

# Saxmundham Neighbourhood Plan 2022-2036

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## **Submission Version**

A Report to East Suffolk Council on the Examination of the  
Saxmundham Neighbourhood Plan

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16th March 2023

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## Executive Summary

My examination has concluded that the Saxmundham Neighbourhood Area Plan should proceed to referendum, subject to the Plan being amended in line with my recommended modifications, which are required to ensure the plan meets the basic conditions. The more noteworthy include –

- That specific reference to the Design Guidelines and Codes document be included within the Design policy.
- Not restricting support for development for existing businesses to those which increase jobs or training.
- The new business policy should support all business, not just those in specific sectors.
- Deleting the existing community services protection policy, as it adds nothing to the existing local plan policy.
- Removing the differentiation between essential and desirable infrastructure.
- Revising the Transport and Movement policy to incorporate elements of the policies for linkages and connection to the residential development taking place to the south of the town.
- Removing requirements for the parking policy to require electric bike and electric car charging and to now include a requirement for the minimum size of garages.
- Replacing the housing mix policy, which is not based on evidence, with a policy requiring residential development to be “tenure blind”.
- Bringing the policy regarding non-designated heritage assets into alignment with Secretary of State policy.
- Removing View 6 from the valued views map as it is outside of the plan area.
- Amending the policy on the allotments and community garden so that they are to be strongly encouraged on large-scale housing developments.
- Clarifying the implications of local green space designation.
- Deleting the three specific policies related to the South Saxmundham Garden Neighbourhood.

The referendum area does not need to be extended beyond the Plan area.

## Introduction

1. Neighbourhood planning is a process, introduced by the Localism Act 2011, which allows local communities an opportunity to create the policies that will shape the places where they live and work. A neighbourhood plan does provide the community with the ability to allocate land for particular purposes and to prepare the policies that will be used in the determination of planning applications in their area. Once a neighbourhood plan is made, it will form part of the statutory development plan alongside the policies in the East Suffolk Council - Suffolk Coastal Local Plan, adopted in September 2020. Decision makers are required to determine planning applications in accordance with the development plan, unless material considerations indicate otherwise.
2. The neighbourhood plan making process has been undertaken under the supervision of Saxmundham Town Council. A Steering Group was appointed to undertake the Plan's preparations.
3. This report is the outcome of my examination of the Submission Version of the Saxmundham Neighbourhood Plan. My report will make recommendations, based on my findings, on whether the Plan should go forward to a referendum. If the Plan then receives the support of over 50% of those voting at the referendum, the Plan will be "made" by East Suffolk Council.

## The Examiner's Role

4. I was appointed by East Suffolk Council in October 2022, with the agreement of Saxmundham Town Council, to conduct this examination.
5. In order for me to be appointed to this role, I am required to be appropriately experienced and qualified. I have over 44 years' experience as a planning practitioner, primarily working in local government, which included 8 years as a Head of Planning at a large unitary authority on the south coast, but latterly as an independent planning consultant and director of my neighbourhood planning consultancy, John Slater Planning Ltd. I am a Chartered Town Planner and a member of the Royal Town Planning Institute. I am independent of East Suffolk Council and Saxmundham Town Council and I can confirm that I have no interest in any land that is affected by the Neighbourhood Plan.
6. Under the terms of the neighbourhood planning legislation, I am required to make one of three possible recommendations:

- That the Plan should proceed to referendum on the basis that it meets all the legal requirements.
  - That the Plan should proceed to referendum, if modified.
  - That the Plan should not proceed to referendum on the basis that it does not meet all the legal requirements.
7. Furthermore, if I am to conclude that the Plan should proceed to referendum, I need to consider whether the area covered by the referendum should extend beyond the boundaries of the area covered by the Saxmundham Neighbourhood Plan area.
  8. In examining the Plan, the Independent Examiner is expected to address the following questions:
    - Do the policies relate to the development and use of land for a Designated Neighbourhood Plan area in accordance with Section 38A of the Planning and Compulsory Purchase Act 2004?
    - Does the Neighbourhood Plan meet the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 - namely that it specifies the period to which it is to have effect? It must not relate to matters which are referred to as “excluded development” and also that it must not cover more than one Neighbourhood Plan area.
    - Has the Neighbourhood Plan been prepared for an area designated under Section 61G of the Localism Act and been developed and submitted by a qualifying body?
  9. I am able to confirm that, if modified in accordance with my recommendations, the Plan only relates to the development and use of land, covering the area designated by East Suffolk Council, for the Saxmundham Neighbourhood Plan, on 29<sup>th</sup> August 2017.
  10. I can also confirm that it does specify the period over which the Plan has effect, namely the period from 2022 up to 2036, which coincides with the end date of the adopted East Suffolk Council- Suffolk Coastal Local Plan.
  11. I can confirm that the Plan does not contain policies dealing with any “excluded development”.
  12. There are no other neighbourhood plans covering the area covered by the neighbourhood area designation.
  13. I am satisfied that Saxmundham Town Council as a parish council can act as a qualifying body under the terms of the legislation.

## **The Examination Process**

14. Once I had reviewed the submitted documents, my first task was to conduct a site visit to Saxmundham. This was carried out on Friday 28<sup>th</sup> October 2022.
15. I arrived into the town from the south, through South Entrance. There were major electricity works taking place within the town centre, which prevented me driving down the High Street, so I parked up in Tesco’s carpark. I was then able to extensively explore the town centre on foot, including the area up to the railway station and along to the railway overbridge by the Museum.

Despite the highway works, the town centre was busy. I was able to appreciate the quality of the conservation area.

16. Upon returning to my car, I then commenced a tour of the residential areas of the town, firstly in the south-western quadrant where I drove up to the secondary school and I was able to enter the site of the vacant Fromus Centre, off Seamans Avenue. I then moved across to the area off Brook Farm Road, through to North Entrance. I was then able to drive into the car park of Carlton Park sports and recreation ground. Leaving the town to the north, I then proceeded along Clayshill Road, taking in the Viewpoint 6 before returning to the town centre via St Johns Road to see the Station Area Opportunity Zone. I then exited the town to the east, along the B1119 and when I returned, I was able to appreciate Viewpoint 5.
17. During my visit, I visited most of the viewpoints, the local green spaces proposed and the non-designated heritage assets being put forward in the plan.
18. Towards the end of my visit I drove along the A12 and I was able to note the proposed location of the access into the new garden neighbourhood, as well as the location of the proposed employment allocation site, which has been put forward in the local plan. I made a final circuit back to the town from Benhall, noting the location of the proposed SANG – The Layers and its relationship to the garden neighbourhood over the railway, as well as the historic setting of Hurts Hall on the eastern side of the road.
19. Upon my return from Suffolk, I prepared the document entitled Initial Comments of the Independent Examiner, dated 1<sup>st</sup> November 2022. In the document, I raised a number of issues relating to specific policies, as well as highlighting issues relating to the current town council boundary and its implications for the comprehensive masterplanning of the proposed garden neighbourhood allocation. Responses were received from the Neighbourhood Plan Steering Group and East Suffolk Council on 18<sup>th</sup> November 2022.
20. Once I had a chance to digest the responses, I came to the conclusion that a public hearing would, in this case, be required to test the plan's proposals and its impact on the masterplanning of the garden neighbourhood. Whilst the holding of a public hearing is not usually necessary to examine a neighbourhood plan, in this case, I felt that it would be justified in order for me to fully explore this issue. I informed East Suffolk Council of my conclusions and I asked the officers to liaise with the Town Council to find an acceptable date and venue for the hearing. I was subsequently informed that all parties were not available until the end of January and I have therefore published my Notice of Public Hearing on 16<sup>th</sup> December 2022. This set out the arrangements for the hearing, establishing how it would be conducted and the questions that I wanted the hearing to address.
21. The public hearing took place on 27<sup>th</sup> January 2023, at the Fromus Centre in Saxmundham. It started at 9:30am and it lasted until 12.30pm. The only parties that were invited to participate were the Town Council and the District

Council and the hearing was well attended by members of the public. I would like to place on record, my appreciation for the constructive approach exhibited by all the contributors.

22. In order to summarise the position that had been arrived at, at the end of the hearing and my expectations for various revisions to the documents that would be required, I offered to issue a Post-Hearing Note, which I published on 30<sup>th</sup> January 2023 and this set out the specific actions, which had been agreed.
23. I received a joint response in a letter dated 21<sup>st</sup> February 2023 from East Suffolk Council which had been prepared in consultation with the Town Council. That set out the respective positions of the 2 Councils in terms of their expectations for the masterplanning of the South Saxmundham Garden Neighbourhood going forward as well as consequential changes to the text and policies resulting from the removal of policies related to the SSGN. I will discuss these in the relevant section of my report.

## **The Consultation Process**

24. Once the Town Council had decided to prepare a neighbourhood plan, in 2017, the first meeting was held that September attended by community representatives. This was followed up by a public open meeting that was held in early November 2017 which looked out the issues the residents considered to be important and the challenges facing the town.
25. The next stage of public engagement was a series of themed public meetings held in summer of 2018, dealing with housing, the town centre and the local economy. Students at SET Saxmundham School conducted their own survey which was completed by 135 students, giving their views on the town.
26. A household survey was distributed, in June 2019, to 2,200 households, which generated 550 responses.
27. All this activity culminated with the preparation of the Pre-Submission version of the Neighbourhood Plan which was the subject of a seven - week consultation, known as the Regulation 14 Consultation, which ran between 5<sup>th</sup> November and 22<sup>nd</sup> December 2021. This consultation was launched with a two-day exhibition held at the Market Hall. This exercise generated 91 responses from residents as well as 10 other responses, which are all set out in Appendix 7 of the Consultation Statement.

## **Regulation 16 Consultation**

28. I have had regard, in carrying out this examination, to all the comments made during the period of final consultation, which took place over an eight- week period, between 8<sup>th</sup> July 2022 and 2<sup>nd</sup> September 2022. This consultation was organised by East Suffolk Council, prior to the Plan being passed to me for its examination. That stage is known as the Regulation 16 consultation.

29. In total, 7 responses were received, including: Suffolk County Council, East Suffolk Council, National Highways, Natural England, Historic England, Environment Agency and Suffolk and North East Essex Integrated Care Board.
30. I have carefully read all the correspondence and I will refer to the representations where relevant to my considerations and conclusions in respect of specific policies or the Plan as a whole.

## **The Basic Conditions**

31. The Neighbourhood Planning Examination process is different to a Local Plan Examination, in that the test is not one of “soundness”. The Neighbourhood Plan is tested against what are known as the Basic Conditions as set down in legislation. It will be against these criteria that my examination must focus.
32. The five questions, which seek to establish that the Neighbourhood Plan meets the basic conditions test, are: -
- Is it appropriate to make the Plan having regard to the national policies and advice contained in the guidance issued by the Secretary of State?
  - Will the making of the Plan contribute to the achievement of sustainable development?
  - Will the making of the Plan be in general conformity with the strategic policies set out in the Development Plan for the area?
  - Will the making of the Plan breach or be otherwise incompatible with EU obligations or human rights legislation?
  - Will the making of the Plan breach the requirements of Regulation 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017?

## **Compliance with the Development Plan**

33. The development plan is the East Suffolk Council - Suffolk Coastal Local Plan which was adopted on 23<sup>rd</sup> September 2020. Appendix M of the plan identifies the policies which are to be treated as strategic policies, which the neighbourhood plan needs to be in general conformity with, in order to meet one of the basic conditions tests.
34. Policy SCLP3.1 sets out the strategy for growth in the plan area which includes providing for a significant boost for housing, through the provision of at least 9,756 new homes over the period 2018 - 2036, part of which is to be located in South Saxmundham, in one of the garden neighbourhoods proposed. Beyond existing commitments, there is a residual need for 2,758 homes to be provided during the plan period. The plan provides for approximately 800 new homes to be provided within the South Saxmundham Garden Neighbourhood.



35. Saxmundham is identified as a market town, which is one of the second-tier settlements identified, in Policy SCLP 3.2, within the settlement hierarchy, where site allocations will provide most of the housing, supplemented by windfall development. The approximately 800 dwellings referred to within the housing allocation for South Saxmundham is additional to existing commitments and allocations in Saxmundham, so the overall level of housing expected in the town, is to be in the region of 980 new units as set out in Table 3.5.
36. Market towns are expected to have a settlement boundary within which development is likely to be acceptable in principle, in accordance with Policy SCLP 3.3.
37. The town centre at Saxmundham lies in the second tier of the retail hierarchy as set out in Policy SCLP 4.8. Policies for town centres are specifically established in Policy SCLP 4.9 and Policy SCLP 4.10 encourages the role of the town centre by improving access for non-car modes, enabling physical linkages and environment improvements.
38. Policies for establishing housing mix are set out in Policy SCLP 5.8, although this does acknowledge that neighbourhood plans can set their own approach, if backed up by evidence. Policy SCLP 10.4 similarly allows neighbourhood plans to include local policies relating to the protection and enhancing local landscape character. Design quality is covered by Policy SCLP 11.1, which encourages neighbourhood plans to set out design policies which reflect local circumstances. Policy SCLP 11.6 deals with non-designated heritage assets and similarly empowers neighbourhood plans to identify these buildings within the area.
39. Policy SCLP 12.1 is a policy which sets out the minimum housing numbers for neighbourhood plans, which in the case of Saxmundham states that “small-scale additional development and windfall” in addition to the 800 units proposed for the garden neighbourhood will be expected.
40. The Local Plan document has a section presenting area based strategies and one of these is for Saxmundham, where the overall strategy for the town is laid out in Policy SCLP 12.28 which refers to “enhancing the vitality of the town centre, utilising opportunities linked to the railway and the A12, developing employment opportunities, enhancing connectivity especially to the town centre and the road station, enhancing green infrastructure, providing more housing and affordable homes and protecting the natural environment”. This is followed by Policy SCLP 12.29 dealing with the South Saxmundham Garden Neighbourhood which will cover 67.8 hectares. This policy calls for the development of a masterplan “brought forward through landowner collaboration and community engagement”. Finally, Policy SCLP 12.30 identifies land on the north-east of Street farm for the approximately 40 units. This has been carried forward from a previous DPD and has now been completed.
41. My overall conclusion is that the Neighbourhood Plan, apart from where I have noted in the commentary on individual policies, is in general conformity

with these strategic policies in the East Suffolk Council- Suffolk Coastal Local Plan.

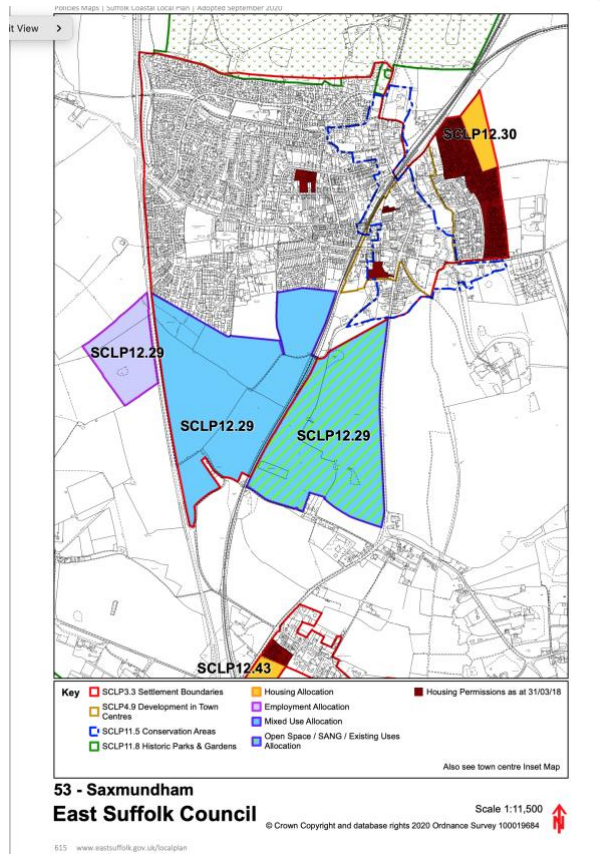
## **Compliance with European and Human Rights Legislation**

42. East Suffolk Council issued a Screening Opinion, in a report dated May 2022, which concluded, after consulting the 3 statutory bodies, that a full strategic environmental assessment, as required by EU Directive 2001/42/EC, which is enshrined into UK law by the “Environmental Assessment of Plans and Programmes Regulations 2004”, would not be required.
43. The Council, as competent authority, in a screening report also dated May 2022, screened the Plan under the Conservation of Habitat and Species Regulations. This concluded that a full Habitat Assessment would not be required as the plan would not be expected to have any significant effects upon any of the European protected sites which lie within 20 km of the parish as set out in Appendix 3 of the screening determination.
44. I am satisfied that the basic conditions regarding compliance with European legislation, including the more recent basic condition regarding compliance with the Habitat Regulations, are met. I am also content that the Plan has no conflict with the Human Rights Act.

## **The Neighbourhood Plan: An Overview**

45. Whilst much of this examination has been dominated by the extent to which the submitted plan can set the guidelines for the masterplanning of the proposed garden neighbourhood, this neighbourhood plan is actually a much wider document, which covers a range of issues that are clearly important to residents, beyond the integration of this major residential expansion with the rest of the town.
46. I have particularly in mind, the proposals for revitalising and enhancing the town centre, which puts flesh on the bones of the overarching Saxmundham local plan policy which identifies the need to regenerate the town centre. The plan displays a commitment to positive planning by identifying “Opportunity Zones” for specific areas of the town centre and also for the former Fromus Centre. Hopefully both will be the catalyst for major investment in the town.
47. The plan places great importance on good design, both in terms of its policy expectations for the plan area (SAX1) and especially for the Conservation Area in the heart of the town centre (SAX 11), but also goes further in terms of illustrating what is expected through the publication of the Design Guidelines and Code for the Neighbourhood Plan Area.
48. I would also like to commend the quality of the document and the professionalism of its presentation. There is one map in the document which was intended to identify the local plan policies which cover the town, which

has been corrupted, and I have been provided with the attached plan which needs to be inserted as a replacement Figure 4.



49. I now wish to address what I have identified as the critical issue in terms of whether the policies in the plan, in particular Chapter 12 “Site Specific: South Saxmundham Garden Neighbourhood” and the 3 specific policies, Policy SAXGN1, Policy SAXGN2 and Policy SAXGN3, meet the legal tests.
50. The current parish boundary bisects the proposed urban extension. Quite understandably, in view of the scale of the new development that will increase Saxmundham’s population by 40% over the next decade or so, the Town Council is wishing to set out its expectations on how this new neighbourhood will integrate with the rest of the town, whether it be through the provision of footpath and cycleway connections or the delivery of infrastructure / services / community facilities.
51. The fundamental issue for this examination is that a neighbourhood plan can only establish planning policies for the land that falls within the designated neighbourhood area. Whilst the wording of the supporting text and indeed the policies, do recognise that the neighbourhood plan policies can only be applied to the plan area, nevertheless the plan and the policies are seeking to shape and guide the overall masterplanning of the new neighbourhood, including those areas within Benhall parish. It is doing this by reference to the Town Council’s expectations for the whole area and the policies recognise that some facilities and proposed routes will be located outside the current parish boundary.

52. The legislation does allow a neighbourhood plan to prepare planning policies for land within an adjoining parish, but only if the parish council of that area has given its agreement, which I have been advised has not been given in respect of the South Saxmundham Garden Neighbourhood. I was advised that Benhall Parish Council did not engage formally with the Saxmundham Neighbourhood Plan.
53. The situation is further complicated by the fact that from the beginning of this April 2023, the parish boundaries are being revised and the whole of the proposed garden neighbourhood area will then fall under the jurisdiction of Saxmundham Town Council. However that change alone would not alter the boundary of the neighbourhood area as it was originally designated in 2017.
54. The specific Local Plan Policy for the South Saxmundham Garden Neighbourhood, Policy SCLP12.29, recognises the importance of the comprehensive masterplanning of the entire development. I support that aspiration which is entirely consistent with sound planning practice. However that cannot be delivered by a neighbourhood plan document that only covers part of the proposed urban extension. The policies in the Saxmundham Neighbourhood Plan could not be a material consideration when determining planning applications covering the southern part of the site, which lies outside the neighbourhood area.
55. I came to the conclusion, early in this examination, that the sections of the neighbourhood plan document that related to the specifics of the garden neighbourhood development, do not meet the legal requirements set in Section 38A of the Planning and Compulsory Purchase Act 2004 as they related in part to land outside the neighbourhood area. They also failed the basic conditions tests, in terms of general conformity with the strategic policies for the South Saxmundham Garden Neighbourhood, and inconsistent with Secretary of State policy, as set out in paragraph 73 of the NPPF, which deals with the planning of larger scale developments such as “significant extensions to existing villages and towns”.
56. This issue was fully explored at the hearing. I did offer my view that once, post April, the additional land was incorporated into the Saxmundham parish boundary, the Town Council could apply for a modification to that neighbourhood plan boundary, to extend the area of the plan and which would allow it to propose modification to the neighbourhood plan to incorporate new policies, which set out its aspirations for the whole of the strategic allocation. That could be done either through withdrawing and resubmitting this version of the plan (which is likely to lead to much abortive work) or more likely through the modification procedures to the “made” plan.
57. This latter route continues to be open to the Town Council and would allow it, if it felt it was necessary, to be able to take the initiative in terms of pressing its aspirations for the masterplanning of the SSGN, through the neighbourhood plan process.
58. However at the hearing, East Suffolk Council’s representatives indicated that the site promoters had decided to place their own masterplanning process on

hold, whilst the neighbourhood plan was being progressed, but they were now expected to re-establish the collaborative engagement in order to progress the masterplan. The expectation was that it would follow the process for community engagement for large scale developments as set out in East Suffolk's Statement of Community Involvement and also be in line with the framework known as The Suffolk Design Management Process Map which is being rolled out by the local planning authorities across Suffolk.

59. I asked East Suffolk Council to set out in writing, its expectations on how the masterplanning of the SSGN would proceed, as an action included within my Post Hearing Note. That has been done and the Town Council has set out its views in the joint response dated 21st February 2023, indicating that there is still some disagreement as to the current stage the site promoters have reached, in terms of the Suffolk Design Management Process, particularly as it appears their aspiration is to incorporate land beyond the local plan strategic allocation. Despite their reservations, the Town Council does welcome the council's stated expectation that the developers next stage of community engagement would be kicked off with an initial meeting between the site promoters, East Suffolk Council and Saxmundham Town Council to agree the next steps and to maintain effective collaboration throughout the masterplanning process.
60. As examiner to the neighbourhood plan, I see my role is to ensure that the neighbourhood plan, which only covers part of the strategic allocation, does not undermine the comprehensive and effective masterplanning of this key development which extends into the adjacent parish. It is not within my remit to make recommendations on how future engagement on the master planning of the SSGN is to be enacted, outside of the neighbourhood plan process. This is a matter for the respective parties, but I do note, as I referred to earlier, that the Town Council always retains the option of using the neighbourhood planning powers, to seek to establish, through what would be part of the development plan, planning policies which guide the planning of this major development for the town, so long as those policies are in general conformity with the strategic policies set out in the local plan.
61. During the hearing, and afterwards, it is clear that that the Town Council now acknowledges the position that I have taken in respect of the policies relating to the garden neighbourhood and it has worked with East Suffolk Council, in putting forward suggested modifications, both in terms of the supporting text and also to the wording of policies, for my consideration. I will refer to these in respect of particular policies but for ease of reference I will attach that document as an Appendix to this report. My general conclusion is that the amendments are helpful and can be generally accepted. Similarly, the Town Council has submitted revised documents, prepared by AECOM, relating to the Design Guidelines and Code for the Neighbourhood Area and also the Concept Masterplan for the High Street, removing reference to the South Saxmundham Garden Neighbourhood which featured in the submission

versions. I am treating these revised documents as the submission document going forward and these are referenced in my recommendations.

62. Beyond these issues, I would complement the Town Council on the plan which I have had to make relatively minor changes to address basic condition issues and I am explicitly satisfied that the plan through its policies encouraging good design, economic development, community facilities, ensuring that all housing meets the needs of the residents plus protecting heritage, locally valued views and green spaces, will together help to deliver the three strands of sustainable development.
63. The Town Council has helpfully provided me with its proposed revisions to the plan that takes on board my concerns related to the inclusion of policies covering the South Saxmundham Garden Neighbourhood. That has been very helpful and I have been able to make detailed recommendation to the supporting text that stem from the proposed modifications although I have not accepted them all. These are not recommendations that I would ordinarily be making.
64. However, there are other of my recommendations for modifications to, or even deletion of, policies, which will require some rewriting or removal of the supporting text, to ensure that the plan reads as a coherent planning document. I consider that the drafting of such text goes beyond my remit as examiner and indeed it is best if these changes are created by the Town Council, as it is its document. There may be other amendments required that stem from the changes or the points identified at the end of the 21<sup>st</sup> February 2023 letter, helpfully made by East Suffolk Council, which cover minor editorial issues. Similarly the deletion of policies will require the changes to the policy numbering as well as the numbering of the maps.
65. I will leave it to the Town Council to work alongside the East Suffolk Council planners to address these changes, when preparing the Referendum Version of the plan, which will have to be published alongside East Suffolk Council's Decision Statement.

## **The Neighbourhood Development Plan Policies**

### **Policy SAX 1: General design principles**

66. This is a comprehensive design policy which is consistent with sound urban design principles. It follows guidance set out in the National Design Guide and as advocated in the National Model Design Code which encourages the development of specific neighbourhood design policy as echoed by paragraph 127 of the NPPF.
67. At the hearing, there was a discussion about what status should be accorded to the Saxmundham Design Guidelines and Codes for the Garden Neighbourhood Area. It was referred to as an evidence document which was used to inform the drafting of the policies, especially in relation to the garden neighbourhood. For the reasons which I have referred elsewhere, I have

asked that all reference to the garden neighbourhood be withdrawn from the document. The revisions to the document can now mean that it can be used as a design guide for all development within the town, setting out local design aspirations and the document describes the town's defining characteristics. My recommendation will be to refer to this Design Guidelines document within the policy itself, which will bring it closer into alignment with Secretary of State policy. I am satisfied that the policy will sit comfortably beside the local plan's design policy.

### **Recommendations**

***The modified text put forward as Proposed Modifications by the Town Council be incorporated in the document, except that the reference in the first bullet point in paragraph 6.13 should refer to the Suffolk Design Streets Guide.***

***Insert a new second paragraph in the policy with the following text  
"Proposals should have regard to the advice contained within the Design Guidelines for the Neighbourhood Plan area as set out in Appendix X"***

### **Policy SAX 2: Expansion of existing businesses**

68. This policy deals with the expansion or intensification of *existing businesses* within the plan area whilst Policy SAX 3 relates to development for *new business*. The policy places great importance on retaining or increasing jobs within the town, especially if the business provides skills training for young people. This is a laudable objective. However as the District Council rightly points out, planning applications are required to be submitted for proposals which constitute "development", whether it be a new building, a change of use, extensions, plant or machinery etc. It is through such development that existing companies can invest, expand and adapt. As the Framework points out "New development can facilitate new investment which can drive innovation and economic growth".
69. I do not consider that it is the number of jobs that can be the key determinant, when assessing the acceptability of proposals for additional business floorspace. A decision maker cannot know, with certainty, whether or not the current company will, as a result of the development, be taking on new employees or will provide skills training. That, of course, could be a positive outcome arising from the development, but that outcome is patently not a matter that can be controlled by planning powers. For example, an existing company may wish to relocate within the town, perhaps moving to smaller premises, as a means of downsizing. I consider that the aspirations of the plan can be recognised by offering positive support for expanded business development by changing the emphasis of the policy to offer additional support especially when jobs are to be created. That does not then militate against those projects which cannot demonstrate that they will "retain or increase the number of jobs in the town".



70. On a similar theme, the acceptability of a proposal cannot be determined on the basis of whether it will “enhance the viability and viability of the town”. I will seek to amend the wording accordingly so that it is consistent with approach advocated in Policy SCLP 4.1 of the Local Plan.

#### **Recommendations**

***After “changes of use” insert “especially those which retain or increase the number of jobs, and provide skills development particularly those for young people”***

***In a) delete “by retaining or increasing the number of jobs within the town” and insert at the end “and”***

***Delete b) and c)***

#### **Policy SAX3: New businesses**

71. Local Plan Policy SCLP 12.28, when setting the overall strategy for the town refers to the need to diversify and expand employment opportunities. The neighbourhood plan appears to be seeking to only specifically offer support for six types of businesses or sectors of the economy.
72. In order to maximise the economic benefits arising from new business locating to the town, I consider that all new businesses should be supported through the planning process, as a matter of principle. Often development proposals will be advanced for Class E or Class B2/ B8 uses before the nature of the occupiers will be known – they will be built as speculative development. I can put forward a recommendation that recognises the types of enterprises the Town Council is highlighting, by stating that business in these sectors will be encouraged as part of a modification to bring the policy into line with the approach advocated by the Secretary of State.

#### **Recommendation**

***In the first sentence, delete “of the following types” and after “enterprises” insert “particularly those within the following types”.***

#### **Policy SAX4: Community services**

73. The District Council, in its Regulation 16 representations, questioned whether this policy actually adds anything to Local Plan Policy SCLP 8.1. The Town Council, in its response to my Initial Comments accepted that there were no local circumstances that would justify the neighbourhood plan taking a different approach, to the current planning policy which already covers community services in the town.
74. I will therefore be recommending that the policy be deleted, as it constitutes unnecessary duplication of planning policy covering a particular topic, which is contrary to the Secretary of State’s policy as set out in paragraph 16 f) of the NPPF.

#### **Recommendation**

***That the policy be deleted.***



### Policy SAX5: New community facilities

75. This is a supportive policy, covering new and improved community facilities. It differentiates between what it describes as essential and desirable community infrastructure although there is no difference in how such proposals are to be treated – they are all to be supported.
76. The policy makes reference to indoor sports and leisure provision within the garden neighbourhood. There are no requirements set out in the Local Plan's Policy SCLP 12. 29 that the indoor sports and leisure provisions are required to be provided within the Saxmundham Town Council's part of the garden neighbourhood. As I will be proposing the deletion of Policy SAXGN3, in the interest of consistency, I propose to remove the reference to the garden neighbourhood and Policy SAXGN3 from this policy.
77. I am satisfied that the locational criteria are sensible.

#### **Recommendations**

**Delete the headings "Essential Infrastructure" and "Desirable Infrastructure"**

**In i) delete all text after "town"**

**In the final paragraph, delete the rest of the sentence after "allotments"**

### Policy SAX6: Improving connectivity

78. Again I consider this is an eminently sensible policy which seeks to explicitly support the integration of new development with routes within and into the town. The policy has now been proposed for amendment by the Town Council to reflect the removal of the garden neighbourhood specific policies. I consider that it is acceptable for the policy to refer to major new development to the south of the town as that is not specific to the garden neighbourhood and reflects the Local Plan allocation and I will make it explicit that it only relates to land within the plan area.
79. I propose to adopt all of the proposed modifications put forward by the Town Council, with the addition of my modifications restricting the scope of the policy and also accepting the caveat suggested by East Suffolk Council relating to the segregated cycleway beyond the cemetery and its other suggestions which have been accepted by the Town Council.

#### **Recommendations**

**The modified text put forward as Proposed Modifications by the Town Council be incorporated in the document, with the following additions to the policy**

- **At the end of the new third paragraph insert "in so far as it relates to works within the plan area"**
- **In the fourth paragraph after "green corridors" insert "capable of"**
- **In the new sixth paragraph, after "cycle connections" insert "within the plan area"**

- ***At the end of i) insert “acknowledging that a segregated cycle path may not be achievable within highway land beyond the cemetery.”***
- ***In iii b) delete “which is necessary”***
- ***In v) insert at the start “Consider opportunities to explore”***

### **Policy SAX 7: Public rights of way**

80. I am happy to accept the Proposed Amendments put forward by the Town Council which improves the clarity and utility of the policy and which reflect national guidance.

#### **Recommendation**

***The modified text put forward as Proposed Modifications by the Town Council be incorporated in the document including the revised wording of the policy.***

### **Policy SAX 8: Parking provision**

81. The District Council questioned whether this policy adds any value to Local Plan Policy SCLP 7.2. I am satisfied this policy can reflect the community's aspirations, particularly when it comes to the location and design parameters when parking areas are proposed.

82. I did question whether the Town Council had a dimension in mind when it was referring to “garages being of a size to accommodate and provide easier access to a range of modern vehicles”. Its response referred to the figure of a minimum of 2.9 m wide and a length of 4.95 m. It states that this should allow for driver's door clearance, passenger door clearance and also accommodate with mirrors. In order to provide clarity as to the expectations of the policy, I recommend these dimensions are inserted into the policy as minimum dimensions.

83. The policy refers to the parking standards of East Suffolk Council, but it has advised me that the parking standards are actually those of Suffolk County Council. I will propose that amendment in the interest of clarity.

84. The policy includes reference to, *wherever possible*, parking spaces are to be permeable, however Local Plan Policy SCLP 7.2 *requires* parking areas to incorporate permeable surface materials.

85. I do not consider it reasonable for developers to have to provide external electric bicycle charging points on their housing developments. The requirement to provide electric charging points at new houses for electric cars is now a matter that is covered by Part S of the Building Regulations. I will be recommending that this part of the policy be deleted.

#### **Recommendations**

***In the first paragraph replace “East Suffolk Council” with “Suffolk County Council”.***

***In the last sentence of the “Residential parking” paragraph, delete “where possible” and replace “should” with “will be expected to”.***

***In the third paragraph, replace “of a size” with “a minimum of 4.95m in length with a width of at least 2.9m in order”***

***Delete the paragraph entitled “Electric charging points”***

***In the final paragraph delete “Garden Neighbourhood and the”***

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

86. The first requirement of the policy is that proposals will need to meet the criteria set out in Policy SAX 1. That policy will apply, in any event to all new development that takes place within the parish, as are all policies which are relevant to any specific proposal. I will recommend that the first paragraph be deleted as unnecessary duplication.

87. I will also clarify that proposals will be expected to meet all the criteria set out in a) to f).

#### **Recommendations**

***Delete the first paragraph***

***Insert “and” at the end of a) to e)***

### **Policy SAX 10: Housing mix**

88. It is entirely appropriate for a neighbourhood plan to seek to specify the housing mix which applicants are expected to comply with, so that new development meets the housing needs of the town, so long as that need has been established by evidence. This is recognised by the Local Plan in Policy SCLP 5.8.

89. However, in this case, there has been no housing need survey conducted. As the Town Council has confirmed the policy is based on community preferences, not evidence-based housing need. The District Council does set out its requirements in Table 5.1 of the Local Plan for 41% of new dwellings to be either one or two bed units. There are also separate requirements for specialist housing and elderly person units.

90. I do not consider this policy actually adds any local-based evidence to justify a different housing mix for Saxmundham when compared to the rest of the district.

91. I consider the final paragraph is a worthwhile expectation which will help deliver sustainable development. I would recommend it to be retained but that would require the retitling of the policy.

#### **Recommendations**

***Retitle policy “Tenure blind Housing Development”***

***Delete the first two paragraphs.***

### **Policy SAX 11: Historic town centre and conservation area**

92. I have no concerns regarding this policy except, as was discussed at the hearing, there would be a benefit to cross reference in the policy to the proposals in the High Street masterplan as well as the guidance in the Design Guidelines and Code for the Neighbourhood Area. The District Council has suggested that the policy would be better to reference the area being *preserved* not *protected* and I will reflect that in my recommendations.

### **Recommendations**

***In the first paragraph, replace “protected” with “preserved”***

***After the second paragraph insert a new paragraph:***

***“All proposals should have regard to the advice contained within the Design Guidelines for the Neighbourhood Plan Area as set out in Appendix X and where relevant The Concept Masterplan for the High Street”.***

***Delete the final paragraph of the policy.***

### **Policy SAX 12: Non-designated heritage assets**

93. I am satisfied that the evidence justifies the inclusion of these 15 sites as non-designated heritage assets.

94. The policy requires development proposals should avoid harm to these heritage assets. That is not consistent with the approach advocated by the Secretary of State as required in paragraph 197 of the NPPF which requires that the scale of any harm or loss should be weighed against the significance of the non-designated heritage assets. I will be recommending an appropriate modification which is a lower threshold than for a designated heritage asset.

95. A question was raised as to whether the United Reformed Church designation is merely the building or should include the graveyard. As the latter is identified in the Suffolk Monuments Record, I will clarify that the designation includes the whole site.

### **Recommendations**

***Amend “1”. to read “The United Reformed Church, Chapel Road, including its graveyard”***

***Delete the second and third paragraphs and replace with “Development proposals affecting these non-designated heritage assets will be judged having regard to the scale of any harm or loss to their significance which may include its setting and relationship to its immediate surroundings and the contribution it makes to the character of the local area.”***

### **Policy SAX 13: Gateways, views and the landscape setting of Saxmundham**

96. I have no concerns regarding all except one of the seven identified viewpoints. The only viewpoint which I cannot support is View 6, which is a viewpoint on a bend in Clayhill Road, which lies in the adjacent parish and includes land in the foreground of the vista which is outside the Saxmundham neighbourhood area. I will be recommending that this viewpoint be deleted from the policy.

97. The second paragraph refers to proposals that adversely affect an *important public local view*. This is different from general landscape policies as set out in the first paragraph. It appears these are also different to the *identified important local views* which are specifically listed. These important public

local views are not identified. I can see no value in differentiating between the two categories especially as decision makers will not know what views fall into the former category. It will make the intentions clear if the policy is explicit that this is the six viewpoints which enjoys particular public support and hence protection.

98. The final element of the policy seeks to enhance of all entrances to the town which it refers to as “green gateways”. I have no concerns with the intention of this part of the policy, though it should be noted that some of the green enhancements are likely to constitute landscaping and planting, which would not ordinarily require planning permission.

99. I will also recommend the insertion of the following plan which shows the 4 gateways as the map in the submission document only shows three gateways.



### Recommendations

***In the second paragraph, replace “an important public local view” with “the following important local views”***

***Delete the title “Important Local Views” and the third paragraph (while retaining the numbered views 1 to 5 and 7).***

***Delete view 6 and amend Figure 22 accordingly.***

***Replace Figure 23 with the map shown above***

### Policy SAX 14: Protection and enhancement of natural assets

100. The District Council is suggesting that the policy should be reviewed in the context of Local Plan Policy SCLP 10.1 which does not refer to a specific percentage of net biodiversity gain. The neighbourhood plan is however not requiring them to submit the stated 10% net gain, which is coming in at a national level, when it is enacted through this supplementary legislation required to trigger the relevant powers set out in the Environment Act. The policy is merely supporting those developments which do deliver 10% minimum biodiversity gains.

101. I believe that the reference to the mitigation hierarchy is consistent with national policy covering the natural environment as set out in the NPPF.

102. I am satisfied with the policy does meet basic conditions.



## Policy SAX 15: Community gardens and allotments

103. The community garden at the former Fromus Centre is also to be protected by virtue of its identification as a local green space in Policy SAX 16. However that would not offer protection as to its community garden status as it only means that it would be covered by policies which are consistent with development in the Green Belt. I therefore consider that the two policies have different purposes.
104. I do have concerns regarding the ambiguity as to the threshold is for what constitutes *major residential development*. If it was the same definition as used by the Town and Country Planning (Development Management Procedures) Order 2015, which is development of over 10 units, the requirements to make appropriate on-site provision will, in my opinion, be unduly onerous and impractical, especially on smaller schemes. The wording of the policy is ambiguous in that it says that the schemes for “new major residential development within or partly within Saxmundham should make provision for a proportionate area for a community garden”. Such a description appears to be relating to the garden neighbourhood and I note that Policy SAXGN2, in criteria (vi) one states “new allotments and/or community gardens should be provided within the new neighbourhood”. I therefore am assuming that the requirements have the garden neighbourhood in mind in seeking the provision of new allotments or community garden.
105. I note that Local Plan Policy SCLP 12.29 does not make any requirements for community gardens or allotments within its requirements. However Policy SCLP 8.3 does refer to proposals for new allotments to be alongside masterplans for inter alia new garden neighbourhoods. In view of my proposals to remove reference to the SSGN from the neighbourhood plan, I will, instead, recommend that these facilities should be strongly encouraged for any *large-scale housing development* which takes place in the town, which could form part of the green infrastructure at the masterplanning stage. This could then allow management mechanisms to be put in place for future ownership or management as well as requirements that implementation takes place at an appropriate stage of the site development.

### **Recommendation**

***In the second paragraph replace “major” with “large scale”, delete within or partly within Saxmundham” and insert “should be strongly encouraged to” before “make”.***

## Policy SAX 16: Green Spaces

106. The plan proposes 10 areas of local green space and the respective justification showing for what reasons the spaces are demonstrably special to the local community, as required by paragraph 100 of the NPPF, are set out in Appendix E of the plan.

107. However the policy is silent as to what the implications of the LGS status are for development proposals that affect these areas. I will recommend the policy should make reference to the criteria set out in Paragraph 103 of the Framework.
108. The District Council has pointed out in its Regulation 16 submission that in its view that the wording of the proposed designation of SANG is not in general conformity with Local Plan Policy SCLP 12.29 (v), which allocates the land for “open space and SANG”. This can be rectified by amendments to the wording of the neighbourhood plan policy which can allow the protection of the existing uses of the land “where that complements the delivery of open space and SANG.”

### **Recommendations**

***At the end of the first sentence after “(Figure 24)” insert “where any proposals will be judged against the requirements which rule out development unless there are very special circumstances.”***

***In the final paragraph before “SANG” insert “open space and” and at the end of the sentence insert “whilst allowing for the retention of the existing uses of the land where it complements the delivery of the open space and the SANG”.***

### **Policy SAXGN 1: Connecting the garden neighbourhood**

109. In the proposed Modifications put forward by the Town Council following the hearing, the proposal was to retain a separate Chapter 12 dealing with the Garden Neighbourhood but without any policy. Whilst the policy has been deleted and certain paragraphs, nevertheless it is clear that the chapter is still dealing with the totality of the garden neighbourhood, and in my view that means the neighbourhood plan is still addressing land that is beyond the Town Council boundary. Even without the policy, it appears to me that the Town Council is setting out its policy aspirations for the whole garden neighbourhood, which includes land outside the neighbourhood area.
110. The joint response from the two parties in the East Suffolk letter dated 21<sup>st</sup> February, identifies the remaining areas of disagreement between themselves. The Town Council wishes to retain the majority of the text and the two objectives for the Garden Neighbourhood as a separate chapter. The view of East Suffolk Council is that the benefit is limited and that some of the text would add more value if sited adjacent to generic policies or in earlier chapters which deal with the strategic context for the neighbourhood plan. Despite retaining its preference for the separate chapter, the Town Council has pragmatically agreed to either the deletion of most of the paragraphs, as duplication, or their relocation. The only area of outstanding disagreement is in relation to paragraph 12.7 and 12.8 where the Town Council believes that it is entitled to express its views on the future development of the garden neighbourhood.
111. My view is that these two paragraphs are setting out the Town Council's own ambition and vision for the garden neighbourhood, rather than being a

statement of planning policy, which happens to be consistent with the provisions in the adopted local plan, and the retention of the two paragraphs does not, in my view, seek to establish an alternative vision for the housing development or purport to create planning policy for the garden neighbourhood. As such I do not consider that it breaches any of the legal tests. I believe the two paragraphs should sit along with the agreed relocation of paragraphs 12.3 and 12.6, to come after paragraph 1.12.

112. I also agree with the other suggested repositioning of the retained paragraph 12.12 to sit with Policy SAX6, as a new paragraph after paragraph 9.12 and paragraphs 12.19 and 12.22 can be slotted in as additional text alongside Policy SAX5. I agree that with the changes to Policy SAX 6 it would be better for Objective SSGN2 to be relocated to the chapter dealing with Transport and Movement.
113. For the reasons stated above, I do not consider that Objective SSGN1 should be retained as it is related to the masterplanning of the South Saxmundham Garden Neighbourhood.

#### **Recommendations**

***That the policy be deleted and paragraphs 12.1, 12.2, 12.4, 12.5, 12.9, 12.10, 12.13, 12.14 be deleted, paragraphs 12.3, 12.6, 12.7 and 12.8 to be inserted after paragraph 1.12. Paragraphs 12.11 and 12.12 to sit with Policy SAX 6 after paragraph 9.12 and paragraphs 12. 19 and 12.22 to be included with Policy SAX5. Objective SSGN 2 to be moved to Chapter 9.***

#### **Policy SAGN 2: Green infrastructure links**

114. This policy along with the supporting text is recommended for deletion for the reasons set out earlier.

#### **Recommendation**

***That the policy and paragraphs 12.15 to 12. 18 be deleted.***

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

115. Again, this policy is recommended for deletion as is most of the text. I do recognise that the revised paragraph 12.19 and 12.22 could be relocated to be inserted after paragraph 8.13 in the generic Community Facilities section of the document.

#### **Recommendation**

***That the policy and paragraphs 12.20 and 12. 21 be deleted and paragraphs 12.19 and 12.22 be inserted after paragraph 8.13.***

#### **Policy SAXTC1: Town centre overarching strategy**

116. I have no concerns regarding this policy but as discussed at the hearing I will be recommending the policy should make specific reference to the High Street Concept Masterplan.

#### **Recommendation**

***Insert a new second paragraph to the policy***



***“Proposals should have regard to the advice contained within the Concept Masterplan for the High Street as set out in Appendix XXX”***

#### **Policy SAXSA1: Station Area Opportunity Zone**

117. I consider this to be an imaginative example of a neighbourhood plan policy proposing a positive regeneration over this important area of the town. Whilst some of the works could be initiated by the Highway Authority, nevertheless some of the proposals could similarly be driven forward as a mixed-use redevelopment scheme(s), guided by a comprehensive masterplan but could potentially, be implemented on a piecemeal basis. This policy will provide a framework for such a development strategy.

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

118. In order to coincide with the map in Figure 30, I recommend the wording should refer to Site 1 and Site 2, rather than Zone 1 and Zone 2.

#### ***Recommendation***

***Rename “Zone 1” as “Site 1” and “Zone 2” as “Site 2”***

#### **Policy SAXFS1: Fromus Square Opportunity Zone**

119. Again this policy is setting out the community’s aspirations for this key to the centre site by stating what proposals would be acceptable in what is a key town centre site.

#### **Policy SAXFC1: Former Fromus Centre Site and Community Garden Opportunity Zone**

120. I have no comments to make on this policy.

### **The Referendum Area**

121. If I am to recommend that the Plan progresses to its referendum stage, I am required to confirm whether the referendum should cover a larger area than the area covered by the Neighbourhood Plan. In this instance, I can confirm that the area of the Saxmundham Neighbourhood Plan as designated by East Suffolk Council on 29<sup>th</sup> August 2017 is the appropriate area for the referendum to be held and the area for the referendum does not need to be extended.

### **Summary**

122. I congratulate Saxmundham Town Council on reaching a successful outcome to the examination of its neighbourhood plan.

123. It is clear that a huge amount of hard work has gone into this plan by volunteers on behalf of the local community and I am pleased to recognise

their sterling work. I have been impressed by their professionalism exhibited throughout.

124. I appreciate the frustration regarding the fact that the neighbourhood plan could not provide the additional local perspective on the masterplanning of the garden neighbourhood. This clearly is an important development that needs to be carefully planned so that it becomes not just a community in its own right but also an integral part of the town which is properly integrated both in terms of facilities and connections. The issue that this examination has had to grapple with is a matter of historic boundaries and their relationship with the second largest local plan allocation in East Suffolk Council- Suffolk Coastal Local Plan area.
125. To conclude, I can confirm that my overall conclusions are that the Plan, if amended in line with my recommendations, meets all the statutory requirements including the basic conditions test and that it is appropriate, if successful at referendum, that the Plan, as amended, be made.
126. I am therefore delighted to recommend to East Suffolk Council that the Saxmundham Neighbourhood Plan, as modified by my recommendations, should proceed, in due course, to referendum.

JOHN SLATER BA(Hons), DMS, MRTPI, FRGS  
John Slater Planning Ltd  
16<sup>th</sup> March 2023

# APPENDIX

## Saxmundham Neighbourhood Plan

### Proposed Post Hearing Modifications from Saxmundham Town Council following the removal of Policies SSGN1-3.

#### Extract from Chapter 1

1.10 The Saxmundham Neighbourhood Plan is there to ensure that development takes place in an appropriate way for the parish. It has been positively prepared, with the purpose of supporting and managing Saxmundham's growth, not preventing it. In practice, higher level planning documents such as the Adopted Suffolk Coastal Local Plan cannot feasibly deal with all of the issues particular to every town and village across the entire district, whereas the Neighbourhood Plan can by providing additional details which reflect specific local circumstances and conditions. Whilst many residents felt that the amount of growth proposed in the Local Plan for Saxmundham was excessive, it is recognised, now the Local Plan is approved, that the Neighbourhood Plan has the responsibility to ensure that growth is well managed and beneficial, and in accordance with the Local Plan.

1.11 The Neighbourhood Plan provides clarity, through its policies, on what will be expected from development proposals in the parish, ~~including those in the South Saxmundham Garden Neighbourhood~~, and ensures that the impact of development is anticipated and planned for in Saxmundham. A Neighbourhood Plan is a significant document and will carry legal weight so that developers have to take note when considering future developments in the parish. Policy SCLP12.1 (Neighbourhood Plans) of the Local Plan sets the framework for housing growth in Neighbourhood Plan areas within the District.

1.12 The Neighbourhood Plan Area includes the relevant areas (within Saxmundham) of the South Saxmundham Garden Neighbourhood site which is defined and allocated in the Local Plan (policy SCLP 12.29, and see below), and is to be delivered through a masterplan approach brought forward "through landowner collaboration and community engagement". Though an important part of the site presently falls within the parish of Benhall, the whole development adjoins the existing urban settlement and will have a major relationship with and impact on Saxmundham in its roles as "market town, employment and service centre" (see SCLP 12.28). To ensure that the Plan promotes the achievement of sustainable development, in all of its dimensions, it is vital that the new community is well integrated into and linked with the existing community, and that its development is coherent with the overall (physical and social) fabric and development of the town. The Neighbourhood Plan's policies supplement, within its area, the strategic policies in the Local Plan, ~~including the Garden Neighbourhood~~, but are (and are required to be) consistent with them.

1.13 This is the Submission version of the Saxmundham Neighbourhood Plan, prepared for submission to East Suffolk Council . This follows pre-submission consultation which took place during the seven-week period from 5th November to 22nd December 2021.

Local residents, businesses, and statutory agencies had the opportunity to comment on the draft Plan. 91 responses were received from individuals together with the statutory consultees. All comments have been collated and considered. The Plan has been amended for submission to East Suffolk Council in April 2022.

## Accompanying supporting documents

1.14 When the Saxmundham Neighbourhood Plan is submitted for independent examination, it will also be accompanied by the following documents:

- Basic Conditions Statement – outlines how the statutory basic conditions have been met.
- Consultation Statement – outlines how and when the public have been consulted on the content of the Plan.
- Strategic Environmental Assessment Screening Report – to determine whether the Neighbourhood Plan requires a full Strategic Environmental Assessment.
- Habitat Regulation Screening Report – identifies any potential impacts on protected species or habitats.

1.15 In addition, the following two supporting documents, which have provided technical input in developing some of the Neighbourhood Plan's policies, are included as Appendices, their guidance submitted to be drawn upon as set out in the relevant policies. These relate to the appropriate in the future master planning of the South Saxmundham Garden Neighbourhood and High Street/Town Centre, and in design of future development, throughout the parish both within the Garden Neighbourhood and some specific guidance for the in the town centre and Neighbourhood Plan area as a whole:

- Saxmundham Design Guidelines and Code for the ~~Garden Neighbourhood site and the~~ Neighbourhood Plan Area – undertaken by consultants AECOM in July 2021. A focus on design elements to inform policy making and application determination across the Neighbourhood Area.
- Saxmundham Concept Masterplans for the High Street ~~and Garden Neighbourhood~~—undertaken by consultants AECOM in July 2021. Notional masterplans used to inform discussions and policy development in relation to the ~~Garden Neighbourhood and the~~ Town Centre.

## 6. Parish wide: Design principles

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### High quality design

6.1 Among the key determinants of whether any new development, irrespective of scale or use, is successful is how well it is considered to integrate with its surroundings. Matters such as design, materials, form and massing, the impact on local character, layout and scale are the most common issues that will cause the local community concerns about any proposed new development.

6.2 If a community believes that it has been involved in and been able to influence the design of a development at an early stage, the higher the likelihood that the development will be considered to be acceptable.

6.3 Whilst to an extent design and impact on local character are subjective judgments, these can be influenced by breaking design elements down into component parts and attempting to address them. Whether a proposed new development is acceptable and appropriate and relates well to its surroundings, is one of the most common judgments to be made, yet there is often very little evidence or guidance to assist local people (or decision makers) in making that judgement.

6.4 A key purpose of the Neighbourhood Plan is not only to help influence the designers and proposers of development at an early stage of formulating their proposals, but also to help promote an understanding of what elements make up the character of the area and what constitutes good design that respects local character.

6.5 Government guidance places considerable emphasis on achieving well-designed places and this has been reinforced in the most recent revision of the National Planning Policy Framework (NPPF) in July 2021. Paragraph 126 of the NPPF describes it as fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work, and helps make development proposals acceptable to communities. Effective engagement between applicants, communities and local planning authorities is essential.

6.6 Paragraph 127 of the NPPF states 'Design policies should be developed with local communities so that they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics.' Neighbourhood Plans can play an important role in identifying the special qualities of an area and how they should be reflected in development.

6.7 In addition, the NPPF makes clear that local planning authorities should ensure that visual tools such as design codes and guides are used to inform development proposals to provide maximum clarity about design expectations at an early stage and reflect local character and preferences.

They should

provide a framework for creating high-quality places, with a consistent and high-quality standard of design to inform development proposals. It also makes clear that the level of detail and degree of prescription within design codes and guides should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety where this would be justified.

6.8 Design coding is one tool available to local planning authorities, communities, and developers to define and deliver design quality, in addition to design guides, planning briefs, heritage characterisation studies, standards and masterplans as set out in the NPPF and planning practice guidance. A design code is a set of simple, concise, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for the physical development of a site or area.

6.9 The Government is heavily advocating the use of design codes and expects all local planning authorities to prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code and which reflect local character and design preferences.

6.10 The Town Council commissioned consultants AECOM to produce Design Guidelines and Codes ~~not only for the Neighbourhood Plan Area. Garden Neighbourhood but also for the rest of the parish.~~ This work was completed in July 2021 and is ~~contained in Appendix X of this a supporting document to inform the Neighbourhood Plan (see paragraph 1.15 above).~~ The Design Code reflected a detailed analysis of the local character of the parish, developed some strategic design guidelines and identified a palette of materials which should influence the design of future development. The Code's principles have informed and are reflected in Policy SAX1, and its more detailed guidance should be drawn upon as appropriate in the design of future development, ~~both within the Garden Neighbourhood and~~ in the Neighbourhood Plan area as a whole. In addition, the report provided specific guidance to be used by the Town Council when assessing and responding to consultation in future planning applications for new development.



Figure 16: Design Guidelines and Codes for the ~~Garden Neighbourhood site and the Neighbourhood Plan area.~~ (Amended cover to be included)

6.11 The Neighbourhood Plan Household Survey conducted in June 2019 asked residents for their views on which design elements they considered to be important in future developments. 889 people responded to this question and 2107 preferences were expressed. The most supported concepts were 'highly energy efficient' (79 per cent of respondents) and 'landscaping of high visual and ecological quality' (57 per cent). In relation to house building style, 43 per cent express support for 'Traditional Suffolk', 18 per cent for 'Innovative design' and some support also for 'dementia friendly', 12 per cent. Further information on dementia friendly design can be found in the Royal Town Planning Institute Guide <sup>1</sup>

6.12 Given the increasing importance that both local people and national Government are placing on design, it is considered that achieving well designed places and promoting high quality design should also be fundamental to this Neighbourhood Plan and go to its heart. The Plan therefore sets out its key design principles at the beginning of the policies section, recognising that good design should be a theme that flows throughout the plan, and sets the tone for other policies to follow in terms of its importance for all new development of any scale, form or use. **Policy SAX1** below applies throughout the Neighbourhood Area, ~~including within the Garden Neighbourhood (in so far as parts of it fall within the Neighbourhood Area).~~

6.13 Suffolk County Council has also produced a range of guidance which may be helpful to prospective applicants when designing their proposals, These

- include:
- The draft Suffolk Design Streets Guide
  - Suffolk Guidance for Parking.
  - The Suffolk Flood Risk Management Strategy, particularly Appendix A.

<sup>1</sup> RTPI | Dementia and Town Planning: <https://www.rtpi.org.uk/practice/2020/september/dementia-and-townplanning/>

6.14 The criteria in the policy below are informed by the **Saxmundham Design Guidelines and Codes for the ~~Garden-Neighbourhood Site and the~~ Neighbourhood Plan Area** (July 2021). It is important that new development is not viewed in isolation and consideration of design and layout should be informed by the wider context, considering not only the buildings immediately adjacent but also the townscape and landscape of the wider locality all of which will contribute to the character of the area. The pattern of streets, spaces, building styles and types, materials and the natural environment will all help to shape the character and identity of a development, of any scale. Proposals for new development should take full account of the local context and innovative, eco- friendly and contemporary designs that add interest and embody the general ‘sense of place’ are encouraged.

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**SAX1: General design principles**

The design of all new development in Saxmundham should reflect the town's local distinctiveness and character and seek to enhance its quality.

Proposals should have regard to the advice contained within the Design Guidelines and Codes for the Neighbourhood Plan area as set out in Appendix X.

Proposals that incorporate eco-friendly, innovative or contemporary designs whilst respecting the architectural heritage and character of the area will be supported

Proposals for new development should accord with the following criteria, as appropriate:

- a. Respect the existing settlement pattern in order to preserve its character.
- b. Retain existing connections and ensure new connections integrate with existing paths, streets, circulation networks, as well as natural features such as tree groups, hedgerows, and public rights of way.
- c. Reinforce the established character of streets, greens, and spaces, where this provides a positive impact.
- d. Harmonise and enhance the existing settlement in terms of physical form and architecture.
- e. Retain existing natural and historic features within the new development.
- f. Respect surrounding buildings in terms of scale, height, form and massing.
- g. Adopt contextually appropriate materials and details.
- h. Incorporate necessary services and drainage without causing harm to retained features.
- i. Ensure all component elements of a development, e.g., buildings, landscapes and access routes, parking, open space, are well related to each other.
- j. Enable and support healthy lifestyles, especially where this would address health and well-being needs

Consideration should be given to the specific guidance contained in the policies for the relevant Opportunity Zones. See also Policy SAX11 which relate to the Conservation Area.

## Extract from Chapter 9

**Objective 3: To improve transport and safe accessibility for the people of Saxmundham by foot, bicycle, mobility scooter and public or private transport resulting in environmental and health benefits.**

9.10 Opportunities to encourage and facilitate the use of sustainable transport in particular walking and cycling should be maximised. Government guidance encourages development proposals to provide for high quality walking and cycling networks and supporting facilities such as cycle parking. Suffolk County Council has produced a

Green Access Strategy (2020-2030) <sup>2</sup>. This strategy sets out the council's commitment to enhance public rights of way, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.

9.11 Such networks should be comprehensive and provide not only for recreational routes but also for meaningful routes that can realistically be used for commuting to work or school. In addition, new routes should connect to the existing network and be suitable for use by people with disabilities and reduced mobility. New cycling and pedestrian routes should be safe, secure, and attractive, maximise the scope for pedestrians and cyclists and respond to the character of the area and any relevant design standards. See also ~~Policy SAXGN1 for more detail on connecting the Garden Neighbourhood and~~ **Policy SAXTC1** for the town centre/High Street.

9.12 Opportunities for improving connectivity between the town centre and the railway station (for commuting/business and recreational purposes) and also the town centre and the river frontage (for recreational purposes) should be given high priority.

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<sup>2</sup> Suffolk Green Access Strategy, <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-ofway/suffolk-green-access-strategy-2020-2030.pdf#:~:text=The%20Suffolk%20Green%20Access%20Strategy%20details%20why%20green,it%20can%20contribute%20to%20the%20council's%20corporate%20priorities.>



**SAX6: Improving connectivity**

Over the Plan period, opportunities will be sought to make the town safer and more accessible, and to contribute to the health and well-being of residents, through the provision of safe and attractive pedestrian and cycle routes, public rights of way and crossings, suitable for all users, in particular linking new and existing housing areas to the town centre and station. Development should maximise walking and cycling through its location and design.

New provision should be in the form of well-designed, attractive and safe to use routes (including appropriate lighting), and the enhancement of existing routes including making new connections and links where appropriate. New cycle linkages should be built to the standards set out in LTN1/20 Cycle Infrastructure Design.

Development that will improve connectivity for pedestrians, cyclists, and users with a mobility impairment, both within Saxmundham, and in and out of Saxmundham to neighbouring towns and villages will be supported.

New routes, including new public rights of way, should form a cohesive network for users and allow for access both within the town and also to the wider countryside, where opportunities should be taken to create green corridors connecting with neighbouring villages. New developments will be supported where they provide, or contribute to safe, convenient, and pleasant pedestrian and cycle routes to the town centre, to community facilities (schools, library etc) and also to the wider countryside.

Proposals that would improve connectivity between the town and the river frontage, including those that would provide for a comprehensive riverside walk, will be supported.

Where major new development is to take place to the south of the town, support is given for the following new 'indicative' pedestrian and cycle connections as shown in Figure X below:

- 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
- ii. **Between new development and the town centre (including supermarket area).** To be achieved through an improved cycle and pedestrian route via the existing bridge over the railway to South Entrance to provide easy and swift access to and from shops and facilities.
- iii. **Between new development and the surrounding residential areas and schools.** To be achieved via:
  - a. the existing footpath to the east of the school playing field (footpaths 12 and 15 Saxmundham), upgraded appropriately, and leading to and from Seaman Avenue and Mill Road, and
  - b. a new cycle and pedestrian route to the west of the school playing field which is necessary to forge a strong connection with the existing residential communities to the south and west of the Memorial Field

(Montagu Drive, Gilbert Road, Franklin Road, Drake Close, Mayflower Avenue and Lincoln Avenue) together with access to and from other residential areas beyond.

- iv) Upgrading of the existing public footpath (Saxmundham 19) between Benhall and Saxmundham, (where it runs along the B1121) to provide a safe cycle and pedestrian route between the settlements
- v) Indicative new footpath rail crossing over the railway to provide a safe and accessible connection for residents of all ages to the SANG and open space on the east of the railway and to Benhall.

See also **Policy SAXGN1, Appendix X Saxmundham Design Guidelines and Code for the ~~Garden Neighbourhood and the~~ Neighbourhood Plan Area.**

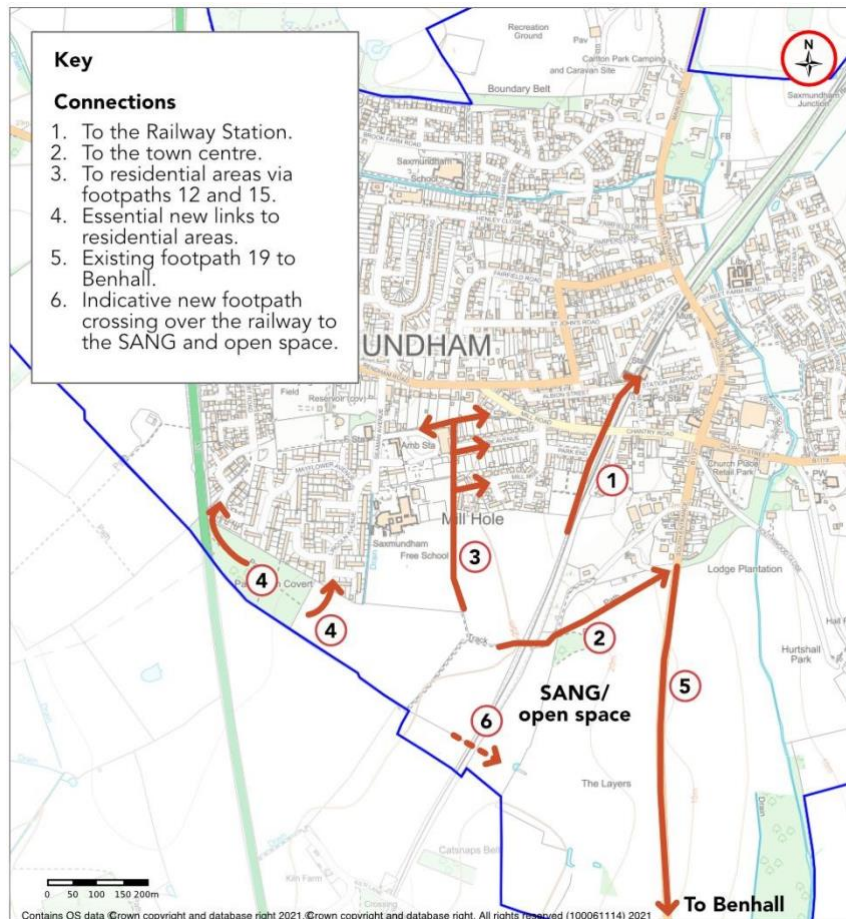


Figure X: Indicative Connections (source: Parish Online with own annotations). Blue line denotes Neighbourhood Plan Area boundary (replace essential with indicative in the key)

## Existing Public Rights of Way

9.13 The NPPF advises that planning policies and decisions should protect and enhance Public Rights of Way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails. Opportunities to improve facilities for walkers and cyclists in the parish would be supported.

9.14 Where development proposals are likely to affect an existing Public Right of Way, these should take account of its route and incorporate it into the overall layout of the scheme. Where this is not considered possible, this will need to be justified. Where Public Rights of Way may be unavoidably impacted or lost, appropriate diversions or new routes should be provided that are safe, equally accessible, and convenient for users.

9.15 Existing Public Rights of Way which are incorporated into new developments, including bridleways and footpaths, should be protected and enhanced. Enhancement can take the form of new routes, connections, improved surfaces and/or signage increasing access to the countryside and connectivity between communities.

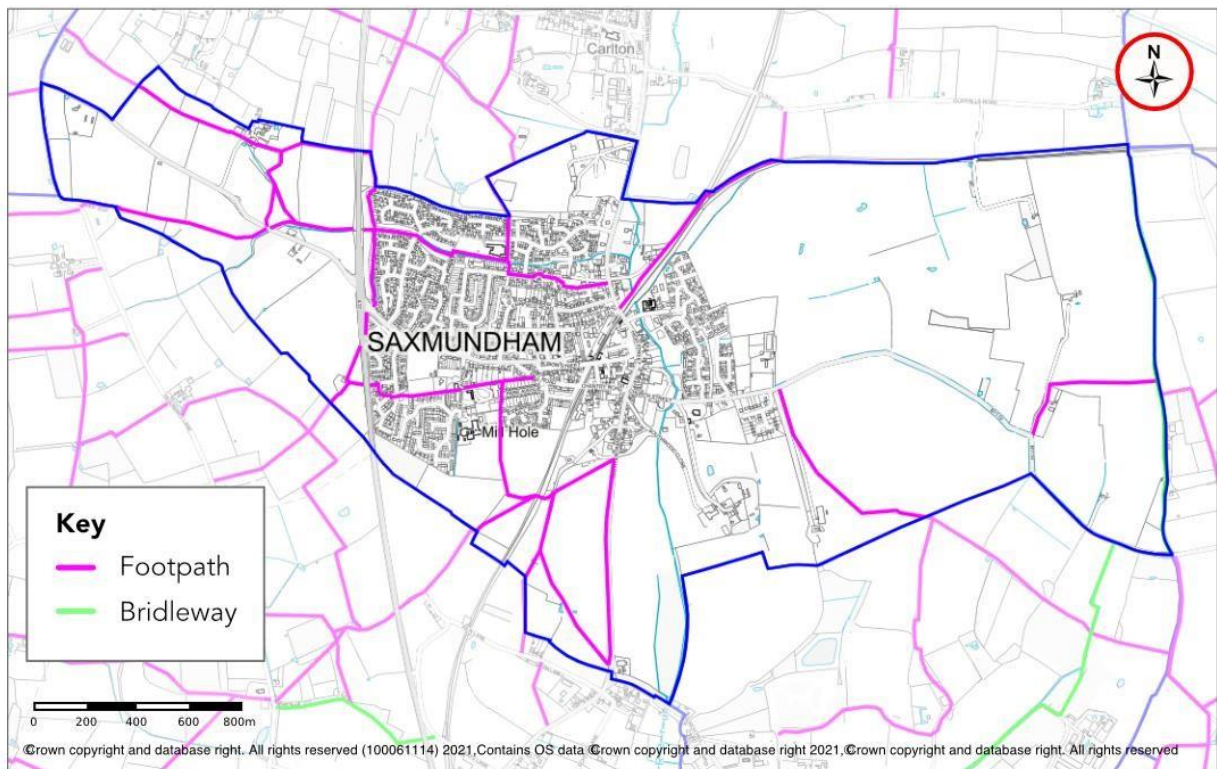


Figure 4XX8: Public Rights of Way in Saxmundham parish (source: Parish Online, with own annotations). Blue line denotes parish boundary.



**SAX7: Public Rights of Way**

Existing Public Rights of Way, including bridleways and footpaths, should be protected and enhanced to promote walking and cycling. Enhancement can take the form of new routes, connections, improved surfaces and/or signage increasing access to the countryside and connectivity between parts of the town.

Where new routes are to be provided and existing routes enhanced, careful consideration should be given to ensure their safety and attractiveness, for all users and for adjacent occupiers. Proposals should seek to minimise light pollution whilst remaining safe and attractive to users.

Public Rights of Way should be retained, except where it can be demonstrated that there is strong community support for it to be re-routed. Where Public Rights of Way are to be unavoidably impacted or lost, appropriate diversions or new routes will be provided that are safe and convenient for users.

See also ~~Policy SAXGN1.~~

## Extract from Chapter 12

## 12. Site specific: South

### Saxmundham Garden Neighbourhood

#### South Saxmundham Garden Neighbourhood

**Objective SSGN1: To create a high quality, well designed, distinctive new development in line with 'Garden City' principles which is valued by its residents and recognised as an asset to the Town.**

12.1 **Policy SCLP12.29** in the Adopted Suffolk Coastal Local Plan (SCLP) 2020, allocates 66.6 hectares of land as the South Saxmundham Garden Neighbourhood, the development of which is expected to provide an education led scheme of 800 dwellings, community facilities and employment land. The Garden Neighbourhood is envisaged to be an extension to the existing built-up area of Saxmundham; however, part of the allocation also extends into Benhall Parish to the south of Saxmundham.

~~12.2 The Saxmundham Neighbourhood Plan area covers the parish of Saxmundham only and therefore the following policies are applicable only to that part of the Garden Neighbourhood that falls within the Neighbourhood Plan area. The following policies seek to guide development of the Garden Neighbourhood within the parish of Saxmundham and their content has been informed in part by the AECOM Master Plan and the Design Guidelines and Codes for the Garden Neighbourhood (see also relevant area wide policies). As stated earlier, the AECOM Masterplan is a notional masterplan used as the basis for evaluating the impact the development may have on the town and the policies needed to mitigate the problems raised and to strengthen the advantages.~~

12.3 Local Plan **Policy SCLP12.29** provides the overarching allocation for the Garden Neighbourhood and sets out the key issues that will need to be addressed in order for the development to be brought forward successfully. The Local Plan places considerable emphasis on the need for the development to be delivered through a masterplan approach brought forward and informed by landowner collaboration and community engagement. Saxmundham Town Council believe that such a masterplan, produced with both the input of the landowners and through meaningful engagement with the community is essential to the ensuring that the development of the Garden Neighbourhood is a success, in its own right and for the town as a whole. The Neighbourhood Plan policies (consistent with the Local Plan's policies) seek to influence and shape proposals that come forward for the development of the Garden Neighbourhood through the collaborative masterplan process outlined in the Local Plan.

12.4 The Local Plan provides an indicative concept draft masterplan diagram that gives a broad indication of where various elements of the Garden Neighbourhood may be located. Within the parish boundary of Saxmundham, it is envisaged that there will be at least three areas of residential/mixed use development, areas of woodland, informal and formal open space, existing mature hedgerows, and tree belts and at least 3 pedestrian and cycle accesses from the town into the Garden Neighbourhood. The proposed community hub and employment areas together with additional residential and mixed-use areas would be located within Benhall parish. The indicative masterplan in the Local Plan assumes that the new primary school will be located within the residential/mixed use areas but does not give a specific parish location. However, apart from the allocation of the employment site to the west of the A12, and land to the east of the railway for green space/SANG purposes (and not for built development), the siting and layout of the new development is left for the collaborative masterplanning process outlined above.

~~12.5 This section of the Neighbourhood Plan aims to provide more detail to the Local Plan policy, provide input into the collaborative masterplan and identify specific land use requirements that will need to take place to enable the Garden Neighbourhood to come forward. This details in this section have been informed by community consultation undertaken as part of the development of the Neighbourhood Plan as well as the AECOM work in the 'notional' Masterplan and the Design Guidelines and Code.~~

12.6 Critical to the success of the Garden Neighbourhood will be its successful integration with the existing community of Saxmundham (and Benhall). In order to create a full sustainable Garden Neighbourhood consistent with the objectives of the NPPF, this integration needs to be:

- Physical – in terms of the relationship between the new development and the existing built-up area of the town, high quality connections – pedestrian and cycle – to promote easy, safe and quick access between the town and the development and also the development and the facilities of the town e.g., the town centre and the railway station.
- Environmental – in terms of high-quality green infrastructure connections and links between the Garden Neighbourhood and the town; design and layout of the Garden Neighbourhood to reflect local character.
- Social – A strong connection and interaction between the Garden Neighbourhood and the rest of the town, services to meet the needs of local people, provision of primary school and early years facilities, housing that provides for a mixed and balanced community and ensure integration and cohesion between new and existing communities.

12.7 Saxmundham Town Council believes that any future development in the Garden Neighbourhood site should take the name of the site literally and aim to create a rural countryside feeling for the area.

12.8 Thus, the vision for the site is to create a high quality, well designed, distinctive new development in line with 'Garden City' principles which is valued by its residents and recognised as an asset to the Town. The green infrastructure would contribute to this vision in the form of informal green spaces, parks, public squares, sports pitches, community gardens, large street trees, hedgerows and so on. There will be a strong connection and interaction with the existing settlement to the north.

12.9 This will be achieved through the adoption and implementation of the following key ~~development~~ principles for the area:

- a. the creation of a rural/countryside feel for the area where pedestrian and cycle movement are prioritised over vehicular movement.
- b. the provision of a wide range of green infrastructure including informal green spaces, parks, public squares, sports pitches, allotments or community gardens, the use of large trees and hedgerows.
- c. strong connections and access to and from the north of the area with the existing settlement of Saxmundham.



Figure 25: South Saxmundham Garden Neighbourhood, indicative draft masterplan from the Local Plan. Note: indicative draft masterplan assumes new primary school within the residential/mixed use areas (source: Area Specific Strategies, Suffolk Coastal Local Plan, Adopted September 2020).

## Connecting the Garden Neighbourhood

**Objective SSGN2: To successfully integrate – physically, environmentally, and socially – the new neighbourhood with the existing town and community of Saxmundham.**

12.10 The success of the Garden Neighbourhood, for its residents and for the town of Saxmundham, depends to a large degree on (a) how well it is physically accessible to and integrated with the town, offering seamless, easy-to-navigate routes, and (b) how well it provides for excellent connections and movement within the Neighbourhood. The development proposals for the Garden Neighbourhood (to be master-planned with full community engagement) are required to ensure that excellent connectivity is provided: (a) between the existing Town and the Garden Neighbourhood, and (b) within the Garden Neighbourhood itself.

12.11 Since the only vehicular access route to and from the Garden Neighbourhood to the existing town is indirect, via the A12, direct, well sign-posted pedestrian and cycle connections to the town (including town centre, station, residential areas) must be provided that are sufficient in number and of high

quality. Such links will also serve to further other aims, including promoting health and well-being.

## Connecting the Garden Neighbourhood to the existing town and community

12.12 Fundamental to the success of the development of the Garden Neighbourhood is to ensure that the local community can access existing town-based services and facilities as well as those which will be created over the plan period, e.g. the new primary school. At least three new and/or upgraded connections are ~~required-supported~~ (See Policy SAX6) – to the Station, the town centre, and the existing residential area to the north-west of the neighbourhood site. The development of the Garden Neighbourhood should facilitate access to public transport, ~~through a layout that maximises the catchment for bus or other public transport – rail travel in particular.~~

## Connections and movement within the Garden Neighbourhood

12.13 The creation of the Garden Neighbourhood provides the opportunity to encourage and facilitate use of sustainable transport, in particular walking and cycling, and so to promote exercise for health and well-being. Connections both within and into and out of the Garden Neighbourhood should create places that are safe, secure and attractive to users, in terms of their visual quality and which minimise the scope for conflicts between pedestrians, cyclists and vehicles and avoid unnecessary street clutter and respond to local character and design standards.

12.14 ~~Policy SAXGN1 below has been developed to take account of these issues.~~

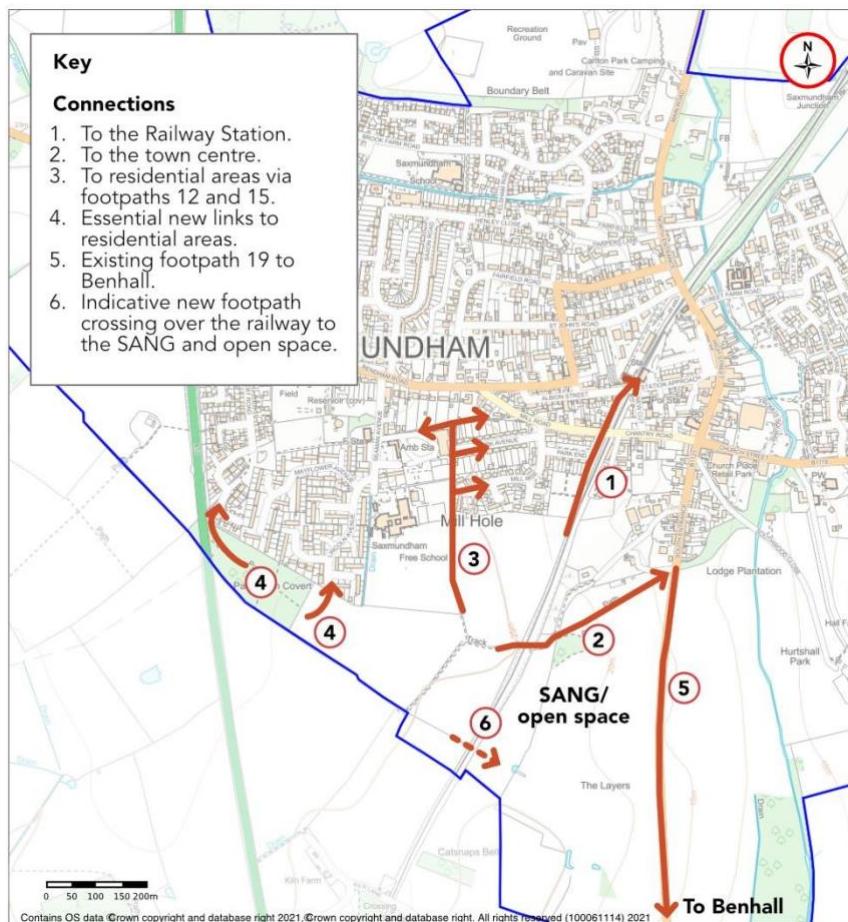


Figure 26: Connections  
(source: Parish Online with  
own annotations). Blue  
line denotes parish  
boundary Moved to SAX6



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

Development proposals for the Garden Neighbourhood will be expected to ensure that excellent connectivity, both between the existing town and the Garden Neighbourhood and within the Garden Neighbourhood itself, is provided for all users, including those with a mobility impairment.

Pedestrian and cycle movement between the Garden Neighbourhood and the existing town is prioritised over vehicular movement through the provision of connections, sufficient in number and of the highest quality. They must be convenient and direct in order to avoid use of the single vehicular access to the Garden Neighbourhood via the A12.

This provision will be in the form of well designed, attractive and safe to use (including appropriate lighting), new pedestrian and cycle linkages and the enhancement of existing routes including making new connections and links where appropriate. New cycle linkages to be built to the standards set in LTN 1/20 Cycle Infrastructure Design <sup>3</sup>Such links will be implemented at the outset of the development (Phase 1) prior to the occupation of new dwellings.

#### **Connecting the Garden Neighbourhood to the existing town and community**

New and enhanced pedestrian and cycle connections will include:

- i. Connection between the Garden Neighbourhood and the railway station. This will 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
- ii. Connections between the Garden Neighbourhood and the town centre (including supermarket area). This will be achieved through an improved cycle and pedestrian route via the existing bridge over the railway to South Entrance to provide easy and swift access to and from shops and facilities.
- iii. Connections to the surrounding residential areas and schools. These will be achieved via:
  - a. the existing footpath to the east of the school playing field (footpaths 12 and 15 Saxmundham), upgraded appropriately, and leading to and from Seaman Avenue and Mill Road, and
  - b. a new cycle and pedestrian route to the west of the school playing field which is necessary to forge a strong connection with the existing residential communities to the south and west of the Memorial Field (Montagu Drive, Gilbert Road, Franklin Road, Drake Close, Mayflower Avenue and Lincoln Avenue) together with access to and from other residential areas beyond.

#### **Public Transport**

<sup>3</sup> Cycle infrastructure design (LTN 1/20), <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>



- iv. The site access will need to be able to accommodate buses to easily serve the site including bus linkages to the town centre and supermarket area. New bus stops should be provided within easily accessible locations.

### **Connections and movement within the Garden Neighbourhood**

New development within the Garden Neighbourhood, is expected to come forward through a master planning process involving landowner collaboration and community engagement as identified in the Local Plan. Proposals must promote the use of sustainable transport modes, as appropriate, including for exercise for health and well-being, as set out below:

- v. The street layout should integrate existing public rights of way with new green links to encourage walking and cycling within the area, thereby reducing the reliance on cars within the Garden Neighbourhood.
- vi. A central cycle avenue running through the site, would help to filter traffic and vehicular movement.
- vii. In addition to other cycleways referred to above, the provision of a circular green route is encouraged around the site as defined in the Local Plan, for use by cyclists and walkers.
- viii. Good quality walking and cycling links to and from Benhall, utilising existing Public Rights of Way shall be created or improved.
- ix. The existing public footpath (Saxmundham 19) between Benhall and Saxmundham, (where it runs along the B1121 within the hedgerow along the eastern boundary of the Garden Neighbourhood site), shall be upgraded to provide a safe cycle and pedestrian route between the settlements (also forming part of the circular green route at (vii) above).
- x. The existing rail crossing bridge shall be retained and upgraded for safe cycle and pedestrian use.
- xi. A further suitable rail crossing point (bridge) should be considered to the south of the site to provide a safe and accessible connection for residents of all ages to the SANG on the east of the railway and to Benhall (this could be sited within the Neighbourhood Plan Area).
- xii. Existing public rights of way to be preserved and enhanced to promote walking and cycling.

Where new routes are to be provided and existing routes enhanced, careful consideration should be given to ensure their safety and attractiveness, for all users and for adjacent occupiers. Proposals should seek to minimise light pollution whilst ensuring that routes are safely lit and attractive to users.

Note: this policy only applies to the parts of the South Saxmundham Garden Neighbourhood that fall within the Saxmundham Neighbourhood Plan area. See also **Policy SAX6 Improving Connectivity.**

### **Physical Infrastructure**

12.15 It should be noted that off-site infrastructure requirements including health provision and police facilities, will be required through developer contributions. Confirmation of foul sewerage and water capacity will also be required. This is referred to in the Local Plan (**Policy SCLP12:29**).

### **Green infrastructure**

12.16 The successful integration of the Garden Neighbourhood into the wider area and its acceptance by the wider community will no doubt be influenced by how well it is considered to live up to its name e.g. 'Garden' and also how engaged the community has been in the collaborative masterplanning process. A key indicator of this will be the quality and quantity of green infrastructure that is provided both within and at the edge of the Garden Neighbourhood development.

12.17 New Green links will be required along the edges of the site to create a green buffer, mitigate any noise disturbance and connect with surrounding assets (countryside, SANG, existing settlement, High Street). The Local Plan proposes that the entire area east of the railway is for 'open space' and Suitable Alternative Natural Greenspace (SANG) (possibly with some part in existing agricultural use) in order to have a positive impact on the environment. Footpaths and signage within the SANG will facilitate movement and attract people. Any new green links will need to be located to encourage walking and cycling around the area reducing the reliance on cars.

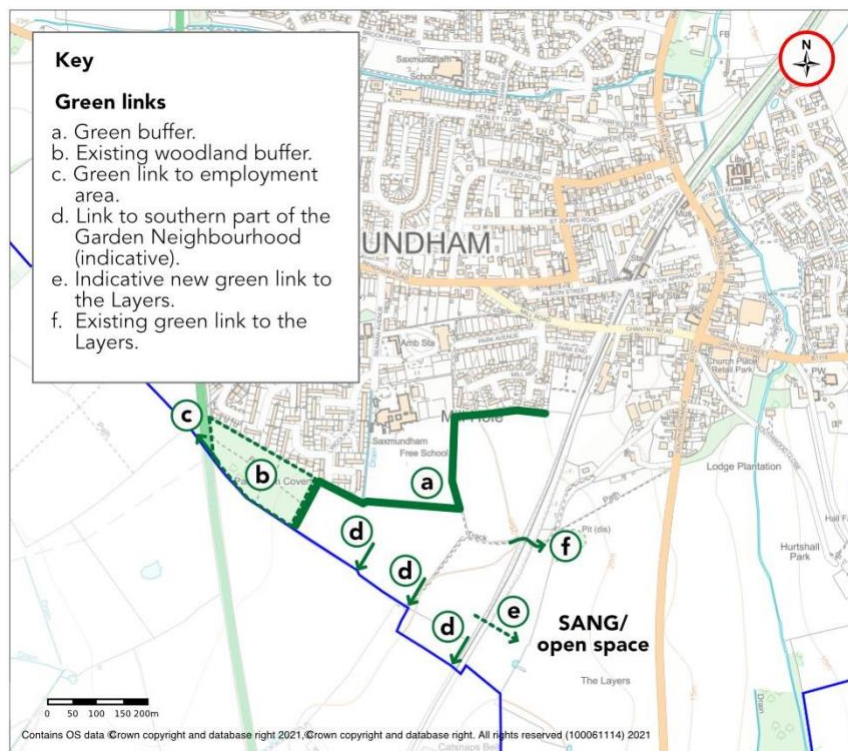


Figure 27: Green links (source: Parish Online with own annotations). Blue line denotes parish boundary. Diagram to be removed

12.18 A range of green spaces will need to be provided including formal parks, play areas, sports fields, public square, informal greens. All will create a system of different types of green spaces that meet the needs of a wide range of people; shelters, public toilets and other facilities may need to be investigated in some specific green spaces; and a circular green route around the site would enhance the rural countryside 'feel' and promote walking and cycling.

**SAXGN2: Green infrastructure links**

The provision of high quality, well designed and accessible green links, spaces and green infrastructure shall be provided in order to achieve a sustainable and integrated new neighbourhood.

New development within the Garden Neighbourhood is expected to come forward through a master planning process involving landowner collaboration and community engagement as identified in the Local Plan. Development proposals which meet the following criteria will be supported:

- i. — Green infrastructure links which connect to the wider countryside, to the west to the employment area, east to the Layers and to the wider countryside.
- ii. — A well landscaped 'green zone' to be created along the northern boundary of the Garden Neighbourhood between the existing and new communities and to safeguard amenity between existing and new properties.
- iii. — The area east of the railway line including The Layers is identified for the provision of open space and an appropriate area of well designed Suitable Alternative Natural Greenspace (SANG), to mitigate the potential impacts of recreational disturbance on the Special Protection Areas (see **Policy SAX16**). The land east of the railway, defined for these purposes, should be delivered as an integral part of the garden neighbourhood. The retention of existing uses on a part of the land to the east of the railway is supported, within this framework, where it is compatible with and complements the delivery of open space and SANG.
- iv. — All existing trees, hedges, and hedgerows to be retained and incorporated into the design and layout of proposals, in so far as is reasonably practicable.
- v. — Provision of significant landscaped area along the western boundary of the site, adjacent to the A12, to provide a soft landscaped edge to the development and the opportunity for recreational pedestrian routes and noise mitigation.
- vi. — New allotments and/or community gardens should be provided within the new neighbourhood.
- vii. — The inclusion of 'green corridors' to allow the passage of wildlife through and within the neighbourhood.

Note: this policy only applies to the parts of the South Saxmundham Garden Neighbourhood that fall within the Saxmundham Neighbourhood Plan area.

## Community facilities

12.19 A range of community facilities are highlighted in the Local Plan policy as needing to be delivered to support the growth of the Garden Neighbourhood. The Local Plan provides an indicative draft masterplan layout. The proposed community hub (or local centre) is shown within Benhall parish but close to the parish boundary. It should however relate well to and be easily accessible from the rest of the entire development if it is to function successfully as a hub. The hub's location, and that of the primary school, should be decided within the

~~masterplanning process referred to above. The local centre could be located next to the main entrance to the site welcoming visitors and residents. It will need to offer a variety of shops, open spaces and visitor's parking attracting people from the new and existing community as well as from the employment area. In such a location it can be easily seen from the main road (A12) also attracting drivers passing by. It would also seem to offer advantages for the local hub/centre to be located close to the schools.~~

~~12.20 There is no specific location for the new primary school indicated in the Local Plan. However the existing secondary school is located immediately north of the proposed Garden Neighbourhood and there is some logic that would support locating the primary school close to the secondary school where opportunities for shared facilities and ease for parents at pick up and drop off can be realised, and the extent of motor vehicle journeys within the Neighbourhood minimised.~~

~~12.21 Locating the primary school to the north of the development would enable the school grounds along with the existing woodland to the west and the secondary school to the north to form a good amount of green buffer between the existing and new settlement, while also offering opportunities for pedestrian and cycle routes. The proximity of the school grounds to the woodland area also gives the opportunity for outdoor school classes during spring and summer periods. The location of the primary school in this area would mean it is within easy walking distance from the existing and the new communities respecting the needs of both sides~~

12.22 Community consultation undertaken as part of the Neighbourhood Plan process revealed that indoor sports provision was the key priority for a facility thought currently to be lacking in the town and therefore the development of the Garden Neighbourhood should consider opportunities to provide such facilities where they can easily serve the new and existing communities. (See also **Policy SAX5**).

**SAXGN3: Community facilities**

The creation of the new Garden Neighbourhood will be supported by the provision of the following key pieces of community infrastructure:

**Primary school and associated early years setting:** consideration to be given to it being located to the north of the site, within the Neighbourhood Plan area to allow for physical and social connectivity with the existing community and secondary school and affording opportunities to enhance the proposed northern landscape buffer (see **Policy SAXGN2 ii)** above). Both facilities to be accessible by high quality walking and cycling facilities.

**Second Early Years Setting (of approximately 0.1 hectares):** To be suitably located to ensure good coverage of childcare across the Garden Neighbourhood and to ensure that both early years settings can be sustainable in the long term; and to be accessible by high quality walking and cycling facilities.

**Local centre/community hub:** to be located where it can best meet the needs of residents of the neighbourhood and the communities beyond, preferably in close proximity to the Primary School with easy access from all parts of the new neighbourhood, including the employment area. This would also allow for existing and proposed green links to come through the local centre creating a well-connected walking network.

**Proposed housing areas:** should create a well-connected neighbourhood where all housing types and tenures are equally distributed and are well located in relation to the green spaces, green links in order to maximise accessibility and to provide natural surveillance, as well as the location of the primary school and the local centre.

Proposals for additional **indoor sports provision** within the Garden Neighbourhood will be strongly encouraged. This could be co-located with the school(s) or the Local Centre/Community Hub and should be easily accessible from the town. **(See also Policy SAX5)**

Note: this policy only applies to the parts of the South Saxmundham Garden Neighbourhood that fall within the Saxmundham Neighbourhood Plan area.

Extract from Chapter 13

## 13. Opportunity Zones:

Saxmundham town centre

13.1 Saxmundham town centre is the historic heart of the town. It includes the High Street, Market Place and parts of North and South Entrances, together with Station Approach, Street Farm Road and Fromus Square plus Church Street which now gives access to two supermarkets. This is the centre of the town's economic and business activity, where a good variety of facilities are found.

13.2 The town centre is not unlike most market towns in Suffolk in that it has a range of issues and challenges to face in terms of reinforcing the retail role of the town centre in a changing retail environment, maintaining a good quality and safe environment for people to shop in and visit but at the same time catering for the demands of those visitors and local residents and businesses in relation to issues of parking, HGVs, traffic congestion, pollution and pedestrian safety.

13.3 Saxmundham however, does have some specific town centre issues of its own, which have been identified by the community through responses to consultation on the Neighbourhood Plan as it develops, and also reinforced as challenges by the technical work undertaken by AECOM.

13.4 The key physical and environmental issues for the town centre have been identified as:

- Traffic congestion in the High Street
- Narrow carriageways making an unsafe pedestrian and cycle environment.
- Lack of pedestrian crossings in the High Street.
- Unauthorised on-street parking.
- Lack of coherent signage.
- Lack of connection between High Street and surrounding open spaces.
- Station Approach feels disconnected from the town centre.
- Poor visibility at key junctions.
- Narrow pavements along the High Street hinder pedestrian flow.
- Narrow, uneven and inadequate pavements affect mobility, particularly for those with mobility difficulties.
- Limited street furniture and green elements along the High Street.

13.5 The Town Council engaged consultants AECOM in early 2021, to produce a concept Master Plan for the [High Street \(See Appendix XXX\)](#) area and present some potential options and opportunities for addressing these issues that the Town Council could then take forward.

13.6 The following set of primary objectives have been developed to guide the future of the town centre and the identified Opportunity Zones.

**Objective STC1: To create an attractive and welcoming town centre with space to gather and socialise, with a pedestrian friendly environment stretching from the Station to Fromus Square and along the length of the High Street.**



**Objective STC2: To reduce the non-essential use of the High Street by motor vehicles and to prioritise pedestrian movement and safety in the centre, whilst improving and encouraging parking provision in accessible locations within walking distance of the town centre.**

**Objective STC3: To protect and enhance the historic core of the town as defined by the Conservation Area.**

13.7 Due to the interdependency of various areas of the town centre, and the wide scope of potential actors involved in potential development proposals, it is important that proposals in this area are co-ordinated. The Neighbourhood Plan identifies the town centre as an 'Opportunity Zone' and proposals within the zone should contribute to the overarching town centre strategy as set out in **Policy SAXTC1** below and should be delivered having regard to ~~this Master Planning framework.~~ the Concept Masterplan for the High Street.

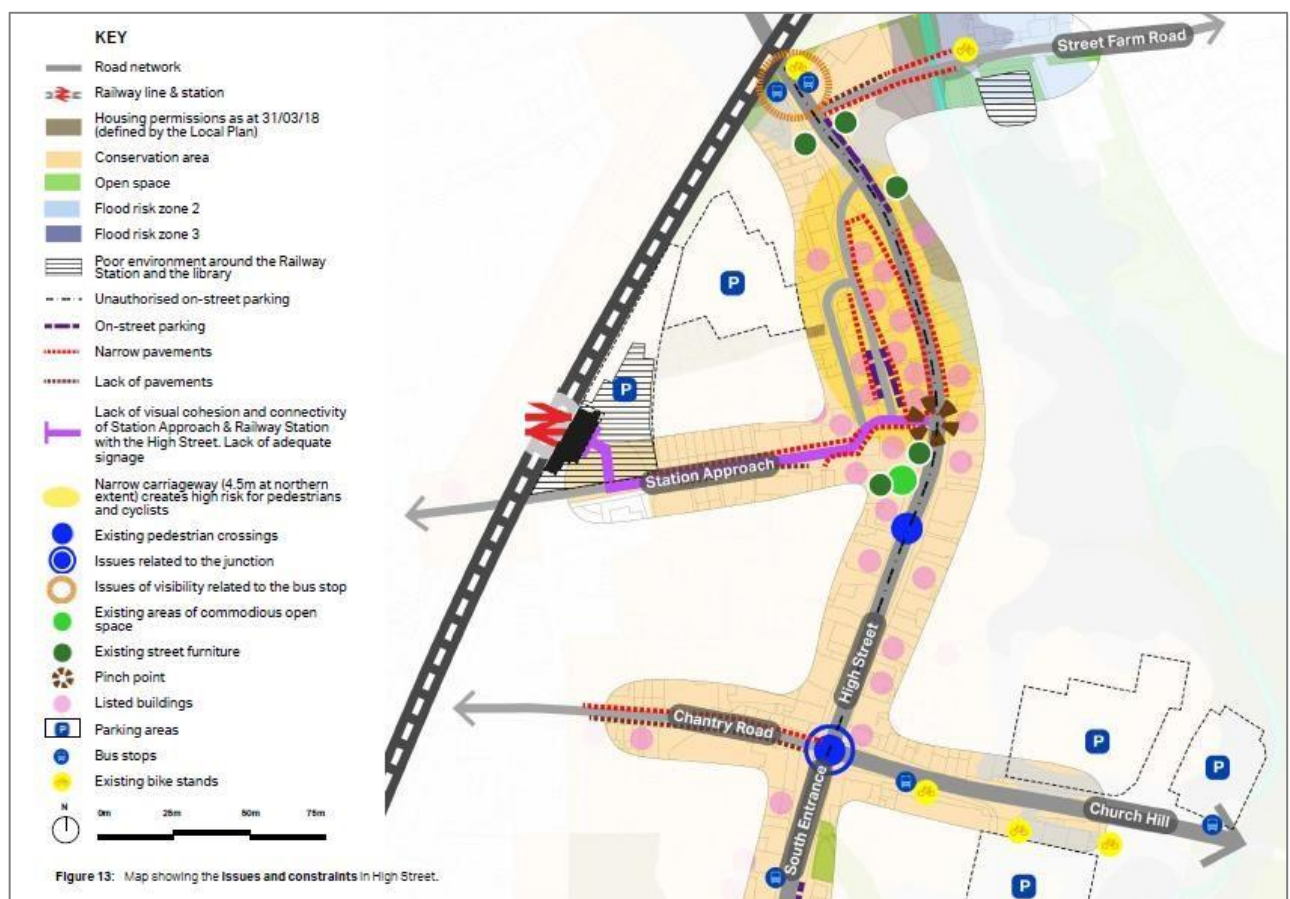


Figure ~~XX28~~: Issues and constraints around the High Street, Saxmundham (source: Concept masterplan for the High Street ~~and Garden Neighbourhood~~, AECOM).

**SAXTC1: Town centre overarching strategy**

Proposals will be supported that contribute to achieving a vibrant and bustling town centre comprising a healthy mix of retail, service sector, business, entertainment, cultural and residential uses.

Proposals should have regard to the advice contained within the Concept Masterplan for the High Street as set out in Appendix XXX.

Development proposals in and around the High Street will be supported where (if otherwise appropriate) they contribute to the following aims, as appropriate:

- a. Reinforce the area's distinctiveness and attractive character as a location where pedestrian activity is prioritised and users have a high sense of safety and belonging.
- b. Ensure the impact of vehicular traffic is relatively low and frontage servicing is minimised.
- c. Support good connectivity between the different areas of the town centre by creating a pedestrian friendly environment.
- d. Enhance the focal point around the Market Hall and The Bell Hotel as a desirable meeting place.
- e. Enhance of the appearance of the frontage of the Market Hall as an important landmark building, which contributes to the character of the town centre.

Development proposals that improve accessibility and safety for pedestrians, cyclists and other town centre users will be supported that:

- f. Provide for parking within easy walking distance from the town centre to encourage walking.
- g. Improve provision for cyclists both in terms of access and for cycle parking.
- h. Enhance the visual appearance of the High Street through the use of an increased number of 'Street trees.'

Proposals will not be supported where they would be detrimental to these aims.

See also **Policy SAX11: Historic Town Centre and Conservation Area.**