

THURSTON NEIGHBOURHOOD PLAN 2018 - 2036 Reg 14 Pre-Submission Draft

Comments from Mid Suffolk District Council

Colour used	Meaning
	Agree/straightforward change
	To be passed onto stakeholders
	No action required

Page etc.	MSDC Comment	Comments	Action to be taken
Contents Page	This should include a list of all NP Policies and, as appropriate, key maps and figures. You may also want to include a list of supporting documents.	Agree with this suggestion – Expand the contents page Section 9 & add a Section 10 to include supporting documents	
Numbers or bullets?	In places throughout the Plan we feel the use of bullet points or a table would be preferable to the current numbering system. The following para's refer: 2.36 / 2.52 / 2.60 & 2.62 / 2.68 to 2.73 / 5.10 / 5.15 to 5.16 / 5.22 to 5.24 / 5.26 / 7.26 / 8.25. Also suggest that para 2.38 could end with a colon, and then 2.39 to 2.45 appear as bullet points underneath.	It if makes the document easier to read then the change is acceptable. Preference is for bullet points – downside will lose the direct para number but agreement to change	
Para 1.1	"This document represents forms the Neighbourhood Plan for Thurston parish for the period 2018 to 2036."	Noted and wording changed	
Para 1.6	Needs to be updated to reflect the latest JLP timetable. A second Regulation 18 consultation document is due in late 2018 and a Publication Draft in Spring 2019	Noted and updated	

Para 1.8	"... and the Neighbourhood Planning Regulations 2012 (which were amended in 2015 <i>as amended</i>)."	Noted – change required	
Para 1.9	Text refers to map in Figure 1 below, but map is titled Figure 1.1	Agree – changed to ensure consistency Text changed to reflect 1.1	
Section 2	Is there any scope to shorten this section and put the detail in an appendix?	It is felt that this is an important section for setting the scene and as such should not be removed and placed into an appendix.	
Para 2.1	" <i>Domesday</i> " not "Doomsday"	Noted & actioned	
Para 2.3	A suggestion only but could this be re-worded as follows: " <i>The 1841 Tithe Map paints a picture of the farming community. With its chalky soil and rich boulder clays, together with its low rainfall, it is an ideal location for growing cereals. Being primarily an arable farming area requiring a large labour force, the majority of the population depended upon agriculture for a living. This would include</i> "	Agreed with suggestion as it does not detract from the overall meaning of the sentence and actioned.	
Para 2.6	Suggestion ... "Most of the agricultural land in Thurston is now farmed <i>managed</i> by farmers who do not live in Thurston <i>locally</i> and ..."	Agree to change to "managed" only since it refers to "Most... who do not live in Thurston." Disagree with the second change as see no reason to add <i>locally</i> as this has not been qualified	
Para 2.6	" <i>Cavendish Hall</i> "	Already noted	
Para 2.7	"...15 th <i>Century</i> ..."	Agree and actioned	
Para 2.10	"... own facilities on the <i>Ixworth Road</i> "	Agree - change to Ixworth Road	
Para 2.24	Delete "big" ? ("...which has led to its growth as a big service centre ...")	Replace with "key"	
Para 2.32	The last sentence reads " <i>This is particularly significant given that the figures are for those aged between 16 and 74 and Thurston has a high proportion of</i> "	This is not related to the previous points being made and should be removed. Actioned by removing the	

	<i>retirees.</i> Q: What does this mean?	sentence	
Para 4.5	"The area separate from <i>outside</i> the settlement boundary is defined as"	Intention is that the places separate from the village could be developed on the proviso that such development was appropriate for countryside activities. Amend sentence to read "the area outside the settlement boundary....."	
Para 3.4	Perhaps show objectives in table format so they stand out from surrounding text. This would also be consistent with how these appear later in the plan at the start of each section.	Agree that table might be better and more consistent with the document as a whole. The objectives of the NP were identified through engagement with the community.	<u>Place the Objectives into a table with the heading "Objectives of the NP" all in italics and the objectives below – Printers to action</u>
Para 5.26.6 & 5.26.7	(See also comment above under ' <i>Numbers or bullets?</i> '. Appears that the end of 5.26.6 and start of 5.26.7 have been broken in error. 5.26.7 should start with "Where it is not possible"	It has previously been identified that some text has been duplicated and now removed. Bullet points have been previously agreed as preferable.	
Para 7.18	" <i>cycle route</i> " rather than " <i>cycleway</i> "	Agree to the amendment	
Para 8.24	Do you have any source that can be referred to for this?	This is a nationwide issue/problem with regards to the decline of both species. Suffolk Wildlife Trust in their response to the consultation ask for an amendment to Policy 11 in particular for integrated boxes for swifts.	

Specific comments

Page etc.	MSDC Comment		
Page 5	After para 1.9 the Plan should set out the background to its preparation - for example the consultation that has been carried out and the evidence that has been gathered. +	<p>Agree to add in sections at Eg 1.9 – 1.14 to cover preparation of the plan and key stages of the plan. 1.15 will then be the monitoring stage.</p> <p>The preparation of the plan inc engagement etc will be covered more fully in the Consultation Document that will be a supporting document at Reg 16 Submission.</p>	
Para 2.8	Re a new, larger primary school ... Need to say if a site has been identified for this and if so where is it. If not what will the process be for finding a site?	<p>Agree –insert wording to denote that a preferred site has come forward following the submission of 2 planning applications for a new primary school.</p> <p>If the decision of a new site comes prior to submission of the document then the wording can be amended.</p>	
Para 2.27	It would be useful to say where these planning permission sites are.	Agree – make a reference to figure 9.2 - Pages 69-70	
Para 2.64	The NP is an opportunity to identify a site or sites to meet this demand.	Agree – add in a new paragraph 6.16 to demonstrate where allotments could be provided to satisfy this demand	
Para 2.73	Need to refer to the evidence for this. How has this been decided?	Amend wording: Following extensive public consultation the following have been identified as future requirements	
3 Vision & Objectives	It would be better if the Vision and Objectives were set out earlier in the Plan. (see also comment below re para 3.3)	Agree that the order of Sections 2 and 3 should be changed	<u>Change order - Printers to action</u>
Para 3.3	Could say more about how the vision has been established. // The vision itself is too long. It could be just the first paragraph. Then say “ <i>To achieve this</i>	Disagree – without the whole context the vision could just be another village in Suffolk. The context relates	

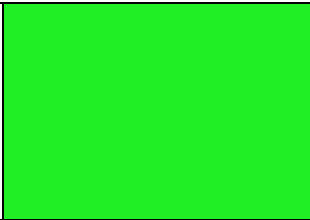

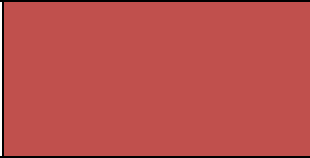




	<i>we envisage.</i> ” with remainder as before.	directly to Thurston as a whole.	
Para 3.3 (5th para)	There is a reference to: “ ... a new development in the centre of the village. [etc.] ...” Qstn: Where will this be?	<u>Change to read “ on a new development on the site of The Granary by the Railway Station</u>	
Para 3.3	[The penultimate paragraph] Q: Is this an allocation?	No – it is part of the vision not an allocation but agree to insert wording ‘created in 2017’ to provide clarity that it is not an allocation.	
Para 4.2 (Para 4.6)	<p>“ <i>The Plan allows suitable development adjacent to the settlement boundary.</i>”</p> <p>Qstn: Does the PC want to provide for development on as yet unidentified sites adjacent to the settlement boundary? There would be more certainty to restrict development to sites within the settlement boundary, sites with permission and allocated sites.</p>	<p>Agree that this leaves us vulnerable.</p> <p>The NP does not want to provide for development outside the “new” settlement boundary.</p> <p>The general spatial strategy is to focus development within and adjacent to the settlement boundary.</p> <p>The paragraph to be reworded to make reference to the new settlement boundary, which now includes the sites with planning permission – wording changed to make sure it is compliant with MSDC Core Strategy Policy CS1</p>	
POLICY 1	<p>A: See previous comments. A general ref’ to sites adjacent to the settlement boundary will leave the door open to speculative proposals and creates uncertainty</p> <p>C: That word “adjacent” again</p>	<p>It was been agreed that the settlement boundary should be redrawn to include the permitted sites.</p> <p>As such this will allow the policy to take out reference to generally allowing further sites adjacent to the settlement boundary.</p> <p>It is understood that the purpose of a settlement boundary is to provide the delineation of where the strategy for</p>	

		<p>what is permissible changes.</p> <p>4.5 will be reworded to take this into account.</p> <p>As such this overrides the amendment as mention in the resident response paper- regarding agricultural use</p>	
POLICY 1	<p>D: Outside?</p> <p>D(b): Need to be more specific about acceptable uses – commercial could include retail, for example.</p>	<p>‘Outside’ should be retained in Policy 1D, i.e. ‘Development proposals on sites that are clearly separate from outside the settlement boundary will not be permitted unless:…’, whilst MSDC cite retail, a suitable use in the rural area could be a farm shop. As the NP does not want to restrict such use, Policy 1Db is to be amended as follows:</p> <p>‘They relate to the retention of existing businesses and the provision of new commercial business activities that are appropriate in the countryside;’</p>	
Para 5.2	Say where the large-scale developments are. Last sentence. It would be useful to give more detail here.	Amend to show reference to the policies map.	
Para 5.2	What are the issues and what is proposed to help?	This is covered in the infrastructure section as mentioned in the paragraph.	
Para 5.3	Provide a reference to the source of these comments.	Ref is the MSDC letter from Steve Merry	<u>Added but need to look at numbering of footnotes - Printers</u>
Para 5.12	Qstn: Which SPD are you referring to? There is no current Affordable Housing SPD for Mid Suffolk.	Amend the sentence to read – “the Alterations to the Mid Suffolk Local Plan – Policies for Affordable Housing as adopted by the District	


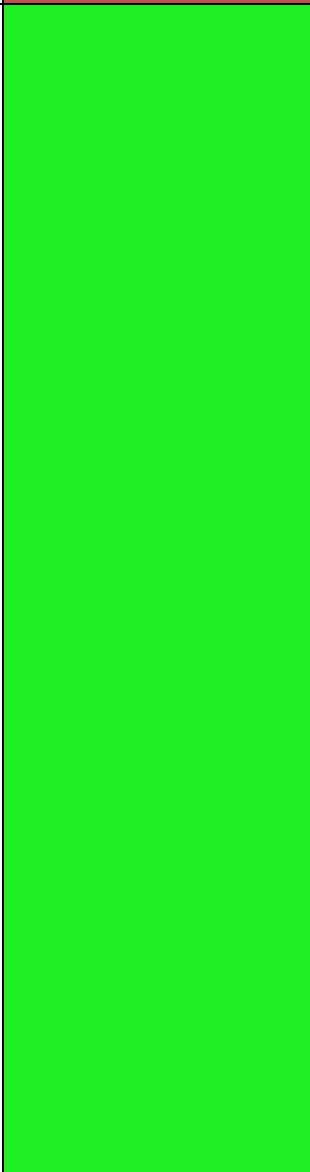
		Council on 13 July 2006”.	
Para 5.14	Can we assume that the 'Housing Needs Survey' will be made available as supporting document?	<p>Amend to read 'The Thurston Housing Needs Survey,...’</p> <p>Add the document to the list of supporting documents in the front of the NP.</p> <p>The Housing Needs Survey is already uploaded onto the website and forms part of the suite of documents available to all to read</p>	
Para 5.18	Could this be developed into a policy or proposal?	This is already covered under Policy 3.	
POLICY 2	A: Last sentence is overly complex	<p>Agree - it could result in an overabundance of 1 and 2 bed properties, the policy, as previously agreed, is to be reworded as below:</p> <p>'Within the context of Thurston's need, all housing proposals of five or more units must reflect the need across all tenures for smaller units particularly accommodation suitable for older people'</p>	
POLICY 2	<p>B: May be better not to say how exceptions can be made and remain silent on this point</p> <p>C: OK as an aspiration but “encourage” has no teeth</p> <p>D: OK as an aspiration but “encourage” has no teeth</p>	<p>B. Disagree as this helps to provide the necessary flexibility that might be needed over the lifetime of the plan should a different mix be required.</p> <p>Disagree - Professional Partner has advised that NP Guidance from Locality ('Writing Planning Policies') says: “encouraged’ or ‘supported’ - many plans use these terms to convey a positive approach to development and generally ‘encouraged’ is considered as being</p>	

		<p>the more proactive.”</p> <p>Concern that ‘supported’ suggests it will be supported no matter how much it is in conflict with other policies.</p>	
POLICY 3	OK as an aspiration but “encourage” has no teeth in development management.	Disagree – see comment above	
Fig 5.1	These extracts from the Suffolk Design Guide are out of date. A new one is due to be published. There may also be copyright issues with using the drawings.	<p>Noted but SCC has only advised that there is a project underway to update design guidance in Suffolk which as of yet has not been completed.</p> <p>Reference has already been made to this in the text.</p>	
POLICY 4	B: Say “shall” rather than “encouraged to”	<p>B Disagree - Professional Partner has advised that NP Guidance from Locality (‘Writing Planning Policies’) says: “‘encouraged’ or ‘supported’ - many plans use these terms to convey a positive approach to development and generally ‘encouraged’ is considered as being the more proactive.”</p> <p>Concern that ‘supported’ suggests it will be supported no matter how much it is in conflict with other policies.</p>	
POLICY 4	B[a]: Say the maximum length	<p>B(a) This would then be too prescriptive and contrary to the NPPF.</p> <p>Agree that the wording could be amended to ensure that it only relates to residential streets</p> <p>Insert “...closes (excluding main access roads) that</p>	

POLICY 4	B[c]: How will over-developed be judged?	This judgement will be made in accordance with the LPA decision making process once an application has been submitted and will be judged in accordance with the NPPF and Local Policies.	
POLICY 4	B[g]: Might be a problem, especially when a brick wall would be a security need and also better looking	The NP disagrees with this statement – see Key Detracting Features Summary from the Character Assessment. The commencement of B states that development proposals are encouraged to: The phrase “ and also better looking” is also considered a personal preference.	
	C: “encouraged” has no teeth for development management – may be better to say “required”	Agree – wording change to “will be supported”	
Para 6.7 to 6.10	This is a direct repeat of paragraphs 2.60 to 2.63. Is this necessary? You could just say (para 6.7) “In Section 2 (paragraph 2.60 to 2.63) we identified a range of outdoor community facilities. A new facility bringing ...”	Remove as it does not bring anything further to the table by being a direct repeat.	
Para 6.13 (now 6.10)	Need to say what the source is.	BMSDC Services and Facilities Audit August 2017 – look at their Strategy for Leisure - 2017	
Para 6.14	What is the evidence for this? What standards are being used?	Vicky – see Tony Bass for this	
Para 6.15 (new 6.12)	Proposed play areas - it would be helpful to show these on a map.	They are already mentioned as per the Policies Map showing detailed locations as per Figure 9.2 (new reference Figure 14).	

<p>Para 6.18 (new 6.16)</p>	<p>See also our comment above re para 2.64. The NP is an opportunity to identify a site or sites to meet this demand.</p>	<p>Amended to state suitable sites - 6.16 “Sites A, B and C on Figure 9.2 (Page 70) would cater for the need identified through the Neighbourhood Plan consultation process.”</p>	
<p>POLICY 5</p>	<p>Under ‘B’ and ‘C’ – re-letter starting at ‘a’ each time .. of use some other alpha / numeric reference</p>	<p>Agree to amend referencing</p>	
<p>POLICY 5</p>	<p>Policy 5 C is aspiration rather than a Policy / Proposal</p>	<p>The NP disagrees as there is a lack of such facilities within the Parish and within the ward of Thurston (current and future (2019)).</p>	
<p>Page 48 / 49</p>	<p>Should the heading before para 7.17 be “<i>Cycling and Walking</i>”. This might then flow better into the headings on pages 49 and 50.</p> <p>Suggest presenting Walking Proposals (7.20.1 etc.) and Cycling Proposals (7.20.5 etc.) in a table or as bullets.</p>	<p>Agree to amendment at 7.17 (new 7.16) as the whole text refers to both Cycling and Walking</p>	
	<p>Qstn: How will these walking and cycling proposals be delivered?</p>	<p>Through CiL?</p> <p>There is an expectation that S106 will not be able to deliver all of the proposals and as such the Parish Council will look to use external funding for them – one of which may be CiL</p>	
<p>POLICY 6</p>	<p>Should this appear after the ‘proposals’ referred to above?</p>	<p>Agree it should be after both walking and cycling proposals. Policy 6 to be moved to after Cycling</p>	
<p>Para 7.23</p>	<p>Say “<i>A transport assessment was commissioned to</i>” and delete last part of sentence.</p>	<p>Disagree - Think it better as it is as the amended wording will water down the original text.</p> <p>It must be remembered that it was only after pressure from the Parish Council and the Neighbourhood Plan</p>	

		Team that the six significant applications were dealt with on a cumulative basis.	
POLICY 7	<p>See comment about NPPF in covering letter. As appropriate, you may need to be updated this to refer to the new NPPF published in July 2018.</p> <p>B: Qstn: How are these improvements likely to be delivered?</p>	<p>Noted that if reference to the NPPFs to be made this should now refer to paras 109 and 111 rather than para 32. However, Policy 7 has already been reworded with reference to SCC comments</p> <p>NP comment – might serve better to re-order where Policy 7 comes in the NP i.e. before Parking?</p> <p>The improvements mentioned in Policy 7, should work be required, would be expected to be financed under either S106 or CiL.</p>	<p><u>Move Policy 8 to come before Parking Section</u></p>
POLICY 8	Not sure if A is required as this is covered by B.	<p>Disagree in principal as A deals with things in general; B then directs to the specific.</p> <p>However, it has been agreed, in respect of comments coming forth from SCC comment, to take out reference to residential from B. The thrust of your comment, i.e. A address the general requirement and B then directs to the specific.</p>	
	Suffolk CC may comment on 'D'. It is not normally SCC policy to provide parking within a school site.	<p>SCC did not have any further comment to make on this matter and given that the PC is in direct contact with the project team on this specific project, agreement is that this should stay in.</p>	

<p>Page 57</p>	<p>“Protection and enhancement the village ... “ refer to evidence on which this has been based - Landscape Character Assessment?</p>	<p>Evidence is on the website and will be included within the ‘supporting documents’ part of the NP contents</p>	
<p>Para 8.5</p>	<p>This states that “<i>It is paramount that heritage areas and green spaces ... are protected ...</i>” Qstn: What is meant by the term ‘heritage areas’?</p>	<p>It was felt that these are areas in the village that reflect the past of Thurston and the aim is to ensure they are protected and therefore retain their ‘heritage status’ in the village’s eyes.</p> <p>The NPPF Paragraph 184 states that “Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognized to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”</p> <p>It is noted that the majority of the listed buildings to be found in Thurston are situated within the older areas of Thurston, Great Green, Planche area, Church road, Beyton Road which are away from the centre of the village. The exceptions are the Station Building, the Fox and Hounds and Burnt Cottages.</p> <p>But agree that policy 9 – and its reasoned justification – does not relate to heritage. Whilst, there are clusters of listed buildings that make up heritage areas, these are already protected through their listing. Policy</p>	

		<p>9 however relates to the environment and protecting that which is somewhat different.</p> <p>Agree to take out reference to 'heritage areas' from paragraph 8.5.</p>	
POLICY 9 (B)	<p>Qstn: Why five metres?</p> <p>Should the policy specify native species?</p>	<p>The NPSG feels that this is an appropriate amount to provide a significant buffer between the built environment and the countryside to which the development will abut. The size specified will allow a suitable buffer coming forth.</p> <p><i>Noted this was supported by Suffolk Wildlife Trust and as such the wording will stay.</i></p> <p>Good idea to specify native species to reflect local characteristics. Wording to be changed to read 'a native species ...'.</p>	
Para 8.6	<p>See comment about NPPF in covering letter. As appropriate, you may need to be updated this to refer to the new NPPF published in July 2018.</p>	<p>Updating required – should refer to paragraph 99</p>	
POLICY 10	<p>The reference to 'Green Belts' needs to be deleted. Green Belts are completely different to Local Green Spaces.</p>	<p>It is noted that Paragraph 101 states that Policies for managing development within a Local Green Space should be consistent with those for Green Belts” and that paragraph 133 provides further definition as to the aim of protection of Green Belts “The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.</p> <p>Disagree that the reference to Green</p>	

		<p>Belts in the context of development for Local Green Spaces is inaccurate</p> <ul style="list-style-type: none"> - the NPPF green belt policy says that construction of new buildings in the green belt is generally inappropriate, with several exceptions. These include: <ul style="list-style-type: none"> - “the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; and - the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; and - the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.” <p>This therefore allows the re-provision of play equipment and some expansion of play areas on Local Green Spaces.</p> <p>The wording remains as is.</p>	
	<p>Should Policy 10 appear after para 8.7 and before the detailed maps (pages 60 - 64)? The policy could then say: “<i>The following areas shown on the Proposals Map, and in more detail in paragraphs xx to yy, are designated as Local Green Spaces.</i>” Otherwise, it’s all a bit back-to-front!</p>	<p>Disagree as the policy should be consistent with the rest of the document as written. Principal has been that the Policy follows the text.</p>	
<p>POLICY 11</p>	<p>A: This is unnecessary <small>SEP</small></p>	<p>Disagree, as not all development is residential.</p> <p>It is a catch all for all development</p>	

	<p>B: Delete "<i>In particular</i>". Also, "<i>Shall</i>" is stronger than "<i>should</i>"</p>	<p>with policy B referring particularly to residential.</p> <p><i>Note: that SCC and Suffolk Wildlife Trust the Policy as written</i></p>	
	<p>B (f): This could be put in P12</p>	<p>Agree "New residential development proposals shall..." provides a stronger stance</p> <p>Agree that it should be moved especially as the footnote reference 16 is in this section</p>	
<p>POLICY 12</p>	<p>C: Say "<i>all sites</i>" rather than "<i>sites in rural locations</i>" - definition of rural is arguable.</p>	<p>Agree – this provides greater protection</p>	