Policy statement

Consultation in relation to South Saxmundham Garden Neighbourhood proposals

Adopted by Saxmundham Town Council, 14th December 2020

Saxmundham Town Council takes note of the consultation exercise being conducted by Pigeon Investment Management Ltd in relation to their proposals for a South Saxmundham Garden Neighbourhood. It agrees the following key points at this stage (14 December 2020), to form the basis of a more detailed response in January:

1. We recall that, in relation to the Suffolk Coastal Plan, the Town Council consistently argued that – while favouring reasonable growth of the town for the coming period - the proposal for 800 new dwellings was excessive and the location to the south was not the right one for such a large development;

2. We take note, however, that the Suffolk Coastal Local Plan was formally adopted by the Local Planning Authority (East Suffolk district council) on 23rd September 2020, i.e. less than three months ago.

3. The adopted Local Plan

(a) clearly identifies the specific site for the South Saxmundham Garden Neighbourhood, being approximately 67.8ha, and shown in policy map 53;

(b) includes only a single employment site on the west of the A12, with all other built development to be between the railway and A12, and with the whole of the land to the east of the railway, across to the B1121, being "identified for the provision of open space and Suitable Alternative Natural Greenspace (SANG), to be masterplanned and delivered as part of the garden neighbourhood";

(b) sets out the policy for the development of the whole specified site as in Policy 12.29, which includes, among many other matters, the importance to the success of this masterplan of achieving good integration of the new garden neighbourhood with the existing community of Saxmundham.

4. Given the formal adoption of the Local Plan, with its major consequences for our town, we express our commitment of principle (a) to cooperate with the developer(s) of the new neighbourhood in implementing the Local Plan in the best way, in accordance with the approved policy and on the policy site identified, and (b) to engage fully and constructively to ensure that it is both successful and well-designed in its own terms, and also contributes positively to the town's economic, social and environmental life, and (c) to ensure that an appropriate contribution is made by the developer(s) in terms of new community facilities and infrastructure that will arise due to the (around 40%) increase in population that will ensue.

5. We are extremely concerned, however, that at the very outset, the site put forward by Pigeons for the present consultation exercise differs in some fundamental and retrograde respects from the site identified and so recently approved in the Local Plan.

6. The proposed lorry park and service station have no basis in the Local Plan and are not appropriate to a Garden Neighbourhood

The site now proposed by Pigeons now includes a large new site to the west of the A12, additional to the agreed employment land, and immediately opposite the housing element, for the purpose of a lorry park and service station. This was not put forward in any previous consultation for the Local Plan, does not form part of the Plan-identified site, is not justified by any proper analysis or comparison of potential sites, and risks causing public loss of faith in the genuineness and integrity of the Local Plan formation process. We are particularly surprised that Pigeons do not point out anywhere in their consultation that their proposed site differs from the Local Plan site in this key respect.

Moreover, in addition to and to the south of the lorry park, a further site – also not in the Local Plan site - is now proposed by Pigeons for development to the west of the A12, for purposes of Sustainable drainage systems (SuDS). The Pigeon-proposed site also includes a narrow spur with SuDS basin to the south on the east side of and adjacent to the A12 – once again this is land outside the Local Plan site. These facilities should be located within the policy site.

7. The area set aside for public open space and SANG is far too small, and there is no proper plan for the whole of the site east of the railway

Our second major concern, which goes to the heart of the ability of the development to fulfill the conditions of the policy, is the fact that the area set aside for open space and SANG (Suitable Alternative Green Space) is far smaller – less than half – of the site's land identified in the Local Plan for those purposes, in particular to the east of the railway. The relatively small area proposed by Pigeons does not include The Layers, which (as a key part of the town's heritage) should become a special public open space. The site to be developed includes public footpaths currently in rural setting and much used and valued by the existing population, which will need good quality alternatives if the new development is to be acceptable and fair.

8. The site as proposed is not properly connected to or integrated with the town of Saxmundham

A third key concern – which is closely linked to the issue of public open space and the future of The Layers - is that the current proposal by Pigeons fails totally to achieve the policy requirement that the new development, and the new community, be integrated with the town. There is a near total absence of specific proposals for achieving appropriate connectivity. Apart from a single existing public footpath to South Entrance, there are no new linkages proposed, e.g. for cyclists or pedestrians. 9. We therefore consider that development should be reserved for the site and purposes identified in the Plan, and that the open space and connectivity issues should be addressed by Pigeons before further steps are taken.

10. Whilst highlighting these vital points of serious concern, we affirm our willingness to engage positively with Pigeons without delay on initial aspects of key issues including:

(a) discussion on the masterplanning issues for the development between the railway and A12, which is due to include the site for school, community/local hub, new housing, green infrastructure etc.

(b) the community and recreational facilities and infrastructure requirements both on and off-site that arise from the development and the pressures it gives rise to,

(c) the transport issues that flow from the development, including safe and attractive cycle and pedestrian routes as well as vehicle and public transport access within, into and from the development.

(d) potential future ownership and management arrangements for the public open spaces required,

(e) the application of Garden City principles to the development, in line with para. 3.27 of the Local Plan.

11. We note that masterplanning comprises several stages in major developments, from the initial outline concept (as now) to the framework stage, in which the layout and development form are set out, plus phasing, funding and delivery of social and physical infrastructure etc., and on to the detailed masterplan. Saxmundham Town Council stands willing and would wish to be properly engaged at each of these stages.