

Mr Nicholas Ward  
Head of Development Control  
Babergh District Council  
Corks Lane  
Hadleigh  
Ipswich  
IP7 6SJ

For the attention of Ms Deborah Board, Planning Officer

Dear Mr Ward

**Land east of Brundon Lane & Bulmer Road, Sudbury – Outline application for the redevelopment of existing buildings and erection of 43 No. dwellings and 4 No. commercial units B/11/00421/OUT**

I am writing on behalf of the Suffolk Preservation Society ('the Society') to submit representations concerning the above outline planning application for redevelopment. The Society has concerns regarding the principle of residential development on this site allocated for employment use and the detailed design of the development.

**Principle**

The application site is allocated within the Adopted Babergh Local Plan (2<sup>nd</sup> Revision) 2006 as a General Employment site at Policy EM02. The retention of employment sites is specifically identified as one of the key strategic objectives of the local plan (para.1.13 refers). This issue has also emerged as one of strategic importance as part of the LDF Core Strategy process that has identified outmigration from Babergh District for employment opportunities as one of the structural issues that should be addressed through the LDF. The Adopted Local Plan identified that the local economy of Sudbury and Great Cornard suffers from a general lack of investment and 'remains extremely fragile and over-dependent on a large motor engineering sector' (para.4.5). The Society is concerned that the loss of a further well located employment site will perpetuate these structural issues for the Sudbury economy and further encourage unsustainable patterns of employment. The applicants' cite EM24 in justification of the proposed change of use to residential. The Society believes that the provisions of EM24(1) have not been satisfied, insofar as there appears to be reasonable uncertainty surrounding the marketing of the site for employment uses. In particular, the site was acquired by a residential developer in 2008 and in the intervening period the market has been subject to an unprecedented protracted economic downturn. It is submitted by the Society that the site is of strategic importance for employment and given the long term importance of the site and the acknowledged economic fragility of the local economy the employment use of the site should not be surrendered lightly. In particular, evidence of a significantly longer marketing period should be sought having regard to the unique economic circumstances.

## Detailed design proposals

Notwithstanding the concerns raised above to the principle of residential use of this employment site, the Society has significant design concerns accepting the outline form of the application. The Society notes the applicants apparent references to the Elmswell development of affordable homes by the Orwell Housing Association following the RIBA design competition sponsored by the Suffolk Preservation Society. The Elmswell scheme was driven by a strong underlying philosophy of sustainable construction that in turn informed the aesthetics of the scheme. The Society finds no such credentials in the current scheme. Instead, the scheme is derived from the award winning Elmswell scheme only insofar as the buildings have quirky fenestration and strong asymmetric geometric form. There is no synergy between the materials, aspect and energy efficiency of the scheme. Whilst the creation of a robust built street frontage is welcomed, the proposals fail to address matters of microgeneration, the efficient use of energy and materials (policy EN09) or water conservation (policy EN13). These issues represent fundamental omissions that should have informed the design (including materials, energy/water conservation, layout and aspect) to achieve compliance with 'saved' local plan policies.

## Conclusions

In the opinion of the Society, the case for a change of use of this established employment site has yet to be made. The proposal is therefore premature and contrary to policy EM02 that seeks to protect General Employment sites and only to permit their alternative use in exceptional circumstances. In the event that such a robust case was made, the scheme lacks the essential credentials of sustainable construction to comply with the national agenda (PPS1: Planning and climate change supplement) as reflected in adopted local plan policy.

The Society requests that these representations are reported to Members of the councils development control committee to aid their consideration of the proposals.

Yours sincerely



Simon Cairns

IHBC MRTPI

**Director**

CC: The Sudbury Society, SPS Babergh Committee, Sudbury Town Council