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To: Members of the West Suffolk Joint Growth Steering Group

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4 May 2016

Dear Councillor

WEST SUFFOLK JOINT GROWTH STEERING GROUP - TUESDAY 10 MAY 2016

I am now able to enclose, for consideration at the meeting of the West Suffolk Joint Growth Steering Group on 10 May 2016, the following report and associated Appendices that were unavailable when the agenda was printed:

Agenda Item No

4. <u>Mildenhall Hub: Development Brief</u> (Pages 1 - 108)

(Consultation closed on Monday 25 April 2016)

Report No: JGG/JT/16/004 (TO FOLLOW)

Yours sincerely

Sharon Turner
Democratic Services Officer (Cabinet)





West Suffolk Joint Growth Steering Group



Title of Report:	Mildenhall Hub: Development Brief		
Report No:	JGG/JT/16/004		
Report to and dates:	West Suffolk Joint Growth Steering Group	10 May 2016	
	FHDC Cabinet	17 May 2016	
Portfolio holder:	James Waters Portfolio Holder for Planning and Growth Tel: 07771 621038 Email: james.waters@forest-heath.gov.uk		
Lead officer:	Chris Rand Principal Planning Officer (Major Projects) Tel: 01284 757352 Email: chris.rand@westsuffolk.gov.uk		
Purpose of report:	Many of the buildings housing public services in Mildenhall are either coming to the end of their planned lives, or require major investment. Any growth within the town will put an extra demand on these facilities. There is the potential to bring together a number of public services on to one site in order to create a single 'hub'. This would help reduce running costs and improve public access as well as freeing up vacated sites for other uses.		
	Policy DM4 of the Joint Development Management Policies Document requires that a Development Brief will be required for a proposal which is: i) being of a size; and/or ii) in a location; and/or iii) proposing a mix of uses; and/or iv) of significant local interest such as to make this necessary		
	The policy requires the Development Brief shall have been through an agreed process of consultation and approved		

	prior to the de	termination of a planning application.	
		L6 the West Suffolk Joint Growth Steering ed the draft Mildenhall Hub Development Brief ultation.	
	The formal consultation process commenced on 7 March 2016 and ran until 25 April 2016 and included a drop-in event for neighbours and interested parties held at The Pavilion in Recreation Way on 6 April 2016. In addition, a separate meeting was held with a local residents' group at their request.		
	Following consultation, the masterplan has been amended to take account of the many comments and suggestions.		
	Officers are satisfied that the Development Brief has been prepared in accordance with the Council's Protocol for preparing Development Briefs.		
Recommendation:	It is <u>RECOMMENDED</u> that, subject to the approval of Cabinet, the Development Brief for the Mildenhall Hub, be adopted as non-statutory planning guidance.		
Key Decision: (Check the appropriate box and delete all those that do not apply.)	Is this a Key Decision and, if so, under which definition? Yes, it is a Key Decision - \square No, it is not a Key Decision - \boxtimes		
Apr con con		nsultation took place from 7 March 2016 to 25 ril 2016. Details of the consultation and nmunity engagement events together with sequential changes to the masterplan are liressed below.	
Alternative option(s)): • No	one considered	
Implications:	Limbiantiana	Vas D. Na 57	
Are there any financial implications? If yes, please give details		Yes □ No ⊠ • Not directly as these will be addressed separately for the Hub project.	
Are there any staffing implications? If yes, please give details		Yes □ No ⊠	
Are there any ICT implications? If yes, please give details		Yes □ No ⊠	
Are there any legal and/or policy implications? If yes, please give details		Yes ⊠ No □ • It is intended that the final Development Brief will be adopted as non-statutory planning guidance by Forest Heath District Council	
Are there any equality implications? If yes, please give details		Yes □ No ☒ • The public consultation and community engagement events sought to engage the local community.	

Risk/opportunity assessment:		(potential hazards or opportunities affecting corporate, service or project objectives)	
Risk area	Inherent level of risk (before controls)	Controls	Residual risk (after controls)
Failure to approve the Development Brief for consultation could inhibit the local community and Council's ability to shape the nature and content of planning applications for the development of this important site.	Low	Adopt the Development Brief as a non-statutory planning guidance.	Low
Ward(s) affected:		Market, Great Heath	
Background papers: (all background papers are to be published on the website and a link included)		www.mildenhallhu	<u>b.info</u>
Documents attached:		(Please list any appendices.) Appendix A – Draft Public Services Hub Development Brief Appendix B – Draft Public Services Hub Development Brief Consultation report	

1. Key issues and reasons for recommendation(s)

1.1 Background

- 1.1.1 The adopted Forest Heath Core Strategy defines Mildenhall as a market town which provides a broad range of shops, services and facilities that serve the needs of its catchment area. It has a population of approximately 10,315 (2011 Parish Profile) and will be a focus for growth to 2031, which will place greater demand upon public services. Many of the buildings which house public services in Mildenhall are coming to the end of their planned lives, or are in need of major investment.
- 1.1.2 Against this background and the government's 'One Public Estate' initiative, a partnership of public service providers in Mildenhall commissioned Concertus to investigate the business case for development to replace accommodation on a shared basis. The 2014 report which considered the business case examined a number of options involving five sites across Mildenhall in a number of configurations. One of the options, for a single site 'Hub' at Sheldrick Way, was found to be most beneficial in terms of the business case. The 2014 business case (which was updated in 2016) can be read at the weblink set out in the background papers section above.
- 1.1.3 A draft Development Brief was prepared in late 2015 and approved for consultation by the West Suffolk Joint Steering Group at its meeting on 26 January 2016.
- 1.1.4 The draft Development Brief (incorporating post-public consultation amendments) is attached at **Appendix A** of this report. Post public consultation additions and deletions to the document are annotated.

1.2 **<u>Draft Development Brief Consultation and Amendments</u>**

- 1.2.1 The consultation commenced on 7 March and ran until 25 April (just over 7 weeks). A drop-in event was hosted in the afternoon and evening of 6 April at The Pavilion, Recreation Way, Mildenhall. This was very well attended and resulted in an invitation to officers to attend a meeting of residents. Accordingly, officers and the ward Member attended a meeting of a Residents' Group for Wamil Way and neighbouring streets at Mildenhall Cricket Club on the evening of 20 April.
- 1.2.2
 Both consultation events were very well attended and the subsequent responses have been particularly informative and largely constructive. Details of all the replies, together with Officer comments and consequential changes to the Development Brief are included in the Consultation Report which is attached at **Appendix B**.
- 1.2.3 The report identifies two distinct themes arising from the consultation. The first relates to the principle of grouping facilities together on a single site and whether Sheldrick way is the appropriate site and the second relates to concerns and issues arising from the development of the site at Sheldrick Way.
- 1.2.4 The first theme is addressed in the 2014 business case and was considered as part of the Local Plan consultation in August 2015. The local plan consultation

identified support for the principle of bringing public services together on a single site at Sheldrick way, which resulted in the inclusion of the site as part of draft Policy M1 in the Preferred Options Site Allocations Local Plan which is currently at consultation until June 2016.

- 1.2.5 The second matter relates to the implications arising from the proposed development addressed by the Development Brief. A number of consistent and important issues were raised, some of which have resulted in changes or clarification within the document, whereas others related to details which will need to be addressed at a later detailed planning application stage. The key issues were as follows:
 - Concern about additional traffic on Queensway and the junction of Queensway, Kingsway and High Street at Police Station Square;
 - Concern about access for emergency services based at the hub;
 - Need for adequate parking;
 - Conflict between cars and pedestrians in Church Walk;
 - Strong support for improved swimming pool;
 - Need to improve public transport;
 - Wish to protect allotments;
 - Premature ahead of release of RAF Mildenhall.
- 1.2.6 Further issues raised in discussion by residents at the drop-in meeting and the meeting at the cricket club included opinion about the choices for any complementary housing with a strong preference for Option 1 and dislike of Option 3 and a suggestion that the existing car parking in Wamil Way on the site of Option 3 could be retained and utilised for the benefit of residents or church users. There was also concern that the site should be adequate to accommodate any future growth arising as a result of the housing expansion to the west of Mildenhall.
- 1.2.7 Notwithstanding any strategic growth arising from the Local Plan proposals referred to above and currently at consultation, the hub proposal does not propose an overall increase in vehicle movements, rather a redistribution of vehicle movements already taking place within the town. The most significant change will arise from the relocation of the Mildenhall Academy on a single site and this will have implications for vehicle movements particularly along Queensway and the town centre junction at Police Station Square. Revisions have been made to the Development Brief to reflect this, but more detailed work and analysis of the most appropriate solution will be required as a more detailed scheme is developed in association with a planning application. This will also need to take account of any proposals arising from the local Plan process.
- 1.2.8 Adoption of the draft Development Brief as amended post consultation would be a key element in guiding development opportunities in the development of public services for Mildenhall.



PROPOSED PUBLIC SERVICES HUB MILDENHALL

DEVELOPMENT BRIEF COMMITTEE REPORT DRAFT



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Appendix 1: Ecology Survey 2015

Status of Brief

1 INTRODUCTION; PURPOSE AND FORMAT OF THE DEVELOPMENT BRIEF

1.1 INTRODUCTION

The Mildenhall Hub is a project to explore a different vision of the future when it comes to providing public, and voluntary, services – bringing everything together with shared facilities to cut costs and transform the delivery of public services in Mildenhall by creating a single Hub (the Government calls it the One Public Estate). A Hub which is flexible enough to meet the needs of the area, whatever the future holds, and provides the services that local people deserve, including inspirational places for young people to learn.

Located on just one site, instead of the eight shown on the map below, the Mildenhall Hub would have space for education, health, leisure and council services, the Department for Work and Pensions (DWP), voluntary sector groups, a library, police and fire services as well as the potential for other complementary facilities e.g. spaces for potential entrepreneurs to develop their ideas.



Key: 1) Mildenhall Academy (2 sites – Sheldrick Way and Bury Road) 2) Fire Station 3) Swimming Pool 4) Council Offices 5) Library 6) Police Station 7) Dome Leisure Centre

The partnership's preferred option is a single site at Sheldrick Way (site 1 on the map above) providing a single point of access to a range of services. Around a shared public facility (with new council offices, a library, health centre and pre-school) would be various specialist buildings, such as a school and new leisure centre. The leisure centre would provide a larger swimming pool, fitness suite and sports hall, along with a new learner pool, studio spaces and an artificial pitch, alongside new grass pitches, all shared with the school.

Potential Benefits:

• improve the quality of facilities, particularly those for post-11 education;

- reduce the equivalent built elements of the existing public estate by around 5000 m2 (square metres) or 20%, even allowing for an increase in the current range of facilities;
- include over 3000m2 of shared internal space and shared meeting spaces;
- reduce the running costs of the public estate by over 50% (or £20 million) over 25 years;
- relocate services from eight sites down to one easily accessible location for customers, close to the town centre;
- provide scope for public services to expand in the future, if demand for them grows (including flexibility to deal with any scenario for the future of RAF Mildenhall);
- release more than five existing public sector sites for housing, retail, employment or other community uses, one in a prime town centre location and another close to the A11
- provide a flexible environment for virtually any model of service delivery in the future, with strong community ownership
- house a shared 'Hub Host' team in a single shared reception area who can deal with all first contacts with visitors; and
- integrate ICT systems.

You can find out more information about the Hub at its website: www.mildenhallhub.info

Now, through public consultation, the partnership is looking at how a Hub could be delivered at Sheldrick Way. The partners recognise that developing the Hub will not be without its challenges, and will have an impact on local residents. This Development Brief looks at the issues which will need to be addressed and the opportunities, both within the immediate locality and wider area.

1.2 PURPOSE OF THIS DEVELOPMENT BRIEF

Mildenhall is defined as a market town in the adopted Forest Heath Core Strategy and provides a broad range of shops, services and facilities that serve the needs of its catchment area. It has a population of approximately 10,315 (1) and will be a focus for growth to 2031.

Many of the buildings housing public services in Mildenhall are either coming to the end of their planned lives, or require major investment. Any growth within the town will put an extra demand on these facilities. As explained in section 1.1 there is the potential to bring together a number of public services on to one site in order to create a single 'hub'. This would help reduce running costs and improve public access.

Consultation undertaken in August 2015 identified support for the principle of bringing public services together on a single site at Sheldrick Way.

It is proposed to redevelop the school site at Sheldrick Way to provide a single location in Mildenhall for the provision of community services, including education. The adopted West Suffolk Local Plan document (2) sets out the circumstances in which a Development Brief may be required as follows:

Policy CM4

Exceptionally a Development Brief will be required for a proposal which is justified by the Local Planning Authority as:

- i. being of a size; and/or
- ii. in a location; and/or
- iii. proposing a mix of uses; and/or
- iv. of significant local interest such as to make this necessary.

It has been determined that these circumstances apply in this case.

Forest Heath District Council is one of the key partners in the development proposals as well as being the Local Planning Authority. Although the policies of the Council in respect of both of these functions may be closely aligned probity requires that the processes in relation to each role are separated. A Business Case was prepared for the partners in the development proposals (see Section 2) and this set out potential development parameters for the site at Sheldrick Way. The Development Brief is a requirement of the Council as Local Planning Authority and although it may draw on studies and data provided in the Business Case it is not a progression of that document.

The Local Plan Core Strategy sets out the general principles for design quality and sustainable development. A Development Brief is site specific and provides guidance on how these principles should be put in to practice. In addition it should seek to resolve planning issues and constraints in order to facilitate subsequent delivery.

The purpose of this Development Brief is to:

- set out clearly the Local Planning Authority's vision for the future use and development of the Brief site
- give greater clarity to development partners and the local community as to an appropriate form and scale of development
- establish the broad principles for access, movement, landscape, drainage,
- where necessary it will add further guidance to relevant planning policies
- proved a focus for public involvement in the development of the site prior to the consideration of any detailed planning applications

1.3 PLANNING POLICY REQUIREMENTS FOR DEVELOPMENT BRIEFS

FHDC Core Strategy: Policy DM4

The Development Brief shall have been through the agreed process of consultation and approved prior to the determination of a planning application. Development Briefs should accord with Policy DM2 and with any relevant design guidance, Supplementary Planning Guidance/Documents or DPDs, and other development guidance current at the time the scheme is being prepared.

Where appropriate, the Development Brief will include an analysis of site conditions, consultation feedback and identification of the key design issues and will identify:

- a. the mix of housing and affordable housing provision for a site (or details of unit size and mix for employment sites) and the density of housing across the site;
- b. the mix of uses to be provided on a site, including the potential for areas to have multiple uses;
- c. the social and physical infrastructure needed to serve the development including open space and play/recreation provision;
- d. major landscaping and structural planting necessary so the development can be absorbed into the landscape and local biodiversity;
- e. details of the manner in which any existing and proposed wildlife, landscape or historic features will be incorporated and where possible enhanced within development proposals;
- f. provision for safe and attractive footpaths and cycle linkages to be kept, or created, to link the new development into nearby areas. (In particular, links should be created to district centres, including access to all workplaces, shops, and community facilities, and give access where achievable to the surrounding countryside);
- g. details of vehicular movement, parking and public transport linkages;

- h. details of phasing, funding release stages and delivery of social and physical infrastructure;
- i. details of materials, design features and specific design guidelines, such as height, layout, density, mix of uses, etc, for buildings and other townscape features in order to achieve local distinctiveness;
- j. details of sustainable design and construction measures and energy efficiency measures to be incorporated;
- k. details of the manner in which buildings and infrastructure, including blue corridors (areas designated for the channelling of overland flows of water away from property and key infrastructure), will be designed to address climate change risks (such as extreme temperatures, flash flooding, ground heave etc); and
- I. measures to promote sustainable living patterns, including reducing the need to travel set out in a Travel Plan.

The Council will promote and encourage all development proposals to deliver high levels of building sustainability in order to avoid expansion of the district's ecological footprint and to mitigate and adapt against climate change.

All new development proposals will be required to demonstrate how it minimises resource consumption, minimises energy consumption compared to the current national and regional minimum requirements and how it is located and designed to withstand the longer term impacts of climate change...

1.4 FORMAT

The key stages involved in establishing a development brief for the Mildenhall Hub are:

- Setting out the background to the proposed development as, in a number of ways, it is unique
- An appraisal of the environmental features, landscape and townscape character and infrastructure that affects development of the site
- Identifying key planning and design policies that will govern the consideration of a planning application
- Identification of constraints and opportunities that would impact on development
- Establishing a 'vision' for the development in planning terms that also embraces the ambitions
 of the core partners
- A strategy for phasing

The Development Brief sets out to incorporate these stages in a logical order by summarising the Business Case, appraising the context, identifying the criteria against which any proposal is assessed, setting out a vision and establishing the parameters that any set of proposals should seek to reflect in order to meet the terms of the brief.

2 BACKGROUND: THE BUSINESS CASE REPORT

2.1 SUMMARY

The 'One Public Estate' is a government initiative aimed at more efficient use of resources while releasing key sites that might provide an economic stimulus and presenting a more customer focussed and coordinated service. In the context of this initiative a partnership of public service providers in Mildenhall commissioned Concertus to investigate the business case for a development to provide replacement accommodation on a shared basis. A report (reference 13-0512) was published in December 2014. The Business Case sought to establish the feasibility of the concept for either single site or split site options for the provision of community services. As well as the financial aspects the Business Case investigated the operational and space requirements of the partners and the impact of the concept on users. It is a wide-ranging and detailed report and it covered many aspects of the concept and how it might be implemented including site options and constraints, sustainability, landscape and visual impact and economic impact.

As stated in 1.1 above this development brief draws on studies and data contained within the Business Case where it is helpful to do so but in most cases it will avoid repeating information already presented in that report other than in summary format such as may be necessary to inform the development brief.

2.2 SITE OPTIONS

Thirteen options were considered involving five sites across Mildenhall in a range of development configurations. Option 2 – a single site 'Hub' at Sheldrick Way - was found to be the most beneficial in the terms of the business case. It is proposed that a hub at this location could accommodate:

- Forest Heath District Council Offices
- A Suffolk County Council staff base
- Leisure and Sports facilities (including swimming pool)
- Citizens Advice Bureau
- Offices for the NHS and DWP
- Health Centre
- Police and Fire Service facilities
- All of Mildenhall's post-11 education
- Some of Mildenhall's primary and pre-school provision

However Option 3, in which the existing buildings at Sheldrick Way are retained as the 6th form college building, is dismissed by the 2014 Business Case as 'not viable' for the following reasons:

- The existing building limits the opportunities to open up a connection to Wamil Way and the town centre beyond
- The building's position limits the opportunities of creating a coherent and linked external landscape
- A new building would have better connections to the playing fields
- Reuse of the building for other partners needs would result in a compromised design

Wamil Way was the original access for this building so re-orienting the access should not present overriding difficulties and this study finds no prevailing problems with creating a coherent external landscape or accessing other new buildings from Wamil Way on foot or bicycle. The 6th form college students do not use the playing fields so providing a strong link between the two is not necessary and if the existing use is retained then concerns over re-use and refurbishment do not arise. Further

investigation is recommended as creating an external area of controlled safeguarding may be problematic if this is a requirement. The Premises Manager advises that the existing building at Sheldrick Way has been refurbished and is suitable for its present use and that, for financial reasons, removal or change of use is not a viable option, which was not a known factor in the 2014 Business Case. The needs and aspirations of the other public sector partners have also evolved since the initial thinking of the Business Case, and there will be new space requirements and operational concepts in the final Business Case in 2016. Therefore this development brief proceeds on the basis outlined in Option 3 of the Business Case. It should also be noted that the 2014 Business Case included options for a split-site hub including retention of the existing building at Sheldrick Way.

2.3 ADDITIONAL USES

In addition the Business Case raised the possibility of additional uses at the site including:

- Complementary housing (e.g, special needs or key worker housing)
- Open market residential development
- Employment e.g. incubation units in the hub
- Continuance and/or extension of allotments

Although not core to the proposals these aspects could have a significant impact on the proposals themselves.

 m^2

2.4 INITIAL PROVIDER REQUIREMENTS

Work on the 2016 update to the original Business Case report provides the following data for service providers in terms of their current estimate of gross internal floor area requirements for any new buildings in the first phase of the Hub:

	m²
Sixth Form Building	no change to existing building
Education (post 11 only)	8,642
Leisure Centre	4,156
Other Hub uses and shared spaces/infrastructure	3,254
	16,052

The data is provided in this document for indicative purposes only and may be revised later as requirements change and designs evolve. The intention would also be to design the Hub site so that facilities can be extended within its curtilage as the needs of the town change (including the addition of a primary school, which is not included in the data above).

As well as space requirements the partners have operational requirements. One such requirement is safeguarding for school children which is likely to necessitate a separation of entrances and facilities to some extent. These requirements are fully set out in the Business Case and the Development Brief may refer back to that document for these parameters where they affect the planning of the site.

3 SITE CONTEXT AND ANALYSIS

3.1 SITE LOCATION AND DESCRIPTION

3.1.1 Location and Context:

From its historic core with medieval origins (and settlements dating back to the Bronze Age) Mildenhall grew substantially in the 19th century and to the north and east in the second half of the 20th century with London overspill development and is now home to more than 20,000 residents. To the north-west is the Mildenhall Airfield and its USAF base which presents as a sprawling development of large scale industrial buildings and aircraft extending over some 400ha.

The preferred site for the Mildenhall Community Services Hub is centred on the existing Mildenhall Academy 6th Form College on the west side of the market town. Although the site borders, and includes, open countryside on the western edge of Mildenhall, it is still relatively close to the historic town centre which is within 10 minutes walking distance.

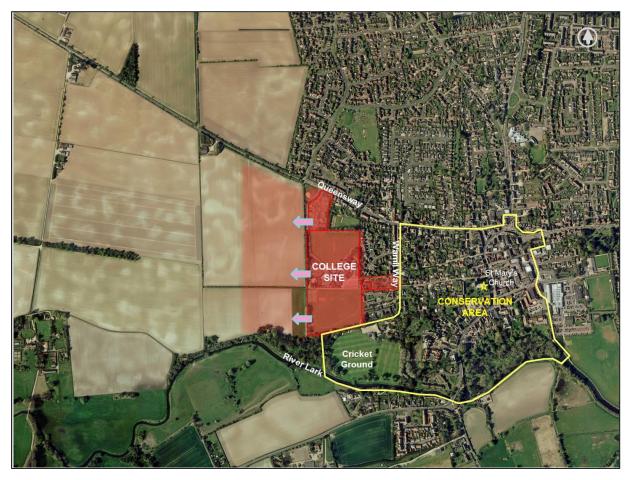


Figure 3.1: Site - Location

Agricultural land to the west is currently the subject of consultation for allocation for residential development but a community services hub development would also incorporate land to the west of the existing settlement boundary and this has been included in proposals for consultation.

3.1.2 Site Description:

The 6th Form College occupies a site of some 6.4 ha and represents a substantial part of the proposed site. The College comprises a central block of buildings, arranged at 45 degrees to the site's boundaries and the surrounding field pattern, with playing fields to the north and south. The College buildings are mostly single storey brick buildings although there is one element that is 2 storeys. Those parts with pitched pantile roofs date from 1939 but there are also numerous flat-roofed extensions which are of more recent date. The college is served by a car park on the north-east side of the buildings and this is accessed by a long service road, Sheldrick Way, accessed from Queensway. There is a small grounds maintenance depot (0.09 ha), now disused, near the eastern boundary and to the north boundary adjacent the main entrance are the well-used Sheldrick Way Allotments extending to 1.1ha. The southern boundary is defined by a bridleway, Wamil Walk, with a cricket ground, a wooded area and the River Lark beyond. The eastern boundary is defined by existing housing being all single storey, including detached bungalows, but there is also a connection, a former vehicular school entrance and now the location of the pre-school, through to Wamil Way. To the north is a small-holding with private rear gardens beyond, and an access through to Queensway / West Row Road.



Figure 3.2: Site - current uses

To the west the flat, arable land is divided by rectangular field patterns occasionally defined by mixed native hedgerows and bounded to the south by mature trees associated with the river valley slopes and Wamil Walk. On the western boundary of the College a row of trees has, in places, grown out of a young mixed native hedgerow, effectively marking the edge of the settlement and visually containing the college. The trees are young-mature and of variable quality being closely spaced and dominated in parts by older poplar.

3.2 OWNERSHIP

All of the land under consideration for a community services hub / campus, including the existing College and its playing fields, grounds depot, the allotments, the preschool and agricultural land immediately to the west is within the ownership of the County Council. In addition, the freehold of a former care home at the south end of Wamil Way known as Wamil Court, now closed, is also in the ownership of the County Council. Complementary housing has been proposed in association with the hub development and the site at Wamil Court, which is to be redeveloped in 2016, could provide a separate point of access (if this were to be the chosen option – see section 6.4). The fact that all of the relevant land parcels are in the single ownership of one of the development partners, albeit subject to variety of lease agreements, allows considerable flexibility in determining the disposition and boundaries of the proposed development. In particular, the relationship between the hub site and proposed residential development to the west can be determined by the physical / design requirements of a hub/ campus rather than the sometimes arbitrary configurations of land ownership. Obviously this should have close regard to the requirements of both Local Plan policies and estate management considerations which are in accord in seeking an efficient use of land.

3.3 LANDSCAPE CHARACTER

Mildenhall is situated at the western end of the Breckland where it meets the Fens. The land immediately to the west of the town is of an intermediate character and is described as the 'Settled Chalklands' in the Suffolk Landscape Character map. Although flat and topographically similar to the fenlands further to the west it is distinguished from them by being free draining, a quality that encouraged early and more dense settlement.

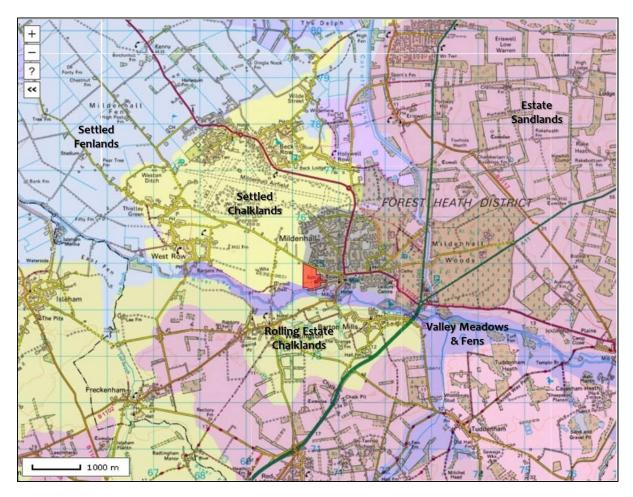


Figure 3.3: Landscape Character

"Many of these settlements have formed the basis for later expansion...The result has been growth in the number of dwellings, especially bungalows."

There is limited tree cover and the open nature of the landscape means that landmarks, notably St Mary's church tower, can be visible over a large area. Apart from the market town of Mildenhall however the other dominant, though less positive, feature is the airbase. Moreover it is the case that, given the constraints on other land, it is highly likely that the main thrust of the urban expansion of Mildenhall will be to the west and this Brief proceeds on the assumption that this will come to fruition, if not in the current Local Plan period then in all likelihood in the following one. Site allocation options are under consideration in the current Local Plan period and fields to the west of Mildenhall could accommodate over 1,000 dwellings as part of this process. The site proposed for the community services hub would then no longer be at the edge of the settlement with views to and from open countryside but would be enclosed by urban development, although this may include strategic amenity space. This would also have implications for the landscape character and the way in which it might affect the design of the hub. Views to the church tower for example would become limited to the eastern fringe of new residential areas or particular vantage points at a greater distance. In this context however the Conservation Area Appraisal undertaken in 2010 states:

"The 160ft high church tower is a prominent landmark in the flat fen landscape around the town. There are dramatic views across the fen of the tower from Beck Row and Barton Mills"

In neither of the specific cases mentioned (Beck Row to the north-west, the other side of the airfield, and Barton Mills to the south) would development on this site potentially interrupt views from these viewpoints.

Topographically all of the land comprising the proposed development site is almost flat and low lying with a gentle slope to the south from 10m AOD to 5m AOD similar to the surrounding land which sits as a level terrace above the narrow valley of the River Lark to the south.

3.4 ARCHAEOLOGY AND CULTURAL HERITAGE

There are no Scheduled Ancient Monuments, listed buildings, registered parks and gardens or historic battlefields within, or in the immediate vicinity of, the site however the remains of a dovecote are listed, uncategorized, and are located at TL 70834 74493 to the south-east of Wamil Way and approximately 100m distant from the site entrance at Wamil Way. The Mildenhall Conservation Area bounds parts of the site on the west (Wamil Way) and the south (Wamil Walk).

The Suffolk Landscape Character study explains why the 'Settled Chalklands' with relatively dry and easily worked soils, were attractive to earlier settlers. The location of this site, overlooking the river Lark, added to its attractions and the Conservation Area Appraisal for Mildenhall states:

"There is evidence of continuous human settlement in the vicinity from the earliest period of human development...There is evidence of extensive Roman occupation, most notably the Mildenhall Treasure..."

The site has not been subject to previous systematic archaeological investigation however Iron Age, Roman and medieval finds have been made with metal detectors in the vicinity. The County Archaeological Service states:

"The site ... has high potential for the discovery of important and hitherto unknown heritage assets of archaeological interest..."

In response to an earlier school redevelopment proposal in 2012 (which did not proceed) the Archaeological Service required a field-walking survey, geophysical survey and linear trenched evaluation to enable the archaeological resource to be accurately assessed, in quality and extent.

3.5 ECOLOGY

There are no nationally or locally designated sites of ecological value in or in the vicinity of the site. The site is just beyond the 1.5km distance SSSI Impact Zone contour from the Rex Graham reserve east of Mildenhall. Deciduous woodland to the south side of Wamil Walk is recorded in the National Inventory of Woodland and Trees and this extends to the small area of woodland north of Wamil Walk around grid reference TL70327444.

In June 2014 a desktop Protected Species Assessment has been undertaken by the County Natural Environment Ecology Team with the following results:

European Protected Species within 2 km	BAP Species within 2 km	Comment for further surveys
Common Pipistrelle; Otter; Unidentified bats	Barn Owl; Water Vole; Common Lizard; Brown Hare	Check building for bats; check grounds for reptile habitat; check grounds for badger activity

It should be noted that the validity of this study is considered to have expired in September 2014.

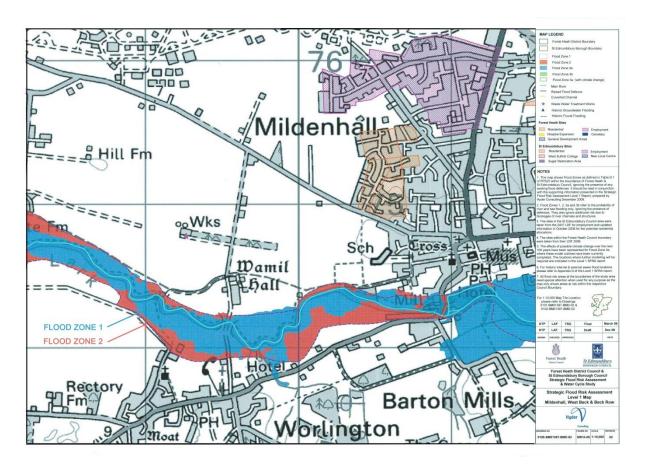
In August 2015 a walkover habitat survey of the proposed residential allocation sites, which includes land to the west of the existing school, was undertaken by Suffolk Wildlife Trust. Overall the sites were found to have a 'medium' biodiversity value. The results of this study are in Appendix 1



Figure 3.4: Habitats

3.6 FLOOD RISK

Wamil Walk marks the shoulder of the river valley and the northern edge of Flood Zones 2 and 3. The site is north of this and sits within Flood Zone 1 where there is a less than 1:1,000 annual probability of river flooding and all uses of land are considered appropriate.



3.7 VISUAL APPRAISAL

A visual appraisal was carried out in July 2014 for the purposes of the Business Case. It found that: "The site itself is of high visual quality due to the combination of low density and low rise buildings, green spaces and the extent of mature vegetation framing and screening views... The landscape setting of the site is of a medium-high visual quality to the north and east... To the south, over the semi-natural valley landscape, and west, over the rural agricultural landscape, the overall landscape setting is of a high visual quality."

It also found that the site had a medium-high visual sensitivity and that owing to its urban fringe location and proximity to housing and the public footpath network it is visible from a number of nearby viewpoints although existing mature vegetation lessens visibility, particularly in summer. It adds:

"Development of the site would therefore have a visually significant effect but not necessarily a detrimental one depending on the scale of the built development and the detailed design of the layout. It will be important for any layout to retain views of the Church tower from the west and maintain the vegetated nature of the settlement edge on this elevation. The limited nature of views into the site from distant viewpoints underlines how important boundary vegetation is for visual screening."

Photographs below, taken in October 2015, show views from a number of points west of Mildenhall looking east towards the site of the proposed hub and new housing areas (Views 1-3). Clearly the views will be altered dramatically. The number of visual receptors and their sensitivity would be increased as there will be many dwellings and associated viewpoints but at the same time dwellings would block views from further east and the context of the views would also be different such that a more urban scene would not be out of place. The new housing areas are also likely to require some strategic open space, possibly in the foreground of View 2 (with playing fields in the middle distance) so that this view may be altered the least.



VIEW 1



VIEW 2



VIEW 3



VIEW 4



VIEW 5:



VIEWPOINT LOCATIONS



VIEW 6: entrance from Wamil Way



VIEW 7: Academy car park

3.7 UTILITIES

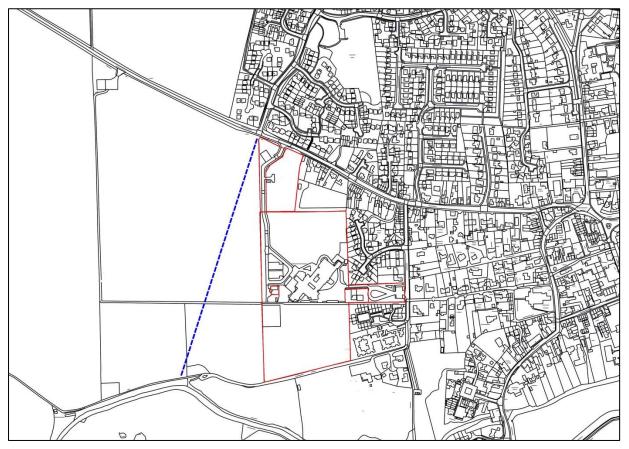


Figure 3.5: Utilities

4 PLANNING POLICY FRAMEWORK PLANNING POLICY FRAMEWORK

4.1 INTRODUCTION

The way in which land is developed and used is subject to a hierarchy of planning policy and guidance with local policy needing to be in accordance with an overarching national policy. Proposals for development at Sheldrick Way will need to comply with new and updated planning policy as it emerges.

4.2 NATIONAL PLANNING POLICY FRAMEWORK

The National Planning Policy Framework (NPPF) was published by the government in March 2012. It introduced a presumption in favour of sustainable development and requires local planning authorities to seek positive opportunities to meet the development needs of their area. It also underlines the importance of design to the built environment and high quality, inclusive design is seen as integral to the concept of sustainable development, indivisible from good planning and should contribute positively to making places better for people.



4.3 LOCAL PLAN CORE STRATEGY (adopted May 2010)

The Core Strategy provides the overall strategic vision for the future of Forest Heath to 2026. The adopted plan was the subject of a successful High Court challenge and policy CS7 (Overall Housing Growth) was quashed resulting in a Single Issue Review and amendments to policies CS1, CS7 and CS13.

The Core Strategy includes the following vision statements:

Vision 1 – Forest Heath

- Green links along the river Lark will have been enhanced for people and for their biodiversity.
- The need to adapt to climate change and to reduce carbon emissions will have influenced the
 location and design of development, including the recreation of habitats. Low energy
 buildings will be commonplace and renewable energy generation will have increased. The
 need for sustainability will encourage the use of alternative modes of transport.
- Schools will be well integrated into the community.

Vision 3 - Mildenhall

- New development will have enhanced the appearance, character and function of the town and aided regeneration, while ensuring the needs of the community are met.
- Additional recreational, open space and community services and facilities will be provided to serve local needs.

The Core Strategy also provides spatial objectives, including: Spatial Objective ENV 2



To guide changes in our built and natural environment in a way which mitigates and takes
proper account of climate change, particularly minimising carbon emissions from new
development and transport, and the risk of flooding. Water efficiency will be encouraged.

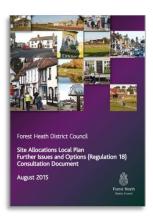
Spatial Objective ENV 4

 To ensure that all new development exhibits a high standard of design and architectural quality that respects and enhances the distinctive landscapes and townscapes of Forest Heath's towns and villages.

These vision statements and spatial objectives are expanded upon further in Policy CS4 which promotes sustainable construction and Policy CS 5 which requires high quality design that reinforces local distinctiveness.

4.4 SITE ALLOCATIONS LOCAL PLAN DOCUMENT

Consultation on the Site Allocations Local Plan Document was completed in October 2015. It identifies site M19 extending to 82 ha. to the west of Mildenhall which is described as Grade 2 agricultural land that is relatively sustainable and unconstrained as a site that could accommodate an extension of the urban area for residential use with the potential for 10 ha. of the available land being allocated for the Mildenhall public services 'hub'. The document also identifies the potential for a district heating network, future proofed to serve any nearby new housing, to be provided as part of such a development.



3.5 JOINT DEVELOPMENT MANAGEMENT POLICIES DOCUMENT (adopted February 2015)

While the Core Strategy provides the overarching vision the JDMPD provides locally based management policies for use in day-to-day planning decisions. It re-iterates the Presumption in Favour of Sustainable Development (Policy DM1) as required and it provides an outline of what should be included in Development Briefs (see Section 1: Purpose and Format of the Development Brief). Off particular relevance to proposals for a Community Campus / Hub are:

Policy DM2 - Creating Places

This emphasises the need to maintain or create a sense of place including having regard to landscape/townscape character and views into and out of a Conservation Area. Development should be of an appropriate scale, density and massing; incorporate sustainable design and construction



measures; not adversely affect ecological interests; make for safe environments; and facilitate access for all with specific regard to sustainable forms of transport.

Policy DM4 - Development Briefs

See section 1.2

Policy DM6 - Flooding and Sustainable Drainage

Sustainable Drainage is a particular issue in Forest Heath as some 20% of the District is liable to flooding. Land to the west of the Sheldrick Way site is within the Ouse Washes Habitat Creation Project. The site is within the Lark river catchment and can therefore impact on the Ouse Washes downstream. Policy DM6 requires that a scheme for sustainable drainage and flood management is submitted as part of the application and the policy makes reference to measures such as rainwater harvesting and greywater recycling.

Policy DM7 - Sustainable Design and Construction

"All new non-residential developments over 1000 square metres will be required to achieve the BREEAM Excellent standard or equivalent".

This requirement can be waived however if there are constraints inherent within the site preventing one or mandatory credits from being achieved or if the cost of attaining this standard can be demonstrated to compromise the viability of the scheme.

Policy DM13 – Landscape Features

"All new development should be informed by, and be sympathetic to, the character of the landscape. ...All development proposals should demonstrate that their location, scale, design and materials will protect, and where possible enhance, the character of the landscape, including the setting of settlements, the significance of gaps between them and the nocturnal character of the landscape."

Policy DM17 - Conservation Areas

The site at Sheldrick Way is not in a Conservation Area but Wamil Way is and this is close to the site boundary. The tower of St Mary's Church, less than 300m distance, is clearly visible from (and across) the site. The policy requires that

"views into, through and out of a Conservation Area are preserved or enhanced.

Policy DM20 – Archaeology

This policy advises that development that has a material adverse effect on sites of archaeological importance will not be acceptable however there is no overriding case against development on sites of archaeological interest subject to certain conditions.

Policy DM22 - Residential Design

DM22 provides advice on requirements for design aspects of residential development.

Policy DM41 – Community Facilities and Services

"The provision and enhancement of community services will be permitted where they contribute to the quality of community life and the maintenance of sustainable communities...."

Policy DM43 - Leisure and Cultural Facilities

"Planning applications for new leisure or cultural facilities ...will be permitted provided that:

- a) The proposals are connected to and associated with existing facilities or located at a site that relates well to, (where achievable within or on the edge of), a defined Settlement and can be made readily accessible to adequate public transport, cycling and walking links for the benefit of non-car users.
- b) There would be no unacceptable impacts on the character, appearance or amenities of the area and the design is of a standard acceptable to the local planning authority.
- c) Vehicle access and on-site vehicle parking is to an appropriate standard..."

Policy DM44 - Rights of Way

A number of existing rights of way border the site or cross land to the west of the site that may be incorporated.

"Development which would adversely affect the character of, or result in the loss of existing or proposed rights of way, will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe and convenient for public use... Improvements to such rights of way will be sought in association with new development to enable new or improved links to be created within the settlement, between settlements, and or providing access to the countryside or green infrastructure sites as appropriate and to achieve the objectives of the Suffolk Rights of Way Improvement Plan."

Policy DM45 – Transport Assessments and Travel Plans

"Where a transport assessment and / or travel plan does <u>not</u> demonstrate that the travel impacts arising from the development will be satisfactorily mitigated or that adequate measures are in place to promote the use of more sustainable modes of transport then planning permission will not be granted."

Policy DM46 - Parking Standards

"... Proposals for new mixed-use sites will be expected to minimise the provision of car parking where achievable, for example by providing shared use parking, and/or car pooling as part of a Travel Plan."

5 DEVELOPMENT VISION AND OBJECTIVES

5.1 VISION

The core strategy provides statements for the vision that the Council holds for the District and for Mildenhall, including:

FHDC Core Strategy: Vision 1

Forest Heath

...An established network of open spaces and green corridors will enhance and protect the district's natural assets...

The need to adapt to climate change (in particular in managing flood risk) and to reduce carbon emissions, will have influenced the location and design of development, including the recreation of habitats. Low energy buildings will be commonplace and renewable energy generation will have increased. The need for sustainability will encourage the use of alternative modes of transport...

Schools will be well integrated into the community...

The emphasis on protecting and enhancing the intrinsic character and built historic heritage of our villages, towns and the wider environment will be balanced with the benefits of small-scale development to provide affordable housing, local jobs or additional community facilities...

FHDC Core Strategy: Vision 3

Mildenhall

...New development will have enhanced the appearance, character and function of the town and aided regeneration, while ensuring the needs of the community are met...

The Government, the Local Government Association and the public services partners behind the proposed 'hub' also have a vision for the project which is seen to offer multiple benefits. Efficiency and cost savings are significant drivers for the project and the Government envisages that this will also drive growth by releasing land for development. However co-location is considered to offer other benefits for the community. Physical proximity could facilitate access for users of services but could also promote integration to deliver more customer-focussed service provision. The partners' vision incorporates:

- flexibility of buildings to adapt to changes of service needs
- ease of access
- minimal impacts on surrounding areas
- opportunities for community use of shared facilities including sports, education and meeting areas

This vision correlates strongly with planning objectives.

The following vision statement outlines the key planning components and principles for development of a shared services hub at Sheldrick Way. Proposals will be expected to embrace this guidance:

The site of the existing college at Sheldrick Way, together with land to the west of the existing site, will be the location for a new shared community services (public, private and voluntary) 'campus' or 'hub' serving Mildenhall. There would be provision for schools (an academy, a primary school and pre-school) and their sports/playing fields, a leisure centre (to include a 6-lane swimming pool) and local government offices (for the District and County Councils) with space for other public services such as library, emergency services, health, Department of Work and Pensions, and Citizens' Advice. The development will seek to share use of assets where possible and community access to and use of facilities will be encouraged within the constraints of safeguarding considerations. The development should allow for flexibility in demand and adaptability to future uses. It will also offer the potential for small amounts of complementary housing on the site and enterprise space within other buildings.

It will be well connected to the historic heart of the town by a footpath / cycleway utilising Church Walk. It will also be well connected to proposed new residential development and to West Row and provide a convenient through route so that these areas are in turn connected to the town centre. The design of the constituent buildings and their arrangement will principally address access by the pedestrian / cycle route to provide an engaging and welcoming threshold. The primary school will be located and designed to facilitate pedestrian access from the proposed new residential development to the west. Vehicular access to the campus/hub will be from Sheldrick Way and will make good provision for public transport. 'Drop-off' zones should be provided such that they allow a safe onward journey on foot to the primary school and the academy. Car parking should be designed to be discrete and not visually dominant.

The design of the campus/hub and its constituent buildings will be to a high standard such that it becomes a source of civic pride. It will also encourage a sense of ownership by presenting a point of access that is open and inviting. The development will attain a high standard of sustainability by being efficient in its use of land and resources, both in the construction and, particularly, the operational phases. New buildings, as a group, should attain a BREEAM 'Excellent' rating. If there is potential for becoming a net exporter of renewably produced energy it will be exploited.

The new development will sit comfortably in its landscape setting by virtue of scale, massing, composition and detailed design, including materials. It will seek to protect and enhance existing landscape assets such as mature trees. A Sustainable Drainage system will ensure attenuation of storm water and will contribute to the objectives of enhanced water quality and landscape/biodiversity. New landscape interventions will seek to improve amenity for all stakeholders, provide a safe environment and create rich habitats. Views to St Mary's church will be retained and exploited. Taller elements (exceeding 2 storey heights) in the composition of buildings will seek to enhance the skyline by providing additional punctuation or interest but should not diminish the impact of the church spire in important views.

Overall the new campus/hub will be considered to be a major enhancement to both the community services and the overall appearance and functioning of Mildenhall such that it becomes an ever more attractive location place to live and work.

6 KEY DESIGN & PLANNING PRINCIPLES

6.1 ACCESS & MOVEMENT

6.1.1 Vehicular Access and Movement:

The original vehicular access to the school was from Wamil Way but as the school and its traffic grew the limitations of both Wamil Way and is junction with Queensway in terms of visibility and turning movements necessitated the construction of a new access at Sheldrick Way, also serving the allotments. The original vehicular access has been retained as a small, informal parking area and a pedestrian / cycle access to the school. Consultation on this Brief has also identified that it is currently used by residents of Wamil Way and nearby facilities as overflow parking. In addition it currently serves as the sole access to the existing pre-school but, given its constraints, it is considered unsuitable as a vehicular access for the hub site.

The further growth in traffic that would result from the development of a Community Services Hub would in turn place pressure on Sheldrick Way which would be exacerbated by the future growth of the urban area of Mildenhall to the west which would result in increased traffic on Queensway. This has been identified in the Transport Assessment which accompanies the business case and will require further assessment and mitigation at planning application stage.

A solution would be to change the priority of the Sheldrick Way junction as illustrated in Figure 6.1 below. Sheldrick Way could then become the principal access road to and from the new residential area and a potential bus route. The relocated secondary school and new primary school should present their principal and secure point of access, including a drop-off point, directly onto this road. The school(s) will also need to work with students, parents and staff to ensure that Wamil Way is not used as a drop-off. Traffic accessing the car park serving the other parts of the hub would then turn off Sheldrick Way.

It is important that the hub is integrated into the fabric of the townscape of the expanding urban area. The will be a challenge given that there will be no through road and that existing residential development on Wamil Way faces away from the development site. Figure 6.1 indicates that residential development should be present on both sides of Sheldrick Way and this would allow the emphasis of place over movement in accordance with the Manual for Streets. Similarly it is anticipated that there would be active residential frontage on one side of the access road leading to the 6th Form College, Leisure Centre and Hub Offices. The design of the car park and the point of arrival will need to take into account the importance of creating residential amenity in this location to address the street frontage to be developed opposite and existing properties off Wamil Way.

6.1.2 Pedestrian / Cycle Access & Movement

The existing pedestrian / cycle access to the 6th Form College off Wamil Way is a key asset of the site as it leads almost directly to Church Walk which provides a short route through to the town centre. The key visual landmark of the St Mary's Church tower is on this alignment providing a strong visual link between the hub site and the town centre. Consideration will need to be given to improving pedestrian safety across Wamil Way and into Church Walk. The existing site is otherwise entirely enclosed by wire fencing, apart from the vehicular route through Sheldrick Way, although public footpaths run along the south and west boundaries. Other key off site improvements to footpath links will need to be explored, including pedestrian movements at the junction of Queensway and Kingsway at Police Station Square.

The new hub will need to be much more accessible and should link into the existing footpath network at key points. Moreover, as the site is interposed between the town centre and the proposed urban extension to the west it is important that it provides a strong link between the two. As stated in 6.1.1 the integration of the hub site is challenged by the fact that there would be no road through the site and in traffic terms it would be relatively isolated and this underlines the need to ensure good pedestrian and cycle connectivity both into and through the site and particularly east-west. Such links should be direct and legible. The church tower is strong visual link and views to the church along these links should be retained. The hub development could also provide a visual landmark along this route but such a marker should remain visually subservient to the church tower. The east-west link could become a principal part of the pedestrian / cycle network serving the town. A good footpath cycleway link should also be provided to proposed residential development on the north side of West Row Road. A crossing point would be created as part of that development but Figure 6.1 shows how this could be integrated into the hub with a route linking the point of arrival on the site through a bus stop serving the schools entrance area and beyond to residential areas to the north.

Wamil Walk to the south of the site is a popular recreational route with access to the river and cricket ground. This should also be linked into the hub, ideally with a good through route to the town centre and to residential areas to the north, so that the hub and the facilities it offers are knitted into the movement network of the town.

Attention to the needs of all user groups, including mobility impaired, must be integral to design. As well as a attaining a high standard in engineering terms it should provide for a high standard of safety, including lighting, accessibility and amenity, in terms of street furniture and landscaping. The footpath and the cycleway elements should be kept separate where possible.

Cycle parking should be adequate, close to the desired destination (building entrances), covered and well-lit.

6.1.3 Public Transport

Because the hub would not be on a vehicular through route connections with public transport networks becomes problematic. The secondary school in particular will need a good bus route connection Figure 6.1 indicates how this might be achieved. It may be necessary to provide a bus turning area at this location as bus routes may terminate at the school. There should also be good connectivity from the bus stop to the core of the hub.

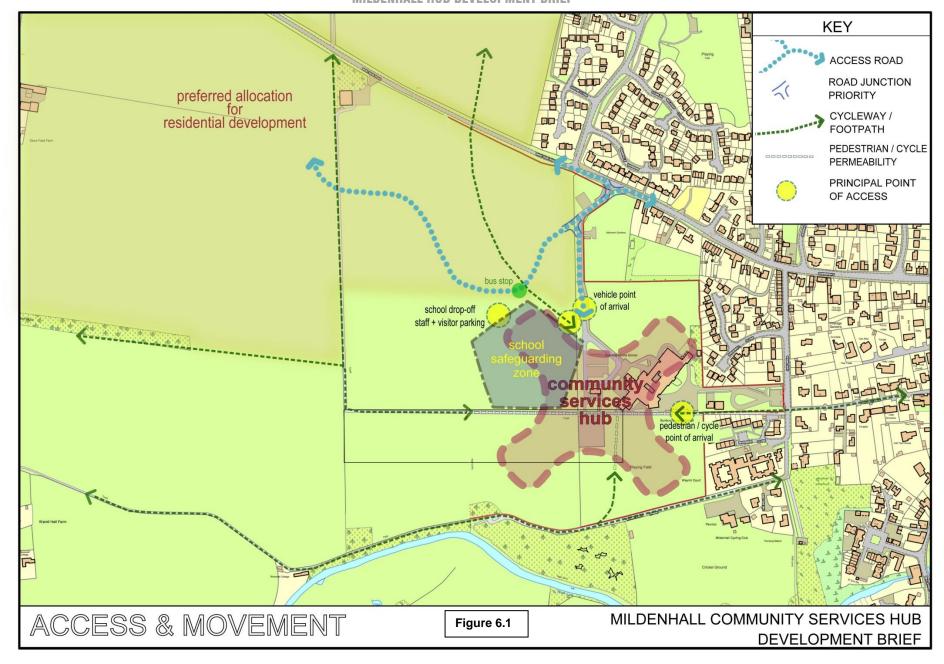
6.1.4 Parking

Parking for the hub should be placed close to the 'Vehicle Point of Arrival' in order to minimise vehicle movements across the site. It should be a facility shared with all user groups in order to maximise efficiency although Fig. 6.1 indicates that there could be a smaller element of separate parking close to the schools entrance area. The existing parking area at the entrance off Wamil Way should not be used to serve the Hub but with careful management it could serve to mitigate any loss of on-street parking on Queensway.

The parking facility may be used by some visitors for a trip to the hub facilities combined with other destinations in the town centre. To what extent this is encouraged or discouraged will be a matter for the management of the parking facility but it is clear that account will need to be taken of this demand in assessing the level of provision.

The development brief requires that parking be provided in accordance with Suffolk Parking Standards as they may be interpreted by the Highways Authority. This would be based on user requirements at the time of an application but it is recommended that flexibility be built in to the design. This could be in the form of an 'overspill' parking area and such an overspill area may have other uses, such as

tennis courts associated with the leisure centre and/or schools. However it is also the case that user requirements based at the hub may develop over time resulting in long term changes in demand for parking. This could result in an increase or decrease in the requirement for parking but this could mean that an 'overspill' area becomes permanently unavailable for other uses. The development brief recommends that the desired flexibility be found in the demand for parking associated with other trips to the town centre. The design of the hub could allow for maximizing provision for this purpose such that parking at the hub is seen as a car park serving the town centre. If demand for parking by the hub partners was to increase over time then use by visitors to the town centre could be increasingly restricted and this element of the provision found elsewhere off site.



6.2 LANDSCAPE

6.2.2 Existing Trees

Existing trees on the site boundaries and on the access from Wamil Way should be retained <u>and the tree belt potentially strengthened</u>.

There is also a line of existing trees running north-south on the edge of the existing school boundary. Most of these trees are the result of a double row boundary hedge not being maintained such that tree species included in the hedge mix have been allowed to grow out. Generally these are very close to each other, usually less than 2m apart, and consequently etiolated and of poor form as individual specimens. There are also a number of larger, more mature white poplar trees that appear to have predated the hedge planting. The trees are of variable form and some may have structural weaknesses however, although not a long lived species, the trees are young mature and would have a 'safe useful life expectancy' in excess of 20 years. The design of the hub complex could allow for the retention of a number of these trees however their importance, in landscape or arboricultural terms, is not considered such that their retention should determine layout or design. In ecological terms they are considered to be of local value so detailed design should seek to retain them where practical otherwise their loss would need to be mitigated. The development would offer opportunities to enhance ecological value overall in mitigation (see section 7.5) and such opportunities should be exploited. Consequently they are not indicated on Figure 6.2.

6.2.1 Landscape Setting:

The visual appraisal undertaken for the Business Case considers that it is important to maintain the vegetated nature of the settlement edge as this helps screen and soften medium to long distance views to the urban area, although at the same time it also considers that it is important to maintain views of the church tower. To achieve the desirable balance the school boundary planting (see fig. 6.2) should aim provide screening at a lower level with shrubby species (up to 2m) but tree planting should allow filtered views through. If the school boundary is adjacent open countryside and arable fields then maintaining the field pattern, by setting out the boundary in a straight line that is parallel to field pattern (north-south), would also help to integrate the school playing fields into its wider setting.

6.2.3 Point of Arrival / Gateway Landscaping

Two key points of arrival are indicated on Figure 6.2. Landscape treatment here should:

- announce arrival as a 'gateway', perhaps with public art
- incorporate appropriate signs
- provide for meeting / gathering, with seating

6.2.4 Residential Boundary Planting

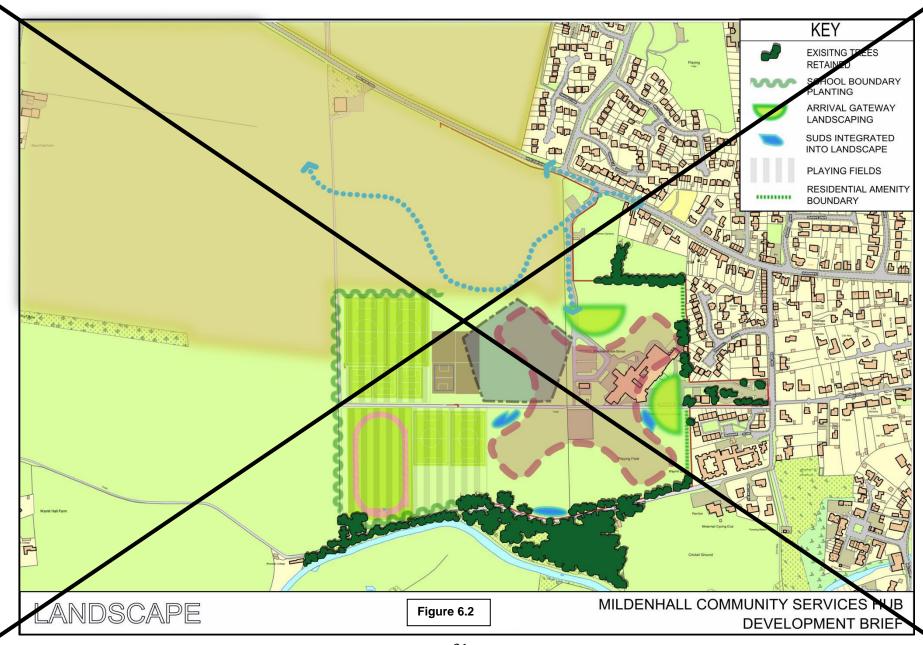
The existing school abuts the rear garden boundaries of residential properties. There is some boundary planting already and this should be retained. In places, particularly adjacent proposed car parking areas, this planting may need to be reinforced to ensure privacy for residents.

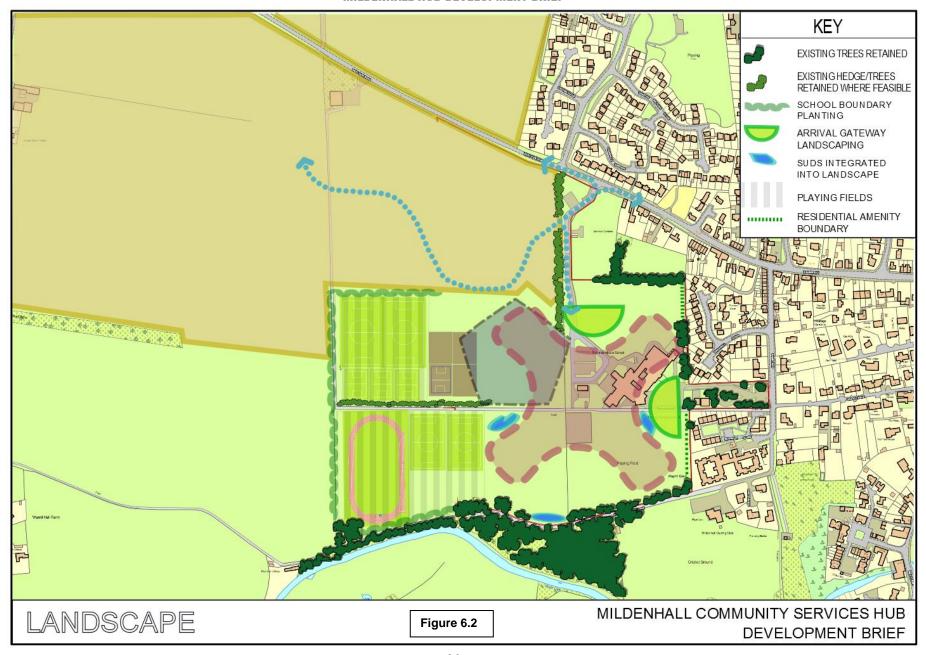
6.2.5 Sustainable Urban Drainage (SUDs) Features

SUDs features should be integrated into the landscaping for the site where they can add to amenity and biodiversity. This may include surface attenuation features such as swales, detention ponds or 'rain gardens'.

6.2.6 Learning Through Landscapes

It is expected that the outdoor areas closely associated with the schools will be designed to provide an outdoor learning resource. This theme can be extended to other parts of the site.





6.3 SCALE & MASSING

6.3.1 Parameters:

The proposed hub will present a challenge architecturally. There is a desire to share physical space within a building complex but at the same time there will be a need to provide a degree of separation and identity for many of the users as well as 'safeguarding' in the case of schools. It is the intention that the development brief allows the necessary degree of flexibility to resolve these issues but at the same time it seeks to set out the broad parameters under which options can be explored in order to provide all key stakeholders with common understanding of the general scale and massing that will describe the development. At the same time detailed solutions will need to allow for potential expansion of facilities within the site to accommodate future growth that can not be ascertained at this stage.

6.3.2 Footprint:

The starting point for the design of the complex of buildings will be the fact that the existing Mildenhall Academy College buildings are to be retained and will continue to provide all necessary accommodation for the 6th form college. The other key elements to be provided for are:

- Schools (secondary school, primary school, pre-school)
- Leisure centre, including a swimming pool
- Public access building/offices for other core partners and associated users

Together with the 6th form college there would be four key user groups occupying distinct elements within the complex. The desire to create proximity to each other for sharing space and facilities while maintaining a degree of distinction suggests an approximate cruciform arrangement as the most logical layout. Such an arrangement has the potential to sit well with other development parameters such as relationship to neighbouring uses, key access points and permeability of the site and has generated the cruciform symbol used in plan illustrations throughout the development brief.

Figure 6.3 indicates how this could be translated to provide an outer limit to the building complex footprint. The Business Case study has provided various figures for partner requirements in terms of floor areas with the higher figures being 23,180 square metres in total (note: this excludes the primary school). Of that total 11,280 sq.m. would be required by the academy of which just under 4,000 sq.m. is existing accommodation in the 6th form college. The cruciform in Fig. 6.3 has an area of 44,000 sq.m. approximately. If all of the development was of 2 storey construction it would occupy just over ¼ of the cruciform (plus the primary school). In practice it would be somewhat more as most of the existing college is single storey but the form shown generally allows a good degree of flexibility for design.

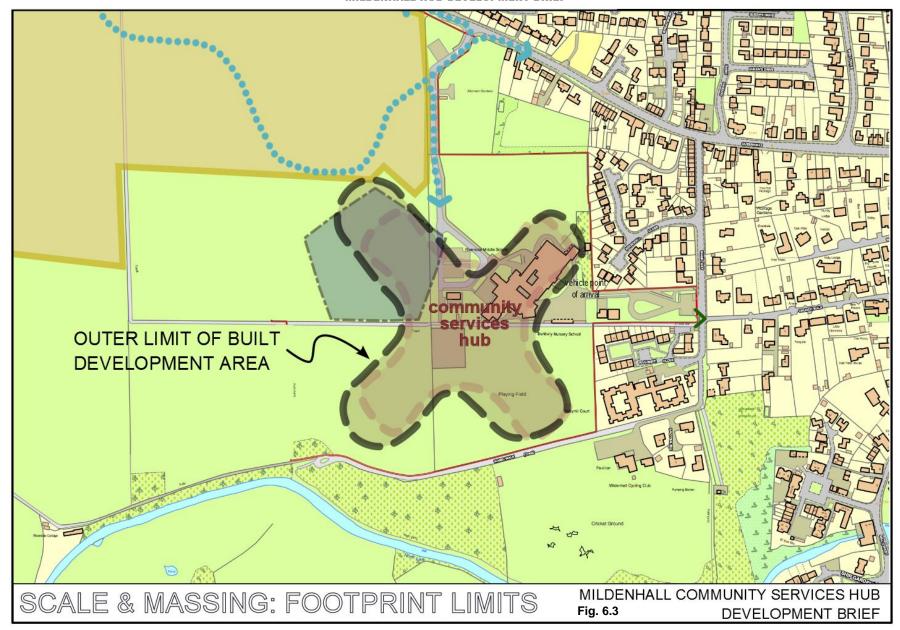
6.3.3 Building Heights:

The existing setting for the site at Sheldrick Way is characterised by low-rise development, being single storey at Wamil Court and Riverside Close in the south-west and 2-storey in Bridewell Close to the west. The major part of the existing college buildings, all of which are to be retained, is single storey also. In addition the visual assessment has drawn attention to the desirability of protecting views to St Mary's church tower. These factors suggest that a low rise development would be most appropriate. The school would need to be of 2-storey height in order to meet EFA (Education Funding Agency) requirements. However Education Funding Agency (EFA) guidance also emphasises efficiency in construction costs and it offers baseline designs that are 3 storeys high. Reducing the storey height can increase the cost of floorspace per square metre therefore a minimum 2 storey building is likely. In visual terms there are also arguments for allowing some elements of the scheme to punctuate the skyline with 3, or possibly 4, storeys but larger blocks of 3 storeys should be subject to visual impact studies. Although presently an 'edge of settlement' site the development brief proceeds on the basis that the setting will change significantly with substantial areas of additional housing on agricultural land to the west. A limited

proportion of higher roof levels could result in an enriched visual environment if a high standard of architectural design is achieved. This would also be appropriate for a Community Services Hub as one or two taller elements would imply a higher order in the functional hierarchy of buildings and 'civic centres' are traditionally imposing buildings. This would add to the legibility of the townscape. Clearly any taller elements would need to be carefully considered to provide a harmonic visual composition when viewed from the west with the church tower in the further distance.

Appropriate proportions for design parameters are considered to be:

- Minimum 75% (as ground built area) of new build should be 2-storey or less with a maximum height to eaves of 8m and a height to top of roof being 11m for flat roofs (with a slope of <15°) or 14m for pitched roofs (with a slope of > 15°)
- Maximum 25% (as ground built area) of new build could be 3-storey or 4-storey with a height to eaves 10m and a height to top of roof being 13m for flat roofs (with a slope of <15⁰) or 16m for pitched roofs (with a slope of > 1



6.4 COMPLEMENTARY HOUSING

The Business Case indicated a potential ambition to incorporate a small amount of 'complementary' housing on the site (that is, housing for rent occupied by key workers or those requiring specialist accommodation who might benefit from proximity to the hub). This could have potential benefits in terms of integrating the hub development into the fabric of the town.

There are three two potential options, partially illustrated in Fig. 6.5 and presented as an either/or scenario.

Option 1 (preferred) would be to site any complementary housing to the north west of the Hub with access from Sheldrick Way. Housing in this area should sit comfortably with the proposed strategic residential development to the west, currently being considered as part of the Forest Heath Local Plan. Although referenced, this is not shown as a specific site in Fig. 6.5 as this would depend on the final layout for the main Hub facilities.

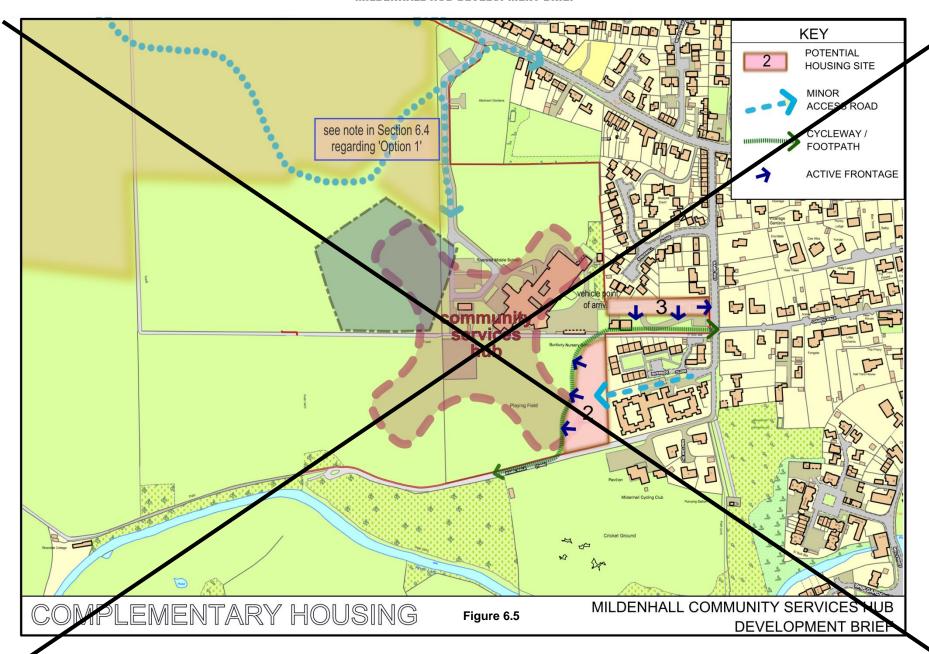
Option 2 (site 2 on Fig. 6.5) is a future but complementary extension to Wamil Court, now closed and awaiting redevelopment. The viability of this option would depend upon the determination of any preceding application for Wamil Court and the outcome of other proposed developments off Wamil Way. However, in theory at least, redevelopment of this site offers the potential to replace rear garden fencing with an active frontage to the hub development. This would help enliven the space on this side of the hub and help integrate it with other uses. If later extended into site '2' to the west side of Riverside Close as shown on Fig. 6.5 the active frontage could be similarly extended to present an active frontage in lieu of the rear garden fencing of Riverside Close. The hub development in turn would need to respond with an attractive and active frontage facing the housing and a pedestrian / cycle route should be created between the two.

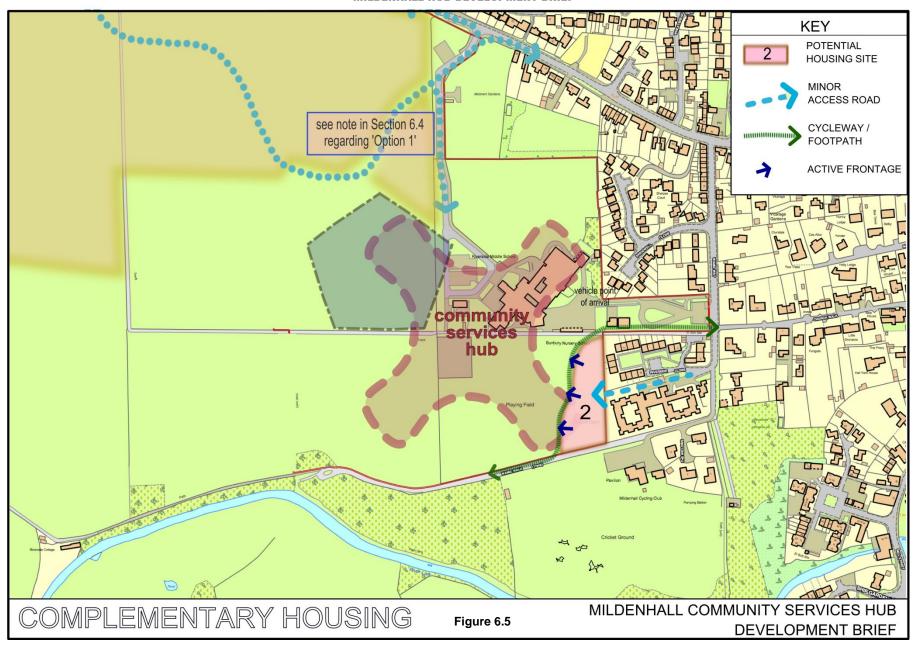
Option 3 (site 3 on Fig. 6.5) offers similar potential to enliven the space with active frontage however development potential here would be limited by existing trees and the shallow depth of possible plots. Existing trees provide considerable amenity to this access and any development would need to be carefully designed so as not to detract from this. A very limited number of well-spaced detached dwellings may be able to achieve this but larger dwellings would probably not be a solution as plot depths may not accommodate them.

Both sites 2 and 3 Site 2 would require vehicular access to be taken from Wamil Way. Any increase in vehicular movements in Wamil Way could be offset by the removal of the existing off-street car parking and relocation of the pre-school to Sheldrick Way. However, this is a matter likely to be examined in more detail through other planning applications in the vicinity which will precede the Hub project.



Fig. 6.4 View to site entrance from Wamil Way





7 SUSTAINABILITY

7.1 CONCEPT

As well as central government policies aimed at reducing carbon emissions, and their expression in the NPPF, the Local Plan Core Strategy Vision and Policy supports a sustainable approach to development.

FHDC Core Strategy: Vision 1

...The need to adapt to climate change (in particular managing flood risk) and to reduce carbon emissions will have influenced the location and design of development, including the re-creation of habitats. Low energy buildings will be commonplace and renewable energy generation will have increased. The need for sustainability will encourage the use of alternative modes of transport...

FHDC Core Strategy: Policy CS4

The Council will promote and encourage all development proposals to deliver high levels of building sustainability in order to avoid expansion of the district's ecological footprint and to mitigate and adapt against climate change.

All new development proposals will be required to demonstrate how it minimises resource consumption, minimises energy consumption compared to the current national and regional minimum requirements and how it is located and designed to withstand the longer term impacts of climate change...

The West Suffolk Joint Development Management Policies Document (DMD) includes the following:

West Suffolk Joint Development Management Policies Document: Policy DM7

All proposals for new development including the re-sue of conversion of existing buildings will be expected to adhere to broad principles of sustainable design and construction and optimise energy efficiency through the use of design, layout, orientation, materials, insulation and construction techniques...

All new non-residential developments over 1000 square metres will be required to achieve the BREEAM Excellent standard or equivalent unless it can be demonstrated that one or more of the following conditions apply:

- It is not possible to meet one or more of the mandatory credits for an Excellent rating
 due to constraints inherent within the site. In this case development will be expected to
 accrue the equivalent number of credits by targeting other issues while achieving an
 overall Very Good rating
- The cost of achieving an Excellent rating can be demonstrated to compromise the viability of the development. In this case applicants will be expected to agree with the Council whether the target should be relaxed, or whether cost savings could be achieved in another aspect of the development...

Fundamentally, the concept of a shared use site is a sustainable approach to public service delivery and would address multiple criteria in assessing sustainability. Inherently there would be a more efficient use of buildings that would therefore embody less materials / energy in construction and ongoing energy consumption would be less for a smaller building. Combining functions on a single site should also act to reduce vehicle trips and contribute to social objectives in sustainability.

The strategy should be to optimise the opportunities presented by the concept. This would include delivering a set of buildings that perform well and the requirement for an overall BREEAM 'Excellent' rating should apply. This would place them in the top 10% of non-domestic new builds and is considered 'best practice'.

BREEAM Rating	% score
OUTSTANDING	85 +
EXCELLENT	70-85
VERY GOOD	55-70
GOOD	45-55
PASS	30-45
UNCLASSIFIED	< 30

BREEAM Guidance confirms that: "it is possible to assess and rate a number of separate but similar buildings, or individual units within a larger building development, within one BREEAM assessment report." [BREEAM UK New Construction non-domestic buildings technical manual 2014, p.14] A BREEAM Assessor should be appointed early in the project at the design stage in order to ensure that opportunities are recognized and taken. A design stage BREEAM Interim Assessment should be required.

The remaining part of this section explores the implications for the development in respect of the principal assessment criteria of setting out to achieve an Excellent rating.

7.2 ENERGY

Energy remains the most significant area for assessing the performance of buildings in relation to BREEAM certification representing 15% of available credits and an Excellent rating requires an Energy Performance Ratio (EPR $_{\rm NC}$) of 0.36 or more. The stated ambition [Business Case 2014] is to provide a building that is a net exporter of energy and this could significantly contribute towards the BREEAM rating. A building's operational phase accounts for 80-90% of energy use through heating, cooling, ventilation, lighting and appliances. [UNEP-SBCI Common Carbon Metric for Measuring Energy Use 2009 BRE Carbon Emissions from non-domestic Buildings 2020 and Beyond]

The Business Case states that:

"The vision for the Mildenhall Hub is that through innovative design and the use of best available technologies the partners can create a development which will satisfy its own energy needs whilst being able to export clean, green heat and power to others in the local community.

The Design features and technologies which could be employed in the Hub include:

- Design Features master planning to secure optimal solar gain in winter and cooling in summer. Very high standards of fabric energy efficiency
- Heat Generation Technologies heat pump or biomass energy centres distributing through a
 heat network to buildings on the site as well as provision for extending the network into the

- local community. Solar thermal could be employed where specific buildings have roof space and hot water demand not satisfied by the heat network
- Power generation technologies solar photovoltaics will be the technology of choice.
 Combined heat and power technology could be used where biomass is the heat energy source of choice.

Thus the vision is for a development that both reduces energy consumption and sources such energy as it needs from low-carbon, renewable technology. Achieving the necessary credits from energy to help towards a BREEAM Excellent rating is likely to require all of the design features and technologies identified, even more so if the ambition of achieving net export of energy is to be realised.

7.2.1 Passive Solar

Passive solar gain can often be the most significant factor in achieving an Excellent rating in energy terms and would help in delivering on the stated ambition for the development to be a net exporter of energy by reducing demand on site. It does not necessarily have significant cost implications as most of the gain would arise from correct orientation of the buildings although it does also require design features such as a thermal collector/heat sink, enhanced insulation, and protection from overheating. The first objective in delivering passive solar gain is to ensure that major fenestration is oriented within a south-facing arc, likely to be biased to the east in order to gain insolation in the early part of the day.

7.2.2 Solar PV

Solar photovoltaics are described in the Business Case as the 'technology of choice'. The proportion of total energy demand that can be met by photovoltaic (PV) generation will ultimately depend on a combination of factors. PV can only address electricity demand and is unlikely to contribute to space and water heating or space cooling. However electricity has been growing as a proportion of energy supply in non-domestic buildings such that it now accounts for more than 60% of delivered energy and more than 80% of carbon emissions (5). Nevertheless, even when using a substantial percentage of available roof area it can usually only meet a proportion of total energy demand. The orientation / pitch of PV cells can be of relatively marginal significance within certain parameters (i.e. within 30 degrees of due south and a pitch of 10 to 40 degrees).

7.2.3 Solar Thermal

Direct thermal solar units are approximately three times more efficient than PV at converting solar radiation to usable energy for heating and should form part of the energy mix to provide hot water.

7.2.4 Ground Source Heat Pumps

Ground Source Heat could make a useful contribution to space heating given the potential collection space available as represented by playing fields and the potential of the nearby River Lark. A football pitch extending to some 0.6 ha could deliver approximately 100kWh of energy however advice should be sought on the possible adverse effect on frost-free days (and therefore availability for playing).

7.2.5 Combined Heat and Power / District Heating Network

A combined heat and power (CHP) plant could deliver a substantial proportion of the energy needs of the hub and there may be potential on the Sheldrick Way site. CHP can be run on fossil or biomass fuels however BREEAM ratings make reference to CO2 emissions and non-fossil fuels would therefore need to be sourced. Alternative primary energy sources for CHP plant can include biomass (possibly waste streams) and methane from waste.

A CHP plant can also be linked to a District Heating Network. There is no definition of what a District Heating Network is (5). They can vary significantly in terms of the base source of energy and the scale and technologies employed in distribution but essentially they comprise shared use of a heat source distributed through a network of insulated pipes. Most networks in the UK are relatively small and powered by gas. They have the advantage of being relatively efficient but much of the efficiency

savings can be lost when applied to low density developments such as might be typical of residential developments in Forest Heath. There are obvious advantages to incorporating a distribution network in a new development as opposed retrofitting existing developments and proposals for Sheldrick Way should explore these options with potential links to proposed new residential development to the west.

Other options for generating energy include:

PV cells that are not roof mounted (i.e. walls and ground)

Any development proposal should seek to optimise all of these technologies and this is likely to be necessary if a BREEAM Excellent rating is to be achieved

A report by Ramboll commissioned by FHDC has identified a range of low to zero carbon technologies that are potentially suitable and viable:

- Biomass heating with solar photovoltaic
- Water source heat pump (WSHP) with solar photovoltaic
- Solar thermal
- Ground source heat pump (GSHP) with solar photovoltaic

These opportunities have been identified based on evidence obtained during early phases of the review covering heat mapping and energy master planning for the proposed development. Each of these opportunities has the potential to deliver cost and carbon savings when compared to traditional natural gas fired heating plant options. The viability of these opportunities and savings achievable will be subject to further, more detailed analysis which will be reported in spring 2016.

7.3 WATER

Water consumption is a critical area for a BREEAM assessment and efficiency of use will be required. The combined scale of the hub complex should help minimise the infrastructure costs (eg storage, filtering and pumping) of grey water use technologies which could be installed to meet the joint needs of all occupiers.

7.4 TRANSPORT

A single location providing a wide range of public services should act to reduce trips, both by those using the services and those providing them and this is one of the key strengths of the concept. On the other hand, the site at Sheldrick Way is not well-connected to the existing movement network in Mildenhall so efforts will be required to minimise the various impacts of journeys made. Key design issues in this regard are explored in Section 6.1: Access and Movement and this section looks at sustainability issues only.

7.4.1 Parking

While modes of transport other than private car should be preferentially encouraged the environmental impact of car movements can also be reduced. Cars alone are responsible for approximately 12% of CO² emissions in the EU (European Commission Climate Action 2015) and are recognised in adversely affecting air quality and health. However there are trends in car technology that set to improve this situation, including:

- improvements in electric/hybrid car design (battery life and performance)
- a growing interest in 'sub-compact' or 'city' cars
- autonomous cars
- self-drive car sharing

The hub development should lend encouragement to these trends. It is recommended that 10% of parking spaces, located preferentially, should be for electric vehicles. Consideration should also be given to preferential parking provision for very small vehicles (under 3m in length) and car sharing.

7.4.2 Transport Plan

A transport plan is being provided separately by WSP Group.

7.5 BIODIVERSITY

Development proposals should seek and exploit opportunities to enhance the biodiversity of the site. In particular it is expected that the proposals will:

- retain existing features of value where feasible to do so
- use predominantly native woody and herbaceous species and, where appropriate, those species that provide food (including nectar) and shelter for wildlife
- use Sustainable Urban Drainage features such as swales, rain gardens and/or detention basins to increase the variety of habitats for flora
- provide a wildlife corridor(s) that links to the deciduous woodland occupying the Lark river terrace to the south to the core of the hub (via the school boundary and /or a direct footpath/cycleway) and potentially on to other corridors perhaps linked to the footpath and cycle network
- provide roosting opportunities in or on buildings for bats and birds
- bio-roofs: providing opportunities for wildlife on roofs is not incompatible with exploiting their potential for energy production and can help with sustainable drainage of the site
- set out a scheme of management that promotes and protects the development of wildlife resources, such as the development of wildflower meadows in preference to short mown grass
- make use of the habitats provided as an educational resource for the schools on site and in turn promote environmental awareness

7.6 MATERIALS & WASTE

BREEAM awards credits for minimising embodied energy and waste throughout all phases of the construction and operation of the development.

Innovation

7.7 BREEAM INNOVATION

BREEAM Assessments allow an additional 10% of credits for 'innovation' in order to give recognition to

"sustainability related benefits which are not currently recognised by standard BREEAM assessment issues and criteria."

[BREEAM UK New Construction non-domestic buildings technical manual 2014, p.23]

In itself the concept of the public services hub as proposed would have some innovative features, particularly in the way that it links educational facilities. This also provides a unique opportunity for further innovation, for example by providing a community environmental education facility. Such a facility might explain the full range of technologies employed in the design and construction of the hub. It would be of particular benefit to the schools and their educational programs but it could also engage with the community at large. This would have benefits in terms of promulgating environmental awareness and as such might also draw additional credits under a BREEAM assessment. One model of how this might work exists in the residential quarter known as 'Vauban' in Frieburg, southern Germany. This recently completed residential development, which encompasses two primary







Figs. 7.1-3: BREEAM Innovation

schools, is often cited as an exemplar in terms of environmental impact and the community has provided a small building where green technologies are exhibited and explained.

(5) Summary Evidence on District Heating Networks in the UK (Dept of Energy & Climate Change July 2013)

8 PHASING

8.1 User Requirements

The Business Case explains that there is an order of priority in terms of need for new accommodation by the hub partners / user groups.

(i) First Order - Leisure Centre:

This element has the highest order of priority as delays in delivery are likely to result in significant expenditure that could otherwise be invested in the hub site.

"Both the Dome and the swimming pool are reaching the end of their lifespan and will require a large investment to keep operational, in particular the swimming pool would need to be the first part of any phased build" (Business Case)

(ii) Second Order - Secondary School; Offices:

Although not in good condition the need to relocate these facilities is slightly less pressing than for the Dome and swimming pool. The phasing of the school replacement will also ultimately be determined by the ability to attract EFA funding. Once the existing sites are released they become available for redevelopment. It seems likely that phased release of these sites would help maximise returns.

(iii) Third Order - Primary School:

The need for a primary school arises from the likely level of growth of the population of Mildenhall planned for the period 2015-2030. It is anticipated that the school would need to be completed mid-way through this growth period.

Re-fitting / refurbishment of the 6th Form College is likely to be limited in extent and could progress as and when required regardless of the phasing of other elements of the scheme and therefore can be considered separately.

8.2 Site Organisation

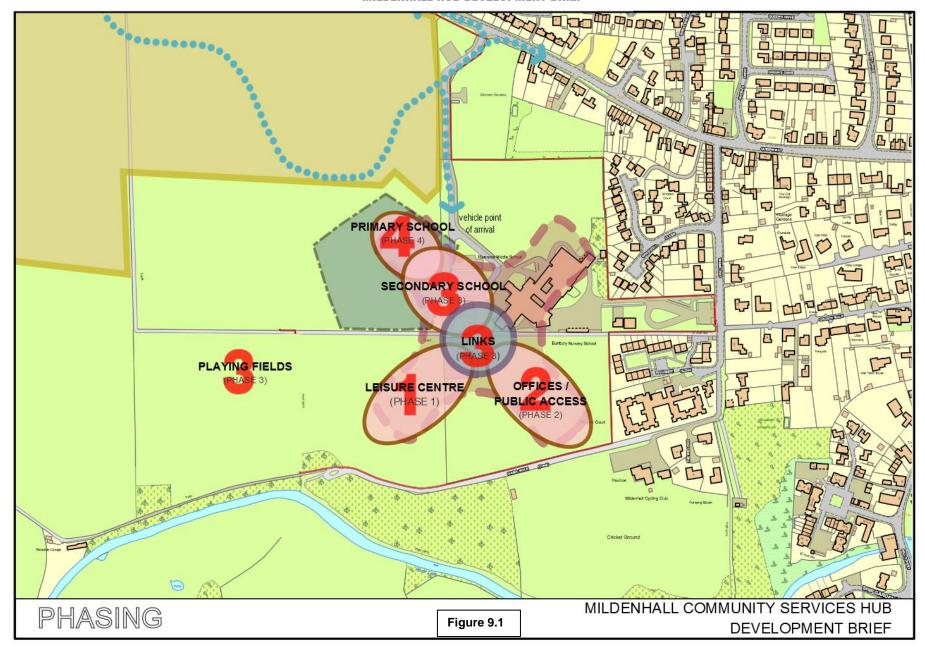
The most logical way to build-out a site is to start at the most distant part from the construction access point and work back towards that point. This ensures that deliveries, construction traffic and activity crossing occupied parts of the site is minimised. It helps to reduce costs and inconvenience. The point of access would be from the north and, most likely, from Sheldrick Way as a new road serving the urban extension would not be available initially. Thus, in terms of site organisation, the first order (Leisure Centre) should be placed at the southern end of the site. This fits with the most logical layout of key elements in the longer term (see Fig. 6.1). The 6th Form College is being retained whilst the schools should be placed closest to the residential areas served and, ideally, on a bus route with a separate entrance distinct from the main hub access.

The swimming pool and leisure uses could occupy either the south-west or south-east arms of the hub complex. The south-east arm might offer the better relationship in terms of walking /cycling to the town centre however most users are still likely to arrive by car. The south-west arm may offer the most flexibility in terms of accommodating the external artificial pitch in proximity to the building and ease of access from the schools and is considered the most optimal location overall. However this would pose some operational difficulties during the construction phase. With the leisure centre in use, and being accessed from the car park and/or town centre footpath, construction traffic accessing the south-east arm would have to cross the flow of pedestrian traffic. If the far south-west corner of the site is to be used for complementary housing (see fig. 6.4) consideration will also need to be given to the architectural relationship between the hub and the houses.

8.3 Architecture

Phasing will also be affected by the architectural solutions to the users brief for shared facilities. If different user groups are in distinct buildings that are physically separate it becomes much easier to phase delivery. Where uses are shared in a single building such phasing may not be feasible, in either financial or operational terms. Buildings that are linked present a combination of these issues

and much will depend on the architecture. Figure 9.1 indicates how delivery of distinct buildings might be organised.



9 STATUS OF BRIEF

9.1 Committee Report Draft

A First Draft of the Development Brief for Sheldrick Way Public Services Hub has been published for public consultation and engagement purposes. This Draft incorporates responses to comments received and is intended for presentation to Committee with a recommendation for adoption as Informal Planning Guidance.

Once adopted as Informal Planning Guidance the details and guidance within the document would be taken as material considerations when the Council comes to determine any planning application submitted for a public services hub at Sheldrick Way.

APPENDIX 1 ECOLOGY SURVEY 2015

Site name M/19 Land West of Mildenhall, South of West Row Road

FHDC Ref: M/19

Site status: No wildlife designation

 Grid ref:
 TL 70090 74950

 Area:
 82.1 hectares

Date: 21 July & 11 August 2015

Recorder: A Walmsley

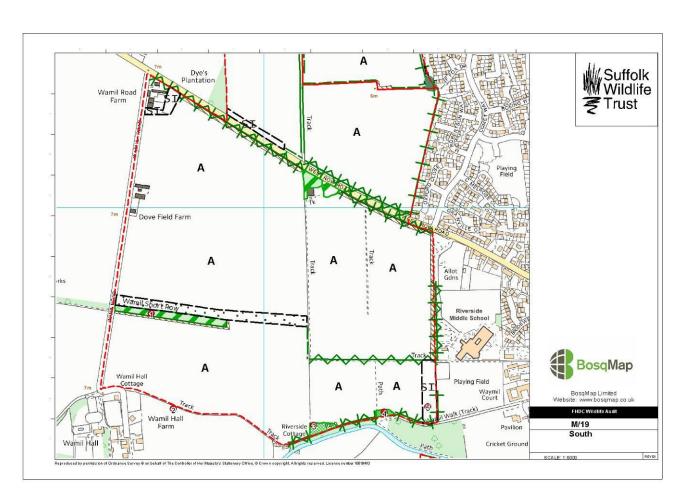
Weather conditions: Day 1: Sunny, windy, 22°C

Day 2: Sun and cloud, light breeze, 16°C

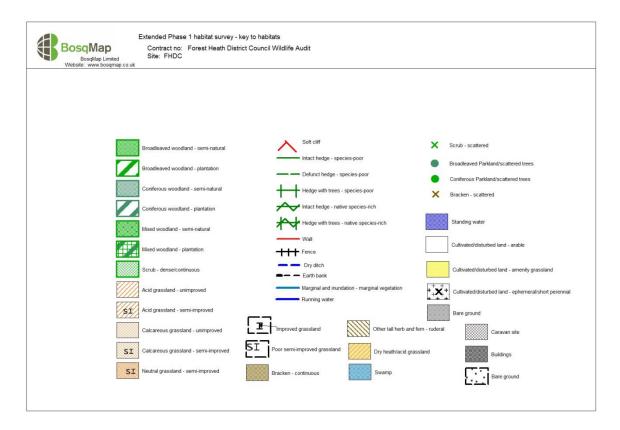
Ranking: 4

Biodiversity value: Medium

Map:



South section



Photos:



Narrow field margins alongside barley crop on north side of the site



A dense belt of native scrub and trees adjacent to the west boundary in the south provides refuge and valuable nesting and roosting habitat (Target Note 1)



Many internal hedges have been removed in the south part of the site leaving large swathes of uninterrupted arable land



A pit adjacent to the south boundary and close to the river corridor is heavily overgrown with scrub and trees (Target Note 3)



Small broadleaved woodland blocks adjacent to the main road

The south boundary has a partial hedge along the eastern side and a narrow, species-poor verge or bank, seen above, on the west side (Target Note 2)

Habitat type(s):

Arable field margins, hedgerows, woodland

Subsidiary habitats:

Scrub, bare ground, deadwood

Site description:

The site is located at the western edge of Mildenhall, south of Mildenhall Airfield, and straddles the West Row Road. It consists almost entirely of large arable fields under a variety of crops, including beet, barley and potatoes. On the south side the fields are extremely large with internal hedge boundaries now largely removed. With one or two exceptions the remaining hedges are around the site edges or bordering access tracks, these are often tall and dense. Field margins are generally narrow and dominated by a range of ruderal species, but three plants listed on the Suffolk Rare Plant Register, dense-flowered fumitory, fine-leaved fumitory and prickly poppy, have previously been recorded along the south boundary of site.

There are one or two small pockets of woodland and scrub habitat, mainly at the site edges: on the south side, along the south boundary, are two overgrown pits (Target Notes 3 and 4); a broad shelter belt of scrubby woodland in the south-west (Target Note 1); and two fragments of recently planted screening woodland along the north boundary. On the north side is a short belt of dense scrubby habitat where hedges bordering an access track have grown across and blocked it (Target Note 6).

The site contains small fragments of grassland: in the south-east corner this is a narrow strip of poor semi-improved permanent grass (Target Note 5); while a few small paddocks on the east side of Wamil Hall Farm support semi-improved grassland.

There are two farms with outbuildings on the western edge of the south parcel and a large new grain-store on the north boundary, concealed behind new woodland plantations.

Protected species seen or known:

_

Protected species potential:

Bats

Priority habitats present:

Arable field margins, hedgerow

Priority species seen or known:

White letter hairstreak butterfly (previously recorded in south of site)

Priority species potential:

Small heath (recorded from the same 10km square), turtle dove, barn owl, tree sparrow, swift, skylark, linnet (recorded from the same 10km square), hedgehog, brown hare, common toad

Connectivity:

The site lies partly adjacent, on its south side, to the River Lark, a valuable wildlife corridor through the south side of Mildenhall. The river connects to other high quality habitats on the outskirts of the town such as the Cut-off Channel to the east. To the west, south and south-west is an extensive network of arable fields which are largely uninterrupted by roads.

Structural diversity

Structural variation within the site is provided by hedges and screens of trees; rough grassland which has taken the place of hedgerow boundaries; ruderal field margins; and bare soil around crops. There are small pockets of high quality scrub and woodland habitat which are structurally very diverse and species-rich, but these tend to be isolated and at/near the site boundaries. There is some deadwood within the site, mainly as aerial dead timber on trees; and various structures including barns, outbuildings and sheds.

Flora:

Three plants listed on the Suffolk Rare Plant Register, including the nationally scarce dense-flowered fumitory, and prickly poppy and fine-leaved fumitory, both classified as 'vulnerable', have all previously been recorded along the south margin of the site. Fumitory was frequent in this area, but it is a complex group to identify to species, and a more detailed botanical survey would be needed to establish presence/absence of the two species listed above. In general throughout the site the arable margins are narrow, dominated in the north by ruderal broadleaved species such as black horehound, common mugwort, common and dwarf mallow, bugloss, poppy, nettle, yarrow and both white and bladder campion. Species such as fat hen, mugwort, dwarf mallow and dwarf nettle are frequent in the bare soil at crop edges. Greater knapweed, field scabious, lady's bedstraw and great mullein also grow along one bank in a hedgerow gap. In the south parcel, field margins are infrequent on the west side, and on the east are grass-dominated.

On the south side, hedgerows are relatively few, confined to the north and east boundaries, with partial hedges along the south. With one or two exceptions on the east side, most internal hedges have been removed. The most significant internal hedge is a relatively recent planting in the south east, running east-west. It is 3-4 metres wide and species rich, with field maple, hawthorn, spindle, dogwood and hazel. Elsewhere there are the remains of a hawthorn and blackthorn hedge alongside an internal track. Along the south side the boundary is gappy with much deadwood and frequent trees, the main components being sycamore, elm, elder, hawthorn, blackthorn and mature ivy.

On the north and south sides of the main road which bisects the site the hedges are tall and unmanaged with frequent trees and occasional gaps. They are composed of hawthorn, locally abundant wild privet, occasional elder, blackthorn, bramble, with ivy and white bryony; hedge trees are mainly of sycamore, some of which are pollards.

There are some valuable scrub habitats on site. In the south parcel, along the south boundary, are two overgrown pits (Target Notes 3 and 4); a broad shelter belt of scrubby woodland in the

south-west (Target Note 1); and two fragments of recently-planted woodland along the north boundary. The smaller of the pits is deep and heavily overgrown, providing exceptional scrub, deadwood and bare chalk habitat close to the river corridor (Target Note 3). Species here include hawthorn, spindle, blackthorn, elder and ivy with ruderal growth below. Collapsed trees provide valuable deadwood habitat. The second pit is much larger, more open and poorly-vegetated, below a canopy of tall sycamore. In the south-west is a 12 metre-wide shelter belt of elm, sycamore, wild privet, blackthorn, field maple, hawthorn, ash, beech and elder over a ground flora that contains wood false-brome, cuckoo-pint, wood avens, cow parsley and coarser vegetation as well as regenerating saplings of the canopy species. This area contains abundant deadwood, both standing and fallen; and has an excellent varied structure, providing a range of habitats. Finally, along the north boundary of the south parcel are two small areas of woodland, planted as screening around a grain store. The canopy species are silver birch, cherry, horse chestnut, beech and sycamore with an understorey of hawthorn and regenerating canopy species. The ground flora is ruderal, often of nettle.

There are small fragments of grassland in the site. At the south-east corner is a narrow strip of poor semi-improved permanent grass (Target Note 5), which has a high density but limited range of herbs, including common cat's-ear, dandelion, red, white and zigzag clover, ribwort plantain and the grasses cock's-foot, rye and false-oat grass. At the north-west corner, behind outbuildings at Wamil Hall Farm, are small enclosed paddocks which contain clovers, smooth-hawk's-beard, creeping cinquefoil, dove's-foot crane's-bill, goat's-beard, bird's-foot trefoil and yarrow. The verge along Wamil Road contains a similar array of species in places with the occasional addition of species such as greater knapweed, toadflax, lucerne, mallow and bladder campion. The western stretch of the south boundary verge is narrow and largely dominated by low-growing and taller ruderal species, with occasional acid grassland indicators such as wild mignonette and fumitory.

Avifauna:

Nesting opportunities are abundant in the hedges and shelter belts in both parts of the site, and these areas also provide ample foraging opportunities with many fruit-bearing species. The grassy banks may provide hunting corridors for insectivorous species and potentially raptors: both swift and barn owl have been recorded nearby. A wide range of species has been recorded to the north of the site, including yellowhammer, song thrush, linnet, bullfinch, reed bunting, skylark, turtle dove, lapwing and tree pipit, and some of these may periodically use the site for feeding or nesting. During the surveys, species recorded included sparrowhawk, buzzard, pigeon and rook. Swallows were also recorded in abundance hunting over the fields in the north of the site.

Invertebrates:

The site offers a range of habitats for this group including bare basking areas, areas of short and longer grass, and scrub and shelter belts creating warm and still microclimates. The tall grass banks particularly in the north of the site and patches of permanent, herb rich grass in the south provide valuable habitat, with nectar and pollen-bearing plants, and grass tussocks providing refuge and nesting areas. Hedge species also provide forage in the form of nectar and pollen, and fruits in autumn/winter. Invertebrate species recorded during the survey included

grasshopper, ladybird and the butterflies ringlet, skipper, meadow brown, red admiral and cabbage white. The Priority butterfly species white letter hairstreak and grayling have previously been recorded from the 10km square to the north of the site.

Herpetofauna:

The intensively used nature of the site suggests it is likely to have low potential for this group, although the sheltered areas of bare ground, banks of longer vegetation at the bases of hedgerows and connectivity to undisturbed habitat corridors may make parts of it suitable for species such as common toad.

Mammals:

A range of small mammals may use the boundary banks and hedges for feeding, nesting and to move around the area. There is high potential for bats to hunt over the site, particularly at the edges of dense scrubby areas and alongside hedgerows, and there may be some roost potential in hedgerow trees and areas of scrub, although the farm buildings in general appear to offer low roosting potential. Hedgehog has been recorded in several locations close to the site and may use of hedgerow bottoms and rough grassland along the field margins. Field signs of both fox and rabbit were noted during the survey and other very mobile species, including deer, are highly likely to pass through the site.

Comments and recommendations:

In general terms, the site is of relatively low ecological value, but there are records of three plants listed on the Suffolk Rare Plant Register, one of which is Nationally Scarce and the others 'Vulnerable'. None of these species was seen during the survey, but a more detailed botanical assessment of the site, particularly along the south boundary, should be as part of any development proposals. Surveys for bats and birds should also be undertaken.

The scrub and woodland habitats which occur mainly along the boundaries have a relatively high ecological value in their own right, and are of especial importance in an intensive arable context. If the site is considered for development, it is strongly recommended that these areas of habitat be protected from development; and their wildlife value enhanced by improving their ecological connectivity to areas of adjacent habitat. The amount of habitat across the site could also be increased by further planting of species rich native hedging to improve linear connectivity through the site.

Japanese rose (*Rosa rugosa*) is present within the eastern hedgerow. This species is commonly grown in gardens, but it is listed on Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) as a species which should be prevented from spreading in the wild. If development proceeds at this site, measures should be put in place to ensure that construction activities do not result in the further spread of Japanese rose at this location.

For sites within 7.5km of the Breckland SPA

A study undertaken by Footprint Ecology on behalf of Forest Heath DC and St Edmundsbury BC identified that over half of visitors to Breckland SPA locations within the districts lived within 7.5km of the SPA. It is therefore considered that new residential development within 7.5km of the SPA will result in increased numbers of visitors accessing the SPA; this could in turn result in significant impacts on the features for which the SPA is designated. Prior to granting planning consent for residential development at this site the proposed development should be assessed under the requirements of the Conservation of Habitats and Species Regulations (2010) (as amended) to determine whether it is likely to result in a likely significant effect on the SPA, either alone or in-combination with other plans or projects

References

- 1. Parish Profile. s.l.: Forest Heath District Council, 2011.
- 2. Joint Development Management Policies. s.l.: West Suffolk Local Plan, February 2015.
- 3. **Dept of Energy & Climate Change.** *Summary Evidence on District Heating Networks.* July 2013.
- 4. European Commission. Climate Action . 2015.
- 5. **Building Research Establishment.** *BREEAM Technical Manual New Construction Non-Domestic Buildings.*
- 6. Forest Heath District Counci. Adopted May 2010. s.l.: lCore Strategy.
- 7. Concertus Design & Property Consultants. Mildenhall Hub Business Case. 2014.
- 8. **Suffolk County Council.** *Suffolk Landscape Character.*
- 9. Suffolk County Council Archaeological Service. Brief for Fieldwalking Survey. 4 July 2012.
- 10. **Buildings Research Establishment.** *Common Carbon Metric for Measuring Energy Use non-domestic Buildings 2020 and Beyond.* 2009.

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Document:	Mildenhall Hub Development Brief	Total Representations:	APPENDIX B 37
Current Stage:	Evidence gathering	Filter Count:	0
ID	Stakeholder Group	Representation	How it was addressed
1	Resident?	Absolute madness there is no need for a Hub and the choice of location by a school with the obvious issues shows a complete lack of intelligence. I have no intention of listing the flaws in this location choice as a 5 year old child would see them. This scheme is of no benefit to the Town at all.	It is a shame that the opportunity to explain the criticism of the proposal has not been taken. However, the benefits of the hub are clearly set out in the 2014 Business Case (as updated in 2016).
2	Stakeholder	Great.	Thank you for your positive comment.

Stakeholder

This allocation lies in an area of very high archaeological potential, recorded in the County Historic Environment Record. Field walking and metal detecting within and surrounding the proposed development area has detected substantial multi-period finds scatters, indicative of activity from the prehistoric to the medieval periods (MNL 141, 167, 220, 310, 421, 428). The development site is also located in an area which is topographically favourable for early occupation, overlooking the River Lark and on a south facing slope. On the opposite side of the river and in a similar landscape location, a significant Iron Age settlement site was revealed during archaeological investigations (BTM 040), along with associated Neolithic and Bronze Age settlement activity (MNL 710). A series of human burials were also uncovered during the excavations. As a result, this location has high potential for the discovery of important hitherto unknown archaeological sites and features from all periods in view of its proximity to known remains. The proposed works would cause significant ground disturbance that has potential to damage any archaeological deposits and below ground heritage assets that exist.

Given the high potential, lack of previous investigation and large size of the proposed development area, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site before a Development Brief is finalised, to allow for preservation in situ of any sites of national importance that might be defined (and which are still currently unknown). This large area cannot be assessed or approved in our view until a full archaeological evaluation has been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 128 and 129 of the National Planning Policy Framework.

Decisions on the suitability of the site, and also the need for, and scope of, any further work should there be any below-ground archaeological finds of significance, will be based upon the results of the evaluation.

Thank you for this advice. A full archaeological evaluation will be carried

- 1. It would be helpful for at least two display boards be made available at future events. It was very, very difficult for everyone to get close enough to study the information without being in the way of others, and everyone felt the need to "move on" before ready.
- 2. It is apparent that the existing Allotment site remains undisturbed.

However, the entrance gates open outwards - effectively restricting the road width At present, this is not too much of a problem as the traffic is minimal into the school area, particularly evenings and weekends

Once The Hub is built - this road will become the main thoroughfare, effectively a single-track road

- 3. When Sheldrick Way Allotments were set out, plans were made available for an additional 15 Allotment plots on the opposite side of the road which is currently farmland Mildenhall Parish Council has a waiting list of 40 applicants (which will increase with additional builds) and there is an immediate need for, not only the release of this additional land but a commitment from SCC for further space allocated to Allotments. Provision of sufficient Allotments is a legal requirement (please advise how this can be achieved)
- 4. The Hub will be the focus for Local Government, Health and Education The proposal is for it to be sited on Suffolk County Council land and would appear to all intents and purposes to be ideal

However, Mildenhall currently suffers from a very dangerous traffic situation - namely around the War Memorial and the Old Police Station Square.

- a. At Police Station Square there is a boxed (Give Way) to allow access/egress for vehicles onto/off Kingsway. It is sometimes acknowledged, although not always
- b. Once in Kingsway vehicles are faced with parked cars on both sides and since the new housing development made no provision for the standard 2-car family additional cars are now found parked on the main Kingsway road.
- 5. The Hub will lie directly opposite the housing site referred to as Comet Way which has become a "rat run" for vehicles trying to avoid the town center. The Hub will ensure an unacceptable amount of traffic into and out of Sheldrick Way which is already a very, very busy junction.
- 6, Vehicles travelling from West Row do not always slow down at the 30mph sign. But effectively are travelling well into Kingsway (past Sheldrick Way) before they reach the legal speed. :-
- a. There was no evidence that a roundabout would be installed at the proposed siting of Sheldrick Way, Kingsway/West Row Road, Boeing Way, despite being advised by the

Thank you for the comments relating to the display boards. We will take this on board for future events. The Hub project does not make provision for additional allotments, but any further housing growth arising from the Local Plan process will need to make provision for additional allotments. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. The suggested road priority changes shown at Figure 6.1 should help address the current issue relating to traffic speed. This will also be subject to consideration as part of the traffic assessment.

Highways Department that a roundabout would be included.

7. Given the potential for an increased and hugely unacceptable traffic congestion at what is already a dangerous site (namely Old Police Station Square) -- I raise my strongest objections to the siting of The Hub.

Anyone wishing to avail themselves of the amenities The Hub seeks to offer - will be travelling across town

Emergency Services, Educationalist, Health professionals and users plus staff will all be travelling across town to reach the arterial routes

The opportunity to improve Mildenhall Town will be lost before the first spade has been dug.

This design will directly cause increased traffic flow, the unnecessarily criss-crossing of vehicles which will have one inevitable conclusion - several minor accidents, a few major accidents and (sadly) fatalities

The one consolation --- emergency services will be on hand to ferry the injured to hospital - provided they can get across Five Ways roundabout!

6 Resident

As Mildenhall Parish Council currently have 40 residents on the Allotment waiting list. What provision will be made at the new development to incorporate this legal requirement.?

The government and SCC are fully supportive of Well Being Initiatives.

A group is interested in starting The Shed project, which, along with additional Allotments --- would be a venue for people with various issues, to come out and do some gardening, or socialise, or simply be at peace, working with nature. The Shed will utilise one or two standard plots and in close liaison with other charitable and national health agencies, will provide a much needed facility.

It was my understanding that additional Allotments were being provided alongside the existing Sheldrick's Way site.

Also - it was my understanding that The Hub layout plan would incorporate amenity space to embrace Allotments.

Please confirm these two requirements are incorporated in future plans

The Hub project does not make provision for additional allotments, but any further housing growth arising from the Local Plan process will need to make provision for additional allotments.

7 Resident 8 Resident 9 Resident

Centralising everything has notorious record for not working, the congestion to all getting to the Hub will add to the already horrendous congestion, lorries delivering, people, children mingling around and all trying to reach the one place, the infrastructure work support this kind of central point. Mildenhall will die in other places because people will spend there time there sorting things out, building up tensions. The dream to centralise it seems good but well plotted out services around Mildenhall will elevate a lot of congestion, putting like minded services together is better.

The benefits of the hub are clearly set out in the 2014 Business Case (as updated in 2016). However, the concerns about congestion will be addressed through a detailed traffic assessment.

Thank you for informing me of the plans for the new Hub.

I live on Queensway, so this will have some impact.

I see from the business plan that obviously road access will be and has been investigated. Improvements to the junction where Queensway meets Kingsway is obvious, and I would suggest we would need an additional road to access this end of town, which would not only benefit the hub, but also future housing development.

I suggest a road access from Sheldrick way, or the West Row road across to the Worlington road. This would enable access to the site other than through the town centre and also access out towards the A11.

Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. The Hub project would not warrant the suggested highway works to connect Sheldrick way with the Worlington Road.

I have not seen any marketing with regards this proposal which is probably one of the biggest in many years for the town.

There will be many people who are unaware.

Appears to be advancing without very little public consultation.

Not easy to find on the web site.

Have concerns about road infrastructures that struggle currently so goodness knows what they will be like if this goes ahead.

Considering all major routes are in opposite direction to location would it not have made more sense to relocate Emg services as close to major routes.

Proposed 1000 dwellings!!! Where are those people expected to work? Employment in this area is not booming.

Loss of natural habitat for wildlife.

Can you advise where next public meeting is going to be held and where it will be advertised.

These comments appear to relate to the local plan sites allocation consultation, as well as the Mildenhall Hub. The observations relating to the siting of emergency services are addressed elsewhere. An invitation to attend one of the Local Plan consultations has been sent to

this correspondent.

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10 Stakeholder Group

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for your response.

Natural England does not consider that this Draft development brief for the proposed Public Service Hub in Mildenhall poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

11 Resident

Visited Mildenhall Parish Council offices. Viewed the plans on display. No mention was made about parking on the Sheldrick Way site. Also, more importantly road access will be inadequate unless there is relief for the current Queensway and West Row roads. Go back to the 70's, when it was suggested a road should be built from the A11 across the Worlington road leading to the industrial estate. Nothing ever happened! Just my comments. Thanking you.

Parking will be required in accordance with adopted parking standards. This level of detail will be required at with any subsequent planning application and will be related to the development proposed at the time.

Having attended the informal drop in on 6/4/16, I have the following comments.

The junction at police station square should be restructured before any work has commenced at the hub site.

Also the road from police station square to the site needs some thought on road width and on street parking.

Signage to the site should direct construction traffic and after completion people using the hub from all directions to go via Queensway so as not to encourage traffic to use other routes as a rat run.

Although I understand the idea about car sharing cycling etc, traveling past any council offices, schools, sports facilities, the number of cars in the staff car parks would indicate that the idea is good but in practice it does not work. So the amount of parking already planned needs to be increased. At least by half as much again.

And while construction is taking place sufficient parking on site for construction workers needs to be provided, to avoid local roads becoming car parks.

As the government has announced that education is to be taken from local authority control. I am not sure how this will affect the financing of the project.

Also with an announcement about the fate of RAF Mildenhall to be made soon. I think that the location and size of the Hub may need a complete rethink if housing development is the suggested option for the base. As some facilities on the base may be able to be incorporated into the local plan.

Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. Mildenhall Academy is not a local authority school and as such, receives funding from central government. The future of RAF Mildenhall will not determined for a number of years yet, but the new facilities are required now. However, they may have a role to play in the future.

I attended the session in the Fenland Room. My conclusions are:

- 1. There would definitely need to be a bypass ab initio. This would be at least 4 km long, crossing three roads, cutting through a housing estate, and passing through prohibited forestry to reach the A1065, or bridge the Lark and pass over a flood plain to a new junction on the A11, both extortionately expensive. This would be necessary both from the point of view of over-loading of the junction at Police Station Square and the necessity for services to reach the A11 promptly.
- 2. I can see no vital purpose in hubbing. A hub in this location would be further for most children to go to school than to their present location on the Bury Road, or to go to the swimming pool. If there is a need for a new pool, why not locate it, either in its present location, or at the school. Why move the Police,fire, health advice, job Centre, etc.- they would be further from homes on average, and from the A11, in the case of police and fire service.
- 3. The argument for a library is also weak, as most children will read books on the internet, certainly by the time it is built. The same would apply to meetings, which I said could take place by video-links with split screens etc. i.e. by the time it would be built a hub would be outdated and less convenient than are the dispersed units.
- 4. It would occupy good agricultural land. With the rise in the UK population and rapid rise in world population with climate change, the UK may be required to produce most of its food later this century at present it produces less than half!
- 5. The cost of this project would not be justified.
- 6. if the US leaves the current Mildenhall air base there would be housing to spare over the next few years; but I am unclear on what is likely to happen- certainly Europe will be required to defend itself to a greater extent in the near future than it does at present. This could change the local scene in several ways!

The Hub project will largely redistribute existing traffic within the town, rather than introduce new traffic. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. The Hub project is unlikely to require the suggested bypass. The benefits of the hub are clearly set out in the 2014 Business Case (as updated in 2016). redevelopment of the existing sites was considered. As has been identified, the future of RAF Mildenhall will not determined for a number of years yet, but the new facilities are required now. However, they may have a role to play in the future.

We are very much in need of a new swimming pool etc and as a family would greatly welcome this, we also understand about cost saving etc, but as a resident on the Comet Way junction with Oxford Close we are greatly concerned about the increase in traffic and what provision is in place to manage this.

With so many amenities all in one place and further plans for housing, the traffic concentration will be huge, there may be plans for access roads but the Comet Way estate will need to be protected from the cut through / rat run opportunity that many drivers will take to access the hub.

Also I know the police and fire service have signed up to the idea but the placing of these in our opinion is the wrong side of town, as you will be aware there is massive pressure on these services to meet response times, being this side of town means emergency vehicles will be responding to immediate grades right through town, and dispatching from a location where there will be a high concentration of children, the elderly and generally high pedestrian traffic – not the most sensible idea?

A one site option might be the best financially but the impact of traffic and high level of professional and service users may be too great for one site, I don't feel there has been much public consultation at all on this idea.

I know we are not aware of many of the considerations that the council are dealing with, but we are not convinced this is the best plan.

Thank you for reading and I would appreciate any comments you have,

Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. The suggested road priority changes shown at Figure 6.1 should help address the current issue relating to traffic speed and may address the Comet Way junction. This will also be subject to consideration as part of the traffic assessment. Whether the police and fire service sign up to the proposal is entirely their own decision, based on their operational requirements.

After seeing the plans for the Mildenhall Hub and discussing my concerns with you yesterday, I would like to put the following points forward for consideration:

- 1. Access: Queensway is accessed from the town centre either by New Street or the junction by the mini-roundabout in Police Station Square. This junction has a confusing layout as it is not really clear as who has the priority in the "Keep Clear" area. This needs attention as the roundabout is well-used and as the only route from High Street and North Terrace to the shopping area will the additional traffic to and from Queensway create delays and congestion? The Courthouse Veterinary Clinic has the exit from its car park on to Queensway. I am concerned that clients will find it difficult to emerge on to the road if there is increased traffic along Queensway.
- 2. Pedestrian crossings: It is quite difficult to cross Queensway as there are no pedestrian crossings from High Street and there is not a long view of approaching traffic. Residents from the Comet Way and Churchill Drive estates need safe crossing places to access the town centre, as do pupils attending the school in Sheldrick Way.
- 3. Parking: You mentioned that there would be about 400 parking spaces in the proposed site. Has the Council surveyed the number of parking spaces already used by Council staff, staff at the Upper School, staff at the Library, Health Clinic and Swimming Pool, and how the current car parks in these sites are occupied, especially in peak times? Residents who have appointments at the Health Clinic need to know that they will be able to find a parking space, particularly if they have health or mobility problems. This also applies to residents from communities surrounding Mildenhall who need to use services that are not available in their area. There certainly needs to be adequate parking to meet demand on weekdays. There is a case for the Health Clinic and Library to remain in their current location and have some of the car parking area from the Council Office site to meet the demand for parking at busy times.
- 4. Public Transport: There is very limited public transport to Queensway. If this development is to be accessible to those without cars, frequent bus services from all parts of Mildenhall to the new hub need to be provided.

Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety, including crossing points. Sections 6.1.1 and 6.1.2 will be amended to reflect this. The suggested road priority changes shown at Figure 6.1 should help address the current issue relating to traffic speed and may address the Comet Way junction. This will also be subject to consideration as part of the traffic assessment. Parking will be required in accordance with adopted parking standards. This level of detail will be required at with any subsequent planning application and will be related to the development proposed at the time. Public transport provision is an important consideration.

Whilst it is easy to agree the case for one area that incorporates many of the services that are available to Mildenhall residents, the proposed site, in our view, is not suitable for such an undertaking.

Firstly a project of such a size will create an enormous amount of traffic just from the people who will be employed to operate the facilities. (In the existing car park for the college I counted in the region of 40 cars) With the site set to accommodate Police, Fire, Ambulance, council offices, health facilities, pre-school, library, swimming pool and sports centre, Citizens advice centre and job centre the amount of staff parking could rise to as many as 200 hundred vehicles or more. Further to these numbers will be the numerous visitors to the site who will be a mixture of cyclists pedestrians motor cars delivery vehicles coaches and buses bringing people to and from the facilities. Sheldrick Way is a narrow road that feeds on to what can only be described as a narrow and restricted through road. Having a facility of such diverse nature and only having one way in and one way out seems to be ill considered. Some of the concerns that we have are to do with the people coming and going from the facilities in the proposed hub having to share road space in an area that may be being used by emergency vehicles on call. Some of the people using these facilities will be vulnerable IE young children and perhaps the elderly. I feel that this represents potential hazards that are unacceptable. Furthermore all emergency vehicles on call would have to go through Mildenhall town to reach almost anywhere. This would involve going via Police station Square which is a choke point at the best of times. In the event of a major incident on the A11 the possible hold ups for emergency vehicles not able to get through the town could very easily result in the loss of life. There is also a possibility that traffic leaving Sheldrick Way may be tempted to use the Comet way Estate as a rat run which would be very detrimental to the quality of life of the families that reside there.

Parking will be required in accordance with adopted parking standards. This level of detail will be required at with any subsequent planning application and will be related to the development proposed at the time. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety, including crossing points. Sections 6.1.1 and 6.1.2 will be amended to reflect this. Sheldrick Way is not particularly narrow, being 6m wide, which is wider than parts of the A1101 in Mildenhall. However, its suitablity for additional traffic will need to be fully assessed.

We live at Oxford Close, which sides on to the West Row Rd., near the access to Comet Way & The Riverside school, so we are particularly interested to understand the finer details of the proposed Public Service Hub;

Our initial thoughts therefore are:-

- 1. it seems the current road access to The Riverside school is very narrow & will need to be widened to accommodate more regular traffic flow
- 2. this is a good opportunity to create a roundabout at the junction with Comet Way, feeding to a larger access to The Hub development. This will not only facilitate traffic flow from all sides but also help contain vehicle speed in & out of Mildenhall; despite recent attempts to restrict vehicle speed in this area, traffic is still travelling too fast entering & leaving Mildenhall along the West Row road.
- as part of the changes above, the existing pedestrian crossing should probably then also be relocated further up the Mildenhall side of the current access to The Riverside school.
- 4. the Hub scheme should prioritise seeding junior & senior football pitches for Mildenhall Teams, with good parking & pavilion facilities e.g. Red Lodge & Isleham we currently have very few such pitches/facilities in Mildenhall, forcing Teams to use facilities in neighbouring villages. We should use this scheme to promote sport & healthy living to all parts of the community going fwd.
- 5. the new swimming pool should include other extended leisure facilities e.g. flume, wave pool aswell as a main pool for competitive galas this will serve not only Mildenhall people well but also help attract others in from outside the Town
- 6. I understand Sainsburys are keen to buy the land where the existing swimming pool stands we should secure maximum value for this site but at the same time revisit traffic flow to/from Sainsburys maybe a new 1 traffic system through the town (passing Bussens & Parkins) & in to Sainsburys, exiting via the Jubilee Fields parking area & down St Andrews St

7.another 'wish list item', funds providing should be lighting for the new West Row cycle path - e.g. like the equivalent at Morton Hall BSE to encourage safe usage to/from the Hub & Mildenhall Town, all year round

With all the other changes facing Mildenhall over the coming years, the Hub scheme is a great opportunity to raise the town's profile as an attractive place to live/work in the future. I look forward to hearing more about the positive developments on this front over the coming months.

Sheldrick Way is not particularly narrow, being 6m wide, which is wider than parts of the A1101 in Mildenhall. However, its suitablity for additional traffic will need to be fully assessed. Despite the signage, traffic speeds have been observed to be higher than the limit and junction amendments which address this would be beneficial, together with safe pedestrian crossing points. The suggested road priority changes shown at Figure 6.1 should help address the current issue relating to traffic speed and may address the Comet Way junction. This will also be subject to consideration as part of the traffic assessment. The design and specification for the leisure facility and playing pitches will be addressed once the general principles of the hub have been established.

further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety, including crossing points. Whether the police and fire service sign up to the proposal is entirely their own decision, based on their operational requirements. The College Heath Road site is not large enough to accommodate the Hub. This is fully considered in the 2014 Business case (updated in 2016).

Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. The proposed housing option has been amended to remove Option 3. The future use of any resundant sites is being considered through the Local Plan process (currently at Preferred Options

As you may be aware this site is rented to full capacity and at this current time there is a waiting list for an allotment in Mildenhall of 30 persons.

The Hub Development Brief retains the existing allotments. The Hub project does not make provision for additional allotments, but any further housing growth arising from the Local Plan process will need to make provision for additional allotments.

- 1. Would it not be cheaper to repair existing public buildings than build a hub?
- 2. The present Medical Centre, Council Offices, Library and Police Station are convenient for a large proportion of Mildenhall citizens, many of whom are not car owners.
- 3. A hub in theory is an excellent idea but having so many amenities in one place makes a hub very vulnerable to aircraft crashes, terror attacks, fire and floods.
- 4. The present road system is unsuitable and Queensway is far too narrow for more traffic. First plan and build suitable roads.
- 5. Regarding car parks, many of our Suffolk car parking spaces are too narrow and there are not enough of them. Think how many cars are likely to use the Hub car park at peak times and double the number. Will Hub car parking be free?
- 6. How will mothers with push chairs and small children reach the Hub medical centre from, say, College Heath Road? They could use public transport and pay which would be inconvenient.
- 7. How will mothers and toddlers attend the library craft activities on a Sunday morning with o bus service?
- 8. Necessary maintenance and repairs to any part of the Hub can inconvenience the whole complex i.e. parking lorries and machinery, work in progress, road repairs and blocked alley ways for pedestrians.
- 9. A new swimming pool and a school are acceptable.
- 10. At present we all benefit from the position of some amenities. A hub would be handy for only about half the population.
- 11. Any development of West Mildenhall will spoil the historic ambience of the neighbourhood which is not often found in modern towns and should be treasured.
- 12. I am against the Hub as spending so much public money cannot be justified during these hard financial times.

The benefits of the hub are clearly set out in the 2014 Business Case (as updated in 2016). However, the concerns about congestion will be addressed through a detailed traffic assessment. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety, including crossing points. Sections 6.1.1 and 6.1.2 will be amended to reflect this. The suggested road priority changes shown at Figure 6.1 should help address the current issue relating to traffic speed and may address the Comet Way junction. This will also be subject to consideration as part of the traffic assessment. Parking will be required in accordance with adopted parking standards, which include wider spaces. This level of detail will be required at with any subsequent planning application and will be related to the development proposed at the time. Public transport provision is an important consideration. The concern about aircraft crashes and terrorist attacks is noted.

22 Resident

As a long time resident of Mildenhall, I would like to make the following comments regarding the above. I cannot go to the Council Offices or recreation way as I am disabled. Wonder if I am alone with these thoughts?

Your colour plan was difficult to decipher, very small print. The Bury Free Press coloured map much better and clearer.

The Council Offices where situated now are convenient for the many people living in or near the College Heath Area of the town, for not everyone has a car and it is a long way to cycle or walk especially for the elderly. Likewise the Police Station/Clinic/Library. There will be more traffic through the town.

The Fire Station is quite central now. Retained Fire-Fighters are on call 24/7. They are hard to recruit for extensive training/medical, as not all employers will release staff during working hours. Without a full crew they cannot attend therefore other stations have to respond. There are many accidents on the A11 and minutes saved count. I am familiar with this as my son served for 25 years.

Along with Alconbury, Molesworth, Mildenhall Base is due to close in 2020, although Lakenheath extended. I am familiar with Mildenhall Base as I was employed there as a Clerical Officer, M.O.D, for 24 years. Plans for this area are housing. Will access be on West Row Road or Beck Row? Staff parking at the Hub will have to be very large for staff and public. More arable land lost, pity there is no brown site available.

It is acknowledged that the location of the Hub will not be so convenient for those people living on the eastern side of town. However, it is still reasonably accessible, being a short walk from the town centre. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety, including crossing points. Sections 6.1.1 and 6.1.2 will be amended to reflect this.

23 Resident

After reading the document available on the website, I am very much in favour of the developments going ahead, but would like to make a number of comments/suggestions:

- The design of the leisure facility, including the swimming pool, needs to allow easy
 access for the school and be large enough so that the facilities can be easily used during
 school time by both the school children and other users
- A 8-lane pool, with electronic timing, spectator seating for around 300 and a hall close by (for swimmers between races) would allow the pool to be used for regional galas and would bring in more revenue; both Ipswich and Newmarket need to restrict spectators for larger gala
- A 8-lane pool would also allow the pool to host both public swimming sessions and either pool lessons or the swimming club training
- With a moveable floor in the learner pool, diving boards could also be provided (as in Cambridge), which would provide a much needed diving resource in Suffolk.

The design and specification for the leisure facility will be addressed once the general principles of the hub have been established.

24 Stakeholder Group

Mildenhall Sharks Swimming Club would like to be actively involved in the design and specification of the proposed Hub. Since the replacement of the existing Swimming Pool is high on the list of priorities, then it's disappointing that Mildenhall Swimming Club, as a major user of the current pool, have not received an invitation to participate in these discussions.

The design and specification for the Hub will come at a later date. However, your interest in this process has been recorded and will be followed up.

In terms of a wish list, then it would be good to see:

- an eight lane 50m pool, complete with learner pool (adjustable depth),
- adequate seating (~500 seats) to be able to host major swimming events, such as Suffolk County Championships, Suffolk Masters, ASA East Region Championships, East Region Masters Championships.
- It would be good to put all the Mildenhall Sports Cubs under "one roof" Soccer, Rugby, Hockey, Cricket, Cycling etc. The current situation with clubs being spread out across Mildenhall and Red Lodge misses on opportunity for synergy, and is is a very inefficient.

25 Resident

My wife & I attended the Open Forum regarding The Hub on 6th April at the Jubilee Centre, since when we have been away, so these comments may be rather belated.

- (1) Please pass on our congratulations to the FHDC representative being able to field so many negative comments during the time during which we were present.
- (2) "The Hub" is a good idea, (although due to our ages whether we will live long enough to see the fulfilment must be uncertain.)
- (3) The following Comments/Questions we would like to raise.

was made the main Academy entrance.

- (a) Queensway as the main access road to the site from the town. For Emergency Services, (Fire & Ambulance), fast movement from the Hub is necessary. At a point approximately 40 yards East of Wamil Way there is a regular "bottleneck". Parking vehicles there regularly cause tailbacks in either direction. So unless some permanent 'No Parking' could be imposed or ultimately even a Compulsive Purchase Order on the two properties involved this "bottleneck" could prove to be a real problem to the Emergency Services. (b) Wamil Way needs to have some form of restriction on it eg:."Access to Residents Only" to prevent another potential bottleneck. This used to be the case before Sheldrick Way
- (4) A comment made to another member of the Public was that each of the present sites eg: Schools would be redeveloped.

Approximately 8 years ago I had cause to look into the Archives & Records of the Bunbury family. I discovered that the Bury Road site was given to Mildenhall by the Bunburys to be retained for the youth of the town in perpetuity. Obviously an Academy fulfils that obligation, but has this matter been considered for any future redevelopment of that site?

Thank you for your positive comments. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. Your information relating to the potential for a restrictive covenant has been forwarded to Suffolk County Council for further investigation.

Thank you for advising me of the Draft Development Brief for the proposed Public Service Hub in Mildenhall.

My only immediate interests would be around permeability in creating numerous "convenient through routes". I appreciate the balance between permeability and accessibility is always a delicate one. We (policing) want less permeability as it creates entry and escape routes for those who may want to commit a crime. For planners it is about the green agenda, being able to get people from A to B, preferably not in their cars. We cannot demand reductions in permeability without having evidence that this is the only option. What we can do is look at the design of walkways, lighting, surveillance and the security of surrounding properties to ensure that any permeability is as safe as it can be and that the offender will stand out in a well-designed community. There is no blanket approach, site specifics apply, based on the crime rate and local context. Consideration should also be given around the "gathering/meeting spaces with seating" ensuring that it could not lead to future ASB issues and that large car parking areas should be registered to the Safer Parking scheme to obtain the Park Mark accreditation. I note that the application is considering BREEAM and would strongly recommend that this is applied, along with the requirements for SBD Commercial 2015v2. I or my colleague Phil Kemp would be happy to work with yourself and the planners throughout this process.

Thank you for your observations. The balance between accessibility for all and crime reduction can be a fine one, which will need to be fully considered at the detailed design stage. This will be carried out in close consultation with the Crime Reduction Officer.

I have several comments to make re the proposed hub

- 1. Traffic concerns along Queensway. Traffic is already bad at peak times. Exiting from Wamil Way is hazardous and action will be needed to slow traffic down and create a safer junction. When I mentioned this at the consultation at the Jubilee Centre I was told this was not part of the consultation. If this is so why not? Wamil Way is, in effect, a single track road with passing places and it provides the only vehicular access to the Cricket Club, Cycling Club, Bunbury rooms and the Church.
- 2. I also asked about the Wamil Court site and was received the same response. Again why not?
- 3. Should there be a Blue light call out at the same time as school buses are using Queensway it would be chaotic and any vehicles would have to cross town, via Police Station Square to get to the A11 the most likely site of a major accident.
- 4. The proposed site would create problems for young mums and elderly folk to get to. These groups are least likely to have access to a car and the distance would discourage use of the facilities. Currently all areas of Mildenhall are within reasonable walking distance for most residents. How many of the officers and councillors ever walk from St John's Close to Comet Way? 5. Why does the school need to be with everything else? It could be united in Sheldrick Way and if the Wamil Court Site was incorporated into the site there would not be so much loss of good farm land which will be necessary to feed an increasing population.
- 6. Why is it considered necessary or helpful to put everything on the one site? It will create a traffic nightmare wherever it is. At least if the college was in Sheldrick Way and the rest on College Heath Road the traffic problem would be mitigated.

What seems so strange is that there seems to be no overall strategy for the future development of the town. The proposed closure of the base, the future of Wamil Court site, traffic issues were not to be questioned, they were not part of the discussion! This is not joined up thinking and reflects very badly on the decision making process.

I am very concerned about the whole so-called consultation process as I have met residents who are unaware of what is under discussion as they don't get a local paper, surely with such an important decision to be made it should be advertised. It suggests to me that the desire is that as few folk as possible get involved until it is too late, which makes one very suspicious. What vested interests are at work?

Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. Whether the police and fire service sign up to the proposal is entirely their own decision, based on their operational requirements. It is acknowledged that the location of the Hub will not be so convenient for those people living on the eastern side of town. However, it is still reasonably accessible, being a short walk from the town centre. The benefits of the hub are clearly set out in the 2014 Business Case (as updated in 2016).

Thank you for the opportunity to comment on the draft Development Brief for the proposed Public Services Hub at Mildenhall. We note there is a section on Utilities (3.7) that has not yet been completed that will need

Thank you for this information.

It is recommended consultation with Anglian Water in regard to water supply and foul drainage to serve the Hub. Anglian Water provide a pre planning service for developers and details can be found at: http://www.anglianwater.co.uk/developers/pre-planning-service-.aspx

to confirm the provisions for water supply and foul drainage.

There is a public sewer crossing through the site from east to west that will need to be considered in the layout; the sewer is protected by an easement strip either side of the pipe. If the layout cannot be arranged around this sewer and associated easement, then diversion may be considered under the provisions of the Water Industry Act 1991 (section 185).

Reference is made to the use of SUDS for the disposal of surface water so it is assumed the services of Anglian Water in this regard will not be required.

Location of Hub: a) Is this the best place? The site is furthest away from better access roads We are aware that the council owns this land and will be more profitable to the council for hub use and possible housing development than leaving as agricultural land

b) Mildenhall will undoubtedly expand Reading the Eastern Daily Press the A11 corridor is now dubbed the Technology Corridor as expansion of technology will impact along that route to Norwich This will inevitably mean more houses Houses mean people who require health services schools and an increase in cars It seems that the Hub is the gateway for a lot more development along the West Row Road How will the infra-structure deal with this

- c) Will children from West Row be in the catchment area for school coaches and if not what would be the plans to get to school?
- b) What about the base ?It would be a better place to have a Hub The government declared it was for building houses Why not use it? Traffic:
- a) As you are well aware many changes would have to take place just to accommodate the hub traffic Big changes would be required at Police Station Square to keep a flow of traffic
- b) Roadside parking on Queensway would have to come under review and then enforced
- c) Exiting Wamil Way a clear view is needed and backing up of traffic to exit Wamil Way is a problem
- d) If alternative parking was advised I e in the entrance of Riverside School This would be extra cost to the residents and safety to self and car Others may decide to park in a residents parking space Occasional parking would have to be considered for church occasions and the use of the Bunbury Rooms
- e) There are plans for house building in West Row This would further compound problems with extra cars entering town via Queensway

Pedestrians:

Church Walk is envisaged the main footfall to get to the hub As we know Church Walk has been a very neglected road as far as repairs and general changes are concerned Parking around the Bunbury rooms is chaotic with implications to the entry to the church This area needs to be urgently reviewed

Although the intention is to get more people to walk to the hub what we know of human nature cars will always loom large in taking and picking up to a venue Rubbish has always been a big problem in Church Walk

We would like the council to think very carefully This development will be very far reaching

It is acknowledged that the location of the Hub will not be so convenient for those people living on the eastern side of town. However, it is still reasonably accessible, being a short walk from the town centre. It is also the only site of sufficient size capable of accommodating the Hub. The benefits of the hub are clearly set out in the 2014 Business Case (as updated in 2016). The future of RAF Mildenhall will not determined for a number of years yet, but the new facilities are required now. However, they may have a role to play in the future. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. Parking options in Wamil Way have been given further consideration, following consultation and Section 6.1.4 amended accordingly. This may also help to address parking and traffic in Church Walk.

and needs to be right for Mildenhall We came from a Market town in NorfolkThe town grew very fast, planning lacked thought hence the town has lost its character the traffic has to go through the centre of town which then becomes grid locked crossing the road is hazardous visitors are deterred to the town as they sit in traffic queues We would hate to see this happens in Mildenhall

As invited in the circular letter of 4th March 2016, my comments on the draft development brief are set out below. Crucially, the letter describes the proposed hub as an 'ambitious concept' but it doesn't explain the aims of such a concept. I would appreciate it if you would let me know why the proposed hub is considered necessary but in the absence of this information my comments are mainly concerned with the impact of such a hub on Mildenhall and its residents and guess work as to why this hub is being proposed. Aims

- I have heard it mentioned at drop-ins that some of the present buildings, eg, school, swimming pool, have reached the end of their lives. Buildings do not die but they do need to be maintained and repaired - as in time will the new proposed buildings in the hub require upkeep.
- Closer working for services, etc., is already achieved with email, skype, etc. and there are existing venues in town which would accommodate shared training.
- It is not unreasonable to suggest that not all residents would relish such a public venue for accessing services eg. health centre Choice of Site
- Mildenhall is an historic market town with its character developed over centuries. The proposed hub will endanger this heritage and is better suited to a 'new' town where grouping of services is a priority.
- One of Mildenhall's greatest charms is that open countryside and the River Lark are in close proximity to the historic town centre. This ease of access is a precious amenity for both residents and visitors. Using the proposed green field site for the hub would destroy the pleasure experienced by walkers and cyclists alike on the first section of the bridle path from Mildenhall to West Row.
- This green field site is currently used for agricultural production and is a favoured site for skvlarks.
- This rural area is gradually being whittled away by a variety of proposals for development. I understand that these development plans, including the hub, are all treated as discrete applications but taken as a whole there is a great danger of ruining Mildenhall's rural assets. Although the future of the air base appears to be uncertain, there is a strong sense of frustration at the Council's unwillingness to wait for the outcome, continuing to consider the destruction of greenfield sites which will never be restored. Traffic
- Having all services, etc. on one site to the west of town will do nothing to improve footfall through the town centre rather it will increase traffic along Kingsway.

The benefits of the hub are clearly set out in the 2014 Business Case (as updated in 2016). This also explains what is meant by the 'end of life' for buildings. The setting of Sheldrick way and its relationship with the historic character of Mildenhall town centre and Conservation Area together with the natural character of the countryside and River Lark have been significant considerations and are fully addressed in the Development Brief. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. Sections 6.1.1 and 6.1.2 will be amended to reflect this. Parking options in Wamil Way have been given further consideration, following consultation and Section 6.1.4 amended accordingly.

- The roundabout at the start of Queensway is barely workable at present and would not sustain the extra traffic, including emergency vehicles, entering and exiting Queensway. Is it to be suggested that more buildings are to be demolished here?
- On street parking is essential for residents of Wamil Way where off street parking is limited. I am a pensioner and live in Wamil Way and I would find it extremely stressful and dangerous to park further away from my home after dark.
- Although school buses use Sheldrick Way to reach the 6th Form Centre, many cars use Wamil Way to ferry children using the footpath to and from school. This traffic would be exacerbated with more schools and extra service users at the hub.
 Conclusion

Although the aims of the proposed hub are unclear, the disadvantages appear obvious.

- Destruction of green field site with associated loss of agricultural production, flora and fauna.
- The 'market' and historic nature of the town compromised.
- Numerous traffic problems.
- Service users' privacy affected by the public nature of the venue.

Thanking you for your kind attention and I look forward to your comments.

Thanks to Alex Wilson and Chris Rand for attending the meeting at the Cricket Club on Wednesday 20 April to explain about the Hub and for listening to points raised. If a Hub is such a good idea why have no other small towns not adopted the scheme?

- 1) The theory is good but having so many amenities together makes a hub vulnerable to disasters i.e. aircraft crashes, terror attacks, fire and floods.
- 2) Would it not be cheaper in the end to repair existing public buildings, as and when the need arises?
- 3) The present Medical Centre, Council Offices, Library, Ambulance parking and Police Station are convenient for a large proportion of citizens, many of whom are not car owners, and also near bus stops. For car drivers the present locations allow for dispersal of traffic rather than concentration of vehicles into one entrance. This is a very important consideration for fire engines and ambulances.
- 4) How will mothers with push chairs and small children reach the Hub medical centre from the College Heath road area or attend Library Sunday morning craft activities? There are no buses on Sundays.
- 5) Repairs and maintenance to any part of the Hub will inconvenience the whole complex i.e. parked lorries, machinery, work in progress, road repairs and blocked path ways.
- 6) Parking seems adequate and accessible at the present Council Offices area. Between 4.15 and 4.30 on a Thursday afternoon I counted roughly 130 spaces (not including area next to present gym.) There were roughly 75 parked cars including 2 ambulances. Would the Hub be able to allow for 130 wide spaces which would have to cope with traffic for the swimming pool, police station, fire station, school etc. plus deliveries to Medical Centre, Library etc.?
- 7) The proposed schools and swimming pool, gym are a sensible solution but not any more amenities.
- 8) Any further development of west Mildenhall with all the extra vehicles is unacceptible in this historic and attractive part of the town.

Rather keep it as it is and improve the roads first. Traffic control here and in Mildenhall surroundings needs urgent attention.

The hub idea is too piece-meal - putting the cart before the horse.

Any loss of agricultural land (included the allotments) should be avoided.

The benefits of the hub are clearly set out in the 2014 Business Case (as updated in 2016). However, the concerns about congestion will be addressed through a detailed traffic assessment. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety, including crossing points. Sections 6.1.1 and 6.1.2 will be amended to reflect this. The suggested road priority changes shown at Figure 6.1 should help address the current issue relating to traffic speed and may address the Comet Way junction. This will also be subject to consideration as part of the traffic assessment. Parking will be required in accordance with adopted parking standards, which include wider spaces. This level of detail will be required at with any subsequent planning application and will be related to the development proposed at the time. Public transport provision is an important consideration. It is acknowledged that the location of the Hub will not be so convenient for those people living on the eastern side of town. However, it is still reasonably accessible, being a short walk from the town centre. The concern about aircraft crashes and terrorist attacks is noted.

After attending the meeting last Wednesday at the Cricket Club, I would like to make some comments on the proposed Mildenhall Hub draft development brief, particularly about these specific areas:

- 1. Renewable energy design in relation to total cost of ownership. The refurbishment of the Jubilee Centre incorporated solar PV, underfloor heating, and upgraded insulation. Use of measures as close as possible to zero carbon Pasivhaus standards will not only reduce the carbon footprint of any new buildings, but can save substantial amounts in energy costs over the life cycle of those buildings. Energy and environmental conservation should be a top design priority. An architect with experience in these areas and with a record of successfully completed projects should be chosen.
- 2. Allowance in design for future growth. The town lacks a public venue commensurate with its present population, as the Jubilee Centre and Dome are 1970s era relics built for a much smaller community. If growth occurs, the "hub" must be designed so the facilities can be expanded to accommodate the demands of higher usage. Only the clinic seems to have grasped this reality and allowed for it in its proposal. The ability of the proposed design to cope with growth in demand due to population growth over the expected life of the facilities
- 3. An alternative bicycle and pedestrian route from the town to the hub should be offered. Church Walk is a single lane cul de sac, with little room for pedestrians and cars to negotiate. In practice, it is not normally possible for cars and pedestrians or bicycles to pass each other in the narrow road width available, and one or more must give way, causing delay as one party must wait for others to pass by. The blind entrance from Wamil Way and the lack of suitable turning space at the church end of this passage mean it is now and could become an increasingly difficult bottleneck if traffic is increased due to relocation of vital services to the hub. The possibility of an alternative pedestrian and bicycle route exists, if a path were made from Wamil Way through the land outside the boundary wall bordering the land where a planning application has been submitted for 14 houses, and joining the High Street by going through the Mill Gardens site. Alternatively, a route which would start near the church end of the passage might be feasible if residents were willing to contribute some of their land to make it possible.
- 4. Provision of transport for people from areas which are convenient to existing facilities but will probably not be as convenient if those facilities are moved to the proposed new location. For many residents, including those who do not own cars or are disabled, getting to the new location may be a significant problem. A new bus service to the new location appears to be left up to private firms to decide. For some people, this transportation

The introduction of insulation and sustainable heating systems to improve energy efficiency is only one aspect in relation to the use of existing buildings as is explained in the Business case. It is agreed that that capacity needs to be retained to allow the hub to grow in the future to meet increased demands from the town. This has been addressed by an addition to Section 6.3.1. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. This would include the impact of development upon Church Walk and Wamil Way. It is acknowledged that the location of the Hub will not be so convenient for those people living on the eastern side of town. However, it is still reasonably accessible, being a short walk from the town centre. Public transport provision is an important consideration. The future of RAF Mildenhall will not determined for a number of years yet, but the new facilities are required now. However, they may have a role to play in the future.

question may be a big issue, which needs to be addressed.

5. A coherent plan for the surrounding area. Less than one mile from the proposed site, a state of the art gym and sports fields lie just off the West Row road, right inside the perimeter of RAF Mildenhall. If some of the base is to be released by the MOD, and that gym were to be part of the area released, this would be a tremendous asset to the local community. I would offer an alternative to the facilities being planned, one which could help provide for future growth. Instead of a piecemeal approach in which individual developments such as the current planning application for 14 houses off Wamil Way and another for 1,000 houses off the West Row road are undertaken in seeming isolation, an articulated overall plan which addresses the combined impact of the closure of RAF Mildenhall, the additional housing construction, traffic and access issues, and this proposed development is needed.

Thank you for taking time to consider these comments.

I have reviewed the proposals for the hub and am generally supportive.

I live on Boeing Way and am concerned about the effects on traffic onto Queensway from Police Station Square, especially if Emergency Services need to use this route – it becomes easily congested at busy times. This does not appear to have been considered in the report at this stage. The traffic entering Queensway from Mildenhall Town Centre also can be difficult because of the way the traffic has to cross the High Street as it leaves the Mini-roundabout.

As a Steward for Mildenhall Methodist Church, in the triangle between High Street, Queensway and New Road, I am concerned about the effects this may have on access to our church, and on the physical fabric of the building.

I enjoy swimming and am a Member of the Mildenhall Sharks Swimming Club where larger and improved facilities will be welcome most of our training sessions are full in the current pool.

It would be wonderful to have a 50m pool, but a 6 or 8 lane 25m ASA approved competition pool will improve our opportunities to teach and train young and adult swimmers to improve the standards of swimming.

The size of the pool is an obvious constraint, the size of the spectator area is also a significant constraint, we have to limit the numbers of competitors family at any event because of license limitations on the number of people allowed at the current pool. I also swim in public sessions and the pool is often busy, making swimming at my own pace difficult.

I am surprised that the Academy does not prefer to bring the Sixth forms closer to the Bury Road site for better cohesion and economies for teaching staff.

What consideration is being made to account for the reported "partial closure" of RAF Mildenhall and the resultant reduction in USAF personnel?

Bringing all the services together will be beneficial, and I hope that the spaces freed up will be well used for the good of the community.

Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety, including crossing points. Sections 6.1.1 and 6.1.2 will be amended to reflect this. The suggested road priority changes shown at Figure 6.1 should help address the current issue relating to traffic speed and may address the Comet Way junction. The design and scale of a replacement swimming pool will be a matter for detail design at a later stage. The choice of Sheldrick Way over Bury Road for Mildenhall Academy is addressed in the Business Case. The future of RAF Mildenhall will not determined for a number of years yet, but the new facilities are required now. However, they may have a role to play in the future.

I recently attended a drop in session on the 7th April regarding the new hub that is proposed to be build in Mildenhall.

Following the discussion that took place and my following research, I have some concerns regarding the hub and wondered if you could rectify these for me. Please see my list below:

It was stated there will be public consultations between 7th March– 25th April. During my research your website specified that the key factor for the success of any proposals is linked to the chance for local people to comment through any future consultation on the LDF. Your "risk/opportunity assessment" also mentioned that failure to engage partners and local people in the project would be classed as "medium". The control measures were to incorporate strong communications and consultations in the project. I believe that one drop in session on the 7th April does not constitute strong communication and you have failed on this front.

Following the research I have conducted, I approached a considerable proportion of the pubic to ask them if they had received information regarding the new hub. The majority of people I spoke to had no idea of the proposal and were not informed of the drop in session on the 7th April. It was only by chance I found out about the session myself. Marketing and availability of public information was extremely low key. There were no advertisements to say what a wonderful opportunity for Mildenhall this was or information of how the tax payer will save money. The public were also not given the opportunity to voice any concerns. In order to overcome this, I would propose that further consultations take place in the near future, with more advertising given to the public. A adequate way to do this would be through posters at central areas or specific advertising at public places, councils and newspapers.

- Would infrastructure be improved in order to accommodate the Hub. Planning and highways requirements would need to be adhered to and what are the proposals to alleviate traffic following this change?
- Does the total proposed cost given include allowances for road improvement, procurement, VAT, removal and relocation of all facilities, architect fees and engineer surveys?
- Have you had a full transport assessment from the WSP to get a full overview and detailed assessment of the impact of the Hub and also the cumulative impact of future growth to the west of Mildenhall.
- Would the site require archaeological assessment prior to any planning application and if there were any items of interest to be found, would this need further investigating

The consultation process was carried out in full accordance with the adopted Statement of community Involvement and included direct letters to people living close to the site. The public engagement has been well supported and officers have attended an additional residents' meeting following their request for such. The Public Services Hub is a project to provide essential infrastructure for an expanding town. It will be required to make appropriate and proportionate improvements to highway infrastructure. The costs and fees are a matter for the business case, not the Development Brief. An archaeological assessment is required and will be carried out. There is no proposal to move the allotments. Wamil Court Care Home has nothing to do with the Hub project. All matters relating to funding are addressed by the Business case and fall outside the consideration of this Development Brief. A full ecological survey was undertaken in 2015 and forms Appendix 1 to the Development Brief.

and thus delay the project?

- 6) Will the allotments be relocated to make way for complementary housing?
- 7) Will the Wamil Court Care Home site be for private housing, social housing or both?
- 8) Are FHDC funding or borrowing the majority of the costs incurred? Will this still make a saving to the tax payer?
- 9) Is there potential to deliver commercial office space?
- 10) Are there plans for transport services to/from the Hub?
- 11) Queens Way and Wamil Way will be considerably busier. What will happen to the off street parking?
- 12) Most traffic will go to the mini roundabout at Police Station Square or use alternative routes such as Comet Way to avoid the town centre. What are your plans to ease considerable congestion?
- 13) For the local farmers whose land will be commandeered, would the council be offering alternative land or compensation in order to accommodate the considerable disruption caused?
- 14) Has a survey already been completed on the proposed land in order to identify and protected wildlife species?
- 15) Who would be the legal owners of the hub?
- 16) What would happen if the desired funding could not be acquired?

Thank you for your time in reading my email and answering my questions. I look forward to your response.

Sport England aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result of redevelopment; to ENHANCE existing facilities through improving their quality, accessibility and management; and to PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future. Further information on Sport England's objectives and planning policies relating to sport can be found here:

https://www.sportengland.org/facilities-planning/planning-for-sport/
Sport England is supportive of the principle for the proposal for a public service hub in
Mildenhall (including new community indoor and outdoor sports facilities) for the following
reasons:

- The scheme is supported in terms of an evidence base via the recent studies carried out by West Suffolk Council (Playing Pitch Strategy and Sports Facilities Strategy),
- The proposal will result in a qualitative improvement in terms of the sports offer for Mildenhall, replacing existing ageing facilities with new fit for purpose facilities,
- The proposal will offer significant improvements in terms of the management and maintenance of sports facilities, being concentrated onto one single 'hub' site, serving the whole town

We acknowledge that the project is only in draft form at the moment, therefore Sport England reserves the right to further comment with regard to the proposed facility mix on the site (which should reflect identified strategic priorities) and the design and layout of the site and facilities (which should meet Sport England technical guidance documents, which can be accessed here: https://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/

Please note also that any support given by Sport England in terms of the planning proposals does not indicate that Sport England would support any proposal for funding towards this project, as this would be considered against separate criteria.

Thank you for the support and offer of further participation.

Thank you for consulting us on the draft development brief for the proposed Public Service Hub at Mildenhall.

We have reviewed the development brief and our advisory comments are set out below. Contaminated Land

The site is located above a Principal Aquifer and within Source Protection Zone (SPZ) 3. Therefore, risks to controlled waters from contamination at the site should be addressed following the requirements of the National Planning Policy Framework and the Environment Agency Guiding Principles for Land Contamination, which can be found at https://www.gov.uk/government/publications/managing-and-reducing-land-contamination. The NPPF takes a precautionary approach to land contamination. Before the principle of development can be determined, land contamination should be investigated to see whether it could preclude certain development due to environmental risk or cost of clean up (remediation).

Where contamination is known or suspected a desk study, investigation, remediation and other works may be required to enable safe development (Paragraph 121 of the NPPF). Our minimum requirements for submission with a planning application where contamination is suspected are a desk study and preliminary risk assessment such as a site walkover or conceptual model.

Site Investigation and Remediation Strategy reports may be required for submission with a planning application for sensitive land use types or where significant contamination or uncertainty is found. The local council's Environmental Health team may hold records on locations of known / potential land contamination. If during site works contaminated material is suspected, you are advised to stop works and seek further guidance. Remediation of contaminated land may require an authorisation under environmental permitting legislation.

Surface Water

The implementation of Sustainable Drainage Systems (SuDS) should be carefully considered. These techniques can provide a method for reducing runoff that could otherwise lead to flooding. They can also minimise pollution impacts, improve biodiversity and provide amenity areas.

If infiltration drainage is proposed then it must be demonstrated that it will not pose a risk to groundwater quality. We consider any infiltration SuDS greater than 2.0 m below ground level to be a deep system and generally not acceptable. All infiltration SuDS require a minimum of 1.2 m clearance between the base and peak seasonal groundwater levels. All need to meet the criteria set out in our Groundwater Protection: Principles and Practice

Thank you for your positive observations and advice.

(GP3) document1. In addition, they must not be constructed in ground affected by contamination.

Foul Drainage

The site is located in an area served by the public foul sewer. In accordance with the NPPF Planning Practice Guidance, new development should be connected to the public mains (with the prior written approval of the statutory undertaker) where possible. Proliferation of individual treatment plants can cause deterioration in local water quality (ground and surface water). This would be contrary to the principles of the EU Water Framework Directive2. Some 'non mains' foul water drainage systems will require our prior written Consent. Consent is required irrespective of planning approval. Works in proximity to Main Rivers

Under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, our prior written consent is required for any proposed works or structures in, under, over or within 9 metres of the top of the bank of the River Lark. Our consent may also be required for works more than 9 metres away which might affect the structural integrity of the bank, for example excavations. Please contact us at PSO-Brampton@environmentagency.gov.uk should you wish to discuss your proposals.

The references to existing public facilities spread across 8 separate sites is inaccurate and misleading. In practice there are 5 sites as the Mildenhall College Academy site in Bury Road also houses the Dome Sports Centre and the present Council Offices, library, clinic and police station are on adjacent sites and effectively form one complex, which is more central for a majority of residents and has better road connections. The site in Sheldrick Way would be less suitable than the current site for the fire station due to the poor road connections.

The proposed site for the Hub is NOT a central site, it is on the current edge of town and only convenient for a relatively small number of residents living on the western side of the town. Relocating facilities to this site will probably decrease pedestrian access to the facilities and increase vehicle use.

The site has poor road connections.

QUEENSWAY

Queensway is not a suitable access for the amount of development proposed by the Hub project and the housing that is being considered on sites to the west of the Hub site. Although Queensway is wide for part of the route there is much parking along it and there are pinch points where the road narrows. The junction with the High Street close to the mini roundabout at Police Station Square is totally unsuitable for an increased volume of traffic and the whole junction would need to be considerably improved before any development that increases traffic flow is permitted.

Consideration should be given to forming a roundabout at the junction of Queensway and Comet Way to slow down vehicles entering Mildenhall from the West Row direction and realigning Sheldrick Way to enter Queensway at this roundabout.

CHURCH WALK

Church Walk is a single track road with few passing places and extremely restricted visibility at the junction with Wamil Way. There have been minor accidents and near collisions at this junction and the increase in cycle and pedestrian use proposed by the hub will necessitate very careful management if accidents are to be prevented. In addition to traffic associated with dwellings in Church Walk, the road also serves the

Church (including wedding and funeral cars), the Almshouses, some properties in the Churchyard and the Bunbury Rooms, which is home to a dance school and various other groups, all of which generate vehicular traffic. It is not uncommon for traffic entering Church Walk to reverse into Wamil Way to allow traffic to exit.

The Road Safety Report commissioned by local residents in response to a recent planning application recommended improvements to this junction and these should be implemented

It is accepted that some facilities share a site and others are located in close proximity. However, none of the existing site except for the fire station could be regarded as central for the entire population of Mildenhall. There are no central sites available for a Hub, but Sheldrick Way is well located and close to the town centre. It is also well located to serve additional growth to the west of the town. Any development of the site will require further traffic assessment, including the impact of traffic on Queensway and any improvements required on the road network, both for traffic movement and pedestrian safety. This would include the impact of development upon Church Walk and Wamil Way. Parking will be required in accordance with adopted parking standards, which include wider spaces. This level of detail will be required at with any subsequent planning application and will be related to the development proposed at the time. The height of individual buildings will be the subject of individual impact studies as the appropriate time. Section 6.3.3 is amended to address this. Option 3 for the complementary housing has been removed and parking options in Wamil Way have been given further consideration, following consultation and Section 6.1.4 amended accordingly.

in full if any increase in use of Church Walk or Wamil Way is permitted. The opportunity could be taken to realign Wamil Way to include a "build-out" as suggested in the report at the same time as changes to the old school access are carried out.

CAR PARKING

P.23 states that "Proposals for a mixed use site will be expected to minimise provision of car parking where achievable". The idea that car parking on the site could be minimised would be totally unrealistic and unachievable as the school and offices will be in use throughout the working day, when facilities such as library and swimming pool will presumably also be open.

P.40 refers to 10% of parking spaces in a preferential location being reserved for electric vehicles and also preferential parking being allocated for very small vehicles (under 3 metres) and car sharing. Electric and very small vehicles are more suited to urban areas and are uncommon in rural areas. The idea of preferential parking for such vehicles would seem to be idealistic and impractical.

WAMIL WAY

Re-development of the Wamil Court site will cause increased traffic in Wamil Way, as would the development proposed in the current planning application for land to the south of Wamil Way. Sites 2 and 3 shown as possible sites for complementary housing in the Hub Development Brief would also add to traffic in Wamil Way and are therefore not ideal sites for housing, however these sites would have a far safer access than the current application site to the south of Wamil Way.

While there would be a very small traffic reduction if the pre-school is moved to Sheldrick Way, this is unlikely to improve the already difficult traffic situation in Wamil Way. Site 3 proposes the removal of the off street parking area in the old school entrance. This parking area is frequently used overnight by residents who have no off street parking and by some residents of the Almshouses. It is also used for Church parking and by some users of the Bunbury Rooms.

The junction of Wamil Way and Queensway is a tight turn when entering Wamil Way from the east, causing many vehicles to encroach onto the west side of the road. The top end of Wamil Way has necessary on street parking where residents have nowhere else to park, but this reduces the road to a single lane which frequently causes traffic to reverse back into Queensway when faced with traffic turning out of the road, or to reverse down Wamil Way to Bridewell Close. Any increase in traffic flow along Queensway will have the effect of making it more difficult to exit Wamil Way, which will exacerbate the existing traffic problems in Wamil Way.

SCALE AND MASSING

Although the development brief states that most of the Hub development should be no more than 2 stories high it also suggests that 25% of buildings could be 3 or 4 stories high. We are concerned that 4 storey buildings would appear too dominant and would compromise the views of the Church tower which are an important feature of the flat landscape to the west.

OTHER ISSUES

We suggest that the following should be considered as part of the overall plan for this development and the town:

- If the Hub project is granted planning permission and new housing is being planned on the western side of town a western link road will be necessary, ideally from the Red Lodge junction on the A11, passing to the west of Worlington and linking with the West Row Road west of the town. This would help to relieve the otherwise unacceptable pressure on Queensway and Police Station Square. It could also link into the industrial estate, and possibly be made to join with the A1101 on the Littleport side of Beck Row, forming an effective western bypass for Mildenhall, Worlington and Beck Row.
- Improvements to the old school access from Wamil Way to include a more efficient parking layout, improved landscaping and lighting.
- A green buffer zone between the proposed Hub development and proposed new settlement boundary and the existing footpath / bridleway / cycle path to West Row to maintain the amenity value and rural nature of the path and riverside area.
- Extend pedestrian paving across High Street and King Street for the east-west link via Market Place and Church Walk, with traffic speed reduction platforms in both roads. This could have significant townscape benefits if done in a sensitive way similar to the pedestrian friendly area between Angel Hill and the Abbey Gardens in Bury St. Edmunds.
- Improvements to Police Station Square to improve traffic flows, enhance the townscape and facilitate pedestrian crossing routes. This would also benefit the setting of nearby listed buildings and the war memorial.
- Liaise with Mildenhall Cycling Club to ensure that a suitable location for the Mildenhall Cycle Rally is maintained in the town, as this is a national event which encourages tourism and as such should be encouraged.
- To encourage tourism in the town could consideration be given to the provision of a camp site, either on part of the old school site or associated with the Hub site.

STRATEGIC PLANNING

In addition to the "Hub Draft Development Brief" consultation is currently taking place on the "Site Allocation Local Plan: Preferred Options" which proposes an area to the west of the Hub site, extending to Wamil Road, for 1,250 new houses, presumably a population increase of approximately 4,000 – 4,500 persons. It is known that Wamil Court will be redeveloped, plus possible Hub related complementary housing being put forward in the Brief. There is also a planning application for housing to the south of Wamil Way (not a preferred option site in the Local Plan) and applications for significant housing in West Row, together with the possibility of MOD land being released between Mildenhall and West Row.

Taken together this will have a dramatic effect on the western side of Mildenhall and traffic volumes in Queensway and West Row Road. All of these suggested sites and applications should be considered as a whole, not piecemeal, so that housing can be built in the best suited locations and open areas retained where desirable, and that appropriate infrastructure improvements are made. It is critical that Planning Control should grasp the bigger picture to endeavour to deliver outcomes that are best for the current and future population, rather than the result of speculative applications by land owners and developers.

Thank you for inviting Suffolk County Council to review and respond to the draft Development Brief (the Brief). The County Council remains an active and supportive partner of the Hub. The One Public Estate (OPE) programme is important, not just for Government and the family of local government, but for all bodies delivering public services. It is particularly relevant to benefits reform, digitisation, as well as health and social care integration, which is of vital importance to Suffolk County Council. Alongside the new homes and jobs currently programmed in Forest Heath's adopted and emerging local plan, the delivery of the Mildenhall Hub is essential for the sustainable growth of the town. Given its role and location, the Hub is a keystone project for the future of Mildenhall and this Development Brief will be an important tool to help all partners work together to get the best development for the town.

The Brief is a welcome step forward and Suffolk County Council offers its resources to establish the right package to ensure the benefits are optimised and the impacts mitigated. The County Council has various roles and responsibilities that are directly linked to the development and to the preparation of the brief in general. Expertise within County Council can be used to shape the Brief if this would assist Forest Heath to progress the project.

Access and Movement

Transport matters are reviewed by the Brief. Further dialogue between county and district councils will help to optimise the opportunities to encourage more people to walk, cycle or use public transport. By way of example, the authors of the Brief highlight the need to improve pedestrian safety and that the site will need to be much more accessible with the development of the Hub.

A draft Transport Assessment was undertaken on the options for the Hub and for approximately 1,000 dwellings on West Row Road. An update to this assessment could help to reflect: Forest Heath's updated policy position on the distribution of new housing; the development of the Business Case, and what the resultant area of the Hub could be accounting for growth (e.g. the addition of the primary school).

Public Transport

The Hub concept would create a single destination for multiple journey requirements and, therefore, making services more viable. This is particularly relevant if services are to move away from subsidies. Further discussions are needed with the bus companies to work up

Thank you for the informative observations. In all respects, it is important that the Brief takes account of the need for flexibility in the delivery of facilities and allows for expansion within the site to meet future growth demands

an approach to the strategic future of local services that can then inform the final version of the Brief. Together with Forest Health, the county will open a dialogue with bus operators to identify how services could adapt to the integration of the Hub with the Town.

Rights of Way

The use of the rights of way network is vital to promote walking and cycling, not only as a more sustainable mode of travel but as a way to improve health. In 2014, the County Council completed substantial improvements to encourage people to walk and cycle between West Row and Mildenhall. This improved route has enhanced the level of accessibility to the site. In developing the hub project with Forest Heath, the County Council is open to commissioning an analysis of the need for further improvements to help more people to walk and cycle within an enlarged Mildenhall.

Education

The focus of the Brief has been on addressing the needs arising from the Business Case for the Mildenhall Hub. Acknowledgement could also be made to the potential for further growth in the demand for education facilities. The current emerging strategy from Forest Heath is for the Town grow by over 1,500 dwellings between 2011 and 2031, 1,350 of these would be new allocations that could include the adjacent land to the west of the site. Most of the sites included in the Strategic Housing Land Availability Assessment are on the western side of the town surrounding this site.

Pre-school

The Brief recognises that the existing pre-school would be relocated to the Hub. This is an existing facility providing 28 places. With growth, at least a further 81 (full-time) pre-school places would be required. The Brief could reflect the potential for this use to increase in size to accommodate increased demand from the overall growth in the town. This might affect the location and access priorities for the pre-school element of the Hub and connections with the primary school (if one is proposed for the site).

Primary

There are two primary schools with Mildenhall - Great Heath Primary School and St Mary's

Church of England Academy. Both these schools are currently providing space for a maximum of 420 places and will soon reach capacity. For Great Health, a project will start on site later this year to increase the permanent capacity of the school to 630 by September 2017. A new primary school will be required at Mildenhall if the town is to grow at the level currently proposed. The Brief recognises that a new primary school could be part of the Hub. The stage at which the new primary school is needed will depend on the rate that new homes are built. Officers from both authorities could work together on testing scenarios.

Secondary

The provision of all Mildenhall College Academy's post-11 education facilities to the site is a major component of the project. The current business case is for the new building to be suitable for 1050 secondary pupils (the current sixth form centre remains), but that the shared spaces to be used by the academy, such as the school hall and kitchens, are large enough to support 1500 pupils.

For each 100 new homes built, approximately 18 secondary and four sixth-form pupils would need places within local schools. Using 1,350 new homes as a guide, this would mean that a further 243 secondary and 54 sixth-form more pupils would demand places. However, this does not include growth from elsewhere. In October last year, the Cabinet of Suffolk County Council acknowledged that there is an emerging case for a much larger or even an additional secondary school to serve the Mildenhall, Lakenheath and Red Lodge area. With the publication of Forest Heath's preferred strategy, further consideration will be given by the County Council to what could be the right approach and how this affects the Hub.

The potential for the secondary school to expand to accommodate this growth has been included in the Business Case but only insofar as the core facilities have been designed for the growth. Further expansion will be required to accommodate the future needs to the town and its surrounding area. Such extensions as may be required would be undertaken in phases and financial contributions from development would be necessary.

Surface Water

The Brief does review the fluvial flood zones and illustrates how Sustainable urban Drainage Systems (SuDS) can be integrated into the landscape. As the Lead Local Flood Authority, Suffolk County Council will review the surface water drainage details and provide advice to Forest Heath as the planning authority. A flood risk assessment will need to be submitted with the planning application but, if the timetable allows, an illustrative drainage strategy could be a useful addition to inform the Brief. As partners to the project, the County Council will provide advice on the amount of open space likely to be required for open SuDS, which could be used in the Brief. The requirements of the Flood Risk Assessment can also be provided to inform any consultancy brief.

Archaeology

The Archaeological Service from Suffolk County Council has already provided advice for the formation of the Brief and highlighted the need for an archaeological evaluation. This allocation lies in an area of very high archaeological potential and, with regard to Policy DM4, there is not sufficient information available to confirm the archaeological impacts of the development proposed by the Brief. Without an evaluation being undertaken, the layout of buildings indicated by the Brief can only illustrate what may be possible.

Whilst such information might be made available prior to the determination of a planning application, a more appropriate strategy would be to undertake the necessary evaluation (e.g. metal detecting, geophysical and trial trenches) before finalising the location of buildings and other works. The Business Case does acknowledge the risk that, if anything of national importance is identified, the design of the development might need to change or the building work could be delayed.

To make progress and reduce the risk of delay to the project, the County Council will fund the archaeological evaluation. Given the areas outlined for development are currently arable or school grounds, the forthcoming summer period appears to be the most appropriate to undertake trial trenching.

Health and Wellbeing

The development of the Hub, with its focus on the provision of services, sport and education, will bring health-related benefits. A focus on health is particularly relevant to

Mildenhall. The Town has a lower life expectancy than other parts of Forest Heath, which is generally a healthy area, and higher – though not significantly higher - rates of premature mortality from heart disease than the national average. The role of the Hub in addressing health inequalities and promoting health and wellbeing could be incorporated further into the brief. This could, for example, emphasise the importance of walking and cycling to the site and access to the rights of way network. Evidence and expertise from Suffolk's public health team is available to assist Forest Heath District Council.

Minerals & Waste

Waste

The County Council promotes design approaches to waste minimisation (Waste Core Strategy Policy WDM17). Features could be incorporated in later stages that allow for effective sorting, recycling and composting. The waste team at the County Council are keen to promote such measures and is available to provide advice.

Minerals

The western edge of the site is within a Minerals Safeguarding Area set out by the Proposals Map accompanying Suffolk's 2008 Minerals Core Strategy. There is limited encroachment of the Minerals Conservation Area into the site and the wider area for development. Furthermore, the likely resource, as identified by the British Geological Survey, is lower purity underlying Grey Chalk rather than sand and gravel deposits, which is the primary focus of the consultation areas.

Sustainable Energy

The brief provides a detailed account of the potential for low and zero-carbon technologies and recognises a fabric-first approach. The potential commercialisation of a district heating scheme could be possible if both elements are considered together. By way of a similar example, the County Council commissioned a report which identified marginal commercial potential for district heating. This could be improved with greater loads from, for example, a swimming pool. An application for the scheme (Chilton Woods) has been submitted and the report is available through Babergh's website.

Summary

The Mildenhall Hub is an important project for the County Council, which remains committed to its delivery. There are some positive elements in the Brief, particularly the recognition of the relationship between the Hub and the adjustment land that could be developed for new homes. Further information will help shape the Brief and the County Council will support Forest Health to collect further evidence and form the most appropriate strategic response.

I trust that this sets out the County Council's position on a range of factors to be considered in the Brief as well as its continued support for the proposal.