

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

## Suffolk County Council Representation on Matter 2 – Basis of the Plan

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### 1. Introduction

- 1.1 This representation concerns Suffolk County Council's comments on infrastructure delivery as raised under Matter 2. This statement may also prove useful to the examination as it considers other Matters, focussing on the specific settlements.
- 1.2 Suffolk County Council is a key partner in the preparation and delivery of this Plan, being responsible for service areas including transport, education, libraries and waste disposal. Relevant information on County Council infrastructure can be found in other written representations and the Infrastructure Plan (**Ref: C19**).
- 1.3 The County and District Councils have a strong track record in securing and delivering the infrastructure necessary for delivering growth, with the process managed by the Section 106 Developers Guide (**Ref: B64 and D36 – D46**).

### 2. Question 2.4

*How have the transportation and infrastructure requirements of the site allocations been taken into account? Has it been demonstrated that there is a reasonable prospect that planned infrastructure will be delivered within the timeframe envisaged? Will this delivery of infrastructure be sufficient to support the anticipated rate of development?*

- 2.1 The key infrastructure requirements for this scale and distribution of growth are set out in Forest Heath's Infrastructure Plan (**Ref: B29**). This section summarises and provides further detail on transport and education requirements.

#### Transportation Requirements

- 2.2 The AECOM studies published in August 2016 (**Ref: B17**) and October 2016 (**Ref: B18**) identify the locations where mitigation is likely to be required as a result of the cumulative impacts of development and background traffic growth during the plan period. These studies did not identify significant constraints beyond which would be expected to be required and managed through the development management process. Site specific mitigation measures are also

expected to be required, to be determined through the transport assessment process.

- 2.3 No obstacles have been identified to delivering the strategic mitigation referred to in the AECOM studies. Sites will be expected to make appropriate contributions to new infrastructure and other funding sources are available, such as County Council Local Transport Plan funds, Highways England Regional Investment Strategy funding and other Government sources.
- 2.4 A policy framework for securing necessary transport infrastructure is established by the National Planning Policy Framework, Planning Practice Guidance and existing local policy. The extant Core Strategy (**Ref: B57**) requires that development provides for relevant infrastructure (policy CS13). The Joint Development Management Policies document (**Ref: B2**) includes Policy DM45 which sets a requirement relating to transport infrastructure, ensuring that necessary contributions can be secured.
- 2.5 National policy sets out a process for considering the cumulative impacts of development, including growth proposed through the Local Plan, through the development management process.
- 2.6 In the section on the scope of the transport assessments, the Planning Practice Guidance (in paragraph 42-014-20140306) refers to the need for consideration of the cumulative impact of growth, and specifies that this refers to sites permitted or allocated and likely to come forward within three years. It further states, within the same paragraph that:

*'It is important to give appropriate consideration to the cumulative impacts arising from other committed development (ie development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years). At the decision-taking stage this may require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval.'*

- 2.7 The evidence shows that there are locations where consideration will need to be given to the cumulative impacts of growth, where sections of the transport network may be impacted by development and subsequent Local Plan allocations, yet to be permitted. The County Council has agreed an additional modification with the District Council, inserting supporting text which draws attention to the requirement in national policy. This will help developers to understand the requirements placed on them as they prepare planning applications and will guide the planning authority and highway authority to ensure that cumulative impacts are assessed and mitigated using existing policies.

## Education Requirements

2.8 Education infrastructure requirements – including early education – have been set out in a previous written statement to the Single Issue Review Examination. As with transport requirements, Policy CS13 of the Core Strategy sets a local policy requirement to help implement the requirements of Paragraph 72 of the NPPF. The Section 106 Developers Guide to Infrastructure Contributions in Suffolk (**Ref: B64**) sets out adopted local requirements for calculating and securing developer contributions towards education infrastructure.

2.9 The school forecasts and accompanying narrative set out for the Single Issue Review examination show that an estimate has been made as to the impact of additional pupils, with ‘tipping points’ identified (when additional school places are required). These can be estimated with reasonable certainty within the next five years, but estimates become less certain beyond the initial five year period (particularly for primary schools). Forecasts are updated each year, therefore requirements arising beyond the next five years can be estimated with reasonable certainty.

<b>Settlement</b>	<b>Early Education</b>	<b>Primary Education</b>	<b>Secondary Education</b>
Brandon	Expand existing local settings (if required)	Additional places are not expected to be required.	Additional places likely to be required – contributions to be sought.*
Mildenhall	New setting at the new primary school. A second additional setting, if required, to be provided within the local centre at SA4.	New primary school at SA4. Expected to be required to open in around 2022/23. Contributions expected to be sought from all sites.	Additional places likely to be required from 2022 – contributions to be sought.
Newmarket	Consider establishing a new setting – either a standalone setting on County Council owned land or alongside a new primary school.	Establish a new primary school in the mid – 2020s. Sites expected to make a contribution. Based on the submitted local plan, suitably located and available land is already in the County Council’s ownership.	Additional places likely to be required in around 2022/23 – contributions likely to be sought.
Lakenheath	New setting being established at the new primary school. Additional	New primary school being established at SA8(b). Target date for opening is	See Mildenhall.

	development may contribute to this setting or expanding other existing settings.	September 2019 and the site is large enough to meet demands arising from planned growth.	
Red Lodge	New setting being established at the new primary school. Potential need for an additional (i.e. second) new setting. Different locations in Red Lodge will be considered for establishing this setting (e.g. alongside other community/retail provision or potentially even within employment land). Dependent on existing provision and demand at the time that development comes forward, it may be preferable to expand existing settings.	New primary school (The Pines) being established at SA10(a). Target date for opening is September 2018 and the site is large enough to meet demands arising from planned growth.	See Mildenhall.
Beck Row	The County Council will seek to expand existing settings in the locality to meet demands arising from growth.	A project is being delivered at Beck Row primary school to provide sufficient capacity to meet demands from planned growth. This will be formally completed by September 2018.	See Mildenhall.
Exning	The County Council will seek to expand existing settings in the locality to meet demands arising from growth.	The school has recently been expanded and proposals drawn up with the school to enable expansion, sufficient for the growth proposed in the Plan. The timing of the delivery of this expansion will be	See Newmarket.

		based on pupil place needs which themselves will be influenced by the rate of housing delivery.	
Kentford	The County Council will seek to expand existing settings in the locality to meet demands arising from growth.	Land has been identified in the plan (Policy SA15) to enable the expansion of Moulton Primary School and contributions have been secured from the development permitted. The timing of the expansion will be based on forecasts of need for pupil places.	See Newmarket.
West Row	The County Council will seek to expand existing settings in the locality to meet demands arising from growth.	Land has been identified in the plan (Policy SA14) to enable the expansion of the school. A phased expansion of the school is planned, to meet demand arising from growth, based on when demands arise.	See Mildenhall.

\*Based on the size of the site, and Government guidelines on school site size requirements, it appears that IES Breckland, could expand to meet demand up to 2022. Future land requirements will be assessed through the preparation of the next local plan, alongside consideration of requirements arising from the Mildenhall catchment and from growth and infrastructure needs arising from Norfolk.

## Appendix 1 – School Forecasts and Calculations (Primary)

The following tables are based on the most recent forecasts of demand for places at primary school (January 2017). The pupils emanating from developments permitted before January 2017 are included within the pupil roll forecasts and excluded from the cumulative additional dwellings, in order to avoid double counting. Given that a large number of sites have been permitted and accounted for in forecasts, this means that ‘additional’ pupils are often not expected early in the time period covered by these tables.

Education provision in an area should not operate on the assumption that all capacity is available to be used. There needs to be a degree of surplus to facilitate parental preference and for contingency planning. Suffolk County Council uses a five per cent buffer – or 95% capacity – for school place planning. This is at the lower end of the 5-10% range identified by the Audit Commission in 1996 and 2002 and, as noted by the National Audit Office, the range used by the Department for Education. Therefore these tables reflect two capacities of schools – the ‘absolute’ capacities and relative capacities with a 5% buffer applied.

### 1. Brandon

Projects to expand both Brandon primary schools are due to complete for September 2017. Based on Forest Heath’s estimated housing trajectory, these pupils are not expected to enter Brandon’s primary schools until after the forecast period, however the data below shows that, with the additional places available from September 2017, current forecasts suggest that places should be available to accept the 8 additional primary school aged children without additional capacity being required.

School Name	Cap	Total Rolls (inc. permitted housing)					Estimated Effect by 2031
		2017	2018	2019	2020	2021	
Forest Academy	420	357	363	362	363	367	
Glade Primary School	420	276	298	323	353	353	
Total Places/Pupil Roll:	840	633	661	685	716	720	
Capacity minus 5% buffer	798						
Available Capacity (Absolute)		207	179	155	124	120	
Available Capacity (With Buffer)		165	137	113	82	78	
Cumulative Additional Dwellings (from trajectory)		0	0	0	0	0	33
Cumulative Additional Children		0	0	0	0	0	8
Effect of additional children from trajectory on absolute capacity:		207	179	155	124	120	112
Effect of additional children from trajectory on capacity, with buffer applied:		165	137	113	82	78	70

Figures may not sum due to rounding.

## 2. Mildenhall

At Mildenhall, a new primary school will be required as part of the strategic allocation to the west of the town. Land will be secured through a policy requirement in the Site Allocations Plan (policy SA4(a)). The timing of the delivery of this school will be based upon the rate of delivery of new homes. In the short term, the capacity of Great Heath primary school will be permanently expanded from September 2017, and this will provide sufficient capacity for latent growth.

		Total rolls (inc. permitted housing)					Estimated Effect by 2031
School Name	Cap	2017	2018	2019	2020	2021	
Great Heath Academy	630	490	536	576	598	602	
St Mary's Church of England Academy	420	413	414	415	398	391	
Total Places/Pupil Roll:	1050	903	950	991	996	993	
Capacity minus 5% buffer	998						
Available Capacity (Absolute)		147	100	59	54	57	
Available Capacity (With Buffer)		95	48	7	2	5	
Cumulative Additional Dwellings (from trajectory)		0	18	48	95	240	1484
Cumulative Additional Children		0	5	12	24	60	371
Effect of additional children from allocations on absolute capacity:		147	96	47	30	-3	-314
Effect of additional children from allocations on capacity, with buffer applied:		95	43	-6	-22	-56	-367

Figures may not sum due to rounding.

It is envisaged that, depending on forecasts at the time, the new primary school will be required in around 2022/23. In the interim, temporary provision may be required to support the small number of additional places required.

### 3. Newmarket

At Newmarket, it is envisaged that a new primary school will be required in the mid-2020s, with precise timing dependent on the rate of delivery of new homes and changes in background population change. The County Council has sufficient land in its ownership in the town to deliver a school in a suitable location for the distribution of housing proposed in the Local Plan.

Whilst the deficit of places at the end of the plan period is estimated to be low, given difficulties with expanding existing primary schools, establishing a new school appears to be the best strategy for managing growth in the long term.

		Total rolls (inc. permitted housing)					Estimated effect by 2031
School Name	Cap	2017	2018	2019	2020	2021	
All Saints CEVAP School, Newmarket	210	202	206	206	215	217	
Houldsworth Valley Primary Academy	420	270	285	310	326	332	
Laureate Community Academy	210	243	235	221	225	227	
Paddocks Primary School	210	204	206	210	213	213	
Total Places/Pupil Roll:	1050	919	932	947	979	989	
Capacity minus 5% buffer	998						
Available Capacity (Absolute)		131	118	103	71	61	
Available Capacity (With Buffer)		79	66	51	19	9	
Cumulative Additional Dwellings (from trajectory)		0	0	40	80	102	254
Cumulative Additional Children		0	0	10	20	26	64
Effect of additional children from trajectory on absolute capacity:		131	118	93	51	36	-3
Effect of additional children from trajectory on capacity, with buffer applied:		79	66	41	-2	-17	-55

Figures may not sum due to rounding.



#### 4. Lakenheath

A new primary school will be required. Land has been identified in the Site Allocations document (Policy SA8(b)), the District has a resolution to grant an outline planning permission for the school and land has been secured through a Section 106 agreement. The target date for opening this new school is September 2019. The school will open with 210 places but the site is large enough to enable expansion of the school to provide 630 places in the longer term, if needed.

The new primary school will enable this growth to be mitigated. In the interim, temporary places may be required at the existing primary school.

School Name	Cap	Total rolls (inc. permitted housing)					Estimated effect by 2031
		2017	2018	2019	2020	2021	
Total Places/Pupil Roll - Lakenheath CP School:	315	305	324	323	319	322	
Capacity minus 5% buffer	299						
Available Capacity (Absolute)		10	-9	-8	-4	-7	
Available Capacity (With Buffer)		-6	-25	-24	-20	-23	
Cumulative Additional Dwellings (from trajectory)		0	0	0	62	219	828
Cumulative Additional Children		0	0	0	16	55	207
Effect of additional children from allocations on absolute capacity:		10	-9	-8	-20	-62	-214
Effect of additional children from allocations on capacity, with buffer applied:		-6	-25	-24	-35	-78	-230

Figures may not sum due to rounding.

## 5. Red Lodge

At Red Lodge, a new primary school will be required. Land has been identified in the Site Allocations document, a planning permission is in place and the land has been secured. The County Council has started work on site and is targeting September 2018 to open a 210-place school, dealing with the deficit identified from 2019. An academy provider has been appointed and the new school has been named 'The Pines'. The site is large enough that the school could be expanded to 420 places in the longer term, which is sufficient to mitigate the total level of growth proposed in this Plan.

School Name	Cap	Total rolls (inc. permitted housing)					Estimated effect by 2031
		2017	2018	2019	2020	2021	
Total Places/Pupil Roll - St Christopher's CEVCP School:	420	328	367	405	456	481	
Capacity minus 5% buffer	399						
Available Capacity (Absolute)		92	53	15	-36	-61	
Available Capacity (With Buffer)		71	32	-6	-57	-82	
Cumulative Additional Dwellings (from allocations)		0	62	144	329	500	1147
Cumulative Additional Children		0	16	36	82	125	287
Effect of additional children from allocations on absolute capacity:		92	38	-21	-118	-186	-348
Effect of additional children from allocations on capacity, with buffer applied:		71	17	-42	-139	-207	-369

Figures may not sum due to rounding.

## 6. Beck Row

At Beck Row, the County Council intends to expand the existing school on its current site in order to accommodate the children arising in the local area. A project is being developed to provide another 105 places at the school from September 2018, taking the school to a total capacity of 315 places.

The County Council forecasts include the demand from pupils living on the US air bases, these are factored in to the primary forecasts. However our experience shows that there is a tendency for US pupils to only attend UK schools up to Key Stage 1. This has not been factored in to this forecast, hence the expansion to 315 places is considered sufficient to mitigate the impacts of housing growth and population growth.

School Name	Cap	Total rolls (inc. permitted housing)					Estimated effect by 2031
		2017	2018	2019	2020	2021	
Total Places/Pupil Roll - Beck Row School:	210	196	254	302	314	331	
Capacity minus 5% buffer	200						
Available Capacity (Absolute)		14	-44	-92	-104	-121	
Available Capacity (With Buffer)		4	-55	-103	-115	-132	
Cumulative Additional Dwellings (from allocations)		0	0	0	24	44	66
Cumulative Additional Children		0	0	0	6	11	17
Effect of additional children from allocations on absolute capacity:		14	-44	-92	-110	-132	-149
Effect of additional children from allocations on capacity, with buffer applied:		4	-55	-103	-121	-143	-159

Figures may not sum due to rounding.

## 7. Exning

At Exning, the County Council intends to expand the existing school on its current site in order to accommodate the children emanating from the dwellings identified in the Plan. The permanent capacity of the school has recently been expanded to 210 places and masterplanning has been carried out for future expansion to 315 places, which is sufficient for the level of growth proposed in the Plan.

School Name	Cap	Total rolls (inc. permitted housing)					Estimated Effect by 2031
		2017	2018	2019	2020	2021	
Total Places/Pupil Roll - Exning Primary School:	210	216	227	227	226	226	
Capacity minus 5% buffer	200						
Available Capacity (Absolute)		-6	-17	-17	-16	-16	
Available Capacity (With Buffer)		-17	-28	-28	-27	-27	
Cumulative Additional Dwellings (from trajectory)		0	0	0	40	80	205
Cumulative Additional Children		0	0	0	10	20	51
Effect of additional children from trajectory on absolute capacity:		-6	-17	-17	-26	-36	-67
Effect of additional children from trajectory on capacity, with buffer applied:		-17	-28	-28	-37	-47	-78

Figures may not sum due to rounding.

## 8. Kentford (Moulton)

Kentford is served by Moulton Primary School. The County Council intends to extend the school in order to mitigate the impact of development in Kentford. The Local Plan allocates land adjacent to the school site to enable this to happen. The principle of expanding Moulton School to 420 places has been discussed with the school governors and further detailed discussions are underway. This would be more than enough to accommodate the growth already permitted.

Note: the allocations identified in the Local Plan were permitted before the most recent (January 2017) forecasts were produced, hence they are already accounted for within the forecast to 2017.

School Name	Cap	Total rolls (inc. permitted housing)					Estimated effect by 2031
		2017	2018	2019	2020	2021	
Total Places/Pupil Roll - Moulton CEVCP School:	210	180	199	215	221	221	
Capacity minus 5% buffer	200						
Available Capacity (Absolute)		30	11	-5	-11	-11	
Available Capacity (With Buffer)		20	1	-16	-22	-22	
Cumulative Additional Dwellings (from allocations)		0	0	0	0	0	0
Cumulative Additional Children		0	0	0	0	0	0
Effect of additional children from trajectory on absolute capacity:		30	11	-5	-11	-11	-11
Effect of additional children from trajectory on capacity, with buffer applied:		20	1	-16	-22	-22	-22

Figures may not sum due to rounding.

## 9. West Row

The County Council intends to expand the existing school in order to mitigate the impact of development in the village. The Local Plan allocates land adjacent to the school site to enable this to happen. A feasibility study has been prepared and the target date to have this expansion in place is September 2018. Phase one has expanded the school to 315 places and further expansion to 420 places can be brought forward when needed.

School Name	Cap	Total rolls (inc. permitted housing)					Estimated effect by 2031
		2017	2018	2019	2020	2021	
Total Places/Pupil Roll - West Row CP School:	315	258	276	278	278	279	
Capacity minus 5% buffer	299						
Available Capacity (Absolute)		57	39	37	37	36	
Available Capacity (With Buffer)		41	23	21	21	20	
Cumulative Additional Dwellings (from trajectory)		0	0	11	61	111	152
Cumulative Additional Children		0	0	3	15	28	38
Effect of additional children from trajectory on absolute capacity:		57	39	34	22	8	-77
Effect of additional children from trajectory on capacity, with buffer applied:		41	23	19	6	-8	-89

Figures may not sum due to rounding.

## Appendix – Secondary School Forecasts

### 1. Brandon (IES Breckland)

School Name	Cap	Total rolls (inc. permitted housing)										Estimated Effect by 2031
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	
Total Places/Pupil Roll - IES Breckland School:	500	480	491	512	548	568	633	673	702	704	707	
Capacity minus 5% buffer	475											
Available Capacity (Absolute)		20	9	-12	-48	-68	-133	-173	-202	-204	-207	
Available Capacity (With Buffer)		-5	-16	-37	-73	-93	-158	-198	-227	-229	-232	
Cumulative Additional Dwellings (from trajectory)		0	0	0	0	0	33	33	33	33	33	33
Cumulative Additional Children		0	0	0	0	0	6	6	6	6	6	6
Effect of additional children from trajectory on absolute capacity:		20	9	-12	-48	-68	-139	-179	-208	-210	-213	-213
Effect of additional children from trajectory on capacity, with buffer applied:		-5	-16	-37	-73	-93	-164	-204	-233	-235	-238	-238

Figures may not sum due to rounding.

Notes on IES Breckland:

- The school is a free school and so outside County Council control.

## 2. Mildenhall

School Name	Cap	Total rolls (inc. permitted housing)										Estimated Effect by 2031
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	
Total Places/Pupil Roll - Mildenhall College:	1547	1182	1262	1337	1391	1459	1564	1651	1717	1759	1778	
Capacity minus 5% buffer	1470											
Available Capacity (Absolute)		365	285	210	156	88	-17	-104	-170	-212	-231	
Available Capacity (With Buffer)		288	208	133	79	11	-94	-181	-247	-289	-308	
Cumulative Additional Dwellings (from trajectory):		0	62	167	531	1124	1592	1923	2215	2445	2665	3587
Cumulative Additional Children		0	14	37	117	247	350	423	487	538	586	789
Effect of additional children from trajectory on absolute capacity:		365	271	173	39	-159	-367	-527	-657	-750	-817	-1020
Effect of additional children from trajectory on capacity, with buffer applied:		288	194	96	-38	-237	-445	-604	-735	-827	-895	-1097
Mildenhall Hub Relocation Phase 1, 11-16: 16+	1350 400											
Mildenhall Hub Relocation Phase 2, 11-16: 16+	1500 400											

Figures may not sum due to rounding.

Notes on Mildenhall:

- Relocating Mildenhall College to the Mildenhall Hub site will enable the provision of an additional 203 places in phase 1 (2020) and a further 150 in phase 2 (total 353 places more than the current Mildenhall College). Therefore the extent of the projected deficit at Mildenhall College is exaggerated by this table.
- This table discounts American pupils expected to leave the Suffolk school system to be educated at American Air Base schools.



### 3. Newmarket

School Name	Cap	Total rolls (inc. permitted housing)										Estimated Effect by 2031
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	
Total Places/Pupil Roll - Newmarket Academy:	969	637	717	746	795	841	880	911	958	990	1022	
Capacity minus 5% buffer	921											
Available Capacity (Absolute)		332	252	223	174	128	89	58	11	-21	-53	
Available Capacity (With Buffer)		284	204	175	126	80	41	10	-37	-69	-101	
Cumulative Additional Dwellings (from trajectory)		0	21	61	141	203	258	323	393	393	393	480
Cumulative Additional Children		0	5	13	31	45	57	71	86	86	86	106
Effect of additional children from trajectory on absolute capacity:		332	247	210	143	83	32	-13	-75	-107	-139	-159
Effect of additional children from trajectory on capacity, with buffer applied:		284	199	161	95	35	-16	-62	-124	-156	-188	-207

Figures may not sum due to rounding.

Notes on Newmarket College:

- The school site is considered large enough to enable expansion of the school to manage this growth without requiring additional land.