

Consultation Statement Developers Guide to Infrastructure Contributions in Suffolk

1. Introduction

Suffolk County Council worked collaboratively with district and borough councils in 2011 to publish the 'Section 106 Developers Guide to Infrastructure Contributions in Suffolk' and eleven accompanying supporting Topic Papers. This guidance document (renamed now as the 'Developers Guide to Infrastructure Contributions in Suffolk', and hereafter referred to as the 'Developers Guide') has now been revised by Suffolk County Council to update with legislation changes, build costs, and consolidating the previous versions individual Topic Papers into one document.

2. Update of the Developers Guide

The update of the Developers Guide began in 2020 and involved discussions with Suffolk County Council service areas over the span of several months, to ensure that the needs of each service area were being updated and explained concisely and accurately. Discussions were held with the lower tier local authorities. A formal public consultation took place in May 2021 and further stakeholder discussions were held in 2022.

3. Public Consultation May 2025

The purpose of this consultation was to seek comments and suggestions from professionals (including LPAs, developers, and stakeholders) and members of the public in Suffolk.

This consultation statement sets out the responses received and actions to be taken following the consultation process of the updated Developers Guide.

4. Methods of Consultation

The consultation of the draft Developers Guide was open for a six-week period, starting Monday 28 April to Monday 9 June 2025, with a smart survey remaining open until Wednesday 11th June 2025.

Emails were sent to all Local Planning Authorities in Suffolk, neighbouring district and county authorities, developers, and other key stakeholders. A consultation news release published on SCC's website.

A consultation portal was set up on Suffolk County Council's website, that contained the updated Developers Guide, and the online survey.

The consultation of the Developers Guide was publicised through Suffolk County Council Communications, to gain the opinions of members of the public.

5. Comments from Consultation

The table below summarises the consultation responses, and the actions taken by the County Council based on the comments and suggestions received. The comments were received via e-mail and through the smart survey.

The key issues raised during the Consultation are summarised as follows:

- Summary table consistency with costs (temporary expansion and Pre-School expansion)
- Further explanation of Libraries and Waste calculation
- Definition of infrastructure, and CIL v S106 in terms of new and expansion
- Queries around Education/Early Years/SEND.
- Queries around education costs

Further discussions were conducted with colleagues from Education & Early Years, Libraries, Waste, PRow, and Highways, for additional clarification and/or information to be added to their sections of the Guide.

Following the public consultation, comments were considered and the Developers Guide revised accordingly.

6. Equality Impact Assessment

To ensure the review of the Developers Guide is inclusive and not prohibitive to anyone involved in the process, a preliminary Equality Impact Assessment (Screening) was carried out.

This Screening EIA was presented to the EIA committee on 17th June 2021, and following subsequent amendments, has since been published to the Suffolk County Council website¹.

As the Developers Guide was an update to existing documentation and not new policy or strategy, it was decided that a full EIA was not necessary, and it wasn't necessary to screen after the amended version was produced for a final consultation.

Summary of consultation responses and action

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
Sarah Finn – Schools Infrastructure Manager Suffolk County Council	Whole document	The Education and Skills Funding Agency functions ceased on 31 March 2025 and transferred to the Department for Education. Please can you amend any reference to “Education Skills and Funding Agency” or “ESFA” to “Department for Education” or “DfE”.	Accepted	Amended
	Para. 3.4.5	<ul style="list-style-type: none"> reduce the number of dwellings that would generate the need for a new 420 place / 2 forms of entry primary school from 1312 to 1250 two bedroom houses. reduce the number of dwellings that would generate the need for a new 600 place / 4 forms of entry secondary school from 4000 to 3800 two bedroom houses. 	Accepted	Amended
	Para. 3.3.6	Table 4 change the paragraph under the table to: Generally standalone new settings are as a result of a wider residential development; therefore the above site areas are based on BNG and Drainage not being provided as part of wider development	Accepted	Amended
Roy Emmerson – Spatial Infrastructure Officer BMSDC	Whole document	<ul style="list-style-type: none"> Numbered paragraphs would make commenting on the document easier – can they be numbered going forward. 	Acknowledged.	Formatting to be addressed.
		<ul style="list-style-type: none"> The term lower tier local authorities...can't we say districts? Just seems odd choice of words particularly as LGR is on the horizon. 	The borough isn't a district.	None.
		<ul style="list-style-type: none"> CIL cannot pay for everything it needs to. The SCC 5 year plan demonstrates this. - the opportunity should be taken in this document to confirm this and to say that where necessary to achieve sufficient funds for infrastructure to mitigate impact from any development that it will be necessary to capture s106 to go alongside CIL so that necessary infrastructure can be provided. This will be undertaken on a site by site basis. But should also be reflected in the IFS and IDP. 	Acknowledged	Insert – “LPAs can ‘pool’ developer contributions collected through the CIL and section 106 agreements to fund the same infrastructure project. Since 2019, there has been no limit on the amount of contributions that LPAs can ‘pool’ to fund the

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		<ul style="list-style-type: none"> Cross Boundary infrastructure issues – LPAs can take the lead but this must be informed and supported by SCC who lead on some infrastructure delivery such as education particularly as SCC get consulted on all District planning applications and therefore can see where cross boundary impacts can arise. Does SCC get consulted on adjoining County applications where impact on Education provision and pupil places occurs between Suffolk and Essex and Norfolk and Cambridgeshire. In many cases, it will be a requirement for infrastructure to be provided in advance of all pooled contributions having been collected, for example within an early phase of a development. It will therefore be necessary to obtain funding from alternative sources and to collect developer funding retrospectively for these projects. (This addresses the Elmswell situation where CIL is forward funding and it will be paid for through retrospective collection of s106/miscellaneous contributions). 	<p>Agreed.</p> <p>Noted</p>	<p>same infrastructure project”.</p> <p>Add "with support of SCC"</p> <p>Insert 'forward funded'</p>
Roy Emmerson – Spatial Infrastructure Officer BMSDC	Para. 3.4.16	<ul style="list-style-type: none"> first paragraph needs amending as it says CIL is capable of funding all extensions of schools – it is not as the latest cost multipliers will be used in any CIL Bid whereas CIL is pegged at the time that the planning authority grants the planning permission and the development is measured for CIL. The SCC 5 year CIL spending plan confirms this situation in respect of current cost multipliers. Going forward if the cost multipliers being advised through this document and education updates are going to be increased for CIL funded or s106 projects this will need justification (for any increase in cost multipliers) on a case by case basis.(e.g. Stowmarket High School extension). 	Accepted.	Change to “The CIL charging authorities define what infrastructure projects are to be funded by CIL. Regarding education, additional places at existing early years, primary schools, and secondary schools, and post-16 places are capable of being funded through CIL, in conjunction with other

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		<ul style="list-style-type: none"> The cost of temporary buildings for education are mentioned in the main body of the text but not in the summary of cost multipliers. 	Very rarely requested – bespoke costs on a case by case basis will be assessed if required.	<p>funds, but what can and cannot be funded will be set out in the CIL charging authority's IFS or supporting documents.”</p> <p>None.</p>
	Page 52 – Table 8	all of the different types of education mentioned but no cost multiplier for expanded pre -school on a school site. But on page 2 in the summary, it says primary and pre-school expansion says £21,768.00. Please can this be clarified/alterd?	Agreed but to note the DfE have published updated local authority school places scorecard build costs on 26 June 2025	Added to table
Roy Emmerson – Spatial Infrastructure Officer BMSDC	Page 56	Contributions may also be sought towards the provision of specific education infrastructure such as cycle stands parent waiting shelters public transport to appropriate education establishments or for education materials and activities. Concerned that this ask for s106 is larger than transport costs and could cause viability issues. What does education materials and activities mean in this context?	Agreed	Revised paragraph for clarity and deleted education materials.
	Page 66	The only mention of LCWIPs is page 66, where it mentions Suffolk CCs LCWIP, but there is no mention of Babergh and Mid Suffolks LCWIP The relevant paragraph says:	Agreed	Clarified sentence.

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		<p><i>“Contributions to highways and transport improvements should be considered part of a holistic package to facilitate sustainable travel, as reflected by Suffolk’s Local Transport Plan (LTP) and in line with the priorities set out in the Suffolk Local Cycling and Walking Infrastructure Plan.”</i></p> <p>Consider our LCWIPs are important and there needs to be more about them in this document, i.e. what they are and how developer contributions through s106 and CIL contribute towards delivery of schemes and what role they play in Walking and Cycling Infrastructure.</p>		
	Page 76	Consider the section on funding for ISPA should be more robust and we should be looking to use this to justify collection of s106 and CIL for ISPA and modal shift mitigation particularly as CIL cannot be used for mitigation of some ISPA measures as they are not infrastructure.(e.g. smarter choices)	Acknowledged. Detailed non-technical guidance needed to support each transport mitigation area.	Changes made to section in line with SCC comment.
	Page 82	<ul style="list-style-type: none"> Libraries -it states that it may be necessary for a contribution towards books and resources only. This must be s106 only because this cannot be claimed for under CIL as CIL only pays for infrastructure. This may need clarification and a conversation about CIL funded library infrastructure projects going forward. Waste - New waste sites should be s106 rather than CIL as it is new infrastructure New libraries should be s106 rather than CIL as it is new infrastructure New health hubs would need to be s106 rather than CIL as it is new infrastructure Police – Concerned about costs and scope of all these requests (both s106 and CIL) and viability of development schemes. Suggest that this Police section is reviewed in the light of following comments - 	<p>Agreed.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Considerations to be addressed with Suffolk Constabulary at the time of an application for planning permission.</p>	<p>Clarify 2.3 with insertion of CIL regulation 10 definition of what CIL can be spent on. Add reference to ‘S106’ page 83.</p> <p>Down to individual Infrastructure Funding Statements. As above.</p> <p>As above.</p> <p>None</p>

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
Roy Emmerson – Spatial Infrastructure Officer BMSDC	Page 108	<ul style="list-style-type: none"> What does principally funded by CIL mean? Is this eluding to s106 or separate police funding. Should this be made clearer? Footnote is correct - BDC and MSDC would not do repairs and maintenance as part of any refurbishment Police – what does Communications including ICT mean - if this is about communication/ICT, this should be from Police budgets rather than CIL Custody facilities – are they new if so it should be s106 Mobile Police stations – this should be s106 as CI doesn't provide equipment If additional police facilities this is tantamount to new police facilities – this would need to be s106 and not CIL S106 - Concerned that SCC may be seeking funds for additional police officers whilst sites are being built out. Unspent s106 – Suggest Developers might need to know what happens if s106 is unspent 	Considerations to be addressed with Suffolk Constabulary at the time of an application for planning permission. District Infrastructure Funding Statement sets down what is funded by CIL and S106.	None.
Adam Nicholls – Principal Planner ESC	Page 23	<ul style="list-style-type: none"> Where would alternative funding could come from 	Capital borrowing.	None
		<ul style="list-style-type: none"> Probably better to either leave it just as “East Suffolk Council” or “East Suffolk Council (Covering the Suffolk Coastal and Waveney Local Plan areas)”. 	Agreed – wording not changed since last draft and not taken into account the East Suffolk 2023 CIL charging schedule.	“East Suffolk Council”
	Page 24	<ul style="list-style-type: none"> Doesn't specific the period that the interest will be changed – daily, monthly or annually. 	Late payment interest is calculated and applied from the date the payment was due until the date it is to be paid.	None.

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
	Page 32	<ul style="list-style-type: none"> I don't think contributions towards adaptations meets the CIL tests (bar unusual circumstances) – unless specific (M4(3)) need to be kitted out from first occupation with adaptations 	Accepted.	Remove.
	Page 33	<ul style="list-style-type: none"> This may be OK for more rural areas (although even here there can be cross-ward catchments, of course), but doesn't work as well as urban areas like Lowestoft where wards are close together. Suggest a slightly wider approach may be more justified (i.e. surrounding wards too). 	Understood. There's also issues of cross border sites. Could consider taking an average from the surrounding wards in towns.	Add – where a site cross wards the ward with the largest percentage of proposed development will be used in the calculation.
		<ul style="list-style-type: none"> 60 hours is extremely high – 12 hours per day. Is this really the case for as single child? 	This is just an illustrative example and uses 30 hours to help keep it simple	None.
	Page 46	<ul style="list-style-type: none"> Would be handy to state this figure in hectares too. 	Accepted.	Insert £247,100 per hectare
		<ul style="list-style-type: none"> "Be complete" might to better text, as they would clearly not be open for new pupils in the June. 	Agreed.	New primary schools are expected to be completed and handed over in June ahead of the new school year starting in September, and generally take 36 months for design, planning and construction.
		<ul style="list-style-type: none"> It isn't clear whether or not these costs would be in addition to contributions to permanent accommodation 	The paragraph does say 'in certain circumstances'.	None.
	Page 49	<ul style="list-style-type: none"> The appendix states that gas may be required too, although it is accepted that the list here is not exhaustive. 	Noted	None
		<ul style="list-style-type: none"> Including 	Agreed – no need to have "including but not limited to"	Delete; but not limited to.

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
	Page 116	<ul style="list-style-type: none"> Timing of Construction – it says June earlier in the document (p46) Last row – Please quote the £100,000 in hectares, also applies to p46 	<p>Agreed</p> <p>Agreed</p>	<p>Change to be consistent</p> <p>Add (£247,100 per hectare)</p>
Marie Smith – Head of Planning West Suffolk Council	These are officer comments rather than a council response	<ul style="list-style-type: none"> The developers guide provides a summary of costs that maybe sought by Suffolk County Council to mitigate impact arising from development. However, the ICB and Suffolk Constabulary are not monies collected by Suffolk County Council. Given the document does not include affordable housing and open space contributions (received by the district/borough councils) it does not provide the full picture and therefore is potentially misleading. A review of whether the document as currently written meets the legal requirements is required and requested for review before adoption. This should particularly focus on asks and requests for spending on staff, vehicles, resources as a general statement, books for libraries etc. which are not infrastructure requirements and would not meet the CIL Regulations. It would be disappointing if the requirements/document were published, which would 	<p>Wording to help with clarity.</p> <p>The Developers Guide is not prescriptive but a guidance document to illustrate likely demands placed by new development proposals. Some of its content may not be relevant for all proposals and in certain circumstances</p>	<p>Insert “This document demonstrates a joint working approach to public service provision by involving service providers and commissioners such as the Integrated Care Boards that cover Suffolk, East of England Ambulance Service, and Suffolk Constabulary. The Local Planning Authorities will have specific contributions for their areas such as affordable housing, open space and Recreational Avoidance Mitigation which are not discussed in this document but contact details to find out more information are available in section 5”.</p> <p>None</p>

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		come with an expectation from the community and then could not be fulfilled.	additional or alternative elements may need to be addressed. Each scheme will make an assessment against CIL regulation (2) 122.	
	Page 5	table 1 – summary of developer contributions sought - strategic transport mitigation – it is not clear what is meant by ‘examples include West Suffolk Council’s (WSC) Transport Mitigation Report (TMR) Funding’ It is disappointing that the positive work undertaken by West Suffolk Council and Suffolk County Council for the West Suffolk Local Plan which now includes a policy framework has not been detailed within this document. With the policy in place, Suffolk County Council now has the opportunity to set out how it will be implementing the policy within this document and would become the funding strategy.	Further guidance will be needed for each transport mitigation area. Section revised to clarify this.	None.
	Page 14 Page 14 contd	<p>LPA’s local plan status – West Suffolk Local Plan status is likely to change over next couple of months and this section will need to be updated to reflect this.</p> <ul style="list-style-type: none"> 2.8 Viability The wording is unclear. The paragraph references Local Plan making, the second paragraph relates to planning applications but this is not clear. Would a flow chart or a process map be helpful here. 3.3 Early Year and Child Care Provision and 3.4 Education It is supported that the DfE Securing develop contributions for education is followed. Any deviation should be evidenced within the document to ensure the request meets the legal requirements and is not challenged. This approach should also be applied to the cost breakdown. 	<p>Unlikely to be agreed by all local authorities in Suffolk.</p> <p>The DfE 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”.</p>	<p>None</p> <p>None</p>

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		<ul style="list-style-type: none"> 3.4.16 Collection, Investment and Use of Developer Contributions The wording should be made clear that where a viability case has been proven and SCC do not spend the monies, then the surplus could be used for other infrastructure which was not secured as a result. E.g. Monies were not spent on a school provision as this was not needed would then be redirected to affordable housing provision. A system with regular reporting to the District/Borough Council is needed setting out which monies have been received and what monies have been spent with the residual to allow the redirection of monies to work. West Suffolk would like this system documented in the document or discussed and agreed with West Suffolk prior to implementation. Section 3.7 Highways General comment to the highway section/chapter. It is not clear and does not reflect previous position made by Suffolk County Council throughout the Local Plan process and what is seeking to be achieved across Suffolk. WSC understanding was that SCC was going to be implementing a Suffolk wide sustainable transport mitigation strategy in the updated SCC developer guide. This does not come across in this section. Reference is made to WSC TMR funding. This document was prepared for the Local Plan. It is not a funding strategy nor is it a Local Transport Plan both of which are prepared by Suffolk County Council. This chapter needs to be expanded and clearer which details what SCC are seeking to achieve from sustainable transport. There is no information on strategic, local and site specific mitigation. There is no mention of a monitor and manage approach and its details. 4.2: The constabulary requests to be funded by CIL and by planning obligations should be the same and not different and relate to 'infrastructure asks'. 	<p>The circumstances where this would apply would be set out in the legal agreement.</p> <p>Section to be amended to aid clarity.</p> <p>Noted</p>	<p>None</p> <p>Amended.</p> <p>Depends on individual districts IFS</p>

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
James Mann -Head of Planning IBC	Whole document	<ul style="list-style-type: none"> The guidance generally recognises that Ipswich Borough Council is the local planning authority for applications within the Borough, and as such, the final decision on the planning obligations to be secured rests with Ipswich Borough Council. However, there are a few instances where responsibilities are attributed to Suffolk County Council that fall outside of its remit. These sections may benefit from clarification to avoid any potential confusion regarding roles and responsibilities. Whilst Ipswich Borough Council welcomes the new guidance, we wish to clarify that the costings and yield figures presented in the document are based on assessments undertaken by Suffolk County Council or their commissioned consultants. These figures have not been scrutinised or formally endorsed by Ipswich Borough Council, and it is important that this distinction is clearly noted. It is anticipated that developers may challenge these assumptions, either during the application process or at appeal. 	Noted	None
		<ul style="list-style-type: none"> Given the anticipated widespread use of this document, Ipswich Borough Council encourages regular reviews and updates to the evidence base that underpins it. While we acknowledge that this may increase the complexity and resource requirements of the project, we believe that maintaining a robust and up-to-date evidence base will help to reduce the level of scrutiny and challenge following formal publication. 	The DfE 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".	
	Page 2	<ul style="list-style-type: none"> On education costs included the 10% to meet improved sustainability standards – Previously the Department for Education (DfE) costs separated the 10% uplift, however Suffolk County Council (SCC) has consistently included this within its policy in consultation requests. IBC notes that the new guidance provides a rationale for this 	Noted	None

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		<p>approach, as referenced on page 35: <i>The DfE has updated its 'Basic Need Allocations for 2028: Explanatory note on methodology'. The Department for Education has calculated that the rate per pupil place must be uplifted by 10% to meet improved sustainability standards for a typical school, as set out in its updated School Output Specification (March 2025: https://www.gov.uk/government/publications/basic1need-allocations).</i></p> <ul style="list-style-type: none"> Table of costs – It would be helpful for the Table of Costs to include a breakdown of associated highway costs, to provide greater transparency and assist stakeholders in understanding the full scope of infrastructure requirements. 	<p>Many highway improvements are only known once an assessment of a particular site has been made. It would also be a lengthy document and very difficult to update if we included different examples and wouldn't help stakeholders as it wouldn't be known what was required. .</p>	None
James Mann -Head of Planning IBC	Page 25 – para. 2.6	<p>'Additional costs may be sought for the involvement by officers in the development and delivery of a project, for example the Schools Planning Manager.'</p> <p>This particular cost has not been previously encountered by IBC, and further clarification on its basis would be welcomed.</p>	Agreed	Example deleted.
	Page 32 – para.3.2.3	<p>'SCC would support the district councils as Housing Authority in seeking conditions or obligations towards:</p> <ul style="list-style-type: none"> General needs housing and adaptations in people's homes Housing with care / extra care housing provision for elderly Sheltered accommodation • Supported living (housing with care) for working age adults with special needs. 	Agreed.	Add "aligned with adopted Local Plan policies"

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		<ul style="list-style-type: none"> • <i>Key worker housing – for teachers, nurses, and police officers etc.'</i> <p>Consider adding wording to clarify that any requirements should align with adopted Local Plan policies and the supporting evidence base.</p>		
James Mann -Head of Planning IBC	Page 33 – para. 3.3.2	<p><i>'The Childcare Act 2016 and Secretary of State places a statutory duty on local authorities and the county council to secure the equivalent of 15 or 30 hours funded childcare for 38 weeks of the year for qualifying children and 15 hours of childcare for disadvantaged 2 year olds.'</i></p> <p>This duty does not fall within the remit of Ipswich Borough Council as the local authority. We recommend that the wording be revised to clearly delineate this responsibility as that of Suffolk County Council, to avoid any potential ambiguity.</p>	Agreed.	Change to - <i>The Childcare Act 2016 and Secretary of State places a statutory duty on local authorities and the county council to secure the equivalent of 15 or 30 hours funded childcare for 38 weeks of the year for qualifying children and 15 hours of childcare for disadvantaged 2 year olds.</i> This duty is undertaken by Suffolk County Council.
	Page 33 – para. 3.3.3	<ul style="list-style-type: none"> • <i>SCC's Early Years and Childcare Service uses local knowledge of the registered places to measure the capacity of early education provider provision. When examining the potential impact a development could have on the sufficiency levels, the existing capacity of providers within the ward of the development will be considered</i> <p>We recommend including a link to the defined ward boundaries to provide additional clarity and assist with interpretation.</p> <ul style="list-style-type: none"> • References to funded places and impact of private places. The reference to 'funded places' and the suggestion that 	Acknowledged.	Add hyperlink to wards page 39.

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		private payments reduce the availability of these spaces is noted. However, it is unclear whether the Childcare Act strictly requires the provision of funded places only. It is also important to note that funded places are typically available for only part of the year, which may affect the interpretation and application of this requirement.		
	Page 34 – Para. 3.3.4	<i>43.4 % of Suffolk's full daycare providers are tenants of Suffolk County Council. In some cases, the County Council may be approached by developers to build Early Years facilities directly. As the duty of childcare sufficiency sits with the County Council who has evidence of being able to build and lease out childcare provision with developer contributions; it is for the developer to provide evidence of how they can deliver a building that is registerable with Ofsted on terms that make is viable for childcare providers, some of whom are charities. Obligations that restrict the use of the building in perpetuity and cap market rents would be expected.</i> It is unclear whether this reflects what was previously agreed in relation to the Humber Doucy Lane (HDL) development. Clarification on this point would be helpful to ensure consistency with prior agreements or understanding.	SCC's starting position.	None.
James Mann -Head of Planning IBC	Page 40 – Para. 3.3.6	<i>In accordance with DfE guidance for 'Securing Developer Contributions for Education' (paragraph 54), new build sites for 30 places are required to be built on land large enough to be capable to accommodate an expansion to become a 60-place setting, if future needs arise. This means, should a development give rise to over 20 FTE places in an area with no surplus, a site area of 2200sqm will be sought within the development site for a new 30 place setting, capacity for expansion to a 60 place setting.</i> There is a concern regarding compliance with the CIL regulation tests. Further clarification is needed to demonstrate how this contribution is necessary to make the development acceptable in planning terms.	Proportionate costs for build costs would meet the CIL regulations. Justification will be provided on a case-by-case basis	None.

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
	Page 42 – Para. 3.4.2	<p><i>These contributions may be used to provide education facilities where there is no present shortfall of places but where it is reasonably expected to occur, either when existing approved development is commenced/completed or within the period for which forecast roll figures are available.</i></p> <p>Concern over compliance with CIL tests. Further clarification is needed</p>	This refers to forecasts and it being evidenced that there are no surplus places when taking into account the development and approved development. Justification will be provided on a case by case basis	None
James Mann -Head of Planning IBC	Page 43 Para. 3.4.3	<p><i>When estimating the number of children (pupil yield) that will require a school place arising from a new housing development, the county council takes account of the number of bedrooms in houses and flats that will accommodate children. Student and elderly accommodation (with restrictive conditions) are excluded from the calculation.</i></p> <p>Based on officer experience, it appears that this has been calculated at the outline stage by treating all units as having two or more bedrooms. Is this the standard approach, and if so, should this assumption be explicitly stated in the text for clarity?</p>	Where a housing mix is known at the outline stage, these are used when calculating places required. This approach is set out in the DfE guidance for securing education contributions	None.
	Page 45 Para. 3.4.4	<p><i>Where extension, refurbishment, or remodelling of an existing school is deemed appropriate, the County Council will not normally seek a contribution towards land costs. However, where expansion of an existing school necessitates the need for additional land, the developer will be expected to provide a free site and/or financially contribute full or proportionate costs of acquiring the additional land. If no such land is available and a local school is unable to expand any further, the County Council may object to the planning application as it would be unable to accommodate any additional pupils as a result of the development.</i></p> <p>In this context, the use of 'or' alone should be sufficient and more appropriate.</p>	Agreed.	Delete 'and'

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
	Page 45 Para. 3.4.5	<p><i>Where development does not generate the full need for a new school on its own, an education use land value of £100,000 per acre will be used to calculate proportionate contributions towards the provision of a new school. This contribution will be secured by s106 agreement. Additional land for existing schools will be secured at 2 x agricultural land value.</i></p> <p>Could clarification be provided on the source of the figure.</p>	<p>Agricultural land value in Suffolk is £5,500/acre to £15,000/acre ².</p> <p>Residential land value in Suffolk is £400,000 - £500,000 / acre.</p> <p>£100,000 / acre is an element of school development value (1/3) along with playing field land value (2/3).. A number of authorities use this including Kent and West Sussex.</p>	None.
James Mann -Head of Planning	Page 48 Para. 3.4.7	<p><i>However, contributions may not be collected for a named sixth form as this will depend on the strategy for providing post-16 provision in that area (e.g., the local secondary school does not have a sixth form so contributions will be directed to the appropriate provision(s) that serve the area).</i></p> <p>Officers note that developers often prefer to see a clear project of proposed contributions. Could clarification be provided on how this approach aligns with the requirements of CIL compliance?</p>	The DfE guidance talks about a preferred and contingency projects. Justification for sixth form contributions will be provided on a case by case basis	None
	Page 53 Para3.4.12	<p>SEND requirements</p> <p>This matter was scrutinised during the Humber Doucy Lane (HDL) appeal, and there remains some uncertainty regarding the robustness of Suffolk County Council's proposed ratio. Further clarification or evidence may be required to ensure that this approach can withstand potential challenge.</p>	Await HDL appeal decision. The DfE guidance sets out the general approach to securing SEND contributions. Justification will be provided on a case	None

² <https://www.rics.org/content/dam/ricsglobal/documents/market-surveys/H1-2024-RICS-RAU-Farmland-Market-Directory-of-Land-Prices.pdf>

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
IBC			by case basis including pupil yields	
	Page 59 Para. 3.4.17	<p><i>A Planning Performance Agreement may be entered into, seeking contributions for initial design work for the school to address site specific concerns where more detailed consideration of design is necessary to input into the s106 Agreements.</i></p> <p>IBC has concerns regarding the practicality of this approach. Historically, design costs have typically been secured through financial contribution. Unless a planning application includes the school itself, it is unlikely that design work would be necessary at that stage, as planning permission for the school would not yet have been granted.</p>	Option may be necessary.	None.
	Page 60 Para 3.5.1	<p><i>SFRS and is in no conjunction with any other Fire and Rescue Service.</i></p> <p>Suggested revision: "SFRS and is not in conjunction with any other Fire and Rescue Service".</p>	Accepted.	Amended as per comment.
	Page 60 Para. 3.5.2	<p><i>In the event of works commencing on site without compliance with the planning condition, appropriate action shall be taken by the LPA, and the SFRS shall be kept informed of any action.</i></p> <p>IBC considers this statement to be outside the scope of the guidance, as responsibility would sit with IBC as the LPA.</p>	Accepted.	Deleted.
	Page 61 Para. 3.5.2	<p><i>If ownership of a development site or any individual phase of the development site changes ownership before or after planning permission has been granted, SFRS requests that the LPA updates SFRS with any amended ownership and contact details.</i></p> <p><i>The new development owner will adopt all the existing conditions.</i></p>	Understood.	None.

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
James Mann -Head of Planning IBC		IBC acknowledges that this is only a request of LPAs, however, its implementation cannot be guaranteed, as there maybe uncertainty around whether the land has been subsequently sold or transferred.		
	Page 62 Para. 3.5.4	<p><i>No development shall commence until a scheme has been submitted and agreed by the relevant district or borough councils in consultation with SFRS, for the provision of required fire hydrants (served by mains water supply) forming part of the development with a relevant planning condition in place.</i></p> <p><i>No dwelling shall be occupied until the hydrants serving the development have been provided to the satisfaction of the district or borough councils in consultation with SFRS.</i></p> <p>In practice, this condition would not be workable. The Planning Inspector leading the Humber Doucy Lane appeal, stated that conditions should not reference “in consultation with...”. The condition would require the LPA to confirm that acceptable provision has been made, which would require an onsite review. Suggested alternative as follows: “Prior to any works above slab level, details of the location of fire hydrants and a strategy to ensure their provision shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be installed and operational prior to first occupation of the dwellings (including apartments) served by that hydrant.”</p>	Agreed.	Substitute with “Prior to any works above slab level, details of the location of fire hydrants and a strategy to ensure their provision shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be installed and operational prior to first occupation of the dwellings (including apartments) served by that hydrant”.

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
	Page 64 Para 3.6.3	<p><i>The ongoing operation, management and safeguarding of functional SuDS may require appropriate s106 obligations. Where these may have foreseeable impact on the LLFA, then it may be necessary to seek appropriate contributions.</i></p> <p>It is noted that this requirement applies in cases where the SuDS are to be adopted by Suffolk County Council (SCC).</p>	Noted.	None.
	Page 66 Para 3.7.2	<ul style="list-style-type: none"> <i>For a modest access fee. It would be helpful to provide greater clarity.</i> In practice, the use of this tool has often been a point of contention between Suffolk County Council (SCC) and applicants, so clearer guidance may help to reduce potential disagreement. <i>SCC has the Suffolk County Transport Model (SCTM), which is a cost effective and appropriate tool available to be used by developers, for a modest access fee.</i> <p>IBC officers note that the usage of this tool has been a sticking point with developers. We suggest that this sentence is either reworded, or the tool be offered in an alternative format.</p>	<p>There is a cost to SCTM, and it can't be offered in another way as the associated costs for the model need to be paid for. Developers are welcome to produce their own Saturn (or equivalent) model.</p> <p>It's only applicable to the larger 500+ sites.</p>	No changes.
	Page 76 Para. 3.7.5	<p><i>Measures in a strategy for which developer contributions will be sought together with other funding sources includes, but are not limited to:</i></p> <ul style="list-style-type: none"> <i>Walking and cycling infrastructure; including access to public transport</i> <i>Bus services, including a quality bus partnership;</i> <i>Park and ride;</i> <i>Demand responsive transport;</i> <i>Smarter choices;</i> <i>Enabling technologies; and,</i> <i>Monitoring</i> <i>Traffic calming measures</i> <i>Public realm improvements</i> <i>Access to public transport</i> 		

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		<p><i>Contributing towards delivery of a mitigation strategy does not preclude other appropriate transport requirements, such as site access improvements and mitigation of direct impacts, or the need for effective travel plans. Other sources of funding, such as from the Central Government, are anticipated to form a part of the overall approach to funding.</i></p> <p><i>An officer group involving representatives from each ISPA authorities is developing the funding mechanisms together with the detail and delivery of the mitigation measures.</i></p> <p>IBC supports the inclusion of sustainable transport measures. We would recommend that “modal shift” is also included within the monitoring section. This would improve alignment with the ISPA Transport Mitigation Strategy and Policies CS5 and CS17 of the IBC Local Plan. Electric Vehicle Charging points, funding of Traffic Regulation Orders and PROW Improvements should also be included within the developer contributions list. Car clubs should also be included within the list of transport measures, these have seen inclusion in IBCs previous S106 agreements.</p> <p>We also recommend that Air Quality Damage Cost Calculations are also referenced in this section to align with the Defra directive. Assess the impact of air quality - GOV.UK</p>	Agreed	Amended as per consultee response.
James Mann -Head of Planning IBC	Page 77 Para. 3.8.1	<p><i>The Access Model, for the long-term future, is based on a mix of libraries and community outreach. It recognises the opportunities that sharing premises with other services and businesses brings and encourages an innovative approach where library services might be co-located in existing or new premises. Creating hub type models allows for communities to be able to access central hubs situated in the local community where people can access all their needs and services to support their health and learning.</i></p> <p><i>There are 45 libraries serving Suffolk.</i></p>	Not necessary.	Link is already provided

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
		We note the inclusion of the Libraries Needs Assessment and recommend that a direct link is included within the guidance for ease of access.		
	Page 80 Para. 3.8.3	<p><i>The financial charge for the developers is based on a national benchmark charge for each person expected in a new housing development. The charges are based upon average cost and space benchmarks for library, archives and museum provision, supported by extensive survey work.</i></p> <p>IBC notes that this charge has been retained at the national benchmark, rather than being adjusted to reflect Suffolk market factors. Justification would be welcomed as this is an outlier within the wider document.</p>	Figure is adjusted for East of England BCIS Local Adjustment factor.	No change.
	Page 104 Para 4.1	Healthcare contributions It appears that the proposals may seek contributions beyond capital infrastructure, such as funding for ambulances. It will be important to consider whether such items are already funded through other mechanisms or public funding streams, to avoid duplication.	Case by case basis and justification will be required at the time.	No change.

Respondent	Section/page number	Comment/suggestion	SCC Comment	Action taken
James Mann -Head of Planning IBC	Page 106 - 7 Para. 4.2	<i>The Home Office grant settlement is usually based on a defined population level derived from ONS mid-year estimates at a 'fixed' or 'baseline year'. The funding award is then projected forward at the baseline population level for 3 years and does not take into account any subsequent population increase arising from housing growth within the intervening period before the next grant settlement is awarded. This process therefore leads to a 3-year funding lag.</i> IBC supports the acknowledgement of the 3-year funding gap, as this issue has required careful consideration within existing major developments.	Understood.	No change.
	Page 114 - 122 Appendix A	<i>Appendix A: New School Requirements</i> IBC welcomes the inclusion of the comprehensive checklist for New School Requirements	Support.	No change.

Suffolk County Council Smart Survey Results – Specific questions were asked in a focussed survey.

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
Wickhambrook Parish Council	3. Neither	3. Neither	3. Neither	3. Neither	3. Neither	Yes, why were there no specific questions on <ul style="list-style-type: none"> Flood and Water - It is required that all major developments (defined 	Comments welcomed. The reason why there were no other specific questions in the survey is because this was a

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						<p>as a site that includes 10 or more dwellings, or has an area of 0.5 hectares or more) incorporate SuDS. Take out "unless there is clear evidence that this would be inappropriate"</p> <p>Funding for time to liaise between Flood Teams and Parish Council for the proposed development should be allocated in each instance to allow for a clearer understanding of the issues and development of appropriate responses.</p> <ul style="list-style-type: none"> • Highways <p>Full transport assessments will be required for residential developments that generate 'significant traffic', in Suffolk this threshold tends to start around 50 dwellings, and other uses in line with requests for Travel Plans as per the Department for</p>	<p>focussed consultation as earlier consultations have taken place on the whole document. No changes proposed.</p>

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						<p>Transport's Guidance on Transport Assessment (2007). Threshold should be reduced in Local Service Centres and below which are serviced by fewer and lower class roads. Note that the policy makes no mention of developments in communities smaller than towns. Developments in villages and smaller rural communities more likely to require an integrated travel plan which includes public transport provision.</p> <ul style="list-style-type: none"> • Public Rights of Way - agree with the proposals set out in the guidance <p>All of which are of both high importance and relevance to parish councils?</p>	
I am responding	3. Neither	3. Neither	3. Neither	3. Neither	3. Neither	A major point has been overlooked. Housing cannot be achieved on the scale required due	The Developers Guide doesn't set housing targets, that is Local Plans

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
as a member of the public						to other factors. Currently Anglian Water are providing a blanket objection to any sites without planning permission as their water recycling centres (sewage treatment works) have insufficient capacity. Where villages have a small WRC serving them and a proposal is put forward for increasing the number of dwelling, they are refusing to support it. AW are obliged to provide treatment to foul water where there is a new planning approved scheme, so they are avoiding this by objecting before any approval is granted. The new framework has just been granted AMP8 and no allowance for upgrades is included within this either. As such there will be no improvements to accommodate the new developments for at	and in the future the Mayor's Spatial Development Strategy. No changes necessary.

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						least the next 5 years, and only then will improvements commence which will take decades to complete, and require AW costs to be passed onto their customers. This is a major issue not yet in the publics eye.	
Chilton Parish Council	3. Neither - I don't have the experience to answer this well. Long past the age of getting children into preschool places.	3. Neither - Once again outside my knowledge set. I can see how costs per pupil/place have been arrived at from the Concertus report. I'm not sure a figure of 10% increases when the annual published rate of inflation nationally for the same period was much less than the figure above.	3. Neither – I don't have the experience of building costs, I can see how you have arrived at your calculations.	2. Agree – I can see how the figure has been arrived at , it is logical. What I would say is that people do not use libraries to borrow books as much as they did in the past. A useful but fairly expensive feature in some libraries is the creation of warm areas for people.	5. Strongly Disagree – From your table both Ipswich and Sudbury recycling centres need to be redeveloped on new sites, cost-your figure £7 million each, but rebuild costs appear to be £143 per resident contribution for Ipswich and £334 for Sudbury.??	There is a lot of reading and information to be looked at.	Acknowledged. No changes.
I am responding on behalf of	3. Neither	3. Neither	3. Neither	-	-	-	Not applicable.

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
an organisation or a professional body							
I am responding on behalf of an organisation or a professional body	1.Strongly Agree	3. Neither	3. Neither	-	-	-	Not applicable.
I am responding as a member of the public	3. Neither	3. Neither	3. Neither	-	-	-	Not applicable.
Persimmon Homes Suffolk	5. Strongly Disagree – The table is somewhat unclear, especially as the “Number of Children” heading appears twice and the asterisk is missing from “0yrs Working Parents” in the first column of the table. There is a general point to make	4. Disagree – Table 8 shows costs substantially above DfE Scorecard costs. The reasons for the cost differences are not set out clearly in the summary report, and it is consequently difficult to accept that higher figures	5. Strongly Disagree – DfE Scorecard costs should continue to be used, unless design work is sufficiently progressed to be able to demonstrate there are specific factors that will increase (or	4. Disagree – The calculation should take into account the cost of a specific project that is demonstrably required, and not be based on a theoretical and outdated recommendation for library floorspace. It	2. Agree – Agreement is contingent on evidence of need and an audit trail if expenditure is in advance of need. CIL funding would appear to be more appropriate for this purpose, although it is recognised that not all authorities in Suffolk have	Yes. In general, bringing previous documents together into one comprehensive document is considered helpful, and the intention to provide regular updates is noted. The following comments reference the paragraph	SCC response highlighted red against each response to the questions

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
	<p>about rounding, which is that rounding is unnecessary and should be avoided as far as possible. Whilst it may be thought that rounding makes little difference, it can make a substantial difference - as does in this case. Assuming 25 0-4 year olds is correct, the calculation should result in 11.339 places per 100 dwellings. The proposed figure of 12.0 is therefore overstated by nearly 6%. The difference in cash terms for a development of 100 dwellings would be over £47,500 (based on a contribution towards a 60 place new build facility). This would be an</p>	<p>should apply. The figures in Table 8 are not agreed – other than those applying to primary expansion and secondary expansion.</p> <p>The base dates applying to costs should be included throughout the document, and should preferably be consistent. For clarity, the index values should be stated, where known.</p> <p>SCC response - An Independent Review of the paper to ensue robustness of the cost estimates is available as part of the appendix.</p> <p>The DfE guidance para 35</p>	<p>decrease) costs. It is reasonable to add an uplift of 10% for sustainability measures, until DfE incorporates such costs into its Scorecard figures.</p> <p>SCC response - By the time a project is designed in many cases it will be too late to have secured the appropriate level of contribution as the costs would not be available. When a project exists the design costs will be used, but in the interim the cost estimates are based on delivering schools in Suffolk and reflect the true costs of school delivery. These costs are benchmarked</p>	<p>should also be based on the net increase in population. CIL funding would appear to be more appropriate for this purpose, although it is recognised that not all authorities in Suffolk have adopted CIL charging.</p> <p>SCC response - Noted. No change.</p>	<p>adopted CIL charging. The costs are relatively modest, and there appears to be good evidence that additional provision is required.</p> <p>SCC response - Noted. No change.</p>	<p>numbers stated.</p> <p>2.2 The potential need to forward fund provision is recognised. It is suggested, where such funding is made available, that clear policy support is established along with a definitive audit trail when decisions are taken.</p> <p>3.3 The embedded link for Childcare Choices appears to try to open a Teams message!</p> <p>3.3.4 Early Years Developer Contributions - While appreciating that SCC would prefer to have control of new Early Years provision, this is clearly not a necessity and a blend of different sorts of provision is likely to provide wider choice for parents. Developers should be assisted to explore alternative options for</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
	<p>unjustified and unreasonable additional burden to impose on development. SCC should use unrounded figures throughout its planning obligations work.</p> <p>It is understood that SCC looks at eligibility on a ward by ward basis, and then calculates averages that are used universally. Given that the characteristics of households in new dwellings may well differ for those on existing dwellings, the use of an average is considered reasonable. It is unclear what the sentence, "Depending on ward eligibility this FTE figure will change." is</p>	<p>sets out when higher costs can be used in preference to the Scorecards. We understand the implications that the higher figures may arise, but SCC cannot continue to borrow to deliver new school places.</p> <p>The scorecard costs are based on LA reported projects between 2015/16 and 2017/18, adjusted for inflation and regional variation. The projects are so historical even with inflation, they do not reflect the costs of delivering educational projects today.</p>	<p>against schemes across the country and are less than many reported schemes. For example see a primary school scheme in Leicestershire - Wellington Place Primary - 210 places £9.3m = £44,285 / place</p> <p>https://www.willmottdixon.co.uk/projects/wellington-place-primary-school</p>			<p>new provision if they wish to do so. Likewise where expansion of existing provision may be the best way forward, developers should be given the opportunity to explore options with existing providers which may produce good outcomes.</p> <p>3.3.4 SCC should apply DfE Scorecard costs for new build projects as well as expansions. While the DfE advice quoted at the start of the section is acknowledged, SCC must be prepared to justify higher costs in detail if it wants to apply them. Table 2 and Table 8 appear to show that SCC has not been cost efficient in its delivery – by comparison to DfE Scorecard costs. The base dates for costs should be included throughout the document, and should</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
	<p>intended to convey.</p> <p>The sentence, "Please note, children begin attending Primary School from age 5 and cease to require early years and childcare provision." is incorrect. Most children begin attending primary school before their fifth birthdays – which is taken into account in SCC's calculations.</p> <p>The method of calculation appears logical, although there are a number of aspects that should be recognised, and it may be appropriate to take into account depending on circumstances:</p>					<p>preferably be consistent.</p> <p>3.3.6 It would be useful to include the site area requirements for standalone sites, for all three sizes of facility, in Table 4. The suggestion that sites should be rectangular in shape and flat is an ideal, which may not always be achievable – and the same applies to other requirements. In more detail:</p> <ul style="list-style-type: none"> • Request for land to be rectangular in shape and flat – Persimmon Homes have previously provided numerous functional parcels of land for education uses which have not been rectangular in shape or flat. Such request does not consider the constraints and context of the site and would rule out 	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
	<p>a) the calculation is of population resident in new dwellings, and takes no account of the net increase in demand when local moves and wider population change are taken into account. In effect, the population is considered to be all new and additional – which is demonstrably incorrect;</p> <p>b) it should also be recognised that new development tends to attach above average numbers of young children, and consideration should be given to whether “full provision” to meet a theoretical peak is appropriate - especially in the case of large</p>					<p>numerous acceptable and suitable school sites.</p> <ul style="list-style-type: none"> • Request for no existing trees including root protection zones within the site area – This request is unreasonable as a suitable education site may have trees on the boundary, which nonetheless may be located within the open space areas for the school site and would not pose issues to construction. • Request for education site to be connected to a site wide strategy for drainage and BNG – Due to the significant time-delay in the detailed design and subsequent delivery of school sites within associated residential developments, in common with any other non-residential uses, both surface water drainage and BNG requirements 	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
	<p>developments; and</p> <p>c) details of existing settings and the provision they offer should be readily available, to support understanding the need for additional places.</p> <p>SCC response - Q2 Number of children appears twice for 15 hours and 30 hours. No change.</p> <p>* readded.</p> <p>Rounding is only carried out at the end of the calculation. No change.</p> <p>The Developers Guide sets out the general principles which will be used to calculate and secure contributions for</p>					<p>should be able to be suitably accommodated within the extent of the parcel provided.</p> <ul style="list-style-type: none"> • As evidenced with a number of current and previous developments, the design and delivery of school facilities tend to come forward many years after the technical and environmental infrastructure strategies for the residential elements have been designed and implemented. • Seeking to place the onus on the developer to 'future-proof' residential developments to incorporate unknown drainage and BNG requirements or do so retrospectively would clearly be problematic and likely to result in additional costs and delays in housing delivery. • In particular, any 	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
	early years provision but noting that justification will be provided on a case by case basis					<p>residential developer must have full control of the BNG which can be provided within the extent of their site, in order that it can be confirmed prior to commencement, as required by the mandatory legislation.</p> <p>3.4.2 Use of a “5% buffer” – Reference is made to an appeal in Gloucestershire. A more recent appeal, Land at Gloucester Street, Newent, Gloucestershire (3348402) also considered this issue, evidently in some detail. In this more recent case the Inspector concluded “that 2% is the appropriate operating margin.”</p> <p>3.4.3 Pupil Yields – The DfE pupil yield data used for sixth form has been found to include children not in school sixth forms or</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
	<p>Calculation in the Developers Guide is an average for Suffolk. When calculating the FTE children arising the ward data is used for that location.</p>					<p>sixth form colleges. Consequently the figure is unrealistically high. As SCC will be aware, total sixth form numbers across both Y12 and Y13 normally equate to about one year group.</p> <p>Also, DfE pupil yields are calculations of pupils resident and are not all new and additional pupils. When assessing the needs arising from development, account must be taken of wider demographic change. This is particularly the case for secondary, sixth form and SEND, as these facilities draw from a wide area.</p> <p>These matters were discussed in relation to an appeal into development at Humber Doucy Lane. An appeal decision is awaited, which may or may not support the approach taken by</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
	<p>Changed to 'age 4'.</p> <p>Q2 - Acknowledged. No change</p>					<p>SCC on pupil yield and assessment matters. Education evidence was considered at a 'round table' session, and was not subject to formal cross examination.</p> <p>3.4.7 School Site Areas – The primary school site areas shown in Table 7 do not accord with BB103, are excessive and do not represent efficient use of land – which is generally recognised as a scarce resource. DfE has advised against going over area guidelines, stating, "There is an important balance to be struck between educational requirements, in terms of the curriculum and its delivery, the area of accommodation or land needed to support those requirements, and both the initial cost and running costs of that area.</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						<p>Excessive area is to be avoided; ... but will represent an unnecessary drain on a school's budget year after year." (source: BB82).</p> <p>3.4.8 Comments on paragraph 3.3.6 also apply here.</p> <p>Connection to surface water drainage with no attenuation on the school site – as outlined previously, the school site should be able to cater for its own drainage including attenuation.</p> <p>Checklist for determining school site suitability (Appendix A) – The checklist provided lists numerous criteria which could prejudice the selection and use of a school site within a wider scheme. The requirement for a freehold transfer at 'no cost' may not be</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						<p>appropriate to the circumstances. A long leasehold can provide the same security for education provision, and it may be reasonable to allow for land value if the site being provided facilitates other development.</p> <p>With no justification provided, the request for a minimum of 130m of road frontage for a school site is unreasonable and provides further restrictions on the shape of the parcel. Furthermore, it would be the responsibility of the architect to design a scheme that suits and fits within the parcel provided.</p> <p>The request for a level site and maximum gradient to not exceed 0.25m across the whole site is neither logical nor practical and would rule out a</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						<p>large proportion of possible school sites. Again, it would be the responsibility of the architect to design the school in response to the levels constraints (such as through tiering).</p> <p>Provision of an indemnity for the protection of the school site is an unnecessary burden in terms of time and monetary cost.</p> <p>Locating a pump station or substation within 10m of the school site boundary would not significantly impact the school, as there would be significant planting buffers both in the school site and within the adjoining development. Such infrastructure is heavily restricted by utilities companies on where they can be located (levels, distances, etc),</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						<p>so flexibility must be provided to ensure that these services are provided.</p> <p>Any costs associated with relocating, re-routing, remediating, removing or disposing of any live service, underground obstruction or contamination should be covered by the developer of the school site.</p> <p>SCC reserving the right to request additional site area to meet site specific BNG requirements could detrimentally affect the developable residential area of the site, thereby making a site unviable and blocking the delivery of affordable housing.</p> <p>The request for a specific number of vehicular and pedestrian entrances is somewhat</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						<p>unnecessary and further restricts the location of a school site. Any entrances would be discussed during the masterplan stage.</p> <p>3.4.15 School Transport Contributions – These should only need to be paid for a few years. Three years would align with the guidance in paragraph 54 of the DfE guidance document, 'Securing developer contributions for education, August 2023'. It may be more appropriate to calculate the actual cost incurred by SCC, and there is no reason that a refund of unspent monies could not be provided after three years.</p> <p>3.4.16 Refund of uncommitted monies – It is considered that</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						<p>uncommitted early years and primary education contributions should be refunded within five years or less following completion of development, It is inconceivable that provision would not have been committed by that time.</p> <p>3.8 Libraries and Culture – In order to meet the legal requirements for planning obligations, SCC needs to present clear evidence that existing facilities are unable to cater for the needs of the additional population that is a consequence of development. It is not appropriate to seek funding for maintenance or refurbishment works that are required irrespective of development. Library contributions were also discussed at the</p>	

Q1. In what capacity are you responding to this survey?	"Q2. Early Years FTE child yield - Places Arising from New Development	Q3. Education costs – New build construction costs	Q4. To what extent do you agree with the proposed new build costs?	Q5. Libraries contribution per dwelling?	Q6. Waste – per dwelling cost per Recycling Centre	Q7. Do you have any further comments on these changes to the Suffolk County Council Developers Guide to Infrastructure Contributions in Suffolk?	SCC Comment and Action taken
						<p>recent appeal into development at Humber Doucy Lane.</p> <p>SCC Response – The guide doesn't set out to be prescriptive but providing guiding principles to be assessed against each site. Irregular shapes school increase the costs of school delivery.</p> <p>School applications are more likely to be RM applications in the future so BNG and drainage issue will need to be addressed at the outline stage for the wider development.</p> <p>DfE Securing developer contributions for education para 9 recommends <u>at least</u> 10 years for return period.</p>	