

**Suffolk County Council Statement on Brantham Regeneration Area
(Main Modification 25)**

This statement has been prepared by Suffolk County Council to help answer questions raised by the Inspector for the Further Hearing Session to be held on 25 September about the Brantham Regeneration Area.

1. Summary of position

- 1.1 Suffolk County Council previously submitted a statement about the site to the hearing on Monday 11 March 2013 (Matters 9a and 9b). The county council welcomes Babergh District Council's commitment to the regeneration of this site, as expressed in this Core Strategy.
- 1.2 For the county council, key issues relate to transport and education. At the previous hearing, and based on options for redevelopment, the county council confirmed that there are no "showstoppers" in bringing forward the employment-led regeneration. However, it was acknowledged that mitigation measures will be required in order to deliver sustainable development as articulated in the National Planning Policy Framework.
- 1.3 With the inclusion of up to 600 dwellings now being considered, the nature and type of mitigation can be considered further and the county council can provide an illustration of mitigation measures that will need to be addressed during the Masterplan and planning application stages.
- 1.4 As a general point, due to the close proximity of the site to Essex the county council, in conjunction with Babergh District Council, will continue to undertake appropriate consultation with both Essex County Council and Tendring District Council to assess and address any cross-border issues. Paragraph 2.6 of the Developers Guide (K14) provides more detail.

2. To what extent is the inclusion of the Proviso D land now supported by evidence?

2.1 Economic Benefits

- 2.2 The county council maintains its commitment to supporting the regeneration of this site, as expressed in this Core Strategy. The site has some substantial constraints but the very fact that a private developer is promoting redevelopment is a positive indication of market interest.

- 2.3 Throughout 2013, the county council has been working with Babergh and the other district and borough councils to identify key growth locations throughout the county. Working with New Anglia Local Enterprise Partnership (LEP), the aim is to develop a programme of activity to progress the delivery of jobs and economic development in these locations. Alongside sites such as the former sugar beet factory at Sproughton, this site has high market demand (because a developer is promoting the site) but with constraints that need to be addressed in the short-term before development can occur.
- 2.4 Being on the eastern main railway line between London and Norwich, the site is a prominent gateway location into Suffolk. The current condition of the site does not support efforts to market Suffolk and East Anglia as vibrant and attractive places to investors or visitors. Whilst difficult to quantify, the redevelopment will contribute towards marketing the wider area and have an economic benefit.
- 2.5 In addition to the 'place marketing' benefit, the redevelopment would have direct and indirect economic benefits. Firstly, the availability of commercial floor space (7,500 square metres of B1 and 38,500 square metres of B2/B8) will facilitate the retention and creation of around 1,100 jobs (full time equivalent), at least 500 being new jobs. The construction of the dwellings would support a further 900 nationally. Taken together, these could contribute around £90m Gross Value Added to the economy (at 2008 prices).
- 2.6 As well as the direct benefit, the creation of new homes and commercial floor space also has productivity advantages for firms because land (premises) and labour become more available. A further benefit arises from the spending on goods and services from the additional households. By way of examples, using the household expenditure survey, the 600 households might spend £103,000 on hairdressing services and £50,000 on bus services annually.

3. Are there any known constraints affecting the Proviso D land, and how might these be overcome: access, water, sewage?

3.1 Transport

- 3.2 Whilst the site has an existing industrial use, the original operation was formed and expanded when a greater proportion of journeys were made by walking or cycling. Critically, employees lived closer to their workplace, with lower access to private cars.
- 3.3 The draft Transport Assessment (**J09**) does review the transport implications arising from the development for 600 homes and the commercial premises. However, as stated previously, a full assessment will be necessary when precise details are known.

3.4 Highway mitigation measures are likely to be required at the Cattawade Street/Factory Lane priority junction (leading to the A137 roundabout) and the A137 Lawford mini roundabout. In addition measures to support sustainable travel will be required including improved cycle access to Manningtree Railway Station.

3.5 A second access (i.e. other than Factory Lane) will be required as the residential development is above 150 dwellings, this would also provide emergency access for the commercial uses on the regeneration site (for emergency vehicles if the Factory Lane access is unavailable).

3.6 The relationship between this development and Manningtree is relevant. Essex County Council is responsible for the management of the highway network over the River Stour and would also need to be involved in the preparation of the final transport assessment. Essex County Council has secured contributions from the development of a Tesco supermarket on Station Road to improve the railway crossing. These improvements would need to be included in the final transport assessment.

3.7 Education

3.8 The Developers Guide (**K14**) sets out the general approach to education matters, including how we calculate pupil yields anticipated to arise from new development. The following are anticipated pupil yields arising from a development of 600 residential dwellings:

- Primary school age range, 5-11: 147 pupils. Cost per place is £12,181 (2013/14 costs);
- Secondary school age range, 11-16: 105 pupils. Cost per place is £18,355 (2013/14 costs), and
- Sixth-form age range, 16+: 21 pupils. Costs per place is £19,907 (2013/14 costs).

3.9 The above calculations are based on the capacity of the schools and pupil forecasts and the assumption that all the 600 dwellings are 2+ bedroom dwellings. The final form of the development may, for example, include more flats and retirement homes which have lower or no pupil yields.

3.10 The local catchment schools are Brooklands Primary School (to the north of the site), East Bergholt High School and Suffolk One, Ipswich (16+). The following table updates the capacity and pupil forecasts that was presented in March:

School	Capacity	Forecast				
		2013-14	2014-15	2015-16	2016-17	2017-18
Brooklands Primary	210	213	201	199	194	198

East Bergholt High	830	908	880	860	823	762
Suffolk One (16+)	2,000	1331	1341	1329	1327	1281

3.11 Having considered the alternative options, the most sustainable and cost effective appears to be to expand (double in size) Brooklands Primary School from 210 places (1 form of entry) to 420 places (2 forms of entry). The county council cannot force schools to expand. However, initial discussions have been held with the Headteacher who agrees that expanding the existing primary school is the best local solution. This will need to be further discussed with the school's governing body.

3.12 The site of Brooklands Primary is large enough to expand the buildings (with associated play-space provision) to take an additional 210 pupils. However, it must be noted that if the school does extend in size to 420 places then, based on current Department for Education (DfE) guidance contained in Building Bulletin 99 for Primary Schools, the site would technically be below the minimum currently required. The school site is surrounded by houses so it will not be possible to enlarge the site. Therefore innovative design solutions will be required to address the potential shortfall as shown in the table below:

	Total Site Area (sq m)		
	Building Bulletin 99 Standards		Current area
	From	To	
210 places	9,760	10,060	17,040
420 places	17,320	19,300	

3.13 The close proximity to Essex is relevant to parental choice and alternative options, albeit not as ideal from a sustainability perspective. In Manningtree, Highfield Primary School (315 places) and Lawford Primary School (210 places) are both forecast to be at or over capacity by 2017/18. Manningtree High School (capacity 870 places) caters for ages 11 -16 and is forecast to have some limited capacity.

3.14 At the secondary school level, there is likely to be the need to seek some developer contributions to create additional places at the catchment East Bergholt High School, which is about 2.5 miles away. Suffolk One, which caters for ages 16+, currently has surplus places.

3.15 The county council currently operates a policy whereby children who live further than three miles from their catchment school and/or there is no safe walking/cycling route are entitled to free transport. If parents choose to send their children to out of catchment schools then transport costs fall on the parents/carers. The most sustainable long-term solution is for children living in Brantham to attend local catchment schools.

3.16 Other secondary schools in the area are Holbrook High School (5.5 miles away by road) and Hadleigh High School (8.6 miles away by road). These are less sustainable options and other planned housing growth may affect the capacity of these schools.

Early Years Provision

3.17 The Developers Guide (K14) sets out the general approach to early years matters, including how we calculate pupil yields anticipated to arise from new development. The yield from 600 homes is:

- Pre-school (age 2-4): 60 children. Cost per place is £6,091 (2013/14 costs).

3.18 Again, the above assume all the 600 dwellings are 2+ bedroom dwellings. The current requirement is for 15 hours per week of free provision over 38 weeks of the year for all 3 and 4 year-olds. The Education Act 2011 introduced a further statutory requirement for 15 hours free early years education for all disadvantaged 2 year olds.

3.19 Based on the above information, a 30-place early years setting should be provided within the development (on the basis that 30 children can attend morning sessions and 30 children can attend afternoon sessions in order to secure the 15 hours per week entitlement).

Libraries and other community infrastructure matters

3.20 Consideration will need to be given to assessing and securing appropriate mitigation for other local community infrastructure such as libraries and this will be in line with the guiding principles set out in the adopted Developers Guide.

4. Is the loss of open countryside justified by the evidence base, and have all options using the brownfield land been thoroughly explored?

4.1 The provision of up to 600 homes can be considered as enabling the redevelopment of the site through a privately-funded cross-subsidy. An alternative approach to this cross-subsidy could be for public funds to support the redevelopment.

4.2 As noted above, the redevelopment will have economic benefits. However, the local authorities and the LEP do not have the funds available to support the redevelopment. Furthermore, given the short-term tendency of funding streams (particularly the emphasis of loans and Tax Increment Financing) other locations might offer higher rates of return or faster payback.

4.3 The likely absence of public funding from central or local government to redevelop the site (and central Government's desire to avoid calling on the public purse to deliver growth) contribute to the justification for the loss of open countryside.

5. How would the Proviso D housing development and the employment regeneration on the original allocation site be linked and phased?

5.1 Given the likely need for the developer to obtain a return before undertaking the more substantial works, the Proviso D land may come forward in the first phase. Whilst 150 homes could be served by the existing Factory Lane, the secondary access might be preferred and will need to function and be built to the same standard as any residential estate road.