



## **Babergh Local Plan Alteration No. 2**

### **Public Inquiry**

#### **Topic Paper: The Chilton Mixed Use Development**

**August 2004**

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#### **The Chilton Mixed Use Development**

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## **1. Introduction**

- 1.1 This Topic Paper provides the context for and sets out the reasoning behind Chapter 12 – The Chilton Mixed Use Development - of the Babergh Local Plan Alteration No. 2.
- 1.2 The Topic Paper deals with key issues raised in objections to the chapter, and the Council’s response to those issues. Separate proofs of evidence will be prepared for individual objections.

## **2. Key Objectives**

- 2.1 The key objectives of the Chilton Mixed Use Development are set out in para. 12.2 of the Plan as follows:
- To accommodate a major proportion of the Babergh District’s housing and employment growth needs during the Local Plan period, in line with Government guidance and strategic planning policy;
  - To create an integrated, high quality and sustainable mixed-use development that maximises the physical, economic and social benefits for Sudbury and Great Cornard.

## **3. Wider Policy Context**

### **National Planning Policy**

- 3.1 Government objectives in relation to maintaining an adequate and continuous supply of housing and promoting more sustainable patterns of development are set out in PPG3 – Housing (March 2000). In particular, paragraph 21 states: “The government is committed to promoting more sustainable patterns of development, by:
- concentrating most additional housing development within urban areas;
  - making more efficient use of land by maximising the re-use of previously-developed land and the conversion and re-use of existing buildings;

- assessing the capacity of urban areas to accommodate more housing;
- adopting a sequential approach to the allocation of land for housing development;
- managing the release of housing land; and
- reviewing existing allocations of housing land in plans, and planning permissions when they come up for renewal.”

3.2 Para. 30 of PPG3 advises that in identifying sites to be allocated for housing in local plans, local planning authorities should follow a search sequence, starting with the re-use of previously-developed land and buildings within urban areas identified by the housing capacity study, then urban extension, and finally new development around nodes in good public transport corridors.

3.3 PPG3 asks that in order to promote more sustainable residential environments local planning authorities should promote:

- development that is linked to public transport;
- mixed use development;
- a greener residential environment;
- greater emphasis on quality and designing places for people; and
- the most efficient use of land.

- 3.4 PPG3 requires local planning authorities to build in ways which "exploit and deliver accessibility by public transport to jobs, education and health facilities, shopping, leisure and local services". PPG3 also requires local authorities to "seek to reduce car dependence by facilitating more walking and cycling, by improving linkages by public transport between housing, jobs, local services and local amenity, and by planning for mixed use".
- 3.5 Government policy on employment is set out principally in PPG4 – Industrial, commercial development and small firms. A key feature of this guidance is the need to ensure there is sufficient land available which is readily capable of development and well served by infrastructure, and ensure that there is a variety of sites available to meet differing needs.
- 3.6 PPS7 - Sustainable Development in Rural Areas (August 2004) sets out guidance in relation to urban fringe development: 'local planning authorities should ensure that planning policies in LDDs address the particular land use issues and opportunities to be found in the countryside around all urban areas, recognising its importance to those who live or work there, and also in providing the nearest and most accessible countryside to urban residents. Planning authorities should aim to secure environmental improvements and maximise a range of beneficial uses of this land, whilst reducing potential conflicts between neighbouring land uses. This should include improvement of public access (e.g. through support for country parks and community forests) and facilitating the provision of appropriate sport and recreation facilities'.
- 3.7 PPG13 – Transport (March 2001) sets out locational criteria in relation to new housing. The preference is to locate new housing in existing large urban areas, accessible to facilities and a range of transport provision. It also refers to the role of mixed use developments which can provide opportunities for people to walk and cycle between the uses they need to access.

### **Regional Planning Guidance for East Anglia – RPG6 (November 2000)**

- 3.8 Policy 2 of RPG6 states that "Major new development and other investment in infrastructure and services should be located so as to minimise use of undeveloped land and enable the inhabitants of individual settlements to meet their needs locally wherever possible, thereby contributing to sustainability. Drawing on capacity studies, the following sequential approach should be adopted to meeting development needs:

- i. the effective use of existing buildings and infrastructure, including a reduction in the number of empty buildings and encouragement for the conversion of larger houses to smaller units where appropriate;
- ii. sites within built-up areas, particularly those on previously developed land and avoiding areas of important open space;
- iii. development on previously developed sites on the edge of or close to urban areas; and
- iv. development on previously undeveloped sites.

3.9 Policy 6 of RPG6 states that development plans should include policies to support sustained economic growth and ensure the provision of a range of suitable sites for industrial and commercial development which takes into account the needs of existing and future businesses.

### **Suffolk Structure Plan 2001**

3.10 The Structure Plan sets out the strategic planning policies which cover the provision of housing and employment development in Suffolk up to 2016. The Plan emphasises the role of towns and seeks to concentrate most housing development in or adjoining towns, at a scale consistent with the principles of sustainable development. Policies CS3, CS7 and CS8 are of particular relevance.

3.11 Policy CS3 makes provision for significant housing development at Sudbury and advises that larger developments should incorporate a range of non-residential uses including community facilities, employment and appropriate transport infrastructure.

3.12 Policy CS7 establishes a sequential approach to the identification of new housing allocations to meet housing needs. In summary the approach is:

- a) Initially sites comprising previously-developed land or vacant or under-used land should be identified within built-up areas.
- b) Following an appropriate identification of sites under clause (a), further land may be required to meet the provisions of Policy CS8 (see para. 3.10). Under these circumstances, previously undeveloped sites should be identified immediately adjoining a built-up area, where development would not materially conflict with policies for transport or protection of the environment.

3.13 Policy CS8 sets out the distribution of housing development between Districts for the period 1996 to 2016. For the Babergh District the requirement is for 6,900 homes between 1996 and 2016, which equates to an average annual build rate of 345 new dwellings throughout the plan period.

3.14 Policy ECON3 provides for most new employment development, including major development, to be located in or adjoining towns on areas allocated in local plans.

#### **4. Relevant Studies**

##### **Babergh Urban Capacity Study**

4.1. In accordance with the guidance set out in PPG3 for assessing the capacity of urban areas to accommodate more housing the Council appointed Chestertons to undertake an Urban Capacity Study in June 2002. The final report was used to inform the Second Deposit Draft of Alteration No 2. The key conclusions of the study were:

- there are very few sites over 0.3ha which have potential capacity, and therefore the Council will be able to justify bringing forward greenfield sites in some settlements in parallel with the sites identified on previously developed land
- the majority of capacity (51%) from both identified and windfall sites over the plan period will be located in Sudbury and Great Cornard

- emphasises the importance of seeking to implement a density of 40 dwellings per hectare, wherever possible, as an average for new residential development, in order to maximise the use of previously developed land
- based on an average density of 40 dwellings per hectare, which was believed to be an achievable density applying the policies of the first deposit draft of Alteration No 2, the total capacity including rural windfall allowance was found to be 1,142 dwellings until 2016
- this represents a shortfall of 1,650 dwellings on the housing requirements of the Structure Plan, which demonstrated that the greenfield allocations proposed in the First Deposit Draft of Alteration No 2 would be required if the Structure Plan's housing target is to be met
- based on the findings of the Urban Capacity Study, "it is certainly the case that the proposed mixed use allocation at Chilton can be justified."

### **Babergh Employment Land Study**

4.2 The Council also commissioned Chestertons to undertake a study of employment land in the Babergh District. The study examined the current situation with regard to the supply and demand of employment land in Babergh and the employment land allocations in the First Deposit Draft of Alteration No. 2. The final report was published in November 2002 and was used to inform the Second Deposit Draft version of Alteration No 2. The key conclusions of the study were:

- Babergh has a shortage of employment land, which has pushed up land prices. There is also a shortage of commercially attractive buildings for occupation and the provision of good quality offices remains limited at present.
- There is an undersupply of industrial and office premises to meet the needs of existing and potential future occupiers.

- The level of employment land allocations in the First Deposit Draft is too low and there is a need to have at least some allocation in each of the three main employment locations of Sudbury, Hadleigh and the Ipswich Fringe.
- Over 90% of the future allocation of employment land in Sudbury (and around 58% of the District total) is entirely dependent on the Chilton Mixed Use Development Package.

## 5. **Evolution of the Chilton development in the Babergh Local Plan Alteration No 2**

### **Issues Report**

- 5.1 An Issues Report was published for consultation in January 1999. At the time of publication it was unclear how many extra houses would be needed in the District over the lifetime of Alteration No 2. Three potential housing growth scenarios were considered, and a strategy of reasonable, steady growth with provision of around 1,200 additional homes up to 2011 was put forward as the most appropriate proposition. As the largest urban area in the District, Sudbury was identified as offering the best potential to plan for growth in a sustainable fashion.
- 5.2 The report also recognised an acute shortage of employment land in Sudbury, where little undeveloped allocated land is available for expanding local businesses or for new employers. The annual average rate of employment land development in the Sudbury area suggested that for a ten-year plan period a further 8 hectares would be required. However, it was felt that provision on this scale would severely restrict flexibility. It was considered prudent to allocate double the level of provision implied by past take-up trends, in order to allow flexibility in site selection and provide comfort in catering for indigenous local growth and unpredictable inward investment.
- 5.3 Initial research indicated that there was little genuine and obvious ‘brownfield’ potential in the town. Constraints and opportunities for development at various sites on the periphery of the town were therefore explored. Landscape factors, floodplain issues, biodiversity and the existing settlement pattern were considered, as well as relationships with the town centre, schools, main employment sites and road network.

- 5.4 Developing to the east of Great Cornard/south of the A134 was considered and rejected because of high landscape impact on the undeveloped valley side, problematic access onto the A134 and distance to middle and upper schools. The area to the west of Sudbury consists of water meadows of high environmental quality, with high biodiversity value and is liable to flooding. For these reasons this area was not considered appropriate for development on the scale required. To the north it was considered that there is an important gap between Sudbury and Long Melford which should be retained to prevent the coalescence of the two settlements. To the south of Great Cornard lies prominent rising ground classified as Special Landscape Area. New development to the south of Great Cornard was provided for under the Local Plan Alteration No1 (which now has planning permission, but which is not yet built) which will include a landscape and open space buffer to provide a definite edge to development in this direction.
- 5.5 Being largely free of significant constraints to development, the area between Woodhall and the Waldingfield Road, Chilton, was considered to have clear advantages over other peripheral areas. The area is of modest landscape quality and comprises large fields with generally poor hedgerow features. It is of good agricultural land quality, Grade 3a, but avoids Grade 2 land north of Newman's Green and Mill Lane and towards Long Melford. It contains no areas of significant wildlife sensitivity and is not liable to flooding. The valley side has already been breached by development in the past, and the landscape provides an opportunity to locate most of the new development between existing development north and east of Springlands Way and the slight ridge of land south of Mills Lane and Newmans Green. This minimises the impact of development in long distance views. The area also has the advantage of being within walking and cycling distance of the Chilton Industrial Estate and Woodhall Business Park, and is close to middle and upper schools, the proposed new hospital and existing out of town superstore. PPG3 identifies walking as the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2 kilometres. A large part of the development would be within 2 km of the town centre and well within the 5 km distance identified as having potential for cycling to substitute for short car trips.

- 5.6 The report recommended that an integrated package of development, with a mixture of residential, employment, recreation, education and community areas, would not just serve the development but provide benefits for the existing town in a way that piecemeal development would be unable to do. It was considered that a mixed-use development package would provide the best opportunity for providing new social housing, land for the future employment needs of the town, new recreational areas for sports clubs and public use, and new community facilities.

### **First Deposit Draft**

- 5.7 The First Deposit Draft was published in September 2001. This reflected national guidance, the Structure Plan and representations made in response to the Issues Report. At this stage the Plan was intended to provide policy guidance up to the year 2011 and the housing provision in the First Deposit Draft was therefore proportionate to the requirements of the Structure Plan. 78% of the Structure Plan requirement was estimated to be provided by existing commitments and windfall sites, with the remaining 22% (1,500 dwellings) required to be provided by Local Plan allocations. The District Council estimated that only 1,200 of these were required up to 2011, with the remaining 300 required for the period 2011 – 2016.
- 5.8 At this stage of the Plan an urban capacity study had not been carried out. However, in allocating sites for housing development, the Council endorsed the sequential approach set out in PPG3 and Structure Plan Policy CS6, giving preference to redevelopment of previously developed land and urban extensions over the release of greenfield sites. The total number of new dwellings for which land was allocated in the First Deposit Draft was 1,185, including development on brownfield sites (100 dwellings), edge-of-town sites (820 dwellings) and village sites (265 dwellings). The Chilton Mixed Use development package was allocated to provide 700 of these dwellings and therefore make a significant contribution to the Structure Plan housing requirement for the District over the Plan period.

5.9 Responses to the Issues Report had raised a number of concerns about development at Chilton. These included urban encroachment into the countryside; ability to contain/restrict further development; mixing of residential and employment traffic; using the south-west corner of the former Chilton airfield for employment purposes; and potential traffic congestion in Sudbury town centre and other major road concerns.

5.10 The First Deposit Draft responded to these issues as follows:

- The employment area on the edge of the airfield was excluded, cutting down on countryside encroachment. A new area was identified around existing employment buildings on Waldingfield Road.
- To reduce impact on the countryside, make a more definite division between of the development and the countryside and introduce biodiversity and recreation opportunities the structural landscaped edge was expanded and extended to form a community woodland.
- Changing the location of one of the employment areas provided the opportunity to segregate housing from lorry traffic by proposing to confine lorry access to the main industrial area to the use of the Tesco roundabout.

5.11 The overall development package contained in the First Deposit Draft of the Plan reflected the primary concerns raised in response to the Issues Report. 26.5 hectares of land were allocated for residential development, including 3 hectares of public open space and a significant area for strategic green corridors. This would provide a net developable area of 19 hectares for housing. Land was also allocated for employment use, community and retail facilities and for the potential expansion of the existing Tesco superstore. 27 hectares were allocated for a community woodland to define the northern edge of the Chilton development area and provide a valuable wildlife and informal recreation area. New strategic cycleways and footway routes were planned to link residential areas to each other and to employment areas, the community woodland, schools and other community facilities, as well as a link between Chilton and Sudbury town centre.

- 5.12 Concerns were raised about the possible effect of this scale of development on the highway infrastructure of Sudbury town centre and the amenity of residents living next to principal traffic routes. A range of off-site highway improvements and public transport investment were proposed in order to minimise the traffic effect. In addition Suffolk County Council had a proposal to build a Western Bypass for Sudbury. This had been a long-standing proposal and was in the County Council's five year Local Transport Plan 2001-2006 published in July 2000 as one of three major schemes with construction to commence before 2006. Because of concern about the possible implications of traffic growth in the town and prior to any detailed evaluation of the traffic impact of the Chilton development the Council made it a requirement that there should be a firm commitment to the Bypass (with planning permission and funding approval) prior to the development being permitted.

### **Second Deposit Draft**

- 5.13 The Second Deposit Draft version of the Plan was published in May 2003 and was informed by the findings of the Urban Capacity Study and the Employment Land Study, as well as a Retail Capacity Study of the district carried out by Colliers CRE in 2002.
- 5.14 At this stage the Plan period was extended to 2016. Although this had certain implications for other parts of the Plan, the fundamental principles of development at Chilton were unaffected.
- 5.15 Since publication of the First Deposit Draft version of the Plan, the County Council had employed consultants to work on the preparation of a Local Transport Action Plan for Sudbury and Great Cornard. Their work indicated clearly that there was not a link between the Chilton development and the provision of a Western Bypass for Sudbury. Traffic modelling demonstrated that the Chilton development would contribute only 11% to the Bypass traffic flows and that only 8% of traffic generated by Chilton would use the Bypass. The need for the Bypass cannot therefore be substantiated by the Chilton development. The Council accepted this and as a consequence in the Second Deposit Draft the link between the Chilton and the Bypass was dropped.

- 5.16 In light of this and consideration of objections received to the First Deposit Draft Plan and consultations with interested parties, the Council made some amendments to the Chilton Development proposals in the Second Deposit Draft Plan. A comprehensive package of highway management measures was introduced, including measures in Sudbury town centre and within the development, in addition to the key sustainable transport measures already proposed.
- 5.17 At this stage it was proposed that the existing Tesco superstore should be relocated to a neighbourhood centre at the heart of the Chilton development. The Second Deposit Draft Plan was therefore revised to provide for a new superstore site within the development, and the new distributor road was realigned around the edge of the existing Tesco site. It was considered that this would have positive benefits for the development as a whole and the existing Tesco site would provide a convenient and appropriate area for bulky goods retailing.
- 5.18 In response to representations received against the First Deposit Draft version of the Plan, the size of the community and retail facilities allocation was increased from 2.2 hectares to 4.7 hectares. This would enable the provision of a neighbourhood centre which would be well placed geographically to serve residents and create a focus for the development. Community facilities would provide an important resource for the new and existing community in this part of Sudbury. Local shopping facilities including the relocated Tesco store would serve the day-to-day needs of the resident population.
- 5.19 Following the Employment Land Study's suggestion that the allocation of employment land in the First Deposit Draft Plan was too low, the employment land allocation in the Chilton development package was increased from 11.6 hectares of undeveloped land to 19.8 hectares. This scale of employment land will provide for a variety of industrial uses and will ensure that land is available to meet demand. The increased allocation was achieved by reorganising the layout of the development and extending the employment allocation to the north of the distributor road.

5.20 Another significant change was the increased affordable housing requirement for the development, from 20-30% in the First Deposit Draft to 35% in the Second Deposit Draft. This change was made in light of the findings of the District Council's Housing Needs Survey 2000.

### **Pre-Inquiry Changes**

5.21 During 2004 the Chilton development had been the subject of further consultations. Suffolk County Council is the majority landowner within the development area. When the proposals were being brought forward by Babergh District Council the County Council decided to appoint a development partner through a tendering process. This resulted in the Ashwell Property Group being selected to help promote the development. The Council had indicated in CP01 that a Masterplan would be required for the development of the area. Discussions between the Council and Ashwells led to the preparation of a Masterplan framework for the development, which sought to provide a greater level of detail than that contained in the Plan and to overcome some of the main objections to the Chilton proposals contained in the Second Deposit Draft.

5.22 The outcome of the Masterplan preparation and consideration of outstanding objections to the Chilton package resulted in the Council proposing several pre-inquiry changes to the Chilton chapter of the Second Deposit Draft. The key changes were:

- i) Reversion to First Deposit Draft proposal to provide for the potential future expansion of the Tesco superstore. This change was proposed in response to representations received from Tesco indicating that they do not wish to move from their existing store. Consequently the proposal to relocate the superstore to a new site central to the development would be unrealistic and unimplementable. Associated with these changes is the provision of a new site for bulky goods retailing. This change is necessitated by the loss of the previous site which is now proposed to provide for the potential expansion of Tesco. In response to concerns over the potential impact of the store expansion on Sudbury town centre, the new policy wording also requires evidence that there is a need for such a development and there will be no material adverse impact on the vitality and viability of Sudbury town centre or on the establishment of the proposed Chilton Neighbourhood Centre.

- ii) Increased allocation of recreation and leisure facilities to 8.2 hectares of land. This change was proposed in response to concerns that the original allocation was insufficient to meet the needs of the new community. The allocation was increased following discussions with the developers and is incorporated into the layout provided in the Masterplan framework.
- iii) Reduced allocation of site for neighbourhood centre from 4.7 hectares to 3.1 hectares. This change was proposed as a consequence of the changes in respect of the Tesco superstore, which means that provision for a new superstore site central to the development is no longer required. The allocation is now proposed to provide 1.55 hectares of land for retail use and 1.55 hectares for community facilities.
- iv) Relocation of site for waste transfer station, household and recycling and refuse depot from the employment site north of Waldingfield Road to a site within the general employment area to the north of the Woodhall Business Park. This change was proposed in response to significant concerns raised by residents about the siting of the facility with respect to residential amenity and traffic generation. In its new location it will be accessible from a road of suitable standard for HGVs and be remote from housing. Consideration of vermin, smell, health issues etc may remain issues in this different location, but it is considered these can be dealt with as part of the design and management of this facility.
- v) Revision of proposals map to reflect pre-inquiry changes and outcome of discussions between the Council and the developers in respect of layout and content of Masterplan framework. Key changes include realignment of distributor road around edge of site for potential expansion of Tesco and refinements to cycle route network to ensure maximum accessibility and permeability by providing logical linkages between new and existing routes. The community woodland has been extended in a number of locations in response to further analysis of landscape issues and some of the changes to the other proposals within the package. The woodland and the new connections into existing Rights of Way are intended to deal with the issues raised in PPS7 mentioned in paragraph 3.6 above.

## **6. The Chilton Masterplan**

6.1 The Chilton Masterplan has been produced in partnership with Ashwells and following a considerable amount of community engagement. This included stakeholder meetings, public exhibition and consultation on issues and an exhibition and consultation on proposals. The purpose of the document is to provide a level of detail that is not required for the Local Plan and try to resolve some of the objections made at 1<sup>st</sup> and 2<sup>nd</sup> deposit stages. Part of the consultation considered the name for the development and Chilton Woods was selected. The full title of the document is the Chilton Woods Masterplan Framework (Core Document 36). The Masterplan has been adopted by the Council for use at the Public Inquiry. It is intended to be helpful and informative and to demonstrate the viability, practicality and deliverability of the development, but it should be remembered that the Local Plan Inquiry is considering the policies and proposals in the Babergh Local Plan Alteration No 2, not the Masterplan itself.

## **7. Key Issues raised by objectors**

7.1 At the First Deposit Draft stage, 127 duly made objections to Chapter 12 of the Plan were received. 216 duly made objections to the Second Deposit Draft Plan were received. At both stages, many of the representations related to the detailed wording of Policy CP01 or the supporting text. There were however, a number of key issues raised relating to the Chilton package which may be summarised as follows:

- i) The Chilton development should not go ahead until there is a firm commitment to the Sudbury Western Bypass. Concern that the existing road infrastructure will be unable to cope with extra traffic generated by the development, and this will lead to more congestion in Sudbury town centre. Particular concern about the inability of the B1115 to cope with increased traffic levels. Also concern about the relationship between residential areas within the development and traffic generated by the employment and bulky goods retail sites.

- ii) The requirement for 35% affordable housing at Chilton is unjustified, as the other residential sites in the District are only required to provide 20-30%. The prescriptive nature of a single figure and not a range could be misleading and fails to accurately describe the appropriate amount of affordable housing required for the Chilton development.

## **8. Response to key issues raised by objectors**

### **Traffic and highway issues**

- 8.1 Many representations refer to the perceived need for provision of a western bypass for Sudbury before the Chilton development goes ahead. As explained in paragraph 5.14 above, there is no link between development at Chilton and the provision of bypass. The need for the bypass cannot be substantiated by the Chilton development, which would not contribute unacceptably to congestion in Sudbury subject to the carrying out of certain improvements.
- 8.2 In July 2003 Suffolk County Council submitted an Annual Progress Report on their Local Transport Plan to the Department for Transport including an Assessment Summary Table for the Sudbury Bypass. In December 2003 in a letter on the 2004/2005 Local Transport Capital Expenditure Settlement the DfT determined not to support the Bypass for a number of reasons and indicated that they would not fund the Bypass at the present time. They recommended that the County Council should consider reducing and managing the impact of high traffic volumes through the implementation of measures within the town centre.
- 8.3 The DfT recognised that these measures may not meet in full the objectives of the bypass and that the County Council should monitor the situation over a number of years before any further consideration is given to bypassing the town. There remains some prospect of a bypass within the Plan period and the County Council have asked that the route continue to be protected. However there is great uncertainty about delivery and even if it can be achieved this could only be in the very late part of the Plan period close to 2016. In these circumstances any link between the Chilton development and the bypass would be untenable and in light of recent traffic modelling and analysis, is now considered unnecessary.

- 8.4 A Traffic Impact Analysis (TIA) of the Chilton proposals has been carried out by consultants (Core Document 36a). The report concludes that traffic generated by the development can be accommodated within the existing network subject to certain improvement works being implemented. The recommended improvement measures are contained in Local Plan Policy CP01. The assessment was made on the basis that the need for all access would be met by vehicular movements. In other words the work was done on the basis of the worst possible case in terms of vehicular traffic generation. The provisions for sustainable access are made through the location of the development itself in relation to schools, jobs and facilities outside the development area, the layout of the uses within the area and the provision that would be made for walking, cycling and using public transport. The options for avoiding the use of the car for many shorter journeys should therefore be available and reduce the potential impact of traffic. Further work will be done on a transport assessment for the development (as required by PPG13 at the planning application stage) and it is likely that this will be available for the Local Plan Inquiry.
- 8.5 In addition to the TIA, work has been carried out by consultants to consider the form which junction improvements might take and to test the feasibility of carrying out such proposals. In some cases a number of different options for dealing with the improvements have been drawn up. These are detailed issues which would be dealt with at the planning application stage and it is not considered the Local Plan Inquiry should be concerned about them. It is important at this stage that the feasibility of junction improvements is established in principle.
- 8.6 The Local Transport Action Plan for Sudbury and Great Cornard has yet to be completed. As noted in paragraph 8.4 provision for improvements set out in CP01 will be provided for through the development. Additional measures to reduce the environmental impact of traffic and as far as possible improve movement in the town for all modes of travel are expected to be implemented separately through the Local Transport Action Plan.

- 8.7 Work has also been carried out for the County Council, as an independent check on the traffic analysis work referred to above. The work looked at traffic growth up to 2016 when it is assumed the Chilton development will be completed. It took into account growth forecasts and other permitted developments within the town. The result was traffic growth in the order of 8 to 9%. Such growth is unlikely to be discernible to users of the road network, particularly given the length of time over which the growth will take place (Core Document 36b).
- 8.8 It is also important to consider the more sustainable modes of travel – walking, cycling, public transport - which are all provided for in the Chilton proposals. The development will be designed to encourage and facilitate sustainable modes of travel, widening travel choices and reducing private car reliance. The government’s planning guidance emphasises the importance of sustainable transport as priorities over the use of the car and the Chilton proposals will provide good opportunities for people to choose not to use their car for certain journeys. Some objectors are concerned such provision will not be used and are sceptical of their provision and potential impact on traffic levels. The government’s guidance is clear that such provision is essential. It is considered the proposals for ‘soft’ travel modes have been integrated into the proposals and there is every prospect that they will be used. It is agreed that the extent will be influenced by the behaviour of individuals and their circumstances, but there should be comfort from the TIA which indicates that with no use of alternatives there will be no over-riding traffic problems.

### **Affordable Housing**

- 8.9 The provision of an adequate level of affordable housing is a key priority of the Plan. As explained in paragraph 5.20 above, the required level of affordable housing for the Chilton development was increased from a range of 20-30% in the First Deposit Draft to a figure of 35% in the Second Deposit Draft. This was in light of the findings of the Housing Needs Survey 2000, which indicated that the Sudbury/Great Cornard area has the greatest housing need in the District and accounts for more than 67% of the District’s overall net shortfall of affordable housing. The survey recommended that site development briefs should attempt to ensure that that all housing is provided to meet the needs of all households on an adequate scale. The requirement for 35% affordable housing at Chilton is based on an identified need and is therefore wholly justified.

## **9. Conclusion**

The Chilton development proposal is fully compliant with national, regional and structure plan guidance. It is a key strategic element of the Plan and will accommodate a significant proportion of the District's housing and employment growth during the Plan period. A high quality, sustainable development will be created, with an integrated mix of land uses that will provide benefits for the town as a whole.