

MID SUFFOLK DISTRICT COUNCIL

DEVELOPMENT CONTROL COMMITTEE A MEETING 13.02.19

INDEX TO LATE REPRESENTATIONS/SUPPLEMENTARY PAPERS

<u>ITEM</u>	<u>REF. NO</u>	<u>Representation From</u>	<u>Summary/Comments</u>	<u>Case Officer</u>	<u>PAGE NO</u>
7a	DC/18/03592	SCC Developer Contributions	Consultee comments	JPG	1-6

Your ref: DC/18/03592/OUT
Our ref: Haughley – land at Haughley Park
(former poultry factory) 00050862
Date: 30 January 2019
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Mr John Pateman-Gee,
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Dear John,

Haughley: land at Haughley Park (former poultry factory) – developer contributions

I refer to the proposal: outline planning permission (all matters reserved) except the access point for the demolition of existing industrial buildings and construction of 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works.

I provided pre-application advice by way of letters dated 12 March 2018 and 19 March 2018. A consultation response was submitted by way of letter dated 10 September 2018. On 14 November 2018 I submitted a holding objection on behalf of Suffolk County Council. This letter provides an update for consideration by Mid Suffolk District Council, as the relevant local planning authority and decision-maker.

As previously highlighted, the County Council would like to see a plan-led approach to housing growth in the Haughley locality, which would also clearly identify the infrastructure requirements based on cumulative growth. The risk here is that individual developer-led applications are granted planning permission without proper consideration being given to the cumulative impacts on essential infrastructure including highway impacts, early years and primary school provision. The revised NPPF in paragraphs 38 – 50 sets out the approach to decision-making. In paragraph 41 it says, “The more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits.”

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 District Council Joint Local Plan consultation document (Regulation 18) was published on 21 August 2017. The merits of this development proposal must be considered against this emerging document, plus other local planning policies and the NPPF. It is suggested that consideration should be had to the published call for sites submission document (April 2017) – with an initial consideration by the District's planning policy team set out in the SHELAA (August 2017). The SHELAA identifies sites considered with potential capacity for future development and sites which have been discounted.

This letter sets out views in respect of sustainability issues linked with primary school and secondary school provision. A proposed development of this scale and size in this isolated location has a number of significant deficiencies in respect of delivering sustainable development.

There are no safe walking routes to primary or secondary schools. At the heart of the NPPF is the need to deliver sustainable development – without creating safe walking/cycling routes will be contrary to the principles of the NPPF. The applicant relies on primary-age and secondary-age pupils being bussed on an ongoing basis to schools, which will result in a legacy of an unsustainable pattern of school provision.

I would refer the District Council to the planning appeal under reference APP/W3520/W/16/3159634 – land adjacent to Cherry Tree Close, Yaxley, Suffolk, IP23 8DH – where limited services and transport inefficiencies weighed heavily against the proposal for 15 dwellings and the appeal was dismissed based on a non-sustainable location. In order to achieve sustainable development, the NPPF identifies that economic, social and environmental gains must be sought jointly and simultaneously. In the Yaxley appeal decision the Inspector concluded in paragraph 34 that *"However, I have found that the site would not represent a rural exception site and the social and environmental harm I have identified in respect of its isolation from services and facilities would be significant."* The County Council's view is that 149 dwellings in this isolated location would give rise to greater social and environmental harm than that identified by the Inspector in the Yaxley scheme for 15 dwellings.

Section 508A of the Education Act 1996 places a general duty on the County Council to promote the use of sustainable travel and transport. The Act defines sustainable modes of travel as those that the local authority considers may improve the physical well-being of those who use them, the environmental well-being of all or part of the local authority's area or a combination of the two. The Department for Education's guidance on the above duty states that it should have a broad impact, including providing health benefits for children

and their families, through active journeys, such as walking and cycling. It can also bring significant environmental improvements, through reduced levels of congestion and improvements to air quality to which children are particularly vulnerable.

The catchment primary school, known as Crawfords CEVC Primary School, sits on a small constrained site. The site is already well below Building Bulletin 103 space standards for schools. For a 105-place primary school (PAN 15) these guidelines suggest a minimum site size of 5,496 square metres, whereas the school actually sits on a site of only 1,496 square metres. To note that SCC has previously responded to the emerging Haughley Neighbourhood Plan saying that it would investigate increasing the primary school capacity but did highlight that further housing growth would most likely necessitate a new primary school. Considering the significant site constraints, it is not feasible to expand the primary school to increase the pupil admission number (PAN).

As the catchment primary school is not able to be expanded, the school capacity is forecast to be exceeded based on basic need and additional children arising from new development. This may also result in those children currently living in the catchment area being displaced by children arising from housing growth.

The catchment schools are Crawfords CEVC Primary School (forecast to be full and is not able to be expanded) and Stowupland High School. However, the nearest primary school to the proposed development is Elmswell Community Primary School (forecast to be full after an expansion project), so the next nearest primary school would be Woolpit Primary Academy (also forecast to be full, so a new primary school is to be delivered in Woolpit). At the secondary school level, the nearest school is Stowmarket High School, then Stowupland High School and Thurston Community College.

Previously, the County Council responded to Mid Suffolk by way of consultation letter dated 11 December 2017 to application reference DC/17/04113 concerning:

'outline planning application on land east of King George's Field Green Road for the erection of 98 dwellings (including 34 affordable homes), provision of a junior football pitch, areas of public open space and off-site highway improvements.'

The County Council highlighted the Mid Suffolk District Council Live Policies as of June 2016 including Proposal 25 which states:

2.9.20 Suffolk County Council is the Local Education Authority and has responsibility for the provision of schools and further education. There is a three-tier management of schools in Mid Suffolk, namely primary, middle and upper schools. The County Council continues to monitor population trends and to note where housing development is expected to take place in order to predict likely school rolls, looking up to 8 years ahead. The provision of a site for a new school at Stowmarket within the Strategic Development Area is considered in Section 2.10. Other sites are set out in Proposal 25.

Proposal 25: Sites for new primary schools have been identified at the following villages: land at Castle Rise, Haughley (1.5 hectares) (inset map 41A).

The County Council drew attention to the fact that part of the application under reference DC/17/04113 had previously been identified under Proposal 25 for education use. And went on to state that to grant planning permission for housing on land previously identified for education use, ahead of a strategic assessment of primary school requirements for the village, will result in a sub-optimal outcome – which would be contrary to the principles of delivering sustainable development as set out in the NPPF. The County Council identified the significant risk in granting planning permission for housing under reference DC/17/04113 on the only identified site for education use in the village ahead of the full consideration of other options. However, the District Council granted planning permission for the 98 dwellings by way of Decision Notice dated 31 May 2018.

The current Mid Suffolk 123 List, dated January 2016, includes the following as being capable of being funded by CIL rather than through planning obligations:

- Provision of additional pre-school places at existing establishments
- Provision of primary school places at existing schools
- Provision of secondary, sixth form and further education places

SCC anticipates the following **minimum** pupil yields from a development of 149 dwellings, namely:

- a) Primary school age range, 5-11: 37 pupils. Cost per place is £12,181 (2018/19 costs).
- b) Secondary school age range, 11-16: 26 pupils. Cost per place is £18,355 (2018/19 costs).
- c) Secondary school age range, 16+: 6 pupils. Costs per place is £19,907 (2018/19 costs).

Based on existing forecasts SCC will have no surplus places available at the catchment secondary schools. For secondary school provision a minimum CIL funding bid of £596,672 (2018/19) will be made.

As the catchment primary school is not able to be expanded, the school capacity is forecast to be exceeded based on basic need and additional children arising from new development. Putting to one side the isolated location of this proposed development, if planning permission was granted then primary-age pupils arising would need to be offered places at Woolpit (nearest location for the provision of primary school places), where the strategy is to deliver a new primary school. Proportionate section 106 developer funds will be required to pay for the new primary school land and construction costs, on the basis that the Mid Suffolk Regulation 123 List does not include funding for new primary schools.

The County Council will require proportionate developer contributions for the land and construction costs for a new primary school from this proposed development, which will need to be secured by way of a planning obligation. Proportionate developer contributions based on the 37 primary age pupils forecast to arise from the proposed development is calculated as follows:

- £6.9m construction cost (excluding land) for a 420 place (2 forms of entry) new primary school.
- £6.9m/420places = £16,429 per pupil place.

- From 149 dwellings it is forecast that 37 primary-age pupils will arise.
- Therefore, 37 pupils x £16,429 per place = £607,873 (2018/19 costs).

Assuming the cost of the site for the new primary school, based on a maximum cost of £100,000 per acre (£247,100 per hectare), is £ 741,316 for a 3-hectare site and equates to £ 1,765 per pupil place. For the proposed development, this equates to a proportionate land contribution of 37 places x £ 1,765 per place = £65,305.

Ideally, the District Council refuses planning permission for this application because of its isolated location and poor connectivity with social infrastructure. It would also be prudent to wait for a plan-led approach for Haughley with the identification of the necessary supporting infrastructure. In line with paragraph 38 of the NPPF, local planning authorities should approach decisions on proposed development in a positive and creative way in order to ensure that the proposed development will improve the economic, social and environmental conditions of the area – this proposed scheme will create adverse social harm.

However, if the District Council considers that planning permission should be granted for the outline application for up to 149 dwellings, this must be on the basis that s106 developer funding is secured by way of a planning obligation for the proportionate land and build costs of a new primary school and the costs of school transport. Contributions required are as follows:

- a) New primary school construction cost contribution of £607,873, increased by the BCIS.
- b) New primary school land acquisition contribution of £63,305, increased by the BCIS.
- c) 37 primary-age pupils are forecast to arise from the proposed development. Developer contributions are sought to fund school transport provision for a minimum of seven years for primary-age pupils. Annual school transport cost per pupil is £960. Therefore, contribution is £960 x 37 pupils x 7 years = £248,640, increased by the RPI.
- d) 26 secondary-age pupils are forecast to arise from the proposed development. Developer contributions are sought to fund school transport provision for a minimum of five years for secondary-age pupils. Annual school transport cost per pupil is £960. Therefore, contribution is £960 x 26 pupils x 5 years = £124,800, increased by the RPI.

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

I will be grateful if the above information can be provided to the decision-makers who will be considering the planning balance of the proposed development when determining the application.

Yours sincerely,

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Development Contributions Manager
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cc Sarah Hammond, Suffolk County Council
Robert Hobbs, BMSDC
Philip Isbell, BMSDC
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