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Our ref: 00045344
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Penelope Mills
Senior Planning Officer
Planning and Growth
St Edmundsbury Borough Council
West Suffolk House
Western Way,
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IP33 3YU

Dear Penny,

Re: The Vixen, Millfields Way, Haverhill Suffolk - Renovations and extensions to allow change of Public House to form 18no residential flats and and 2no units for retail, commercial or Offices

I refer to the planning application consultation for the above application.

Proposed number of dwellings from development:	1 bedroom apartments	2 bedroom+ apartment/Houses	Total
	9	9	18

I set out below Suffolk County Council's views, which provides our infrastructure requirements associated with this application and this will need to be considered by the Council. This follows my pre-application response sent 15 March 2016.

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 authority, the development cannot be considered to accord with relevant policies.

The National Planning Policy Framework (NPPF) paragraph 204 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 District Councils have a shared approach to calculating infrastructure needs, in the adopted Section 106 [Developers Guide to Infrastructure Contributions in Suffolk](#).

The Forest Heath Core Strategy was adopted in May 2010 and includes the following objectives and policies relevant to infrastructure:

- Spatial Objective ENV7 seeks to achieve more sustainable communities by ensuring facilities and services and infrastructure are commensurate with development.
- Policy CS13 relates to arrangements for infrastructure and developer contributions in Forest Heath.

The Forest Heath and St Edmundsbury Joint Development Management Policies document was adopted by Forest Heath on 27th February 2015. Policy DM1 of the Development Management Policies sets out a presumption in favour of sustainable development.

Community Infrastructure Levy

Although CIL is not currently in use in West Suffolk work has begun to explore its introduction but at this time no final decision has been made to introduce it. As of 6th April 2015, the 123 Regulations restrict the use of pooled contributions towards items that may be funded through the levy, even where there is none in place. The requirements being sought here would meet the new legal test however it is anticipated that the District Council is responsible for monitoring infrastructure contributions being sought.

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

- 1. Education.** NPPF paragraph 72 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.'

School level	Minimum pupil yield:	Required:	Cost per place £ (2015/16):
Primary school age range, 5-11:	2	0	12,181
Secondary school age range, 11-16:	1	0	18,355
Secondary school age range, 16+:	0	0	19,907

Total education contributions:	£ 0.00
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The local catchment schools are Haverhill Westfield Primary Academy and Haverhill Samuel Ward Academy. We currently forecast to have insufficient places at the catchment schools to accommodate the children arising.

Primary School

Under the section 106 pooling limitations the County Council has decided not to request a contribution for the proposed development. It is understood that there are limited surplus primary school places outside of the Westfield Primary catchment in Haverhill, but clearly parents who live in Haverhill may not be able to get their children into the catchment Primary School at Haverhill Westfield Primary Academy.

Secondary School

There are surplus secondary school places available at Castle Manor Academy, which is not the catchment secondary school but is 1 mile away from the application site.

Therefore, on this occasion we do not require contributions for the additional places arising.

- 2. Pre-school provision.** Education for early years should be considered as part of addressing the requirements of 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 Act 2011 amended Section 7, introducing the statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

Through the Childcare Act 2016, the Government will be rolling out an additional 15 hours free childcare to eligible households from September 2017.

There are 3 Early Years providers in the vicinity of this development with 0 spaces available. From this development, based on the mix, we do not anticipate the need for pre-school pupils contributions.

	Minimum number of eligible children:	Required:	Cost per place £ (2015/16):
Pre-School age range, 2-4:	0	0	6,091

Required pre-school contributions:	£ 0.00
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- 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 issues.** The NPPF at Section 4 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. This will be co-ordinated by Samantha Bye of Suffolk County Highway Network Management.

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

<http://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Planning/2014-11-27%20Suffolk%20Guidance%20for%20Parking.pdf>

- 5. 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.

Paragraph 8 of the National Planning Policy for Waste states that when determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.

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
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- 6. Supported Housing.** Section 6 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, may need to be considered as part of the overall affordable housing requirement. We would encourage all homes to be built to the 'Lifetime Homes' standard.
- 7. Sustainable Drainage Systems.** Section 10 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. National Planning Practice Guidance notes that new development should only be considered

appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems.

On 18 December 2014 the secretary of State for Communities and Local Government (Mr Eric Pickles) made a Ministerial Written Statement (MWS) setting out the Government's policy on sustainable drainage systems. In accordance with the MWS, when considering a major development (of 10 dwellings or more), sustainable drainage systems should be provided unless demonstrated to be inappropriate. The MWS also provides that in considering:

“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 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.”

The changes set out in the WMS took effect from 06 April 2015.

- 8. 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 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 provide support and advice on their installation.

- 9. High-speed broadband.** 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.

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

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

12. Summary Table

Service Requirement	Contribution per dwelling	Capital Contribution
Education - Primary	£0.00	£ 0.00
Education – Secondary	£0.00	£ 0.00
Education – Sixth Form	£0.00	£ 0.00
Pre-School Provision	£0.00	£0.00
Transport	£0	£0.00
Libraries	£0.00	£0.00
Waste	£0.00	£0.00
Total	£ 0.00	£ 0.00

Based on the mix and scale of this development we do not require any developer contributions on this occasion.

Yours sincerely,

P J Freer

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Planning Section, Strategic Development, Resource Management Directorate

cc Neil McManus – SCC
Iain Maxwell - SCC