

Your ref: 21/0315/FUL
 Our ref: 60139
 Date: 29 March 2021
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By e-mail only:
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FAO Penny Mills

Dear Penny,

Re: Little Court Haverhill Road Little Wratting CB9 7UD – Developer Contributions response

Please find below a response to the following application: Planning application - Specialist dementia care village for up to 120 residents, including: 20 x 6 bedroom apartments provided within five buildings; central amenity building containing shop, restaurant, pub, communal hall, offices and staff accommodation; club/hobby rooms; treatment/counselling rooms; vehicle and cycle parking; landscaping proposals and associated works.

Summary Table – S106 contributions

The table below should be secured by a planning obligation if a planning permission was to be granted. Justification is identified in the proceeding sections of this letter. S106 monitoring fee is set out in para 13.

| Service Requirement | Contribution per dwelling | Capital Contribution |
|----------------------------------|---------------------------|----------------------|
| Primary School | £0.00 | £ 0.00 |
| Early Years | £0.00 | £ 0.00 |
| Secondary School contribution | £0.00 | £ 0.00 |
| Secondary school age range, 16+: | £0.00 | £ 0.00 |
| Libraries | £90.00 | £10,800.00 |
| Waste | £0.00 | £0.00 |
| Transport | tbc | |
| Total | £90.00 | £10,800.00 |

Paragraph 56 of the National Planning Policy Framework (NPPF) 2019 sets out the requirements of planning obligations, which are that they must be:

- 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.

The County and Borough Council have a shared approach to calculating infrastructure needs, in the adopted [Section 106 Developers Guide to Infrastructure Contributions in Suffolk](#).

The St. Edmundsbury Core Strategy, adopted December 2010, includes the following objectives and policies relevant to providing infrastructure:

- Strategic Objective 1 seeks to ensure that new development occurs where there is adequate capacity in existing services, facilities and infrastructure or where this capacity can reasonably be provided.
- Policy CS14 sets out the Councils approach to the sequential development of sites and community infrastructure capacity tariffs.

The Haverhill Vision adopted September 2014 sets out a presumption in favour of sustainable development in Policy BV1. The Forest Heath and St Edmundsbury Joint Development Management Policies document was adopted by St Edmundsbury on 24th February 2015. In addition, Policy DM1 of the Development Management Policies sets out a presumption in favour of sustainable development.

A new issues and options Local Plan was out for consultation late last year.

Site specific mitigation will be covered by a planning obligation and/or planning conditions.

The details of specific S106 contribution requirements related to the proposed scheme are set out below:

- 1. Education.** Paragraph 94 of the NPPF states: 'It is important 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. They should:
 - a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and
 - b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.'

Furthermore, the NPPF at paragraph 104 states: 'Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;'

The table below is a summary of the education contribution:

| School level | Minimum pupil yield: | Required: | Cost per place £ (2020): |
|----------------|----------------------|-----------|--------------------------|
| Primary school | 0 | 0 | 17,268 |

| | | | |
|------------------------------------|---|---|--------|
| age range, 5-11: | | | |
| Secondary school age range, 11-16: | 0 | 0 | 23,775 |
| Secondary school age range, 16+: | 0 | 0 | 23,775 |

| | |
|--------------------------------|---------------|
| Total education contributions: | £ 0.00 |
|--------------------------------|---------------|

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'

Education for early years should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities'. It is the responsibility of SCC to ensure that there is sufficient local provision under the Childcare Act 2006. The Childcare Act in Section 7 sets out a duty to secure free early years provision and all children in England receive 15 free hours free childcare. Through the Childcare Act 2016, from September 2017 families of 3 and 4 year olds may now be able to claim up to 30 hours a week of free childcare. The guidance from the Department for Education on Delivering schools to support housing growth states in paragraph 16: "Developer contributions for early years provision will usually be used to fund places at existing or new school sites, incorporated within primary or all-through schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school".

| | Minimum number of eligible children: | Required: | Cost per place £ (2020): |
|----------------------------|--------------------------------------|-----------|--------------------------|
| Pre-School age range, 2-4: | 0 | 0 | 17,268 |

| | |
|------------------------------------|---------------|
| Required pre-school contributions: | £ 0.00 |
|------------------------------------|---------------|

- 3. Play space provision.** This should be considered as part of addressing the requirements of the NPPF Section 8: 'Promoting healthy and safe communities.' A further key document is the 'Quality in Play' document fifth edition published in 2016 by Play England. In reference to paragraph 2, the proposed development is not set to generate pre-school numbers.

- 4. Transport issues.** The NPPF at Section 9 promotes sustainable transport. A

comprehensive assessment of highways and transport issues is required as part of any planning application. This will include travel plan, pedestrian and cycle provision, public transport, rights of way, air quality and highway provision (both on-site and off-site). Requirements will be dealt with via planning conditions and Section 106 agreements as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278.

In its role as Highway Authority, Suffolk County Council has worked with the local planning authorities to develop county-wide technical guidance on parking in light of new national policy and local research. This was adopted by the County Council in November 2014 and replaces the Suffolk Advisory Parking Standards (2002). The guidance can be viewed at

<https://www.suffolk.gov.uk/assets/planning-waste-and-environment/planning-and-development-advice/Suffolk-Guidance-for-Parking-2019-Adopted-by-SCC.pdf>

Suffolk County Council FAO Sam Bye will coordinate a response.

- 5. Libraries.** The NPPF 'Section 8 Promoting healthy and safe communities', promotes 'social interaction' in paragraph 91 (subsection a), and 'community facilities', 'public houses' and 'cultural well-being (paragraph 92, subsection a and b). 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.

Using the established methodology, the capital contribution towards libraries arising sought from this scheme is stated below and would be spent to support improved services and outreach at Haverhill Library.

| | |
|-------------------------|-------------------|
| Libraries contribution: | £10,800.00 |
|-------------------------|-------------------|

- 6. Waste.** All local planning authorities should have regard to both the Waste Management Plan for England and the National Planning Policy for Waste when discharging their responsibilities to the extent that they are appropriate to waste management. The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

SCC requests that waste bins and garden composting bins should be provided before occupation of each dwelling and this will be secured by way of a planning condition. SCC would also encourage the installation of water butts connected to gutter down-pipes to harvest rainwater for use by occupants in their gardens.

| | |
|---------------------|---------------|
| Waste Contribution: | £ 0.00 |
|---------------------|---------------|

- 7. Supported Housing.** As noted above, this proposal would be meeting a need for people with learning difficulties.

Section 5 of the NPPF seeks to deliver a wide choice of high-quality homes. Supported Housing provision, including Extra Care/Very Sheltered Housing providing accommodation for those in need of care, including the elderly and people with learning disabilities, needs to be considered in accordance with paragraphs 61 to 64 of the NPPF.

Following the replacement of the Lifetime Homes standard, designing homes to Building Regulations Part M 'Category M4(2)' standard offers a useful way of meeting this requirement, with a proportion of dwellings being built to 'Category M4(3)' standard.

In this respect I have copied this letter to Shirley Mutumburi, Head of Contracts and Service Development, in the SCC Adult and Community Services Directorate in respect of the Care Home proposals.

- 8. Health impact assessment.** 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 the NHS and other health bodies.
- 9. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Paragraphs 155 – 165 refer to planning and flood risk and paragraph 165 states: 'Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:
 - a. take account of advice from the lead local flood authority;
 - b. have appropriate proposed minimum operational standards;
 - c. have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and
 - d. where possible, provide multifunctional benefits.'

In accordance with the NPPF, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriately.

A consultation response will be coordinated by Suffolk County Council FAO Denis Cooper.

- 9. Fire Service.** The Suffolk Fire and Rescue Service requests that early consideration is given to access for fire vehicles and provision of water for fire-fighting. The Suffolk Fire and Rescue responded 1 October 2019. The provision of any necessary fire hydrants will need to be covered by appropriate planning conditions.

Suffolk Fire and Rescue Service (SFRS) seek higher standards of fires safety in dwelling houses and promote the installation of sprinkler systems and can provided support and advice on their installation.

10. Superfast broadband. This should be considered as part of addressing the requirements of the NPPF Section 10 'Supporting high quality communications.' SCC would recommend that all development is equipped with high speed broadband (fibre optic). This facilitates home working which has associated benefits for the transport network and also contributes to social inclusion, it also impacts educational attainment and social wellbeing, as well as impacting property prices and saleability.

As a minimum, access line speeds should be greater than 30Mbps, using a fibre based broadband solution, rather than exchange-based ADSL, ADSL2+ or exchange only connections. The strong recommendation from SCC is that a full fibre provision should be made, bringing fibre cables to each premise within the development (FTTP/FTTH). This will provide a network infrastructure which is fit for the future and will enable faster broadband.

11. Legal costs. SCC will require an undertaking for the reimbursement of its own legal costs, whether or not the matter proceeds to completion.

12. Monitoring Fee. The CIL Regs allow for charging of monitoring fees. In this respect the county council charges **£500** for each trigger point in a planning obligation, payable upon commencement.

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

Yours sincerely,



Peter Freer MSc MRTPI
Senior Planning and Infrastructure Officer
Growth, Highways & Infrastructure Directorate

cc SCC, Samantha Bye
SCC, Developer Contributions
SCC, Public Health
SCC, Shirley Mutumburi