

Our ref: Haverhill – Great Wilsey Park  
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Mr Chris Rand,  
Principal Planning Officer,  
St Edmundsbury Borough Council,  
West Suffolk House,  
Western Way,  
Bury St Edmunds,  
Suffolk,  
IP33 3YU

Dear Mr Rand,

### **Haverhill: Great Wilsey Park – developer contributions**

**Outline Application (Means of Access to be considered) - Residential development of up to 2,500 units (within use classes C2/C3); two primary schools; two local centres including retail, community and employment uses (with use classes A1/A2/A3/A4/A5, B1 and D1/D2; open space; landscaping and associated infrastructure**

Thank you for you consulting Suffolk County Council on the above proposal, and for the additional time to allow us to prepare this response.

This site seeks to be in line with the strategy set by the adopted 2010 St Edmundsbury Core Strategy, specifically Policy CS12 which notes that this site should:

[...]

- *Provide improved public transport, foot and cycle links to the town centre and other locally significant leisure, employment and service destinations;*
- *Deliver additional education, community and leisure facilities to meet the needs of this development and is located in a way that can achieve positive integration with the wider area;*

[...]

The St Edmundsbury Core Strategy also includes Policy CS14 which underscores the importance of ensuring a mechanism for delivering necessary infrastructure.

The strategic approach to Haverhill is reinforced by the adopted Area Action Plan; Haverhill Vision 2031; and adopted masterplans and concept statements for this site.

I set out below Suffolk County Council's views, which provides an illustration of the infrastructure requirements and need to be considered by St Edmundsbury Borough Council. The County Council will need to be a party to any sealed Section 106 legal agreement if it includes obligations which are its responsibility as service provider. Without the following contributions being agreed between the applicant and the local planning authorities, the development cannot be considered to accord with relevant policies.

The National Planning Policy Framework (NPPF) at paragraphs 203 – 206, sets out the requirements of planning obligations, which require they must meet the following tests:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and,
- c) Fairly and reasonably related in scale and kind to the development.

Please also refer to the adopted 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk', which sets out our authorities' shared approach to calculating infrastructure needs.

## **1. Education**

Refer to the NPPF paragraph 72 which states 'The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education'.

The NPPF at paragraph 38 states 'For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.'

SCC would anticipate the following minimum pupil yields from a development of 2,500 dwellings, namely:

- a. Primary school age range, 5-11: 625 pupils.
- b. Secondary school age range, 11-16: 450 pupils. Cost per place is £18,355 (2015/16 costs).
- c. Secondary school age range, 16+: 100 pupils. Costs per place is £19,907 (2015/16 costs).

The agreed strategy reflected in the adopted Masterplan is to establish two new on-site primary schools. It has been agreed that the applicant will provide two free sites, together with contributions towards the full build costs of a new 420 place (2 forms of entry) primary school and a 210 place (1 form of entry) primary school.

The 420 place primary school site needs to be a minimum size of 2.2 hectares and the 210 place primary school (indicative size as could be larger due to higher birth rates) needs to be a minimum size of 2 hectares. This position was stated through pre-application advice (dated 29<sup>th</sup> July 2015) and a supplementary letter on school sites (dated 24<sup>th</sup> July).

Parameter Plan 5055-ES-01 Rev. G, submitted as part of the application, identifies the 2.2ha site for the 420 – place school and marks it as ‘B1’. The second school site is identified as ‘B2’ but the legend for this plan states that this site is intended to be 1.5ha. This is insufficient because it doesn’t enable a response to future growth. It is not a sustainable solution. **This matter will need to be resolved through the application process.** In addition the suggestion to provide the ‘smaller’ one form entry primary school to serve the greater proportion of housing needs to be re-considered, as this doesn’t support the aspirations of the NPPF.

The primary school sites must be rectangular in shape, on level ground and located on a gyratory road (i.e. not in a cul-de-sac) near to the centre of the development and close to other community facilities. The sites must be free of contamination and cleared of any previous land use. The developer will also provide services to the appropriate boundary of the sites, including adequate access by motor vehicle and on foot, ICT connections, gas, electric and water supplies plus outlet to the local sewer system. This will be provided free of charge to the county council. The cost of all archaeological surveys and remedial work will be met by the developer.

SCC would welcome further discussions about the intended phasing of the development so that we can agree suitable trigger points for the transfer of the school sites to enable early delivery of these essential pieces of community infrastructure.

The estimated build cost of a new 420 place primary school is £6.9m (source: Developers Guide education topic paper Table 2). This equates to £16,429 per pupil place. The estimated build cost of a new 210 place primary school is £4.35m (source Developers Guide education topic paper Table 2). This equates to £20,714 per place.

As highlighted in pre-application advice, temporary school places will also be required. Given the position of the first school (within Phase 1B of the development), it cannot be open for first occupation of site. Neither would this be good practice; to open the school in advance of demand for places would result in pupils coming from off site and taking up places so that children from latter phases of the site can’t use them, and creating unnecessary demand for travel.

The most efficient option would be to seek to have the first school open in time for the occupation of the 300<sup>th</sup> dwelling. To manage the children emanating from the development prior to the opening of the school, a temporary double classroom would be required, to be placed at a nearby primary school. This costs in the region of **£250,000**.

Also highlighted in pre-application advice was the potential need for travel costs. Should children in the early phases of the development not be able to access schools by safe routes, this creates a cost to the taxpayer. The average annual cost per pupil is estimated to be £959. The need for pupil transport contributions will depend on the timing of connections from the new dwellings to walking and cycling routes to temporary provision at existing schools.

The local secondary schools in Haverhill are Samuel Ward Academy and Castle Manor Academy.

At the secondary level we will need further discussions with the head teachers and governing bodies of both Samuel Ward Academy and Castle Manor Academy about how contributions will be spent between the two schools, but the scale of contribution requested is set out below.

1. Free transfer of land on the basis of a 999 year lease (the site area to be agreed) for use by Samuel Ward Academy.
2. Pupils of ages 11-16 is  $450 \times \text{£}18,355 = \text{£}8,259,750$  (2015/16 costs).
3. Sixth form provision is  $100 \text{ places} \times \text{£}19,907 \text{ per place} = \text{£}1,990,700$  (2015/16 costs).

The scale of contributions is based on the capital cost of providing a school place, which are reviewed annually to reflect changes in construction costs. The figures quoted will apply during the financial year 2015/16 only and have been provided to give a general indication of the scale of contributions required should residential development go ahead. The sum will be reviewed at key stages of the application process to reflect the projected forecasts of pupil numbers and the capacity of the schools concerned at these times. Once the Section 106 legal agreement has been signed, the agreed sum will be index linked using the BCIS index from the date of the Section 106 agreement until such time as the education contribution is due. SCC has a 10 year period from completion of the development to spend the contribution on education provision.

Clearly, local circumstances may change over time and I would draw your attention to paragraph 13 where this information is time-limited to 6 months from the date of this letter.

## 2. Pre School Provision

Refer to the NPPF 'Section 8 Promoting healthy communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. Section 7 of the Childcare Act sets out a duty to secure free early years provision for pre-school children of a prescribed age. The current requirement is to ensure 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Bill 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds. The Government has signalled the intention that from September 2017 the entitlement to free provision will be extended to 30 hours per week.

From these development proposals we would anticipate 250 pre-school pupils. Given that these will be entirely new settings (which are more expensive to provide than expanding existing settings), we have updated costs from the pre-application information in order to take this into account.

Two 26 – place nursery settings, each providing places for 52 children (104 children in total) will be required. These will be located at each of the place primary schools (using just over 640m<sup>2</sup> of that school site) at a cost of **£624,105** each.

A 73 – place nursery setting providing places for 146 children will be required in one of the local centres at a cost of **£1,076,774** and with 1,400m<sup>2</sup> of free land with services to the boundary

These requests are based on the latest estimate of the costs of building new early education settings, with a total of **£2,324,984** towards the construction of early years provision.

### **3. Play Space Provision**

Consideration will need to be given to adequate play space provision. A key document is the 'Play Matters: A Strategy for Suffolk', which sets out the vision for providing more open space where children and young people can play. Some important issues to consider include:

- a. In every residential area there are a variety of supervised and unsupervised places for play, free of charge.
- b. Play spaces are attractive, welcoming, engaging and accessible for all local children and young people, including disabled children, and children from minority groups in the community.
- c. Local neighbourhoods are, and feel like, safe, interesting places to play.
- d. Routes to children's play spaces are safe and accessible for all children and young people.

### **4. Transport Requirements**

Refer to the NPPF 'Section 4 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a planning application. This will include full consideration of pedestrian & cycle provision, public transport services and infrastructure (bus stops, RTPI etc.), rights of way, walking and cycling, air quality and highway provision (both on-site and off-site).

Transport requirements, necessary to make the development acceptable, can only be agreed following receipt of full application details including a detailed Transport Assessment. Requirements will be dealt with via planning conditions and Section 106 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. This will be coordinated by Suffolk County Council FAO Graeme Mateer and Samantha Bye.

Suffolk County Council, in its role as local Highway Authority, has worked with the local planning authorities to develop county-wide technical guidance on parking which replaces the preceding Suffolk Advisory Parking Standards (2002) in light of new national policy and local research. It has been subject to public consultation and was adopted by Suffolk County Council in November 2014.

### **5. Libraries**

Refer to the NPPF 'Section 8 Promoting healthy communities'. The capital contribution towards libraries arising from this scheme is **£540,000**, which would be available to spend to enhance service provision at the local library in Haverhill. In addition an outreach library facility should be established in the development (probably best delivered by sharing space within a community hub building). The service will provide permanent pick up and drop off facilities for the lending of books, IT services available to the community and outreach staff from the main Haverhill library.

The specific balance of mitigation between the main Haverhill Library and provision on this site will need to be discussed with Suffolk Libraries, who manage the library service on behalf, and managers at Haverhill Library itself. It is envisaged that at least 10m<sup>2</sup> of floor space will be needed within/alongside other community facilities.

A minimum standard of 30 square metres of new library space per 1,000 populations is required. Construction and initial fit out cost of £3,000 per square metre for libraries (based on RICS Building Cost Information Service data but excluding land costs). This gives a cost of (30 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling.

## **6. Waste Infrastructure**

Site waste management plans have helped to implement the waste hierarchy and exceed target recovery rates and should still be promoted. The NPPF in paragraph 162 requires local planning authorities to work with others in considering the capacity of waste infrastructure. A waste minimisation and recycling strategy needs to be agreed and implemented by planning conditions. Refer to the Waste Planning Policy Statement, the Suffolk Waste Plan and the Joint Municipal Waste Management Strategy in Suffolk.

The waste disposal facilities topic paper sets out the detailed approach to how contributions are calculated. A contribution of £51 per dwelling is sought i.e. **£127,500**, which will be spent on enhancing provision in Haverhill.

Policy WDM17 of the Waste Core Strategy encourages the provision of a bring site within major development sites.

We would request that a bring site(s) area will be provided within the Local Centre(s), and waste bins and garden composting bins will be provided before occupation of each dwelling and this will be secured by way of a planning condition. We would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

## **7. Housing Mix**

This development should provide a housing mix which reflects the needs of the area. Haverhill Vision 2031 makes specific reference to the needs of older people and the Lifetime Neighbourhoods model.

The decision to include an Extra Care housing scheme within the development is expected to make a positive contribution to meeting the housing needs of the area. However, it is understood that discussions will take place with colleagues in the Housing Team at St Edmundsbury Borough Council as regards the specific housing needs of the Haverhill area. It may be that there is greater demand for a residential care home, as an example. The County Council would be pleased to support discussions on this topic, if requested by the Borough Council.

Policy DM22 of the West Suffolk Joint Development Management Policies recognises the need for residential development to be 'adaptable in terms of lifetime changes and use.' Paragraph 5.4 of the Design and Access Statement accompanying this application states that a proportion of the development will be provided as specialist housing for the elderly. In order to fulfil the requirement in DM22 around adaptability, a proportion of the housing on this site ought to be constructed to the M4(2) and M4(3) standards (as set out in the Building Regulations following the Housing Standards Review) in addition to the specialist housing proposed.

## **8. Surface Water Management**

Refer to the NPPF 'Section 10 Meeting the challenges of climate change, flooding and coastal change'. On 18 December 2014 there was a Ministerial Written Statement made by The Secretary of State for Communities and Local Government (Mr Eric Pickles). The changes will take effect from 06 April 2015.

"To this effect, we expect local planning policies and decisions on planning applications relating to major development - developments of 10 dwellings or more; or equivalent non-residential or mixed development (as set out in Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010) - to ensure that sustainable drainage systems for the management of run-off are put in place, unless demonstrated to be inappropriate.

Under these arrangements, in considering planning applications, local planning authorities should consult the relevant lead local flood authority on the management of surface water; satisfy themselves that the proposed minimum standards of operation are appropriate and ensure through the use of planning conditions or planning obligations that there are clear arrangements in place for ongoing maintenance over the lifetime of the development. The sustainable drainage system should be designed to ensure that the maintenance and operation requirements are economically proportionate."

Comments on this application have been provided by my colleague Steven Halls.

## **9. Fire and Rescue**

Any fire hydrant issues will need to be covered by appropriate planning conditions. Particular consideration will need to be given to the proposed extra care facility. SCC would strongly recommend the installation of automatic fire sprinklers. The Suffolk Fire and Rescue Service requests that early consideration is given during the design stage of the development for both access for fire vehicles and the provisions of water for fire-fighting which will allow us to make final consultations at the planning stage.

## **10. Health**

An assessment of the likely impact of the development proposals on local health infrastructure, facilities and funding will need to be undertaken, in conjunction with a methodology to be agreed with NHS England via its agent Lawson Planning Partnership Ltd (Mrs Aarti O'Leary).

In addition to health infrastructure, the detailed design of this site (to be determined through reserved matters applications and, insofar as is set through this outline permission) should ensure that the design of the site promotes healthy lifestyles in line with St Edmundsbury Core Strategy Policy CS2. Some specific ways of encouraging healthy lifestyles amongst residents include:

- Access to jobs, services and recreation opportunities (such as, in particular, the countryside) via walking and cycling routes.
- An appropriate housing mix which meets the needs of different groups in society, including older and vulnerable people.
- An open layout which also enables natural surveillance.
- Opportunities for exercise and social interaction, including sports facilities and open space in line with Borough Council requirements. Specific consideration needs to be given to play facilities for young children and opportunities for older children to exercise and socialise.
- Design features across all types of development in this mixed use site which meet the requirements of an ageing population. The Lifetime Neighbourhoods model, referenced in Haverhill Vision 2031, is a useful guide as to how this requirement can be managed and assessed.

### **11. Superfast Broadband**

SCC would recommend that all development is equipped with superfast broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion. Direct access from a new development to the nearest BT exchange is required (not just tacking new provision on the end of the nearest line). This will bring the fibre optic closer to the home which will enable faster broadband speed. Refer to the NPPF paragraphs 42 – 43.

### **12. Legal Costs**

SCC will require an undertaking for the reimbursement of its own legal costs regarding any work undertaken on the S106A, whether or not the matter proceeds to completion.

### **13. Time Limits**

The above information is time-limited for 6 months only from the date of this letter.

I consider that the contributions requested are justified and satisfy the requirements of the NPPF and the Community Infrastructure Levy (CIL) 122 & 123 Regulations.

Yours sincerely,

Neil McManus BSc (Hons) MRICS  
Development Contributions Manager  
Strategic Planning – Resource Management