

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

Babergh and Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

18th September 2019

[email: localplan@babergmidsuffolk.gov.uk](mailto:localplan@babergmidsuffolk.gov.uk)

Dear Sirs,

Re: Babergh and Mid Suffolk Joint Local Plan – Preferred Options Briefing for Neighbourhood Plan Groups

Consultation period ends: 4.00pm on 30th September 2019

The Parish Council welcomes the production of the Draft Joint Local Plan (JLP) which is aimed at articulating policies to influence delivery across the following four priority areas that will have the most positive impact on the future of both districts for the period to 2036:

- Housing
- Economy
- Environment
- Health, Communities and Infrastructure.

Furthermore, it recognises that in response to the NPPF standard methodology there is a requirement for both districts to accommodate identified housing needs in accordance with national policy standards and notes that preventing growth across both Districts is not an 'option'.

The Parish Council does however take exception to the statement within the Joint Local Plan Preferred Options that it will have regard to emerging neighbourhood plans being prepared in the District and that it will provide a context for new neighbourhood plans to be prepared against.

Thurston Parish Council maintains that the proposals for the growth of Thurston fail to take full regard of the policies contained within the Thurston Neighbourhood Development Plan (NDP) which, having successfully passed a referendum vote on 12th September 2019, should become part of the development plan and should be considered when determining planning applications. During examination stage, the Examiner concluded that the Thurston NDP as submitted met the Basic Conditions and would provide a strong practical framework against which decisions on development can be made. As such the Parish Council contends that it is to be regarded as a material consideration in the consultation process on the Draft JLP.

1. **Settlement Hierarchy** – Thurston Parish Council accepts its status as a Core Village and is supportive of the principle that the scale and location of growth of development will be based upon the role of settlements within the settlement hierarchy as produced within the Draft Joint LDP.
2. However, any such development should take into account the capacity of physical and social infrastructure or new/enhanced infrastructure as well as having regard to the built and natural environment.
3. The Draft Joint LDP has allocated Thurston a settlement boundary which is in direct conflict with that of the Thurston NDP which was successfully passed at referendum on 12th September 2019 and is now expected to come into force as part of the statutory development plan for the area.

4. Thurston NDP POLICY 1: THURSTON SPATIAL STRATEGY states that all new development in Thurston parish shall be focused within the settlement boundary of Thurston village as defined within the Policies Maps on pages 76-77 of the Thurston Neighbourhood Plan: <https://www.midsuffolk.gov.uk/assets/Neighbourhood-Planning/Thurston-NP-Ref-Version.pdf>
5. The general approach in the Thurston NDP, fully supported by the Parish Council, has been that growth will be focused on the five significant sites which were granted planning permission as of 2017 (which are located within the settlement boundary as amended by the NDP) and on small-scale infill sites within the settlement boundary. These sites, with approval for development are expected to provide high quality schemes which generally enhance the public realm and improve accessibility for pedestrians and cyclists. Sites shown in the Draft Joint LDP that are located outside the settlement boundary will neither enhance nor protect the village facilities due to their location.
6. Within the settlement hierarchy shown for Thurston within the Draft Joint LDP there are a number of sites that are shown to be outside of the settlement boundary (LA087, LA086 and LA085) that have come forward as part of the allocation of sites along with a number of sites (LA084; LA089; LA088 and LA090) that are currently within the planning system.
7. The Parish Council challenges the premise that the former three sites should be considered as Allocations when they are located outside of the settlement boundary of the Thurston NDP, as approved at referendum.
8. If the latter four sites are included as part of the allocation (Consultation Document dated July 2019) the Parish Council questions the rationale in not including the Hopkins Homes site for 175 homes on land to the south of Norton Road and the Linden Homes site for 200 homes on land to the north of Norton Road with both being granted planning permission after April 2018. As the word allocation has been used on these sites, it surely follows that the Hopkins Homes and Linden Homes sites should also be included.
9. The Parish Council therefore challenges the non-allocation of the land that applies to SS0027 and SS0826 (as per the 2017 consultation) as both omissions misrepresent the growth impact on Thurston since the consultation process of the Draft Joint LDP.
10. **Minimum Housing Numbers for NP Areas-** Thurston's quoted figure of 1,468 includes outstanding planning permissions granted as at 1st April 2018.
11. The Parish Council draws reference to the above comments made under 8 and 9 and refers to the email from Corporate Manager, Strategic Planning, Babergh District Council & Mid Suffolk District Council – Working Together, of 15th July 2019 detailing that there were 490 dwellings with outstanding planning permissions at 1st April 2018 that had not yet been built, plus four sites identified without planning permission (LA085 (25 dwellings), LA086 (110 dwellings), LA087 (200 dwellings) and LA089 (200 dwellings)), totalling 535 dwellings. These equate to 1025 and not the 1468 as stated within the document.
12. The numbers granted planning permission since the commencement of the consultation process of the Draft Joint LDP are outlined under Item 14 below and equate to 972 and not the 490 as identified in the email of 15th July 2019.
13. The Parish Council therefore challenges the minimum growth figure for Thurston as being flawed as it has failed to consider the very recent growth rate in Thurston and has failed to consider new 'windfall' development that has been allowed since 2017.
14. Planning permission on those sites that are currently in the planning system with planning permission but not yet built or occupied:

Planning Permission Reference	Site Address	Net Outstanding Dwellings
DC/17/03941/FUL	51 Barton Road	0
DC/17/04938/OUT	Poplar Farm Lane -Off Norton Road	1
DC/17/06257	Lodde, Thurston Place, Beyton Road	1
DC/17/03268/OUT	Land south of Barrells Road	6
DC/17/04197	Poplar Farm, Great Green	1
M/0277/18/PRN	Barn at Moat Farm - Great Green	2
M/0363/18/PRN	24 School Road	1
M/0933/16/OUT	Popples, Barrells Road	1
M/1009/09/FUL	Land at 13 School Lane	1

M/2026/13/FUL	Land at Cedars Close	1
M/2613/11/OUT	Thurston Granary, Station Hill	97
M/2630/14/FUL	Land at Cedars Close	3
M/2716/13/FUL	Tinkerbells Day Nursery (South East), 64 Barton Road	1
M/3367/12/FUL	Land adjoining Thedwastre Place, Station Hill	3
M/3843/16/FUL	Land adjacent to the Firs, Church Road	1
M/4260/16/FUL	The Hollies, Church Road	1
M/4471/16/PRN	Harveys Garden Plants, Great Green	2
M /4800/16/FUL	Plancheway, Hollow Lane	0
M /5010/16/OUT	Land to the south of Norton Road	175
5070/16/OUT	Land on the North side of Norton Road	200
4942/16/OUT	Land to the east of Meadow Lane	64
4386/16/OUT	Land to the west of Barton Road	129
4963/16/OUT	Land to the west of Ixworth Road	248
DC/17/02782/OUT	Land off Church Road (The Firs)	15
DC/18/00277	Moat Farm, Great Green	2
DC/18/01839	Highmead House, Ixworth Road	4
DC/18/01042	The Hollies, Church Road	1
DC/18/04463	Rojulina, Hollow Lane	2
DC/18/04980	Winchmore, Sandpit Lane	1
DC/1/05281	Popples, Barrells Road	1
DC/19/00197	Rojulina, Hollow Lane	1
DC/19/00473	Rojulina, Hollow Lane	2
DC/19/02033	Corner Cottage, Hollow Lane	2
DC/19/02224	Navarac, Great Green	2

15. Given the levels of growth in the planning pipeline; the previously raised fundamental concerns of the Suffolk County Council Highway's Team about highway capacity and the need to deliver major new education infrastructure in the form of a larger primary school on a new site, the Parish Council contends that Thurston should not be expected to accommodate any additional growth outside of the settlement boundary as defined by the Thurston NDP.
16. Thurston Spatial Strategy contains a provision for the support of development proposals outside of the settlement boundary to come forward that meet specialist housing and care needs on sites where it can be demonstrated that no available and deliverable site exists within the settlement boundary.
17. This is further expanded within Thurston NDP POLICY 2: MEETING THURSTON'S HOUSING NEEDS and POLICY 3: MEETING SPECIALIST CARE NEEDS both of which are designed cater, in particular, for the needs of first-time buyers, those wishing to downsize and those needing care.
18. **Highway Infrastructure** - as has been set out by the Parish Council in response to significant planning applications for Thurston, it was considered that approval of 818 dwellings at the Mid Suffolk Planning Referrals Committee Meeting on 1st November 2017 was a level of development that was of such a strategic scale that a cumulative approach was required through the planning process to provide improvements to mitigate against any severe impacts to ensure that they did not result in unsustainable growth of the village.
19. The Parish Council is concerned that additional growth such as that now being considered within the Joint LDP is unsustainable, unsafe and will have a severe impact on the Highway Network in and around Thurston.
20. As Suffolk County Council (SCC) Highways Authority have not indicated as to whether there are any further mitigation measures that have been identified that will provide solutions to the severe negative impact that additional growth will have on the Highway Network and draws reference to the letter submitted by SCC Highways (Steve Merry (SCC) to Ben Elvin (MSDC) 13 Oct 2017) who raised concerns that, following mitigation measures being implemented (for those planning applications approved at the meeting of 1st November 2017), the roads in and around Thurston will be operating at capacity if all the developments go ahead. In his letter it is stated:
- "Any future development in Thurston must, in the Highway Authorities opinion, address the following constraints;
- No further capacity can be provided at the A143 Bury Road / Thurston junction within the existing highway boundary for traffic traveling to / from the Thurston area.

- The C692 / C693 Thurston Road (Fishwick Corner) cannot be improved further in terms of either road safety or capacity due to the highway boundary constraints.
 - Any significant future development is likely result in the C560 Beyton Road / C692 Thurston Road / U4920 Thedwastre Road (Pokeridge Corner) junction reaching its theoretical capacity. This work has not investigated the potential for mitigation, but the site has similar highway boundary constraints as the other junctions.
 - The C291 Barton Road under the rail bridge is at capacity and without mitigation this may restrict future development in the area.”
21. The position stated above has been referenced in the letter submitted by SCC Highways (Samantha Harvey (SCC) to Vincent Pearce (MSDC) of 22nd May 2019 (Reference Planning Application DC/19/02090 – Site Reference LA087) which has confirmed that the improvements planned for the permitted developments north of the railway line were only to a level to mitigate their harm and had little, if any, residual capacity in terms of congestion and road safety. The letter further identifies that a suite of improvements, in the opinion of the Local Highways Authority, mitigated the harm of these five developments but took the infrastructure to its maximum in terms of safety and capacity.
22. Whilst the Parish Council acknowledges that planning applications coming forth will be expected to provide details of proposed infrastructure to be secured through planning obligations as part of the proposed development, there is no acknowledgement within the Draft JDP of the requirement for the following to be considered as essential infrastructure to accommodate growth coming forth:
- Highway junction improvements at Fishwick Corner;
 - Highway junction improvements at Pokeridge Corner;
 - Highway junction improvements at Beyton Road / Barton Road;
 - Widening of footway under the railway bridge and realignment of the carriageway;
 - Safe pedestrian access along the priority system along the railway bridge on Thedwastre Road.
23. In addition, there is no mention of the impact on the decision taken by Suffolk County Council to implement changes to its School Travel and Post-16 Travel Policy by only providing children aged 4-16 years old with transport to their nearest school with an available place (phasing in the policy from September 2019). This will significantly impact on the Thurston Community College which has a very large catchment area. Evidence has shown that a significant number of parents have continued to support their school choice and as such there will be a negative impact on the rural infrastructure with the increase in the numbers travelling to and from school via car. No account of the increase in traffic movement in any of the villages making up the catchment area has been given weight by this strategic plan and the Parish Council would request that this be included within the overall strategy for the pattern, scale and quality of growth to ensure that the cumulative impact of such development on Highway Safety be addressed.
24. **Safe, Sustainable and Active Transport** – the Parish Council supports the principle that all development should be sustainable and accessible to all.
25. The Parish Council is fully supportive of the desire to promote sustainable travel further and is concerned that the Draft Joint LDP fails to make provision for and consider the impact on passenger safety on the Barrow Foot Level Crossings at a number of railway stations within the District. For Thurston, the increase in the numbers using the railway station from future development will negatively impact on the risk to users of the railway. The Parish Council draws reference on the email submitted on 30th August 2019 from Nick Donoghue of Network Rail to Vincent Pearce of MSDC Planning Department, which has stated that the most recent proposal for 210 new dwellings is likely to increase the amount of level crossing users increasing the risk to the operational railway.
26. The Parish Council is concerned that no reference is made within the document to the requirement to ensure that users of the railway line are able to do so in a safe manner and would request that to reduce the dependency upon private vehicles, investment in such infrastructure is regarded as key infrastructure.
27. The Parish Council seeks further reassurances that the Local Planning Authority will undertake measures to ensure that for all significant planning applications, the most up-to-date information on the cumulative impact on the railway station from development planned is obtained from Network Rail.
28. **Education Provision** – the assessment of Thurston makes reference to a new primary school (including a pre-school for 30 places) already planned for Thurston which is to be funded by Section 106 agreements from existing commitments.
29. The Parish Council is concerned that the Draft JLP has failed to demonstrate that the further growth being considered within the JLP has assessed the impact on primary educational infrastructure. It was agreed that, to provide an adequate educational infrastructure for not only the five significant applications of 2017, but also the

applications currently in the planning system (as at 2017), that a new school would be required with a capacity of 420. The current school has a PAN number for 2019/20 of 30 giving a potential roll of 210. Using Suffolk County Council matrix for approvals within the planning system a further 208 places are required. The additional developments within the JLP will give rise to a potential further 133 primary school pupils which is not taken into account in the determination of the size of school being built.

30. Whilst Suffolk County Council Schools Infrastructure Team have confirmed that the County has 'master planned' the new school site for future expansion, if it were required, to 630 primary places there has been no consideration as to how the size of such a primary school will impact on the current infrastructure of a rural village, including impact from daily vehicle movements, access to the school site by road and the pedestrian safety implications. This type of provision is clearly more suited to an urban area with a denser local population and superior public and sustainable transport provision for students and staff. The Thurston Neighbourhood Plan has been very clear on avoiding urban style development in a rural setting.
31. Using the same matrix for pre-school places, a new facility for 30 places is being offered with the capacity to expand to 60 should demand require expansion. SCC's matrix for approvals within the planning system shows the need for a facility with a placement for 85 places. The additional developments within the JLP will give rise to a requirement for further places which has not been taken into account in the determination of the size of the facility being considered
32. The Parish Council would like to see further consideration of strategic infrastructure such as education within the Draft JLP's Infrastructure Delivery Plan as it is felt that there appears to be a failure to consider the evidence base which would identify such constraints to growth.
- 33. Standards of Housing Build** – whilst the Parish Council notes the requirements for supported and special needs housing to comply with the Technical Housing Standards – Nationally Described Space Standards (as amended) which sets out the nationally described space standard for these and all new development to follow (LP06 and LP24 respectively), it is disappointed that the opportunity to exceed this has not been taken.
- 34. Building Homes for Life** – the Parish Council notes that reference is made within the supporting text to Building for Life (Building for Life 12) for residential buildings, it is again disappointed that Policy LP24 does not seek to incorporate a specific policy that allows the JLP to ensure new dwellings are designed to meet these needs or are able to demonstrate that a similar design standard has been achieved.
- 35. Health Provision** – the JLP makes reference to Woolpit Health Centre, which serves Thurston, requiring an extension to facilitate existing planning commitments and the JLP growth for the area. Woolpit serves not only Thurston, but also a wider catchment area. The Parish Council questions the reliance on extending facilities outside of the area of villages like Thurston as this approach fails to meet the needs of the identified aging population.
36. The Parish Council is also concerned that no mention has been made of the other Health Centres which serve Thurston. The West Suffolk Clinical Commissioning Group, in responding to development, makes reference to both Mount Farm Surgery and Ixworth Health Centre. It has been stated that both practices do not have sufficient capacity for the additional growth resulting from existing approved development and cumulative development growth in the area. Therefore it is expected that developer contribution, via the CIL processes, towards the capital funding to increase capacity within both GP Catchment Areas would be sought to mitigate the impact. Both of these surgeries lie outside of the Mid Suffolk area and the Parish Council would like reassurances that a statement of common ground to document the cross-boundary matters being addressed will be forthcoming and that there is a process to ensure that deficiencies in the provision of Healthcare for Thurston is addressed in timely and practical manner.
- 37. Biodiversity** - the Parish Council recognises the steps that have been taken to incorporate high standards of design and green infrastructure in new development coming forth but is concerned that whilst Policy LP17's aim is to ensure all development conserves and enhances biodiversity there is little acknowledgement of the need to ensure that all developments respond positively to climate change. The Parish Council would require the JLP to have policies that are capable of implementing measures that tackle the Climate Change Emergency on the ground. Currently, developers are merely required to adhere to current building regulations, and it is an expectation that the JLP should ensure that developers are compelled to build entirely passive houses with minimal energy bills etc. and to have systems in place for the harvesting of rainwater and grey water given that there is evidence that the trend for lower than average rainfall in the region of East Anglia is likely to continue.
- 38. Use of land allocated as educational land - land to the West of Ixworth Road** – the Parish Council would like to formally request that the land under planning application DC/18/03547 (see 39 below) that is not required by SCC for Thurston Community College use is allocated with the local plan as recreational use/community/ open space. The Parish Council is actively exploring options to preserve the land for community use.

39. The Parish Council draws reference on the informative note placed on the Approval for Reserved Matters DC/18/03547 - Application for approval of Reserved Matters following Outline Planning Permission Town & Country Planning (Development Management Procedure) (England) Order 2015 - Layout, Scale, Appearance and Landscaping pursuant to condition 3 of Outline Planning Permission 4963/16, for up to 250 dwellings, open space and associated infrastructure @ Land To The West Of , Ixworth Road, Thurston, Suffolk – “Education Land - Community Use - In the event that the education land (extension to college land to the south of the site and/or the land allocated for a new Primary School), secured by way of this permission, does not come forward for that purpose(s) the Committee would be minded to support a community based use for that land”.

Overall, the Parish Council would like to confirm that it does not support the site allocations within the Draft Joint Local Plan. It considers that the allocation of such increased growth for those villages like Thurston which have recently experienced significant growth are tipping points with no consideration of strategic planning for rapidity of growth and no understanding as to how to assimilate change. Further major changes such as those being considered in the Draft Joint LDP should be planned properly through further engagement with the Neighbourhood Development Plans being undertaken in both Babergh and Mid Suffolk in order to ensure that they do not result in unsustainable growth of rural villages and cause considerable harm.

The Parish Council expects that prior to further developments such as these being approved for Thurston, an overall study of the total impact on the community, not just in terms of road infrastructure and education, be commissioned to ensure that any further development for Thurston is economically, socially and environmentally sustainable.

Yours sincerely,

Victoria S Waples

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

