

THURSTON PARISH COUNCIL

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SENT AS AN E-MAIL

Mr. P Isbell
Chief Planning Officer – Sustainable Communities
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich IP1 2BX

5th November 2020

Dear Mr. Isbell,

APPLICATION FOR PLANNING PERMISSION - DC/20/01716

Hybrid Application: Erection of 171 No dwellings (inc. 60 affordable) together with associated access, infrastructure, landscaping and amenity space (applied for in full) and 9 No self-build plots(applied for in outline with all matters reserved, access to be considered)

Location: Land On The North Side Of, Norton Road, Thurston, Suffolk

Case Officer: Vincent Pearce

Reason for re-consultation: revised drawings dated 22.09.20

The Parish Council, having considered this application in light of the revised drawings, would like to confirm that it continues to strongly object to this application in its entirety. The changes that are shown on the revised drawings submitted for re-consultation are considered not to be sufficient to enable the Parish Council to change its original stance of objection the substance of which is repeated below.

It is considered that this application fails to be in conformity with the Thurston Neighbourhood Development Plan (NDP) in relation to housing numbers, character and design and therefore fails to provide demonstrable evidence that it meets the objective of sustainable development by meeting the needs of the present without compromising the ability of future generations to meet their own needs.

The Parish Council is disappointed that the applicants have failed to engage in any meaningful manner with the Parish Council over this application for increased numbers on the site. It acknowledges that a meeting was held with Representatives from Linden Homes on 13th March 2020 to discuss, or so the Parish Council thought, the content of the reserved matters to be submitted for the balance of the approved houses on this site. This application was submitted on 30th April (and validated within two days by the Local Planning Authority) which gave Linden Homes no time at all to consider or even respond to the Parish Council's comments.

At this meeting, the submitted plan was shown to the Parish Council which is in direct conflict with the original phase 2 expectations of this site and with the outline planning permission granted for the whole site. The Parish Council's viewpoint was made very clear to the representatives and yet despite there being clear opposition to the plan being discussed, the applicant failed to engage in any meaningful debate with the Parish Council or even the community in which the site is located. A copy of the notes taken at that meeting were submitted in the Parish Council's response dated 27th May 2020.

Thurston NDP, as has been documented widely, was adopted unanimously by members of Mid Suffolk's District Council (MSDC) in October 2019 and as has been stated has statutory weight which alongside the rest of the development plan must be the starting point for decision making.

The NPPF states that planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area. First and foremost, the Parish Council contends that the adopted NDP should therefore be afforded full weight in the determination of this application. The made Thurston NDP, as described by the examiner, and as supported by the parishioners of Thurston, is described as providing a strong practical framework against which decisions on development can be made and it is against this document that this application should be determined as it has significant weight.

Overall the Parish Council feels that the overall proposal fails to take into account the made Thurston Neighbourhood Development Plan (NDP) and has repeated all of the negative aspects that were criticised in Phase 1 for this site.

As the Thurston NDP prevails the publication of the Joint Local Plan Consultation Document which has just completed Regulation 18 phase, the Parish Council draws reference to the approved number of dwellings for this site which, as identified in the NDP is 200.

The Parish Council would request that the following comments be considered in the recommendation for refusal:

- There is a significant urban feel to the design which neither complements nor enhances the village. Overall the density, by increasing the numbers to be incorporated into the scheme has failed to not only respect the spatial strategy within the village but also that of Phase 1. The number of houses for this site has been identified as 200 in the NDP – the uplift is therefore contrary to the Policy Maps as shown in the NDP.
- The Parish Council holds that the layout as submitted will result in an overdevelopment of the area which will fail to enhance, protect, or conserve the environmental conditions of the area in which it is located and will fail to enhance or protect the local character of the area.
- Furthermore the layout fails to take into account guidance as given within Suffolk County Council's (2000 revised) Suffolk Design for Residential Areas, the Government's Manual for Streets and Manual for Streets 2 as well as Historic England's Streets for All documents. The Thurston NDP provides exemplar information on the street scenes that are acceptable – Chapter 5 Housing and Design – at page 39 has an example of Spatial Organisation that would be supported.
- The current proposal not only fails to take into account the Spatial Organisation as mentioned in the Thurston NDP and the Thurston Character Assessment 2017 but it would appear that the applicant has decided to use Page 38 of the Thurston NDP (Spatial Organisation – how not to) as its design model.
- The applicant has failed to take into account the Officer Comment submitted in the Officer Report for Phase 1 in which it is stated that "it is considered appropriate for phase 1 to have what is an urban/suburban feel where it adjoins other development but as later phases move northward to may be appropriate to spread density around in order that elements over-look the adjacent woodland and/or the planned large area of open space have a looser more organic layout with reduced densities to provide a stepped transition from urban to rural".
- The Parish Council also contends that any application coming forth should have had more of a rural feel to the development and should have had less of a regimented form of design with the use of cul-de-sacs to avoid the 'tunnel' effect. Given the location of the housing to be allocated on the site there should be more connection with the rural landscape surrounding the site and the use of soft landscaping to shape views and enclose space is sought.
- The lack of allotments within the village along with their provisioning is mentioned within the made Thurston NDP and the Parish Council cannot support an application that fails to take note of the demand for such a facility and one which has removed the space allocated in the outline stage for allotment. It should be noted that the NDP states that allotments should be provided in groups that have appropriate care, cycle and foot access and should ideally be on the periphery of housing development. Policy 5 states that the provision of allotments or community spaces will be strongly supported.
- The Parish Council acknowledges that there is a mix of house types and sizes but once again has a concern with the size of the smaller dwellings and would request that all properties are built to current

Nationally Described Space Standards as published March 2015 and endorse the comments made by the Strategic Housing Officer.

- As has been mentioned previously by the Parish Council on other significant planning applications within Thurston, it is disappointed to note that, contained within this phase, there are a number of 2 and a half storey dwellings. As has been stated previously, within the northern side of the village, there are no 2.5 storey dwellings. The Parish Council is concerned that their inclusion at different roof heights from the surrounding dwellings will provide for a street scene that is neither in keeping with the surrounding area nor enhancing of the area as a whole. Acknowledging that a number of 2.5 dwellings were approved at Phase 1 stage, the Parish Council draws reference to that fact that these were to be sited on the crescent which would read as a place in its own right and that at the Planning Referral Meeting of 24th July 2019, the Committee was in agreement that there was a need to ensure that Linden Homes, the Parish Council and the Planning Officers continued discussions for future areas coming forth in terms of there being no 2.5 dwellings and no urban layout.
- Mid Suffolk District Council, at its meeting on 25th July 2019, voted on motions to support Suffolk's county-wide aim of becoming carbon neutral by 2030. It was claimed that this would give (MSDC) the mandate we need help the Government to deliver its 25-year Environment Plan and increase the powers and resources available to local authorities to address climate change. This proposal demonstrates no measures to discourage the use of cars for residents to travel to work. The use of vehicles to access areas of employment outside of the village – as this proposal fails to offer any employment opportunities - will increase congestion and carbon emissions.
- **The Parish Council supports the submission by Suffolk County Council (of 26th October 2020) that due to the increase within the proposal of an additional 67 dwellings and the impact that such an increase will have in terms of cumulative impact on the highway network, there is a need for a Transport Assessment or Statement (as per their original submission of 2 June 2020).**
- Within the Public Open Space to the north of the site it is noted that there is to be additional planting, but it is still unclear as to the treatment of protection offered to Lady Green Woods.
- Within the plans submitted there is insufficient detail on the landscaping that will be offered or the protection of existing trees and hedgerow to soften the development. To accord with the Thurston NDP the Parish Council would have wished to have been given further details of wildlife trees and planting to be incorporated into the site with proposals that retain the rural village feel of Thurston. The landscape buffer that abuts the countryside and the Primary School should be of a native species and will need to be enhanced.
- It is noted in the Arboricultural Method Statement that Point 8.1 states that no trees are to be removed as a direct result of the proposed development. The Parish Council expects all levels of local government to ensure that statements made in documents such as these are fully endorsed.
- The Parish Council notes the comment from Place Services at Essex County Council "The Site Layout and Enclosure Plan shows trees along the boundaries of the housing parcels and the woodland. However, these are not replicated on the soft landscape proposals".
- Although it is stated that the scheme has complied with the Suffolk County Council Parking Standards (2015), there is a concern at the overall provision of parking spaces with only a number of garages being incorporated (53). Whilst the Design Statements states a desire to include cycle routes which promote active travel, given the few garage spaces, it is difficult to see how the security of cycles will be accommodated.
- **Furthermore the Parish Council supports the submission by Suffolk County Council (of 26th October 2020) that there is a need to revisit the parking proposal in that the width between houses/fences should be 3.1m (6.2m minimum for parking next to each other) to accommodate sufficient space for car parking.**
- The Parish Council is concerned that in light of the Climate Emergency declared by not only MSDC but also Suffolk County Council as the Principal Authority, it is only proposed to have electric vehicular charging points for dwellings with garages only. The Parish Council would like to see measures that enable all to contribute to tackle climate change, reduce carbon emissions and waste and make the county cleaner and greener and this limitation does not support the measures that are being taken and should be part of all planning applications submitted for consideration.

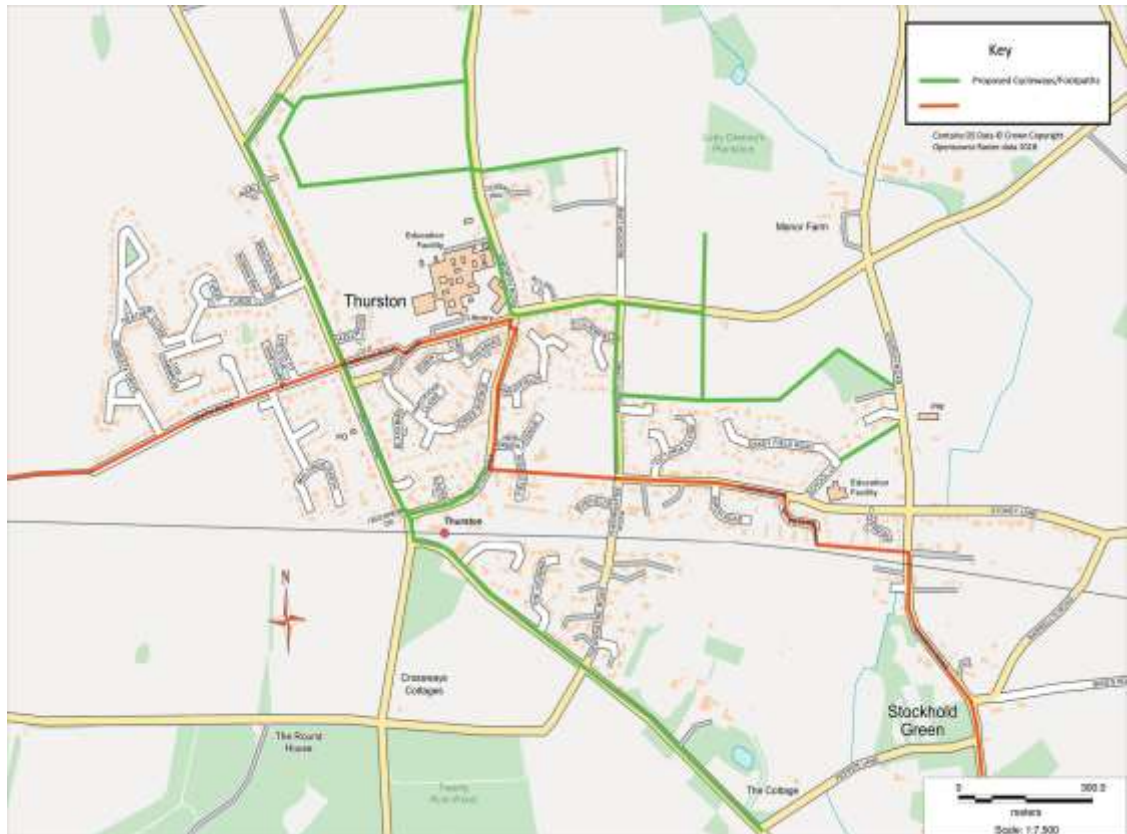
- The Parish Council is further concerned that there is insufficient regard to the requirement of an expectation that visitors will require parking facilities which will lead to congestion on the spinal road as well as private roads thereby impacting on highway safety for all users. Visitor parking spaces total 45 for the development and the Parish Council would like to see a revised layout showing adequate visitor parking suitably located and accessible for use. It also questions **the strategy for distribution of visitor car parking spaces as there are several areas where visitor spaces are provided but not necessarily required – in the main on private drives off a shared access.**
- The Parish Council is also concerned that the layout shows a significantly reduced level of parking provision for rented/shared ownership homes.
- The new dwellings, on such a tight scale are now considered to be incompatible with the wider rural open countryside character and visual appearance and would therefore have a negative adverse effect on the rural character of the area. The proposed development, on the edge of the village, will therefore appear discordant when viewed against the established grain of development which would have a significantly detrimental effect on the character of the area. Policy 9 of the Thurston NDP requires all new development to be designed to ensure that its impact on the landscape and the high-quality rural environment of Thurston is minimised.
- With regards to play provision the Parish Council is disappointed, that there is limited provision for formal play equipment to be provided at the site in accordance with the S106 Planning Obligation accompanying the outline planning permission. The Parish Council has stated during the discussion of the 1st submission for Reserved Matters for this site that it feels that given the wooded area to the north – east of the site layout there should be some form of recreational activity provided and it further expected that further details on the type of equipment coming forth would be submitted under Phase 2 and should have been include within this application provided. Whilst it acknowledges there is a proposal for a woodland play area and the natural play experiences, yet again, there is a concern that the proposal does nothing to address the paucity of play equipment / areas aimed at wider groups of the community. The Parish Council formally requests that such facilities should be a discussion point and condition of any planning permission going forward as it will be of a demonstrable recreational and amenity value. As has been stated previously the Parish Council is committed to ensure that any new play provision within the village is strategically placed to ensure it complements existing provision and meets any known deficits. In general, it has been acknowledged that there is a need for 'adventure style provision' particularly attractive to juniors and older children but this should not be at the exclusion of the toddlers up to 10-12 year old children).
- Whilst the site retains the same ingress and egress, there are concerns that any proposed increase will further increase the safety risks with the new school being effectively part of the same site. The Transport Assessment undertaken by MLM Group at Table 6.2 demonstrates that the Phase 2 proposals would generate an additional 85 two-way people trips in the AM peak and 73 two-way people trips in the PM peak compared to the extant planning approval for the site. Of these trips, there would be 43 two-way vehicle trips in both the AM and PM peak hours. However, it fails to address the concern that this is on a site upon which a Primary School is to be located – 630 places with additional 60 pre-school places. This increase in traffic movement will have a significant impact on the safety of pedestrians and cyclists accessing the educational facility from across the village.
- Thurston Parish Council notes that, to date, SCC Highways Authority have not shown positively that identified mitigation measures 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.
- The position stated above has been referenced in the letter submitted by SCC Highways (Samantha Harvey (SCC) to Vincent Pearce (MSDC) 22 May 2019) 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.
- Whilst the Parish Council acknowledges that some mitigation measures have been / are being discussed (due to further applications being considered in Thurston) in relation to
 - Highway junction improvements at Fishwick Corner.
 - Highway junction improvements at Pokeridge Corner.

- Highway junction improvements at Beyton Road / Barton Road.
- Highway junction improvements at A143/Thurston Road

(Samantha Harvey (SCC) to Vincent Pearce (MSDC) 7 January 2020), the Parish Council is concerned that additional growth such as that now being considered, is unsustainable, unsafe and will have a severe impact on the Highway Network in and around Thurston. It has overall concerns that this application has not considered the cumulative impact it will have on highway safety for all users of the highway network.

- The Parish Council would also expect to see transport assessment also taking into account the change in the Suffolk County Council School Travel and Post-16 Travel Policy, the proposed expansion of the Thurston Community College (in response to growth in its catchment area) and to provide sufficient information to allow the impact of the additional traffic from the development on the highway network as a whole.
- Given the desire to promote sustainable travel further, the proposal fails to consider the impact on passenger safety on the Thurston Level Crossing at the railway station as the proposal is likely to increase the numbers using the railway station which will negatively impact the risk to users of the railway. **The Parish Council contends that whilst there has been approval, at District level, to fund a feasibility study into mitigation measures that might be appropriate, there are still no workable proposals to be implemented that that will allow those to access the Ipswich to Cambridge platform in a manner that is deemed to be safe for all users.** The Parish Council notes that the detailed assessment of the cumulative risk to users of the railway station has been updated (2020) and seeks reassurance that the Local Planning Authority will undertake measures to ensure that the most up-to-date information on the cumulative impact on the railway station from development planned for Thurston is obtained from Network Rail and seek further comments from Network Rail on the cumulative impact this further application will have.
- The Parish Council draws reference to comments submitted by West Suffolk District Council “Assuming the present application for Land North of Norton Road is approved with a higher number of dwellings (267 dwellings), there is 1475 dwellings proposed/ under construction around Thurston, a Core Village. If site allocations LA085 and LA086 are also developed this would rise to 1610 new dwellings. The cumulative impact of such a large scale of residential development from Thurston (and to a lesser extent Elmswell and Woolpit,) will impact on infrastructure and public services in West Suffolk, especially health, highways and leisure, and is causing us concerns” and reiterates its previously identified concerns that the infrastructure of a rural village such as Thurston is unable to cope with the increase in numbers on such a short timescale.
- **The Parish Council is not in agreement with the comment from Place Services that there should be a connection onto Meadow Lane from this development (two have been created in this revised version) and feels that there is sufficient manner in which to gain access to this Quiet Lane from the footpath that borders Norton Road. This departure from the approved outline planning application is not supported by the Parish Council nor has it requested such a departure.**
- **At no time has a request come from the Parish Council to vary the route of the public footpath nor create extra further accesses onto Meadow Lane.**
- **Figure 14 of the Adopted Thurston Neighbourhood Plan (as adopted by Mid Suffolk District Council in October 2019), shows the proposed footpath routes that are supported by the Parish Council:**

Figure 14: Network of shared-use routes linking key movement routes



- The Parish Council supports the comment made by the Highways PROW Planning requesting that the Applicant accommodates FP7 within their plans in the public open space area only. It is further stated that the Applicant must also ensure that FP7 remains unobstructed at both ends where it crosses the site boundary, and that it is not obstructed by planting along its length.
- The Parish Council further notes the comment within the submission from the PROW team of 26th May 2020 *“The granting of planning permission IS SEPARATE to any consents that may be required in relation to PROW. It DOES NOT give authorisation for structures such as gates to be erected on a PROW, or the temporary or permanent closure or diversion of a PROW. Nothing may be done to close, alter the alignment, width, surface or condition of a PROW, or to create a structure such as a gate upon a PROW, without the due legal process being followed, and permission being granted from the Rights of Way & Access Team as appropriate. Permission may or may not be granted depending on all the circumstances,”* and requires clarification as to why there are now two entrances from the site onto Meadow Lane.

The Parish Council is further disappointed that the request by the Mid Suffolk Planning Referrals Committee of 24th July 2019 for Linden Homes, the Parish Council and Planning Officers at Mid Suffolk to continue discussions for future areas coming forth in terms of no 2.5 dwellings; no urban layout and provision of play equipment in accordance with the requirements of the Parish Council and the overall maintenance of the very small grassed areas has not come to fruition. The Parish Council does however note from the Planning Statement as submitted by the agent that the applicant has met with Mid Suffolk District Council Planning Officers and Housing Officer to discuss the proposals and received a positive response from Officers to the proposed increased amount of housing at the site. Members of the project team have also engaged with Suffolk County Council Highways regarding the proposals and the scope for the accompanying Transport Assessment. The Parish Council confirms that it was not made aware of any of these meetings and in response to the agents comment that “The applicant met with Thurston Parish Council to share the proposals” this, as previously mentioned, was only once the plans had already been drawn up and **that all engagement has taken place with District and County Officers and not the Parish Council.**

Furthermore the Parish Council notes the comments made by the Senior Planning and Infrastructure Officer Planning Section, Strategic Development (8th October 2020) that this application relates to a new proposal and seeks consent for a total of 180 dwellings on part of the redline boundary which originally secured outline for up to 200 dwellings secured through outline application 2797/16. When taking into consideration the 87 dwellings approved under Phase 1 (DC/19/001602), this application therefore seeks

to increase the capacity of the development by 67 dwellings over the original 200 dwellings and agrees with the comment that it is essential that this application does not jeopardise the access and services for the new primary school which adjoins this site.

The Parish Council also suggests that, in light of the comments made by the Senior Planning and Infrastructure Officer Planning Section, Strategic Development at Suffolk County Council made under application DC20/01249, if more than 200 dwellings are being brought forward a review of essential infrastructure that underpins growth in the village such as education and highways must now be carried out and an additional deed entered into to secure further s106 contributions and draws the Planning Officer's attention to the planning obligation dated 20 March 2018 made between Mid Suffolk District Council, Suffolk County Council and Peter Andrew Hay.

In summary, it is the Parish Council's submission that this application has not met with a positive response and should be rejected as it is contrary to the Thurston Neighbourhood Plan in that it exceeds the approved number of dwellings (200) permitted in the outline application and as incorporated within the made Thurston NDP.

Yours sincerely,

Victoria S Waples

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