

## **Forest Heath Local Plan – Examination of the Site Allocations Local Plan**

### **Suffolk County Council Representation on Matter 4 – The spatial distribution of housing in the Market Towns: Brandon, Mildenhall and Newmarket**

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#### **1. Introduction**

1.1 This statement relates to Questions 4.3, 4.4, 4.13 and 4.16 – i.e. those questions related to County Council infrastructure.

#### **2. Question 4.3**

*Para 3.11 – Link between the A11 and A14 at junction 38 – which allocated sites is this referring to in terms of securing significant infrastructure before growth can be accommodated? – it is suggested that the text needs to be more specific in this regard. How has this matter been addressed in relation to the site allocations proposed?*

2.1 The transport evidence underpinning these site allocations has not identified a need for a link between the A11 and A14 in order to deliver this Plan. The County Council does not envisage any sites contributing to a link road at this location.

2.2 Paragraph 3.11 also makes reference to the A11 Fiveways junction. Improvements will be required at this location. Funding has been secured to enable Highways England to provide signalisation of this junction. A longer term grade separation scheme is being investigated.

#### **3. Question 4.4**

*In terms of Brandon, there are two allocated sites totalling 33 units (p24) yet allocation refers to 71 dwellings – clarification required. Proposed allocation SA2(B) – road unadopted – under what ownership is the road? What highways advice has been provided to indicate 10 units would be possible here?*

3.1 The County Council has previously advised that development of 10 dwellings at this location is possible, provided that sufficient provision is made for pedestrians to access wider networks and that construction management measures are provided to protect the users of Gas House Drove and its surface.

- 3.2 The District Council is considering an application for planning permission on this site and will be highlighting the Highway Authority's advice in its response on this question.
- 3.3 At the current time, it appears that suitable measures could be provided, enabling delivery of the site. The statement, in Policy SA2, to the effect that the access to SA2 restricts the number of dwellings that can be provided on site (b), is appropriate.

#### 4. Question 4.13

*Proposed allocation SA5 - SCC advised that the development of this site is likely to contribute to the cost of the new school – what phasing structure is in place to ensure this takes place?*

- 4.1 Current forecasts suggest that the sites allocated by policy SA5 will be required to contribute to the provision of the new primary school to come forward within allocation SA4. Additional policy measures to manage phasing requirements are not required within the SALP.
- 4.2 It is not appropriate to open primary schools in advance of sufficient demand for places, as places would be taken up from elsewhere, undermining existing schools. Therefore, temporary classrooms may be required as a short term measure to ensure that places are provided in advance of the new school opening.
- 4.3 Consideration of the need for temporary classrooms would be considered closer to the period of need, based on pupil forecasting data and in discussion with local schools.
- 4.4 Policy CS13 of the Forest Heath Core Strategy (**Ref: B57**) includes the following statement: *'The release of land for development will be dependent on there being sufficient capacity in the existing local infrastructure to meet the additional requirements arising from new development. Suitable arrangements will be put in place to improve infrastructure, services, and community facilities, where necessary, to mitigate the impact of development.'*

*New development will be required to demonstrate that it will not harm the District's ability to improve the educational attainment [...] of Forest Heath communities.'*

- 4.5 This, allied to the process set out in the Section 106 Developers Guide (**Ref: B64 and D37**) is sufficient to ensure that the sites in SA5 make appropriate provision. Therefore, a phasing requirement is not required.

- 4.6 If the new primary school is required earlier than currently envisaged, the delivery is made more certain by the fact that the land is identified for the new school is already in the County Council's ownership.

## 5. Question 4.16

*Site SA4 – what consideration has been given to the likely delivery of this site? What infrastructure is necessary to secure the delivery of the site?*

- 5.1 The County Council's written statements have indicated the infrastructure which this site is likely to contribute to. The following paragraphs may be a useful summary of County Council infrastructure requirements, which are based on the approach set out in the Section 106 Developers Guide (**Ref: B64**).
- 5.2 In respect of transport, a paper by consultants AECOM is appended to this statement. Whilst the transport assessment, to be carried out as the proposal moves towards a planning application, will identify the necessary transport measures to be provided by this site – such as detailed arrangements for walking, cycling, and connectivity to the existing Rights of Way Network – the AECOM paper identifies what is already understood to be needed. This is based upon the cumulative impact studies carried out to assess the implications of the plan, plus the transport assessment prepared as part of the application for the Mildenhall Hub.
- 5.3 Policy SA4 references the need to connect into public access routes in the vicinity of the development. The use of the rights of way network is vital to promote walking and cycling, not only as a more sustainable mode of travel but as a way to improve health. In 2014, the County Council completed substantial improvements to encourage people to walk and cycle between West Row and Mildenhall. The delivery of the site will need to connect to and further enhance facilities.
- 5.4 Based on 130 eligible children aged 2 – 5 arising, this site will need to provide at least one early education setting at the primary school. A second may be required within the local centre, but this will be considered against capacity at the setting coming forward at the Mildenhall Hub. This setting, or an expansion of this setting, may be sufficient to mitigate the impact of this site and the others coming forward in Mildenhall.
- 5.5 Based on 325 primary school aged children arising, this site will provide land for a new primary school and a proportionate contribution towards construction. Contributions from other sites in Mildenhall are likely to also contribute to this school.

- 5.6 Based on 286 additional pupils aged 11 – 18 arising, this site will also be expected to make a contribution towards additional secondary school capacity. Whilst it would clearly be expected that pupils from this site will walk or cycle to the relocated Mildenhall Academy, contributions may be spent elsewhere on a new Secondary School in order to create the capacity at Mildenhall. As set out in the County Council's written statement on education infrastructure for the Single Issue Review, an approach has been developed to ensure that a decision on future secondary school provision is made alongside the development of the Local Plan, in order that places are available to meet demands arising from development.
- 5.7 The site will be served by at Mildenhall Library, which will be relocated to the Mildenhall Hub. Contributions may not be required, but this will be reviewed as the site comes forward.
- 5.8 The site is unlikely to be required to contribute to additional household waste site capacity at the Mildenhall facility (just off the A1065). However, the site will need to ensure that proper provision is made for collecting domestic waste, and a 'bring site' recycling facility at the Local Centre is likely to be required, to encourage recycling and reduce demand on other facilities.

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## 1. Introduction

- 1.1 AECOM were appointed by Forest Heath District Council (FHDC) to undertake studies providing a cumulative traffic analysis of the proposed developments identified for allocation in the Site Allocations Plan (SALP). Subsequent to this FHDC and Suffolk County Council (SCC) have requested additional clarification regarding the phasing of mitigation identified for Mildenhall Town.
- 1.2 The Cumulative Traffic Impact Study for the FHDC Site Allocation Plan identifies the need for highway mitigation at Mildenhall to support proposed site allocations.
- 1.3 A detailed planning application for Mildenhall Hub has come forward, which involves redevelopment of a major allocated site in Mildenhall. This has led to further detailed assessment of the highway network in Mildenhall, identifying highway mitigation requirements.
- 1.4 There are proposals for the redevelopment of Mildenhall RAF, which are expected to come forward after the timeframe for the current proposed Local Plan. A Developers Brief exists for this which highlights the need for highway mitigation.
- 1.5 As a result there is a need for clarity regarding mitigation needs at Mildenhall, when they would be required and how they relate to the current proposed Local Plan Allocations. The aim of this document is to set out the anticipated phasing of highway mitigation in Mildenhall to support planned development.

Table 1 below summarises the anticipated phasing of mitigation in line with development over the horizon of the Local Plan.

**Table 1 Mildenhall – Highway Mitigation Phasing**

Development Phase	Expected Highway Mitigation Needs	Anticipated timeframes	Delivery Mechanism
Mildenhall Hub	<p>Encouraging use of more sustainable modes of transport through promotion of initiatives set out in the Travel Plan.</p> <p>Localised traffic management measures to optimize efficiency of A1101 North Terrace / A1101 Kingsway / B1102 High Street three-arm roundabout with Queensway junction</p>	2019+	Development Funded through S27/S106
Remaining Proposed Local Plan Allocations to 2031	<p>Traffic management measures, aimed at reducing traffic through Queensway, including banned turns, junction improvements and one-way traffic regulations, promotion of alternative routes.</p> <p>Separate to the localised improvements identified for Mildenhall is the strategic upgrade of the A11 Fiveways (A11/A1101 Mildenhall Road / A1065 Brandon Rd / A1011 Bury Rd) five armed roundabout. This junction has been identified for upgrade by Highways England and funding has been secured for signalisation of this junction. A longer term grade separation scheme is being investigated, for which funding has not been secured.</p>	2019-2031	<p>Development Funded through S27/S106 &amp; LTP funding</p> <p>Government Funding</p>
Growth Post Local Plan	To accommodate growth beyond that set out in the Local Plan, including potential redevelopment of RAF Mildenhall, significant mitigation such as a relief road.	2031+	Development contributions & government funding