

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

27th January 2020

Dear Mr. Isbell,

Re: DC/19/03486 - Proposal: Outline Planning Application (some matters reserved - access to be considered) - Erection of up to 210 dwellings, means of access, open space and associated infrastructure, including junction) improvements (with all proposed development located within Mid Suffolk District, with the exception of proposed improvements to Fishwick Corner being within West Suffolk).

Location: Land South West Of, Beyton Road, Thurston, Suffolk.

Case Officer: Vincent Pearce

Dear Mr Isbell,

The Parish Council is writing further to request that the following matters, relating to the documents being presented to the Referrals Committee, be brought to the attention of the case officer and be added to the pack of papers being presented to members of the committee determining the applications on Wednesday 29th January 2020.

Thurston Parish Council continues to object to this application on grounds with specific matters detailed below:

Thurston's Neighbourhood Development Plan (NDP)

Thurston NDP 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.

However, given that the adopted Local Plan Core Strategy and Core Strategy Focused Review has policies which are deemed to be 'out-of-date' and inconsistent with the National Planning Policy Framework (2019), the balance in favour of granting planning permission as identified by paragraph 11 of the NPPF must tip the balance the other way as the adverse impacts of doing so will significantly and demonstrably outweigh the benefits, when assessed against the most relevant adopted plan.

The Thurston Neighbourhood Plan prevails the publication of the Joint Local Plan Consultation Document which has just completed Regulation 18 phase. Whilst the site has been included as a proposed site allocation within the Joint Local Plan, limited weight should be given to proposals for its development until all objections to this policy have been fully determined.

The Parish Council draws reference to paragraph 14 of the NPPF which requires applications to be refused where it can be demonstrated that the adverse impact of allowing development that conflicts with the

neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, and maintains that the conditions prescribed under 14 apply in the determination of these applications:

- a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made;
- b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;
- c) the local planning authority has at least a three-year supply of deliverable housing sites (against its five-year housing supply requirement, including the appropriate buffer as set out in paragraph 73); and
- d) the local planning authority's housing delivery was at least 45% of that required over the previous three years.

MSDC has, within its Mid Suffolk District Council Housing Land Supply Position Statement 2019/20 – 2023/24 (September 2019) confirmed (Paragraph 10.4 and 10.5) that, as required by the Framework (Paragraph 73 and Glossary in Annex 2) and in accordance with the guidance set out in the Framework and accompanying Guidance, demonstrated that it has a 5.66 years housing land supply.

- Highway Improvements – Mount Road - the Parish Council maintains that the package of improvements are limited in scope with physical evidence being confined to the doming of the roundabout at the Fox and Hounds junction on Barton Road. The main reason as to why the previous proposals for Mount Road are now redundant is that Suffolk County Council did not have ownership of the land to achieve the proposals now being offered by the applicant. This has little benefit apart from the claim that this will allow cars out onto Mount Road at a quicker rate. As such, given that this is the only justification for ruling out the previously agreed deliverable proposals (from the Thurston Five), the Parish Council holds that the premise of roads driving this development is the Officer's reason for approval.

The impact of allowing roads to drive development has a range of demonstrably harmful environmental impacts as it fails to halt carbon emissions that are fuelling global heating.

- Climate impact – Mid Suffolk District Council, at its meeting on 25th July, 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 questions the desire to respond positively to the climate change challenge as this proposal fails to encourage residents out of their cars.

- Barrow Foot Crossing at Thurston Railway Station – in November 2017, in response to the cumulative impact from the "Thurston Five", Mid Suffolk was tasked with finding a solution to the Barrow Foot Crossing which Network Rail had stated that it would recommend closure unless mitigation and measures were introduced to counter additional usage. To date no solution has been found apart from the requirement for new residents to be issued with advice on how to cross the foot crossing. On similar crossings with identical safety measures, businessmen have been seen crossing the lines even with alarms and horns sounding.

Network Rail has a standard Risk Assessment tool called ALCRM (All Level Crossing Risk Model) which determined the predictive level of risk at a level crossing. In 2015, the ALCRM for the crossing in Thurston was D4, in 2017 200 pedestrians were predicted to take the level to a risk factor of D3.

In a recent census carried out by Network Rail (October 2019) of the numbers using the Barrow Foot Crossing, the numbers using the crossing actually placed it into the High Risk Category on 2 out of the 9 days where data was recorded and almost touched 200 on a 3 further days.

A response submitted on 30th August 2019 to the MSDC Planning Team for Application DC/19/03486 by Mr Donaghue stated that this proposal will have a "negative impact on Thurston Level Crossing" and that Network Rail believe that as this proposal is contributing to the risk, the applicant should contribute to the new access.

The Case Officer for the above application in his Officer Report to the Committee report states that Network Rail is actively engaging with the Council and the Applicants to explore potential solutions to enhancing rail user safety at the station and that it is expected that Network Rail will support the proposed improvements

under the rail bridge and that it is currently being explored as to whether a ramp/lift can be installed on the south side of the station as a future access enhancement using contributions from CIL funding.

The Parish Council is obviously concerned that this application is coming before a committee for determination with no concrete proposals on the table to support any measures to enhance rail user safety at the station despite Network Rail's own Town Planning Technician having stated that this proposal will have a negative impact and the Case Officer for the application merely recommending a contribution from the applicant themselves to contribute a sum of money towards commissioning a feasibility/design study to achieve a non-costed and (to date) non identifiable solution.

The Parish Council questions whether the money being offered by the applicant - £30,000 - is sufficient to fund a feasibility / design study and why Mid Suffolk Planners have not sought to ensure that a fully costed and achievable solution is in place prior to the approval of not only this application but also the one for land to the east of Ixworth Road.

In a response as to whether Network Rail was aware that a further planning application for 210 houses to the north of Thurston has also been submitted (as there is no response on file for application DC/19/02090, the Route Level Crossing Manager for Network Rail Anglia confirmed that he would speak with his planning department to check if we (Network Rail) have objected to any forthcoming applications, as they would cause Network Rail concerns.

The Parish Council contends that the District Council should be aware that infrastructure, such as rail, needs to be addressed in Thurston prior to the approval of further planning applications and requires collaborative working with infrastructure providers to ensure fully costed solutions are capable of being delivered.

- Thedwastre Bridge – in Section 4 of the response from SCC Highways Department (letter dated 7th January 2020) it is stated that the proposed mitigation is that further improvements can be made for pedestrians and yet it also describes the bridge as having significant limitations.

The Parish Council maintains that there is very limited scope to improve the safety of pedestrians and cyclists without further narrowing the bridge for vehicles and that as there is no formal footway over the rail bridge, pedestrians and cyclists will be sharing the road with vehicles within a single land priority system.

There are concerns that approval is to be granted on the assumption that further options could be explored.

As the bridge will become a major route for those accessing the village's facilities, services and schools the impact on vulnerable users has been ignored and the applications have failed to demonstrate that their proposal will not have an unacceptable impact on highway safety and the safety of all road users especially the most vulnerable.

- Pokeridge Corner – the Parish Council challenges the assumption that visibility is the major cause of delay. This might hold true for accidents at this junction, but it is felt that the major factor for delay is the amount of traffic along with traffic flows. Analysis of this junction with the committed and proposed developments shows that it will operate above the desirable capacity limits.

It is challenged as to whether the proposed mitigation measures of installing an uncontrolled crossing with improved visibility to one corner of the junction will reduce vehicle speeds or render the junction safer.

The assumption that the Beyton Road development will have minimal impact in terms of capacity on this junction is also challenged. By a further increase in numbers (of some or more) accessing this junction from the Beyton Road development will ensure that the situation will become severe.

- A143 / Bunbury Arms Junction – the Parish Council challenges the assumption made by Suffolk County Council (SCC) Highways Department that it is likely that, due to its location south of the railway line, the impact from this development on this junction will be minimal.

It should be noted in the response submitted by the Highways Department that after traffic flows have been generated from the committed sites (2017); growth patterns and new trips from the proposed developments, this junction, with the proposed mitigation scheme, is still predicted to be over capacity.

The Parish Council believes that the comment from SCC Highways Department which states that there is only a possibility of scope to improve the proposed preliminary design of the signals using better software and monitoring systems to improve capacity, demonstrates sufficiently that this development will result in a

severe impact in terms of highway capacity. Additionally, SCC Highways Department states that there is no further mitigation, in terms of highway layout, considered possible within the highway boundary.

The impact of this development as well as the one to the East of Ixworth Road will be to create a knock-on effect in Thurston for traffic being held up at this junction. Locally there is evidence that traffic is attempting to avoid this junction by accessing Thurston from Ixworth along Ixworth and Norton Road.

- Barton Road Mini Roundabout and Rail Bridge/Beyton Road Junction Rail Bridge – the Parish Council contends that the realignment of the carriageway under the railway bridge to increase the footway width to 1.5 metres whilst maintaining access under the bridge for larger vehicles is not a suitable solution to ensure safety of pedestrians as the footway is of insufficient size to render it safe for all users,. This is of particular relevant to vulnerable users given that it is situated next to a very busy road. The Parish Council questions why the width of the footway at 1.5metres has been deemed acceptable when other developments are required to install shared-use paths which supports walking, bicycling and people in wheelchairs.

It should also be noted that whilst the proposals are to provide a number of crossings points along Beyton Road to link to the existing footway little account has been taken of the current widths of the existing footpaths and their suitability for increased pedestrian movements from this site – for example the footpath at Royston Drive has a maximum width of 1.17 metres whilst the footpath along Thedwastre Road reduces from 1.12 metres down to 1.00 metres, both of which are below current guidelines.

The Parish Council is furthermore concerned that the Officer Report on the proposals being offered, dismisses Policy 6 of the Thurston NDP by stating that that the situation for cyclists using this route remains unchanged from the existing situation and fails to consider that this route will be one of the prime routes for those accessing both the Primary School and College using sustainable means.

The Parish Council would also like to state that the drawing produced by Cannon Consulting Engineers in their reports and as replicated by SCC Highways Department in its response of 7th January 2020 (Drawing Ref X601_PL-214) is very misleading as it implies the realignment of the road will allow for a coach, bus and parent and child to traverse through the bridge at the same time. A typical coach used by the College is much higher than that shown in the diagram and an unrepresentatively small bus gives the impression that a bus and car can pass under the bridge simultaneously. The reality is that this is a one-way passage when a bus, lorry or agricultural vehicle pass and that such vehicles move to the centre of the road to pass under the bridge. The Parish Council is concerned at the interpretation that this might give, and the impartiality of the data provided to MSDC.

- Precedent - as has been stated previously this application is outside of the settlement boundary of the Thurston adopted NDP and as such in conflict with the Thurston NDP. The precedent for refusal as contrary to Thurston's adopted NDP has been established with refusal of planning applications DC/19/05513 and DC/19/05465.

To summarise, given the evidence identified above, the Parish Council contends that the minor benefits of the proposal does not outweigh the significant adverse economic, social and environments impacts that will be had and that insufficient measures have been identified to reduce or eliminate these impacts and that this application should be refused.

Yours faithfully,

Victoria S Waples

V S Waples, BA (Hons), CiLCA

Copies to:

Members of the Mid Suffolk Planning Referrals Committee:

Councillors Terence Carter; James Caston; Rachel Eburne; John Field; Peter Gould; Kathie Guthrie; Lavinia Hadingham; Matthew Hicks; Barry Humphreys, MBE; Sarah Mansel; John Matthissen; Richard Meyer; Dave Muller; Mike Norris; Wendy Turner; Rowland Warboys

County Councillor Penny Otton

District Councillors Harry Richardson and Wendy Turner