

CHILTON PARISH COUNCIL

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For the Attention of Mr S Caslin

Sent by email: Samuel.caslin@taylorwimpey.com

9th November 2020

Dear Sirs

You have invited members of the working group to review the draft Design Code produced by Taylor Wimpey (TW). We set out below Chilton Parish Council's comments on the draft Design Code document following our meeting with Taylor Wimpey on 28th October 2020. Page and paragraph references below reflect the references used in the draft document.

Before we go on to comment on the draft document in detail, as the design code document (TWDC) will be a material consideration in any future planning application, as we have already informed you, we regard it as very important that the TWDC is not limited to dealing only with matters required under certain outline planning conditions, but is of a wider ambit to deal with other important aspects of the site. There is no reason why it should not do so.

Our main concerns about the TWDC are first in its present form it does not fulfil the requirements of nor comply with the National Design Guide published by the Government in October 2019, (NDG). In our opinion the TWDC takes little or no account of the requirements set out in the NDG, it does not instruct a designer or designers on what works should be carried out even in its limited form dealing with residential properties. Second, we consider the current ambit of the TWDC too narrow. In our opinion it needs to deal with a number of other important issues relating to the development which currently are omitted namely the landscaping strategy, the construction methods to be employed, energy, lighting, biodiversity, SUDS and climate change. All these omitted matters fall within the ten key characteristics set out in NDG referred to below.

Given what we regard as the failings of the TWDC and the need to revise it we consider it appropriate to set out what is the definition of a design code and its purpose.

The ambit of a design code

TWDC states on the front cover that it is a site wide document so that statement conflicts with your contention that it is intended to deal only with residential properties, the village centre and market square. However, in our opinion unfortunately the TWDC fails to deal with a number of important aspects of the development. We have had earlier correspondence with you about our concerns. We understand from your recent correspondence with our Chair that TW maintain the scope of your

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design code is defined by Babergh District Council (BDC) at outline permission stage (OUP) and that TW are bound by those parameters. You assert that the omitted matters from the TWDC which Chilton Parish Council (CPC) have asked you to include can be dealt with instead by TW at the reserved matters application (RMA) stage of various phases.

This is a serious and fundamental difference of approach between us which is important to try to resolve so that a high-quality development can be achieved. We disagree with you about the status of a Design Code. TW appear to believe that you are constrained by condition eight from producing a site wide design code. We disagree. Condition eight does not constrain TW from dealing with the items that one would expect to find in a design code - it merely requires TW to deal as a minimum with residential properties, the village centre and market square in a design code. However over and above the OUP is the NPPF and other planning guidance to which TW should have regard. To proceed as TW suggest by providing detailed and relevant information only at a later stage by way of an RMA application means, conveniently for TW, that the RMA cannot be measured against the detail in the design code because on TW's scenario there will be no such detailed information. Whilst you say TW are not trying to shirk its responsibilities in providing a detailed site wide design code that is the clear impression that is created.

In our view it is clear that a site wide design code is required.

In support of our case that the draft TWDC fails to fulfill the requirements of a design code even on the residential properties element we have consulted experienced planning experts who agree with us.

The Department for Communities and Local Government and the Commission for the Built Environment (CABE) produced a Practice Manual for Design Codes which states: –

"Design codes are a distinct form of detail design guidance comprising a set of written and graphic rules that establish with precision the second and third dimensional design element of the particular development or area and how these relate to each other."

"A design code's aim is to provide clarity over what constitutes acceptable design quality for a particular site or area and thereby provide a level of certainty for developers and the local community like."

It may assist other members of the working group to have sight of another Design Code which contains examples of what we consider is missing or lacking in the TWDC. We attach a link to the West Corby draft design code. <http://www.westcorby.com/media/1086138/West-Corby-Site-Wide-Design-Code-min.pdf> Our purpose in referring to this draft dated September 2019 which we point out was issued before the NDG was published is to show the level of detail which is expected in a design code. That development although larger with more residential units is similar to this site in that it contains a range of employment, education, leisure, retail and social use within what is intended to be a comprehensive green structure. This actual example gives both the reader information about what sort of place the development will be and informs a designer of how the development should be delivered. Regrettably we consider the TWDC as currently drafted fails on both counts.

Further since the OUP was granted, the Government introduced in October 2019 the National Design Guide, which we note is not referred to as one of the documents to which you have had regard - see page 4 TWDC. Also, the NPPF makes it clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. NDG

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illustrates how well-designed places that are “*beautiful enduring and successful*” can be achieved in planning. NDG forms part of the planning procedural guidance and illustrates the Government’s priorities for well designed areas.

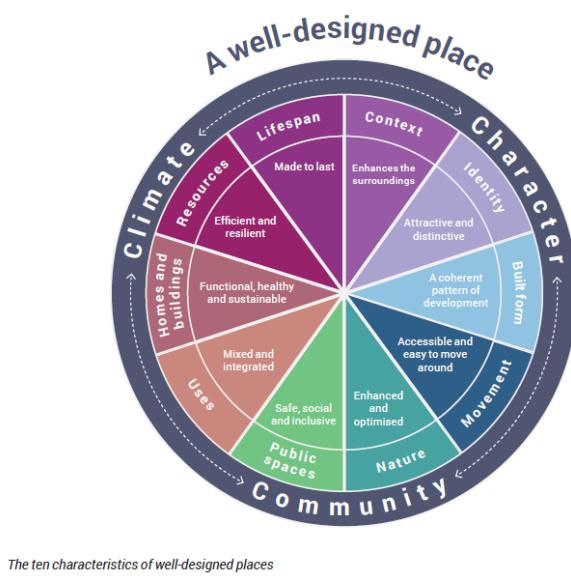
The NDG covers issues that are important for design codes where these are applied to large scale development which this is. There are ten characteristics which should be included in a design code and which we refer to below which reflect the Government’s priorities and provide a common overarching framework.

Introducing the ten characteristics

³⁵ Well-designed places have individual characteristics which work together to create its physical **Character**. The ten characteristics help to nurture and sustain a sense of **Community**. They work to positively address environmental issues affecting **Climate**. They all contribute towards the cross-cutting themes for good design set out in the National Planning Policy Framework.

³⁶ The ten characteristics set out in Part 2 are:

- **Context** – enhances the surroundings.
- **Identity** – attractive and distinctive.
- **Built form** – a coherent pattern of development.
- **Movement** – accessible and easy to move around.
- **Nature** – enhanced and optimised.
- **Public spaces** – safe, social and inclusive.
- **Uses** – mixed and integrated.
- **Homes and buildings** – functional, healthy and sustainable.
- **Resources** – efficient and resilient.
- **Lifespan** – made to last.



The stated ‘Vision’ for this site is

“It will be a healthy environment to live and work in set within an extensive network of community woodland and green spaces...”

“The development will also embrace sustainable design in a wider sense by promoting multifunctional green infrastructure, which incorporates recreational routes, sustainable drainage and wildlife habitats.”

However, the TWDC does not deal with the treatment of the community woodland or landscaping throughout the site nor the green open spaces nor deal with the sustainable drainage nor biodiversity.

We fail to understand why TW if, as you say you are, committed to producing a well-designed development are so resistant to providing a proper detailed site wide design code. We understand you want flexibility but you are not entitled to free rein and the local community is entitled to certainty, specificity and to have measurable standards in a design code against which your future RMA applications can be judged as to whether they comply.

We should point out that NDG supports paragraph 130 of the NPPF which states that “*permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.*” If you refuse

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to provide a detailed site wide design code for this site, we consider that your applications for RMA should be refused.

Introduction

1.1 Well-designed new development is integrated into its wider surroundings, physically socially and visually. We regard the context is very important as it influences the approach to the whole development. We are surprised and disappointed that this section completely fails to recognise the site rural location and seeks to focus on the urban environment. The land is classed as ancient rolling farmland. The section as drafted only recognises the Sudbury area and fails to mention any of the four parishes in which the site is located namely Acton, Chilton, Great Waldingfield and Long Melford. In particular with regard to Chilton which is the Parish in which most of the land purchased by TW lies, the section fails to mention any of the Parish history of which there is a substantial amount, nor is there any recognition of its' heritage assets in particular the Grade I listed Saint Mary's Church.

The section fails to refer also to the fact that the site is located on an WW11 airfield nor is there any mention whatsoever of the airfield's history or context. Given these omissions it seems to us incongruous however to refer to the Tesco store.

We have not seen your study of local character but from the current description in this section we consider you focus too much on Sudbury and ignoring the rural surroundings and the history of how the site has evolved. Please provide us with a copy of your Study of Local Character. We consider the photograph used would benefit from having the respective parish boundaries shown on it.

We are happy to provide you with more information about Chilton Parish, the Church and the airfield should you wish. There is a book published about the Parish and its' history which we would refer you to. We are sure the other parishes would also be willing to provide such information.

We recommend therefore that this section be altered to reflect the above.

Page 2:

1.2 Outline Consent and Planning Context

We refer you to what we say above regarding the ambit of the design code rather than as you propose to limit it to deal only with Condition Eight of the outline planning consent.

Page 4. 1.2

We believe you should consider and pay special regard to other design guidance not referred to by you, namely:

National Design Guide (October 2019)

Garden City principles (Town and Country Planning Association)

Spatial Planning for Health

Joint Babergh and Mid Suffolk District Council Landscape Guidance 2015 and

Babergh Joint Local Plan (Regulation 19).

1:3 Purpose and status of this document

You propose that TWDC provides a mechanism in order to help "create a user friendly, accessible single point of reference to guide the design and delivery of Chilton Woods promoting a greater certainty in the development control process".

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Although you want to avoid “*detailed design decisions*”, however, the local community is entitled equally to have specificity and measurable standards. Accordingly, we remain opposed to the TWDC only dealing with limited aspects when it could constitute a single point of reference for development across the whole of the site. Such a design code is envisaged in the Government NDG and its ten key characteristics.

Page 9: 2:1 Master Plan Context: the Vision for Chilton Woods

SCC vision stated: “*It will be a healthy environment to live and work in set within an extensive network of community woodland and green spaces*”

As TW has not purchased a substantial block of the community woodland please explain to us how this area of woodland will be integrated into the proposed scheme?

You go on to say “*the development will also embrace sustainable design in a wider sense by promoting multifunctional green infrastructure, which incorporates recreational routes, sustainable drainage and wildlife habitats*”.

“*The development will be of a standard that it will be used as a good practice example across the county for planning and delivering large developments*”.

BDC we understand currently has no design guidance standards. Accordingly, the importance of the TWDC to be used as a good practice example is heightened and that is why we say that it needs to be an all encompassing code not certain items being cherry picked for insertion into it. If TW is committed to delivering a good practice example what is TW’s reluctance to have a comprehensive design code applicable to this development? TW’s reluctance to commit to such causes us considerable concern.

Your suggestion that these other important aspects of the development can be dealt with at RMA stage is not acceptable to us. The RMA process is too late. There is no opportunity to have input into the design at that juncture. We consider there needs to be a certain standard and principles applicable to, e.g. all aspects of the landscaping, not certain areas being put forward to be developed in a certain way as opposed to another area. TW wants flexibility but the local community is entitled to have specificity and measurable standards for the RMA proposal to be considered against - that is our understanding of the purpose of the design codes not to give a developer an opportunity to deliver whatever it wants based on flexibility.

Page 10

2:2 you refer to “*certain development principles where established to shape the design process*”. Please clarify whether you are referring to the previous place making process in which this Parish participated as establishing these development principles or whether these development principles are drawn by you and you are stating that this process of “*working group*” has identified these principles?

Community and Homes section

The second bullet point refers to the provision of community woodland as does the second bullet point in the character and place making section: please clarify how all the Community Woodland shown in the parameter plans is to be provided for this proposed development?

Why is it only the northern edge of Sudbury which is to be enhanced?

CHILTON PARISH COUNCIL

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Accessibility and connectivity:

Chilton Woods should be seen in context with its surroundings not just Sudbury. Chilton Woods amenities must also be accessible to the local area (Chilton, Acton, Great Waldingfield, Long Melford and possibly further afield) and therefore should be capable of being accessible by foot and cycleways as well as by road.

Enhancement footpaths and cycle links: What new public rights of way are to be provided in this development? It should be clear that footpaths created should become public rights of way routes.

Climate and Sustainability

You state “*Designing homes and landscaping to provide natural cooling and shading*”. More detail about how this is to be fulfilled / created needs to be included in the TWDC.

The wording “*to consider the opportunity for on-site sources of low carbon heat, such as a district heating network*” is widely worded. We suggest rewording instead to say: “*To plan positively for onsite sources of low carbon heat and renewable such as a district heating network*”

We consider that the current wording of “*to respect the setting of wildlife habitats within the site including the Waldingfield County Wildlife Site*” is too weak and should be redrafted to read “*to preserve and enhance the setting of wildlife habitats...*”

Page 11 Design Principles

You state that scheme to better reflect the “open” character of the former WW11 airfield by avoiding development in this area. The use of the phrase a “*sympathetic green edge*” which is vague is not clear to us. Sympathetic to whom? Please explain what is intended? We interpret “*green edge*” to mean a narrow strip of grass or shrubs or trees whereas what is required is a long belt of community woodland. This scheme was never intended to be a large housing development with a few trees scattered along the edges. How is the missing area of community woodland in the north to be provided or is it TW’s intention that their scheme should go ahead without this area? Please explain.

Children’s Play Areas

In our view the children’s play area should be of a green nature using timber materials so as to fit with the environment especially in the village green/centre area i.e. more of a green gym rather than a “springy chicken” type of playground.

The Sports Pavilion is to include changing rooms and kitchen and is to be located where shown on the parameter plans. This was discussed at length during the place shaping sessions and agreed that it was not appropriate to have the sports pavilion facilities incorporated into the community centre/village hall building.

Consultation

We believe TW’s consultation process would be improved by having an independent facilitator running it rather as at present. In the present circumstances unfortunately consultation is being done by giving the consultees only a very limited time to consider a substantial volume of documents, which timetable is imposed by and for TW’s convenience. The place shaping group had an independent facilitator.

What is the proposed consultation strategy TW has devised - please tell us the detail? If it is to have a limited design code as this is, and then for TW to issue a series of separate RMA applications over the next 5 to 10 years or so of the build, we do not think that accords with the Statement of Community Involvement (SCI) and we consider that would be an unsatisfactory way to proceed .

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Detailed involvement needs to be at the present time on all aspects of the scheme – design codes not as TW propose certain aspects being considered only at an RMA stage when that would be too late.

3:2 Consultation and Engagement

Please see what we say above regarding the TWDC. If TW value local engagement as you say then please demonstrate this by widening its ambit.

Page 21 4:1 Land Use

In the second bullet point where you refer to range of community facilities “**such as**” (our emphasis), we propose “*such as*” be deleted from the sentence because it gives the misleading impression that these are possible suggested uses whereas each of them is a required provision.

There needs to be a reference to the village green also here as it is equally a land use. How will S106 obligations be discharged on land not owned by TW?

The employment land is not covered by the TWDC. If it is intended that this land has its own design code how will the design code be linked and made consistent?

Key items:

Second bullet point: delete the word “*generally*” before accord because the reserved matters will need to reflect the approved DAS. The use of the word “*generally*” gives too much scope for wriggle room and argument about whether or not the application only accords or only in part. Certainty is needed.

Page 22: 4:2: Massing

For the reader who is not versed in planning it would be useful to explain the term “*massing*”. Third bullet point: it should be made clear that there should be no development on the Village Green area.

Page 23: Key Item.

It is stated taller buildings should be used in key locations.

We consider “*should*” which is a directive should not be used and propose replacement by “*may*”. The key locations need to be agreed and identified in the TWDC. Please inform us where TW consider to be key locations.

Page 24:4.3: Density

We do not agree that such higher density of up to 41 homes around the village centre is appropriate or desirable. The village centre is supposed to have fewer homes in its’ immediate centre and such higher density as TW propose will in our view detract from the village centre area.

Key item

What are TW proposing that the density be consistent with?

Page 25:4.5 Building Typologies and Form

We appreciate the image is a placeholder image but we do not agree that the village green should be totally encircled by buildings.

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Babergh has an ageing population. There needs to be a variety of homes to meet the needs of older people. Whilst you deal with the external type of buildings you do not describe their proposed function. We ask you to consider this for certain areas such as independent living and age restricted general market housing. We also consider the TWDC needs to deal in more detail as to

- how your design and development will address different lifestyles, abilities and stages of life, including the ageing population which Suffolk has and
- how your design of housing is adaptable to meet the future needs of the residents.

Key item

With respect a considerable amount of planning jargon is used in this section, see namely “*key item: corners facing onto public open space should be articulated to provide local landmark features and aid site legibility*”. As you are intending to go out to public consultation on this document we propose that you revise the wording in this section to have less planning jargon and more plain English.

Page 26: 4:5

We understand typology to mean the classification of, usually physical, characteristics found in buildings according to their association with different categories but wonder whether a simpler description could be used. Given the many different types shown in the sketches we consider it would be helpful to have more detailed photographs of the type of building.

Housing mix: We consider the TWDC needs to set out the proposed housing mix through the phases rather than it being left unknown as is the present position. Suffolk has an ageing population and we believe that the provision of bungalows is therefore desirable.

Page 29: Street Hierarchy

We consider that all the roads and streets throughout the development should have a maximum speed of 20 mph and a lower speed nearer the school.

In the sections about housing and street hierarchy we comment generally that one is unable to establish what a particular street elevation in a particular area would look like. Instead of the several small sketches we believe annotated photographs of buildings showing the particular architectural features of interest would be more helpful and better illustrate the design – please see the West Corby design code for examples. Given that the graphic images form an equally important part of the design code it is important that they are of sufficient detail. There are a number of placeholder images which need to be replaced with either detailed plans or photographs but these should be consulted on before public consultation as the working group has not yet seen them.

In contrast the West Corby design code has illustrated examples of housing and street elevations in a particular area but there is no such similar information provided in the TWDC. Rather it currently appears in the TW scheme that any of the various types of buildings, subject to storey height, could be placed in the residential areas. There is also little information about the building envelope of the various housing designs.

We also consider certain streets could be designed to encourage community relations such as Marmalade Lane, Cambridge.

On pages 33/34 where you refer to character street types it would be helpful if you cross referred to how this complies/relates to the Manual for Streets.

CHILTON PARISH COUNCIL

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The figure on page 29 is confusing with black and open/closed blue arrows, red green and blue dashed lines that are not explained in the key.

Page 31: 4:7

You refer to “*the wider neighborhood and the rest of Sudbury*”. This site is not an urban extension of Sudbury but it is apparent that such is the approach that TW are adopting rather than regarding it as per the Vision as a separate “*woodland/garden village*”. With 1,150 residential units depending on the housing mix this development could easily have a population larger than Lavenham.

Page 36 : 4:8 Pedestrian Routes and Cycleways:

Rather than cyclists having to store cycles in garages or sheds at the rear of houses, to encourage the use of cycles we suggest that lockable cycle storage racks are provided on the street/verge so that there is easy and quick accessibility.

At the remote presentation of your infrastructure SUDS structural landscaping drawing on the fifth of November you showed a combined pedestrian pathway and cycleway being a total of 3m in width (1:5 each side) as agreed between yourselves and Suffolk Highways. No detail of the design of these combined cycleways and pathways, nor measurements is included in the draft TWDC save for a reference on page 32 para 4:7 to “*footway minimum 1:8 m on either side.*” We believe this proposed measurement of 3 m for the combined footpath\cycleway is too narrow and does not accord with current standards where 1.8 m / 2 metres is required for a pedestrian pathway as appears to be recognised by TW elsewhere, as stated above. Please would you confirm the position as to your proposed measurements for cycleways and footpaths.

We also consider that the cycleways would be better located throughout in a separate lane on the carriage way / roads leaving the pedestrian footpaths separate especially in green open spaces. Our understanding is this is what is recommended by the Manual for Streets. Our parish has experienced complaints from parishioners walking on footpaths about the wrongful use by cyclists of public footpaths and walkers being forced to step off the footpath to avoid being in a collision with cyclists. Also, what about the use of e bikes or e scooters - will they be allowed to use cycle paths or be restricted to carriageways?

Would it be possible to negotiate extensions to rights of ways outside the boundaries of the development which would allow foot and cycle traffic between the development and Acton/Great Waldingfield.

Page 40 4:12 SUDs strategy

This section does not explain what strategy is being adopted to deal with surface water run off on the site. There are a number of existing watercourses, ponds on the site which run off/ down to other watercourses, moats, ponds and other water features outside the site. A number of ponds off the site already support GCN populations and other species. These ponds also support foraging by bats. We are concerned that if you create a drainage system that removes all the surface water off the development site into your drainage systems and into the main sewers other watercourses, streams, moats and ponds off the site may consequentially be deprived of water which would have a substantial adverse effect on existing natural water features, and upon the habitats of protected species. We therefore would like to understand please your drainage strategy across the whole of the site.

The site is in an area of low rainfall and has a heavy clay soil. The TWDC needs also to deal with water conservation methods such as collecting rainwater, rather than letting it all run/drain away,

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rain gardens and grey water for reuse on site. Permeable materials should be used wherever possible such as in hardstanding and parking areas to allow water to permeate into the soil. Grasscrete could be used in driveways, pathways and other suitable areas so that a greener and less urban appearance is achieved.

This section also makes assertions about a variety of SUDS components which MAY (our emphasis) be used but fails to provide any specificity or measurable standards. Instead it is asserted that many of such features fall outside the area covered by the TWDC. We disagree. The National Design Guide deals with drainage and water management so we consider this TWDC should too. We consider that water features should form part of an integrated system of landscape, biodiversity and drainage. This would include new water features that manage drainage and also existing water courses together with green and brown roofs, swales, rain gardens, rainwater capture and other drainage. Water features can create multifunctional “green sustainable drainage systems”. They also enhance the attractiveness of open spaces and can provide opportunities for play and relaxation as well as for biodiversity.

We are aware that to satisfy conditions 38/39 of the OUP, a landscape and ecology plan was submitted by SCC (LEMP). We attach an extract below being figure 2.3 from the LEMP being the landscape and ecological masterplan showing a number of features on the site. For these reasons we consider that you should provide much more detail about landscape and ecological features upfront in the TWDC rather than leaving it to parishes and individuals to have to comment piecemeal in response to an RMA application under a short statutory time limit. A drawing including a SUDS basin was shown on 5 November to the working group as part of your infrastructure application. Why can't a detailed site wide drawing and description be produced to be integrated in the TWDC showing the location, design, features of the proposed drainage components including swales, ponds and wetlands and the landscape and other ecological features.

Figure 2.3 - Proposed Landscape and Ecology Masterplan



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The SUDS key items listed are only aspirational statements and unfortunately provide no practical statements of how, what, where and when TW are to achieve these aims. These key items are not acceptable to us as they are uncertain, lack specificity and lack measurable standards. Accordingly, we ask you to revise this section substantially and explain what features you intend to use and in what way to achieve what particular purpose.

Page 42 :4:14 : Sustainable Design and Construction

We consider this TWDC should explain and contain the detail of how this development achieves sustainability. We are against sustainability being left over until each individual RMA being supported by a '*summary*' unknown document called a sustainability statement. We point out that sustainability falls within the 10 key characteristics.

Also, this section is too vague. Your referring to some measures that "*COULD HELP*" (our emphasis) to ensure a sustainable community; without any commitment to use them is useless.

For example, the document refers to "*highly insulated homes*" but does not refer to any standard e.g. Passivhaus. Please explain to what standard of insulation you are referring to and what type of insulation would be used? Why not use heat retaining glass?

BDC in 2019 declared a climate change emergency and have a goal of being carbon neutral by 2030. In our opinion the design code needs to deal much more with the energy hierarchy, in particular:

- reducing the need for energy;
- energy efficiency;
- maximising the potential for energy supply from decentralised, low carbon and renewable energy sources such as photovoltaic arrays, ground source heat pumps and district heating systems to reduce demand for non-sustainable energy sources. Passive measures for light, temperature ventilation and heat can be used;
- then making efficient use of fossil fuels from clean technologies.

As gas boilers will be phased out during the build/life of this development we consider TW should not introduce them but use other methods from the outset. We deal with water conservation in the Suds section.

Are appliances such as washing machines and tumble driers to be provided by TW? If not, why mention this?

An adequate quantity of charging points needs to be included for electric vehicles. Sales of new petrol/diesel vehicles will be phased out during the life of the development.

There appears to be an opportunity to make provision for ultra-high speed broadband using technologies such as FTTP or GFAST.

"*Careful design of street lighting*" is asserted but no detail provided of any lighting whatsoever in this TWDC, which is a serious failing and should be remedied. We would like detailed information about lighting so as to consider both low energy usage and what steps are being taken to avoid and/or mitigate light pollution. Also there are provisions about lighting in the LEMP which need to be taken account of.

CHILTON PARISH COUNCIL

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Again, there needs to be clarity, certainty and measurable standards provided for as to sustainability and construction. A site waste management plan and a construction management plan needs to be produced now and integrated into the TWDC. The construction on this site will go on for years and as that will affect our residents and parishioners for those years the TWDC should set out the detailed provisions and steps to be taken to for example, mitigate noise and vibration levels on site e.g. use of electric vehicles on site, and acoustically muffled tools, use of acoustic fencing and/or blankets.

Other issues also need to be addressed - what piling system is to be used?

What steps will be taken to avoid soil erosion and to address dust created by construction works? In order to increase sustainability open space, ecological areas, grassland and wildflower meadows areas should be sealed off and protected from being built on or materials stored on them during the development process.

What route is intended for construction access? There is no mention in the TWDC but access through the airfield entrance has been mentioned during a working party meeting. Chilton Parish Council would not support such a proposal because the B1115 is a narrow twisty road and not suitable for HGVs. Also the route that we understand TW were proposing to use through part of the airfield forms part of the Waldingfield Airfield County Wildlife Site so to do that would adversely affect the wildlife site, is clearly not sustainable and we believe is contrary to the LEMP for that part of the site. Please see figure 2.3 above where we draw attention to the area shown on the masterplan in pale green and is described in the key as "*low lying dense scrub to prohibit access to CWS*". Under the LEMP it is accordingly recognised that the CWS needs protection in this area. Accordingly, it appears to us clearly contrary to the LEMP purposes to allow construction vehicles through this area.

Further, the "Key items" stated are not acceptable with regard to the lack of a clear statement of sustainability principles in the TWDC.

Page 47 : Section 5 Character Area Definition

Generally, in this section we consider descriptions need more certainty and specificity as to what buildings are to be built in what areas and the images used could be more detailed and clearer.

5:1: Key items: the words "*with the principles of*" and "*proposed*" should be deleted - this is because the development will need be consistent with the character areas not with its principles which are obviously vaguer and uncertain.

Page 48:5:2: Colourways and Materials

We propose rather than the use of photographs at present showing lighter and darker colour tones on buildings as paint colours can vary and are uncertain that the paint colours to be used should be referenced by the applicable paint numbers.

Pg 49 onwards: 5:3: Woodland Edge

It is stated "*Homes here enjoy a green and leafy aspect facing onto the community woodland. Walking/cycling routes should pass through the trees and play areas to create active routes..*"

As the substantial plot of land to the north of the site proposed to be used as community woodland has not been purchased by TW please explain what area of community woodland is being referred

CHILTON PARISH COUNCIL

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to in this section since as far as we are aware there is no such area so we consider this section creates a misleading impression.

The materials to be used could be clearly specified and illustrated rather than the present wording which uses phrases such as “*materials could include*” which is uncertain.

We do not think the first photograph of Arborfield Green Wokingham is helpful.

In the key characteristics listed on page 50 in the building typologies you refer to “*predominantly*” detached and semi-detached and houses. We consider “*predominantly*” should be deleted as use of that word means other forms of housing could be built here which is not intended. However, if that is TW intention to obtain “*flexibility*” then you should make that intention clear and for clarity set out what sort of housing will be included in the area rather than using uncertain wording.

It states balconies, dormer and bay windows will be used but there is no photograph of the type. Generally, throughout this TWDC there are limited photographs of doors or windows supposed to be used – contrast this with the West Corby design code

What is an “*animated gable*”?

Roof finishes:

Amongst other items you refer to solar panels but otherwise there is no reference to the use of solar panels generally in this TWDC for example in sustainability.

Materials to be used:

The types of bricks/ brickwork should be specified.

5:1: Landscape Character

You state “*heavily influenced by the position adjacent to the community woodland, county wildlife site and wider open-space areas.*”

Again, we are puzzled to the reference to community woodland and think this is misleading because as already stated we understand the substantial area of community woodland is not being included under your scheme. Please explain. This is why it would be helpful to have a comprehensive landscape strategy included in the TWDC.

Plant and tree species:

Throughout the sections on landscape character It would be helpful to have a table of the proposed sizes of trees and shrubs to be used, for the former by trunk diameter. Shrubs throughout should not be less than 3l pot size. It should be made clear where whips and / or trees are to be used. We consider that some extra-large stock sizes should be used to provide some significant tree specimens in focal points. You refer to focal points but they’re not identified in the TWDC - There needs to be a landscape strategy included with a plan showing the focal points with the planting.

We assume the species of tree and trees described in the TWDC cross refers to those required to be used in the LEMP. Please confirm?

Boundary treatment with open space: we consider low timber cleft fencing is preferable to metal railings in the open spaces areas.

Private drives: you refer to a specific product: Marshalls Tegula Pennant Green. If intended to be used could a photo, please be provided.

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The Primary School and Preschool

Whilst we appreciate that TW are not building / delivering a school but instead providing SCC with a serviced plot the TWDC needs to integrate the school location into it - at present there is no mention of the school.

Page 52–54: 5:4 : Village Centre

As you will be aware the Village Hall and/or community centre (for ease of reference referred to hereinafter as the community centre) is planned to be an important and focal part of the village centre. The community centre is very important to Chilton Parish Council as currently Chilton does not have its own community centre. There needs to be a much more detailed plan and landscape strategy produced for the Village Centre within this TWDC setting out where the various elements such as the Village Hall/Community centre, live work/units, the retail units and the pub are to be located and their interrelationship to the village green and market square.

In the outcome of the place shaping group and we believe as recorded in the DAS the Village Hall forms a focal point on the village green and is not intended to be marooned / surrounded on all sides by hard landscaping. The Village Green was planned as large open grassland area not fully encircled by buildings.

As mentioned above this development once fully occupied will have a population that will exceed some of the larger villages in the area. In our view that fact needs to be recognised and the village hall needs to provide the re-configurable and multifunctional space needed.

There is no mention in the TWDC of the proposed facilities within or the building envelope of the Village Hall/community centre which there should be. A number of meeting rooms are needed including one large one which can be easily partitioned to allow for changing needs. The building also needs a kitchen, toilets and a shower, seating areas where parishioners can sit down and relax and / or have some refreshments and a secure storage area for valuable equipment. We consider a good modern example can be found at Lavenham.

Chilton Parish Council is happy to work with TW in drawing up more detailed specifications for this area and certain of the buildings to be included in the TWDC.

Children play area: we have commented on the design above. It has been mentioned in working group meetings that TW would like to relocate and merge two of the children's playgrounds in the village centre. Could we please have a plan showing the Village Centre in more detail so that this can be considered.

We do not like the photo which is used three times in various guises on page 52 and 53. We suggest a photograph of Lavenham Village Hall would be preferable.

Principles: Again, the proposed key characteristics and components need further discussion with us as the Parish Council due to the importance of the village centre area. The lack of detailed information provided in the TWDC we regret contrasts poorly with that provided in the West Corby example and we hope after discussion more detail can be included.

Again “*predominantly multi use apartment blocks*” needs explanation. It was not intended to be high apartment blocks but lower live / work units.

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The pub needs to be located away from any residential areas to avoid late night noise / anti-social behaviour.

Trees

On the village green we would prefer one very large centrally spaced native oak (*Quercus Robur*).

The two photographs of shrubs and one of the yellow tree could we consider be replaced by more informative photographs.

There is also no information about how the Market Square area integrates into the design.

Page 55- 57 Residential Neighbourhoods

There is a serious lack of definitive information which there needs to be about what type of housing goes where in these residential areas.

Where you say that the southern parts of this character area should take influence from the vernacular building forms and architectural features and materials within Sudbury you should specify which ones you mean. There are some architectural features and some building forms in Sudbury which we consider not appropriate for this development.

You also state

“different densities, build heights, landscaping and materials will be used to define key gateways and junctions, which will be reflected through detailed designs and reserved matters application.” this is not acceptable. You accept that the TWDC has to deal with residential neighbourhood areas to satisfy condition eight of the OUP but yet again no detailed information is provided which is astonishing. TW appear to be trying to push off every requirement to produce detailed information to some uncertain date by *“detailed drawings and reserved matters.”* Those detailed drawings and plans are required as part of the design code now; not to be provided at some uncertain later date when not subject to public consultation and input. It is as if the designer of this section ran out of steam and / or ideas and could not be bothered to provide the detail. We again refer you to the West Corby design code by way of contrast.

Further in the Principles section you state under building typologies and form:

- *“Varied houses and apartments,*
- *balconies, dormer and bay windows,*
- varied”.*

Heights

1 - 3 storeys - predominantly 2 storeys.

All of the above Principles section is too vague and unspecified so it gives the reader no certainty about what these areas would look like which is part of the purpose of a design code. This is excessively flexible! TW should be providing detailed housing elevations and streetscape elevations showing how these areas would look and operate.

We do not agree that the photo of Cambourne should be included.

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5.6 Acton Lane:

We refer to what we've said in the paragraph above about residential neighbourhood. Again, the principles are too vague - in this section it provides any variation instead of specifying what housing is going where.

Page 64: 6:0 Delivery and Phasing

This section is blank and needs to be drafted to explain in full the areas which are intended to be built out over what period with specificity. It should also make clear what areas are intended to be dealt with by separate reserved matters.

See also our questions above about the delivery of community woodland and how other areas such as open green space and allotments will be delivered and the linkage with the employment land.

6.2 Management and Adoption:

Please provide us with the separate management plan referred to in this section. The Village Hall/community centre is intended to be provided for Chilton Parish and the Parish Council is willing to deal with it for future maintenance and management once built subject to agreement as to terms. The freehold interest in the land on which the community centre is to be built should be transferred to Chilton Parish Council. Could TW clarify whether they are intending to build the community centre or hand over a serviced plot similar to their intentions with regard to the school.

Affordable Housing: Chilton parish would like to discuss the provision of affordable housing and its nature with TW.

6:4 Code Review:

You state "*The design code is intended to guide developers, designers and local authority offices through the duration of the project.*" Accordingly, this is why we consider the TW code needs to be much more detailed.

Conclusion:

For the reasons specified above we consider that the TWDC as currently drafted needs substantive revision to deal with matters which are omitted and / or not dealt with and which we consider should be included to comply with the requirements of the NDG and NPPF and to provide more detail and thus certainty and specificity about other issues where requested before any public consultation takes place.

Should TW want to discuss our comments and concerns we are of course willing to meet to do so.

Yours faithfully

Theresa Devine
Clerk to Chilton Parish Council