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Your ref:
Our ref: EPGR
8 May 2018

Dear Sir

Land north of Waldingfield Road, Sudbury: Chilton Parish Council
Outline planning application for a residential development of up to 130 dwellings (Use Class C3)
including means of access into the site (not internal roads), parking and associated works, with all
other matters (relating to appearance, landscaping, scale and layout) reserved
Application Ref No DC/17/04052

We act for Chilton Parish Council.

The Council is requested to pay careful attention to the contents of this letter when reporting the application to the Planning Committee at its meeting on Wednesday 9 May 2018; and to ensure that the points raised are clearly and expressly drawn to the attention of Members.

We summarise our client's position as follows:

1. A series of clear breaches of Policy CS4

The Chilton Woods Strategic Land Allocation – now embodied in Policy CS4 (attached for ease of reference) – has been a guiding principle of development for a decade and more. Babergh District Council has sought to engage with Local Parish Councils affected, and other local interest groups in weaving together the policy framework which has been evolved with great care over time. This is now embodied in the current adopted plan as Policy CS4 of the core strategy. The Policy says in terms that:

The Council is committed to working co-operatively with partners and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Councils and the local community to bring forward and deliver the Chilton Woods scheme in a timely way. This will include joint action to overcome any potential key development issues...It will also work jointly to ensure timely delivery of satisfactory access arrangements, sustainable transport provision, the community woodland, necessary community facilities and structural landscaping / woodland screening at the appropriate point in the overall development process.

Thus it is a clear policy imperative that the development of the identified Allocation is that it will hold to be unacceptable a piecemeal approach to development, unless piecemeal development conforms

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to an approved / adopted master and phasing plan, and does not prejudice the delivery of necessary infrastructure.

The Parish Council and the neighbourhood generally has also proceeded on the safe assumption and legitimate expectation that Policy CS4 will insist that:

The residential element [of approximately 1,050 new homes] is required to have direct access to the A134. Access will be provided from a new distributor road designed to link the A134 with Aubrey Drive

and that:

provision of community woodland and structural landscaping (approximately 30 hectares) located throughout the site and along the boundaries of the site [will be provided as part of the development and included in the Masterplan]

Policy CS4 goes on to provide, in relation to woodland and landscaping that:

This must be designated to take account of existing features such as trees, hedgerows and water courses, and to co-ordinate with the spatial requirements, design and context for the [detailed points endorsed in the Policy then listed]

It has been reassuring for the Parish Council that Policy CS4 also embedded the following commitment:

[any scheme of development] must provide for long-term, comprehensive financial and management / maintenance plans and arrangements for such community woodland, and for the local community and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Councils to be involved in its design, establishment and management

In determining this pure outline planning application for the Orchard site north of Waldingfield Road, the Council is in the spotlight in terms of whether it will genuinely live up to these clearly articulated policy pronouncements – which have been extensively consulted upon, and on which the Parish Council and others place great weight and reliance.

It is crystal clear from the application documents that:

- Application Ref No DC/17/04052 is piecemeal;
- The sole road access proposed is direct on to Waldingfield Road, and not via Aubrey Drive;
- There is no community woodland provision;
- Although it is said in the Officers' Report that:

A thick belt of strategic landscaping would bound the south-eastern edge of the Site where it runs parallel to Waldingfield Road to act as a natural barrier

the application does not demonstrate any commitment – nor does the brief schedule of proposed conditions and s106 planning obligations – that any "thick belt of strategic landscaping" would form an essential part of the development along the Waldingfield Road boundary.

We have advised our client that there are significant flaws in the Heritage assessment in the officer's report – a subject which should cause concern to the Council, over the question whether it has carried out a sufficiently careful systematic and compliant analysis of the harm which would be caused to the historic environment.

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The Parish Council's clear view is therefore that the only correct approach of the Planning Committee is either to adjourn this application, and cause some searching questions to be asked as to the approach taken, or to proceed to refuse permission.

The Conclusion in the Officers' Report in respect of compliance with Policy CS4 is of interest – and would appear to support the concerns expressed above. It says this (in part):

*The development proposed in relation to this application [DC/17/04052] **does not conform** [to Policy CS4]; as such, with the Masterplan now already approved by the Council pursuant to that Policy [i.e. the Chilton Woods development approved following the Resolution dated 25 October 2017 – Application Ref No B/15/01718/OUT]. It poses as a piecemeal approach to development which was originally expressly advised against under CS4. Further, and in the event that Members disagree with the above, the quantum of development proposed would nevertheless exceed what might be considered a reasonable approximation of "1,050 dwellings" in relation to limb "d" of the lead policy. Adopting a cautious stance, the development proposed is therefore considered to conflict, in those limited terms identified, with Policy CS4.*

[Text omitted]

*On that basis and taking into account the broader circumstances of the application, **consideration should be given, at least, to the question of whether the proposal is nevertheless acceptable**, notwithstanding the limited conflict with Policy CS4, and whether it should not be automatically refused, merely because it poses tension with that specific policy [emphasis added].*

This is all expressed in very telling language. It is a plain admission that the application is a direct breach, wholly in conflict, with adopted policy. It admits that the scheme is piecemeal.

The Report attempts to justify this stand-alone scheme on the basis that "the permission and subsequent delivery of the development [of the Orchard site] would not prejudice or adversely interfere with the [Suffolk County Council] permission".

This is a wholly flawed analysis. Members of the Planning Committee are being asked to vote in favour of a non-policy-compliant scheme which clearly breaches a decade of public engagement and consultation, and to allow a scheme which would if permitted be able to proceed entirely separately and stand-alone from the Chilton Woods Masterplan.

2. The fundamental errors in the Heritage Assessment

The NPPF has been established with the deliberate intention, overall, that a consistent and careful, systematic approach will be applied across the entire country, in making judgements about issues of relevance on a countrywide basis. In light of the NPPF, it is always prudent to avoid making hasty assessments of how policy should be taken in the stride of Planning Officers when arriving at recommendations on planning applications, particularly where there are nuanced issues – including in relation to matters of heritage protection.

The Parish Council feels that it should draw to the District Council's attention a number of concerns over the way in which the heritage analysis has been placed before Members on the basis of the application Report which is before the Committee this week.

Whilst the report chooses to refer to the Applicant's heritage advisor report it does not even mention two other detailed reports dealing with heritage issues provided by Mr Michael Collins an experienced heritage adviser. Further the extract from Heritage England quoted in the report is partial Heritage England's recommendation to your Council is:-

"Recommendation

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Historic England objects to the application on heritage grounds. The primary concern is the impact of the new proposed southern site access on Chilton Hall, which is a Grade II* listed house situated within a designed landscape which is registered at Grade II. This would result in harm to the significance of the designated assets. We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 123, 134 and 137. We would want to see an alternative site access and would want the applicant to include additional landscape mitigation on the southern boundary of the site.

In determining this application you should also bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess".

Officers arrive at the question of "public benefit" rather hastily, before having assessed the substantial harm issue to any sufficient extent. On behalf of the Parish Council we draw your attention to the need for rather more care to be taken over this issue than is evident from the Officers' Report, lest the matter be open to adverse comment, criticism or (worse) legal challenge.

This is another reason why the application should be adjourned, or in the alternative refused.

3. If, contrary to the Parish Council's position, the Officers' recommendation is accepted

If the Planning Committee is minded to resolve to grant permission for this Orchard site scheme, the Parish Council wishes to place the following points on the record:

a) Overall context – the need for transparency

The Parish Council is expressly referred to in Policy CS4. We are a long-term participant in this evolving planning world. The Parish Council requests that it be given a seat at the table to take an active role in the translation of any permission from a vote at Committee to the building of properties on the site.

b) The statutory Duty to Co-operate

It is a matter of very considerable regret that our client's on-the-record requests, along with those of other interested parties, that they be actively involved in progressing the Chilton Woods Resolution to Grant through to the planning permission which was in fact issued late on the evening of the Easter weekend (on Maundy Thursday) that the Parish Council's involvement was not permitted. Despite assurances of their involvement the Parish Council were ignored.

The Parish Council will be writing over the next few days to the Council to explain why we wish to formally request a Deed of Variation to the terms of the s106 Deed of Planning Obligations signed for the Chilton Woods development on 29 March 2018, when the planning permission was granted.

The inexcusable failure to take account of the Parish Council's views has caused significant and measurable harm to the interests of the Parish Council and the neighbourhood, which harm was entirely avoidable. This is highly regrettable, and could well have long-term consequences.

It is particularly regrettable that assurances given to the Parish Council were disregarded. The Parish Council are considering what other steps in the context of local government governance they should take to highlight their concerns in this respect.

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Our client requests that this egregious error is not repeated in the progression of any Resolution to Grant on the current application; and seeks your express confirmation that their views will be fully taken into account.

c) Necessary Planning Conditions

In the event it is resolved the Parish Council considers that there are a number of detailed conditions which would be required for any planning permission. These focus in particular on the following:

- Waldingfield Road structural bund;
- Acoustic fencing;
- Planting of the structural bund: timing; and
- Planting of the structural bund: species types and detailed control as to condition and form.

Detailed draft conditions addressing each of these issues as would be required by the Parish Council are **attached** for your urgent consideration.

d) Necessary and proportionate planning obligations

The Parish Council also require inter alia the following provisions to be incorporated in a s106 Deed of Planning Obligations expressly involving terms to benefit the Parish Council:

- Transfer of the freehold of the structural bund containing the landscaping to the Parish Council;
- Payment for the in-perpetuity maintenance of the structural bund and landscaping by the Parish Council;
- Payment for the community woodland;
- Payment to the Parish Council in respect of Village Hall Construction;
- Payment to the Parish Council in respect of Village Hall in-perpetuity maintenance;
- Disapplying the standard exclusion of the Contracts (Rights of Third Parties) Act 1999, such that the Parish Council has a direct right of enforcement of the provisions in the Deed intended to be for its benefit;
- A reserved Matters Protocol

The Parish Council expects and asks for confirmation that the Babergh Planning Officers will actively engage with the Parish Council to discuss these topics.

4. Overall conclusion

The application is a plain and direct breach of the adopted policies applicable to Babergh District, and should be refused.

If the Council is of the view that the scheme can be modified by amendment of the application, the Parish Council will need to understand why – and the consideration of the application adjourned accordingly.

If, contrary to the clear views expressed in this letter and in the representations made to the Council on the application, the Planning Committee decides to proceed, there would be no excuse whatever for a repeat of the highly unsatisfactory position evidenced by the way in which the Chilton Woods planning obligations were negotiated behind closed doors following the Resolution to Grant

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permission on 25 October 2017. Furthermore, the Parish Council places on record the clear necessity for appropriate express conditions and planning obligations as set out above.

Please acknowledge receipt by email, and confirm that copies of this letter and enclosures will be placed before Members of the Planning Committee sufficiently in advance of the Committee Meeting to give them an opportunity to assimilate its contents in full.

Yours faithfully

A handwritten signature in black ink that reads "Town Legal LLP". The script is cursive and fluid.

Town Legal LLP

c.c. (by email only)

Philip Isbell (philip.isbell@baberghmidsuffolk.gov.uk)

Chilton Parish Council (chiltonpc@btinternet.com)

Mrs M Maybury (Margaret.maybury@babergh.gov.uk)

Mr F Lawrenson (frank@lawrenson.net)

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The logo for "tn." in a bold, lowercase, sans-serif font. The letters are black and the period is also black.

**Land north of Waldingfield Road, Sudbury: Planning Application Ref No
DC/17/04052**

Chilton Parish Council's objection letter: draft conditions

1. Waldingfield Road structural bund

No development involving the laying out or construction of internal roads or the commencement of construction of any of the residential dwellings, other than works to complete the approved site access point onto Waldingfield Road shall take place until a structural bund inside the property boundary running along the entire length of the site adjacent to Waldingfield Road (other than the junction of the internal road) has been constructed and completed in accordance with details of the bund have been submitted to and approved in writing by the local planning authority. The structural bund shall be to a height of not less than 2 metres measured from ground level along its entire length, and not less in width than 3 metres along its entire length (other than the junction of the internal road); and shall be constructed of materials including soil capable of supporting strategic planting for screening purposes. It together with the landscaping will extend to a width of 15 metres into the development site from Waldingfield Road. The structural bund shall be constructed and completed in accordance with the approved details prior to the commencement of construction of any of the residential dwellings, and shall be maintained permanently in situ.

Reason: To ensure that the development is appropriately screened to adequately protect the amenity of neighbouring properties and to ensure that the development does not cause unacceptable harm to heritage assets.

2. Strategic planting and acoustic fencing along the structural bund

No development other than works to complete the structural bund shall take place until a hard and soft landscaping scheme for the structural bund has been submitted to and approved in writing by the local planning authority. This will include the following details:

- (a) Details of acoustic fencing to be constructed along the entire length of the bund including its means of attachment.
- (b) Details of all trees and plants including (including species, size of stock at time of planting and location) to be provided along the entire length of the structural bund as well as areas for seeding. The new landscaping should comprise of native species only as defined in Schedules 2 and 3 of the Hedgerow Regulations 1997. The "soft landscaping scheme" shall be implemented in accordance with the approved details within the first planting season (October – March) following the commencement of development, unless otherwise agreed in writing by the local planning authority. If within a period of five years, any of the proposed trees and plants identified in the approved landscaping scheme die, are removed or in the opinion of the local planning authority become seriously damaged or diseased then they shall be replaced in the next planting season with others of a similar size and species.

Reason: In the interests of visual and environmental amenity, to ensure a comprehensive approach to landscaping, and to minimise the harm to heritage assets.

3. Landscape Management Plan

No development other than works to complete the approved site access to Waldingfield Road shall take place until a Landscape Management Plan has been submitted to and approved in writing by the local planning authority. The Landscape Management Plan shall include details for the ongoing management of the trees and plants including details of the extent, timing and frequency of grass cutting, shrub pruning and tree and hedgerow maintenance.

Reason: In the interests of visual and environmental amenity and to ensure a comprehensive approach to landscaping and the mitigation of harm to heritage assets.

4. Control over lighting

Any lighting of internal site roads and areas other than individual residential properties shall be undertaken in accordance with a detailed scheme to be submitted to and approved in writing by the local planning authority prior to the commencement of installation. Such scheme shall ensure that the positions, direction of lighting and lux levels are designed to minimise light spill caused by the development and shall be maintained in the approved form in perpetuity.

Reason: To minimise impacts upon designated heritage assets and light spill and other intrusion caused by the development on neighbouring properties.

5. Future closure of the access road junction to Waldingfield Road

Upon the opening to traffic of Aubrey Drive serving the Chilton Woods development approved under Planning Permission Ref No B/15/01718 dated 29 March 2018 connected to the boundary of the development, the access road to the development served by a junction onto Waldingfield Road shall be permanently closed and stopped up and the area closed off and the structural bund extended in uniform height and width to form a continuous bund along the southern boundary of the development. The additional bund shall be planted, fenced and maintained as specified in Conditions 1, 2 and 3 above.

Reason: To ensure that the development is served off Aubrey Drive as required by adopted Core Strategy CS4.

6. No vehicular connection to be made between the development and Chilton Woods until the junction with Waldingfield Road has been closed off under Condition 5

No internal site road forming part of the development shall serve more than 130 residential properties whilst the junction of the internal site road with Waldingfield Road is kept open to traffic.

Reason: To prevent the development from creating a link to the Chilton Woods development from Waldingfield Road. A level of traffic associated with more than 130 properties would create unsafe and unacceptable highway conditions on the traffic network.

Note: As indicated in the attached letter, the Parish Council also require provisions in a s106 Deed of Planning Obligations covering:

- Transfer of the freehold of the structural bund to the Parish Council following completion of its construction and planting

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- payment by the developer of a sum sufficient to cover the in-perpetuity maintenance of the structural bund by the Parish Council, on completion of the transfer for a nominal consideration - £100,000
- Payment to the Parish Council in respect of Village Hall construction (the figure proposed is £1.3 million)
- Payment to the Parish Council in respect of the Village Hall in-perpetuity maintenance (the figure proposed is £400,000). The sum provided in the other S106 agreement is clearly inadequate.
- Disapplying the standard exclusion of the Contracts (Rights of Third Parties) Act 1999, to ensure that the Parish Council has a direct right of enforcement of the provisions in the Deed intended to be for its benefit

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Policy CS4

Policy CS4: Chilton Woods Strategic Land Allocation and Strategy for Sudbury / Great Cornard

A. Chilton Woods Strategic Land Allocation

A comprehensive, mixed land-use development is allocated on 131 hectares of land in the Chilton and Woodhall area north of Sudbury as shown on Map A. A Masterplan will be required to guide development, together with development feasibility / viability evidence and a proposed phasing programme (to include as a minimum the items listed i to vii below). This allocation is expected to provide an integrated, high-quality and sustainable development that fulfils the requirements of other policies in this Local Plan, particularly Policies CS1 and CS15, and reflects the aspirations of Suffolk's Greenest County initiative. The planning application(s) must be accompanied by an Environmental Impact

Assessment.

A piecemeal approach to development within the allocated area will not be acceptable unless such development conforms to an approved / adopted master and phasing plan and does not prejudice the delivery of necessary infrastructure.

The development will provide and include and the Masterplan will show:

- a. Approximately 15 hectares of new employment land on the western part of the development (north of Woodhall Business Park) for employment related uses. Access to this development will be via a new distributor road linked to the A134 west of the existing Tesco superstore. An initial phase of employment development may make use of an additional means of access via Woodhall Business Park as part of a comprehensive and agreed access strategy and phasing plan;
 - b. Approximately 5 hectares of land to the north of Waldingfield Road are allocated for employment related use(s) (towards the scheme's eastern end) subject to the new development having a low impact only in terms of traffic generation and on nearby residential amenity. Some of this allocated development has already been implemented and is in situ. Access to this development will be via Waldingfield Road;
 - c. Provision for a waste facility, to include household waste and recycling centre;
 - d. Provision for approximately 1,050 new homes (on an allocated area of approximately 33 ha.). This residential element is required to have direct access to the A134. Access will be provided from a new distributor road designed to link the A134 with Aubrey Drive;
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- e. **Designed provision for effective functional separation between residential areas and employment land, particularly for those land uses / activities with greater impact on residential amenity (often non B1 type employment activities);**
- f. **Provision of community woodland and structural landscaping (approximately 30 hectares) located throughout the site and along the boundaries of the site. This must be designed to take account of existing features such as trees, hedgerows and watercourses, and to coordinate with the spatial requirements, design and context for the items referred to in point g and h below. The scheme must provide for long-term, comprehensive financial and management / maintenance plans and arrangements for such community woodland, and for the local community and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Councils to be involved in its design, establishment and management;**
- g. **Surface water attenuation will be required to minimise the risk of flooding (the preferred means being SUDS);**
- h. **Provision of landscaping, green infrastructure (which may incorporate 'blue' infrastructure such as balancing ponds/wetland created as part of the SUDS) and open space / leisure & recreational facilities (approximately 8ha); and also an area of allotments of between 0.5ha and 1ha, which is to be agreed with local parish councils. This provision is to be in addition to the community woodland and structural landscaping referred to above. Green infrastructure to be planned to coordinate with the wider network for Sudbury and Great Cornard area;**
- i. **A transport assessment based upon the development proposals will be required and a travel plan will be necessary;**
- j. **Provision of a well located and accessible community 'hub' / village / neighbourhood centre and land of an appropriate size to accommodate community infrastructure uses such as:**
 - i) **community facilities, services and uses such as a community hall/building with flexible space for community meetings, and/or sports and social club with changing rooms, and associated sports pitches (such as cricket and football), and/or multi-surface sports areas, and parking;**
 - ii) **local retail provision, and a pub and/or café, and leisure uses, business space and a residential element including opportunities for live/work units; and**
 - iii) **a civic square/area for market stalls/community meeting area.**
- k. **Provision for approximately 3ha. of land for education (primary school / nursery provision) and associated uses;**

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- l. An evidence-based package of sustainable transport measures to include the creation of new routes and/or the enhancement of existing links for pedestrians and cyclists to the town centre, rail station, employment areas, schools, bus stops, etc;**
- m. Any requirement for off-site transport / highway improvements will be determined by transport assessment evidence;
Core Strategy & Policies – February 2014 36**
- n. Any requirement for mitigation of healthcare impacts will be determined by evidence that proposals can be supported by existing infrastructure and/or a reasonable prospect of provision of funding to meet the needs arising from the development.**

The land uses specified above have been established through Masterplanning and Place-Shaping work. The approximate land areas are indicated as a guide for the preparation of a Masterplan as part of the planning application process. The land uses identified above comprise 94.5ha of the total 131ha of site area, and individual elements of the development will be considered in the context of the comprehensive development of the site, and on evidence available at the time.

The Masterplan and supporting studies and feasibility/viability evidence should demonstrate and include:

- i) how the overall development, including its access points, positively responds to, and where possible enhances, designated heritage assets and their settings;**
- ii) how the development will be designed to suit the landform / topography and landscape characteristics of the site and its local context, and protect the amenity of existing and future residents;**
- iii) design principles for each development parcel (residential, business / employment land, community / neighbourhood centre / hub) including addressing the sustainable development policies in this and subsequent local plan documents (if relevant), and how they will be implemented;**
- iv) outcomes from community engagement and mechanisms to establish delivery and ongoing management of community resources;**
- v) phasing of the development including provision of buildings, social and physical infrastructure and services;**
- vi) a biodiversity plan including any measures for protection, mitigation, compensation and/or new habitat creation; and**
- vii) the density and mix of housing types (including affordable housing provision) in line with Policies CS18 and CS19.**

Implementation and Delivery

The Council is committed to working co-operatively with partners and Chilton Parish Council, Sudbury Town Council, Long Melford and Acton Parish Councils and the local community to bring forward and deliver the Chilton Woods scheme in a timely way. This will include joint action to overcome any potential key development issues, such as the electrical power supply in the Sudbury area and its likely impact on development viability. It will also work jointly to ensure timely delivery of satisfactory access arrangements, sustainable transport provision, the community woodland, necessary community facilities and structural landscaping / woodland screening at the appropriate point in the overall development process.

Development at Chilton Woods is programmed for commencement in the earliest part of the Plan period. Progress on its planning and development will be closely monitored and the following phasing and timing reviewed to ensure delivery of an appropriate amount of new housing and employment land through the plan period:

- i) 2012 onwards - implementation of the Chilton Woods Mixed Use Development as shown on Map A in accordance with this Policy; Core Strategy & Policies – February 2014 37
- ii) 2016 - review of progress with delivery of Chilton Woods and target date set for release of land for employment and housing in the Broad Location of Growth identified on the Key Diagram;
- iii) mid – late part of plan period (or earlier if required following the 2016 review) - Masterplan submitted and approved and first phase of land released for development for employment land and approximately 500 dwellings in accordance with Policy CS5.

B. Other Development for Sudbury / Great Cornard

A Neighbourhood Plan and/or other DPD(s) will be prepared to provide a comprehensive framework to ensure that any planned growth and development for Sudbury / Great Cornard (other than that at Chilton Woods) is well integrated with the town and delivered at the right time.

Development in Sudbury / Great Cornard should comply with other policies in this Local Plan, particularly Policy CS15, and other subsequent documents, and where appropriate, provide:

- i) high quality design, structural landscape planting, and layouts and scale of development that respect adjacent landscape or townscape features, ensure a separate identity and avoid creeping coalescence with adjacent settlements;
- ii) a green infrastructure framework connecting with and adding or extending formal and informal green spaces, wildlife areas, and natural landscape settings and features;

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- iii) **good links and/or the enhancement of existing links for pedestrians and cyclists to the town centre, rail station, employment areas, schools, bus stops, etc.**

C. Sudbury Town Centre

As the district's principal town centre, the Council will encourage and support the continued growth, expansion and diversification of Sudbury town centre to serve its catchment area, particularly the provision of larger, more versatile retail and service units and improvements to public transport, strategic and local access.