

**STATEMENT OF CONSULTATION**  
**Regulation 18 (4) (b) Town and Country**  
**Planning (Local Development) (England)**  
**Regulations 2004**

**Development Brief**  
**Hamilton Road Quarter, Sudbury Town Centre.**  
**Policy SD06 Supplementary Planning Document**

**February 2010**

# Hamilton Road Quarter, Sudbury Consultation Statement

## 1. Introduction

This document sets out how Babergh District Council involved the public in the preparation of the Hamilton Road Quarter, Sudbury Town Centre Development Brief for the Babergh Development Framework in accordance with Regulation 25 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 and in accordance with the Babergh District Council, Statement of Community Involvement (SCI) adopted in December 2006. The SCI can be viewed on our website at:

<http://www.babergh.gov.uk/Babergh/Home/Planning+and+Building+Control/Local+Development+Framework/Statement+of+Community+Involvement.htm>

This statement sets out the following:

- Who was consulted during the Hamilton Road Quarter consultation,
- How these persons and bodies were consulted;
- The number of representations made and a summary of the main issues raised by the representations; and
- How the main issues raised was taken into account in the preparation of the Development Brief (Supplementary Planning Document).

## 2. Who was consulted?

Consultation on the Hamilton Road Quarter took place from the 26<sup>th</sup> October 2009 for six weeks till the 4<sup>th</sup> December 2009.

Over 140 letters were sent out to key stakeholders, organisations and residents that live adjacent to the site. This included consultation bodies set out in regulation 25 of the Town & Country Planning Regulations 2008 and the LDF Statement of Community Involvement 2006. For a full list of consultees see appendix A.

## 3. Methods of Consultation

The following methods of Consultation were utilised to consult the public on the Hamilton Road Quarter Development Brief.

### Public Exhibitions

Four public exhibitions, with an estimated 1000 visitors, were held across in Sudbury to inform the general public about the Development Brief and the 3 Options. These “drop-in” sessions were held at:

- St Peters Church on 29<sup>th</sup> October 09
- Sudbury Town Hall on 31<sup>st</sup> October 09
- Sudbury Town Hall on 14<sup>th</sup> November 09
- St Peters Church on 27<sup>th</sup> November 09

Several information boards were displayed at the public events, outlining the three options and how to get involved. Officers were present at the exhibitions to discuss the three options and the development brief with members of the public. Leaflets and response forms were distributed to the public at the exhibitions.

#### Static Exhibition

During the public consultation a static exhibition was displayed in the Sudbury Town Hall with display boards showing information on the three options and on the consultation.

#### Newsletters

A Fortnightly newsletter was sent to the Key Stakeholders which was aimed at keeping them up-to-date with the initial consultation stage.

An article was also published in the Babergh Matters Winter 2009 Issue that was circulated to all households in the district, with information on how they can get involved in the consultation.

#### Early Stakeholder Meetings

Before the Public Consultation Started there were some early meetings with the stakeholders which included community groups such as the Sudbury Town Council, Market Town Partnership & Sudbury Society, the Local Bus Companies and the Landowners on and adjacent to the site.

#### Websites

The Babergh District Council website had a page where the draft SPD could be downloaded and details of how send comments could be found. There was also a link to the OneSuffolk Website which had information on the three options and electronic response form. The OneSuffolk website attracted 2500 visitors.

#### Planning Documents

Copies of the Draft Supplementary Planning Document and Sustainability Appraisal/SEA were available for the public to view at Libraries across the Western side of the District as well as the Sudbury Town Hall and Planning Reception at the Babergh Offices. Posters and leaflets were also sent the Libraries and Town Hall as well as to the Parish Councils on the west of the district to put up on public notice boards. The leaflets were also placed in the Newspaper: The Mercury and was distributed to 19,000 households in Sudbury and the surrounding area.

#### Media

An official advertisement was put in the East Anglian Daily Times on the 2<sup>nd</sup> November 2009 stating when the exhibitions were and where the planning documents could be viewed. Informal adverts were also placed in the Suffolk Free Press. There were also many other articles on the Hamilton Road Quarter in the Suffolk Free Press, Mercury and East Anglian Daily Times during the public consultation. Sandra Scott also had an interview on BBC Suffolk Radio on the 26<sup>th</sup> October 2009. There were also 4 media releases.

#### Consultation Letters

As previously indicated over 140 Letters/emails were sent to key stakeholders, organisations and residents, Letters were also to the Parish Councils on the west

of the district. The letter provided details of how to comment, where to view the documents and details of the exhibitions.

#### **4. Summary of the main issues and comments raised through the Public Consultation.**

##### **Response to the Public Consultation Hamilton Road Quarter Development Brief SPD**

###### **Sudbury Town Council-**

- Indicated support for option 3. No further information/reasoning was included.

###### **Sudbury Chamber of Commerce-**

- Support Option 2 as it allows for the comprehensive redevelopment of the SD06 policy area;
- No need for a formal bus station- the lorry park should continue to be used as a layover and more consideration given to providing additional stops, sensitively designed around the town.
- Object to the roundabout proposed at the junction of Great Eastern Road, Station Road, as it is inappropriate and would be detrimental to the surrounding environment.
- Suggest that the congestion issue in this area be addressed another way, through creating an access off Cornard Road to the rear of Roys.

###### **Sudbury Market Town Partnership**

- Support option 2 out of the options proposed
- The whole area of SD06 should be available for redevelopment and space should not be used for the bus station
- The use of a layover area and bus stops around the town is adequate.
- If there is insistence to provide a formal bus station it should be located on land in front of the Kingfisher, on the car park (SD10) and the car parking replaced on the lorry park. This should have been put forward for consultation.
- Object to the proposed roundabout and would prefer to see shared space.

**Sudbury Society-** The Sudbury Society response was accompanied by a list of signatures which indicated the level of support for these views within the Society. There is a significant degree of overlap between these signatures, and those on the petition as well as some individual responses.

- The consultation should have included an option which locates the bus station on the site in front of the Kingfisher (Policy SD10 in the local Plan).
- Consider that the whole of the SD06 area should be redeveloped and retaining the bus station within it makes development unviable.
- If the bus station is retained on the site it will only allow for piecemeal development, as it loses the opportunity to create primary retail on the larger site area.
- Option 1 has dangerous conflicts between pedestrians and buses;
- Option 3 does not create frontage development on Great Eastern Road
- Object to Option 2 as presented for consultation
- Locating the bus station on the SD10 site would not be hindered by the need to acquire land as it is owned by Babergh District Council
- The roundabout is not supported as it is more suited to vehicles than pedestrians, shared space would be preferable.
- No research of bus users has been undertaken

#### **Bus Operators-**

Despite efforts made directly, and through existing forums established with the County Council no formal response has been received. Whilst this gives rise to concern, every effort has been made to secure their involvement. As design work proceeds to the next stage, continued efforts to engage with this group will be made.

#### **Consideration of the key issues raised by the Public Consultation**

<b>Key Issue- Principle of the need for a bus station in Sudbury</b>
<p><b>Context</b> Options 1 and 3 included in the public consultation provide for a bus station within the SD06 policy area. Option 2 removes the bus station from the site, and instead relies on bus stops along Great Eastern Road and elsewhere around the town, together with a layover or bus station away from the site. This is based on ideas put forward by the Sudbury Society and Sudbury Market Town Partnership. The presentation of these options has generated a number of issues about the need for a bus station in Sudbury. Although the options did not illustrate a specific location for facilities such as toilets, waiting area, seating, or information, it is the intention of Suffolk County Council to ensure these facilities are all provided adequately as part of any bus station developed in Sudbury</p>
<p><b>Summary of Representations</b> The need to retain a bus station and the associated facilities was one of the key</p>

concerns expressed, with many respondents indicating that a bus station facility in Sudbury was essential. This was further supported by a significant number stating that facilities including, toilets, covered waiting, seating and information are essential and that such facilities need to be improved. Others question whether a bus station is needed, and suggest that additional bus stops around the town would be adequate.

**Officer Response**

A bus station serves many important functions for the bus passengers and operators. It brings together, information and a comfortable and safe environment for passengers. It also provides the opportunity for passengers to interchange between services, as well as provide sufficient capacity for current and projected services. As a busy market town, with a large rural hinterland, Sudbury is the destination and interchange for many bus routes. Many people, particularly, the older population, rely on buses in and around Sudbury for many journeys including, shopping trips. It is therefore considered that the type and level of use, together with the role that Sudbury has as a town centre in the area, justify the need for a bus station, with all of the associated facilities to be provided in Sudbury town centre

**Key Issue- The preferred location for a bus station**

**Context**

The three options presented illustrated possible locations for the bus station (plans attached as appendix a);

**Option 1-** Within the SD06 policy area to the north of the site, off Great Eastern Road;

**Option 2-** Bus stops on Great Eastern Road and other locations in the town, with a layover or bus station away from the SD06 site. Locations listed in the consultation which had been suggested by stakeholders include, the lorry park, Girling Street Car Park, land off Station Road (adjacent to the Kingfisher car park).

**Option 3-** Within the SD06 policy area in the south east corner of the site, along Great Eastern Road.

**Summary of Representations**

The representations received indicate support, objection, or comments in respect of the options proposed. Some alternative locations for the bus station are also suggested by some respondents. The breakdown of support for each of the options is;

Option 1- 27%

Option 2- 13 %

Option 3- 46%

Object to all 3 options 14%

The proportion of respondents indicating support for an alternative option being promoted (referred to by objectors as option 4-was 6% (these are counted in the breakdown as objecting to all 3)

The most common concern expressed regarding the location of the bus station was the importance of it being centrally located close to the town centre, with good access to the shops

**Officer Response**

It is considered that is significant merit in the bus station being situated in a central location. Most passengers visiting Sudbury by bus are using the town centre. Many

of them are elderly or have limited mobility and as such benefit from arriving as close to the destination as possible. When departing by bus it is also beneficial to be able to wait for the bus in a safe and comfortable environment, with clear information provided about the services, and again for these facilities to be as close to the town centre as possible. The SD06 policy area is considered to be a good location for a bus station, in that it is a town centre location and is also well located in relation to the railway station, for those wishing to interchange between rail and bus travel. In this context option 1 and option 3 provide the opportunity to achieve a centrally located bus station. The concept of locating the bus station as close to the town centre as possible, is consistent with broad sustainability objectives which should be encouraged if the opportunity to achieve this exists.

**Key Issue- Local Plan Proposal SD10 and the Civic Trust Report have not been considered and should have been put forward for consultation**

**Context**

The Local Plan includes Policy SD06, which is the mixed use policy which is the subject of the Development brief SPD. This policy makes provision for the retention and improvement of the bus station, into the scheme, or alternatively relocating to a different, but equally suitable site in the town centre. The same Local Plan also includes Policy SD10, which provides for an alternative site on the northern part of Station Road car park to provide for a bus station – if a bus station is not accommodated in a mixed use scheme. In relation to this policy the Local Plan also refers to the need to deck the Station Road car park to provide further spaces. The policy suggests that the bus station may be relocated to this site, if it can not be accommodated within the mixed use scheme (SD06) and that if this were to be implemented, then it would be dependant upon the additional car parking being provided by decking Station Road car park.

In 2006 The Civic Trust prepared a Feasibility Study for the SD06 area for the Sudbury Market Town Partnership. This was a sound study which provided a good context and background from which to consider the opportunities and constraints for the study area. The feasibility study looked at the opportunities for the wider policy area, based on a number of assumptions. The options proposed for public consultation focused on the Hamilton Road area of the site, being the area with the most opportunity for delivery at the present time, based on the concept of a phased approach. It also assumes the Bus Station will be relocated away from the SD06 site, possibly to the SD10 policy area. The Civic Trust Feasibility Study has been used by Officers as a sound evidence base and to assist with early consideration of the opportunities and constraints associated with the site. The public consultation has used the academic background to establish an initial phase which is likely to be achievable. Option 2 is based on the concepts put forward in the Civic Trust Study.

**Summary of representations**

A number of representations have been received indicating that policy SD10 and the Civic Trust report have not been considered. Further correspondence has also been received which makes the same point with this information provided on a petition leaflet. 12 formal responses support this concept with a further 46 standard signed forms sent collectively, these have been registered and reported as a petition. In addition the Sudbury Society also indicates that this alternative should have been considered.

**Officer Response**

The Local Plan provides for the Bus Station to be accommodated in mixed use scheme- Given that a central location for the Bus Station, is provided for under policy SD06 and is supported by sustainability principles it is reasonable to explore options which suggest this is achievable within the context of the wider objectives of the policy SD06 mixed use scheme. SD10 and supporting text paragraphs 10.35 and 10.37 indicate it can provide for alternative Bus Station if it can not be accommodated within the mixed use scheme- Options 1 and 3 indicate that it can.

SD10 is not as central, its implementation is linked in the Local Plan to decking of the Car Park. The cost of this will not allow for Babergh District Council to commit to this in foreseeable future, so there is a need to pursue options which are more likely to be achieved.

Officers at Babergh District Council and Suffolk County Council have thoroughly considered the issues concerning the location of the Bus Station over a number of years, including the possibility of the SD10 site. However, it is considered that the SD06 area has advantages in terms of a central location and sustainability advantages

**Key Issue- The Mix and proportion of uses on the site****Context**

The policy area SD06 is intended to accommodate mixed-uses, featuring retail, leisure or other commercial uses, with an acceptance for some residential use as an integral part of a mixed use scheme. The key objectives listed in the policy include the creation of a safe and continuous pedestrian route between Great Eastern Road and Market Hill and to allow for the retention and improvement of the bus station. The options put forward for consultation, all refer to a mix of uses appropriate to a town centre location and allow for the consideration of the location of an improved bus station, whilst enabling an integrated mixed use scheme to be established. The proposals did not prescribe in detail the location of various uses, but instead indicated the overall types of uses which would be appropriate. These included, retail- (particularly on ground floor levels), leisure- (particularly those uses which contribute to the evening economy eg cafes, restaurants, cinema uses, as opposed to night time), other commercial or economic uses and residential, particularly on upper floor levels.

**Summary of Representations**

The comments on this issue are wide ranging and in many cases conflicting views are expressed. The main concept which relates to those objectors who consider that the bus station should be located away from the SD06, is that the whole area should be developed for commercial development. Some suggest that this would be attractive to developers and may attract a large anchor store (national retailer) which some consider to be essential to the delivery of development on this site. On the contrary, some representations consider that the area should be developed with small retail units and a few suggest that more of the site should be used to accommodate the bus station to provide it with more space. A number of people are concerned that additional shops are not needed, particularly given the current economic climate and the closure on some units in the town. A few consider that the site is not suited to

residential use and that retail, leisure uses are not an appropriate mix with residential. A further concern is expressed in relation to evening uses, with a particular resistance to any uses which encourage more takeaways or night club activities. Finally a few individual comments made were that existing businesses should not be pulled down and lastly that the site should house the market (under cover) and that the bus station be provided on Market Hill.

**Officer Response**

A response to the detailed individual comments is provided in the table of responses, an overall summary of the main issues raised is provided here. All 3 options proposed suggest that ground floor uses should primarily, be retail use with the upper floor uses being a mix of leisure, commercial and residential. This is considered to be an appropriate mix of uses for town centre sites, supported by the policy guidance provided by the recently published PPS4, which refers to encouraging upper floor uses to be commercial or residential with retail and leisure uses forming the primary focus of development in such locations. The proportion of these uses may vary depending upon the actual use and the design and layout of any development. Option 1 and 3 require part of the site to accommodate the bus station, again this concept is supported, by PPS 4 promoting sustainable economic development ensuring that retail, leisure and economic development is easily accessible by public transport. The schemes proposed under options 1 and 3 provide approximately 2000 sq-metres of retail floor space, based on ground floor retail uses. Option 2 achieves additional retail floor space, estimated at 2250 sq-metres. Although this was questioned by some objectors, it is considered that this estimate is accurate and is based on sound professional advice. The gain in floor space is not considered to outweigh the benefits associated with integrating the bus station with the scheme and being located centrally. In all cases it is considered that the mixed use scheme should focus on achieving retail, commercial and appropriate leisure uses, with appropriate planning controls ensuring that inappropriate night time uses are not established. Residential uses are considered to be appropriate, as an integral part of a mixed use scheme, particularly as an upper floor use.

**Key Issue- Great Eastern Road Junction**

**Context**

In preparing the options for consultation the operation of the Great Eastern Road Junction with Station Road was considered. It is generally agreed that the current junction is difficult and would benefit from improvement, irrespective of the future location of the bus station. As such a number of options for the junction were considered, including traffic lights. It was considered that a roundabout has a number of benefits and would allow for the implementation of any of the 3 options proposed. (In the case of option 2 this would be essential unless another area beyond Station Road were provided for the buses to turn). The roundabout has been through preliminary design to ensure its intended use is operationally acceptable. Later stages of design for improvements to this junction could result in further consideration of other options for enhancing the current arrangement.

**Summary of Representations**

The comments in relation to the junction of Great Eastern Road and Station Road largely welcome this improvement. A few concerns were expressed about whether it was adequate for the required bus movements / turning. Others consider that an alternative junction improvement may be preferable, such as traffic lights and a few suggest using shared space for this junction.

**Officer Response**

It is agreed that the junction is in need of improvement, the detailed design for any improvements will require further consideration by Suffolk County Council which will include ensuring that the most appropriate junction improvements are implemented. A roundabout was considered to have most advantages when the consultation options were proposed. As work progresses on the next stage all options will be thoroughly considered. Advice from SCC and the urban design professional (consultant employed to advise BDC and SCC), suggests that the junction and the type and level of use does not lend itself to the concept of shared space. An example of where this is being widely introduced is a scheme in Felixstowe, which has a very different role in respect of traffic use.

**Key Issue- Deliverability****Context**

The draft SPD, suggests a phased approach to development, to bring forward elements of the scheme which have potential to be delivered. SCC have funding allocated in the Local Transport Plan in the current financial year, with the expectation to deliver as soon as possible, otherwise funding may be channelled to other projects. Much of the SD06 site is privately owned, and interest has been expressed by landowners to progress with appropriate proposals following Adoption of the Development Brief. The preparation of design guidance such as this, provides a clear direction for developers, which is intended to aid the planning process and assist with delivery.

**Summary of representations**

A number of representations expressed concern about the ability for schemes which require land acquisition to be delivered, in particularly suggestions were made that option 1 and 3 could only come forward with Compulsory Purchase which was considered to be an unlikely action, due to costs and timescales. This point was further emphasised by those suggesting an alternative site for the bus station away from SD06, on land owned by the Council, removing the need to acquire land to provide the bus station. Other comments related to deliverability, include the extent to which retailers and developers would be interested in development, particularly if the whole site is not available for commercial development.

**Officer Response**

It is considered that there is a commitment to proceed with delivery from both Babergh District and Suffolk County Council. Negotiations can commence as required following Adoption of the Development Brief. Land assembly need not require Compulsory Purchase Orders, funding from SCC and the HGP, together with existing landownership and private developer interest are all potentially available to influence the outcome of negotiations to enable necessary land assembly for the bus station to be developed, if required. The retail needs assessment (2008) indicates that there is a need for additional retail units in Sudbury, and developer interest on a part of the site, is likely to demonstrate that an appropriate scheme can be delivered. If the bus station were to be relocated to land in front of the Kingfisher, on the car park, delivery would be subject to significant consequential actions, including decking the existing car park or providing additional car parking on the lorry park. Both of these with significant cost and timescale implications which would seriously constrain delivery.

## **Appendix A: List of Consultees**

### **Stake Holders:**

#### Community Groups

Sudbury Market Town Partnership  
Sudbury Society  
Sudbury & District Chamber of Commerce  
Sudbury Town Council

#### Residents/Land Owners

1-7 Bank Buildings  
11-31 Station Road  
29 King Street  
6 & 6a Great Eastern Road  
Easterns (Station Lounge)  
Winch & Blatch  
Netta's Drycleaners  
Street Life  
Owner of Carpet Warehouse and MOT Garage  
Owner of Queens Garage  
Owner of Land on West of Site  
Owner of Borehamgate precinct

#### Bus Companies

Felix Taxis  
Beestons  
Chambers  
Hedingham & District omnibuses

### **Statutory Consultees (Statement of Community Involvement)**

Acton Parish Council	Preston St Mary Parish Council
Alphamstone & Lamarsh Parish Council	Shimpling Parish Council
Alpheton Parish Council	Somerton Parish Council
Anglian Water Services Ltd	Stanstead Parish Council
Borley Parish Council	Sudbury Town Council
Boxted Parish Council	Suffolk County Council
Braintree District Council	Suffolk PCT
British Telecom	Thorpe Morieux Parish Council
Bulmer Parish Council	West Suffolk Health PCT
Bures Hamlet Parish Council	West Suffolk Hospitals NHS Trust
Bures St Mary Parish Council	Department for Transport
Cavendish Parish Council	Development & Infrastructure
Central Suffolk PCT	Energy Saving Trust
Chilton Parish Council	EDF Energy
Civil Aviation Authority	Planning Obligations Policy Manager
Defra	Suffolk Constabulary
Department of Trade and Industry	Suffolk Constabulary
East of England Development Agency	Mount Bures Parish Council

East of England Regional Assembly  
EDF  
English Heritage  
Environment Agency  
E-on  
Essex & Suffolk Water  
Essex County Council  
Foxearth & Liston Parish Council  
Glemsford Parish Council  
Go-East  
Great Cornard Parish Council  
Henny, Middleton & Twinstead P C  
Great Waldingfield Parish Council  
Hartest Parish Council  
Health and Safety Executive  
Highways Agency  
Home Builders Federation  
Lavenham Parish Council  
Lawshall Parish Council  
Little Cornard Parish Council  
Little Waldingfield Parish Council  
Long Melford Parish Council  
Ministry of Defence  
National Grid Transco  
Natural England  
Network Rail  
Newton Parish Council  
Norfolk, Suffolk & Cambridgeshire Strategic H A  
Office of Government Commerce  
Pentlow Parish Council  
National Grid  
Network Rail  
Suffolk County Council  
County Director of Education  
Suffolk County Council  
East of England Strategic Health Authority  
Ambulance Station,  
c/o Forest Heath DC  
Babergh Communities Together  
CABE  
First (Eastern Counties)  
Galloway European Coachlines Ltd  
Haven Gateway Partnership  
RTPI East of England Branch  
Sudbury & District Chamber of Commerce  
Sudbury-Marks Tey Rail Users Association  
Suffolk Acre  
Suffolk Chamber of Commerce  
Suffolk Development Agency  
Suffolk Police Authority  
Suffolk Preservation Society  
Suffolk Strategic Partnership  
The Sudbury Society  
Disabled Persons Transport Advisory Commission  
Club 88  
Cornard Tye Residents Association  
Oputa  
SCC Countryside Management Leader  
Suffolk Pensioners