

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 13 January 2017 15:16
To: Planning Admin
Subject: 4942/16 - Consultation Response

Application ref: 4942/16
Our ref: 205924

Dear Sir/Madam,

Natural England has no comments to make on this application.

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

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

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

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

Yours faithfully,

Jamie Clarkson
Consultations

From: Infrastructure Team (Babergh Mid Suffolk)
Sent: 16 January 2017 14:48
To: Planning Admin
Subject: RE: Consultation on Planning Application 4942/16

This application would be subject to Community Infrastructure Levy (CIL). The residential rate of £115 (subject to indexation) would apply to the Gross Internal Area of the residential buildings. Affordable Housing should be secured by way of a s106 Agreement.

Kind Regards,

Nicola

Infrastructure Team
Babergh and Mid Suffolk District Council – Working Together

Tel: 01449 724563

From: Nathan Pittam
Sent: 17 January 2017 12:01
To: Planning Admin
Subject: 4942/16/FUL. EH - Land Contamination.

M3 : 188881

4942/16/FUL. EH - Land Contamination.
Land at, Meadow Lane, Thurston, BURY ST EDMUNDS, Suffolk.
Residential development consisting of 64 dwellings and associated highway, car parking and public open space.

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that the applicant has not submitted a Geoenvironmental Report outlining the potential risks posed by from previous uses of the site. The applicant has submitted a Geotechnical report by AF Howland Associates but this does not cover what is needed from the perspective of land contamination. Without this information I would be minded to recommend that the application be refused on the grounds of insufficient information.

Regards

Nathan

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@baberghmidsuffolk.gov.uk

From: Iain Farquharson
Sent: 19 January 2017 15:55
To: Planning Admin
Subject: M3 188886: Consultation on Planning Application 4942/16

Dear Sir/Madam

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

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

In addition the Overall Spatial Vision is:

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

Core Strategy Objectives SO 8

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

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

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council



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: 4942/16

Referring to the planning application referenced above, dated 13 January 2016, application for the residential development consisting of 6 dwellings and associated highway, car parking and public open space, Land at Meadow Lane, Thurston IP31 3QG, 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: 23 January 2017
Name: David Abbott	Position: Asset Manager.
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
david.abbott@highwaysengland.co.uk	



The Archaeological Service

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

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

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

Our Ref: 2016_4942
Date: 23 January 2017

For the Attention of Jan Ward

Dear Mr Isbell

Planning Application 4942/16 – Land at Meadow Lane, Thurston: Archaeology

This site lies in an area of archaeological potential recorded on the County Historic Environment Record. The probable remains of a section of Roman road have been identified during archaeological investigations to the west (THS 007). Finds of prehistoric and medieval date have also been recorded in the vicinity (BSE Misc, THS 016, 025 and Misc). As a result, there is potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

Despite the large size of the proposed development area, and lack of previous systematic archaeological investigation, due to the impacts of previous land use, on balance there are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 141), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

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

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

REASON:

To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2012).

INFORMATIVE:

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

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the Conservation Team of SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

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

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

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer
Conservation Team

From: RM Floods Planning
Sent: 23 January 2017 15:06
To: Planning Admin
Subject: 2017-01-23 JS Reply Land at Meadow Lane, Thurston IP31 3QG Ref 4942/16

Suffolk County Council, Flood and Water Management can make the following initial comment for this full application.

The application has conducted some infiltration tests and they have presented area that could be utilised for soakaways which they intend to utilise.

However, more detailed surface water drainage design information needs to be submitted for this full application for us to consider before a view can be given.
 The documents listed below need to be submitted for a full application, and the highlighted in red need to be submitted with the application.

Pre-app	Outline	Full	Reserved Matters	Discharge of Conditions	Document Submitted
✓	✓	✓			Flood Risk Assessment/Statement (Checklist)
	✓	✓			Drainage Strategy/Statement & sketch layout plan (checklist)
	✓				Preliminary layout drawings
	✓				Preliminary "Outline" hydraulic calculations
	✓				Preliminary landscape proposals
	✓				Ground investigation report (for infiltration)
	✓	✓			Evidence of 3 rd party agreement to discharge to their system (in principle/consent to discharge)
		✓		✓	Maintenance program and ongoing maintenance responsibilities
		✓	✓		Detailed development layout
		✓	✓	✓	Detailed flood & drainage design drawings
		✓	✓	✓	Full structural, hydraulic & ground investigations
		✓	✓	✓	Geotechnical factual and interpretive reports, including infiltration test results (BRE365)
		✓	✓	✓	Detailed landscape details
		✓	✓	✓	Discharge agreements (temporary & permanent)
		✓	✓	✓	Development management & construction phasing plan

Kind Regards

Jason Skilton
 Flood & Water Engineer
 Suffolk County Council

Tel: 01473 260411
 Fax: 01473 216864

From: RM PROW Planning
Sent: 25 January 2017 14:00
To: Planning Admin
Cc: Christopher Fish; Claire Dickson
Subject: RE: Consultation on Planning Application 4942/16

Our Ref: W523/001/ROW974/16

For The Attention of: Ian Ward

Public Rights of Way Response

Thank you for your consultation concerning the above application.

This proposal does not directly affect Public Footpath 1, which is recorded nearby, so we have no objections to this proposal.

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 may 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
Green Access Officer
Access Development Team
Rights of Way and Access
Resource Management, Suffolk County Council
Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

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

For great ideas on visiting Suffolk's countryside visit

From: Nathan Pittam
Sent: 27 January 2017 15:40
To: Planning Admin
Subject: 4942/16/FUL. EH - Air Quality Issues.

M3: 188884
4942/16/FUL. EH - Air Quality Issues.
Land at, Meadow Lane, Thurston, BURY ST EDMUNDS, Suffolk.
Residential development consisting of 64 dwellings and associated highway, car parking and public open space.

Many thanks for your request for comments in relation to the above application. Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of air quality.

Regards

Nathan

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@baberghmidsuffolk.gov.uk
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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: 16/4942

Our Ref: NHSE/MIDS/16/4942/KH

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

27 January 2017

Dear Sirs,

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

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

Review of Planning Application

3. There are 2 GP practices within a 2km radius (or closest to/ within catchment) of the proposed development. These practices do not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Impact Assessment

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

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

Table 1: Summary of capacity position for healthcare services within a 2km radius (or closest to/ within catchment) of 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
Woolpit Health Centre	14,134	645.87	9,419	-323.32
Total	26,378	1,414.27	20,625	-394.51

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 at Woolpit Health Centre, servicing the residents of this development, by way of their phase 2 premises extension, 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 extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

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

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

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

Yours faithfully,



Kerry Harding
Estates Advisor

High quality care for all, now and for future generations



SUFFOLK CONSTABULARY

Secured by Design



Phil Kemp
Design Out Crime Officer
Bury St Edmunds Police Station
Suffolk Constabulary
Raynegate Street,
Bury St Edmunds, Suffolk
Tel: 01284 774141
www.suffolk.police.uk

Planning Application (4942/16)

SITE: 64 Dwellings at land on Meadow Lane, Thurston

Applicant: Lawrence Homes

Planning Officer: Mr Philip Isbell

The crime prevention advice is given without the intention of creating a contract. Neither the Home Office nor Police Service accepts any legal responsibility for the advice given. Fire Prevention advice, Fire Safety certificate conditions, Health & Safety Regulations and safe working practices will always take precedence over any crime prevention issue. Recommendations included in this document have been provided specifically for this site and take account of the information available to the Police or supplied by you. Where recommendations have been made for additional security, it is assumed that products are compliant with the appropriate standard and competent installers will carry out the installation as per manufacturer guidelines.

Dear Mr Isbell

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of up to 64 dwellings on land at Meadow Lane, Thurston.

I have viewed the available outline plans and would like to make the following comments on behalf of Suffolk Constabulary with regards to Section 17 of the Crime and Disorder Act.

I have a few concerns regarding the security of the development and have addressed them below. However, should these concerns be addressed, I would approve this design.

I strongly recommend that the development should seek to achieve Secured by Design SBD New Homes 2016 accreditation. Further information can be found at www.securedbydesign.com.

I would further advise the developers seek Secure by Design National Building Approval membership from Secure by Design (SBD). Further details can be found at the following link: <http://www.securedbydesign.com/sbd-national-building-approval/>

A further downloadable document can be obtained using the following link:

<http://www.securedbydesign.com/wp-content/uploads/2015/09/SBDNBA-August-2016.pdf>

My specific observations for this development are that I applaud the developers for not densely siting these properties.

I agree as stated in the Design Access Statement (DAS) gaps between dwellings should be minimised.

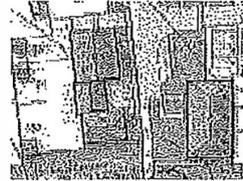
I note from the DAS all current boundary hedging will be retained for rear gardens or side residential plots, however, I have concerns that such hedging will be too permeable for an offender to gain access and would prefer these perimeters, especially the area around plots

NOT PROTECTIVELY MARKED
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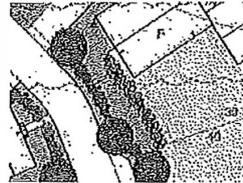
1, 10,11, 20-34, and 51-56 are enclosed by 1.8m close boarded fencing or at least 1.5m boarded fencing, enhanced by further 300cm trellis.

Vulnerable areas, such as exposed side and rear gardens need more robust defensive barriers, by using walls or fencing to a minimum height of 1.8m. Installing fencing to a high standard ensures security and longevity of the boundary. High quality fencing that lasts for a long time will provide security and reduce overall maintenance costs for residents or Landlords. A fence that has a long predicted life is also more sustainable.

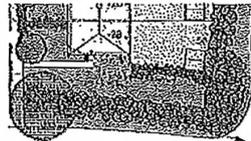
I have concerns at the vulnerability to theft of vehicles parked within the car ports at plots 43-44 and 57-59 (pictured right). I note there will be windows at the front of each property to provide some form of surveillance, but feel that as these areas are vulnerable during the dark hours, that security lighting should be installed to illuminate these areas.



I note by plots 39 and 40 two perimeters have been incorporated into the landscape design (pictured right). If such a proposal remains, this would create a dead space area for an offender to be shielded from view. I recommend that this outer perimeter should instead comprise of either 1metre picket fencing or metal railing to clearly define private from public spacing, but allow surveillance of the area in question.



I note that for plot 56, it has been stated that the current boundary perimeter with Meadow lane will remain (pictured right). Again there is a danger by having such vegetation, if not correctly maintained at a reasonable height of 1m high, this area will become overgrown and another area where an offender is shielded from view. I would therefore prefer low 1m fencing for this area.



I would also like to see 1 metre metal hooped railings or picket fencing around the communal areas.

On a final note I agree with the developers that a lack of shrub layer will facilitate pedestrian movement and allow natural surveillance of the area.

1.0 SECURE BY DESIGN (SBD)

An early input at the design stage is often the best way forward to promote a partnership approach to reducing the opportunity for crime and the fear of crime.

Secured by Design aims to achieve a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

These features include secure vehicle parking, adequate lighting of common areas, control of access to individual and common areas, defensible space and a landscaping and lighting scheme which when combined, enhances natural surveillance and safety.

Experience shows that incorporating security measures during a new build or a refurbishment project reduces crime, fear of crime and disorder.

The role of the Designing Out Crime Officer (DOCO) within Suffolk Police is to assist in the design process to achieve a safe and secure environment for residents and visitors without creating a 'fortress environment'.

2.0 REFERRALS

- 2.11 Section 17 of The Crime and Disorder Act 1998 outlines the responsibilities placed on local authorities to prevent crime and disorder.
- 2.12 The National Planning Policy Framework on planning policies and decisions to create safe and accessible environments, laid out in paragraphs 58 and 69 of the framework, emphasises that developments should create safe and accessible environments where the fear of crime should not undermine local quality of life or community cohesion.
- 2.13 One of the main aims stated in the Babergh and Mid Suffolk Core Strategy Development Plan Document of 2008 (updated in 2012) at Section 1, para 1.19 under Local Development Framework and Community Strategy states:

A safe community: Protect the environment from pollution, flooding and other natural and man-made disasters; reduce the level of crime; discourage re-offending; overcome the fear of crime; and provide a safe and secure environment.

2.2 The Suffolk Design Guide for Residential Areas- Shape of Development – Design Principles (Security)

Landscaping will play an ever increasing role in making the built environment a better place in which to live. Planted areas have, in the past, been created with little thought to how they affect opportunities for crime. Whilst creating no particular problem in the short term, certain types and species of shrubs when mature have formed barriers where natural surveillance is compromised. This not only creates areas where intruders or assailants can lurk, but also allows attacks on vehicles to take place with little or no chance of being seen. Overgrown planting heightens the fear of crime, which often exceeds the actual risk. Planting next to footpaths should be kept low with taller varieties next to walls.

Where footpaths are separate from the highway they should be kept short, direct and well lit. Long dark alleyways should not be created, particularly to the rear of terraced properties. Where such footpaths are unavoidable they should not provide a through route. Changes in the use of materials can also have an influence in deterring the opportunist thief by indicating a semi-public area where residents can exercise some form of control.

Careful design and layout of new development can help to make crime more difficult to commit and increases the risk of detection for potential offenders, but any such security measures must form part of a balanced design approach which addresses the visual quality of the estate as well as its security. Local Planning Authorities may therefore wish to consult their Local Police Architectural Liaison Officer (now referred to as Designing Out Crime Officer) on new estate proposals. Developers should be aware of the benefits obtained from the Secured by Design initiative which can be obtained from the DOCO.

2.3 Department for Transport – Manual for Streets (Crime Prevention)

The layout of a residential area can have a significant impact on crime against property (homes and cars) and pedestrians. Section 17 of the Crime and Disorder Act 1998, requires local authorities to exercise their function with due regard to the likely effect on crime and disorder. To ensure that crime prevention considerations are taken into account in the design of layouts, it is important to consult police architectural liaison officers (Now DOCO's) and crime prevention officers, as advised in *Safer Places*.

To ensure that crime prevention is properly taken into account, it is important that the way in which permeability is provided is given careful consideration. High permeability is conducive to walking and cycling, but can lead to problems of anti-social behaviour if it is only achieved by providing routes that are poorly overlooked, such as rear alleyways.

Safer Places highlights the following principles for reducing the likelihood of crime in residential areas (*Wales*; also refer to Technical Advice Note (TAN) 129):

- the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space';
- access to the rear of dwellings from public spaces, including alleys, should be avoided – a block layout, with gardens in the middle, is a good way of ensuring this;
- cars, cyclists and pedestrians should be kept together if the route is over any significant length – there should be a presumption against routes serving only pedestrians and/or cyclists away from the road unless they are wide, open, short and overlooked;
- routes should lead directly to where people want to go;
- all routes should be necessary, serving a defined function;
- cars are less prone to damage or theft if parked in-curtilage (but see Chapter 8). If cars cannot be parked in-curtilage, they should
- ideally be parked on the street in view of the home.
- Where parking courts are used, they should be small and have natural surveillance;
- layouts should be designed with regard to existing levels of crime in an area; and layouts should provide natural surveillance by ensuring streets are overlooked and well used (Fig. 4.10).

3.0 GENERAL COMMENTS ON PROPOSED PLAN

My specific observations for this development are as follows; (Further details of the following recommendations can be found in the above SDB document "Homes16").

3.1 I agree as stated in the Design Access Statement (DAS) gaps between dwellings should be minimised.

3.2 I note from the DAS all current boundary hedging will be retained for rear gardens or side residential plots, however, I have concerns that such hedging will be too permeable for an offender to gain access and would prefer these perimeters, especially the area around plots 1, 10, 11, 20-34, and 51-56 are enclosed by 1.8m close boarded fencing or at least 1.5m boarded fencing, enhanced by further 300cm trellis.

3.3 Vulnerable areas, such as exposed side and rear gardens need more robust defensive barriers, by using walls or fencing to a minimum height of 1.8m. Installing fencing to a high standard ensures security and longevity of the boundary. High quality fence that lasts for a long time will provide security and reduce overall maintenance costs for residents or Landlords. A fence that has a long predicted life is also more sustainable.

3.4 I have concerns at the vulnerability to theft of vehicles parked within the car ports at plots 43-44 and 57-59 (pictured right). I note there will be windows at the front of each property to provide some form of surveillance, but feel that as these areas are vulnerable during the dark hours, that security lighting should be installed to illuminate these areas.



3.5 I note by plots 39 and 40 two perimeters have been incorporated into the landscape design (Pictured right). If such a proposal remains, this would create a dead space area for an offender to be shielded from view. I recommend that this outer perimeter should instead comprise of either 1metre picket fencing or metal railing to clearly define private from public spacing, but allow surveillance of the area in question.



- 3.6 I would also like to see 1 metre metal hooped railings, or picket fencing around the communal areas.
- 3.7 On a final note I agree with the developers that a lack of shrub layer will facilitate pedestrian movement and allow natural surveillance of the area.
- 3.8 Should any play equipment be installed it should meet **BS EN 1176** standards and be disabled friendly. I would recommend that any such area has suitable floor matting tested to **BS EN1177** standards.
- 3.9 Should gymnasium/fitness equipment be installed, spacing of the equipment and falling space areas should be in line with **BS EN1176**. There is a recommended guideline that static equipment should be at a minimum 2.50 metres distance from each object.
- 3.10 All litter bins should be of a fire retardant material.
- 3.11 Attention should be paid to the sighting and fixing of **Gates, Fences, Seats and Pathways**. Page 17, of SBD New Homes 2016 at Paras 9.1-9.4, under the heading "Communal Areas" refers.
- 3.12 The physical security element of the application should not be overlooked. Doors and windows should be to British Standards (PAS 24) for doors and windows that ensure that the installed items are fit for purpose.
- 3.13 Door chains/limiters fitted to front doors; meeting the Door and Hardware Federation Technical Specification 003 (TS 003) and installed in accordance with the manufacturer's recommendations. (SBD NH 2016 Para. 21.17).

4.0 **CONCLUSION**

- 4.1 I strongly advise the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development and gain SBD National Building approval membership.
- 4.2 As of the 1st June 2016 the police lead Secure By Design (SBD) New Home 2016 was introduced, replacing the previous Secure By Design (SBD) 2014 New Homes guide. This guide aptly meets the requirements of Approved Document Q for new builds and renovation work to a preferred security specification, through the use of certified fabricators that meet Secure By Design principals, for external doors, windows and roof lights to the following standards
[http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured by Design Homes 2016 V1.pdf](http://www.securedbydesign.com/wp-content/uploads/2016/03/Secured_by_Design_Homes_2016_V1.pdf)
- 4.3 SBD New Homes 2016 incorporates three standards available within the New Homes 2016 guide, namely Gold, Silver or Bronze standards. It is advisable that all new developments of 10 properties or more should seek at least a Bronze Secured by Design. Further details can be obtained through the Secure By Design (SBD) site at <http://www.securedbydesign.com/>
- 4.4 To achieve a Silver standard, or part 2 Secured by Design physical security, which is the police approved minimum security standard and also achieves ADQ, involves the following:
- a. All exterior doors to have been certificated by an approved certification body to BS PAS 24:2012, or STS 201 issue 4:2012, or STS 202 BR2, or LPS 1175 SR 2, or LPS 2081 SRB.
 - b. All individual front entrance doors to have been certificated by an approved certification body to BS Pas 24:2012 (internal specification).

- c. Ground level exterior windows to have been certificated by an approved certification body to BS Pas 24:2012, or STS204 issue 3:2012, or LPS1175 issue 7:2010 Security Rating 1, or LPS2081 Issue 1:2014. All glazing in the exterior doors, and ground floor (easily accessible) windows next to or within 400mm of external doors to include laminated glass as one of the panes of glass. Windows installed within SBD developments must be certified by one of the UKAS accredited certification bodies.

The Police nationally promote Secured by Design (SBD) principles, aimed at achieving a good overall standard of security for buildings and the immediate environment. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of the development.

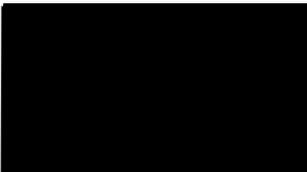
5.0 FINAL CONCLUSION

Should the concerns I have raised be addressed, I would approve this proposed design.

I hope the planners will adopt Secure By Design standards and apply for Secure by Design National Building Approval membership.

If the planners wish to discuss anything further or need assistance with the SBD application; please contact me on 01284 774141.

Yours sincerely



Phil Kemp

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30th January 2017

Dear Cllr. Robinson,

4942/16 – Application for residential development consisting of 64 dwellings and associated highway, car parking and public open space @ land at Meadow Lane

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

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

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

A copy of all site assessment work can be seen within Thurston's Village website:
<http://thurston.suffolk.cloud/neighbourhood-plan/site-assessment-of-sites-for-development/>

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

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

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

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

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

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

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

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

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

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

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

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

In addition, given capacity and legislative issues

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

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

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

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

- **Housing**

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

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

Site	Land west of Ixworth Road 4963/16	Land at Norton Road 5070/16	Land at Meadow Lane 4942/16	Land south of Norton Rd 2797/16 5010/16	Land west of Barton Rd 4386/16	Land west of Ixworth Road 4963/16	Land at Norton Road 5070/16	Land at Meadow Lane 4942/16	Land south of Norton Rd 2797/16 5010/16	Land west of Barton Rd 4386/16	Land west of Ixworth Road 4963/16	Land at Meadow Lane 4942/16
Bedrooms	Market Housing					Affordable Housing					Intermediate/shared equity	
1		5									24	appts
2		4 terraced 12 bungalows	6		4 bungalows		9 bungalows 5 appts				16	houses
3		25 semis 26 detached	13		3 bungalows 22 houses		3 bungalows 6 appts 12 terraced				6	houses
4		31 detached	17		46 houses		31 semis 5 detached				2	houses
5		18 detached	6		13 houses 2 4/5 houses							
Self-build		9										
Sub Total	163	130	42	114	90	65	70	16	61	48	22	6
Total	539					260					28	
Final total 827 dwellings												

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

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

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

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

Ipswich Housing Market Area, Strategic Housing Market Assessment (SHMA) Document and 2014 Suffolk Housing Needs Survey all show that there is a high demand for smaller homes across all tenures from those who maybe starting households to those who may be looking to downsize. The Enabling Housing Officer at Mid Suffolk in her response to Planning Application 4386/16 makes reference to the fact that affordability issues are the key driver for the increase in smaller homes and that there is a strong demand for one and two bedroom flats/apartments and houses.

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

- Transport

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

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

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

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

will be heightened the more footfall there is at the station. The Team is concerned that there are no plans to see improvements made to this station at a time when Network Rail are closing rural footpaths that cross rail tracks due to the dangers posed, and yet this dangerous crossing, which has to be used every day by many including schoolchildren, is deemed to be safe.

The Neighbourhood Plan Team is concerned that, having viewed the documents still available on Mid-Suffolk's District Planning site for the development at the Granary, no Transport Assessment can be found, although a commercial centre will involve delivery vehicles as well as visits from customers, besides the trips made by the cars and vans used by residents of the proposed 100 or so flats. The more recent planning applications from agents acting on behalf of Bovis Homes, Hopkins Homes, Persimmon Homes and Pigeon Capital Management 2 Ltd include lengthy Travel Assessments. All state that they have examined the traffic flow at various key junctions in Thurston at AM and PM peak times and supply all their data and name the computer programs they have used to calculate capacity and degrees of congestion. It is noted that the Laurence Homes application for 64 homes is apparently a borderline size which may not need an assessment.

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

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

Bovis Homes		Barton (New) Rd/ Mount Rd	D	B	7 Slight 1 Serious	F	B
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Using the data provided in the various individual assessments which were undertaken on different dates, the two roads and most of the junctions were recorded in AM and PM as "A" which means Free Flow. "B" is Reasonably Unimpeded. "C" is Stable, "D" is Lightly Congested. "E" is Significantly Congested and "F" is Heavily Congested. The after-development estimates were taken to be in 2021 except Bovis Homes who used 2023. Where different arms of a junction had different levels of flow, the highest was recorded above. It is noted that these records show only a slight increase in congestion after the development has gone ahead. However none of these estimates of future traffic took the other proposed developments into consideration only "background growth" and again the Neighbourhood Plan Team is concerned at the cumulative impact all of the developments would have on the current infrastructure.

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

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

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

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

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

- Social Challenges

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

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

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

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

As stated previously whilst the Neighbourhood Plan has not yet reached the stage of allocating sites or proposing policies, it has followed a period of extensive consultation with the public and land owners and agents on the site assessments carried out during Summer - Autumn 2016 following the Neighbourhood Plan Team's Call for Sites of January 2016, under the Parish Housing Land Availability Assessment. Throughout this process of consultation, several issues have arisen which the Neighbourhood Plan Team feel are so major and fundamental as to override any acknowledgment of this site's "slightly positive" assessment.

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

- The site on Norton Road has only one vehicular entrance to potentially 64 dwellings with a footpath to Meadow Lane.

- road safety with emphasis on the junctions of Norton Road and Ixworth Road which is very close to the Community College at the AM and PM peak times.
- road safety issues with emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pokeridge Corner
- pedestrian safety along Norton Road for accessing village facilities as there are no safe crossing points
- impact of the vehicular movements from a single point of entry onto Norton Road. It is also on the same side and near to the entrance to Rylands Close with also generates traffic
- development inappropriate to that of land abutting the countryside
- impact on village infrastructure particularly education and health provision
- type and density of housing mix not in accordance with the Neighbourhood Plan findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people.
- cost of affordable homes for local residents – the application fails to take into account the District Wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

In summary, whilst the Neighbourhood Plan Team recognises the need for future development to take place within Thurston and is aware that the size of development coming forth under this application is more in keeping with the Community's preference to see growth limited to plots of no more than 50 dwellings, it does not support the application in its present guise for the concerns outlined above.

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

Yours faithfully,

Victoria S Waples

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



Your ref: 4942/16
Our ref: 00044352
Date: 07 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Ian,

Re: Thurston, Land at Meadow Lane – 64 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

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG

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



SENT AS AN E-MAIL

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

February 10th 2017

Dear Mr. Isbell,

Proposal: Planning Application 4942-16 – application for residential development consisting of 64 dwellings and associated highway, car parking and public open space @ land at Meadow Lane

Case Officer: Ian Ward

The Parish Council wishes to place on record that it objects to this proposal in its current guise and that the proposal is considered not to form a sustainable development within the dimensions set out in the NPPF, risks harm to biodiversity and fails to address adequately the economic and social benefits. Furthermore, the Parish Council feels that given the size of the development being proposed, the likely CIL yield for the provision of additional educational facilities and medical facilities will not be able to offset the cumulative effects of this proposal and as such will overburden existing infrastructure.

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

The site and surrounding area are within the countryside and therefore outside 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. Whilst it is acknowledged that part of the development abuts the settlement boundary of Thurston, it is felt that development of the site to the North of Norton Road would neither protect nor enhance the character of the village which is currently rural and would therefore not only be contrary to GP1 – Design and Layout of Development but also be contrary to csfr-fc2 provision and distribution of housing and cor2 development in the countryside and countryside villages. The Parish Council further feels that the application submitted will harm the character and appearance of this open area and will be contrary to Policy CS5 of the Core Strategy, Policy FC1.1 of the Core Strategy of the Mid Suffolk Core Strategy Focus

Review (2012) and saved Policies H13 and H16 of the Mid Suffolk Local Plan. Furthermore, it is felt that the development fails to ensure that it reflects the local character and identity of the area immediately surrounding the proposed development and is therefore inconsistent with paragraph 58 of the NPPF and that the application, if approved, will fail to consider the loss of public viewpoints from this site, will fail to protect the quiet recreational enjoyment enjoyed by those accessing Meadow Lane and will fail to protect the wildlife habitats at this point in the village and will therefore be contrary to policies H16 – protecting existing residential amenity CL8 – protecting Wildlife Habitats.

The Parish Council feels that the application fails to consider policy cor9 (cs9 density and mix) and fails to demonstrate that it has achieved a mix of house types, sizes and affordability to cater for accommodation needs. Whilst it is acknowledged that Policy CS9 recognises that housing sites may range from town to village, all applications for housing should be expected to respect the traditional form of development rather than follow a standardised suburban form of development. The Parish Council is concerned that the application submitted fails to show that it has considered the current mix of housing within the village of Thurston and that it fails to have taken account of the findings of tenure type and mix within the Neighbourhood Plan consultations, nor the findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people. The Parish Council is also concerned that the application fails to take significant regard for the District wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

The Parish Council also supports the comments made by Suffolk Constabulary Design Out Officer with regards to landscaping and hedging and has concerns that the proposed boundary hedging, unless kept under control, may well form barriers where passive natural surveillance may not be possible and/or may be permeable for an offender to gain access to properties. There is also concern that such hedging may well impede on the highway along Norton Road and Meadow Lane. Furthermore, the Parish Council is concerned that the application fails to take into account the Department of Transport's Manual for Streets which expects planning applications to follow the general principles for reducing the likelihood of crime in residential areas and that "the desire for connectivity should not compromise the ability of householders to exert ownership over private or communal 'defensible space' and that 'access to the rear of dwellings from public spaces, including alleys, should be avoided and layouts should be designed with regard to existing levels of crime in an area'

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 Primary School and Secondary School 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).

The Parish Council also finds that the development fails to demonstrate that it has considered safe and suitable access points for all people and as such is contrary to paragraph 32 of the NPPF. As the development fails to give priority to pedestrian and cycle movements and given the location of the site, it would not support the transition to a low carbon future and is therefore unable to meet the environmental dimension of sustainable development and would be contrary to paragraph 17, 30, 35 and 55 of the NPPF and Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review.

Furthermore, the Parish Council is concerned at the impact of the location of an entrance very close to that of Rylands Close and the junction of Sandpit Lane. The increased traffic that this development will produce if the tenure and mix of housing is approved as submitted, will have a detrimental impact on Norton Road and it is felt that insufficient detail has been given to ensure that, with reference to NPPF paragraph 32 'safe and suitable access can be achieved for all people.' It is also acknowledged that Suffolk County Council in its response to Planning Application 2797/16 recommended refusal for an exit onto Norton Road as the proposal 'could not be considered to be safe for all'.

The Parish Council also feels that that assessment holds true for this application and would ask that Highways be asked to comment further on the siting of an additional entrance onto Norton Road serving plots 1 – 4 – in addition to the one serving the main area. The Parish Council is concerned that this entrance does not follow the Suffolk Design Code for Residential Areas which states that from the point of safety and the need to consider access in emergencies, not more than 150 dwellings will normally be served by a single means of access. The Parish Council is further concerned that, by inserting 2 entrances onto Norton Road within close proximity of one another, the application fails to consider the layout of Norton Road and its proximity to the junctions of Norton Road/Sandpit Lane and Norton Road/Ixworth Road, does not take into account the expected volumes and speeds of vehicular traffic along Norton Road and fails to show that it has considered the dangers associated with vehicular and pedestrian movements at such junctions.

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 the village which will also be contrary to the sustainability objectives of Policies FC1 and FC1.1 of the Mid Suffolk Core Strategy Focused Review (2012) and the NPPF paragraphs 14, 17, 55 and 56 and will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway bridge crossings on Barton Road, the Priority System on Thedwastre Road and entry and exit points onto the A14.

The Parish Council is aware that, until the Order for the Neighbourhood Plan is laid, it is expected to respond to current planning applications in line with policies set out in the Mid Suffolk Local Plan. It is recognised and understood that, as defined by Mid Suffolk's Local Plan, Thurston is a Key Service Centre and growth is assumed to be in line with current policy. Policies cor1 (cs1 settlement hierarchy) and cor2 (CS2 development in the countryside and countryside villages) have been considered in the Council's response to this application.

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

The Neighbourhood Plan Team reports to the Parish Council on a regular basis and all Parish Councillors are fully aware and in agreement with the views of the Neighbourhood Plan Team, some of whom are indeed both Parish Councillors and Neighbourhood Plan members. The Parish Council has received correspondence from the Neighbourhood Plan

Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that they are to be included within its submission.

It is known that that letter was submitted to the Planning Department at Mid Suffolk on 3rd February and its contents should be taken as being fully endorsed by the Parish Council.

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

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

As confirmation, the Parish Council is unable to support, in its current form, the application that has been submitted for this site.

Yours sincerely,

Victoria S Waples

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





Consultation Response Pro forma

1	Application Number	4942/16 Meadow Lane, Thurston	
2	Date of Response	17.2.17	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<p>1. The Heritage Team considers that the proposal would cause</p> <ul style="list-style-type: none"> • no harm to a designated heritage asset because it would not result in material harm to the setting of heritage assets. 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.	<p>Except on its east side, the site is surrounded by modern development of residential and commercial character. To the east lies open agricultural land, and to the east of that is land associated with the grade II* listed Manor farmhouse and grade II listed barn, formerly Manor Farm.</p> <p>These listed buildings stand surrounded by farmland. The isolated rural location and close historic association with the farmland make a considerable and essential contribution to understanding and appreciating their significance. Given the context of existing development around the application site, it is considered that built development on this site would not materially encroach on the settings of the listed buildings and would not be considered harmful.</p>	
6	Amendments, Clarification or Additional Information Required (if holding objection) If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate		
7	Recommended conditions		

Please note that this form can be submitted electronically on the 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.

Your ref: 4942/16
Our ref: Thurston – land at Meadow
Lane 00044352
Date: 18 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Ian,

Thurston: land at Meadow Lane – developer contributions

I refer to the planning application for residential development consisting of 64 dwellings and associated highway, car parking and public 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 £13,824 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 64 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	95%	Temporary	Total	2016/17	2017/18	2018/19	2019/20	2020/21
Thurston CE Academy	210	200		200	196	211	212	208	203
		0		0					
Ixworth Free School (11 - 16)	597	567	0	567	271	300	342	360	344
Thurston Community College (11 - 16)	1500	1426	0	1,426	1,581	1,599	1,585	1,647	1,547
11-16 total places	2097	1992		1992	1,832	1,899	1,927	1,997	1,891
Thurston Community College (with Sixth Form)	1940	1,843	0	1,843	1,828	1,849	1,862	1,872	1,888

School level	Minimum pupil yield	Required
Primary school age range, 5-11:	15	15
High school age range, 11-16:	11	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
- £6.9m/420places = £16,429 per pupil place
- From 64 dwellings it is forecast that 15 primary age pupils will arise
- Therefore 15 pupils x £16,429 per place = **£246,435 (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 15 places x £1,294 per place = **£19,410.**

At present two planning applications (under references 5070/16 and 4963/16) include land identified for education use but planning permission for neither site has been granted permission by Mid Suffolk District Council. It is therefore suggested that consideration be given to imposing an appropriate planning condition restricting occupation of any dwellings once the capacity of the

existing primary school with additional temporary classroom are full. This condition can be discharged once construction of the new primary school has commenced. This recognises the importance that the Government attaches to education provision as set out in paragraphs 38 and 72 of the NPPF.

Temporary classroom costs

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

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

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

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

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

response was to accept in principle the installation of the temporary classroom if it was needed, providing there was evidence that the new school would be built and open in the early stages of the housing developments to minimise the length of time the temporary building would remain on site. Formal acceptance in writing from the school has now been received.

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

The proportionate temporary accommodation contribution is calculated as follows:

- Cost of a temporary accommodation £250,000
- Cost per place = £250,000/60 = £4,167
- Primary age pupils arising from this site is 15
- Proportionate contribution towards temporary classroom is 15 pupils x £4,167 per place = £62,505

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 64 dwellings, the County Council anticipates around 6 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 6 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 64 dwellings there is the need for 6 additional places
- Therefore 6 pupils x £8,333 per place = **£49,998 (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:

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www.suffolk.gov.uk

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
 - b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
 - c. Local neighbourhoods are, and feel like, safe, interesting places to play.
 - d. Routes to children's play spaces are safe and accessible for all children and young people.
4. **Transport issues.** The NPPF at Section 4 promotes sustainable transport. A comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This is being coordinated by Steve Merry/Christopher Fish of Suffolk County Highway Network Management.

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

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

On 18 December 2014 the secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10

dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that in considering:

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

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

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

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

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

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

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

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

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

I consider that the contributions requested are justified and satisfy the requirements
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www.suffolk.gov.uk

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



Ian Ward
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

21/02/2017

Dear Ian,

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

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

We have read the ecological survey report (Hillier Ecology Limited, October 2016) and we note the findings of the consultant.

The site is bounded by hedgerows, whilst we note that they are not considered by the ecological consultant to meet the 'Important' Hedgerows Criteria (Hedgerow Regulations (1997)), they are a UK and Suffolk Priority habitat and offer nesting habitat for bird species and foraging and commuting habitat for bat species. From the Design and Access Statement it is unclear whether it is intended for the hedgerow bounding Meadow Lane is to be incorporated into the gardens of the proposed properties? This could result in unsympathetic management of these features and the reduction in their ecological value. We therefore request that either they are kept outside of the domestic curtilages or that a mechanism is found to enable their ecological value to be maintained.

We also note that the hedgerow bordering Norton Road is to be removed. It is unclear whether compensation planting is proposed. In the absence of compensation measures this would be a loss of a UK and Suffolk Priority habitat, contrary to the requirements of the National Planning Policy Framework (NPPF) and Mid Suffolk DC's adopted Core Strategy document. We would therefore recommend that any development retains this hedgerow as it is relatively species-rich and provides potential foraging/commuting habitat for bats. We also recommend the planting of native species of local provenance to infill gaps in the hedgerows.

Although no skylarks were recorded on the site at the time of the ecological survey, this was carried out late in the season for this species. Although this is a relatively small site, there is some potential for skylark nesting and it is likely to provide part of the wider resource for skylark alongside neighbouring arable land. Skylark are a UK and Suffolk Priority species and are on the 'Red' list of Birds of Conservation Concern (BoCC) due to population declines. Compensation for the loss of suitable nesting habitat for this species must therefore be sought as part of this proposal, in combination with other potential losses from proposed developments on neighbouring sites. We would recommend that this is in the form of skylark plots (meeting the specification set out in Countryside Stewardship option AB4) on nearby arable land, these should be secured for a minimum of 10 years.

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guarantee no 095346
Registered charity no 202777

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

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

Development at this site provides a good opportunity to include significant ecological enhancements, appropriate to the area. This should include the addition of bat boxes and integrated bird boxes, including swift boxes and sparrow terraces to the buildings, and ensuring that all greenspaces are managed to maximise their biodiversity value in the long term.

We request that the recommendations made within the report are implemented in full, via a condition of planning consent, should permission be granted.

Please do not hesitate to contact us should you require anything further.

Yours sincerely

Jill Crighton
Conservation Planner



Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00019797
Local Planning Authority: Mid Suffolk District
Site: Land at Meadow Lane, Thurston
Proposal: Residential development consisting of 64 dwellings and associated highway, car parking and public open place
Planning Application: 4942/16

Prepared by: Sandra Olim

Date: 27 February 2017

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

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. A drainage strategy will need to be prepared in consultation with Anglian Water to propose a foul pumped rate determine mitigation measures if required.

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

Section 4 – Surface Water Disposal

- 4.1 The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option.

Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

- 4.2 The surface water strategy/flood risk assessment submitted with the planning application relevant to Anglian Water is unacceptable. We would therefore recommend that the applicant needs to consult with Anglian Water and the Lead Local Flood Authority (LLFA).

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

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.

Surface Water Disposal (Section 4)

CONDITION

No drainage works shall commence until a surface water management strategy has been submitted to and approved in writing by the Local Planning Authority. No hard-standing areas to be constructed until the works have been carried out in accordance with the surface water strategy so approved unless otherwise agreed in writing by the Local Planning Authority.

REASON

To prevent environmental and amenity problems arising from flooding.

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



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

28/02/2017

For the attention of: Ian Ward

Ref: 4942/16; Land at Meadow Lane, Thurston IP31 3QG

Thank you for consulting us on the submitted planning application for a residential development consisting of 64no. dwellings and associated highway, car parking and public open space

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

Recommendations

In terms of the likely visual effect on the surrounding landscape, the proposal will inevitably have an impact, but this impact is limited to the eastern countryside edge and southern boundary of the site where the proposal fronts onto the surrounding site boundary along Norton Road and Meadow Lane.

The character of the site will change significantly as part of this proposal; the proposed landscape mitigations should seek to both provide suitable screening and appropriate landscaping to suitably reduce the impact of the development.

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

- 1) The eastern site boundary should be designed to reinforce and respond to the existing tree and hedge planting. When produced, the detailed landscape proposals should include additional planting to help reinforce the retained hedgerows within the site, using the appropriate indigenous species,
- 2) A Landscape Impact Appraisal or Assessment should be produced to demonstrate how the visual impact of the development can be mitigated through a suitable structured landscape plan,
- 3) Details of the proposed landscaping between the existing residential areas (to the north-east corner of the site) and the proposed development should be provided to reinforce the boundary edge of the site, while reducing the local visual impact of the proposals,
- 4) The Meadow Lane frontage of the layout should be rearranged to overlook/front onto Meadow Lane and the adjacent countryside, to create opportunities for passive surveillance and a more appropriate development edge to the rural facing edge of the site,



- 5) A detailed landscape planting plan, landscape maintenance plan and specification, (which clearly sets out the existing and proposed planting), will need to be submitted as part of a planning condition, if the application is approved. We recommend a landscape maintenance plan for the minimum of 3 years, (ideally 5 years) to support plant establishment,
- 6) A detailed boundary treatment plan and specification will need to be submitted as part of a planning condition, if the application is approved.

Review on the submitted information

The submitted planning application includes a strategic landscape plan, layout plan and design and access statement. The submitted strategic landscape plan highlights the broader landscape objectives but fails to include any tangible proposals which seek to mitigate the wider impact the development will have on the site and surrounding landscape.

The application does not include any Landscape Visual Impact Assessment or explore the visual impact the development will have on short, medium and long range views towards the site. The analysis within the design and access statement only includes short range views within and around the site.

Proposed mitigation

The setback frontage along Norton Road is a result of the 3m sewer easement rather than a considered design feature to create a landscape buffer along Norton Road. The combination of the 3m easement and the junction visibility splay combine to create what will be a harsh, landscape deficient street frontage, as demonstrated by the image on the front of the Design and Access Statement. Space needs to be provided for additional boundary planting to help screen the flank elevations and garden boundary fences.

The Meadow Lane frontage should be rearranged to overlook/front onto Meadow Lane and the adjacent countryside, to create opportunities for passive surveillance and a more appropriate development edge to the rural facing edge of the site.

Screening landscaping should be added to the boundary with the existing dwelling to the north-eastern corner of the site, to help reduce the impact of the development. All boundary and perimeter landscape should include locally indigenous plant species.

The proposed strategic landscaping plan needs to provide a comprehensive landscape vision for the site, which is evidenced by a landscape impact appraisal or landscape visual impact assessment, highlighting how the proposals can respond to the surrounding landscape.

Views into the site from the east are significant, even where existing hedgerows line the site and adjacent field boundary. There are opportunities to mitigate this by strengthening and reinforcing the eastern site boundary with new tree and hedge planting especially where there are gaps. This should be demonstrated through the detail landscape planting plan.

Yours sincerely,

Peter Dawson BA(hons) DipLA
Principal Consultant Landscape Architect
Telephone: 03330136861
Email: peter.dawson@essex.gov.uk

N.B. This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to the particular matter.



Your ref: 4942/16
Our ref: Thurston – land at Meadow Lane
000044352
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 at Meadow Lane

I refer to the planning application for residential development consisting of 64 dwellings and associated highway, car parking and public open space.

The County Council responded by way of letter dated 18 February 2017 which is still relevant. However this letter provides an update on two issues, namely:

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

Yours sincerely,



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

From: David Pizzey
Sent: 14 March 2017 09:54
To: Dylan Jones
Subject: Meadow Lane, Thurston.

From: David Pizzey
Sent: 18 January 2017 10:12
To: Ian Ward
Cc: 'planningadmin@midsuffolk.gov.uk'
Subject: 4942/16 Land at Meadow Lane, Thurston.

Ian

I have no objection in principle to this application as there seems few, if any, significant trees affected by the proposal. However, an arboricultural report will be required in order to identify impact of the design and protection measures necessary. The existing boundary hedgerows will be important to help soften and incorporate any development with the local landscape.

Regards

David

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

David Pizzey
Arboricultural Officer
Hadleigh office: 01473 826662

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



21 February 2017

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

By email only

Dear Dylan

Application: 4942/16

Location: Land at Meadow Lane, Thurston IP31 3QG

Proposal: Residential development consisting of 64 dwellings and associated highway, car parking and public open space

Thank you for consulting Place Services on the above application.

Holding objection: There is insufficient ecological information available to understand the likely impacts of development on Priority Habitats eg hedgerows and Priority species.

Although the Ecological Scoping Survey report (Hillier Ecology Oct 2016) provides sufficient ecological information to understand the impacts of development on Protected species, it fails to assess Priority habitats eg hedgerows and Priority species eg hedgehogs, farmland birds.

There is therefore a gap in information which needs to be filled before determination of this application. This additional information is necessary to confirm the likely impacts on hedgerows and priority species, together with any necessary mitigation measures having been secured.

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

Best wishes

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

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

BABERGH/MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Chief Planning Control Officer For the attention of: Planning admin
FROM: Nathan Pittam, Environmental Protection Team DATE: 16/3/17
YOUR REF: 4942/16. EH - Land Contamination.
SUBJECT: Residential development consisting of 64 dwellings and associated highway, car parking and public open space
Address: Land at, Meadow Lane, Thurston, BURY ST EDMUNDS, Suffolk.

Please find below my comments regarding contaminated land matters only.

The Environmental Protection Team has no objection to the proposed development, but would recommend that the following Planning Condition be attached to any planning permission:

Proposed Condition: Standard Contaminated Land Condition (CL01)

No development shall take place until:

- 1. A strategy for investigating any contamination present on site (including ground gases, where appropriate) has been submitted for approval by the Local Planning Authority.*
- 2. Following approval of the strategy, an investigation shall be carried out in accordance with the strategy.*
- 3. A written report shall be submitted detailing the findings of the investigation referred to in (2) above, and an assessment of the risk posed to receptors by the contamination (including ground gases, where appropriate) for approval by the Local Planning Authority. Subject to the risk assessment, the report shall include a Remediation Scheme as required.*
- 4. Any remediation work shall be carried out in accordance with the approved Remediation Scheme.*
- 5. Following remediation, evidence shall be provided to the Local Planning Authority verifying that remediation has been carried out in accordance with the approved Remediation Scheme.*

Reason: To identify the extent and mitigate risk to the public, the wider environment and buildings arising from land contamination.

It is important that the following advisory comments are included in any notes accompanying the Decision Notice:

"There is a suspicion that the site may be contaminated or affected by ground gases. You should be aware that the responsibility for the safe development and secure occupancy of the site rests with the developer.

Unless agreed with the Local Planning Authority, you must not carry out any development work (including demolition or site preparation) until the requirements of the condition have been met, or without the prior approval of the Local Planning Authority.

The developer shall ensure that any reports relating to site investigations and subsequent remediation strategies shall be forwarded for comment to the following bodies:

- *Local Planning Authority*
- *Environmental Services*
- *Building Inspector*
- *Environment Agency*

Any site investigations and remediation strategies in respect of site contamination (including ground gases, where appropriate) shall be carried out in accordance with current approved standards and codes of practice.

The applicant/developer is advised, in connection with the above condition(s) requiring the submission of a strategy to establish the presence of land contaminants and any necessary investigation and remediation measures, to contact the Council's Environmental Protection Team."

Nathan Pittam
Senior Environmental Management Officer

From: Thurston Parish Council [<mailto:info@thurstonparishcouncil.gov.uk>]
Sent: 17 March 2017 10:10
To: Planning Admin; Philip 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.

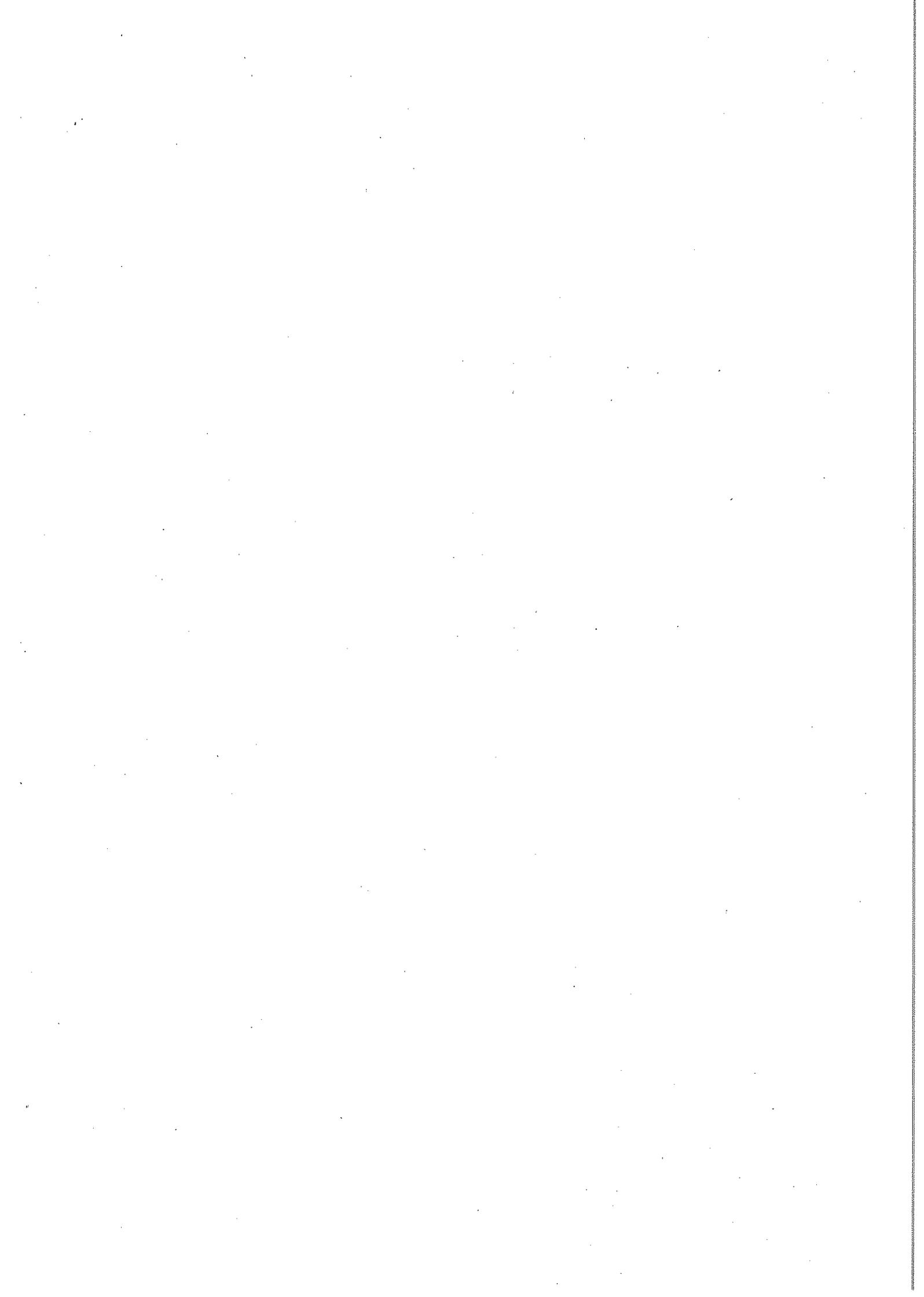
Kind regards

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: Landscape [<mailto:Landscape@essex.gov.uk>]
Sent: 17 March 2017 13:02
To: Andrew Hastings
Cc: Dylan Jones
Subject: Meadow Lane.Thurston

Andy hi,

Thank you for your time today to meet onsite to discuss the landscape elements of this application. In so far as a summary of our discussion and the agreed actions, the following points should be addressed within the revised landscape submission:

1. Provide some analysis and mitigation proposals of the medium to long views looking towards the eastern boundary of the site. The viewpoints should include Norton Road and any PROW along this boundary edge of the site. (A plan with viewpoints/directions and photograph key would be sufficient.) You need to demonstrate a correlation between impact and mitigation- which may include some additional tree planting to soften the development edge.
2. Areas along the eastern boundary which include gaps, brambles and the access gate should be shown to include new replacement hedges, including the appropriate specification/species.
3. I welcome the suggested changes to the built frontage line along the southern boundary- to create space for appropriate hedge planting, beyond the easement. Attention needs to be given to the quality of the boundary treatment in this location. Due to the prominence of this boundary, walls would be my preference to panel fencing.
4. The landscape plan to include buffer planting between the existing properties in the north eastern corner of the site.
5. Happy to review the detailed landscape layout as a planning condition.

Kind regards,

Peter Dawson
Principal Urban Design and Landscape Consultant at Place Services

telephone: 03330136861 | mobile: 07748623787
web: www.placeservices.co.uk
linkedin: www.linkedin.com/in/peter-dawson



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Our Ref: 570/CON/4942/16
Date: 3rd April 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

NAME Mr Ian Baker
ADDRESS Laurence Homes
14 Ruskin Close
Stowmarket
Suffolk
IP14 1TY

Dear Mr Baker

Interim Reply to Planning Application 4942/16 for Residential development consisting of 64 dwellings and associated highway, car parking and public open space

This letter is complimentary to that ref 570/CON/4942/16 dated 10th March 2017, which details Suffolk County Council's response to the cumulative effect that five developments in the parish of Thurston will have on the highway infrastructure. This letter details the additional issues that the Highways Authority has identified specific to this application.

Site Access

Visibility splays of 4.5m x 60m are proposed and the access is within of the 30mph speed limit. This would be acceptable.

No swept path analysis has been provided for the entrance or within site. This will be required to show that the junction design is acceptable.

Highway Drainage

The applicant's attention is drawn to the issue of potential adoption and future maintenance of the highway drainage system. SCC are reluctant to adopt permeable paving, lagoons and most Suds systems. Early discussion with SCC Development Management officers is recommended.

Footway and cycle connectivity (inc Public Rights of Way)

The footway link to Meadow Lane should allow use by cycles in addition to pedestrians.

Internal Highway Layout

The 5.5m width carriageway and 2m wide verges would be acceptable for the principal access road. Details of the shared surfaces has not been supplied.

Car Parking

In the Design and Access Statement it is proposed that on-site parking and sizes of garages will comply with the current SCC guidance.

Landscaping

On the plans supplied it is noted that trees are shown in indicative positions. These are close to and overhanging the highway. Planting of vegetation that will or may in the future overhang the road should be restricted. Before the Highway Authority would consider a layout for an adopted road the applicant will need to agree details of such planting including how these would facilitate adequate street lighting and the risk of root damage mitigated.

Proposed S278 works

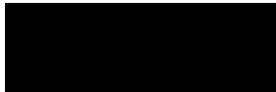
- Pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road (uncontrolled)
- Improvements to surface of Meadow Lane to promote cycle / pedestrian facilities (and maintain access to properties)

Proposed S106 Heads of Terms

- Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton
- Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road
- Contribution towards 40mph speed limit on the C692 Thurston Road as part of the above safety improvements
- Contribution towards provision of pedestrian crossing facilities at the junction of Norton Road / Station Hill / Ixworth Road.

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

Yours sincerely



Steve Merry
Transport Policy and Development Manger
Resource Management

Sent: 25 April 2017 16:26

To: Dylan Jones

Subject: RE: Planning applications for 872 houses in Thurston

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

Flood risk

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

Foul water disposal

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

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

Water supply

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

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

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

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

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

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

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

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

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

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

External 02 03 02 58389

Mobile 07845 875238

graham.steel@environment-agency.gov.uk

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

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

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

Iceni House, Cobham Road, Ipswich, IP3 9JD

MID SUFFOLK DISTRICT COUNCIL

TO: Ian Ward – Senior Planning Officer

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

Date: 30 January 2017

SUBJECT: Residential Development at Meadow Lane, Thurston 64 dwellings

Consultation Response on Affordable Housing Requirement

Key Points

1. Background Information:

- A development of 64 dwellings.
- This development triggers Local Plan Amended Policy H4 and therefore up to 35% affordable housing would be required on this site.
- Based on 64 dwellings and therefore 22 units of affordable housing would be sought. 22 affordable units have been included in the proposal by Laurence Homes.

2. Housing Need Information:

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

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

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

2.4 At May 2016 the Housing Register had 25 applicants registered for housing in Thurston and 17 of these had a local connection to the village. However as this is a planning gain site, it would be required to meet district wide need so the 980 figure is the one to be applied in this case.

- 11 x applicants with a 1 bed need
- 13 x applicants with a 2 bed need
- 6 x applicants with a 3 bed need
- 1 x applicant with a 4 bed need.

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

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

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

3. Affordable Housing Requirement for Thurston:

Affordable Housing Requirement	35 % of units = 20 affordable units
Tenure Split - 75% Rent & 25 % Intermediate e.g. New Build Homebuy accommodation, intermediate rent or shared ownership.	Affordable Rent = 15 units All rented units will be let as Affordable Rent Tenancies Intermediate = Shared Ownership = 7 units
Detailed Breakdown Rented Units	General Needs Affordable Dwellings: <ul style="list-style-type: none"> • 2 x 1B 2P Flats @ 48 sq m • 2 x 2B 3P Bungalows @ 63 sq m • 9 x 2B 4P Houses @ 76 sq m • 2 x 3B 5P Houses @ 85 sq m 15 Total
Detailed Breakdown Intermediate Units	General Needs Shared Ownership dwellings: <ul style="list-style-type: none"> • 2 x 2B 4P flats @ 48 sq m • 4 x 2B 4P Houses @ 76 sq m • 1 x 3 B 5P house @ 86 sqm 7 Total
Other requirements	Properties must be built to current Homes and Communities Agency Design and Quality Standards and be to Lifetimes Homes standards.
	The council is granted 100% nomination rights to all the affordable units in perpetuity.
	The Local Needs affordable homes will be restricted to local people in perpetuity

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

Julie Abbey-Taylor, Professional Lead – Housing Enabling.

Our Ref: 570/CON/4942/16
Date: 8th June 2017
Enquiries to: Steve Merry
Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk



All planning enquiries should be sent to the Local Planning Authority.
Email: planningadmin@baberghmidsuffolk.gov.uk

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

For the Attention of: Dylan Jones

Dear Dylan

PROPOSAL: Planning Application 4942/16 for Residential development consisting of 64 dwellings and associated highway, car parking and public open space

LOCATION: Norton Road, Thurston, Suffolk

ROAD CLASS: C

This letter is complimentary to that ref 570/CON/4942/16 dated 10th March 2017 and 3rd April 2017, which detailed Suffolk County Council's response to the cumulative effect that five developments in the parish of Thurston will have on the highway infrastructure.

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

Introduction

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

Off site Highway Works

3. Condition: No dwelling shall be occupied until a pedestrian crossing on Norton Road between Meadow Lane and Station Hill / Ixworth Road (uncontrolled) is constructed.

Reason: To provide safe pedestrian access from the site to the main village

4. Condition: Improvements shall be made to surface of Meadow Lane to provide a safe surface to promote cycle / pedestrian facilities (and maintain access to properties). These shall be delivered prior to occupation of the 32nd dwelling.

Reason: To ensure that Meadow Lane is suitable for use by pedestrians accessing the wider highway and public rights of way network

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

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

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

Estate Road 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.

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.

5. 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.

Highway Drainage

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

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

Travel Plan

On reviewing the application (MS/4942/16) for the proposed development of 64 dwellings on Meadow Lane in Thurston I have noticed that there has not been a Travel Plan or Transport Assessment submitted to identify any highway mitigation. Taking into account the size and location of the proposed development there would be some benefit to securing some measures to encourage sustainable travel. One such measure would be to secure a Resident Travel Pack, that includes a multi-modal voucher to allow the resident to purchase public transport tickets or cycle accessories. The value of the multi-modal voucher should be the equivalent of two monthly bus or rail tickets for travel from the site to Bury St Edmunds town centre, which is the main employment destination for Thurston residents according to the 2011 Census. Therefore the following condition is recommended:

11. Condition: Within one month of the first occupation of any dwelling, the occupiers of each of the dwellings shall be provided with a Residents Travel Information Pack. No less than 3 months prior to the first occupation of any dwelling, the contents of the Residents Travel Information Pack shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority and shall include walking, cycling and bus maps, latest relevant bus and rail timetable information, car sharing information and a multi-modal travel voucher. The Residents Travel Information Pack shall be maintained and operated thereafter.

Reason: To promote use of sustainable transport.

Proposed S106 Obligations

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 £22056 is required on commencement of construction work on site.
2. Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road. A contribution of £4040 is required on commencement of the first dwelling.

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

Dear Sir/Madam,

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

Kind Regards,

Wasil Khan
Town Planning Technician, Property

Network Rail
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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 15:10
To: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Land at Norton Road, Thurston

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

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

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

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

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

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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