



Saxmundham Neighbourhood Plan Referendum

Summary of Representations

This document contains summaries of the representations made in response to the publication of the Submission Saxmundham Neighbourhood Plan which was held between 8th July 2022 and 2nd September 2022. The full representations were submitted to the Examiner for consideration during the Examination of the Saxmundham Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

<https://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/saxmundham-neighbourhood-area/>

Respondent	Summary of representations
<p>East Suffolk Council</p>	<p>Highlights the Community Governance Review being undertaken and the potential for a new parish boundary for Saxmundham and clarifying that this would not, however, change the neighbourhood plan area.</p> <p>Raises concerns about the inclusion of policies and supporting documents relating to the South Saxmundham Garden Neighbourhood (SSGN) when the site does not fall entirely within the neighbourhood plan area.</p> <p>Requests the addition of wording within the plan to clearly explain the status of the proposed Masterplan and Design Code with regard to the SSGN.</p> <p>Suggests the inclusion of further explanatory text setting out the rationale for including the Opportunity Zones policies in the NP.</p> <p>Paragraph 2.1 Should be amended to state ‘...economic centres of East Suffolk district’ for accuracy.</p> <p>Suggests amendment to figure 15 to show all of the NP area and identify that in the key. Also suggests clearer distinction between polygons on the map.</p>

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	<p>Requests updated ref at paragraph 6.13 The Suffolk Design Streets Guide as this is now adopted.</p> <p>Policy specific comments</p> <p>Policy SAX1: General Design Principles</p> <ul style="list-style-type: none"> • Add reference materials being of high quality. • Reference to guidance should be removed. <p>7. Parish wide: Local economy</p> <p>Requests further consideration of the extent to which these polices duplicate or add value to those already contained in the Local Plan.</p> <p>Policy SAX2: Expansion of Existing Businesses</p> <p>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.</p> <p>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.</p> <p>8. Parish wide: Community infrastructure</p> <p>Supports the inclusion of policies relating to community facilities within the NP is supported, however 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.</p> <p>Suggests more attention be given to the Infrastructure Priorities of the town, including the infrastructure needs acknowledged in the Local Plan.</p> <p>9. Transport and movement</p> <p>Suggests further reference to the East Suffolk Cycling and Walking Strategy.</p> <p>Policies SAX6: Improving connectivity & SAX7: Public rights of way</p> <p>Given policy SAXGN1 addresses connectivity for the SSGN it’s probably not necessary to include such provision in policies SAX6 or SAX7.</p> <p>Policy SAX8: Parking provision</p> <p>Suggests policy SAX8 is 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.</p> <p>Accompanying footnote need to be updated to clarify that these are SCC’s parking standards.</p>

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	<p>Policy SAX9: Windfall and infill development Suggests consideration is 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.</p> <p>Policy SAX10: Housing Mix Raises concern about the lack of Housing Needs Assessment f to underpin policy SAX10 and suggests that Policy SAX10 be removed. Consideration should however be given to retaining 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.</p> <p>Policy SAX11: Historic town centre and Conservation Area Suggest amending 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.</p> <p>Figure 20 If the spaces around the church are intended to be included in the NDHA these should be included 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.</p> <p>Suggest updating the key to refer to the NP area instead of the parish boundary.</p> <p>Figure 23 Figure 23 should be updated to show green gateway B at the northern entrance to Saxmundham.</p> <p>Policy SAX14: Protection and enhancement of natural assets Suggest the policy is 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.</p> <p>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.</p> <p>Policy SAX16: Green Spaces</p>

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	<p>The identification of the Layers as Suitable Alternative Natural Greenspace (SANG), is not in general conformity with SCLP12.29v) in that Local Plan policy identifies this area of land as open space and SANG. This should be reflected in SAX16.</p> <p>Suggest SAX16 is updated to include criteria as to how development proposals on identified Local Green Spaces (LGS) should be considered.</p> <p>Policy SAXGN1: Connecting the Garden Neighbourhood</p> <p>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.</p> <p>Suggest additional references to the East Suffolk Cycling and Walking Strategy.</p> <p>Policy SAXGN2: Green infrastructure links</p> <p>Suggests removal of policy criterion iii) as it repeats Local Plan policy SCLP12.29v)</p> <p>Policy criterion i) and green links c), e, and f) shown on Figure 27 propose green infrastructure across the A12 and the railway line but it isn’t clear what is required from this criterion. Suggest that the criterion is amended.</p> <p>Policy SAXGN3: Community facilities</p> <p>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.</p> <p>Figures 29, 30, 31, and 32</p> <p>Suggests figures 29, 30, 31, and 32 be amended to avoid soft edges to the Opportunity Zone maps.</p> <p>Policy SAXSFR1: Street Farm Road Opportunity Zone Policy</p> <p>Suggests amending SAXSFR1 or figure 30 to ensure consistent referencing of the Opportunity Zone.</p>

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	<p>Suggest that SAXSFR1 be amended to make reference to the recommended Saxmundham-Leiston Leisure Route of the East Suffolk Cycling and Walking Strategy.</p> <p>Further comments from the Housing Strategy and Enabling Manager Consideration should be given to opportunities to promote bungalows for all tenures and suggest reference to supporting the delivery of M4(2) and M4(3) standards, especially in bungalows.</p> <p>Suggest further reference to the delivery of First Homes.</p> <p>Further comments from the Strategic Landscape Advisor Support for the inclusion of comprehensive references to landscape and natural environment within the neighbourhood plan.</p> <p>Further comments from the Design and Conservation Team Support for the inclusion of Design Guidelines and Codes for the Garden Neighbourhood and the Neighbourhood Plan Area. SAX1: The policy is well-written and the criteria are well-supported by the Design Guidelines and Codes document. 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.: recommends amending the wording of this sentence: ‘Local Suffolk bricks, e.g., soft reds and whites.’ Non-designated Heritage Assets: suggest adding reference to the ESC criteria for the identification of NDHA. 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. Appendix B: Good use of established criteria for identification of NDHAs, inclusion of photographs is useful.</p>
Environment Agency	<p>Summary of flood risk within the neighbourhood plan area and strongly encourages that flood risk is considered within the neighbourhood plan to inform future development within the Flood Zone and recommends that the plan is revised to include a policy specifically relating to flood risk.</p> <p>Suggests that the neighbourhood plan reflects the flood risk objectives set out in policy SCLP9.5 of the East Suffolk Local Plan and encourages that the neighbourhood plan reinforces the requirement for the sequential test, and if necessary, the exception test.</p>

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	<p>Notes that within the opportunity zones all more vulnerable development has been sequentially sited in areas of Flood Zone 1 and gives support for proposals to re-develop zone 2 of the Street Farm Road area to provide sustainability benefits in a river-side environment through water-compatible development. Suggests consideration of fact that as this 'zone' falls within Flood Zone 3b (functional floodplain), any development must fall within the water-compatible or essential infrastructure classifications.</p> <p>Raises concern 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. Suggests revisions to 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'.</p> <p>Cross reference to general Environment Agency guidance regarding the consideration of flood risk in Neighbourhood Plans.</p>
Historic England	<p>Historic England does not wish to comment on the Neighbourhood Plan at this time. Refers to Historic England generic guidance regarding the consideration of the historic environment in Neighbourhood Plans.</p>
National Highways	<p>No specific comments on the Neighbourhood Plan.</p> <p>Response confirms that the Neighbourhood Plan area is remotely located from the nearest access to the Strategic Road Network (SRN) junction and therefore is unlikely to result in any significant effect upon the Strategic Road Network (SRN).</p>
Natural England	<p>Natural England does not have any specific comments on this neighbourhood plan. Response does include general information, which covers issues and opportunities that should be considered in the neighbourhood plan process.</p>
Suffolk and North East Essex Integrated Care Board	<p>Supports consideration of health and wellbeing as a constant thread throughout the neighbourhood plan.</p> <p>Recognises that Saxmundham has primary healthcare facilities inside the neighbourhood plan area and suggests that mitigation might be sought through Community Infrastructure Levy (CIL) or Section 106 contributions from developments in and around the area.</p> <p>Particular support for objective 2 and objective 3.</p> <p>Notes reference to support for health, social care and community support services in policy SAX3.</p>

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	<p>Supports protection of the GP surgery in Policy SAX4.</p> <p>Supports the classification of health facilities as essential infrastructure in policy SAX5.</p> <p>Supports the promotion of pedestrian and cycling connectivity through policy SAX6.</p> <p>Suggests the inclusion of “key worker housing” within the affordable housing required through policy SAX10.</p> <p>Proposes the addition of a 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.</p>
<p>Suffolk County Council</p>	<p>Welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.</p> <p>Education 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.</p> <p>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.</p> <p>Natural Environment Requests that a site size is included for Site 1 This should be added for consistency and in order to provide clarity to the reader.</p> <p>General Request updated figure 4 on page 10.</p> <p>Requests updated reference to Suffolk Design Streets Guide at paragraph 6.13 as this is no longer draft.</p> <p>Concept Masterplans and Design Code Raises concern about a potential conflict between the Design Codes and Masterplan for Saxmundham, and other guidance documents, such as the Suffolk Design Streets Guide. Refers back to comments raised during the</p>

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	pre-submission consultation and requests that these be reconsidered, and the Concept Masterplans and Design Code amended.