

**From:** Infrastructure Team (Babergh Mid Suffolk)  
**Sent:** 16 January 2017 15:00  
**To:** Planning Admin  
**Subject:** RE: Consultation on Planning Application 5070/16  
**Importance:** High

Community Infrastructure Levy (CIL) is assessed upon grant of Reserve Matters permission. If the self build plots fit the definition of self build as stipulated within the CIL Regulations 2010 (as amended) they could apply for exemption but they must ensure that all forms are submitted prior to the commencement of any part of the development as described in the outline application unless phasing could be applied to separate each self build plot from the rest of the rest of the development. #the relevant regulations that apply here are Reg 8 and Reg 54A.

Kind Regards,

Nicola

**Infrastructure Team**  
Babergh and Mid Suffolk District Council – Working Together

Tel: 01449 724563

## **Consultee Comments for application 5070/16**

### **Application Summary**

Application Number: 5070/16

Address: 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)

Case Officer: Dylan Jones

### **Consultee Details**

Name: Mr Robert Boardman (Stowmarket Ramblers)

Address: 8 Gardeners Walk, Elmswell, Bury St Edmunds IP30 9ET

Email: bob@gardeners8.plus.com

On Behalf Of: Ramblers Association - Bob Boardman (temp cover)

### **Comments**

I have viewed these plans and I have serious concerns that this very large development will totally swamp existing footpath no.7 which together with the lane makes a very pleasant walk to Pakenham.

**From:** RM Floods Planning  
**Sent:** 23 January 2017 11:01  
**To:** Planning Admin  
**Cc:** Dylan Jones  
**Subject:** 2017-01-23 JS Reply Land at Norton Road, Thurston Ref 5070/16

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

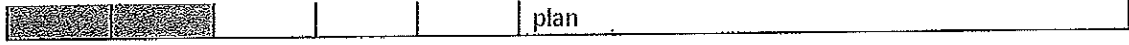
The theory for the proposals to dispose of the surface water from the site via a mixture of infiltration and a controlled discharge to a watercourse which is a tributary of a main river (Pakenham fen).

The applicant and planning authority need to address the following points though:

- 1) Who will adopt, manage and maintain each aspect of the surface water drainage system
- 2) Is the proposed depth of water and side slopes (*assumed 1:3*) in basin B acceptable (*would need a risk assessment*) so close to residential properties, if not is there enough space to enlarge it so that the depth of water is shallower and side slopes no greater than 1:4.
- 3) Will basin A provide enough interception and treatment in line with best practise e.g. Ciria c753 and SCC local Suds Guidance
- 4) Is it acceptable to have some soakaways spanning two or more dwellings

The applicant also needs to demonstrate that the proposed development site has an agreement in principle to have a continual right to discharge water from basin A into the watercourse and who will be responsible for this outfall.

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 <sup>rd</sup> 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



Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411



## The Archaeological Service

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

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Mid Suffolk District Council  
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\_5070  
Date: 26 January 2017

For the Attention of Dylan Jones

Dear Mr Isbell

### **Planning Application 5070/16 – Land at Norton Road, Thurston: Archaeology**

This large development site is located in an area of archaeological potential recorded on the County Historic Environment Record (HER). The possible site of Old Netherhall, the precursor to the later manor house at Pakenham, is situated within the woodland which forms the eastern section of the application area (THS 010). A Bronze Age urn was also recorded to the north-west of the development area (THS 003), with finds of prehistoric and medieval date also recorded in the vicinity (BSE Misc and THS Misc). As a result, there is high potential to encounter 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.

This large site has never previously been subject to systematic archaeological investigation, 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.

Therefore, 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

**From:** RM PROW Planning  
**Sent:** 30 January 2017 15:48  
**To:** Planning Admin  
**Cc:** Christopher Fish; Claire Dickson; mail@beaconplanning.co.uk  
**Subject:** RE: Consultation on Planning Application 5070/16

**Our Ref:** W523/007/ROW973/16

**For The Attention of:** Dylan Jones

### **Public Rights of Way Response**

Thank you for your consultation concerning the above application.

This response deals only with the onsite protection of affected PROW, and does not prejudice any further response from Rights of Way and Access. As a result of anticipated increased use of the public rights of way in the vicinity of the development, SCC may be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

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 7 is recorded through the proposed development area and has a minimum width of 1.5m.

The proposed landscaping must allow a 1m corridor either side of the FP7 to ensure there is no encroachment by growth, causing an obstruction. The landscaping is the responsibility of the landowner to maintain.

We have **no objection** to this proposal.

#### **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.

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.

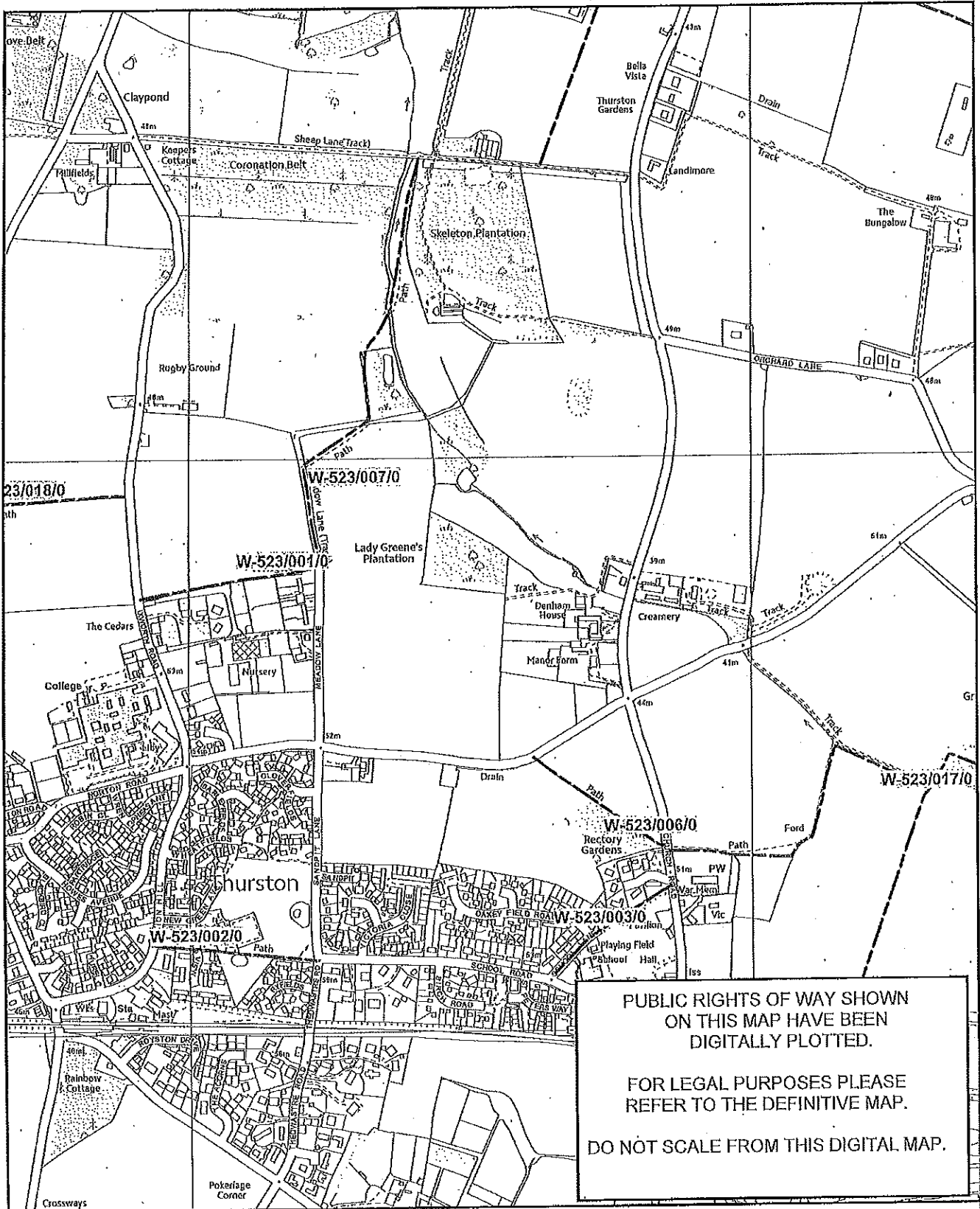
"Public Rights of Way Planning Application Response - Applicant Responsibility" and a digital plot showing the definitive alignment of the route as near as can be ascertained; which is for information only and is not to be scaled from, is attached for the applicant.

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://publicrightsofway.onesuffolk.net/> | [Report A Public Right of Way Problem Here](#)

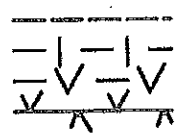




**5070/16 Land at Norton Road, Thurston**  
**Public Footpath 7**



Resource Management  
 Endeavour House, 3 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: 30/01/2017



Environment  
Agency

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

Our ref: AE/2017/121259/01-L01  
Your ref: 5070/16

Date: 01 February 2017

Dear Mr Jones

**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) LAND AT NORTON ROAD THURSTON**

Thank you for consulting us on this application which we received on 12 January 2017. We have no objection to the proposal and offer the following advice regarding flood risk, foul water disposal, an historic landfill and sustainability.

**Flood risk**

A small area of the north east corner of the site lies in Flood Zone 3. Using the site sequentially should be possible with either no development in this location or using the area for SuDS features.

The submitted information about flood risk demonstrates that the development will comply with the National Planning Policy Framework's policies on flood risk.

We recommend that all materials introduced to the floodplain are securely installed or fixed to reduce the likelihood of floating debris being produced during periods of high flows.

We have reviewed the submitted flood risk assessment with regard to tidal and fluvial flood risk sources only and recommend that the Lead Local Flooding Authority (LLFA) be consulted regarding surface water flooding and sustainable drainage for the development. LLFAs are now a statutory consultee for all major development proposals, providing technical advice on surface water drainage and SuDS.

## **Foul water**

A foul water sewer is available in Meadow Lane. We expect developments discharging domestic sewage to connect to the public foul sewer where it is reasonable to do so. Where it is not reasonable to connect to the public foul sewer we will grant an environmental permit, as long as the proposed discharge is otherwise environmentally acceptable.

We also expect discharges of trade effluent to connect to the public foul sewer, where it is reasonable to do so, and subject to the sewerage undertaker granting a trade effluent consent or entering into a trade effluent agreement

The applicant should submit evidence to demonstrate that the sewage undertaker can accept the additional load from the development. You may wish to consider a suitable condition.

## **Landfill**

There is an historic landfill 100m south east of the site described as Church Lane on our maps. We believe the landfill only received inert waste. On the 22nd of June 2007 we sent your Authority a CD containing historic landfill data which has all the information we hold on the historic landfill sites within 250m of this development proposal.

## **Sustainability**

Climate change is one of the biggest threats to the economy, environment and society. New development should therefore be designed with a view to improving resilience and adapting to the effects of climate change, particularly with regards to already stretched environmental resources and infrastructure such as water supply and treatment, water quality and waste disposal facilities. We also need to limit the contribution of new development to climate change and minimise the consumption of natural resources.

Opportunities should therefore be taken in the planning system, no matter the scale of the development, to contribute to tackling these problems. In particular we recommend the following issues are considered at the determination stage and incorporated into suitable planning conditions:

- **Overall sustainability:** a pre-assessment under the appropriate Code/BREEAM standard should be submitted with the application. We recommend that design Stage and Post-Construction certificates (issued by the Building Research Establishment or equivalent authorising body) are sought through planning conditions.
- **Resource efficiency:** a reduction in the use of resources (including water, energy, waste and materials) should be encouraged to a level which is sustainable in the long term. As well as helping the environment, Defra have advised that making simple changes resulting in the more efficient use of resources could save UK businesses around £23bn per year.

- Net gains for nature: opportunities should be taken to ensure the development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.
- Sustainable energy use: the development should be designed to minimise energy demand and have decentralised and renewable energy technologies (as appropriate) incorporated, while ensuring that adverse impacts are satisfactorily addressed.

These measures are in line with the objectives of the NPPF, as set out in paragraphs 7 and 93-108. Reference should also be made to the Climate Change section of the draft National Planning Practice Guidance, in particular: "Why is it important for planning to consider climate change?" and "Where can I find out more about climate change mitigation and adaptation?"

<http://planningguidance.planningportal.gov.uk/blog/guidance/>

We trust this response is useful:

Yours sincerely



**Mr GRAHAM STEEL**  
**Sustainable Places - Planning Advisor**

Direct dial 02 03 02 58389

Direct e-mail [graham.steel@environment-agency.gov.uk](mailto:graham.steel@environment-agency.gov.uk)

cc Beacon Planning Ltd

**From:** Christopher Fish  
**Sent:** 02 February 2017 15:58  
**To:** Dylan Jones  
**Subject:** Re: Consultation on Planning Application 5070/16

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. We should, of course, try to respond fully as soon as possible.

Regards,

Christopher Fish MEng IEng  
Senior Development Management Engineer, Transport Strategy, Strategic Development - Resource Management, Suffolk County Council, Endeavour House, 8 Russell Road, Ipswich, IP1 2BX Telephone: 01473 265924 Email: [christopher.fish@suffolk.gov.uk](mailto:christopher.fish@suffolk.gov.uk) Web site: <http://atrium.suffolkcc.gov.uk/ePlanningOHS/index.jsp>

**From:** Nathan Pittam  
**Sent:** 03 February 2017 08:43  
**To:** Planning Admin  
**Subject:** 5070/16/OUT. EH - Land Contamination.

**M3 : 188875**  
**5070/16/OUT. EH - Land Contamination.**  
**Land at, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.**  
**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 ..**

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that a Phase I desk study and risk assessment has been submitted in support of the application. The report has been produced by MLM Environmental dated 21<sup>st</sup> December 2016 (ref. 618211-REP-ENV-001). The report covers the historical use of the site and concludes that the only onsite risk is the potential for an infilled pond within the woodland area which is being retained as part of the development. I do not believe that the risk posed by this small area of potential infill that is to remain undeveloped is sufficient to enable us to require further works to be done by means of condition and as such I can confirm that I have no objection to the proposed development from the perspective of land contamination.

Should the applicant wish to undertake the advisory work as outlined in the MLM report we would be more than willing to review this documentation informally and hold this on record for information.

Regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD  
Senior Environmental Management Officer  
**Babergh and Mid Suffolk District Councils – Working Together**  
t: 01449 724715  
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## NEIGHBOURHOOD PLAN TEAM

Parish Council Office  
New Green Centre  
New Green Avenue  
Thurston  
Suffolk  
IP31 3TG  
Tel: 01359 232854  
e-mail: thurstonnpsg@hotmail.com



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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

30<sup>th</sup> January 2017

Dear Cllr. Robinson,

**5070/16 – 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) @ land at Norton Road**

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 Ltd, Granary Site, Station Road	2430/08	Outline granted. Phase 2 delayed.	Remainder of site with blocks of flats.	92
Playdri Products Ltd, 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
<b>Possible number of dwellings to be added to Thurston</b>				<b>928</b>

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 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 5010/16	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 5010/16	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 equity	
1		6										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	6		13 houses 2 4/5 houses							
Self-build		9										
Sub Total	163	130	42	114	90	65	70	18	61	48	22	6
Total	530					260					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 often via Fishwick Corner where Barton (New) Road makes a junction with Mount Road. This has already been found to be an accident-prone congested junction 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 are 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 dangers 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, the Neighbourhood Plan Team felt that as there were major and fundamental issues preventing sustainable development the site could not be submitted for detailed assessment and would not be considered further within the Neighbourhood Plan sites assessment work. It was felt that the site was very open and would encroach significantly into the countryside and that the site was separate from the settlement boundary.

The Neighbourhood Plan Team stands by the assessment given to this site and would ask the Parish Council to consider its major concerns for this application on this site for the following reasons:

- Separate from the settlement boundary

- Site encroaches into countryside
- Site is regarded as prime agricultural land
- 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.
- 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 Pokerlage Corner
- pedestrian safety along Norton Road for accessing village facilities as there are no safe crossing points
- impact of the vehicular movements from a double point of entry onto Norton Road.
- development inappropriate to that of land abutting the countryside
- impact on village infrastructure particularly education and 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.
- Proximity of and impact on Grade II\* listed building Manor Farm House – visual and historic architectural
- Size of school being proposed – 2 form entry with the possibility of expanding to 3

In summary, whilst the Neighbourhood Plan Team recognises the need for future development to take place within Thurston it does not in any way support this application for the reasons mentioned above.

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



**PARISH COUNCIL**

Comments from: Thurston Parish Clerk

**Planning Officer:** Dylan Jones

**Application Number:** 5070 / 16

**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)

**Location:** Land at Norton Road, Thurston

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 would like to register its strong objection to this planning application and asks that the attached letter be read in conjunction with this statement.

For Planning Applications only

Support

Object

No Comments

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

on behalf of Thurston.....town/parish council

Dated.....07.02.2017.....



Your ref: 5070/16  
Our ref: 00048539  
Date: 07 February 2017  
Enquiries to: Peter Freer  
Tel: 01473 264801  
Email: [peter.freer@suffolk.gov.uk](mailto: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 North of Norton Road (East of Meadow Lane) IP31 3QJ -  
Outline Planning Permission sought for the erection of up to 200 homes  
(including 9 self build plots), primary school site -**

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



## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	5070/16/OUT- Land at Norton Road, Thurston	
<b>2</b>	<b>Date of Response</b>	16 <sup>th</sup> February 2017	
<b>3</b>	<b>Responding Officer</b>	Name:	Louise Barker
		Job Title:	Housing Enabling Officer
		Responding on behalf of...	Strategic Planning
<b>4</b>	<b>Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection	
<b>5</b>	<b>Discussion</b> 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.	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>This is a development proposal for 200 residential dwellings and triggers an affordable housing provision requirement of 35% under altered policy H4 of the Mid Suffolk Local Plan (on development proposals of 5 units and over outside of Stowmarket and Needham Market) equating to 70 affordable housing units.</p> </div> <p><b>1. Housing Need Information:</b></p> <p>1.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2012, confirms a continuing need for housing across all tenures and a growing need for affordable housing.</p> <p>1.2 The 2012 SHMA indicates that in Mid Suffolk there is a need for 229 new affordable homes per annum. The Survey also confirmed that an appropriate affordable housing tenure split for the District is 75% rented and 25% low cost home ownership tenure accommodation.</p>	

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

		<p>1.3 Furthermore the 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are a key driver for this increased demand for smaller homes.</p> <p>1.4 With an aging population, both nationally and locally new homes should, wherever possible, be built to Lifetime-Homes standards and this can include houses, apartments and bungalows.</p> <p>1.5 The Suffolk Housing Needs Survey also confirms that there is strong demand for one and two bedroom flats/apartments and houses. Developers should consider flats/apartments that are well specified with good size rooms to encourage downsizing amongst older people, provided these are in the right location for easy access to facilities. There is also a demand for smaller terraced and semi-detached houses suitable for all age groups and with two or three bedrooms.</p> <p>1.6 Broadband and satellite facilities as part of the design for all tenures should be standard to support.</p> <p>1.7 All new properties need to have high levels of energy efficiency.</p> <p>1.8 Studio and bedsit style accommodation is not in high demand.</p>
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	<p><b>2. Choice Based Lettings Information:</b></p> <p>2.1 The Council's Choice Based Lettings system currently has circa 844 applicants registered for housing in Mid Suffolk. Currently there are circa 18 applicants registered stating a local connection to Thurston. This site is a S106 planning obligation site therefore affordable housing will be to meet district wide need hence the 844 applicants registered is the figure to note.</p> <p>2.2 The district wide majority need on the housing register is for 1 and 2 bedrooms. There is also a smaller element requiring 3+ bedroom properties.</p> <p><b>3. Recommended Affordable Housing Mix:</b></p> <p>3.1 35% affordable housing on this proposal based on 200 units equates to 70 AH units.</p> <p>3.2 Based on the above information, the following mix with a 75%/25% tenure split is recommended:</p> <p>Affordable Rent Tenancy = 52 units as follows:</p> <ul style="list-style-type: none"> <li>• 12 x 1b 2p flats @ 50sqm</li> <li>• 2 x 1b 2p bungalows @ 50sqm</li> <li>• 4 x 2b 4p bungalows @ 70sqm</li> <li>• 22 x 2b 4p houses @ 79sqm</li> <li>• 11 x 3b 6p houses @ 102sqm</li> <li>• 1 x 4b x 7p house @ 115sqm</li> </ul> <p>Shared Ownership = 18 units as follows:</p> <ul style="list-style-type: none"> <li>• 12 x 2bed 4p houses @ 79sqm</li> <li>• 6 x 3bed 6p person houses @ 102sqm</li> </ul> <p>(Recommended nationally described space standards.)</p>
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#### 4. Other requirements for affordable homes:

- Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards
- The council is granted 100% nomination rights to all the affordable units in perpetuity
- The Shared Ownership properties must have an 80% stair casing bar.
- 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
- 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
- On larger sites the affordable housing should not be placed in groups of more than 15 units
- Adequate parking provision is made for the affordable housing units
- It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk) under Housing and Affordable Housing for full details.
- AH dwellings must be tenure blind.

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		<p><b>5. Open Market Homes Mix:</b></p> <ul style="list-style-type: none"> <li>• There is a strong need for homes more suited to the over 55 age bracket within the district and supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality.</li> <li>• It is noted that a number of bungalows/chalet bungalows are proposed and this is welcomed.</li> <li>• There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities.</li> <li>• The 2011 census shows 85.1% under occupied households in Thurston. (ONS 2011 Census: QS412EW).</li> <li>• It is recommended that there is a broader mix of open market housing on this scheme incorporating the majority of units as 1, 2 and 3 bedroom with a much smaller element of 4+bedrooms to reflect the above information. We would be looking for less 3, 4 &amp; 5 bed houses and a greater amount of 2 beds than are proposed.</li> </ul>
6	<p><b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	

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7	<b>Recommended conditions</b>	
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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.





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: 5070/16 Outline Planning Permission sought for the erection of up to 200 homes (including 9 self-build plots), primary school site with associated access, infrastructure, landscaping and amenity space (all matters reserved except access). Land at Norton Road, Thurston**

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

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

The site is largely bounded by hedgerows with trees. As identified in the ecological survey report these areas offer nesting habitat for bird species and foraging and commuting habitat for bats species. We note that it is unclear how much of the species rich hedgerows on the south and west boundaries are to be retained. The location and access to the self-build plots off Meadow Lane suggest the majority of this hedgerow will be removed. Hedgerows are a UK and Suffolk Priority habitat under section 41 of the Natural Environment and Rural Communities (NERC) Act (2006). Consent should not be granted for development which results in the uncompensated loss of such habitats.

Although no skylarks were recorded nesting on the site at the time of the ecological survey, this was carried out late 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.

Although no evidence of badger was found on the application site during the ecological survey, they are known to be present in the immediate vicinity of the site (further information available from Suffolk Biodiversity Information Service (SBIS)) and their presence on site cannot be ruled out in the future. Badgers can rapidly colonise new areas and therefore a further walkover survey to confirm their absence should be undertaken immediately prior to any works commencing. If any evidence is found at any time, further advice should be sought from a suitably qualified ecologist.

A company limited by  
guarantee no 695346  
Registered charity no 262777

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 open green corridors. 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.

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: 5070/16**

**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**

Thank you for consulting Place Services on the above application.

**Holding objection:** There is insufficient ecological information available to understand the residual impacts of development on Priority species, particularly skylarks. This is due to a lack of survey data so only an opinion is provided.

Indeed the Preliminary Ecological Appraisal report (Base Ecology, Sept 2016) states that:

*"Due to the arable character of the site, there is potential for habitat of farmland birds such as skylark to be lost through the proposed development. However, the impact of such is considered to be minor in context of the development footprint...."*

As it is possible that skylark territories may be lost, and no mitigation has been offered eg offsite nest plots on nearby arable land, a clarification of the likelihood of impact is required. The PEA also states that: *"The northern half of the site is surrounded by tall hedgerows and woodland which is less favourable for nesting purposes due to the risk of predation, (there is) the disturbance associated with regular dog walkers, and (there is) the widespread availability of arable farmscape in the local area."*

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 MCIEM BSc (Hons)**  
Principal Ecological Consultant  
Place Services at Essex County Council  
[sue.hooton@essex.gov.uk](mailto: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.



Midlands & East (East)  
Swift House  
Hedgerows Business Park  
Colchester Road  
Chelmsford  
Essex CM2 5PF

Email address: [kerryharding@nhs.net](mailto:kerryharding@nhs.net)

Telephone Number – 0113 824 9111

Your Ref: 16/5070

Our Ref: NHSE/MIDS/16/5070/KH

Planning Services  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Needham Market, IP6 8DL

14 February 2017

Dear Sirs,

**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).  
Land at Norton Road, Thurston.**

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

#### **Background**

2. The proposal comprises a development of up to 200 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

#### **Review of Planning Application**

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

#### **Healthcare Impact Assessment**

4. The intention of NHS England is to promote Primary Healthcare Hubs with co-ordinated mixed professionals. This is encapsulated in the strategy document: The NHS Five Year Forward View.

*High quality care for all, now and for future generations*

5. The primary healthcare services directly impacted by the proposed development and the current capacity position is shown in Table 1.

**Table 1: Summary of capacity position for healthcare services closest to the proposed development.**

Premises	Weighted List Size <sup>1</sup>	NIA (m <sup>2</sup> ) <sup>2</sup>	Capacity <sup>3</sup>	Spare Capacity (NIA m <sup>2</sup> ) <sup>4</sup>
Mount Farm Surgery	12,244	768.40	11,206	-71.19
Woolpit Health Centre	14,134	645.87	9,419	-323.32
<b>Total</b>	<b>26,378</b>	<b>1,414.27</b>	<b>20,625</b>	<b>-394.51</b>

**Notes:**

1. The weighted list size of the Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
  2. Current Net Internal Area occupied by the Practice.
  3. Based on 120m<sup>2</sup> per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services".
  4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment or reconfiguration at Mount Farm Surgery, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.
7. Although, due to the unknown quantiles associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

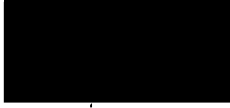
**Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising**

8. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought.
9. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.
10. NHS England is satisfied that the basis of a request for CIL contributions is consistent with the Regulation 123 list produced by Mid Suffolk District Council.

NHS England and the CCG look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter.

*High quality care for all, now and for future generations*

Yours faithfully



**Kerry Harding**  
Estates Advisor

*High quality care for all, now and for future generations*



Historic England

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

Direct Dial: 01223 582721

Our ref: P00555391

17 February 2017

Dear Mr Jones

**Arrangements for Handling Heritage Applications Direction 2015 &  
T&CP (Development Management Procedure) (England) Order 2015**

**LAND AT NORTON ROAD, THURSTON**

**Application No 5070/16 – Erection of Up To 200 Homes**

Thank you for your letter of 14th February 2017 notifying Historic England of the above application.

### Summary

This application proposes a large residential development on open land at the northern edge of Thurston village. This land is west of the grade II\* listed Manor Farm House and could affect its setting. The Council should consider the development's potential to harm the significance of the listed building when assessing the application.

### Historic England Advice

Manor Farm House is a grade II\* listed building constructed in 1876 to designs by renowned architect Phillip Webb. Webb was a major figure in late Victorian architecture producing notable work in the Arts and Crafts style and, as here, in the Queen Anne Revival style. This architectural movements developed in the 1870s and looked back to English architectural traditions (in particular domestic forms from the early years of the 18th century) to create an modest, elegant, dignified and somewhat playful new language in contrast to the earnest and powerful forms of Gothic and classical which had dominated the 19th century to that point.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Chiefly a domestic form (though also used in institutional buildings such as Newnham College Cambridge and King Edward VII Grammar School, King's Lynn) the Queen Anne was often found in urban developments but its use of traditional forms and concern with quality detailing akin to the Arts and Crafts also made it suited to rural settings. In this case the house is associated with functional farm buildings (timber framed barns around a covered yard) and was placed in a working agricultural landscape, not in a suburban villa context.

Since the construction of Manor Farm House Thurston village has grown on its northern side toward the listed building, but there is still considerable undeveloped farmland around it. This is important in maintaining the original character of its setting and relationship with an agricultural landscape. The proposed development would occupy part of this land the open quality of which contributes to the setting of the listed building so the new housing could bring further modern building (up to 65 houses) closer to the listed building. The existing woodland and creation of allotments and playfields on the eastern side of the site could form some degree of 'buffer' area and we would encourage this aspect of the scheme, but the development of housing could erode the rural character of its surroundings and harm its historic significance.

The National Planning Policy Framework (NPPF) identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings can be harmed by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favorably.

We are of the view that the proposed development could result in harm to the significance of Manor Farm House in terms of the NPPF paragraph 132. We would therefore recommend the Council assess this impact and weigh any public benefit delivered by developments against such harm. The proposed housing might deliver such a benefit and the Council should consider this when seeking the 'clear and convincing' justification for the harm required by the NPPF. We would also suggest the potential for increasing landscaping buffer on the eastern side of the site is explored.

## Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 6, 7, 14, 17, 132 and 134 of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU

Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Yours sincerely



David Eve  
Inspector of Historic Buildings and Areas  
e-mail: david.eve@historicengland.org.uk

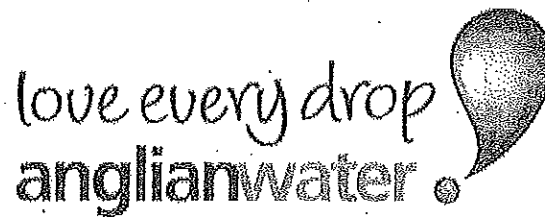


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Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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**Planning Applications – Suggested Informative  
Statements and Conditions Report**

AW Reference: 00019753  
Local Planning Authority: Mid Suffolk District  
Site: 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)  
Planning Application: 5070/16

**Prepared by: Sandra Olim**

**Date: 27 February 2017**

If you would like to discuss any of the points in this document please contact me on 0345 0265 458 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)

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## **ASSETS**

### **Section 1 – Assets Affected**

- 1.1 Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

## **WASTEWATER SERVICES**

### **Section 2 – Wastewater Treatment**

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

### **Section 3 – Foul Sewerage Network**

- 3.1 The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

### **Section 4 – Surface Water Disposal**

- 4.1 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse.

Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

### **Section 5 – Trade Effluent**

- 5.1 Not applicable
-

Your ref: 5070/16  
Our ref: Thurston – land north of Norton Road  
00048539  
Date: 05 March 2017  
Enquiries to: Neil McManus  
Tel: 01473 264121 or 07973 640625  
Email: [neil.mcmanus@suffolk.gov.uk](mailto:neil.mcmanus@suffolk.gov.uk)

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

Dear Dylan,

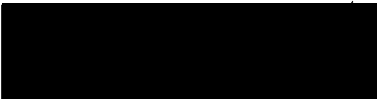
**Thurston: land north of Norton Road**

I refer to the 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).

The County Council responded by way of letter dated 20 February 2017 which is still relevant. However this letter provides an update on two issues, namely:

1. Temporary classroom. Whilst these mitigation requirements may still arise in this respect, the District Council's published 123 List contains 'provision of primary school places at existing schools'. So whilst the cost of the temporary classroom will therefore fall to CIL the District will need to report this to committee as a direct cost consequence arising if planning permission is granted and the scheme is built out. On this basis SCC will make a future CIL funding bid to Mid Suffolk District Council.
2. Suggested planning condition restricting dwelling occupations linked with surplus places available at the catchment village primary school. This is a matter for the District to take a view on when considering the application of the 6 tests set out in the National Planning Policy Framework.

Yours sincerely,



Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Strategic Development – Resource Management

**From:** RM Floods Planning  
**Sent:** 13 March 2017 08:31  
**To:** Planning Admin  
**Cc:** Dylan Jones  
**Subject:** 2017-03-13 JS reply Land at Norton Road Thurston Ref 5070/16

Suffolk County Council, Flood and Water Management can recommend approval subject to the following conditions

Outline Application

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA and include:
  - a. Dimensioned plans and drawings of the surface water drainage scheme;
  - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
  - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to  $Q_{bar}$  or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
  - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
  - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
  - f. Topographical plans depicting all exceedance flow paths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;
  - g. Details of who will maintain each element of the surface water system for the life.

The scheme shall be fully implemented as approved.

*Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site for the lifetime of the development.*

2. Concurrent with the first reserved matters application(s) details of the implementation, maintenance and management of the surface water drainage scheme shall be submitted to and approved in writing by the local planning authority. The strategy shall be implemented and thereafter managed and maintained in accordance with the approved details.

*Reason: To ensure clear arrangements are in place for ongoing operation and maintenance of the disposal of surface water drainage.*

3. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been

submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

*Reason: To ensure all flood risk assets and their owners are recorded onto the LLFA's statutory flood risk asset register*

4. No development shall commence until details of a construction surface water management plan detailing how surface water and storm water will be managed on the site during construction is submitted to and agreed in writing by the local planning authority. The construction surface water management plan shall be implemented and thereafter managed and maintained in accordance with the approved plan.

*Reason: To ensure the development does not cause increased pollution of the watercourse in line with the River Basin Management Plan.*

#### Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003
- The Any discharge of surface water to a watercourse that drains into an Internal Drainage Board catchment may be is subject to payment of a surface water developer contribution

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council

Tel: 01473 260411

Fax: 01473 216864



## Consultation Response Pro forma

1	<b>Application Number</b>	5070/16 Norton Road, Thurston	
2	<b>Date of Response</b>	14.3.17	
3	<b>Responding Officer</b>	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	<b>Summary and Recommendation</b> (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.	1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> <li>• less than substantial harm to a designated heritage asset because it would erode the spacious rural setting of nearby listed buildings.</li> </ul> 2. The Heritage Team recommends that ways of avoiding or minimising this harm be explored, and that the presumption against harm be weighed against any public benefits of the scheme.	
5	<b>Discussion</b> 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><b>Statutory duty</b>          Recent court rulings have confirmed that the statutory duties in the Planning (Listed Buildings and Conservation Areas) Act 1990 have the effect of a strong presumption against harm to listed buildings and their setting. Any harm is to be given great weight in decision-making. Similarly the National Planning Policy Framework expects great weight to be afforded to the conservation of listed buildings and their setting, or greater weight where assets of higher significance are affected.</p> <p>The following assessment applies the method set out in Historic England's advice note GPA3 <i>The Setting of Heritage Assets</i>.</p> <p><b>Heritage assets</b>          The site is a large area of agricultural land and woodland at the edge of the existing settlement. To the east of the site stand Manor Farm, listed Grade II*, and its associated barn complex listed Grade II and now converted. Other heritage assets are at such a distance that the proposed development would have no material impact.</p> <p><b>The setting and significance of assets</b>          The significance of Manor Farm relies mainly on its being designed by Philip Webb, one of the most influential British architects and designers of the late 1800s. Webb was also architect for contemporary alterations and</p>	

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	<p>additions to Nether Hall. Unusually, the Farmhouse is designed in the 'Queen Anne' style, echoing urban brick buildings of about 1700, which contrasted with the more ostentatious gothic revival style of the mid-1800s. It is therefore in the vanguard of architectural design in the 1870s.</p> <p>The barn complex is an example of a Victorian 'model farm' with the added interest of being designed by Webb, although architecturally the buildings are not unusual as Victorian farm buildings.</p> <p>The spacious rural setting of Manor Farm and its former farm buildings makes a positive contribution to their significance. However, Manor Farmhouse does not seem to succeed an earlier building, but is associated historically with Nether Hall to the north. As a later building, its agricultural surroundings make a less important contribution to its significance than would be the case for a traditional farmhouse.</p> <p>Since conversion of the barn complex, the introduction of residential development and activity in the curtilage of the barn dwellings has eroded the agricultural character of the land between them and the application site. Similarly development associated with the keeping of horses has changed the character of land belonging to Manor Farm.</p> <p>The listed buildings stand at a somewhat lower level than the application site, giving a degree of separation from the application site.</p> <p><b>Impact of the proposal</b> The change from farmland to residential and school use would represent a degree of harm in the spacious rural setting of the listed buildings, but because of the factors referred to above the level of harm resulting to the significance of the listed buildings is considered to be low.</p> <p>In accordance with NPPF paragraphs 129, 132 and 134, you should consider whether this harm can be avoided or minimised, and whether it is justified in terms of public benefits.</p>
<p>6 <b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are</p>	<p><b>Mitigation of harm</b> It seems clear that much of the site is capable of development with relatively little potential impact on the setting of the listed buildings. However in the illustrative layout accompanying the application development is shown reaching the eastern boundary of the site, where it is most likely to affect the setting of the listed buildings. The layout also shows significant areas of open space and new woodland planting. It would be worth exploring</p>

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	proportionate	whether the layout can be arranged so as to allow for a green buffer along the site's eastern boundary which would serve to sustain a more rural character in the setting of the listed buildings.
7	<b>Recommended conditions</b>	

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.

**From:** Thurston Parish Council [mailto:info@thurstonparishcouncil.gov.uk]  
**Sent:** 17 March 2017 10:10  
**To:** Planning Admin; Phillip Isbell; Trevor Saunders  
**Subject:** FW: Saved search results and Tracked Applications have been updated

For the attention of: Dylan Jones

Dear Dylan,

As the case officer tasked with dealing with the Planning Applications listed below may I please confirm that the responses from both Thurston Parish Council and Thurston Neighbourhood Plan Team should be read as one overall response and should form part of the Parish Council's Statutory Consultee response.

**Ref: 4386/16 Erection of 138 dwellings. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space - Land on the west side of Barton Road, Thurston IP31 3NT**

**Ref: 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 the provision of a new Primary School, including details of access on land west of Ixworth Road. - Land west of Ixworth Road, Thurston IP31 3PB**

**Ref: 5070/16 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) - Land at Norton Road, Thurston**

**Ref 4942/16 Residential development consisting of 64 dwellings and associated highway, car parking and public open space - Land at Meadow Lane, Thurston IP31 3QG**

**Ref 5010/16 Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16 - Land to the south of Norton Road, Thurston IP31 3QH**

Should you have any queries on this matter perhaps you would be kind enough to contact me.

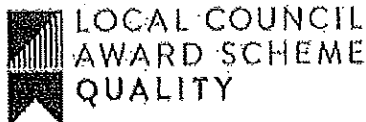
Kind regards

*Vicky*

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

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Planning Services  
Mid Suffolk District Council,  
131 High Street,  
Needham Market,  
Suffolk IP6 8DL

21/03/2017

For the attention of: Dylan Jones

**Ref: 5070/16; Land at Norton Road, Thurston**

Thank you for consulting us on the outline planning application 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)

This letter sets out our consultation response focusing on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

#### **Recommendations**

In terms of the likely visual effect on the surrounding landscape, the proposal will significantly change the character of the site, from agricultural land to residential. However, the existing landscape envelope within and around the site, (combined with the proposed landscape mitigations included as part of the application) provide an adequate strategy to suitably reduce the visual impact of the development.

The following points highlight our key recommendations for the submitted proposals:

- 1) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years to support plant establishment.
- 2) Sustainable urban drainage system (SuDS) features such as detention basin and others with landscaping elements should also to be included on the landscape management plan and ensure that adoption is in place prior construction. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics,
- 3) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, to support plant establishment. SuDS features such as detention basin and others with landscaping elements are also to be included on the landscape management plan and ensure that adoption is in place prior construction.
- 4) If the application is approved, an appropriate detailed boundary treatment plan and specification will need to be submitted.



Our Ref: 570/CON/5070/16  
Date: 3<sup>rd</sup> April 2017  
Enquiries to: Steve Merry  
Tél: 01473 341497  
Email: steven.merry@suffolk.gov.uk

NAME Mr Anthony Palmer  
ADDRESS Pigeon Capital Management 2 Ltd  
Salisbury House,  
Station Road,  
Cambridge,  
United Kingdom,  
CB1 2LA

Dear Mr Palmer

**Interim Reply to 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 or access) for Land at Norton Road, Thurston**

This letter is complimentary to that ref 570/CON/5070/16 dated 10<sup>th</sup> 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 the additional issues that the Highways Authority has identified are specific to this application.

#### Site Access from the public highway

Drawing 618212/Sk11 shows the green line for highway works at the rear of the kerb line. This does not allow for construction and maintenance of a culvert across the ditch nor installation of utility apparatus.

The alternative access shown on drawing 016-032-007 could be acceptable if agreement is obtained from the developer to the south of Norton Road to modify the layout of their site and that detailed design drawings including visibility and pedestrian / cycle facilities are provided.

Visibility splays for the junction with public highway are stated as 2.4m x 120m in the Transport Assessment which is acceptable based on the speed data provided (85<sup>th</sup>ile EB 40.9mph / WB 43mph). However, it is noted by retaining the hedge along the north side of the road the area retains a rural character and compliance with the signed 30mph speed limit is poor, as is reflected by the speed data. It is also noted that the speed data taken from Norton Road adjacent to site, not at the edge of the splay.

#### Internal Highway layout

Although all matters are reserved except for access, we would nevertheless make the following comments on the indicative internal highway layout with a view to assisting with reserved matters.

The main access road is scaled at 5.5m but this will need to be confirmed as part of this application and swept path analysis provided to show access is possible for likely vehicular use.

Within the site visibility has been design for a 20mph speed limit. This may be accepted for shared space carriageways but it would not be acceptable for local distributor roads. Therefore, a MfS design for visibility for 30mph should be used (i.e. access x-distance 2.4m and stopping sight / y-distance of minimum 43m).

Access for plot no's 22 to 30 is off Meadow Lane and the driveways shown on 016-032-001 do not connect with the carriageway and cross the ditch east of Meadow Lane. Meadow Lane is also narrow. Further details of the access layout will be required to satisfy us that this is practical as part of this application.

#### Car parking

To be dealt with at reserved matters stage but complies with SCC guidance.

#### Footway and cycle connectivity

The proposed internal footway along the site boundary with Norton Road only runs to the eastern site access and there is no connection to Norton Road at this point. A footway connection should be made with Norton Road as far to the east as practical (near plot 40) to provide an alternative route for pedestrians.

It is desirable to provide a cycle and pedestrian connection across Norton Road to the proposed development to the south if the alternative access shown on drawing 016-032-007 is not provided.

#### Public Rights of Way (PRoW)

No PRoW are within the site limits. However, two (Thurston 001 and 007) connect with the north end of Meadow Lane to the NW of this site. Connectivity with these footpaths does not appear to have been included in the masterplan. Thurston 001 forms a significant link between the site and Ixworth Road, Thurston Community College, and probable future developments on Ixworth Road. Therefore, S106 funding for improvements to this footway will be requested.

#### Landscaping

Drawing 618212/Sk11 shows a tree lined avenue proposed as part of the detailed planning application. This layout will not be accepted within the public highway unless a) the soils are not susceptible to shrinkage b) details are submitted showing that utilities are located away from and protected from damage due to tree roots and c) details of protection of the highway infrastructure are submitted. The positioning of the trees is likely to compromise street lighting.

#### Road Safety

The data available indicates that the single significant location with a high frequency of crashes is at the junction of C693 Thurston Road / C692 Thurston Road / C693 New Road and not Thredwastre Road / New Road as stated. It is proposed that mitigation measures are undertaken at the Thurston Road / New Road junction.

#### Public Transport

The nearest bus stop is approximately 500m from the site. If practical it is proposed that additional bus stops and shelters are placed either side of Norton Road to the east of Rylands Close.

#### Trip Generation

The Trip rates and modal splits are considered acceptable.

### Junction Assessment

It is noted that four junctions were modelled

- Junction 1: Norton Road / Church Hill / Pakenham Road
- Junction 2: Norton Road / meadow Lane / Sandpit Lane
- Junction 3: Station Hill / Barton Road
- Junction 4: Beyton Road / Thurston Road / Thedwastre Road

The A143 / Barton Road was not included, although 15% of the vehicles are expected to use this route. Modelling from other developments indicates that this junction is operating at or close to capacity in the peak periods and any additional traffic may have a severe impact. This matter is addressed in the letter regarding the cumulative impact of the five developments.

The flow diagrams used for modelling of the AM peak the Norton Road East approach to the Pakenham Road junction seems to not agree with the traffic survey. It is also thought that there may be some confusion over the approaches to the Thurston Road / Thedwastre Road crossroads, when compared to the survey. These should be reviewed.

### Proposed Highways S106 Heads of Terms

- Improvements to PRoW Thurston 001 between Meadow Lane and Ixworth Road
- Improve PROW 007 (un metalled) north of Meadow Lane
- Contribution towards extension of speed limit on Norton Road
- Contribution towards bus stops and shelters either side of Norton Road to the east of Rylands Close
- 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 improvement

### Proposed S278 works

- Uncontrolled footway / cycleway crossing on Meadow Lane
- Footway on north side from Meadow Lane east towards Church Lane (if one is not included in S38 agreement).
- Crossing between Hopkins site and Pigeon site (un-controlled)

The S278 and S106 proposals are based on the assumption of a collaborative approach as outlined in our letter of the 10<sup>th</sup> 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



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131 High Street,  
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Suffolk IP6 8DL

21/03/2017

For the attention of: Dylan Jones

**Ref: 5070/16; Land at Norton Road, Thurston**

Thank you for consulting us on the outline planning application 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)

This letter sets out our consultation response focusing on the landscape and landscape impact of the planning application and how the proposals relate and respond to the landscape setting and context of the site.

#### **Recommendations**

In terms of the likely visual effect on the surrounding landscape, the proposal will significantly change the character of the site, from agricultural land to residential. However, the existing landscape envelope within and around the site, (combined with the proposed landscape mitigations included as part of the application) provide an adequate strategy to suitably reduce the visual impact of the development.

The following points highlight our key recommendations for the submitted proposals:

- 1) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years to support plant establishment.
- 2) Sustainable urban drainage system (SuDS) features such as detention basin and others with landscaping elements should also to be included on the landscape management plan and ensure that adoption is in place prior construction. This is to ensure appropriate management is carried out and to maintain functionality as well as aesthetics,
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- 4) If the application is approved, an appropriate detailed boundary treatment plan and specification will need to be submitted.



### **Review on the submitted information**

The submitted planning application includes a Landscape and Visual Impact Assessment, Design and Access Statement, Illustrative Masterplan and a Landscape Statement.

The submitted Landscape and Visual Impact Assessment (LVIA) is a thorough report which concisely assesses the impacts and effects and proposes appropriate mitigation measures. The LVIA report includes a detailed analysis of the site, the surrounding landscape and how the proposals seek to mitigate the impact of the development over the short, medium and long term. The LVIA report carries out an analysis of 13 viewpoints which informs the mitigation recommendations to be implemented as part of the development layout.

### **Proposed mitigation**

The Landscape Statement provides a clear methodology for the landscape strategy which includes plant species, landscape character, public open space provision and public realm, surface materials. The Landscape Statement proposes a clearly considered green infrastructure which adequately mitigates the impact of the development. The indicative layout includes a good range of public realm and public open spaces with high amenity value.

Views to the development identified on the LVIA have been adequately mitigated through planting along edge boundaries and within the residential development helping to screen and filter those critical views.

As part of sustainable drainage and in addition to the proposed balancing ponds, there are further opportunities for open swales, rain gardens or similar attenuation techniques across the site and along main route through the development.

Yours sincerely,

Almudena Quiralte BA (hons) DipLA, ALI  
Landscape Architect Consultant  
Telephone: 03330136858  
Email: almudena.quiralte@essex.gov.uk

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



**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](mailto: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

**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 £1 million, which equates to £1209.19 per dwelling.

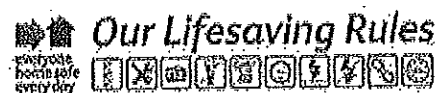
Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied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

Network Rail  
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London NW1 2DN  
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E: [Wasil.khan@networkrail.co.uk](mailto:Wasil.khan@networkrail.co.uk)  
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**From:** [planningadmin@midsuffolk.gov.uk](mailto: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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GCMS Ref:	65246864
Version:	2
Date:	25/08/2015

# Level Crossing Development Team (LCDT) Feasibility Report Thurston Station Level Crossing



Project Name:	Anglia Closure Feasibility Studies – Package 5
Business Plan or OP Reference:	144179
Client:	Mark Brunnen
Sponsor:	Sean Cronin

Prepared By: (Development)	Name: Hugo Nobrega
	Job Title: Project Development Assistant
	Date: 06/08/2015
Prepared By: (Engineering)	Name: Vanessa Kettlestring
	Job Title: Senior Civil Engineer
	Date: 04.08.2015
Checked and Approved By: (Development)	Name: George Onaya
	Job Title: Senior Project Development Manager
	Date: 04.08.2015

**GRIP**

*Governance for Railway Investment Projects*

Page 1 of 17

GCMS Ref:	65246864
Version:	2
Date:	25/08/2015

### ISSUE RECORD

Revision No	Prepared by	Issue date	Comments
0.1	RJ	12/06/2015	Working draft
0.2	AK	15/06/2015	Peer Review
0.3	HN	06/07/2015	Peer Review/ Working Draft
0.4	CH2M	21/07/2015	Added civil engineering sections/text
1	HN	04/08/2015	First Issue for feasibility workshop
2	HN	25/8/2015	Final Issue

CCMS Ref:	65246864
Version:	2
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## Contents

ISSUE RECORD	1
1. Project Scope & Requirements	4
2. Diversity Impact Assessments	5
3 Options Report & Concept Designs	5
4 Compliance with Route Requirements Document	7
5 Constructability Assessments	7
6 Geotechnical Hazards	8
7 Civil Engineering Considerations	9
8 Cost Estimates	11
9 Business Case Appraisal against Whole Life Costs	12
10 Programme	12
11 Key Risks	12
12 Assumptions	13
13 Access Strategy	14
14 Interface with other Projects	14
15 Impact on Stakeholders	14
16 Consents Strategy	15
17 Environmental Appraisal	15
18 Engineering Outputs	15
19 Contracting Strategy	15
20 GRIP 2 Deliverables	16
21 Conclusion and Recommendations	16
22 Client and Stakeholder Acceptance	16
23 References	17
24 Appendices	17

CCMS Ref:	65246864
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## 1. Project Scope & Requirements

The Feasibility Report is a 'Governance for Railway Investment Projects' (GRIP) stage 2 deliverable and its purpose is to document all feasible options and make an initial Single Option recommendation for consultation with key stakeholders.

The scope of this report is to demonstrate that feasible closure options for Thurston Station Level Crossing have been explored during GRIP Stage 1 to 2.

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. All feasible closure options shall be considered throughout the report.

This report relates to Thurston Station Level Crossing which is within the scope of 'Anglia Closure Feasibility Studies - Package 5'.

The 'Anglia Closure Feasibility Studies - Package 5' Project also contains the following Level Crossings; Bloss, Ellingers, Maltings, Melton Sewage, Jetty Avenue, Kingston Farm, Dock Lane and Melton Station. These level crossings are all on the Coldham Lane to Haughley line.

The level crossing is currently a Station Platform Crossing (SPC) protected by Miniature Stop Lights (MSL) and spoken audible warnings. The level crossing is located on Engineers Line Reference (ELR) CCH, 32m 54ch and supervised by Colchester Signal Box. Thurston Station level crossing Fatalities and Weighted Injuries (FWI) score is 0.001790697 and All Level Crossing Risk Model (ALCRM) score is D4.

The level crossing is located at the Elmswell end of Thurston Station (managed by Abellio Greater Anglia). The level crossing provides access from the down side and acts as the only means of accessing the up platform.

The station building has been closed for some years. This is believed to have originally provided access to up platform (platform 1) via a subway. When the station building was closed, access to the up platform was provided by the provision of the level crossing. The down platform (platform 2) is accessed directly from the station car park and has no level crossing requirement. Fig1- Thurston Station location map:



Thurston is a medium sized village east of Bury St Edmunds in the county of Suffolk. Around the station there is a mix of old and new residential properties and a number of medium sized businesses.

The main usage over the level crossing today is pedestrian traffic; the level crossing provides the only access to platform 1 (up side).

**GRIP**

**Governance for Railway Investment Projects**

Page 4 of 17

CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

## 2. Diversity Impact Assessments

From September 2014, reclassification means that Network Rail needs to respond positively to the Public Sector Equality Duty. This part of the Equality Act 2010 requires public bodies and organisations that carry out public functions to consider people with protected characteristics when doing so.

Diversity Impact Assessments (DIAs) are the method Network Rail have chosen to demonstrate due regard to duties pursuant to the Equality Act 2010. A DIA is a tool that helps to make sure that Network Rail policies, projects and design, build and operate services works well for people with protected characteristics.

A DIA assesses the likely effects of our work on people who share the protected characteristics of age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. The duty to have due regard to the need to eliminate discrimination also covers marriage and civil partnerships. Once any potential negative impacts have been identified, the DIA can be used to plan ways to remove or mitigate these, wherever possible.

The LCDT have taken the following steps to identify any negative impacts to users at the crossing:

1. Desktop assessment identifying local infrastructure that may create usage trends at the crossing (Hospital, Place of Worship etc).
2. Site visit to access local environment.
3. 9 day census.
4. Consultations with local Network Rail stakeholders including teams from maintenance, risk and operations.

The closure of Thurston Station level crossing could impact on journey times, and effort required for those currently using the crossing. This option could potentially also impact on people with the following protected characteristics:

- Disability
- Age
- Pregnancy/maternity

The proposed option will add additional journey time and effort which could particularly impact on disabled people. The new route could lead to additional time and effort for disabled people and additional signage could confuse and distress those with learning disabilities in the short term. The longer detour will also impact on persons whose mobility is reduced because of their age; they will have to navigate a longer detour by using the ramp. Steep gradients on the ramp could present a real challenge to those who are heavily pregnant, pushing a pram or walking with small children.

The proposed closure option will have an overall positive impact on the protected characteristics mentioned above. This is because the provision of grade separation with the railway eliminates the risk posed by train strikes to this group which is vulnerable as a result of reduced mobility, hearing, vision or distractions.

In closing the level crossing we would want to continue to provide appropriate access to the station platforms and amenities.

## 3 Options Report & Concept Designs

The closure options assessed for Thurston Station Level Crossing were:

- Closure and diversion via existing routes
- Closure and construction of footbridge
- Closure and construction of underpass
- Closure and construction of underpass and pedestrian ramp

**GRIP**

*Governance for Railway Investment Projects*

Page 5 of 17

CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

- Closure and construction of pedestrian ramp, layby and change to public road /footpath layout
- Reinstate subway in situ

### 3.1 Non-Feasible Options

The following options were reviewed and assessed as not feasible.

#### 3.1.1 Closure and diversion via existing routes

No other access route is available

#### 3.1.2 Closure and construction of footbridge

A footbridge would require ramps for access by users with pushchairs, wheeled luggage as well as mobility impaired users in accordance with the Equality Act.

This option is not feasible due to lack of space for the ramps, particularly on the Down side where land is used for car parks, businesses and residential properties. The footbridge would overlook properties and would require more than one set of ramps than option 3.2.1.

#### 3.1.3 Closure and construction of underpass

This option was discounted due to the railway and platforms built on an embankment. An underpass on its own would leave no access to platform 1 on the Up side from ground level.

#### 3.1.4 Closure and construction of underpass and pedestrian ramp

Pedestrian subways passing under the railway should comply with the applicable requirements for an underline bridge with stairs and ramps being in accordance with the requirements detailed for footbridges.

Based on site layout there were two locations considered for siting a subway: in the same position as the level crossing, and at the other end of the station between the station building and the bridge. The topography at the level crossing comprises a steep slope on the Up side of the line and a near level/gently sloping on the Down side. A subway here would require ramps leading down into the subway from the Down side. These ramps and side walls would take up a large part of the existing station car park and private land. Ramps would be required on the south side of the subway to enable passengers to access Platform 1 which would be at a higher level to the subway. Due to the impact on the station car park and adjacent properties this option has been discounted.

To locate a new subway nearer the underbridge would have the benefit of the line being on steep embankments but the dis-benefit of requiring ramps up to both platforms. Due to space restrictions for the ramps and significant construction works to build the subway with minimal impact on the lines and the existing platform foundations this option has been discounted.

#### 3.1.5 Reinstate subway in situ

Historically, a subway ran from inside the mezzanine floor of the station building on the Down side, under the railway and exited onto Beyton Road with steps leading up to Platform 1 (Up side). The station has been closed for some time and the subway has filled in.

### 3.2 Feasible Options

The following options were reviewed and assessed as feasible.

#### 3.2.1 Closure and construction of a pedestrian ramp, layby and changes to the public road and footpath layout

Closure is possible with the construction of a ramp, from Platform 1 (Upside) down the embankment leading onto Beyton Road. The design is to include a drop off point / layby for vehicles.

GCMS Ref:	65246864
Version:	2
Date:	25/08/2015

The current arrangement consists of the main car park and medium sized businesses (Down side). Pedestrians currently use the footpath crossing to change from Platform 2 (Down side) to Platform 1 (Up side) as this is the only access.

With this proposed option, the diversion route is approximately 4-5 minutes via Beyton Road and Station Hill, passing under a rail bridge. The rail bridge currently has a very narrow footpath. In order to provide a suitable diversion the footway would need to be widened. Due to physical restriction of the walls of the bridge it is impossible to do this without decreasing the width of the vehicle carriageway.

To continue to accommodate vehicles passing under the rail bridge, if the vehicle carriageway width was decreased, a change of the road layout would be required. It is proposed to:

- Introduce single lane traffic through the bridge - controlled by new traffic light control at both ends. The path of the vehicles would be through the centre of the bridge arch, allowing the footpath to be widened and reduce the number of bridge strikes. This would require horizontal re-alignment of the road to provide a straight, rather than curved approach to the underbridge which would reduce bridge strikes.
- Remove the current mini-roundabout and have a continuation of Beyton Road and Barton Road

This would reduce blocking back and introducing a one way system through the bridge.

This option would require land ownership and agreement by local authority / highways. This option will be subject to a Road Safety Audit (RSA).

#### **4 Compliance with Route Requirements Document**

A Route Requirements Document (RRD) has been produced for 144179 Anglia Closure Feasibility Studies - Package 5.

Compliance with the requirements contained within will be via the LCDT internal deliverable management process and stage gate review.

#### **5 Constructability Assessments**

The desk study of the ground conditions indicates that the ground beneath any structures would require improving or pile foundations due to the unconsolidated nature of the near surface deposits (Head deposits). Given the location of the proposed passenger access ramps it is suggested that pile foundations be employed.

The passenger access ramp design is based on Network Rail standard details with no modifications. This should enable an efficient manufacture and construction programme.

To minimise the number of possessions required the majority of the construction work should be done from the area south of the railway. Access for construction plant could be gained from Beyton Road. The construction sequence would need to consider the exit strategy for plant as the access is very narrow. The piling rig could work backwards from the eastern extent and finish piling near the existing gateway. Due to the constrained space where the ramps are proposed it would be necessary to position the lifting crane in the car park of the adjacent car service garage. Agreement would be required first from the landowner. If agreement was not reached then the piling operation would need to be from the track under possession or alternative ground improvement works carried out.

The highway works would be carried out using lane and road closures. Sandpit Lane and Norton Road are considered suitable for temporary traffic diversions subject to approval by the local

CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

highways authority. Works under the bridge would require smaller excavation plant due to the reduced height clearance.

The alignment of Beyton Road on a left hand curve to the junction with New Road results in a wide swathe of verge being required for forward visibility to the primary traffic signal. Ideally this should be 90m for the speed of the road but this would require land from a residential property. The proposed layout only shows land take from the adjacent wooded area and a reduced visibility to 70m (a one-step reduction in standard according to the Design Manual for Roads and Bridges TD9/93). This would need agreement by the local highway authority and be considered as part of a road safety audit.

From the ordnance survey maps and site visit there appears to be sufficient space within the Network Rail boundary for the structure and within the highway and 'open' spaces for the proposed highway layout. The exact extent of Network Rail land on the Up side of the railway needs to be checked by a full topographical survey as this area is constrained by the boundary with Cracknell's garage and the embankment that supports the railway. Agreement will need to be sought with the owners/tenants of Cracknell's garage for plant access as this could affect the proposals and/or the construction strategy.

The results of the topographical survey and early consultation should be used to determine the optimum design for the ramp. The proposals show a skewed steel structure but a solid structure cut into and retaining the railway/embankment could be an alternative option to optimise the space available.

A topographical survey should be carried out to verify the height clearances for high vehicles and the road kerb lines to enable the proposed highway layout to be checked and optimised.

A ground investigation should be carried out to verify the composition and structural properties of the railway embankment and the ground conditions for the piled foundations of the ramps.

Standard non-disruptive possessions are available each Saturday night for approximately 8hrs based on the Engineering Access Statement for 2013. A single possession should be sufficient for the removal of the foot crossing and the construction of the tie-in of the passenger access ramp. Further non-disruptive possessions are available on the Sunday night and mid-week nights if required.

The existing access to Platform 1 would need to be kept open until the new means of access was constructed and fit for use.

## 6 Geotechnical Hazards

### Introduction

Thurston Station is sited on a sequence of undifferentiated chalk deposits from the White Chalk Subgroup from the Cretaceous Period and is overlain by a thin layer of superficial deposits known as Head deposits from the Quaternary Period (BGS, 1982). The Chalk extends like a protruding finger southwards from the main outcrop of Chalk to the north and west. The finger of Chalk is surrounded by Crag Group deposits from the Quaternary and Neogene Periods. Crag Group deposits typically consist of semi consolidated sands and gravels, where as the Head deposits consist of unconsolidated clays, sands and gravels. Made Ground although not identified on the geological map is likely to be present. See Drawing No 144179-THJ-TS-DRG-00021 'Geotechnical Features and Hazards' in Appendix B.

Further descriptions of the geology and on site ground conditions including structural and hydrogeology explanations are given in Appendix C. The geotechnical hazards associated with deposits of Made Ground, Head, Crag and Chalk are discussed below and in the geotechnical risk register, Table 5 in Appendix C. Recommendations for a ground investigation are contained in Appendix C.

### Made Ground

There is potential for any made ground associated with the rail network, for example the railway embankment, and previous land use of the site to contain contaminated soils. The soils may also

**GRIP**

*Governance for Railway Investment Projects*

Page 8 of 17



CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

contain high levels of sulphate which potentially could be aggressive to buried concrete. Groundwater may be present at shallow depths in any made ground deposit.

#### Superficial Deposits

The Head deposits are likely to be up to a couple of metres in thickness and could potentially cause problems for excavation. Head deposits are recognised for having extremely low angle shear planes, therefore any design needs to take this into account. Head deposits make particularly poor foundation soils due to their unconsolidated nature. Groundwater may be present at shallow depths, which can cause problems during shallow excavation.

#### Crag Group

Shallow or deep excavations below the water table in loose sandy gravelly materials will encounter stability problems. Appropriate shoring and dewatering techniques will be required to maintain a stable excavation.

Aquifer protection measures will be required for any ground investigation and construction works undertaken within the Minor Aquifer.

#### Chalk

The most significant geotechnical hazard associated with the proposed development is the presence of dissolution features in the Chalk bedrock. Ground dissolution occurs when water passing through soluble rocks produces underground cavities and cave systems. These cavities can cause localised collapse of the overlying rocks and superficial deposits, near surface cavities, subsidence and sinkhole formation, uneven rockhead, reduced rock-mass strength, and rapid groundwater flow. In rare cases, subsidence can occur following collapse of soils above cavities. The associated engineering problems include irregular rockhead and weathering profile, localised subsidence, and increased mass compressibility and diminished rock mass quality. Sinkhole formation and subsidence has the potential to cause damage to buildings and infrastructure such as roads, railways, pipes and drains. Manmade cavities such as chalk/flint mines or dene holes (caves) may also be present and be subject to the same geotechnical hazards as natural cavities.

Chalk is particularly susceptible to weathering and frost penetration which affects all chalks within 0.5m of the ground surface (CIRIA, 2002). Frozen chalk becomes very weak and compressible on thawing, leading to heave and differential settlement of supported structures and pavements. It is significant for unsupported cut slopes where frost action leads to a gradual degradation of the slope face.

The Chalk is likely to contain large, tabular flint nodules and hard chalk bands which could cause problems during excavation or during pile driving.

The Chalk is designated as a Principal Aquifer and as such pollution prevention measures and aquifer protection should be implemented to avoid contamination during any ground investigation or construction works.

## 7 Civil Engineering Considerations

Table 1: Site Information

Item	Details
Site Name and Address	Thurston Footpath LC, Thurston Station. Station Hill, Thurston, Bury St Edmunds, IP31 3QU.
Location	ELR: CCH, mileage: 32M 54ch. The National Grid Reference Coordinates are LAT 52° 14' 59"N LONG 0° 48' 30"E (TL 918650).
Structures	The site comprises the railway and the pedestrian crossing point. The crossing is adjacent to an informal parking area. The site is

**GRIP**

*Governance for Railway Investment Projects*

CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

Item	Details
	close to Thurston Station which comprises a station building (closed) and two platforms. The Station building and railway bridge are both designated Grade II listed buildings.
Track and electrification	The railway consists of two tracks and is not electrified.
Boundaries	The railway runs in an approximate east-west direction through the site. The pedestrian crossing runs in a north-south direction across the site and to the immediate east of the station. The line is adjacent to business units on both the north and south, with the crossing linked to an informal car park on the north side of the track.
Topography	The site has an approximate elevation of 50.0m AOD.
Access	Site access is via a small car park off Station Hill road to the north only. The crossing provides the only access to Platform 1 at Thurston Station.
Rights of way	There are no public rights of way in the vicinity of the crossing.
Route classification	Secondary.

### 7.1 Traffic Issues

A 9-day census was carried out at the foot crossing by Sky High in April 2015. The total pedestrian count over the 9-day period was 1170 with these predominantly being adults. A small proportion of the users were accompanied and unaccompanied children, elderly people or people pushing a pram. The busiest day was recorded as being Day 7 (Friday) of the census with a total user count of 205. For pedestrians, the busiest quarter hourly period occurred at 17:45 on Day 8 (Saturday) with 39 pedestrians.

A large community college is situated 0.5 miles north of the station crossing, and a primary school is 0.7 miles away. A morning and evening peak was observed which may be due to pupils travelling to these schools or to commuters travelling to nearby towns and cities.

### 7.2 Highway Design Requirements

The preferred option is for a diversion of pedestrians via the existing road/footway network and a new connection to the Up line. The route is shown on Drawing No 144179-THJ-TS-DRG-00020 in Appendix D. It passes under the brick arched railway bridge (No 152CCH) which has a height restriction for road traffic of 13' 9" (4.19m). The existing road markings on the approaches and under the bridge demarcate a line for high vehicles (less than 13'9") to follow to avoid hitting the curve of the arch. There is a footway either side of the road here. The existing footway on the west side narrows from approximately 1.8m to 0.5m and then ends just south of the bridge. The footway on the east side widens from approximately 0.76-1.09m in a southerly direction. The footway on the east side would need to be widened to be suitable for the diverted pedestrians. This would necessitate narrowing the road to a single lane under the bridge and the installation of a traffic light control system. Guidance suggests that the footway should be widened to a minimum of 2.0m, with a preferred width of 2.6m. Due to the alignment required for the single lane road under the bridge the footway can only be widened to circa 2.0m.

With the existing highway arrangement, Beyton Road and Station Hill are within close proximity to the bridge. Due to visibility constraints and space constraints for the swept paths of vehicles it would be necessary for Barton Road, Station Hill, New Road and Beyton Road to all become signalised. Drawing No 144179-THJ-TS-DRG-00020 shows a potential layout for this option.

**GRIP**

*Governance for Railway Investment Projects*

Page 10 of 17

CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

The proposed layout shows a passenger access ramp from the footway south of the bridge up to the level of Platform 1. The ramp ties into the level area currently forming the end of the level crossing adjacent to the platform ramp. The layout shows the passenger access ramp leading down from Platform 1 at a skew to avoid cutting into the embankment which supports the railway. Detailed topographical and geotechnical surveys will be required prior to further design of the ramps.

### 7.3 Civil Engineering Assumptions

Table 2

*Civil Engineering Design Assumptions Log*

No	Assumption
1	Assumed that the local highway authority use the DMRB for highway design.
2	Assumed that the passenger access ramp will require lighting.
3	Assumed that the traffic flows recorded in the 9-day traffic census are typical flows throughout the year.
4	Assumed that a full scale ground investigation will be undertaken to investigate the ground and geo-environmental conditions.
5	Assumed that the existing platforms are built on piles. Modular frame founded on concrete pads in the embankment slope. Concrete pads assumed to be pile caps.
6	Assumed that loss of the car park areas north of the railway would be unacceptable to NR and stakeholders.
7	Assumed an embankment height of 5m.
8	Assumed that the modular ramp design as per NR standard details will be used. The alternative would be a solid construction with retaining walls.
9	Assumed that reductions in sight distances to traffic signals will be acceptable to the highways authority.
10	Assumed that there will be no damage or alterations to Thurston Station and Railway bridge Grade II listed buildings.
11	Assumed that there are no hidden obstructions that could affect the proposed road layout or the location of the passenger access ramps.

## 8 Cost Estimates

The budgetary estimates below are built up using 2011 rates from Spon's Civil Engineering and Highway Works Price Book and estimates of quantities for the significant elements. Then engineering judgment and optimism bias percentages have been added to account for the elements that have not been quantified and what is unknown at this stage.

The optimism bias of 44% has been applied based on advice contained in the supplementary Green Book (Appraisal and Evaluation in Central Government) guidance on optimism bias. The percentage applied can be reduced as the design progresses and more detail is known and risks reduced or removed.

Possession lengths will depend on the structure option chosen but a figure obtained from Network Rail for a weekend possession has been used in the calculations.

**GRIP**

*Governance for Railway Investment Projects*

CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

Land costs have been derived using the footprint for the alignment and the current rate for an acre of bare land which according to RICS (Royal Institution for Chartered Surveyors) is £8223. This figure could be higher if the land is quality arable land or designated for development. The land cost estimate does not include for potential compulsory purchase order processes.

The percentage costs for Network Rail input can vary between 6% and 12%. Based on the type of work involved for the proposed works 10% has been the figure used for this cost estimating exercise.

As the construction costs have used 2011 rates the construction price indices have been used to bring the cost estimates up to Quarter 3 2014 prices.

The estimated cost breakdown for the preferred option is contained within Appendix E.

The estimated costs for the closure, construction of a pedestrian ramp, layby, change to the public road and footway layout is £1.0M.

## 9 Business Case Appraisal against Whole Life Costs

It was not deemed necessary to run Whole Life Cost Modelling (WLCM) on these options as would only be comparison of capex costs.

## 10 Programme

The indicative timescales summarised below are the anticipated durations from the start of GRIP Stage 4 to commissioning for each option. These are built up using generic project schedules wherever possible. The timescales include a 20% allowance for optimism bias.

*Closure, construction of a pedestrian ramp, layby, changes to the public road and footway layout* 36 months

Note: The indicative timescale shown above includes a 12 month allowance for highway authority liaison and land purchase.

## 11 Key Risks

Risks associated with the progression of the preferred option are detailed below in Table 3. Other risks associated with safety of the works, such as unknown ground conditions and buried services, are covered in the Design Risk Assessment in Appendix F.

Table 3

Risk Item	Risk Description	Risk Level	Reason for risk level	Mitigation measures
Objection to proposals by the local highway authorities	Potential objection to proposed road layout changes and traffic control system.	High	Affects local authority assets, road safety and maintenance legacy	Early negotiation and agreement with stakeholders.
Objection to proposals by landowners	Potential objection from land owners to the taking of the wooded area for construction of a road.	High	Proposals affect area of woodland.	Early negotiation and agreement with landowners.
Objection to proposals by stakeholders	Potential opposition from passengers regarding the closure of the level crossing and the diversion length.	High	Diversion adds time to journeys.	Early negotiation and agreement with stakeholders.

**GRIP**

Governance for Railway Investment Projects

Page 12 of 17

CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

Risk Item	Risk Description	Risk Level	Reason for risk level	Mitigation measures
Objection to proposals by stakeholders	Risk of opposition to traffic signal controlled junction in close proximity to housing.	Medium	Traffic light controlled junction could increase light and noise pollution.	Early negotiation and agreement with stakeholders.
Objection to construction strategy by stakeholders	Risk of refusal to use Cracknell's garage car park for construction plant by owners/tenants.	Medium	Proposals affect the business	Early negotiation and agreement with stakeholders.  If agreement cannot be obtained then an alternative construction strategy will be required.
Objection to proposals by stakeholders	Potential objection to design of proposed passenger access ramps	Low	Does not affect land or assets owned by others but would create visual impact on landscape. This has been minimised by the proposed location of the ramps behind the car garage.	Early negotiation and agreement with stakeholders.
Space constraints	Risk that there is not enough space within the NR boundary for the proposed ramps	Medium	OS map indicates sufficient space but footprint for ramps is tight up to the boundary.	Carry out topographical survey early in the next stage.
Stakeholder management	Risk that stakeholders are missed or not properly consulted leading to objections to the proposals.	Medium	All stakeholders to a project are not easily recognised and those that are consulted can require various means of communication and negotiation techniques.	Ensure the stakeholder list is robust and skilled personnel carry out the consultation processes.
Transport and Works Act (TWA) could not be granted	Risk that the TWA is applied for but is not granted by the Secretary of State as the proposals are considered unacceptable following numerous robust objections.	Low	Project provides safety benefits to level crossing users.  Initial design has considered potential stakeholder issues and mitigated where possible.	Early negotiation with stakeholders and development of mitigation measures.

## 12 Assumptions

- Closure options will be accepted by external stakeholders

**GRIP**

*Governance for Railway Investment Projects*

Page 13 of 17

CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

- Funding will be made available for the scheme
- It is assumed the Highway Agency will adopt the new road layout and the traffic light system.

### Access Strategy

If agreement is given to use adjacent land for the lifting crane and material store then closure and diversion of pedestrians via the underbridge and an access passenger ramp south of the line would require minimal access to the railway other than the connection of the ramp to Platform 1 and recoveries. If agreement is not given, then the ramp components would need to be lifted into position using a track mounted crane and either multiple non-disruptive possessions or a disruptive weekend possession.

The construction of the tie in to Platform 1 and the removal of the foot crossing would need to be carried out under a rail possession. Standard non-disruptive possessions are available each Saturday night for approximately 8hrs based on the Engineering Access Statement for 2013. A single possession should be sufficient for the removal of the foot crossing and the construction of the tie-in of the passenger access ramp. Further non-disruptive possessions are available on the Sunday night and mid-week nights if required.

Road and lane closures would be required to carry out the changes to the highway network.

### 13 Interface with other Projects

The following projects/works have been identified to date in the area of the level crossing site:

- Redoubling of Haughley Jn project. There will be an increase in the number of freight trains. It is expected to increase to 30+ each day per direction by 2030. The Ipswich to Peterborough service is also expected to double adding around 7-8 trains per day in each direction.
- Anglia 200 TWAO project. There may be an opportunity to add this crossing to this project if a TWAO is required.

### 14 Impact on Stakeholders

The impact to stakeholders from the feasible options assessed within this report is outlined below. Closure and construction of pedestrian ramp, layby, change to public road and footpath layout. Resulting risk scores: ALCRM: M13, FWI: 0

#### Impact to users of the public highway

There would be an improved to pedestrians who use the footpath under the railway bridge, due to the footpath being widened.

The fitment of the traffic lights to the railway bridge will allow for a safer way of crossing the road, than the current where it is not possible to see approaching vehicles from certain positions.

Road users of the railway bridge will benefit from the reduced likelihood of the bridge being struck by a road vehicle and causing the road to be blocked, causing delay.

The proposed option could increase journey times, and effort required for those currently using the crossing to access platforms.

#### Impact to users of the railway

There would be a change in the way the railway station of Thurston is accesses. Pedestrians will now not cross the railway; instead they will have to use the new up platform access.

Experience a more reliable railway due to the removal of a conflict point and reduction of number of assets, therefore removing failure points.

**GRIP**

*Governance for Railway Investment Projects*

Page 14 of 17

GCMS Ref:	65246864
Version:	2
Date:	25/08/2015

#### **Impact to local residents and businesses**

There will be a reduction in noise from the removal of the audible warning that the current MSL has.

#### **Impact to train operators**

There will be a change in the appearance of the railway, resulting in fewer distractions.

#### **Impact to Maintenance**

Removal of the level crossing and all its components will remove its need for maintenance.

#### **Impact to Infrastructure operators**

There is a reduction in point's failure. A simpler railway with less railway infrastructure.

### **15 Consents Strategy**

The required consents to date for the site are detailed below, including the strategy for how they will be obtained. A full consent strategy will be completed by liabilities.

Planning Consent may be required for land purchase for construction of new roads. This would be progressed in GRIP Stage 3 through Town Planning who will liaise with the Local Authority.

Network Change would be required for closure due to the removal of the level crossing. This shall be progressed early in GRIP Stage 3 in conjunction with the Network Change Co-ordinator.

Station change will be required; this shall be progressed in GRIP 3.

A Level Crossing Revocation would be required for all closure options and this shall be progressed throughout the project lifecycle in accordance with Office of Rail and Road (ORR) guidelines.

Where necessary, a Street Works Notice shall be submitted to the Highways Interface Clerk during GRIP Stage 3 to aid co-ordination with the local Highways Authority.

### **16 Environmental Appraisal**

An Environmental Appraisal has been completed. The following Environmental Implications and Risks have been identified at the site (where applicable to the options assessed):-

- There is thick undergrowth on the embankment between the up side and Beyton Road. Plants and wildlife unknown. Vegetation removal is required outside railway land.
- The area has a mix of residential housing and businesses.
- The railway is constructed on an embankment.
- The main car park (access to Down side) has no defined footpath and is used by local businesses.
- The proposed layby is to be constructed outside railway land on the up side.
- New pedestrian movements will be introduced via the proposed new road layout.

### **17. Engineering Outputs**

Engineering outputs would be aligned with the Project Characterisation Tool (PCT).

### **18 Contracting Strategy**

The anticipated Contracting Strategy for level crossing closure is for the recommended closure options to be categorised based on the outputs from GRIP 2 feasibility consultations. The categorisations will outline the most suitable strategy for successful closure. It is recommended for GRIP 3 a consultant is used with the necessary railway and stakeholder engagement experience; this

**GRIP**

**Governance for Railway Investment Projects**

Page 15 of 17

GCMS Ref:	65246864
Version:	2
Date:	25/08/2015

work will be awarded to a Framework Contractor or through competitive tendering led by the procurement team.

## 19 GRIP 2 Deliverables

The following deliverables have been produced during GRIP Stage 2 to inform the production of this Feasibility Report:-

- Environmental Appraisal & Action Plan
- Draft Diversity Impact Assessment
- Civils scheme sketch(s)

A Site Visit has been held with the Route Asset Management team and representatives from the Network Rail Operations, Maintenance and Risk teams.

Liabilities and Negotiations have also been consulted to gauge the potential for closure.

## 20 Conclusion and Recommendations

Closure of Thurston Station level crossing is recommended through means of constructing a new pedestrian ramp, from Platform 1 (Upside) down the embankment leading onto Beyton Road. The design is to include a drop off point / layby for vehicles along Beyton Road.

Due to the physical characteristics of the rail bridge in situ, a new road layout and traffic light system is recommended to accommodate both vehicle and pedestrian use.

A scheme sketch has been developed to prove the feasibility of constructing a suitable ramp and layby.

No other closure options were considered as feasible.

Considerations will need to be made for the local businesses and housing to maintain their access during construction and afterwards.

## 21 Client and Stakeholder Acceptance

This Feasibility Report shall be issued for consultation with the following key stakeholders:-

- Maintenance
- TOC (Abellio Greater Anglia)
- Highway Authority
- Operations
- Risk Specialist
- Route Enhancements
- Liability and Negotiations

A 14 working day consultation period shall be allowed to capture stakeholder comments on the proposed Single Option. A consultation meeting will be conducted on day 7, with 7 review days remaining.



CCMS Ref:	65246864
Version:	2
Date:	25/08/2015

A Stakeholder Document Feedback Form shall be issued with the Feasibility Report so that consultation comments are captured in a consistent format.

Stakeholder comments shall be collated on a Stakeholder Consultation Log and each comment shall be addressed to the satisfaction/agreement of the respective stakeholder. The resolution and closure of stakeholder comments shall also be recorded on the Stakeholder Consultation Log.

If the comments are believed to have resulted in a fundamental change, the document shall be updated and re-issued for a second consultation period of 5 working days. *This shall be by exception only.*

To view the consultation log, please see Appendix F, or click on the CCMS2 hyperlink in the reference table below.

## 22 References

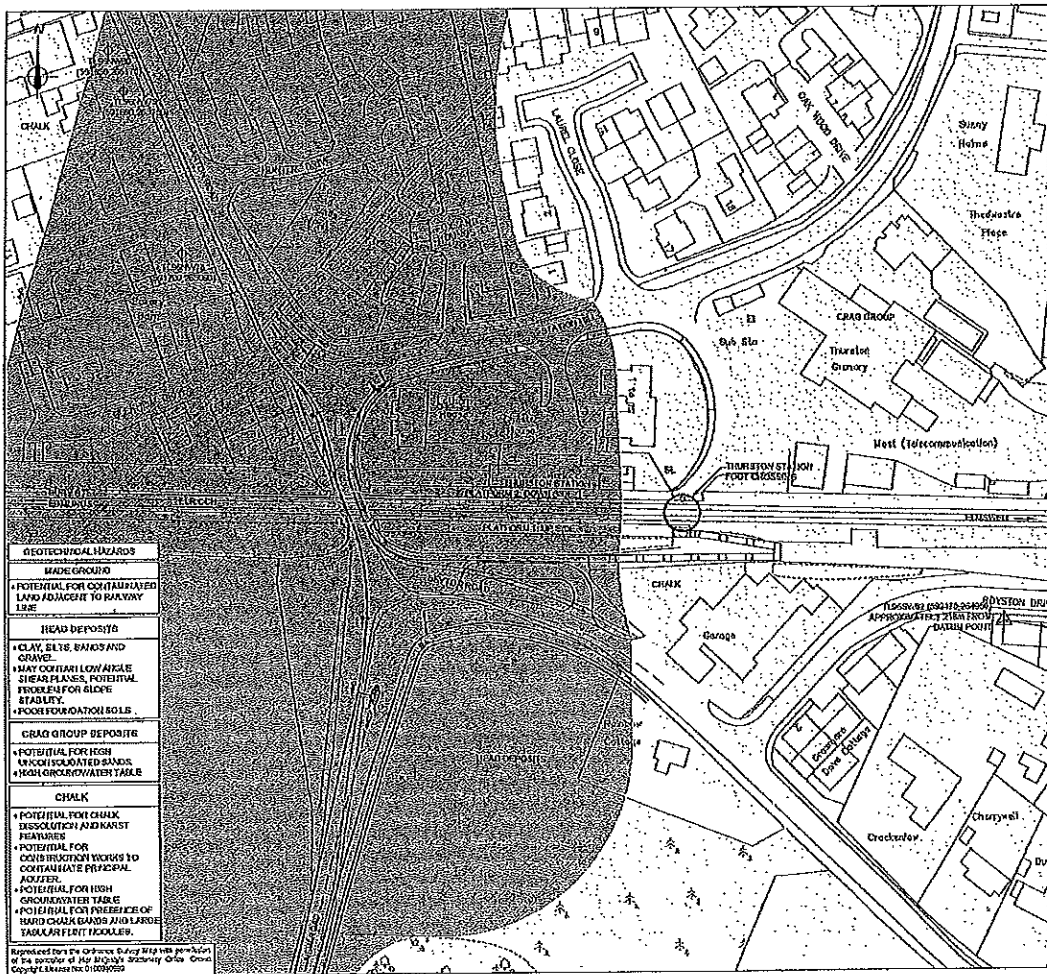
	Title	Version	Date	CCMS2 Link
1.	Draft Diversity Impact Assessment	1		<a href="#">65266986</a>
2.	Draft Environmental Appraisal	1		<a href="#">65330819</a>
3.	RRD	1		<a href="#">65233900</a>
4.	Stakeholder Consultation log	1		<a href="#">65323987</a>

## 23 Appendices

- A Geotechnical Features Map
- B Geotechnical Considerations
- C Option Drawing
- D Breakdown of Construction Cost Estimate
- E Design Risk Assessment
- F Consultation Log

## Appendix A: Geotechnical Features and Hazards Map

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**KEY:**

- ALIGNMENT OF UNDERLINE OR GAGE
- PROPOSED LAYOUT
- PROPOSED TRAFFIC FLOW
- SITE BOUNDARY
- DOGPOLE LOCATIONS
- △ DATA POINT, USED TO REFERENCE BOREHOLE LOCATIONS
- HEAD DEPOSITS
- CRAG GROUP
- CHALK
- SILVER CHALK FORMATION, LEE HAVEN CHALK FORMATION, SEAFORD CHALK FORMATION, LEEVES DOOKAN CHALK FORMATION (SEE REFERENTIAL)

**NOTES:**

1. DUE TO LACK OF REFERENCE POINTS, INFORMATION SHOWN OUTSIDE OF CG TILES IS QUALITATIVE ONLY.
2. UNCHANGED IS ENTERED AS A REFERENCE ONLY. MEASUREMENTS SHOULD NOT BE TAKEN FROM DRAWINGS TO BE READ IN CONJUNCTION WITH DRAWING NO. 144179-TS-TS-DRS-0002.

Rev	1	10/02/13	SD	A	11
For	Date	Issued by Ref Area	Drawn	Checked	Appr

FOR INFORMATION

**NetworkRail**

**ATHJV**  
ATA 211179-10-10-10-10-10

144179  
ANGLIA ROUTE LEVEL CROSSING  
CLOSURES FEASIBILITY STUDIES  
PACKAGE 6 - WOODBRIDGE CROSSINGS

THURSTON STATION LEVEL CROSSING  
GEOLOGICAL FEATURES AND HAZARDS

Drawn by	CARENNE GRIFFIN	Scale	1:1	Rev	30/09/13
Checked by	CARENNE GRIFFIN	Scale	1:1	Rev	30/09/13
Drawn by	JANNEE HUGHES	Scale	1:1	Rev	30/09/13
Drawn by	VAESSA REITHS HUGHES	Scale	1:1	Rev	30/09/13

1:1000 @ A3

EUR: CH, 324, 64CH

144179-TS-TS-DRS-0002

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Prepared for the Office of the Surveyor of the Secretary of State for Transport  
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## Appendix B: Geotechnical Considerations

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## 1. Introduction

The following section comprises a desk study which reviews the geotechnical and ground conditions for the proposed works at Thurston Station, Suffolk. The information informing the desk study was collected from the British Geological Survey (BGS) website, the Environment Agency (EA) website and from publically available aerial photographs. The available information was reviewed and the potential geotechnical hazards are discussed in the main report. Recommendations for further ground investigations are presented.

## 2. Site Geology

The geological map (BGS, 1982) and BGS's "Geoindex" website (<http://mapapps2.bgs.ac.uk/>) indicates the site is underlain by a series of Head deposits which overlie the Chalk bedrock. Approximately 100m to the east and west of the site, deposits of the Crag Group outcrop.

The BGS Lexicon of Named Rock Units describes the deposits as:

Head deposits consists of clay, silt, sand and gravel, which were formed up to 3 million years ago in the Quaternary Period. The local environment was previously dominated by subaerial slopes. Head deposits are typically described as polymict which comprises gravel, sand and clay depending on upslope source and distance from source. They are generally poorly sorted and poorly stratified deposits formed mostly by solifluction and/or hill wash and soil creep. They essentially comprise sand and gravel, with locally occurring lenses of silt, clay or peat and organic material.

The Crag Group consists typically of Sand and Gravel, which was formed about 5 million years ago in the Quaternary and Neogene Periods. The sands are characteristically dark green from glauconite but weather bright orange with hematite 'iron pans'. The gravels in the lower part of the group are almost entirely composed of flint, with a basal layer of glauconitic conglomerate of rounded flints. The Crag Group tends to form a sharp, planar unconformity with deposits from the White Chalk Subgroup in this area.

The Chalk consists of undifferentiated deposits of the Lewes Nodular Chalk Formation, Seaford Chalk Formation, Newhaven Chalk Formation and the Culver Chalk Formation all from the White Chalk Subgroup or in former terminology the Upper Chalk. The Lewes Nodular Chalk Formation being the oldest chalk strata. The chalk was formed approximately 71 to 94 million years ago in the Cretaceous Period. The Lewes Nodular Chalk Formation is composed of hard to very hard nodular chalks and hardgrounds with interbedded soft to medium hard chalks and marls. The Seaford Chalk Formation is a firm white chalk with semi-continuous nodular and tabular flint seams with occurrences of hardgrounds and thin marls in the lowest beds. The Newhaven Chalk Formation is composed of soft to medium hard, smooth white chalks with numerous marl seams and flint bands, including distinct phosphatic chalks of limited lateral extent. The Culver Chalk Formation is described as a soft white chalk, relatively marl free, with flint seams. The flints are generally large and, in the upper part, tabular. The sequence is typically between 65 to 75m thick and forms the bedrock geology in the area.

Borehole scans available on the BGS Geoindex website identified a number of borehole well records in the vicinity of the proposed works. Unfortunately, all records give very limited information on the nature of the head deposits, the Crag Group and the Chalk. The ground conditions described on the well logs are summarised in Table 4 below. The locations of the borehole records are shown on Drawing No 144179-THJ-TS-DRG-0021.

Table 4: Summary of ground conditions reported in BGS well log near Thurston Station level crossing

Well log Identification No.	Distance and direction from level crossing	Description of geology	Thickness (m)	Depth to base of the unit (m bgl)
TL96NW98	100m northwest	No superficial deposits or made ground deposits described. Bedrock geology is described as Upper Chalk, now referred to	40.23	40.23

		as the White Chalk Subgroup.		
TL96NW79	180m northwest	No superficial deposits or made ground deposits described. Bedrock geology is described as Upper Chalk, now referred to as the White Chalk Subgroup.	13.72+	13.72+
TL96NW80	200m northwest	No superficial deposits or made ground deposits described. Bedrock geology is described as Upper Chalk, now referred to as the White Chalk Subgroup.	21.34	21.34
TL96SW62	440m east	Sand and Gravel (possibly deposits of the Crag Group). Upper Chalk, now referred to as the White Chalk Subgroup.	Combined thickness of 21.34m	21.34
		Upper Chalk, now referred to as the White Chalk Subgroup.	15.84	37.18

### 3. Structural Geology and Mining

The geological map (BGS, 1982) indicates that the regional dip of the strata is to the south-east, dipping at a low angle. There is typically no structural distortion or faulting in this area.

According to the BGS Geindex website, there is no evidence of mining or quarrying in the vicinity of the site.

### 4. Hydrogeology and Hydrology

The BGS hydrogeology viewer classifies the White Chalk subgroup as a highly productive aquifer and the Crag Group as a moderately productive aquifer. The White Chalk subgroup deposits are up to 450m thick and can yield 50 to 100litres/second from large diameter boreholes and up to 300 litres/second from adited systems. The water quality is good, hard to very hard. The Crag Group deposits consist of fine grained, unconsolidated sands and silts up to 80m thick and can yield up to 40 litres/second. The water quality is hard and ferruginous.

According to the Environment Agency's What's in your backyard? Website Groundwater webpage, the site is located within a Groundwater Source Protection Zone (Total Catchment Zone 3) and a Groundwater Vulnerability Zone, being located on the junction between a Major Aquifer High zone and a Minor Aquifer High zone. The whole area is designated as a Principal aquifer.

According to the Environment Agency's 'risk of flooding from surface water' webpage, the site is at low to medium risk from surface water flooding. Low risk means that each year, this area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%). Medium risk means that each year, this area has a chance of flooding of between 1 in 100 (1%) and 1 in 30 (3.3%).

The River Black Bourn occurs approximately 3.4km to the east although a land drain occurs on the eastern outskirts of Thurston village approximately 1km from the site.

There is likely to be the potential for groundwater to be present at shallow depths, particularly within any Made Ground or superficial deposits. Groundwater within the Crag Group and chalk deposits is

likely to be affected by local abstraction rates. According to the Environment Agency, water is currently being abstracted approximately 500m to the south of the site at Thurston House, where the size of abstraction is recorded as 'large'. Groundwater records from the borehole well logs indicate depths between 7.6m (TL96NW80) and 21.5m (TL96SW62) pre-1969. Any proposed ground investigation should target verifying current groundwater levels.

## **5. Geotechnical Risk Register**

The geotechnical hazards identified in Section 5.2 and other ground and environmental hazards associated with the proposed development are summarised in a geotechnical risk register presented in Table 5. All costs associated with these risks are approximate and are subject to change.

## **6. Recommendations for Ground Investigation**

A ground investigation is recommended to verify the composition of the railway embankment and its structural properties and to determine the ground conditions for piled foundations for the access ramps. The ground investigation should comprise a series of cable percussive and or rotary core boreholes with sampling and laboratory testing. The investigation needs to fulfil the requirements of Eurocode 7.

The borehole investigation should be undertaken to identify the quality and engineering properties of the Chalk, which would likely be the founding stratum for the piled access ramps. The boreholes should be advanced by cable percussive and or rotary core drilling depending on the hardness of the Chalk. To achieve the requirements of Eurocode 7 for the design of structures, the termination depth of boreholes shall therefore be greater than 6m below the base of the footing or 3 times the footing width of the structure and include between 2 and 6 investigation points per foundation. Aquifer protection measures would be required in the Crag Group and Chalk deposits.

Further investigations should be targeted on the railway embankment to assess the structural properties, soil-structure interaction and stability to assess the suitability its use for the access ramp.

The boreholes should be installed with slotted standpipe piezometers or vibrating wire piezometers to allow monitoring (i.e. levelling, sampling and testing) of groundwater levels.

Geo-environmental testing for contamination should be undertaken in the surface deposits particularly in the immediate environs of the rail tracks.

## **7. References**

British Geological Survey. 1982. Bury St. Edmunds. England and Wales Sheet 189. Solid and Drift Geology. 1: 50 000. British Geological Survey. Keyworth, Nottingham.

British Geological Survey. No date. Borehole scans (online). Available from <http://scans.bgs.ac.uk/>. TL96NW78, TL96NW79, TL96NW80 and TL96SW62. Accessed 17 June 2015.

British Geological Survey. Geindex viewer (<https://mappapps2.bgs.ac.uk/>)

CIRIA. 2002. Engineering in Chalk. CIRIA Report C574, CIRIA, London.

Environment Agency website: What's in your backyard? (<http://www.environmentagency.gov.uk/homeandleisure/37793.aspx>)

Table 5  
Thurston Station  
Quantified Geotechnical Risk Register

Risk Ref	Cause (known control weakness or assumption "as a result of")	Event (future/uncertain "may be possibility of that")	Consequence (to objectives "which would lead to")	Min (£k)	Max (£k)	Likely (£k)	Likelihood	Mean outcome (£k)
001	Unknown nature and extent of Made Ground and Head deposits, associated with railway network and surrounding land use	Bearing failure, contaminated soils.	Implement ground improvement measures. Treat or remove contaminated soils.	0	50	10	10%	1
002	Presence of contaminated ground in the vicinity of the railway network and site	Hazardous to workers. High removal costs.	Treat or remove contaminated ground if required.	0	50	20	25%	5
003	Aggressivity of soils and groundwater to concrete	Chemical attack of buried concrete.	Design concrete to resist chemical attack. Additional protective measures may be required.	0	20	5	10%	0.5
004	Unknown nature and extent of Crag Group deposits (sands and gravels)	Bearing failure, instability	Implement ground improvement measures.	0	50	10	10%	1
005	Excavating in sand and gravel soils, with high groundwater tables	Instability, collapse of excavations	Dewater and shore excavations.	0	100	20	50%	10
006	Unknown extent of Chalk weathering	Bearing failure, total or differential settlement.	Excavate and replace material. Pile or improve the ground beneath any structures.	0	100	50	50%	25



**Table 5**  
**Thursfont Station**  
**Quantified Geotechnical Risk Register**

Risk Ref	Cause (known control weakness or assumption "as a result of")	Event (future/uncertain "may be possibility of that")	Consequence (to objectives "which would lead to")	Min (£k)	Max (£k)	Likely (£k)	Likelihood	Mean outcome (£k)
007	Karst landscape, dissolution or manmade features	Voids located close to the surface which could migrate and undermine any structures.	Pile below voids. Grout voids.	0	100	50	25%	12.5
008	Drilling in Chalk (during ground investigation)	Pollution and contamination of the Principal Aquifer.	Aquifer protection measures to be implemented during drilling.	0	100	10	80%	0.8
009	Presence of flints and hard bands in the Chalk	Obstruction to piling, excavation and drilling	Use rotary coring methods. Ensure pile driveability with larger pile section.	0	100	50	50%	10
010	Frost susceptibility of exposed chalk faces	Heave and settlement of supported structures and pavements.	Ensure road construction is thick enough to prevent frost action and cover any exposed chalk faces.	0	100	50	50%	10
011	Unknown buried and overhead services	Risk of striking services, major costs and fatalities.	Divert or protect services.	0	1000	200	5%	10
012	Unexploded Ordnance. The site lies within a "No Risk" area as defined by Zetica ( <a href="http://zeticauxo.com/">http://zeticauxo.com/</a> )	Risk of explosion and fatalities.	Research local records and talk to local residents. Toolbox talks.	0	300	50	5%	2.5

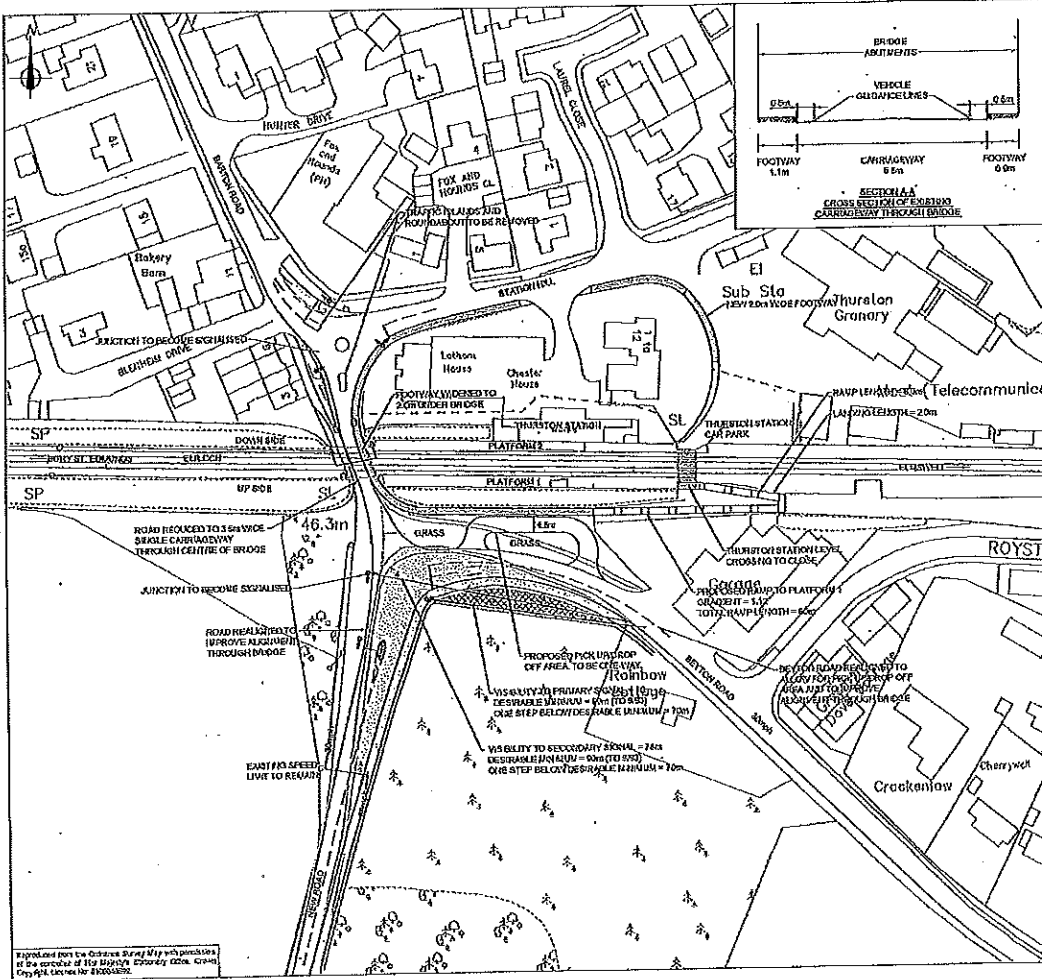
**Table 5**  
**Thurston Station**  
**Quantified Geotechnical Risk Register**

Risk Ref	Cause (known control weakness or assumption "as a result of")	Event (future/uncertain "may be possibility of that")	Consequence (to objectives "which would lead to")	Min (£k)	Max (£k)	Likely (£k)	Likelihood	Mean outcome (£k)
013	Unknown depth to groundwater table.	Risk of flooding of excavations.	Excavations may require dewatering.	0	50	20	10%	2
014	Presence of buried archaeological deposits and listed buildings	Risk of damage and destruction of important archaeological features and listed buildings. Delays to programme.	Toolbox talks and/or archaeological investigations along proposed routes.	0	50*	10	10%	1

\* Delays to programme not costed.  
 All costs are approximate.

## Appendix C: Option Drawings

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**KEY:**

- OR PLAN
- ALIGNMENT OF UNDERLIE BRIDGE
- PROPOSED LAYOUT
- EXISTING LEVEL CROSSING TO CLOSE
- PROPOSED FOOTWAY WIDENING
- PROPOSED TACTILE PAVING
- PROPOSED LINES (LINE = 184mm dia)
- PROPOSED TRAFFIC SIGNALS
- NETWORK RAIL BOUNDARY
- VISIBILITY FLARE
- LAND TO BE MAINTAINED FOR REQUIRED SIGHTING (EYES TO SIGNALS 210m eyes)

**NOTES:**

- THIS DRAWING SHOWS AN INDICATIVE LAYOUT AND IS BASED ON OS MAPS AND A SRE VISIT ONLY. A TOPOGRAPHICAL SURVEY WILL BE REQUIRED PRIOR TO ANY FURTHER DESIGN WORK.
- DO NOT SCALE
- DURIED SERVICES INFORMATION WAS NOT AVAILABLE AT TIME OF DRAWING. DURIED SERVICES INFORMATION MAY BE OBTAINED FROM THE DESIGN TO BE OBTAINED BY CONSULTATION WITH DRAWING NO. 144178-TH-1S-CR0-0020.

144178-TH-1S-CR0-0020	CR0-0020	CR	W	11
Rev	Desc	Drawn	Check	Appr

FOR INFORMATION

ATH JV  
ATA Rail Projects - Network Rail Partner

**144178 ANGLIA ROUTE  
LEVEL CROSSINGS CLOSURE  
FEASIBILITY STUDIES  
PACKAGE 5 - WOODBRIDGE LEVEL CROSSINGS**

**THURSTON STATION LEVEL CROSSING  
CLOSURE AND PEDESTRIAN DIVERSION**

DATE	BY	CHKD	APPD
01/03/2011	...	...	...
02/03/2011	...	...	...
03/03/2011	...	...	...
04/03/2011	...	...	...

Scale: 1:1000 @ A3

Sheet: ELR-CCH, 524, 54CH

1 OF 1

144178-TH-1S-CR0-0020

01

Information from the Ordnance Survey Map is reproduced at the courtesy of the Ordnance Survey. Crown Copyright. Licence No. 100048296.

Appendix D: Breakdown of Construction Costs Estimate

### Thurston Station Level Crossing Closure Estimated Costs

#### Estimated Construction Costs

Item description	Level Crossing closure and new pedestrian route via existing bridge and new passenger access ramp
Site Clearance	20,000
Groundworks	40,000
Road widening	170,000
Drop-off point	22,000
Footway	16,000
Access ramp	25,000
Traffic signals	40,000
<b>Sub total</b>	<b>333,000</b>
Construction preliminaries (10%)	33,300
Optimism bias (44%)	161,172
Contractors overheads and profit (10%)	52,747
<b>Total Construction costs at 2011 rates</b>	<b>580,219</b>
<b>Total Construction costs at 2014 rates</b>	<b>660,000</b>

#### Estimated Project Costs

Land purchase	3,600
Services protection or diversion	50,000
Level Crossing Closure -Design and Construction	20,000
<b>sub total</b>	<b>73,600</b>
Network Rail PM costs (10%)	70,000
Design Development -GRIP3-4	60,000
Ground investigation and topographical survey	35,000
Design Development -GRIP5-8	30,000
Construction supervision	10,000
<b>Total scheme costs (£)</b>	<b>938,600</b>
Rounded up to nearest £100k	1,000,000

## Appendix E: Design Risk Assessment

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## Appendix F: Consultation Log

**Level Crossing Development Team  
Document Review Feedback Form and Consultation Workshop notes**

Document Details	
Project Name:	Anglia Closure Feasibility Studies -- Package 5
Business Plan or OP Reference:	144179
Level Crossing Names:	Thurston Station, Jetty Avenue, Kingston Farm, Dock Lane, Bloss, Maltings, Melton Sewage, Melton Station and Ellingers
Document Title:	Feasibility report
Date:	26 <sup>th</sup> August 2015
Document Version:	1.0
Stakeholder Document Feedback Form Return Details (LCDT Representative)	
Name:	Rachel Jones
Title/Position:	Project Development Assistant
Telephone Number:	07710 958369
Email Address:	Rachel.jones@networkrail.co.uk
Reviewers	Sean Cronin, Georgina Aruxandel, Steve Day, Mike Essex, Thomas Shannon, Kenneth Gray, Adrian Webb, Daniel Fisk, Michael Jacques, Mike Lewis Rachel Jones, Andy Kenning, George Onaya and Hugo Nobrega

## Level Crossing Development Team Document Review Feedback Form and Consultation Workshop notes

No.	Page	Section	Feasibility report name / LC	Stakeholder Comment	Comment Cat. (see below)	Initials
1	4	1	Thurston Station	Reference to highway is inappropriate in this case. Consider rewording in terms of removing any interface where a person or vehicle could be struck by a train.	1	SD
2	4	1	Thurston Station	Reference to the Haughley end is unclear, as there is no Haughley station. Suggest Elmswell end, which is more easily discernible.	1	SD
3	4	1	Thurston Station	The level crossing provides access from the down side, where the station entrance is to the up platform and acts as the only means of accessing the up platform.	1	SD

## Level Crossing Development Team Document Review Feedback Form and Consultation Workshop notes

4	N/A		Thurston Station	Looking at feasibility of carriageway singling under the bridge, I would like to see the following data: <ul style="list-style-type: none"> <li>• Current width of road under bridge</li> <li>• Wide enough for 2 vehicles to pass? And if so, what if one's a tall vehicle?</li> <li>• History of accidents under the bridge (from Suffolk Road Safety)</li> <li>• Census of usage with road vehicles and pedestrians. Essential element in convincing Suffolk.</li> </ul>	3	SD
5	N/A		Thurston Station	Are all the main 'attractions', and most housing, north of the railway line in Thurston? Please confirm.	1	SD
6	N/A		Thurston Station	Overall, a very good proposal that just needs a little fleshing out.	1	SD
7	N/A		Thurston Station	NR has some former land in the area. I shall order the Deeds and keep them on file.	1	SD
8	Note from workshop 14/08/2015	N/A	Thurston Station	Car park is not on NR land	1	SD
9	Note from workshop 14/08/2015	N/A	Thurston Station	Possible need to add a stepped link on the ramps to make a shorter route for able bodied users.	3	AK

## Level Crossing Development Team Document Review Feedback Form and Consultation Workshop notes

10	Note from workshop 14/08/2015	N/A	Thurston Station	Design is only 1:12 and likely to need to be 1:20	3	AK
11	Note from workshop 14/08/2015	N/A	Thurston Station	Possibility of adding a disabled parking space	2	AK
12	Note from workshop 14/08/2015	N/A	Thurston Station	A Station lift was considered and discounted as it would entail construction of access ramps due to the topography	1	GO
13	Note from workshop 14/08/2015	N/A	Thurston Station	TWAO required for highway alterations and verge changes.	1	AK
14	Note from workshop 14/08/2015		Jetty Avenue and Kingston Farm	Height restriction at the station due to footbridge.	1	AK
15	Note from workshop 14/08/2015		Jetty Avenue and Kingston Farm	Turning circle at ferry needs to be analysed with vehicle sweeping	3	AK
16	Note from workshop 14/08/2015	N/A	Jetty Avenue and Kingston Farm	Potential bespoke bridge design to lessen impact. If stakeholders agree to the principle of overhead structure, detailed design to be undertaken in consultation with the stakeholders to achieve a structure sympathetic to the local environment	3	GO
17	Note from workshop 14/08/2015	N/A	Jetty Avenue and Kingston Farm	Impact resistant bollards to be provided on the link road railway side	2	GO

# Level Crossing Development Team (LCDT) Stakeholder Consultation Form

Project Details	
Project Name:	Anglia Closure Feasibility Studies -- Package 5
Business Plan or OP Reference:	144179
Level Crossing(s):	Thurston Station, Jetty Avenue, Kingston Farm, Dock Lane, Bloss, Mallings, Melton Sewage, Melton Station and Ellingers
Consultation Type:	Feasibility workshop
Consultation Date:	14 <sup>th</sup> August 2015
Document Version:	1.0
LCDT Representative Details	
Name:	Rachel Jones
Title/Position:	Project Development Assistant
Telephone Number:	07710 958369
Email Address:	Rachel.jones@networkrail.co.uk

No.	Name	Title	Sign
1.	Rachel Jones	PDA-LCDT	
2.	George Onaya	SPDM- LCDT	
3.	Hugo Nobrega	PDA - LCDT	
4.	MIKE LEWIS	LCM	
5.	MIKE JACOBS	LCM	
6.	Daniel Fox	RCCM	
7.	ANDY KENNING	LX ENG LCDT	
8.	STEVE DAY	LIABILITY NEGOTIATIONS ADV	

# Level Crossing Development Team (LCDT) Stakeholder Consultation Form

9.	TS Shannen	Operations Manager	
10.	GEORGINA ARUKANDEI	SPONSOR	
11.	I SAHL ADJIF	COMMERCIAL MANAGER	
12.	KEN GRAY	SENIOR ASSET ENG (SIGNALS)	
13.			
14.			
15.			
16.			

No.	Consultation Type	Comments	Status

Our Ref: 570/CON/5070/16  
Date: 8<sup>th</sup> June 2017  
Enquiries to: Steve Merry  
Tel: 01473 341497  
Email: steven.merry@suffolk.gov.uk



**All planning enquiries should be sent to the Local Planning Authority.**  
Email: [planningadmin@babberghmidsuffolk.gov.uk](mailto:planningadmin@babberghmidsuffolk.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/5070/16**

**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 or access) for Land at Norton Road, Thurston

**LOCATION:** Norton Road, Thurston, Suffolk

**ROAD CLASS:** C

This letter is complimentary to those ref 570/CON/5070/16 dated 10<sup>th</sup> March 2017 and 6<sup>th</sup> April 2017 which detailed 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 from the public highway

1. Condition: No other part of the development shall be commenced until the new vehicular access has been laid out and completed in all respects in accordance with Drawing 618212/SK11 Rev A and has 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 accesses off Norton Road are first used visibility splays shall be provided as shown on Drawing 618212/SK02 Rev A with an X dimension of 2.4 metres and a Y dimension of 120 metres and thereafter retained in the specified form. 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 in order to take avoiding action.

3. 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.

4. 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.

5. 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 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.

**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

Comment: All matters are reserved except for access although this includes approximately 90m of the eastern Minor Access Road that is proposed to provide a link to the proposed site of the Primary School. On this occasion it has been accepted that a minimum road width of 5.5 metres and a MfS design for visibility for 30mph is acceptable. This is a relaxation of the Suffolk Design Guide for Estate Roads and allowed on the basis that the site is urban and that traffic calming measures will be provided.

6. Condition: Before the accesses off the eastern Minor Access Road are first used visibility splays shall be provided as shown on Drawing 618212/SK11 Rev A with an X dimension of 2.4 metres and a Y dimension of 45 metres and thereafter retained in the specified form. 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 in order to take avoiding action.

7. 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.

8. 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.

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.

9. 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.

### Public Transport

Comment: The nearest bus stop is approximately 500m from the site. It is proposed that additional bus stops and shelters are placed either side of Norton Road to the east of Rylands Close and this development provides a S106 contribution to do so.

### Street Lighting

Note: The existing street lighting system may be affected by this proposal.

The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 0345 606 6067, in order to agree any necessary alterations/additions to be carried out at the expense of the developer."

### Construction Management Plan

11. 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.

### Highway S106 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 £7111 on commencement of the 100<sup>th</sup> dwelling.
2. Improvements to PRow 007 (un metalled) north of Meadow Lane. A contribution of £16500 in commencement of the 100<sup>th</sup> dwelling.

3. Contribution towards extension of speed limit on Norton Road. A contribution of £4267 on commencement of any construction work on site.
4. Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction. A contribution of £21838 on occupation of the first dwelling.
5. Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £68924 on commencement of any construction works on site.
6. Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road. A contribution of £12624 on commencement of the first dwelling.

Except for the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton the reasons for requesting these contributions are described above. The A143 improvements are mitigation to improve capacity at this junction reflecting the small individual but, in terms of cumulative impact, significant effect that the five developments will have at this junction.

These contributions and the costs attributed to each of the five development sites assume a collaborative approach as outlined in our letter of the 10<sup>th</sup> March 2017. If this site is determined as a stand-alone application, or planning permission considered only a number of these sites these conditions and contributions would need to be re-assessed.

#### Travel Plan and S106 Contributions

For a development of this size we would require a Residential Travel Plan to mitigate the highway impact of the proposed development. Based on the information that I have received from yourself we would require the following contributions:

7. Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum 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
8. Travel Plan Implementation Bond -- To be confirmed when a detailed application/Travel Plan is submitted. This will be used to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves

We would also require the following Section 106 obligations:

- Full Implementation of the Travel Plan and its monitoring
- Provision of an approved welcome pack to each dwelling after first occupation
- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

Yours sincerely



Steve Merry  
Transport Policy and Development Manger  
Resource Management