



John Slater  
Independent Examiner  
By email only:  
[johnslaterplanning@gmail.com](mailto:johnslaterplanning@gmail.com)

**Date:** 18<sup>th</sup> November 2022  
**Please ask for:** Laura Mundy  
**Direct dial:** 01394 444 556  
**Email:** [laura.mundy@eastsoffolk.gov.uk](mailto:laura.mundy@eastsoffolk.gov.uk)

Dear Mr Slater,

### **Saxmundham Neighbourhood Plan - Initial Comments**

Please find below East Suffolk Council's response to your 'Initial Comments' document dated 1<sup>st</sup> November 2022. We have provided answers to those questions specifically directed to East Suffolk Council, and, where appropriate, provided some further information on the other matters raised. The Council's response is structured using the paragraph number of your 'initial comments' document.

#### Paragraph 4

Although a question directed to the Town Council, we thought it helpful to reiterate that the application of the sequential test must be balanced against the need for compatibility with sustainable development objectives (PPG para 23). As set out in ESC's Regulation 16 consultation response (page 5, 'Opportunity Zones'), the proposed Opportunity Zones "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 5

We agree with the Examiner's assessment of the awkward relationship between the neighbourhood plan and the garden neighbourhood, as set out in more detail in our Regulation 16 consultation response.

#### Paragraph 6

The proposed Saxmundham/Benhall parish boundary change was approved by East Suffolk Council on 28 September 2022 and will come into effect on 1 April 2023. Any further updates will be published on the Council's website here: <https://www.eastsuffolk.gov.uk/elections/community-governance-review-cgr/east-suffolk-council-community-governance-review-2021-2022/>

#### Paragraphs 7, 9 and 10

ESC would not support adopting the Aecom study as an SPD. ESC were not involved in producing

---

LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT  
DX: 41400 Woodbridge

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ  
DX: 41220 Lowestoft

the Aecom work and consider there to be deficiencies in stakeholder and community engagement as part of the process. The Aecom study has not, as far as we're aware, had the necessary involvement or sign off from the relevant statutory authorities (e.g. highway authority, lead local flood authority). Further detail regarding our concerns is set out in our Regulation 16 consultation response. Our view remains that, given the deficiencies with the masterplan, it cannot be afforded formal masterplan weight in the delivery of the site. A similar situation applies to the Design Code where it relates to the garden neighbourhood and therefore it is necessary for the neighbourhood plan to explain the status of these documents, reflecting that.

As raised by Suffolk County Council in their Regulation 16 response, there is also potential conflict between the Aecom studies and other guidance such as the recently adopted Suffolk Design: Streets Guide (<https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/suffolk-design-guide-for-residential-areas/>).

#### Paragraph 8

ESC would have supported an approach whereby the Neighbourhood Plan boundary extended into Benhall had the boundary of the SSGN been established at the time of the Neighbourhood Plan area application.

#### Paragraph 11

See pages 3-5 of our Regulation 16 consultation response.

#### Paragraph 12

See page 5 of our Regulation 16 consultation response- opportunity zones.

#### Paragraph 15

See page 6 of our Regulation 16 consultation response- parish wide infrastructure.

#### Paragraph 20

See page 9 of our Regulation 16 consultation response.

#### Paragraph 21

See page 9 of our Regulation 16 consultation response.

#### Paragraph 25

Suffolk County Council have recently submitted a planning application for the site (DC/22/2465/FUL) which consists of 12 supported dwellings with staff accommodation, new roadway and new shared footpath and cycle track, and outline consent for 19 dwellings. Demolition of Fromus Centre is included within these proposals. The proposed scheme includes provision of community garden and community allotments. Further details are available from our website at: <https://publicaccess.eastsuffolk.gov.uk/online-applications/>.

#### Paragraph 27

See page 10 of our Regulation 16 consultation response.

### Paragraph 28

See pages 10-11 of our Regulation 16 consultation response.

### Paragraph 29

See earlier comments regarding the garden neighbourhood and our Regulation 16 consultation response.

### Other matters

As stated on page 11 of our Regulation 16 consultation response, we said we would update the Examiner on the latest position of the East Suffolk Cycling and Walking Strategy. The strategy has now been adopted (4 October 2022) and can be viewed on our website at: <https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/>. The Strategy includes recommendations that relate to Saxmundham and we would support reference being made to the Strategy's recommendations in the neighbourhood plan, particularly in relation to the garden neighbourhood, and Opportunity Zones.

Please feel free to come back to me if you require any further clarification on the above matters.

Yours sincerely,



**Laura Mundy | Principal Planner (Policy and Delivery)**  
East Suffolk Council