



Historic England

EAST OF ENGLAND OFFICE

Mr Dylan Jones
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582721

Our ref: **W:** P00547636

13 January 2017

Dear Mr Jones

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

**LAND WEST OF IXWORTH ROAD, THURSTON , SUFFOLK, IP31 3PB
Application No. 4963/16**

Thank you for your letter of 12 January 2017 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely



David Eve

Inspector of Historic Buildings and Areas

E-mail: david.eve@HistoricEngland.org.uk



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Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 16 January 2017 09:27
To: Planning Admin
Subject: 4963/16 - Consultation Response

Application ref: 4963/16
Our ref: 205950

Dear Sir/Madam,

Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.

We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at <https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice>.

Yours faithfully,

Jamie Clarkson
Consultations
Natural England
Hornbeam House, Electra Way
Crewe Business Park
Crewe, Cheshire CW1 6GJ

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

www.gov.uk/natural-england

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

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)
For further information on the Pre-submission Screening Service see [here](#)

From: Iain Farquharson
Sent: 19 January 2017 15:40
To: Planning Admin
Subject: M3. 188878: Consultation on Planning Application 4963/16

Dear Sir/Madam

We have reviewed the documents provided and are unable to find details as to the environmental impact mitigation/sustainability credentials of the proposed dwellings.

Policy CS3 encourages sustainable construction techniques such as using sustainable materials, minimisation of water use, suitable design to maximise solar gain and high levels of insulation to minimise energy use.

In addition the Overall Spatial Vision is:

"By 2021 the East of England will be realising its economic potential and providing a high quality of life for its people, including by meeting their housing needs in sustainable inclusive communities. *At the same time it will reduce its impact on climate change and the environment, including through savings in energy and water use* and by strengthening its stock of environmental assets."

Core Strategy Objectives SO 8

New development will be of a high standard of design and layout and will address the need for energy and resource conservation.

We request the developer provide information as to their proposals in this area. Until satisfactory information is received the recommendation is refusal of permission.

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

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Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

From: David Pizzey
Sent: 20 January 2017 10:18
To: Dylan Jones
Cc: Planning Admin
Subject: 4963/16 Land west of Ixworth Road, Thurston.

Dylan

I have no objection to this application subject to it being undertaken in accordance with protection measures outlined in the accompanying arboricultural report. Although a small number of trees are proposed for removal these are generally of limited amenity value and should not be considered a constraint.

If you are minded to recommend approval of the scheme then we will require additional information including a detailed method statement and tree protection plan shown against a final layout. This can be dealt with as part of reserved matters or under planning condition if necessary.

Regards

David

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662
Needham Market office: 01449 724555
david.pizzey@baberghmidsuffolk.gov.uk
www.babergh.gov.uk and www.midsuffolk.gov.uk
Babergh and Mid Suffolk District Councils - Working Together

From: planningadmin@midsuffolk.gov.uk

From: RM Floods Planning
Sent: 20 January 2017 10:27
To: Planning Admin
Cc: Dylan Jones
Subject: 2017-01-17 JS Reply Ref 4963/16 Land west of Ixworth Road, Thurston IP31 3PB

Suffolk County Council, Flood and Water Management can make the following initial comment.

The FRA states in section 3.2 Flood History that "The only recorded incident of flooding in the local vicinity highlighted by the SFRA is groundwater flooding at Thurston Railway Station approximately 900 m south of the site."

Suffolk County Council as the local lead flood authority have a number of recorded flood incidents in the parish they ones closest to the proposed development site are on the Baron Rd/Old Norton Rd junction in April & May of 2016.

With regard to the design of the surface water drainage system, the system should be design not to increase flood risk off site (in all events up to 100 year return period); Provide adequate standards of flood protection on site - in most cases no flooding inside buildings in events up to a 100 year return period and no flooding in other areas (apart from designated flood paths /storage areas) in events up to 30 year return period.

Infiltration test, we note that TP9 and TP8 recorded results below 5mm/hr infiltration rate as such would be classed as a fail which is where the land allocated for the primary school is illustrated to be. TP6 & TP4 are just marginally acceptable. Otherwise the other trial pits recorded acceptable infiltration rates including TP7 which is where the attenuation basin/lagoon is illustrated to be located. However further tests at reserved matters should be undertaken to ensure that the infiltration rate for this proposed use of the site is acceptable.

Our preference would be for all private dwellings to drain to their own individual soakaways and that the remainder of the impermeable area drain to the basin/lagoon.

The FRA needs to be updated with a current surface water flood maps from the LLFA and should include a indicative surface water drainage plan as per our documentation list below.

Pre-app	Outline	Full	Reserved Matters	Discharge of Conditions	Document Submitted
✓	✓	✓			Flood Risk Assessment/Statement (Checklist)
	✓	✓			Drainage Strategy/Statement & sketch layout plan (checklist)
	✓				Preliminary layout drawings
	✓				Preliminary "Outline" hydraulic calculations
	✓				Preliminary landscape proposals
	✓				Ground investigation report (for infiltration)
	✓	✓			Evidence of 3 rd party agreement to discharge to their system (in principle/consent to discharge)

		✓		✓	Maintenance program and ongoing maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	Detailed flood & drainage design drawings
		✓	✓	✓	Full structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including Infiltration test results (BRE365)
		✓	✓	✓	Detailed landscape details
		✓	✓	✓	Discharge agreements (temporary & permanent)
		✓	✓	✓	Development management & construction phasing plan

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

From: Nathan Pittam
Sent: 27 January 2017 11:08
To: Planning Admin
Subject: 4963/16/OUT, EH - Land Contamination.

M3 : 188822

4963/16/OUT, EH - Land Contamination.

**Land to the west of, Ixworth Road, Thurston, BURY ST EDMUNDS, Suffolk.
Outline Planning Application sought for up to 250 new dwellings, open space
and associated infrastructure, up to 2.4Ha of land for Thurston Community
College, 2Ha of land for the provision of a new ...**

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that the applicant has submitted a Phase I and II investigation by Nott Group (ref. 72509/R/001) which provides an adequate overview of the contamination at the site. However the Nott Group concluded that there would need to be additional works following the removal of the harvest from the site to determine the scale of areas of made ground on the site. The initial report was dated May 2016 so hopefully the additional work would have been undertaken in Autumn last year. Could I request that this information be provided to us or failing that any permission that may be granted for the site is conditioned to ensure that the additional work recommended by the Nott Group report (ref 72509/R/001) are undertaken in full prior to development commencing at site.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
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m: 07769 566988
e: Nathan.pittam@babberghmidsuffolk.gov.uk
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The Archaeological Service

Resource Management
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk
IP32 7AY

Phillip Isbell
Corporate Manager - Development Manager
Planning Services
Mid Suffolk District Council
131 High Street
Needham Market
Ipswich IP6 8DL

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

Our Ref: 2016_4963
Date: 26 January 2017

For the Attention of Dylan Jones

Dear Mr Isbell

Planning Application 4963/16 – Land west of Ixworth Road, Thurston: Archaeology

This large development site in an area of archaeological potential recorded on the County Historic Environment Record (HER). A prehistoric flint working tool is recorded from within the site itself (THS 025) and a quantity of Neolithic finds were located during archaeological investigations to the south-west of the site. Iron Age finds and features are recorded to the north and south of the site (THS 001 and 004). A Roman road was also recorded during archaeological investigations to the south-west, along with a scatter of Roman pottery (THS 002) and a geophysical survey undertaken within the proposed development area has identified anomalies likely to represent the remains of the road passing through the site. The proposed development is also situated on the edge of Thurston Heath which is likely to have been a focus for early occupation. As a result of this potential, the large scale of the proposal and the fact that the site has been the subject of systematic archaeological investigation, there is a high probability of encountering archaeological remains at this location. The proposed works would cause significant ground disturbance that has potential to damage any archaeological deposits and below ground heritage assets that exist.

At pre-application stage, we advised that this site should be subject to trial trenched evaluation prior to the determination of any submitted applications, to accurately quantify the archaeological resource (both in quality and extent) which survives at the site and also to ground truth the geophysical survey results. However, we note that an outline application has been submitted for the site, which gives some flexibility in the final development design should significant archaeological remains be encountered at the site.

As a result, on balance, 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 141), 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 (2012).

INFORMATIVE:

The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service, Conservation Team.

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation (a 4% sample of the full development area) will be required to establish the potential of the site, **before approval of layout and drainage under reserved matters**, and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation. **We would strongly advise that evaluation is undertaken at the earliest opportunity.**

Further details on our advisory services and charges can be found on our website:
<http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

RAMBLERS ASSOCIATION – BURY ST EDMUNDS GROUP

For the attention of Dylan Jones, Planning Services

Planning reference 4963/16

Outline planning application sought by Persimmon for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on Land West of Ixworth Road, Thurston.

We write to object to the proposed over development of this site which is grossly increased from the Neighbourhood Plan of 50 new dwellings at any one location in Thurston. The public right of way which links Ixworth Road to the East and Mill Lane to the west across the site and to the South will be adversely affected by the loss of open space and the amenity presently enjoyed by both local residents and other walkers alike. This public footpath is part of a well used network and gives easy access to the countryside around the village. This overdevelopment will alter the character of the north side of the village and diminish the enjoyment of a walk in the countryside.

Although we note that there will be a 2m wide footpath/cycleway created along Ixworth Road, this will result in the clearance of natural vegetation and trees and consequently this particular highway is going to be changed from a country road to a very busy thoroughfare, as it will be carrying traffic from the newly proposed Primary School, the new housing development and the Community College, as well as through traffic. Walkers will have to cross this road, which could present safety concerns at peak times. There also seems to be no provision of street lighting along this stretch of road, again a safety hazard.

There is a suggestion that direct vehicular access to the proposed Primary School could be taken from within the residential development (4.11) and not directly off Ixworth Road. This would definitely be a detrimental factor as it would cross the supposedly 'wildlife landscape' surrounding the public right of way as defined on the indicative masterplan.

We are also concerned about the closure of the right of way during construction, should the development go ahead, and would require assurance on this matter.

We would object most strongly if the route of the public right of way is moved from the line indicated on the masterplan. We would require it to remain on its current route on the southern boundary of the site and would not countenance it being diverted to a different route through the development.

We would also wish to have the opportunity to make further comments once the views of other consultees have been received.

Jenny Bradin

Group Footpaths Secretary

01/02/2017

From: Philippa Stroud
Sent: 02 February 2017 16:31
To: Planning Admln
Cc: Dylan Jones
Subject: 4963/16/OUT Land west of Ixworth Road, Thurston IP31 3PB - Other Issues

WK/188880

Ref: 4963/16/OUT EH – Other Issues

Location: Land west of Ixworth Road, Thurston IP31 3PB

Proposal: Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

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

Buildings at Mill Farm are approximately 115 metres from the closest part of the proposed site boundary. If these buildings were used for livestock then the occupiers of the proposed dwellings might experience a loss of amenity from odour, noise, flies etc. associated with their use.

I note there is a pumping station proposed in the south western part of the site. Could the applicant be asked to provide further details please, regarding its noise specification, mitigation measures etc., calculated to the nearest residential boundary and for us to be re-consulted when this information becomes available.

In the meantime, I would make the comment that the application site is in proximity to a number of existing residential dwellings and for this reason there is a risk of loss of amenity during the construction phase of the development. I would, therefore, recommend that if planning permission is granted, a construction management plan be required by means of condition.

Such a plan shall include details of operating hours (which shall be limited to 08.00hrs – 18.00hrs Monday – Friday, 09.00hrs – 13.00hrs on Saturdays, with no working to take place on Sundays, Public or Bank Holidays. Deliveries should also be limited to these hours), means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors), loading and unloading of plant and materials, wheel washing facilities, lighting, location and nature of compounds and storage areas, waste removal, temporary buildings and boundary treatments, dust management, noise management and litter management during the construction phase of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phase, unless otherwise agreed in writing by the Local Planning Authority.

Note: the Construction Management Plan shall cover both 'site clearance' and the construction phase of the above development.

Regards

Philippa Stroud
Senior Environmental Protection Officer
Babergh and Mid Suffolk District Councils - Working Together

From: Christopher Fish

Sent: 02 February 2017 15:57

To: Dylan Jones

Cc: Steve Merry

Subject: FW: Consultation on Planning Application 4963/16 - Land west of Ixworth Road, Thurston IP31 3PB

Dylan,

I regret that I am not going to be able to respond as requested by today, partly because of an unusually high case load at present but also due to the need to assess the cumulative impacts of other pending applications. This work is ongoing and is being led by Steve Merry, Transport Policy & Development Manager for the area. I can confirm that I've spoken with the transport consultant for this development today and they are aware of this study. We should, of course, try to respond fully as soon as possible.

Regards,

Christopher Fish MEng IEng
Senior Development Management Engineer



Developments Affecting Trunk Roads and Special Roads
Highways England Planning Response (HEPR 16-01)
Formal Recommendation to an Application for Planning Permission

From: Martin Fellows
Operations (East)
planningee@highwaysengland.co.uk

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: 4963/16

Referring to the planning application referenced above, dated 16 January 2017, application for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road, Thurston IP31 3PB, notice is hereby given that Highways England's formal recommendation is that we:

- a) offer no objection;
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- ~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is / is not relevant to this application.¹

¹ Where relevant, further information will be provided within Annex A.

Signature



Date: 3 February 2017

Name: David Abbott

Position: Asset Manager

Highways England:

Woodlands, Manton Lane

Bedford MK41 7LW

david.abbott@highwaysengland.co.uk

NEIGHBOURHOOD PLAN TEAM

Parish Council Office
New Green Centre
New Green Avenue
Thurston
Suffolk
IP31 3TG
Tel: 01359 232854
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Councillor P Robinson
Chair of Thurston Planning Committee
Thurston Parish Council
New Green Centre
Thurston
IP31 3TG

Mr P Isbell
Corporate Manager, Development Manager
Mid Suffolk District Council
131 High Street
Needham Market
IP6 8DL

30th January 2017

Dear Cllr. Robinson,

Re: Planning Application 4963-16 – Outline Planning Application sought for up to 250 dwellings, open space and associated infrastructure, up to 2.4 hectare of land for Thurston Community College, 2 hectare of land for the provision of a new Primary School, including details of access on land west of Ixworth Road @ land west of Ixworth

Thank you for allowing the Neighbourhood Plan Team to comment on several planning applications that have been submitted to the Parish Council by a number of agents acting on behalf of Developers. The Neighbourhood Plan Team is aware that, with the submission of 6 applications (one is a duplicate) for a total of over 800 dwellings, Thurston is facing an immediate, exceptional planning issue. The Neighbourhood Plan Team is concerned that if the major applications now submitted are to be dealt with on an individual basis there will be a failure by the District Council to understand the cumulative impact such growth will have on the community of Thurston. It is also held that consideration of each individual planning application will not provide an appropriate response to the National Planning Policy Framework requirements nor to the impact on Thurston itself. It is for this very reason that the Neighbourhood Plan Team have concentrated their efforts at looking at the common issues facing each application as well as looking at the fundamental principle of development for each individual site and where provided, specifically the more detailed layout proposals and their impact given each location.

The Neighbourhood Plan Team would also like to state that in accordance with the Parish Council Protocol's for Pre Planning Application Developments – no comments on the suitability of the site for development or how the site performs in relation to others ahead of the site assessment work were made during the attendance of representatives from any of the Developers/Land Owners or their agents at Neighbourhood Plan Meetings and that whilst all applicants who attended such meetings had been informed that they could state that they had met with the Neighbourhood Plan Steering Group they could not in any forthcoming developer public meetings state that their proposals have in any way, shape or form, been endorsed by the Neighbourhood Planning Steering Group.

Whilst Thurston Parish Council is at a relatively advanced stage in preparing a Neighbourhood Plan and whilst the plan has not yet reached the final stage of allocating sites or proposing policies, following consultation with the public and land owners and agents on the site assessments carried out during Summer – Autumn 2016 it should be afforded some weight in responding to this application. The results of the site assessments as carried out under the Parish Housing Land Availability Assessment, has raised some issues which the Neighbourhood Plan Team feel are so major and fundamental that they must be taken into account by Mid Suffolk District Council in determining these applications.

A copy of all site assessment work can be seen within Thurston's Village website:

<http://thurston.suffolk.cloud/neighbourhood-plan/site-assessment-of-sites-for-development/>

The Neighbourhood Plan Team would like to state that it is disappointed at the speed at which this and other applications have been submitted for new housing in the village. There seems to be a general haste to ensure that each development is the first to submit with little regard for the cumulative impact that each development will have on the general infrastructure of Thurston which requires time to evolve and time to absorb new residents and associated growth. There is a general concern that the size of new developments being proposed will result in Thurston losing its 'village feel' and for it to become 'a small town'.

The Neighbourhood Plan Team is also disappointed that despite reassurances from Mid Suffolk that work on its Local Plan is proceeding, there is still no information being released as to the expected housing growth in the area and that work on the Councils Housing needs (Objectively Assessed Needs) is ongoing.

Given the scale of proposed housing development, the Neighbourhood Plan Team would request that the District Council adopts a cohesive approach that looks at the totality of applications and their impact on all of Thurston's infrastructure and social development. As way of emphasis the following table demonstrates the applications that are facing Thurston:

Owner/Builder	Planning Reference	Status of application	Description of development	Number of dwellings
Playdri Products, Granary Site, Station Road	2430/08	Outline granted. Phase 2 delayed.	Remainder of site with blocks of flats.	92
Playdri Products, Granary Site, Station Road	3181/13	Preliminary work started on phase 1 in 2016.	Single building commercial centre with 9 flats above	9
Bovis Homes, Barton Road	4386/16	No decision Comments closed	Purely residential	138
Hopkins Homes, Sandpit Lane	2797/16 & 5010/16	No decision	Purely residential	175
Pigeon Developments, Norton Road	5070/16	No decision	Residential with 2 form entry primary school	200
Persimmon, Ixworth Road	4963/16	No decision	Residential with primary school (no size given)	250
Laurence Homes, Norton Road	4942/16	No decision	Purely residential	64
Possible number of dwellings to be added to Thurston				928

Regarding the common issues for all six applications submitted (4942/16; 4963/16; 5010/16; 5070/16; 4386/16 & 2797/16), the Neighbourhood Plan Team has broken these down into 4 main areas: Education; Housing and Transport and Social Challenges

- **Education:**
Currently primary education facilities are landlocked and full. Any future housing requires functioning primary education facilities before housing occupancy. The footpath and road network also needs substantial improvement to accommodate additional education provision. It is felt that multiple housing planning applications in Thurston demand a cohesive approach that looks at the totality of applications as well as individual consideration considering the impact of all of them on education and other infrastructure issues. In addition, Secondary students 11-16 currently attend Thurston Community College. Post 16 students are located in Beyton. It is understood that at some point in the future students may relocate to the Thurston site. Further secondary provision is available in both Ixworth and Bury St Edmunds. Suffolk County Council Education Department has indicated that were sufficient housing to be built in Thurston, Woolpit and Elmswell further secondary provision would be required somewhere along the A14 corridor.

Any significant housing would require additional primary education places. Suffolk County Council (letter from Peter Freer to Lisa Evans, MSDC) referring to Planning Application 2797/16 outlines its position:

'NPPF paragraph 72 states 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning

authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

'The NPPF at paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

'We currently forecast to have no surplus places at the catchment Primary School to accommodate children arising [from new developments], but there is some capacity at the Community College. The Primary School site is landlocked and cannot be expanded and the Community College has the largest secondary catchment in the County and is unlikely that expansion would be supported in the future.

'The County Council has been in discussions with the District Council regarding the emerging Thurston Neighbourhood Plan and has provided pupil yields and possible strategies to deal with mitigation from the growth scenarios being assessed.

'The anticipated approach to mitigate the impacts of housing growth in the area is to provide a new primary school which would incorporate the existing primary school. This new primary school would be constructed as a 315-place school initially, capable of being expanded to 420 places to meet future development. The estimated construction cost of a 420 place primary school is £6.9 million on a 2.2 hectare site.'

In addition, given capacity and legislative issues

'... the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 26 place setting, providing sufficient capacity for 52 children in total.'

The Thurston Neighbourhood Plan Team recognises and endorses the County Council position. New housing development on any scale in Thurston requires provision of a functioning primary school with early education places before the occupation of housing. There is no spare capacity in existing provision.

Any chosen location for a Primary School will have an impact on roads and footpaths in the village. There are major transport issues associated with the Community College. Over 25 coaches bring and take students to and from the College daily. The road network is under pressure; the coaches and parents' cars delivering and collecting students near the College create a daily problem. When there are parents' evenings, cars are parked inappropriately on footpaths, verges and close to road junctions.

In the current location, the Primary School presents associated pedestrian and vehicle concerns. In a new location, a larger school will bring added demands. Appropriate footways, road crossings, vehicle access (immediate and wider) and car parking will need to be accommodated. There is nowhere in Thurston that has current adequate provision to assimilate the pedestrian and vehicle movements particularly at the beginning and the end of the day in school term time.

- Housing

Thurston has received 5 planning applications over recent weeks from 5 separate developers. The total number of dwellings proposed by these applications amounts to 827 homes – which would result in approximately a 64% increase in the current total housing stock of Thurston. These figures do not include the 2 existing applications at the Granary which add a further 101 dwellings to the tally. Should all applications be approved, there is a concern that not only will the village infrastructure be insufficient to cope, but the whole nature and ambiance of Thurston will change from that of a large vibrant village to that of a faceless dormitory town. The determination of these applications should be viewed as a whole if the development within Thurston is to be sympathetic and sustainable. Considering each application individually has the potential to allow by default considerably more development than the village could cope with.

A break-down of housing types and numbers (where known) is provided below:

Site	Land west of Ixworth Road 4963/16	Land at Norton Road 5070/16	Land at Meadow Lane 4942/16	Land south of Norton Rd 2797/16	Land west of Barton Rd 4386/16	Land west of Ixworth Road 4963/16	Land at Norton Road 5070/16	Land at Meadow Lane 4942/16	Land south of Norton Rd 2797/16	Land west of Barton Rd 4386/16	Land west of Ixworth Road 4963/16	Land at Meadow Lane 4942/16
Bedrooms	Market Housing					Affordable Housing					Intermediate/shared equily	
1		5									24 appts	
2		4 terraced 12 bungalows	6		4 bungalows		9 bungalows 5 appts				16 houses	
3		25 semis 26 detached	13		3 bungalows 22 houses		3 bungalows 5 appts 12 terraced				6 houses	
4		31 detached	17		46 houses		31 semis 5 detached				2 houses	
5		18 detached	8		13 houses 2 4/5 houses							
Self build		9										
Sub Total	163	130	42	114	90	65	70	18	61	48	22	6
Total	539					280					28	
Final total 827 dwellings												

NB: Types and numbers of dwellings are shown where they have been made available in the Planning Application.

Generally, all the proposed sites are situated on land currently used for agricultural purposes on the outer boundaries of the village. The Neighbourhood Plan Team having considered the agricultural classification of land upon which these sites are situated had been made aware that, based on the generalised 1:250000 maps, the best and most versatile land generally occurs to the north of the village. Whilst it is recognised that individual site classifications are usually fully determined following detailed field work, the Neighbourhood Plan Team is concerned that development is being proposed on the best and most versatile land. Furthermore, all of the sites that have been submitted under planning applications that have come forward, are situated outside the Settlement Boundary and face out onto open countryside. The visual impact of each proposed development on approaching the village will be significant and will have an impact on the existing character and appearance of the countryside.

In general, the sites are of a higher density than those in their immediate vicinity. The plans reflect housing more appropriate to an urban landscape rather than a rural village. Several of the proposals include 2.5 to 3-storey dwellings with ridge heights of up to 12m. No other housing of this type can be found nearby. All the sites have at least one boundary abutting existing bungalows, dormer bungalows or small cottages. The designs are therefore not in keeping with the scale, type or density of housing in their locality.

Feedback from the Neighbourhood Plan Survey indicates that residents accept the need for expansion but in a sympathetic and controlled manner in order that infrastructure can keep pace with demand. Furthermore, they expressed, inter alia, a desire for relatively small developments of up to 50 dwellings with open spaces which reflect those found in other parts of the village. The survey indicates that during the next 15 years, 47% of respondents would be looking for bungalow accommodation, 44% homes suitable for retirees and 17% for assisted living and care homes. The proposed plans do not reflect the residents' future needs and are not, therefore, considered to be sustainable. Neither do the applications reflect the continuing need for housing across all tenures and a growing need for affordable housing. The Ipswich Housing Market Area, Strategic Housing Market Assessment (SHMA) Document and 2014 Suffolk Housing Needs Survey all show that there is a high demand for smaller homes across all tenures

from those who maybe starting households to those who may be looking to downsize. The Enabling Housing Officer at Mid Suffolk in her response to Planning Application 4386/16 makes reference to the fact that affordability issues are the key driver for the increase in smaller homes and that there is a strong demand for one and two bedroom flats/apartments and houses.

The large number of dwellings proposed would result in a substantial increase in the number of motorized vehicles within the residential areas. The Neighbourhood Plan Team does not consider the plans take sufficient heed of on-site parking requirements. This failure will inevitably lead to overspill onto and congestion within adjacent roads.

- Transport

Thurston is situated inside a triangle of A roads, the base of which is the A14, the eastern side is the A1088 and the western side is the A143. The apex of the triangle is just north of Pakenham where the A1088 crosses the A143. There are no B roads inside this triangle. All the interior roads are just for local access and by-roads, which are not maintained by the council to a standard suitable for heavy traffic. Current potholes in some places are described as "a death trap for cyclists". Access to the A14 towards Bury St Edmunds is either via Fishwick Corner where Barton (New) Road makes a junction with Mount Road or via Pokeridge Corner at the junction of Beyton Road, Thedwastre Hill and Mount Road. These have already been found to be accident-prone congested junctions with current traffic flows. At the other end of Barton Road there is access to the A143 and this junction is also often congested and subject to accidents. All of the applications submitted fail to take into account the committed schemes within Bury St Edmunds, Ixworth and Stanton which will alter the traffic flows along these road networks.

The standard S2 single carriage way in each direction type of road, upon which the Transport Assessments base their computer models, is described as 7 m in width. The roads leading into and out of Thurston do not have consistent widths and can be as narrow as 4.3 m. Norton Road, Church Road and School Road have places, unencumbered by parked vehicles, where two cars cannot pass safely and vehicles have to draw right off the road if a bus or larger vehicle comes along. Furthermore the Grade II listed Railway Bridge on Barton Road warns high vehicles to drive in the middle of the narrow road to get through under the arch. While one footway varies in width from 1 m to only 0.7 m, the opposite one tapers to nothing at all. Currently there is only room for one way vehicle flow over the other railway bridge on Thedwastre Road and no safe footway for pedestrians, just a white line one metre from the wall. Thedwastre Road leads to the junction with Beyton Road where congestion in the morning is already well recorded.

The traffic in and around Thurston varies enormously depending on the time of day as the Community College, Beyton Sixth Form College and Ixworth Free School educate students from a wide area, with many students being carried in coaches twice a school day. Travelling through and to the Community College and the Village are Bus Routes TN112; TN114; TN118; TN120; TH140; TN144; TN161 and TN163. In the morning and afternoon 25+ coaches and numerous vehicles deliver and pickup students and have a negative impact on the flow of traffic along Norton Road, Barton Road and Station Hill. In the afternoon this congestion is more noticeable as the coaches arrive in 2 dedicated waves with early arrival by the second wave creating issues. Some routes have a note to coach drivers to approach the College via Station Road to avoid other blocks near the Post Office/village stores on Barton Road where there are usually cars parked, narrowing the road. Other buses, provide a service to Stowmarket to Bury St Edmunds via Beyton and a service from Stowmarket to Bury St Edmunds via Norton. Combined, these give an hourly service to people in Thurston in each direction throughout most of the day Monday to Saturday. The route in Thurston is via School Road, Church Road, Norton Road, Heath Road, Genesta Drive and Barton Road. This means that in addition to the school transport at peak times, buses are travelling through the village throughout the day. Furthermore on a Monday to Saturday there is a bus service to Diss which stops outside Thurston Community College at 0855 and arrives back in Thurston (opposite Community College) at 1605.

From Monday to Saturday, there are hourly train services in each direction throughout the day, generally at 29 minutes past the hour to Stowmarket and Ipswich (east), and 12 minutes to the hour to Bury St Edmunds and Cambridge (west), with variations in the evenings and early mornings. There are slightly fewer trains on Saturdays. On Sundays and Bank Holidays there is a two-hourly service, but there are alternative two-hourly services to Ipswich and Peterborough from Bury St Edmunds. The main drawback to train travel for future growth for those unable to walk to the station is that there are only 12 official parking places provided and these are filled very early in the day. Cyclists also have only 1 cycle rack to hold 4 cycles and a notice telling them that only the official rack may be used. Overflow parking up Station Hill already happens. The rest of the Granary site is the subject of development plans belonging to a private developer and there is no room for the provision of extra parking. Of significant concern to the Neighbourhood Plan Team is the necessity for passengers having to walk across two tracks which carry non-stop passenger and goods trains to access one of the platforms. Although there is a siren, the risk will be heightened the more footfall there is at the station. The Team is concerned that there are no plans to see improvements made to this station at a time when Network Rail are closing rural footpaths that

cross rail tracks due to the dangerous posed, and yet this dangerous crossing, which has to be used every day by many including schoolchildren, is deemed to be safe.

The Neighbourhood Plan Team is concerned that, having viewed the documents still available on Mid-Suffolk's District Planning site for the development at the Granary, no Transport Assessment can be found, although a commercial centre will involve delivery vehicles as well as visits from customers, besides the trips made by the cars and vans used by residents of the proposed 100 or so flats.

The more recent planning applications from agents acting on behalf of Bovis Homes, Hopkins Homes, Persimmon Homes and Pigeon Capital Management 2 Ltd include lengthy Travel Assessments. All state that they have examined the traffic flow at various key junctions in Thurston at AM and PM peak times and supply all their data and name the computer programs they have used to calculate capacity and degrees of congestion. It is noted that the Laurence Homes application for 64 homes is apparently a borderline size which may not need an assessment.

It is also stated in the assessments that the key junctions were decided on in pre-application consultations with Suffolk County Council. These were often examined by more than one developer however the Neighbourhood Plan Team is concerned that none of them examined the flow over the narrow one-carriageway railway bridge on Thedwastre Road and that not all of the applicants included within their crash assessments included Fishwick Corner which has a higher proportion of incidences than other areas quoted.

Developer	Road	Junction	AM 2016	PM 2016	Accidents 2010-2014	AM Future	PM Future
Pigeon Developments	Norton Road	Peak traffic	160→	110←			
Bovis Homes	Barton Road		A	A		+29%	+29%
Pigeon Developments Hopkins Homes		Norton Rd/ Church Rd/ Pakenham Rd	A	A		A	A
Pigeon Developments Hopkins Homes		Norton Rd/ Sandpit Lane/ Meadow Lane	A A	A A		A A	A A
Pigeon Developments Persimmon Homes Bovis Homes Hopkins Homes		Barton Rd/ Station Hill/ Mini Roundabout	A B A B	A A A B	1 Slight 1 Serious	A A B	A A C
Pigeon Developments Hopkins Homes		Beyton Rd/ Thedwastre Rd	D B	C A		D D	C A
Pigeon Developments Persimmon Homes Bovis Homes		Barton Rd/ Norton Rd	A A B	A A A		A A B	A A A
Persimmon Homes		Ixworth Rd/ Norton Rd	C	A		C	B
Bovis Homes		Barton Rd/ A143	D	F	5 Slight 1 Serious	F	F
Bovis Homes		Barton Rd/ Beyton Rd	C	A		D	C
Bovis Homes		Barton Rd/ Pakenham Rd	B	A		B	A
Bovis Homes		Barton (New) Rd/ Mount Rd	D	B	7 Slight 1 Serious	F	B

Using the data provided in the various individual assessments which were undertaken on different dates, the two roads and most of the junctions were recorded in AM and PM as "A" which means Free Flow. "B" is Reasonably Unimpeded. "C" is Stable, "D" is Lightly Congested, "E" is Significantly Congested and "F" is Heavily Congested. The after-development estimates were taken to be in 2021 except Bovis Homes who used 2023. Where different arms of a junction had different levels of flow, the highest was recorded above. It is noted that these records show only a slight increase in congestion after the development has gone ahead. However none of these estimates of future traffic took the other proposed developments into consideration only "background growth" and again the Neighbourhood Plan Team is concerned at the cumulative impact all of the developments would have on the current infrastructure.

Currently, with none of these developments completed, the surveys showed congestion points for commuters leaving Thurston for the A14 and A143 at the edges of the village. Thedwastre Road has the one carriageway railway bridge and its junction with Beyton Road on the way to the A14 is shown already as lightly congested. This involves a long queue of vehicles every morning, Monday to Friday at the junction. The mini roundabout near the station is the most likely junction to become more congested when the Granary development, which has already been passed by the planners, is completed. Records indicate that there have already been accidents there. This route leads to the Grade II listed railway bridge where passage is narrow, the road surface is often flooded, the footways are too narrow to be safe and it is another route to the A14, via Mount Road with a junction that is already highly congested with a record of accidents. At the other end of Barton Road the junction with the A143 is already heavily congested and accident-prone.

The Neighbourhood Plan Team recognises that current guidelines on rural traffic in general and in particular TA23/81 which gives official advice on new road developments, emphasises that rural roads should not be planned to carry more than 75% of their capacity, whereas urban roads are acceptable at 85%. This recognises the difference in quality and ambience between rural and urban living. Urbanites may balance long queues of traffic at peak times against shorter routes to work and more amenities close at hand. Village dwellers know how to duck and weave round huge agricultural vehicles travelling along narrow and winding roads and they pull up and give way with a wave, but they don't expect to have urban conditions of continuous traffic flowing through the village, even if it is a smooth flow as judged by most of the assessments done for Thurston. Villagers expect clean air, the opportunity to cross roads on foot without a long wait and the chance to hear birds singing rather than the continuous drone of traffic.

The Neighbourhood Plan Team recognises that Paragraph 17 of the NPPF is given as the justification for planning applications to be accompanied by a Transport Plan as well as a Transport Assessment: "Planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable."

Following the recommendation by Suffolk County Council, Persimmon Homes, Bovis Homes, Pigeon Developments Ltd and Hopkins Homes have each prepared their Transport Plans. These plans emphasise the opportunities for using public transport, walking (up to 2 km) and cycling. Their aim is clearly to try and reduce the use of private cars, as the plans involve employing someone to monitor the use of private cars in and from the development over a period of five years or so. This would be an intrusion into the private lives of residents which they would have to pay for in the price of the development. The Cycle Trail 51 which is widely quoted is very misleading and should be noted that within the village there is only a short distance along Station Hill and across New Green where it is marked on the ground and separated from other traffic. Children would not be safe to follow it on their own as to access this separated route, they would need to travel along Norton Road and over the crossover close to the junction with Norton Road/Ixworth Road/Station Hill. It should also be noted that should cyclists wish to travel east up Station Hill from Barton Road there are no safe crossing points onto the cycle route and that to access this point, Station Hill would need to be crossed on a bend on a steep hill with poor visibility.

The Neighbourhood Plan Team is therefore concerned that although some of the new applications propose small improvements to footways, crossings, bus shelters and the 30 mile speed limit on Ixworth Road, none of them can substantially improve the key junctions or the railway bridges where conditions will inevitably get worse with any extra traffic. The road system in Thurston was crystallised over a hundred years ago, based on the movement of mainly agricultural vehicles in a rural environment. The borders and junctions of these roads and the railway bridges fitted the traffic flows of that time. In many cases the borders are now built up so that roads cannot be widened and certainly the railway bridges are immovable. Each of the proposed developments would inevitably add more traffic despite efforts to wean people away from driving their own vehicles.

- Social Challenges

The Neighbourhood Plan Team is aware that with all growth the village faces a number of challenges and that whilst there are policies in place to ensure all developments provides a safe community; protects the environment from adverse impacts; reduces the level of crime or overcomes the fear of crime and provides a safe and secure environment, often the social impact of such growth is overlooked.

As such the Team has drawn up a list of the social challenges that will take place in Thurston with an increase in its population, the findings of which are replicated in the table below:

Pros of increase in population	Cons of increase in population
<p>A new purpose-built primary school, more suited to the 21st century, would contribute to the life of the village.</p>	<p>A larger school will support more housing, which Developers will capitalize on. It will trigger more planning applications with family homes. Suffolk County Council work on 25 primary pupils per 100 houses, so there will be many more children which will affect the social dynamics of the village. Pupils will need appropriate cycle ways and paths to get safely to school, as our current school children do. The possible sites for a new school do not lend themselves so easily to safe walking or cycling. This is unfortunate, as it is valuable time for social interaction of children and parents.</p>
<p>Clubs and organizations for all age ranges will have increased numbers and for some this will help their sustainability. This includes the library and churches</p>	<p>Newcomers to the village will put an extra strain on current organizations. If there are more problems with waiting lists it will give rise to bad feelings. Leaders will need support to ensure that they have enough resources to meet extra demands.</p> <p>The popular children's organizations of Brownies, Scouts and the ATC provide valuable social activities for the youth of the village. For the new children to feel welcome in Thurston and be able to have friendships outside school, it is vital that they are able to access such groups. Finding extra leaders and, possibly venues, will not be easy.</p> <p>The Cavendish Hall and New Green may be over-stretched, including their provision for parking. There will be many more demands on these venues with an increased number of young families.</p> <p>Sports clubs may need extra outdoor facilities. Footballers in the village have already highlighted the need for another pitch so this would be even more of a priority.</p> <p>There would be a rise in cycling on the primary traffic routes, which will also have an increase in vehicular movements, around the village for all age groups. A new larger primary school will increase the number of children cycling to school, but also those cycling as a leisure activity.</p>
<p>More residents would support a greater variety of leisure activities than are currently available in the village. Teenagers, particularly, could benefit from this and will find more support for a Skateboard Park.</p>	<p>Difficulties are as described above with leaders and venues.</p>

<p>A greater variety of shops and facilities would be supported, giving residents more choice of various facilities within the village. This could be helpful to elderly people who do not want to travel into town.</p>	<p>More shops and other facilities will change the village atmosphere to one of a small town.</p> <p>This will impact on the social dynamics of Thurston, which views itself very much as a village. Residents may resent the extra shops and facilities rather than welcome them. This will, again, give rise to bad feelings towards the new developments.</p>
<p>More residents would help to support and sustain bus and train services, which add to the choice of social activities outside the village.</p>	<p>The pressure on these services is expected to increase with additional use being promoted through each applicant's Travel Plan with the implementation of measures designed to promote sustainable travel. Young families may however travel by car which will see an increase on the current road infrastructure. Unless improvements are made to the car parking facilities at the Railway Station along with additional cycle facilities there will be a detrimental on surrounding residential areas</p>
<p>More pressure for a Doctor's surgery or Medical Centre.</p>	<p>Medical provision will be impacted within the health catchment area. Currently the nearest practice does not have sufficient capacity for additional growth resulting from further development. As currently stands NHS England is only looking for a Developer Contribution to increase capacity within the GP catchment area. This increase is unsustainable if all applications were to be determined favorably.</p>
<p>Additional footpaths and cycle-ways arising from the new developments would offer more variety of routes for walkers and cyclists. This would help all residents to achieve a healthy life style.</p>	<p>Thurston takes a pride in its footpaths and natural environment. This is the result of well-known residents promoting the paths and looking after its trees and wildlife. A larger population which suddenly arrived in the village would not be familiar with these values and this could also give rise to ill feeling towards newcomers. Such concerns include people not following the country code while walking in the countryside, leading to friction with the landowners. Others are that more dogs may cause problems by being off the lead, worrying live-stock, damaging crops and disturbing ground nesting birds. There is also the matter of dog-mess which is already a cause of irritation if not dealt with correctly.</p> <p>The Suffolk Wildlife reserve at Grove Farm is situated within the Parish of Thurston where walkers can see different habitats, flora and fauna. The reserve can be part of a pleasant destination for leisurely walks and cycle rides. With an increasing population and more visitors, it will be necessary to ensure it is not at risk</p>

As stated previously whilst the Neighbourhood Plan has not yet reached the stage of allocating sites or proposing policies, it has followed a period of extensive consultation with the public and land owners and agents on the site assessments carried out during Summer - Autumn 2016 following the Neighbourhood Plan Team's Call for Sites of January 2016, under the Parish Housing Land Availability Assessment. Throughout this process of consultation, further constraints to development have arisen which the Neighbourhood Plan Team feel are so major and fundamental as to back-up the original overall assessment of this site as being 'strongly negative'.

Overall the Neighbourhood Plan Team would ask the Parish Council to consider its concerns for this application on this site for the following reasons:

- The site has only one vehicular entrance onto Ixworth Road for potentially 250 dwellings with associated localised traffic, which is narrow and at points unsuitable for a main access route to both the housing and proposed Primary School and current Secondary School access points. The proposal also includes a pedestrian link to a footpath leading to Mill Lane and another emergency access point onto Mill Lane

which would be restricted to a footway and cycle path under normal conditions. Furthermore the plans are unclear as to how access will be gained to the Primary School as initially they showing two access points from Ixworth Road (In and Out) but further on there is the suggestion that this could be changed to access from an internal road to avoid parking congestion on Ixworth Road. The preferred choice should be made clear, so that informed comments can be made.

- Ixworth Road is locally acknowledged as having poor vision of oncoming vehicles towards Thurston due to a blind bend which is much more pronounced than appears in the sketch plan of the site, 03 Sketch Block Plan. Planning permission to complete the development of Cedar Close was held up for a period of time due to worries over visibility at the entrance. The access points on Ixworth Road to the proposed primary school are right in this area. Vehicles coming out of the residential part of the site would also add to difficulties at the Cedar Close entrance, where development is now almost complete.
- parking provision for both Primary School and Secondary School is inadequate and will fail to alleviate the current parking problems at the Secondary School.
- road safety with emphasis on the junctions of Norton Road and Ixworth Road which is very close to the Community College at the AM and PM peak times.
- Further road safety issues with emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pokeridge Corner
- Impact of traffic movements on neighbouring parishes e.g. Great Barton and Beyton for those accessing work and leisure facilities
- Location of Primary School entrance and its proximity to the commencement of the 30mph speed limit
- although it is acknowledged that there will be a wide/enlarged path for those accessing the proposed primary school, there is still concern for pedestrian safety at the junctions of Norton Road and Ixworth Road for those accessing village facilities as there are no safe crossing points
- development inappropriate to that of land abutting the countryside
- impact on village infrastructure particularly health provision
- type and density of housing mix not in accordance with the Neighbourhood Plan findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people.
- cost of affordable homes for local residents – the application fails to take into account the District Wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

In summary, whilst the Neighbourhood Plan Team recognises the need for future development to take place within Thurston and acknowledges the need for a new Primary School, it does not support the application in its present guise for the concerns outlined above. Furthermore, whilst recognition is given to the ability to have an all through school site, there is a need for further investment in highways, road and traffic calming schemes to ensure that such a proposal provides a safe and secure environment for all.

Moreover, given the scale of proposed housing development, the Neighbourhood Plan Team would ask that the Parish Council requests that the District Council adopts a cohesive approach that looks at the totality of the applications submitted and their impact on all of Thurston's infrastructure and social development.

Yours faithfully,

Victoria S Waples

Victoria S Waples, BA (Hons), CiLCA
Secretary to Thurston Neighbourhood Plan Team

Your ref: 4963/16
Our ref: 00032802
Date: 07 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Dylan Jones
Planning Department
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

Dear Dylan,

Re: Thurston, Land west of Ixworth Road - Outline Planning Applications sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School

There are now five live applications for planning permission on sites in Thurston. In view of these applications which add up to over 800 dwellings it is clear that the County Council needs to consider the cumulative impact implications on highways and education infrastructure in the locality.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Planning Section, Strategic Development, Resource Management

cc Neil McManus, SCC

From: Peter Freer

Sent: 07 February 2017 .15:26

To: Planning Admin

Cc: Neil McManus; Philip Isbell; Christine Thurlow

Subject: Thurston, Land west of Ixworth Road - Outline Planning Application sought for up to 250 new dwellings - 00032802 - 4963/16

FAO Dylan Jones

Dear Dylan,

Please find attached Suffolk County Council's response to the above application where we will need to further consider the cumulative impact implications of development in this locality.

Kind regards,

Peter

Peter Freer MSc MRTPI

Senior Planning and Infrastructure Officer

Planning Section

Strategic Development – Resource Management

Suffolk County Council | 5th Floor | Endeavour House | 8 Russell Road | Ipswich |

IP1 2BX

From: RM PROW Planning
Sent: 13 February 2017 11:47
To: Planning Admin
Cc: Claire Dickson; aimee.fowler@bldwells.co.uk
Subject: RE: Consultation on Planning Application 4963/16

Our Ref: W523/018/ROW972/16

For The Attention of: Dylan Jones

Public Rights of Way Response

Thank you for your consultation concerning the above application, sorry for our late response.

Government guidance considers that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and local planning authorities should ensure that the potential consequences are taken into account whenever such applications are considered (Rights of Way Circular 1/09 – Defra October 2009, para 7.2) and that public rights of way should be protected.

Public Footpath 18 is recorded through the proposed development area.

We do not have **any objection** to this proposal and request the following condition is implemented.

Condition: The applicant/agent must ensure any proposed hedging/vegetation alongside the public footpath is set back a clear 1m from the edge of PROW, which has legal width of 1m. The hedging/vegetation must not encroach onto the PROW and will be the responsibility of the occupant/owner to maintain.

Reason: In the interests of the amenity of the public; the full legal width of the Public Right of Way must be kept clear of the hedging/vegetation so as to not obstruct the PROW.

Informative Notes:

Please note that the granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates.

Nothing should be done to stop up or divert the Public Right of Way without following the due legal process including confirmation of any orders and the provision of any new path. In order to avoid delays with the application this should be considered at an early opportunity.

The alignment, width, and condition of Public Rights of Way providing for their safe and convenient use shall remain unaffected by the development unless otherwise agreed in writing by the Rights of Way & Access Team.

Nothing in this decision notice shall be taken as granting consent for alterations to Public Rights of Way without the due legal process being followed. Details of the process can be obtained from the Rights of Way & Access Team.

"Public Rights of Way Planning Application Response - Applicant Responsibility" is attached for the applicant.

Regards

Jackie Gillis

Green Access Officer



Access Development Team

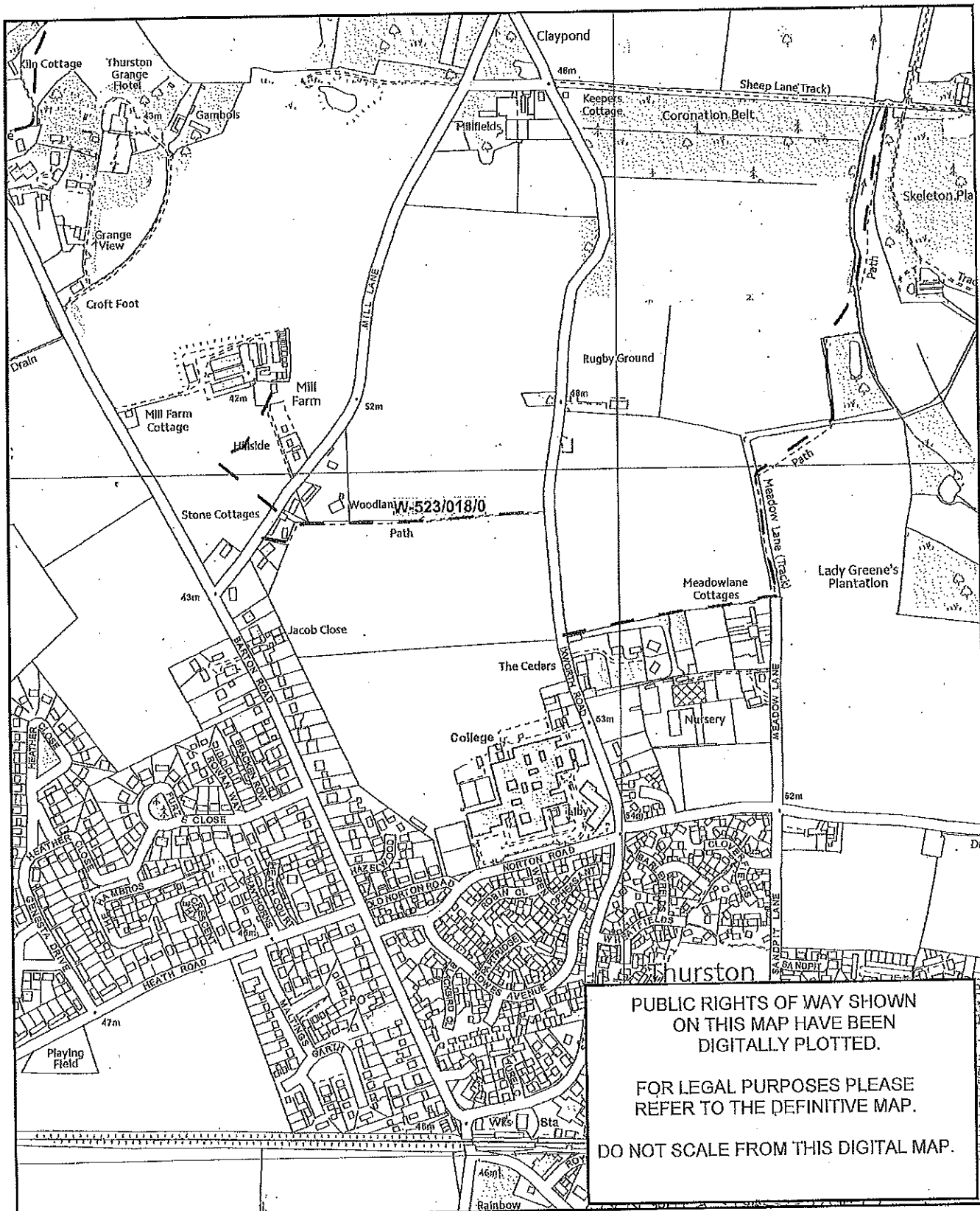
Rights of Way and Access

Resource Management, Suffolk County Council

Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

 <http://www.suffolkpublicrightsofway.org.uk/> | [Report A Public Right of Way Problem Here](#)

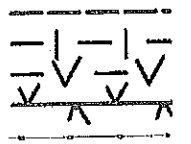
For great ideas on visiting Suffolk's countryside visit www.discoversuffolk.org.uk |  



4963/16 Land west of Ixworth Road, Thurston
 Public Footpath 18



Resource Management
 Endeavour House, 8 Russell Road, Ipswich, Suffolk. IP1 2BX



Ordnance Survey MasterMap

- Public Footpath
- Bridleway
- Restricted Byway
- Byway
- Definitive Map Parish Boundary

Scale 1:7500



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Date: 13/02/2017

From: Linda Harley [mailto:harley.parish@btinternet.com]
Sent: 14 February 2017 14:43
To: Planning Admin
Subject: Response to planning application

Gt Barton Parish Council objects to the following planning application for the reasons given below:

Land West of Ixworth Road, Thurston - 4963/16

Gt Barton uses the services available in Thurston and will be directly and adversely impacted upon by any pressures on local facilities as a result of this and other proposals in the village. The Parish Council remains concerned about the cumulative impact of these proposals for residential development in Thurston and expects the LPA to fully consider this before determining this proposal. They are especially concerned about the impact of additional traffic on the Bunbury Crossroads and expects the LPA to ensure that this impact is properly assessed and considered. This crossroads is already congested and requires urgent work to address existing capacity and road safety issues. Committed development in the local area is yet to be delivered and will exacerbate these existing issues. These committed proposals must be taken into account alongside the impact of this and other proposals, in Thurston.

Furthermore, the proposed education provision as part of this proposal does not include any commitment from the education providers and as such the impact of this proposal on education provision is unclear.

Gt Barton Parish Council notes that the infrastructure improvements could be funded through the CIL payments liable for this site. They expect the LPA to ensure that projects are already in place to receive this funding and so ensure that infrastructure impacts are appropriately mitigated. If this cannot be confirmed, we expect the LPA to seek infrastructure improvements via other sources, e.g. S106 obligation.

Linda

Mrs Linda Harley (CILCA)
Parish Council Clerk and Responsible Financial Officer



Consultation Response Pro forma

1	Application Number	4963/16 Ixworth Road, Thurston	
2	Date of Response	17.2.17	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<ol style="list-style-type: none"> 1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because it would erode the rural setting of the listed farmhouse; the level of harm is considered low. 2. The Heritage Team recommends that in accordance with NPPF, the low harm should be weighed against any public benefits of the scheme, which may include meeting housing provision targets and economic stimulus. 	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>The site is an area of undeveloped agricultural land between Mill Lane and Ixworth Road to the north of Thurston Community College. To the west of Mill Lane stands Mill Farmhouse, listed grade II. Mill Lane is lined on the east by detached dwellings reaching just beyond the access to Mill Farmhouse. Three further detached dwellings stand along the farm access, almost joining the farmhouse to the settlement with continuous development. The farmhouse itself is somewhat secluded by trees and other planting, with an extensive range of farm-buildings of industrial character to its north.</p> <p>Surrounding agricultural land will always make a considerable contribution to the appreciation of the significance of a historic farmhouse. In the case of Mill Farmhouse, this contribution is compromised by the modern farm-buildings and the modern residential development which almost reaches its door.</p> <p>The proposal would extend built development further along Mill Lane, although in a limited degree of arc in relation to remaining farmland. In this sense the proposal would represent some degree of harm to the setting of the listed farmhouse. However, in the light of the existing compromises to the building's setting, and the remaining extent of farmland around the farmhouse, the level of harm is considered low.</p> <p>The NPPF expects great weight to be given to the</p>	

Please note that this form can be submitted electronically on the Councils website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Councils website and available to view by the public.

		conservation of designated heritage assets and their settings; any harm requires clear and convincing justification, and should be outweighed by public benefits.
6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate	
7	Recommended conditions	

Please note that this form can be submitted electronically on the Council's website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed form will be posted on the Council's website and available to view by the public.

PARISH COUNCIL

Comments from: Thurston Parish Clerk

Planning Officer: Dylan Jones

Application Number: 4963 / 16

Proposal: Outline Planning Applicationsought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

Location: Land west of Ixworth Road, Thurston IP31 3PB

PLEASE SET OUT ANY COMMENTS AND OBSERVATIONS OF YOUR COUNCIL WITH REGARD TO THE ABOVE, BEARING IN MIND THE POLICIES MENTIONED IN THE ACCOMPANYING LETTER.

The Parish Council, having considered this proposal, would like to register its objection to the application and asks that the attached letter be read as explaining the reasons behind its objection.

For Planning Applications only

Support

Object

No Comments

..... Mrs V S Waples (Print Name)

on behalf of Thurston town/parish council

Dated..... 14.02.2017

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

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



SENT AS AN E-MAIL

Mr. P Isbell
Corporate Manager – Development Management
MSDC
131 High Street
Needham Market
IP6 8DL

February 14th 2017

Dear Mr. Isbell,

Proposal: Planning Application 4963-17 – Outline Planning Permission sought for up to 250 dwellings, open space and associated infrastructure, up to 2.4HA of land for Thurston Community College, 2ha of land for the provision of a new primary school, including details of access on land west of Ixworth Road, Thurston

Case Officer: Dylan Jones

The Parish Council wishes to place on record that it objects to this proposal in its current form and that the proposal is considered not to form a sustainable development within the dimensions set out in the NPPF.

The following reasons should be considered and form the basis for the objection:

The site and surrounding area are within the countryside and significantly outside of any settlement boundary for Thurston as defined by Mid Suffolk's Local Plan and would result in the development of new dwellings that would be visually, physically and functionally isolated from the facilities and services offered by Thurston as a Key Service Centre. At this point development of the site would significantly change the character of the village which is currently rural and would therefore not only be contrary to GP1 – Design and Layout of Development but also be contrary to csfr-fc2 provision and distribution of housing and cor2 development in the countryside and countryside villages. The setting of a large development to the north of the village in an area where there are currently very few dwellings; no street lights or signage or no pathways will not only fail to maintain and/or enhance the character and appearance of the surrounding area but will also fail to respect the scale and density of surrounding development.

Such a development will harm the character and appearance of this open area and will be contrary to Policy CS5 of the Core Strategy, Policy FC1.1 of the Core Strategy of the Mid

Suffolk Core Strategy Focus Review (2012) and saved Policies H13 and H16 of the Mid Suffolk Local Plan. Furthermore, it is felt that the development fails to ensure that it reflects the local character and identity of the area immediately surrounding the proposed development and is therefore inconsistent with paragraph 58 of the NPPF and that the application, if approved will fail to consider the loss of permanent pastureland, will fail to protect the wildlife habitats at this point in the village and will be contrary to policy CL8 – protecting Wildlife Habitats.

The Parish Council therefore holds that the application submitted is not sympathetic to the countryside in which it is situated and that it fails to protect the intrinsic character of the countryside by the density and mix of properties being proposed. The proposed development is situated in an area that has significant links with the wider countryside and a well-used footpath network and the Parish Council is concerned and echoes the concern raised by the Bury St Edmunds Ramblers Association that the public right of way linking Ixworth Road to Mill Lane will be "adversely affected by the loss of open space and the amenity presently enjoyed by both local residents and other walkers alike. This public footpath is part of a well-used network and gives easy access to the countryside around the village. This overdevelopment will alter the character of the north side of the village and diminish the enjoyment of a walk in the countryside".

The Parish Council feels that the application fails to consider policy cor9 (cs9 density and mix) and fails to demonstrate that it has achieved a mix of house types, sizes and affordability to cater for accommodation needs. Furthermore, the Parish Council is concerned that the Masterplan is an unimaginative off the shelf design and that it fails to show any respect for the fact that it will abut countryside on all sides. It was felt that the masterplan was more in-keeping with an urban edge of town design than that which would reflect the rural state of Thurston as a village. The Parish Council does not consider 3 storey dwellings to be in-keeping with the general characteristic of a rural village. Whilst it is acknowledged that Policy CS9 recognises that housing sites may range from town to village, all applications for housing should be expected to respect the traditional form of development rather than follow a standardised suburban form of development. The Parish Council is concerned that the application submitted fails to show that it has considered the current mix of housing within the village of Thurston and that it fails to have taken account of the findings of tenure type and mix within the Neighbourhood Plan consultations, nor the findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people. The Parish Council is also concerned that the application fails to take significant regard for the District wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

The Parish Council would also recommend that Highways be consulted as to the suitability of the location of the site; the access roads leading to the development; pedestrian safety with regards to access to the site and significant crossing points within the village. Of significant concern is the one single access off Ixworth Road which is a rural road unsuitable for the increase in traffic that will be generated. It is also noted that there is to be an emergency exit/entrance off Mill Lane. The Parish Council is concerned that the application fails to take account of the Suffolk Design Guide (para 3.13.2) which states that "if a site is approached from a small land or street than the scale of any new road and hence scale of development should reflect this... sites for development should be broken down into smaller residential neighbourhoods to minimize the use of Local Distributor Roads". The Parish Council considers that the application fails to consider the current road infrastructure and the fact that the secondary emergency access is to be off a single carriageway country lane (Mill Road).

The Parish Council would like reassurance that Suffolk Fire and Rescue are consulted on the risk of obstruction of not only the single access but also the feasibility of having an emergency access from a single carriageway.

The Parish Council is concerned at the proposal, as stated in the Residential Travel Plan, to have a direct vehicular access to the primary school land for pupils and parents from within the residential area, not directly off Ixworth Road. It is stated that the aim would be to insulate Ixworth Road against school drop off/pick up and to serve to deter local parents from off-site making short trips to/from the school by car. The Parish Council feels that the proposal to access the primary school from within the confines of the development will be unsustainable in ensuring that the area is safe for all to use. The Parish Council furthermore has concerns over the single access being proposed from Ixworth Road and feels that this also fails to follow Planning Guidance which states that streets should be designed to support safe behaviours, efficient interchange between travel modes and the smooth and efficient flow of traffic. The transport user hierarchy should be applied within all aspects of street design – and should consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, 'specialist vehicles like ambulances and finally other motor vehicles.

The Parish Council notes that within the Residential Travel Plan it is stated that 'the extension of the 30mph speed limit is proposed in conjunction with the proposed development to cover the entire Ixworth Road frontage of the scheme and up to the existing Rugby Club'. It is noted that the County Council has a 'speed limit policy' and the Parish Council would have concerns as to whether any assurances could be had that a revision to the 30mph speed limit would be agreed.

It is also felt that the development would not support the transition to a low carbon future and is unable to meet the environmental dimension of sustainable development and would be contrary to paragraph 17, 30, 35 and 55 of the NPPF and Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review.

Furthermore, the Parish Council is concerned at the impact that will be had by the location of a site for 250 houses and a 420+ pupil primary school with regards to road safety. The increased traffic that this development will produce will have a detrimental impact on Ixworth Road and it is felt that insufficient detail has been given to ensure that, with reference to NPPF paragraph 32 'safe and suitable access can be achieved for all people.' The Parish Council would ask that Highways be asked to comment on the suitability of two site entrances situated close to one another. The Parish Council is concerned that very little assessment has been carried out on the impact of vehicular movements on the entrance and that consideration should be given to the dangers associated with vehicular and pedestrian movements close to the single entrance to the proposed primary school.

The Parish Council is also concerned that the development of the site will not be able to allow for the convenient integration of public transport within the site and that the traffic that will be generated will not be able to be accommodated on the existing road network (CS6 – services and infrastructure). The Parish Council feels that given the remote location of the site, a reliance on the private motor car will be generated in order to access amenities and services within the village which will also be contrary to the sustainability objectives of Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012) and the NPPF paragraphs 14, 17, 55 and 56 and will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway

bridge crossings on Barton Road, the Priority System on Thedwastre Road; junction of A143 at Thurston Road, Great Barton and entry and exit points onto the A14.

Of equal concern, are the drainage issues at Ixworth Road and Old Norton Road. Whilst the former is acknowledged within the planning application submitted, the Parish Council is concerned that there are no solutions as to how to deal with the issue of water volumes due to the hard surfacing that will arise from the development of this site. The Parish Council has had considerable communication with Suffolk County Council over several recorded flood incidents close to the proposed site on Barton Road and Old Norton Road. The Parish Council would like to see some mitigation as to the problems that currently arise with water flow and that the surface water drainage system should be so designed to ensure that properties surrounding the development site are not impacted. It is further noted that RM Floods Planning has also stated that infiltration tests where the land allocated for the primary school is illustrated to be are just marginally acceptable. The Parish Council feels that 'marginally acceptable' requires further analysis and expects that this will be taken on board.

The Parish Council, until the Order for the Neighbourhood Plan is laid, is expected to respond to current planning applications in line with policies set out in the Mid Suffolk Local Plan. It is recognised and understood that, as defined by Mid Suffolk's Local Plan, Thurston is a Key Service Centre and growth is assumed to be in line with current policy. Policies cor1 (cs1 settlement hierarchy) and cor2 (CS2 development in the countryside and countryside villages) have been considered in the Council's response to this application. It cannot be disputed that Thurston has a settlement boundary and as such the location of this site is outside of that boundary and apart from one very small corner, cannot be acknowledged to be adjacent.

The Parish Council has not only looked at current policy, but has also taken on board views of the members of the public who attended the Planning Committee Meeting held to discuss this application amongst others as well as those of the Neighbourhood Plan Team who are in the process of undertaking a Neighbourhood Plan for Thurston.

The Neighbourhood Plan Team reports to the Parish Council on a regular basis and all Parish Councillors are fully aware and in agreement with the views of the Neighbourhood Plan Team, some of whom are indeed both Parish Councillors and Neighbourhood Plan members. The Parish Council has received correspondence from the Neighbourhood Plan Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that they are to be included within its submission. It is known that that letter was submitted to the Planning Department at Mid Suffolk on 3rd February and its contents should be taken as being fully endorsed by the Parish Council.

The Parish Council would further wish to reiterate the concerns of the Thurston Neighbourhood Plan Team with regards to the speed at which this and other applications have been submitted for new housing in the village. It is recognised within the village that as a Key Service Centre the village of Thurston will appeal to developers and that a certain amount of growth is desirable and non-objectionable, however the Parish Council is concerned that piecemeal development will have a negative impact on the current infrastructure and that there should be a strict control over new housing proposals and the associated numbers until the general infrastructure of Thurston and the surrounding areas has been given time to absorb new residents and the impacts that this associated growth will have on a rural village.

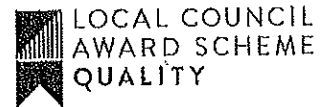
As such, the Parish Council formally requests that there is a change to the process and approach undertaken by the District Council in dealing with this and the other significant planning applications before it and that they are considered in a holistic manner with the impact from all development being considered once a thorough and engaging review has been undertaken with all the service providers to include NHS England; Education, Highways and Transportation Providers.

As confirmation, whilst the Parish Council recognises from conversations held with SCC Educational and Infrastructure Officers that a new primary school is required prior to any further growth within Thurston, it does not support the current application that has been submitted for this site. It is felt that the proposal for a primary school and 250 dwellings will intrude into an area of currently open, undeveloped, countryside resulting in an encroachment of built development extending significantly beyond the settlement boundary of Thurston.

Yours sincerely,

Victoria S Waples

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



Your ref: 4963/16
Our ref: Thurston – land west of
Ixworth Road 00032802
Date: 20 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

Mr Dylan Jones,
Planning Department,
Mid Suffolk District Council,
Council Offices,
131 High Street,
Needham Market,
Ipswich,
IP6 8DL

Dear Dylan,

Thurston: land west of Ixworth Road – developer contributions

I refer to the outline planning application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £54,000 towards libraries provision.

This consultation response mainly deals with the need to address early years and education mitigation directly arising from the cumulative impacts of developer-led housing growth in Thurston. The County Council's view is that appropriate mitigation from each of the 'live' planning applications should be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In those instances in which planning obligations are sought by Suffolk County Council they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published 123 Infrastructure List.

I set out below Suffolk County Council's response, which provides the infrastructure

requirements associated with this planning application and this will need to be considered by Mid Suffolk District Council. This consultation response considers the cumulative impacts on education arising from existing planning applications which, when including the 250 dwellings from this proposed development, amount to a total of 827 dwellings.

The County Council recognises that the District currently do not have a 5 year housing land supply in place, which means that paragraph 49 of the NPPF is engaged which in turn relies on paragraph 14 whereby the presumption is in favour of sustainable development. This is seen as the golden thread running through plan-making and decision-taking.

The National Planning Policy Framework (NPPF) paragraph 204 sets out the requirements of planning obligations, which are that they must be:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

The County and District Councils have a shared approach to calculating infrastructure needs, which is set out in the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk'.

Mid Suffolk District Council adopted their Core Strategy in September 2008 and Focused Review in December 2012. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 6 seeks to ensure provision of adequate infrastructure to support new development; this is implemented through Policy CS6: Services and Infrastructure.
- Policy FC1 and FC1.1 apply the presumption in favour of sustainable development in Mid Suffolk.

Community Infrastructure Levy

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

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

- Provision of passenger transport

- Provision of library facilities
- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

As of 06 April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy.

The requirements being sought here would be requested through S106A contributions as they fall outside of the adopted 123 list.

The details of specific S106A contribution requirements related to the proposed scheme are set out below:

- 1. Education.** NPPF paragraph 72 states 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

The NPPF at paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

School	Capacity			Actual/Forecast Pupl. Numbers					
	Remaining	95%	empties	Total	2016-17	2017-18	2018-19	2019-20	2020-21
Thurston CE Academy	210	200		200	196	211	212	208	208
		0		0					
Ixworth Free School (11 - 16)	697	687	0	567	271	300	342	350	344
Thurston Community College (11 - 16)	1500	1425	0	1,425	1,581	1,599	1,585	1,547	1,547
11-16 total places	2097	1992		1992	1,832	1,898	1,927	1,897	1,891
Thurston Community College (with Sixth Form)	1940	1,843	0	1,843	1,828	1,849	1,882	1,872	1,868

School level	Minimum pupil yield	Required
Primary school age range, 5-11:	62	62
High school age range, 11-16:	44	0
Sixth school age range, 16+:	9	0

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

Primary School

SCC forecasts show that there will be no surplus places available at the catchment primary school to accommodate any of the pupils anticipated to arise from this proposed development. The Primary School site is landlocked and cannot be permanently expanded.

The County Council has been in discussions with the Parish Council regarding the emerging Thurston Neighbourhood Plan and has provided pupil yields and possible strategies to deal with mitigation from the growth scenarios being assessed.

For a number of compelling reasons including improving education attainment, community cohesion and sustainability the highly preferred outcome is for those primary age pupils arising from existing and new homes within the community to be able to access a primary school place in Thurston. Where pupil bulges are anticipated the County Council will consider the provision of temporary classrooms but such an approach is only viewed as an interim measure if the longer term pupil forecasts indicate the need for permanent provision (by way of school expansion or a new school). Only as a last resort will the County Council consider offering places to pupils at out of catchment schools but this is seen as a far from ideal strategy and should only be considered for a very temporary period because there are a number of significant dis-benefits including negative impacts on education attainment, community cohesion, sustainability and costs. It is for the District Council to weigh up these important matters in considering the planning balance when deciding whether to allow or refuse planning permission.

Regarding out of catchment schools, major studies have shown that each transfer can result in a 6 month dip in standards as a minimum. 40% will eventually recover but 12% of pupils suffer long term negative effects. 2-tier pupils always out-performed 3-tier pupils at GCSE in the past and whilst the additional transfer

isn't the only reason it does have a negative effect.

The Policy Development Panel for School Organisation Review recommended at the start that any proposal should:

- 1) Ensure a single line of accountability for each key stage and
- 2) Minimise the number of points of transfer from one school to another within the statutory age range

This was the reason why the final decision was made to close the middle schools.

In addition to the above a lot of work is involved in transferring a pupil cohort from one school to another. There's the preparation and handover of pupil records to ensure the new school is made aware of each child's history, progress, health, needs and other agencies' involvement etc... to ensure continuity of their learning. There's also the pastoral care of all children so they feel comfortable with the change. Vulnerable and looked after children and those with SEN and behaviour difficulties and their parents have to be supported particularly sensitively and this could involve anything from regular visits to the school to staff working across the two schools for a period of time.

Due to the current uncertainty over the scale, location and distribution of housing growth in the Thurston locality it is not clear at this point in time whether the most sustainable approach for primary school provision is to:

- a. Retain a single primary school for the village by relocating and delivering a new larger school; or,
- b. Retain the current primary school and deliver a second (new) primary school for the village.
- c. Whichever strategy is the most appropriate a site of a minimum size of 2.2 hectares will need to be identified and secured. A new 420 place primary school is currently estimated to cost at least £6.9m to build (excluding land costs).
- d. In the short term the head teacher has agreed to the siting of a temporary double mobile classroom for 60 pupils. However this is strictly on the understanding that such mitigation is only of a limited and temporary nature ahead of determining either a. or b. above.
- e. Section 106 developer funds will be sought to pay for the above. This is on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for land

and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 50 primary age pupils forecast to arise from the proposed development is calculated as follows

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- £6.9m/420places = £16,429 per pupil place
- From 250 dwellings it is forecast that 62 primary age pupils will arise
- Therefore 62 pupils x £16,429 per place = **£1,018,598 (2016/17 costs)**

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £543,620 for a 2.2 hectare site and equates to £1,294 per pupil place. For the proposed development, this equates to a proportionate land contribution of 62 places x £1,294 per place = **£80,228**. However as this proposed development, if granted planning permission, will include a fully serviced site for the new primary school which is to be transferred to Suffolk County Council, this will result in the payment of a maximum contribution to the applicant of £100,000 per acre less the proportionate land contribution cost of £80,228 directly arising from this proposed development.

It is proposed that the school site can be separately accessed and serviced directly off Ixworth Road, so that the school delivery is not dependent on the housing delivery. An important issue to resolve will be delivering sustainable and safe walking & cycling routes to the new school. In this respect further discussions are needed regarding the delivery of a new footway/cycleway on Thurston Community College land along Ixworth Road to directly serve the primary school site and housing site.

In addition the freehold of 2.4 hectares of land is to be transferred for £1 to SCC for the benefit of Thurston Community College.

At present two planning applications (under references 5070/16 and this one 4963/16) include land identified for education use but planning permission for neither site has been granted permission by Mid Suffolk District Council. It is therefore suggested that consideration be given to imposing an appropriate planning condition restricting occupation of any dwellings once the capacity of the existing primary school with additional temporary classroom are full. This condition can be discharged once construction of the new primary school has commenced. This recognises the importance that the Government attaches to education provision as set out in paragraphs 38 and 72 of the NPPF.

Temporary classroom costs

The physical constraints of the existing primary school site mean that a permanent expansion of the school is not possible. Therefore temporary arrangements will need to be put in place to accommodate the additional pupils arising from new homes.

The DfE publishes Area Guidelines (Building Bulletin 103) for schools which define the minimum areas of school buildings, playing fields, site etc. Thurston Church of England Primary Academy is on a very small site with no possibility of expanding its boundary. It has a capacity of 210 places (1 form of entry) so according to the guidelines its minimum site area (including playing fields) should be 11,220 sq m. It has a site area of 11,169 sq m including a proportion of the adjacent village field (managed by the Village Playing field Trust) and is therefore below the minimum site area for a school of this capacity. Therefore, no more accommodation technically can be added to the school and no money will be spent on any permanent accommodation. However schools can take on extra pupils arising as a "bulge" by providing temporary classrooms. This might happen if there is a sudden spike in the local population, or as in this case, due to new housing developments providing it is only temporary until permanent places are provided elsewhere like a new school.

The Primary School does not have its own grass playing field. It is allowed to use the adjacent playing field owned and managed by the Trust. The school agrees only to use half of it. Installing a double mobile (providing 60 places) may mean it is located on an area of hard play which would reduce the area of playing field available to the increased number of pupils. So in absolute and relative terms the area of playing field would reduce i.e. more pupils at the school sharing less outdoor play area. It is therefore preferable to locate a temporary classroom on non-playing field land within the school site, such as part of a car park.

A Feasibility Study has been commissioned to assess whether the existing school site has space to accommodate this temporary expansion and it has confirmed it is possible.

As an Academy the County Council has limited control over their decision whether or not to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would have limited powers to impose this on them. Iain Maxwell (Assistant Senior Infrastructure Officer in SCC's, Children and Young People Service) met with the Head teacher and 3 Governors on Thursday 26th January 2017 to explain the situation. Although there were reservations from the school the overall response was to accept in principle the installation of the temporary classroom if it was needed, providing there was evidence that the new school would be built and

open in the early stages of the housing developments to minimise the length of time the temporary building would remain on site. Formal acceptance in writing from the school has now been received.

Providing temporary accommodation on the primary school site (a double mobile) would cost approximately £250,000 (including installation) which we expect to be on site for 2-3 years but this is dependent on construction commencing on the new school early on. The costs between renting and buying are comparative. Should developers prefer to rent and pay for installation and removal costs this is acceptable to SCC, and an ongoing rental charge/obligation can be included in the Section 106 agreement. At this stage SCC doesn't know how many additional houses the District Council or Parish Council anticipates for the village or when they will be occupied, but we do know the school cannot cope without this double mobile. Even then this will only accommodate 60 pupils, i.e. approximately 240 dwellings and there are more than this number in the current undetermined applications for planning permission. The District Council will need to consider whether a planning condition to restrict occupation until permanent primary education provision is available locally that is an acceptable solution to support further development once the temporary provision places are used up by additional development.

The proportionate temporary accommodation contribution is calculated as follows:

- Cost of a temporary accommodation £250,000
- Cost per place = $£250,000/60 = £4,167$
- Primary age pupils arising from this site is 62
- Proportionate contribution towards temporary classroom is 62 pupils x $£4,167$ per place = £250,000 (maximum cost)

The temporary classroom cost of £250k will be apportioned across all developments that secure planning permission, based on dwelling occupations/pupils arising from each scheme up to the maximum of £250k/60 pupils. The planning obligation will need to be worded in such a way for each scheme that the maximum they will pay will be based on total pupils arising and/or limited to the 60 places. In theory the 5 schemes could proportionately split the £250k cost but have a dwelling occupancy restriction once the 60 places have been used up; or any combination of circumstances which may arise.

Secondary Schools

The catchment secondary schools are Ixworth Free School and Thurston Community College. Thurston Community College has the largest secondary school catchment area in Suffolk. At present there is forecast to be sufficient

surplus places available for pupils forecast to arise from the proposed development, with any expansion projects currently falling under CIL.

However against the anticipated level of housing growth across the wider area a full assessment of secondary school requirements is in the process of being analysed, but the initial view is that in due course a new secondary school will be needed. The best estimate of current cost is in the region of £25m, with a site of 10 hectares.

2. **Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. The Childcare Act in Section 7 sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

Through the Childcare Act 2016; the Government will be rolling out an additional 15 hours free childcare to eligible households from September 2017.

At present, in the Thurston area, there are four settings that offer places (2 childminders, Thurston Preschool and Tinkerbells Day Nursery). From a development of 250 dwellings, the County Council anticipates around 25 pre-school pupils eligible for funded early education. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 25 children of the total 60 who would be accommodated within the new setting, could be calculated as follows (revised costs from a similar scheme in Suffolk):

- £500,000 construction cost (including land as collocated with the new primary school) for a new 60 place setting
- £500,000/60 early years pupils = £8,333 per place
- From 250 dwellings there is the need for 25 additional places
- Therefore 25 pupils x £8,333 per place = **£208,325 (2016/17 costs)**

3. **Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
- b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

4. **Transport issues.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Steve Merry/Christopher Fish of Suffolk County Highway Network Management.

In its role as Highway Authority, Suffolk County Council has worked with the local planning authorities to develop county-wide technical guidance on parking in light of new national policy and local research. This was adopted by the County Council in November 2014 and replaces the Suffolk Advisory Parking Standards (2002).

5. **Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Mid Suffolk housing team to identify local housing needs.

6. **Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

On 18 December 2014 the secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that in considering:

"local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate."

The changes set out in the MWS took effect from 06 April 2015.

- 7. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fire safety in dwelling houses and promote the installation of sprinkler systems and can provide support and advice on their installation.

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

- 8. Superfast broadband.** SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion; it also impacts educational attainment and social wellbeing, as well as impacting property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

9. Legal costs. SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

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

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 and 123 Regulations.

I would be grateful if the above information can be presented to the decision-taker. The impact on existing infrastructure as set out in the sections above is required to be clearly stated in the committee report so that it is understood what the impact of this development is. The decision-taker must be fully aware of the financial consequences.

Yours sincerely,

P J Freer

Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Strategic Development – Resource Management

cc Neil McManus, SCC
Iain Maxwell, SCC
Peter Robinson, Chairman - Thurston Parish Council
Christine Thurlow, MSDC
Steve Merry, SCC



Dylan Jones
Planning Department
Mid Suffolk District Council
131 High Street
Needham Market
IP6 8DL

Suffolk Wildlife Trust
Brooke House
Ashbocking
Ipswich
IP6 9JY

01473 890089
info@suffolkwildlifetrust.org
suffolkwildlifetrust.org

20/02/2017

Dear Dylan,

RE: 4963/16 Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for new Primary School, Inc. details of access. Land west of Ixworth Road, Thurston, IP31 3PB

Thank you for sending us details of this application, we have the following comments:

We have read the ecological survey report (Enims, March 2016) and we note the findings of the consultant.

Although no skylarks were recorded nesting on the site at the time of the ecological survey, this was carried out early in the season for this species. Dependent on the crop rotation, the application site is likely to provide suitable nesting habitat for skylark in some years. Loss of this site to development would therefore remove this nesting resource from that available in the area. Skylark are a UK and Suffolk Priority species and are on the 'Red' list of Birds of Conservation Concern (BoCC) due to population declines.

Compensation for the loss of suitable nesting habitat for this species must therefore be sought as part of this proposal. We would recommend that this is in the form of skylark plots (meeting the specification set out in Countryside Stewardship option AB4) on nearby arable land, these should be secured for a minimum of 10 years.

We note the consultant has recommended a sympathetic lighting scheme during construction. It is important that all retained and new habitat features are not impacted on by light spill from external lighting and that dark corridors are retained around the site for foraging and commuting bats. We recommend that Suffolk County Council's street lighting strategy is used as a basis for long term street lighting layout and design, alongside the recommendations made in the ecological survey report.

We note areas have been designated as green space with the provision of Sustainable Urban Drainage Systems, woodland and landscaping belts. We query how these areas will be managed to maximise their biodiversity value in the long term?

Notwithstanding the above, should development at this site be considered acceptable, we request that the recommendations made within the report are implemented in full, via a condition of planning consent. We also request that any development secures appropriate ecological enhancements as part of its design. This could include (but not be limited to) integrated nesting opportunities for birds such as swifts and house sparrows; integrated roosting opportunities for bats and hedgehog friendly garden boundaries.

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As this is an outline planning application, should consent be granted it must be ensured that any future reserved matters applications are informed by suitably up to date ecological information.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

Jill Crighton
Conservation Planner

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



21 February 2017

Dylan Jones
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich IP6 8DL

By email only

Dear Dylan

Application: 4963/16

Location: Land west of Ixworth Road, Thurston IP31 3PB

Proposal: Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

Thank you for consulting Place Services on the above application.

Holding objection: There is insufficient ecological information available to understand the likely impacts of development on Priority species, particularly skylarks.

The Preliminary Ecological Appraisal (PEA) (enims, March 2016) states that: *"During the field survey skylark was observed flying above the application site."*

As it is possible that skylark territories may be lost, and no further surveys recommended nor mitigation offered eg offsite nest plots on nearby arable land, a clarification of the likelihood of impact is required.

However the PEA also included the statement that;

"Due to the relatively small size of the development and the presence of these common habitat types in the surrounding landscape, the loss of these habitats from within the site, are not anticipated to affect the conservation status of these species beyond the context of the site"

All likely impacts on Priority species need to be considered (not just significant ones) so there is therefore a gap in information which needs to be filled before determination of this application.

This additional information is necessary to confirm the likely impacts on skylarks, and that any necessary mitigation measures have been secured eg 2 nest plots per pair of skylarks displaced or disturbed.

I look forward to working with the LPA and the applicant to provide the missing information to remove my holding objection. Please contact me with any queries.

Best wishes

Sue Hooton CEnv MCIEEM BSc (Hons)



Principal Ecological Consultant
Place Services at Essex County Council
sue.hooton@essex.gov.uk
07809 314447

Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Our Ref: 570/CON/4963/16
Date: 3rd April 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

NAME Mr Sperrin

ADDRESS Persimmon Homes Ltd
Persimmon House
Colville Road Works
Lowestoft
NR33 9QS

Dear Mr Sperrin

Interim Reply to Planning Application 4963/16 for up to 250 new dwellings, open space and associated infrastructure, up to 2.4HA of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

This letter is complimentary to that ref 570/CON/4963/16 dated 10th March 2017 which details Suffolk County Council's response to the cumulative effect that five developments in the parish of Thurston will have on the highway infrastructure. This letter details those additional issues which the Highways Authority has identified which are specific to this application.

Site Access

The proposed 2.4 x 59m visibility splays are not acceptable with current derestricted speed limit. The speed data presented in Transport Assessment states that the 85thile speeds are 46.1mph northbound and 40.9mph southbound. This would require 160m visibility splays. No swept path assessment has been provided to indicate that large vehicles can access and exit the junctions. Junctions, including those to the proposed primary school site shall be no closer than 50m apart. All junctions should provide pedestrian access and suitable crossing facilities.

The developer has proposed to extend the 30mph speed limit to Rugby Club. This would allow a reduction of the visibility splays but unless measures are in place to present an environment where the speed limit is self-enforcing an 85thile speed of 37mph should be assumed resulting in a 90m visibility (DMRB). It is considered that Manual for Streets guidance for visibility would only be applicable if the environment on Ixworth Road is modified to recreate a built rather than rural environment and hence modify driver behaviour. Note that until changes to the speed limit can be implemented the designer should assume the current measured speed data for design purposes. To implement a reduction of speed limit a legal process must be followed during which formal objections can be made that can result in the proposals being withdrawn.

The proposed emergency access via Mill Lane is acceptable provided;

- the length of the main access between Ixworth Road and the beginning of the loop road is kept to a minimum,
- details of the junction layout including swept path analysis show that this access is practical with regard to the narrow width of Mill lane,
- the emergency access is designed to be of a suitable width with features to effectively deter use by non-authorised vehicles while allowing pedestrian and cycle use.

Internal Highway layout

A carriageway width of 5.5m would be acceptable for the main access road. Details of the footway layout and shared space design will be required.

Footway and cycle connectivity

The proposal of a footway along the western side of Ixworth Road between Norton Road and the Rugby Club is welcomed. Confirmation is required that provision of the footway will not reduce the carriageway on Ixworth Road to an unacceptable width.

To improve pedestrian connectivity a pedestrian crossing should be provided at the junction of Ixworth Road, Station Hill and Norton Road.

An uncontrolled crossing should be provided to link the new footway alongside Ixworth Road to the PRoW Thurston 001 opposite.

The proposed footway as detailed includes provision of root barriers and 'no dig' construction. These are regarded as indicative and details will be agreed as part of the S278 approval process.

Public Rights of Way (PRoW)

Changes or additions to the existing PRoW network (eg spurs to the proposed school site) must be agreed with the relevant SCC PRoW Officer. Care should be taken not to create a canyon effect by confining footpaths between linear features such as walls, high hedges and fences. Some of the footways shown on drawing 03 Sketch Block Plan are within the existing or proposed adoptable highway and as such do not require PRoW status.

Car parking

Although details are not provided it is stated in the Transport Assessment that this will comply with SCC guidance.

Road Safety

The Transport Assessment does not refer to the cluster of crashes at the junction of C693 Thurston Road / C692 Thurston Road / C693 New Road. However, this has been addressed in the letter regarding the cumulative effects of the developments in Thurston.

Landscaping

When considering the masterplan for full planning application the developer should note the Highway Authority's preference for trees to be planted in public open space rather than adjacent to adoptable highways (including footways)

Transport Assessment and Local Highway Infrastructure

The trip rates calculated for this development are 0.568 (am peak) and 0.528 (pm peak). These are lower than adjacent developments in Thurston and surrounding villages but considered acceptable due to the proportion of affordable houses.

The TA does not address cumulative impact of other sites and does not include A143 Gt Barton and C693 Thurston Road / C692 Thurston Road / C693 New Road junction, which have been identified in other Transport Assessments as junctions that will receive additional traffic from this development and will then exceed theoretical capacity.

Proposed S278 works

- Footway on west side between Norton Road and Persimmon site and beyond to the Thurston Rugby Club

Proposed S106 Heads of Terms

- Improvements to PRow Thurston 001 between Meadow Lane and Ixworth Road
- Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction
- Contribution towards improvements at the A143 Bury Road / C691 Thurston Road / C649 Brand Road, junction at Great Barton
- Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road
- Contribution towards 40mph speed limit on the C692 Thurston Road as part of the above safety improvements
- Extension of the 30mph speed limit to Thurston Rugby Club

The S278 and S106 proposals are based on the assumption of a collaborative approach as outlined in our letter of the 10th March 2017. If this site is determined as a stand-alone application these conditions and contributions would be re-assessed.

Yours sincerely,



Steve Merry
Transport Policy and Development Manger
Resource Management

Sent: 25 April 2017 16:26

To: Dylan Jones

Subject: RE: Planning applications for 872 houses in Thurston

Dear Dylan, thank you for your enquiry. Of the 6 applications we only responded to 5070/16, the remaining applications had no environmental constraints in our remit.

Flood risk

None of the sites are in areas at risk of fluvial flooding. The assessment of risk of flooding from surface water is a matter for the lead local flood authority; Suffolk County Council.

Foul water disposal

According to our records there should be sufficient headroom within the Thurston Water Recycling Centre permitted Dry Water Flow to accommodate all 827 dwellings. It is important, however, that you consult Anglian Water as they are the only ones that can confirm whether the local foul sewers have sufficient hydraulic capacity.

The developers of each individual site should already have approached AWS with a Pre-development Enquiry. However, depending on the timing of those enquiries they may not have considered the cumulative impacts.

Water supply

Thurston lies in an area of water stress. Our standard water resources comments for this situation are below:

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

The development lies within the area traditionally supplied by Anglian Water Services Ltd. It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. You should seek advice from the water company to find out if this is the case, or a new source needs to be developed or a new abstraction licence is sought. We may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.

THE LOCATION OF DEVELOPMENT SHOULD TAKE INTO CONSIDERATION THE RELATIVE AVAILABILITY OF EXISTING DEVELOPED WATER RESOURCES

The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.

EVERY OPPORTUNITY SHOULD BE TAKEN TO BUILD WATER EFFICIENCY INTO NEW DEVELOPMENTS, AND INNOVATIVE APPROACHES SHOULD BE ENCOURAGED.

We support all initiatives aimed at reducing water use. The extent of water efficiency measures adopted will affect the demand for water for the development and we would expect that this will be taken into consideration. It is assumed that new houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. We support greywater recycling as it has the potential to reduce water consumption in the average household by up to 35% if achieved in a safe and hygienic manner.

It is the responsibility of the applicant to ensure that no local water features (including streams, ponds, lakes, ditches or drains) are detrimentally affected, this includes both licensed and unlicensed abstractions.

If the proposal requires an abstraction licence, it is recommended that the applicant contact our permitting centre. Depending on water resources availability a licence may not be able to be granted.

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

External 02 03 02 58389

Mobile 07845 875238

graham.steel@environment-agency.gov.uk

<https://www.gov.uk/government/organisations/environment-agency>

<https://www.gov.uk/flood-risk-assessment-for-planning-applications>

<https://www.gov.uk/flood-risk-assessment-local-planning-authorities>

Iceni House, Cobham Road, Ipswich, IP3 9JD

MID SUFFOLK DISTRICT COUNCIL

TO: Dylan Jones – Senior Planning Officer

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

Date: 15th May 2017

SUBJECT: Residential Development at land west of Ixworth Road, Thurston for 250 dwellings application No. M/4963/16.

Consultation Response on Affordable Housing Requirement

Key Points

1. Background Information:

- A development of 250 dwellings.
- This development triggers Local Plan Amended Policy H4 and therefore up to 35% affordable housing would be required on this site.
- Based on 250 dwellings 87 units of affordable housing would be sought. 87 affordable units have been included in the Design and Access statement submitted by Persimmon Homes.

2. Housing Need Information:

2.1 The Babergh and Mid Suffolk District Strategic Housing Market Assessment confirms a continuing need for housing across all tenures and a growing need for affordable housing. The most recent update of the Strategic Housing Market Assessment, completed in 2012 confirms **a minimum need of 134 affordable homes per annum.**

2.2 The most recent version of the SHMA specifies an affordable housing mix equating to 41% for 1 bed units, 40% 2 bed units, 16% 3 bed units and 3% 4+ bed units. Actual delivery requested will reflect management practicalities and existing stock in the local area, together with local housing needs data and requirements.

2.3 The Council's Choice Based Lettings system currently has circa. 980 applicants registered for the Mid Suffolk area.

2.4 At February 2017 the Housing Register had 19 applicants registered specifically for housing in Thurston and 17 of these had a local connection to the village. However as this is a planning gain site, it would be required to meet district wide need so the **980** figure is the one to be applied in this case.

2.5. It is considered good practice not to develop a large number of affordable dwellings in one location within a scheme and therefore it is recommended that no more than 15 affordable dwellings should be located in any one part of the development.

2.6. Our 2014 Housing Needs Survey shows that there is a need across all tenures for smaller units of accommodation, which includes accommodation suitable for older people, wishing to downsize from larger privately owned family housing, into smaller privately owned apartments, bungalows and houses.

2.7 It would also be appropriate for any open market apartments and smaller houses on the site to be designed and developed to Lifetime-Homes standards, making these attractive and appropriate for older people.

3. Affordable Housing Requirement for Thurston:

Affordable Housing Requirement	35 % of units = 87 affordable units
Tenure Split – 60% Rent & 40 % Intermediate e.g. New Build Homebuy accommodation, intermediate rent, shared ownership or starter homes.	Affordable Rent = 53 units All rented units will be let as Affordable Rent Tenancies Intermediate = Shared Ownership = 24 units Intermediate = Starter Homes = 13 units
Detailed Breakdown Rented Units	General Needs Affordable Dwellings: <ul style="list-style-type: none"> • 6 x 1B 2P houses @ 58 sqm • 6 x 1B 2P flats @ 50 sqm • 6 x 2B 4P flats @ 70 sqm • 4 x 2B 3P Bungalows @ 63 sqm • 22 x 2B 4P Houses @ 79 sqm • 7 x 3B 5P Houses @ 93 sqm • 2 x 3B6P Houses @ 102 sqm <p>Total = 53 ART's</p>
Detailed Breakdown Intermediate Units	General Needs Shared Ownership dwellings: <ul style="list-style-type: none"> • 4 x 2B 4P flats @ 70 sqm • 14 x 2B 4P Houses @ 79 sqm • 6 x 3B 5P Houses @ 93 sqm <p>Total = 24</p> <p>Starter Home Dwellings: -</p> <ul style="list-style-type: none"> • 4 x 2B4P flats @ 70sqm • 9 x 2B4P houses @ 76 sqm
Other requirements	Properties must be built to current Homes and Communities Agency Design and Quality Standards and be to Lifetimes Homes standards.

	<p>The council is granted 100% nomination rights to all the affordable units on first lets and at least 75% on relets.</p>
	<p>The Shared Ownership properties must have a 80% staircasing bar, to ensure they are available to successive occupiers as affordable housing in perpetuity.</p>
	<p>The Council will not support a bid for Homes & Communities Agency grant funding on the affordable homes delivered as part of an open market development. Therefore the affordable units on that part of the site must be delivered grant free.</p> <p>The affordable units delivered on the local needs part of the site will need further consideration regarding any grant application to the HCA and a support for grant cannot be guaranteed in this instance. It is recommended that RP partners consider this matter carefully.</p>
	<p>The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice.</p> <p>On larger sites the affordable housing should not be placed in groups of more than 15 units.</p>
	<p>Adequate parking provision is made for the affordable housing units</p>
	<p>It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see www.midsuffolk.gov.uk under Housing and affordable housing for full details.</p>

Julie Abbey-Taylor, Professional Lead – Housing Enabling.

Our Ref: 570/CON/4963/16
Date: 8th June 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

The Planning Officer
Mid Suffolk District Council
Council Offices
131 High Street
Ipswich
Suffolk
IP6 8DL

For the Attention of: Dylan Jones

Dear Dylan

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/4963/16

PROPOSAL: Planning Application 4963/16 for up to 250 new dwellings, open space and associated infrastructure, up to 2.4HA of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

LOCATION: Ixworth Road, Thurston, Suffolk

ROAD CLASS: C

This letter is complimentary to that ref 570/CON/4963/16 dated 10th March 2017 and 3rd April 2017 which details Suffolk County Council's response to the cumulative effect that five developments in the parish of Thurston will have on the highway infrastructure.

Notice is hereby given that Suffolk County Council as Highways Authority does not object subject to a S106 planning obligation to its satisfaction and the following conditions being applied to any permission granted to it.

Introduction

Planning applications have been submitted to develop five sites around the village of Thurston. It was recognised at an early stage by the Planning Authority and Highways Authority that collaboration between all parties could provide a more effective package of infrastructure improvements supporting these developments than could be obtained by treating each as an individual application. The proposed Highway Conditions and Obligations in this letter are a result of the collaboration between Developers, their Agents, the Local Planning Authority and the Highways Authority over a number of months. It is recognised that the measures will not resolve all transport issues in and around Thurston but are proportional to the scale of development and mitigate those issues that are considered through the data presented to be severe.

If one or more of the five sites are not granted approval by the Local Planning Authority it is strongly recommended that the conditions and obligations contained in this response are reconsidered so that they provide robust mitigation for the impact of those sites granted planning permission.

Site Access

1. Condition: No other part of the development shall be commenced until the new vehicular accesses have been laid out and completed in all respects in accordance with Drawing No. 06/011 Rev E and with an entrance width of 6.3 meters and been made available for use.
Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

2. Condition: Before the access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 120 metres in each direction along the edge of the metalled carriageway from the centre of the access (Y dimension) or tangential to the nearside edge of the metalled carriageway, whichever is the more onerous. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.

Comment: The visibility requirements are based on an extension of the 30mph speed limit north along Ixworth Road as listed in the proposed S106 obligations. If this obligation is removed the Highways Authority advise that the visibility requirements within Condition 2 are reconsidered.

3. Condition: The highway element of the development shall not commence until the Road Safety Audit (stages 1 and 2) process has been carried out in accordance with the Suffolk County Council Road Safety Audit Practice and Guidance and any necessary amendments or changes undertaken. The development shall not be [occupied / open for public access] until any requirements under stage 3 of the Road Safety Audit have been completed or a programme of remedial works has been agreed.

Reason: In the interests of highway safety to ensure the approved layout is properly designed.

4. Condition: No other part of the development shall be commenced until details of the emergency access off Mill Lane as shown on the indicative plan 06/013 Rev – are submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

5. Condition: No dwellings shall be occupied until the emergency access off Mill Lane is completed and available for use by emergency vehicles.

Reason: To ensure that a suitable alternative emergency access is available into the development.

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

Internal Highway layout

Note: The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

6. Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing, lighting, traffic calming and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of highway safety to ensure that roads/footways are constructed to an acceptable standard.

7. Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: In the interests of highway safety to ensure that satisfactory access is provided for the safety of residents and the public.

8. Condition: Before the development is commenced details of the areas to be provided for the manoeuvring and parking of vehicles including electric vehicle charging points, powered two vehicle provision, secure covered cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.

9. Condition: Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users in the interests of highway safety.

10. Condition: Before the development is commenced details shall be submitted to and approved in writing by the County Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway in the interests of highway safety.

11. Condition: Prior to the commencement of any part of the development details of the proposed tree planting and landscaping shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out as approved.

Reason: to ensure new trees are not planted close to roads and that they have an approved root direction system to prevent damage to the roads and footways and to ensure that visibility splays remain unobstructed by proposed planting.

Construction Management Plan

12. Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) details of proposed means of dust suppression
- h) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- j) monitoring and review mechanisms.
- K) Details of deliveries times to the site during construction phase

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

Footway and cycle connectivity

13. Condition: Construction of a metalled 3.0m (nominal width) footway / cycleway on Ixworth Road between the site entrance and Norton Road as shown on Drawings 06/011 Rev D and 06/12 Rev A. Where the footway lies without the current limits of the public highway the contractor shall arrange for adoption of these areas via the S38 process.

Reason: To provide pedestrian access between the site and the main village via Station Hill and to include all parts of the footway within the public highway.

14. Condition: Construction of a metalled 2.0m (nominal width) footway on Ixworth Road between the site entrance and Thurston Rugby Club as shown on Drawing 06/011 Rev D.

Reason: To provide pedestrian access between the main village and the Rugby Club and link the development with the wider PRow network.

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land

compensation claims, commuted sums, and changes to the existing street lighting and signing.

Public Rights of Way (PRoW)

Note: The public right of way Thurston Footway 18 cannot be lawfully driven along without due authority. This highway must remain unobstructed at all times. It is an offence to disturb the surface of the highway so as to render it inconvenient for public use. Therefore it is imperative that the surface is properly maintained for lawful use during the construction phase and beyond.

The Highway Authority will seek to recover the cost of any such damage which it actions for repair.

Comment: Changes to the alignment of, or additions to the existing PRoW network (eg spurs to the proposed school site) must be agreed with the relevant SCC PRoW Officer. Care should be taken not to create a canyon effect by confining footpaths between linear features such as walls, high hedges and fences.

Proposed S106 Highways Contributions

All contributions must be appropriately index linked. Any of the above contributions unspent or not committed 5 years following occupation of the final dwelling to be repaid.

1. Improvements to PRoW Thurston 001 between Meadow Lane and Ixworth Road. A contribution of £8889 is required on completion of 50% of the total number of dwellings.
2. Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction. A contribution of £27297 is required on occupation of the first dwelling.
3. Contribution towards improvements at the A143 Bury Road / C691 Thurston Road / C649 Brand Road, junction at Great Barton. A contribution of £86155 is required on commencement of construction work on site.
4. Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a 40mph speed limit on the C692 Thurston Road. A contribution of £15780 is required on commencement of the first dwelling.
5. Extension of the 30mph speed limit to Thurston Rugby Club. A contribution of £8000 is required on commencement of work on site.

The S106 proposals are based on the assumption of a collaborative approach as outlined in our letter of the 10th March 2017. If this site is determined as a stand-alone application these conditions and contributions would be re-assessed.

Travel Plan and S106 Contributions

The Residential Travel Plan (dated November 2016) that was submitted to support the application for the proposed 250 dwelling development in Thurston has identified some suitable measures and targets to mitigate the highway impact from the development. However there is some further work that will need to be done to the Travel Plan for it to be fully compliant with current planning guidance:

- The 384 and 385 bus services that serve within the vicinity of the proposed development would only be suitable for commuting to Bury St Edmunds for a typical 9am to 5pm shift. The times and frequencies would not be suitable for commuting to Stowmarket, which is an employment destination for residents of Thurston identified by the 2011 Census. There will need to be further reference in the Travel Plan on how this issue could be overcome.
- There must be a commitment included in the Travel Plan to fully implement and monitor the Travel Plan for a minimum of five years, or one year after occupation of the final (250th) dwelling, whichever is longest. This will ensure that if the development takes longer than five years to build-out the Travel Plan will continue to be implemented until full completion of the development. Also the baseline Travel Plan monitoring should commence on occupation of the 100th dwelling, as undertaking this monitoring on occupation of the 50th dwelling is unlikely to provide representative resident travel data for the site.
- A Full Travel Plan, that includes the site-specific baseline data and some revised measures should be submitted for approval on occupation of the 100th dwelling.
- The provision of a £100 public transport voucher is a good measure and welcomed by SCC. However there should be an option for the resident to receive an alternative cycle voucher of equivalent value if they feel that the public transport voucher would not be of benefit to them. This option will need to be included in the Travel Plan.
- The Welcome Pack should also offer a Personalised Travel Planning service to demonstrate all the sustainable transport options for each residents regular journeys (i.e. commuting).
- In regards to the proposed 'walking bus' measure to the local primary schools; has this been discussed with the existing primary school, as this measure is likely to require additional resource for the school? Evidence of the outcomes of the discussions with the school must be included in the Travel Plan.
- The 15% target for a reduction in single-occupancy vehicle travel is a good target. However on reviewing the supporting Transport Assessment (dated November 2016) there is no reference to the Travel Plan target being applied to reduce the highway impact generated by the development. This goes against the overarching principles in the "Travel Plans, Transport Assessments and Statements in Decision-taking" section of the 2014 Planning Practice Guidance. Therefore reference to the overarching of the Travel Plan and Transport Assessment will need to be applied to both documents.
- The Travel Plan does not identify any remedial measures in the event that the Travel Plan targets and objectives are not met by the end of the monitoring period. Some examples of suitable remedial measures must be included in the Travel Plan.
- The applicants estimated cost of implementing the Travel Plan (£65,837.50) is considerably less than SCC's workings out (£127,975). On reviewing these costs the applicant has possibly underestimated the costs of employing the Travel Plan Coordinator, as that would usually require using a Transport Consultancy Company. SCC works out that the Travel Plan Coordinator will cost up to £35 per hour and will work up to 270 hours (11.25 hours per month) on years 1 and 2, 450

hours (18.75 hours per month) on years 3 and 4, and 1350 hours (37.5 hours per month) on years 5 to 7.

A revised Travel Plan that takes into account the comments raised above, should be submitted for approval prior to the determination on the application.

These revisions need to comply with National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people.
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Other relevant paragraphs include 34, 35, 36 and 37 as well as the "Travel Plans, Transport Assessments and Statements in Decision-taking" section of the 2014 Planning Practice Guidance.

In addition, a decent quality travel plan will also support Core Strategy Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

To ensure there is sufficient resource for Suffolk County Council to engage with the Travel Plan and there are certainties that the Travel Plan will be implemented in full; the following Section 106 contributions are required:

6. Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the travel plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.
7. Travel Plan Implementation Bond, or cash deposit - £127,975 (£512 per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.

The implementation of the Travel Plan should be secured solely by Section 106 obligations. A planning condition will be insufficient due to the size and possible phasing of the development. Therefore the following elements of the Travel Plan should be secured by Section 106 obligations:

- Implementation of the Interim Travel Plan (when approved)
- Provision of an approved welcome pack to each dwelling on first occupation
- Approval and full implementation of the Full Travel Plan

- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

All the contributions and obligations have taken into account CIL regulation 122 and are:

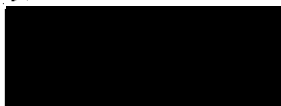
- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

Full wording for the proposed Section 106 obligations can be supplied at a later date if planning permission is granted.

Also the following planning condition will be required:

Submission and approval of a School Travel Plan prior to the commencement of the proposed Primary School development

Yours sincerely,



Steve Merry
Transport Policy and Development Manger
Resource Management

Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk



1 June 2017

Dylan Jones
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich IP6 8DL

By email only

Dear Dylan

Application: 4963/16

Location: Land west of Ixworth Road, Thurston IP31 3PB

Proposal: Outline Planning Application sought for up to 250 new dwellings, open space and associated infrastructure, up to 2.4Ha of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

Thank you for re-consulting Place Services on the above application.

No objection subject to securing mitigation and enhancement measures

Subsequent to receiving further information on skylarks (indicative plan of suitable arable land available within the applicant's control), I am now satisfied that there is sufficient ecological information available to understand the likely impacts of development on Priority species, particularly skylarks.

I recommend that mitigation & enhancement measures are required to make this proposal acceptable to enable the LPA to demonstrate its compliance with its statutory biodiversity duty under s40 NERC Act 2006.

Recommendations

The mitigation measures identified in the Preliminary Ecological Assessment report and Ecological Constraints and Opportunities Plan EN097-01-ECOP (both enims, March 2016) together with a skylark mitigation scheme should be secured and implemented in full. This is necessary to conserve and enhance Protected and Priority Species particularly reptiles and breeding birds including skylarks.

Impacts will be minimised such that the proposal is acceptable subject to the above conditions based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

Submission for approval and implementation of the details below should therefore a condition of any planning consent:

- I. **PRIOR TO COMMENCEMENT: COMPLIANCE WITH ECOLOGICAL APPRASAL RECOMMENDATIONS**



"All ecological mitigation & enhancement measures and/or works shall be carried out in accordance with the details contained in the Preliminary Ecological Assessment report Ecological Constraints and Opportunities Plan EN097-01-ECOP (both enlms, March 2016) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason: The applicant has provided sufficient information to allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

II. PRIOR TO COMMENCEMENT: SKYARK MITIGATION STRATEGY

"A skylark mitigation strategy shall be submitted for approval and implemented in full to mitigate the loss of nesting habitat."

Reason: To allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority habitats & species)

III. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME

"Prior to occupation, a lighting design scheme for biodiversity" shall be submitted to and approved in writing by the local planning authority. The scheme shall identify those features on site that are particularly sensitive for bats and that are likely to cause disturbance along important routes used for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent bats using their territory.

All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."

Please contact me with any queries.

Best wishes

Sue Hooton CEnv MCIEEM BSc (Hons)
Principal Ecological Consultant
Place Services at Essex County Council
sue.hooton@essex.gov.uk
07809 314447

Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Place Services
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County Hall, Chelmsford
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1 June 2017

Dylan Jones
Mid Suffolk District Council
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131 High Street
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By email only

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Impacts will be minimised such that the proposal is acceptable subject to the above conditions based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

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This may include the appointment of an appropriately competent person e.g. an ecological clerk of works (ECoW,) to provide on-site ecological expertise during construction. The appointed person shall undertake all activities, and works shall be carried out, in accordance with the approved details."

Reason: The applicant has provided sufficient information to allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

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All external lighting shall be installed in accordance with the specifications and locations set out in the scheme and maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority."

Please contact me with any queries.

Best wishes

Sue Hooton CEnv MCIEEM BSc (Hons)
Principal Ecological Consultant
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07809 314447

Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Our Ref: 570/CON/4963/16
Date: 8th June 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

The Planning Officer
Mid Suffolk District Council
Council Offices
131 High Street
Ipswich
Suffolk
IP6 8DL

For the Attention of: Dylan Jones

Dear Dylan

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/4963/16

PROPOSAL: Planning Application 4963/16 for up to 250 new dwellings, open space and associated infrastructure, up to 2.4HA of land for Thurston Community College, 2Ha of land for the provision of a new Primary School, including details of access on land west of Ixworth Road.

LOCATION: Ixworth Road, Thurston, Suffolk

ROAD CLASS: C

This letter is complimentary to that ref 570/CON/4963/16 dated 10th March 2017 and 3rd April 2017 which details Suffolk County Council's response to the cumulative effect that five developments in the parish of Thurston will have on the highway infrastructure.

Notice is hereby given that Suffolk County Council as Highways Authority does not object subject to a S106 planning obligation to its satisfaction and the following conditions being applied to any permission granted to it.

Introduction

Planning applications have been submitted to develop five sites around the village of Thurston. It was recognised at an early stage by the Planning Authority and Highways Authority that collaboration between all parties could provide a more effective package of infrastructure improvements supporting these developments than could be obtained by treating each as an individual application. The proposed Highway Conditions and Obligations in this letter are a result of the collaboration between Developers, their Agents, the Local Planning Authority and the Highways Authority over a number of months. It is recognised that the measures will not resolve all transport issues in and around Thurston but are proportional to the scale of development and mitigate those issues that are considered through the data presented to be severe.

If one or more of the five sites are not granted approval by the Local Planning Authority it is strongly recommended that the conditions and obligations contained in this response are reconsidered so that they provide robust mitigation for the impact of those sites granted planning permission.

Site Access

1. Condition: No other part of the development shall be commenced until the new vehicular accesses have been laid out and completed in all respects in accordance with Drawing No. 06/011 Rev E and with an entrance width of 6.3 meters and been made available for use.
Thereafter the access shall be retained in the specified form.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

2. Condition: Before the access is first used clear visibility at a height of 0.6 metres above the carriageway level shall be provided and thereafter permanently maintained in that area between the nearside edge of the metalled carriageway and a line 2.4 metres from the nearside edge of the metalled carriageway at the centre line of the access point (X dimension) and a distance of 120 metres in each direction along the edge of the metalled carriageway from the centre of the access (Y dimension) or tangential to the nearside edge of the metalled carriageway, whichever is the more onerous. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure vehicles exiting the drive would have sufficient visibility to enter the public highway safely, and vehicles on the public highway would have sufficient warning of a vehicle emerging to take avoiding action.

Comment: The visibility requirements are based on an extension of the 30mph speed limit north along Ixworth Road as listed in the proposed S106 obligations. If this obligation is removed the Highways Authority advise that the visibility requirements within Condition 2 are reconsidered.

3. Condition: The highway element of the development shall not commence until the Road Safety Audit (stages 1 and 2) process has been carried out in accordance with the Suffolk County Council Road Safety Audit Practice and Guidance and any necessary amendments or changes undertaken. The development shall not be [occupied / open for public access] until any requirements under stage 3 of the Road Safety Audit have been completed or a programme of remedial works has been agreed.

Reason: In the interests of highway safety to ensure the approved layout is properly designed.

4. Condition: No other part of the development shall be commenced until details of the emergency access off Mill Lane as shown on the indicative plan 06/013 Rev – are submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the access is designed and constructed to an appropriate specification and is brought into use before any other part of the development is commenced in the interests of highway safety.

5. Condition: No dwellings shall be occupied until the emergency access off Mill Lane is completed and available for use by emergency vehicles.

Reason: To ensure that a suitable alternative emergency access is available into the development.

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land compensation claims, commuted sums, and changes to the existing street lighting and signing.

Internal Highway layout

Note: The Local Planning Authority recommends that developers of housing estates should enter into formal agreement with the Highway Authority under Section 38 of the Highways Act 1980 relating to the construction and subsequent adoption of Estate Roads.

6. Condition: Before the development is commenced, details of the estate roads and footpaths, (including layout, levels, gradients, surfacing, lighting, traffic calming and means of surface water drainage), shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In the interests of highway safety to ensure that roads/footways are constructed to an acceptable standard.

7. Condition: No dwelling shall be occupied until the carriageways and footways serving that dwelling have been constructed to at least Binder course level or better in accordance with the approved details except with the written agreement of the Local Planning Authority.

Reason: In the interests of highway safety to ensure that satisfactory access is provided for the safety of residents and the public.

8. Condition: Before the development is commenced details of the areas to be provided for the manoeuvring and parking of vehicles including electric vehicle charging points, powered two vehicle provision, secure covered cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with Suffolk Guidance for Parking (2015) where on-street parking and manoeuvring would be detrimental to highway safety.

9. Condition: Before the development is commenced details of the areas to be provided for storage and presentation of Refuse/Recycling bins shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter for no other purpose.

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users in the interests of highway safety.

10. Condition: Before the development is commenced details shall be submitted to and approved in writing by the County Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. The approved scheme shall be carried out in its entirety before the access is first used and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the highway in the interests of highway safety.

11. Condition: Prior to the commencement of any part of the development details of the proposed tree planting and landscaping shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out as approved.

Reason: to ensure new trees are not planted close to roads and that they have an approved root direction system to prevent damage to the roads and footways and to ensure that visibility splays remain unobstructed by proposed planting.

Construction Management Plan

12. Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan. The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) details of proposed means of dust suppression
- h) details of measures to prevent mud from vehicles leaving the site during construction
- i) haul routes for construction traffic on the highway network and
- j) monitoring and review mechanisms.
- K) Details of deliveries times to the site during construction phase

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

Footway and cycle connectivity

13. Condition: Construction of a metalled 3.0m (nominal width) footway / cycleway on Ixworth Road between the site entrance and Norton Road as shown on Drawings 06/011 Rev D and 06/12 Rev A. Where the footway lies without the current limits of the public highway the contractor shall arrange for adoption of these areas via the S38 process.

Reason: To provide pedestrian access between the site and the main village via Station Hill and to include all parts of the footway within the public highway.

14. Condition: Construction of a metalled 2.0m (nominal width) footway on Ixworth Road between the site entrance and Thurston Rugby Club as shown on Drawing 06/011 Rev D.

Reason: To provide pedestrian access between the main village and the Rugby Club and link the development with the wider PRow network.

Note: It is an OFFENCE to carry out works within the public highway, which includes a Public Right of Way, without the permission of the Highway Authority.

The works within the public highway will be required to be designed and constructed in accordance with the County Council's specification.

The applicant will also be required to enter into a legal agreement under the provisions of Section 278 of the Highways Act 1980 relating to the construction and subsequent adoption of the highway improvements. Amongst other things the Agreement will cover the specification of the highway works, safety audit procedures, construction and supervision and inspection of the works, bonding arrangements, indemnity of the County Council regarding noise insulation and land

compensation claims, commuted sums, and changes to the existing street lighting and signing.

Public Rights of Way (PRoW)

Note: The public right of way Thurston Footway 18 cannot be lawfully driven along without due authority. This highway must remain unobstructed at all times. It is an offence to disturb the surface of the highway so as to render it inconvenient for public use. Therefore it is imperative that the surface is properly maintained for lawful use during the construction phase and beyond.

The Highway Authority will seek to recover the cost of any such damage which it actions for repair.

Comment: Changes to the alignment of, or additions to the existing PRoW network (eg spurs to the proposed school site) must be agreed with the relevant SCC PRoW Officer. Care should be taken not to create a canyon effect by confining footpaths between linear features such as walls, high hedges and fences.

Proposed S106 Highways Contributions

All contributions must be appropriately index linked. Any of the above contributions unspent or not committed 5 years following occupation of the final dwelling to be repaid.

1. Improvements to PRoW Thurston 001 between Meadow Lane and Ixworth Road. A contribution of £8889 is required on completion of 50% of the total number of dwellings.
2. Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction. A contribution of £27297 is required on occupation of the first dwelling.
3. Contribution towards improvements at the A143 Bury Road / C691 Thurston Road / C649 Brand Road, junction at Great Barton. A contribution of £86155 is required on commencement of construction work on site.
4. Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a 40mph speed limit on the C692 Thurston Road. A contribution of £15780 is required on commencement of the first dwelling.
5. Extension of the 30mph speed limit to Thurston Rugby Club. A contribution of £8000 is required on commencement of work on site.

The S106 proposals are based on the assumption of a collaborative approach as outlined in our letter of the 10th March 2017. If this site is determined as a stand-alone application these conditions and contributions would be re-assessed.

Travel Plan and S106 Contributions

The Residential Travel Plan (dated November 2016) that was submitted to support the application for the proposed 250 dwelling development in Thurston has identified some suitable measures and targets to mitigate the highway impact from the development. However there is some further work that will need to be done to the Travel Plan for it to be fully compliant with current planning guidance:

- The 384 and 385 bus services that serve within the vicinity of the proposed development would only be suitable for commuting to Bury St Edmunds for a typical 9am to 5pm shift. The times and frequencies would not be suitable for commuting to Stowmarket, which is an employment destination for residents of Thurston identified by the 2011 Census. There will need to be further reference in the Travel Plan on how this issue could be overcome.
- There must be a commitment included in the Travel Plan to fully implement and monitor the Travel Plan for a minimum of five years, or one year after occupation of the final (250th) dwelling, whichever is longest. This will ensure that if the development takes longer than five years to build-out the Travel Plan will continue to be implemented until full completion of the development. Also the baseline Travel Plan monitoring should commence on occupation of the 100th dwelling, as undertaking this monitoring on occupation of the 50th dwelling is unlikely to provide representative resident travel data for the site.
- A Full Travel Plan, that includes the site-specific baseline data and some revised measures should be submitted for approval on occupation of the 100th dwelling.
- The provision of a £100 public transport voucher is a good measure and welcomed by SCC. However there should be an option for the resident to receive an alternative cycle voucher of equivalent value if they feel that the public transport voucher would not be of benefit to them. This option will need to be included in the Travel Plan.
- The Welcome Pack should also offer a Personalised Travel Planning service to demonstrate all the sustainable transport options for each residents regular journeys (i.e. commuting).
- In regards to the proposed 'walking bus' measure to the local primary schools; has this been discussed with the existing primary school, as this measure is likely to require additional resource for the school? Evidence of the outcomes of the discussions with the school must be included in the Travel Plan.
- The 15% target for a reduction in single-occupancy vehicle travel is a good target. However on reviewing the supporting Transport Assessment (dated November 2016) there is no reference to the Travel Plan target being applied to reduce the highway impact generated by the development. This goes against the overarching principles in the "Travel Plans, Transport Assessments and Statements in Decision-taking" section of the 2014 Planning Practice Guidance. Therefore reference to the overarching of the Travel Plan and Transport Assessment will need to be applied to both documents.
- The Travel Plan does not identify any remedial measures in the event that the Travel Plan targets and objectives are not met by the end of the monitoring period. Some examples of suitable remedial measures must be included in the Travel Plan.
- The applicants estimated cost of implementing the Travel Plan (£65,837.50) is considerably less than SCC's workings out (£127,975). On reviewing these costs the applicant has possibly underestimated the costs of employing the Travel Plan Coordinator, as that would usually require using a Transport Consultancy Company. SCC works out that the Travel Plan Coordinator will cost up to £35 per hour and will work up to 270 hours (11.25 hours per month) on years 1 and 2, 450

hours (18.75 hours per month) on years 3 and 4, and 1350 hours (37.5 hours per month) on years 5 to 7.

A revised Travel Plan that takes into account the comments raised above, should be submitted for approval prior to the determination on the application.

These revisions need to comply with National Planning Policy Framework paragraph 32, which sets out that plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people.
- improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.

Other relevant paragraphs include 34, 35, 36 and 37 as well as the "Travel Plans, Transport Assessments and Statements in Decision-taking" section of the 2014 Planning Practice Guidance.

In addition, a decent quality travel plan will also support Core Strategy Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

To ensure there is sufficient resource for Suffolk County Council to engage with the Travel Plan and there are certainties that the Travel Plan will be implemented in full; the following Section 106 contributions are required:

6. Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the travel plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.
7. Travel Plan Implementation Bond, or cash deposit - £127,975 (£512 per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.

The implementation of the Travel Plan should be secured solely by Section 106 obligations. A planning condition will be insufficient due to the size and possible phasing of the development. Therefore the following elements of the Travel Plan should be secured by Section 106 obligations:

- Implementation of the Interim Travel Plan (when approved)
- Provision of an approved welcome pack to each dwelling on first occupation
- Approval and full implementation of the Full Travel Plan

- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

All the contributions and obligations have taken into account CIL regulation 122 and are:

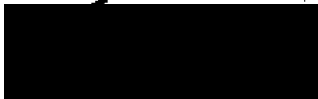
- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

Full wording for the proposed Section 106 obligations can be supplied at a later date if planning permission is granted.

Also the following planning condition will be required:

Submission and approval of a School Travel Plan prior to the commencement of the proposed Primary School development

Yours sincerely,



Steve Merry
Transport Policy and Development Manger
Resource Management

From: Khan Wasil [mailto:Wasil.Khan@networkrail.co.uk] **On Behalf Of** Town Planning SE
Sent: 03 May 2017 11:56
To: Planning Admin
Cc: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / (anglia)

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application 5070/16 and offering us the opportunity to comment.

We have reviewed the application above and assessed the further combined developments which include the below planning applications.

- 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH – 175 dwellings
- 4963/16 / Land west of Ixworth Road, Thurston IP31 3PB – 250 dwellings
- 4942/16 / Land at Meadow Lane, Thurston IP31 3QG – 64 dwellings
- 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT – 138 dwellings
- 5070/16 - Land at Norton Road, Thurston – 200 dwellings

We note the five submitted developments have a total residential occupancy of approximately 827 units.

It should be noted that Network Rail's strategy is to close level crossings wherever possible as this removes any interface where a person or vehicle could be struck by a train. Therefore the major concern for Network Rail in relation to these proposals, is the Barrow level Crossing at Thurston Station. Historically we have seen a number of issues at this crossing and cannot accept additional impact and further usage unless mitigation and measures are introduced; therefore the preferred option in this location would be to close the level crossing.



The safety justification for closure of the crossing is set out below:

Thurston station level crossing is a footpath crossing with miniature warning lights located at the end of the platforms at Thurston. The crossing traverses two lines and is 8.9m in length, equating to a user requirement of 11.35 seconds to traverse the crossing, with a required sighting distance of 381m, of which there is currently insufficient sighting but this is mitigated by the miniature warning lights.

Trains run frequently over the crossing with approximately 124 trains running at up to 75mph for 24 hours per day with stopping and non-stopping trains.

Particular factors have to be considered for the safety of those using the crossing. Network Rail has a standard Risk Assessment tool called ALCRM (All Level Crossing Risk Model), which determines the predictive level of risk at a level crossing based on a variety of factors, including misuse, train information, number of users, the environment, available sighting etc. Based on the information entered, ALCRM calculates the risk score which generates an individual risk to a user (A to M) and a collective risk (1 to 13) with A and 1 being the highest calculated risk.

Within these risk bands, ALCRM also calculates a Fatality & Weighted Injuries (FWI) score. When the last ALCRM assessment was undertaken in July 2015, Thurston level crossing's risk score was calculated as 0.001924552 (D4), which is outside of ALCRM's high risk categories.

The proposed residential development will see the usage at this crossing increase to a greater level and therefore mitigation options to decrease the risk will need to be explored in order for Network Rail to support the planning application.

Without definitive numbers, the increase in pedestrian footfall has been modelled in ALCRM as follows:

- 75 Pedestrians per day: D4 with a FWI of 0.001924552 (Last census)
- 120 Pedestrians per day: D4 with a FWI of 0.003079283
- 150 Pedestrians per day: D4 with a FWI of 0.003849104
- 200 Pedestrians per day: D3 with a FWI of 0.005132138

As you can see the FWI rises, with 200 pedestrians a day this would move the crossing into a High risk category. Currently a new risk assessment is being carried out and from a safety perspective if the development were to be approved then the level crossing will see a significant increase in pedestrian usage (currently 75 users per day). In all of the aforementioned pedestrian scenarios, there would be a marked increase in the risk profile at this level crossing which would therefore be unacceptable.

Given the increase in risk and increased usage at the station, we believe the development will have a severe effect on safety unless mitigation measures are introduced and contributions are provided in order to fund the closure of the crossing. The measures required to close the crossing are outlined in the attached feasibility report. In light of the 5 applications coming forward, we believe the only fair and reasonable solution would be for the applicants to share the cost of the crossing closure. The cost of the closure is estimated to be £1million, which equates to £1209.19 per dwelling.

Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied by the amount of dwellings which are permitted, to enable the closure of the level crossing.

Reason: To ensure safe and suitable access can be provided in accordance with Paragraph 32 of the NPPF.

Kind Regards,

Wasil Khan
Town Planning Technician, Property

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From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]
Sent: 06 April 2017 15:10
To: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Land at Norton Road, Thurston

Proposal: Outline Planning Permission sought for the erection of up to 200 homes (including 9 self build plots), primary school site together with associated access, infrastructure, landscaping and amenity space (all matters reserved except for access)

We have received an application on which we would like you to comment. A consultation letter is attached. To view details of the planning application online please click [here](#)

We request your comments regarding this application and these should reach us

within 14 days. Please make these online when viewing the application.

The planning policies that appear to be relevant to this case are GP1; NPPF, SC4, Cor4, RT12, CL8, C01/03, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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