



Historic England

EAST OF ENGLAND OFFICE

Mr James Platt
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582738

Our ref: P00538167

21 November 2016

Dear Mr Platt

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

**LAND ON THE WEST SIDE OF BARTON ROAD, THURSTON, IP31 3NT
Application No 4386/16**

Thank you for your letter of 18 November 2016 notifying Historic England of the application for listed building consent/planning permission relating to the above site. On the basis of the information provided, **we do not consider that it is necessary for this application to be notified to Historic England** under the relevant statutory provisions, details of which are enclosed.

If you consider that this application does fall within one of the relevant categories, or if there are other reasons for seeking the advice of Historic England, we would be grateful if you could explain your request. Please do not hesitate to telephone me if you would like to discuss this application or the notification procedures in general.

We will retain the application for four weeks from the date of this letter. Thereafter we will dispose of the papers if we do not hear from you.

Yours sincerely

Clare Campbell
Principal Inspector of Historic Buildings and Areas
E-mail: clare.campbell@HistoricEngland.org.uk

Enclosure: List of applications requiring consultation with and notification to Historic England



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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



Historic England

EAST OF ENGLAND OFFICE

Planning and Listed Building Consent applications requiring consultation with and notification to Historic England (the Historic Buildings and Monuments Commission for England) April 2015

Applications for planning permission

Historic England must be consulted or notified (see note 1) of the following planning applications by virtue of the following provisions:

Consultation:

Development which in the opinion of the local planning authority falls within these categories:

- P1 Development of land involving the demolition, in whole or in part, or the material alteration of a listed building which is classified as Grade I or II*
- P2 Development likely to affect the site of a scheduled monument
- P3 Development likely to affect any battlefield or a Grade I or II* park or garden of special historic interest which is registered in accordance with section 8C of the Historic Buildings and Ancient Monuments Act 1953

Basis for this - Town and Country Planning (Development Management Procedure) (England) Order 2015 - article 18 and Schedule 4.

- P4 Development likely to affect certain strategically important views in London

Basis for this - Secretary of State for Communities and Local Government Directions relating to Protected Vistas 2012

Notification:

Development which the local authority (or Secretary of State) think would affect:

- P5 The setting of a Grade I or II* listed building; or
- P6 The character or appearance of a conservation area where
 - i) the development involves the erection of a new building or the extension of an existing building; and
 - ii) the area of land in respect of which the application is made is more than 1,000 square metres

Basis for this - Planning (Listed Buildings and Conservation Areas) Regulations 1990 - regulation 5A (as amended by The Planning (Listed Buildings and Conservation Areas) (Amendment) (England) Regulations 2015

- P7 Local authority/ies own applications for planning permission for relevant demolition in conservation areas. (see note 2)

Basis for this - Town and Country Planning General Regulations 1992 (as amended by the Town and Country Planning General (Amendment) (England) Regulations 2015

Note 1: There is a difference between Consultation and Notification. When LPAs consult on applications, there is a duty to provide a substantive response to the LPA within 21 days. A notification from the LPA is to enable representations to be made if we so wish, and to respond within 21 days. Historic England does not make a distinction in its handling of advice work.

Applications for listed building consent

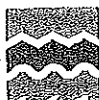


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Historic England

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Historic England must be notified of the following applications for listed building consent by virtue of the following provisions:

Notification:

- L1 For works in respect of any Grade I or II* listed building; and
- L2 For relevant works in respect of any grade II (unstarred) listed building

(relevant works means:

- i) works for the demolition of any principal building (see note 3);
- ii) works for the alteration of any principal building which comprise or include the demolition of a principal external wall of the principal building; or
- iii) works for the alteration of any principal building which comprises or includes the demolition of all or a substantial part of the interior of the principal building.

For the purposes of sub paragraphs ii) and iii) above:

- a) a proposal to retain less than 50% of the surface area of that part of a principal building represented on any elevation (ascertained by external measurement on a vertical plan, including the vertical plane of any roof) is treated as a proposal for the demolition of a principal external wall;
 - b) a proposal to demolish any principal internal element of the structure including any staircase, load bearing wall, floor structure or roof structure is treated as a proposal for the demolition of a substantial part of the interior.)
- L3 Decisions taken by the local planning authorities on these applications

Basis for this - Arrangements for handling heritage applications - Notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2015 - made under section 12, 15 (1) and (5) of the Planning (Listed Buildings and Conservation Areas) Act 1990

Historic England
15 April 2015

Note 2: Relevant demolition is defined in section 196D of the Town and Country Planning Act 1990 as "demolition of a building that is situated in a conservation area in England and is not a building to which section 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990 does not apply by virtue of s75 of that Act (listed buildings, certain ecclesiastical buildings, scheduled monuments and buildings described in a direction of the Secretary of State under that section.)

Note 3: "principal building" means a building shown on the list compiled under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and includes (unless the list entry indicates otherwise) any object or structure fixed to that building, but does not include any curtilage building.



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From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 21 November 2016 13:54
To: Planning Admin
Subject: 4386/16 Consultation response FAO James Platt

Dear James

Application ref: 4386/16
Our ref: 201789

Natural England has no comments to make on this application.

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

We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England.

Yours faithfully

Jacqui Salt
Natural England
Consultation Service
Hornbeam House
Crewe Business Park
Electra Way,
Crewe
Cheshire, CW1 6GJ

From: RM Floods Planning
Sent: 21 November 2016 14:26
To: Planning Admin
Cc: James Platt
Subject: 2016-11-21 JS reply Land on the west side of Barton Road, Thurston IP31 3NT 4386/16

Suffolk County Council, Flood & Water Management can make the following Initial comment

FRA has failed to highlight the historical flooding to properties Heather Close and Furze Close, as well as the predicted flood risk to properties adjacent to Barton Rd.

The use of infiltration as the primary method of disposal of surface water is welcomed.

This however is the only viable surface water drainage strategy for the proposed development and only four trial pits have been dug and tested for the site, which whilst gives an indication that infiltration is likely to work in some areas, isn't definitive at this stage. We would like to see a location plan of the trial pits and would welcome additional infiltration tests to be carried out.

As this is a full application a full detailed design of the surface water drainage system (including these components) is required to be submitted with the application.

Details of our requirements can be found on the [Suffolk CC local SuDs guidance](#).

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

From: Nathan Pittam
Sent: 22 November 2016 11:14
To: Planning Admin
Subject: 4386/16/FUL. EH - Land Contamination.

M3 : 186849

4386/16/FUL. EH - Land Contamination.

**Land on the west side of, Barton Road, Thurston, BURY ST EDMUNDS,
Suffolk.**

**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.**

Many thanks for your request for comments in relation to the above application. I have reviewed the report provided that was authored by the Nott Group (ref . 72427/R/001) dated 23rd November 2015 and am generally satisfied that the report provides sufficient information against which to make a recommendation. I can confirm that I have no objection to the proposed development from the perspective of land contamination. The report does however conclude with the recommendation that a Phase II report is completed prior to any development commencing. Given the balance of evidence provided in the report I feel that we could not require this by means of condition but the developer may wish to undertake these works as a precautionary measure.

Regards

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715
m: 07769 566988
e: Nathan.pittam@babberghmidsuffolk.gov.uk
w: www.babergh.gov.uk www.midsuffolk.gov.uk

Consultee Comments for application 4386/16

Application Summary

Application Number: 4386/16

Address: Land on the west side of Barton Road, Thurston IP31 3NT

Proposal: 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

Case Officer: James Platt

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 as there appears to be no public footpaths adjacent or through this site I do not have any comments or observations to make.

From: David Pizzey
Sent: 24 November 2016 12:00
To: James Platt
Cc: Planning Admin
Subject: 4386/16 Land on the west side of Barton Road, Thurston.

James

As this site is currently an arable field there are relatively few arboricultural issues relating to this proposal. However, a couple of matters that require addressing, namely –

- The necessity to remove the well-established hawthorn hedge to the site frontage. This would help soften and integrate any development within the local landscape and should be retained if at all possible. I presume removal is a highways visibility requirement?
- Plot 1 is likely to be significantly dominated by the important Beech tree T4 (located off-site) due to proximity, scale and orientation. It would be beneficial to re-design this area of layout in order to improve the relationship between the development and this important tree in order to help avoid future pressure for pruning and/or removal.

Notwithstanding these concerns I have no objections in principle to this application.

Happy to provide further comments if/when required.

David

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

Rights of Way and Access
Resource Management, Suffolk County **From:** RM PROW Planning
Sent: 30 November 2016 11:12
To: Planning Admin
Subject: RE: Consultation on Planning Application 4386/16

For The Attention Of: James Platt

Rights of Way Response

Thank you for your consultation regarding the above planning application.

Please accept this email as confirmation that we have no comments or observations to make in respect of this application affecting any public rights of way.

Please note, there may also be public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

This response 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, we would be seeking a contribution for improvements to the network. These requirements will be submitted with Highways Development Management response in due course.

Regards

Jackie Gillis
Rights of Way Support Officer
Countryside Access Development Team
Council
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

✉ PROWPlanning@suffolk.gov.uk | 🌐 <http://publicrightsofway.onesuffolk.net/> | **Report A Public Right of Way Problem Here**

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

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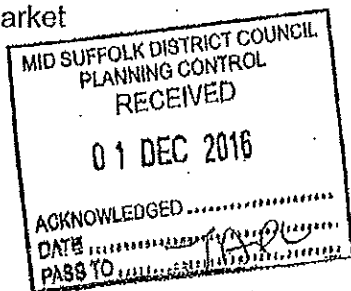
Suffolk Fire and Rescue Service

Mid Suffolk District Council.
Planning Department
131 High Street
Needham Market
Ipswich
IP6 8DL

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Your Ref:
Our Ref: FS/F305633
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 29/11/2016



Dear Sirs

Land on the west side of Barton Road, Thurston, IP31 3NT
Planning Application No: 4386/16+S106

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

Access and Fire Fighting Facilities

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2006 Edition, incorporating 2010 and 2013 amendments Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2006 Edition, incorporating 2010 and 2013 amendments.

Water Supplies

Suffolk Fire and Rescue Service recommends that fire hydrants be installed within this development on a suitable route for laying hose, i.e. avoiding obstructions. However, it is not possible at this time to determine the number of fire hydrants required for fire fighting purposes. The requirement will be determined at the water planning stage when site plans have been submitted by the water companies.

Continued/

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Suffolk Fire and Rescue Service recommends that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully



Mrs A Kempen
Water Officer

Enc: PDL1

Copy: Mr L Short, Artisan PPS Ltd, Berwick House, Baylham, Ipswich IP6 8RF
Enc: Sprinkler information



OFFICIAL

Suffolk Fire and Rescue Service

Fire Business Support Team
Floor 3, Block 2
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

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

Your Ref:
Our Ref: ENG/AK
Enquires to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 29 November 2016

Planning Ref: 4386/16+S106

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land on the west side of Barton road, Thurston IP31 3NT
DESCRIPTION: 138 dwellings
NO: HYDRANTS POSSIBLY REQUIRED: Required

If the Planning Authority is minded to grant approval, the Fire Authority will request that adequate provision is made for fire hydrants, by the imposition of a suitable planning condition at the planning application stage.

If the Fire Authority is not consulted at the planning stage, the Fire Authority will request that fire hydrants be installed retrospectively on major developments if it can be proven that the Fire Authority was not consulted at the initial stage of planning.

The planning condition will carry a life term for the said development and the initiating agent/developer applying for planning approval and must be transferred to new ownership through land transfer or sale should this take place.

Fire hydrant provision will be agreed upon when the water authorities submit water plans to the Water Officer for Suffolk Fire and Rescue Service.

Where a planning condition has been imposed, the provision of fire hydrants will be fully funded by the developer and invoiced accordingly by Suffolk County Council.

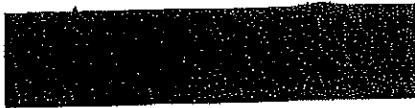
Until Suffolk Fire and Rescue Service receive confirmation from the water authority that the installation of the fire hydrant has taken place, the planning condition will not be discharged.

Continued/

OFFICIAL

Should you require any further information or assistance I will be pleased to help.

Yours faithfully



Mrs A Kempen
Water Officer

OFFICIAL

From: Iain Farquharson
Sent: 05 December 2016 14:16
To: Planning Admin
Subject: 183846. Consultation on Planning Application 4386/16

Our Ref 186846

Dear Sir/Madam

We have reviewed the documentation in relation to sustainability and consider there to be little or no information upon which to make a recommendation. The design and access document submitted does have a sustainability section (5.3) but there are few firm commitments to sustainability levels or standards. As this is a full application information regarding proposed construction standards, maximum water consumption, responsible and or local sourcing, 3rd party accreditation, renewable technology etc is expected.

The applicant is requested to supply such information to enable a recommendation. Until such time the recommendation is refusal.

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

☎ 01449 724878

✉ iain.farquharson@baberghmidsuffolk.gov.uk

From: planningadmin@midsuffolk.gov.uk

From: Judson, Charles [mailto:Charles.Judson@westsuffolk.gov.uk]

Sent: 05 December 2016 09:37

To: Planning Admin

Subject: Planning Application 4386 / 16 - Land on the west side of Barton Road, Thurston, IP31 3NT

Dear Mr Isbell

I write with reference to your letter dated 18th November 2016 consulting St Edmundsbury Borough Council on the above mentioned planning application.

St Edmundsbury Borough Council as Local Planning Authority has no comment to make in respect of the application.

Kind regards

Charles



Consultation Response Pro forma

1	Application Number	4386/16 Land on the west side of Barton Road, Thurston, IP31 3NT
2	Date of Response	06/12/2016
3	Responding Officer	Name: Rebecca Styles
		Job Title: Heritage Officer
		Responding on behalf of... Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • No harm to adjacent designated heritage assets because the proposed scheme, although will develop land which is presently open, will be read in the context of an extension to existing residential development and thus will not erode the rural character of the listed farmsteads in the setting of the application site
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>This proposal seeks planning permission for the erection of 138 dwellings to the north of existing residential development on the west of Thurston, north of the train line. The application site includes the final part of the undeveloped former Thurston Heath, and is presently agricultural land. To the north of the application site are open fields, with Barton Road bounded by native hedging, whilst the area to the south of the application site is modern housing estates comprising some hundreds of houses.</p> <p>This development has the potential to impact Grade II listed Mill Farmhouse and Grange Farmhouse to the north of the application site.</p> <p>It is the view of the Heritage team that this proposal will not harm the setting of these heritage assets.</p> <p>Mill Farmhouse is located to the NE of the application site, on the opposite side of the highway, and is set back from Barton Road by over 100m down a farm track, fronted by Mill Farm Cottage, an attractive C18-C19th unlisted dwelling which is a further 100m to the north of the application site.</p> <p>Grange Farmhouse is located closer towards the Barton Road highway, but is also located some 200m to the north of the application site.</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>The proposed scheme, although will develop land which is presently open, will be read in the context of an extension to existing residential development and thus will not erode the rural character of the listed farmsteads in the setting of the application site. Although there will be an impact on the setting of the heritage assets, the listed buildings identified are of such distance from the application site and, when viewed in the context of existing development, it is not considered that this impact will be a harmful one with regard to the setting of the listed buildings.</p> <p>No objection.</p>
6	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	
7	Recommended conditions	

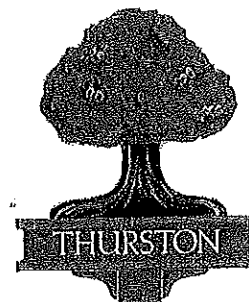
Please note that this form can be submitted electronically on the Council's website. Comments submitted on the website will not be acknowledged but you can check whether they have been received by reviewing comments on the website under the application reference number. Please note that the completed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

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

Tel: 01359 232854

e-mail: info@thurstonparishcouncil.gov.uk



SENT AS AN E-MAIL

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

December 9th 2016

Dear Mr. Isbell,

Proposal: Planning Application 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 at land on the west side of Barton Road, Thurston. IP31 3NT

Application Number: 4386/16

The Parish Council wishes to place on record that it objects to the plans as submitted under planning application 4386/16 for the following reasons:

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

The Parish Council however has not only looked at current policy, but has also taken on board views of the members of the public who attended the Planning Committee Meeting held to discuss this application as well as those of the Neighbourhood Plan Team who are in the process of undertaking a Neighbourhood Plan for Thurston. The Neighbourhood Plan Team reports to the Parish Council on a regular basis and all Parish Councillors are fully aware and in agreement with the views of the Neighbourhood Plan Team, some of whom are indeed both Parish Councillors and Neighbourhood Plan members. The Parish Council has received correspondence from the Neighbourhood Plan Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that

they are to be included within its submission. As such a copy of that letter should be read in conjunction with this response.

Reasons for objection:

1. The site and surrounding area are within the countryside and therefore outside of any settlement boundary for Thurston as defined by Mid Suffolk's Local Plan and would result in the development of new dwellings that would be visually, physically and functionally isolated from the facilities and services offered by Thurston as a Key Service Centre.

It is also felt that the proposal is considered to be an overdevelopment of the site and fails to address the wishes of the views of the residents of Thurston (as expressed in the emerging Thurston Neighbourhood Plan) for all new development to be sited on areas containing no more than 50 dwellings and as such will not incorporate the creation of sufficient open spaces between existing and proposed buildings which will neither maintain nor enhance the character of the village at this particular point. (GP1 – Design and Layout of Development & csfr-fc2 provision and distribution of housing).

The Parish Council is of the view that the siting of 2 storey dwellings along the western and southern development is not a feature of the area immediately adjacent to the site and that the appearance of such dwellings will be an intrusion and will fail to complement the character of the existing area. As there is a slightly higher proportion of 1 storey dwellings within these locations the proposed development, which shows only 9 single storey dwellings out of the 138 proposed, the proposal fails to take into account the surrounding area and is to be considered to be contrary to Policy H13 in that it fails to follow a design and layout which should respect the character of the proposed site and the relationship of the proposed development to its surroundings.

The Parish Council feels that the preferred option would be to have single story dwellings around the perimeter of the site which would be in-keeping with the existing properties. Furthermore there should be substantial soft landscaped buffer strips to maintain existing levels of privacy and tranquillity.

There appears to have been little consideration with regards to the residents of the existing adjacent properties. The proposed development has houses built on the very edge of the boundaries and, by virtue of its scale and density is inappropriate to the site and its surroundings and as such will have a detrimental impact on the privacy, tranquillity and outlook of the existing properties which is not in accordance with Policies H13 of the Mid Suffolk Local Plan in that it fails to take into account the amenities of neighbouring residents which should not be unduly affected by reason of overlooking or loss of daylight.

2. The proposal is considered not to form a sustainable development within the dimensions set out in the NPPF and that the proposed application risks harm to biodiversity and fails to address adequately the benefits on an economic and social benefit.

The Parish Council does not hold with the views expressed in the documents submitted that the application is sympathetic to the countryside in which it is situated and that it fails to protect the intrinsic character of the countryside by the density and mix of properties being proposed. It is felt that the development of 138 dwellings will intrude into an area of currently open, undeveloped, countryside resulting in an encroachment of built development extending beyond the settlement boundary of

Thurston. This will harm the character and appearance of this open area and will be contrary to Policy CS5 of the Core Strategy, Policy FC1.1 of the Core Strategy of the Mid Suffolk Core Strategy Focus Review (2012) and saved Policies H13 and H16 of the Mid Suffolk Local Plan. Furthermore it is felt that the development fails to ensure that it reflects the local character and identity of the area immediately surrounding the proposed development and is therefore inconsistent with paragraph 58 of the NPPF.

The Parish Council is of the opinion that the development is inappropriate in both size, density and style for an area on the very edge of Thurston. The proposed houses are not considered to be in keeping with the existing buildings and is more suited to that of an estate close to a town / village centre, with close access to local facilities. There appears to have been little consideration with regards to the residents of the existing adjacent properties. The proximity of the proposed dwellings to the existing properties on Heather Close, Furze Close, Rowan Way and Marley Close, is considered to be out-of-keeping with not only these but also other developments in the village. The proposed housing layout will result in the loss of privacy for the existing homes and gardens that surround the site. Views to the wider countryside will also be adversely impacted. The Parish Council feels that the loss of open space which contributes to the character or appearance of the village at this point is of such significance that the proposal will show that it materially reduces the amenity and privacy of adjacent dwellings and erodes the character of the surrounding area.

The Parish Council is also concerned that the density and mix of the housing being proposed fails to provide a mix of house types, sizes and affordability to cater for the many different accommodation needs. Of the 90 market properties, 61 are for 4+bed dwellings and the Parish Council fails to see how these are in accordance with NPPF para 50 which states that housing development should "deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities" and does not 'plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own Homes'.

The Parish Council feels that the proposal has failed to identify the size, type, tenure and range of housing that is required in Thurston and fails to take into account the particular locations and fails to reflect local demand.

3. The Parish Council considers that the application fails to take into account the current road infrastructure and the lack of pedestrian route-ways and cycle ways leading from the site to the amenities and both Primary and Secondary Schools within the village and as such would have a negative impact on road safety and therefore a detrimental impact on the amenities enjoyed by the surrounding area vis-à-vis traffic generation (SB2 Development Appropriate to its Setting & T10 Highway Considerations in Development).

There is no provision of adequate pedestrian crossing points along Barton Road for those wishing to access both the Community College, Primary School and other village facilities. This is contrary to NPPF Paragraph 32 which in part states that "safe and suitable access to the site can be achieved for all people". The Parish Council is concerned that the application fails to show the provision of an adequate footway directly serving the development to the existing footway further along Barton Road. Given the increase in pedestrian use of the existing pathway further along Barton

Road that this development will bring the Parish Council feels that improvements for the crossing of Barton Road are warranted.

It is furthermore held that as the development fails to demonstrate that it has considered safe and suitable access points for all people it is contrary to paragraph 32 of the NPPF. As the development fails to give priority to pedestrian and cycle movements and, with reference to the siting of this application, would not support the transition to a low carbon future, it is felt that it is unable to meet the environmental dimension of sustainable development and would be contrary to paragraph 17, 30, 35 and 55 of the NPPF and Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review.

The Parish Council feels that the development of the site will not be able to allow for the convenient integration of public transport within the site and that the traffic that will be generated will not be able to be accommodated on the existing road network (CS6 – services and infrastructure).

4. The Parish Council has concerns over the single access being proposed onto Barton Road. It feels that the risk of obstruction of a single access in times of emergencies makes the proposal unsustainable and fails to follow Planning Guidance which states that streets should be designed to support safe behaviours, efficient interchange between travel modes and the smooth and efficient flow of traffic. The transport user hierarchy should be applied within all aspects of street design – and should consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like emergency vehicles and finally other motor vehicles. The Parish Council concurs with the concerns raised by the Neighbourhood Plan Team over the plans to have a single entrance road to/from the development directly onto Barton Road with no pedestrian footpath.
5. The Parish Council feels that given the location of the site, a reliance on the private motor car will be generated in order to access amenities and services within both the village and further afield which will also be contrary to the sustainability objectives of Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012) and the NPPF paragraphs 14, 17, 55 and 56 and will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway bridge crossings on Barton Road and Thedwastre Road, entry and exit points onto the A14 and the junction of Thurston Road, Great Barton and A143.

The Transport Assessment report submitted as part of the planning application states that

“As highlighted in Paragraphs 2.11 and 2.12, although superseded by the NPPF, PPG 13 recommended the substitution of short car trips for walking (where the journey is under 2 km) and cycling (where the journey is under 5 km). These shorter trips should, where possible, be integrated with the use of public transport modes for longer journeys”

Whilst there are bus stops along Barton Road to Bury St Edmunds and Stowmarket making this a possible alternative to using private motor cars, the Parish Council is concerned that given the location of the site there will be such a reliance on the private motor car in order to access local amenities and services that significant pressure will be placed on known existing pinch points such as the junctions of Norton Road and Ixworth Road.

Barton Road is also considered to be a highly used road and is likely to deter cyclists. Current data collected from the Parish Council sited Vehicle Activated Sign along Barton Road indicates that between 23rd September and 11th October 2016 there were 21,628 traffic movements travelling East and 13,506 traffic movements travelling West.

The Transport Assessment has also indicated that a Travel Plan is required, which the Parish Council believes should have been submitted at the time of the planning application in accordance with NPPF para 36 which states that 'A key tool to facilitate the objectives of para 35 will be a travel plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan'. The Parish Council would welcome the opportunity to comment further on details but would request that such a plan is submitted showing how the uptake of sustainable travel is to be implemented and how the developers will promote the use of public transport, car sharing and/or use of the cycle given the comments above.

6. The Parish Council would also like to recommend that Suffolk County Council be involved in the discussion of future growth in Thurston with reference to the impact that this will have on the provision of education. As mentioned within the letter from Thurston's Neighbourhood Plan Team, both the Thurston Primary Academy School and Thurston Community College are at capacity (taking into account existing planning approvals) and as such this application will ensure that the educational infrastructure is unlikely to meet the demand placed on it by 138 dwellings. As such the Parish Council feels that this application will put a negative strain on the existing infrastructure and as such would be contrary to Policy CS6 of the Core Strategy.

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

Yours sincerely,

Victoria S Waples

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



NEIGHBOURHOOD PLAN TEAM

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



Councillor P Robinson
Chair of Thurston Planning Committee
Thurston Parish Council
New Green Centre
Thurston
IP31 3TG

22nd November 2016

Dear Cllr. Robinson,

Re: Planning Application – 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.

Please be advised that the Thurston Neighbourhood Plan Team have considered this application and have the following general comments to make:

- The Neighbourhood Plan Team would 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, have been made during the attendance of representatives from either Artisan Planning or Bovis Homes at any Neighbourhood Plan Meetings.
- Thurston Parish Council is at a relatively advanced stage in preparing a Neighbourhood Plan and whilst the plan has not yet reached the 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 2016, should be afforded some weight in responding to this application. This site was not submitted as part of the Neighbourhood Plan Process but is known to have been submitted as part of MSDC's Strategic Housing Land Availability Assessment. A request was made in June 2016 for the site to be formally assessed by the Neighbourhood Plan Team and is referred to as Site 19. The results of the assessment on the land submitted by the agent on behalf of Bovis Homes by the Neighbourhood Plan Team has raised a number of issues which the Neighbourhood Plan Team feel are so major and fundamental as to override any acknowledgment of the site's "neutral" assessment. Comments raised by the public following the public consultation on the site assessments have also been incorporated into the process and the revised site assessment overall summary has not changed from that of 'neutral'. A copy of this site assessment is attached to this letter.
- The Neighbourhood Plan Team is disappointed at the speed at which this and another application 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 impact that each development will have as a whole 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'.

With particular reference to the planning application submitted:

- Generally the Neighbourhood Plan Team feels that the Application shows an unimaginative off the shelf design and fails to show any respect for the fact that it abuts countryside on one side and an existing housing development on the other. It is felt that the allocated formal 'open spaces' are not in keeping with the surrounding area and that the current layout was more in keeping with a high density housing

estate and not that of a rural village beyond the limits of the Built Up Area Boundary. The Team also felt that the inclusion of 2.5 – 3 storey dwellings at this point of the village was not considered to be in-keeping with the general characteristic of a rural village. The Neighbourhood Plan Team felt that there was also a need for better screening around the edge of the site, along the existing road in order to ensure that the new development enhanced and protected the existing natural environment, wildlife networks and biodiversity.

- The Neighbourhood Plan Team is disappointed that within the application submitted there is little evidence to show that the scheme is set to encourage the development of appropriate housing stock that reflects the needs of current and future residents. The Team is concerned that the density is higher than that of surrounding areas and is not in-keeping with that of a rural village. The market housing proposed in this application comprises 90 dwellings of which 81 are for 4+ bedrooms. The majority of those who have responded to the public consultations held by the Neighbourhood Plan Team have indicated that there is a desire to ensure future growth reflects the community wish for starter homes for local first time buyers; bungalows and 1 - 2 bedroom houses.
- The Neighbourhood Plan Team would like to reiterate that, whilst it is generally appreciated within the village that as a Key Service Centre and a village on the A14 corridor with a good rail link there will be growth within the village, there is a preference for this growth to be handled sympathetically and on sites of no more than 50 houses. The Neighbourhood Team would have liked to see the Planning Application draw on this preference and to have divided the site into separate areas using hard and soft landscaping techniques to ensure that the design preserves and enhances the built, natural and historic environment of the local area as well as maintaining and enhancing its distinctive characteristics.
- It is acknowledged in the documents submitted by the applicant that the proposed residential development would result in an increase in the vehicular movements from the site and that given the number of dwellings proposed that this has not been assessed to be at a level that would result in a significant impact upon the local road network that could not be adequately assessed by an appropriate transport assessment.

The Neighbourhood Plan Team feels that given the location of the site little reference has been made to the current road infrastructure and the impact that the development will have on the junctions of Fishwick and Pokeridge Corners for those accessing the A14 via the narrow bridge on Barton Road. It is recognised that both areas have a high proportion of incidences involving more than one vehicle and yet there is only mention of a financial contribution towards the physical improvement works proposed to the Fishwick Corner junction (signing and road marking). As it is expected that direct access to this route will be under the very narrow Railway Bridge, the Neighbourhood Plan would expect further consideration to be given to traffic improvements at this point.

Further to the above, whilst the proposal is positioned to enable traffic generated by the proposal to access the main vehicular routes of the A143 and A14 without passing the site at land South of Norton Road, the Neighbourhood Plan Team feels that there will be a cumulative impact of this and other developments upon the local network and that an Environmental Impact Assessment for both Thurston and Great Barton should have been submitted with the Planning Application.

- It was further agreed that the Neighbourhood Plan Team was concerned that there were no plans to install safe pedestrian footpaths from the site to the existing footpath that leads to shops or amenities and that no reference has been made to the fact that all pavements should be made suitable for motorised buggies nor was there any mention of cycle lane provision.

Although the Transport Assessment Report states that there are footpaths running adjacent to Barton Road, from Mill Lane to Marley Close there is a single footpath on its eastern side and at Marley Close, the footpath crosses the road and runs along the western side of Barton Road, there are no direct safe pedestrian footpaths linking that from Marley Close to the entrance of the site further along Barton Road. The Neighbourhood Plan Team is also concerned that there are no safe pedestrian crossing points along the whole of the route of Barton Road. The plans indicate that the single entrance road to the development will come straight out onto Barton Road with no pedestrian footpath. The route into the village along Barton Road could be made reasonably safe by providing a short pedestrian footpath and a pedestrian crossing to the other side of the road which would then link to the existing footpath to educational establishments or amenities that are access by the crossing of the road.

The Neighbourhood Plan Team is also aware that whilst the centre of the site is within the preferred distance for commuting to school, it is apparent that around 50% of the site will be in excess of this maximum distance. Given that the Transport Assessment Report states that it is recommended that short car trips are substituted for walking (where the journey is under 2 km) and cycling (where the journey is under 5 km) the Neighbourhood Plan Team feels that this distance will encourage as

opposed to reduce the use of the car thereby increasing the negative impact that this development will have on the local road network.

- The application states that although the site is within the predominately rural district of Mid-Suffolk, Thurston has links by both bus and rail to Bury St Edmunds and Stowmarket and rail to Cambridge and Ipswich that provide onward links to rural and national services via their Bus and Railway Station(s). Whilst the Neighbourhood Plan Team accepts this fact, there is concern that there has been little or no assessment of the impact on the railway station that this and other developments will have and the fact that car parking at the station is already an issue.
- The Neighbourhood Plan Team would also like to draw to the Parish Council's attention the impact that such a development will have on the education provision within Thurston. The Team has been informed by Suffolk County Council that Thurston Church of England Primary Academy is currently at capacity (this takes into account current housing commitments only) and that the consequence that any future growth will have must include detailed discussions about infrastructure mitigation. It is also noted that Thurston Community College is also at capacity and that it is unlikely that the school will be supported to grow much bigger than it is now: Given that 200 additional homes by 2031 will yield 50 Primary Pupil Places; 36 Secondary Pupil Places and 8 Secondary 16+ Places the Neighbourhood Plan Team has concerns that this provision will not be met locally and that there will be a need for pupils to be 'bussed' outside of the village. This unsustainable situation will also have a negative impact on traffic, bus stops and road congestion within the village.

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

- road safety with particular emphasis on the junctions of Thurston Road (Great Barton) and the A143
- road safety with particular emphasis on the junctions of Fishwick and Pokeridge Corner for those accessing the A14 via the narrow bridge on Barton Road
- pedestrian safety as there are no safe crossing points
- loss of character of the village
- development inappropriate to that of land abutting the countryside
- concern for the amount of development on the site
- village infrastructure particularly provision of education and traffic
- type and density of housing mix
- cost of affordable homes for local residents

In summary, whilst the Neighbourhood Plan Team recognises the need for future development within Thurston, it does not support the submission in its present guise for the concerns outlined above.

Yours faithfully,

Victoria S Waples

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

Copy to:
Corporate Manager – Development Management
MSDC
131 High Street
Needham Market
Suffolk
IP6 8DL

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



12 December 2016

James Platt
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

By email only

Hi James

Application: 4386/16

Location: Land on the west side of Barton Road, Thurston IP31 3NT

Proposal: 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

Thank you for consulting Place Services on the above application.

I have no objections subject to conditions and securing offsite skylark mitigation eg nest plots on arable land nearby.

1. The site and ecology

The site contains Priority habitat – hedgerow – and is likely to support Priority species – bats, amphibians, reptiles, hare, skylark and potentially hedgehog – as well as an assemblage of breeding birds.

2. The information provided by the applicant

2.1 I have reviewed the ecological material submitted - the (Preliminary) Ecological Appraisal (Mill House Ecology October 2015). I am satisfied that this report is based on all necessary field surveys with data being adequate and up to date and supported by adequate and appropriate desk studies. No further surveys are considered necessary before determination of this application.

2.2 The report provides a summary of all species and habitats likely to be affected and describes the likely impacts. It also explains how proposed mitigation will address likely effects and how such measures will be secured through planning conditions. However an assessment of likely impacts on skylark is also necessary to inform reasonable mitigation measures to be secured offsite.

2.3 Survey and assessment of biodiversity features has been carried out by suitably qualified ecologists at the appropriate time of year, using appropriate methodologies and the report written



in accordance with CIEEM report writing guidelines. There is recognition of the limitation that the site visit carried out in September 2015, imposed on breeding birds and the sugar beet crop in 2015 had on the likelihood of nesting or foraging skylarks has been acknowledged.

3. Likely impacts of development:

3.1 Adverse impacts from the proposed development upon Priority habitats, as well as Protected and Priority species, have been identified and these will be mitigated in line with relevant wildlife legislation and planning policy.

However there is an additional requirement for offsite skylark mitigation eg nest plots on arable land nearby similar to agri-environment option AB4 skylark plots, which will need to be secured by legal agreement.

3.2 Timing of operations eg clearance of hedgerow for access will be required to avoid anyone connected with project from committing an offence of disturbing nesting birds. Section 4 (Recommendations) of the submitted Ecological Appraisal (Mill House Ecology Oct 2015) will need to be secured by planning condition.

3.3 Amphibians and reptiles

Subject to a condition to implement the mitigation measures contained in the submitted Ecological Appraisal, I am satisfied that will be no significant adverse impacts on Gt crested newt, a European Protected Species, and other amphibians and reptiles.

3.4 Bats

Through the retention of boundary trees and biodiversity improvements, the development of the application site is considered unlikely to result in significant habitat loss effects on foraging /commuting bats, provided a sensitive lighting scheme is implemented. The lighting design will therefore need to minimise impacts on bats to avoid deliberate disturbance to these European Protected Species. A detailed & sensitive Lighting scheme will need to ensure that the vegetated features on the site are not illuminated to a level greater than 1 lux. This is required in order to adequately minimise the impact of the development on bats.

I am satisfied that will be no significant adverse impacts on these European Protected Species, subject to appropriate conditions to protect the retained trees and hedgerows (and to control exterior lighting), which are important bat foraging and commuting routes.

3.5 Breeding birds

Subject to appropriate conditions being attached to any consent to secure the mitigation measures as recommended in the submitted Ecological Appraisal, particularly during construction, I am satisfied that will be no significant adverse impacts on nesting birds.

3.6 Priority habitat - hedgerow

The loss of a section of roadside hedgerow to provide site access will require replacement planting within the development and appropriate ongoing management to ensure ecological functionality for this Priority habitat.



In accordance with CIEEM report writing guidelines. There is recognition of the limitation that the site visit carried out in September 2015, imposed on breeding birds and the sugar beet crop in 2015 had on the likelihood of nesting or foraging skylarks has been acknowledged.

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3.6 Priority habitat - hedgerow

The loss of a section of roadside hedgerow to provide site access will require replacement planting within the development and appropriate ongoing management to ensure ecological functionality for this Priority habitat.



3.7 Priority species

In addition to mitigation during construction, confirmation that all the fencing within the development is hedgehog-friendly as mitigation for loss of connectivity for this Priority species.

I am satisfied therefore that there will be no significant adverse impacts on the Priority Species likely to be present on site, subject to appropriate conditions for clearance and hedgehog friendly fencing throughout the development.

4 Biodiversity enhancements

Biodiversity enhancements should be incorporated into the design of the development in accordance and I am satisfied that the enhancement recommendations set out in the submitted Ecological Appraisal are appropriate and reasonable.

However I would welcome a discussion about an additional enhancement opportunity, to fit integrated bird boxes for swift, a Priority species, into the building design.

5 Recommendations

The mitigation measures identified in the Ecological Appraisal (Mill House Ecology Oct 2015) should be secured and implemented in full. This is necessary to conserve and enhance Protected and Priority Species particularly bats, reptiles, hedgehogs and breeding birds.

I would also expect the preparation of a long term Landscape & Ecological Management Plan (LEMP), prior to 1st occupation. Submission for approval and implementation of these plans in full should be a condition of any planning consent.

I. PRIOR TO COMMENCEMENT: COMPLIANCE WITH ECOLOGICAL APPRASAL RECOMMENDATIONS

"All ecological mitigation measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal (Mill House Ecology, Oct 2015) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

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

II. PRIOR TO COMMENCEMENT: SKYLARK MITIGATION STRATEGY

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

III. PRIOR TO SLAB LEVEL: BIODIVERSITY ENHANCEMENTS

"All ecological measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal (Mill House Ecology, Oct 2015), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination"



IV. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

- a. *"Prior to occupation, a Landscape and Ecological Management Plan (LEMP) for the landscape buffer and habitats on-site shall be submitted to and be approved in writing by the local planning authority. The content of the LEMP, shall include the following:*
- a) Description and evaluation of the features to be managed and enhanced*
 - b) Aims and objectives of management*
 - c) Appropriate management options for achieving aims and objectives*
 - d) Prescriptions for management actions*
 - e) Preparation of a work schedule (including annual work plan capable of being rolled forward over a five year period)*
 - f) Details of the body or organisation responsible for implementation of the plan*
 - g) Ongoing monitoring and remedial measures*
- b. *The LEMP shall also include details of the legal and funding mechanisms by which the long term implementation of the plan will be secured by the developer with the management body responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."*

V. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME

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

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

6. Reasons

6.1 The applicant has provided sufficient information to allow the LPA to discharge its duties under the UK Habitats Regulations.

6.2 The applicant has provided sufficient information to allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended.

6.3 The applicant has provided sufficient information to allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority habitats & species)



7 Conclusion

I agree that the works will result in impacts on important ecological features including Priority hedgerow habitat and could impact on Protected and Priority species. However with mitigation secured, these impacts will be minimised such that the proposal is acceptable subject to the above conditions based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

I have made these recommendations in order to minimise the impact of the proposal on ecology and having due regard for the NPPF and Policy CS5, as well as the statutory obligations of the Local Planning Authority.

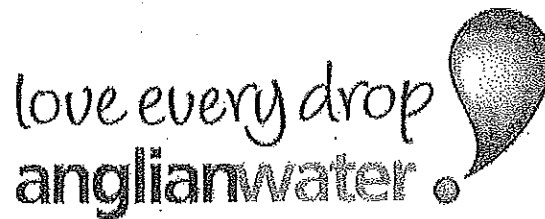
Please contact me with any queries.

Best wishes

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

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.



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00018541
Local Planning Authority: Mid Suffolk District
Site: Land on the west side of Barton Road,
Thurston
Proposal: Creation of 138 x C3 Dwellings
Planning Application: 4386/16

Prepared by: Mark Rhodes

Date: 13 December 2016

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

ASSETS

Section 1 – Assets Affected

- 1.1 There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

"Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence."

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

- 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 Development may lead to an unacceptable risk of flooding downstream. The drainage strategy prepared in consultation with Anglian Water suggested connection should be made via a gravity regime. However the FRA submitted with this application states that a pumped regime will be required to drain some foul flows. We would wish to see a proposed pumped rate and rising main layout in order to determine whether a pumped connection could be accommodated in the receiving network without causing an unacceptable risk of flooding downstream

We will request a condition requiring the drainage strategy covering the issue(s) to be agreed.

Section 4 – Surface Water Disposal

- 4.1 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

Section 6 – Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

Foul Sewerage Network (Section 3)

CONDITION

No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

From: Philippa Stroud
Sent: 09 December 2016 10:30
To: James Platt
Subject: 4386/16/FUL Land on the west side of Barton Road, Thurston - Other Issues

WK/186847

Dear James,

Ref: 4386/16/FUL EH – Other Issues
Location: Land on the west side of Barton Road, Thurston IP31 3NT
Proposal: 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

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

I note that a foul water pumping station will be necessary and that space is reserved for this in the north-east corner of the application site. Could the applicant be asked to provide further details please, regarding its noise specification, mitigation measures etc., calculated to the nearest residential boundary and for us to be re-consulted when this information becomes available.

Regards,

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

Telephone: 01449 724724

Email: Philippa.Stroud@baberghmidsuffolk.gov.uk
Websites: www.babergh.gov.uk www.midsuffolk.gov.uk



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

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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: 4386/16

Referring to the planning application referenced above, dated 18 November 2016, application for the 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, notice is hereby given that Highways England's formal recommendation is that we:

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

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

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

Signature: 	Date: 12 December 2016
Name: David Abbott	Position: Asset Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
david.abbott@highwaysengland.co.uk	



James Platt
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

14/12/2016

Dear James,

RE: 4386/16 Erection of 138 dwellings and associated infrastructure. Construction of new vehicular access and provision of cycle/pedestrian link to Barton Road. Land on the west side of Barton Road, Thurston, IP31 3NT Thurston

Thank you for sending us details of this application. We have read the ecological survey report (Mill House Ecology, October 2015) and note the findings of the consultant. We have the following comments on this proposal:

Hedgerows (UK and Suffolk Priority Habitat)

The ecological survey report identifies that the hedgerow on the eastern boundary of the site, alongside Barton Road, is a native species rich hedge which is likely to provide foraging and commuting habitat for bats and nesting habitat for birds, including UK and Suffolk Priority species such as dunnock and yellowhammer. Hedgerows are also a UK and Suffolk Priority habitat. Whilst the ecological survey report states that only a small section of this hedgerow will be removed to create a vehicular access, the Tree Constraints plan (drawing number LSDP 11341-01) shows the whole length of hedgerow being removed. This would represent a considerable loss of a Priority habitat, contrary to the requirements of National Planning Policy Framework (NPPF) and the Mid Suffolk Core Strategy Development Plan Document.

Any development should retain all existing semi-natural habitats, suitably buffer them and ensure that they are managed to maximise their biodiversity value in the long term.

Protected and/or UK and Suffolk Priority Species

Bats

The ecological survey report identifies that boundaries of the site provided suitable foraging and commuting habitat for bats and that some offsite mature trees may provide suitable roosting habitat. The report recommends that a sensitive lighting strategy is implemented in order to maintain these foraging and commuting opportunities. We recommend that an external lighting strategy and plan is produced to demonstrate that the proposed development can maintain these features as 'dark corridors', no light spill of greater than 1 lux (equivalent to bright moonlight) should be able to reach retained (and new) habitats.

Nesting Birds

The proposed removal of the eastern hedgerow will result in the loss of habitat for nesting birds, possibly including those designated as UK and Suffolk Priority species. As recognised in the ecological survey report, the site also offers potential nesting habitat for skylark (dependent on the crop rotation). Skylark are also a UK and Suffolk Priority species under Section 41 of the Natural Environment and Rural Communities (NERC)

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Act (2006). Unmitigated, the proposal will therefore result in a net loss of habitat suitable for nesting birds, including this designated as UK and Suffolk Priority species.

The site is also likely to support brown hares and hedgehogs, both of which are UK and Suffolk Priority species. Mitigation for impacts on these species should therefore be secured, should consent be granted.

Conclusion

As presented the proposed development would result in the loss of UK and Suffolk Priority habitat and adverse impacts on UK and Suffolk Priority species. We therefore consider that this is contrary to the requirements of the National Planning Policy Framework (NPPF) and Mid Suffolk DC's Core Strategy DPD. Consent should not be granted for development contrary to national and local planning policy.

Notwithstanding the above, should it be considered that development in this location is acceptable, we request that the recommendations made within the ecological survey report are implemented in full, via a condition of planning consent, should permission be granted. Development also should seek opportunities to enhance biodiversity wherever possible on this site. This should include ensuring that all greenspaces are managed to maximise their biodiversity value in the long term.

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

Yours sincerely

Jill Crighton
Conservation Planner

From: Linda Harley [mailto:harley.parish@btinternet.com]
Sent: 14 December 2016 10:45
To: Planning Admin
Subject: Response to Consultation 4386/16

Good Morning

Gt Barton Parish Council were asked to comment on the following application as it directly borders their Parish. Unfortunately, due to illness our comments are slightly late but we hope you will still take them into consideration.

Erection of 138 dwellings on land on the West Side of Barton Road, Thurston -
4386/16

Great Barton Parish Council (GBPC) has read and supports the concerns raised by Thurston Parish Council. GBPC also objects to the application for the following reasons that are of relevance to this parish:

1. The Transport Assessment (TA) submitted with the application fails to take into account the committed schemes within Bury St Edmunds, Ixworth and Stanton. These committed schemes will alter the baseline traffic flows along the road network that the TA has reviewed for this scheme. It is inappropriate to ignore these committed schemes and means that the true impact of this development is likely to be far worse;
2. The TA also ignores the proposals coming forward in Thurston, which although not yet approved will give rise to cumulative impacts if approved. The Council must understand the potential cumulative impact of these possible schemes before determining this application. Failure to do so will mean that mitigation measures to address this cumulative impact will not be fairly divided between the developments and may not be reasonable to request.
3. The findings of the TA suggest that the junction on the A143 adjacent to the Bunbury Arms does not require mitigation. This is a heavily congested junction that causes delay along the A143. It is inconceivable that the proposal does not impact on this junction - with or without other schemes.
4. Thurston Community College is the secondary school serving Great Barton. As such, schemes that influence the capacity of that school have a direct impact on the residents of Great Barton. This school is operating at capacity and SCC's latest Directory of Schools in Suffolk confirms that the school had more applications than places available last year. This is a school that has recently expanded to take on extra students during the previous education reorganisation. GBPC is concerned that school does not have sufficient capacity to support significant new residential development within its catchment area with a direct and negative consequence for the residents of Great Barton.
5. The boundary of the application site is adjacent to the parish boundary with Great Barton. That boundary is currently the rural edge of both Thurston and Great Barton. The character of this edge will be eroded by the proposed

development with a negative impact on the rural character in this area. The proximity of housing to this edge provides insufficient space for meaningful landscape and variation in plot depth to mitigate this impact.

GBPC believes that the scheme in its current form is unacceptable and should not be approved. For the reasons given above GBPC considers that the proposal is contrary to the NPPF and that the benefits of the scheme are significantly and demonstrably outweighed by the impacts identified. The proposal is not considered to represent sustainable development and therefore does not benefit from a presumption in favour of permission.

GBPC is also concerned that this proposal is undermining the Neighbourhood Plan-making process that Thurston Parish Council is currently undertaking. It is important that the Council gives this matter careful consideration and adequately addresses this point in its decision-making.

Please contact me if you have any questions. Many thanks,

Linda

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

Telephone: 01284 787777



Consultation Response Pro forma

1	Application Number	4386/16 – Erection of 138 dwellings – Land of the west side of Barton Road - Thurston	
2	Date of Response	19 th December 2016	
3	Responding Officer	Name:	Louise Barker
		Job Title:	Housing Enabling Officer
		Responding on behalf of...	Strategic Planning
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<div style="border: 1px solid black; padding: 5px;"> <p>This is a development proposal for 138 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 48 affordable housing units.</p> </div> <p>1. Housing Need Information:</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>2. Choice Based Lettings Information:</p> <p>2.1 The Council's Choice Based Lettings system currently has circa 1000 applicants registered for housing in Mid Suffolk. Currently there are circa 25 applicants registered with 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 1003 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>3. Recommended Affordable Housing Mix:</p> <p>3.1 It is noted that the design and access statement with this application proposes 35% affordable housing which is welcomed. 35% affordable housing on this proposal based on 138 units equates to 48 AH units.</p> <p>3.2 Based on the above information, the following mix is recommended:</p> <p>Affordable Rent Tenancy = 36 units as follows:</p> <ul style="list-style-type: none"> • 10 x 1b 2p flats @ 50sqm • 2 x 1b 2p bungalows @ 50sqm • 2 x 2b 4p bungalows @ 70sqm • 16 x 2b 4p houses @ 79sqm • 5 x 3b 6p houses @ 102sqm • 1 x 4b x 7p house @ 115sqm <p>Shared Ownership = 12 units as follows:</p> <ul style="list-style-type: none"> • 8 x 2bed 4p houses @ 79sqm • 4 x 3bed 6p person houses @ 102sqm <p>(Recommended nationally described space standards.)</p>
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	<p>4. Other requirements for affordable homes:</p> <ul style="list-style-type: none">• 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 under Housing and Affordable Housing for full details.• AH dwellings must be tenure blind.
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		<p>5. Open Market Homes Mix:</p> <ul style="list-style-type: none"> • 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. • It is noted that a number of bungalows/chalet bungalows are proposed and this is welcomed. A small number of 2 bed flats would also be recommended. • The 2011 census shows 85.1% under occupied households in Thurston. (ONS 2011 Census:QS412EW). • 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. Hence we would be looking for less 4 bed houses and a greater amount of 2 beds than are proposed. • 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.
6	<p>Amendments, Clarification or Additional Information Required (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	Recommended conditions	
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Midlands & East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF

Email address: kerryharding@nhs.net

Telephone Number – 0113 824 9111

Your Ref: 16/4386

Our Ref: NHSE/MIDS/16/4386/KH

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

07 December 2016

Dear Sirs,

**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.**

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 138 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 is 1 GP practice within a 2km catchment (or closest to) the proposed development. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Impact Assessment

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

5. The primary healthcare service 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 within a 2km radius of (or closest to) the proposed development.

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Mount Farm Surgery	12,244	768.40	11,206	-71.19
Total	12,244	768.40	11,206	-71.19

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 120m² 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 within the existing healthcare premises servicing the residents of this development, by way of reconfiguration, refurbishment, extension, or relocation at Mount Farm Surgery would be sought from the CIL contributions collected by the District Council.
7. Although, due to the unknown quantities 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 reconfigure 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.

Yours faithfully



Kerry Harding
Estates Advisor

High quality care for all, now and for future generations

Your ref: 4386/16
Our ref: 00046430
Date: 07 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear James,

Re: Thurston, land West of Barton Road - Erection of 138 dwellings

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

Your ref: 4386/16
Our ref: Thurston – land west of
Barton Road 00046430
Date: 20 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear James,

Thurston: land west of Barton Road – developer contributions

I refer to the planning application for the erection of 138 dwellings with construction of a new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space.

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £29,808 towards libraries provision.

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

I set out below Suffolk County Council's response, which provides the infrastructure requirements associated with this planning application and this will need to be considered by Mid Suffolk District Council. This consultation response considers the cumulative impacts on education arising from existing planning

applications which, when including the 138 dwellings from this proposed development, amount to a total of 827 dwellings.

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

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

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

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

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

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

Community Infrastructure Levy

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

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

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

- Provision of waste infrastructure

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

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

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

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

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

School	Capacity				Actual/Forecast Pupil Numbers				
	Permanent	98%	Special	Total	2016-17	2017-18	2018-19	2019-20	2020-21
Thurston CE Academy	210	200		200	196	211	212	208	208
Ixworth Free School (11 - 16)	597	587	0	597	271	300	342	360	344
Thurston Community College (11 - 16)	1500	1425	0	1,425	1,561	1,599	1,585	1,547	1,547
11-16 total places	2097	1992		1992	1,832	1,899	1,827	1,897	1,891
Thurston Community College (with Sixth Form)	1940	1,843	0	1,843	1,828	1,840	1,862	1,872	1,868

School level	Minimum pupil yield:	Required:
Primary school age range, 5-11:	29	29
High school age range, 11-16:	20	0
Sixth school age range, 16+:	4	0

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

Primary School

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

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

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

Regarding out of catchment schools, major studies have shown that each transfer can result in a 6 month dip in standards as a minimum. 40% will eventually recover but 12% of pupils suffer long term negative effects. 2-tier pupils always out-performed 3-tier pupils at GCSE in the past and whilst the additional transfer isn't the only reason it does have a negative effect.

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

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

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

In addition to the above a lot of work is involved in transferring a pupil cohort from one school to another. There's the preparation and handover of pupil records to ensure the new school is made aware of each child's history, progress, health, needs and other agencies' involvement etc... to ensure continuity of their learning. There's also the pastoral care of all children so they

feel comfortable with the change. Vulnerable and looked after children and those with SEN and behaviour difficulties and their parents have to be supported particularly sensitively and this could involve anything from regular visits to the school to staff working across the two schools for a period of time.

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

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

The County Council will require proportionate developer contributions for land and build costs for a new school from this proposed development, which will need to be secured by way of a planning obligation. A proportionate developer contribution, based on the 29 primary age pupils forecast to arise from the proposed development is calculated as follows

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school
- $\frac{£6.9m}{420 \text{ places}} = £16,429$ per pupil place
- From 138 dwellings it is forecast that 29 primary age pupils will arise
- Therefore 29 pupils x £16,429 per place = **£476,441 (2016/17 costs)**

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £543,620 for a 2.2 hectare site and equates to £1,294 per pupil place. For the proposed development, this equates to a proportionate land contribution of 29 places x £1,294 per place = **£37,526**.

At present two planning applications (under references 5070/16 and 4963/16)

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

Temporary classroom costs

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

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

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

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

As an Academy the County Council has limited control over their decision whether or not to accept a temporary building on their site – the Academy could refuse to take the extra (temporary) pupils and the County Council would

have limited powers to impose this on them. Iain Maxwell (Assistant Senior Infrastructure Officer in SCC's, Children and Young People Service) met with the Head teacher and 3 Governors on Thursday 26th January 2017 to explain the situation. Although there were reservations from the school the overall response was to accept in principle the installation of the temporary classroom if it was needed, providing there was evidence that the new school would be built and open in the early stages of the housing developments to minimise the length of time the temporary building would remain on site. Formal acceptance in writing from the school has now been received.

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

The proportionate temporary accommodation contribution is calculated as follows:

- Cost of a temporary accommodation £250,000
- Cost per place = $\frac{£250,000}{60} = £4,167$
- Primary age pupils arising from this site is 29
- Proportionate contribution towards temporary classroom is 29 pupils x £4,167 per place = £120,843

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

Secondary Schools

The catchment secondary schools are Ixworth Free School and Thurston Community College. Thurston Community College has the largest secondary school catchment area in Suffolk. At present there is forecast to be sufficient surplus places available for pupils forecast to arise from the proposed development, with any expansion projects currently falling under CIL.

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

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

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

At present, in the Thurston area, there are four settings that offer places (2 childminders, Thurston Preschool and Tinkerbells Day Nursery). From a development of 138 dwellings, the County Council anticipates around 14 pre-school pupils eligible for funded early education. Based on the scale of development currently being assessed in Thurston, the proposed legislative changes and the intention to establish a new primary school (with nursery provision), the most practical approach is to establish a new early education setting on the site of the new primary school which would be a 30 place setting, providing sufficient capacity for 60 children in total. Our latest estimates are that a 30 place early education setting costs £500,000 to construct on a site of approximately 630m² (note: this includes outdoor play and parking).

The Mid Suffolk Regulation 123 List indicates that new early years settings are not identified for funding through CIL. A proportionate contribution, based on 14 children of the total 60 who would be accommodated within the new setting, could be calculated as follows (revised costs from a similar scheme in Suffolk):

- £500,000 construction cost (including land as collocated with the new primary school) for a new 60 place setting
- £500,000/60 early years pupils = £8,333 per place
- From 138 dwellings there is the need for 14 additional places

- Therefore 14 pupils x £8,333 per place = **£116,662 (2016/17 costs)**

- 3. Play space provision.** Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:
 - a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
 - b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
 - c. Local neighbourhoods are, and feel like, safe, interesting places to play.
 - d. Routes to children's play spaces are safe and accessible for all children and young people.

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

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

- 5. Supported Housing.** Section 6 of the NPPF seeks to deliver a wide choice of high quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, may need to be considered as part of the overall affordable housing requirement. Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard. In addition we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the Mid Suffolk housing team to identify local housing needs.
- 6. Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of

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sustainable drainage systems.

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

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

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

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

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

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

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

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

- 9. Legal costs.** SCC will require an undertaking from the applicant for the

reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.

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

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

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

Yours sincerely,

P J Freer

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

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

From: Iain Farquharson
Sent: 28 February 2017 17:24
To: Leslie Short <leslie@artisan-pps.co.uk>
Cc: James Platt <James.Platt@baberghmidsuffolk.gov.uk>
Subject: M3 186846: Bovis Barton Road Thurston application ref. 4386/16

Hi Leslie

Thank you for your response however I do not believe all of my points have been addressed, please see additional comments based on your latest submission below. Could you revisit your report please.

4.ii additional energy savings. The content of this paragraph is just compliance with the domestic heating compliance guide and a commitment to use low energy lighting. The domestic guide is a common standard level and not an additional saving. Low energy lighting is also the standard position since the phasing out of inefficient lamps.

4i / 4ii The table of U values and psi values were used in the Soham example demonstrating a saving in emissions is possible

6.ii Part G calculation. Please provide this calculation as mentioned in the text.
Calculation received however it demonstrates 107.2 ltrs not the 105 mentioned in the text

6.v Materials. This refers to historic site performance. Is The Code being used at this site? If no how will the sustainability of the materials be demonstrated?

This has not been addressed, still referring to historic performance. Will The Code certification be used on this site? If not how will the sustainability of the materials be demonstrated?

6vi. What is 'Sustainability- The Mid Suffolk Approach'?
Clarification received

6vi Why is it difficult to accommodate renewable energy due to the landscape?, what 'aesthetics' will affect the landscape?

Still no justification as to why it is *difficult* to accommodate renewables at this site. This is a flat, open field anything is possible. The attempted justification that 'there are no visible PV panels on neighbouring properties' is not a valid reason.

6vii Please confirm the source of the 80% claim
The product found from the link provided provides constant light during dusk til dawn plus an additional large 100w of light when the PIR sensor is triggered. Therefore there is constant light pollution plus large energy use when triggered. LED lamps can provide the equivalent of 100w with a 10w unit. The PIR sensors purpose is to remove the need for constant light. This is not considered to be in line with the energy and carbon saving properties proposed.

6vii If there are 100% efficient light fittings throughout what is the reference to landings and corridors?
Explanation provided.

at 6vii...this is a generalisation again making reference to the Mid Suffolk Approach which acknowledges at para 3.7 that the environmental sensitivity and that of the rural local landscape in particular is such that large scale renewable energy generation or even other smaller scale forms, would be difficult to successfully assimilate into the landscape.

Para 3.7 specifically makes reference to large-scale, on-shore renewable energy generation. The proposals in this application are not large scale energy generation. They are small, localised (to the property) and definitely not difficult to assimilate into the landscape

7. Please clarify; what is the definition of 'if needed' in relation to the waste water heat recovery unit
Explanation provided

7. Please expand on the reasoning for not using PV 'due to local landscape characteristics'
See 6vi

8vi Renewable technologies are eluded to in this section but the whole report is geared towards fabric first, what technologies might be used and what circumstances?
Explanation received

8vii The development can attain exemplar status by the inclusion of WWHR contradicts 6viii which already claims exemplar status. The definition of exemplar is a perfect / shining example so good that it should be copied. The proposals are considered typical not exemplar.

8vii This section contradicts section 8vi
Clarification provided

8viii What measures are included to minimise unregulated energy use?

The offer to reduce unregulated energy use amounts to 1. Outside light which is not considered as energy saving as per note 6vii 2. 100% low energy fittings when 75% is required by Part L and generally speaking low energy fittings are the only style that can be purchased anyway. 3. An energy monitor which does not save any energy merely tells the occupant what is being consumed. The saving from an energy meter is minimal: 'Government estimates put the average saving at £23 a year by 2020 on combined gas and electricity bills'

https://www.ofgem.gov.uk/sites/default/files/docs/2011/03/consumersmartmeteringfs_0.pdf

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

☎ 01449 724878

✉ iain.farquharson@babermidsuffolk.gov.uk

Your ref: 4386/16
Our ref: Thurston – land west of Barton Road
00046430
Date: 05 March 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: 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 west of Barton Road

I refer to the planning application for the erection of 138 dwellings with construction of a new vehicular access and provision of cycle/pedestrian link to Barton Road. Provision of road and drainage infrastructure, landscaping and open space.

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

Place Services
Essex County Council
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12 December 2016

James Platt
Mid Suffolk District Council
Council Offices
131 High Street
Needham Market
Ipswich
IP6 8DL

By email only

Hi James

Application: 4386/16

Location: Land on the west side of Barton Road, Thurston IP31 3NT

Proposal: 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

Thank you for consulting Place Services on the above application.

I have no objections subject to conditions and securing offsite skylark mitigation eg nest plots on arable land nearby.

1. The site and ecology

The site contains Priority habitat – hedgerow – and is likely to support Priority species – bats, amphibians, reptiles, hare, skylark and potentially hedgehog – as well as an assemblage of breeding birds.

2. The information provided by the applicant

2.1 I have reviewed the ecological material submitted - the (Preliminary) Ecological Appraisal (Mill House Ecology October 2015). I am satisfied that this report is based on all necessary field surveys with data being adequate and up to date and supported by adequate and appropriate desk studies. No further surveys are considered necessary before determination of this application.

2.2 The report provides a summary of all species and habitats likely to be affected and describes the likely impacts. It also explains how proposed mitigation will address likely effects and how such measures will be secured through planning conditions. However an assessment of likely impacts on skylark is also necessary to inform reasonable mitigation measures to be secured offsite.

2.3 Survey and assessment of biodiversity features has been carried out by suitably qualified ecologists at the appropriate time of year, using appropriate methodologies and the report written



in accordance with CIEEM report writing guidelines. There is recognition of the limitation that the site visit carried out in September 2015, imposed on breeding birds and the sugar beet crop in 2015 had on the likelihood of nesting or foraging skylarks has been acknowledged.

3. Likely impacts of development:

3.1 Adverse impacts from the proposed development upon Priority habitats, as well as Protected and Priority species, have been identified and these will be mitigated in line with relevant wildlife legislation and planning policy.

However there is an additional requirement for offsite skylark mitigation eg nest plots on arable land nearby similar to agri-environment option AB4 skylark plots, which will need to be secured by legal agreement.

3.2 Timing of operations eg clearance of hedgerow for access will be required to avoid anyone connected with project from committing an offence of disturbing nesting birds. Section 4 (Recommendations) of the submitted Ecological Appraisal (Mill House Ecology Oct 2015) will need to be secured by planning condition.

3.3 Amphibians and reptiles

Subject to a condition to implement the mitigation measures contained in the submitted Ecological Appraisal, I am satisfied that will be no significant adverse impacts on Gt crested newt, a European Protected Species, and other amphibians and reptiles.

3.4 Bats

Through the retention of boundary trees and biodiversity improvements, the development of the application site is considered unlikely to result in significant habitat loss effects on foraging /commuting bats, provided a sensitive lighting scheme is implemented. The lighting design will therefore need to minimise impacts on bats to avoid deliberate disturbance to these European Protected Species. A detailed & sensitive Lighting scheme will need to ensure that the vegetated features on the site are not illuminated to a level greater than 1 lux. This is required in order to adequately minimise the impact of the development on bats.

I am satisfied that will be no significant adverse impacts on these European Protected Species, subject to appropriate conditions to protect the retained trees and hedgerows (and to control exterior lighting), which are important bat foraging and commuting routes.

3.5 Breeding birds

Subject to appropriate conditions being attached to any consent to secure the mitigation measures as recommended in the submitted Ecological Appraisal, particularly during construction, I am satisfied that will be no significant adverse impacts on nesting birds.

3.6 Priority habitat - hedgerow

The loss of a section of roadside hedgerow to provide site access will require replacement planting within the development and appropriate ongoing management to ensure ecological functionality for this Priority habitat.



3.7 Priority species

In addition to mitigation during construction, confirmation that all the fencing within the development is hedgehog-friendly as mitigation for loss of connectivity for this Priority species.

I am satisfied therefore that there will be no significant adverse impacts on the Priority Species likely to be present on site, subject to appropriate conditions for clearance and hedgehog friendly fencing throughout the development.

4 Biodiversity enhancements

Biodiversity enhancements should be incorporated into the design of the development in accordance and I am satisfied that the enhancement recommendations set out in the submitted Ecological Appraisal are appropriate and reasonable.

However I would welcome a discussion about an additional enhancement opportunity, to fit integrated bird boxes for swift, a Priority species, into the building design.

5 Recommendations

The mitigation measures identified in the Ecological Appraisal (Mill House Ecology Oct 2015) should be secured and implemented in full. This is necessary to conserve and enhance Protected and Priority Species particularly bats, reptiles, hedgehogs and breeding birds.

I would also expect the preparation of a long term Landscape & Ecological Management Plan (LEMP), prior to 1st occupation. Submission for approval and implementation of these plans in full should be a condition of any planning consent.

I. PRIOR TO COMMENCEMENT: COMPLIANCE WITH ECOLOGICAL APPRASAL RECOMMENDATIONS

"All ecological mitigation measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal (Mill House Ecology, Oct 2015) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

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

II. PRIOR TO COMMENCEMENT: SKYLARK MITIGATION STRATEGY

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

III. PRIOR TO SLAB LEVEL: BIODIVERSITY ENHANCEMENTS

"All ecological measures and/or works shall be carried out in accordance with the details contained in the Ecological Appraisal (Mill House Ecology, Oct 2015), as already submitted with the planning application and agreed in principle with the local planning authority prior to determination"



IV. PRIOR TO OCCUPATION: LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

- a. *"Prior to occupation, a Landscape and Ecological Management Plan (LEMP) for the landscape buffer and habitats on-site shall be submitted to and be approved in writing by the local planning authority. The content of the LEMP, shall include the following:*
- a) Description and evaluation of the features to be managed and enhanced*
 - b) Aims and objectives of management*
 - c) Appropriate management options for achieving aims and objectives*
 - d) Prescriptions for management actions*
 - e) Preparation of a work schedule (including annual work plan capable of being rolled forward over a five year period)*
 - f) Details of the body or organisation responsible for implementation of the plan*
 - g) Ongoing monitoring and remedial measures*
- b. *The LEMP shall also include details of the legal and funding mechanisms by which the long term implementation of the plan will be secured by the developer with the management body responsible for its delivery. The plan shall also set out how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details."*

V. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME

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

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

6. Reasons

6.1 The applicant has provided sufficient information to allow the LPA to discharge its duties under the UK Habitats Regulations.

6.2 The applicant has provided sufficient information to allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended.

6.3 The applicant has provided sufficient information to allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority habitats & species)



7 Conclusion

I agree that the works will result in impacts on important ecological features including Priority hedgerow habitat and could impact on Protected and Priority species. However with mitigation secured, these impacts will be minimised such that the proposal is acceptable subject to the above conditions based on BS42020:2013. In terms of biodiversity net gain, the enhancements proposed will contribute to this aim.

I have made these recommendations in order to minimise the impact of the proposal on ecology and having due regard for the NPPF and Policy CS5, as well as the statutory obligations of the Local Planning Authority.

Please contact me with any queries.

Best wishes

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

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.

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

Tel: 01359 232854

Website: Thurston.suffolk.cloud



From: Greg McSorley
Sent: 23 March 2017 15:00
To: Planning Admin
Subject: Re 4386/16 Land on the west side of Barton Road

Good afternoon,

Thank you for consulting us on this proposal. In my opinion there would be no significant impact on known archaeological sites or areas with archaeological potential. I have no objection to the development and do not believe any archaeological mitigation is required.
Best wishes,

Greg McSorley
Business Support Officer
Suffolk County Council Archaeological Service
Bury Resource Centre
Hollow Road
Bury St Edmunds
Suffolk IP32 7AY
Tel.: 01284 741230
Email: greg.mcsorley@suffolk.gov.uk

Sent: 25 April 2017 16:26

To: Dylan Jones

Subject: RE: Planning applications for 872 houses in Thurston

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

Flood risk

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

Foul water disposal

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

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

Water supply

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

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

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

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

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

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

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

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

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

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

External 02 03 02 58389

Mobile 07845 875238

graham.steel@environment-agency.gov.uk

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

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

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

Iceni House, Cobham Road, Ipswich, IP3 9JD

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 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT / (anglla)

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application 4386/16 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.

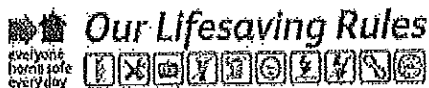
Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied 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
5th Floor
1 Eversholt Street
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E: Wasil.khan@networkrail.co.uk
www.networkrail.co.uk/property



From: planningadmin@midsuffolk.gov.uk [mailto:planningadmin@midsuffolk.gov.uk]
Sent: 06 April 2017 15:20
To: Town Planning SE
Subject: Consultation on Planning Application 4386/16 / Land on the west side of Barton Road, Thurston IP31 3NT / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Land on the west side of Barton Road, Thurston IP31 3NT

Proposal: 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

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, RT12, CL6, H17, HB13, NPPF, CL8, CL5, Cor1, Cor2, Cor5, Cor9, CSFR-FC1, CSFR-FC1.1, CSFR-FC2, H13, H14, H4, H16, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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From: Philippa Stroud
Sent: 10 May 2017 11:08
To: Dylan Jones
Subject: RE: Position statement for Bovis NOISE

WK/193422

Hi Dylan,

Ref: 4386/16/FUL

Location: Land on the west side of Barton Road, Thurston IP31 3NT

Proposal: 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

Thank you for your further consultation.

The pumping station information forwarded by Leslie Short on 8 May is satisfactory and I confirm that I require no further noise assessment in that regard.

The application site is close to a number of existing residential dwellings and for this reason there is a risk of loss of amenity during the construction phase of the development. I would, therefore, recommend that a construction management plan be required by means of condition.

Regards,

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

Telephone: 01449 724724

Email: Philippa.Stroud@baberghmidsuffolk.gov.uk
Websites: www.babergh.gov.uk www.midsuffolk.gov.uk



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0300 123 4000



AMENDED PLANS CONSULTATION

PARISH COUNCIL

Comments from: Thurston Parish Clerk

Planning Officer: Dylan Jones
Application Number: 4386 / 16
Proposal: 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
Location: Land on the west side of Barton Road, Thurston IP31 3NT

Please find below the comments from the Parish Council:

Please be advised that whilst the Parish Council accepts and supports that the new access layout has been amended to achieve a more acceptable visibility splay, it still has overall concerns with this application.
The Parish Council's and Neighbourhood Plan Team's letters of 9th December 2016 and 22nd November 2016 and the comments contained therein should still be considered as valid.

For clarity the Parish Council has previously raised concerns covering the following:

- location within the countryside and outside of built up area boundary
- overdevelopment of site given density being proposed
- siting of 2 storey dwellings along boundaries out-of-keeping with adjacent area
- negative impact on the biodiversity of the area
- negative impact on the countryside
- mix of tenure proposed
- impact on education provision
- impact on current highway infrastructure
- impact on the sustainability of current public transport - please refer to comments from Network Rail.

Signed: Mrs V Waples

Date: 25.05.2017

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



2 June 2017

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

By email only

Hi Dylan

Application: 4386/16

Location: Land on the west side of Barton Road, Thurston IP31 3NT

Proposal: 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

Thank you for consulting Place Services on the above application.

No objection subject to securing biodiversity mitigation and enhancement measures

The revised Ecological Survey report (MHE Consulting, April 2017) now includes information to assess the impacts of development on skylarks and provides sufficient ecological information for determination.

Recommendations

The mitigation measures identified in the ecological report (MHE Consulting, April 2017) should be secured and implemented in full. This is necessary to conserve and enhance Protected and Priority Species particularly bats, reptiles, hedgehogs and breeding birds.

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

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

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



"All ecological mitigation measures and/or works shall be carried out in accordance with the details contained in the Ecological report (M HE Consulting April 2017) as already submitted with the planning application and agreed in principle with the local planning authority prior to determination.

Reason: To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

II. PRIOR TO COMMENCEMENT: SKYARK MITIGATION STRATEGY

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

Reason: To allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended and s40 of the NERC Act 2006 (Priority habitats & species)

III. PRIOR TO OCCUPATION: LIGHTING DESIGN SCHEME

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

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

Please contact me with any queries.

Best wishes.

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

Place Services provide ecological advice on behalf of Babergh and Mid Suffolk District Councils

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

Our Ref: 570/CON/4386/16
Date: 8th June 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

For the Attention of: Dylan Jones

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

Dear Dylan,

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/4386/16

PROPOSAL: to Planning Application 4386/16 for 138 Dwellings off Barton Road Thurston.
Bovis Homes

LOCATION: Barton Road, Thurston, Suffolk

ROAD CLASS: C

This letter is complimentary to that ref 570/CON/4386/16 dated 10th March and 15th 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.

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

Introduction

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

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

Site Access

1. Condition: No other part of the development shall be commenced until the new vehicular access has been laid out and completed in all respects in accordance with Drawing No. THU-P-001 Rev D and with an entrance width of 5.5 meters and been made available for use. Thereafter the access shall be retained in the specified form.

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

2. Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. THU-P-001 Rev D with an X dimension of 2.4m metres and a Y dimension of 59 metres (to the south) and 120 metres (to the north) 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.

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 Layout

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

3. 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.

4. 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.

5. 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.

6. 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.

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

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

Construction Management Plan

8. 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 Drainage

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

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

Comment: Drawing 146/2015/02 shows permeable paving. It is highly unlikely that the Highways Authority would consider adoption of permeable paving into the public highway due to high future maintenance and replacement costs. Nor would the Highway Authority be minded to accept adoption of soakaways or other drainage features that are not within the proposed limits of the public highway. It is recommended that highway drainage details are discussed with the Highways Authority at an early stage of the design process.

Comment: The applicant is reminded that surface and foul drainage systems within roads proposed for adoption by the Highways Authority through Section 38 of the Highways Act (1980) shall be adopted by the relevant statutory undertaker except in exceptional circumstances.

Footway and cycle connectivity (inc Public Rights of Way)

10. Condition: The footway shown as orange squares on plan THU-P-001 Rev D should be metalled using standard materials and drained.

Reason: To provide a pedestrian facility suitable for all year use.

Comment: It is recommended that this footway is included within the S38 adoption process.

11. Condition a metalled footway as shown on Drawing THU-P-001 Rev D of minimum 2.0 metres shall be provided from the site entrance southwards along the site frontage to connect with the existing footway along Barton Road.

Reason: To provide a safe, suitable facility for pedestrian from the development to access the main village and vice versa

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. Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton. A contribution of £47557 is required on commencement of work on site
2. Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a 40mph speed limit on the C692 Thurston Road. A contribution of £8711 is required at the commencement of the first dwelling.
3. Contribution towards extension of the 30mph speed limit on Barton Road west of Mill Lane. A contribution of £8000 is required on commencement of construction work on site.
4. Contribution towards provision of pedestrian crossing facilities at the junction of Norton Road / Station Hill / Ixworth Road. A contribution of £15068 is required on occupation of the first dwelling.
5. Creation of new Public Right of Way along the southern boundary of the site to Heath Road (Cycle route 51). A contribution of £34000 is required on completion of 50% of the total number of dwellings.

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

Travel Plan and S106 Contributions

For a development of this size we will require a travel plan and contributions to be secured by a S106 agreement. The contributions are as follows:

6. Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum until five years have passed after occupation of the final dwelling. 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

7. Travel Plan Implementation Bond - £108,585 (based on SCC calculations on the estimated cost of fully implementing the travel plan for 140 dwellings). This is 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:

- Implementation of the Travel Plan
- 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

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

19/06/2017

For the attention of: Dylan Jones

Ref: 4386/16; Land on the west side of Barton Road, Thurston IP31 3NT

Thank you for consulting us on the planning application for a residential development of 138no. dwellings, new vehicular access and provision of a cycle/pedestrian link to Barton Road. This letter sets out our consultation response on the additional landscape appraisal and strategy documents submitted on the 16/06/17 as a result of our earlier feedback on the document submitted on the 23/03/17.

Review on the submitted information

Relevant to this landscape review, the submitted application relates to Recommendations 2 and 5 in our original response. The application now includes two additional documents; a Landscape Appraisal and a Landscape Strategy, rather than the original one document submitted.

The Landscape appraisal suitably describes the appropriate viewpoints on to the proposed development. It also explores the mitigation measures proposed as part of the boundary treatment and internal green spaces to a good standard.

The Landscape Strategy gives good examples of how the landscape design will be encompassed into the development masterplan. At this stage in the planning process it sufficiently explores the different treatment methods, and the soft and hard landscape materials proposed. However, it is still advised as part of Recommendation 3 and 4 in our response dated 23/03/17 that a detailed landscape and boundary planting plan, landscape maintenance plan and specification are submitted as planning conditions.

Yours sincerely,

Ryan Mills BSc (Hons) LMLI
Landscape Consultant
Telephone: 03330320591
Email: ryan.mills@essex.gov.uk

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

