reflect the scale, mass, height and form of neighbouring properties. According to the examiner there is robust background evidence within the Character Assessment to support policy 4 to help ensure that new development contributes towards the positive aspects of local character. The Parish Council requests that the desires to the community, which were clearly expressed through engagement in the production of the Thurston NDP are respected and that sites coming forward should demonstrate that they are in conformity with the Thurston NDP.

Yours sincerely,

Victoria S Waples

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