

Saxmundham Town Council

(also for Saxmundham Neighbourhood Plan Steering Group)

Written Hearing Statement on Matter 3

2nd August 2019

Matter 3: Area Specific Strategies - Development Allocations

Issue: Are the proposed Area Specific Strategies, allocations and policies justified, effective and consistent with national policy?

General Questions relevant to all proposed site allocations

Is each site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential constraints? Are there any significant factors that indicate any of the sites should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?

1. We contend that there are “significant factors” that indicate that the South Saxmundham Garden Neighbourhood site is unsound as proposed and should not be allocated. These include:

(a) The problem of creating an integrated coherent single “Garden Neighbourhood” and community of this scale on land (i) bordering on a major highway, (ii) divided by a railway with crossings only at either end, one being via a level crossing, (iii) with the housing element poorly linked to the town or its station, (iv) with the built elements becoming more dense than a garden community would expect, and (v) with the residential element being mainly placed in a different parish without regard to administrative and financial consequences;

(b) One of the key landowners (Hopkins Homes) has stated explicitly that the land proposed in the draft Plan as SANG (between railway and B1121) is no longer available for this Plan. **There is therefore at present (so far as we are aware) no site available for the proposed SSGN development.** See p.1388 of Document A7 on the Examination website:

“2.4 Fundamentally, Hopkins Homes and the landowner are only interested in developing their site for housing. There is an option on the land until at least 2027. The landowner will not release the site for its use as Suitable Alternative Natural Greenspace (SANG) as proposed as this would result in the land being sold at only a nominal increase in land value. The Council has been made aware of Hopkins Homes’ position in this regard but has seemingly discounted the concerns raised.”

(c) The road access issues are wholly inadequately dealt with, including to the proposed primary school site. All motor vehicle movements would be on to or from the A12, with the shortest road access to the town centre being via two right turns across the traffic. The A12 will be, for over a decade, the principal route for EDF’s construction-related traffic along this road for Sizewell C (if to be built);

(d) related to this, the employment land, which is an integral part of the “garden neighbourhood” concept, is across the A12 from the housing with no safe access for pedestrians and cyclists shown;

(e) very great risks that the proposed primary school – which is not required to meet the town’s current needs, but only for a future development of scale - will not prove developable or sustainable in relation to this SSGN site, since it depends inter alia on pupil numbers in reality matching the over-simplified planning assumptions used to date. Pupil numbers depend very much on the building and tenure mixes, which at this stage is not clear to us. No likely school operator has been identified to date;

(f) There is a severe risk that the allocation of this site, on the basis proposed, could lead to outcomes that differ so materially from the appearance given by the draft Plan as to render it fundamentally misleading. In particular, this relates to the land east of the railway. The text of the Plan says:

“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”.

Policy SCLP12.29 however does not give any clarity on this:

“j) 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..”

We contend that this all involves a non-compliance in every respect with NPPF paragraph 16:

“Plans should... d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals..”

(g) The scale of development proposed for Saxmundham is greater than justified by the residual need requirement, a fortiori using the 2014 baseline, and there are other suitable sites (omission sites) e.g. 435 which should be fairly and equally considered (as alternative or in addition to part of South Saxmundham site) if/when the Council re-consults as we argue is necessary. These can better provide for the appropriate scale of housing and related uses including primary school / early years.

(h) A Garden Neighbourhood should have, amongst other things, community support. (See the government’s “prospectus” paper, “Garden Communities”, 2018).

2. Because of location-related problems and the top-down approach, this is not the case in relation to the Plan proposals for south Saxmundham. We have referred in our Statement on Matters 1 and 2 to our recent Household Survey questionnaire which show low support.

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Policy SCLP12.28: Strategy for Saxmundham

3.34 Is the ‘and’ at the end of point e) necessary to make the Policy effective?

3. We think not. It appears to be a left-over from the previous draft, for which this was the penultimate item, and to which further bullet points have been added in this Final draft. It may however be seen as symptomatic of a general over-hasty approach when it comes to the proposals for Saxmundham.

Policy SCLP12.29: South Saxmundham Garden Neighbourhood

3.35 Is the allocation of land for approximately 800 dwellings achievable within the area indicated for housing between the A12 road and railway line on the indicative draft masterplan?

4. The site allocated for 800 dwellings in Policy SCLP12.29 extends to 26.90 ha. and was previously identified in Suffolk Coastal Strategic Housing and Economic Land Availability Assessment (December 2018) as capable of yielding 495 dwellings. The current proposal for 800 dwellings would result in a density of 30 dwellings/hectare if the entire site was used for housing. However, the policy specifies this as a garden neighbourhood and therefore a mixed use site. Once the other specified uses are taken into account, the area available solely for housing is much reduced. The proposal includes 2.2ha for a new school, 0.13ha for early years provision and an unspecified area for a community hub and generous landscaping. In addition, Park Farm Covert (approximately 2.2.ha.) is retained as woodland. Thus, the actual area available for housing is closer to 22.25ha, resulting in a density of around 36 dwellings/ha. This is higher than the 30 dwellings/ha which SCDC deems reasonable for market towns. The densities of garden neighbourhoods are, by their very nature and criteria, expected to be somewhat lower than ordinary housing estates.

5. The number of dwellings proposed could be physically (quite densely) achieved on this site, but only with the sacrifice of garden neighbourhood principles and space standards, and may not (given smaller dwelling types and size) “generate” the number of primary school children foreseen . As proposed, the number of dwellings and densities would be inappropriate for the fringes of a rural market town, incompatible with the character of Saxmundham and could not constitute a true ‘garden community’ development.

3.36 Is the indication of the area to the east of the A12 road for mixed use development justified given it would be used to provide open space?

6. We have taken this question to mean “to the east of the railway” rather than A12 road since the land immediately to the east of the A12 is the scene of the main proposed mixed use built development.

7. We contend that it is not justified, since in ordinary understanding, mixed use development involves buildings (and associated built environment) to be used for different purposes - housing, employment, and commercial or non-commercial use etc. As far as we are aware, there is no official definition. The “Designing Buildings Wiki” website offers this

https://www.designingbuildings.co.uk/wiki/Mixed_use_development:

“The term ‘mixed use development’ refers to development projects that comprise a mixture of land uses, or more than just a single use. In terms of planning permissions, mixed use refers to land or buildings used for different uses which fall into more than one use class.”

8. We conclude that it is wrong (unsound) to classify land to the east of the railway simply as mixed use, since this is not in accordance with the draft Plan’s explanatory text. Since the employment land is separately categorised as “employment” not “mixed use”, we consider this strengthens the case for designating the eastern land as “open space”.

9. If it continues to be labelled “mixed use”, this area should however be clearly distinguished from other parts of the site, e.g. by calling it “Mixed use – open space zone”

3.37 In the context of Policy SCLP3.3: Settlement Boundaries, is the definition of the settlement boundary to include land which would be solely used for informal/open space justified? Why is the proposed employment land outside of the settlement boundary?

10. In our view, the proposed settlement boundary for Saxmundham is wrong and not justified. The land forming part of the proposed Garden Neighbourhood to the east of the railway is proposed to be used for informal/open space and/or SANG, and is not (as per SCLP3.3) “New residential, employment and town centre development” which “will not be permitted in the Countryside except where specific policies in this Local Plan or Neighbourhood Plans indicate otherwise”. We would recommend (but this refers to omitted sites) that the site boundary be extended to the east, north of Church Hill (Site 435).

11. There is a broader problem with designation of the whole SSGN site as “mixed use”, see above.

12. We have no idea why the employment land to the west of the A12 is outside the settlement boundary. We are not sure if this matters, since it would be defined as Countryside but where the Local Plan policy indicates that it can be developed for employment purposes. There has always till now been a presumption against development west of the A12, so it may possibly be better to leave it as an anomaly if the SSGN is to proceed, despite our contention as to its unsoundness.

3.38 Would the provision of the SANG to the east of the railway be effective given the limited crossing points of the railway? Is the extent of land indicated for informal/formal open space to the east of the railway justified?

13. The provision of the SANG to the east of the railway would (if well implemented) be partly but not wholly effective, assuming that the cost of its creation and maintenance is clearly and sustainably allocated, which is not the case to date. But if the SSGN proposal is to proceed as per the Plan, it – or an equivalent high quality open space - is an essential if imperfect element. There cannot be a Garden Neighbourhood without high quality open space, and unless a developer or landowner is willing to finance another crossing of the railway, the site constraints will apply. The Council’s HRA sets out the basic principles for SANGs including

“Seeking to provide a minimum of 8ha per 1000 residents, but ensuring that the proposed size is justified in light of local circumstances... Resident numbers are usually calculated on the basis of 2.4 residents per dwelling, unless local information suggests otherwise.”

14. This would imply about 15 hectares, which is not far from the size of the land east of the railway. (Site 1012 in SHELAA is given as 10 ha, which seems too little for this site shown as on both sides of the B1121, plus site 717 at 9.4ha). It will also be able to serve the southern part of the town’s population, for which this land already offers the only (and well-used) footpaths to the south, via a circular set of footpaths, unless you boldly try to cross the A12.

3.39 Would the Policy give rise to coalescence with Benhall village?

15. Yes. Much of the proposed SSGN development would actually be within the parish of Benhall, including most housing, but the built village of Benhall, by common usage, starts in the north at the Kiln Lane part of the settlement. The gap between South Entrance and Kiln Lane/Bigsby’s Corner has long been seen as a significant (and valued) separation between settlements. The proposed SSGN however now abuts Kiln Lane. The southern edge of the mixed use site and settlement boundary has moved significantly further south in the Final Draft Local Plan, compared to the first draft.

3.40 Would the Policy be effective in achieving the provision of required education facilities? Is it justified to include early years provision within both criteria a) and b)?

16. We have not seen any evidence to justify early years provision in both criteria (a) and (b).

17. The town's population, including pipeline developments, does not have a shortage of primary school places, and has significant capacity for secondary provision at the Free School.

18. We consider that the numbers of primary school children to be "generated" by a development depends greatly on the size and type of dwellings. Denser smaller dwellings generate small numbers on average. We generally support Chris Edwards' paper on this aspect. We believe that running a broad average across 800 is likely to mislead badly. We understand that looking at the existing pupil numbers generated by the current housing stock in Saxmundham, 800 new properties is likely to give rise to roughly 120 primary school pupils". But a different housing mix of mainly larger dwellings in a new development could provide a much greater number.

3.41 Are there any factors which would mean that the site is not 'deliverable' or 'developable' as per the definitions in the Framework?

19. One of the major landowner/developers, Hopkins Homes, has indicated that their land will not be made available for the proposed draft Plan purposes (SANG, open space). This means that the site is not deliverable, within the NPPF definition – "sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years."

3.42 Is it justified that the site is accessed via a single vehicular access?

20. It is not justified.

21. The draft local plan shows that the site should be accessed via a single access point to the A12 Saxmundham bypass. The A12 at this point is a single carriageway principal road linking Ipswich to Lowestoft and is subject to a speed limit of 60 mph.

22. The Plan includes a strategic sketch diagram showing a single crossroads type junction with the western arm leading into an employment area. It is not clear whether a new roundabout type junction is envisaged. In our view, a roundabout with pedestrian and cyclist crossing to the employment land is a necessity if the SSGN goes ahead – but this has not been costed nor responsibility allocated.

23. Policy advice on access to new developments in Suffolk is set out in the 'Suffolk Design Guide for Residential areas'. This is a collaborative policy document involving the County Council as highway authority and all Suffolk planning authorities. We understand it was formally adopted as policy guidance by Suffolk County Council and all Suffolk LPAs including the former Suffolk Coastal and Waveney Councils. Paragraph 3.3.9 (page 16) deals specifically with access requirements to new developments:

"3.3.9. From the point of view of safety and the need to consider access in emergencies, not more than 150 dwellings will normally be served by a single means of access."

24. The preceding paragraph 3.3.8 deals with Major Access Roads.

"3.3.8 For Major Access Roads serving more than 150 and up to 300 dwellings:

a) Two points of access should be provided to the part of the site being served and the road layout conveniently connect those points of access...”

25. While the Design Guide is formal guidance for housebuilders / developers, the Council has given no justification for departing from it, for a development of this proposed scale, nor indeed any recognition of the issues including access in emergencies.

26. The local plan proposes some 800 dwellings be constructed on the site. Adopted policy advice recommends a site of this magnitude would require multiple points of access in order to maintain safe and effective traffic flow. Pedestrian and cycle traffic crossing to/from the development to the employment area has been ignored, which is a potential major safety hazard.

27. We note that, in relation to site 716, the December 2018 SHELAA gives an amber marking under roads:

“Cumulative A12 impacts. Potentially significant investment to provide suitable junction layout. Assess in conjunction with adjacent sites.”

The suitability conclusion: “The site is not well related to the settlement but it is adjacent the A12 so suitable for employment use, subject to issues related to access, utilities and landscape.” Yet the Plan fails to make proposals that would provide any safe access from it to the rest of what is supposed to be one Garden Neighbourhood.

3.43 Would the Policy be effective in addressing the needs for off-site infrastructure requirements arising from the development?

28. The Policy would not be effective. One problem is the total lack of clarity or information about whether CIL would be chargeable, and if so for a fair distribution between the parishes, since the impact almost wholly falls on Saxmundham, but the housing is largely to be in the parish of Benhall.