

From: Rutter, Matilda [mailto:Matilda.Rutter@HistoricEngland.org.uk]
Sent: 13 January 2017 12:40
To: Planning Admin
Subject: Application for Planning Permission: LAND TO THE SOUTH OF NORTON ROAD, THURSTON, SUFFOLK, IP31 3QH (5010/16)

Dear Mr Jones

**LAND TO THE SOUTH OF NORTON ROAD, THURSTON, SUFFOLK, IP31 3QH
(5010/16)
Application for Planning Permission**

Thank you for consulting Historic England on the above application dated 12th January 2017. The lead specialist for this case (David Eve) has assessed the application and asks that you please refer to our previous comments on the duplicate application (2797/16) dated 11/08/16 (initial application) and 02/11/16 (amendments to application). I have attached these to this email.

Our comments remain the same.

Kind regards

Matilda Rutter | Business Officer (Suffolk)
Telephone: 01223582749
Direct Line: 01223 582740
Historic England | Brooklands
24 Brooklands Avenue | Cambridge | CB2 8BU
www.historicengland.org.uk

For the first time ever, you can no



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

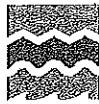


24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

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

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



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

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



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

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.



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

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



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.

Consultee Comments for application 5010/16

Application Summary

Application Number: 5010/16

Address: Land to the south of Norton Road, Thurston IP31 3QH

Proposal: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16)

Case Officer: Dylan Jones

Consultee Details

Name: Mr Robert Boardman (Stowmarket Ramblers)

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

Email: bob@gardeners8.plus.com

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

Comments

I have viewed these plans and the only public footpath, no.6, which crosses this site to the north east corner will be through the "green area" and will become another "manufactured" path and lose its natural appeal.

From: Phillippa Stroud
Sent: 20 January 2017 16:43
To: Planning Admin
Cc: Dylan Jones
Subject: 5010/16/OUT Land to the south of Norton Road, Thurston

WK/188833

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

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

Please refer to our previous comments, from Joanna Hart, on duplicate application 2797/16/OUT dated 12.08.16 and 17.11.16.

We have no further comments.

Regards,

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

From: Consultations (NE) [mailto:consultations@naturalengland.org.uk]
Sent: 13 January 2017 15:55
To: Planning Admin
Subject: 5010/16 Consultation response

Dear Sir/Madam,

Application ref: 5010/16
Our ref: 205911

Natural England has no comments to make on this application.

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

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

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

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

Yours faithfully

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

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

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

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

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

For further information on the Discretionary Advice Service see [here](#)

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



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: 5010/16

Referring to the planning application referenced above, dated 16 January 2016, application for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments and vehicular access from Sandpi Lane, 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: 23 January 2017
Name: David Abbott	Position: Asset Manager
Highways England: Woodlands, Manton Lane Bedford MK41 7LW	
david.abbott@highwaysengland.co.uk	

From: Andrea Stordy
Sent: 23 January 2017 12:13
To: Planning Admin
Subject: FAO: Dylan Jones

Planning Application: 5010/16
Location: Land to the South of Norton Rd, Thurston, IP31 3QH

Good Afternoon,

Thank you for your letter of 12/01/2017.

Please be advised that we have made formal comment on Land to the South of Norton Rd, Thurston, IP31 3QH, under planning application 2797/16, which we note has been published. The comment may remain in place for planning application 5010/16.

If you have any queries, please email them to water.hydrants@suffolk.gov.uk, quoting Fire Ref.: F310954.

Kind regards,

Sent on behalf of the Water Officer

Andrea Stordy
BSC

Engineering,

From: RM Floods Planning
Sent: 23 January 2017 14:35
To: Planning Admin
Cc: Dylan Jones
Subject: 2017-01-23 Land to the south of Norton Road, Thurston IP31 3QH Ref 5010/16

Suffolk County Council, Flood and Water Management refer you to our comments made to the application 2797/16.

Kind Regards

Jason Skilton
Flood & Water Engineer
Suffolk County Council

Tel: 01473 260411
Fax: 01473 216864



England

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

Email address: kerryharding@nhs.net

Telephone Number -- 0113 824 9111

Your Ref: 16/5010

Our Ref: NHSE/MIDS/16/5010/KH

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

27 January 2017

Dear Sirs,

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

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

Background

2. The proposal comprises a development of up to 175 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

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

Healthcare Impact Assessment

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

High quality care for all, now and for future generations

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

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

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

Notes:

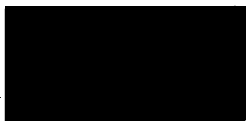
1. The weighted list size of the Practice based on the Carr-Hill formula, this figure more accurately reflects the need of a practice in terms of resource and space and may be slightly lower or higher than the actual patient list.
 2. Current Net Internal Area occupied by the Practice.
 3. Based on 120m² per GP (with an optimal list size of 1750 patients) as set out in the NHSE approved business case incorporating DH guidance within "Health Building Note 11-01: facilities for Primary and Community Care Services".
 4. Based on existing weighted list size.
6. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore a proportion of the required funding for the provision of increased capacity at Woolpit Health Centre, servicing the residents of this development, by way of their phase 2 premises extension, would be sought from the CIL contributions collected by the District Council.
7. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above mentioned surgery. Should the level of growth in this area prove this to be unviable, options of relocation of services would be considered and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

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

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

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

Yours faithfully



Kerry Harding
Estates Advisor

High quality care for all, now and for future generations

From: Nathan Pittam
Sent: 03 February 2017 08:51
To: Planning Admin
Subject: 5010/16/OUT. EH - Land Contamination.

M3 : 188839
5010/16/OUT. EH - Land Contamination.
Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping ...

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that the applicant has not submitted the required BS10175 compliant Phase I desk study to demonstrate the suitability of the site for the proposed end use. Without this information I would be minded to recommend that the application be refused on the grounds of insufficient information.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715
m: 07769 566988

From: Nathan Pittam
Sent: 03 February 2017 08:51
To: Planning Admin
Subject: 5010/16/OUT. EH - Land Contamination.

M3 : 188839

5010/16/OUT. EH - Land Contamination.

**Land to the South of, Norton Road, Thurston, BURY ST EDMUNDS, Suffolk.
Application for Outline Planning Permission (with all matters other than means
of access reserved) for residential development of up to 175 dwellings with
associated car parking, landscaping ...**

Many thanks for your request for comments in relation to the above application. I have reviewed the application and note that the applicant has not submitted the required BS10175 compliant Phase I desk study to demonstrate the suitability of the site for the proposed end use. Without this information I would be minded to recommend that the application be refused on the grounds of insufficient information.

Regards

Nathan

Nathan Pittam BSc. (Hons.) PhD
Senior Environmental Management Officer
Babergh and Mid Suffolk District Councils – Working Together
t: 01449 724715
m: 07769 566988

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

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

31st January 2017

Dear Cllr. Robinson,

Re: 5010-16 – 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 (duplicate to application 2797/16) @ land to the south of Norton Road

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

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

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

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

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

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

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

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

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

- **Education:**

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

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

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

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

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

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

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

In addition, given capacity and legislative issues

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

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

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

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

- **Housing**

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

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

Site	Land west of Ixworth Road 4963/16	Land at Norton Road 5070/16	Land at Meadow Lane 4942/16	Land south of Norton Rd 2797/16 5010/16	Land west of Barton Rd 4386/16	Land west of Ixworth Road 4963/16	Land at Norton Road 5070/16	Land at Meadow Lane 4942/16	Land south of Norton Rd 2797/16 5010/16	Land west of Barton Rd 4386/16	Land west of Ixworth Road 4963/16	Land at Meadow Lane 4942/16
Bedrooms	Market Housing					Affordable Housing					Intermediate/shared equity	
1		5										24 appts
2		4 terraced 12 bungalows	6		4 bungalows		0 bungalows 5 appts					18 houses
3		25 semis 26 detached	13		3 bungalows 22 houses		3 bungalows 5 appts 12 terraced					6 houses
4		31 detached	17		48 houses		31 semis 6 detached					2 houses
5		18 detached	6		13 houses 2 4/5 houses							
Selfbuild		9										
Sub Total	163	130	42	114	90	85	70	18	61	40	22	6
Total	539					280					28	
Final total 827 dwellings												

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

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

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

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

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

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

- Transport

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

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

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

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

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

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

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

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

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

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

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

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

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

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

• Social Challenges

The Neighbourhood Plan Team is aware that with all growth the village faces a number of challenges and that whilst there are policies in place to ensure all developments provides a safe community; protects the

environment from adverse impacts; reduces the level of crime or overcomes the fear of crime and provides a safe and secure environment, often the social impact of such growth is overlooked.

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

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

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

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

Overall the Neighbourhood Plan Team recognises that the agents acting on behalf of Hopkins Homes have considered some of the issues and comments raised previously vis-à-vis pedestrian crossings; footpaths; phased development and clustering. However, the team still has the following concerns and would ask the Parish Council to consider its concerns for this application on this site for the following reasons:

- Whilst the provision of 2 crossings is welcomed, the concern is that these are uncontrolled and will cause confusion as in the case of such a crossing located to the south of the development
- road safety issues with emphasis on those accessing the A14 via the pinch point at the railway bridge on Sandpit Lane – Thedwastre Road and onto Pokeridge Corner
- road safety with emphasis on the junctions of Norton Road and Ixworth Road for those accessing the Community College at the AM and PM peak times
- 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
- development inappropriate to that of sites abutting the proposed land – whilst the new outline plans have bungalows backing onto bungalows in existing housing areas, there is a concern that the outline plans show 2.5/3 storey dwellings which are neither in keeping or in conformity with the rest of the village nor suitable for a site in such a location on the edge of a village
- village infrastructure particularly education and medical provision
- type and density of housing mix not in accordance with the Neighbourhood Plan findings of the Ipswich Housing Market Area, Strategic Housing Market Assessment and the 2014 Suffolk Housing Needs Survey, all of which indicate that there is a high demand for smaller homes across all tenures both for younger people and for older people.
- cost of affordable homes for local residents – the application fails to take into account the District Wide need on the housing register for 1 and 2 bedrooms with a smaller element requiring 3+ bedroom properties.

In summary, whilst the Neighbourhood Plan Team recognises the need for future development to take place within Thurston, it still has concerns with this application and does not support the application in its present guise for the concerns outlined above.

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

Yours faithfully,

Victoria S Waples

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

THURSTON PARISH COUNCIL

Parish Council Office
New Green Centre
Thurston
Suffolk
IP31 3TG



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

SENT AS AN E-MAIL

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

February 14th 2017

Dear Mr. Isbell,

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

Case Officer: Dylan Jones

The Parish Council acknowledges that this application is a duplicate of that submitted under 2797/16 and recognises that certain aspects of the application have been amended. It recognises that pedestrian crossings, footpaths, phased development and clustering now feature within the new application. However, the Parish Council still has concerns with this site and as such objects to the application in its current guise.

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

The site and surrounding area are within the countryside and therefore outside of any settlement boundary for Thurston as defined by Mid Suffolk's Local Plan which would result in the development of new dwellings that would be visually, physically and functionally isolated from the facilities and services offered by Thurston as a Key Service Centre. At this point development of the site would significantly change the character of the village which is currently rural and would therefore not only be contrary to GP1 – Design and Layout of Development but also be contrary to csfr-fc2 provision and distribution of housing and cor2 development in the countryside and countryside villages.

The Parish Council feels that the application submitted is not sympathetic to the countryside in which it is situated, that it fails to protect the intrinsic character of the countryside by the density and mix of properties being proposed and will compromise the impact of the view of the approaching village when accessed from Norton Road. The Parish Council still holds the view that the internal layout is not in keeping with the area which it abuts and 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.

It is further 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 significantly 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, as 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, it is therefore inconsistent with paragraph 58 of the NPPF and that the application, if approved will fail to consider the loss of permanent pastureland, will fail to protect the wildlife habitats at this point in the village and will be contrary to policy CL8 – protecting Wildlife Habitats.

The Parish Council considers that the application has still not considered adequately the current road infrastructure and the negative impact that will be had on road safety. It is still held that the location of the site will have 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).

Whilst it is acknowledged that the application has allowed for the provision of pedestrian crossings, it is noted that these are to be uncontrolled and as such the Parish Council is concerned that this will cause confusion as to rights of way as is the case of such a crossing located to the south of the development. Given that there will be a significant number of children using such crossings to access schools and village facilities the Parish Council would like to see controlled pedestrian crossings as a basic provision. There 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, regarding 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 notes that the application has allowed for the addition of Bus Shelters outside the site frontage however, it still has concerns that the traffic that will be generated from this site will impact on the existing road network (CS6 – services and infrastructure) and that there will be a reliance on the private motor car to access amenities and services not only within the village but 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. Generally the Parish Council is concerned that the expected daily total of 1005 traffic movements (JMS Transport Assessment 12th May 2016) will place a further burden on the current road network at (but not confined to) points such as Fishwick Corner, Pokeridge Corner, the narrow railway bridge

crossings on Barton Road, the Priority System on Thedwastre Road and entry and exit points onto the A14.

The Parish Council, until the Order for the Neighbourhood Plan is laid, is expected to respond to current planning applications in line with policies set out in the Mid Suffolk Local Plan. It is recognised and understood that, as defined by Mid Suffolk's Local Plan, Thurston is a Key Service Centre and growth is assumed to be in line with current policy. Policies cor1 (cs1 settlement hierarchy) and cor2 (CS2 development in the countryside and countryside villages) have been considered in the Council's response to this application. The Parish Council has not only looked at current policy, but has also taken on board views of the members of the public who attended the Planning Committee Meeting held to discuss this application amongst others as well as those of the Neighbourhood Plan Team who are in the process of undertaking a Neighbourhood Plan for Thurston. The Parish Council has received correspondence from the Neighbourhood Plan Team on this application and has agreed that the viewpoints contained within its letter are so relevant to this application that they are to be included within its submission. It is known that that letter was submitted to the Planning Department at Mid Suffolk on 3rd February and its contents should be taken as being fully endorsed by the Parish Council.

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

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

As confirmation, whilst the Parish Council recognises that amendments have been made to this application and that some concerns raised under Planning Application 2797/169 have been considered, it continues to object to this application in its current form.

Yours sincerely,

Victoria S Waples

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





Consultation Response Pro forma

1	Application Number	5010/16 Norton Road, Thurston	
2	Date of Response	17.2.17	
3	Responding Officer	Name:	Paul Harrison
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage
4	Summary and Recommendation (please delete those N/A) Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	<p>1. The Heritage Team considers that the proposal would cause</p> <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; the level of harm is considered low. <p>2. The Heritage Team recommends that refinement of the layout and landscaping scheme be pursued; harm should then be weighed against any public benefits of the scheme.</p>	
5	Discussion Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>The site and proposal appear unchanged from the previous application 2797/16 and there appears no reason to alter the substance of our comment on that proposal. Short sections are now added with the intention of clarifying the Heritage team's view on the level of harm to the setting of Manor Farmhouse.</p> <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</p>	

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

		<p>significance of Manor Farmhouse is considered low.</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.	<p>Amendments, Clarification or Additional Information Required (if holding objection)</p> <p>If concerns are raised, can they be overcome with changes? Please ensure any requests are proportionate</p>	<p>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 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. Amendments along these lines would serve to minimise harmful impact in line with NPPF paragraph 129.</p>
7	<p>Recommended conditions</p>	

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

Your ref: 5010/16
Our ref: Thurston – land south of
Norton Road duplicate application
00049275
Date: 18 February 2017
Enquiries to: Peter Freer
Tel: 01473 264801
Email: peter.freer@suffolk.gov.uk

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

Dear Dylan,

Thurston: land south of Norton Road duplicate application– 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 Sandpif Lane and Norton Road (duplicate to application 2797/16).

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 'live' planning applications should be secured by way of a Section 106 planning obligation. Alongside the CIL Charging Schedule the District Council has published a Regulation 123 Infrastructure List. Under Regulation 123(4) 'relevant infrastructure' means where a charging authority has published on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In those instances in which planning obligations are sought by Suffolk County Council they are not 'relevant infrastructure' in terms of the Regulation 123 List published by the District Council. However, it is for the District Council to determine this approach when considering the interaction with their published 123 Infrastructure List.

I set out below Suffolk County Council's response, which provides the infrastructure requirements associated with this planning application and this will need to be considered by Mid Suffolk District Council. This consultation response considers the cumulative impacts on education arising from existing planning applications which, when including the 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
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places
- Provision of waste infrastructure

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

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

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

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

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

School	Capacity			Actual/Forecast Pupil Numbers					
	Permanent	96%	Temporary	Total	2016-17	2017-18	2018-19	2019-20	2020-21
Thurston CE Academy	210	200		200	196	211	212	208	203
		0		0					
Ixworth Free School (11 - 16)	597	687	0	667	271	300	342	350	344
Thurston Community College (11 - 16)	1500	1425	0	1,425	1,561	1,500	1,585	1,647	1,647
11-16 total places	2097	1992		1892	1,832	1,800	1,927	1,897	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
--------------------------------	--------------------

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:

- 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 fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

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

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

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

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

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

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

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

Yours sincerely,

P J Freer

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

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

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



28 February 2017

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

By email only

Hi Dylan

Application: 5010/16

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

Proposal: Application for Outline Planning Permission (with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16)

Thank you for consulting Place Services on the above application.

No objection subject to conditions.

Based on the ecological reports provided by the applicant and a site visit carried out on 2 February 2017, 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 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 (based on BS42020 model conditions) 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)

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.

Please contact me with any queries.

Best wishes

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

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

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

Your ref: 5010/16
Our ref: Thurston – land south of Norton Road
duplicate application 00049275
Date: 05 March 2017
Enquiries to: Neil McManus
Tel: 01473 264121 or 07973 640625
Email: neil.mcmanus@suffolk.gov.uk

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

Dear Dylan,

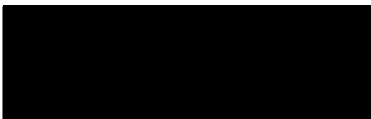
Thurston: land south of Norton Road duplicate application

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 (duplicate to application 2797/16).

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

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

Yours sincerely,



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

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

For the attention of: Dylan Jones

Dear Dylan,

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

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

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

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

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

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

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

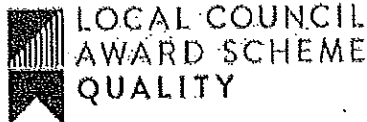
Kind regards

Vicky

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

Tel: 01359 232854

Website: Thurston.suffolk.cloud





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

AW Reference: 00020546
Local Planning Authority: Mid Suffolk District
Site: Land to the South of Norton Road, Thurston
Proposal: Application for Outline Planning Permission
(with all matters other than means of access reserved) for residential development of up to 175 dwellings with associated car parking, landscaping, public open space areas, allotments, and vehicular access from Sandpit Lane (duplicate to application 2797/16)
Planning Application: 5010/16

Prepared by: Sandra Olim

Date: 31 March 2017

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

ASSETS

Section 1 – Assets Affected

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

WASTEWATER SERVICES

Section 2 – Wastewater Treatment

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

Section 3 – Foul Sewerage Network

- 3.1 The sewerage system at present has available capacity for these flows, 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
-

Sent: 25 April 2017 16:26

To: Dylan Jones

Subject: RE: Planning applications for 872 houses in Thurston

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

Flood risk

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

Foul water disposal

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

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

Water supply

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

DEVELOPMENT SHOULD NOT BE COMMITTED AHEAD OF SECURE WATER SUPPLIES

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

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

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

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

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

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

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

I trust this information is useful.

Graham Steel
Sustainable Places Planning Advisor
East Anglia area East

Internal 58389

External 02 03 02 58389

Mobile 07845 875238

graham.steel@environment-agency.gov.uk

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

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

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

Iceni House, Cobham Road, Ipswich, IP3 9JD

Your Ref: MS/5010/16
Our Ref: 570\CON\5010\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/5010/16

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

Introduction

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

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

This application is a duplicate of MS/2797/16. A separate response has been provided for that application

Proposed Highway Conditions

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:

1. Condition: Before the development is commenced, details of the estate roads 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 constructed to an acceptable standard.

2. 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.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. Condition: No other part of the development shall be commenced until the new access has been laid out and completed in all respects for a minimum 20m from the nearside channel line of Sandpit Lane in accordance with Drawing No. JMS (East Anglia) Ltd drawing no. IP15_127_11_SK002 Rev. C including uncontrolled pedestrian crossing points each side of the access and been made available for use. Thereafter the access shall be retained in the specified form.

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

9. 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:

10. Condition: Before the access is first used visibility splays shall be provided as shown on Drawing No. JMS (East Anglia) Ltd drawing no. IP15_127_11_SK002 Rev. C with an X dimension of 2.4m and a Y dimension of 90m and thereafter 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 vehicles entering the highway have sufficient visibility to enter the public highway safely and vehicles on the public highway would have sufficient warning of a vehicle emerging in order to take avoiding action if necessary.

11. Condition: No dwelling shall be occupied until the highway improvements shown on Drawing no. IP15_127_11_SK002 Rev. C are completed. These improvements are a scheme of highway improvements including local carriageway widening, bus stops and footways along Sandpit Lane. The indicative details are acceptable in principle although detailed design will need to be agreed during the S278 agreement process.

Reason: To provide improve the public highway in the interests of public safety and provide a sustainable highway infrastructure.

12. Condition: No dwelling shall be occupied until the highway improvements shown on Drawing no IP15/127/11/SK04 are completed. Drawing IP15/127/11/SK04 shows this footway and appears to be feasible. It is recommended that a footway with street lighting be provided along Church Road to link to the footpath leading to the existing primary school and wider community to the south and the open space.

Reason: To provide a safe link for pedestrians between the site and infrastructure, specifically the primary school, within the village.

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.

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

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

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

S106 Contributions

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

1. Highway Improvement Contribution: Improvements to Thurston Footpath 1 between Meadow Lane and Ixworth Road to facilitate better pedestrian access between the site and Ixworth Road.
2. Highway Improvement Contribution: Improve Thurston Footpath 7 north of Meadow Lane to provide improved access to the wider Public Rights of Way network and mitigate increased use by pedestrians
3. Highway Improvement Contribution: Contribution towards a Traffic Regulation Order (TRO) and associated works to extend the existing 30mph of speed limit on Norton Road eastwards beyond Church Road to improve road safety.
4. Highway Improvement Contribution: 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.
5. Highway Improvement Contribution: Contribution towards improvements at the A143 Bury Road / C691 Thurston Road/ C649 Brand Road, junction at Great Barton to mitigate congestion at peak periods.
6. Highway Improvement 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.
7. 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:
8. Travel Plan Travel Plan Evaluation and Support Contribution - £1,000 per annum from occupation of the 100th dwelling for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest. This is to cover Suffolk County Council officer time working with the Travel Plan Coordinator and agreeing new targets and objectives throughout the full duration of the travel plan. If the contribution is not paid Suffolk County Council may not be able to provide sufficient resource to assisting the ongoing implementation and monitoring of the travel plan, which may result in the failure of the Travel Plan to mitigate the highway impact of this development.
9. Travel Plan Implementation Bond, or cash deposit - £118,525 (£593 per dwelling – based on the estimated cost calculated by Suffolk County Council of fully implementing the travel plan). This is to cover the cost of implementing the travel plan on behalf of the developer if they fail to deliver it themselves.

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

- Implementation of the Interim Travel Plan (when approved)
- Provision of an approved welcome pack to each dwelling on first occupation
- Approval and full implementation of the Full Travel Plan
- Monitoring the Travel Plan for a minimum of five years, or one year after occupation of the final dwelling, whichever is longest

- Securing and implementing remedial Travel Plan measures if the vehicular reduction targets are not achieved, or if the trip rate in the Transport Assessment is exceeded when the site is occupied

Comments:

1. The reasons for refusal given in my 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.
2. 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.
3. Contributions 3 to 8 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 site is determined as a stand-alone application these conditions and contributions would be re-assessed. If this development proceeds in isolation and none of the others are granted permission it is considered that Highway Contributions 1, 2, 5, and 8 should be funded in their entirety by this development and a proportional contribution made to Highway Contributions 3, 4 and 7.
4. Whereas with no development on the north side of Norton Road there would be little reason for pedestrians from the 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.
5. We made advisory comments only regarding internal road layout in my letter dated 27th October 2016. 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 tree locations appears to have been heeded.
6. 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.' The Interim Residential Travel Plan (dated 22nd December 2016) that was submitted to support the planning application for 200 dwellings in Thurston has identified some suitable measures and targets to mitigate the impact on the existing highway infrastructure. However, there will need to be some amendments made to the Travel Plan, which are as follows:
7. The nos. 384 and 385 bus services that serve within the vicinity of the proposed development would only be suitable for commuting to Bury St Edmunds for a typical 9am to 5pm shift. The times and frequencies would not be suitable for commuting to

Stowmarket, which is also a major employment destination for residents of Thurston identified by the 2011 Census. There will need to be further reference in the Travel Plan on how this issue could be overcome.

8. The Travel Plan monitoring makes no reference to surveying the residents, only the staff that will work at the proposed Primary School. This will need to be amended to monitor the residential element of the Travel Plan from occupation of the 100th dwelling instead of one year after opening. The monitoring must be undertaken annually for a minimum of five years, or one year after occupation of the final (200th) dwelling, whichever is longest. The Travel Plan must be primarily be monitored by the use of traffic counts, as the resident response rates of Travel Plan surveys on residential developments tend to be very low, even with the use of an incentive. Also the use of traffic counts allows an instant comparison with the expected trip rates provided in the Transport Assessment, as the Travel Plan was mentioned as one of the highway mitigation measures.
9. There is no reference to producing a Full Travel Plan after the baseline monitoring has been completed. The Full Travel Plan must contain the site-specific baseline data and some revised measures should be submitted for approval on occupation of the 100th dwelling.
10. The provision of the monthly rail ticket to Bury St Edmunds, or bus or cycle voucher of equivalent value is a good measure and welcomed by SCC. However, the rail voucher should also cover the cost of travel to Stowmarket as well, due to the existing bus services linking Thurston to Stowmarket being limited for commuting. Also each dwelling should be able to redeem up to two vouchers, as more than one working adult may reside in the dwelling.
11. A revised Travel Plan that takes into account the comments raised above, should be submitted for approval prior to the determination on the application. These revisions need to comply with National Planning Policy Framework paragraph 32. Other relevant paragraphs include 34, 35, 36 and 37 as well as the "Travel Plans, Transport Assessments and Statements in Decision-taking" section of the 2014 Planning Practice Guidance.
12. In addition, a good 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).
13. There is potential for increased benefits through combining Travel Plan investment between nearby developments that should be investigated, if or when such other developments are delivered.

Yours sincerely,

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

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

Dear Sir/Madam,

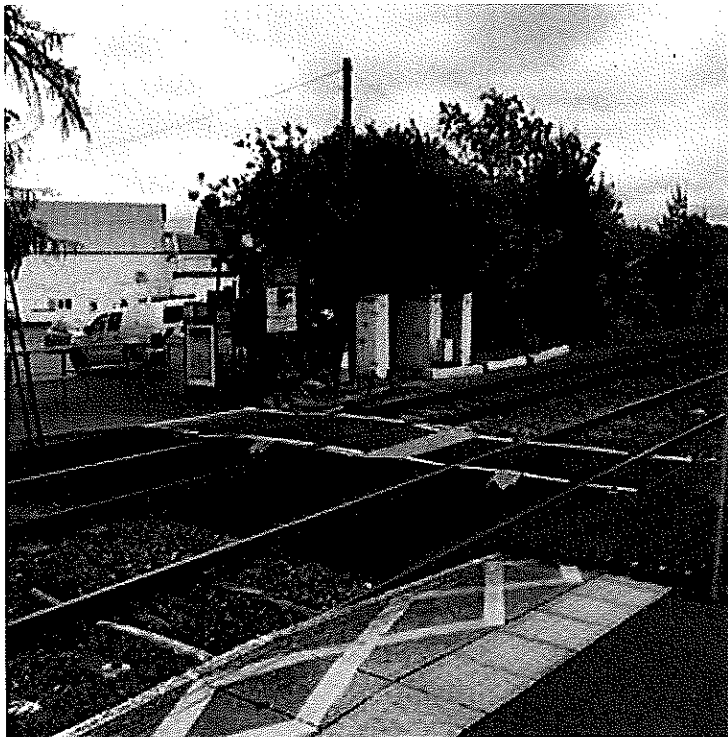
Thank you very much for consulting with Network Rail in regards to application 5070/16 and offering us the opportunity to comment.

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

Kind Regards,

Wasil Khan
Town Planning Technician, Property

Network Rail
5th Floor
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 15:10
To: Town Planning SE
Subject: Consultation on Planning Application 5070/16 - Land at Norton Road, Thurston / response deadline 20/04/2017 / (anglia)

Correspondence from MSDC Planning Services.

Location: Land at Norton Road, Thurston

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

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

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

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

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

be found in detail in the Mid Suffolk Local Plan.

We look forward to receiving your comments.

Emails sent to and from this organisation will be monitored in accordance with the law to ensure compliance with policies and to minimize any security risks. The information contained in this email or any of its attachments may be privileged or confidential and is intended for the exclusive use of the addressee. Any unauthorised use may be unlawful. If you receive this email by mistake, please advise the sender immediately by using the reply facility in your email software. Opinions, conclusions and other information in this email that do not relate to the official business of Mid Suffolk District Council shall be understood as neither given nor endorsed by Mid Suffolk District Council.

The content of this email (and any attachment) is confidential. It may also be legally privileged or otherwise protected from disclosure. This email should not be used by anyone who is not an original intended recipient, nor may it be copied or disclosed to anyone who is not an original intended recipient.

If you have received this email by mistake please notify us by emailing the sender, and then delete the email and any copies from your system.

Liability cannot be accepted for statements made which are clearly the sender's own and not made on behalf of Network Rail.
Network Rail Infrastructure Limited registered in England and Wales No. 2904587,
registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

