

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

4th September 2019

Dear Mr. Isbell,

**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

The Parish Council, having considered this application at an extraordinary Parish Council Meeting on 28th August 2019, would like to confirm that it objects to this application in its entirety with particular concerns raised as below.

Whilst it acknowledges that the applicant has actively engaged with the Parish Council on a number of concerns raised at pre-application and post submission stage, and should be commended on its ecological report which was detailed and thorough, overall it was felt that the proposal failed to take full regard of the policies contained within the Thurston Neighbourhood Development Plan (NDP) which, having passed examination stage, is due to be put to a referendum vote on 12th September 2019. The Examiner concluded that, subject to amendments as highlighted by the examiner, and which do not significantly or substantially alter the intention or nature of the Draft Plan, the NDP as submitted meets the Basic Conditions and should proceed to Referendum. It was felt by the examiner that the Thurston NDP will provide a strong practical framework against which decisions on development can be made and as such the Parish Council contends that it is to be regarded as a material consideration in the determination of this application.

1. As has been mentioned by the Parish Council on similar applications for new dwellings outside of the settlement boundary, since 1st November 2017 it has been asked to consider a number of planning applications for new dwellings outside of the Settlement Boundary of Thurston. This application on land to the south west of Beyton Road is outside of the amended built-up area boundary and as such is contrary to not only policies within the Mid Suffolk Local Plan but also the post examination Thurston Neighbourhood Development Plan POLICY 1: THURSTON SPATIAL STRATEGY which 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.
2. As the proposed development is outside of the current defined settlement boundary allocated by Mid Suffolk District Council for Thurston, it is also contrary to the spatial strategy in Policy CS1 of the Core Strategy. Being in conflict with Policy CS1 would also bring it in conflict with Policies FC1 and FC1.1 of the Core Strategy Focused Review (Adopted December 2012). The conflict with the development plan would therefore be an adverse impact of the proposed development.
3. The general approach in the Thurston Neighbourhood Plan, fully supported by the Parish Council is that growth will be focused on the 5 significant sites which were granted planning permission as of 2017 (which are located within the settlement boundary as amended by the Neighbourhood Plan) and on small scale infill

sites within the settlement boundary. As these sites are expected to provide high quality schemes which generally enhance the public realm and improve accessibility for pedestrians and cyclists, it is felt that this proposal will neither enhance nor protect the village facilities given its location outside of the settlement boundary.

4. The granting of planning permission on 5 sites in late 2017 has meant that there are over 1,000 dwellings in the planning pipeline for Thurston, i.e. with planning permission but not yet built or occupied. Given the levels of growth in the planning pipeline; the previously raised fundamental concerns of the Suffolk County Council Highways 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 revised.
5. Thurston Spatial Strategy provides 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. The proposal submitted by the applicant has failed to offer any such proposals but has merely sought to reflect the mix already being offered by the five significant planning applications granted approval in 2017 for 818 dwellings.
6. Whilst the Parish Council acknowledges that the proposal compromises market and affordable housing and in part conforms to the Thurston NDP Policy 2: Meeting Thurston's Housing Needs, it fails to take into account that the parish of Thurston already has over 1,000 approved dwellings in the pipeline with 35% of these being affordable and a number being provided as shared ownership which will be of particular benefit to younger people wishing to access the housing market. The Parish Council therefore contends that this proposal offers nothing further to the parish in terms of provision.
7. Acknowledging that the proposal may well include bungalows (with the precise number and nature of these being determined under a reserve matters application), the Parish Council is concerned at the lack of detail on the number to be included within the proposal and would comment that in order to be in conformity with Policy 2 Part E more than 12 bungalows (as indicated at the meeting with representatives from Bloor Homes on 23rd August 2019) should be included within any such proposal.
8. The applicant has also failed to respond to the consultative findings of the Thurston NDP which reflected residents desire and support for houses in groups of no more than 50 dwellings and there is a general concern over the indicative house types, in particular the size of the smaller dwellings, and would request that all future applications for housing in not only Thurston, but also Mid Suffolk, have a requirement that all properties are to be built to current Nationally Described Space Standards as published March 2015.
9. As has been mentioned by the Parish Council on previous occasions, 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. 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.
10. Thurston Parish Council objects to this application on the grounds that, to date, 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 (Pokeriage 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."

11. The position stated above has been referenced in the letter submitted by SCC Highways (Samantha Harvey (SCC) to Vincent Pearce (MSDC) 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.
12. Whilst the Parish Council acknowledges that the applicant has provided details of proposed infrastructure to be secured through planning obligations as part of the proposed development:
- 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; together with alteration to the Station Road / Barton Road roundabout to account for this realignment.
 - Traffic calming on Beyton Road.
 - Reduced speed limit of 30mph on Mount Road East to Fishwick Corner
- it has overall concerns at the impact these proposals will have on highway safety for all users of the highway network.
13. The Parish Council would request that consultation be had with Suffolk County Highways on the solution being proposed by the applicant for highway junction improvements at Fishwick Corner which involve the utilisation of land outside of highways land to deliver an improvement in the form of the realignment of New Road/Barton Road to create a staggered junction. It is concerned that this staggered junction will result in any vehicles leaving the village to access the A14 for BSE/Cambridge at the slip road by Rougham Hall Nurseries having to turn left and then wait in the middle of Mount Road to turn right. he proposed. On-coming traffic will therefore be approaching from around a blind bend where accidents regularly occur (statistics are available). With the addition of the proposed southern access to the Bloor site onto Mount Road, the Parish Council is concerned at the overall impact this will have on highway safety at one of the most dangerous junctions in the village. There is a further concern that the proposal being offered will effectively release the adjacent field to the West of New Road/Barton Road for further development.
14. Whilst the reduction of the speed limit of 30mph on Mount Road East to Fishwick Corner is to be supported, given that the proposal has a southern access point along this route the comments made under 13 above are of equal importance.
15. In addition, 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) will impact on the Thurston Community College which has a wide 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 has been given weight by the applicant and the Parish Council would request that the applicant be required to fully address the cumulative impact of this development on Highway Safety.
16. The applicant has also failed to take into account and sought to mitigate the cumulative impact its development will have on the areas mentioned in 10 and 12 and has relied on the findings of the AECOM report produced in 2017. The Parish Council would expect to see further transport assessment on all of the junctions named above 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.
17. Of equal concern is also the failure by the applicant to consider the main access route for those from the south of the village to the current and future location of the Thurston Primary Academy. This access route is via the priority system on Thedwastre Road over the railway bridge which has no footpath for pedestrians. The increase of vulnerable persons - pedestrians and cyclists - along this route has not been considered by the applicant and the Parish Council is concerned that no measures have been proposed that will provide mitigation measures that will ensure that the highway safety for all users, not least the most vulnerable, is not severely impacted.
18. Thurston NDP Policy 6 expects that all new developments must ensure safe pedestrian and cycle access to link up with existing pavements and cycle infrastructure that directly connect with the Key Movement Routes as identified on the Policies Maps on pages 75-76 of the Thurston NDP. Such routes should also ensure that access by disabled users and users of mobility scooters is secured. The Parish Council considers that the proposal to widen the footway under the railway bridge by realigning the carriageway, together with an

alteration to the Station Road/Barton Road roundabout to account for this realignment with a further mini roundabout to the south of the railway bridge will severely compromise the safety of cyclists using the route to gain access to the facilities of the village and overall will fail to alleviate capacity improvements. Thurston is a rural village and traffic assessments most suited for towns instead of villages gives optimistic trip movements and therefore fail to realistically reflect the true movement of traffic in a rural village.

19. Whilst the Parish Council acknowledges that the proposal has traffic calming measures on Beyton Road by installing a raised table to slow traffic, the Parish Council, as has been stated on previous applications, maintains that such tables provide confusion for all users of the Highway and in particular those most vulnerable users. Furthermore the installation of an uncontrolled (ie without traffic lights) pedestrian crossing in the vicinity of Pokeridge Corner will impact on vulnerable and disabled users and will fail to provide safety for vehicles, pedestrians and cyclists alike. The Parish Council would request that further assessment on the cumulative capacity of this junction from approved and pending applications (taking into consideration comments above) is carried out to ensure that capacity levels are not exceeded, and the impact is not now considered to be severe.
20. 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 draws reference on the email submitted on 30th August 2019 from Nick Donoghue of Network Rail which has stated that the proposal for 210 new dwellings is likely to increase the amount of level crossing users increasing the risk to the operational railway. The Parish Council contends that no proposals have been provided that will allow those to the south of the railway line to access the railway station 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 not been updated since 2017 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.
21. The application also fails to demonstrate that it has taken into account 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 211 places are required. This proposal will give rise to a potential further 53 pupils which is not taken into account in the determination of the size of school being built. 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 are no detailed plans of what the accommodation would comprise, and plans are underway to build a school with a capacity of 420 only.
22. As Mid Suffolk District Council has recently provided evidence that it has a five-year supply of deliverable housing land available, which includes a 20% buffer, the Parish Council contends that the benefits of the development, taken cumulatively, do not outweigh the harm that has been identified above.

The Parish Council would like to state it considers that this application and the one recently submitted by Gladman Developments Ltd 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 these should be planned properly through further engagement with the neighbourhood plan and the local development plan in order to ensure that they do not result in unsustainable growth of the village 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.

In summary, the Parish Council contends that this application should not be supported as it fails to adhere to the main policies in the Thurston NDP. The Parish Council requests that the desires of the community, which were clearly expressed through engagement in the production of the Thurston NDP, are respected and that sites coming forward should demonstrate that they are in conformity with the Thurston NDP.

Yours sincerely,

Victoria S Waples

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