Hi Jeremy,

Apologies for the delay in replying to you, myself and Anthony received the original email with the letter dated 24\textsuperscript{th} July 2018. Since the publication of the consultation period, the Planning Policy Team has been responding to queries and undertaking drop in sessions which to date have been very popular and well attended. In the email below, I have attempted to answer our queries in turn.

... Southern boundary of the Garden Neighbourhood: My apologies if you think I misled you when we met on the 12\textsuperscript{th} June in respect of the southern boundary, this was certainly not intentional. As you have seen in the consultation document the southern boundary is undefined as this will be dependent on site specific details, the amount of land needed for built development and the amount of land for green infrastructure. All issues to be considered through future master plans and supported by your Neighbourhood Plan.

Level of growth: the number of 800 units is specifically highlighted due to the need for a primary school. Suffolk County Council have long informed the Council that a development of 800 units would require a primary school and therefore the policy has been written in this context. If public consultation showed a preference for a lower quantum of growth this would need to be reconsidered in light of the strategy and the infrastructure led proposal.

Alternative site at Church Hill: the consultation response from the landowners agent indicates that a smaller area of land (with ability to accommodate 200 dwellings) was being made available. Any reference we made to land not being available was in respect of a larger site opportunity to the east of Saxmundham. Recent correspondence with the landowners and agents is claiming that the Council misinterpreted the original response. Through this round of consultation, should the landowner make more land available it may provide an alternative option which will be considered.

Master planning: The Council is looking to promote an comprehensive master plan approach for both Garden Neighbourhoods identified in the First Draft Local Plan. Master planning will provide opportunity for site specific details to be considered (once the principals have been established) in an open and transparent manner with direct involvement from the local community and Neighbourhood Planning groups. Any master plan will be guided by the policy requirements associated with the Local Plan policy. The crossing of the railway line for vehicular traffic is seen by officers as a key aspect of this Garden Neighbourhood and therefore is fundamental to the delivery of this site. Should the local community/Neighbourhood Plan group also consider this necessary I would encourage you to make representations along those lines.

Role of the Neighbourhood Plan: As we discussed, the Garden Neighbourhood is fundamental to the overall strategy for residential development across the district and therefore the principal needs to be established within the Local Plan. The Neighbourhood Plan will have a key role in helping to shape the details and specifics of the master plan anticipated for this area, should the Neighbourhood Planning group consider it appropriate to address residential issues. Should residential issues not be considered in the Neighbourhood Plan it could address other issues such as open space, town centre regeneration, protection of the historic environment, green infrastructure, community facilities or other land uses. The proposed allocation for a Garden Neighbourhood is not intended to marginalise the Neighbourhood Plan in any way.

I trust that my response is helpful to you at this stage? From today I am on leave until 22nd August, but if you have any further queries then please contact Anthony who will be able to assist.

We look forward to receiving the formal consultation response from the Neighbourhood Plan group in due course.

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From: Jeremy Smith
Sent: 24 July 2018 21:09
To: 
Subject: Draft Local Plan consultation - Letter from Saxmundham NP Steering Group requesting further information

Dear Mark,

I attach a letter on behalf of our NP Steering Group, making a number of comments and in particular requesting further information relevant to the Saxmundham proposals, notably for the new South Saxmundham Garden Neighbourhood. If you think it useful, I can sign and send it in as hard copy, but wanted to communicate at the earliest opportunity.

This matter was discussed at our Steering Group meeting yesterday, which authorised me to write on the Group’s behalf on these issues.

We wish to confirm that we are grateful for the communication and cooperation with your office, but the new proposals have raised many important issues, which we feel require more information to be able to respond to properly. You will see that we are strongly critical of the timing of the consultation....

With best wishes

Jeremy Smith
Chair, Saxmundham NP Steering Group

Extract from attachment letter from Jeremy Smith, also dated 24th July 2018:
The third issue relates to the issue of alternative sites. What came as a complete and unwelcome surprise to us at our meeting was the information you gave that the possible alternative site for significant development, up Church Hill, which had been shown as available in the earlier October consultation document, was no longer being considered as available by you for the new Local Plan, since the land-owners in question had not responded to your recent requests for confirmation that it was so available. You may recall that we expressed considerable concern at this, as we felt that a short-term lack of reply was no reason not to consider it, unless the land-owners had actually withdrawn it. Secondly, not considering this land meant that we – as a town – are being presented with a pure fait accompli which is the utter negation of the principle of localism and neighbourhood planning, which gives a large measure of local choice, within broad planning parameters set by the Local Plan. Moreover, as a Steering Group we had (have) been busy consulting locally on a range of key issues including different possible levels of quantum (Option 1, around 1200 new dwellings, Option 2, around 700-800, Option 3, around 300-500) and location – of which the southern area was one, and up Church Hill another.

We have now seen not only the actual proposal for the Garden Neighbourhood, but the short reasons given for not considering the larger part of the Church Hill option, as 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, this reasoning appears to indicate that a comparative site appraisal has been carried out, because no conclusion on suitableness could properly have been reached without this. If so, we would ask why we were not informed of this, and why (since it is known that we have been consulting on other options) we have not been given access to the comparative studies. Please can you make them available to us now. Secondly, we are perplexed as to why we were informed that the reason for the non-consideration of e.g. the bulk of 435 was non-response to letters asking whether the land was available, when it would appear that this was not the main reason.

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.”

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. We would ask if you have here relied on non-receipt of a letter to your inquiry, or in fact a positive refusal of the land-owner that supports this conclusion. If the latter, please provide us with full information.
The second half of the reasoning at this point raises a different point – namely that "Development across different locations would not provide the opportunity for a master planned approach to delivery of infrastructure".

If the ‘South Saxmundham Garden Neighbourhood’ is to proceed, after consultation, in anything like its present form, then our provisional view is that a master-planned approach is desirable, and we would be minded to support – provided it was implemented in an appropriate way. But one perfectly reasonable argument could be that the scale of development - notably on The Layers to the east of the railway – is too large, and that e.g. some of the reduction could be compensated by development on site 435. This would not, we believe, be a good argument against a master-planned approach for the South Saxmundham development, even if this is somewhat reduced.

In relation to master-planning of the South Saxmundham site, if it is to proceed, a central issue (almost literally) is the railway. There is an existing narrow bridge, which would be suitable for a cycleway but certainly not for motor traffic. We are clear that the site as a whole ‘Neighbourhood’ cannot be properly planned at all as a whole, or made to work satisfactorily from a planning perspective, unless there is a bridge (or other safe crossing) to connect motor traffic from the west side to the east side of the railway, and down to the A1121. Your current wording accepts that the crossing is essential, but in no way seems to guarantee this nor make it a condition precedent to the whole development:

"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."

Can you please confirm now, as it is such a key point, that a road transport crossing must be guaranteed, not just sought, as a condition precedent to the whole development, and fully implemented in the early period of such development? If not, our preliminary conclusion is that the whole development proposal will not meet the necessary requirements nor deliver the benefits as proposed. We need this information/confirmation from you at this stage, to enable us to respond appropriately to the consultation, and to consult with local people with accurate information on what the pros and cons and planning viability are of the proposals.

The Steering Group would, furthermore, given the scale of development envisaged for the town, as well as the specific nature and location of the main proposal, ask to be provided with the full range of planning-related documents, studies or reports etc. which have been commissioned, used or relied on in drawing up the plan in relation to the south Saxmundham Garden Neighbourhood proposal, to enable us to assess the evidence.

Finally, we would simply wish to inform at this stage that – whilst we have not completed our consultations, and need more feedback in particular from some sections of our local population – from the responses to date, there is a broad (but not universal) consensus that the town will/should grow in size to a significant extent, but that the favoured range is nearer to 500-800 new dwellings (increase of population of 1250-2000 over the period) rather than 1100. As you know, there is a lot of local opposition to any further building on The Layers site (i.e. east of the railway). We will keep you informed on how our consultation develops.

Having raised some complex and difficult issues, we would wish to close by indicating that on many other aspects of the draft Local Plan, we are confident that our response will be broadly supportive
on many issues. We will be looking closely, amongst other matters, at principles and proposals for
the town centre and local economy, as well as issues of housing size, type and design, and
sustainable transport etc.
Yours sincerely

Jeremy Smith
Chair, Steering Group