



**Saxmundham Town Council:
Response to First Draft Local Plan of Suffolk Coastal District Council**

(agreed by Saxmundham Town Council at its meeting on 10th September 2018)

Summary of Conclusions and recommendations

- Saxmundham Town Council considers that the town is well located to be a thriving retail, employment and service centre, for which it has strong locational advantages
- We support further growth of the town, which will benefit its residents and businesses, and provide services for neighbouring areas
- We consider however that the scale of growth proposed in the draft Plan for Saxmundham is excessive and not justified; it would involve the town growing by at least 50% in population over the next decade, and by around 60% from 2011.
- Moreover, we consider that for one small town to be required to take more than 20% of the total new homes for the whole Suffolk Coastal District is itself disproportionate and will have a negative impact on the overall character and environment of the town. And when combined with the potential development of Sizewell C and the impact that could have on local infrastructure, transport and demand for services, the proposed development presents a very real risk that existing services would be overwhelmed and unable to cope.
- We consider that the current proposals for a South Saxmundham Garden Neighbourhood are ill-conceived and excessive. 800 homes in this area may be excellent for landowners and developers, but is not shown to be in the interests of the town, for reasons set out above. While treating the whole area as a single entity, the draft Plan fails to provide any serious or guaranteed means of linking the two sides of the railway into a coherent and integrated development, which is the very essence of master planning.
- Just as significantly, the draft Plan appears to be based on apparent mistakes of fact as to land availability for development elsewhere, i.e. the larger site 435 to the east off Church Hill. This has been justified in two different ways – (a) that the land is not available for development in the lifespan of the Plan, which we understand is not correct; (b) that the land is less suitable on planning grounds than the south Saxmundham sites

- Despite requests, we have not been informed of any planning assessments that give rise to the conclusion that the Church Hill site(s) would be less suitable than the south Saxmundham sites. We believe that there needs to be clear evidence based on proper assessment before a rational conclusion can be reached on respective suitability.
- Moreover, we believe that there is or may be a strong case for a split development, with part taking place on the less environmentally sensitive area to the south which is west of the railway, i.e. close to the Free School area, and part on the land to the east off Church Hill. This would prevent the worst urban coalescence, enable the current Layers site to be preserved, and keep important ecological and other advantages.
- We do not consider that the present Garden Neighbourhood (GN) proposals in the draft Plan reflect the Garden City principles in a satisfactory way, and this adds to our non-acceptance of the GN based on other grounds. We are also extremely concerned at the apparent coalescence with Benhall, and on material variances in different versions of the GN site plans.
- We propose that the new housing requirement for Saxmundham for the next Plan period should be in the region of 400 to 600, which could be (we believe) accommodated in principle, and subject to detailed analysis of planning suitability, on the two sites (south/west of rail; east/Church Hill), to also include primary school and employment land.
- We believe the first focus must be on providing affordable homes for local people, including for younger people. This requires different sizes and tenures to meet the needs of different types of household. Since we have a significant population of older residents, housing needs also to reflect their needs.
- Housing also needs essential related infrastructure for - in particular – drainage, waste water, sewage and other utilities. We consider that specialist surveys are required before reaching firm final proposals.
- We support the overall strategy for Saxmundham in the draft Plan, save as set out here in relation to the proposed South Saxmundham Garden Neighbourhood.

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1. Our broad aims for Saxmundham

Saxmundham Town Council has recognized and welcomed that our town will continue to grow and provide an attractive and lively place for local people. Saxmundham has a fine town centre with two major supermarkets and a strong historic heritage and protected as a conservation area. It has good transport links and is a “gateway” for access to the Suffolk Heritage Coast and local countryside. Local people need local housing that is affordable and well-designed. Accordingly, we have not opposed growth, which – if well planned - can help to protect and bring life to our somewhat fragile town centre. In the Town Council’s response to the October 2017 Issues and Options consultation paper, we stated:

“Saxmundham welcomes a future in which the town grows in size and location in a way which is consistent with, and which respects, its character, heritage and landscape, and which brings potential economic and social benefits to the town. Looking ahead, the precise boundaries of the town (parish) may mean that future development and planning for the area need to be seen and discussed in conjunction with neighbouring parishes

Any significant growth must equally be based on the provision, from the outset, of good physical and social infrastructure. We have had too much growth in recent years that has not reflected this principle which must be fundamental to the town’s development. Moreover, Saxmundham’s public and community services, reflecting the town’s function as a local centre, serve the population of surrounding villages and areas, and the impact on our town’s infrastructure (once more, social as well as physical) needs to be taken more fully into account, e.g. doctor’s surgery and health services.”

The key issues for a Local Plan are of course by no means limited simply to the size of population and numbers of houses, central as those issues are. Our response last year also highlighted other vital issues and concerns:

“Saxmundham Town Council considers that in looking at future development of our town, we should not focus only on housing. Issues of employment opportunities, social inclusion, good quality recreation and “party time” facilities are also of great significance. Yet our town centre, and to some extent our social fabric, are showing signs of stress...

We are aware that the nature of smaller town High Streets is changing rapidly, and that we need to be alert to new possibilities that bring benefits. We see an increased role for the town centre as a centre for enjoyment (including restaurants etc.) and cultural-cum-recreational activity, especially for families. We would at this stage not argue for any loosening of the planning framework that would tend to diminish street-front commercial uses, i.e. towards more conversions of shop fronts to residential (as against upper floors etc.)”.

2. The Scale of development proposed for Saxmundham

However, the specific proposals in the new draft Plan would have a fundamental impact on our town and its residents. The District Council has chosen, for reasons explained, to consult precisely over the summer holiday period, but the Neighbourhood Plan Steering Group had in any event consulted locally over three possible “scales” of future development, with imagined consequences of each, using public meetings, social media and publicity in the East Anglian Daily Times.

We have noted the District Council’s assessment of the need for future housing development to meet the needs of our growing population. In brief, for the 20 year period 2016 – 2036, there is an estimated need for 10,900 additional dwellings, for which 8,623 planning permissions already exist, leaving a residual need for a further 2,277, plus a 10% contingency margin (1,090) bringing the total SCDC need to plan for of 3,370.

Of these, 800 are proposed for Saxmundham in a proposed new, ‘master-planned’ Garden Neighbourhood, to add to the approximately 200 further dwellings to be built, using existing permissions, and providing the balance of provision for the previous plan period. Thus, Saxmundham would be due to provide 1,000 further dwellings. Assuming 2.2 persons per dwelling, the 800 new Garden Neighbourhood homes would add 1,760 to the population, and 1,000 in total would add some 2,200 to the population.

To give an idea of scale, the population of the parish of Saxmundham, according to census figures, was 2,409 in 1991, 2,712 in 2001, and 3,644 in 2011. By 2018, we can reasonably estimate that around 400 further homes have been built (260 from 2014 to 2017), meaning that the population today is in the region of 4,500.

This means that the 800 new homes in the South Saxmundham Garden Neighbourhood would increase the town’s population by 40% from today, and by almost 50% from 2011.

The increase overall (for 1,000 new dwellings in total) would increase population by almost 50% from today, and by 60% since 2011.

Looked at as a proportion of the total new homes to be planned for, the 800 in Saxmundham represent 22% (more than one in five) of the 3,562 for the whole Suffolk Coastal area. (And if we take the number without the 10% contingency, Saxmundham’s proposed ‘share’ rises to 32% of the total.¹

We consider that the proposals in the draft Local Plan for future development in Saxmundham constitute excessive development for a small town with a strong local character. Last year, the Town Council indicated support (in its response to the Issues and Options paper) for “an increase in housing, over the period to 2036, of between 300 to 600 new dwellings based on the medium growth scenario.”

The responses to the Neighbourhood Plan team’s consultation to date has suggested that there is fairly broad support in the town for growth over the next Plan period of this sort of order of magnitude, provided that other issues (infrastructure etc.) are resolved and guaranteed.

Finally, we have not seen any evidence of support or justification, in the Analysis of Response to the Issues and Options Paper, to a development of this scale in south Saxmundham.

¹ Taking 720 for Saxmundham (800 less 10% contingency or 80 =720) out of Suffolk Coastal total figure of 2,277

3. Location, location...

There are in reality only 2 practicable remaining locations for any significant scale development within the parish boundaries of Saxmundham – to the south, where the Garden Neighbourhood is now proposed, or to the east, continuing up Church Hill beyond the existing Hopkins Homes developments. Though the south site could potentially be seen as two separate locations, since it is divided by the railway line, and unless a road bridge is built, the two sides of the track are in essence two separate locations. (To go further west, one must cross the A12, and that is agreed to be wholly unacceptable in terms of sustainable development. To the north, the town abuts Kelsale, with no room for any significant development. And if you go very much further east, the new housing would in effect be too distant from the town.)

The draft Plan proposes only the southern site(s), and rejects all but a modest development to the east. The reasons for this are not convincing, and we do not accept them.

One problem is that issues of availability and suitability have been confused and it appears that errors have been made. In the Issues and Options paper, there was a section setting out sites offered by landowners for development, and this included large sites in south Saxmundham (and into Benhall) and east Saxmundham. Of course, this did not involve SCDC then expressing any view on their suitability.

The reasons given in the new draft Plan for not considering the larger part of the Church Hill option, are set out in Appendix I, which looks at Alternative Sites, and reports reasons for them not being ‘preferred’. For the larger Church Hill site, we see (p.108):

“Site identified as potentially suitable in Draft SHELAA – However, sites 714, 717, 1012 (site allocation SCLP12.26) to the South of Saxmundham and existing site allocation SCLP12.27 were considered more suitable.

The Council supports the Neighbourhood Plan as the mechanism for delivering further residential development. The Local Plan has detailed the Neighbourhood Plan should deliver small scale additional development and windfall.”

Apart from the point that this reduces the Neighbourhood Plan to a wholly marginal role in relation to housing in Saxmundham, this reasoning appears to indicate that a comparative site appraisal has been carried out, because no conclusion on the other site being “more suitable” could properly have been reached without this. We have asked for access to the comparative studies, but no answer on the point has been received. We are therefore not yet convinced that there has in fact been any proper study of the respective merits of both sites, on an equal and correct basis. If we are wrong, we would again ask for access to the respective studies.

Then at pages 110-111, in a section on ‘Development on the Southern half of 435, 559 and northern half of 714’, we read that

“As the northern part of site 435 originally submitted is not available during the lifetime of this Local Plan there is not scope to consider a comprehensive development elsewhere in the town. Development across different locations would not provide the opportunity for a master planned approach to delivery of infrastructure.”

“The northern part of site 435” is, as we understand, the larger part of the site in question up Church Hill. This appears to give a different reason for the non-acceptance of the northern part of 435, i.e. its non-availability during the whole period of this Local Plan. As we understand it, this is based on

incorrect information, since we understand that the landowner is still willing to offer the whole site for development. The main draft Plan does not even refer to the larger site, and this appears to us (if we are correct in our understanding of the availability issue) to constitute a major flaw in the whole reasoning of the Plan as it applies to Saxmundham.

Accordingly, before looking at how important a masterplan approach may be, the issue of site availability and planning suitability of each relevant site needs to be addressed head-on and fairly, without preconceptions. This, it would appear, has not yet been done.

In the draft Plan, at 12.210 to 213, a smaller site up Church Hill is referred to which is said to raise “concerns regarding the capacity of the highway network in this part of the town and its ability to accommodate additional provision over that already permitted” so that “a transport assessment will be required.” Moreover, “Anglian Water have confirmed there will be a need for improvements to the foul sewerage network to enable the development of this site.”

What concerns us is that similar issues are very likely to apply to the south Saxmundham site(s), but no such qualifications have been expressed.

Thus, we believe it is essential to consider other options, and not simply defend an a priori decision. We consider that – for example – it would be possible, and may be the better planning solution, for part of the development to take place in the south, to the west of the railway across to the A12 (e.g. 250-300 dwellings) and part on site 435, up Church Hill (e.g. 150 – 200 dwellings). Given that the railway divides the southern sites so completely, the weight given in the draft Plan to the benefits of a masterplan approach is misplaced, if there are (as we believe may be so) better overall planning solutions involving two different sites. The sharing of land values to include the school etc., and choice of location, appears no harder in principle than on either side of the railway divide.

4. The issues around the south Saxmundham development proposal

The land to the south of Saxmundham, and to the west of the B1121, is a much valued local facility, providing a green and pleasant space with public footpaths much used by residents for recreational and health-related walking, including many dog-walkers. It has a significant local ecology (including bats, skylarks etc.) From the public footpaths to the east of the railway, there are excellent and historic views across the Layers to Saxmundham Church as well as Hurts Hall, and also a pleasant landscape. On the east side of the B1121, there are by contrast no local footpaths, so if large-scale development takes place on The Layers, the residents of much of Saxmundham will have no local walks into countryside close at hand, unless they are willing to risk crossing the A12 on foot.

Just as importantly, the area known as The Layers has also represented the “space between” the settlements of Saxmundham and Benhall, over the centuries. It protects the historic entrance to Saxmundham from ribbon development or urban sprawl, and – coming from the south - conserves the sense of arriving in an attractive historic town.

The proposals for a South Saxmundham Garden Neighbourhood will, even if the development was successful in its own terms, destroy or damage all of these advantages. The local ecology will be affected; the landscapes and historic views will be lost, the footpaths may be retained but will effectively be ‘urbanised’. There will in effect be an almost complete coalescence between Saxmundham and Benhall, as is shown on map/illustration on page 239 of the draft Plan, where the area marked in blue virtually reaches Benhall. While welcoming the Plan’s non-acceptance of development on the east side of the B1121, described as being “a more sensitive landscape area”,

we underline that as it has no public footpaths, there is no public access to it, so it does not offer any 'recreational opportunities' nor contribute to public health goals for exercise.

In Policy SCLP12.26: South Saxmundham Garden Neighbourhood, p.242, it is claimed amongst other matters that the following will occur:

- b) Appropriate green infrastructure provision to provide accessible natural green space and retention and enhancement of the natural features on the site such as trees, woodland and hedgerows to be incorporated into the layout of the development;
- c) Appropriate open space provision for both informal and formal recreational opportunities;
- d) Public rights of way on the site should be preserved and enhanced;
- e) Biodiversity networks and habitats to be preserved and enhanced;

In brief, we believe that these alleged advantages in reality are unlikely to accrue, given the need to fit in on the site 800 dwellings, school premises and employment land, on 44 hectares. Adding to concerns, the illustrative masterplan approach, set out at page 243, shows mixed use development covering large areas of existing public footpaths, hedgerows etc. The draft Plan, that is, already undermines its own planning principles.

5. Coalescence with Benhall?

We have mentioned this concern already. However, since drafting other parts of this response, we have seen a different plan which your officers produced, we understand, to Benhall Parish councillors at a meeting after the draft Local Plan was published. The plan is indeed dated 1st August 2018. This shows a "hard" southern boundary to the Garden Neighbourhood zone, further south by about 100 metres than shown in the consultation document, and touching on Kiln Lane. This is extremely concerning, in substance and in process. It even raises issues of credibility and transparency, since the later map has not been provided to us or to Saxmundham residents.

In the draft Local Plan, paragraph 12.209 is quite explicit:

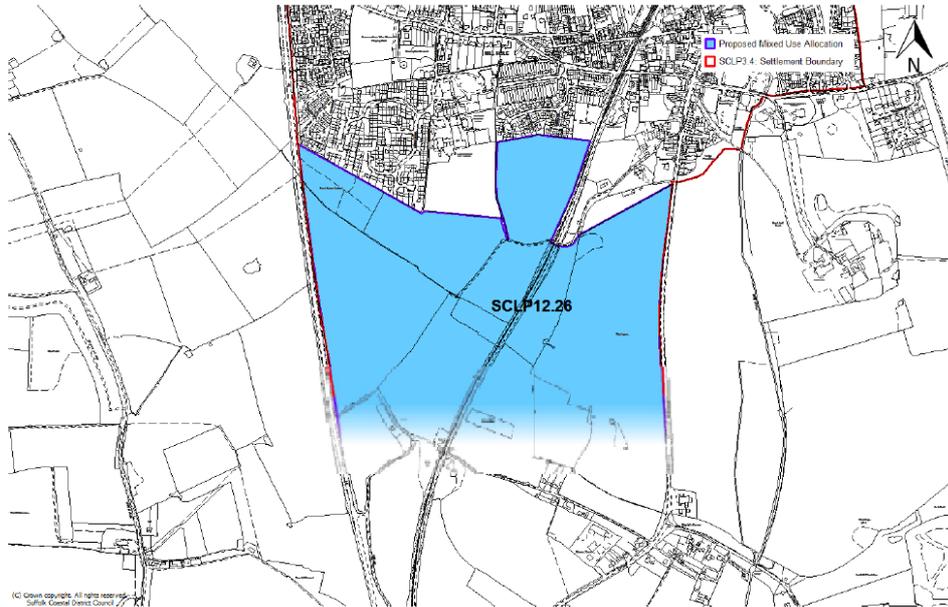
"The southern boundary of the site is to be defined, and will be informed through responses to consultation but **is intended to avoid coalescence between Saxmundham and Benhall.**"
[Our emphasis]

Paragraph 12.200 of the draft Plan, however, refers to reducing "the perception of coalescence":

"To reduce the impact of the development, significant green infrastructure provision and areas of natural green space for recreation are required. These areas will provide amenity value for the future community, a variety of habitat for wildlife **and also reduce the perception of settlement coalescence between the built up areas of Benhall and Saxmundham. Through the master plan approach the southern boundary of the garden neighbourhood will be defined through appropriate green infrastructure.** Ensuring the provision of appropriate green infrastructure is a fundamental part of the creation of a new community in this part of the District and will complement the existing areas of woodland, the public rights of way and the adjacent countryside." [Our emphasis]

All this is confusing and possibly disingenuous. The shaded area on the southern edge of SCLP 12.26 is there because, allegedly, the southern boundary is yet to be determined, and it shows some (though quite inadequate) zone between the settlements. Taking into account 12.209, we had understood the

South of Saxmundham Garden Neighbourhood



Suffolk Coastal District Council

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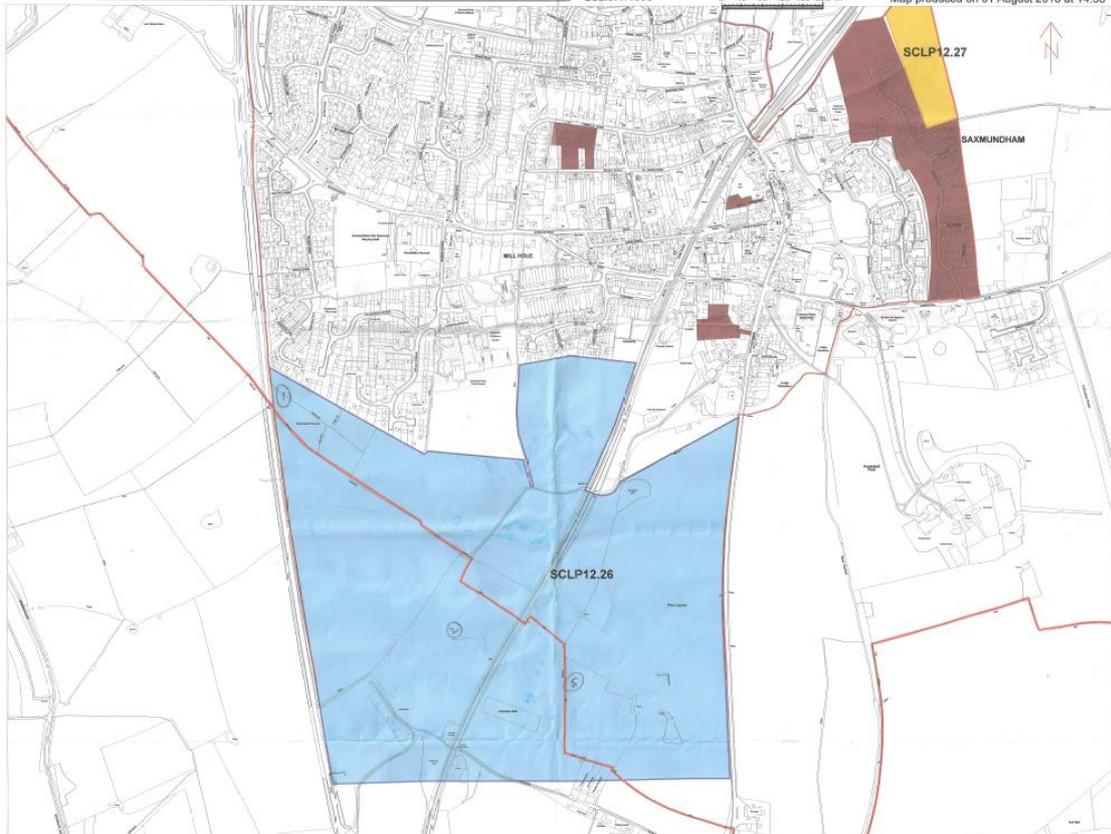
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Benhall & Saxmundham

Scale: 1:4000

Scale
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Map produced on 01 August 2018 at 14:53



drafting in this sense – that there would be an area (even if relatively short) between the settlements, to be defined, with “green infrastructure” at the southern end of the development.

But having seen the later plan, also clearly marked SCLP 12.26, the term “reduce the perception of settlement coalescence” may also imply however that there will be full coalescence but the “perception” needs to be reduced. For the plan as shown to Benhall is for full coalescence, as it abuts long-standing housing on Kiln Lane.

We would also draw attention to the “indicative draft masterplan” on p.243 which – despite being quite inadequate in its own right – does appear to show that the southern end of the development ends well short of the Kiln Lane Benhall settlement.

6. South Saxmundham Garden Neighbourhood: master-planning & the transport link issue

As we have noted, the draft Plan argues (incorrectly, in our view) that virtually all of the development should be sited to the south of Saxmundham, rather than potentially split between part of the south and the larger site to the east, on the grounds that this enables a masterplanned approach.

Were the finalised Plan to maintain the totality of the current proposal, despite its flaws, we would in principle agree that it is better to have a masterplan approach than not. But this raises another key issue – is the proposal for the South Saxmundham Garden Neighbourhood in reality a single location and development that can be masterplanned as such? Or is it in reality two separate sites, split almost completely by the railway?

In Policy SCLP12.26 (p.242) we read that the development will require

- g) Provision of new vehicular access points off the A12 and the B1121 supported by further access for pedestrian and cycle traffic in other locations.

This does *not* include a vehicular crossing (bridge or otherwise) to join the two sides of the railway. There is a small existing bridge which could be used by cycles as well as pedestrians, but is not able to take cars etc. Vehicular traffic to the west of the railway would thus only be linked to the A12, and to the east only to the B1121.

In the body of the text, however, we read:

12.203 Vehicular access is expected to be from the A12 and also the B1121. The creation of new access points onto the existing road network will ensure that the new community is served by appropriate vehicular access. **The railway line splits the area to be master planned and it is essential that appropriate vehicular crossings are introduced to enable the free circulation of vehicular movements on this site. An existing crossing is already in place and the Council will work in partnership with the landowners and Network Rail to ensure appropriate crossings are realised over the plan period.** It is likely that the development will result in localised impacts on the transport network, and any necessary mitigation measures will need to be provided, as informed by transport assessments.

[Our emphasis]

This is a matter of great concern, should the overall plan for development be maintained. There is absolutely no assurance nor guarantee that appropriate vehicular crossings will actually be constructed, even though considered essential to the master planning approach. On the contrary,

this wording could mean that, despite best SCDC endeavours, no crossing is built, or that one is ultimately built, but not till 2036, i.e. over a decade after the development.

It is therefore frankly nonsensical to talk about a single coherent masterplanned approach if the two sites are in practice physically separated with no vehicular crossing being required nor guaranteed.

7. An education led development?

Policy SCLP12.26 on page 242 refers to “an education led development” which should include “Provision of a primary school with early years provision”. It is the case that, at some point in the next Plan period, if the town grows significantly, a new primary school will be needed. The County Council has indicated the following position:

	Total Capacity	95% Capacity	2018	2019	2020	2021	2022	Available Places in 2022
Saxmundham Primary School	315	299	280	289	288	281	274	25

This includes estimates of new demand from dwellings in the pipeline. The SCC officer adds:

“If significant growth for Saxmundham beyond 100 houses were proposed (such as in the preferred options draft of the local plan) then there would need to be an expansion of education capacity.”

The position for early years is more immediately problematic:

“Early Years – There is currently a deficit of early years places in the Saxmundham Ward. As of 26/06/2018 the deficit stood at -38 places.”

(For secondary education, there remains significant local capacity at the Free School, likely to be adequate for the Plan period).

Therefore, we accept that if there is to be development of several hundred new homes in and around Saxmundham, there will be a need for a new primary school; and we already need early years provision.

At 12.207, the draft Plan recognizes however that the need for a new primary school results from the new development itself, not from a current shortfall of provision:

“To support the delivery of these requirements, residential development of approximately 800 dwellings will be required in this location. **The dwellings will generate the need for primary school and early years provision** but can also help facilitate additional provision of infrastructure required.” [Our emphasis]

This is confirmed by Suffolk County Council’s ‘Education and Learning Infrastructure Plan’ (<https://www.suffolk.gov.uk/children-families-and-learning/schools/education-and-learning-infrastructure-plan/>) which does not locate any shortfall in the Saxmundham area, and indeed its “primary school hotspot” map of Suffolk shows Saxmundham as in an area of no capacity issues.

What we disagree with in the draft Plan in particular is that “800 dwellings will be required in this location”. This is not a logical step. Primary school provision should of course be located if possible in or close to a residential zone, but it serves a wider area. The new housing development might be in one or two sites in the town – that does not affect the education planning issue. Moreover, the County Council no longer itself provides schools, but (also from the Education and Learning Infrastructure Plan):

“Any new school that opens in the county would be a free school or voluntary aided school. If this is a school that the Local Authority is opening, a free school presumption process would be run (formerly an academy competition) to identify and recommend a sponsor to the Secretary of State.”

This makes it all the more important to understand who the potential provider might be, and what their proposals might be.

It cannot be a rational policy that – as a result of primary school estimates - either there must be almost no further residential development, or it must be as large as 800 dwellings, with nothing in between. If other planning reasons indicate that appropriate local development for the next period would produce say 500 units, then this should not be overridden solely on educational planning assumption grounds.

8. Exploring the wider arguments for a South Saxmundham Garden Neighbourhood (GN)

In an early section of the draft Plan, on Spatial Strategy and Distribution, we read:

3.16 A large proportion of development is focused on the Saxmundham Garden Neighbourhood to enable the delivery of required education infrastructure, utilise the connections provided by the railway station and support the improvements to the A12 proposed as part of the Suffolk Energy Gateway Four Villages bypass. Saxmundham is geographically well placed in the District to provide employment opportunities for the communities in the north of the District and improve the connections between Ipswich and Lowestoft. The emergence of Sizewell C Nuclear Power Station will also further support the strategic growth of Saxmundham as a Market Town with a variety of services and facilities.

Comments: The evidence shows that the GN does not “enable the delivery of required education infrastructure” so much as give rise to the need for such infrastructure. The exception is early years provision, where there is a shortfall but not requiring of itself such a scale of development. We welcome growth of our town, but the scale proposed is excessive.

The railway station does have reasonable connections, but at times the rail provision is already close to capacity. The station needs upgrading, notably after the fire early this year. The rail and road connections provide a good reason for reasonably further development, but do not of themselves justify the scale proposed.

The road improvements and bypass are not, we understand, currently approved for financing nor in any way guaranteed for the future, so do not as yet add to or support the justification.

Similarly, we agree that the rail link to Saxmundham is an important positive factor, but also note para. 1.27 (p.6) where the likely limitations are also referred to:

Rail capacity is limited and the conflict between demand for passenger services and freight services is expected to intensify over the plan period. Strategic improvements to the rail lines have taken place in recent years and others are anticipated to come forward in the future.

We agree that Saxmundham may be well placed for some employment growth over the coming period, though the precise forms are not as yet clear. But the town needs to be ready to welcome good new employment opportunities, including ones arising from our location. We do not however support low-density or minimal employment developments such as warehousing, which would not support Garden City principles.

We await to see whether Sizewell C will in the event proceed. If it does, it should enhance the strategic position and advantages of the town notably in terms of services and employment.

3.17 Consultation responses have highlighted the need for further education provision, improvements to the capacity of the medical practice and congestion issues in relation to the B1119 and B1121 crossroads and access to the supermarkets on Church Street. This Local Plan seeks to address these issues through a comprehensive garden neighbourhood master plan for Saxmundham which will provide employment opportunities, primary school, residential units and other supporting infrastructure.

Comments: We have dealt above with education provision issues. The issues around the medical practice and crossroads congestion are important ones also raised in consultation around Neighbourhood Plan etc. We agree that a reasonable scale of development and growth may help in adding to the capacity of the medical practice, but the new development will itself generate additional demand. We do not however see how the SGN would of itself help address congestion issues in relation to the crossroads and access to supermarkets, since it would be a vehicle-generator in its own right. Once again, the issue for us is not growth but the over-large development on a single site.

On the wider issue of Sizewell C we agree that this would have a significant impact on Saxmundham as well of the surrounding communities should construction go ahead, it is therefore surprising that so little consideration is given to issues concerning Sizewell in the Draft Local Plan. We would draw attention to the issues we raised in Sizewell Stage 2 Consultation:

<http://www.saxmundham.org/documents/STCresponsetoSizewellCStage2Consultation.pdf>

Amongst these are the challenges that the Sizewell C project will present to local infrastructure, and to local amenities and services. So for example issues we raise in this Draft Plan response such as the problem of congestion issues at B1119 and B1121 would be that much worse with the combined impact of traffic generated by the GN (both at construction and later stages) and additional traffic generated as a result of Sizewell, including using Saxmundham as a 'bypass' to avoid congestion points on the A12 and B1122.

9. The Garden City principles

At para.3.12 (p.29), the draft Plan gives support to the following of Garden City principles in relation to the proposed Garden Neighbourhoods:²

Opportunity exists through land allocations to follow the principles of Garden Cities as Garden Neighbourhoods for Suffolk Coastal which provide generous provision of green spaces, range of local facilities including schools, shops, meeting places and other community spaces alongside opportunities for recreation, walking and cycling. The variety of green spaces and community facilities are to be supported by employment opportunities and a wide choice of new housing to meet a range of needs, supported by the most up to date digital infrastructure.

We do not consider that the proposals in the draft Plan reflect the TCPA principles in a satisfactory way, and this also underpins our rejection – on other grounds too - of the Saxmundham Garden Neighbourhood proposals as they stand. Amongst other factors, we do not feel that to date, there has been shown to be a “strategic approach”, nor as yet any effort to gain buy-in to build a sense of “strong vision, political support and commitment” from our community. This requires far better and fuller partnership with the Town Council and Saxmundham community, not the top-down approach demonstrated here.

We have looked, by way of comparison, at the 2017 draft Local Plan for Waveney District Council (with which Suffolk Coastal is soon to be merged to form East Suffolk DC). The Garden Neighbourhood proposal for Beccles and Worlingham (WLP3.1, page 90 in [1st draft Plan](#)) is more detailed and specific, includes more community facilities, and appears to rather more faithfully reflect the Garden City principles. For example, it cites the desired density (30 dwellings per hectare), which implies that a greater proportion of the site would be given over to “green” and other development uses. The site is twice the size of what is proposed for south Saxmundham, but the number of dwellings is only 50% more than in Saxmundham. As to community facilities, it includes “Retirement community comprising a care home / nursing home and extra care and/or sheltered dwellings; 2 form entry primary school including a pre-school setting (2 hectares); Country park, indoor/outdoor sports facilities, allotments, play areas and public open space (at least 25 hectares); Community Hub comprising a convenience store, local shops, community centre and pre-school setting.”

Comparing the (1st) draft indicative masterplans for Saxmundham and Beccles, one can see how under-prepared and inadequate the Saxmundham GN proposal is at this point – see Annex. (We have compared with the 1st draft of the Waveney Plan, rather than the more recent [final draft](#), to ensure a like for like comparison.)

10. The (remaining) Strategy for Saxmundham

The short overall strategy for Saxmundham is set out at Policy SCLP12.25: Strategy for Saxmundham.

Leaving aside the final passage relating specifically to the Garden Neighbourhood, it provides:

² These principles are set out in Appendix F (Glossary), and reflect those of the Town and Country Planning Association

“Saxmundham will continue to be a thriving retail, employment and service centre... recognising the opportunities related to the connections offered by the rail and A12 transport corridors. The strategy for Saxmundham is to:

- a) Enhance the vitality and vibrancy of the town centre, including through protecting and enhancing the historic core of the town;
- b) Utilise opportunities related to the presence of the railway and the proximity to the A12;
- c) Diversify and expanding employment opportunities;
- d) Enhance pedestrian and cycle connectivity around and beyond the town, particularly to the town centre and the railway station;
- e) Promote quality of life through enhancements to networks of green infrastructure; and
- f) Increase the provision of housing and affordable housing, and providing greater choice in the mix of housing available.

We are broadly in agreement with this, but would wish also to conserve the town’s distinctive character as a market town, and prevent coalescence or near-coalescence of settlements.

We would be pleased to work with the District Council in implementing forward-looking town centre policies, drawing on guidance and ideas coming, for example, from the Local Government Association ([“Revitalising town centres: a handbook for council leadership”](#)).

11. The housing Saxmundham needs

To meet the goals set out in the Strategy for Saxmundham, we first wish to underline that – while Saxmundham can never provide all of the employment for local people in the immediate vicinity – we should work to ensure that future plan for our town do not actively promote it becoming little more than a “dormitory town”. That is why the issue of housing is in reality inter-twined with enhancing the vitality of the town centre.

We believe the first focus must be on providing affordable homes for local people, including for younger people. This requires different sizes and tenures to meet the needs of different types of household. Since we have a significant population of older residents, housing needs also to reflect their needs, including the likely need for housing with support and/or sheltered dwellings

We generally support the proposed requirement in “Policy SCLP5.10: Affordable Housing on Residential Developments” under which for larger (10 or more) residential developments should provide for “1 in 3 units to be affordable dwellings, and to be made available to meet an identified local need. Of these affordable dwellings, 50% should be for affordable rent / social rent, 25% should be for shared ownership and 25% should be for discounted home ownership.”

Under para.12.207, referring specifically to the Garden Neighbourhood proposal,

A range of dwelling types and tenures will be required in accordance with housing policies in this Local Plan. The opportunity exists however to meet the needs of local people and re-establish higher standards of building design which takes into account modern environmental and energy efficient standards to create a healthy community. Dwellings

targeted at younger people as well as those which meet the needs of the ageing population will be delivered alongside affordable housing and open market housing.

We support these aims, with special emphasis on meeting the needs of local people, but they should apply generally to new developments in the town, whether to the east or the south.

We see that the Waveney plan for Beccles Garden Neighbourhood (para. 3.13) specifies:

The development should utilise garden city principles. The development of the area should exhibit exceptional urban design. It should score particularly well against Building for Life criteria (see Policy WLP8.29). Developers are encouraged to seek Built for Life Quality Mark for housing development on the site.

This requirement for exceptional urban design is not reflected in the SCDC plan for Saxmundham, and should be if the proposals go forward.

We particularly underline the Garden City principle that “The majority of homes should be affordable” and if the Garden Neighbourhood proposal proceeds, this principle must be at its core.

We would also draw attention to [the common Tenancy Strategy](#) developed under the Localism Act by a partnership of nine local authorities in Essex and Suffolk (including Suffolk Coastal) and Registered Housing Providers (RPs) that work within the East Anglia area. This includes a definition of affordability (within 25% of an individual’s full time income) and some helpful guidelines around tenure mix and section 106 agreements.

Housing also needs essential related infrastructure for - in particular – drainage, waste water, sewage and other utilities. Residents have expressed serious concerns as to whether the south Saxmundham site does or can meet the necessary requirements in these regards. We consider that specialist surveys are required before reaching firm final proposals.

12. General planning policies

Subject to more detailed comments in this response, we broadly support the general policies set out in the draft Plan, e.g. on the economy, tourism, transport, natural environment etc

13. Saxmundham's Neighbourhood Plan

Suffolk Coastal District Council are well aware of the work that has already taken place with the support of Town Council to develop a Neighbourhood Plan for Saxmundham. This work has included a number of community consultation events including the scale and location of future housing, town centre issues etc. We understand that Neighbourhood Plans need to work within the framework of Local Plan policies, but the draft Plan as far as it concerns Saxmundham is so prescriptive that in effect it takes away almost all local choice and discretion, and imposes a top-down approach that we consider breaches the spirit of localism and local democracy. Those communities that had already completed their Plans are, by contrast, given far more scope for local choice and decision-making.

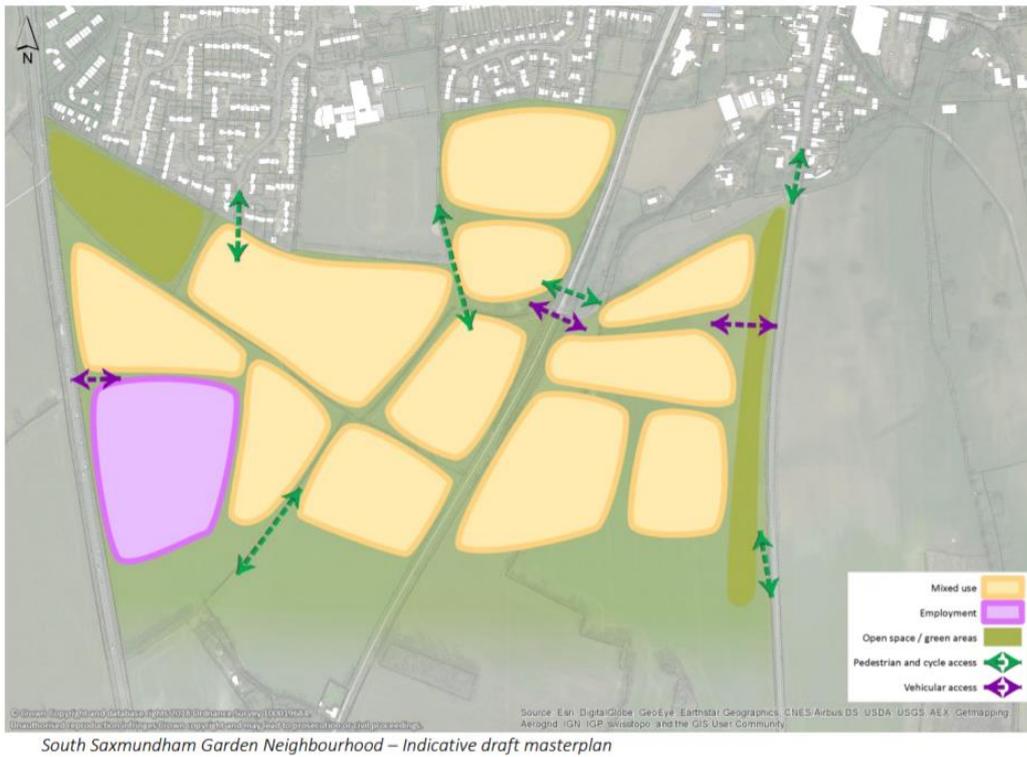
14. Conclusions and recommendations

- Saxmundham Town Council considers that the town is well located to be a thriving retail, employment and service centre, for which it has strong locational advantages
- We support further growth of the town, which will benefit its residents and businesses, and provide services for neighbouring areas
- We consider however that the scale of growth proposed in the draft Plan for Saxmundham is excessive and not justified; it would involve the town growing by at least 50% in population over the next decade, and by around 60% from 2011.
- Moreover, we consider that for one small town to be required to take more than 20% of the total new homes for the whole Suffolk Coastal District is itself disproportionate and will have a negative impact on the overall character and environment of the town. And when combined with the potential development of Sizewell C and the impact that could have on local infrastructure, transport and demand for services the proposed development presents a very real risk that existing services would be overwhelmed and unable to cope.
- We consider that the current proposals for a South Saxmundham Garden Neighbourhood are ill-conceived and excessive. 800 homes in this area may be excellent for landowners and developers, but is not shown to be in the interests of the town, for reasons set out above. While treating the whole area as a single entity, the draft Plan fails to provide any serious or guaranteed means of linking the two sides of the railway into a coherent and integrated development, which is the very essence of master planning.
- Just as significantly, the draft Plan appears to be based on apparent mistakes of fact as to land availability for development elsewhere, i.e. the larger site 435 to the east off Church Hill. This has been justified in two different ways – (a) that the land is not available for development in the lifespan of the Plan, which we understand is not correct; (b) that the land is less suitable on planning grounds than the south Saxmundham sites
- Despite requests, we have not been informed of any planning assessments that give rise to the conclusion that the Church Hill site(s) would be less suitable than the south Saxmundham sites. We believe that there needs to be clear evidence based on proper assessment before a rational conclusion can be reached on respective suitability.
- Moreover, we believe that there is or may be a strong case for a split development, with part taking place on the less environmentally sensitive area to the south which is west of the railway, i.e. close to the Free School area, and part on the land to the east off Church Hill. This would prevent the worst urban coalescence, enable the current Layers site to be preserved, and keep important ecological and other advantages.
- We do not consider that the present Garden Neighbourhood (GN) proposals in the draft Plan reflect the Garden City principles in a satisfactory way, and this adds to our non-acceptance of the GN based on other grounds. We are also extremely concerned at the apparent coalescence with Benhall, and on material variances in different versions of the GN site plans.

- We propose that the new housing requirement for Saxmundham for the next Plan period should be in the region of 400 to 600, which could be (we believe) accommodated in principle, and subject to detailed analysis of planning suitability, on the two sites (south/west of rail; east/Church Hill), to also include primary school and employment land.
- We believe the first focus must be on providing affordable homes for local people, including for younger people. This requires different sizes and tenures to meet the needs of different types of household. Since we have a significant population of older residents, housing needs also to reflect their needs.
- Housing also needs essential related infrastructure for - in particular – drainage, waste water, sewage and other utilities. We consider that specialist surveys are required before reaching firm final proposals.
- We support the overall strategy for Saxmundham in the draft Plan, save as set out here in relation to the proposed South Saxmundham Garden Neighbourhood.

Annex: Comparing Sax & Beccles indicative masterplans for Garden Neighbourhoods

SCDC first draft Local Plan:



Waveney DC first draft Local Plan:

Figure 14 - Beccles and Worlingham garden neighbourhood indicative masterplan

