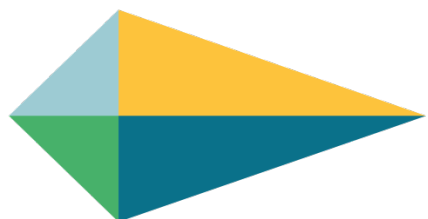


# Responses to Saxmundham Neighbourhood Plan

## Regulation 16 Publicising a Neighbourhood Plan

Publicity period: 8 July 2022 to 2 September 2022

Published 16<sup>th</sup> September 2022



**EASTSUFFOLK**  
COUNCIL

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## What is the purpose of this document?

Saxmundham Town Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the publicity period of 8<sup>th</sup> July 2022 to 2<sup>nd</sup> September 2022.

## East Suffolk Council

This is a well written and well presented neighbourhood plan. It contains many thoughtful and carefully written policies and actions responding to a wide range of topics and issues of local importance. However, East Suffolk Council (ESC) considers that there are also some areas that require further attention and modification, as set out in detailed comments from below.

The Suffolk Coastal Local Plan (the SCLP) contains a number of policies which specifically identify a role for neighbourhood plans in setting local policies. ESC supports the approach taken by the draft Neighbourhood Plan in taking these specific opportunities.

### **East Suffolk Community Governance Review**

ESC is currently undertaking a Community Governance Review (CGR) of all parishes within the district. The purpose of the CGR is to make changes to the governance arrangements for town and parish councils and parish areas. As part of this process, it has been recommended that the Saxmundham/Benhall parish boundary be altered to include the entirety of the South Saxmundham Garden Neighbourhood (SSGN), as allocated for development in the Suffolk Coastal Local Plan (the Local Plan, under policy SCLP12.29. Presently the parish boundary runs through the SSGN. The CGR draft recommendation for this boundary change has been published and can be viewed [here](#).

The current Saxmundham parish boundary is the designated Neighbourhood Plan area, as set out in the Saxmundham Neighbourhood Area Determination and Decision, available [here](#). Should the Saxmundham parish boundary be altered through the CGR it would not change the NP area, which would remain the same area as designated on 29 August 2017.

More information about the CGR, including the proposed changes to the Saxmundham parish boundary, the draft recommendations report to Full Council, the CGR terms of reference, and the CGR timetable can be viewed on the ESC website [here](#). ESC will update the examiner as and when new information becomes available on the CGR as appropriate.

### **The Neighbourhood Plan area and SSGN**

The SSGN does not fall entirely within the NP area as the NP area was designated before the adoption of the Local Plan. The consequence of this is that the NP cannot contain policies that address elements of the SSGN outside the NP area. It will therefore be important that the SSGN is accurately referenced throughout the NP, particularly within policies.

### **Status of the ‘Saxmundham Design Guidelines and Codes for the Garden Neighbourhood site and the Neighbourhood Plan area’ and ‘Saxmundham Concept Masterplan for the High Street and Garden Neighbourhood’**

The ‘Saxmundham Design Guidelines and Codes for the Garden Neighbourhood site and the Neighbourhood Plan Area’ (the Design Code) and the ‘Saxmundham Concept Masterplan for the High Street and Garden Neighbourhood’ (the Masterplan) are two of the supporting documents to the NP, as listed in paragraph 1.15 of the NP. These documents provide design related guidance to the SSGN, in addition to areas within the NP area. As the SSGN does not fall solely within the NP area, these documents therefore provide guidance that relates to land outside the NP area. The two documents have not been informed by engagement with statutory consultees and key stakeholders in a manner that could lead to changes to the documents and they do not have the design and functional foundations expected of such documents.

It is ESC’s view that wording within the NP should clearly explain the status of the proposed Masterplan and Design Code with regard to the SSGN, given that the site falls outside the NP area and the deficiencies of related to stakeholder engagement. The Masterplan covering the SSGN produced for the NP cannot afford formal masterplan weight in the delivery of the site when considered against Local Plan policy SCLP12.29. It may present a vision of what the NP would prefer but it is academic in nature and therefore it instead guides the relevant key principles established in NP policies. A similar situation applies to the Design Code where it relates to the SSGN.

In respect of the Design Code more specifically, a locally led approach to this is to be applauded and there are many aspects to these we endorse. However, as with the Masterplan, how can these be seen as suitable for a site which is not fully within the Neighbourhood Plan area? How can it interact with a developer led masterplan? Importantly, how much do these conform with, relate to, or duplicate the National Design Guide and National Model Design Code? In terms of what the NP Group desire to achieve from the NP, it is of greater merit to focus on guidelines and codes which will have the greatest influence and which aren’t duplicating national or other local guidance. Site specific codes about connectivity and Saxmundham edges could have the greatest merit and weight. Codes which require technical sign off from the Highway Authority or Lead Local Flood Authority may not be practical for a NP.

It doesn’t appear that there has been or is any scope for the two documents to be amended and improved as a result of responses the NP group received from both the Regulation 14 and 16 consultations as it is understood that Aecom’s brief was complete prior to the Regulation 14 consultation and any further work would be a new instruction. They would not be sound influence on policies and future decisions if they remain fixed and

unchangeable following consultations. The documents have not been amended since they were first drafted in July and August 2021.

### **General conformity with the strategic policies of the Suffolk Coastal Local Plan**

As with all NP policies, it will be important that they are in general conformity with Local Plan strategic whilst also not duplicating Local Plan policy criteria. Not only does duplicated policy not add value to the Development Plan, but it can also add unnecessary confusion, complexity and thereby hinder the effective assessment of planning applications by all involved, whether that be communities, applicants or case officers. Appendix M of the Local Plan sets out the strategic and non-strategic Local Plan policies.

### **Opportunity Zones**

To further explain the rationale for including the Opportunity Zones policies in the NP, it may be useful to explain that these sites are in key locations within the town and as underutilised brownfield sites represent opportunities for regeneration, which cannot be replicated on other sites in less strategic locations within the NP area.

#### **Paragraph 2.1**

Should be amended to state ‘...economic centres of East Suffolk ~~district~~’ for accuracy.

#### **Figure 15 - Policies map**

Figure 15 acts as the policies map for the NP, to which we have the following comments

- Some of the NP area is cut off from the edges of the map. While there may not be any polygons present in the areas missed from the map, this won't be clear to anyone without prior knowledge of the NP and its policies. The policies map must therefore show the entire NP area.
- The NP area needs to be identified in the key (solid blue line on map).
- A number of the policies use very similar polygons, notably the green polygons. While this makes sense when viewed on their own, taken together it can be difficult to differentiate between them. It may be useful to consider the polygon colours for each policy and how they relate to each other when viewed on the policies map.

#### **Paragraph 6.13**

The draft Suffolk Design Streets Guide has been referenced in paragraph 6.13, which is good to see. However, the Guide was adopted at Suffolk County Council (SCC) Cabinet on 26 July 2022, and as such reference to the Guide being ‘draft’ should be placed with ‘interim Suffolk Design Streets Guide’ while it has been adopted it is yet to be formally published on SCC’s

website outside of the SCC Cabinet papers. The Guide adopted at SCC Cabinet can be viewed with the SCC Cabinet Papers here at [agenda item 11 - Appendix B](#).

### **Policy SAX1: General Design Principles**

Criterion g) of policy SAX1 requires the use of “Contextually appropriate” materials. For clarification reference could also be made to these materials should be of high quality.

The final sentence of policy SAX1 refers to ‘guidance’ contained in the Opportunity Zones policies. Planning policies do not provide guidance, they set policy. Reference to guidance should be removed.

### **7. Parish wide: Local economy**

While the inclusion of policies relating to the local economy within neighbourhood plans is supported, further consideration should be given to the extent to which these policies duplicate or add value to those already contained in the Local Plan.

#### **Policy SAX2: Expansion of Existing Businesses**

Criterion c) policy SAX2 and paragraph 7.6 make reference to providing jobs for young people. This is not a planning matter and cannot be controlled through the planning system. It therefore should not be included within the policy.

Criterion c) is also supportive of the provision of ‘sustainable jobs’. It is unclear what is meant by this. If the NP group had detailed employment needs evidence as to particular job sectors, then this could be specified. However, without such evidence a preference for ‘sustainable jobs’ is neither effectively evidenced nor implementable.

### **8. Parish wide: Community infrastructure**

While the inclusion of policies relating to community facilities within the NP is supported, consideration should be given to whether policies SAX4 (Protecting valued local community facilities and amenities) and SAX5 (New community facilities) add value beyond the requirements of policy SCLP8.1 of the Local Plan.

As currently worded, policy SAX4 is more restrictive than Local Plan policy SCLP8.1 in respect of the potential situations whereby change of use of community facilities to other uses may be acceptable. SAX4 must therefore be amended to reflect these additional situations whereby change of use would be acceptable.

### **8. Parish wide: Community Infrastructure**

Much more attention should be given to the Infrastructure Priorities of the town, including the infrastructure needs acknowledged in the Local Plan in the Infrastructure Delivery Framework and in more up-to-date terms, the Infrastructure Funding Statement (not just

those delivered by the Garden Neighbourhood). Infrastructure not listed in that but of local importance should be listed and categorised as essential or desirable, therefore interacting with the expectations of the CIL Spending Strategy.

The Council's CIL Spending Strategy

(<https://www.eastsuffolk.gov.uk/assets/Planning/Community-Infrastructure-Levy/CIL-spending/Community-Infrastructure-Levy-Spending-Strategy.pdf>) contains a prioritisation framework, see section 5.2. Of particular relevance to Neighbourhood Plans this sets out:

- Essential infrastructure – these are projects that will be considered first in bids for District CIL, and the criteria include infrastructure that is ‘identified in the Neighbourhood Plan as a priority’ and where ‘it represents key infrastructure (i.e. it is classified as critical or essential within the Infrastructure Delivery Framework of the Local Plan or the Neighbourhood Plan)’
- Desirable infrastructure – these are projects that will be considered on a case by case basis and the categories include those which are identified as ‘desirable’ in Neighbourhood Plans.
- Beneficial infrastructure – these are projects which will also be considered on a case by case basis and the categories include those which have not previously been identified as critical, essential or desirable in the Local Plan or Neighbourhood Plan, but a clear link can be identified in supporting the sustainability of the Local Plan.

Infrastructure priorities are therefore expected to be categorised in plans as either critical, essential or desirable. The Infrastructure Delivery Framework in the Suffolk Coastal Local Plan defines this as follows and this provides a reasonable basis for considering infrastructure requirements in Neighbourhood Plans:

- Critical infrastructure is infrastructure that is needed to unlock development sites allocated in the Local Plan (i.e. without the infrastructure the development cannot physically take place).
- Essential infrastructure is the infrastructure that is necessary to support and mitigate development and ensures policy objectives of the Local Plan (or in this case, neighbourhood plan) are met. Development could take place without this infrastructure but its sustainability would be undermined.
- Desirable infrastructure is infrastructure that could support development in the Local Plan (or in this case, neighbourhood plan) and make it more sustainable and help deliver other place-making objectives. However, development planned in the Local Plan could take place sustainably without it.

Paragraph 1.10 of the CIL Spending Strategy states ‘Where town and parish councils have a Neighbourhood Plan made in their area, the expectation is that Neighbourhood CIL is prioritised and spent to deliver the projects identified in the Neighbourhood Plan. This may



mean that in some areas where the Neighbourhood Plan has identified health or education, or other strategic infrastructure as a priority infrastructure requirement, there will be the opportunity to collaboratively fund projects of this nature.' Section 4.1 of the CIL Spending Strategy sets out a number of criteria which are to be met in order for any application for District CIL to be considered favourably.

To assist Parish Councils identifying and evidencing infrastructure needs and priorities the Council has produced a template Parish Infrastructure Investment Plan (PIIP) (available at <https://www.eastsuffolk.gov.uk/planning/developer-contributions/community-infrastructure-levy/parish-support/>). The Council is currently reviewing ways in which Neighbourhood Plans may best be able to express and evidence their infrastructure needs and priorities in light of the CIL Spending Strategy, however in view of the advanced stage at which this NP is at it is suggested that there could be a useful role for a Parish Infrastructure Investment Plan to accompany the NP.

## **9. Transport and movement**

The NP is encouraged to make reference to the East Suffolk Cycling and Walking Strategy, which is currently proceeding through the adoption process and will be considered at ESC Cabinet on 4 October 2022 for adoption. The Strategy contains cycling and walking infrastructure recommendations for Saxmundham which are encouraged to be incorporated into NP policy. The draft Cycling and Walking Strategy is available to view here. ESC will provide a copy of the final Cycling and Walking Strategy to the examiner if considered appropriate.

### **Policies SAX6: Improving connectivity & SAX7: Public rights of way**

Given policy SAXGN1 addresses connectivity for the SSGN it's probably not necessary to include such provision in policies SAX6 or SAX7.

### **Policy SAX8: Parking provision**

Policy SAX8 should be reviewed in the context of Local Plan policy SCLP7.2 and consideration given to whether it adds value beyond the requirements of the Local Plan.

The opening sentence of SAX8 refers to "adopted parking standards of East Suffolk Council" with a footnote link to SCC's parking standards. This should be amended to refer to SCC's parking standards, as while they are referred to within Local Plan policy SCLP7.2 the standards have been prepared by SCC rather than ESC.

### **Policy SAX9: Windfall and infill development**

Consideration should be given to the need for SAX9 in light of Local Plan policy SCLP5.7. There is some duplication of policy criteria between SCLP5.7 and SAX9 as currently worded and the extent to which SAX9 adds value to SCLP5.7 is unclear.

### **Policy SAX10: Housing Mix**

As acknowledged in paragraph 10.8, no Housing Needs Assessment for Saxmundham has been produced, therefore there is no robust evidence to underpin policy SAX10. Policy SAX10 should therefore be removed and Local Plan policies SCLP5.8 and SCLP5.10 relied upon.

However, the final two sentences of SAX10 that relates to tenure blind affordable housing and avoiding the location of affordable housing in clusters on larger sites add value to policy SCLP5.10 and so could be retained, or perhaps moved into policy SAX1 (General Design Principles).

### **Policy SAX11: Historic town centre and Conservation Area**

While perhaps only a minor suggested wording change, it would be more consistent with the Planning (Listed Buildings and Conservation Areas) Act 1990 and national policy for the opening sentence of policy SAX11 to state ‘...conservation area will be preserved~~protected~~ and enhanced’.

Criterion c) could helpfully refer to policy SAX13 and the relevant key views into and out of the conservation area, if it is some of these views that are being referred to in criterion c).

### **Figure 20**

In Figure 20, The Chapel on Church Road is identified as an NDHA. It isn't clear why the icon for NDHA 1 on Figure 20 includes both the Church as well as a red line covering the spaces around the church. If the spaces around the church are intended to be included in the NDHA please include this in the red filled polygon. Alternatively, if there is a different reason for the red outlined area around the church it would be helpful if this could be clarified and added to the Figure 20 key.

### **Figures 20 and 21**

Given the potential parish boundary change through the CGR, it is suggested that any maps (such as at Figures 20 and 21) that show and refer to the current parish boundary in the key, refer instead to the NP area, which follows the current parish boundary. This would mean the maps would be accurate regardless of the outcome of the CGR.

### **Figure 23**

Policy SAX13 (Gateways, views and the landscape setting of Saxmundham) refers to four green gateways, however green gateway B isn't identified on Figure 23. Figure 23 should therefore be updated to show green gateway B at the northern entrance to Saxmundham.

#### **Policy SAX14: Protection and enhancement of natural assets**

While the intention behind policy SAX14 is supported, the policy should be reviewed in the context of Local Plan policy SCLP10.1 and the provisions of the Environment Act 2021 (particularly in respect of biodiversity net gain), and consideration given to whether it adds value beyond the requirements of the Local Plan and Environment Act 2021. Duplication of policy should be avoided. If biodiversity net gain is to be included in the policy then clear guidance on the assessment and implementation of sites' biodiversity value will be needed.

#### **Policy SAX15: Community gardens and allotments**

The aims of Policy SAX15 are supported, however careful consideration should be given to how this would be implemented. Community growing spaces created through this policy would require future management and it is unclear who is intended to own, maintain or manage these areas, or how this would be secured in the longer term.

#### **Policy SAX16: Green Spaces**

The identification of the Layers as Suitable Alternative Natural Greenspace (SANG), while understandable in light of the SSGN, is not in general conformity with SCLP12.29v) in that Local Plan policy identifies this area of land as open space and SANG, whilst also allowing for the retention of existing uses on the land where this would complement the delivery of open space and SANG as part of the SSGN. This should be reflected in SAX16.

SAX16 does not state how development proposals on identified Local Green Spaces (LGS) should be considered. It should not be assumed that because NPPF paragraph 103 states "Policies for managing development within a Local Green Space should be consistent with those for Green Belts" that it is clear how development proposals on LGS should be considered. It is for SAX16 to set the policy considerations, the NPPF simply states that considerations should be consistent with NPPF policy for the Green Belt. For clarity, development proposals in the Green Belt should only be approved in 'very special circumstances', which is the wording that has been used in other neighbourhood plans. You may also want to consider potential exceptions to a high bar test, as demonstrated at NPPF paragraph 149.

#### **Policy SAXGN1: Connecting the Garden Neighbourhood**

The detailed consideration of connectivity between the SSGN and the existing town in policy SAXGN1 is welcomed. However, the aspects of the policy that relate to 'Connections and movement within the Garden Neighbourhood' are confusing. It is noted that wording at the

end of the policy explains that ‘this policy only applies to the parts of the South Saxmundham Garden Neighbourhood that fall within the Saxmundham Neighbourhood Plan area’ however many of the requirements within this section of the policy refer to measures being applied across the wider SSGN e.g. criteria vi, vii, viii, and ix.

The NP is encouraged to make reference to the East Suffolk Cycling and Walking Strategy, which is currently proceeding through the adoption process and will be considered at ESC Cabinet on 4 October 2022 for adoption. The Strategy contains cycling and walking infrastructure recommendations for Saxmundham and the SSGN which are encouraged to be incorporated into NP policy. The draft Cycling and Walking Strategy is available to view here. ESC will provide a copy of the final Cycling and Walking Strategy to the examiner if considered appropriate.

### **Policy SAXGN2: Green infrastructure links**

Policy criterion iii) repeats Local Plan policy SCLP12.29v) and is therefore should be removed.

Policy criterion i) and green links c), e, and f) shown on Figure 27 propose green infrastructure across the A12 and the railway line. While ESC is supportive of high quality green infrastructure delivered through and connecting between new and existing developments, it isn’t clear what is expected from criterion i). Would cycling and walking connections across the A12 and over the railway line satisfy criterion i)? If so, this seems to duplicate provision for cycling and walking infrastructure in SAXGN1. If not, then further clarification of what is expected from criterion i) should be provided. It will be important that criterion i) does not overburden the delivery of the SSGN with for example expectation of wildlife bridges over the A12 and railway line that haven’t been considered through a viability assessment.

### **Policy SAXGN3: Community facilities**

Policy SAXGN3 also includes a note explaining that ‘this policy only applies to the parts of the South Saxmundham Garden Neighbourhood that fall within the Saxmundham Neighbourhood Plan area’. However, as with SAXGN2, the policy includes requirements that relate to the whole site, including areas outside the NP area.

### **Figures 29, 30, 31, and 32**

It is acknowledged that the advice of ESC earlier in the process of preparing the NP was to avoid hard edges to the boundaries of the Opportunity Zones’ polygons to demonstrate that the identified opportunities could be delivered in a variety of ways and on a variety of sites. However, having considered this further, ESC now considers that Figures 29, 30, 31, and 32 should be amended to avoid soft edges to the Opportunity Zone maps. Definitive

edges to the polygons are important to understand the exact boundary of the Opportunity Zones. The amendments will need to be reflected on the policies map.

### **Policy SAXSFR1: Street Farm Road Opportunity Zone**

Policy SAXSFR1 refers to zones 1 and 2, while figure 30 refers to sites 1 and 2. SAXSFR1 or figure 30 should be amended to ensure consistent referencing of the Opportunity Zone.

It is suggested that SAXSFR1 be amended to make reference to the recommended Saxmundham-Leiston Leisure Route of the East Suffolk Cycling and Walking Strategy, which is proposed to be a traffic free cycling and walking route between the two settlements. The second paragraph of policy SAX6 (Improving Connectivity) supports such infrastructure, and as Site 1/Zone1 of SAXSFR1 is located at one of the few potential traffic free cycling and walking entrances to Saxmundham it is recommended that SAXSFR1 be amended to make reference to the Saxmundham-Leiston Leisure Route. ESC will provide a copy of the final Cycling and Walking Strategy to the examiner if considered appropriate.

### **Housing Strategy and Enabling Manager comments**

Paragraph 10.7 states the results of the survey undertaken and the level of support for different types of home and tenures. Saxmundham NP has the opportunity to promote bungalows for all tenures, which would help meet the needs of older and disabled residents. In addition, they may like to support the delivery of M4(2) and M4(3) standards, especially in bungalows. This is supported by the local plan and Affordable housing SPD. In doing so, future homes will promote a domino effect, leading to the freeing up of family sized homes.

Shared ownership bungalows would be supported and I think there is a need for them, with a mix of 1 and 2 bed homes encouraging residents to move to a property that is more suitable for their needs.

Paragraph 10.9 states SCLP5.10 policy. There is an opportunity here to say that government policy now requires 25% of affordable housing to be delivered as First Homes. ESC has a policy statement about it here which the NP group may like to quote.

Paragraph 10.10, I do not agree that a 4 bed town house is suitable for a low income household, especially for a family who rent their home. I think this statement could be misleading when developers are considering future schemes.

### **Strategic Landscape Advisor comments**

Having taken an overview, it looks to be a good quality, well thought through plan to me. There is a good level of detail around landscape and natural environment, and I am pleased to see policies and specifics in place for the SSGN.

Generally speaking, and having reviewed a number of NP now, I do find many of the Aecom Design Guidelines and Codes rather generic, however as it is supported by a concept masterplan this should overcome any issues associated with a lack of specifics or recognition of identity that could come with such generic design codes.

### **Design and Conservation Team comments**

Design Guidelines and Codes for the Garden Neighbourhood and the Neighbourhood Plan Area: This document is thorough and detailed, with ambitious aims. It is well-illustrated with relevant photographs, drawings and diagrams, although the section on local vernacular architectural details and materials feels short.

General formatting: the page numbers on the contents list are incorrect.

SAX1: The policy is well-written and the criteria are well-supported by the Design Guidelines and Codes document. The policy does not promote a preference for traditional or contemporary design, but rather the creation of a sense of place and respect for local distinctiveness, which is positive.

Minor note: the Heritage and natural environment section is quite long – is there a reason why these are not separate?

Paragraph 11.2: Formatting note: It is unclear where the quote from the Conservation Area Appraisal ends.

Paragraph 11.10: The references to specific materials are welcomed.

Paragraph 11.14: The reference to the Historic Environment SPD is welcomed.

Policy SAX11 criterion f.i.: Local Suffolk bricks, e.g., soft reds largely on the rear elevations and hard whites on the front façades. I would recommend amending the wording of this sentence. White brick front façades and red brick rear elevations is indeed a traditional building style, however it refers to a particular time period and status, i.e. polite Georgian/Victorian buildings. I would recommend keeping the policy slightly more broad, for example: 'Local Suffolk bricks, e.g., soft reds and whites.'

Non-designated Heritage Assets: the references to PPG and Historic England's guidance are good. However, it should be mentioned that ESC also has its own published criteria for the identification of NDHAs: <https://www.eastsuffolk.gov.uk/planning/design-and-conservation/non-designated-heritage-assets/>

Policy SAX12: This is a well-justified list, showing a varied set of buildings and features that have local distinctiveness and historic importance, from different time periods. This is exactly the purpose of a locally identified list of Non-Designated Heritage Assets. The identification on maps is also useful.

Appendix B: Good use of established criteria for identification of NDHAs, inclusion of photographs is useful.

# Environment Agency

Thank you for your consultation dated 08 July 2022. We have reviewed the Regulation 16 submission of the Saxmundham Neighbourhood Plan and have the following comments regarding Flood Risk.

## **Flood Risk**

The majority of Saxmundham lies within Flood Zone 1, however there is a strip of land running through the centre of the town that falls within Flood Zones 2 and 3. The source of the risk is fluvial flooding from the main river Fromus. There are currently a number of residential and commercial buildings within Flood Zone 3 (land with a high probability of flooding) in addition to a significant amount of undeveloped land at risk of flooding from the river Fromus. Therefore, we would strongly encourage that flood risk is considered within the neighbourhood plan to inform future development within the Flood Zone and recommend that the plan is revised to include a policy specifically relating to flood risk.

The neighbourhood plan should reflect the flood risk objectives set out in policy SCLP9.5 of the East Suffolk Local Plan. This is in line with paragraph 004 of the Planning Practice Guidance: Neighbourhood Planning which states that a neighbourhood plan should support the delivery of the strategic policies set out in the Local Plan or Spatial Development Strategy. The East Suffolk Strategic Flood Risk Assessment (SFRA) was published in 2018 and should be used to inform policies considering flood risk and how this should be mitigated.

In particular, we would encourage that the neighbourhood plan reinforces the requirement for the sequential test, and if necessary, the exception test, to be applied for any new developments. It should also consolidate the need for new developments in Flood Zone 3 to be accompanied by a Flood Risk Assessment (FRA) which considers the risks of flooding from all sources and demonstrates how these risks can be mitigated. Please see our general flood risk comments below for information on how new development should be designed to not increase flood risk on-site or elsewhere, and how this should be demonstrated in an FRA.

Saxmundham also contains a significant area of land within Flood Zone 3b (the functional floodplain). The East Suffolk SFRA states that Flood Zone 3b is the land where water has to flow or be stored in times of flood and therefore development in this zone is considered inappropriate unless it is classified as water-compatible or essential infrastructure. We recommend that the neighbourhood plan reinforces this guidance and safeguards areas of Flood Zone 3b within Saxmundham from future inappropriate development within a policy specifically pertaining to flood risk. If a policy regarding flood risk is not included in a revised neighbourhood plan, we would want to see some wording in the basic conditions statement to demonstrate why it was decided that a policy was deemed not relevant.



Within the allocated 'opportunity-zones' we note that all more vulnerable development has been sequentially sited in areas of Flood Zone 1. It was also pleasing to see that the plan has proposed to re-develop zone 2 of the Street Farm Road area to provide sustainability benefits in a river-side environment through water-compatible development. Consideration should be given to the fact that as this 'zone' falls within Flood Zone 3b (functional floodplain), any development must fall within the water-compatible or essential infrastructure classifications and follow the principles set-out in paragraph 067 of the Planning Practice Guidance: Flood Risk and Coastal Change.

However, we are concerned about the identification of zone 1 of the Street Farm Road site as an 'opportunity zone' due to the inclusion of commercial and employment uses. The allocated site lies partially within Flood Zone 3a, and we are unsure whether the sequential test has been applied appropriately to direct new development away from flood risk areas. Any sites identified for development should adhere to point (a) in the East Suffolk Local Plan policy SCLP9.5 which states that neighbourhood plans can allocate land for development in areas at risk of flooding providing it can be demonstrated that there are no appropriate alternative sites. A revised plan should direct all vulnerable development away from areas at risk of flooding, or demonstrate how the principles of the sequential test have been met for the 'opportunity zones'.

Please see our general flood risk guidance for Neighbourhood Plans below:

### **General Flood Risk Guidance**

All development proposals within the Flood Zone (which includes Flood Zones 2 and 3, as defined by the Environment Agency) shown on the Policies Map and Local Maps, or elsewhere involving sites of 1ha or more, must be accompanied by a Flood Risk Assessment.

### Planning Practice Guidance (PPG)

The Neighbourhood Plan should apply the sequential test and use a risk based approach to the location of development. The plan should be supported by the local Strategic Flood risk Assessment (SFRA) and should use the NPPF Planning Practice Guidance (PPG). The PPG advises how planning can take account of the risks associated with flooding and coastal change in plan-making and the planning

application process. The following advice could be considered when compiling the Neighbourhood Plan to ensure potential development is sequentially sited or if at flood risk it is designed to be safe and sustainable into the future.

### Sequential Approach

The sequential approach should be applied within specific sites in order to direct development to the areas of lowest flood risk. If it isn't possible to locate all of the

development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. If the whole site is at high risk (Flood Zone 3), an FRA should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.

### Finished Floor Levels

We strongly advise that Proposals for 'more vulnerable' development should include floor levels set no lower than 300 mm above the level of any flooding that would occur if defences were overtopped in a 1% / 0.5% flood event (including allowances for climate change). Safe refuge should also be provided above the 0.1% undefended/breach flood level (including allowances for climate change). We are likely to raise an objection where these requirements are not achieved. We recommend 'less vulnerable' development also meets this requirement to minimize disruption and costs in a flood event. If this is not achievable then it is recommended that a place of refuge is provided above the 0.1% flood level (including allowances for climate change). Where safety is reliant on refuge it is important that the building is structurally resilient to withstand the pressures and forces (hydrostatic & hydrodynamic) associated with flood water. The LPA may need to receive supporting information and calculations to provide certainty that the buildings will be constructed to withstand these water pressures.

### Safe Access

During a flood, the journey to safe, dry areas completely outside the 1% (1 in 100) / 0.5% (1 in 200) AEP flood event, including allowances for climate change, should not involve crossing areas of potentially fast flowing water. Those venturing out on foot in areas where flooding exceeds 100 millimetres or so would be at risk from a wide range of hazards, including, for example; unmarked drops, or access chambers where the cover has been swept away. Safe access and egress routes should be assessed in accordance with the guidance document '[FD2320 \(Flood Risk Assessment Guidance for New Developments\)](#)'. We would recommend that you refer your SFRA which has produced hazard maps following a breach/overtopping of the defences.

### Emergency Flood Plan

Where safe access cannot be achieved, or if the development would be at residual risk of flooding in a breach, an emergency flood plan that deals with matters of evacuation and refuge should demonstrate that people will not be exposed to flood hazards. As stated above refuge should ideally be located 300mm above the 0.1% AEP flood level including allowances for climate change. An emergency flood plan

should be submitted as part of a FRA for any new development and it will be important to ensure emergency planning considerations and requirements are used to inform it.

## Flood Resilience / Resistance Measures

To minimise the disruption and cost implications of a flood event we encourage development to incorporate flood resilience/resistance measures up to the extreme 0.1% AEP climate change flood level. Information on preparing property for flooding can be found in the documents '[Improving the Flood performance of new buildings](#)' and '[Prepare your property for flooding](#)'. Increases in Built Footprint (excluding open coast situations) When developing in areas at risk of flooding consideration should be given to preventing the loss of floodplain storage. Any increase in built footprint within the 1% AEP, including allowances for climate change, flood extent will need to be directly compensated for to prevent a loss of floodplain storage. If there are no available areas for compensation above the design flood level and compensation will not be possible then a calculation of the offsite flood risk impacts will need to be undertaken. If this shows significant offsite impacts then no increases in built footprint will be allowed. Further guidance on the provision of compensatory flood storage is provided in section A3.3.10 of the CIRIA document C624.

## Climate Change

Our guidance 'Flood risk assessments: climate change allowances' should be used to inform the spatial distribution of growth and the requirements of Flood Risk Assessments (FRA) for individual applications.

The National Planning Practice Guidance provides advice on what is considered to be the [lifetime of the development in the context of flood risk and coastal change](#). The 'Flood risk assessments: climate change allowances' guidance provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand likely impact of climate change on river and surface water flood risk. For some development types and locations, it is important to assess a range of risk using more than one allowance. Please refer to this guidance. <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>. This advice updates previous climate change allowances to support NPPF and may result in flood extents being greater than they have been in the past. This does not mean out flood map for planning has changed, as these maps do not consider climate change, but fluvial flood maps that may have been produced as part of SFRAs and other flood risk studies may be out of date. FRAs submitted in support of new development will need to consider the latest climate change allowances.

## Environmental Permit for Flood Risk Activities

An environmental permit for flood risk activities may be required for work in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert.



## Historic England

We welcome the production of this neighbourhood plan in principle, but do not currently have capacity to provide detailed comments. We would refer you to our detailed guidance on successfully incorporating historic environment considerations into your plan, alongside advice on planning policy writing and some useful case studies, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood>.

For further advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate your local Historic Environment Record <https://www.heritagegateway.org.uk/Gateway/CHR/>.

There is also helpful guidance on a number of topics related to the production of neighbourhood plans and their evidence base available on Locality's website: <https://neighbourhoodplanning.org/>, which you may find useful.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

## National Highways

Thank you for your email correspondence, dated 08 July 2022, for inviting National Highways comments on the Saxmundham Neighbourhood Plan.

National Highways is responsible for the operation, maintenance and improvement of the Strategic Road Network in England on behalf of the Secretary of the State.

With respect to the Saxmundham Neighbourhood, it is remotely located from the nearest access to the Strategic Road Network (SRN) junction. Due to the location and nature of the proposed development, there is unlikely to be any significant effect upon the Strategic Road Network (SRN).

National Highways offer No Comment to this Saxmundham Neighbourhood Plan.

# Natural England

Thank you for your consultation on the above dated 08 July 2022

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

## **Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities**

### **Natural environment information sources**

The [Magic](#) website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#).

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#). Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas (NCAs)** divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#).

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park or Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#) website and also from the [LandIS website](#), which contains more information about obtaining soil data.

### **Natural environment issues to consider**

The [National Planning Policy Framework](#) sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#) sets out supporting guidance.

**Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.**

#### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

#### Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)), such as Sites of Special Scientific Interest or [Ancient woodland](#). If



there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

### Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)) or protected species. To help you do this, Natural England has produced advice [here](#) to help understand the impact of particular developments on protected species.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#).

### **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.

- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

# Suffolk and North East Essex Integrated Care Board

Thank you for consulting with Suffolk and North East Essex Integrated Care Board (ICB) regarding the Saxmundham Parish Council proposal to create a Neighbourhood Plan (NP). The ICB is encouraged to see that health and wellbeing is a constant thread throughout the NP and policies are designed to help the residents of Saxmundham obtain healthy and active lives. If residents are able to be more active and healthier then this reduces the impact on local healthcare services. The ICB recognises that Saxmundham does have primary healthcare facilities inside the parish. To maintain a healthcare service for the residents of Saxmundham, mitigation might be sought through Community Infrastructure Levy (CIL) or Section 106 contributions from developments in and around the area.

The Neighbourhood Plan does not allocate more development than that in the adopted local plan. The ICB has been working with local authorities and developers to look at the impact of proposed development and mitigating the impact on local health services. Primary Care Networks (PCN) have been created to provide additional teams within localities and these teams could be located in health facilities or community use facilities to aid ease of access.

## **Area Wide Objectives:**

### **Objective 2**

The ICB is in full support of this objective. Securing the community a full range of physical and community infrastructure is key to communities being active and healthy both physically and mentally. The ICB supports this as an objective and will be happy to continue working with East Suffolk Council and Parish Council in this endeavour.

### **Objective 3**

The health benefits of improving transport provision for communities is well established and the ICB is fully supportive of this objective. If footpaths and cycle routes can be made safer then data shows that more people will use those methods of transportation especially for travelling within the confines of a settlement locality.

## **Policies:**

### **SAX3 New Businesses**

Suffolk and North East Essex ICB notes that health, social care and community support services is listed as of the type of new business that will be supported.

#### **SAX4 Protecting Valued local community facilities and amenities**

Suffolk and North East Essex ICB values the parish councils' approach that the GP surgery is protected under policy Sax4.

#### **SAX5 New Community Facilities**

Suffolk and North East Essex ICB is very pleased to see that health facilities have been classified as essential infrastructure in the NP. With this in mind, work is progressing to look at mitigating the impact of the proposed development in the area. The ICB works closely with planning colleagues in ESC and will continue to do so as the plan progresses.

#### **SAX6 Improving Connectivity**

Suffolk and North East Essex ICB is encouraged to see that the Saxmundham NP is looking to optimise the plan period to improve pedestrian and cycling connectivity. It would be beneficial for this to include health facilities in the future.

#### **SAX10 Housing Mix**

Suffolk and North East Essex ICB would like to request that a small percentage of affordable housing in the proposed development is considered for "key worker housing". The NP states that the largest employer in Saxmundham is public admin, education and health. With this data in mind the ability to assign a small number of new affordable housing to people that work in this sector could help with staff retention.

We would welcome the addition of a simple statement, to confirm that Saxmundham Parish Council will support Suffolk and North East Essex ICB in ensuring sustainable provision of healthcare services for the residents of Saxmundham.

# Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Saxmundham Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in ~~striketrough~~.

## Neighbourhood Plan

### Education

SCC, as the Education Authority, is responsible for the provision of education facilities in Suffolk.

SCC raised concerns during the Pre-Submission consultation that access to a northern location of the school may create an enclosed, unattractive, and potentially unsafe route, with a lack of surveillance. It was suggested that the layout of this area is reconsidered.

Paragraph 97 of the NPPF states that planning decisions should “promote public safety” and take into account security “especially in locations where large numbers of people are expected to congregate”. Footnote 43 indicates that education establishments is included in this.

In the consultation statement, the response said: ‘The Town Council preference remains for the school to be located to the north of the site as many children will attend from Saxmundham’.

The purpose of the new primary school is to serve the needs of the additional children arising from the new Garden Neighbourhood development, and therefore should be best located to serve this community. 800 dwellings will result in approximately 200 children, which is sufficient capacity for a single form entry primary school.

We acknowledge that parental choice does mean that some children from the existing settlements may use the new school, but there is already an existing school in Saxmundham which will be the main facility for existing pupils in the town.

### Natural Environment

Whilst not a matter for the Basic Conditions, we note that the Appendix for Local Green Spaces justification has been amended as suggested during the Reg14 consultation, which we welcome.

However, site 1 Memorial Field does not have the site size included, and only says “not an extensive tract of land”. This should be added for consistency and in order to provide clarity to the reader.

### General

Figure 4 on page 10 is indicated to be a policies map of Saxmundham from the Suffolk Coastal Local Plan, however the image is missing the contextual details.

Paragraph 6.13 has added text regarding SCC guidance, however, please note that the Suffolk Design Streets Guide is now adopted, and is no longer in draft form.

### **Concept Masterplans and Design Code**

Paragraph 16, part d) of the NPPF states that plans should “contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals”.

Paragraph 128 of the NPPF indicates that a design code should provide clarity, however SCC is concerned that as this code has been prepared alongside the plan, it has policy weight to it. There is potential conflict here with the Design Codes and Masterplan for Saxmundham, and other guidance documents, such as the Suffolk Design Streets Guide.

The response from the steering group in the Consultation Statement indicated that “These documents are in their final form and have been signed off by Locality”.

Locality have indicated that when comments need to be addressed, the design code and masterplans can be updated by AECOM and would be approved by Locality.

As such, our comments raised during the pre-submission consultation should be reconsidered, and the Concept Masterplans and Design Code should be amended as we have proposed.

Our pre-submission response has been included as an appendix to this letter, below.

- [Suffolk County Council pre-submission response.](#)