

# THURSTON NEIGHBOURHOOD PLAN 2018 - 2036

## Reg 14 Pre-Submission Draft – Suffolk County Council

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

Page / Policy Number	Comment	Comments by NP	Action to be taken
Archaeology	<p>As part of the historic background information present in the plan it would be beneficial to include reference to the archaeological context within the parish.</p> <p>“The County Historic Environment Record captures information relating to the earlier history of the parish, with approximately 40 entries relating to all periods of human history. A watercourse runs northwards through the parish into Pakenham Fen, and its valley sides are topographically favourable for early activity, with a Bronze Age burial recorded in Skeleton Plantation. Part of the Nether Hall estate lies in the north of the parish, and the early hall site is not known. In the west of the parish, a Roman road runs on a north-north-east to south-south-west alignment across the former Thurston Heath, and there are Roman finds recorded in the vicinity, as well as Iron Age and Neolithic occupation and activity”.</p> <p>In order to provide clarity to development on any future sites SCC would recommend a note relating to archaeology in development within the plan, as the sites in the plan all have planning permission and there is not a</p>	<p>Bring in under Local Context – 1<sup>st</sup> paragraph i.e. as 2.1 – use wording from SCC within “ ”</p> <p>Agree – bring in as a general reference 2.2 – “Archaeology: Suffolk County Council manages the Historic Environment Record for the county, which includes approximately 40 entries for Thurston. Non-designated</p>	

	<p>separate policy relating to heritage assets. Recommended wording for the note is below.</p> <p>“Suffolk County Council manages the Historic Environment Record for the county, which includes approximately 40 entries for Thurston. Non-designated archaeological heritage assets would be managed through the National Planning Policy Framework. Suffolk County Council Archaeological Service advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the NPPF and Local Plan policies are met. Suffolk County Council Archaeological Service can advise on the level of assessment and appropriate stages to be undertaken.”</p>	<p>archaeological heritage assets would be managed through the National Planning Policy Framework. Suffolk County Council Archaeological Service advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of the area at an appropriate stage in the design of new developments, in order that the requirements of the NPPF and Local Plan policies are met.”</p>	
<p>Education</p>	<p>The education requirements of development in the parish have been addressed as part of determining the planning applications of the sites in the plan. However, the Neighbourhood Plan can still benefit education through policies and other proposals. As a majority of the sites are outline applications, the Neighbourhood Plan could create policy requirements that have an effect on the reserved matters applications, which set detailed requirements for the permitted sites.</p> <p>A positive input the Neighbourhood Plan could have in relation to the location of the new primary school site, is to set out the community’s preferred way of integrating pedestrian and cycle access to the school into the Key Movement Routes in figures 9.1 and 9.2, and the proposed routes in figures 7.3.</p>	<p>At the moment there is no definite confirmed site. Whilst there is a preference, the option has not yet been triggered.</p> <p>Were the site on land to the north of Norton Road to be chosen the NP has demonstrated under Figure 7.3 as to how such proposed routes could link to the additional facilities.</p> <p>Add in sentence at 7.9 : “A new school will be provided in Thurston at a new location in the village. This will become a key destination for movement and links should be provided to the surrounding network,</p>	

		allowing safe, direct routes for pedestrians and cyclists”	
Flooding and Water Management	<p>It would be helpful if the plan could describe the flood risk in the parish and signpost to the relevant national and local policy.</p> <p>Regarding flooding from rivers (fluvial flooding), the majority of the parish is in flood zone 1, the lowest level of flood risk. There are areas of flood zone 2 and flood zone 3 (the highest level of flood risk) associated with a water course to the east of the village. There are areas of surface water (pluvial) flood risk within the village, mainly along the length of Barton road and some of the surrounding streets.</p> <p>The relevant national policy is NPPF paragraph 157 and 158. The relevant local policy is Mid Suffolk Core Strategy Policy CS 4 and the Suffolk Flood Risk Management Strategy (SFRMS) (<a href="http://www.greensuffolk.org/about/SFRMP/">http://www.greensuffolk.org/about/SFRMP/</a>). The SFRMS also contains guidance on how SuDS measure should be designed, and it would be beneficial for the Neighbourhood Plan to refer to this.</p>	<p>Agree – add this into Local context section at 2.3 – new sentence to read</p> <p>2.3 “The majority of the parish is in flood zone 1, the lowest level of flood risk. There are areas of flood zone 2 and flood zone 3 (the highest level of flood risk) associated with a water course to the east of the village. There are areas of surface water (pluvial) flood risk within the village, mainly along the length of Barton road and some of the surrounding streets.”</p> <p>Agree – add this into Growth in the planning pipeline at 2.38 – new sentence to read</p> <p>2.38 “National and local planning policy directs development in respect of flooding issues as does the Suffolk Flood Risk Management Strategy (SFRMS) (<a href="http://www.greensuffolk.org/about/SFRMP/">http://www.greensuffolk.org/about/SFRMP/</a>). The SFRMS also contains guidance on how SuDS measure should be designed.”</p>	
Libraries	The aspiration in paragraph 6.6 of the plan to include the library as part of a community hub is noted. At present SCC has no plans or funding to move the library from its current location but would be willing to discuss proposals if the Parish were to develop a project and identify funding to enable the library to relocate.	This is currently being actively being discussed with a number of stakeholders including SCC.	<b>A number of stakeholders are engaged with this discussion</b>
Minerals and Waste	SCC is the minerals and waste planning authority for Suffolk. The key policy documents regarding minerals and waste in Suffolk are the Minerals Core Strategy and the Waste Core Strategy, and the emerging Suffolk Minerals and Waste Local Plan (SMWLP). The SMWLP is currently at the submission version stage and it is expected that it	Noted timescales	

	<p>will be submitted to the planning inspectorate in September 2018, go through examination in public in early 2019, and be adopted in mid-2019.</p> <p><b>Minerals</b> The Minerals Core Strategy and SMWLP contain policies that safeguard existing minerals extraction and sand and gravel resources throughout the county. There are no current or proposed areas of mineral extraction. There are potentially exploitable areas of minerals to the north east of the parish, however this is at least 200 meters from the closest housing site, which already has planning permission. As such there are no minerals safeguarding issues raised by Neighbourhood Plan.</p> <p><b>Waste</b> The Waste Core Strategy and the SMWLP contain policies that safeguard existing and proposed waste facilities. There is one safeguarded waste facility within the parish, which is a waste water treatment facility. However, the plan does not present any proposals that would cause a safeguarding issue in this case. The nearest of the permitted developments (site B) is approximately 500m away from this facility.</p>	<p>Noted</p> <p>Noted</p>	
<p>Policy 9 Landscape</p>	<p>Policy 9 provides robust requirements for how development should approach impacts on the landscape. SCC suggests a minor amendment to paragraph C of the policy:</p> <p>“Development must ensure that valued features of the local landscape, including hedgerows, are protected where possible. New development must preserve these features and they should only be lost, subject to the provision of compensatory planting, where it is fundamentally necessary for the delivery of the development, e.g. to provide access to the site.”</p>	<p>Agree – wording as suggested to be used</p>	
<p>Policy 11 Biodiversity &amp;</p>	<p>SCC is supportive of policy 11, to include provisions for wildlife in development, however the policy could provide additional benefit to wildlife by requiring new developments, and their included biodiversity features, to</p>		

Ecology	<p>connect to wider ecological networks. Paragraph 8.4 of the Plan correctly highlights that hedgerows are “connecting links” and this principle could be incorporated in development.</p> <p>SCC would recommend that a paragraph C is added to policy 11, stating that planting, landscaping and incorporated wildlife features should connect to wider ecological networks. Better connected ecological networks increases ecosystem resilience. Suggested wording for a new paragraph C in the policy is below:</p> <p>“Planting, landscaping and features which encourage wildlife in new development should connect wider ecological networks.”</p>	Agree – wording as suggested by SCC to be used	
Rights of Way	Figure 2.5 - this shows a number of Public Rights of Way (PRoW) in and around the village of Thurston, however it would be beneficial to show a map of the wider PRoW network throughout the whole plan area, as this would show paths that enable access to the countryside and from Thurston to the small settlements in the parish.	<p>Agree – <u>SCC to be asked to provide a base map showing the public rights of way for the parish</u></p> <p>Amendment made to 7.11 to bring in PROW</p>	
Movement Routes	<p>In paragraph 7.16 the word “footpaths” is used however it is unclear if this means footpaths as defined in footnote 8 on page 46. It is recommended a different wording is used if this is not the case.</p> <p>In paragraph 7.19 it is recommended that the following amendment is inserted, to recognise the role of the PRoW network as walking and cycling facilities:</p> <p>“Linking the new housing developments, as well as the existing parts of the village, into the network of walkways and the Public Rights of Way network is vital to encourage more walking and less use of the car.</p>	<p>Remove 7.16 as an incorrect statement and cannot be corroborated.</p> <p>Agree that walkways are not well signposted – but sentence lacks clarity and accuracy.</p> <p>Agree with proposal - Insert as 17.9.5</p>	
	<p>Paragraph 7.19.3 could include cycling as well as walking as means of sustainable transport.</p> <p>It is also recommended that there is policy protection of</p>	Agree with comments, the NP and PC would want to ensure that there is policy protection of the PRoW network – insert as suggested	

	<p>the PRoW network throughout the parish, as paragraph 98 of the NPPF states “Planning policies and decisions should protect and enhance public rights of way and access”. The plan could achieve this by amending policy 6 to add a part C. Some suggested wording is below.</p> <p>“The Public Rights of Way network should be protected. Where appropriate development should enhance the Public Rights of Way network by improving routes or creating new links. Linking the Public Rights of Way network to the Key Movement Routes is encouraged.”</p>		
Figure 7.3	<p>On this map it is unclear in this figure what is being proposed as footpaths and what is being proposed as cycle paths, due to the definition of footpaths set out in footnote 8 on page 46, which excludes bicycles. It is suggested that this map is modified to specify, which of the proposed routes are footpaths, which are cycle routes, and which are a different designation combining the two</p>	<p>Rename to Shared Used Routes</p> <p><i>Note under cycling proposals wording change to reflect Government Guidance – Shared Use Routes (2012)</i></p>	
Paragraph 8.9	<p>A minor amendment is suggested to this paragraph to fully define the highlighted footpath.</p> <p>“...along the public footpath to the north linking School Lane and Church Road”</p>	<p>Agree with the suggestion</p>	
Social Care	<p>Whilst the support, in Policy 3, for residential care (class C2) is welcomed, the County Council’s recommendation would be to widen this policy to other types of specialist housing. Specifically, this could mean ‘Extra Care’ housing, which is often classed as being within use class C3. The policy could be redrafted as follows:</p> <p>“In order to address the care needs of <del>elder people</del> in Thurston, the provision of specialist <del>care</del> housing facilities (Class C2) is encouraged. This could include <del>includes</del> the provision of a residential care home (Class C2), an Extra Care Housing development or other provision to meet local needs”.</p>	<p>Agree as this has also been flagged up by MSDC.</p> <p>Amend words as proposed:</p> <p>“In order to address the care needs of Thurston, the provision of specialist care housing facilities (Class C2) is encouraged. This could include the provision of a residential care home (Class C2), an Extra Care Housing development or other provision to meet local needs”.</p>	
Transport	<p>It is also correct to note that any further increases in highway capacity are not considered to be practical within</p>		

	<p>the constraints of the highway boundary for the following locations;  2.36.1: The A143/Thurston Road (Bunbury Arms) Junction  2.36.2: C692 / C693 Thurston Road (Fishwick Corner)  2.36.4: C692 / C693 Thurston Road under rail bridge</p> <p>All the above have peak traffic flows at or exceeding the theoretical capacity of the junction or link. Further capacity and safety improvements may be possible at both the Bunbury Arm and Fishwick Corner junctions if additional land can be provided.</p> <p>This identifies a significant constraint on further, additional growth, and limited options for further mitigation. However, it is not appropriate for the plan to state that additional development would have 'severe' impacts. Future proposals would have to be assessed on their own merits, based on the evidence at that time.</p> <p>In respect of paragraph 2.36.3, the C560 Beyton Road/C692 Thurston Road/U4920 Thedwastre Road (Pokeriage Corner) junction has flows below but approaching the theoretical capacity of the junction and any future developments which affect this junction will need to demonstrate that the impacts are not severe in planning terms.</p>	<p>Agree add words to 2.40.1 &amp; 2.40.2 &amp; 2.40.4 "Further capacity and safety improvements may only be possible if additional land can be provided".</p> <p>Remove the word "severe" when discussing additional development.</p> <p>The NP to ensure that the wording used is relevant to and reflects that of S Merry's Letter (SCC) dated 13.10.2017</p> <p>Noted and word 'severe' kept in the sentence.</p>	
Transport & Movement	Paragraph 2.45 (new 2.49) – Barrow Crossing – SCC would support any practical access, but any improvements must not be significantly detrimental to the highway network in terms of safety and capacity.	Noted – sentence to be amended to reflect this concern.	
Housing and Design	<p>SCC – concur with the references in 5.3 to the significant constraints on the highway network.</p> <p>Suggest that wording be changed to ensure the NP does not prohibit growth but ensures that constraints are</p>	<p>Agree – wording to be changed to read:</p> <p>"The SCC Highways Team has specifically identified locations where, unless further mitigations can be found, additional development should not proceed without</p>	

	addressed.	detailed transport assessments, surveys and modelling that demonstrate the impacts of additional major development are not severe in terms of safety or capacity and that suitable sufficient mitigation can be provided.”	
Residential Design	<p>SCC – Project is underway to update design guidance in Suffolk</p> <p>Suggested addition at 5.26.10 with reference to the design of streets and safety issues.</p> <p>Suggested amendment to 5.26.11 to ensure security is balanced with the need to provide good quality pedestrian and cycle links.</p>	<p>Noted and reference made in the footnote where the guidance is cited.</p> <p>Agree – insert 5.26.10  “Careful design of streets can have an impact on vehicle speeds. For example, a road flanked by visible houses and footways is more likely to encourage drivers to obey speed restrictions than those where development is hidden from the driver”.</p> <p>Agree – insert the words at 5.26.12 (ex 5.26.11)  “Balancing security measures, ...”</p>	
Policy 6 Key Movement Routes	Designation of ‘Key Movement Routes’ identifying important walking and cycling routes is welcome, however the plan could also identify routes that are not associated with roads.	Agree – NP to carry out a review of Figure 9.2	
Policy 6 Key Movement Routes	Provision of such infrastructure should be supported and promoted by high quality, deliverable travel plans for new developments and other incentives for existing users and form part of the Neighbourhood Plan.	<p>The NP does not feel that deliverable travel plans for new developments falls solely to the NP and should be part of a wider stakeholder input.</p> <p>The NP is aiming to make the existing network into a high-quality network for the whole village and as such this is covered by the work of the NP.</p>	<b>To be discussed further by the Parish Council and relevant stakeholders</b>
Policy 6 Key Movement Routes	Amend policy 6 - part B, which identifies how development “immediately adjacent” to Key Movement Routes, should address them. Developments that are not immediately		



	<p>adjacent to these routes, could still have potential impacts on these routes. In order to appropriately protect and enhance these routes the following amendment is suggested the policy:</p> <p>“B. Proposals to enhance the identified Key Movement Routes will be supported. <u>Where appropriate development will be expected to:</u></p> <p>a. Ensure the retention and where possible the enhancement of the Key Movement Route; and</p>	<p>Disagree the amendment to the wording as the words ‘where appropriate’ create an uncertainty about where it is appropriate to expect development to do something.</p>	
Policy 6 Key Movement Routes	<p>Amend policy 6 - part B, which identifies how development “immediately adjacent” to Key Movement Routes, should address them. Developments that are not immediately adjacent to these routes, could still have potential impacts on these routes. In order to appropriately protect and enhance these routes the following amendment is suggested the policy:</p> <p>b. Avoid significant detrimental impact on the Key Movement Route and assess and address the impact of the additional traffic movements on the safety and flow of pedestrians and cyclists.”</p>	<p>Agree the amendment to B b should read: “Avoid significant detrimental impact on the Key Movement Route and assess and address the impact of the additional traffic movements on the safety and flow of pedestrians and cyclists.”</p>	
Policy 7	<p>Highway capacity - It is acknowledged that the impact of a scheme should be comprehensively considered but there are likely to be occasions where assessing cumulative impact will not be necessary. As such it is suggested that flexibility is added to the policy by introducing “where appropriate” to its wording.</p>	<p>Disagree as uncertain as to why this is necessary. The principle of assessing cumulative impact is clear, i.e. if something hasn’t been built then you need to assess its impact alongside your proposals. If there are no other such proposals then there is no cumulative impact to assess.</p> <p>Wording will be changed to read: “A. Where a Transport Assessment or Transport Statement is required, this should address the cumulative transport impacts on road junctions.”</p>	
Policy 8	<p>Reference to the Suffolk Parking guidance (2015) in paragraph B of this policy is welcome, however the policy currently restricts the development to which this applies to residential development. The Suffolk Parking Guidance includes standards for different types of development,</p>	<p>Agree – the NP should not be limiting the effects of parking guidance for all developments and all modes of transport. The words “ In the case of residential development” to be removed.</p>	

	including employment and retail development. It also includes standards for different types of vehicles, including bicycles and electric vehicles (which the plan encourages). It is recommended that the phrase “In the case of residential development” is removed from the policy, so as not to limit the effects of the parking guidance for different types of development and vehicles.		
Road Network and Parking	<p>As a result of recent planning approvals developers are required to contribute to highway improvements at:</p> <ul style="list-style-type: none"> <li>• The A143/Thurston Road (Bunbury Arms) Junction to reduce congestion</li> <li>• C692 / C693 Thurston Road (Fishwick Corner) to improve road safety</li> <li>• At the junction of Ixworth Road / Norton Road to improve pedestrian access</li> <li>• Extend the existing 30mph speed limits on Barton Road, Ixworth Road and Norton Road.</li> </ul> <p>It would be helpful if this is acknowledged in the NP even if it is recognised that delivery is dependent on the developments coming forward</p>	<p>Noted but it should be remembered that there are other highway constraints that need addressing not just the ones as recognised by SCC which were related only to the planning applications considered and granted as per the Policy Maps.</p> <p>It is also recognised that delivery of the improvements as outlined by SCC Highways Department is dependent upon all of the developments (5) coming forth.</p>	
Non-Policy Actions – Traffic Calming	The need for Traffic Calming referenced in this table is a matter for discussion with SCC. In the current financial climate, it is unlikely that any funding will be available from the County Council although other sources could be explored.	The NP is aware of the current financial climate, but this is a non-policy action to 2036 and will involve stakeholders other than the NP	
General Comments	Reference to be made to the new NPPF effective July 2018) in particular policy 7 paragraph 32 is now para 108 & 109)	Noted and to be amended where appropriate.	