

Your ref: IP/24/00172/OUTFL & DC/24/0771/OUT
Our ref: 60296 & 60297
Date: 23 April 2024
Enquiries to: Peter Freer
Tel: 01284 758475
Email: peter.freer@suffolk.gov.uk



By e-mail only: development.management@ipswich.gov.uk
planning@eastssuffolk.gov.uk

FAO Roz Claxton & Eleanor Attwood

Dear Roz & Eleanor,

Re: Land Between Humber Doucy Lane and Tuddenham Lane - developer contributions

I refer to the proposal: Hybrid Application - Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works.

The application covers two Local Planning Authority areas and East Suffolk Council is a CIL charging Authority, therefore some of the infrastructure identified below will fall to CIL rather than S106. This includes Libraries, Waste, Sixth Form expansion and Secondary new build. As it is not clear what proportion of dwellings will fall in the East Suffolk district a per dwelling cost has been provided to simply this for the decision taker.

This letter sets out the infrastructure requirements arising from the above identical applications lodged with both East Suffolk Council and Ipswich Borough Council. It is understood that Ipswich Borough are the lead authority determining the application.

The supporting Planning Statement refers to overall housing numbers of 690 dwellings, with a conservative figure of 660 maximum number of homes. The questioning of the Ipswich Local Plan policy figure of 449 dwellings, based on the 60% allocated for housing at 35 dwellings per hectare to produce a figure of 499 dwellings, needs to state whether this assessment has included open space and other land use requirements.

Summary of infrastructure requirements based on 660 dwellings set out below:

Service Requirement	Capital Contribution	Per dwelling cost
Early Years New (standalone) @ £36,050 per place	£1,982,750.00	£3,004.17
Early Years site – fully serviced freehold	£1	-
Primary School New @£28,760 per pupil place	£6,097,120.00	£9,238.06
Secondary School New @ £37,443 per place	£3,706,857.00	£5,616.45
Sixth Form expansion @ £29,096 per place	£989,264.00	£1,498.88
Household Waste @ £138 per dwelling	£91,080.00	£ 138.00
Libraries Improvements @ £216 per dwelling	£142,560.00	£ 216.00
SEND	TBC	TBC
Primary School Transport	TBC	TBC
Highways	TBC	TBC
Monitoring fee (per trigger point)	£476	£476

The county council and district/borough councils have a shared approach to calculating infrastructure needs, in the [Section 106 Developers Guide to Infrastructure Contributions in Suffolk](#).

The Suffolk Coastal Local Plan Review was adopted on 26 September 2020. Part of this site is included in the Suffolk Coastal Local Plan as SCLP12.24, Land at Humber Doucy Lane, Rushmere St Andrew. The policy includes;

- c) Provision of 0.1ha of land for an early years setting if needed within the part of the site in East Suffolk;
- e) Provision for sufficient primary school spaces.

The adopted Local Plan includes Appendix A - Delivery Framework which refers to the Early Years site requirement, and Appendix B – Infrastructure Delivery Framework which sets out the infrastructure requirements and funding sources. This includes the following in respect of this site allocation:

- Early years setting at Land at Humber Doucy Lane, Rushmere St Andrew (Policy SCLP12.24). Type of developer contribution; **S106**.
- Capacity for additional pupils at new Ipswich Garden Suburb Primary (Policies SCLP12.66, SCLP12.67, SCLP12.24). Type of developer contribution; **S106**.
- Capacity for additional pupils at Ipswich Garden Suburb Secondary School. Type of developer contribution; **CIL**.

The Ipswich Borough Council Local Plan was adopted on 23 March 2022. The Core Strategy includes the following objectives and policies relevant to providing infrastructure:

- Objective 10 seeks to retain, improve and provide high quality and sustainable

education facilities, health facilities, and sports and cultural facilities and other key elements of community infrastructure in locations accessible by sustainable means and in time to meet local demand.

- Policy CS17 which requires all developments to meet site related infrastructure needs and, where the provision of new or the improvement of existing infrastructure is needed, the development is expected to mitigate its impacts.

ISPA Policy 4.1 allocated part of this site. This policy includes:

i) Primary school places and an early years setting to meet the need created by the development;

vii) The development will be triggered by the ability to provide the necessary primary school capacity on the Red House element of Ipswich Garden Suburb or an agreement between the landowner and Suffolk County Council, as the Education Authority, to provide a primary school on the Humber Doucy Lane development;

Overall the Ipswich Borough Council Local Plan Review policy ISPA4.1 allocates 449 dwellings and Suffolk Coastal Local Plan Policy SCLP12.24 allocates approximately 150 dwellings.

Community Infrastructure Levy and S106

East Suffolk are a CIL charging authority and have published an [Infrastructure Funding Statement](#) for the which includes an 'infrastructure list' starting on page 57, setting out how required infrastructure should be funded by either CIL or S106. East Suffolk Council adopted a revised CIL Charging Schedule and charges CIL on planning permissions granted after 1 August 2023.

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 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) [December 2023] paragraph 57 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 details of the impact on local infrastructure serving the development is set out below and will form the basis of developer contributions funding:

1. Education. Paragraph 99 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 110 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 Department for Education (DfE) publication 'Securing developer contributions for education' (August 2023), which should be read in conjunction with the Planning Practice Guidance (PPG) advice on planning obligations [revised September 2019]. Paragraph 41 of the DfE guidance states, "We advise local authorities with education responsibilities to work jointly with relevant local planning authorities as plans are prepared and planning applications determined, to ensure that all education needs are properly addressed, including temporary education needs where relevant, such as temporary school provision and any associated school transport costs before a permanent new school opens within a development site."

SCC's pupil yields are taken from the 'headline' data for Suffolk provided by the Department for Education [Pupil Yield Data Dashboard](#). These are per dwelling (2 bedroom+); 0.32 Primary, 0.15 Secondary and 0.055 for Sixth Form.

In paragraph 32 of the DfE guidance 'Securing developer contributions for education' it says, "We advise that you base the assumed cost of mainstream school places on the relevant average regional costs published in the DfE school places scorecard. This allows you to differentiate between the average per pupil costs of a new school, permanent expansion or temporary expansion, ensuring developer contributions are fairly and reasonably related in scale and kind to the development. You should adjust the regional average to account for inflation since the latest scorecard base date". Paragraph 35 of the guidance states; "Where you have a reasonable expectation of higher costs based on local planning policy requirements, known site abnormalities or recent trends of higher delivery costs for projects in your area, these can be used in preference to the regional average in the school places scorecard".

SCC does have evidence of higher delivery costs for projects in Suffolk

and there are set out below:

- a) Early Years age range 2-4: Cost per place is £36,050 (2024 Suffolk costs for new build).

To note that the government announced in the March 2023 budget that childcare provision is to be extended for children from age nine months up to the age of four, which will roll out from April 2024.

- b) Primary school age range, 5-11: Cost per place is £28,760 (2024 Suffolk cost for new build 420 place school).
- c) Secondary school age range, 11-16: Cost per place is £37,443 (2024 Suffolk cost for new build Secondary School).
- d) Secondary school age range, 16-18: Cost per place is £29,096 (DfE school places scorecard (June 2023) cost for expansion).

SCC would anticipate the following **minimum** pupil yields from this development:

School level	Minimum pupil yield:	Required:	Cost per place £:
Primary school age range, 5-11:	212	212	28,760
Secondary school age range, 11-16:	99	99	37,443
Secondary school age range, 16+:	34	34	29,096

Pupil places contributions total:	£10,793,241.00
-----------------------------------	-----------------------

The site is within the catchment of Rushmere Hall Primary School and Northgate High School (11-18).

Primary School build costs

The catchment school is forecast to be at capacity and cannot be expanded any further.

A proportionate developer contribution, based on the primary age pupils

forecast to arise from the proposed development is calculated above and set out in the table at the start of this letter.

The allocation is nearest to the Red House Neighbourhood of Ipswich Garden Suburb but there should be flexibility with either of the three new primary schools serving Ipswich Garden Suburb to provide places for this proposal. This would be in the form of new primary school contributions secured by S106. The new Henley Gate primary school is expected to be open in September 2026 which is the first of the three primary schools serving the Ipswich Garden Suburb. The new Primary Schools serving the Red House Neighbourhood and Fonnereau Neighbourhood currently have no dates for delivery at this moment in time but will be delivered linked to dwelling build out rates.

Safe Routes to Schools

School infrastructure delivery on the IGS will obviously be phased and depending on when this scheme is built out will inform SCC of the most suitable primary school to attend from a pupil place planning perspective.

Depending on when this site comes forward an assessment of safe routes to school will be required and it may be that the distance to the nearest primary school with places will be over 2 miles, and primary school transport costs may be necessary. The SCC transport policy states that transport will be provided for children up to 8 years old where the statutory walking distance is over 2 miles, and for children 8 and over the statutory walking distance is 3 miles.

An important aspect of progressing this scheme will be ensuring that there are safe walking routes to local schools (including those planned on IGS) and we would expect the scheme promoters to address this important issue. Hopefully, this will result in a situation where all pupils can walk to school and no contribution to school transport will arise. If it is determined a requirement it will be based on a calculation of £1,405 x number of pupils x 7 years.

Secondary School

At the secondary school level the school is forecast to exceed 95% capacity during the forecast period. The proposed strategy for mitigating this growth is via provision of a new secondary school within the Red House Neighbourhood of the Ipswich Garden Suburb. On this basis, a capital contribution is set out in the above table.

Sixth Form

The pupils arising from this development would necessitate the provision of additional sixth form places. The strategy for sixth form provision is to provide places at Northgate High School Sixth Form which is programmed to be

expanded.

SEND

The SEND developer contributions requirement is being reviewed and will be updated separately.

- 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'

The Childcare Act 2006 places a range of duties on local authorities regarding the provision of sufficient, sustainable and flexible childcare that is responsive to parents' needs. Local authorities are required to take a lead role in facilitating the childcare market within the broader framework of shaping children's services in partnership with the private, voluntary and independent sector. Section 7 of the Act sets out a duty to secure funded early years provision of the equivalent of 15 hours funded education per week for 38 weeks of the year for children from the term after their third birthday until they are of compulsory school age. The Education Act 2011 places a statutory duty on local authorities to ensure the provision of early education for every disadvantaged 2-year-old the equivalent of 15 hours funded education per week for 38 weeks. The Childcare Act 2016 places a duty on local authorities to secure the equivalent of 30 hours funded childcare for 38 weeks of the year for qualifying children from September 2017 – this entitlement only applies to 3 and 4 years old of working parents.

To note that the government announced in the March 2023 budget that childcare provision is to be extended for children from age nine months up to the age of four. This is proposed to be rolled out from April 2024.

The published guidance from the DfE in paragraph 36: "Developer contributions for early years provision will often be used to fund places at existing or new school sites, incorporated within primary schools. Therefore, we recommend that the per pupil cost of early years provision is assumed to be the same as for a primary school, unless you have alternative local/regional cost data for new or expanded standalone settings (either maintained or PVI sector) that more accurately reflect the type of new early years provision required in your area".

Paragraph 3.22 of the Planning Statement confirms the provision of an 'Early Years Nursery' on a site of 0.22ha. Paragraph 3.23 discusses a second element of non-residential built floorspace, and paragraph 3.25 states the two elements are purposely co-located and; "set in the centre of the site next to the central open space, to form a clear 'heart' to the development, to provide a focal point for community activity, and to maximise the opportunity for walking and cycling to local facilities for residents". Whilst SCC support this co-location, it's

important that the Early Years setting is standalone and it is not considered shared use.

For standalone Early Years settings which are not part of new primary school sites SCC uses a contribution of £36,050 per place (60 place setting cost calculated from our recently completed cost review).

From this development proposal SCC would anticipate the following pre-school places arising:

	Minimum number of eligible children:	Required:	Cost per place £ (2024):
Pre-School age range, 2-4:	55	55	36,050

Required pre-school contributions:	£1,982,750.00
---	----------------------

This proposed development is in the Carlford & Fynn Valley. When taking into account approved development proposals in the ward a deficit of places is forecast, and the development based on existing calculations generates 55 FTE places. The Government's extended entitlement is being rolled out in phases from April 2024 and the take up of the additional hours is likely to require more FTE places and larger site areas. This calculation is being reviewed.

Pre-school land requirements

- The new setting will require a fully serviced site.
- All BNG requirements to be addressed by the wider site requirements.
- Unencumbered freehold to be transferred to SCC for £1.
- SCC would need to be involved with identifying the location of the setting and would expect the scheme promoter to pay for a feasibility study.

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 key document is the 'Quality in Play' document fifth edition published in 2016 by Play England.

4. Transport issues. Refer to the NPPF 'Section 9 Promoting sustainable transport'. A comprehensive assessment of highways and transport issues will be required as part of a planning application. This will include travel plan, pedestrian & 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 as appropriate, and infrastructure delivered to adoptable standards via Section 38 and Section 278. Suffolk County Council FAO Luke Cantwell-Forbes will coordinate this.

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 (updated October 2023¹).

5. Libraries. Refer to the NPPF Section 8: ‘Promoting healthy and safe communities’.

The Arts Council England in partnership with The National Archives has produced Guidance on seeking and securing developer contributions for library and archive provision in England (September 2023). This summarises the previous Museums Libraries and Archives Council (MLA) publications: Public Libraries, Archives and New Development: A Standard Charge Approach [May 2010]; and Museums, libraries, archives, arts provisions and new development: Progress report on the adoption of standard charge approaches [June 2010]. The MLA suggests using 30 sqm of library floorspace per 1,000 population. The MLA guidance recognises that contributions may not always be used to construct new library floor space but might be used to upgrade or refurbish existing provision. For example, it is suggested a contribution based on the MLA benchmark figure could be used for IT provision, the reorganisation of library space within buildings and other refurbishments to increase public access.

The libraries and archive infrastructure provision topic paper sets out the detailed approach to how contributions are calculated. A contribution of £216 per dwelling is sought, which will be spent on enhancing provision at the nearest library. 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 (3 x £3,000) = £90,000 per 1,000 people or £90 per person for library space. Assumes average of 2.4 persons per dwelling. This gives a cost of £216 / dwelling for the support of improving services and outreach at Ipswich Library.

Libraries contribution:	£142,560.00
-------------------------	--------------------

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.

Paragraph 8 of the National Planning Policy for Waste states that when

¹ Suffolk Guidance for Parking (October 2023) <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance>

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.

A contribution of £138 per household is required to improve/relocate the Recycling Centre facilities serving Ipswich and surrounding areas. A project has recently been delivered at Foxhall Recycling Centre which involved considerable forward funding including £6.8 million SCC capital funding as well as £958,914 CIL funding from East Suffolk Council. An additional project is to relocate the existing [Portman Walk Recycling Centre](#). The East Suffolk element can be deducted as there was an element of forward funding in the CIL bid for the Foxhall project.

Waste contribution:	£91,080.00
---------------------	-------------------

- 7. Suffolk Fire and Rescue Service** Any fire hydrant issues will need to be covered by appropriate planning conditions. SCC strongly recommends 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 SCC to make final consultations at the planning stage.
- 8. Supported Housing.** 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 62 to 65 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 addition, we would expect a proportion of the housing and/or land use to be allocated for housing with care for older people e.g. Care Home and/or specialised housing needs, based on further discussion with the LPAs housing team to identify local housing needs.

- 9. Sustainable Drainage Systems.** Section 14 of the NPPF seeks to meet the challenges of climate change, flooding and coastal change. Suffolk County Council is the lead local flood authority. Paragraphs 159 – 169 refer to planning and flood risk and paragraph 169 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.'

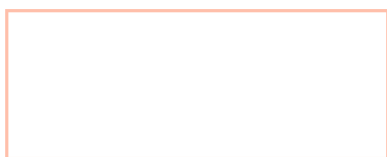
A consultation response will be coordinated by Suffolk County Council Floods Team.

10. Legal costs. SCC will require an undertaking for the reimbursement of its own legal costs associated with work on a S106A, whether or not the matter proceeds to completion.

11. Monitoring fee. The CIL Regs allow for charging of monitoring fees. In this respect the County Council charges **£476** for each trigger point in a planning obligation, payable upon completion of the deed.

12. Time Limit. The above information is time-limited for 6 months only from the date of this letter and will be reassessed for reconsultations.

Yours sincerely,



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

cc SCC, Luke Cantwell Forbes
SCC, Sarah Finn
SCC, Kelly Smith
SCC, Penny Bates
SCC, Floods Team
SCC, Archaeology
SCC, Suffolk Fire and Rescue
ESC, CIL Team