



Saxmundham Town Council: Response to Final Draft Local Plan of Suffolk Coastal District Council

(approved by Saxmundham Town Council at its meeting on 11th February 2019)

Introduction and brief conclusions

This paper sets out the response of Saxmundham Town Council to the final draft Local Plan of Suffolk Coastal District Council. As requested by SCDC planners, we are completing the online version using this response, as set out below, so far as practicable. But for our discussions and records, and in particular as information for our local community, we need a complete version of the whole response, which is this document.

We are sending this to SCDC therefore as a response which duplicates our respective online responses. This Introduction is not duplicated online however, but forms an integral part of our response.

At various points below we refer to issues of “soundness” of proposals of the draft Plan, in relation to which we refer to the recognized tests under their broad headings of

- *Positively prepared* – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements... and consistent with achieving sustainable development;
- *Justified* – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- *Effective* – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- *Consistent with national policy* – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

For the most part, unless the context implies otherwise, and without prejudice to future contentions, our references in this response to issues or lack of soundness are mainly focused on the tests of justification and effectiveness.

Brief conclusions

In broad terms, and subject to our detailed comments, Saxmundham Town Council supports many of the general policies laid out in the final draft Local Plan, including those related to town centres of historic market towns such as ours.

We are also committed to seeing Saxmundham growing as a town. However, we continue to maintain (as in our earlier response to the first draft) that Saxmundham is being required under the Plan to take an excessive proportion of the new housing development over the Plan period (an increase of population of 50%), that is neither justified nor effective.

In relation to the Saxmundham Area Strategy, we welcome some important changes since the first draft, including the recognition – in the light of our and very many other responses – that the land to the east of the railway line (The Layers) should not be built upon, though this is still not adequately reflected in the policy drafting.

However, for many reasons, we remain at this point far from convinced that the key proposal – as it currently stands - for a new South Saxmundham Garden Neighbourhood (SSGN) meets the tests of soundness. And we do not feel that the case for a “split site” solution has been fairly or properly considered and weighed against the clear disadvantages of the SSGN scheme as presently proposed.

Comments and Proposals

General Policies

Section 1 - Introduction

Key issues – pages 7-8

There is no reference under the heading of “Key issues” to the changing nature of the district, in relation to huge new energy developments and the demands on the infrastructure and services that they will place (e.g. Sizewell C for nuclear, Scottish Power etc. for renewables). These are referred to in section 3, on Major Energy Infrastructure (from page 50) but not here.

They are changing not only the physical nature of our district, but also the economic, social and environmental balance. They may for example have a detrimental impact on current economic drivers such as tourism industry. These developments are – if they proceed – promoted as being for national benefit, not purely local, but the draft Plan is strangely silent on their impacts and the need to plan to protect local communities and the natural environment, as well as to seek to ensure that local people can benefit, so far as possible, from them.

Section 2 Wider Strategic Planning Area

Policy SCLP2.2: Strategic Infrastructure Priorities – page 20

This needs adding to, in order to reflect the necessary role of other players. The huge energy developments that are in the “pipeline” require equally huge infrastructure enhancements in our area – for example road and rail. These are justified as required for national purposes. There should be specific reference to EDF, Scottish Power etc. not simply as partners but as ‘actors’ who need to make proper financial and other provision. And there is a need to have a stronger ongoing relationship with central government, which needs to play its role more fully and not just assume local authorities and local partners can deal with the issues arising in an adequate way.

Section 3 - Suffolk Coastal Spatial Strategy

Vision for Suffolk Coastal 2018-2036

Again, this draft “vision” fails to recognize or respond to the extent and depth and problematic aspects (as well as offering real potential economic pluses) of the challenge our area faces, as the vast new energy developments take place together with other major change (not least affecting our town of Saxmundham). It is drafted as ‘apple pie’, and therefore fails to help or address the strategic planning issues we confront in the Plan period. It needs to take on board points made later (major energy infrastructure).

Boosting the Supply of Housing – page 31

We believe more emphasis needs to be placed on the need for more affordable and notably social housing over the coming period. We must also more fully address cater for those with many kinds of special needs, not forgetting those with mental illness as well as those with physical disabilities etc.

Finally, the supply of housing must be seen as integrally linked to higher design standards including eco-efficiency. Our suggested wording changes are in bold.

- 582 new homes per year (10,476 over the lifetime of the plan - 2018-2036) Increasing choice in the housing available;
- Meeting the housing needs of all sectors of the population,
- including the growing elderly population **and those with other special needs**;
- Delivering **a much higher percentage of** [delete 'more'] affordable appropriate housing, **including substantially more social housing**
- **offering better and more diverse design including eco-efficiency**

Distribution of Growth - Garden Neighbourhoods (page 33)

At paragraph 3.27, we read that “Opportunity exists through land allocations to follow the principles of Garden Cities as Garden Neighbourhoods for Suffolk Coastal”. A few points which broadly correspond to the principles are listed. However, in the glossary, the TCPA’s key principles are set out. These include:

- Capturing land value for the benefit of the community
- Strong vision, political support and commitment
- Long term stewardship of assets
- The majority of homes should be affordable
- Beautifully and imaginatively designed homes with gardens, combining the best of town and country living to create healthy homes in vibrant communities.
- Strong local cultural, recreational and shopping facilities in walkable neighbourhoods
- Integrated and accessible transport systems

Neither in this section, nor later in the specific section on the South Saxmundham Garden Neighbourhood, are all of these principles adequately or soundly reflected. Land value is not “captured” for the benefit of the community. Political support in the local community is not present, at least as far as the proposal is currently set out and drafted, not least because it has been a wholly top-down imposition, without engaging local people from the outset. At present there is no provision for long-term stewardship of assets, including the heritage assets. No adequate accessible transport “system” is yet proposed. In short, the case for a genuine Garden Neighbourhood, if it is to be ‘for real’ and not simply a marketing device, needs to be made far more robust, and needs to engage local people far more.

Saxmundham and the A12 (page 34)

Paragraph 3.30: We broadly agree with the statement here that

“Directing development to locations well related to the A12 will enable opportunities to make more use of the road and rail connections between Ipswich and Lowestoft. Increasing the level of development in these locations will help to sustain the existing communities and enhance the level of services and facilities found in this part of the District.”

Paragraph 3.31: We note the statement that

“A large proportion of development is focused on the Saxmundham Garden Neighbourhood...”.

We do not object to new housing development being more than proportionate to our town's size. We have consistently stated that we support reasonable growth of the town, and its area service role, provided this growth can be properly located and bring benefits (including the various kinds of infrastructure and public services).

We consider, however, from consultation to date and our own knowledge of the area, that housing growth in Saxmundham over the Plan period of around 500-700 homes would provide a more sustainable development and balance than the near 1000 (including pipeline development) now proposed, which represents a 50%+ increase in the town's size. We are not to date persuaded that the scale of development proposed is sound, on planning grounds. And we are not persuaded that the insistence that almost all the new housing (800 units) should be placed to the south of the town (the Garden Neighbourhood) represents a proper, sound or fair balance for the town.

The sentence quoted continues:

“...to enable the delivery of required education infrastructure, utilise the connections provided by the railway station and support the improvements to the A12 proposed as part of the Suffolk Energy Gateway Four Villages bypass.”

We note that EDF does not propose to carry out a Four Villages bypass, but a two villages version. The A12 and railway offer possibilities, but each also has limitations. And we must state again that development in Saxmundham is not required in a Garden Neighbourhood to enable the development of required education infrastructure. The need for more education infrastructure arises because of scale of the development proposed, not vice versa. We have previously (in our response to the first draft plan) set out the planning numbers as informed by County Council which show there is no current shortfall in primary or secondary provision in Saxmundham (though there is a shortfall in early years)

We support the next sentence:

“Saxmundham is geographically well placed in the District to provide employment opportunities for the communities in the north of the District and improve the connections between Ipswich and Lowestoft.”

We partially agree with the following sentence, which however gives a one-sided view of the issues arising:

“The emergence of Sizewell C Nuclear Power Station will also further support the strategic growth of Saxmundham as a Market Town with a variety of services and facilities.”

We hope and believe that if it proceeds, Sizewell C can provide some economic benefits, in jobs related to the energy sector, and in service related jobs. It may also bring problems of a social or environmental nature, including possible transport issues. We also need to stress that the future east Suffolk energy sector is due to comprise renewable energies as well as nuclear.

Paragraph 3.32: This contains some rather misleading points:

“Consultation responses have highlighted the need for further education provision, improvements to the capacity of the medical practice and congestion issues in relation to the B1119 and B1121 crossroads and access to the supermarkets on Church Street. This Local Plan seeks to address these issues through a comprehensive garden neighbourhood master plan for Saxmundham which will provide employment opportunities, primary school, residential units and other supporting infrastructure.”

While we acknowledge that 800 to 1000 new housing units may go some way to provide some benefits in terms of new social infrastructure, the new education provision is wholly geared to the new development itself (excepting early years provision), and the proposed enhancements to medical services will likewise mainly correspond to the needs of a much larger population in and around Saxmundham. Quite how a large increase in the town's population, wherever located, will help address the (occasional) congestion at the Chantry Road crossroads and access to supermarkets is at best an unexplained mystery.

Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District – page 36

We do not oppose most of the points in the Strategy for Growth here, but have reservations about aspects of point (f):

“The strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through:

...The delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham”

We are not presently persuaded that the proposals, in the form set out in the draft Plan, are sound in relation to the South Saxmundham Garden Neighbourhood (SSGN), for reasons set out in this response, or meet the aims of SCLP3.1.

Spatial distribution of residual housing requirement (page 38)

We note the estimated total requirement of 10,476 dwellings over the period 2018 - 2036, of which a large proportion is “already accounted for in outstanding planning permissions”. This gives rise to a residual further amount needed of 3,478 on top of which a further 900 or so or added as contingency – largely to be provided by “windfall” – to give an assumed total of 4,370. Of these, Saxmundham (plus parts of Benhall as part of the proposed Garden Neighbourhood) is being required to take 18% (see Table 3.3), though its population today is only around 4% of Suffolk Coastal's. Since we believe the current proposal for all to be located in the new Garden Neighbourhood is not presently shown to be sound, we need to express our reservation as to the soundness of the overall allocation to Saxmundham.

If the total allocation for our town is reduced by 200 units, which would enhance sustainability overall, Saxmundham would still grow by 40% or so over the Plan period, and still take around 14% of the total residual need housing requirement. (This amount could very simply be reallocated across the district without undermining any strategic goal of the Plan).

Policy SCLP3.3: Settlement Boundaries (page 49)

We have no specific issue with the text in general terms, but have a concern about the inter-relationship of this policy with the South Saxmundham Garden Neighbourhood (SSGN).

The SSGN is to be developed via consultation etc. on a Masterplan. However the policies set out in Policy SCLP12.29 (and indicative masterplan) rightly exclude housing, employment or town centre-type development on The Layers, for reasons including heritage, landscape etc. Yet the whole site is specified as being within the Saxmundham Settlement Boundary, which according to the general policy here in 3.3. seems to place the burden of proof on those arguing against development on the site. Either the policy needs to be amended to deal with such a situation, or the Saxmundham Site Boundary must be changed to exclude The Layers (and preferably land to the east of the railway).

We propose this addition to SCLP3.3 in order to ensure that the policy is sound and effective :

“New development within defined settlement boundaries will not however be permitted, where relevant policies of the Local Plan or Neighbourhood Plan so indicate, in relation to land which lies within a settlement boundary solely because it forms part of and is ancillary to (e.g. as open space) a larger overall site (e.g. Garden Neighbourhood) on other parts of which new residential, employment or town centre development is deemed acceptable under this Plan’s policies.”

Major Energy Infrastructure (from page 50)

We welcome the inclusion of this part of the Plan, which as indicated earlier, is not adequately included in the overall “Vision” of the Plan, given its huge impact and importance. It remains however that the impacts are not well integrated into the Plan as a whole. This however is in large part because neither central government nor the energy developers are playing their full or proper role in relation to securing adequate infrastructure, mitigation and (in last resort) compensation.

Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects

We propose to amend this Policy as follows (changes in bold) to address points that are missing in terms of overall coverage and soundness:

(b) Appropriate packages of local community benefit, **and protection from adverse impacts**, to be provided by the developer to offset and compensate the burden and disturbance experienced by the local community for hosting major infrastructure projects

Add new point after (h):

(.) Appropriate rail measures are introduced (including provision of double track for relevant routes) for construction, operational and commercial rail transport to ensure that passenger and freight services can work together effectively and that local communities are protected from adverse impacts;

Existing and projected new housing developments in Saxmundham (and SSGN) adjacent to the A12 will suffer at least a decade of disturbance from A12 construction-related traffic. They need protection from noise disturbance etc. as well as actual “Community benefits”.

On rail, if EDF go for the rail strategy, on current proposals there will be much night-time freight traffic causing serious disturbance to nearby residents (the railway goes through town residential areas) so the Plan needs to deal with this as well as road-related issues. Double track for all of the route where freight and passenger services need to co-exist is essential to ensure that the benefits of the railway (which is one of the key arguments for the scale of development in Saxmundham) actually exist, and that as few night-time freight movements as possible are necessary.

Policy SCLP3.5 Infrastructure Provision (page 56)

We propose that reference needs to be made in this policy to provision and linkages (junctions) of estate roads in new developments to the existing highway infrastructure, to ensure that the new junctions achieve the best and safest result. Thus, the SSGN current proposal is for a single road entrance/exit to the A12 for a site with 800 dwellings and other activities, and employment uses on the west side of the A12. The SSGN at minimum would require roundabout connection, but this policy statement does not clarify whether this kind of junction is a development cost to be borne by the developer, and if not, how to ensure that proper provision is made.

We are also concerned that within the SSGN proposal, much of the housing (approx.. two-thirds) will be within the rural parish of Benhall, whereas Saxmundham as the market town service centre will experience much more of the impacts. Will CIL for such cases be allocated according to estimated impact-related need or simply on a “home parish” basis? (One possibility would be to amend parish boundaries so that the SSGN area, if to be developed, is within Saxmundham parish).

Section 4 – Economy

(From p.59)

Policy SCLP4.1: Existing Employment Areas , Policy SCLP4.2: New Employment Development

We support these policies

Policy SCLP4.3: Expansion and Intensification of Employment Sites

We broadly support the policy, but propose that the last sentence needs to clarify that it is subject to points (a) to (e) above.

Policy SCLP4.4: Protection of Employment Premises

We are not presently convinced that this wording is sound in providing a strong enough protection against landowners going through the motions of marketing a property, notably in town centre environments, in order to achieve a change to a non-commercial use that will weaken the economic strength of the centre.

Policy SCLP4.5: Economic Development in Rural Areas , Policy SCLP4.6: Conversion and Replacement of Rural Buildings for Employment Use , Policy SCLP4.7: Farm Diversification

We support these policies.

Town Centres and Retail (page 70 on)

We broadly agree with the text in paragraphs 4.44 to 4.60.

Policy SCLP4.8: New Retail and Commercial Leisure Development ; Policy SCLP4.9: Development in Town Centres

We broadly support these policies, and the supporting commentary text.

Town Centre Environments

We support the comments in this sub-section, e.g.

“Development should enhance and invest in historic environments and infrastructure including public seating, arts and cultural facilities. This will help promote community interaction and healthy lifestyles. Development in the Town Centre should also provide enhancements for urban biodiversity where possible.”

We also support the point that “There are particular opportunities to enhance pedestrian connectivity”, and underline that the example for Saxmundham (between railway and town centre) is not the only area that we are considering, as the High Street may require greater priority and connectivity for pedestrians and cyclists.

Policy SCLP4.10: Town Centre Environments (page 77)

We support the policy as expressed:

“Development will encourage people to spend more time, enjoy and participate in town centres. It will do this by:

- a) Supporting opportunities for social interaction;
- b) Ensuring safe pedestrian access to link up with and enhancing existing pavements, pedestrian spaces, routes and focal points;
- c) Improving access for cyclists, people with limited mobility and people with other disabilities;
- d) Enabling physical linkages so that pedestrians can move easily and safely between parts of the town centre; and
- e) Providing environmental improvements that make the most of historic environments and heritage features.”

However, the next paragraph reference to “shared space” is unclearly drafted as to its scope (it is an issue under consideration and may have an impact on some vehicular movements:

“The expansion of Shared Space and Dementia Friendly areas will be supported where proposals maintain active town centre frontages without compromising highway access, vehicular and pedestrian movements.”

We are planning to examine in the coming months a range of options to enhance the attractiveness and viability of Saxmundham Town Centre, and several of these may impact on vehicle movements. We believe that market towns today need support from the planning framework for innovative local policies for town centres which affect the balance of priority between the motor vehicle and other highway users.

Section 4 – Housing

Housing Mix (page 91)

We note the proposed percentage split between 1 to 4+ bedrooms.

Policy SCLP5.10: Affordable Housing on Residential Developments (page 98)

We note that under this policy, proposals for residential development of ten units or more will be expected to make provision for 1 in 3 units to be affordable dwellings, and to be made available to meet an identified local need. Proposals which provide a higher amount of affordable housing than that set out above will also be permitted. Of these affordable dwellings, 50% should be for affordable rent / social rent, 25% should be for shared ownership and 25% should be for discounted home ownership.

Garden Neighbourhoods should, according to the draft Plan, be based on the Garden City principles set out in the glossary, which include (as already noted) that a majority of housing should be affordable.

We therefore propose an additional sentence in order to make this policy sound and effective:

“Proposals for residential development within designated Garden Neighbourhoods will however be expected to make provision for 1 in 2 units to be affordable dwellings, and to be made available to meet identified local needs.

We do not have specific comments to make here on other draft Housing policies in this section.

Section 6 – Tourism (from page 109)

We broadly support the policies in this section. The possible impact of the major energy-related developments on the east Suffolk tourism industry and policies should however be more taken into account. The impacts on tourism will be (a) over the construction period, and (b) some permanent ones.

Section 7 – Transport (from page 120)

Policy SCLP7.1: Sustainable Transport

We broadly support the policies set out here. However, the section is unsound in giving insufficient prominence to public transport. The current text says:

“It will improve public transport in the rural areas of the District”

We propose it should say:

“It will improve or ensure the provision of public transport in the rural areas of the District, including its market towns. For larger developments including Garden Neighbourhoods, such provision should include effective local town bus or similar services connecting the new residential neighbourhood to the town centre and other key locations.”

Policy SCLP7.2: Parking Proposals and Standards

We broadly support this policy.

Section 8 - Community Facilities and Assets (from page 126)

We broadly support the policies in this section, in relation to Community assets, open spaces, allotments, and digital infrastructure. We consider that it is slightly curious to place “digital infrastructure” in this section, when it also has such a major impact on the local economy and other policy areas. This section could be further strengthened given the poor network coverage of large parts of our district’s area.

Sections 9 and 10 – Climate Change and Natural Environment (from page 134)

We broadly support the policies in these sections. We reserve our position on whether the policies Policy SCLP10.4: Landscape Character and Policy SCLP10.5: Settlement Coalescence require further strengthening to preclude the risk of damaging development, including within Garden Neighbourhood masterplan frameworks. We note that “Neighbourhood Plans may include local policies related to protecting and enhancing landscape character and protecting and enhancing tranquillity and dark skies” and wish to clarify how this works in the context of SSGN master-planning.

Section 11 - Built and Historic Environment

Policy SCLP11.1: Design Quality – page 170

We broadly support the policy here. We would however propose that, to address the specific issue of Garden Neighbourhood, a further point be included along these lines:

“In relation to Garden Neighbourhoods, development should, while meeting the above criteria, ensure that overall it provides appropriate buildings and built environment that are of the highest design standards, energy and environmental efficiency, and use innovative, contemporary design to contribute to the definition of a distinctive neighbourhood identity.”

Saxmundham has an important conservation area, and a fair number of listed buildings, so the policies here are of importance to the town. We broadly support the policies set out in Policy SCLP11.4: Listed Buildings and Policy SCLP11.5: Conservation Areas.

The Area Specific Strategy for Saxmundham

Neighbourhood Plans (page 187)

Before turning to the Saxmundham specific section, we wish to comment on and contest the wording of paragraph 12.9:

“In instances where growth in a community is fundamental to the strategy of the Local Plan, it is appropriate for this to be planned through the Local Plan as a strategic policy. In such cases however, Neighbourhood Plans may add value through creating locally specific policies on other topics. This applies to Saxmundham where the Local Plan allocates land for the development of a new Garden Neighbourhood to the south of Saxmundham.”

For other towns and villages, it is accepted that the NP can allocate housing, within the defined numbers allocated, to specific sites. There is absolutely no logical reason why this should not apply to Saxmundham. No reason is given in this paragraph – it is simply an unjustified assertion. Instead, we are given a top-down instruction as to where *all* of the new housing should be located, without adequate justification in this draft Plan as to the merits or soundness of the SCDC preferred site over or compared to other available sites. This is the opposite of good localism policy, and the opposite of good practice.

Strategy for Saxmundham (from page 270)

We agree with the background context for Saxmundham set out in paragraphs 12.278 to 12.281.

Policy SCLP12.28: Strategy for Saxmundham

We broadly agree with the points set out here:

The strategy for Saxmundham is to:

- a) Enhance the vitality and vibrancy of the town centre, including through protecting and enhancing the historic core of the town and the railway station;
- b) Utilise opportunities related to the presence of the railway and the proximity to the A12;
- c) Diversify and expand employment opportunities;
- d) Enhance pedestrian and cycle connectivity around and beyond the town, particularly to the town centre and the railway station;
- e) Promote quality of life including through enhancements to networks of green infrastructure; and
- f) Increase the provision of housing and affordable housing, and providing greater choice in the mix of housing available;
- g) Provide for a safe and inclusive community; and
- h) Protect and enhance the natural environment.

However, we believe that – for planning soundness purposes - one of the challenges facing the town centre, which is not reflected adequately, is to ensure that pedestrians and non-motor vehicles have greater priority in using the town centre and highway. This in particular needs to include the High Street as well as the road link to the station. We would be willing to discuss how best to formulate this.

In addition, **we propose an additional point to do with the impact of Sizewell C and other energy infrastructure developments:**

Ensure that the town is able to benefit from the development of Sizewell C and other major energy infrastructure developments in the area, and that mitigation measures are implemented to protect the town and community from adverse impacts and disturbance, in particular during the construction phases.

Again, this is in our view an essential element in having an overall strategy that is sound and effective.

The last sentence of the Strategy states:

“The creation of the South Saxmundham Garden Neighbourhood will provide new opportunities for housing, employment and community facilities, focused around the principles of an inclusive community and integration with Saxmundham and the surrounding countryside through enhancing green infrastructure networks.”

For reasons set out below, we remain presently unconvinced that the overall proposal for the South Saxmundham Garden Neighbourhood (SSGN) is sound in planning terms, and therefore do not at

this point endorse this part of the Strategy. If the SSGN is in due course deemed sound with an acceptable masterplan, we have no particular objection to the wording here in SCLP12.28.

Background and Context – page 272

We question the accuracy of paragraph 12.283:

The South Saxmundham Garden Neighbourhood encompasses 66.6ha, development of which is expected to provide an education led scheme of approximately 800 dwellings, community facilities and employment land.

For reasons explained in our previous response, we do not agree that this is an “education-led scheme” since at present there is no shortage of places in the primary or secondary school local sectors. The primary school proposal is a consequence of, not a “lead factor” for, the scale of new development for the town.

We also query the size of the proposed site. According to information from the SHELAA, the size of the component sites put forward (now combined into the SSGN area) is as follows:

1012 (The Layers)	10 ha (this claims to be the figure for area of land on both sides of B1121 but we have assumed that it must be only for land to the west of the B1121 as the full site then proposed is certainly larger)
717 (between Layers and railway)	9.4 ha
714 (west of rail, to A12)	27 ha
716 (west of A12)	16 ha

This would make a total of 62.4 ha. However, site 716 was much larger as put forward than the site now proposed west of the A12 for employment purposes, so we estimate that the site is around 54 ha. (i.e. the part of 716 now propose din the SSGN is around half the earlier total).

If we are wrong, and the figure of 66.6 ha is right, we would be grateful to learn how the present figure of is calculated in the light of these earlier numbers.

Masterplan approach – page 272

The present text states:

12.284 It is essential that this Local Plan retains these principles and to do this there is an opportunity to take a master plan approach, informed by public engagement and multiple land owner collaboration, to deliver an education and employment led sustainable garden neighbourhood as an extension to the existing built up area, including land within the parish of Benhall. Landowner collaboration and partnership working with a range of stakeholders such as Suffolk County Council, Benhall Parish Council, Saxmundham Town Council and community groups will inform a master plan for the garden neighbourhood covering the whole site as part of a future planning application. A master plan approach covering the whole site will be used to inform individual planning applications for parcels of land as they come forward over the plan period.

We remain unconvinced at this point that this approach and the proposal for SSGN – at least on the scale envisaged - represent a sound basis for development. Assuming that the overall allocation of

800 'new' dwellings to Saxmundham is well-based, there is nothing in the argumentation (which is lacking) or in the principles referred to, which leads to or requires the conclusion that all of the development should be in the single location of the SSGN. The case is based on mere assertion, not on planning grounds that evaluate alternatives fairly and equally. The SSGN is an a priori assumption, based on we know not what grounds or interests, not a reasoned conclusion.

It may yet be the case that the SSGN represents a better solution than any other, but if so that case is yet to be made by SCDC. For our part, we have contended and still contend that a split site solution is likely to lead to a better and sounder planning solution. Nothing in the documentation to date has shown that we are wrong in this.

Second point – we do not object to the inclusion of provision for education and employment, but it is wrong to state that it is “to deliver an education and employment led sustainable garden neighbourhood”. The driver is the decision to create 800 housing units. We support the provision of land for future employment purposes, especially if it can be related to the industries and technologies in the energy sector, which are likely to play a prominent role in our area’s future. But the site is not “led” by this and a Garden Neighbourhood is not a logical and necessary consequence of employment land designation.

Paragraphs 12.285 to 12.290 – page 273-4

We welcome the fact that this latest draft Plan recognizes that the land to the immediate west of the B1121, The Layers, should not be built on. This was evident to us from the outset, and shows the weak evidential base for the whole SSGN scheme in its origins:

“ Consultation responses have further expressed the sensitivity of The Layers to development, including the open area to the west of the B1121. A Heritage Impact Assessment has been undertaken to assess the sensitivity of the heritage surrounding the site to development, and this has highlighted the open area in the east of the site, in particular the area between the B1121 and the tree belt, as being particularly sensitive to built development. The Heritage Impact Assessment advises that built development in this part of the site should be avoided.

We not only concur fully with this conclusion, but consider that it is a fundamental point that needs to be strengthened further in the policy statement for the SSGN if it is to become sound and acceptable.

Paragraph 12.290 however only goes part way to achieving that result. It says:

“The indicative masterplan provides an indication of how the principles outlined above could be incorporated within the Garden Neighbourhood. The masterplan shows that the area to the east of the railway is expected to be characterised by the provision of informal and formal open space whilst the area to the west of the railway is expected to provide the focus for mixed use development linked to employment uses to the west of the A12.”

This is a very weak formulation. It does not state, as it clearly should in our contention, that development on The Layers is not acceptable, on strong planning grounds. It uses the language of “could” and “expected”. It means that the indicative masterplan shown at page 277 which has only

open space on The Layers and other east of railway sites “could” be the subject of major proposed changes by developers downstream, contesting the importance of the unless the SSGN principles are drawn tightly and properly at the outset and clearly integrated into the policy statement.

The “indicative” masterplan:



South Saxmundham Garden Neighbourhood – Indicative draft masterplan

Note: indicative draft masterplan assumes new primary school within the residential / mixed use areas.

Moreover, the blue plan on page 272 shows the whole site – except for the employment land but including The Layers – as “mixed use” which adds to our concerns.

Creating a community – page 274

We have not objected to the development in the area of a new primary school, and especially (as there is current under-provision) of early years services.. There may be practical advantages, if it is to be provided in the area to the west of the railway, to locate it close to the Free School to enable sharing of some facilities, if agreement can be reached.

But paragraph 12.292 once again goes well beyond any logical conclusion:

“To support the delivery of these requirements, residential development of approximately 800 dwellings will be required in this location. The dwellings will generate the need for primary school and early years provision but can also help facilitate additional provision of infrastructure required.”

This argues that the town needs to grow by 50% in this specific location simply in order to feed the primary school. This is a reversal of the legal position, which requires the LEA to provide schools

needed for the area – not to provide an area and population that meets the needs of the school. And not only that, but must *all be in the same location*. This is another false argument. The school might be built on another site, e.g. up Church Hill to the east. It would then serve the growth in population from other housing in that area. Or assuming that say 550 dwellings were built close to the school in the area between rail and A12, and 250 up Church Hill to the east (part of site 435), the growth in population would be the same. The capacity of the town’s primary schools (in total) remains the same.

Paragraph 12.293: No specific comment, save to note the absence of reference to affordable housing. The key principles for Garden Cities and Neighbourhoods, set out in the glossary, include that a majority of housing should be “affordable” – and in our view, much of it need to be social housing. This needs to be rectified in the policy statement.

Paragraph 12.294: We agree in regard to the mix of types and sizes of housing. We are not against some higher density, but are not persuaded that the overall densities for housing across (what was) site 714 are consistent with a successful Garden Neighbourhood.

Site 714, according to the December 2018 SHELAA, had an “estimated dwellings yield” of 495. This is far short of the 800 now proposed for the site, which also has to be the site of the school, community hub and other mixed uses, provide the estate road and parking and a significant junction to the A12. To conclude, we are not presently persuaded that the proposal for the SSGN is based on sound or deliverable planning grounds, at least with the scale of housing development currently proposed here.

Paragraph 12.295: Community hub - noted

Paragraph 12.296: We support in principle the provision of employment land to the west of the A12, in order (we would hope) that the town can become a hub, using its location ‘node’ advantage, for employment related to the growing energy sectors, as well as its local service centre function. We note the phrasing here, which indicates that the SSGN is in no way “employment-led” as was claimed earlier:

“In order to provide a further mix of uses within the master plan, the Local Plan will require the provision of employment land to the west of the A12”.

Integration and connectivity – page 275

Paragraph 12.298: We note the statement that:

An important aspect of any master plan development of this scale is to ensure that the relationship between the existing communities and the new development is seamless and connections between can be easily navigated through a choice of walking, cycling and vehicular routes.

We agree that the SSGN, if it is to take place, needs excellent and attractive pedestrian and cycle links, into the town centre, and out to Benhall. We agree also with the need for “sustainable transport” into and across the town; hopefully the station operator will co-operate in this regard as envisaged despite their delays which prior to the station fire, and whose interest in the visitor experience has to date proved modest in the extreme.

Paragraph 12.300 correctly states that

“Vehicular access is expected to be from the A12. The creation of a new access point onto the existing road network will ensure that the new community is served by appropriate vehicular access. The access point will also serve the employment area to the west of the A12.”

However, this fails to address the seriousness of this traffic issue. For a development which the SCDC proposes should have 800 dwellings plus other uses, there is to be a single vehicular access point. We doubt if this is good practice or sound on planning grounds. The text here does not, as is surely fundamentally necessary, require that this must involve inter alia a roundabout. Recall that if EDF use a road strategy for most of their construction work, the A12 will for almost the whole of the Plan period be constantly used by construction lorries. Moreover, if residents of the SSGN wish to shop in the town’s supermarkets (for example) using a car, their quickest route will be to turn right across the A12 at the estate exit road, then very shortly after, turn right again across the traffic into Rendham Road. Existing public bus services along the A12 will also need good quality, safe access into and out of the SSGN site.

We have seen the draft ‘masterplan’ suggested in September by Pigeons on behalf of the landowners to the west of the railway line. Their transport expert made the extraordinary claim that the development of 800 units on the west site would generate no additional town centre traffic, at (the occasionally full) Chantry Road crossroads/lights. This is fantasy. Since past planning wisdom placed two supermarkets opposite each other in the town centre without making provision for the junction, it is obvious that as the town grows, wherever the housing is situated, the growth in traffic will be similar since the propensity to visit the supermarkets by car is likely to be constant. We do not accept the logic or the modelling used by SCDC’s own transport consultants, insofar as they claim to estimate future impacts on a specific set of traffic lights.

One interesting possibility raised in Pigeon’s response to SCDC last September was that of a regular town bus service, which could link this new SSGN estate to the town centre, and also via other major housing zones with a well-planned route. We believe this is the only sensible way of diminishing car visits from the estate to the centre. This service would of course need to be funded to be viable, and a substantial developer contribution would be essential. There will also need to be a school transport service for pupils for the new school (assuming built there). These are required on ‘soundness’ grounds.

Paragraph 12.301 states that

“the master plan approach provides the opportunity to create new community spaces and facilities which can serve the new community but also support the existing facilities in nearby settlements, alongside contributions to help improve and enhance existing facilities in Saxmundham. The need for community facilities and spaces such as play areas, meeting places, sports provision, medical facilities or police facilities will be informed by public engagement in the master plan process to ensure that concerns raised in respect of provision through the consultation responses are taken into account.”

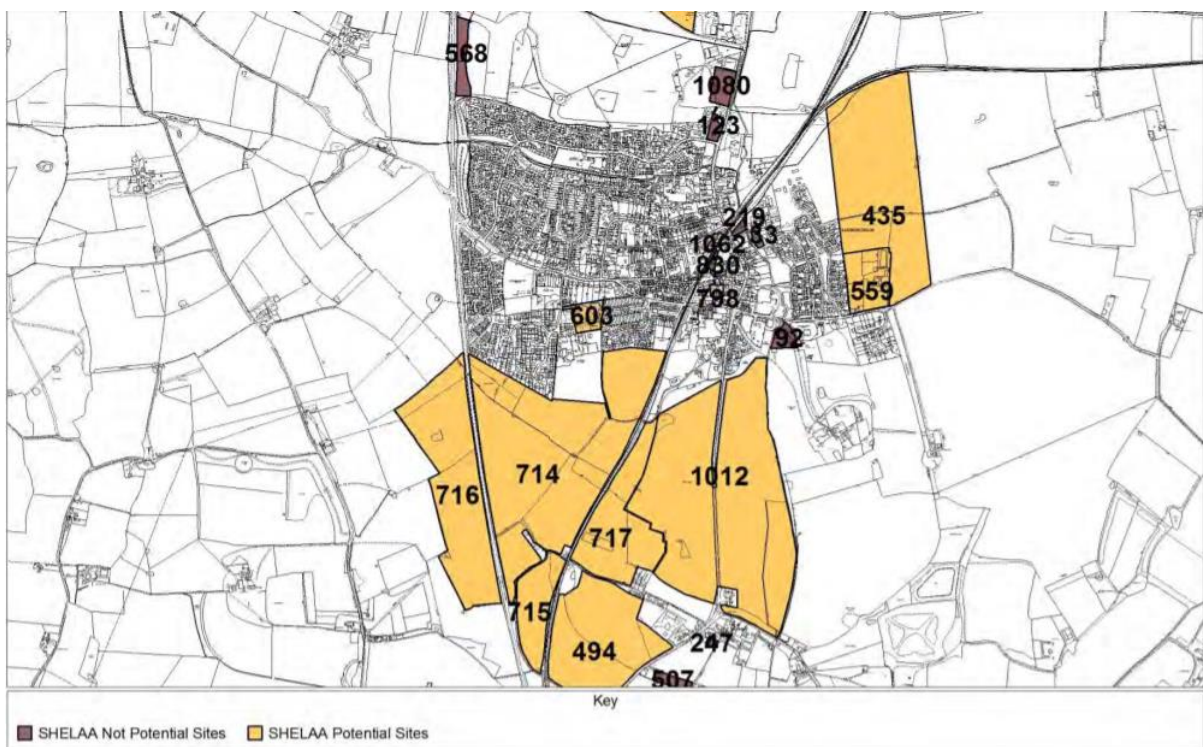
We agree that such an “opportunity” might arise, but are sure that – given the list of financial contributions from the developers set out in the following paragraphs (12.302 to 12.308 and 312) for

various statutory agencies, there is a major risk that the community of Saxmundham will lose out once more in their legitimate expectation of community benefits. Their concerns will be “taken into account”, but may also be discounted.

Policy SCLP12.29: South Saxmundham Garden Neighbourhood

We do not feel able to support this policy, as it presently stands, as being sound in planning terms or in the best long-term interests of the town and its community. The SCLP aspirations could be more effectively delivered through alternative approaches, notably a reduction in the volume of housing units to the south, and a commensurate increase in housing on part of site 435, and on site 559, to the east of town up Church Hill. We have argued for a total new allocation closer to 600 than 800, which we consider would be far more appropriate in planning terms. But if the designation is for 800, we believe it would be best delivered by placing around 500 to 550 of these, plus provision for other uses, on site 714, with the residue on sites 559 and 435.

This plan below merely shows the sites put forward by landowners and developers for development – it is here to show the site numbers and is not part of the Local Plan:



If it is to proceed we propose to delete the reference to an education led development, for reasons already stated. We have also asked for the 66.6 ha estimate to be verified, having regard to the SHELAA individual site area statistics.

On the individual points listed in SCLP12.29, we are in agreement with most, but are concerned about some.

Point (j) is of concern:

“Design and development of the site which is sympathetic to the south entrance of Saxmundham, the Conservation Area and heritage assets, and views of the sensitive landscape and heritage setting to the east, as informed by a heritage impact assessment”

The indicative master plan rightly contains no housing or other building development on the east side of the railway. Yet the reference to “design and development of the site which is sympathetic to the south entrance of Saxmundham” appears to imply that there will be such development. This is not acceptable in planning or wider policy terms.

We propose that all housing or other building development to the east of the railway be excluded – this whole area should be seen as providing open space, and including a public heritage park, to serve both the community of the SSGN, and also the wider Saxmundham community, for whom the access to countryside to the south is presently an important element in recreation, health and well-being (and with no other nearby alternatives). The case for excluding The Layers is made strongly via the heritage assessment, and overwhelmingly supported by the community in their responses to the first draft. The rest of the land to the east of the railway (old site 717) has no vehicular access other than via Kiln Lane which is narrow and quite inappropriate for more than a handful of new dwellings.

At point (o), the text needs strengthening to require the new vehicular access point from and to the A12 to be at minimum a full roundabout junction, with specific reference to safe access for cyclists and pedestrians to cross to the employment land opposite.

Point (s) refers to

“Approximately 800 dwellings of a range of types, sizes and tenures including housing to meet the needs of older people, younger and vulnerable people, and provision of self-build plots, including affordable housing on site”. This should specify clearly that all housing will be to the west of the railway, given that there will be no motor vehicular access across the railway.

We also propose as essential a condition that appropriate noise-masking protections be put in place. The site has constant noise from traffic on the A12, which is more intense in winter time when the leaves have gone. With potential large volumes of EDF construction lorries on the road for 10 to 15 years, this is likely to become much worse.

We underline again that the site is not served by any public transport, which risks creating social isolation, and is in breach of the Garden City principles.

We have already raised the issue of densities required to achieve 800 dwellings on this site. We believe the burden of proof that this is possible within the framework of a Garden Neighbourhood has not been discharged by SCDC as the proposer. The site certainly has potential for a significant housing and related development.

No strong reasons have been put forward as to why development on Sites 559 and part 435 should not take a significant part of the total allocation. We understand the argument not to extend the current east entrance “line” marked by a row of trees, but there is room in principle for development of at least 200 to 250 dwellings on the two sites without breaching the existing “line”. These would be better linked to the town, and closer to its facilities, than dwellings at the southern end of the SSGN. The road transport objection (Chantry Road lights) applies, if at all, just as much to

all development being in the SSGN, since the number of households going to the supermarkets etc. in town is unlikely to differ materially.

We share the planning authority's position that potentially, the designation of The Layers for open space could and should lead to its improvement in terms of heritage, landscape, ecology etc. As stated above, a public open space area or park with well-designed indicators of the town's and the site's heritage, and e.g. with recreational equipment to promote the "healthy living" focus, would help to make the overall concept work in practice – which is not easy given the fact of separation due to the railway.

Conclusion: If our key concerns on the SSGN can be satisfactorily addressed, we are willing to re-assess our position. But for the present, we consider that the SCDC has not established the soundness of the policy, in its present form, in relation to the South Saxmundham Garden Neighbourhood, and has not put in place adequate provisions or safeguards to enable it to succeed in practice.

Policy SCLP12.30: Land North-East of Street Farm, Saxmundham

This is a "pipeline" development. We have no specific comments to make on the policy statement.