



The Archaeological Service

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

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

Enquiries to: Kate Batt
Direct Line: 01284 741227
Email: kate.batt@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_2797
Date: 25th July, 2016

For the Attention of Lisa Evans

Dear Mr Isbell

Planning Application 2797/16 – Land to the South of Norton Road, Thurston: Archaeology

The proposed development site comprises 11ha of gently sloping arable land. The site lies in an area of archaeological potential recorded on the County Historic Environment Record, in close proximity to the medieval Church of St Peter (THS 006). The position and date of this feature suggests that the focus of settlement in the medieval period is likely to have been further east than the current village. Several features of probable archaeological origin are visible as cropmarks on aerial photographs available through Google and Bing. Evidence from the wider vicinity suggests occupation of prehistoric (THS 018, THS 008) through to medieval (THS MISC, THS 010) periods. Given the scale and position of the proposed development, and the proximity of known heritage assets, there is potential for the discovery of previously unrecorded 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.

There is currently insufficient information to "*describe the significance of any heritage assets affected*" as required under P128 of NPPF. SCCAS, therefore, recommend that a programme of archaeological investigation is undertaken before submission of a planning application, to inform determination of the application with regards to the impact of the proposal on the significance of heritage assets with archaeological interest and the wider historic environment. The pre-determination programme of archaeological works should include:

- Systematic geophysical survey
- Archaeological trial trench evaluation

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,

Kate Batt BSc (hons)

Senior Archaeological Officer
Conservation Team

From: David Pizzey
Sent: 26 July 2016 10:29
To: Lisa Evans
Cc: Planning Admin
Subject: 2797/16 Land to the south of Norton Road, Thurston.

Hi Lisa

I have no objection in principle to this application subject to it being undertaken in accordance with the protection measures indicated in the accompanying arboricultural report.

Whilst a number of trees and sections of hedgerow are proposed for removal these are generally of limited amenity value and/or poor condition and their loss will have negligible impact on the appearance and character of the local area. If you are minded to recommend approval of the scheme we will also require details of an arboricultural monitoring schedule in

order to help ensure the protective measures referred to are implemented effectively. This information can be dealt with under condition.

David

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

From: Iain Farquharson

Sent: 27 July 2016 09:57

To: Planning Admin

Subject: RE: Consultation on Planning Application Land to the South of Norton Road, Thurston IP31 3QH 2797/16

Our Ref: M3 181655

Sir/Madam

In response to the consultation request on the subject of Sustainability Issues please find our response below.

The documents provided in support of the application are very good, both in depth of detail and clearly evidence research into the locality.

We have no objection to this proposal but note that sustainability issues connected to the dwellings themselves ie construction materials, sources of heating, renewable energy generation, design and orientation or reduction in the reliance of electricity consumption have not been mentioned. Also the application does not offer any 3rd party accreditation for the environmental credentials eg Code for Sustainable Homes (or its replacement scheme)

We recognise this is an outline application but we still require some forethought into this area.

The application does not provide sufficient information to address council policy CS3 Reduce Contributions to Climate Change, therefore we recommend refusal until information on this topic is made available for consideration.

Iain Farquharson

Environmental Management Officer
Babergh Mid Suffolk Council

☎ 01449 724878

✉ iain.farquharson@baberghmidsuffolk.gov.uk

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 02 August 2016 14:22
To: Planning Admin
Subject: 191775 2797/16 - Outline - for residential development of up to 175 dwellings

Dear Sir / Madam

Application ref: 2797/16
Our Ref: 191775

Natural England has no comments to make on this application.

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

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

Yours faithfully

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

Tel: 02080261789
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

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

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

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

From: RM Floods Planning
Sent: 03 August 2016 07:43
To: Planning Emails

Cc: Lisa Evans

Subject: RE: JS reply Planning Application 2797/16 Land to the South of Norton Road, Thurston IP31 3QH

Further to the submission of the flood risk assessment (FRA) for the site we can advise that the following need amending and or reviewing

- Calculation need to be revised and resubmitted to allow for 40% climate change and not 30% as submitted in the FRA, we also note the following in errors in the submitted calculation.
 - Submitted calculation need to be submitted using FEH method or if using IH124 done for the 50ha and pro rata down for the 6.6ha alternatively us a rate of 2l/s/ha
 - SAAR value should be 587mm and not 600mm
- No details on how the properties will drain there surface water, but It is envisage that this will go into the pipe network and then into the large attenuation area
 - We would prefer to see an above ground open surface water conveyance feature as part of this development

The infiltration rate for the attenuation area is marginally acceptable and we would like to see additional infiltration test done in this area to satisfy us that infiltration will be a viable drainage solution as no other surface water drainage solution appears to exist.

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

BABERGH/MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Chief Planning Control Officer For the attention of: Planning

FROM: ^Officer Name, Environmental Protection Team DATE: 8.8.16

YOUR REF: 2797/16/OUT. EH - Land Contamination.

SUBJECT: Outline Planning Application (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 ...

Address: Land to the South of, Norton Road, 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

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Suffolk Fire and Rescue Service

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

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

Your Ref: 2797/16+S106
Our Ref: FS/F310954
Enquiries to: Angela Kempen
Direct Line: 01473 260588
E-mail: Fire.BusinessSupport@suffolk.gov.uk
Web Address: <http://www.suffolk.gov.uk>

Date: 09/08/2016

Dear Sirs

Land to the south of Norton Road, Thurston IP31 3QH
Planning Application No: 2797/16+S106

I refer to the above application.

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

Access and Fire Fighting Facilities

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

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

Water Supplies

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

Continued/

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

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

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

Yours faithfully



Mrs A Kempen
Water Officer

Enc: PDL1

Copy: Mr G Armstrong, Armstrong Rigg Planning, The Exchange, Colworth Science
Park, Sharnbrook, Bedford MK44 1LQ
Enc: Sprinkler information

Planningcontributions.admin@suffolk.gov.uk



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Suffolk Fire and Rescue Service

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

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

Your Ref: 2797/16+S106
Our Ref: ENG/AK
Enquiries to: Mrs A Kempen
Direct Line: 01473 260486
E-mail: Angela.Kempen@suffolk.gov.uk
Web Address: www.suffolk.gov.uk

Date: 9 August 2016

Planning Ref: 2797/16+S106

Dear Sirs

RE: PROVISION OF WATER FOR FIRE FIGHTING
ADDRESS: Land to the south of Norton Road, Thurston
DESCRIPTION: 175 dwellings
NO: HYDRANTS POSSIBLY REQUIRED: Required

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

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

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

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

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

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

Continued/

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

Yours faithfully



Mrs A Kempen
Water Officer

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From: RM PROW Planning
Sent: 09 August 2016 14:08
To: Planning Admin
Cc: geoff.armstrong@arplanning.co.uk; Sam Bye
Subject: RE: Consultation on Planning Application 2797/16

Our Ref: W523/006/ROW478/16

For The Attention of: Lisa Evans

Public Rights of Way Response

Thank you for your consultation concerning the above application.

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

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

Thurston Public Footpath 6 is recorded through the proposed development area.

We have no objection to these proposals.

Please include as footnotes in the decision notice:

Informative Notes:

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

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

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

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

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

Regards

Jackie Gillis

Green Access Officer

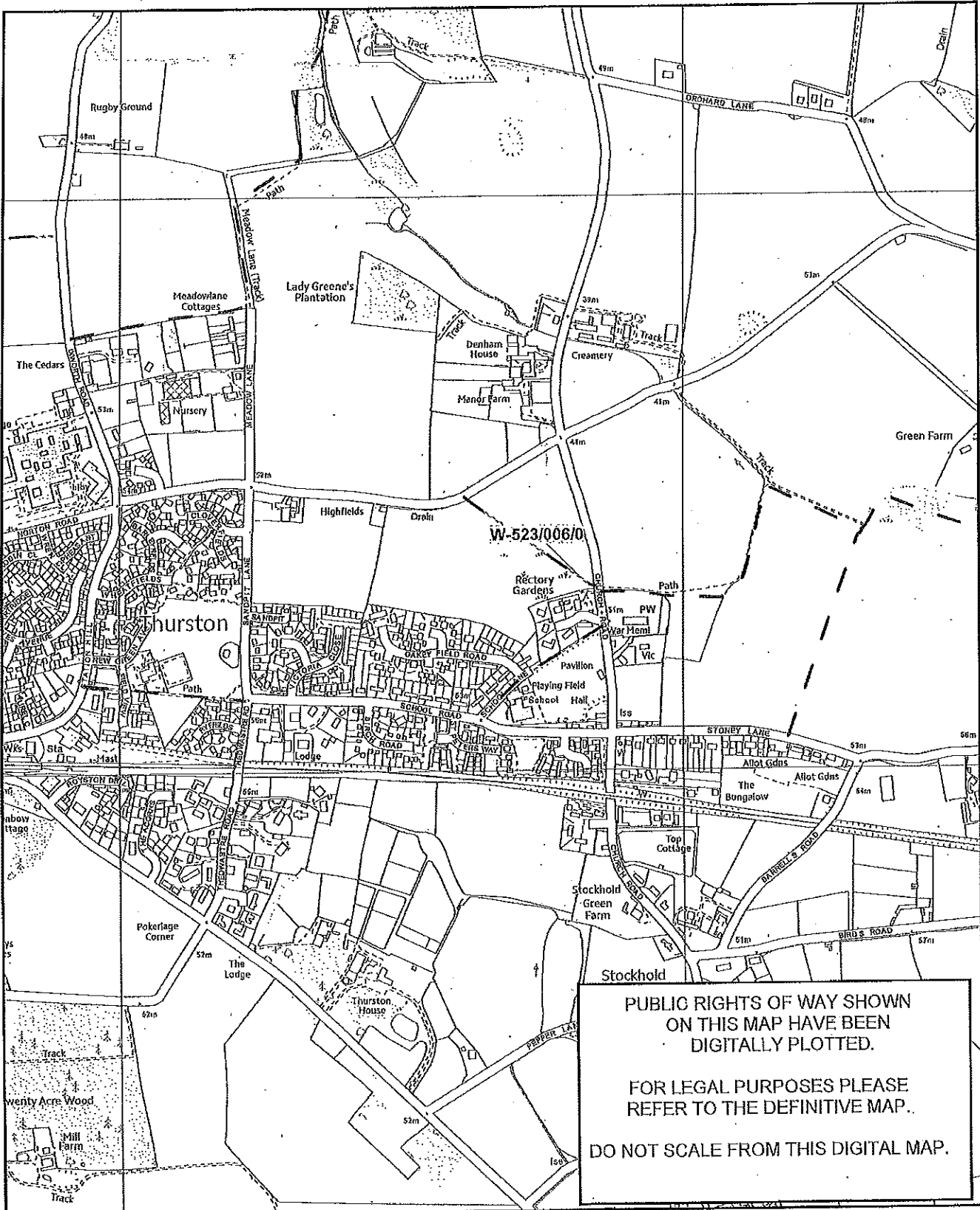
Access Development Team

Rights of Way and Access

Resource Management, Suffolk County Council

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

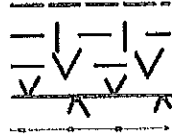
📍 <http://publicrightsofway.onesuffolk.net/> | [Report A Public Right of Way Problem Here](#)



2797/16 Land to the south of Norton Road, Thurston
Public Footpath 6



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



Ordnance Survey MasterMap

Public Footpath
 Bridleway
 Restricted Byway
 Byway
 Definitive Map Parish Boundary

Scale 1:7500



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Date: 09/08/216



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: 2797/16

Referring to the planning application referenced above, dated 26 July 2016, application for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, Land South of Norton Road, Thurston IP31 3QH, 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.

Date: 9 August 2016

Signature:



Name: Lorraine Willis

Position: Asset Manager

Highways England:
Woodlands, Manton Lane
Bedford MK41 7LW

lorraine.willis@highwaysengland.co.uk



Midlands and East (East)
Swift House
Hedgerows Business Park
Colchester Road
Chelmsford
Essex CM2 5PF
Tel: 0113 824 9111
Email: kerryharding@nhs.net

Our Ref: NHSE/MIDS/16/2797/KH

Your Ref: 2797 / 16

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

11 August 2016

Dear Sir / Madam

Outline Planning Application (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 and Norton Road. Land to the South of Norton Road, Thurston, IP31 3QH.

1.0 Introduction

1.1 Thank you for consulting NHS England on the above planning application.

1.2 I refer to your consultation letter on the above planning application and advise that, further to 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) (NHS England), incorporating West Suffolk Clinical Commissioning Group (CCG).

2.0 Existing Healthcare Position Proximate to the Planning Application Site

2.1 The proposed development is likely to have an impact on the services of 1 main GP practice operating within the vicinity of the application site. The GP practice does not have capacity for the additional growth resulting from this development.

2.2 The proposed development will be likely to have an impact on 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.

3.0 Review of Planning Application

3.1 The planning application does not appear to include a Health Impact Assessment (HIA) or propose any mitigation of the healthcare impacts arising from the proposed development.

3.2 A Healthcare Impact Assessment (HIA) has been prepared by NHS England to provide the basis for a developer contribution towards capital funding to increase capacity within the GP Catchment Area.

4.0 Assessment of Development Impact on Existing Healthcare Provision

4.1 The existing GP practice does not have capacity to accommodate the additional growth resulting from the proposed development. The development could generate approximately 420 residents and subsequently increase demand upon existing constrained services.

4.2 The primary healthcare services within a 2km radius of the proposed development and the current capacity position is shown in Table 1.

Table 1: Summary of position for primary healthcare services within a 2km radius (or closest to) the proposed development

Premises	Weighted List Size ¹	NIA (m ²) ²	Capacity ³	Spare Capacity (NIA m ²) ⁴
Mount Farm Surgery	12,232	768.40	11,206	-70.37
Total	12,232	768.40	11,206	-70.37

Notes:

1. The weighted list size of the GP 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. Patient Capacity based on the Existing NIA of the Practice
4. Based on existing weighted list size

4.3 The development would have an impact on primary healthcare provision in the area and its implications, if unmitigated, would be unsustainable. The proposed development must therefore, in order to be considered under the 'presumption in favour of sustainable development' advocated in the National Planning Policy Framework, provide appropriate levels of mitigation.

5.0 Healthcare Needs Arising From the Proposed Development

5.1 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.

5.2 The development would give rise to a need for improvements to capacity by way of extension, refurbishment or reconfiguration at Mount Farm Surgery; a proportion of the cost of which would need to be met by the developer.

5.3 Table 1 below provides the Capital Cost Calculation of additional primary healthcare services arising from the development proposal.

Table 1: Capital Cost calculation of additional primary healthcare services arising from the development proposal

Premises	Additional Population Growth (175 dwellings) ⁵	Additional floorspace required to meet growth (m ²) ⁶	Spare Capacity (NIA) ⁷	Capital required to create additional floor space (£) ⁸
Mount Farm Surgery	420	28.80	-70.37	57,600
Total	420	28.80	-70.37	£57,600

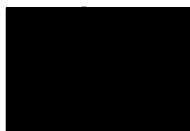
Notes:

1. Calculated using the Mid Suffolk District average household size of 2.4 taken from the 2011 Census: Rooms, bedrooms and central heating, local authorities in England and Wales (rounded to the nearest whole number).
 2. 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"
 3. Existing capacity within premises as shown in Table 1
 4. Based on standard m² cost multiplier for primary healthcare in the East Anglia Region from the BCIS Q1 2014 price Index, adjusted for professional fees, fit out and contingencies budget (£2,000/m²), rounded to nearest £.
- 5.4 A developer contribution will be required to mitigate the impacts of this proposal. NHS England calculates the level of contribution required, in this instance to be **£57,600**. Payment should be made before the development commences.
- 5.5 NHS England therefore requests that this sum be secured through Community Infrastructure Levy (CIL) linked to any grant of planning permission.

6.0 Conclusions

- 6.1 In its capacity as the primary healthcare commissioner, NHS England has identified that the development will give rise to a need for additional primary healthcare provision to mitigate impacts arising from the development.
- 6.2 The capital required through developer contribution would form a proportion of the required funding for the provision of capacity to absorb the patient growth generated by this development.
- 6.3 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. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.
- 6.4 The terms set out above are those that NHS England deem appropriate having regard to the formulated needs arising from the development.
- 6.5 NHS England is satisfied that the basis and value of the developer contribution sought is consistent with the policy and tests for imposing planning obligations set out in the NPPF.
- 6.6 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



Historic England

EAST OF ENGLAND OFFICE

Ms Lisa Evans
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582721

Our ref: P00519508

11 August 2016

Dear Ms Evans

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015
LAND TO THE SOUTH OF NORTON ROAD, THURSTON IP31 3QH
Application No 2797/16**

Thank you for your letter of 22 July 2016 notifying Historic England of the above application.

Summary

This application proposes a large residential development on farmland at the northern edge of Thurston village. This land sits between the village and the grade II* listed Manor Farm House. By bringing the edge of development closer to the listed building the development has the potential to erode the rural character of this setting and so harm its significance in terms of the NPPF. The application has not assessed the significance of the house or the impact on it as required by the NPPF.

Historic England Advice

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

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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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



Historic England

EAST OF ENGLAND OFFICE

Since the construction of Manor Farm House Thurston village has grown on its northern side toward the listed building, but there is still considerable undeveloped farmland around it. This is important in maintaining the original character of its setting and relationship with an agricultural landscape. The proposed development would bring further modern building (up to 175 houses and associated facilities) significantly closer to the listed building. The landscape around Thurston is relatively flat and open and the steeply pitched roof and tall chimneys of the house are quite prominent in the landscape. Indeed, the house has a large dormer window on its southern roof from which views towards the application site can probably be had. The development has the potential to bring modern development into the setting of Manor Farm House, which by eroding the rural character of its surroundings could harm its historic significance.

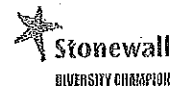
The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). The National Planning Policy Framework (NPPF) builds upon the 1990 Act. It identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings can be harmed by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favorably.

In order to allow identification of possible harm to the significance of heritage assets by proposed development paragraph 128 of the NPPF requires applicants to describe the significance of heritage assets affected and the contribution their setting might make to that significance. Sufficient information should also be provided to enable an understanding of the potential impact of the development on the assets. The Landscape and Visual Impact Assessment submitted with the current application mentions the grade II* listed house, but does not establish its significance or the effect the development might have on it. Viewpoint 6 is taken from the general area south of Manor Farm House and gives a general indication of how close the development might be to this view point. Although it is not ideal for considering the listed building we note that the Assessment concludes the impact on this view point would be 'low' but does not contain any images to demonstrate this.

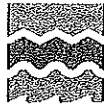


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EAST OF ENGLAND OFFICE

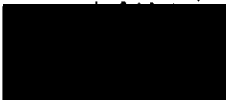
The Archaeological Desk Based Assessment also mentions Manor Farm House, but says nothing of its significance or the contribution made by its setting. Despite being a desk based exercise it concludes the application site is 'not part of the setting' of Manor Farm House. This is not a helpful statement as it is the impact of the development on any area in which the heritage asset can be 'experienced' (the definition of setting in the NPPF) that should be established.

We conclude that the application does not contain sufficient information to satisfy the requirements of paragraph 129 of the NPPF, a requirement that should be taken seriously given that Manor House Farm falls within the top 5 of listed buildings nationally. Without any such assessment we maintain our concern that the development could result in harm to the listed building's significance in terms of the NPPF paragraph 132 and would not support the granting of consent as the application stands.

Recommendation

We are concerned the proposed development in the vicinity of the grade II* listed Manor Farm House could result in harm to the significance of the historic building in terms of paragraph 132 of the NPPF. The information required by paragraph 128 to allow assessment of this impact has not been produced. We would not support the granting of consent at this stage and recommend this application is refused, but would be keen to see any further details which are submitted and offer further advice to the Council.

Yours sincerely



David Eve

Inspector of Historic Buildings and Areas
E-mail: david.eve@HistoricEngland.org.uk



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MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Lisa Evans, Development Control Team

FROM: Joanna Hart, Environmental Protection Team

DATE: 12.08.2016

YOUR REF: 2797/16/OUT

SUBJECT: Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Outline Planning Application (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 and Norton Road.

Please find below my comments regarding 'Environmental Health - Other issues' only.

Thank you for your consultation on the above application.

I note that The Victoria public house is located to the north west of the site and that illustrative masterplan shows that a number of proposed residential plots which back directly onto the public house.

The Victoria is a licensed premises which has permissions for live and recorded music, both indoors and outdoors, until 00.00hrs Monday – Thursdays and Sundays and 01.00hrs on Fridays and Saturdays. Opening hours are an additional 30 minutes each day.

I am concerned that the proximity of the public house (including noise from the beer garden and play area), particularly during the evening has potential to result in loss of amenity at the new dwellings. If substantiated noise complaints were received, it could result in the operation of the public house being fettered. I also note that there is an existing dwelling in close proximity to the public house, although I am not sure whether it is in the same ownership, although this does not the same unobstructed line of sight to the beer garden that the new dwellings would have.

The site is in proximity to a number of existing residential dwellings and for this reason there is a risk of loss of amenity during the construction phase of the development. I would therefore recommend that it would be essential for a construction management plan to be required by means of condition. Such a plan shall include details of operating hours (which shall be limited to 08.00 – 18.00 Monday – Friday, 09.00 – 13.00hrs on Saturdays, with no working to take place on Sundays or Bank Holidays. Deliveries should also be limited to these hours), means of access, traffic routes, vehicle parking and manoeuvring areas (site operatives and visitors), loading and unloading of plant and materials, wheel washing facilities, hours of operation and vehicle movements, lighting, location and nature of compounds and storage areas (including maximum storage heights), waste removal, temporary buildings and boundary treatments, dust management, noise management and litter management during the construction phases of the development. Thereafter, the approved construction plan shall be fully implemented and adhered to during the construction phases of the development hereby approved, unless otherwise agreed in writing by the Local Planning Authority.

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

Kind regards
Joanna Hart
Senior Environmental Protection Officer

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
Suffolk
IP6 8DL

August 12th 2016

Dear Mr. Isbell,

Proposal: Outline Planning Application (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 and Norton Road

Location: Land to the South of Norton Road, Thurston

Application Number: 2797/16

The Parish Council wishes to place on record that it objects to planning application 2797/16 in its current form for the following reasons:

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

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

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

The Parish Council does not hold with the views expressed in the documents submitted that the application is sympathetic to the countryside in which it is situated and that it fails to protect the intrinsic character of the countryside by the density and mix of properties being proposed. It is felt that the development of 175 dwellings will intrude into an area of currently open, undeveloped, countryside resulting in an encroachment of built development extending beyond the settlement boundary of Thurston. This will harm the character and appearance of this open area and will be contrary to Policy CS5 of the Core Strategy, Policy FC1.1 of the Core Strategy of the Mid Suffolk Core Strategy Focus Review (2012) and saved Policies H13 and H16 of the Mid Suffolk Local Plan. Furthermore it is felt that the development fails to ensure that it reflects the local character and identity of the area immediately surrounding the proposed development and is therefore inconsistent with paragraph 58 of the NPPF.

The Parish Council would also recommend that Highways be consulted as to the suitability of the location of the site; the access roads leading to the development; and pedestrian safety with regards to crossing points.

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).

It is furthermore held that as the development fails to demonstrate that it has considered safe and suitable access points for all people it is contrary to paragraph 32 of the NPPF. As the development fails to give priority to pedestrian and cycle movements and with reference to the siting of this application would not support the transition to a low carbon future, it is 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.

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

The Parish Council feels that given the 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 and Thedwastre Road and entry and exit points onto the A14.

The Parish Council would also like to recommend that Suffolk County Council be involved in the discussion of future growth in Thurston with reference to the impact that this will have on the provision of education. As mentioned within the letter from Thurston's Neighbourhood Plan Team, both the Thurston Primary Academy School and Thurston Community College are at capacity (taking into account existing planning approvals) and as such this application will ensure that the educational infrastructure is unlikely to meet the demand placed on it by 175 dwellings. The Parish Council is aware that the application is for phased development but feels that from the outset the total provision should be understood and capacity explored. As such the Parish Council feels that this application will put a negative strain on the existing infrastructure and as such would be contrary to Policy CS6 of the Core Strategy.

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

Yours sincerely,

Victoria S Waples

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



Your ref: 2797/16
Our ref: 00045522
Date: 16 August 2016
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Lisa,

Re: Thurston, land south of Norton Road

I set out below Suffolk County Council's views, which provides our infrastructure requirements associated with this application and this will need to be considered by the Council.

Proposed number of dwellings from development:	2 bedroom+ Houses	Total
	175	175
Approximate persons generated from proposal:	403	403

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, 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

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development in Mid Suffolk.

Community Infrastructure Levy

Mid Suffolk District Council adopted a CIL Charging Schedule On 21st January 2016 and started charging CIL on planning permissions granted from 11th 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 6th 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 CIL, and therefore would meet the new legal test. It is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

Site specific mitigation will be covered by a planning obligation and/or planning conditions.

The details of specific CIL and 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 level	Minimum pupil yield:	Required:	Cost per place £ (2016/17):
Primary school age range, 5-11*:	43	43	16,429
High school age range, 11-16:	31	0	18,355
Sixth school age range, 16+:	5	0	19,907

Total education contributions:	£706,447.00
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The local catchment schools are Thurston Church of England Primary Academy and Thurston Community College.

We currently forecast to have no surplus places at the catchment Primary School to accommodate children arising, 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. The Mid Suffolk Regulation 123 List indicates that primary school places at new schools are not identified for funding through CIL.

The County Council will require proportionate costs to land and build costs for a 420 place primary, but discounting the 210 places in relocating the existing primary school which will be funded by the County Council. *A proportionate contribution, based on 43 children is calculated as follows

$$\begin{aligned}
 & \text{£6.9 m construction cost} / 420 \text{ primary school places} \\
 & \text{£6.9m} / 420 \text{ places} = \text{£16,429} \\
 & \text{This development creates the need for 43 additional pupil places} \\
 & \text{£16,429} \times 43 \\
 & = \text{£706,447.00}
 \end{aligned}$$

This calculation excludes consideration of land costs which would be calculated as follows:

Pupils arising from this site (43) / Total site capacity (420 places)

$$43 / 420 = 0.10$$

Proportionate contribution = 10.2% of total site cost.

So, a total site to be secured for the new primary school at £100k per acre, and a total cost of £543,000 this would equate to a contribution of **£54,300** towards the land cost from this site.

The catchment secondary school is Thurston Community College. Currently this school has some spare capacity with a sixth form campus off site at Beyton. The capacity may change if the school reconfigures in the future, but Ixworth Free School could accommodate additional secondary age pupils from new houses. However, this could change when accounting for the other proposed developments in these areas. Therefore, this development is not expected to necessitate a bid for the District Council's CIL funds.

- 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. Section 7 of the Childcare Act 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 175 dwellings, the County Council anticipates around 18 pre-school pupils eligible for funded early education. Currently there is sufficient capacity for only 10 pre-school pupils from this development. 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 26 place setting, providing sufficient capacity for 52 children in total. Our latest estimates are that a 26-place early education setting costs £624,105.00 to construct on a site of approximately 641.70m² (note: this includes outdoor space).

The Mid Suffolk Regulation 123 List indicates that new early education settings are not identified for funding through CIL. A proportionate contribution, based on 18 children of the total 52 who would be accommodated within the new setting, could be calculated as follows:

£624,105 construction cost / 52 children (at a 26 – place setting)
= £12,002.02 per place

This development creates a need for 8 additional places.
£12,002.02 per place x 8 additional children
= £96,016 total proportionate contribution from 175 dwellings
£96,016 total contribution / 175 dwellings
= £549 per dwelling

Land costs are included within the calculation of the primary school land contribution.

	Minimum number of eligible children:	Required:	Cost per place £ (2016/17):
Pre-School age range, 2-4:	18	8	12,002

Required pre-school contributions:	£96,016.00
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- 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:
- In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
 - 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.
 - Local neighbourhoods are, and feel like, safe, interesting places to play.
 - 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 will be co-ordinated by Christopher Fish of Suffolk County Highway Network Management and is

expected to include:

Travel Plan – Require the applicant to submit a revised travel plan based on comments raised in the Local Highways Authority letter prior to the determination of this application. The following contributions will need to be secured by a S106 agreement. The contributions are likely to be as follows:

Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum until five years have passed after occupation of the final dwelling. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan

Travel Plan Implementation Bond - £104,631 (based on SCC calculations on the estimated cost of fully implementing the travel plan for 140 dwellings). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves

The following Section 106 obligations would also be required:

- Approval and full implementation of the Interim Residential Travel Plan
- Provision of an approved welcome pack to each resident on first occupation
- Approval and full implementation of the Full Residential Travel Plan
- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

Passenger transport - A development of this size is highly likely to generate new passengers for Galloways 384 and 385 routes which currently run around the boundaries of the site. Given that they are planning site entrances from Norton Road and Sandpit Lane, and it looks likely to be able to access through the site it is expected that the bus operator will choose to divert some of the existing journeys through the site. As such, provision of new bus stops on the road are required. These should be fitted with the usual raised kerbs, bus shelters and RTP1 screens/power supplies. Current prices would be £2,500 per kerb, £6,000 per shelter including base and £10,000 per screen. The existing Cloverfield stops are located are likely to be where the new access road is proposed. They will therefore need to be moved south of the junction to enable current usage to continue whether buses are diverted through the site or not. From the plan it does not look like there will be suitable footway access through to Church Road, so the Cloverfield stops will be the nearest for any services which are not sent through the site. They should therefore also be improved.

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). The guidance can be viewed at <http://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Planning/2014-11-27%20Suffolk%20Guidance%20for%20Parking.pdf>

5. **Libraries.** Refer to the NPPF 'Section 8 Promoting healthy communities'. A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space.

Using established methodology, the capital contribution towards libraries arising sought from this scheme is stated below and would be spent on the development of library services serving the area of the development, and outreach activity from the nearest library, at Thurston and allows for improvements and enhancements to be made to library services and facilities. Thurston library has a deficient floor area against the model floor area by 29 sq metres at the local catchment library.

Libraries contribution:	£37,800.00
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6. **Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

Waste Contribution:	£ 0.00
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7. 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.

8. 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 WMS took effect from 06 April 2015.

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

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

Provision of water (fire hydrants) will need to be covered by appropriate planning conditions at the reserved matters stage, in agreement with the Suffolk Fire and

Rescue Service. The County Council would encourage a risk-based approach to the installation of automatic fire sprinklers.

10. 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. Direct access from a new development to the nearest BT exchange is required (not just tacking new provision on the end of the nearest line). This will bring the fibre optic closer to the home which will enable faster broadband speed. Refer to the NPPF paragraphs 42 – 43.

11. Legal costs. SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.

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

13. Summary Table split by developer contributions mechanism

Service Requirement	Contribution per dwelling	Capital Contribution
Education – Primary – see table below		
Education – Secondary	£ 0.00	£ 0.00
Education – Sixth Form	£0.00	£ 0.00
Pre-School – see table below		
Transport - see section 4 above		
Libraries	£216.00	£37,800.00
Waste	£0.00	£0.00
Total	£216.00	£37,800.00

The table above would form the basis of a future bid to the District Council for CIL funds if planning permission was granted and implemented. This will be reviewed when a planning application for planning permission is submitted.

Service Requirement	Contribution per dwelling	Capital Contribution
Education – Primary places including land cost	£4,347.13	£760,747.00
Pre-School	£548.66	£96,016.00
Total	£4,895.79	£856,763.00

Dependent on the submitted details, if a planning application was submitted we would expect the above to be requested as a **planning obligation under Section 106** to provide proportionate contributions to a new primary school and pre-school setting.

Yours sincerely,

P J Freer

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

cc Neil McManus, SCC
 Iain Maxwell, SCC

From: Griss, Steve [mailto:Steve.Griss@suffolk.pnn.police.uk]
Sent: 18 August 2016 12:19
To: Julie Havard
Subject: Planning Application 2797/16 - Hopkins Homes, Thurston

Julie

Planning Application 2797/16 - Hopkins Homes, Thurston

I am the Traffic Management Officer for Suffolk Constabulary and reply only in relation to the traffic management part of the application.

I have no objection to the scheme but ask that consideration be given to the following:

1. There was mention in the application of extending the 30 mph speed limit in Norton Road towards the direction of Church Road. In my view this is essential to protect the new entrance/exit to the development and to ensure vehicles are entering the area at appropriate speeds. The extension needs to be sufficient distance and be highly visible to get the message across to drivers.
2. There are many routes that drivers will be able to take travelling to and from the new development. My view is that it is highly likely that Sandpit Lane will be a choice for many. This raises concerns in relation to the Thedwastre Road priority scheme over the railway bridge and the stop sign/line at the junction of Thurston Road (Pokerage Corner). I assume the stop sign was put up in the first place as a result of the reduced visibility. It was suggested in the application that the Church Road route would be more attractive for drivers. That may be the case but I wonder how the developers will make that happen.

Thank you for the opportunity to comment.

Regards,
Steve

Steve Griss

Traffic Management Officer

Specialist Operations

Suffolk Constabulary

Portal Avenue

Martlesham Heath, Suffolk, IP5 3QS

Tel: 01473 613713

www.suffolk.police.uk

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Planning Applications – Suggested Informative Statements and Conditions Report

AW Reference: 00016190
Local Planning Authority: Mid Suffolk District
Site: Sandpit Lane, Thurston
Proposal: Creation of 175 x C3 Dwellings
Planning Application: 2797/16

Prepared by: Mark Rhodes

Date: 31 August 2016

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

ASSETS

Section 1 – Assets Affected

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

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

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

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

Section 3 – Foul Sewerage Network

- 3.1 The sewerage system at present has available capacity for these flows, via a pumped connection to the public foul sewer in Sandpit Lane at a rate of 3.8l/s. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection

Section 4 – Surface Water Disposal

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

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

Section 5 – Trade Effluent

- 5.1 Not applicable
-



Consultation Response Pro forma

1	Application Number	2797/16 Norton Road, Thurston	
2	Date of Response		
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.	1. The Heritage Team considers that the proposal would cause <ul style="list-style-type: none"> • less than substantial harm to a designated heritage asset because it would erode the rural setting of Manor Farmhouse. 2. The Heritage Team recommends that refinement of the layout and landscaping scheme be pursued.	
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>Statutory duty Recent court rulings have confirmed that the statutory duties in the Planning (Listed Buildings and Conservation Areas) Act 1990 have the effect of a strong presumption against harm to listed buildings and their setting. Any harm is to be given great weight in decision-making. Similarly the National Planning Policy Framework expects great weight to be afforded to the conservation of listed buildings and their setting (conservation being defined as preservation from harm and enhancement where appropriate).</p> <p>The following assessment applies the method set out in Historic England's advice note GPA3 <i>The Setting of Heritage Assets</i>.</p> <p>Heritage assets The site is a large area of agricultural bordering the existing settlement to its west and south. It comes close at its easternmost point to the Church of St Peter, listed Grade II, and at its north-east corner to Manor Farm, listed Grade II*, and its associated barn complex listed Grade II and now converted. Other heritage assets are at such a distance that the proposed development would have no material impact.</p> <p>The setting and significance of assets St Peter's Church is a medieval parish church largely rebuilt about 1861 following the collapse of the tower onto</p>	

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		<p>the nave. The church and tower continue the function of the original building as landmark for the community. Thurston is historically a very scattered settlement and the church has always stood quite detached from the village along with a cluster of houses. The church tower is readily visible from the site, and is a prominent landmark along the footpath across the eastern part.</p> <p>Manor Farmhouse does not seem to succeed an earlier building, but is associated historically with Nether Hall to the north. As such its agricultural surroundings make a less important contribution to its significance, which relies mainly on its being designed by Philip Webb, one of the most influential British architects and designers of the late 1800s. Webb was also architect for contemporary alterations and additions to Nether Hall. Unusually, the Farmhouse is designed in the 'Queen Anne' style, echoing urban brick buildings of about 1700, which contrasted with the more ostentatious gothic revival style of the mid-1800s. It is therefore in the vanguard of architectural design in the 1870s.</p> <p>In its north-east corner the site slopes away towards the stream, and the fall continues past Manor Farmhouse. This gives the Farmhouse and farm buildings some sense of seclusion from the level plateauland of most of the site. A line of poplars on the roadside to the south of the Farmhouse contributes to this sense. Although the Farmhouse is tall and has tall chimneys and a viewing platform on its roof, it is not readily visible from much of the site. The introduction of horse-related development around the Farmhouse, and residential development round the converted farm buildings has also eroded the rural character of the area.</p> <p>Impact of the proposal The proposal has potential to harm the setting of both listed buildings by introducing a large area of residential development into their largely rural surroundings; this would be more noticeable at Manor Farmhouse which is currently experienced as an isolated rural building.</p> <p>Only from the footpath within the site would there be noticeable impact on existing views towards the church with new development to the south of the path. Views across the site would become intermittent rather than interrupted. The impact would be significant in a limited arc of views, and harm would be low.</p>
6	Amendments, Clarification or Additional Information Required	The illustrative plan shows that open space would be preserved towards the east end of the site, and that housing development would be limited to the level part. A

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	<p>(if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	<p>belt of tree planting would run along the north-east edges of the built development. Heritage would recommend that the distribution of open space within the site be re-considered with a view to keeping built development back from the north-eastwards slope. The depth and composition of the north-eastern planting belts should be enhanced; the Landscape Officer's advice should be sought on this point.</p>
7	<p>Recommended conditions</p>	

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DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Babergh & Mid Suffolk District Councils, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Mrs S Hooton
Senior Ecologist
Natural Environment Team
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Web: <http://www.suffolk.gov.uk>

Your Ref: 2797/16
Our Ref: Ecology/MSDC/Norton Rd Thurston
Date: 23rd September 2016

Ms Lisa Evans
Planning Dept
Mid Suffolk District Council
131 High St
Needham Market
Suffolk
IP6 8DL

Dear Lisa,

Outline Planning Application (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 and Norton Road Land to the South of Norton Road, Thurston IP31 3QH

Based on the ecological reports provided by the applicant and a site visit carried out, on the 26th July, with the SCC Senior Landscape Officer Mr Phil Watson, I offer the following comments:

Likely Ecological Impacts

Both ecological reports were undertaken by suitably qualified ecologists with the necessary skills and experience to conduct this type of assessments and precautionary measures recommended to maintain biodiversity, protected and priority across the development site.

The Extended Phase 1 habitat survey report (Southern Ecological Solutions, June 2016) identified that except for a hedgerow survey, no additional surveys were considered necessary to assess the likely impacts of the proposed development on biodiversity. This is despite the report noting (para 5.19) that the hedgerow habitats were likely to be of potential value to bats for foraging and /or commuting.

A Hedgerow Survey report (Southern Ecological Solutions, June 2016) has been submitted and confirmed losses of this Priority habitat with recommended mitigation and

enhancement measures to avoid significant adverse impacts. However as no bat activity surveys were carried out, the assessment of the hedgerows to be lost to the development did not include any use of them by Annex 2 bat species or significant use by common bat species.

I am concerned therefore that the likely impact of the development on bats (European Protected Species) may have been underestimated. However given that the 2 hedgerows to be severed are isolated from the network in the wider countryside and bat sensitive lighting is recommended to minimise light falling on boundary trees and hedgerows (using directional LED or lamps fitted with shields), in this instance I am satisfied that no further survey or assessment can be reasonably required as likely impacts can be dealt with by condition of any consent.

Although the report dismisses the likelihood of breeding or wintering birds being present, there is no consideration of use of the site by farmland birds such as skylark. Having visited the site, I consider that the availability of nesting habitat for this species is limited as the boundary trees and hedges mean that the field size is too small for them to attempt nesting, but I would have expected to read a justification such as this to adequately consider this Priority species. The report includes consideration of hedgehogs and brown hare and recommends enhancements including fencing including cut-outs which should be implemented throughout the development.

Recommendations

Subject to the conditions below in respect of planting and landscaping and a condition to control the design & ecological impact of external lighting, I am satisfied that significant impacts on bats (European Protected Species) can be adequately controlled:

1. CONCURRENT WITH RESERVED MATTERS: EXTERNAL LIGHTING

No external lighting shall be provided within a development area or phase unless details thereof have first been submitted to and approved in writing by the Local Planning Authority. Prior to commencement a detailed lighting scheme for areas to be lit shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall show how and where external lighting will be installed, (through technical specifications and the provision of appropriate lighting contour plans which shall include lux levels of the lighting to be provided), so that it can be;

- a) Clearly demonstrated that areas to be lit have reasonably minimised light pollution, through the use of minimum levels of lighting and features such as full cut off cowls or LED.
- b) Clearly demonstrated that the boundary vegetation to be retained, as well as that to be planted, will not be lit in such a way as to disturb or prevent bats using their territory or having access to their breeding sites and resting places or foraging areas, through the use of minimum levels of lighting and features such as full cut off cowls or LED.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved scheme, and shall be maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

2. CONCURRENT WITH RESERVED MATTERS: SOFT LANDSCAPING

No development shall commence within a development area or phase, until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for that development area/phase, drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities, weed control protection and maintenance and any tree works to be undertaken during the course of the development. This scheme of shall also include the planting required to provide the necessary ecological mitigation and enhancement identified in the application. Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

3. PROTECTION OF BREEDING BIRDS DURING CONSTRUCTION

No removal of hedgerows, trees or shrubs shall take place in any phase of the development, between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the Local Planning Authority.

4. CONCURRENT WITH RESERVED MATTERS: RECOMMENDATIONS AS SET OUT IN ECOLOGICAL REPORT (BIODIVERSITY MITIGATION AND ENHANCEMENTS)

The development shall be carried out in accordance with the recommendations as set out in Section 5 of the Extended Phase 1 habitat survey report (Southern Ecological Solutions, June 2016)

Reasons

1. The applicant has provided sufficient information to allow the LPA to discharge its duties under the UK Habitats Regulations.
2. The applicant has provided sufficient information to allow the LPA to discharge its duties under the Wildlife & Countryside Act 1981 as amended.
3. The applicant has provided sufficient information to allow the LPA to discharge its duties under s40 of the NERC Act 2006 (Priority Species)

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

Yours sincerely

Sue Hooton CEnv CMIEEM
Senior Ecologist

Phil Watson Senior Landscape Officer
Natural Environment Team

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IPSWICH

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Web: <http://www.suffolk.gov.uk>

Your Ref: 2797/16
Our Ref:
Date: 04/10/2016

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Ms Lisa Evans
Planning Dept
Mid Suffolk District Council
131 High St
Needham Market
Suffolk
IP6 8DL

Dear Lisa,

Outline Planning Application (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 and Norton Road Land to the South of Norton Road, Thurston IP31 3QH

Based on the information provided by the applicant and a site visit carried out, on the 26th July, with the SCC Senior Ecologist Mrs Sue Hooton, I offer the following comments.

The site and landscape

The site is on arable land at the edge of the village and as a result only parts of the site have a very close relationship the existing built form. The eastern parts of the site are visually exposed and visible from the wider countryside to the east.

The information provided by the applicant

The applicant has provided a reasonably effective LVIA which has assessed the proposal in outline as two storey dwellings. The findings recognise the sensitivity of the site and as a result have suggested how the scheme should be designed.

However, the outline scheme as set out on drawing Thur/01 *Development Framework Plan* does not appear to wholly reflect the basis on which the LVIA as it includes some housing of up to three storeys.

It is also notable that the LVIA has attempted dealt with potentially significant heritage issues which it may have been more appropriate to deal with in a Heritage Assessment. In We are working towards making Suffolk the Greenest County. This paper is 100% recycled and made using a chlorine free process.

consultation with the LPA the applicant has subsequently submitted a Heritage Assessment. This is a matter for the Conservation Officers and other relevant consultees to provide detailed advice.

Likely Landscape and Visual effects

The character of the site itself will also undergo very significant change. As a consequence there will be a significant change in outlook for adjacent residents. The proposal will create a new built edge to the village and on the eastern side this will have a more widespread visual impact.

The submitted LVIA has identified the sensitivity of the eastern part of the site, the impacts on the setting of a Grade II* listed building, and the sensitivity of, and impact on, footpath users.

I therefore suggest that a detailed Landscaping Masterplan is required in order to demonstrate in more detail how these issues will be dealt with should be secured by condition. The agreed landscape masterplan would then form the basis of the detailed conditions in respect of hard and soft landscaping, as well as ecological mitigation open space and SuDs layout.

This plan should also clarify the distribution of dwelling heights across the site.

It should be noted that these comments do not deal with impacts on the setting of adjacent listed buildings or impacts on the conservation area. This is a matter for the Conservation Officers.

Recommendations

I note that the parameter plan Thur/01 is not clear in respect of the height and location of 2.5-3 storey housing. I suggest that given the sensitivity of the receiving landscape, and for the avoidance of doubt, the parameter plan Thur/01 should be updated to *confirm* the proposed layout and maximum heights prior to determination.

Based on the findings of the LVIA it is likely that the most eastern block of 2.5-3 storey dwellings will not be compatible with the visual sensitivity of the receiving landscape.

Subject to confirmation of this detail, I suggest the proposal is acceptable in landscape terms with the following conditions;

CONCURRENT WITH SUBMISSION OF FIRST RESERVED MATTERS: HARD AND SOFT LANDSCAPING MASTERPLAN

Before any development is commenced, and concurrent with the submission of the Reserved Matters application(s), A Landscaping Masterplan shall be submitted to and agreed by the local planning authority. The Landscape Masterplan shall to include;

- a) The layout and arrangement of soft landscaping, proposed range species of trees shrubs and other planting and seeding, to also include proposed planting and

seeding of SuDs attenuation features and the location of any ecological mitigation and enhancement features.

- b) The layout and arrangement of hard landscaping, including outline information of the materials palette and design principles to be adopted and the lighting arrangements for the site as a whole.
- c) The agreed Landscape Masterplan shall form the basis of the detailed hard and soft landscaping scheme/s

CONCURRENT WITH RESERVED MATTERS: DESIGN CODE

Concurrent with the submission of the Reserved Matters application (s), a Design Code shall be submitted to the Local Planning Authority. The Design Code shall pertain to and include the following: architectural design and materials, the function and treatment of open spaces, street types and materials, parking, boundary treatments (including the details of screen walls and fences for individual dwellings), movement patterns (including connectivity to the offsite public rights of way network), lighting, security principles and domestic waste bin storage arrangements. Thereafter the development shall be carried out in accordance with the approved details.

CONCURRENT WITH RESERVED MATTERS: SOFT LANDSCAPING

No development shall commence within a development area or phase, until there has been submitted to and approved in writing by the Local Planning Authority a scheme of soft landscaping for that development area/phase, drawn to a scale of not less than 1:200. The soft landscaping details shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants noting species, plant sizes and proposed numbers/ densities, weed control protection and maintenance and any tree works to be undertaken during the course of the development. This scheme shall also include the planting required to provide the necessary ecological mitigation and enhancement identified in the application. Any planting removed, dying or becoming seriously damaged or diseased within five years of planting shall be replaced within the first available planting season thereafter with planting of similar size and species unless the Local Planning Authority gives written consent for any variation.

CONCURRENT WITH RESERVED MATTERS: HARD LANDSCAPING

No development shall commence within a development area or phase, until full details of a hard landscaping scheme for that area/phase has been submitted to and approved in writing by the Local Planning Authority. These details shall include proposed finished levels and contours showing earthworks and mounding; surfacing materials; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artefacts and structures (for example furniture, play areas and equipment, refuse and/or other storage units, signs, lighting and similar features); proposed and existing functional services above and below ground (for example drainage, power, communications cables and pipelines, indicating lines, manholes, supports and other technical features).

CONCURRENT WITH RESERVED MATTERS: EXTERNAL LIGHTING

No external lighting shall be provided within a development area or phase unless details thereof have first been submitted to and approved in writing by the Local Planning Authority. Prior to commencement a detailed lighting scheme for areas to be lit shall be

submitted to and approved in writing by the Local Planning Authority. The scheme shall show how and where external lighting will be installed, (through technical specifications and the provision of appropriate lighting contour plans which shall include lux levels of the lighting to be provided), so that it can be;

- a) Clearly demonstrated that areas to be lit have reasonably minimised light pollution, through the use of minimum levels of lighting and features such as full cut off cowls or LED.
- b) Clearly demonstrated that the boundary vegetation to be retained, as well as that to be planted, will not be lit in such a way as to disturb or prevent bats using their territory or having access to their breeding sites and resting places or foraging areas, through the use of minimum levels of lighting and features such as full cut off cowls or LED.

All external lighting shall be installed in accordance with the specifications and locations set out in the approved scheme, and shall be maintained thereafter in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

PRIOR TO COMMENCEMENT: TREE PROTECTION

Any trees, shrubs and hedgerows within, or at the boundary of, the development area or phase, shall be protected in accordance with a scheme of tree protection, (BS5837:2012), to be agreed in writing with the Local Planning Authority prior to commencement. The Local Planning Authority shall be advised in writing that the protective measures/fencing within a development area/phase have been provided before any equipment, machinery or materials are brought onto the site for the purposes of development and shall continue to be so protected during the period of construction and until all equipment, machinery and surplus materials have been removed.

Within the fenced area no work shall take place; no materials shall be stored; no oil or other chemicals shall be stored or disposed of; no concrete, mortar or plaster shall be mixed; no fires shall be started; no service trenches shall be dug; no soil shall be removed or ground level changed at any time, without the prior written consent of the Local Planning Authority.

Reasons

I have made these recommendations in order to reasonably minimise the adverse impacts of the development on the character of the landscape and local visual amenity having particular regard for Policy CS5.

Yours sincerely

Phil Watson
Senior Landscape Officer



Consultation Response Pro forma

1	Application Number	2797/16/OUT – Land to the South of Norton Road, Thurston	
2	Date of Response	5 th October 2016	
3	Responding Officer	Name:	Louise Barker
		Job Title:	Housing Enabling Officer
		Responding on behalf of...	Strategic Planning
4	Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	No objection.	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>This is an outline development proposal for 175 residential dwellings and triggers an affordable housing provision requirement of 35% under altered policy H4 of the Mid Suffolk Local Plan (on development proposals of 5 units and over outside of Stowmarket and Needham Market) equating to 61 affordable housing units.</p> </div> <p>1. Housing Need Information:</p> <p>1.1 The Ipswich Housing Market Area, Strategic Housing Market Assessment (SMHA) document, updated in 2012, confirms a continuing need for housing across all tenures and a growing need for affordable housing.</p> <p>1.2 The 2012 SHMA indicates that in Mid Suffolk there is a need for 229 new affordable homes per annum. The Survey also confirmed that an appropriate affordable housing tenure split for the District is 75% rented and 25% low cost home ownership tenure accommodation.</p>	

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		<p>1.3 Furthermore the 2014 Suffolk Housing Needs Survey shows that there is high demand for smaller homes, across all tenures, both for younger people, who may be newly forming households, and also for older people who are already in the property owning market and require different, appropriate housing, enabling them to downsize. Affordability issues are a key driver for this increased demand for smaller homes.</p> <p>1.4 With an aging population, both nationally and locally new homes should, wherever possible, be built to Lifetime-Homes standards and this can include houses, apartments and bungalows.</p> <p>1.5 The Suffolk Housing Needs Survey also confirms that there is strong demand for one and two bedroom flats/apartments and houses. Developers should consider flats/apartments that are well specified with good size rooms to encourage downsizing amongst older people, provided these are in the right location for easy access to facilities. There is also a demand for smaller terraced and semi-detached houses suitable for all age groups and with two or three bedrooms.</p> <p>1.6 Broadband and satellite facilities as part of the design for all tenures should be standard to support.</p> <p>1.7 All new properties need to have high levels of energy efficiency.</p> <p>1.8 Studio and bedsit style accommodation is not in high demand.</p>
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	<p>2. Choice Based Lettings Information:</p> <p>2.1 The Council's Choice Based Lettings system currently has circa 1003 applicants registered for housing in Mid Suffolk; at May 16, 25 applicants are registered as seeking accommodation in Thurston. This site is a S106 planning obligation site therefore affordable housing will be to meet district wide need hence the 1003 applicants registered is the figure to note.</p> <p>3. Recommended Affordable Housing Mix:</p> <p>3.1 It is noted that this application proposes 35% affordable housing which is welcomed. 35% affordable housing on this proposal based on 175 units equates to 61 AH units.</p> <p>3.2 The following mix is recommended:</p> <p>Affordable Rent Tenancy:</p> <ul style="list-style-type: none"> • 14 x 1b 2p flat = 50sqm • 8 x 1b 2p bungalow = 50sqm • 18 x 2b 4p house = 79sqm • 5 x 3b 6p house = 95sqm • 1 x 4b 7p house = 115sqm <p>Shared Ownership:</p> <ul style="list-style-type: none"> • 10 x 2b 4p house = 79sqm • 5 x 3b 5p house = 93sqm <p>(Recommended nationally described space standards.)</p> <p>4. Other requirements for affordable homes:</p> <ul style="list-style-type: none"> • Properties must be built to current Homes and Communities Agency Design and Quality and Lifetime-Homes standards • The council is granted 100% nomination rights to all the affordable units in perpetuity
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		<ul style="list-style-type: none"> • The Shared Ownership properties must have an 80% stair casing bar. • The Council will not support a bid for Homes & Communities Agency grant funding on the affordable homes delivered as part of an open market development. Therefore the affordable units on that part of the site must be delivered grant free • The location and phasing of the affordable housing units must be agreed with the Council to ensure they are integrated within the proposed development according to current best practice • On larger sites the affordable housing should not be placed in groups of more than 15 units • Adequate parking provision is made for the affordable housing units • It is preferred that the affordable units are transferred to one of Mid Suffolk's partner Registered Providers – please see www.midsuffolk.gov.uk under Housing and Affordable Housing for full details. • AH dwellings must be tenure blind. <p>5. Open Market Homes Mix:</p> <p>There is a strong need for homes more suited to the over 55 age bracket within the district and the supply of single storey dwellings or 1.5 storeys has been very limited over the last 10 years in the locality. There is growing evidence that housebuilders need to address the demand from older people who are looking to downsize or right size and still remain in their local communities. Consideration should therefore be given to the inclusion of a number of bungalows/chalet bungalows to accommodate over 55's. It is recommended that smaller house units,</p>
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		(majority 1 and 2 beds), 3 beds and a small element of 4 beds would provide a balanced mix of housing on this scheme. A small number of flats would also be recommended.
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	

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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
Suffolk
IP6 8DL

October 7th 2016

Dear Mr. Isbell,

Proposal: Outline Planning Application (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 and Norton Road

Location: Land to the South of Norton Road, Thurston

Application Number: 2797/16

The Parish Council writes further to the letter dated 12th August 2016 from Armstrong Rigg Planning on behalf of its client Hopkins Homes in response to the letter of objection from the Parish Council relating to the above planning application.

In its response, Hopkins Homes (via Armstrong Rigg Planning) make reference to a number of comments made by the Parish Council which for ease are repeated in bold with the Parish Council's response shown below:

"The site is in the countryside outside the settlement boundary and would result in dwellings that are visually, physically and functionally isolated from the facilities and services offered by Thurston."

The letter further states that:

"The Parish Council provides no acknowledgement that further housing allocations and the release of greenfield land will be necessary in Thurston (as the largest of the

Key Service Centres) in the context of District's shortfall in housing land supply and in order to contribute towards meeting local housing needs. No reference is made to the emerging Thurston Neighbourhood Plan which is in the process of assessing the suitability of greenfield sites adjoining the settlement boundary for development and that the site forms one of only three of the nineteen sites assessed to have scored positively in this respect"

The Parish Council's response is as follows:

1. The Parish Council, until the Order for the Neighbourhood Plan is laid, is only able to respond to current planning applications in line with policies set out in the Mid Suffolk Local Plan. As defined by Mid Suffolk's Local Plan, Thurston is a Key Service Centre and growth is assumed to be in line with current policy. Policies cor1 (cs1 settlement hierarchy) and cor2 (CS2 development in the countryside and countryside villages) were taken into account in the Council's response to this application. It cannot be disputed that Thurston has a settlement boundary and as such the location of this site is outside of that boundary.
2. The Thurston Neighbourhood Plan was acknowledged in its letter of 12th August; one might think that Armstrong Rigg Planning were attempting to discredit the Parish Council; however, 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. In fact the Neighbourhood Plan Team responded to this application via the Parish Council who fully endorsed the observations and comments made, and time was given to the Neighbourhood Plan Team at the Parish Council Planning Committee Meeting to address their concerns direct to the Parish Council, as witnessed by a representative of Armstrong Rigg Planning. As such the letter from the Parish Council supports that from the Neighbourhood Plan Team acknowledging that the issues raised in the site assessment are so major and fundamental as to override any acknowledgment of the site's "slightly positive" assessment as carried out under the Neighbourhood Plan Team's assessments of those sites submitted under the Parish Housing Land Availability Assessment.
3. The response from Armstrong Rigg Planning is selective in the points being addressed for example it makes no mention of the serious safety concerns associated with Norton Road, both pedestrians and vehicles as raised by the Neighbourhood Plan Team and the Parish Council in their responses. It further makes no acknowledgement that the natural route for travelling to and from the new development will be Sandpit Lane and the impact that this will have on the Thedwastre Road Priority Scheme over the railway bridge and the stop sign/line at the junction of Thurston Road (Pokeridge Corner).

"The proposal is an overdevelopment of the site, fails to address the wishes of the residents of Thurston for all new development to be no more than 50 dwellings and will not provide sufficient space between existing and proposed dwellings"

In response the Parish Council wishes to state:

1. The application covers 11 hectares but given the areas that are required for drainage and the areas set aside for Open Space, by far the majority of which are to the east of the development, the density of housing will be high in the remaining built up area.
2. The letter is factually incorrect and careless in its interpretation of the Neighbourhood Plan's Vision and Draft Objectives. Careful reading of the Neighbourhood Plan's Draft Objectives Document is clear about the wish for 50 dwellings or less in one area. It is

not related to the number of dwellings built at any one time. What the Neighbourhood Plan seeks is discreet areas of housing separated by open space, woodland or other amenity planting.

3. The letter speaks of 'retaining the character of the village'. Please see comments 1.c below as the Parish Council refutes the contention that the proposed development will do this.

"The development fails to protect the intrinsic character of the countryside by the density and mix of properties proposed, will intrude into an area of undeveloped countryside and fails to ensure that it reflects the local character and identity of the surrounding area"

The Parish Council has the following comment to make:

1. The proposed development is not in conformity with current policies as written under Mid Suffolk's Local Plan and as evidenced in Thurston's emerging Neighbourhood Plan:

- a. There is mediocre, minimal attempt to produce a suitable boundary to the development adjacent to the countryside, for example either side of the access road from Norton Road to the proposed development has no planting whatsoever proposed leaving the rear gardens of the road to abut the proposed verge.

- b. The Parish Council stands by its original comment in its letter of 12th August 2016:

"It is felt that the development of 175 dwellings will intrude into an area of currently open, undeveloped, countryside resulting in an encroachment of built development extending beyond the settlement boundary of Thurston. This will harm the character and appearance of this open area and will be contrary to Policy CS5 of the Core Strategy, Policy FC1.1 of the Core Strategy of the Mid Suffolk Core Strategy Focus Review (2012) and saved Policies H13 and H16 of the Mid Suffolk Local Plan. Furthermore it is felt that the development fails to ensure that it reflects the local character and identity of the area immediately surrounding the proposed development and is therefore inconsistent with paragraph 58 of the NPPF."

The Parish Council stands by its view, and the view of the Neighbourhood Plan Team as mentioned in its own response to this application, that even a limited number of 2.5/3 storey development is not a feature of the area immediately adjacent to the site and rather than adding "visual interest and aid legibility" the appearance of such dwellings will be an intrusion and will fail to complement the character of the existing area.

"The application fails to take into account the current road infrastructure and the lack of pedestrian and cycle routes leading from the site to the amenities and schools, fails to give priority to pedestrian and cycle movements, will not allow convenient integration of public transport, fails to demonstrate that it has considered safe and suitable access points and the traffic generated will add a further burden to the existing road network".

The Parish Council wishes to state:

1. In its response, Arrnstrong Rigg Planning conveniently omits in its argument the key issues of the unsuitability of the existing road network; for example its omission of the accident black spot of Fishwick Corner by focusing on the near neighbourhood of the proposed development is an indication of the selective,

- partisan nature of the proposal and response.
2. There remains no direct link to National Cycle Route 51, nor adequate pedestrian links to Thurston Community College. The application fails to address the issue of safe crossing points and walkways to the Community College or village services for those accessing the route along Norton Road. Suffolk Constabulary have also expressed reservations at the lack of regard for the speed of traffic on Norton Road and the capability of Sandpit Lane / Thedwastre Road Priority System and the inevitable increase in traffic volume.
 3. Further Suffolk Constabulary doubt the argument of the developer that Church Road is likely to be a preferred route and we would endorse their professional view.

"The development would put a negative strain on education capacity"

As a response the Parish Council would like to state:

1. There remains no substantive plan for the building of a new Primary School indeed there is no real indication that the funding would be available to undertake this project.

Suffolk County Council have stated to the Thurston Neighbourhood Plan Team that:

"We currently forecast to have no surplus places at the catchment Primary School to accommodate children arising, 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 Parish Council is concerned that the situation could be further exacerbated by the indication of the possible relocation of all post 16 students from the current Beyton Sixth Form Centre.

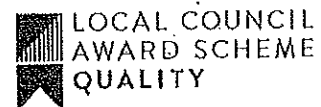
2. Armstrong Rigg Planning on behalf of Hopkins Homes mentions that Ixworth Free School is some 5 miles from the proposed development and has spare capacity. The Parish Council would be interested to know how this is compatible with the assertion that they will "help to promote more sustainable travel".

The Parish Council stands by its detailed observations in its objection letter of 12th August 2016 and would be delighted to speak with representatives of Mid Suffolk Planning Team on this matter.

Yours sincerely,

Victoria S Waples

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





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: Kate Batt
Direct Line: 01284 741227
Email: kate.batt@suffolk.gov.uk
Web: <http://www.suffolk.gov.uk>

Our Ref: 2016_2797
Date: 12th October, 2016

For the Attention of Lisa Evans

Dear Mr Isbell

Planning Application 2797/16 – Land to the South of Norton Road, Thurston: Archaeology

Further to my previous advice (July 2016), SCCAS have now received the results of the geophysical survey undertaken on the site. Having reviewed the available evidence in light of this new information, the site possesses archaeological potential, but is unlikely to contain heritage assets of such extent or importance as to represent a significant constraint on the principal of development. Therefore in this instance, I am content that there is sufficient information to determine the proposed housing site as an Outline Application.

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 each phase or part of site (as submitted under reserved matters) until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation, for that phase or part of site, 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 within each phase or part of site (as submitted under reserved matters) until the site investigation and post investigation assessment has been completed for that phase or part of site, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation for that phase or part of site 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 (5% sample by area) will be required to establish the potential of the site, before approval of layout and drainage under reserved matters, and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

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,

Kate Batt BSc (hons)

Senior Archaeological Officer
Conservation Team

From: Lisa Evans
Sent: 14 December 2016 14:51
To: BMSDC Planning Area Team Yellow
Subject: FW: Reconsultation on Planning Application 2797/16 Updated LVIA

Can this be logged as reconsultation on 2797/16 pls

From: Phil Watson
Sent: 14 October 2016 14:38
To: Lisa Evans
Subject: RE: Reconsultation on Planning Application 2797/16 Updated LVIA

Dear Lisa,

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Re-consultation on Planning Application 2797/16 Updated LVIA

I note the changes made by the applicant in the revised version of the LVIA to ensure that it assesses the proposal as set out on the revised drawing Thur 01/Rev A. On that basis I have no further comments on this matter in addition to those set out in my letter to you of the 04/10/16.

Best regards

Phillip Watson CEnv MIAgrE

Senior Landscape Officer
Natural & Historic Environment Team - Strategic Development
Resource Management
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Your Ref: MS/2797/16
Our Ref: 570\CON\2461\16
Date: 27th October 2016
Highways Enquiries to: christopher.fish@suffolk.gov.uk



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

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

For the Attention of: Lisa Evans

Dear Lisa,

**TOWN AND COUNTRY PLANNING ACT 1990
CONSULTATION RETURN MS/2797/16**

PROPOSAL: Outline Planning Application (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 and Norton Road

LOCATION: Land To The South Of, Norton Road, Thurston, IP31 3QH

ROAD CLASS:

Notice is hereby given that the County Council as Highways Authority recommends that permission be refused for the following reasons:

The proposed access from Norton Road would not be safe for vehicles and an acceptable pedestrian footway cannot be constructed without narrowing Norton Road to the detriment of traffic flow such that safe pedestrian access cannot be achieved either. This is contrary to National Planning Policy Framework paragraph 32.

Comment:

NPPF paragraph 32 states: ... *Plans and decisions should take account of whether:*

- (1) the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;*
- (2) safe and suitable access to the site can be achieved for all people; and*
- (3) improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.*

Taking each point in turn:

- (1) Footway with pedestrian ramps are proposed giving access to Sandpit Road from which pedestrian access to the rest of Thurston may be gained. In addition, pedestrian access can be gained from Church Road via a public footpath. This route would give access to the primary school. If the above recommendation was different, it would also be recommended that a footway with street lighting be provided along Church Road to link to the footpath leading to the primary school and open space.

Drawing IP15/127/11/SK04 shows the footway. Improvements to the surfacing of the footpath (Thurston Public Footpath 6) to make it useable all year should also be secured. This is directly relevant to the development, as children would not be expected to use this length of Church Road otherwise.

Access by cycle can be achieved on-carriageway; further off-carriageway improvements can be secured within the site.

Bus services run between stop on Sandpit Road on the site frontage to Bury St Edmunds and Stowmarket making this a potential alternative to using private motor cars. Appendix F of the Transport Assessment shows two stops suitably located with raised easy-access kerbs, hardstanding (northbound) and bus shelters. These improvements are necessary for the development and it is appropriate to secure them via a S106 planning obligation. In addition, further consideration should be given to localised widening of the carriageway (1/2 width layby on the west side) to facilitate the passing of buses. A pair of pedestrian ramps between the access and the stops to facilitate access the stops from the site should be provided.

Rail services (generally hourly) are accessible on foot from the site to major employment destinations and to the wider rail network. It was noted that the cycle storage provision at the station was limited.

(2) The application shows that visibility splays of 2.4m by 90m along Norton Road in each direction can be provided for the new access. It also identifies the location of the 30mph limit within the splays and that 'this will be relocated by the County Council'. The County Council has a speed limit policy but it is not possible to provide any assurance that a proposed revision to the 30mph speed limit east long Norton Road would be agreed, hence the objection to the application.

In addition, no drawings have been submitted showing that the provision of an adequate footway is feasible to directly serve the development from Norton Road. This situation is not, therefore, considered to be safe for all. It is not possible to recommend a condition that would address this.

Satisfactory access can be achieved, however, from Sandpit Road. Therefore, I could recommend conditions and S106 obligations if the access from Norton Road were to be removed from the proposal. Drawing IP15_12711SK002 Rev. A showing the site access and visibility splay from Sandpit Road is acceptable in principle.

The Suffolk Design Guide (para. 3.3.8) says, '*For major access roads serving more than 150 and up to 300 dwellings... (b) that where only one point of access is available the road layout should form a circuit and there should be the shortest practicable connection between this circuit and the point of access. This should always form the stem of a T-junction usually with a local distributor road.*'

Manual for Streets para. 6.7.3 notes that fire services assess the risk of obstruction of a single access and it is recommended that Suffolk Fire and Rescue are consulted on this possible amendment. Alternative internal layouts that would guard against such risk and allow for maintenance of the road are possible given the dimensions of the site.

(3) Manual for Streets recommends a minimum footway width of 2m, which is entirely reasonable. The length of footway that would be required on Norton Road would be approximately 130m. There is clearly insufficient verge on the south side to provide this footway without impinging significantly on the carriageway width. There is sufficient with on the north side except critically near the junction with Meadow Lane, where the verge is barely 1m adjacent to a ditch. It is also noted that pedestrians would need to cross twice in a relatively short length, which would lead more people to walk in the carriageway (especially if they're accessing the public house along that length). Along with the deficient visibility splays for vehicular access this would constitute a severe residual cumulative impacts in terms of road safety risks.

Given the increase in pedestrian use of the existing footway along Norton Road that this development would bring improvements for crossing Station Hill are warranted. It may be appropriate to establish home zones within the development, as encouraged by NPPF paragraph 35.

NPPF para. 36 says, 'A key tool to facilitate this [the objectives of para. 35] will be a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan.'

Travel Plan (comments based on the Interim Residential Travel Plan (IRTP) dated 21st June 2016).

The Travel Plan has identified a 10% modal shift target in favour of sustainable transport, which would be sufficient for a development of this size and location. However further work will be required to the Travel Plan content to ensure the 10% modal shift target can be achieved.

The IRTP includes some good baseline data that provides a breakdown by mode of travel to the most popular employment destinations, based on the existing residents that live within the Thurston area. The remainder of the Travel Plan, however, has not referred to this baseline data regarding the objectives, targets, and measures! For example, the measures to increase the uptake of sustainable travel are going to differ considerably from residents that commute locally to residents that commute to Bury St Edmunds, Stowmarket or Ipswich. Therefore, some active travel measures should be implemented for local commuters, and measures to promote public transport and car sharing for longer distance commuters. Also a multi-modal voucher to the value of two monthly rail season tickets to Bury St Edmunds, or bus tickets or cycle voucher of equivalent value should be offered to each dwelling to further incentivise sustainable travel.

There will need to be some content included regarding potential additional measures in the event the 10% modal shift is not achieved. Further examples of how the Travel Plan Coordinator will market the Travel Plan after the dwellings have been occupied will also must be included, as the welcome packs and website are unlikely to maintain resident interest without further intervention and engagement from the Travel Plan Coordinator. Other Residential Travel Plans have used 'fun days' and frequent resident newsletters to maintain the Travel Plan engagement post occupation.

The implementation of the Travel Plan will need to be revised to commence from occupation for a minimum period of five years, or one year after occupation of the final dwelling, whichever is longest. This is so that a reasonable average period of travel plan support is provided for the development. The annual monitoring of the Travel Plan must reflect this minimum implementation period as well. The implementation of the Travel Plan should also be summarised in an Action Plan, that details the times and responsibilities throughout the duration of the Travel Plan.

Finally, there will need to be further cross-referencing between the Travel Plan and the supporting Transport Assessment in accordance with the overarching principles of the 2014 Planning Practice guidance, as there is very little reference to the Travel Plan being part of the highway mitigation in the supporting Transport Assessment.

The applicant should be required to submit a revised travel plan that takes into account the comments raised above prior to the determination of this application.

The requirement for a Travel Plan complies with National Planning Policy Framework, notably paragraphs 32, 34, 35, 36 and 37. In addition, a good quality travel plan will also support Core Strategy Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

To fully secure the benefits of the travel plan the following Section 106 contributions and elements of the Travel Plan need to be secured:

- Travel Plan Evaluation and Support Contribution - £1,000 per annum for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation of the travel plan, which may result in the failure of the travel plan to mitigate the highway impact of this development.

- Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 per dwelling – based on the estimated cost of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.
- Approval and full implementation of the Interim Residential Travel Plan
- Provision of an approved welcome pack to each resident on first occupation
- Approval and full implementation of the Full Residential Travel Plan on occupation of the 100th dwelling.
- Monitoring the Travel Plans' impacts for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

Other matters:

Full wording for the proposed Section 106 obligations and suitable conditions covering, amongst other matters, access layout, construction management strategy drainage, estate road provision, parking, and visibility splays, can be provided following revision of the application or in support of any subsequent appeal.

Concerns have been raised about the assessment of road safety impacts in the Transport Assessment. While no clusters are shown it is requested that full details are provided for inspection.

The illustrative masterplan suggests a tree lined avenue. The County Council's Highways Operations advice is that new tree provision in general should be in appropriate ground conditions in locations that have the potential for the trees to flourish whilst requiring the minimum amount of root protection/containment to prevent damage to highway and utility infrastructure. This would preferably be in non-highway locations (such as local amenity, landscaped areas). Tree locations must also accord with the Highways Act 1980; section 141 says, '*no tree or shrub shall be planted in a made-up carriageway, or within 15 feet [4.52m] from the centre of a made-up carriageway*'. Given this, trees in prospectively adoptable highways should be limited to wide verges away from all metalled highway surfaces or utility apparatus. In addition, street lighting should not be unduly compromised by trees and careful design is required to do so.

Yours sincerely,

Christopher Fish
Senior Highway Development Control Engineer
Strategic Development – Resource Management

<https://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Roads%20and%20Pavements/2015.07.23-Speed-Limit-Policy.pdf>

Your Ref: MS/2797/16
Our Ref: 570\CON\2461\16
Date: 27th October 2016
Highways Enquiries to: christopher.fish@suffolk.gov.uk



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Endeavour House, 8 Russell Road, Ipswich, Suffolk IP1 2BX
www.suffolk.gov.uk

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Travel Plan (comments based on the Interim Residential Travel Plan (IRTP) dated 21st June 2016).

The Travel Plan has identified a 10% modal shift target in favour of sustainable transport, which would be sufficient for a development of this size and location. However further work will be required to the Travel Plan content to ensure the 10% modal shift target can be achieved.

The IRTP includes some good baseline data that provides a breakdown by mode of travel to the most popular employment destinations, based on the existing residents that live within the Thurston area. The remainder of the Travel Plan, however, has not referred to this baseline data regarding the objectives, targets, and measures. For example, the measures to increase the uptake of sustainable travel are going to differ considerably from residents that commute locally to residents that commute to Bury St Edmunds, Stowmarket or Ipswich. Therefore, some active travel measures should be implemented for local commuters, and measures to promote public transport and car sharing for longer distance commuters. Also a multi-modal voucher to the value of two monthly rail season tickets to Bury St Edmunds, or bus tickets or cycle voucher of equivalent value should be offered to each dwelling to further incentivise sustainable travel.

There will need to be some content included regarding potential additional measures in the event the 10% modal shift is not achieved. Further examples of how the Travel Plan Coordinator will market the Travel Plan after the dwellings have been occupied will also must be included, as the welcome packs and website are unlikely to maintain resident interest without further intervention and engagement from the Travel Plan Coordinator. Other Residential Travel Plans have used 'fun days' and frequent resident newsletters to maintain the Travel Plan engagement post occupation.

The implementation of the Travel Plan will need to be revised to commence from occupation for a minimum period of five years, or one year after occupation of the final dwelling, whichever is longest. This is so that a reasonable average period of travel plan support is provided for the development. The annual monitoring of the Travel Plan must reflect this minimum implementation period as well. The implementation of the Travel Plan should also be summarised in an Action Plan, that details the times and responsibilities throughout the duration of the Travel Plan.

Finally, there will need to be further cross-referencing between the Travel Plan and the supporting Transport Assessment in accordance with the overarching principles of the 2014 Planning Practice guidance, as there is very little reference to the Travel Plan being part of the highway mitigation in the supporting Transport Assessment.

The applicant should be required to submit a revised travel plan that takes into account the comments raised above prior to the determination of this application.

The requirement for a Travel Plan complies with National Planning Policy Framework, notably paragraphs 32, 34, 35, 36 and 37. In addition, a good quality travel plan will also support Core Strategy Objectives SO3 and SO6 of the Mid Suffolk Core Strategy Development Plan Document (2008) and Core Strategy Focused Review (2012).

To fully secure the benefits of the travel plan the following Section 106 contributions and elements of the Travel Plan need to be secured:

- Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation of the travel plan, which may result in the failure of the travel plan to mitigate the highway impact of this development.

- Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 per dwelling – based on the estimated cost of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.
- Approval and full implementation of the Interim Residential Travel Plan
- Provision of an approved welcome pack to each resident on first occupation
- Approval and full implementation of the Full Residential Travel Plan on occupation of the 100th dwelling.
- Monitoring the 'Travel Plans' impacts for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest
- Securing remedial travel plan measures if the agreed travel plan targets are not achieved

Other matters:

Full wording for the proposed Section 106 obligations and suitable conditions covering, amongst other matters, access layout, construction management strategy drainage, estate road provision, parking, and visibility splays, can be provided following revision of the application or in support of any subsequent appeal.

Concerns have been raised about the assessment of road safety impacts in the Transport Assessment. While no clusters are shown it is requested that full details are provided for inspection.

The illustrative masterplan suggests a tree lined avenue. The County Council's Highways Operations advice is that new tree provision in general should be in appropriate ground conditions in locations that have the potential for the trees to flourish whilst requiring the minimum amount of root protection/containment to prevent damage to highway and utility infrastructure. This would preferably be in non-highway locations (such as local amenity, landscaped areas). Tree locations must also accord with the Highways Act 1980; section 141 says, '*no tree or shrub shall be planted in a made-up carriageway, or within 15 feet [4.52m] from the centre of a made-up carriageway*'. Given this, trees in prospectively adoptable highways should be limited to wide verges away from all metalled highway surfaces or utility apparatus. In addition, street lighting should not be unduly compromised by trees and careful design is required to do so.

Yours sincerely,

Christopher Fish
Senior Highway Development Control Engineer
Strategic Development – Resource Management

<https://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Roads%20and%20Pavements/2015.07.23-Speed-Limit-Policy.pdf>



Historic England

EAST OF ENGLAND OFFICE

Ms Lisa Evans
Mid Suffolk District Council
131 High Street
Needham Market
Suffolk
IP6 8DL

Direct Dial: 01223 582721

Our ref: P00519508

2 November 2016

Dear Ms Evans

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

**LAND TO THE SOUTH OF NORTON ROAD, THURSTON IP31 3QH
Application No 2797/16**

We have received amended proposals for the above scheme.

Summary

This application proposes a large residential development on farmland at the northern edge of Thurston village. This land sits between the village and the grade II* listed Manor Farm House with the parish church of St Peter to the south east. An assessment of the significance of the house and the impact on it has now been submitted as required by the NPPF.

Historic England Advice

In our earlier advice we noted the importance of Manor Farm House, a grade II* listed building. The Heritage Statement submitted in support of the application has provided further helpful detail of the architectural significance of Manor Farm House. It has also established the link between the building and farming (paragraph 3.27) and that while the immediate grounds are quite enclosed (3.31) it stands in a predominantly agrarian landscape (3.28). The Statement correctly concludes that this landscape contributes to the significance of the listed building.

The Statement acknowledges that there is a 'minor degree of inter-visibility' between the house and this landscape, including the development site. In addition the site can be seen from the drive immediately in front of the house. The applicant's consultant has not accessed the house to see if views might be had from principle rooms and the balustraded deck on top of the roof may well have been designed to be accessed and the scene surveyed, including the application site.

We conclude that as the proposed development would bring modern building



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



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significantly closer to the listed building and affecting the agricultural character of the landscape would diminish the way in which it contributes to the setting of Manor Farm House. Since the application was first submitted we have also had the opportunity to visit the site. As well as the intervisibility between Manor Farm House and the site we noted that the tower of the parish church of St Peter is more prominent in views from the north west across the application site than anticipated although planting around the existing dwellings between the two does reduce the visual impact.

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). The National Planning Policy Framework (NPPF) builds upon the 1990 Act. It identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings can be harmed by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favorably.

Having reviewed the proposals in light of the recently submitted assessment and visited the site we are of the view that the proposed development could result in a degree of harm to the significance of Manor Farm House and also the parish church of St Peter in terms of the NPPF paragraphs 132 and 134. Paragraph 134 asks planning authorities to weigh any public benefit delivered by developments against such harm. The proposed housing might deliver such a benefit and the Council should consider this when seeking the 'clear and convincing' justification for the harm required by the NPPF. We would note that the area to be left undeveloped in the north eastern corner of the application site could be beneficial to the setting of Manor Farm House and suggest that a similar landscaping belt along the whole northern edge of the site might also mitigate, but not wholly remove the harmful impact.

Recommendation

We consider that the proposed development in the vicinity of the grade II* listed Manor Farm House and the parish church of St Peter could result in harm to the significance of the historic buildings in terms of paragraph 132 of the NPPF. As required by paragraph 134 the Council should weigh any public benefit delivered by the development against such harm when seeking the 'clear and convincing' justification required by the NPPF. We would note that the area to be left undeveloped in the north eastern corner of the site could be beneficial to the setting of Manor Farm House is.



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suitably planted and suggest that a similar landscaping belt along the whole northern edge of the site might also mitigate, but not wholly remove the harmful impact.

Yours sincerely



David Eve

Inspector of Historic Buildings and Areas

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

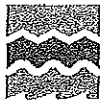


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From: Eve, David [mailto:David.Eve@HistoricEngland.org.uk]
Sent: 09 November 2016 20:29
To: Lisa Evans; Planning Admin
Subject: 11/08/2916 Land South of Norton Rd., Thurston (our ref. P519508)

Dear Ms Evans

Thank you for consulting us on the development plan framework and site location plan submitted in support of the above application. We have no comments to make on these and refer you to our letters dated 11th August and 3rd November this year.

Sincerely

David Eve



Historic England

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David Eve
Inspector of Historic and Buildings and Areas (Norfolk, Suffolk and Bedfordshire)
National Planning and Conservation Department
Tel: 012223 582721

Historic England | Brooklands | [24 Brooklands Avenue](#) | [Cambridge](#) | CB2 8BU.
www.historicengland.org.uk

From: Nathan Pittam
Sent: 09 November 2016 15:25
To: Planning Admin
Subject: 2797/16/OUT. EH - Land Contamination.

M3: 181652
2797/16/OUT. EH - Land Contamination.
Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Outline Planning Application (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 ...

Many thanks for your request for comments in relation to the revised plans for the above application. I can confirm that I have no objections to the proposed changes but would maintain my recommendation for the condition as outlined in my email of 8th August 2016 (see below).

Regards

Nathan

From: Nathan Pittam
Sent: 08 August 2016 11:59
To: Planning Admin
Subject: 2797/16/OUT. EH - Land Contamination.

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2797/16/OUT. EH - Land Contamination.
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Many thanks for your request for comments in relation to the above application. I am happy to confirm that I have no in principle objection to the development from the perspective of land contamination provided that the attached condition is included with any permission that may be granted for the site.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715 or 01473 826637
w: www.babergh.gov.uk www.midsuffolk.gov.uk

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Nathan Pittam BSc, (Hons.) PhD
Senior Environmental Management Officer
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From: Kate Batt
Sent: 10 November 2016 16:56
To: Lisa Evans; Planning Admin
Subject: RE: Reconsultation on Planning Application 2797/16

Dear Lisa,

The further information/revised plans recently submitted do not alter the archaeological implications of the proposed development. SCCAS advice, therefore, remains unchanged from that given on 12/10/16 (see attached). Please do not hesitate to contact me should you require further information or advice.

Kind regards, Kate

Kate Batt (BSc hons)
Senior Archaeology Officer

Suffolk County Council Archaeological Service,
Bury Resource Centre,
Hollow Road,
Bury St Edmunds,
IP32 7AY

Tel: 01284 741227
Mob: 07734478873

Website: <http://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/>
Heritage Explorer: <https://heritage.suffolk.gov.uk/>
Heritage Gateway: <http://www.heritagegateway.org.uk/Gateway/>

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 14 November 2016 09:52
To: Planning Admin
Subject: 2797/16 - Consultation Response

Application ref: 2797/16
Our ref: 200992

Dear Sir/Madam,

Natural England has no comments to make on this application.

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

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

Yours faithfully,

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

Your ref: 2797/16
Our ref: 00045522
Date: 14 November 2016
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Lisa,

Re: Thurston, land south of Norton Road

I refer to the planning application reconsultation for the above scheme in Mid Suffolk. Suffolk County Council has previously provided a consultation response by way of letter dated 16 August 2016 and the contribution requirements are still valid.

I have copied colleagues from SCC Floods team, Highway Network Management and Archaeology into this letter who will contact you separately with any further responses.

Yours sincerely,

P J Freer

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

cc Neil McManus, SCC
RM Floods Team, SCC
Rachael Abraham, SCC
Christopher Fish, SCC

MID SUFFOLK DISTRICT COUNCIL

MEMORANDUM

TO: Lisa Evans, Development Control Team

FROM: Joanna Hart, Environmental Protection Team

DATE: 17.11.2016

YOUR REF: 2797/16/OUT

SUBJECT: Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Outline Planning Application (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 and Norton Road.

Please find below my comments regarding 'Environmental Health - Other issues' only.

Thank you for your re-consultation on the above application.

My comments submitted in my memo of 12th August 2016 are still relevant.

I note that the development framework plan identifies an 'informal kickabout area' in the centre of the site. I do have some concerns about the siting of this area which could lead to the potential for loss of amenity due to noise at nearby properties. If it is not possible to relocate this area, I would suggest that it will require careful design in terms of any features/equipment provided (such as goals) and lighting.

Kind regards
Joanna Hart
Senior Environmental Protection Officer



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 MS/2797/16

SITE: 175 New Homes for Land to the south of Norton Road, Thurston, IP31 3QH

Applicant:

Planning Officer: Ms Lisa Evans

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 Ms Lisa Evans

Thank you for allowing me to provide an input for the above Outline Planning Application for the proposed development of 175 residential properties at land to the south of Norton road, Thurston, IP31 3QH.

At present I believe I do not have enough information to fully comment on this proposal. However, I wish to highlight in its current form, I have serious concerns that the outlined application is too permeable and could lead to a higher generation of crime within the area.

Permeability is often seen as positive feature within a development but can make controlling crime very difficult, as it allows easy intrusion by potential offenders and although well used routes can provide welcome opportunity for informal surveillance, this is not so at all times of the day and night.

As a result, I ask the planners to rethink the amount of footpaths and cycle routes that would, if implemented, leave the area too open for an Offender to use.

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.

Section 17 outlines the responsibilities placed on local authorities to prevent crime and dis-order,

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.

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

An early input at the detailed 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.

- 1.1 vehicular and pedestrian routes should be designed to ensure that they are visually open, direct, well used and should not undermine the defensible space of neighbourhoods. Design features can help to identify the acceptable routes through a development thereby encouraging their use and in doing so enhance the feeling of safety.
- 1.2 There are advantages in some road layout patterns over others, especially where the pattern frustrates the searching behaviour of the criminal and his need to escape. Whilst it is accepted that through routes will be included in developments such as this, the designers must ensure that the security of the development is not compromised by excessive permeability, for instance allowing an offender legitimate criminal access to the rear or side boundaries of a dwelling.
- 1.3 Developments that enhance the passive surveillance of the area by the residents from their homes and which incorporate high levels of street activity have both been proven to influence a criminal's behaviour and deflect them elsewhere.
- 1.4 To the planners credit the proposed plan caters for the majority of properties to look onto one another as preferred by police Secure By Design principles. It is important that the boundary between public and private areas is clearly indicated. Each building needs two faces: a front onto public space for the most public activities and a back where the most private activities take place. If this principle is applied consistently, streets will be overlooked by building fronts improving community interaction and offering surveillance that creates a safer feeling for residents and passers-by.

2. General layout of the proposed plan

- 2.1 For the majority of housing developments, it will be desirable for dwelling frontages to be open to view, so walls, fences and hedges will need to be kept low or alternatively feature a combination of wall (maximum height 1 metre) and railings or timber picket fence.
- 2.2 I would also like to see that properties will have gable end windows that look onto public spaces, which is a police preferred preference of design that allows natural surveillance of the area to reduce the risk of graffiti, other forms of criminal damage, or inappropriate loitering. Where blank gable walls are unavoidable there should be a buffer zone, using either a 1.2 – 1.4m railing (with an access gate) or a 1m mature height hedge with high thorn content.
- 2.3 I would be interested to know how the rear gardens will be secured. I would refer the developers to SBD 2016, page 18 on "Dwelling Boundaries", which outlines the importance of how the boundary between public and private areas should be clearly indicated. I would

also prefer to obtain more details on how the boundary of the new properties will interface with the current homes on Sand Pit Lane, Sand Pit Drive, Victoria Close and Oakey Field Road.

2.4 There are five main reasons for providing a perimeter boundary fence:

- a) To mark a boundary to make it obvious what is private and public property.
- b) Provide safety for employers and employees.
- c) Prevent casual intrusion by trespassers.
- d) Prevent casual intrusion onto the site by criminals.
- e) Reduce the wholesale removal of property from the site by thieves.

2.5 The gates to the side or rear of dwellings that provide access to rear gardens, should be of robust construction and be the same height of the fence line at a minimum height of 1.8m and be capable of being locked (operable by key from both sides of the gate and a good quality mortise lock is preferred). SBD 2016, Pages 18-19, Paras 10.3 – 10.5.12 refers.

3.0 Footpaths

3.1 The balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars. We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community. There is no blanket approach, site specifics apply, based on the crime rate and local context. Research from across the United Kingdom shows that 85% of house burglaries occur at the rear of a property.

3.2 Routes for pedestrians, cyclists and vehicles should be integrated to provide a network of supervised areas to reduce crime along with Anti-Social Behaviour. Where a suggested footpath is unavoidable, such as along a right of way, designers should consider making the footpath a focus of the development and ensure that they are straight as possible, preferably at least 3m across to allow people to pass one another without infringing on personal space and accommodate passing wheelchairs, cyclists and mobility vehicles with low growing and regularly maintained vegetation on either side. If possible it would assist for that area to also be well lit. (SBD 2016, pages 14-17, at Paras 8.1-8.19).

3.3 Footpaths that include lighting should be lit to relevant levels as defined by BS 5489:2013. I have serious concerns that if the current footpath, which is to be retained and made an integral part of the boundary of the development is not properly lit, this route will become a generator for crime to occur.

4. Lighting

4.1 I cannot comment on the lighting as there are no details submitted on the plans. However, I would recommend photocell operated wall mounted lighting at the front of all household dwellings; (on a dusk to dawn light timer) complete with a compact fluorescent lamp and wired through a switched spur to allow for manual override. I would also appreciate viewing a "Lux" lighting plan of the proposed site.

4.2 Lighting should conform to the requirements of BS 5489:2013. A luminaire that produces a white light source (Ra>59 on the colour rendering index) should be specified but luminaires that exceed 80 on the colour rendering index are preferred.

5. Car Parking

- 5.1 The layout of the plans allows natural surveillance of the parking areas, which is commendable.
- 5.2 Communal parking facilities must be lit to the relevant levels as recommended by BS5489:2013 and a certificate of compliance provided. See section 16 SBD Homes 2016 for the specific lighting requirements as well as recommendations for communal parking areas.

6. Communal Areas/ Public Open Space

- 6.1 **Communal Areas/Public Open Space:** I note that provision has been looked at to provide at least two "Public Open Space areas", allotments, a proposed football pitch area and a Gym Trail. I would recommend metal knee-rail hoop fencing for the perimeter of each communal recreation area. Section 9, SBD 2016, provides further details around Communal areas in order to reduce the potential for ASB and Criminal Damage issues.
- 6.2 Play equipment 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.
- 6.3 Gymnasium/fitness equipment needs to be properly spaced 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.
- 6.4 **Gates:** As a general principle these should take 4-8 seconds to close from a 90 degree opening position. To prevent animal access they should be outward opening.
- 6.5 **Fences:** Should pass the entrapment requirements, i.e. less than 89mm between vertical palings, no horizontal access and hoop tops should pass the head and neck probe.
- 6.6 **Seats:** These should be placed at least 300mm from the fence to prevent potential entrapment between the bench and the fence.
- 6.7 **Pathways:** Erosion resisting pathways should be provided into the site at least to the seating areas.
- 6.8 **All litter bins should be of a fire retardant material.**
- 6.9 The Fields Trust Planning and Design for Outdoor Sport and Play Introduced 2008 and The Association of Play Industries Adult Outdoor fitness Equipment Standards also offer further guidance.

7. Further Recommendations in General

- 7.1 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.
- 7.2 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).
- 7.3 I note the area and boundary will be landscaped and I would be interested to note the full

details for such landscaping. I strongly recommend around the boundary areas, planting defensive vegetation, such as Hawthorn, Berberis or Pyrocantha to deter any would be offenders and that the height of such boundaries should be at least 1.8m high.

8. Conclusion

- 8.1 I strongly advise the development planners adopt the ADQ guide lines and Secure by Design (SBD) principles for a secure development.
- 8.2 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
- 8.3 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/>
- 8.4 **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.
- 8.5 It is now widely accepted a key strand in the design of a 'sustainable' development is its resistance to crime and anti-social behaviour by introducing appropriate design features that enable natural surveillance and create a sense of ownership and responsibility for every part of that development.

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.

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.

The applicant can also enter into a **pre-build agreement** and make use of the Award in any marketing or promotion of the development. The current "New Homes 2016" guide and application

forms are available from www.securedbydesign.com which explains all the crime reduction elements of the scheme.

In conclusion I would encourage designers to look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that any would be offender will stand out in a well-designed community. I am happy to assist with this as the detailed design progresses.

In regard to a play area consideration should be given regarding usage by non-age appropriate people, (i.e. older children) for which the play area would not be designed. Teenage youths will always gather somewhere, often it is in a play park as it is considered an out of the way area away from parents. The best way to address such problems is to find alternative areas for such groups. One tried and tested method is providing a youth shelter.

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

Yours sincerely



Phil Kemp

Designing Out Crime Officer
Western and Southern Areas
Suffolk Constabulary
Raynegate Street
Bury St Edmunds
Suffolk
IP33 2AP

From: RM PROW Planning
Sent: 22 November 2016 12:58
To: Planning Admin
Subject: RE: Reconsultation on Planning Application 2797/16

For The Attention of: Lisa Evans

Public Rights of Way Response

Thank you for the additional correspondence in relation to the above planning application.

Please accept this email as confirmation that we have no further comment to make in addition to our original response dated 9/8/16.

Regards

Jackie Gillis
Rights of Way Support Officer
Countryside 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

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

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



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

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

To: Mid Suffolk District Council

CC: growthandplanning@highwaysengland.co.uk

Council's Reference: 2797/16

Referring to the planning application referenced above, dated 10 November 2016, application for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments and vehicular access from Sandpit Lane and Norton Road, Land to the South of Norton Road Thurston IP31 3QH, 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: 25 November 2016

Name: David Abbott

Position: Asset Manager

Highways England:
Woodlands, Manton Lane
Bedford MK41 7LW

david.abbott@highwaysengland.co.uk

NEIGHBOURHOOD PLAN TEAM

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



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

22nd November 2016

Dear Cllr. Robinson,

Re: Re-consultation on the Outline Planning Application – 2797/16 – (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 and Norton Road @ land to the South of Norton Road, Thurston.

Thank you for allowing the Neighbourhood Plan Team to comment further on the re-consultation of the above planning application as submitted by the agents acting on behalf of Hopkins Homes. The Neighbourhood Plan Team would like to stand by its concerns as mentioned in its letter of 9th August 2016 and for ease have repeated the relevant points below:

- The Neighbourhood Plan Team would like to state that in accordance with the Parish Council Protocol's for Pre Planning Application Developments – no comments on the suitability of the site for development or how the site performs in relation to others ahead of the site assessment work were made during the attendance of representatives from either Hopkins Homes or their agents at Neighbourhood Plan Meetings and that whilst the applicant had been informed that it could state that they have 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.
- Thurston Parish Council is at a relatively advanced stage in preparing a Neighbourhood Plan and whilst the plan has not yet reached the stage of allocating sites or proposing policies, following consultation with the public and land owners and agents on the site assessments carried out during Summer 2016 it should be afforded some weight in responding to this application. The results of the assessment on land submitted by the agent on behalf of Hopkins Homes under the Neighbourhood Plan Team's Call for Sites of January 2016, under the Parish Housing Land Availability Assessment, has raised a number of issues which the Neighbourhood Plan Team feel are so major and fundamental as to override any acknowledgment of the site's "slightly positive" assessment. Comments raised by the public and the agent following the public consultation on the site assessments have also been incorporated into the process and the revised site assessment overall summary has not changed from that of slightly positive. A copy of this site assessment is attached to this letter.

The Neighbourhood Plan Team has continually consulted with the residents and businesses of Thurston over the past two years and feels that it has followed a clear programme of consultative events which places it in a strong position to be able to reflect the local community and to respond to planning applications that are premature and fail to follow the Neighbourhood Plan Process.

- The Neighbourhood Plan Team would like to state that it is disappointed at the speed at which this and another application have been submitted for new housing in the village. There seems to be a general haste to ensure that each development is the first to submit with little regard for the cumulative impact that each development will have as a whole on the general infrastructure of Thurston which requires

time to evolve and time to absorb new residents and associated growth. There is a general concern that the size of new developments being proposed will result in Thurston losing its 'village feel' and for it to become 'a small town'.

With particular reference to the planning application submitted:

- Generally the Neighbourhood Plan Team feels that the Concept Masterplan is an unimaginative off the shelf design and that it fails to show any respect for the fact that it abuts countryside on one side and an existing housing development on the other. It was felt that the masterplan was more in-keeping with an urban edge of town design than that which would reflect the rural state of Thurston as a village. The Neighbourhood Team is also concerned at the proposal of 2.5 - 3 storey dwellings which are considered not to be in-keeping with the general characteristic of a rural village. The Neighbourhood Plan Team felt that there was also a need for better screening around the edge of the site, along the existing roads in order to ensure that the new development enhanced and protected the existing natural environment, wildlife networks and biodiversity.

Whilst the response from the community engagement process carried out by Engage Planning on behalf of Hopkins Homes reflects the Neighbourhood Plan's findings that the majority of those who have responded to the public consultations wished to see starter homes for local first time buyers; bungalows and 1 - 2 bedroom houses, this is not reflected in the indicative housing size within the Concept Masterplan in the outline planning application submitted. The implication is that size is still to be determined but the Neighbourhood Plan Team would have expected the outline application to have followed the applicant's consultative results.

The Neighbourhood Plan Team is disappointed that within the Concept Masterplan there is little evidence to show that the scheme is set to encourage the development of appropriate housing stock that reflects the needs of current and future residents.

- The Neighbourhood Plan Team would like to reiterate that, whilst it is generally appreciated within the village that as a Key Service Centre and a village on the A14 corridor with a good rail link there will be growth within the village, there is a preference for this growth to be handled sympathetically and on sites of no more than 50 houses. The Neighbourhood Plan Team would have liked to see the Concept Masterplan draw on this preference and to have divided the site into three separate areas using hard and soft landscaping techniques to ensure that the design preserves and enhances the built, natural and historic environment of the local area as well as maintaining and enhancing its distinctive characteristics.
- Within the Interim Residential Travel Plan mention is made of the access to local facilities either via pedestrian access, cycle access, bus services or rail services.

The Neighbourhood Plan Team feels that given the location of the site little reference has been made to the current road infrastructure and the impact that the development will have on the junction of Norton Road and Ixworth Road and Fishwick and Pokeridge Corners for those accessing the A14. The route to the latter is via the single file pinch point at the bridge on Sandpit Lane - Thedwastre Road and then onto the dangerous Pokeridge corner junction. The increase of vehicular movements onto the single exit Sandpit Lane will also impact negatively on this pinch point where there is no pedestrian footpath across the bridge. It is still noted that the crash map produced does not include Fishwick Corner which has a higher proportion of incidences than other areas quoted.

The Neighbourhood Plan Team would respectively draw your attention to its comments above and to the concerns raised by Suffolk Constabulary at the capability of Sandpit Lane / Thedwastre Road Priority System and the inevitable increase in traffic volume from this development onto Sandpit Lane.

It was further agreed that the Neighbourhood Plan Team was concerned that there were no plans to install safe pedestrian footpaths on the development side of Sandpit Lane. The plans indicate that the single entrance road to the development will come straight out onto Sandpit Lane with no pedestrian footpath. The route into the village along Sandpit Lane could be made reasonably safe by providing a short pedestrian footpath and a pedestrian crossing to the other side of the road which would then link to the existing footpath to shops or amenities on the opposite side of the road. Also no reference has been made to the fact that all pavements within and to the development should be made suitable for motorised buggies nor was there any mention of cycle lane provision. The Neighbourhood Plan Team feels that the applicant should consider linking the development with the Sustrans National Route to ensure that there are linked routes for cyclist safety.

There is however a genuine concern at the adverse impact at peak times that the one single entrance onto Sandpit Lane will have on pedestrian and vehicular movements. The Neighbourhood Plan Team

would like to see, as a minimum, this entrance point replicate the splay that was originally proposed for the entrance onto Norton Road thereby allowing safe passage for both pedestrians and vehicles.

The Neighbourhood Plan Team would like to see a comprehensive travel plan which assesses the impact of such a development on the whole road network in Thurston including pedestrian and cycles routes to allow informed opinions to be made.

The Neighbourhood Plan Team was also concerned that whilst it is stated (within the planning overview submission document) that additional residents would also support the sustainability of established bus and rail services, there still needs to be an overall assessment of the impact on the railway station that this and other developments will have on the station/rail network and the fact that car parking is already an issue.

- The Neighbourhood Plan Team would further like to draw to the Parish Council's attention to the impact that such a development will have on the education provision within Thurston. The Team has been informed by Suffolk County Council that Thurston Church of England Primary Academy is currently at capacity (this takes into account current housing commitments only) and that the consequence that any future growth will have must include detailed discussions about infrastructure mitigation. It is also noted that Thurston Community College is also at capacity and that it is unlikely that the school will be supported to grow much bigger than it is now. Given that 200 additional homes by 2031 will yield 50 Primary Pupil Places; 36 Secondary Pupil Places and 8 Secondary 16+ Places, the Neighbourhood Plan Team has concerns that this provision will not be met locally and that there will be a need for pupils to be 'bussed' outside of the village. This unsustainable situation will also have a further negative impact on traffic, bus stops and road congestion within the village.

Armstrong Rigg Planning on behalf of Hopkins Homes has also mentioned in a later submission that Ixworth Free School is some 5 miles from the proposed development and has spare capacity. The Neighbourhood Plan Team would be interested to know how this is compatible with the assertion that this "helps to promote more sustainable travel". As this relates to the provision of education for those above 11+, the Neighbourhood Plan feels that further consideration should be given to the provision of education for those of primary school age.

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

- road safety with particular emphasis on the junctions of Norton Road and Ixworth Road
- road safety issues with particular 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 Sandpit Lane for accessing village facilities as there are no safe crossing points
- impact of the vehicular movements from a single point of entry
- loss of character of the village
- development inappropriate to that of land abutting the countryside
- concern for the amount of development on the site
- village infrastructure particularly education provision and traffic
- type and density of housing mix
- cost of affordable homes for local residents

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

Yours faithfully,

Victoria S Waples

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

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

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
Suffolk
IP6 8DL

November 25th 2016

Dear Mr. Isbell,

Proposal: Re-consultation on the Outline Planning Application (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 and Norton Road

Location: Land to the South of Norton Road, Thurston

Application Number: 2797/16

The Parish Council wishes to place on record that it objects to the revised plans as submitted under planning application 2797/16 for the following reasons, the majority of which were submitted in its letter dated 12th August 2016 but are repeated below for ease:

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

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

Team reports to the Parish Council on a regular basis and all Parish Councillors are fully aware and in agreement with the views of the Neighbourhood Plan Team, some of whom are indeed both Parish Councillors and Neighbourhood Plan members. The Parish Council has received correspondence from the Neighbourhood Plan Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that they are to be included within its submission. As such a copy of that letter should be read in conjunction with this response.

Reasons for objection:

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

It is also felt that the proposal is considered to be an overdevelopment of the site and fails to address the wishes of the views of the residents of Thurston (as expressed in the emerging Thurston Neighbourhood Plan) for all new development to be sited on areas containing no more than 50 dwellings and as such will not incorporate the creation of sufficient open spaces between existing and proposed buildings which will neither maintain nor enhance the character of the village at this particular point. (GP1 – Design and Layout of Development & csfr-fc2 provision and distribution of housing). The Parish Council is also of the view that even a limited number of 2.5/3 storey development is not a feature of the area immediately adjacent to the site and rather than adding "visual interest and aid legibility" the appearance of such dwellings will be an intrusion and will fail to complement the character of the existing area.

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

The Parish Council does not hold with the views expressed in the documents submitted that the application is sympathetic to the countryside in which it is situated and that it fails to protect the intrinsic character of the countryside by the density and mix of properties being proposed. It is felt that the development of 175 dwellings will intrude into an area of currently open, undeveloped, countryside resulting in an encroachment of built development extending beyond the settlement boundary of Thurston. This will harm the character and appearance of this open area and will be contrary to Policy CS5 of the Core Strategy, Policy FC1.1 of the Core Strategy of the Mid Suffolk Core Strategy Focus Review (2012) and saved Policies H13 and H16 of the Mid Suffolk Local Plan. Furthermore it is felt that the development fails to ensure that it reflects the local character and identity of the area immediately surrounding the proposed development and is therefore inconsistent with paragraph 58 of the NPPF.

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

There still remains no direct link to National Cycle Route 51, nor adequate pedestrian crossing points at the junction of Norton Road and Ixworth Road for those wishing to access Thurston Community College and the Library. Given the one entrance the application also fails to address the issue of safe crossing points and access out of the development direct onto Sandpit Lane.

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

The Parish Council feels that the development of the site will not be able to allow for the convenient integration of public transport within the site and that the traffic that will be generated will not be able to be accommodated on the existing road network (CS6 – services and infrastructure). The revised plans make no acknowledgement that the natural route for travelling to and from the new development to the A14 will be down Sandpit Lane onto the narrow Thedwastre Road Priority Scheme over the railway bridge and the stop sign/line at the junction of Thurston Road (Pokeridge Corner). The Parish Council is concerned at the impact that this will have on this junction and is also mindful that Suffolk Constabulary have also expressed reservations at the capability of Sandpit Lane / Thedwastre Road Priority System and the inevitable increase in traffic volume.

Furthermore, the Parish Council raises concerns that there is no provision of pedestrian access from the development to the remainder of the footways within Thurston and concern has been raised that a number of residents will access the Primary School via Sandpit Lane. The Parish Council endorses the recommendation made by Suffolk County Council that pedestrian ramps are proposed to give access to Sandpit Road from which pedestrian access to the rest of Thurston may be gained. If further agrees that whilst a pedestrian access can be gained from Church Road via a public footpath which would give access to the primary school, the route along Church Road, should be lit with street lighting to link to the footpath leading to the primary school and open space.

4. The Parish Council has concerns over the single access now being proposed from Sandpit Lane. It feels that the risk of obstruction of a single access in times of emergencies makes the proposal unsustainable and fails to follow Planning Guidance which states that streets should be designed to support safe behaviours, efficient interchange between travel modes and the smooth and efficient flow of traffic. The transport user hierarchy should be applied within all aspects of street design – and should consider the needs of the most vulnerable users first: pedestrians, then cyclists, then public transport users, specialist vehicles like ambulances and finally other motor vehicles. The Parish Council concurs with the concerns raised by the Neighbourhood Plan Team over the plans to have a single entrance road to/from the development directly onto Sandpit Lane with no pedestrian footpath.
5. The Parish Council feels that given the location of the site, a reliance on the private motor car will be generated in order to access amenities and services within both the village and further afield which will also be contrary to the sustainability objectives of

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

Whilst the Parish Council acknowledges that there are bus stops located along Sandpit Lane and the Interim Residential Travel Plan supplied by the applicant shows that there will be improvements to bus stops in Sandpit Lane to enhance the public transport experience (6.2.10), there is a concern that there is currently little capability of Sandpit Lane to have sufficient width to allow the passing of buses and that this will further exacerbate issues with the flow of traffic in both directions. The Parish Council would like to see localised widening at points along Sandpit Lane to accommodate this.

6. The Parish Council would also like to recommend that Suffolk County Council be involved in the discussion of future growth in Thurston with reference to the impact that this will have on the provision of education. As mentioned within the letter from Thurston's Neighbourhood Plan Team, both the Thurston Primary Academy School and Thurston Community College are at capacity (taking into account existing planning approvals) and as such this application will ensure that the educational infrastructure is unlikely to meet the demand placed on it by 175 dwellings. The Parish Council is aware that the application is for phased development but feels that from the outset the total provision should be understood and capacity explored. As such the Parish Council feels that this application will put a negative strain on the existing infrastructure and as such would be contrary to Policy CS6 of the Core Strategy.

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

Yours sincerely,

Victoria S Waples

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



From: Jason Skilton
Sent: 28 November 2016 10:08
To: Planning Admin
Cc: Kathryn Oelman
Subject: 2016-11-28 JS reply Land to the South of Norton Road, Thurston IP31 3QH Ref 2797/16

Suffolk County Council, Flood and Water Management can recommend the approval, subject to the following condition relation to surface water drainage being applied.

1. Concurrent with the first reserved matters application(s) a surface water drainage scheme shall be submitted to, and approved in writing by, the local planning authority. The scheme shall be in accordance with the approved FRA its addendum (Ref IP15_127_11 May 2016 & Nov 2016) and includes:
 - a. Dimensioned plans and drawings of the surface water drainage scheme;
 - b. Further infiltration testing on the site in accordance with BRE 365 and the use of infiltration as the means of drainage if the infiltration rates and groundwater levels show it to be possible;
 - c. If the use of infiltration is not possible then modelling shall be submitted to demonstrate that the surface water runoff will be restricted to Q_{bar} or 2l/s/ha for all events up to the critical 1 in 100 year rainfall events including climate change as specified in the FRA;
 - d. Modelling of the surface water drainage scheme to show that the attenuation/infiltration features will contain the 1 in 100 year rainfall event including climate change;
 - e. Modelling of the surface water conveyance network in the 1 in 30 year rainfall event to show no above ground flooding, and modelling of the volumes of any above ground flooding from the pipe network in a 1 in 100 year climate change rainfall event, along with topographic plans showing where the water will flow and be stored to ensure no flooding of buildings or offsite flows;
 - f. Topographical plans depicting all exceedance flowpaths and demonstration that the flows would not flood buildings or flow offsite, and if they are to be directed to the surface water drainage system then the potential additional rates and volumes of surface water must be included within the modelling of the surface water system;

The scheme shall be fully implemented as approved.

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

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

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

3. The development hereby permitted shall not be occupied until details of all Sustainable Urban Drainage System components and piped networks have been submitted, in an approved form, to and approved in writing by the Local Planning Authority for inclusion on the Lead Local Flood Authority's Flood Risk Asset Register.

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

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

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

Informatives

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

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864

Your ref: 2797/16
Our ref: 00045522
Date: 02 December 2016
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Lisa,

Re: Thurston, land south of Norton Road

I refer to the application for planning permission for the above scheme in Mid Suffolk. Suffolk County Council has previously provided consultation responses by way of letters dated 16 August 2016 and 14 November 2016.

New information has come to light that requires further consideration on highway and education impacts. I would be grateful if the District Council hold off from determining the application until consideration has been given to these matters by SCC.

Notwithstanding this consideration, it would be beneficial if the District Council can provide the applicant's observations to the education S106 contribution approach set out in my letter on 16th August 2016.

Yours sincerely,

P J Freer

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

cc Neil McManus, SCC
Iain Maxwell – SCC
Christopher Fish - SCC

From: Phil Watson
Sent: 09 November 2016 14:54
To: Lisa Evans
Subject: RE: Reconsultation on Planning Application 2797/16 Updated access information and Framework Drawing

Dear Lisa,

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Re-consultation on Planning Application 2797/16 Updated access information and Framework Drawing

I note the changes made by the applicant as set out in Thur 01/Rev C in order to respond to issues identified by Historic England in their letter of 2/11/16. On that basis I have no further comments on this matter in addition to those set out in my letter to you of the 04/10/16 as the details of the revised planting proposal can be finalised in the conditions I have already set out. However the applicant will need to be mindful of the space requirement to make the indicated planting effective and the need to ensure that a long term management scheme is in place so that the plantings can fulfil their mitigation function.

Best regards

Philip Watson CEnv MIAgrE

Senior Landscape Officer
Natural & Historic Environment Team - Strategic Development
Resource Management
Suffolk County Council
8 Russell Rd Endeavour House (B2 F5 47)
IPSWICH IP1 2BX

Tel: 01473 264777
Mob: 07872 676856
phil.watson@suffolk.gov.uk
www.suffolk.gov.uk
www.suffolklandscape.org.uk

DISCLAIMER: This information has been produced by Suffolk County Council's Natural Environment Team on behalf of Mid Suffolk District Council, at their request. However, the views and conclusions contained within this report are those of the officers providing the advice and are not to be taken as those of Suffolk County Council.

Jacqueline Pannifer

From: RM PROW Planning
Sent: 09 August 2016 14:08
To: Planning Admin
Cc: geoff.armstrong@arplanning.co.uk; Sam Bye
Subject: RE: Consultation on Planning Application 2797/16
Attachments: 279716 Land to the south of Norton Road - FP6 - map.pdf; 279716 Land to the south of Norton Road - FP6 - map.pdf

Our Ref: W523/006/ROW478/16

For The Attention of: Lisa Evans

Public Rights of Way Response

Thank you for your consultation concerning the above application.

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

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

Thurston Public Footpath 6 is recorded through the proposed development area.

We have no objection to these proposals.

Please include as footnotes in the decision notice:

Informative Notes:

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

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

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

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

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

Regards

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

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

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From: planningadmin@midsuffolk.gov.uk [<mailto:planningadmin@midsuffolk.gov.uk>]
Sent: 22 July 2016 15:11
To: RM PROW Planning
Subject: Consultation on Planning Application 2797/16

Correspondence from MSDC Planning Services.

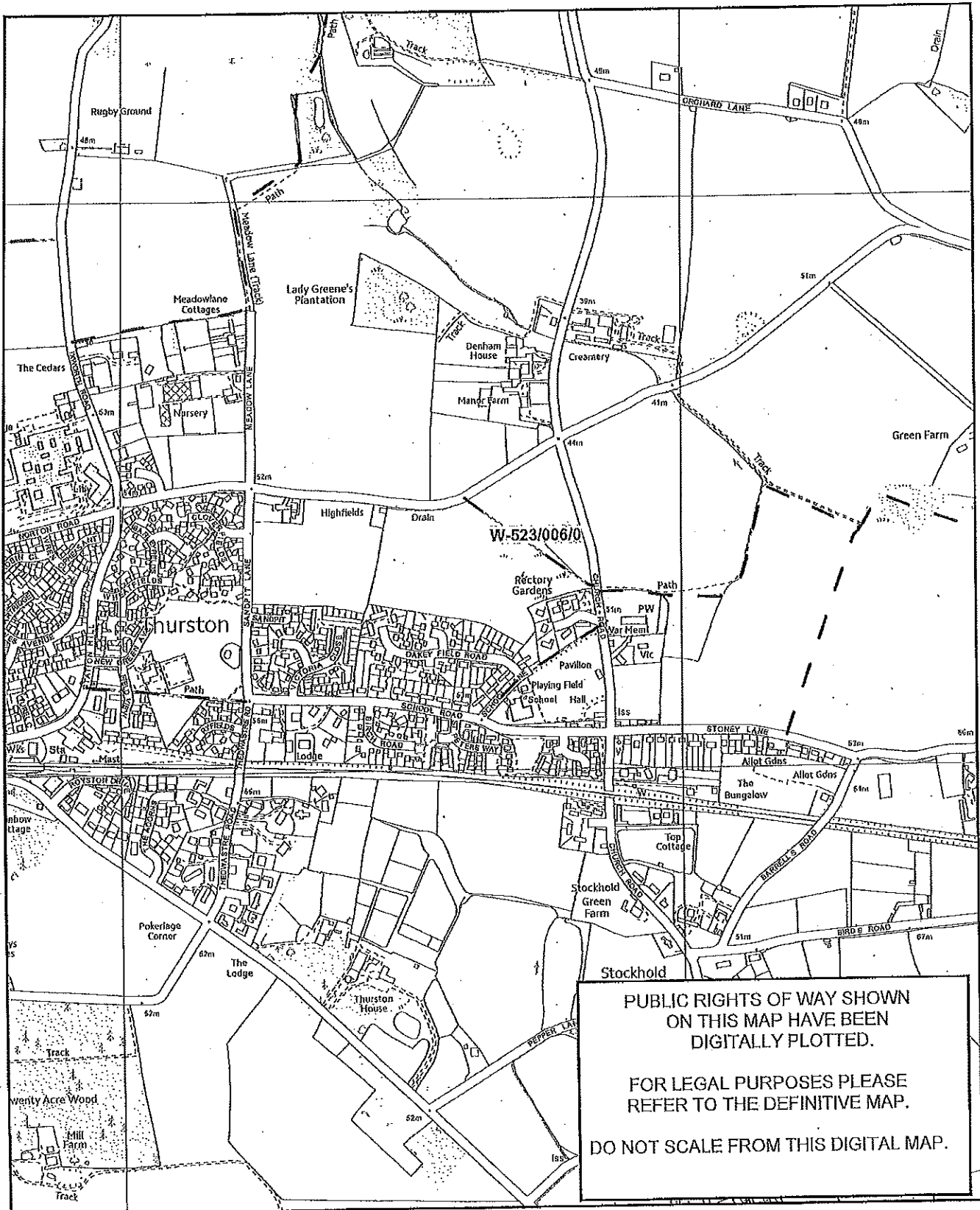
Location: Land to the South of Norton Road, Thurston IP31 3QH

Proposal: Outline Planning Application (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 and Norton Road

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 21 days. Please make these online when viewing the application.

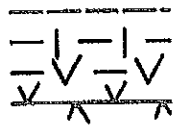
The planning policies that appear to be relevant to this case are GP1, NPPF, CSFR-FC1, H17, HB13, RT12, CL8, CSFR-FC1.1, SB3, Cpr1, Cor2, Cor5, Cor6, Cor9, CSFR-FC2, T9, T10, HB1, which can be found in detail in the Mid Suffolk Local Plan.



**2797/16 Land to the south of Norton Road, Thurston
Public Footpath 6**



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



Ordnance Survey MasterMap

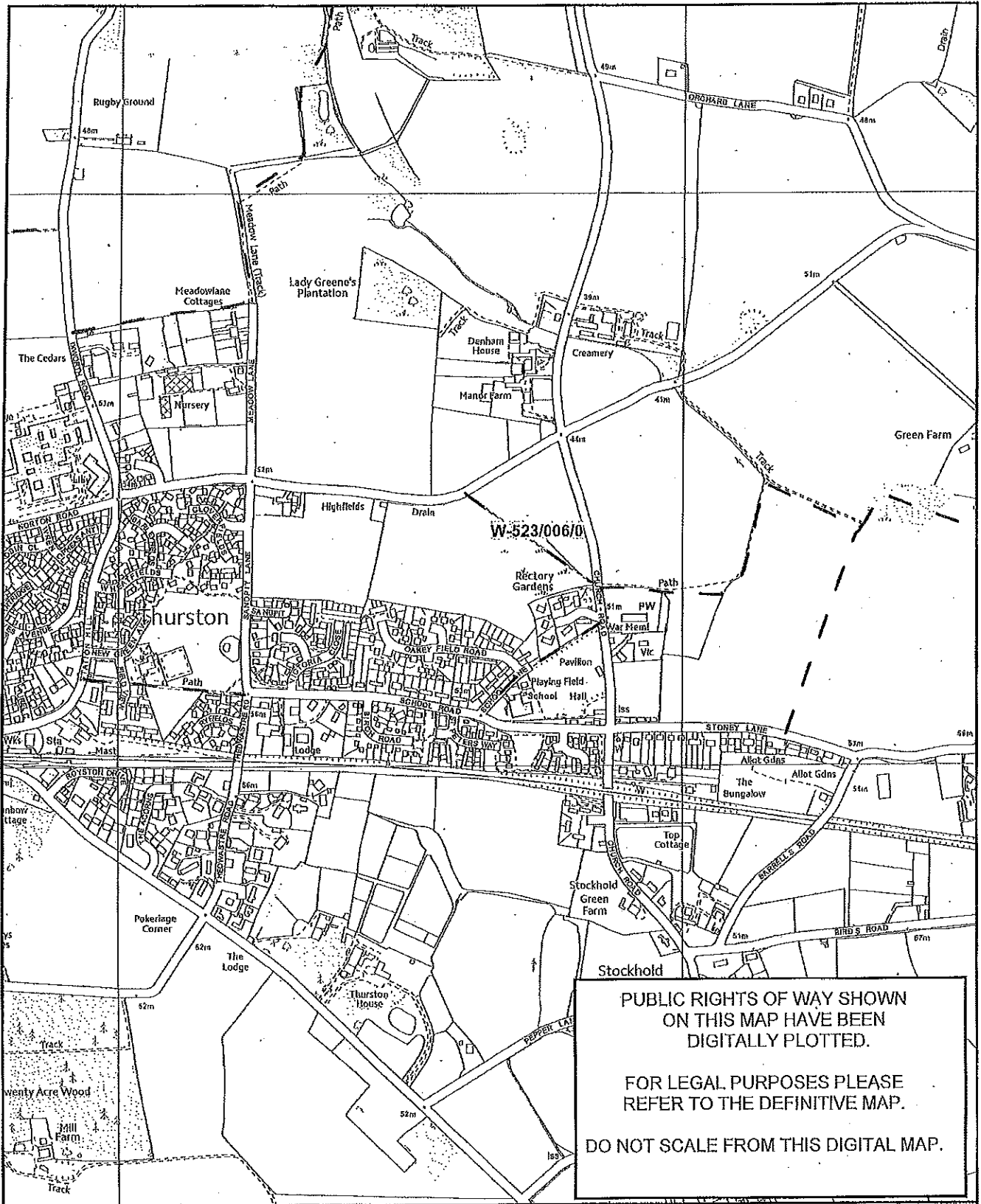
Public Footpath
Bridleway
Restricted Byway
Byway
Definitive Map Parish Boundary

Scale 1:7500



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Date: 09/08/216

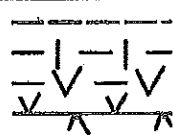


**2797/16 Land to the south of Norton Road, Thurston
Public Footpath 6**



**Suffolk
County Council**

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



Ordnance Survey MasterMap

Public Footpath
Bridleway
Restricted Byway
Byway
Definitive Map Parish Boundary

Scale 1:7500



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Date: 09/08/216

Your ref: 2797/16
Our ref: 00045522
Date: 07 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Dylan,

Re: Thurston, land south of Norton Road

Suffolk County Council previously provided a written response to this application for planning permission on 16th August 2016 which was time limited to six months. As this planning application will now be determined outside of this six months' period, the County Council will need to fully review matters. There have been four additional applications for planning permission very recently submitted on sites in Thurston. In view of these applications adding up to over 800 dwellings it is clear that the local situation has fundamentally changed such that the County Council needs to consider the cumulative impact implications on highways and education infrastructure in the locality.

Yours sincerely,

P J Freer

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

cc Neil McManus, SCC

Your ref: 2797/16
Our ref: Thurston – land south of
Norton Road 00045522
Date: 17 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Dylan,

Re: Thurston: land south of Norton Road – developer contributions

I refer to the outline planning application (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 and Norton Road. The plans have since been amended removing the access onto Norton Road.

To aid simplicity, as Mid Suffolk's CIL covers libraries and waste infrastructure, these have been removed from this letter but the County Council intends to make a future bid for CIL money of £37,800 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 five 'live' planning applications should be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council have 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 letter updates and

replaces previous consultation responses. These responses were submitted prior to the consideration of new information regarding the cumulative impacts on education and highways arising from a further four planning applications which, when including the 175 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

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- 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 Pupils Numbers				
	Permanent	95%	Temporary	Total	2016-17	2017-18	2018-19	2019-20	2020-21
Thurston CE Academy	210	200		200	198	211	212	208	203
Exworth Free School (11 - 16)	597	567	0	567	271	300	342	350	344
Thurston Community College (11 - 16)	1500	1425	0	1,425	1,501	1,599	1,585	1,547	1,547
11-16 total places	2097	1992		1992	1,832	1,899	1,927	1,887	1,891
Thurston Community College (with Sixth Form)	1940	1,843	0	1,843	1,828	1,849	1,862	1,872	1,868

School level	Minimum pupil yield:	Required	Cost per place £ (2016/17):
Primary school age range, 5-11*:	43	43	16,429
High school age range, 11-16:	31	0	18,355
Sixth school age range, 16+:	5	0	19,907

Total education contributions:	£706,447.00
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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.

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 43 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 175 dwellings it is forecast that 43 primary age pupils will arise
- Therefore 43 pupils x £16,429 per place = **£706,447 (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 43 places x £1,294 per place = **£55,642.**

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 = $\frac{£250,000}{60} = £4,167$
- Primary age pupils arising from this site is 43
- Proportionate contribution towards temporary classroom is 43 pupils x $£4,167$ per place = £179,181

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 needs to be undertaken, 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 175 dwellings, the County Council anticipates around 18 pre-school pupils eligible for funded early education. Currently there is sufficient capacity for only 10 pre-school pupils from this development. 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 8 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 175 dwellings there is the need for 8 additional places
 - Therefore 8 pupils x £8,333 per place = **£66,664 (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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- 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 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 WMS took effect from 06 April 2015.

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

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

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

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

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

- 9. Legal costs.** SCC will require an undertaking from the applicant for the reimbursement of its reasonable legal costs associated with work on a S106A for site specific mitigation, whether or not the matter proceeds to completion.
- 10. Time limit.** The above information is time-limited for 6 months only from the date of this letter.

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

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

Yours sincerely,

P J Freer

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

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

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

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

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

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

Iceni House, Cobham Road, Ipswich, IP3 9JD

From: Khan Wasil [mailto:Wasil.Khan@networkrail.co.uk] **On Behalf Of** Town Planning SE
Sent: 03 May 2017 11:57
To: Planning Admin
Cc: Town Planning SE
Subject: Consultation on Planning Application 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH / (anglia)

Dear Sir/Madam,

Thank you very much for consulting with Network Rail in regards to application 2797/16 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.

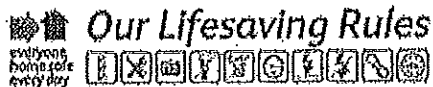
Having assessed the likely safety implications which would be likely to occur as a result of increased pedestrian traffic on the level crossing in this location, Network Rail recommend that no objection be raised subject to the applicants entering into a legal agreement which provides £1209.19 multiplied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

Kind Regards,

Wasil Khan
Town Planning Technician, Property

Network Rail
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1 Eversholt Street
London NW1 2DN
Tel: 07734 648485
E: Wasil.khan@networkrail.co.uk
www.networkrail.co.uk/property



From: planningadmin@midsuffolk.gov.uk [mailto:planningadmin@midsuffolk.gov.uk]

Sent: 06 April 2017 15:20

To: Town Planning SE

Subject: Consultation on Planning Application 2797/16 / Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Highfield, Norton Road, Thurston, Bury St Edmunds, IP31 3QH

Proposal: Outline Planning Application (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 and Norton Road

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, CSFR-FC1, H17, HB13, RT12, CL8, CSFR-FC1.1, SB3, Cor1, Cor2, Cor5, Cor6, Cor9, CSFR-FC2, T9, T10, HB1, which can

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587,
registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

Your Ref: MS/2797/16
Our Ref: 570\CON\2797\16
Date: 8th June 2017
Highways Enquiries to: steven.merry@suffolk.gov.uk



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

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

For the Attention of: Dylan Jones

Dear Dylan,

TOWN AND COUNTRY PLANNING ACT 1990 - CONSULTATION RETURN MS/2797/16

PROPOSAL: Outline Planning Application (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 and Norton Road

LOCATION: Land To The South Of, Norton Road, Thurston, IP31 3QH

ROAD CLASS: U

Notice is hereby given that the County Council as Highway Authority does not object to the proposal subject to the imposition of the conditions shown below on any permission to be granted and the completion of a S106 planning obligation to its satisfaction:

Proposed Highway Conditions

1. Condition: The new estate road junction with Sandpit Road inclusive of cleared land within the sight splays to this junction as shown on drawing no. IP15_127_11_SK002 Rev. C (Appendix F Transport Assessment published 18 November 2016) must be formed prior to any other works commencing or delivery of any other materials. The visibility splays shall thereafter be retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 1995 (or any Order revoking and re-enacting that Order with or without modification) no obstruction over 0.6 metres high shall be erected, constructed, planted or permitted to grow within the areas of the visibility splays.

Reason: To ensure a safe access to the site is provided before other works.

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

Reason: To ensure that roads/footways are designed and constructed to an acceptable standard and in the interests of promoting sustainable development.

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

Reason: To ensure that visibility splays and estate roads remain unobstructed by proposed planting in the interests of highway safety; to ensure new trees are not planted too close to carriageways to be lawfully replaced if they become highways and to prevent damage to the roads.

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

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques
- d) storage of plant and materials
- e) programme of works (including measures for traffic management and operating hours)
- f) provision of boundary hoarding and lighting
- g) protection of important trees, hedgerows and other natural features
- h) protection of the aquatic environment in terms of water quantity and quality
- i) details of proposed means of dust suppression and noise mitigation
- j) details of measures to prevent mud from vehicles leaving the site during construction
- k) haul routes for construction traffic on the highway network and
- l) monitoring and review mechanisms.

~~No works in respect of the construction of the development hereby permitted and no deliveries to the site during construction shall be undertaken at the following times;~~

~~Outside the hours of 0800 – 1800 on Mondays to Fridays (inclusive)~~

~~Outside the hours of 0800 – 1300 on Saturdays~~

~~On Sundays and on public holidays~~

Reason: In the interests of highway safety residential amenity and to ensure compliance with the Local Plan.

Note: the struck through elements of the above condition aren't considered necessary or in deed acceptable by the highway authority but may be relevant for other reasons.

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

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles, where on-street parking and manoeuvring would be detrimental to highway safety and further to National Planning Policy Framework paragraph 35.

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

Reason: To ensure that refuse recycling bins are not stored on the highway causing obstruction and dangers for other users. This is necessary to avoid inadequate space being provided.

7. Condition: Before the development of each dwelling plot is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development plot and its access onto the estate roads. The approved scheme(s) shall be carried out in their entirety before the dwelling(s) are first occupied and shall be retained thereafter in its approved form.

Reason: To prevent hazards caused by flowing water or ice on the estate roads, which are prospective highways. This is necessary to ensure adequate drainage measures can and are installed.

Note: The above condition may be incorporated into an overarching drainage condition.

8. Condition: Before the development is commenced details shall be submitted to and approved in writing by the Local Planning Authority showing the means to prevent the discharge of surface water from the development onto the highway. This shall include how the surface water will be disposed of. 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. This is necessary because details have not been submitted to demonstrate how this will be achieved at the proposed access.

9. Condition: No dwelling shall be occupied until the highway improvements shown on drawing no. IP15_127_11_SK002 Rev. C including local carriageway widening, bus stops including shelters and footways along Sandpit Lane have been substantially completed.

Reason: In the interests of highway safety and sustainable development.

10. Condition: No dwelling shall be occupied until a footway along Church Road as shown on drawing IP15/127/11/SK04 with street lighting has been substantially completed.

Reason: In the interests of highway safety and sustainable development.

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

Reason: To ensure that satisfactory access is provided for the safety of residents and the public.

12. Note: The existing street lighting system may be affected by this proposal. The applicant must contact the Street Lighting Engineer of Suffolk County Council, telephone 01284 758859, in order to agree any necessary alterations/additions to be carried out at the expense of the developer. The design of street lighting and any tree planting interrelate.

13. Note: 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 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 as necessary.

Proposed S106 Obligations:

1. Highway Improvement Contribution: £3733 contribution towards a Traffic Regulation Order (TRO) and associated works to extend the existing 30mph of speed limit on Norton Road eastwards to improve road safety for road users associated with the development. Payable prior to occupation of the first dwelling.
2. Highway Pedestrian Crossing Improvement Contribution: £19108 Contribution towards provision of pedestrian crossing facilities at Norton Road / Station Hill / Ixworth Road junction to provide improved pedestrian access to the Academy and mitigate increase pedestrian and vehicle use. Payable on occupation of the first dwelling.

3. Highway Capacity Improvement Contribution: £60308 Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton to mitigate congestion at peak periods. Payable on commencement of work on site.
4. Highway Safety Improvement Contribution: £11046 Contribution towards safety improvements at the C693 Thurston Road / C692 Thurston Road / C693 New Road including a contribution towards 40mph speed limit on the C692 Thurston Road to improve road safety and mitigate increased use. Payable on commencement of the first dwelling.

All the above 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.

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

5. Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is longer.

This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the travel plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.

6. Travel Plan Implementation Bond, or cash deposit - £104,631 (£598 per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.

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

7. Implementation of the Interim Travel Plan (when approved)
8. Provision of an approved welcome pack to each dwelling on first occupation
9. Approval and full implementation of the Full Residential Travel Plan on occupation of the 100th dwelling.
10. Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longer.
11. Securing and implementing remedial Travel Plan measures if the agreed reduction of vehicular use targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

Comments:

1. 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.

2. If one or more of the five sites are not granted approval by the Local Planning Authority it is strongly recommended that the conditions and obligations contained in this response are reconsidered so that they provide robust mitigation for the impact of those sites granted planning permission.
3. Following this application, the applicant submitted a duplicate planning application ref MS/5010/16. A separate response will be provided for that application
4. The reasons for refusal given in our letter dated 27th October 2016 relating to access from Norton Road have been addressed through the revised details including drawing no. Thur/01 Rev C – Development Framework Plan. If considered in isolation from the four subsequent major development applications in Thurston, notably application reference MS/5070/16 on land on the north side (opposite) of Norton Road, there is no reason remaining to refuse the proposal on transport grounds that cannot be addressed through conditions or S106 obligations.
5. It is recommended that a footway with street lighting be provided to link to the footpath leading to the existing primary school and wider community to the south and the open space. shows this footway and appears to be feasible. This ought to be provided before demand to use it will first arise from the new residents occupying the site.
6. Improvements to the surfacing of the footpath (Thurston Public Footpath 6), to make it useable all year, can be secured by condition. Likewise, connecting paths into the body of the development must be usable all year. This is directly relevant to the development, as children would not be expected to use this length of Church Road or onsite paths otherwise.
7. Contributions 1 to 4 and the costs attributed to each of the five development sites assume a collaborative approach to mitigating increase use of the public highway resulting from the five proposed developments in the Thurston area as outlined in our letter of the 10th March 2017. If this application is determined as a stand-alone application these conditions and contributions would need to be re-assessed
8. Whereas with no development on the north side of Norton Road there would be reduced reason for pedestrians from the Hopkins Homes development to use the footpath between Norton Road and Church Road to access Norton Road. The potential relocation of the primary school would make this route more attractive for residents of the east side of the site and beyond. In the interests of sustainable development overall, safe pedestrian access between the sites should be facilitated or at least not thwarted by the layout of the development.
9. Advisory comments only regarding internal road layout were made previously. One such comment referred to emergency access and it is noted that the main access road to the east half of the site includes a 3.7m wide footway/cycle track to reduce to a minimum the likelihood of complete obstruction of the sole access route. In addition, the advice regarding preferable locations of trees appears to have been heeded.
10. The revised Interim Residential Travel plan dated 2nd November 2016 is better than the original but is still not considered to be adequate.
11. One issue is the lack of any suitable measures to encourage the residents to travel sustainably. The provision of information alone in the proposed Welcome Packs will not be adequate. In common with other similar large residential proposals in Suffolk and at a minimum, it is recommended that a multi-modal voucher to the value of two monthly rail season tickets to Bury St Edmunds, or bus tickets or cycle voucher of equivalent value should be offered to each dwelling to incentivise sustainable travel in a meaningful manner. This will allow up to two residents per dwelling to experience the use of sustainable transport for enough time to potentially establish a routine. If this measure is implemented correctly (i.e. the resident must apply for the voucher through the Travel Plan Coordinator) it can also be cost-effective and provide additional monitoring for the Travel Plan.
12. There is still no reference to any remedial measures in the event the 10% modal shift in favour of sustainable transport is not achieved at the end of the Travel Plan monitoring period. The use of remedial measures is supported by the following paragraph of the Travel Plans, Transport Assessments and Statements in Decision Taking section of the 2014 Planning Practice Guidance:

"Travel Plans should identify the specific required outcomes, targets and measures, and set out clear future monitoring and management arrangements all of which should be proportionate. They should also consider what additional measures may be required to offset unacceptable impacts if the targets should not be met." Therefore, some suitable remedial measures, such as resubmitting welcome packs and off-site smarter choices should be included in the Travel Plan. Also, there is no reference to the Travel Plan issues that will need to be overcome with hard infrastructure, such as the links to the two schools.

13. There have been improvements to the baseline data and monitoring duration proposed in Travel Plan, so those issues have been resolved.

Yours sincerely,

Steve Merry
Transport Policy and Development Manager
Strategic Development – Resource Management

From: Steve Merry
Sent: 12 June 2017 18:07
To: Dylan Jones
Cc: Philip Isbell; Neil McManus; Christopher Fish
Subject: Thurston Matrix

Dylan
Matrix as requested
Regards
steve

Steve Merry
Transport Policy and Development Manager
Resource Management
Suffolk County Council
Endeavour House, 8 Russell Road, Ipswich, Suffolk
IP1 2BX

Tel: 01473 341497
Email: steven.merry@suffolk.gov.uk

Calc sheet

Item	Location	Process	Total Cost	2/9/76	4/8/76 Full	4/9/76 Full	4/9/76 Full	5/7/76	Trigger Point
T1	K143 Bury Road / C587 Thurston Road / C549 Brand Road	Junction Improvements (Capacity)	\$106	175	138	138	138	175	507,016
T2	C589 Thurston Road / C582 Thurston Road / C583 New Road	Junction Improvements (Road Safety). Re-route east through new development to create two 3 way safety junctions. Install 40mph speed limit	\$106	\$51,046	\$5,711	\$4,040	\$4,176	\$5,711	507,016
T3	C591 Barton Road / C582 Station Road (N rail line)	Junction Improvements (Capacity)	\$106	0	0	0	0	0	507,016
T4	Iveworth Road	Extend speed limit to Thurston Rugby Club	\$106	0	0	0	0	0	507,016
T5	Norton Road (east)	Extension of speed limit	\$106	0	0	0	0	0	507,016
T6	Barton Road	Extension of speed limit west of Mill Lane	\$106	0	0	0	0	0	507,016
T7	Norton Road (east)	Pedestrian crossing between Meadow Lane and Station Hill / Joveth Road (uncontrolled)	\$278	0	0	0	0	0	507,016
T8	Iveworth Road	Footway on west side between Norton Road and Postimont site	\$278	0	0	0	0	0	507,016
T9	Iveworth Road	Footway link to Thurston Rugby Club	\$278	0	0	0	0	0	507,016
T10	Norton Road / Station Hill / Iveworth Road	Pedestrian crossing facilities (zebra on Norton Rd east and footway on north side from Meadow Lane eastwards Church Lane	\$106	\$19,108	\$5,988	\$27,297	\$27,297	\$19,108	507,016
T11	Norton Road (east)	Crossing between Hopkins site and Pigeon site (uncontrolled)	\$278	0	0	0	0	0	507,016
T12	Norton Road (east)	2 no pedestrian crossing (uncontrolled) south of Clewfields and north of sandpit Drive	\$278	\$2,333	0	0	0	0	507,016
T13	Church Road	Prohibit installed footway	\$278 (check ref S106)	0	0	0	0	0	507,016
T14	Church Road	Street lighting	\$278	\$10,000	0	0	0	0	507,016
T15	Sanfill Lane	2 no pedestrian crossing (uncontrolled) south of Clewfields and north of sandpit Drive	\$278	\$50,000	0	0	0	0	507,016
T16	Barton Road	Extension of footway along Barton Road	\$278	0	0	0	0	0	507,016
T17	Norton Road	Bis stops east of Rylands Circle	\$106 (can be \$278)	0	0	0	0	0	507,016
T18	Meadow Lane	Modify to improve cycle / pedestrian facilities (bar mainline steps to pavements)	\$278	0	0	0	0	0	507,016
T19	Iveworth Road to Meadow Lane	Improve PROW 001 (un installed?)	\$106	0	0	0	0	0	507,016
T20	Iveworth Road to Mill Lane	Improve PROW 018 (un installed)	\$106	0	0	0	0	0	507,016
T21	Barton Road to Heath Road	New PROW link along southern boundary to Heath Road and Side Road 51	\$106	0	0	0	0	0	507,016
T22	Barton Road	New PROW link along southern boundary to Bin Barton Road	\$38	0	0	0	0	0	507,016
T23	Norton Road to Church Road	Improve PROW 006 (installed)	\$38	0	0	0	0	0	507,016
T24	North of Meadow Lane	Improve PROW 007 (un installed)	\$106	0	0	0	0	0	507,016

Item	2/9/76	4/8/76 Full	4/9/76 Full	4/9/76 Full	5/7/76	Trigger Point
T1	175	138	138	138	175	507,016
T2	\$51,046	\$5,711	\$4,040	\$4,176	\$5,711	507,016
T3	0	0	0	0	0	507,016
T4	0	0	0	0	0	507,016
T5	0	0	0	0	0	507,016
T6	0	0	0	0	0	507,016
T7	0	0	0	0	0	507,016
T8	0	0	0	0	0	507,016
T9	0	0	0	0	0	507,016
T10	\$19,108	\$5,988	\$27,297	\$27,297	\$19,108	507,016
T11	0	0	0	0	0	507,016
T12	\$2,333	0	0	0	0	507,016
T13	0	0	0	0	0	507,016
T14	\$10,000	0	0	0	0	507,016
T15	\$50,000	0	0	0	0	507,016
T16	0	0	0	0	0	507,016
T17	0	0	0	0	0	507,016
T18	0	0	0	0	0	507,016
T19	0	0	0	0	0	507,016
T20	0	0	0	0	0	507,016
T21	0	0	0	0	0	507,016
T22	0	0	0	0	0	507,016
T23	0	0	0	0	0	507,016
T24	0	0	0	0	0	507,016
Total	\$970,600	\$27,727	\$27,727	\$27,727	\$27,727	\$970,600