

# 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

22<sup>nd</sup> February 2021

Dear Mr. Isbell,

**APPLICATION FOR RESERVED MATTERS - DC/20/01249**

**Proposal: Submission of details under Outline Planning Permission 5070/16 - Appearance, Scale, Layout, and Landscaping in respect of Phase 2 – Erection of 104 No. dwellings**

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

**Case Officer: Vincent Pearce**

**Reason for re-consultation: revised drawings submitted 25.01.21.**

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 current form.

Overall it is felt that there is very little difference to that which has been previously submitted and that in the main the Parish Council's objections to this application as outlined in its submission on 5<sup>th</sup> November 2020 remain valid for this submission. For clarity that submission is repeated at Appendix A.

With particular reference to the drawings submitted 25<sup>th</sup> January 2021 the Parish Council would request that the following comments are also borne in mind:

Spatial Strategy

1. The Parish Council does not support the proposed site layout as per drawing P18-2417-21 which allocates 5 parcels of land as "land reserved for further phase of development subject to separate application".
2. The layout fails to adhere to the made Thurston Neighbourhood Development Plan (NDP) (October 2019) which shows an allocation for this site within the made NDP of 200 dwellings – outline planning approval 5070/16.

Layout

3. As has also been mentioned by the Parish Council previously the density and layout of the proposal fails to accord with Policy 1Cc of the Thurston NDP which requires all new development coming forth to design high quality buildings and deliver them in layouts with high quality natural landscaping in order to retain the rural character and physical structure of Thurston.
4. The layout proposed does not conform with a site siting at the very edge of a rural village abutting a rural landscape. There has been significant encroachment on the area previously illustrated / portrayed as green area which results in buildings being set to a rigid building line with terraced housing creating an area that is more akin to an urban town centre development. 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 also sought.

5. The designs being offered are a stock house type which have failed to respect not only the character and appearance of Thurston but also that of Suffolk. The proposal shows a dominant road system thereby creating a layout more suited for an urban rather than a rural setting.
6. Generally, within the site there has been no attempt to create spaces between areas or groups of houses by creating green open spaces. It is noted that the “communal areas” are to the north of the development with little attempt made to use the topography of the area to allow for a design that would create a more interesting street scene. The Parish Council would request that this approach be explored in more detail and that the attempt to “shoehorn” in as many dwellings as possible be resisted at all costs.
7. 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.
8. 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.

#### House Design/Residential Design

9. Thurston’s NDP Policy 4 expects all new development to reflect the scale, mass height and form of neighbouring properties.
10. The Parish Council continues to express disappointment at the lack of intention of ensuring that the density is spread around the development in order to ensure that there is a looser more organic layout with reduced densities to provide a stepped transition from a semi-rural position to rural.
11. As has been mentioned previously by the Parish Council on this and on other significant planning applications within Thurston, it is disappointed to note that there are still a number of 2.5 storey dwellings. As has been stated, 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.
12. The Parish Council is still concerned at the house sizes being proposed and the lack of clarity as to whether all dwellings comply with the sizes laid out under the Nationally Described Space Standard as issued by the government. The Parish Council would request that the comments and recommendations of the Strategic Housing Officer be fully explored.
13. The housing provision for elderly / retired is inadequately catered for within the proposals submitted as there is no change from the provision previously offered. The lack of such a provision fails to take into account the aging population in Thurston as identified within the Thurston NDP and has failed to demonstrate that the proposal has sought to offer future-proofed bungalows and houses suitable for those wishing to downsize.
14. Furthermore, the proposal fails to take account of the Babergh Mid Suffolk District Homes and Housing Strategy 2019-2024 which exemplifies this point by referencing that currently (2019) there are 1 in 5 people over the age of 65 in Suffolk which is expected to rise to 1 in 3 over 20 years’ time.
15. As outlined by the NDP Policy 2 - all new housing proposals will be expected to address the evidence-based needs of the Thurston Neighbourhood area. It is expected that this should also take into account the findings of the Strategic Housing Market Assessment (2019) which stated that over 34.4% of owner-occupied homes by 2036 would require a smaller house.
16. The Parish Council requires the mix of properties being offered to reflect an increase in the number of bungalows offered with a mix of 2 bed and 3 or 4 bed bungalows.

#### Climate Emergency

17. In 2019 Babergh and Mid Suffolk Council declared a climate emergency with aspiration to be carbon neutral by 2030. In line with this, they released the document - Suffolk Guidance for Parking in which it states “Following on from DfT’s recent Road to Zero10 publication and Suffolk County Council’s commitment to make the county of Suffolk carbon neutral by 2030, sufficient provision of electric vehicle charging infrastructure must be made to help meet the governments ambition of all cars and vans being zero emission by 2050”.
18. 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.
19. The Thurston Neighbourhood plan in its commitment to a cleaner, greener alternative to diesel and petrol cars, has highlighted the fact that there are currently no electric charging points in the village and is committed to changing this as part of the infrastructure and future proofing of the village ready for this change in 2030.
20. It is therefore expected that any plans submitted show that this commitment to the community is being recognised. There is no evidence to suggest that the latest application has made any provisions to future proof the dwellings with regards to electric vehicles. There is no indication that they intend to fit the required infrastructure for EV’s in the 198 houses that do not have garages – some 88% of the

proposed build. There is similarly no indication that there will be areas put aside for electric charging stations.

21. The Parish Council would like to see commitments to the community from Linden Homes in the provision of such facilities for not only the proposed development, but also the village as a whole to ensure that the County Council meets future requirements.
22. As such the applicant should clearly demonstrate that it will provide every home with the correct unit to facilitate electric vehicle charging in line with the County Council requirements and the Neighbourhood Plan obligations.
23. In accordance with Policy 4, the Parish Council cannot support new development coming forward that fails to incorporate electric charging points and as such requires that all dwellings should be equipped with EV charging infrastructure.
24. In a declared Climate Emergency, it is essential that all new housing is both passive and sustainable. The Parish Council is concerned to see that there is no detail and/or little reference to sustainability in the shape of a report on Energy Use.
25. The Parish Council requests that a commitment be made by Linden Homes focusing on not only ensuring that all new dwellings have sufficient insulation but also ensuring how dwellings will be adequately ventilated for future residents to ensure that the periods of intense heat in the summer months are experienced in a comfortable manner.
26. The Parish Council would also like clarification as to why there are no comments on energy sources such as the use of renewable, solar panel heating (in all forms) and why there is no provision for water conservation. It seeks reassurances from the Local Planning Authority that this will be fully explored, and the developer required to implement such measures.

#### Ecological & Landscape

27. The Parish Council endorses the comments made by Place Services who have provided a comprehensive report that, if adhered to, will mitigate some of the ecological damage that will be the inevitable consequence of this development. It would also support the proposal for amenity areas to be flowering lawn mixes which improve biodiversity value and will be easier to maintain in the long-term as well as the introduction of carbon sequestering grasses as an alternative to grass and turf options for residential plots and verges.
28. The Parish Council expects that the recommendations of Place Services are accepted and that, in particular, its recommendations in terms of skylark mitigation strategy and wildlife sensitive lighting design scheme are fully implemented.
29. It does however make the comment that overall, the layout, on such a tight scale is generally 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.
30. To accord with the Thurston NDP the Parish Council wishes to have measures implemented that no existing trees or shrubs are to be removed or cut without specific instructions from the Contract Administrator and written agreement of the Local Planning Authority Tree Officer; that all existing trees are to be retained, protected and undisturbed throughout the contract establishment of root protection areas; that any shrubs are to be removed by hand to protect roots; that there is protection of tree canopies and that protected species to be unharmed.
31. The Parish Council wishes to record that it objects to the poisoning of stumps with the use of approved chemicals on this and any other site in Thurston along with the use of chemical weed killer.
32. The monitoring of all of the conditions designed to mitigate the impact that will be had on the biodiversity of this area will be essential if this development goes ahead. The Parish Council can find no evidence of any intention on the part of the developers to engage with the community and/or stakeholders. There is therefore no evidence as to accountability with regard to meeting the conditions outlined in any of the reports submitted and the Parish Council seeks reassurances from the Local Planning Authority that this will be addressed.

#### Play Provision

33. Overall the Parish Council considers the proposals for play provision fails to provide any facilities of recreational or amenity value.
34. The Parish Council is concerned at the proposal for play provision noting that there are no specific details as to where each proposal is to be cited. The proposals for the North West Corner of the Open Space as referenced under LIN22824-15 and that for a of a play area and path through the north of Lady Greene's Plantation as referenced on Drawing LIN22824-11c are vague in location and lacking in quality and quantity given that the proposals are being located to the north of the site and not within reasonable walking distance of the facilities and services of the village.
35. 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. The Parish Council would like to see a facility offered which will be of a demonstrable

recreational or amenity value and should be multi-functional and should be in conformity with Policy 5C of the NDP. 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).

#### Woodland

36. Lady Green Plantation – the Revised Management Plan drawing 228424-50d, date 25/01/21, shows this wood as being under the management of Thurston Parish Council. Clarification on this is required along with details of its transfer to the Parish Council.
37. Copse to the North of Lady Greene Plantation – it is noted from the above drawing that this area is to be maintained by the Management Company alongside the bulk of the open space areas. As this area is an area of woodland listed as a Priority Habitat woodland through which the Thurston stream runs, the Parish Council would like more details on how such a valuable wildlife habitat will be maintained. The Parish Council enquires as to whether this woodland could also be maintained by the Parish Council thereby preserving a valuable asset for perpetuity for the current and future residents of Thurston.

#### Allotments

38. 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. 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 draws reference to the proposed changes to the National Planning Policy Framework which will set an expectation that good quality design will be approved while poor quality will be rejected and includes a commitment to ensure that all streets are lined with trees. Furthermore, the Rt Hon Robert Jenrick MP has stated that developments should ensure that they reflect and enhance their surroundings and preserve local character and identity. The Parish Council therefore submits that the Local Planning Authority should ensure that this application in its current form is rejected and that further amendments be sought to ensure that current and new residents are able to benefit from a well-designed neighbourhood that preserves and enhances the location in which it is set.

Yours sincerely,

*Victoria S Waples*

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

“The Parish Council objects to the application on the grounds that the density has been increased by incorporating similar numbers into the area expected for Phase 2 but on a much smaller area thereby leaving other areas for a further application to be submitted. 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.

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. Generally there is an urban feel to the dwellings being proposed and the Parish Council is disappointed that this has been the tone for the remaining phase of this development.

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.

The Parish Council would request that the application be refused until the following concerns are addressed:

- Density of the build – there is a significant urban feel to the design which neither complements nor enhances the village. Overall the density, by limiting the scheme to a much smaller area, has increased and fails not only to respect the spatial strategy within the village but also that of Phase 1.
- 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 are of open space have a looser more organic layout with reduced densities to provide a stepped transition from urban to rural.
- The Parish Council therefore contends that there should be a more rural feel to the development coming forth under Phase 2 and wishes to see a less regimented form of design with the use of cul-de-sacs to avoid the ‘tunnel’ effect. Given the location of Phase 2 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.
- 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 24<sup>th</sup> 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.
- Mixture of house types – the Parish Council acknowledges that there is a mix of house types and sizes within the 2<sup>nd</sup> phase and 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.
- Parking – although it is stated that the scheme has complied with the Suffolk County Council Parking Standards (2015), there is a concern that the provision of a total of 198 allocated parking spaces and only 26 garage spaces is insufficient for the mix of houses on the site. It is noted that paragraph 6.23 states that provision is made for cycle parking within garages and within the curtilage of the dwellings. Given that there are only 26 garage spaces on the site (Phase 2), it is difficult to see how the security of cycles will be accommodated.
- 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. In total there are only 17 visitor spaces. The Parish Council would like to see a revised layout showing adequate visitor parking suitably located and accessible for use. The Parish Council is also concerned that the layout shows a significantly reduced level of parking provision for rented/shared ownership homes.
- With regards to play provision the Parish Council is disappointed, once again, to read that there is no 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 1<sup>st</sup> submission for Reserved Matters 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. The Parish Council formally requests that such a facility 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.

- The Parish Council therefore requires that this provision be included within the second phase and takes advantage of the woodland areas.
- 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.

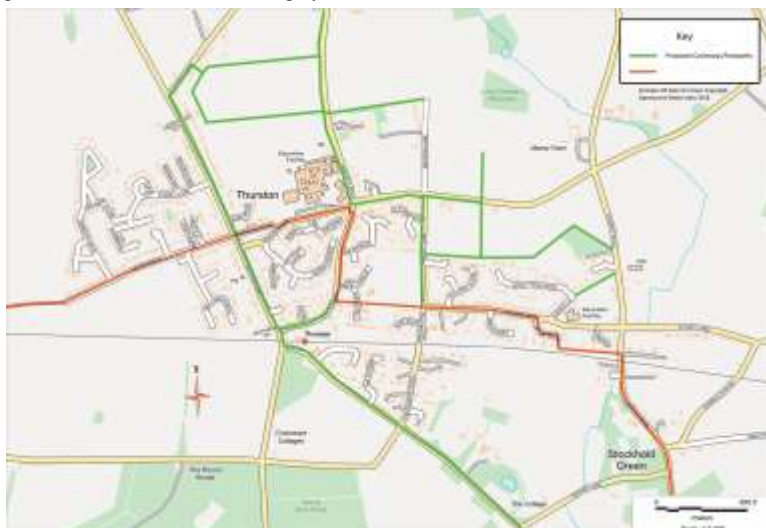
The Parish Council is disappointed to state that despite requesting, on a number of occasions, clarification from the Planning Officer at Mid Suffolk District Council as to whether there had been discussions with the applicant over the proposed uplift in numbers, no response has yet been received from Mid Suffolk Planning Department.

It is further disappointed that the request by the Mid Suffolk Planning Referrals Committee of 24<sup>th</sup> 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 that the Planning Statement as submitted by the applicant states that a pre-application engagement relating to the second development has held in November 2019 which was attended by Officers of Mid Suffolk District Council, the Applicant, and members of the Project Team. It is stated that the meeting was held in a constructive and positive manner. The Parish Council confirms that it was not made aware of this meeting.

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 1<sup>st</sup> April 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.

Furthermore the Parish Council notes the comments made by the Senior Planning and Infrastructure Officer Planning Section, Strategic Development that 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 will be needed 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 should be rejected in its current form and that the matters raised are considered further prior to permission being granted.