

24 November 2020

Taylor Wimpey
Chilton Woods Public Consultation
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For the Attention of Mr S Caslin

Sent by email: Samuel.caslin@taylorwimpey.com

Dear Mr Caslin

Taylor Wimpey Public Consultation Exercise - Draft Design Code

Ref: B/15/01718 (with all matters reserved except for access) which is for the erection of up to 1,150 dwellings (Use Class C3); 15ha of employment development (to include B1, B2 and B8 uses, a hotel (C1), a household waste recycling centre (sui generis) and a district heating network energy centre); village centre (comprising up to 1,000m2 Gross Floor Area (GFA) of retail floor space (A1, A2, A3, A4 and A5), village hall (D2), workspace (B1a), residential dwellings (C3), primary school (D1), pre-school (D1) and car parking); creation of new vehicular access points and associated works; sustainable transport links; community woodland; open space (including children's play areas); sustainable drainage (SuDS); sports pavilion (D2) and playing fields; allotments; and associated ancillary works.

Chilton Woods Mixed Development Land North of Woodhall Business Park Sudbury Suffolk

Introduction

The Suffolk Preservation Society (SPS) is a non-political, independent, self-funding charity whose charitable objects are to promote the conservation, protection and improvement of Suffolk's physical and natural environment for the public benefit by ensuring any change is undertaken sympathetically and to the highest level of design and sustainability.

I am writing on behalf of the (SPS) having reviewed the draft design code and viewed the recorded version of the Taylor Wimpey presentation. The SPS champions high-quality design and we welcome the opportunity to participate in this important public consultation exercise. We support all initiatives to raise design standards of new development in the county and wish to participate constructively in this exercise. However, the Society shares the disappointment expressed by many

in the local community, including the parish councils, that the expectations of a strong design and landscape led scheme have not been met by the draft design code. We are also dismayed at the very short consultation period of 9 days for 1150 dwellings, given that one would in most cases have 21 days to respond to a domestic extension. This unnecessarily short timescale disadvantages many in the community, a fact which is only exacerbated by the ongoing lockdown in response to the global pandemic.

We wish to make the following preliminary response to the draft design code and reserve our position in raising further points at a later stage.

Limitations of the Design Code

We are aware that concern has been expressed about the limited extent of the design code. However, having reviewed the decision notice, we acknowledge that the draft design code is in conformity with the relevant condition of the outline consent which only relates to the residential quarter. Therefore, we will limit our comments to the following issues:

Limited range of reference documents

We are disappointed to note that the National Design Guide (October 2019) is not referred to within the document nor is the NPPF/NPPG which are seminal documents and which should form part of this bibliography. Moreover, the ten key characteristics of good design set out in the NDG should be referenced throughout the design code as a checklist of that the proposed code relates to the principles of good design advocated by the government.

Poor response to climate change

We are disappointed by the document's very limited response to the climate emergency. A scheme of this scale represents an opportunity for a highly responsive approach to energy efficiency, sustainable architecture and nature-based solutions. Suffolk County Council has declared a climate change emergency and has a goal of being carbon neutral by 2030.

There is no reference to the use of renewable heating technologies nor brown water management systems. In our opinion the design code must address the need to reduce energy consumption and adopt energy efficiency measures such as maximising the potential for energy supply from decentralised, low carbon and renewable energy sources, such as ground source heat pumps and district heating systems. Furthermore, making efficient use of fossil fuels from clean technologies is an essential component in the delivery of large-scale mass housing if zero carbon targets are to be met.

The design code has an overreliance upon brick and cement renders instead of renewable materials such as hempcrete and lime. The standardised approaches to construction fail to take forward new opportunities for sustainable design and this is a major weakness of the document. Furthermore, no significant reference is made to green roofs, green walls, rain gardens and other urban green infrastructure. The street trees that are referred to in the code are small or medium sized ornamental trees which cannot provide the same landscape or visual benefits of landscape or forest scale trees.

Architectural Styling

The design code employs numerous images of traditional Suffolk building types from villages and towns such as Lavenham, Bildeston and Sudbury. All of these settlements have developed over many centuries and have evolved organically, growing incrementally to meet the needs and fashions of the time. This gives a variety of form, silhouette and morphology, with principal ranges being approximately 5m deep with accretions to rear and sides of narrower plan. However, the building typologies shown in section 4.5 appear to be consistently deeper and will result in much wider gables and very different proportions from the traditional vernacular building types depicted. This standardised *monopoly house* typology will not give the visual impression of traditional Suffolk house types and is considered to be misleading.

The SPS is disappointed that the architectural analysis in the document promotes a predominantly historicist and pastiche approach. There is little suggestion that a contemporary design approach could more effectively deliver the anticipated vision for Chilton Woods. A positive reference to contemporary design with an emphasis on the use of sustainable materials and techniques, fit for the challenges that society is facing today, would make the document significantly more robust.

Place making, urban streets, public spaces

The SPS considers that there is inadequate integration of landscape within the development with allotments, natural spaces and woodland pushed to the edges of the site. These open spaces are critical to wellbeing and need to be easily accessible to all and fully integrated into the residential quarters. However, the design code shows these vitally important elements pushed to the margins limiting accessibility for residents.

While it is acknowledged that this is largely in conformity with the Masterplan, we would stress that this is illustrative and as the iterative process unfolds the layouts should be refined. The SPS considers that the document relies too heavily on this indicative plan and SPS would have hoped for a more imaginative and considered response to the needs of integrating open space within the residential elements of the scheme.

The National Design Guide advocates, and is clearly demonstrated by the ongoing pandemic, the need for accessible open green space to ensure healthy and successful places for people live. It states that well-designed places should *provide attractive open spaces in locations that are easy to access, with activities for all to enjoy, such as play, food production, recreation and sport, so as to encourage physical activity and promote health, well-being and social inclusion*. The SPS is concerned that the draft document does not achieve this fundamental requirement.

We note that the Masterplan shows a lesser quantum of development in the village centre than the draft document. The SPS is concerned that this fails to follow the spirit of the original vision for Chilton Woods, as it was anticipated that it would be a focus of community uses and spaces and not a predominantly residential quarter. This is a serious departure from the Masterplan which SPS considers a retrograde step and should revert to the original concept.

Conclusion

The community aspire to an exemplary scheme as the development will be the largest in the district over the next decade. The expectation is that the design code will facilitate a development that will provide a strong sense of place, and that is resilient enough to adapt to the threats posed by climate change. Sadly, the aspirations for a high quality, highly sustainable and beautiful development are unlikely to be delivered by this design code. It appears to offer standardised layouts and treatments

and does not provide innovative or particularly interesting solutions to meet the challenges of today and tomorrow.

It demonstrates an over reliance upon vernacular precedents and does not promote contemporary, imaginative or sustainable design. It is limited by its reliance upon old technologies and standard treatments of place making. Regrettably it does not deliver a strong green led agenda, with the limited landscaping and open space relegated to the margins of the development site.

The SPS strongly recommends that the draft document is put before the Suffolk Design Review Panel for independent assessment to ensure that the vision of Chilton Woods which the community has been promised, and has a right to expect, can be effectively delivered.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Fiona Cairns', with a stylized flourish at the end.

Fiona Cairns IHBC MRTPI
Director

Cc Chilton, Acton, and Great Waldingfield Parish Councils
Sudbury Town Council
Steven Stroud – Major Projects Officer – BMSDC
Suffolk Design Review Panel