



John Slater
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Date: 21st February 2023
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Dear Mr Slater,

Saxmundham Neighbourhood Plan – Post Hearing Note

Thank you for your note following the hearing sessions of the Saxmundham Neighbourhood Plan Examination. Please find below the response to the points raised in your note. A number of the points were directed to the Town Council, who have provided their response to me for inclusion in this letter along with the accompanying PDF (attached separately). For the most part, East Suffolk Council and Saxmundham Town Council are in agreement as to the way forward, but where there are areas of disagreement, or more than one option, I have sought to highlight this in the response below.

Also accompanying this response are the two maps that were requested at the hearing session to replace the corrupted maps from the submission version of the Plan, and the amended AECOM documents. As discussed at the hearing session, the AECOM documents are still subject to formal sign off from Locality, but have been provided to you now in draft form to assist in your consideration of the proposed amendments to the Plan.

ESC approach to masterplanning

Point 8 of your letter asked for clarification from East Suffolk Council as to how we intend to move forward with masterplanning for the South Saxmundham Garden Neighbourhood (SSGN). This is set out below:

In addition to the specific guidance set out in the supporting text of Local Plan Policy SCLP12.29 (in particular paragraph 12.290), the Council's wider expectations with regard to masterplanning are set out in our Statement of Community Involvement (SCI) which is available on our website at: <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Statement-of-Community-Involvement/Statement-of-Community-Involvement.pdf> The SCI sets out the principles that the Council expects applicants to adhere to when undertaking community engagement in support of the masterplanning process. This includes a specific requirement for applicants to identify and engage stakeholder groups, and is clear that this will include town/parish councils and

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neighbourhood planning groups (see SCI para 7.6).

In addition to the SCI requirements, the Council have, over the past four year's been working in partnership with other Suffolk authorities to establish a design management process which defines clear expectations. This is set out in the Suffolk Design Management Process (SDMP) Map: <https://www.suffolk.gov.uk/asset-library/imported/SDMP-Map-v2.2-16-07-21.pdf>. In respect of the SSGN masterplanning work undertaken so far, the site promoters can be considered to be at stage 4 of this process, with at least another round of consultation to be undertaken at stage 5. The Council expects stage 5 engagement to be extensive and it remains possible that a further round of consultation can be required if considered necessary. The Council's expectation is that the next round of engagement will commence with an initial meeting with the site promoters, East Suffolk Council and Saxmundham Town Council to agree next steps and maintain collaboration throughout the masterplanning process.

In relation to our response to point 8 of your letter, Saxmundham Town Council have asked that the following comments be forwarded to you for your consideration (I have set these out in full):

"We had anticipated a more bespoke, less generic response to the Examiner's request in relation to the community engagement exercise (including engagement with other stakeholders), given that the South Saxmundham Garden Neighbourhood as set out in SCLP12.29 is (a) the second largest proposal for housing development (inter alia) in the Local Plan and (b) represents a 40% growth in Saxmundham's population over a period of 10-15 year, the largest growth in the town's history. The Local Plan emphasises that the Garden Neighbourhood is to be a "sustainable extension to the existing built up area", i.e. Saxmundham town of which it will be an integral part.

We note again that Policy SCLP12.29 is explicit and mandatory on the requirement for community engagement in bringing forward the masterplan approach; in our view the reference in the Public Hearing to a "developer-led masterplan" is not consistent with the ESC's own policy: "This new development will be delivered through a masterplan approach brought forward through landowner collaboration and community engagement". We also recall that, according to paragraph 12.290, on which ESC here rely, the process is explained thus: "Landowner collaboration and partnership working with a range of stakeholders such as Suffolk County Council, Benhall Parish Council, Saxmundham Town Council and community groups will inform a masterplan for the garden neighbourhood covering the whole site as part of a future planning application."

At present, we are unaware of any proposal for "multiple landowner collaboration" and partnership working covering "the whole site" i.e. the site defined and allocated in the Local Plan. It must surely be the case that the Council's specific Local Plan policies (and the Plan's supporting text) are not diluted by the - by definition more general - wording of the Statement of Community Involvement. We note, within the Statement of Community Involvement, the section on masterplanning (p.49-50) which includes the requirement for the planning applicant to provide a "Statement as to how community involvement has informed the masterplan development".

We note the reference to the Suffolk Design Management Process (SDMP) Map, which we have now studied, and from this, would strongly contest the claim that "In respect of the

SSGN masterplanning work undertaken so far, the site promoters can be considered to be stage 4 of this process with at least another round of consultation to be undertaken at stage 5.” There has to date been no community engagement by the would-be applicant/developer in relation to the Local Plan site, and in accordance with the Local Plan policy, for reasons previously set out. The November 2020 to January 2021 alleged public consultation exercise by Pigeon was fatally flawed in that it did not comply with the allocated site or policy of the Local Plan approved only 2 months earlier. Amongst other matters, Stage 3 of the Map requires, under the heading “community understanding”, the following to be in place: “Community engagement milestones identified; Clear timescale; named contacts”. Under the heading “Council”, it requires “Identify & map engagement with stakeholders – including those that are hard to reach”. We have been given no evidence on these points that the requirements of Stage 3 have been met to date. Stage 4 states (under this head) “Community engagement commenced”. As stated, this is simply not the case as regards the Garden Neighbourhood.

We wish however to conclude on a more positive note – we welcome the last sentence of the ESC Statement which expresses an “expectation” (we would prefer “commitment”) that the next round of engagement will commence with an initial meeting with the site promoters, East Suffolk Council and Saxmundham Town Council to agree next steps and maintain collaboration throughout the masterplanning process. We fully agree that such a meeting is urgently needed, and we believe that this should indeed lead on to a proper agreed process of engagement throughout the masterplanning process– i.e. the collaboration and partnership working referred to in Paragraph 12.290. At the Public Hearing, we proposed that Community Planning workshops be organised, to include other stakeholders too, as an integral part of this partnership approach to masterplanning. We invite ESC to express now its own commitment to such an initiative, within the community/stakeholder engagement process.”

Potential modification to the NP

Policy changes

As suggested at point 10 of your note, the Town Council have produced proposed modifications which incorporate some of the principles of the SSGN policies into the generic policies elsewhere in the Plan. These are set out in the PDF accompanying to this letter.

East Suffolk Council have reviewed these changes and are happy with the proposed approach. We do, however, have some additional changes that we think should be incorporated into the proposed modifications. These have been shared with the Town Council who have confirmed that they are happy with these additional amendments:

- To reflect recent discussions as set out by Mr Woolnough at the hearing session, suggest additional wording to criteria i) of SAX6 to read:
 - i. Between new development and the railway station. To be achieved through a new cycle and pedestrian route from the development via the cemetery along the west side of the railway, or other route offering similar direct linkage, acknowledging that a segregated cycle path may not be achievable within highway land beyond the cemetery.
- We acknowledge that the connections listed in SAX6 have been labelled as ‘indicative’ and this is supported. However, a couple of the criteria read as more specific than we would expect for indicative connections and therefore we suggest the following amends:

- delete 'necessary' from criteria iii)b) as this isn't appropriate for indicative connections:

"b. a new cycle and pedestrian route to the west of the school playing field ~~which is necessary~~ to forge a strong connection"

- amend new criteria v) to better reflect the wording in SAXGN1 which referred to 'should be considered'. Reword to read:

"v) **Consider opportunities to explore an indicative new footpath....**"

Supporting text and objectives

A remaining area of disagreement between the Town Council and East Suffolk Council is the approach that should be taken to the remaining supporting text and objectives in Chapter 12. The Town Council have indicated that they wish to see the majority of the supporting text from Chapter 12 retained along with the two objectives relating to South Saxmundham Garden Neighbourhood (see pdf for details). The view of East Suffolk Council (given that this chapter won't contain any policies) is that the benefit of this text seems limited. There are, however, some paragraphs in Chapter 12 that could have more value if they were moved to sit alongside the amended generic policies or added to earlier chapters of the Plan. We have shared this suggestion with the Town Council who (notwithstanding their clear preference to retain the chapter) have provided the following response:

| Para | ESC suggested action | Sax TC response |
|-------|---|--|
| 12.1 | Delete- already covered by 1.23 | Agree |
| 12.2 | Delete as per QB suggestion | Agree |
| 12.3 | Move to sit under 1.24 or incorporate in 1.12 | Agree. Preference is for it to be relocated to follow 1.12 |
| 12.4 | Delete as it reads as applying to the whole site, some of which is outside the NP area. | Reluctantly agree although this is a factual description of the Local Plan policy. |
| 12.5 | Delete as per QB suggestion | Agree |
| 12.6 | Move to sit under 1.24 or incorporate in 1.12 | Agree. Preference is for it to be relocated to follow 1.12 and relocated 12.3 above. |
| 12.7 | Delete as it reads as applying to the whole site, some of which is outside the NP area. | Do not agree. STC is entitled to hold this view and state it in the NP. It does not undermine or conflict with the strategic policies. |
| 12.8 | Delete as it reads as applying to the whole site, some of which is outside the NP area. | Do not agree. STC is entitled to hold this view and state it in the NP. It does not undermine or conflict with the strategic policies. |
| 12.9 | Delete as it reads as applying to the whole site, some of which is outside the NP area. | Agree |
| 12.10 | Delete- covered by amended 12.12 (see suggestion below) | Agree |
| 12.11 | Move to sit with SAX6, to follow on from amended 12.12. | Agree |
| 12.12 | Amend as per QB suggestion, and move to sit with SAX6 (new para after 9.12) | Agree |
| 12.13 | Delete as it reads as applying to the whole site, some of which is outside the | Agree |

| | | |
|-------|---|-------|
| | NP area. Already covered by the general principals of SAX6. | |
| 12.14 | Delete as per QB suggestion | Agree |
| 12.15 | Delete as per QB suggestion | Agree |
| 12.16 | Delete as per QB suggestion | Agree |
| 12.17 | Delete as per QB suggestion | Agree |
| 12.18 | Delete as per QB suggestion | Agree |
| 12.19 | Move to sit as additional supporting text alongside SAX5 | Agree |
| 12.20 | Delete as per QB suggestion | Agree |
| 12.21 | Delete as per QB suggestion | Agree |
| 12.22 | Move to sit as additional supporting text alongside SAX5 | Agree |

Regarding the two SSGN objectives, the view of East Suffolk Council is that it would seem reasonable to retain Objective SSGN2, and this could be moved to Chapter 9 where it would relate well to amended policy SAX6. Objective SSGN 1 however, reads as applying to the whole of the Garden Neighbourhood, some of which lies outside of the plan area. As per the discussion around the SSGN policies, our view is that Objective SSGN1 should therefore be removed. Again, we have put this suggestion to Town Council, who have reiterated that their preference is to retain the two objectives in a separate chapter, however, if that is not possible, they have agreed that moving Objective SSGN2 to chapter 9 is logical. Were you minded to retain Objective SSGN1, the Town Council have suggested that it could be reworded to read “Creation of ~~To create~~ a high quality....”

Additional changes that may be required

In addition to the changes outlined in the extracts produced by the Town Council, there are some further consequential changes that will need to be made as a result of the removal of the SAXGN policies (there may be others depending on the approach you wish to take in response to the above points). These changes have been agreed with the Town Council:

- Paragraph 5.1- remove reference to ‘for South Saxmundham Garden Neighbourhood’.
- List of polices on page 30-31 will need to be updated to reflect deletion of SAXGN policies.
- SAX5: New Community Facilities- remove reference to SAXGN3 from criteria i. and the final sentence.
- Paragraph 9.20- remove reference to ‘for the Garden Neighbourhood’.
- SAX8: Parking provision- update reference to design code in final sentence.
- SAX11: Historic town centre and Conservation Area- update reference to design code in final sentence.
- Paragraph 11.34- remove reference to SAXGN2 from final sentence.

In reviewing the policies in light of your post hearing note, we have also identified a couple of additional changes that you may wish to take account of in your report. Again, these have been agreed with the Town Council:

- Reference to the ‘draft Suffolk Design Streets Guide’ at para 6.13 can be updated as it is no longer a draft document.
- Given the amendments to policy SAX6 are reflected in the figure immediately below the policy it would be helpful if the numbered references to each piece of cycling and walking infrastructure was consistent between the policy (i-v)) and the figure (1-6).

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'L. Mundy'.

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