



Saxmundham Town Council

Minutes of the meeting of Saxmundham Town Council held on Monday 8th December 2025
at the Fromus Centre, Street Farm Road, Saxmundham at 7:00 pm.

Minutes

89/25TC Attendees

Cllr John Findlay (Chair)
Cllr Geraldine Barker (Vice Chair)
Cllr Marianne Kiff
Cllr John Fisher
Cllr James Sandbach
Cllr David Humphreys
Cllr Steve Peck
Cllr Georgina Burns
Cllr Laura Purina
Cllr Tim Lock

Apologies

Cllr Jeremy Smith - accepted
Cllr Elizabeth Clark - accepted

Also Present

Sharon Smith (Town Clerk)

90/25TC Declaration of Interests

There were no declarations of interest or requests for dispensations from members on matters in which they have a disclosable pecuniary interest, other registerable interest, or non-registerable interest.

91/25TC Open Forum

County Cllr Richard Smith sent apologies for absence. District Cllr John Fisher had nothing to report. There were no members of the public present.

92/25TC Minutes

It was **unanimously resolved** to approve the minutes of the meeting held on 10th November 2025

93/25TC National Association of Local Councils Star Council Awards

The Council noted that it has been shortlisted as finalists for 'Council of the Year' in the NALC Star Council Awards 2025-2026. The winners will be announced at a Parliamentary Reception in February 2026 at the House of Lords.

94/25TC Committee Minutes

The Council received the draft minutes from the:

- a) Civic and Community Committee meeting held on 6th November 2025.
- b) Planning and Development Control Committee meeting held on 10th November 2025.
- c) Amenities and Services Committee meeting held on 20th November 2025.

Signed _____ Date _____

95/25TC Nationally Significant Infrastructure Projects

- a) Cllr Geraldine Barker presented her written report on energy projects, which had been circulated in advance and is published on the Town Council's website. She further updated the Council on the outcomes of the most recent Sizewell C Southern Transport Forum, including updates on roadworks and the planned opening of the Park and Ride sites. Cllr Barker reported that she had raised a concern at the Forum regarding the potential for increased fly-parking arising from Sizewell C's provision of bus services collecting workers from Saxmundham railway station, which may encourage workers from neighbouring villages to park in the town. The Forum advised that the Fly-Parking Response Unit would respond promptly to any issues identified.
- b) The Council noted the Written Representation submitted for the Sea Link examination which had a deadline before the meeting date.
- c) It was **unanimously resolved** to approve responses to the East Suffolk Council and Suffolk County Council Local Impact Reports for the Sea Link examination.
- d) It was **unanimously resolved** to approve the response to the applicant's change request for the Sea Link examination regarding the proposed B1119 diversion route.
- e) It was **unanimously resolved** to approve the response to the Suffolk Water Recycling, Transfer and Storage Project non-statutory consultation.

96/25TC Local Government Reorganisation

- a) The Council received a report from the Town Clerk on Opportunities for Devolved Assets and Services and **unanimously resolved** to approve the recommendations set out in the report. It was noted that, should the proposed Garden Neighbourhood be approved, this could result in an increase in the number of Town Councillor seats and, on that basis, it was not approved to pursue this matter at this time.
- b) The Council noted the government's consultation on proposals for Local Government Reorganisation for Norfolk and Suffolk which closes on 11th January 2026.

97/25TC Strategic Planning

The Council reviewed and noted progress against the current year's Annual Delivery Plan. Following consideration of member contributions on future priorities, it was **unanimously resolved** to approve the Annual Delivery Plan for the forthcoming year.

98/25TC Finance

- a) The Council noted the schedule of payments and receipts together with the bank balances as at 30th November 2025.
- b) The Council received the budget versus actual income and expenditure report to 30th November 2025, including the year-end forecast.
- c) It was **unanimously resolved** to create new earmarked reserves to hold grant funding for the Destination Website - £4,275 and the Saxon Road Allotment Garden - £3,000.

Signed _____ Date _____

99/25TC Financial Year 2026-2027

- a) The Council received a report from the Town Clerk setting out the outcome of the staffing review and the recommended staffing restructure, as endorsed by the Resources Committee.
- b) It was **resolved by majority** to adopt the draft balanced budget of £312,781 for the financial year 2026–2027.
- c) It was **resolved by majority** to set the precept at £304,121 for 2026–2027, representing a 10% increase on last year’s precept, principally to increase staffing capacity to address current operational pressures. The cost to a Band D property will be £181.65 per annum (£3.49 per week), representing an increase of £16.51 per annum (£0.31 per week) compared with last financial year.
- d) The Council received an update from the Town Clerk regarding the Resources Committee’s original recommendation for an 11% precept increase for 2026–2027, and the subsequent use of an earmarked reserve which enabled the Town Council to approve a revised 10% increase.

100/25TC Policies

- a) It was **resolved by majority** to approve the annual review of the Community Events Policy.
- b) The Council conducted the annual review of the Civility and Respect Pledge and the Model Councillor-Officer Protocol.

101/25TC Next Meeting

The Council noted the date and time of the next meeting which is scheduled for Monday 12th January 2026 at 7:00 pm.

The meeting closed at 8:30 pm.

Sharon Smith
Town Clerk

Signed _____ Date _____



Saxmundham Town Council

Minutes of the meeting of the Resources Committee held on Tuesday 2nd December 2025
at the Town House, Station Approach, Saxmundham at 12:00 pm.

Minutes

68/25RC Attendees

Cllr Elizabeth Clark (Chair)
Cllr John Fisher
Cllr John Findlay
Cllr David Humphreys

Apologies

Cllr Tim Lock – not accepted

Also Present

Sharon Smith (Town Clerk)

69/25RC Declaration of Interests

None.

70/25RC Open Forum

None.

71/25RC Minutes

It was **unanimously resolved** that the minutes of the meeting held on 4th November 2025 are a true and accurate record.

72/25RC Monthly Reports

- a) It was **unanimously resolved** to approve the payments and note the receipts for November 2025.
- b) The Committee noted the bank balances as at 30th November 2025.
- c) The Chair verified the bank reconciliations as at 30th November 2025.
- d) The Committee reviewed the Budget versus Actual Income and Expenditure Report as at 30th November 2025, including the year-end forecast.

73/25RC Charitable Trusts

It was **unanimously resolved** to approve a request from the Gannon Institute Trust to release £2,898 from the earmarked contingency fund for expenditure to improve the thermal efficiency of the Gannon Rooms.

74/25RC Earmarked Reserves

It was **unanimously resolved** to recommend to the Town Council the creation of new earmarked reserves to hold grant funding for:

- a) Destination Website - £4,275
- b) Saxon Road Allotment Garden - £3,000

Signed _____ Date _____

75/25RC Investments

The Committee noted that from 1st December 2025 the Financial Services Compensation Scheme deposit protection limit will rise to £120,000 per authorised firm.

76/25RC Draft Budget 2026-2027

- a) Following due consideration, it was **unanimously resolved** to recommend a draft budget of £315,546 for the financial year 2026-2027 for approval to the Town Council.

- b) It was **unanimously resolved** to recommend approval of the 2026-2027 precept requirement of £306,886 to the Town Council, representing an 11% increase on last year's precept, principally to increase staffing resource to meet current operational pressures. The cost to a Band D property will be £183.31 per annum (£3.53 per week), an increase of £18.17 per annum (£0.34 per week) compared with last financial year.

77/25RC Next Meeting

The Committee noted the date and time of the next meeting which is scheduled for Tuesday 6th January 2026 at 12:00 noon.

The meeting closed at 12:50 pm.

Sharon Smith
Town Clerk/RFO

Signed _____ Date _____



Saxmundham Town Council

Minutes of the meeting of the Resources Committee held on Tuesday 6th January 2026
at the Town House, Station Approach, Saxmundham at 12:00 pm.

Minutes

78/25RC Attendees

CLlr Elizabeth Clark (Chair)
CLlr John Fisher
CLlr John Findlay

Apologies

CLlr Tim Lock – not accepted

Also Present

Sharon Smith (Town Clerk)

79/25RC Declaration of Interests

None.

80/25RC Open Forum

None.

81/25RC Minutes

It was **unanimously resolved** that the minutes of the meeting held on 2nd December 2025 are a true and accurate record.

82/25RC Monthly Reports

- a) It was **unanimously resolved** to approve the payments and note the receipts for December 2025.
- b) The Committee noted the bank balances as at 31st December 2025.
- c) The Chair verified the bank reconciliations as at 31st December 2025.
- d) The Committee reviewed the Budget versus Actual Income and Expenditure Report as at 31st December 2025, including the year-end forecast.

83/25RC Precept Increase 2026-2027

The Committee received an explanation from the Town Clerk regarding the Committee's original recommendation at its last meeting for an 11% precept increase for 2026–2027, and the subsequent use of an earmarked reserve which enabled the Town Council to approve a revised 10% increase at its December 2025 meeting.

84/25TC Budget Overspends

- a) It was **unanimously resolved** to approve expenditure for bespoke data protection training from Breakthrough Communications for all staff to support compliance with the requirements of AGAR Assertion 10, noting that the staff training budget for 2025-2026 is already overspent and that approval of this expenditure will increase that variance. It was further agreed that all Councillors be invited to attend the training session.

Signed _____ Date _____

- b) The Committee considered a staffing matter and its potential budgetary implications for 2026–2027. Following discussion, the Committee confirmed its commitment to the previously approved budget for 2026–2027 and resolved not to approve any amendment to that budget.

85/25TC Earmarked Reserve Expenditure

The Committee received an update from the Town Clerk on the earmarked reserve expenditure on new play equipment for Seaman Avenue play park.

86/25RC Next Meeting

It was **unanimously resolved** to the reschedule of the next Committee meeting from 3rd February 2026 to 10th February 2026 due to the Town Clerk's approved study leave.

The meeting closed at 12:55 pm.

Sharon Smith
Town Clerk/RFO

Signed _____ Date _____



Saxmundham Town Council

Minutes of the extra ordinary meeting of the Staffing Committee held on Friday 28th November 2025 at the Town House, Station Approach, Saxmundham at 1:00 pm.

Minutes

30/25SC Attendees

Cllr David Humphreys (Chair)
Cllr Elizabeth Clark
Cllr John Findlay

Apologies

Cllr Tim Lock – not accepted.
Cllr John Fisher - accepted

Also Present

Sharon Smith (Town Clerk)

31/25SC Exclusion of the Public

It was **unanimously resolved** that, under the Public Bodies (Admission to Meetings) Act 1960, the public and press be excluded from the meeting due to the confidential nature of the business to be transacted.

32/25SC Declaration of Interests

None.

33/25SC Minutes

It was **unanimously resolved** to approve the minutes of the meetings held on 2nd September 2025, 16th October 2025, and 4th November 2025 as true and accurate records.

34/25SC Matters Arising

With reference to minute 25/25SC of the meeting held on 16 October 2025, the Town Clerk advised that the disciplinary matter would be progressed under delegated authority, without further reference to the Committee unless required.

35/25SC Staffing Reports

- a) The Committee received the payroll records for September, October and November 2025.
- b) The Committee noted that the Assistant Town Clerk has reduced her contracted hours by 5 hours per week with immediate effect. It was noted that a formal variation to contract will be issued in due course and that her duties will be reviewed to ensure they remain appropriate and manageable within the revised hours.
- c) The Committee noted the redeclaration of compliance with the Pensions Regulator.
- d) The Committee noted the successful completion of the Environment Coordinator's annual appraisal.

36/25SC Personal Development

- a) The Committee noted the Town Clerk's successful completion of the Institute of Leadership and Management Level 3 Award.

Signed _____ Date _____

b) The Committee noted the Town Clerk's enrolment on a two-year, part-time, distance-learning MA in Public Leadership. It was **unanimously resolved** to approve her request for additional paid study leave to enable attendance at the mandatory residential study days. The Committee further noted that requests for training and study leave from other members of staff will be considered on a case-by-case basis, in accordance with the Council's training and development arrangements.

c) The Committee noted that the Town Clerk has been appointed by the Suffolk Association of Local Councils as an Internal Auditor, contracted under a Service Level Agreement to conduct internal audits of local councils outside of her contracted working hours for the Town Council.

d) The Committee received an update about the Deputy Town Clerk's progress with the Certificate in Local Council Administration qualification.

37/25SC Staff Wellbeing

a) The Committee received a progress update on the development of an Employee Assistance Programme and the establishment of a Staff Wellbeing Register. It was noted that the Suffolk Association of Local Councils will provide further advice in due course regarding the potential availability of an Employee Assistance Programme for member councils. The Committee also noted that the Staff Wellbeing Register has not yet been implemented due to competing priorities and current time constraints, and that this will be progressed when capacity allows.

b) The Committee considered the need for occupational health assessments for three members of staff, noting that this matter arose from disclosures made during the consultation period but relates to their usual working arrangements rather than the staffing restructure proposal. The Committee reviewed the quotations received and **unanimously resolved** to accept the quotation from Gipping Occupational Health and Wellbeing and to offer, on a voluntary basis, an occupational health assessment to the relevant staff.

38/25SC Staffing Restructure

a) The Committee noted the consultation notes and correspondence received as part of the staff consultation process. It was **unanimously resolved** that the Town Clerk will consider the representations received and determine appropriate responses to the individual questions and suggestions raised.

b) The Committee noted the advice received from WorkNest regarding the next steps in the process.

c) The Committee received the Town Clerk's progress report on the staffing review. The draft job descriptions were not considered at this meeting and would be reviewed at a later stage, if required.

d) The Committee considered the draft financial analysis of the staffing options for 2026/27, including the impact of each option on the overall draft Town Council budget.

e) Having considered the operational and financial implications, it was **unanimously resolved** to recommend to Town Council the Town Clerk's preferred staffing option, namely to increase the contracted hours of the Deputy Town Clerk and the Community Officer with effect from 1 April 2026, as a proportionate and financially sustainable means of relieving current operational pressures.

39/25SC Next Meeting

The Committee noted the date and time of the next meeting which is scheduled for Friday 27th February 2026 at 1:00 pm.

The meeting closed at 2:30 pm.

Sharon Smith, Town Clerk

Signed _____ Date _____

Joe McGarvey

I am a local resident of Saxmundham and wish to be considered for co-option to the Town Council.

I live in Saxmundham and I intend to stay here long term. This is my home, and I am interested in contributing to the town in a practical and responsible way.

I am putting myself forward for the role of Town Councillor to support the work of the Council and to better understand how local decisions are made. I am not coming with an agenda. My aim is to listen, learn, and work within the Council's procedures to help make sound decisions in the interests of the town.

I understand that local government involves patience, detailed work and careful consideration rather than quick outcomes. I am used to working within set procedures and understanding why they matter and I am comfortable with that pace and prepared to put in the time and effort required to do the role properly, including training and committee work.

I take responsibility for the work I do and I am willing to learn how things are done, even when the work is unglamorous. I believe that trust is built through reliability, and respect.

If appointed, I would focus on learning the role properly, listening to residents, working within the Council's framework, and contributing in a steady and constructive way.

SAXMUNDHAM TOWN COUNCIL - COMMITTEE MEMBERSHIP 2025-2026

Committee	Town Council	Resources	Amenities and Services	Civic and Community	Planning and Development Control	Staffing	Neighbourhood Plan Steering Group	Gannon Institute Trust	Market Hall Trust	Market Hall Redevelopment Working Group
Cllr John Findlay	x	x		x		x	x	x	x	x
Cllr Geraldine Barker	x			x	x		x	x	x	
Cllr Elizabeth Clark	x	x	x		x	x		x	x	
Cllr Tim Lock	x	x	x	x		x		x	x	x
Cllr John Fisher	x	x			x	x		x	x	
Vacancy										
Cllr Jeremy Smith	x						x	x	x	
Cllr James Sandbach	x			x				x	x	
Cllr Marianne Kiff	x		x		x			x	x	x
Cllr Laura Purina	x			x	x			x	x	
Cllr Georgina Burns	x			x				x	x	x
Cllr Steve Peck	x			x				x	x	

The Chair and the Vice-Chair are ex-officio members of all Committees.

Saxmundham Town Council

12th January 2026

Item 7a and b

Report by Cllr Jeremy Smith, Chair of Neighbourhood Plan Steering Group

Modified Neighbourhood Plan

1. At its meeting on 9th June, the Town Council unanimously resolved to approve the Regulation 14 Pre-Submission Draft Modified Neighbourhood Plan for submission to the local planning authority and to commence the statutory consultation. The consultation period took place from late June to 15th August, including an exhibition at the Market Hall on 27th and 28th June. Various means were used to inform local people and businesses and communicate with them, including via social media and press statements. Paper copies of the draft Modified Neighbourhood Plan (MNP) were also available. Notice of the consultation was also given, as required, to a wide range of statutory consultees.

2. A substantial number of responses were received, including detailed comments from East Suffolk Council and Pigeon, the potential developer of the South Saxmundham Garden Neighbourhood. These have all been carefully considered by the Neighbourhood Plan Steering Group (NPSG).

3. To recall, the main changes in the MNP from the Plan ‘made’ following local referendum in 2023 are as follows:

(a) the MNP covers the area formed with the new parish boundary, which was extended from April 2023 to cover the anticipated area of the new Garden Neighbourhood-related development (but includes no new population); the demographic data have also been updated to draw on the 2021 census data for Saxmundham;

(b) Given that the parish now includes the whole of the Garden Neighbourhood area, as allocated in the Suffolk Coastal Local Plan, the MNP provides more detailed information and policies for the whole Garden Neighbourhood, in a new Chapter 12 on the subject.

(c) the MNP also includes a new Chapter 13 including on “Mitigating the impacts of National Infrastructure and Energy Projects”, including a new policy which aims to minimise their impact, if they proceed, and promote mitigation measures.

4. Following consultation, some important changes have been made by the NPSG – in the light of the representations and comments received - to the text of the now-proposed Submission Version of the MNP, though the overall purposes and scope remain the same as in the June version. In particular:

(i) specific references to the current development (including Masterplan) proposals from Pigeon have been removed, since the actual Local Plan policy and land allocation are those contained in the Suffolk Coastal Local Plan of 2020; this means that we have also removed direct references to Pigeon’s commercial or road services development proposals for land to the west of the A12 (i.e. going beyond the Local Plan’s “employment area allocation).

(ii) There are also changes to the drafting of Chapter 13, including the new policy on mitigation etc., to take into account representations received and to improve its overall clarity.

5. A full summary of all the representations and comments received, together with the proposed response to each, can be found in the Appendix 3(c) to the Consultation Statement, which we are required to provide together with the Submission Version of the MNP.

6. The Neighbourhood Planning (General) Regulations 2012 (as amended) set out the requirements for documentation to be provided by the Town Council, as 'qualifying body' for this purpose, along with the Submission Version of the Modified Neighbourhood Plan:

(a) a map or statement which identifies the area to which the proposed MNP relates;

(b) a consultation statement;

(c) a 'basic conditions statement' explaining how the MNP meets the legally defined requirements – this has been drafted by our consultants;

(d) where it has been determined that the MNP is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment (EA)), a statement of reasons for the determination – East Suffolk Council has provided its advice that an EA is not required which the Town Council may wish to rely on, including adopting its reasons;

(e) a statement setting out whether or not the Town Council as qualifying body consider that the modifications contained in the MNP are so significant or substantial as to change the nature of the existing NP, giving reasons for why the qualifying body is of this opinion. [If the modifications are deemed – ultimately by the Examiner – to change the nature of the NP, then another local referendum will be required]

7. The 'consultation statement' under (b) above must:

(a) contain details of the persons and bodies who were consulted about the proposed MNP

(b) explain how they were consulted;

(c) summarise the main issues and concerns raised by the persons consulted; and

(d) describe how these issues and concerns have been considered and, where relevant, addressed in the proposed MNP.

8. Of the above requirements, a map showing the designated area for the MNP is to be found at Appendix 1 of the consultation statement, which is attached. The basic conditions statement is has been prepared by our consultants, and will be included in the documentation submitted by the Town Clerk with the Submission Version. The statement required under (d) requires the Town Council to give its opinion, and a draft report on this aspect has been drawn up for councillors to consider and decide upon.

9. The NPSG has, with the help of our consultants, carefully studied all the responses to the consultation version of the MNP, and has agreed to make changes that appeared justified and appropriate, including clarifications and corrections where necessary. The overall substance of the MNP has not changed from the June version, and while some amendments to the policies in the new MNP sections (Chapters 12 and 13) have been made, no further policies have been included in the Submission Version which were not in the earlier (June) Consultation Version.

10. The NPSG accordingly recommends that the Town Council, if so minded, approves the Modified Neighbourhood Plan for submission to East Suffolk Council, together with the requisite accompanying documents, under Article 15 of the Neighbourhood Planning (General) Regulations 2012.

Recommendations:

That the Town Council

1. Accept the recommendation from the Neighbourhood Plan Steering Group to approve the Submission Version of the Modified Neighbourhood Plan for submission to East Suffolk Council.

2. Approve the following supporting documents as required under Article 15 of the Neighbourhood Planning (General) Regulations 2012, for submission to East Suffolk Council:

(a) Consultation document, including the map of the designated area for the Modified Neighbourhood Plan;

(b) Basic conditions statement;

(c) A statement that, having regard to the Screening Opinion of East Suffolk Council dated October 2025, the Town Council considers that the Modified Neighbourhood Plan is unlikely to have significant environmental effects, and adopts the reasons contained in that Opinion for this determination;

(d) A statement that, for the reasons set out in the statement, the Town Council as qualifying body does not consider that the modifications contained in the MNP are so significant or substantial as to change the nature of the existing NP, giving reasons for why the qualifying body is of this opinion.

3. Delegate authority to the Town Clerk,

(a) to work with the relevant neighbourhood planning liaison officer of East Suffolk Council to ensure that all the documentation for submission is in place and in correct form,

(b) in consultation with the Chair of the Council and of the Neighbourhood Plan Steering Group to make any minor changes or improvements to the approved documents for submission;

(c) to submit the finalised approved documentation, including the Submission Version of the Modified Neighbourhood Plan, to East Suffolk Council.

Modified Saxmundham Neighbourhood Plan **Basic Conditions Statement**

To accompany the Modified Saxmundham Neighbourhood Plan
submission version, for examination

December 2025

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1. Introduction

- 1.1 When submitting a Neighbourhood Plan to the Local Authority (in this case East Suffolk Council), it is a requirement that the Plan be accompanied by a number of supporting documents. One of these is commonly referred to as the 'Basic Conditions Statement.' Only a Neighbourhood Plan that meets each of the basic conditions can be put to referendum and if successful, be used to assist in the determination of planning applications.
- 1.2 This Basic Conditions Statement is prepared for use by East Suffolk Council and the Independent Planning Examiner, to assist in making this assessment about the basic conditions.
- 1.3 This Basic Conditions Statement accompanies the Modified Saxmundham Neighbourhood Plan which modifies the Saxmundham Neighbourhood Plan which was 'made' in July 2023.

2. Legal Requirements

Legal Requirements: The Modified Saxmundham Neighbourhood Plan is compliant with The Planning and Compulsory Purchase Act 2004 38A (1) & (2) and 38B (a)-(c) (as amended).

Qualifying Body: The Modified Saxmundham Neighbourhood Development Plan is being submitted by a qualifying body – Saxmundham Town Council. Saxmundham Town Council was confirmed as the qualifying body by East Suffolk Council on 30th April 2024 when the Neighbourhood Plan Area for the Modified Saxmundham Neighbourhood Plan was designated.

A Neighbourhood Development Plan: The Saxmundham Neighbourhood Development Plan is a neighbourhood development plan. It relates to planning matters (the use and development of land) and has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012.

The time-period covered: The Saxmundham Neighbourhood Plan states the time-period for which it is to have effect (from 2022-2036) a period of 14 years.

Excluded Development: The Saxmundham Neighbourhood Development Plan policies do not relate to excluded development. The Saxmundham Neighbourhood Development Plan does not deal with County Matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.

Area of the Neighbourhood Plan: The Saxmundham Neighbourhood Development Plan relates to the Saxmundham Town Council's Neighbourhood Area and to no other area. There is an existing Neighbourhood Plan in place for part of this area (the 2023 Saxmundham Neighbourhood Plan) and this Modified Saxmundham Neighbourhood Plan is seeking to modify that 2023 Saxmundham Neighbourhood Plan. It should be noted that the Neighbourhood Area for the 2023 Saxmundham Neighbourhood Plan was the civil Parish Boundary in force at that time, which was smaller than that being used for the Modified

Saxmundham Neighbourhood Plan. The parish boundary was expanded following a Community Governance Review which concluded in April 2023. The Neighbourhood Area for the Modified Saxmundham Neighbourhood Plan uses the amended Parish Boundary.

3. Modifying a made Neighbourhood Plan

- 3.1 The Neighbourhood Planning Act 2017 contains provisions to amend Section 38 of the Planning & Compensation Act 2004 in relation to modifying a made neighbourhood plan. As a result, the Neighbourhood Planning (General) & Development Management Procedure (Amendment) Regulations 2017, which came into force on 31 January 2018, amended the Neighbourhood Planning (General) Regulations (as amended) 2012 for this purpose.
- 3.2 Those amendments enable a qualifying body to propose modifications to a made neighbourhood plan that, if considered not to be so significant or substantial as to change the nature of the neighbourhood development plan, requires only an independent examination and not another referendum. The 2017 Regulations amend Regulations 14 to 20 of the 2012 Regulations so that the process for preparing, consulting on, submitting, publicising and examining such modifications matches that for neighbourhood plans in general.
- 3.3 However, Regulation 15 has been amended to require the qualifying body to publish a statement alongside the neighbourhood plan as proposed to be modified at the Submission stage thus:
“setting out whether or not the qualifying body consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the qualifying body is of this opinion.”
- 3.4 Saxmundham Town Council published such a Statement to accompany the Regulation 14, Pre-Submission Version of the Modified Saxmundham Neighbourhood Plan. Following the conclusion of the Pre-Submission Consultation the statement has been updated to reflect the Submission Version of the Modified Saxmundham Neighbourhood Plan and this is to be submitted to East Suffolk as a separate document to this Basic Conditions Statement.
- 3.5 The 2023 Saxmundham Neighbourhood Plan contains 20 policies. The modified Saxmundham Neighbourhood Plan proposes to introduce five new policies. Four of these relate to the development of the proposed South Saxmundham Garden Neighbourhood (Policies SAXGN1-4), which now lies within the Saxmundham Parish Boundary) and the other policy (Policy SAXEN1) relates to National Infrastructure and Energy Projects. There are also minor modifications proposed to some of the existing parish wide policies which have either been at the request of statutory consultees or as a consequence of a need to update or correct them. These amendments do not fundamentally alter the direction of those policies.
- 3.6 This Statement focuses on explaining how the modified and new policies meet the basic conditions.

4. Basic Conditions

- 4.1 Paragraph 8(2) of Schedule 4B in the Town and Country Planning Act 1990 (as amended by Schedule 10 of the Localism Act 2011) sets out a series of requirements that Neighbourhood Plans must meet. These 'basic conditions' are set out below.
- 4.2 A draft Plan meets the basic conditions if –
- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan (see below).
 - (b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order (applies in relation to a Listed Building only insofar as the order grants planning permission for development that affects the building or its setting (not applicable in respect of the Modified Saxmundham Neighbourhood Plan)).
 - (c) Having special regard to the desirability of preserving or enhancing the character or appearance of the Conservation Area it is appropriate to make the order (applies in relation to Conservation Areas only) insofar as the order grants planning permission for development in relation to buildings or land in the area (not applicable in respect of the Modified Saxmundham Neighbourhood Development Plan).
 - (d) The making of the Plan contributes to the achievement of sustainable development (see below).
 - (e) The making of the Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). (see below).
 - (f) The making of the Plan does not breach and is otherwise compatible with EU obligations (see below) and,
 - (g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with, in connection with the proposal for the plan (see below).

Note: The Levelling up and Regeneration Act 2023, introduces a replacement Basic Condition to replace (e) above as follows. This is yet to be formally enacted but nevertheless has been considered by this statement:

- e) (a) the making of the order/Plan would not have the effect of preventing development from taking place which
 - (i) is proposed in the development plan for the area of the authority (or any part of that area), and
 - (ii) if it took place, would provide housing

- 4.3 Where applicable each of these basic conditions is addressed below. For clarification it should be noted that b) and c) above are not applicable to the Modified Saxmundham Neighbourhood Development Plan and refer to 'Neighbourhood Orders' only.

5. Compliance with Basic Conditions a) Having regard to National Policies and Advice and Basic Condition e) Conformity with Strategic policies in the Development Plan

- 5.1 The following table provides an appraisal of the extent to which the Modified Saxmundham Neighbourhood Plan has regard to national policy and is in general conformity with strategic local policy.
- 5.2 The 2023 Neighbourhood Plan policies were drafted to be in conformity with the National Planning Policy Framework published in July 2021. Since the 2023 Neighbourhood Plan was made, there have been two revisions to the National Planning Policy Framework – one in December 2023 and the other in December 2024. Therefore the table below assesses the degree of regard that the Modified Saxmundham Neighbourhood Development Plan policies have had to the most up to date version which is NPPF 2024. (Column B).
- 5.3 The strategic policies for the area are unchanged and are contained in the East Suffolk Council – Suffolk Coastal Local Plan (SCLP) which was adopted in September 2020. The Modified Neighbourhood Plan policies has been assessed against the relevant policies in the Local Plan at Column C.
- 5.4 In summary, the appraisal demonstrates that the Modified Saxmundham Neighbourhood Development Plan has had appropriate regard to and is in general conformity with, both national and strategic policy.
- 5.5 The Modified Neighbourhood Plan is positively prepared and is consistent with the new Basic Condition e(a) i) above as although it does not make additional allocations on top of that already committed through the strategic policies, it does not prevent development from coming forward. In summary, the appraisal demonstrates that the Modified Saxmundham Neighbourhood Plan has had appropriate regard to and is in general conformity with, both national and local strategic policy.

Assessment of policies in the Saxmundham Neighbourhood Plan against National and Local strategic policies

Column A Saxmundham Neighbourhood Development Plan Policy	Column B NPPF December 2024	Column C East Suffolk Council – Suffolk Coastal Local Plan – Adopted 2020
<p>SAX1: General design principles</p> <p>This policy is unchanged</p>	<p>This policy reflects NPPF para 131 which sets out the design criteria that development should meet for example ‘visually attractive as a result of good architecture, layout and appropriate and effective landscaping’, ‘sympathetic to local character and history, including the surrounding built environment and landscape setting while not preventing or discouraging appropriate innovation or change’...‘create places that are safe, inclusive...with a high standard of amenity...and where crime and the fear of crime do not undermine the quality of life or community cohesion or resilience’.</p> <p>The policy requires that all new development reflects the town’s local distinctiveness and character and seeks to enhance its quality. It sets out the key criteria for achieving this. The policy is supported by the Saxmundham Design Guidelines and Codes for the Garden Neighbourhood and the Neighbourhood Plan Area document.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP11.1 Design Quality which supports locally distinctive and high-quality design that clearly demonstrates an understanding of the key features of local character and seeks to enhance these features through innovative and creative means.</p> <p>Policy SAX1 requires that all new development reflects the town’s local distinctiveness and character and seeks to enhance its quality. It sets out the key criteria for achieving this. The policy makes specific reference to support for proposals that incorporate eco-friendly, innovative, or contemporary designs.</p> <p>The policy is supported by the Saxmundham Design Guidelines and Codes for the Neighbourhood Plan Area.</p>
<p>SAX2: Expansion of existing business</p> <p>This policy is unchanged</p>	<p>This policy reflects NPPF para 85, which indicates that significant weight should be given to the need to support economic growth.</p> <p>Policy SAX2 reinforces a commitment to employment and business within the town and encourages the small-scale expansion of existing businesses subject to criteria.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP4.1 Existing Employment Areas which supports new development for employment uses at existing Employment Areas .</p> <p>Policy SAX2 reinforces a commitment to employment within the town and encourages the small-scale expansion of existing businesses subject to criteria.</p>

<p>SAX3: New businesses</p> <p>Minor amendment to last paragraph</p>	<p>This policy reflects NPPF para 85, which indicates that account should be taken of local business needs and wider opportunities for development. The NPPF also indicates that an area should be allowed to build on its strengths and counter any weaknesses and address the challenges of the future.</p> <p>Policy SAX3 identifies a variety of employment sectors that will be supported.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP4.2 New Employment Development which supports new employment opportunities which provide greater choice of economic opportunities and Policy SCLP12.28 – Strategy for Saxmundham, criterion c) which seeks to diversify and expand employment opportunities.</p> <p>Policy SAX3 indicates support for a variety of employment sectors considered to be important to the town.</p>
<p>SAX4: New Community Facilities</p> <p>Minor addition to include cross reference to Policy SAXGN3</p>	<p>This policy is consistent with criterion c of paragraph 98 which urges planning policies to “guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”.</p> <p>Policy SAX4 seeks to resist the loss of community facilities unless suitable alternative provision exists or can be provided elsewhere.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP8.1 Community Assets and Facilities which seeks to resist the loss of valued community facilities and assets subject to criteria governing viability and replacement facilities.</p> <p>Policy SAX4 seeks to resist the loss of community facilities unless suitable alternative provision exists or can be provided elsewhere.</p>
<p>SAX5: Improving connectivity</p> <p>Some text relating to the Garden Neighbourhood has been relocated to new Policy SAXGN1</p>	<p>This policy is consistent with paragraph 96 (c) of the NPPF which supports healthy lifestyles through encouraging walking and cycling and paragraph 109 (e) which promotes opportunities for walking and cycling.</p> <p>Policy SAX5 specifically refers to the need for new developments to contribute to the health and wellbeing of residents by increasing levels of walking and cycling and to the provision of safe and attractive pedestrian and cycle routes and crossings.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP7.1 Sustainable Transport which requires new development to be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services, and facilities and provides safe pedestrian and cycle access to services and facilities.</p> <p>Policy SAX5 specifically refers to the need for new developments to contribute to the health and wellbeing of residents by increasing levels of walking and cycling and to the provision of safe and attractive pedestrian and cycle routes and crossings.</p>

<p>SAX6: Public Rights of Way</p> <p>This policy is unchanged</p>	<p>This policy is consistent with paragraph 111d) of the NPPF which encourages planning policies to provide for attractive and well-designed walking and cycling networks.</p> <p>Policy SAX7 seeks to protect and enhance existing public rights of way and where these may be lost requires appropriate new routes and diversions which are safe and convenient for users.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP7.1 criterion f) which seeks to ensure that development is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network.</p> <p>Policy SAX6 seeks to protect and enhance existing public rights of way</p>
<p>SAX7: Parking provision</p> <p>Minor amendments to include cross reference to Poicy SAXGN4</p>	<p>This policy is consistent with paragraph 112 of the NPPF which indicates that parking standards should take account of the accessibility of the development, the type and mix, the availability of public transport and local car ownership levels.</p> <p>Policy SAX7 refers to residential and non-residential parking and encourages the use and installation of electric charging points. The policy refers to the adopted parking standards of East Suffolk Council.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP7.2 Parking Proposals and Standards which seeks to ensure that vehicle parking provision is protected and managed and indicates that the level of parking provision required will depend on the location, type, and intensity of use.</p> <p>Policy SAX7 refers to residential and non-residential parking and encourages the use of installation of electric charging points. The policy refers to the adopted parking standards of East Suffolk Council.</p>
<p>SAX8: Windfall and Infill development</p> <p>This policy is unchanged</p>	<p>This policy is consistent with NPPF paragraph 30 which indicates that Neighbourhood Plans should not promote less development than that set out in the strategic policies for the area.</p> <p>The Neighbourhood Plan does not make any specific allocations but instead includes criteria that new housing development needs to meet. The policy allows for windfall development within the settlement boundary subject to criteria, which would allow for development be over and above the existing commitment provided for in the adopted Local Plan.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP5.7 Infill and Garden development that sets out the criteria for infill development including garden land.</p> <p>Policy SAX8 includes more localised criteria for governing windfall or infill development such as size, scale, location, residential amenity, logical boundaries and requiring a functional relationship with adjacent development. Backland or tandem development will only be supported subject to criteria and where it would not have an adverse effect on the character of the area.</p>
<p>SAX9: Tenure Blind Housing Development</p>	<p>This policy reflects NPPF para 63 which advises that planning policies should reflect the needs of ‘those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP5.8 Housing Mix which set out the preferred housing mix for the district as a whole and SCLP12.28 criterion f) which seeks to increase the provision of housing including affordable housing to</p>

<p>This policy is unchanged</p>	<p>homes and people wishing to commission or build their own homes’.</p> <p>The policy seeks to ensure that where affordable housing is to be provided that it should be indistinguishable from other tenures in external form, quality and character.</p>	<p>ensure a greater choice in the mix of housing available. This includes a focus on smaller properties (1-2 bedrooms) , accessible housing and housing for older people.</p> <p>The policy seeks to ensure that where affordable housing is to be provided that it should be indistinguishable from other tenures in external form, quality and character.</p>
<p>SAX10: Historic town centre and Conservation Area</p> <p>This policy is unchanged</p>	<p>This policy is in accordance with NPPF paragraphs 202-221, which collectively seek to conserve and enhance designated heritage assets such as Listed buildings and Conservation Areas.</p> <p>Policy SAX10 seeks to control development that would affect designated heritage assets (the Conservation Area and Listed Buildings) or their setting and promotes the use of high-quality materials and attractive public realm, through the provision of specific advice on shopfronts and signage.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP11.3 Historic Environment, SCLP11.4 Listed Buildings and SCLP11.5 Conservation Areas which seeks to ensure where possible that development makes a positive contribution to the historic environment.</p> <p>Policy SAX10 provides a more localised dimension and relates this general principle to the Listed Buildings and Conservation Area of Saxmundham where it provides some specific guidance for applications affecting heritage assets including public realm, materials, shopfronts, and signage.</p>
<p>SAX11: Non designated heritage assets</p> <p>This policy is unchanged</p>	<p>This policy reflects NPPF paragraph 216 which outlines the approach to assessing the impact of applications on non-designated heritage assets. ‘In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.’</p> <p>The policy identifies 15 Non-Designated Heritage Assets within the Town that are important to the local character of the area. Each proposed NDHA has been assessed using the Historic England listing criteria and guidance.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP11.6 Non-Designated Heritage Assets which sets out the criteria for dealing with applications that affect Non-Designated Heritage Assets.</p> <p>Policy SAX11 provides a local dimension and identifies 15 potential NDHA which have been assessed using the Historic England guidance.</p>

<p>SAX12: Gateways, views, and the landscape setting of Saxmundham</p> <p>This policy is unchanged</p>	<p>This policy reflects NPPF para 135 b) and c) which require planning policies to ensure that developments are ‘visually attractive as a result of ‘appropriate and effective landscaping’...and are sympathetic to ...the surrounding built environment and landscape setting’. In addition paragraph 187 a) of the framework which advocates ‘protecting and enhancing valued landscapes ‘and NPPF paragraph 187 b) which recognises the need to contribute to and enhance the intrinsic character and beauty of the countryside’.</p> <p>Policy SAX12 seeks to ensure that visual and scenic value of the landscape outside of the settlement boundary is protected from development that may adversely affect its character. The policy also identifies 4 specific town gateways which should be maintained as ‘green’ entrances to the town and 6 important local views which should be conserved and enhanced</p> <p>.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP10.4 Landscape Character which seeks to ensure that development proposals are informed by landscape character assessments and SCLP10.5 Settlement Coalescence which seeks to resist the coalescence of settlements.</p> <p>Policy SAX12 adds a local dimension and seeks to ensure that visual and scenic value of the landscape outside of the settlement boundary is protected from development that may adversely affect its character. Furthermore the loss of individual settlement distinctiveness and identity through coalescence of settlements is not supported.</p> <p>The policy also identifies 4 specific town gateways which should be maintained as ‘green’ entrances to the town and 6 important local views which should be conserved and enhanced</p>
<p>SAX13: Protection and enhancement of natural assets</p> <p>This policy is unchanged</p>	<p>This policy is consistent with paragraph 187 (d) of the NPPF which requires planning policies to minimise impacts on and provide net gains for biodiversity. In addition paragraph 192 (b) of the NPPF refers to the pursuit of opportunities for biodiversity net gains.</p> <p>Policy SAX13 seeks to protect and enhance existing ecological networks and wildlife corridors and supports proposals that provide a net gain in biodiversity. In addition the policy encourages the incorporation of features and planting that will add value to wildlife .</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP10.1 Biodiversity and Geodiversity which supports development that maintains, restores, or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity. The policy is also in conformity with Policy SCLP1 2.28 criterion e) which seeks enhancements to networks of green infrastructure and h) which seeks to protect and enhance the natural environment.</p> <p>Policy SAX13 has been prepared in the context of the Environment Act 2021 and seeks to protect and enhance existing ecological networks and wildlife corridors and supports proposals that provide a net gain in biodiversity. In addition the policy encourages the incorporation of features and planting that will add value to wildlife.</p>
<p>SAX14: Community</p>	<p>This policy is consistent with paragraph 8b of the NPPF which outlines the social objective of the NPPF and specifically highlights</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP8.2 Open Space and SCLP8.3 Allotments which seek to</p>

<p>gardens and allotments</p> <p>This policy is unchanged</p>	<p>the need for “accessible services and open spaces that reflect current and future needs and supports communities’ health, social and cultural well-being”. It is also consistent with paragraph 103, which highlights the importance of open spaces (such as allotments and community gardens).</p> <p>Policy SAX14 requires that new development make provision for community gardens or allotments to allow the opportunity for residents to grow their own food.</p>	<p>safeguard existing spaces and encourages the provision of allotments.</p> <p>Policy SAX14 requires that new development make provision for community gardens or allotments to allow the opportunity for residents to grow their own food.</p>
<p>SAX15: Green Spaces</p> <p>Minor wording change to reflect a name change of a building for LGS 7</p>	<p>This policy reflects NPPF paras 106-108 which advocates ‘The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them’.</p> <p>Policy SAX15 identifies 10 proposed Local Green Spaces which have been assessed against the criteria in the NPPF. In addition the policy proposes an area of land to the south of the town (The Layers) as an area of Suitable Alternative Natural Greenspace (SANG) which is required to act as mitigation for the potential recreational and disturbance impacts of the Garden Neighbourhood on sensitive protected nature conservation sites.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP8.2 Open Space which seeks to safeguard existing open space and enables Neighbourhood Plans to identify Local Green Spaces.</p> <p>In addition Policy SCLP12.29 criterion d) refers to the need for the provision of SANG within the Garden Neighbourhood to mitigate impacts on European Protected Sites.</p> <p>Policy SAX15 identifies 10 proposed Local Green Spaces which have been assessed against the criteria in the NPPF. In addition the policy proposes an area of land to the south of the town (The Layers) as an area of Suitable Alternative Natural Greenspace (SANG) which is required to act as mitigation for the potential recreational and disturbance impacts of the Garden Neighbourhood on sensitive protected nature conservation sites.</p>
<p>SAXGN1: Connecting the garden neighbourhood</p> <p>NEW POLICY</p>	<p>This policy is consistent with NPPF paragraph 77 which indicates that the supply of large numbers of new homes can often be best achieved through planning for larger scale development , such as...significant extensions to ...towns provided they are well designed and supported by the necessary infrastructure and facilities including a genuine choice of transport modes. Furthermore paragraph 77 c) refers to the need to set clear expectations for the quality of places to be created and how this</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP12.29 South Saxmundham Garden Neighbourhood which allocates the Garden Neighbourhood and sets out how it should be developed. The policy includes broad criteria relating to community facilities, SANG, green infrastructure, open space, rights of way, biodiversity networks, dementia friendly design, heritage, flooding, and access.</p>

	<p>can be maintained (such as following Garden City principles) and ensure that appropriate tools and design guides or codes are used.</p> <p>Policy SAXGN1 specifically addressed the issue of connectivity – both between the garden neighbourhood and the town and its community, the wider countryside but also within the garden neighbourhood itself. The policy identifies new pedestrian and cycle connections between the site and the town, bus stop provision, circular routes, and new rights of way together with new crossing points.</p>	<p>Policy SAXGN1 adds a further local dimension to the policy framework and is chiefly concerned with connections both within the Garden Neighbourhood and between it and the town and also the wider countryside. It identifies specific pedestrian and cycle routes that should be provided.</p> <p>The policy acknowledges the collaborative masterplan referred to in the Local Plan to be produced with landowner collaboration and community engagement.</p>
<p>SAXGN2: Green infrastructure</p> <p>NEW POLICY</p>	<p>This policy is consistent with NPPF paragraph 77 c) which refers to the need to set clear expectations for the quality of places to be created and how this can be maintained (such as following Garden City principles) and ensure that appropriate tools and design guides or codes are used. Furthermore NPPF paragraph 135 b) requires that developments be visually attractive as a result of good architecture, layout, and appropriate and effective landscaping. Paragraph 103 of the NPPF indicates that access to a network of high-quality open spaces is important for the health and well-being of communities.</p> <p>Policy SAXGN2 specifically addresses the issue of green infrastructure provision in the Garden Neighbourhood and specifically identifies a series of green links and spaces that should be incorporated into the layout of the Garden Neighbourhood.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP12.29 South Saxmundham Garden Neighbourhood which allocates the Garden Neighbourhood and sets out how it should be developed. The policy includes broad criteria relating to community facilities, SANG, green infrastructure, open space, rights of way, biodiversity networks, dementia friendly design, heritage, flooding, and access.</p> <p>Policy SAXGN2 adds a further local dimension to the policy framework and is chiefly concerned with green infrastructure and open spaces and environmental issues. It identifies some specific areas where ‘green links’ should be provided e.g. the creation of a ‘green zone’ in the north of the site and significant landscaping along the western boundary.</p> <p>The policy makes reference to the collaborative masterplan referred to in the Local Plan to be produced with landowner collaboration and community engagement.</p>
<p>SAXGN3: Community Facilities</p>	<p>This policy is consistent with paragraph 8b of the NPPF which outlines the social objective of the NPPF and specifically highlights the need for ‘accessible services and open spaces that reflect</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP12.29 South Saxmundham Garden Neighbourhood which allocates the Garden Neighbourhood and sets out how it should be developed. The policy includes broad criteria relating to community</p>

<p>NEW POLICY</p>	<p>current and future needs and supports communities' health, social and cultural well-being'. This policy is consistent with NPPF para 98 which states 'To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;'</p> <p>Policy SAXGN3 provides specific guidance on community facilities to be provided within the Garden Neighbourhood including design and locational criteria.</p>	<p>facilities, SANG, green infrastructure, open space, rights of way, biodiversity networks, dementia friendly design, heritage, flooding, and access.</p> <p>Policy SAXGN3 provides a further local dimension to the policy framework and is primarily concerned with community facilities (which have been identified in the Local Plan policy) . The policy provides more detail on where such facilities may be best located within the Garden Neighbourhood.</p>
<p>SAXGN4: Design of the Garden Neighbourhood</p> <p>NEW POLICY</p>	<p>Policy SAXGN4 provides more detailed design guidance on the design of the Garden Neighbourhood. This policy reflects NPPF para 131 which sets out the design criteria that development should meet for example 'visually attractive as a result of good architecture, layout and appropriate and effective landscaping', 'sympathetic to local character and history, including the surrounding built environment and landscape setting while not preventing or discouraging appropriate innovation or change'...'create places that are safe, inclusive...with a high standard of amenity...and where crime and the fear of crime do not undermine the quality of life or community cohesion or resilience'.</p> <p>The policy requires that the Garden Neighbourhood development will be expected to be imaginative and innovative and make a positive contribution to the character of the town. The policy is supported by the Saxmundham Design Guidelines and Codes for the Neighbourhood Plan Area.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP12.29 South Saxmundham Garden Neighbourhood which allocates the Garden Neighbourhood and sets out how it should be developed. The policy includes broad criteria relating to community facilities, SANG, green infrastructure, open space, rights of way, biodiversity networks, dementia friendly design, heritage, flooding, and access.</p> <p>Policy SAXGN4 provides a further local dimension to the policy framework and more detailed design guidance which will shape the design, layout, parking arrangements, landscaping, built form, energy and environmental design, gateways and storage arrangements in the proposed Garden Neighbourhood. The policy covers both residential and employment area of the Garden Neighbourhood.</p>

<p>SAXEN1 Addressing and mitigating the impacts of large scale energy Projects</p> <p>NEW POLICY</p>	<p>Paragraph 5 of the NPPF makes it clear that it does not contain policies for nationally significant infrastructure projects. However, the policy is consistent with paragraph 8 (a-c) of the NPPF which sets out the objectives which contribute towards sustainable development.</p> <p>The aim of Policy SAXEN1 is to ensure that where National Significant Infrastructure Projects or Major Energy Projects are to be located within Saxmundham parish that the necessary environment mitigations required to ensure that development is sustainable are identified and delivered.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP3.4 Proposals for Major Energy Infrastructure, which sets out the approach to be taken by East Suffolk to applications for such projects either in its role as determining authority or as a consultee.</p> <p>Poicy SAXEN1 seeks to ensure that the impacts of such developments are given significant weight in the determination of applications and furthermore that where mitigatory or compensatory measures are identified and required to mitigate these impacts that they are provided where those impacts re most felt.</p>
<p>SAXTC1: Town Centre overarching strategy</p> <p>This policy is unchanged</p>	<p>This policy is consistent with paragraph 90 of the NPPF which advocates a positive approach to the growth , management and adaptation of town centres including promoting their long-term vitality and viability.</p> <p>Policy SAXTC1 sets out the long-term overarching strategy for the town centre reinforcing the area’s distinctiveness and attractive character, underpinning its vitality and viability, and ensuring that users have a high sense of safety and belonging.</p>	<p>This policy is in general conformity with Adopted Policy SCLP12.28 which seeks to enhance Saxmundham’ s role as a market town and employment and service centre. Criterion a) of the policy seeks to enhance the vitality and vibrancy of the town centre through protecting and enhancing the historic core of the town.</p> <p>Policy SAXTC1 builds on this and sets out the long-term overarching strategy for the town centre, identifying specific areas and buildings and reinforcing the area’s distinctiveness and attractive character, underpinning its vitality and viability, and ensuring that users have a high sense of safety and belonging.</p>
<p>SAXSA1: Station Area Opportunity Zone</p> <p>This policy is unchanged</p>	<p>This policy is consistent with NPPF paragraph 90 a) which encourages the growth and diversification of town centres in a way that responds to changes in retail and leisure and plans positively for a suitable mix of uses.</p> <p>Policy SAXSA1 identifies an ‘Opportunity Zone’ around Station Approach that would be suitable for redevelopment for mixed uses, modal shift, environmental and public realm improvements and enhanced pedestrian and cycle connectivity. This is not a site</p>	<p>This policy is in general conformity with Adopted Policy SCLP12.28 – Strategy for Saxmundham, which recognises the opportunities offered by the rail connection. In addition criterion d) of the policy seeks to enhance pedestrian and cycle activity around the town centre and the railway station.</p> <p>Policy SAXSA1 adds further detail to this policy and identifies an ‘Opportunity Zone’ around Station Approach that would be suitable for redevelopment for mixed uses, modal shift,</p>

	allocation but an area identified where the potential for future development could be explored further.	environmental and public realm improvements and enhanced pedestrian and cycle connectivity.
SAXSFR1: Street Farm Road Opportunity Zone This policy is unchanged	<p>This policy is consistent with NPPF paragraph 90 a) which encourages the growth and diversification of town centres in a way that responds to changes in retail and leisure and plans positively for a suitable mix of uses.</p> <p>Policy SAXSFR1 identifies two broad ‘Opportunity Zones’ at Street Farm Road that would be suitable for mixed use development, environmental enhancement and community uses. This is not a site allocation but an area identified where the potential for future development could be explored further.</p>	<p>This policy is in general conformity with Adopted Policy SCLP12.28 which seeks to enhance Saxmundham’s role as a market town and employment and service centre. Criterion c) of the policy seeks to diversify and expand employment opportunities and criterion e) seeks to promote enhancements to networks of green infrastructure.</p> <p>Policy SAXSFR1 provides further detail and identifies two broad ‘Opportunity Zones’ at Street Farm Road. The first would be suitable for mixed use development including car parking and the second for environmental enhancement and community uses.</p>
SAXFS1: Fromus Square Opportunity Zone This policy is unchanged	<p>This policy is consistent with NPPF paragraph 90 a) which encourages the growth and diversification of town centres in a way that responds to changes in retail and leisure and plans positively for a suitable mix of uses. Furthermore, paragraph 90 c) of the NPPF advocates the retention and enhancement of markets and the reintroduction or creation of new ones.</p> <p>Policy SAXFS1 identifies an ‘Opportunity Zone’ at Fromus Square where proposals which would enhance the retail, hospitality, and leisure use of the area, whilst preserving its character and facilitate its use for market purposes and enhance its overall visual quality will be supported. This is not a site allocation but an area identified where the potential for future development could be explored further.</p>	<p>This policy is in general conformity with Adopted Policy SCLP12.28 which seeks to enhance Saxmundham’s role as a market town and employment and service centre. Criterion a) of the policy seeks to enhance the vitality and vibrancy of the town centre through protecting and enhancing the historic core of the town.</p> <p>Policy SAXFS1 adds more detail and identifies an ‘Opportunity Zone’ at Fromus Square where proposals which would enhance the retail, hospitality, and leisure use of the area, whilst preserving its character and facilitate its use for market purposes and enhance its overall visual quality will be supported.</p>
SAXFC1: Former Fromus Centre and community garden	This policy reflects NPPF para 63 which advises that planning policies should reflect the needs of those who require specialist forms of housing to meet specific needs.	This policy is in general conformity with Adopted Policy SCLP12.28 which seeks to enhance Saxmundham’s role as a market town and employment and service centre. Criterion f) of the policy seeks to increase the provision of housing and affordable housing to provide greater choice in the mix of housing available.

<p>Opportunity Zone</p> <p>This policy is unchanged</p>	<p>Policy SAXFC1 identifies an ‘Opportunity Zone’ at the former Fromus Centre within which the provision of housing for those with specific needs would be supported together with the retention of the community garden as an open space. This is not a site allocation but an area identified where the potential for future development could be explored further.</p>	<p>Policy SAXFC1 provides more localised detail and identifies an ‘Opportunity Zone’ at the former Fromus Centre within which the provision of housing for those with specific needs would be supported together with the retention of the community garden as an open space.</p>
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6. Compliance with Basic Condition d): Achieving Sustainable Development

- 6.1 The NPPF 2024 states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.¹ The appraisal of the Modified Saxmundham Neighbourhood Development Plan policies against NPPF policies presented above demonstrates how polices in the Neighbourhood Plan comply with the NPPF and therefore deliver sustainable development.
- 6.2. The NPPF states that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives.

Economic, social, and environmental objectives

- 6.3 These objectives give rise to the need for the planning system to perform a number of roles as defined by the NPPF and set out below.
- 6.4 The objectives and policies contained within the Modified Saxmundham Neighbourhood Plan contribute towards each of these three objectives and cumulatively contribute to the achievement of sustainable development. How they achieve this is summarised below, Unsurprisingly, there is a degree of cross-over between policies and many contribute to more than one of the sustainable development objectives e.g. **SAX1: General Design Principles** which contributes to both social and environmental objectives.
- 6.5 The plan has been formulated with Sustainable Development at its heart and looks forward with an eye on the legacy created for future generations. The vision itself is essentially split into three parts which mirror the economic, social, and environmental dimensions of sustainable development.

¹ Resolution 42/187 of the United Nations General Assembly.

A thriving and prosperous town

- which acts as a key service centre and transport hub for the town and surrounding area
- with the physical and community infrastructure to support growth
- with new and varied employment opportunities, including in new and growing sectors, which take advantage of the connections offered by rail and the A12
- with a vibrant and viable town centre and a bustling weekly market, with strong retail, cultural, energy and hospitality sectors
- and adequate and convenient parking provision.

A safe and healthy town

- with good social, cultural and leisure provision contributing to the health and wellbeing of all ages
- with well used green open spaces and an enhanced network of green infrastructure providing access to nature and improvements to biodiversity
- with ease of movement throughout the town
- with safe routes for pedestrians and cyclists
- with good quality housing which meets the current and future needs of residents
- enjoying enhanced medical and educational facilities, which support healthy lifestyles
- where services and employment choices are local.

An attractive and distinctive town

- which is friendly and inclusive
- where new and existing development is successfully integrated forming a holistic and sustainable community
- which has a strong, wide-ranging cultural identity with well-equipped public venues and programmes of events and activities
- with a well maintained and valued historic town centre, enjoyed by visitors and residents alike.

6.6 The plan contains a set of five area wide objectives which cover the entire Neighbourhood Area. A further two new objectives have been specifically developed to cover the Garden Neighbourhood and one additional new objective relates to National Infrastructure and Energy Projects. The five objectives that cover the identified 'Opportunity Zones' are unchanged. The objectives are identified in order to deliver the vision. These have been refined over time through public consultation. site allocations, but areas identified where the potential for future development could be explored further.

Area Wide Objectives:

Local economy

Objective 1: To promote a strong and diverse, forward looking, local economy, building upon the town's advantages as a service centre market town with a strategic location.

Community infrastructure

Objective 2: To secure for the community of Saxmundham a full range of physical and community infrastructure to meet the growing needs of the town and its environs.

Transport and movement

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.

Housing

Objective 4 : To promote the development of high quality, energy efficient housing to meet the needs of the people of Saxmundham.

Heritage and natural environment

Objective 5: To protect and enhance the conservation area, the town's heritage, green spaces, natural features, and rural setting, and to address the challenges of climate change.

Opportunity Zone Objectives:

South Saxmundham Garden Neighbourhood

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

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

National Infrastructure and Energy Projects

Objective SAXEN1: To ensure that the necessary measures required to mitigate the physical, visual and social impacts of National Infrastructure and Energy Projects on Saxmundham are identified and implemented.

Saxmundham Town Centre

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.

Objective STC4: To encourage the economic and environmental regeneration of the station area via a masterplan led approach, which encourages mixed-use redevelopment of underused and derelict land, and improves the attractiveness of Station Approach as a route for pedestrians and cyclists

Former Fromus Centre and Community Garden

Objective FFC1: To support a high-quality redevelopment for specialist and other housing purposes including community use, which safeguards the community garden, and offers improved pedestrian access to and permeability within, the site.

- 6.7 The objectives each support development whilst recognising the important of safeguarding and enhancing the special qualities that contribute to the specific character of Saxmundham.
- 6.8 The following table helps to further demonstrate the Plan’s comprehensive contribution to sustainable development.

NPPF Sustainable Development	Contribution through Saxmundham Neighbourhood Plan Policies
<p>NPPF 2024 An economic objective: to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places, and at the right time to support growth, innovation, and improved productivity; and by identifying and co-ordinating the provision of infrastructure.</p>	<p>Objective 1: To promote a strong and diverse, forward looking, local economy, building upon the town’s advantages as a service centre market town with a strategic location</p> <p>Objective EN1: To ensure that the necessary measures required to mitigate the physical, visual and social impacts of National Infrastructure and Energy Projects on Saxmundham are identified and implemented.</p> <p>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.</p> <p>Objective STC4: To encourage the economic and environmental regeneration of the station area via a masterplan led approach, which encourages mixed-use redevelopment of underused and derelict land, and improves the attractiveness of Station Approach as a route for pedestrians and cyclists</p> <p>SAX2: Expansion of existing businesses encourages the small-scale expansion of existing businesses subject to criteria.</p> <p>SAX3: New businesses indicates a variety of employment sectors that will be supported within the town.</p> <p>SAXGN1: Connecting the Garden Neighbourhood identifies important connections required between the residential and employment areas of the Garden Neighbourhood development</p> <p>SAXGN4: Design of the Garden Neighbourhood provides design guidance for the employment area of the Garden Neighbourhood</p>

	<p>SAXTC1: Town centre overarching strategy sets out the long-term overarching strategy for the town centre. It identifies specific areas and buildings that contribute to its character and reinforce the area’s distinctiveness. The policy seeks to underpin the town’s vitality and viability and ensure that users have a high sense of safety and belonging.</p> <p>SAXSA1: Station area Opportunity Zone identifies an ‘Opportunity Zone’ around Station Approach and encourages suitable redevelopment for mixed uses whilst encouraging modal shift . It identifies environmental and public realm improvements and enhanced pedestrian and cycle connectivity.</p> <p>SAXSFR1: Street Farm Road Opportunity Zone. identifies two broad ‘Opportunity Zones’ at Street Farm Road that would be suitable for mixed use development, environmental enhancement and community uses.</p> <p>SAXFS1: Fromus Square Opportunity Zone identifies an ‘Opportunity Zone’ at Fromus Square where proposals which would enhance the retail, hospitality, and leisure use of the area, whilst preserving its character and facilitate its use for market purposes and enhance its overall visual quality will be supported.</p>
<p>NPPF 2024 A social objective: to support strong, vibrant, and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and</p>	<p>Objective 2: To secure for the community of Saxmundham a full range of physical and community infrastructure to meet the growing needs of the town and its environs.</p> <p>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.</p> <p>Objective 4 : To promote the development of high quality, energy efficient housing to meet the needs of the people of Saxmundham.</p> <p>Objective SSGN1: To create a high quality, well designed, distinctive new development in line with modern ‘Garden City’ principles which is valued by its residents and recognised as an asset to the Town.</p> <p>Objective SSGN2: To successfully integrate - physically, environmentally, and socially - the new neighbourhood with the existing town and community of Saxmundham.</p> <p>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.</p>

	<p>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.</p> <p>Objective STC4: To encourage the economic and environmental regeneration of the station area via a masterplan led approach, which encourages mixed-use redevelopment of underused and derelict land, and improves the attractiveness of Station Approach as a route for pedestrians and cyclists</p> <p>Objective FFC1: To support a high-quality redevelopment for specialist and other housing purposes including community use, which safeguards the community garden, and offers improved pedestrian access to and permeability within, the site.</p> <p>SAX4: Protecting valued local community facilities and amenities protects existing community facilities from loss either through change of use or redevelopment.</p> <p>SAX5: New community facilities sets out the priorities for new community facilities as identified by the community through consultation.</p> <p>SAX6: Improving connectivity seeks to improve connectivity and accessibility for pedestrians, cyclists, and users with a mobility impairment.</p> <p>SAX7: Footpaths and rights of way seeks to ensure that public rights of way are protected and enhanced.</p> <p>SAX8: Parking provision sets out the criteria for the provision of acceptable residential and non- residential parking.</p> <p>SAX9: Windfall and Infill development sets out the criteria for acceptable infill or windfall development.</p> <p>SAX10: Housing mix sets out the preferred mix for new housing development as identified by the community through consultation.</p> <p>SAX15: Community gardens and allotments supports the provision of new community gardens and allotments in new developments.</p> <p>SAX16: Green Spaces identifies a number of Local Green Space for protection together with an area of Suitable Alternative Natural Greenspace (SANG)</p> <p>SAXGN1: Connecting the Garden Neighbourhood identifies the specific pedestrian and cycling connections</p>
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	<p>that are required to make the Garden Neighbourhood sustainable and fully accessible to non -vehicular modes.</p> <p>SAXGN2: Green infrastructure links identifies the green infrastructure, open spaces, green links, and landscaping that is required to environmentally enhance the Garden Neighbourhood.</p> <p>SAXGN3: Community facilities identifies the community facilities that are required to support the development of the Garden Neighbourhood community.</p> <p>SAXGN4: Design of the Garden Neighbourhood provides detailed design guidance in the development of the Garden Neighbourhood to the benefit of the community.</p> <p>SAXEN1: Addressing and mitigating the impacts of large scale energy projects seeks to ensure that the mitigations required to safeguard the community and the environment from the potential impacts of such developments are identified and implemented.</p> <p>SAXTC1: Town centre overarching strategy sets out the strategy required to support the vitality and viability for the town centre in the longer term.</p> <p>SAXSA1: Station area Opportunity Zone identifies an opportunity zone around the Station Area where mixed uses, environmental enhancements and improved pedestrian and cycle connectivity is encouraged.</p> <p>SAXSFR1: Street Farm Road Opportunity Zone. identifies two opportunity zones at Street Farm Road where mixed uses including car parking, environmental enhancements and community uses will be supported.</p> <p>SAXFS1: Fromus Square Opportunity Zone identifies an opportunity zone for Fromus Square where a mix of retail and leisure use will be encouraged together with environmental enhancements and the provision of a market.</p> <p>SAXFC1: Former Fromus Centre site and Community Garden identifies the former Fromus Centre and Community garden as an opportunity zone for the provision of specialist housing for people with specific needs together with the retention of the community garden for community use.</p>
<p>NPPF 2024 An environmental objective: to protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using</p>	<p>Objective 5: To protect and enhance the conservation area, the town’s heritage, green spaces, natural features, and rural setting, and to address the challenges of climate change.</p> <p>Objective SSGN1: To create a high quality, well designed, distinctive new development in line with modern</p>

natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

'Garden City' principles which is valued by its residents and recognised as an asset to the Town.

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

Objective SAXEN1: To ensure that the necessary measures required to mitigate the physical, visual and social impacts of National Infrastructure and Energy Projects on Saxmundham are identified and implemented.

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

SAX11: Historic town centre and Conservation Area seeks to protect the historic environment of the town including its listed buildings and the Conservation Area.

SAX12: Non-designated Heritage Assets identifies a number of potential Non-Designated Heritage Assets within the town for special protection.

SAX13: Gateways, views, and landscape setting of Saxmundham seeks to protect the landscape character and rural setting of the town. The policy identifies a number of locally important views together with important gateways to the town.

SAX14: Protection and enhancement of natural assets protects existing natural assets of the parish and requires new development to provide a net gain for biodiversity.

SAX15: Community gardens and allotments requires the provision of new community gardens and allotments in new developments.

SAX16: Green Spaces identifies a number of proposed Local Green Spaces for protection.

SAXGN2: Green infrastructure links identifies the green infrastructure, open spaces, green links, and landscaping that is required to environmentally enhance the Garden Neighbourhood.

SAXGN4 Design of the Garden Neighbourhood provides detailed design guidance for the Garden Neighbourhood on issues such as landscaping, design, materials, layout, lighting, environmental measures.

SAXEN1: Addressing and mitigating the impacts of large scale energy projects seeks to ensure that the mitigations required to safeguard the environment from the potential impacts of such developments are identified and implemented.

	<p>SAXSFR1: Street Farm Zone Opportunity Zone identifies two broad 'Opportunity Zones' at Street Farm Road one of which would be suitable for environmental enhancement and community uses</p>
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7. Compatibility with Basic Condition f): Compatibility with EU Obligations

- 7.1 The statement below demonstrates how the Modified Saxmundham Neighbourhood Development Plan does not breach and is compatible with relevant EU obligations. The United Kingdom formally left the European Union on the 31st January 2020, which was followed by an 11-month transition period that expired on 31st December 2020. Basic Condition (f) of the Neighbourhood Plan Regulations 2012 requires that the making of a Neighbourhood Plan should not breach nor be incompatible with European Obligations. These include those relating to environmental matters such as Habitats and Species.
- 7.2 Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) Screening was undertaken by East Suffolk Council at Pre-Submission stage. The Screenings were carried out by East Suffolk Council between August and October 2025, following a formal request from the Qualifying body in June 2025.

Strategic Environmental Assessment (SEA)

- 7.3 East Suffolk District Council began the SEA Screening Process in August 2025. The Strategic Environmental Assessment Screening Opinion produced by the Council in August 2025 determined there would be no likely significant environmental effects. Following consultation with the statutory bodies (Environment Agency, Historic England, and Natural England in August and September 2025), East Suffolk Council issued its screening opinion in October 2025, which concluded that:
“The draft Modified Saxmundham Neighbourhood Plan does not allocate land for built development and applies to a localised area. The plan has been prepared within the context of the strategic policies of the Suffolk Coastal Local Plan (September 2020) which has been subject to Sustainability Appraisal including Strategic Environmental Assessment and Appropriate Assessment under the Habitats Regulations Assessment. It is considered by East Suffolk Council that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Saxmundham Neighbourhood Plan to ensure compliance with EU obligations”
- 7.4 The draft of the screening assessment was shared with the statutory consultation bodies and their views were taken into account by East Suffolk prior to finalising the report. Copies of their responses are set out in the final Screening Opinion at Appendix 1. Historic England and Natural England agreed with the conclusions of the draft screening report. The Environment Agency response raised concerns regarding the age of the Local Plan, so in light of this East Suffolk officers, revisited their conclusion but, given that the Modified Neighbourhood Plan does allocate any new sites for development, Officers still considered that baseline and SEA produced to support the Suffolk Coastal Local Plan remains applicable to the Saxmundham Neighbourhood Plan and therefore the Council retained the conclusion that further Strategic Environmental Assessment work was not required. East Suffolk officers further liaised with the Environment Agency on this matter, who confirmed that they do not object to that conclusion.
- 7.5 East Suffolk Council have therefore concluded that an SEA would not be required, and the Saxmundham Neighbourhood Development Plan can be ‘screened out’ for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.

Human Rights

- 7.5 In addition, the Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. The Consultation Statement which accompanies the submitted Modified Saxmundham Neighbourhood Plan sets out the process followed in terms of community involvement and records that landowners and developers with interests in the Garden Neighbourhood were consulted and responded to those consultations.

Conclusion

- 7.6 The Saxmundham Neighbourhood Plan therefore is compatible with EU Obligations and satisfies this basic condition.

8. Compatibility with Basic Conditions g) Prescribed matters

- 8.1 An additional basic condition is prescribed under Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 as follows:

'The making of the Neighbourhood Development Plan is not likely to have any significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2010 (2)) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c) Regulations 2007 (3)), (either alone or in combination with other plans and projects).'

- 8.2 The purpose of the Habitat Regulations Assessment (HRA) is therefore to ensure the protection of European (Natura 2000) sites. These sites are designed to form an ecologically coherent network of designated sites across the whole of Europe. Referred to as 'European Designated Sites,' Natura 2000 sites include Special Protection Areas (SPAs) and Special Areas for Conservation (SAC).
- 8.3 Although the parish of Saxmundham itself does not contain any European Protected Nature Conservation Sites it is in relatively close proximity to the extremely sensitive Sandlings, Alde-Ore and Minsmere-Walberswick Special Protection Areas and also within the 13km Zone of Influence for the Council's Recreational Disturbance Avoidance and Mitigation Scheme (RAMS).

Habitats Regulation Assessment (HRA)

- 8.4 The process for testing the plan against the relevant regulation is through Habitats Regulation Assessment (HRA). The HRA screening took place during the same timescale as the SEA Screening (August to October 2025) and was undertaken by East Suffolk Council. The HRA Report takes into account the latest regulations, guidance and court judgements relating to this area including CJEU People Over Wind v Coillte Teoranta C-323/17 which rules that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats site. The HRA Screening Report therefore does not consider mitigation measures within the assessment of Likely Significant Effects resulting from the Modified Saxmundham Neighbourhood Development Plan. The

Screening report also considers the impact of the judgement CJEU Holohan C- 461/17, which imposes more detailed requirements in the competent authority at Appropriate Assessment Stage.

- 8.5 The HRA Screening Opinion produced by East Suffolk Council in October 2025 , concluded that:
- “The 2023 Neighbourhood Plan was subject the HRA screening at the time which concluded that full AA was not required. The modified Saxmundham Neighbourhood plan builds on the made neighbourhood plan. The modified Plan does not allocate any sites for development and includes adequate reference to the requirements of the Suffolk Coast RAMS and additional green infrastructure requirements. It is therefore concluded that the modified Saxmundham Neighbourhood Plan will not lead to any adverse effects on protected Habitat Sites. Natural England were consulted on a draft of this screening report and agreed with this conclusion, their response is appended to this report. The Saxmundham Neighbourhood plan includes adequate reference to the requirements of the Suffolk Coast RAMS and additional green infrastructure requirements and therefore it is concluded that the Saxmundham Neighbourhood Plan will not lead to any adverse effects on protected Habitat Sites.”*

Conclusion

- 8.6 The Modified Saxmundham Neighbourhood Plan has been prepared to be in general conformity with the relevant policies in the Local Plan and will not lead to likely significant effects on protected European sites. The Modified Saxmundham Neighbourhood Plan therefore is compatible with the requirements of Neighbourhood Planning (General) Regulations 2012 and satisfies this basic condition.

Saxmundham

Consultation Statement

To accompany Modified Saxmundham Neighbourhood Plan
submission version, for examination
December 2025

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1. Introduction

1.1 Background and consultation requirements

1.1.1 The Modified Saxmundham Neighbourhood Plan is a community-led document for guiding the future development of the parish. It is a modified version of the Plan for 2022-2036, and a part of the government's current approach to planning. It draws on consultation and other evidence bases.

1.1.2 The Consultation Statement is designed to meet the requirements set out in the Neighbourhood Planning (General) Regulations 2012 for Consultation Statements. This document sets out the consultation process employed in the production of the Modified Saxmundham Neighbourhood Plan. It also demonstrates how the requirements of Regulations 14 and 15 of the Neighbourhood Planning (General) Regulations 2012 have been satisfied.

1.1.3 The Saxmundham Neighbourhood Plan Steering Group has endeavoured to ensure that the Plan reflects the desires of the local community and key stakeholders, who have been engaged in the process.

1.1.4 Part 5, Section 15(2) of the Regulations sets out that a Consultation Statement should:

- a. contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan [or neighbourhood development plan as proposed to be modified.];
- b. explains how they were consulted;
- c. summarises the main issues and concerns raised by the persons consulted; and
- d. describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan [or neighbourhood development plan as proposed to be modified.]

2. Community engagement stages

2.1 The designation of the new Neighbourhood Area

- 2.1.1 After a Community Governance Review in April 2023, the Saxmundham parish boundary was Modified to include land that was previously in the parish of Benhall and Sternfield. Saxmundham Town Council began a review of its 'made' Neighbourhood Plan shortly afterwards. In December 2023, Saxmundham Town Council applied to East Suffolk Council to amend the Neighbourhood Area so that it was consistent with the new parish boundary. The request was approved by East Suffolk Council on 30th April 2024. See Appendix 1 for map of the designated area for the Modified Neighbourhood Plan.
- 2.1.2 Appendix 2 lists the Steering Group members. In July 2024 Saxmundham Neighbourhood Plan Steering Group appointed project support from Compass Point Planning and Rachel Leggett & associates.

2.2 Community engagement

- 2.2.1 There are two stages of evidence based work that were undertaken for the Modified Neighbourhood Plan. Full details of the pre-submission consultation work can be found in Appendix 3. The names of individual respondents have been removed.

- **Stage 1: updated evidence**
 - **Steering Group meeting** (30th September 2024): Scoping session for modified Neighbourhood Plan.
 - **Data profile for Saxmundham** (September 2024): document containing key data for the parish, to inform policy writing.
- **Stage 2: Pre-submission consultation on the draft Modified Saxmundham Neighbourhood Plan** (Appendix 3)
 - Pre-submission consultation on the Modified Neighbourhood Plan, ran from 27th June to 15th August 2025. An exhibition of the Modified draft Neighbourhood Plan took place on Friday 27th June (4pm-8pm) and Saturday 28th June 2025 (10am-2pm) at the Market Hall.
 - A physical copy of the Modified Plan was available in the Saxmundham Library and the Town Council offices.
 - A link to the Modified Neighbourhood Plan and supporting documents was also sent to the following organisations for formal comment:
STATUTORY
 - East Suffolk Council
 - Natural England
 - Environment Agency
 - Historic England

- Suffolk County Council
- Suffolk Preservation Society
- Anglian Water
- Essex and Suffolk Water
- Mobile UK
- Suffolk and North East Essex Integrated Care Board
- UK Power Networks
- National Grid
- National Gas

ADJOINING PARISHES

- Benhall and Sternfield Parish Council
- Rendham Parish Council
- Kelsale-cum-Carlton Parish Council
- Theberton and Eastbridge Parish Council
- Knodishall Parish Council
- Saxmundham Town Council

MP, DISTRICT AND COUNTY COUNCILLORS

- Jenny Riddell-Carpenter MP
- Cllr John Fisher
- Cllr Richard Smith

OTHER CONSULTEES

- Suffolk Wildlife Trust
- Homes and Communities Agency
- Network Rail
- National Highways
- Suffolk Police Designing Out Crime Officer
- Sport England

DEVELOPERS

- Pigeon Investment Management Ltd
- AR Planning
- Sizewell C Company
- National Grid Electricity Transmission (Sea Link)
- National Grid Ventures (Lion Link)

2.2.2 The Modified Neighbourhood Plan also draws, in part, on the evidence base from the July 2023 Made Neighbourhood Plan. This are as follows.

Stage 1: Initial work and key issues consultation (Autumn/Winter 2017 to April 2018).

- **Initial meeting** (4th September 2017): 30 local community representatives in the Market Hall to discuss the 20-year future of Saxmundham and what should go in Neighbourhood Plan.
- **Open meeting** (4th November 2017): Held at Saxmundham Free School, the Neighbourhood Plan process and purpose was explained, and attendees were then asked to work in small groups to answer the following questions: (a) What are the main issues and challenges facing Saxmundham, present and future? (b) What needs to be done to create the necessary changes?

The session was written up and key issues were identified. The results of the meeting were published in April 2018.

Stage 2: Further consultation on themes (June, July and September 2018, and January 2019).

- **A series of themed public meetings** (June, July and September 2018): Held at the Market Hall, meetings built upon the key issues already identified and sought feedback from the public – Housing (27th June 2018), general drop-in information morning (14th July 2018), Town Centre and Local Economy (19th September 2018). The results of each meeting were written up and posted on the Neighbourhood Plan website.
- **Student engagement:** A visit to the Free School by Steering Group Members to receive a presentation from the students on the results of their survey filled in by 135 students. 'The Future of Saxmundham - A Students' Eye View'.

Stage 3: Household survey (June 2019).

- **Household survey** (June 2019): devised by the Neighbourhood Plan Steering Group members. Approximately 2200 surveys were hand delivered to every household in the town, each with a pre-paid envelope. The form allowed for up to 4 members of the household to respond. 550 forms were completed by close to 1000 residents. This represented a return rate of approximately 25 per cent. The survey contained a series of questions covering issues such as the location and type of new housing, new community facilities, environmental issues for new housing, town centre and high street, the market, the station area, transport and mobility. The survey also recorded where in the town those that responded to the survey lived, their gender, their employment status and general information about their household. *Note: due to the Covid-19 pandemic the results of the survey were not reported back to the community until July 2020, when they were published on the website in full and also a useful summary of the key findings.*

Stage 4: Consultation on the draft Neighbourhood Plan (Autumn 2021).

- **Pre-submission draft Neighbourhood Plan:** issued for consultation (5th November to 22nd December 2021). Sent to statutory agencies and available for residents to comment.
- **Consultation launched** with an exhibition on 5th November (6pm-9pm) and 6th November 2021 (10am-4pm) at the Market Hall.
- All documents were available on the Neighbourhood Plan website and in the Saxmundham Library and the Town Council offices.

2.3.1 To communicate the emerging Modified Neighbourhood Plan, the Steering Group used:

- The Neighbourhood Plan page on the Saxmundham Town Council website. The Community Consultations section of the Saxmundham Town Council website (with detailed information on how to respond, with response form to be downloaded, and information on where to read paper copies).
- Posters and flyer displayed around the parish.
- Facebook
 - Posts on Saxmundham Town Council Facebook page, including press release, and information on in-person consultation sessions
 - Posts on 'Saxmundham - What's Happening?' page (at least 7 posts, between 24th June 2025 and 15th August 2025) – this page has over 10,000 members.
 - Posts on Saxmundham Neighbourhood Plan Facebook page (which has over 350 members) – around 15 more detailed factual and explanatory posts by Chair of Neighbourhood Plan Steering Group on all aspects of proposed modification policies, on consultation process and timescales etc. – between 24th June and 11th August 2025.
- Updates at Town Council meetings which are open to the public.
- Saxmundham News – brief information on the consultation published in this monthly journal delivered to most Saxmundham households, inviting residents to 'share your views'.
- Press release from Saxmundham Town Council giving full information – forming basis of article by East Anglian Daily Times on 3rd July 2025 (online at <https://www.eadt.co.uk/news/25279976.saxmundham-plan-includes-garden-neighbourhood-energy/>)
- Leaflets and posters, in particular for the in-person consultation/exhibition.

2.3.2 Should a referendum be required, the Steering Group intend to write a short summary of the Neighbourhood Plan for the community.

3. Conclusion

- 3.1 The programme of community engagement carried out during the production of Modified Saxmundham Neighbourhood Plan was appropriate to the process of reviewing the Neighbourhood Plan.
- 3.2 The comments received throughout and specifically in response to the consultation on 'Pre-submission draft of Modified Saxmundham Neighbourhood Plan' have been addressed, in so far as they are practical, and in conformity with the National Planning Policy Framework (2024), and the East Suffolk Council – Suffolk Coastal Local Plan (September 2020).

APPENDIX 2: Neighbourhood Plan Steering Group members

The Saxmundham Neighbourhood Plan Steering Group consisted of the following members:

- Geraldine Barker, Town Councillor
- Christine Buttery (vice-chair), Local resident
- Diana Eastman, local resident
- John Findlay (vice-chair), Town Councillor
- Nick Jackson, Town Councillor (*until September 2025*)
- Stephen Palmer, Local resident
- Justin Power, Local resident
- Jeremy Smith (chair), Town Councillor
- John White, Local resident

Observer

- John Fisher, District and Town Councillor

Supported by

- Sharon Smith, Town Clerk

Independent Consultants

- Andrea Long, Compasspoint Planning
 - Rachel Leggett, Rachel Leggett & Associates
 - Emma Harrison, Rachel Leggett & Associates
-

APPENDIX 3: Pre-submission consultation on the draft Modified Neighbourhood Plan

Appendix 3(a): Posters/flyers for pre-submission consultation.

Comment on the modified Saxmundham Neighbourhood Plan

The Saxmundham Neighbourhood Plan is a community-led document for guiding the future development of the parish. In 2023 Saxmundham's parish boundary was extended so that all the land allocated by East Suffolk Council for the South Saxmundham Garden Neighbourhood is now within Saxmundham's boundary. As a result the modified Neighbourhood Plan includes new policies which we are consulting on, together with a policy aiming to tackle the negative impacts of new national Energy projects on Saxmundham, if these get government approval. Make your comments on the draft Plan.

Drop-in to the Market Hall
Friday 27 June, 4pm-8pm, or
Saturday 28 June, 10am-2pm

Or read a copy at the Library, the Town Council offices, or comment online at www.saxmundham.org

Consultation closes on 15th August 2025

SAXMUNDHAM TOWN COUNCIL

Appendix 3(b): Consultation response form (also online).

Draft modified SAXMUNDHAM Neighbourhood Plan

CONSULTATION RESPONSE FORM

Consultation period: 27th June to 15th August 2025.

The Saxmundham Neighbourhood Plan is a community-led document for guiding the future development of the parish. In 2023 Saxmundham's parish boundary was extended so that all the land allocated by East Suffolk Council for the South Saxmundham Garden Neighbourhood is now within Saxmundham's boundary. As a result the modified Neighbourhood Plan includes new policies which we are consulting on, together with policy aiming to tackle the negative impacts of new national Energy projects on Saxmundham, if these get government approval.

Please use this form to comment on the draft Neighbourhood Plan, or comment online www.saxmundham.org, so we can make amendments before submitting it for examination.

PLEASE NOTE: This is a formal stage of consultation before the Neighbourhood Plan is submitted to East Suffolk Council. Comments received will be reported in a Consultation Statement which will be submitted alongside the Plan. The Consultation Statement will be publicly available online.

On submission of the Neighbourhood Plan, Saxmundham Town Council is required to share personal details (name and email address if available) of those that have commented on the document to East Suffolk Council so that they can discharge their legal duties in relation to publicising the submission of the Plan, in accordance with the Neighbourhood Planning (General) Regulations. By submitting a consultation response at this stage, you authorise Saxmundham Town Council to legally collect and share your data in this manner. You can view the Town Council's Privacy Policy on the website.

PLEASE COMMENT ON POLICIES IN THE NEIGHBOURHOOD PLAN. Return this form to: Saxmundham Town Council, The Town House, Station Approach, Saxmundham, IP17 1BW, or complete it online at www.saxmundham.org, or email saxplan1@gmail.com BY 15th August 2025.



Name	
I live or work in Saxmundham	<input type="checkbox"/> Yes <input type="checkbox"/> No (please tick)
Email address (or postal address)	
Organisation name (if appropriate)	

The following policies are NEW in the modified Neighbourhood Plan.

Site specific: South Saxmundham Garden Neighbourhood	
SAXGN1: Connecting the Garden Neighbourhood	<input type="checkbox"/> Agree <input type="checkbox"/> Mostly agree <input type="checkbox"/> Mostly disagree <input type="checkbox"/> Disagree <i>Comments</i>
SAXGN2: Green infrastructure	<input type="checkbox"/> Agree <input type="checkbox"/> Mostly agree <input type="checkbox"/> Mostly disagree <input type="checkbox"/> Disagree <i>Comments</i>
SAXGN3: Community facilities	<input type="checkbox"/> Agree <input type="checkbox"/> Mostly agree <input type="checkbox"/> Mostly disagree <input type="checkbox"/> Disagree <i>Comments</i>
SAXGN4: Design of the Garden Neighbourhood	<input type="checkbox"/> Agree <input type="checkbox"/> Mostly agree <input type="checkbox"/> Mostly disagree <input type="checkbox"/> Disagree <i>Comments</i>

Mitigating the impacts of National Infrastructure and Energy Projects on Saxmundham	
SAXEN1: Addressing and mitigating the impacts of large scale energy projects	<input type="checkbox"/> Agree <input type="checkbox"/> Mostly agree <input type="checkbox"/> Mostly disagree <input type="checkbox"/> Disagree <i>Comments</i>

OPTIONAL: The following Neighbourhood Plan policies have not changed since the Plan was adopted in September 2023 but form part of the reviewed Plan. Please let us know if you have any further comments.

Parish wide: Design principles	
SAX1: General design principles (NO CHANGE)	<i>Comments</i>
Parish wide: Local economy	
SAX2: Expansion of existing businesses (NO CHANGE)	<i>Comments</i>
SAX3: New businesses (note, small amendment in last paragraph)	<i>Comments</i>
Parish wide: Community infrastructure	
SAX4: New community facilities (NO CHANGE)	<i>Comments</i>
Parish wide: Transport and movement	
SAX5: Improving connectivity (some text moved to new policy SAXGN1)	<i>Comments</i>
SAX6: Public Rights of Way (NO CHANGE)	<i>Comments</i>
SAX7: Parking provision (NO CHANGE)	<i>Comments</i>
Parish wide: Housing	
SAX8: Windfall and infill development (NO CHANGE)	<i>Comments</i>
SAX9: Tenure blind Housing Development (NO CHANGE)	<i>Comments</i>
Parish wide: Heritage and the natural environment	
SAX10: Historic town centre and Conservation Area (NO CHANGE)	<i>Comments</i>
SAX11: Non-designated Heritage Assets (NO CHANGE)	<i>Comments</i>

SAX12: Gateways, views and landscape setting of Saxmundham (NO CHANGE)	Comments
SAX13: Protection and enhancement of natural assets (NO CHANGE)	Comments
SAX14: Community gardens and allotments (NO CHANGE)	Comments
SAX15: Green Spaces (note, small amendment in list)	Comments
Opportunity Zones: Saxmundham town centre	
SAXTC1: Town centre overarching strategy (NO CHANGE)	Comments
SAXSA1: Station area Opportunity Zone (NO CHANGE)	Comments
SAXSFR1: Street Farm Road Opportunity Zone (NO CHANGE)	Comments
SAXFS1: Fromus Square Opportunity Zone (NO CHANGE)	Comments
Opportunity Zones: Former Formus Centre and Community Garden	
SAXFC1: Former Formus Centre site and Community Garden Opportunity Zone (NO CHANGE)	Comments

Supporting documents	
Design Guidelines and Codes	Comments
Concept masterplan	Comments

<p>OVERALL, do you</p> <input type="checkbox"/> Agree with the draft modified Neighbourhood Plan?	<p>Do you have any further comments about the draft modified Neighbourhood Plan?</p> <p style="text-align: right;">THANK YOU.</p>
<input type="checkbox"/> Disagree with the draft modified Neighbourhood Plan?	

Appendix 3(c): Log of all comments and responses to pre-submission consultation (Regulation 14).
Saxmundham NEIGHBOURHOOD PLAN

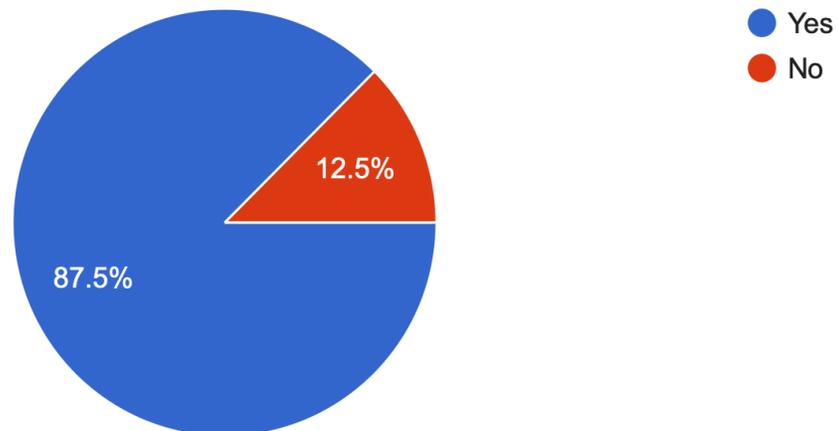
Table code

	Supportive comment or no change to the Plan
	Change to map or supporting text
	Change to policy/text.
	Change made

The pie charts in the document show the results of those who completed the Consultation Response Forms (paper and online combined).

I live or work in Saxmundham

16 responses



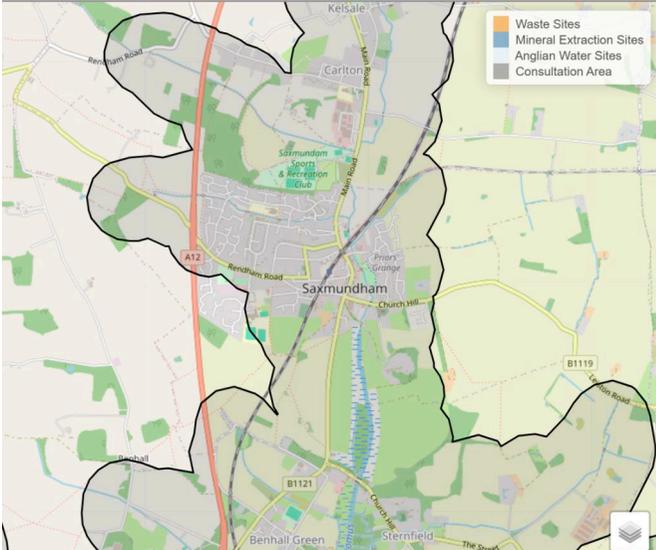
GENERAL COMMENTS

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
1	East Suffolk Council	General comments	East Suffolk Council welcomes the opportunity to comment on the pre submission (Regulation 14) Saxmundham Neighbourhood Plan and notes that there is a lot of valuable content within the draft Plan. East Suffolk Council wishes to make the		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>following comments about the draft modified Plan and we trust that you will find the comments below helpful in progressing the Plan. The Council has a role in providing support for neighbourhood plan groups throughout the plan making process. This includes providing comments in response to consultations and we would very much welcome further discussion on our comments and other aspects of the preparation of the Plan as it progresses.</p> <p>As this is a review of an existing made Neighbourhood Plan, the comments below focus on new text (highlighted in yellow in the modified plan) however, there are also a few other comments relating to unmodified text.</p> <p>General Comments</p> <ul style="list-style-type: none"> • A minor technical point but throughout the document the 2023 Neighbourhood Plan is referred to as the 'adopted' plan the correct term in relation to neighbourhood plans is 'made' rather than 'adopted'. • In relation to the new policies covering the South Saxmundham Garden Neighbourhood (SSGN) we would encourage the Neighbourhood Plan policies to be relevant and proportionate to the point at which the NP would be given weight in the determination process of the SSGN outline 	<p>Noted re reference to Made Plan.</p> <p>ESC officer clarified in meeting on 24/9 that the policies could</p>	<p>Amend accordingly <input checked="" type="checkbox"/></p>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>planning application. It is anticipated that an application will be submitted for the SSGN later in 2025 and therefore consideration should be given to the stage in which appropriate weight can be given to the NP and the effectiveness of its policies considering the stage that the application would be at that point.</p> <ul style="list-style-type: none"> • The Environmental Protection team also wanted to highlight the following points to be considered as part of any future development and could be included in the Neighbourhood Plan: <ul style="list-style-type: none"> ○ Noise levels- the existing land uses and noise sources should be identified and quantified before new development takes place- this is particularly relevant where residential dwellings are being proposed to ensure external and internal noise levels will be acceptable. ○ Contaminated Land- previous land uses should be considered, and areas of potentially contaminated land identified prior to development. Areas where potentially contaminated land is identified will be subject to planning conditions. ○ Air quality- issues concerning air quality should be considered for all 	<p>be more detailed as they may be used for reserved matters applications</p> <p>Agree to include where suitable in SAXGN4 although appreciate this is new issues not previously raised.</p>	

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			developments. This includes large developments that may impact upon air quality (i.e. supermarkets, large infrastructure projects etc), and new residential developments in close proximity to industrial sites/ vehicular sources of air pollution.		
2	Suffolk County Council	Minerals and Waste	<p>Suffolk County Council is the Minerals and Waste Planning Authority for Suffolk. This means that SCC makes planning policies and decisions in relation to minerals and waste. The relevant policy document is the Suffolk Minerals and Waste Local Plan, adopted in July 2020, which forms part of the Local Development Plan.</p> <p>Although there are no safeguarded minerals and waste sites in the Saxmundham Garden Neighbourhood allocation area or within the surrounding areas of the Neighbourhood Plan, most of the parish area is covered by the Minerals Consultation Area (see map below). Any proposed development within this area meeting the criteria would trigger Policy MP10: Safeguarding of the Suffolk Minerals and Waste Local Plan (2020).</p> <p>SCC notes that within the "National and local planning policy context" section of the modified Neighbourhood Plan draft there is no mention of the Suffolk Minerals and Waste Local Plan (2020). It is</p>	<p>Noted.</p> <p>The SMWLP can be added to the diagram.</p>	Amend diagram accordingly <input checked="" type="checkbox"/>

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			<p>required that this plan and its policies are considered alongside all local plans and Neighbourhood Plans. The Minerals and Waste Local Plan should be listed alongside other policy documents in this section, such as the Suffolk Coastal Local Plan (2020), as all local plan documents covering an area should form the Statutory Development Plan.</p>  <p>The map shows the Saxmundham area with various sites and roads. A legend in the top right corner identifies: Waste Sites (orange), Mineral Extraction Sites (blue), Anglian Water Sites (grey), and Consultation Area (black outline). The map includes labels for roads like A12, B1121, and B1119, and locations like Ketsale, Carlton, Saxmundham, and Benhall Green.</p>		
3	Suffolk County Council	General comments	<p>General Paragraph 12.7 has a minor typo: “[...]_ for biodiversity net gain purposes [...]” _ Paragraph 13.1 includes a typo in its second sentence:</p>	<p>Noted. Amend accordingly</p>	<p>Amend paras 12.7 <input checked="" type="checkbox"/> and 13.1 <input checked="" type="checkbox"/></p>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>"In the case of East Suffolk the majority of these relate to national scale energy projects brought about by the significant generation [...]" – Paragraph 13.10 includes a typo in its fifth sentence: "In terms of mitigation".</p> <p>Paragraph 13.15 includes a typo in its second sentence: "Its existing reputation as a historic Suffolk market town and gateway to the East Suffolk coast coast with historic coastal villages".</p> <p>There are some paragraph inaccuracies, including but not necessarily limited to:</p> <ul style="list-style-type: none"> • Paragraph numbers in Chapters 14 and 15 are duplicates of those in Chapter 12 and 13 • Paragraph numbers 13.21 and 13.22 are duplicated • Paragraph 12.17 is duplicated 		<p>Amend 13.10 and 13.15☑</p> <p>Renumber accordingly☑</p>
4	William Notcutt Estates (representations made by Armstrong Rigg Planning)	General comments	<p>Saxmundham Garden Neighbourhood Masterplan Consultation</p> <p>We note that Pigeon has launched a public consultation on their proposed masterplan for the Saxmundham Garden Neighbourhood that runs until 7th September 2025. The draft modified SNDP makes it clear that this masterplan has been developed in consultation with the Town Council and that key elements have been agreed, albeit with some matters of disagreement concerning the extent of proposed employment land. With respect</p>	Noted. The issue is addressed in more detail below.	No change to Plan

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			to these representations, the most notable consideration is that Pigeon's proposed masterplan does not include any of our client's land and it shows 'Suitable Alternative Natural Greenspace (SANG) in excess of guidance requirement' on land within Pigeon's control. This has important implications for the continued allocation of our client's land as SANG as it is now likely that it will not be required for this purpose.		
5	Pigeon Investments (representations made by LDA design)	General comments	<p>These representations are made on behalf of Pigeon Investment Management (Pigeon) and seek to assist the Town Council in its production of an updated Neighbourhood Plan.</p> <p>Pigeon is the promoter of the South Saxmundham Garden Neighbourhood and will play a pivotal role in its delivery. Pigeon has been engaged in productive discussions with the Town Council/Neighbourhood Plan Steering Group throughout the preparation and publication of the 'made' 2023 Neighbourhood Plan and is grateful for the opportunity to comment on this first draft of the 'modified' version, including the new proposed section covering the Garden Neighbourhood.</p> <p>The following general comments are made using the draft Neighbourhood Plan's paragraph references.</p>		No change to Plan

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>1.17 Although ongoing changes to the planning process are anticipated (e.g. the Planning & Infrastructure Act, National Development Management Policies, how East Suffolk Council intends to address new mandatory housing figures) these cannot be considered as reasons for modifying the Neighbourhood Plan at this stage. Details of all the changes being progressed have yet to be published (adopted), so for the time being they cannot be used as justification for modifying the Neighbourhood Plan.</p> <p>2. It's helpful to provide updates to e.g. census information but no clear link is made with the following policies for the garden neighbourhood and NSIPs. If the changes to the planning environment are a reason to modify the Neighbourhood Plan, then it must be demonstrated and justified how these changes have informed new policy.</p> <p>3.4 It is inconsistent to list the 'new' reasons why the Neighbourhood Plan is proposed to be modified but then use them as justification to reintroduce inappropriate (and now out of date) material which was omitted from the adopted version of the Neighbourhood Plan. It is considered, however, appropriate to review existing policies where appropriate changes are justified.</p>	<p>Noted.</p> <p>Noted. Updated census data does not change the Plan, however the reasons for the modification are set out clearly. The change in parish boundary is sufficient justification to modify the</p>	

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				plan. The new policy content is not considered to be out of date or inappropriate.	
6	Pigeon Investments (representations made by LDA design)	General comments	<p>Pigeon Proposal</p> <p>To be consistent with the approach typically adopted for Neighbourhood and Local Plans, it is not appropriate to reference the land controlled by a particular company or its proposals for the land. This can be progressed by other means afforded by the planning process. As such, all reference to Pigeon's land and proposals should be removed.</p>	Noted. Direct references to Pigeon and the masterplan will be removed.	Remove all references to Pigeon and masterplan <input checked="" type="checkbox"/>
7	Historic England	General comments	<p>Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of your Neighbourhood Plan.</p> <p>We welcome the production of the neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We are pleased to see the historic environment features within the new policies within the modified plan.</p> <p>We welcome the new policies contained within Chapters 12 and 13 relating to the South</p>	Noted	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>Saxmundham Garden Neighbourhood, and Mitigating the Impacts of National Infrastructure and Energy Projects on Saxmundham.</p> <p>In relation to policies relating to Saxmundham South Garden Neighbourhood, we welcome the inclusion of design policies to setting out principles of how the new neighbourhood could integrate within the environment and community. We would also refer you back to previous our correspondence during the last plan's consultation.</p> <p>We welcome the production of a policy for mitigating the impact of NSIPs within the plan. We are pleased to see that reference to the historic environment has been made. One recommendation we would suggest is consideration could be given (either in the policy or as a community action) to exploring how proposed mitigation measures could unlock wider heritage benefits for the community. For example, proposals for new walking and cycling routes could also incorporate heritage trails, interpretation or improved wayfinding to the historic town centre.</p> <p>As with our previous engagement on the Saxmundham Neighbourhood Plan, we are pleased to see this is a well-produced and clearly written plan</p>	<p>The point is noted and may be something to be pursued in the future as a project at the appropriate time.</p>	

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			<p>which continues to set out a positive strategy for the historic environment.</p> <p>We refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/.</p> <p>For any specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Cambridgeshire County Council.</p> <p>To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.</p>		
8	William Notcutt Estates (representations made by Armstrong Rigg Planning)	General comments	<p>Summary and conclusion Our client continues to have concerns regarding: Policy SAX6 as it would introduce an undeliverable requirement for Public Rights of Way to be enhanced; Policy SAX11 due to the significant inaccuracies in the evidence presented to justify the</p>	Noted. Policy SAX6 is not proposed for modification and has been tested through	No change to Plan.

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			<p>identification of the Layers as a non-designated heritage asset; and Policy SAX12 as it seeks to protect views that will be subject to significant change if the site is to be delivered as SANG. Our client also continues to support the provision of SANG on their land, but is concerned that it now seems very unlikely that it will be required for this use. As such, we request that a suitable mechanism is introduced into Policy SAX15 that would release our client's land from the SANG allocation once planning permission has been granted for development that doesn't require SANG in this location.</p>	<p>the Examination process where it was not considered to be unreasonable. It was developed with Suffolk County Council (as the PROW authority). Policy SAX11 and 12 are also not proposed to be modified and have been fully tested on Examination. To agree to the suggested change in relation to Policy SAX15 would require a change contrary to the Local Plan and</p>	

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				the Neighbourhood Plan would not be in conformity with it.	
9	Natural England	General comments	Natural England does not have any specific comments on this draft neighbourhood plan.	Noted	No change
10	Environment Agency	General comments	<p>Thank you for consulting us on the Draft Neighbourhood Plan for Saxmundham.</p> <p>We note the Suffolk Coastal Local Plan was recently adopted in 2020, however, we have identified important environmental constraints, within our matrix for currently screening neighbourhood plans, that affect this Neighbourhood Plan Area. We are, therefore, providing you with the following advice which identifies opportunities for you to strengthen the Plan and enhance the scope of environmental Objectives considered.</p> <p>Flood Risk</p> <p>Since our comments on the first draft of the neighbourhood plan, the Flood Map for Planning was updated in 2025 to refresh the flood zones and provide additional flood risk products. Flood risk in Saxmundham has not changed significantly, except</p>	<p>Noted.</p> <p>SG Views: This is a modification to an existing made neighbourhood plan. There is no mandatory Neighbourhood Plan content and therefore there is no obligation for the NP to include such a policy and NPs should not repeat national and strategic policy. This</p>	No change

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			<p>for wider flood zone extents along the two tributaries feeding into the river Fromus. The following is a revised overview of flood risk in Saxmundham which supersedes our 2022 comments. The majority of the Saxmundham lies within Flood Zone 1, however there is a strip of land running through the centre of the town and two further extents, that falls within Flood Zones 2 and 3. The source of the risk is fluvial flooding from the river Fromus and two adjoining tributaries. There are currently a number of residential and commercial buildings within Flood Zone 3 (land with a high probability of flooding) in addition to a significant amount of undeveloped land at risk of flooding from the Fromus. Therefore, we would strongly encourage that flood risk is considered within the neighbourhood plan to inform the location of future development sequentially, and to provide advice for any development that has to occur within Flood Zone 2 and 3, and as such we recommend that the plan is revised to include a policy specifically relating to flood risk.</p> <p>Specific policy and paragraphs We note that the second draft of the neighbourhood plans does not make reference to specific flood risk policy referenced in our 2022 consultation comments which have been reiterated as follows. The neighbourhood plan should reflect</p>	<p>representation is largely requesting wording in the NP that is already present in national or local plan policy. Particularly as the majority of Saxmundham lies within Flood zone 1 and the Neighbourhood Plan is not allocating any specific sites.</p> <p>The Neighbourhood Plan is not allocating any sites and</p>	

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			<p>the flood risk objectives set out in policy SCLP9.5 of the East Suffolk Local Plan. This is in line with paragraph 004 of the Planning Practice Guidance: Neighbourhood Planning which states that a neighbourhood plan should support the delivery of the strategic policies set out in the Local Plan or Spatial Development Strategy. The East Suffolk Strategic Flood Risk Assessment (SFRA) was published in 2018 and should be used to inform policies considering flood risk and how this should be mitigated. You may also find paragraphs 015 to 018 of the Flood risk and coastal change PPG useful in helping you to ensure that flood risk is taken into account in the Neighbourhood Plan (see, Flood risk and coastal change - GOV.UK)</p> <p>We are pleased to see the neighbourhood plan reinforces the requirement for the sequential test, to be applied for any new developments as per our previous 2022 comments. Please see our general flood risk comments below for information on how new development should be designed to not increase flood risk on-site or elsewhere, and how this should be demonstrated in an FRA.</p> <p>Saxmundham contains a significant area of land within Flood Zone 3b (the functional floodplain), we note our 2022 comments are yet been brought forward into the neighbourhood plans. The East Suffolk SFRA states that Flood Zone 3b is the land</p>	<p>therefore should not repeat the flood risk objectives set out in Local Plan policy.</p>	

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			<p>where water has to flow or be stored in times of flood and therefore development in this zone is considered inappropriate unless it is classified as water-compatible development or essential infrastructure. We recommend that the neighbourhood plan reinforces this guidance and safeguards areas of Flood Zone 3b within Saxmundham from future inappropriate development within a policy specifically pertaining to flood risk.</p> <p>We reiterate that If a policy regarding flood risk is not included in a revised neighbourhood plan, we would want to see some wording in the basic conditions statement to demonstrate why it was decided that a policy was deemed not relevant.</p> <p>Page 130 lays out specific mitigation measures, which includes 'mitigating any increase in flood risk...' (page 132). We would like to see a reference to climate change included in this section to reflect the changing nature of flooding and therefore flood risk. We recommend sign posting the 'Check the long term flood risk for an area in England', which should act as a starting point for anyone looking to plan for the future in terms of flood risk and mitigation.</p> <p>We note from the first draft of the neighbourhood plan that the 'opportunity zones' have not changed</p>	<p>The purpose of the Basic Conditions statement is to set out how the policies in the NP are consistent with national and local plan policy. It is not its function to justify the non-inclusion of policy, particularly</p>	

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			<p>(as indicated by the absence of yellow highlighted text). The Street Farm Road 'opportunity-zone', as raised previously, the proposed development option for site 1 (a car park which Annex 3 of the NPPF classes as 'less vulnerable'), is not compatible with Flood Zone 3b (functional floodplain) as detailed in Table 2 of the Flood risk & coastal change PPG). Any development at that location must fall within the water-compatible or essential infrastructure classifications and follow the principles set-out in paragraph 079 of the Planning Practice Guidance: Flood Risk and Coastal Change.</p> <p>We reiterate that sequential testing (under 'sequential approach') and LPA policy requirements should be applied. Any sites identified for development should adhere to point (a) in the East Suffolk Local Plan policy SCLP9.5 which states that neighbourhood plans can allocate land for development in areas at risk of flooding providing it can be demonstrated that there are no appropriate alternative sites. A revised plan should direct all vulnerable development away from areas at risk of flooding or demonstrate how the principles of the sequential test have been met for the 'opportunity zones'.</p> <p>The modified neighbourhood plan makes reference to South Saxmundham Garden Neighbourhood, a</p>	<p>when there is no mandatory Neighbourhood Plan content and the issues is covered by relevant national and local policy.</p> <p>The requested wording repeats Local Plan policy and therefore does not need to be included in the modified NP.</p>	

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			<p>proposed development is wholly in Flood Zone 1. NPPF guidance (footnote 63) states that developments of 1ha or more in Flood Zone 1 must be accompanied by a Flood Risk Assessment.</p> <p>The modified neighbourhood plan makes reference to new policy (SAXEN1), mitigating the impacts of major energy infrastructure projects in the area (page 130). The infrastructure may fall under National Significant Infrastructure (NSIPS). However, for essential infrastructure that may fall outside of this process and may interact with the flood zones, we recommend sign posting to the general guidance for vulnerability and compatibility under paragraph 079 of the PPG. Essential infrastructure classifications, where they interact with i.e Flood Zone 3b (functional floodplain) is required to remain operational and safe for users in times of flood, result in no net loss of floodplain storage and not impede water flows and not increase flood risk elsewhere.</p> <p>[General flood risk guidance for Neighbourhood Plans also included in response]</p> <p>Groundwater and Contaminated Land</p> <p>Some areas of the parish are located in Source Protection Zones 1, 2 and 3. The entire parish is also located on a Principal Aquifer. This means that it is an</p>	<p>The fact that this is mentioned in national guidance means that it does not have to be repeated in an NP.</p> <p>This can be covered by any review of the LP as it will be over a wider area than just Saxmundham</p>	

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			<p>the emerging 2024 Water Resources Management Plan which is due to be published in 2023. The Local Planning Authorities Water Cycle Study and Local Plan may indicate constraints in water supply and provide recommendations for phasing of development to tie in with new alternative strategic supplies.</p> <p>New development should as a minimum meet the highest levels of water efficiency standards, as per the policies in the adopted Local Plan. In most cases development will be expected to achieve 110 litres per person per day as set out in the Building Regulations &c. (Amendment) Regulations 2015. However, a higher standard of water efficiency (e.g. 85 l/p/d) should be considered, looking at all options including rainwater harvesting and greywater systems. Using the water efficiency calculator in Part G of the Building Regulations enables you to calculate the devices and fittings required to ensure a home is built to the right specifications to meet the 110 l/p/d requirement. We recommend all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.</p> <p>Developments that require their own abstraction where it will exceed 20 cubic metres per day from a surface water source (river, stream) or from</p>	<p>content could be included in the Local Plan review.</p> <p>Policy SCLP9.2 of the Adopted Local Plan makes reference to the 110ltr standard. Neighbourhood Plans are not permitted to</p>	

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			<p>underground strata (via borehole or well) will require an abstraction licence under the terms of the Water Resources Act 1991. There is no guarantee that a licence will be granted as this is dependent on available water resources and existing protected rights. The relevant abstraction licencing strategy for your area provides information on water availability and licencing policy at Abstraction licensing strategies (CAMS process) - GOV.UK (www.gov.uk).</p> <p>Biodiversity Net Gain (BNG)</p> <p>On 12 February 2024, Biodiversity Net Gain (BNG) became mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). This means that unless exempt, Developers must deliver a net gain in biodiversity of at least 10%. Consequently, a development will result in more or better-quality natural habitat than there was before development. When a development seeks planning permission from the Local Authority, it needs to confirm whether the development is exempt from BNG.</p> <p>If it is not exempt, the developer will need to provide information about how it is intended to meet the BNG target, including details of proposed significant on-site enhancements.</p> <p>There are 3 ways a developer can achieve BNG.</p>	<p>impose local standards which go beyond those of the Local Plan without justification. There is no local justification for a different standard being applied to the Neighbourhood Area than the district as a whole.</p> <p>Noted however, this is an explanation</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>There are 3 ways a developer can achieve BNG.</p> <ol style="list-style-type: none"> 1. They can create biodiversity on-site (within the red line boundary of a development site). 2. If developers cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. Developers can either make off-site biodiversity gains on their own land outside the development site, or buy off-site biodiversity units on the market. 3. If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government. This should be a last resort. The government will use the revenue to invest in habitat creation in England. <p>Where development falls within 10m of a watercourse, a watercourse metric should be applied to the assessment.</p> <p>We note that this Neighbourhood Plan does not have any allocated sites for development, however the above advice should still be considered for any planning applications submitted.</p> <p>For further information on Biodiversity Net Gain (BNG), such as when developments are exempt, there are details available on Understanding biodiversity net gain - GOV.UK.</p>	<p>of national policy and East Suffolk as the LPA determining any planning applications will no doubt take it into account as appropriate.</p> <p>Noted.</p> <p>Noted.</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>Informative</p> <p>We encourage you to seek ways in which your neighbourhood plan can improve the local environment. For your information, together with Natural England, Historic England and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: How to consider the environment in Neighbourhood plans - Locality Neighbourhood Planning.</p>		
11	Suffolk Wildlife Trust (NOTE: Late response)	General comments	<p>Thank you for asking Suffolk Wildlife Trust to provide comment on the modified Neighbourhood Plan. Our comments relate only to those areas of the plan included within the modification, as per the consultation, but also only relate to wildlife, biodiversity, and nature recovery – the charitable remit of Suffolk Wildlife Trust.</p> <p>Modifying a Made Neighbourhood Plan Suffolk Wildlife Trust understand the rationale behind the proposed modifications. Both modifications have scope to provide improved outcomes for biodiversity which Suffolk Wildlife Trust welcome.</p>	Comments noted	No change
12	Suffolk and North East Essex	General comments	Thank you for consulting with Suffolk and North East Essex Integrated Care Board (ICB) regarding the	Comments noted	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
	Integrated Care Board (NOTE: Late response)		<p>Saxmundham Parish Council Modified Draft Neighbourhood Plan (NP). The ICB is encouraged to see that health and wellbeing is a constant thread throughout the NP and policies are designed to help the residents of Saxmundham obtain healthy and active lives. If residents are able to be more active and healthier then this reduces the impact on local healthcare services. The ICB recognises that Saxmundham does have primary healthcare facilities inside the parish. To maintain a healthcare service for the residents of Saxmundham, mitigation might be sought through Community Infrastructure Levy (CIL) or Section 106 contributions from developments in and around the area.</p> <p><u>Comment relating to NSIPs in the area</u> The ICB has been involved from the very beginning of the various NSIPs in the area. We were part of a working group with colleagues from Suffolk County Council and other key stakeholders on the Sizewell C project. As a result of this work a role has been created to overview the impact of the Sizewell C project on health. We continue to work with project teams, The NSIP Centre of Excellence and district councils on NSIPs and assuring that health and wellbeing are integral to the lasting legacy of the projects.</p>		

INTRODUCTORY AND OTHER CHAPTERS

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
13	East Suffolk Council	Contents page	Minor correction- the page numbers in the table of contents need to be updated as they do not run in order.	Noted. This will be corrected	Update table of contents accordingly <input checked="" type="checkbox"/>
14	East Suffolk Council	Paragraph 1.5	As the plan develops the final sentence of this paragraph should be updated to reflect the latest position in relation to the Local Plan. ESC officers can advise on specific wording at the appropriate point.	Noted. This will be updated in due course	Update 1.5 accordingly <input checked="" type="checkbox"/>
15	East Suffolk Council	Paragraph 1.17	In relation to new housing need figures for East Suffolk, the Council's latest position is set out in the East Suffolk Housing Position Statement which is available from here: https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/open-data/housing-land-supply/ . The latest statement is from March 2025, but this will be updated in September 2025 to reflect the Suffolk Coastal Local Plan becoming 5 years old.	Noted.	A reference can be included in 1.17. <input checked="" type="checkbox"/>
16	East Suffolk Council	Transport, movement and access Paragraph 2.19- 2.24	Since the last NP was drafted, the council has adopted the East Suffolk Cycling and Walking Strategy. This includes specific recommendations which you may want to consider referencing in the Modified NP, either here, or in section 9. Parish wide: Transport and movement. The strategy is available here:	Noted. A reference in the supporting text can be added	Update accordingly (Added to paragraph 9.10 in Chapter 9) <input checked="" type="checkbox"/>

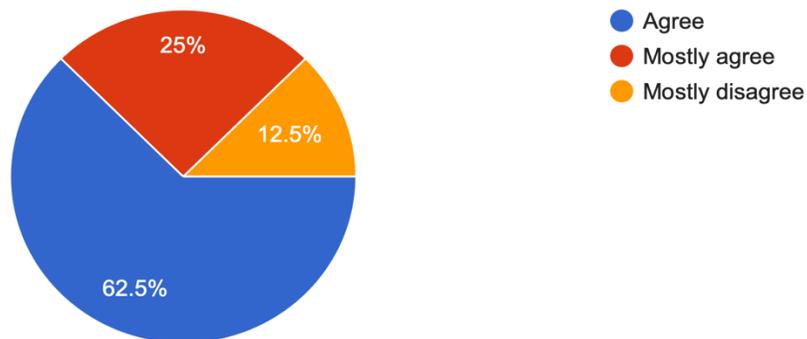
Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/		
17	East Suffolk Council	Paragraph 2.27	Suffolk County Council will be able to advise further on the latest position in relation to education capacity in the NP area.	Noted	No change
18	East Suffolk Council	Figure 18	For the avoidance of doubt, it would be helpful if all figures in the modified NP where the Parish boundary is shown reflected the new boundary.	Noted. These can be updated accordingly	Update mapping to reflect new parish boundary <input checked="" type="checkbox"/>
19	East Suffolk Council	Paragraph 3.1	Minor typo- 'uported' should read 'supported'.	Typo to be corrected	Amend 3.1 <input checked="" type="checkbox"/>
20	East Suffolk Council	Paragraph 4.2	Minor typo- 'objective' should read 'objectives'	Typo to be corrected	Amend 3.1 <input checked="" type="checkbox"/>
21	East Suffolk Council	Objective SSGN1, Page 35 and throughout	This objective should be clear what "garden city" principles it is referring to as there is a lot of differing guidance available. It may be more accurate to refer to '21st century garden city principles'. See paragraph 3.27 of the Local Plan for further reference.	Noted. Include updated reference	Amend Objective SSGN1 <input checked="" type="checkbox"/>
22	East Suffolk Council	Glossary	The definition of Suitable Alternative Natural Greenspace (SANG) should be consistent with the definitions provided in ESC's Healthy Environment SPD (see earlier comment for link).	Amend glossary accordingly	Amend glossary <input checked="" type="checkbox"/>
23	Suffolk County Council	General and paragraph 2.27	Education SCC, as the Education Authority, has the responsibility for ensuring there is sufficient	Noted, that the occupancy at the existing Primary School	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>provision of school places for children to be educated in the area local to them. This is achieved by accounting for existing demand and new developments. SCC, therefore, produces and annually updates a five-year forecast on school capacity. The forecast aims to reserve 5% capacity for additional demand thus the forecasting below may refer to 95% capacity. The information below is to inform the Neighbourhood Planning Group's understanding of educational provision in the Plan Area and does not need to be included in the Plan.</p> <p>Paragraph 2.27 SCC records indicate that the primary school has a capacity of 315 places. As at the January 2025 census there were 254 pupils on roll.</p>	is lower than when the existing Neighbourhood Plan was made.	
24	Suffolk County Council	Paragraph 2.4	<p>Health and Wellbeing</p> <p>Paragraph 2.4 presents Census 2021 data showing that 22.9% of the Saxmundham Parish population is aged 65 and over, compared to the England average of 18.6%. This indicates a relatively older population in the area, which has clear implications for future housing provision. It is therefore important that new development is designed to be inclusive and accessible to all age groups, particularly older residents, while also</p>	Noted. The issue is covered by SCLP5.8 in the Local Plan	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>meeting the needs of families and younger people.</p> <p>A key mechanism to support ageing in place is the provision of homes built to the optional standards of Building Regulations Part M4(2) 'accessible and adaptable dwellings' and, where appropriate, M4(3) 'wheelchair user dwellings'. The Suffolk Coastal Local Plan (2020), through Policy SCLP5.8, requires that on proposals of 10 or more non-specialist dwellings, at least 50% must meet the M4(2) standard.</p>		
25	Pigeon Investments (representations made by LDA design)	Vision and Objectives	<p>4.1 Vision and Objectives</p> <p>Pigeon supports the Neighbourhood Plan's Vision, particularly in relation to</p> <ul style="list-style-type: none"> • Improving Saxmundham's prosperity through the provision of varied employment opportunities. • Providing housing to meet current and future residents' requirements. • Providing enhanced green infrastructure and access to the countryside. • Integrating new development 	Support noted	No change

SAXGN1: Connecting the Garden Neighbourhood

16 responses



Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
26	East Suffolk Council	Paragraph 12.1	The explanation given here is useful for the purposes of the Reg 14 plan but, given the explanation earlier in the plan (1. Modifying a 'Made' Neighbourhood Plan), the text here could be reduced. In particular the text from 'However....' onwards.	Noted. This will be updated for the Submission plan in any event	Amend accordingly <input checked="" type="checkbox"/>
27	East Suffolk Council	Paragraph 12.3	Minor typo - 'brough' should be 'brought'	Typo to be corrected	Amend accordingly <input checked="" type="checkbox"/>
28	East Suffolk Council	Paragraph 12.4	For clarity, suggest this is re-worded to read 'Policy SCLP12.29 of the Local Plan allocates 67.8ha of land for a mixed-use development including residential,	Amend accordingly	Amend 12.4 <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			employment and community uses. The policy outlines that the masterplan should include the following elements:.....'		
29	East Suffolk Council	Paragraph 12.5	This paragraph states 'The allocation provides for a community hub within the residential and mixed-use areas and an employment area.' The wording for this could be tightened as it currently reads as if the mixed-use area is separate from the community hub whereas that my not be the case.	Amend accordingly	Amend 12.5 <input checked="" type="checkbox"/>
30	East Suffolk Council	Paragraph 12.5	This paragraph states '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 only (and not for built development), the siting and layout of the new development is left for the collaborative master-planning process to address.' This is not correct. Whilst some of the uses are more fixed in their location, the masterplan process is more than about fixing land uses and therefore these elements are still part of the masterplan process.	Appreciated that the masterplan process is more than 'fixing land uses. The point being made in 12.5 is that some elements are not fixed in location and therefore the NP policies could include	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
				some guidance on where they could be located.	
31	East Suffolk Council	Pigeon Proposal Paragraph 12.6/12.7	While the explanation given here provides some context for the purposes of the Reg 14 consultation, it is questioned whether a response to the 'Pigeon proposal' is appropriate within the NP. It is not the place of the NP to provide communication on the work of a developer or to provide communication on a potential forthcoming application. The forthcoming application will need to speak to the inclusion of additional land, and it is not the role of the NP to comment on this. It is considered that this section should be removed.	Noted. Reference to Pigeon will be removed.	Remove Pigeon references <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
32	East Suffolk Council	Proposed Employment/Commercial area west of A12 Paragraph 12.8/12.9	This chapter refers to land which has no planning status, either within the Local Plan or within the Neighbourhood Plan. It is our very strong view that the NP should not include any reference to the 'extra' employment land.	Noted. The site is not 'employment' currently.	References to Pigeon proposal and its content to be removed. Remove 12.8 and 12.9 <input checked="" type="checkbox"/>
33	East Suffolk Council	Proposed Employment/Commercial	The title of this section should be amended to read 'Proposed	Noted.	Amend title <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
		area west of A12, Paragraphs 12.8/12.9	Employment area west of A12' as it is an employment allocation not a commercial allocation.	Amend section accordingly	
34	East Suffolk Council	Proposed Employment/Commercial area west of A12, Paragraphs 12.8/12.9	The NP should not directly reference the Pigeon masterplan. The NP needs to focus on the allocated site. It should also avoid referring to specific policies within the Local Plan in which the land outside of the allocation would need to comply with, as the interpretation of the exact uses are yet to be determined and a position needs to be reached by the Local Planning Authority rather than by the NP. This could be misleading should the LPA's position differ from that set out by the NP.	Noted. References to the Pigeon masterplan and its content will be removed . The LPA position should reflect the LP policies in respect of land outside fo the allocation.	Remove references to Pigeon and masterplan content. <input checked="" type="checkbox"/>
35	East Suffolk Council	Proposed Employment/Commercial area west of A12, Paragraphs 12.8/12.9	It is considered that this section misses the opportunity to set out potential policies relating to the employment use, for example the Neighbourhood Plan Steering Group have discussed concerns over light pollution and therefore the NP may want to speak to this in relation the employment allocation.	Noted.	Make reference to light pollution <input checked="" type="checkbox"/>
36	East Suffolk Council	AECOM work to support the adopted	The AECOM work on the garden neighbourhood does not wholly	Noted	Remove reference to

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
		neighbourhood plan Paragraph 12.10/12.11/12.12	align with the masterplan that is being prepared for the SSGN. The Local Plan allocation policy (SCLP12.29) requires a masterplan to be prepared but does not set out a format in which this needs to be done i.e. by the developer or by the neighbourhood plan group. Officers would be deferring to the developer masterplan rather than the AECOM work due to it having gone through extensive pre-app discussions with the LPA and it factoring in the requirements of the developer to ensure it would be deliverable. It is recommended that reference to the AECOM document should be removed from the NP to avoid conflicts over which masterplan is the one that should be carried forward on the site.	Agree to remove reference to AECOM Masterplan	AECOM masterplan <input checked="" type="checkbox"/>
37	East Suffolk Council	Paragraph 12.13	Suffolk County Council will be able to advise further on the latest position in relation to education provision in the NP area and any future plans for this site.	Noted	No change
38	East Suffolk Council	Paragraph 12.13	Should remove reference to the Pigeon proposal. It would be	Noted.	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			better if the NP just spoke to the importance of connections into the town rather than describing the masterplan proposal.		
39	East Suffolk Council	Objective SSGN2	It is unclear how the SSGN can 'environmentally' integrate into the existing town. It is not clear if this point is meant more in relation to the landscape context or the PROW network. This should be clarified within the objective wording.	Noted. This is in relation to landscape, townscape and ecological connections rather than PROW and has been a long term objective.	No change to Plan
40	East Suffolk Council	Paragraph 12.14	Reference to the AECOM masterplan should be removed as per earlier comment.	Noted	Remove reference <input checked="" type="checkbox"/>
41	East Suffolk Council	Paragraph 12.14	'garden city' principles definition should be clarified as per earlier comment.	Noted – 21 st century principles will be referred to	As per earlier comment <input checked="" type="checkbox"/>
42	East Suffolk Council	Paragraph 12.15	The NP group need to consider the appropriateness of setting a vision for the site when this has already been set out in the Local Plan policy and developed by the developer for inclusion in the forthcoming application (which could be submitted ahead of the NP having significant weight).	Agree to remove the word 'vision' and replace with 'ambition'. It is recognised that an application may be submitted	Remove 'vision' and replace with 'ambition' <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
				before the Modified NP has been completed. However, the application may not be determined and it is also possible that there may be further applications submitted on the site in respect of phases and details to which the NP policy would be applicable.	
43	East Suffolk Council	Paragraph 12.15	This paragraph needs to be clear that 'informal green spaces, parks, public squares, sports pitches, community gardens, large street trees, hedgerows and so on.' are examples of what 'could' go in, but not necessarily what 'would' go in.	Noted. It can be made clear these are examples	Amend 12.15 accordingly <input checked="" type="checkbox"/>
44	East Suffolk Council	Paragraph 12.16 (a)	Achieving a 'rural / countryside feel' across the site will not be possible with the housing	The ambition for the site is to create a more	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			numbers that need to be delivered and would not result in an efficient use of land (as required by the Local Plan and NPPF). There may however be opportunities to respond to the rural edges through a sensitive landscape scheme and potentially lowering densities (subject to appropriate urban design studies rationalising this).	rural and green feel as per the 'garden city principles'. However it is recognised that there will be some more urban parts of the site with lower density at the edges encouraged.	
45	East Suffolk Council	Paragraph 12.16 (a)	The point around pedestrian and cycle movements would benefit from being split out into a separate point to avoid it being lost in a wider point around responding to the rural surroundings.	Noted. Amend accordingly	Amend 12.16 a <input checked="" type="checkbox"/>
46	East Suffolk Council	Paragraph 12.16 (b)	Again, this paragraph needs to be clear that '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' are examples of what 'could' go in, but not necessarily what 'would' go in. It would be more accurate	Noted. It will be made clear these are examples	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			to state 'such as' rather than 'including'.		
47	East Suffolk Council	Paragraph 12.17	<p>The wording here needs to be reconsidered to make it clear that the 'physical' objective does not directly align with the NPPF- the three overarching objectives of achieving sustainable development set out by the NPPF are economic, social and environmental.</p>	<p>Whilst the NPPF objectives include economic, the physical integration of this development is important. This objective does not have to align with the NPPF but it is not contradictory it is merely adding to detail as to how environmental and social integration will be achieved. Reference to NPPF to be removed.</p>	Remove reference to NPPF☑
48	East Suffolk Council	Paragraph 12.18	<p>This paragraph states 'any future development in the Garden Neighbourhood site should take the name of the site literally and aim to create a rural countryside</p>	<p>Agree to amend and remove 'rural'</p>	Amend accordingly☑

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			feeling for the area' this point conflicts with the principles of a 21st century garden city. It would be beneficial if the modified NP defined clearly what is meant by 'rural' in this context.		
49	East Suffolk Council	Paragraph 12.19	Reference to pre-application discussions with Pigeon should be removed as these are private and confidential.	Noted. Although the paragraph mentions the principal of pre-application discussion and not the details. For a development of this size pre-application discussions are inevitable.	Reference to Pigeon to be removed. <input checked="" type="checkbox"/>
50	East Suffolk Council	Paragraph 12.21	The relevance of the point relating to third party ownership is not clear. This should be explained or removed.	Suggest reword to make it clear that developer is not in control of this piece of land	Amend accordingly Remove reference to 'commercial areas'. <input checked="" type="checkbox"/>
51	East Suffolk Council	Paragraph 12.23	The wording here should be amended from 'need' to 'should'. E.g. the junction with the South Entrance <u>should</u> be	Agree	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			improved to ensure safe transition to the road network.		
52	East Suffolk Council	Connections between the residential areas of the garden neighbourhood and the proposed commercial area west of the A12 Paragraph 12.25/12.26/12.27	These paragraphs should be removed as per earlier comment.	Noted. Reference to Pigeon and the masterplan to be removed.	Amend accordingly <input checked="" type="checkbox"/>
53	East Suffolk Council	Paragraph 12.26	Some of the wording of this paragraph could be incorporated into the policy instead of the preamble as it reads as policy requirements.	Noted. We will review this	Review 12.25 and 12.26 as appropriate <input checked="" type="checkbox"/>
54	East Suffolk Council	Figure 36	Suggest the connection across the A12 is moved to align with the existing PROW route. The crossing across the Kiln Lane level crossing should also be shown.	Noted. No 7 is shown incorrectly	Amend figure 36 accordingly <input checked="" type="checkbox"/>
55	East Suffolk Council	Policy SAXGN1	Suggest that 'Development proposals for the Garden Neighbourhood will be expected to ensure that excellent connectivity, is provided for all users, including those with a mobility impairment' is amended to: '.... Excellent connectivity is provided for all users, including those who share protected	Noted. The suggested wording is less clear to the average reader	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			characteristics'. This broadens the inclusivity of this comment.		
56	East Suffolk Council	Policy SAXGN1	As per earlier comments, point C should remove reference to 'commercial areas' in order to align with the Local Plan policy.	Noted. Agree to amend	Remove reference to 'commercial' <input checked="" type="checkbox"/>
57	East Suffolk Council	Policy SAXGN1	The policy states 'Such links will be implemented at the outset of the development (Phase 1) prior to the occupation of new dwellings.' The phasing for the development is yet to be agreed so greater flexibility to this statement should be applied. Suggest this is amended to read 'Such links should be implemented early on in the development to ensure active travel habits are established for new residents.'	The suggested wording weakens the paragraph and provides less clarity.	No change
58	East Suffolk Council	Policy SAXGN1	The policy states 'New and enhanced pedestrian and cycle connections will include:' this should be amended to read 'New and enhanced pedestrian and cycle connections <u>should</u> include:' Points i, ii and iii should also be amended from 'will' to 'should'. It is not clear if these connections are deliverable. In general, points	These are very important connections that are required to ensure a sustainable development. Point ii) can be amended to refer to the	Amend ii) and iii) accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			i to iii should be rephrased to require the development to 'consider' their delivery.	need to dismount. iii) can be amended to 'should' as far as practicable and b) which <u>would</u> forge a strong...	
59	East Suffolk Council	Policy SAXGN1	Point iii(b) should be less specific about the exact location of this connection as it is unclear whether a connection west of the school would be realistic given timeframes.	Agree to add 'where practicable'	Amend accordingly. Note 'where practicable' already added at the beginning of the clause <input checked="" type="checkbox"/>
60	East Suffolk Council	Policy SAXGN1	Point iv should remove reference to a guided bus way and reference bus gates instead. It is unrealistic that a guided bus way would be viable or realistic given it wouldn't have an onward connection outside of the site.	Noted. Agree to amend accordingly	Amend accordingly <input checked="" type="checkbox"/>
61	East Suffolk Council	Policy SAXGN1	Points v to xii are generally complex and it is difficult to understand what is advisory, what is a request and what is mandatory for compliance.	Points to be reviewed for clarity	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
62	East Suffolk Council	Policy SAXGN1	Point v may not want to specifically reference the street layout but more the general layout of the development to integrate the existing PROW network.	Noted. Amend accordingly to remove 'street'	Amend v <input checked="" type="checkbox"/>
63	East Suffolk Council	Policy SAXGN1	Point vi should be changed to 'should' wording rather than stated as 'essential'	Agree it would be consistent with the other points	Amend accordingly <input checked="" type="checkbox"/>
64	East Suffolk Council	Policy SAXGN1	Point vii should clarify what is meant by a circular green route.	Amend accordingly to make reference to around the perimeter of the housing area between the railway and the A12 and that it is not a cycle route.	Amend vii <input checked="" type="checkbox"/>
65	East Suffolk Council	Policy SAXGN1	Point ix should be removed due to other opportunities being explored to develop this connection.	Noted . Following meeting with ESC it was agreed this is being achieved outside of the NP process.	Amend accordingly <input checked="" type="checkbox"/>
66	East Suffolk Council	Policy SAXGN1	Point xi should be removed as there is no clear justification for a	Agree to delete reference to a	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			new bridge to the south of the site. Instead, the NP could look to promote the retention of the level crossings.	bridge and replace residents with users.	
67	East Suffolk Council	Policy SAXGN1	Point xii seems to repeat points made by v. consideration could be given to merging these two points.	Amend xii to delete second part and add where practicable	Amend accordingly☑
68	East Suffolk Council	Policy SAXGN1	Point xiii should not refer to 'commercial' as per earlier comments.	Agree. Remove 'commercial'	Amend accordingly☑
69	East Suffolk Council	Policy SAXGN1	Point xiv Should be amended to read 'An enhanced pedestrian and cycle crossing as part of the strategic movement network should be provided by the development, running on a south-west/north-east axis through the development and across the A12. Where new routes are to be provided...'	Amend accordingly	Amend xiv☑
70	Suffolk County Council	Policy SAXGN1 and chapter	Archaeology Chapter 12 – South Saxmundham Garden Neighbourhood Archaeology and the historic environment are not currently addressed in this new chapter and SCC advises that a	Amend para 12.4 accordingly but remove reference to Masterplan	Amend 12.5☑

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>paragraph is added in line with paragraphs 12.316 and 12.317 of the Suffolk Coastal Local Plan (2020)1. It is recommended to add a statement along the lines of the following:</p> <p><i>“This site has high archaeological potential. It is situated in a favourable location for archaeological activity, overlooking the River Fromus on an area of light soils. To the north, in a similar topographic location, prehistoric and Anglo Saxon settlement has been identified. Within the site, an undated double line cropmark runs the length of the site parallel to the river. Finds of Iron Age, Roman, Anglo Saxon and medieval date have also been recorded from immediately adjacent fields. Geophysical survey has been undertaken and further archaeological assessment is required. Suffolk County Council have highlighted that archaeological assessment should be required to inform the Masterplan to inform viability of</i></p>		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p><i>schemes, mitigation requirements and conservation in situ of significant remains. Any mitigation should involve outreach proposals. There should be early consultation with the Suffolk County Council Archaeological Service (SCCAS) regarding proposals."</i></p> <p>In addition, Policy SCLP12.29 of this Neighbourhood Plan states that that the masterplan should include: "j) Design and development of the site which, having regard to the Council's South Saxmundham Garden Neighbourhood Heritage Impact Assessment, is sympathetic to the south entrance of Saxmundham, the Conservation Area and heritage assets, and views of the sensitive landscape and heritage setting to the east. A heritage impact assessment will be required; k) Proportionate archaeological assessment;"</p> <p>These points should be added to or referenced in paragraph 12.4 of the Neighbourhood Plan to</p>		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			provide clarity to prospective developers.		
71	Suffolk County Council	Paragraph 12.4	<p>Paragraph 12.4</p> <p>The text outlines several key elements proposed for inclusion within the Garden Neighbourhood, including 'Green infrastructure, including informal and formal open spaces, circular walks', 'Formal recreation areas for all ages including play space', 'Community hub', 'Design and layout which supports a dementia friendly environment' and 'Significant pedestrian and cycle accessibility throughout the site with connections and improvements to networks beyond the site, including to the station and town centre'. Public Health welcomes these proposals, which align with principles that support physical activity, social connection, mental wellbeing, and healthy ageing. SCC particularly supports the emphasis on inclusive design, active travel, and accessible</p>	Support noted	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			green space as integral features of a healthy neighbourhood.		
72	Suffolk County Council	Paragraphs 12.35 and 12.36	<p>Paragraphs 12.35 and 12.36</p> <p>A positive vision is set out for enhancing local health and wellbeing through the integration of indoor sports facilities as part of the Garden Neighbourhood development. These aspirations align closely with Public Health objectives to increase physical activity, reduce health inequalities, and promote community cohesion through equitable access to recreational opportunities.</p>	Support noted	No change
73	Suffolk County Council	Paragraph 12.17	<p>Natural Environment</p> <p>Paragraph 12.17 For the second bullet point mentioning environmental integration, the connectivity of Green Infrastructure should not only be between town and new settlement, but also between the new settlement and the surrounding countryside. This is covered in Policy SAXGN2 and should also be reflected here.</p>	Amend accordingly	Amend 12.17 <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
74	Pigeon Investments (representations made by LDA design)	General reference to Pigeon	Pigeon Proposal To be consistent with the approach typically adopted for Neighbourhood and Local Plans, it is not appropriate to reference the land controlled by a particular company or its proposals for the land. This can be progressed by other means afforded by the planning process. As such, all reference to Pigeon's land and proposals should be removed.	Comments noted. Reference to Pigeon will be removed	Remove Pigeon references <input checked="" type="checkbox"/>
75	Suffolk County Council	Policy SAXGN1	<i>Policy SAXGN1: Connecting the Garden Neighbourhood</i> This policy refers to improving Footpath 12 in criterion iii.a. SCC welcomes and supports the Parish Councils aspiration to upgrade the PROW providing it meets the criteria, and notes that these can be funded by other developments beyond the garden village. Early engagement with the application is encouraged and welcome. The following clarification is recommended to be added after criterion iii.b:	Amend accordingly	Insert after <input checked="" type="checkbox"/> criterion iii.b

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p><i>"Improvements, such as those above, to pedestrian and cycle connections will continue to be sought, where appropriate, from future developments to support the delivery of safer and more attractive options for local travel."</i> _</p>		
76	Suffolk County Council	Policy SAXGN1	<p>Transport</p> <p>SCC, as the Local Highway Authority, has a duty to ensure that roads are maintained and safe as well as providing and managing flood risk for highway drainage and roadside ditches.</p> <p><i>Policy SAXGN1: Connecting the Garden Neighbourhood</i></p> <p>SCC notes that the second paragraph of this policy outlines that pedestrian and cycle connections "must be convenient and direct, in order to avoid use of the single vehicular access to the Garden Neighbourhood via the A12"._ _</p> <p>However, it is recommended that this be amended to clarify that</p>	<p>Amend accordingly</p>	<p>Amend accordingly <input checked="" type="checkbox"/></p>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>the purpose is of pedestrian and cycle infrastructure is to reduce reliance on private motor vehicles.</p> <p>Reference is made to a “guided bus way” in Policy SAXGN1. This should be amended to a “<i>public transport connection</i>” _so that it is not so specific</p> <p>Policy SAXGN1 part XI: there has been no clear justification set out for the need for a new bridge to the south of the site. SCC does not at this point consider it necessary.</p>	<p>This is amended as a consequence of ESC comments above.</p> <p>Reference to bridge is to be removed</p>	
77	Pigeon Investments (representations made by LDA design)	Objective SSGN1	<p>Objective SSGN1</p> <p>Rather than ‘garden city principles’, this should reference garden neighbourhood principles – reflecting the approach being taken to the South Saxmundham Garden Neighbourhood.</p>	Noted. See also ESC comments about garden city principles	See above <input checked="" type="checkbox"/>
78	Pigeon Investments (representations made by LDA design)	Policy SAXGN1	<p>Strategic context for the Local Plan allocation</p> <p>The need for collaboration to bring forward a Masterplan Framework Document has been recognised by the level of sustained engagement</p>	Noted	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>undertaken with Saxmundham Town Council (STC), the Neighbourhood Plan Steering Group (NPSG) and wider community representatives since late 2023. Workshops undertaken with East Suffolk District Council (ESDC) and the Neighbourhood Plan Steering Group since late 2024 should also be noted.</p> <p>From the collaborative work undertaken to date it has been identified that the Garden Neighbourhood and employment opportunities to the west of the A12 have the potential to provide certain uses on-site while reasonable financial contributions can be made to the provision of off-site services and facilities – the proposed Modified Neighbourhood Plan should recognise this approach to services and facilities provision.</p>	Saxmundham Town Council has responded separately to the proposed Masterplan	
79	Pigeon Investments (representations made by LDA design)	Objective SSGN2, supporting paragraphs	<p>Objective SSGN2</p> <p>This Objective should fully reflect the potential for integration reflecting the collaborative work undertaken since late 2023.</p>	<p>Noted</p> <p>This is to be amended as a consequence of other</p>	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>Paragraph 12.15 references some outcomes for the Garden Neighbourhood which would be difficult to assess when monitoring the Neighbourhood Plan – further consideration is required to the matters raised e.g. formal sports pitches are not part of the proposals included in the Masterplan Framework Document being worked on collaboratively.</p> <p>Paragraph 12.16 refers to matters that are not part of the proposals included in the Masterplan Framework Document being worked on collaboratively e.g. pedestrian/cycle access to Benhall. However, it is understood that separate proposals are being progressed by STC, ESDC and Benhall Parish Council regarding a pedestrian/cycle active travel link between the village and town.</p> <p>Paragraph 12.18 refers to 'a rural countryside feeling' but this does not accurately reflect the</p>	<p>representations. The Neighbourhood Plan serves a different function to the Masterplan and there is not a contradiction.</p> <p>Noted.</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>planning policy objectives for the allocation contained within the Adopted Local Plan.</p> <p>Paragraph 12.21 refers to third party land ownerships, implying perhaps that this may create difficulties in achieving active travel links. In view of the collaborative work undertaken on the Masterplan Framework Document being produced it is considered that this aspect of the paragraph needs rewording to more accurately reflect the various initiatives that have been agreed to be pursued.</p> <p>Paragraph 12.22 mentions an active travel link from the Garden Neighbourhood to Lincoln Avenue and Seaman Avenue. Based on the collaborative work undertaken on the Masterplan Framework Document being produced, this should be referenced as 'non-essential' to the creation of active travel links from the Garden Neighbourhood to the town.</p>	<p>See response to ESC comment above.</p> <p>Paragraph 12.21 to be amended to remove last sentence.</p> <p>This is considered to be an important connection to ensure that the development is sustainable.</p> <p>Comments noted however this link is</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>Paragraph 12.23 also describes 'essential' active travel links to the 'northwest' of the Garden Neighbourhood – see comments to paragraph 12.22 above, as they also apply in this case.</p> <p>Paragraph 12.26 refers to a pedestrian/cycle active travel link between Benhall and Saxmundham. It needs to be made clear that this is being progressed by STC, ESDC and Benhall Parish Council and while desirable is not directly related to the delivery of the Garden Neighbourhood.</p>	<p>viewed as essential to the sustainability of the Garden Neighbourhood</p> <p>Noted this is being led by ESC and is a current flagship project of the Walking and Cycling Strategy.</p> <p>Delete 12.26 d)</p>	
80	Pigeon Investments (representations made by LDA design)	Policy SAXGN1	<p>SAXGN1: Connecting the Garden Neighbourhood</p> <p>Matters raised by this draft policy are inconsistent with the collaborative work undertaken on the Masterplan Framework Document being produced. These could maybe be referred to in the lower-case commentary, but should be removed from policy text i.e. references to:</p>	<p>Comments noted. The policy matters and the draft masterplan are not wildly inconsistent.</p> <p>This is a standard</p>	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<ul style="list-style-type: none"> • LTN 1/20. This is over-prescriptive and should be removed. Retain the previous sentence, 'This provision.....links where appropriate'. • active travel links to be implemented at the outset of development and an active travel link to the west of the former secondary school site. • bus link/guided busway. • active travel link between Benhall and the Garden Neighbourhood. • cycling over existing rail crossing bridge. • a further rail crossing bridge. <p>To make all these matters part of the requirements of SAXGN1 would impact on the delivery of the South Saxmundham scheme, so early dialogue with STC/NPSG is requested to satisfactorily address these matters.</p>	<p>reference required by Suffolk County Council.</p> <p>Reference to guided bus is to be removed as a consequence of other representations as is reference to the bridge. Which will be amended to refer to a path either side the railway crossing</p> <p>Noted</p>	
81	Pigeon Investments (representations made by LDA design)	Supporting paragraphs	Paragraph 12.29 says the 'Local Plan proposes that the entire area east of the railway but adjacent to the town, is for 'open space' and Suitable Alternative Natural Greenspace (SANG) (possibly with some part in	Noted. It is believed the current wording is consistent with the Local Plan.	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>existing agricultural use)' implying perhaps that this whole area is to be used for SANG. Local Plan policy is quite clear that 'The Layers' can remain in agricultural use.</p> <p>Paragraph 12.30 talks about 'an area of 'amenity greenspace' west of the A12 and south of the proposed employment and commercial areas. It goes on to say 'it is likely that this will form part of the Biodiversity Net Gain (BNG) for the proposal and therefore its ecological value and connectivity to other parts of the Garden Neighbourhood enhanced. The Neighbourhood Plan is supportive of this area of amenity green/SANG biodiversity net gain.'</p> <p>It should be made clear that there are currently no proposals to provide SANG to the west of the A12.</p> <p>It should also be clarified what the Neighbourhood Plan means by 'would not support the use of</p>	<p>Noted. This is not part of the site allocated in the Local Plan and will be removed.</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>additional land for further development west of the A12.' It is worth recalling the statement in para</p> <p>4.1 'The Vision and Objectives' where the Plan states that a key objective is:</p> <p>'Improving Saxmundham's prosperity through the provision of varied employment opportunities.'</p> <p>The proposal that is the result of the continuing collaborative work on the scheme is for roadside services and through the likely components of this part of the scheme the potential to create an important number of service job opportunities should be acknowledged. This proposal represents one of the best prospects of delivering the Plan's Employment Vision.</p> <p>Figure 37 is not consistent with the proposals included in the Masterplan Framework Document being worked on</p>	<p>Figure 37 is to be amended as a consequence</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>collaboratively. It needs updating.</p> <p>Paragraph 12.31 refers to 'facilities' (e.g. public toilets) which are inconsistent with the proposals included in the Masterplan Framework Document being worked on collaboratively and so needs updating.</p>	<p>of other representations</p> <p>Paragraph can be amended to make it clear these are potential examples.</p>	
82	Suffolk Wildlife Trust (NOTE: Late response)	Policy SAXGN1	<p>Proposed changes to Area Wide Objectives</p> <p>SSGN1 Suffolk Wildlife Trust note that "garden city principles" support that development should enhance the natural environment, provide a comprehensive green infrastructure network, net biodiversity gains, and use zero-carbon and energy-positive technology to ensure climate resilience. Suffolk Wildlife Trust therefore support that the principles of a garden city are delivered throughout proposed new development.</p>	Support noted	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
83	Suffolk Wildlife Trust (NOTE: Late response)	Objectives	<p>Proposed changes to Area Wide Objectives</p> <p>SSGN2 The integration of the new neighbourhood into the town for new residents could also include new wildlife that may become resident. Key species present in the town include Suffolk Priority Species1 birds such as swift and house sparrow. Provision for these species should be included within the garden neighbourhood in good number, with habitat and connectivity considered in addition to nesting features.</p>	Comments noted. This point is covered in Policy SAX13 which is applicable to the whole Neighbourhood Area including the Garden Neighbourhood.	No change
84	Suffolk Wildlife Trust (NOTE: Late response)	Chapter 12	<p>Suitable Alternative Natural Greenspace</p> <p>Suffolk Wildlife Trust highlight and support the provision of suitable provision of SANG which is an important part of large-scale residential development in this area. The originally proposed area for SANG, east of the railway line, now appears questionable based upon</p>	Comments noted.	<p>The words nature conservation could be replaced by 'biodiversity in SAX 15.</p> <p>Amend SAX 15 accordingly <input checked="" type="checkbox"/></p>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>recently shared consultation plans¹.</p> <p>The provision of adequate greenspace is not only an essential part of garden city principles, but essential in ensuring that the development does not contribute to significant increases in recreational pressure on important wildlife sites along the Suffolk Coast. The provision of as large an area as possible, above the minimum requirement, will also maximise the potential for delivering genuine biodiversity uplift while offering greater certainty that the primary purpose of the SANG is delivered.</p> <p>Advice should be sought in the design of the SANG to ensure that it delivers for nature as well as for people. The space should also seek to help new residents connect with nature through design, infrastructure, and interpretation.</p>	<p>Policy SAX15 makes reference to the location and design of the SANG</p>	

¹ <https://saxmundhamsouth.co.uk/masterplan/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
85	Suffolk Wildlife Trust (NOTE: Late response)	Policy SAXGN1	<p>Overall Design</p> <p>The overall design on the new development should look to integrate features of benefit to biodiversity; this can include planting of native species or species with known benefits to wildlife, the creation of green or blue corridors through the development, management plans which reduce uses of pesticide and herbicide and use a relaxed mowing regime to promote biodiversity, the inclusion of species specific enhancements such as bird and bat boxes in high numbers and installed in suitable locations.</p> <p>Given the location of the site and the proposed principles, Suffolk Wildlife Trust would expect to see a design which priorities biodiversity and connecting new residents with nature and urge that high aspirations for an above and beyond approach to the development are delivered, with the scheme aiming to reach the standards laid out in the</p>	Comments noted. These points are largely covered by the Local Plan and by Policy SAX13.	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			emerging East Suffolk Developer's Charter ² .		
86	Suffolk Wildlife Trust (NOTE: Late response)	Policy SAXGN1	<p>Biodiversity Net Gain</p> <p>Suffolk Wildlife Trust acknowledge that statutory requirements for Biodiversity Net Gain are to deliver at least 10%.</p> <p>However, by including the aspiration that the Garden Neighbourhood should deliver at least 20%, there would be a greater confidence that a genuine net gain would be provided, and true delivery of garden city principles regards biodiversity met (in line with SSCN1).</p> <p>The ambition for an aspiration to deliver 20% net gain has been shown to be viable across Suffolk, with the inclusion in the recently adopted Hadleigh Neighbourhood Plan³. This clearly demonstrates that Neighbourhood Plans can, and in</p>	<p>Comments noted.</p> <p>However it is not proposed to include this as a requirement of the allocated site as it would potentially conflict with the Local Plan requirements.</p>	No change

² <https://www.eastsuffolk.gov.uk/planning/east-suffolk-developers-charter/>

³ <https://www.babergh.gov.uk/web/babergh/w/hadleigh-neighbourhood-plan>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>the opinion of Suffolk Wildlife Trust should, be ambitious in their policy wording for Biodiversity Net Gain.</p> <p>This is further supported by East Suffolk Council, who have published guidance for Neighbourhood Plans⁴ which states that plans should be able to include the ambition for Biodiversity Net Gain to deliver beyond the statutory minimum levels.</p>		
87	Suffolk and North East Essex Integrated Care Board (NOTE: Late response)	Objective SSGN1	<p>Objective SSGN1: SNEE ICB Comment: The ICB has been working closely with East Suffolk Council and Pigeon on the development of the Saxmundham Garden Neighbourhood. East Suffolk Council and SNEE ICB have been engaged in a number Supplementary Planning Documents (SPDs) that will help enhance and protect those principles that will help it become an asset to the town. Colleagues</p>	Noted	No change

⁴ <https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Preparing-a-Neighbourhood-Plan/NP-Guidance-for-Climate-Change-Final-May-2025.pdf>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>from SCC Public Health have also been able to provide expert knowledge to help guide planning principles in the district and make sure that health and wellbeing is integral to all development. Along with this the ICB is in support of the SCLP12.29 and the elements proposed to be included.</p>		
88	Suffolk and North East Essex Integrated Care Board (NOTE: Late response)	Policy SAXGN1	<p>SAXGN1 Connecting the Garden Neighbourhood: Development proposals for the Garden Neighbourhood will be expected to ensure that excellent connectivity, is provided for all users, including those with a mobility impairment, in particular</p> <p>a. between the existing town and the Garden Neighbourhood, b. within the Garden Neighbourhood itself and c. between the residential areas of the Garden Neighbourhood and the proposed employment/commercial areas west of the A12.</p> <p>SNEE ICB Comment: The ICB is supportive of pedestrian and cycle movement being prioritised</p>	Noted	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			over vehicular movement. Ensuring that active travel links are integral to the design of the Garden Neighbourhood will help to provide an environment in which the community can be encouraged to exercise more and not travel via motor vehicle.		
89	Individual 1	Policy SAXGN1	Although I agree with the need for further housing the impact of an additional 800 houses is significant. Concern over lack of capacity in road network especially the cross roads.	Comments noted however the principle of the 800 dwellings was established through the Local Plan	No change
90	Individual 6	Policy SAXGN1	I believe there should be a better connection between the new developments either by coming from Benhall end into town or via mayflower avenue connecting the dwellings	Noted. The policy makes reference to such connections	No change
91	Individual 8	Policy SAXGN1	The options put forward for connecting the garden neighbourhood completely ignore that no matter how many footpaths you install the 800 households will DRIVE to Tesco and Waitrose and therefore need to access the town through Rendham Road and add	The NP acknowledges that there are limitations with access to this site with modes of transport other than the car. The NP tries	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			<p>considerably to traffic congestion.</p> <p>12.21 (p105) argues that the success of the site is dependent on minimising car use and maximising other forms of transport but few will opt to walk or cycle to do a week's shopping. Few will walk to the Health Centre, the distance will be too far to take a sick child or elderly person by foot. You cannot just assume people will use the footpaths and cycle paths.</p> <p>Under SAXGN1 you state that development proposals for the GN will be expected to ensure 'excellent connectivity' but when I attended the Pigeon exhibition the 'traffic' adviser I spoke to didn't even know where Rendham Road is. How is Pigeon and any other possible developer held to account by the Neighbourhood Plan? This is not clear in SAXGN1. The whole approach in SAXGN1 assumes residents will cycle and walk. What happens when they don't?</p>	<p>to minimise private car use where practicable. The Town Council shares the concern in respect to the traffic lights and congestion</p> <p>Noted. The respondent is encouraged to make representations on future Pigeon proposals.</p>	

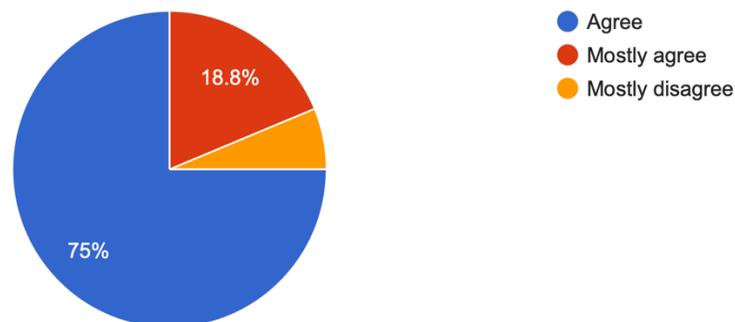
Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			What happens when they ignore public/community buses because their shopping is too heavy to carry onto a bus? Most will DRIVE and SAXGN1 simply does not address how the infrastructure will cope with the additional congestion.		
92	Individual 11	Policy SAXGN1	I think it's a great idea. I support adults with learning disabilities who live on Saxon road and around who would benefit from this.	Noted	No change
93	Individual 13	Policy SAXGN1	As a horse rider in the local area and having had permission to ride some of the footpaths that will fall within the garden neighbourhood I and the other local horse riders would really appreciate it if the proposed footpaths are upgraded to bridleway not cycle path (an easier option according to Sustran). The footpath beside the main road from Benhall and Saxmundham is currently going through the process to be upgraded to a bridleway - long over due to enable a safe cycle route between Saxmundham	Comments noted. The NP supports bridleways for all routes wherever this is practicable	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
			and Benhall. It is safer and easy to cross the railway track by the brick bridge rather than trying to negotiate the level crossings on a horse - this also enables us access one of the rare bridleways the other side of the A12. I have submitted a map to Pigeon Developments with the two footpaths we would really appreciate being upgraded to bridleway and I am happy to share them with you if requested.		
94	Individual 15	Policy SAXGN1	good solutions put forward	Noted	No change
95	Individual 17		I broadly agrees with the designations of the proposed land uses / allocations in Figure 31. It is encouraging to see there is an emphasis in connecting with the existing town through pedestrian footpaths and cycle routes and the designation of the SANG open space. Will have to see how the master plan will develop in more detail with the developer in due course before commenting further.	Support noted	No change

POLICY SAXGN2 and associated chapter

SAXGN2: Green infrastructure

16 responses



Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
96	East Suffolk Council	Green infrastructure paragraphs 12.28/ 12.29/ 12.30/ 12.31	These paragraphs appear to repeat a lot of the earlier commentary on green infrastructure; this should be refined where possible.	Noted. Policy to be reviewed for clarity and brevity	Amend accordingly <input checked="" type="checkbox"/>
97	East Suffolk Council	Paragraph 12.29	The language in this paragraph reads more as policy requirements than supporting text.	Noted. Review for policy inclusion	Amend accordingly <input checked="" type="checkbox"/>
98	East Suffolk Council	Paragraph 12.30	As per earlier comments, reference to Pigeon Proposals should be removed- suggest deleting this paragraph.	Noted. References to be removed	Remove references to Pigeon <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
99	East Suffolk Council	Paragraph 12.31	As per earlier comments, this paragraph could make reference to the Healthy Environments SPD and align with the open space requirements of this.	Include reference to SPD	Amend accordingly <input checked="" type="checkbox"/>
100	East Suffolk Council	Policy SAXGN2	It is not necessary to mention the masterplan process again in the policy when it has already been discussed by previous paragraphs.	Noted . Remove repetition	Amend accordingly <input checked="" type="checkbox"/>
101	East Suffolk Council	Policy SAXGN2	Point ii is not supported due to the poor relationship that buffer zones create. It would undermine the NP's aim of creating an integrated development.	Noted. Agree to remove referee to buffer zone and instead replace with green corridor	Amend accordingly. Remove also last part of sentence <input checked="" type="checkbox"/>
102	East Suffolk Council	Policy SAXGN2	Point iii would benefit from further refinement to ensure that any requirements are clear.	Noted. Review for clarity and use LP wording	Amend accordingly <input checked="" type="checkbox"/>
103	East Suffolk Council	Policy SAXGN2	Point vi needs to ensure that it is consistent with the guidance and language set out in the Healthy Environments SPD.	Review for consistency with SPD	Amend accordingly <input checked="" type="checkbox"/>
104	Suffolk County Council	Policy SAXGN2	Flooding SCC, as the Lead Local Flood Authority, has the responsibility for managing flood risk arising from surface water, ground water and ordinary watercourses. The Environment Agency has the responsibility for managing flood risk from main rivers and the coast.	Amend accordingly	Insert new criterion ix <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>SCC recommends the following amendments based on the areas of change:</p> <p>Policy SAXGN2: SCC suggests adding a new point to the policy: <u>"ix. High-quality SuDS provision should be made across the development that ensures green, open SuDS are provided within residential areas that integrates well into the green infrastructure. SuDS should enhance the amenity and biodiversity of all areas they are integrated, in addition to their functions of volume control and treatment."</u></p>		
105	Suffolk County Council	Policy SAXGN2	<p>Policy SAXGN2: Green Infrastructure It is suggested that the entire area should be embedded into its surroundings through 'green buffer zones', not just along the boundary to existing housing and towards the A12.</p>	<p>Comments noted. The reference to buffer zones will be amended as a consequence of other representations</p>	No change
106	Pigeon Investments (representations made by LDA design)	Policy SAXGN2	<p>SAXGN2: Green Infrastructure Matters referred to in this draft policy are inconsistent with the collaborative work undertaken on the Masterplan Framework Document being produced i.e.</p>	<p>Noted. The reference to buffer zones will be amended as a consequence</p>	No change

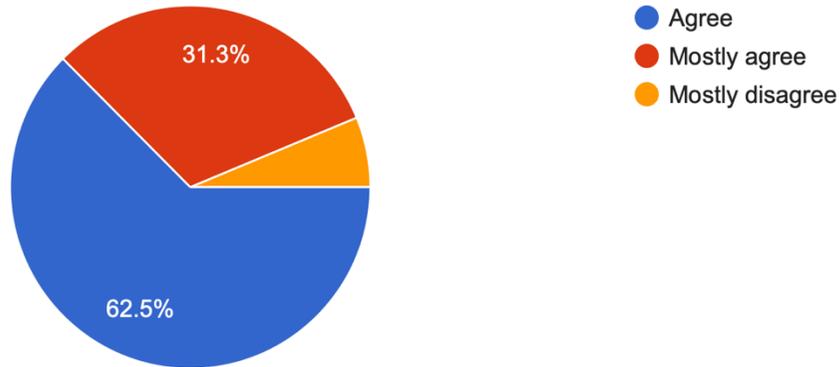
Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<ul style="list-style-type: none"> • A well landscaped green buffer zone along the northern boundary of the Garden Neighbourhood. This could undermine the successful integration of the existing and proposed Garden Neighbourhood. • Significant landscaping along the western boundary of the housing site adjacent to the A12. • New allotments/community gardens. • Provision of green infrastructure to the west of the A12. <p>Early dialogue with STC/NPSG is requested regarding allotments/community gardens, the requirement for landscaped buffers and green infrastructure as these as referenced are not required to bring forward an acceptable South Saxmundham scheme. As such, the policy should be Early dialogue with STC/NPSG is requested regarding allotments/community gardens, the requirement for landscaped buffers and green infrastructure as these as referenced are not required to bring forward an acceptable South Saxmundham scheme. As such, the policy should be appropriately reworded, or the requirements should be omitted for the final version of the Neighbourhood Plan.</p>	<p>of other representations. It is not considered the policy is inconsistent with the Local Plan.</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
107	Individual 8	Policy SAXGN2	While I agree with the importance of a green infrastructure I am unclear how the Neighbourhood Plan will enforce this requirement. Who sits and marries up the developer's plans and the Neighbourhood Plan?	This is the role of the Local Planning Authority – East Suffolk Council	No change
108	Individual 9	Policy SAXGN2	It is essential that we maintain and develop 'green infrastructure' for the future and to insist that biodiversity remains a priority.	Noted	No change
109	Individual 15	Policy SAXGN2	good solutions put forward	Noted	No change
110	Individual 16	Policy SAXGN2	Over provision of preschool facilities	Noted. This is a requirement of the Local Plan and may change over the Plan period with 800 additional dwellings	No change
111	Individual 17	Policy SAXGN2	It is encouraging to see there is emphasis in creating a "green buffer zone" and The Layer is preserved and be assigned as SANG open space.	Noted. The reference to green buffer will be replaced by green corridor	No change

POLICY SAXGN3 and associated chapter

SAXGN3: Community facilities

16 responses



Ref	Respondent	Reference (paragraph or policy number)	Comments	QB Response	Action
112	East Suffolk Council	Paragraph 12.32	The policy requirements for the development are not all community facilities, this paragraph should be re-worded accordingly.	Noted.	Re-word 12.32 <input checked="" type="checkbox"/>
113	East Suffolk Council	Paragraph 12.32	The requirement for the 'local centre' to be located next to the main vehicular entrance to the site contradicts Local Plan Policy SCLP12.29.	Paragraph is to be redrafted as a consequence	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comments	QB Response	Action
				of other representations	
114	East Suffolk Council	Paragraph 12.34	As per earlier comments, remove reference to green buffer.	Noted. See above	No change
115	East Suffolk Council	Paragraph 12.35	This paragraph needs to be removed as it has no planning materiality to it. There is no planning policy which requires there to be 'significant benefits to the community' from development of land outside an allocation and settlement boundaries.	Paragraph 12.35 is to be redrafted to make it clear that the Town Council will be lobbying and pressuring for the delivery of medical facilities and indoor sports	Amend accordingly <input checked="" type="checkbox"/>
116	East Suffolk Council	Policy SAXGN3	This policy does not need to repeat what is already enshrined in the local plan allocation (eg.uses).	It is considered that the policy does add some value to the Local Plan policy. However the wording could be shortened.	Amend accordingly <input checked="" type="checkbox"/>
117	East Suffolk Council	Policy SAXGN3	Remove reference to local centre, the policy looks for a community hub and these should be co-located.	Noted. Agree to remove 'local centre'	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comments	QB Response	Action
118	East Suffolk Council	Policy SAXGN3	As per earlier comments, remove reference to northern landscape buffer.	Noted. See comments above	Amend accordingly <input checked="" type="checkbox"/>
119	East Suffolk Council	Policy SAXGN3	Reference to the indoor sports facility needs to be re-considered as there is no policy requirement for this and therefore the NP cannot insist on this being provided. If reference to indoor sports facilities were to be retained consideration could be given to it being reworded to read: 'Any elements of infrastructure which are additional to that planned for in Policy SCLP12.29 of the East Suffolk Local Plan will be considered, however should be easily accessible from the town and Garden Neighbourhood. Should indoor sports provision be proposed within the Garden Neighbourhood and/or utilising the former secondary school site, this will be welcomed in principle subject to consideration of detail.'	Noted. Agree to amend to refer to 'otherwise' acceptable	Amend accordingly <input checked="" type="checkbox"/>
120	Suffolk County Council	Paragraph 12.33 - 12.34	Paragraph 12.33 - 12.34: Whilst the Neighbourhood Plan may express that there is logic in locating the primary school close to the former secondary school, this may not be the best site for the primary based on any site assessments undertaken as part of the wider Garden Neighbourhood scheme. SCC notes that the secondary school site is embargoed by the Department of Education with the likelihood of being used to deliver SEND provision.	Noted. However in the absence of clarity the NP maintains its position that it is logical to have the two in close proximity.	No change

Ref	Respondent	Reference (paragraph or policy number)	Comments	QB Response	Action
			However, SCC does not know which part of the site will be passed back to SCC, so its suitability is uncertain.		
121	Suffolk County Council	Paragraph 12.35	Paragraph 12.35: Any application to change the use of publicly funded school land for non-educational purposes must be assessed by the Secretary of State (SoS) who considers whether the proposals are justified in the circumstances.	Noted	No change
122	Pigeon Investments (representations made by LDA design)	Policy SAXGN3/4	<p>SAXGN3: Community Facilities</p> <p>Matters raised by this draft policy are inconsistent with the collaborative work undertaken on the Masterplan Framework Document being produced i.e.</p> <ul style="list-style-type: none"> • Paragraph 12.40 says that the site 'currently consists of open fields, woodlands and water elements. These existing qualities of the site need to be preserved and enhanced in the future.' • The aim is for the Garden Neighbourhood to be recognised as a design leader in terms of sustainability, energy efficiency and technological advancement. <p>While most of the existing landscaping will be retained on site, the nature of the proposals is such that the 'open fields' in the main will be built upon and water will be managed to current SuDS guidance standards. The objective of para 12.40 is incompatible</p>	<p>The NP is permitted to add value and detail to the Local Plan policy. However it is recognised that existing features will not be able to be universally preserved and the paragraph can be amended accordingly.</p> <p>The ambition for the Garden</p>	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comments	QB Response	Action
			<p>with the adopted Local Plan proposal for a Garden Neighbourhood.</p> <p>The desire for high quality design is, of course, shared, but the means of achieving this and the extent to which it should be prescribed by planning policy will be clarified by continuing collaborative work.</p> <p>It should also be noted also that the 'proposal for additional indoor sports provision with the Garden Neighbourhood' is not a Local Plan policy requirement. As such, the requirement should be omitted from the final version of the Neighbourhood Plan or possibly expressed purely as an ambition for further investigation.</p>	<p>neighbourhood to be a design leader is to be encouraged.</p> <p>This is an important issue for the community and therefore will remain in the policy.</p>	
123	Pigeon Investments (representations made by LDA design)	Policy SAXGN3	<p>Paragraph 12.32 refers to a 'commercial hub.' This has been dropped, at the request of STC, during the workshops with ESDC.</p> <p>Paragraph 12.34 refers to the 'proximity of the school grounds to the woodland area also gives the opportunity for outdoor school classes during spring and summer periods.' If this is to be achieved, then the uses proposed would need to be consistent with the SANG proposals for this area.</p> <p>Paragraph 12.35 refers to the provision of indoor sports facilities. From the collaborative work undertaken with</p>	<p>Noted</p> <p>Noted. Remove last sentence of 12.34 for clarity</p> <p>Noted</p>	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comments	QB Response	Action
			the NPSG the desire for such facilities is understood. It should be noted, however, that any financial contribution to the provision of such facilities will need to be assessed as part of any overall scheme for South Saxmundham.	Noted	
124	Suffolk and North East Essex Integrated Care Board (NOTE: Late response)	Policy SAXGN3	<p>SAXGN3 Community Facilities: The creation of the new Garden Neighbourhood will be supported by the provision of the following key pieces of community infrastructure.</p> <ul style="list-style-type: none"> • Primary School and associated early years setting • Second early years setting (approx 0.1 hectares) • Local centre/community hub • Recreational facilities including play areas • Proposal for indoor sports provision <p>SNEE ICB Comments: The publication of the 10 year health plan issued on 3rd July 2025 provides a direction of travel to enable a greater shift in improving life expectancy, tackling health inequalities and focus on prevention. Though there are no identified timescales to move to a new model able to provide continuous, accessible and integrated care, work continues. The core components of a new care model will be through 3 main shifts in the models of care provided across the health service.</p> <ul style="list-style-type: none"> o Hospital to community 	Comments noted. It is hoped that clear proposals for health care provision in the town will be provided.	No change

Ref	Respondent	Reference (paragraph or policy number)	Comments	QB Response	Action
			<ul style="list-style-type: none"> o Analogue to digital o Sickness to prevention <p>The focus on prevention will mean that access to appropriate care will be;</p> <ul style="list-style-type: none"> • As local as it can • Digitally enabled • In a person's home/place of residence where possible • In a neighbourhood health centre (NHC) when needed • Only in hospital if necessary <p>This means that along with focusing on having GP practices located in new developments, we will also look to identify opportunities for a more financially sustainable model ensuring a digital first approach and looking more holistically at community and neighbourhood level, utilising our community providers and pharmacies to support the management of long-term conditions, linking them to digital patient records.</p>		
125	Individual 1	Policy SAXGN3	Agree with the need for additional community facilities e.g. health, dentistry, but concern that it might not materialise	Noted. See health response above	No change
126	Individual 8	Policy SAXGN3	Once again Pigeon do not seem to have seriously considered an indoor leisure centre. The town needs it's own swimming pool. This must be a priority. The 'commercial hub' also needs greater emphasis put on	Noted. The priority through consultation has been	No change

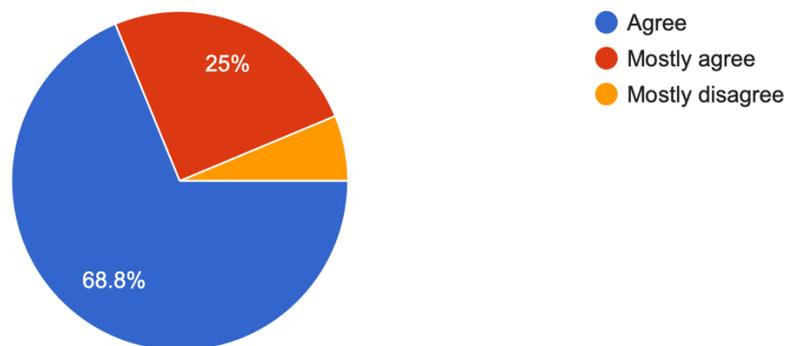
Ref	Respondent	Reference (paragraph or policy number)	Comments	QB Response	Action
			a supermarket such as Aldi or Lidl. In my opinion this will do more for reducing traffic into the town than any cycle or pedestrian route.	indoor leisure in the form of a sports hall rather than a swimming pool	
127	Individual 13	Policy SAXGN3	I'm a resident of Benhall so just outside of Saxmundham. The doctors surgery already cannot cope with the population within its catchment area. How is it supposed to cope with the big increase from the proposed 800 homes? Why is there no doctors surgery on the plan for the garden neighbourhood - I'm hoping it's because Pigeon Developments will be contributing to the suggested Saxmundham Health One Stop Shop.	See health response above. The Local Plan requires a contribution for health facilities	No change
128	Individual 14	Policy SAXGN3	I am concerned that the community doesn't have the appropriate facilities to serve huge numbers of new residents. I already can't use the dentist, find it difficult to get a doctor's appointment - how will provision of new services align with new housing?	See health response above	No change
129	Individual 15	Policy SAXGN3	things deemed important, new community hall, for people to have events, as well as multi -purpose, a 24 hr type gym, and something for youths.	Noted. The NP is seeking to enable the delivery of these much needed facilities	No change
130	Individual 16	Policy SAXGN3	Over provision of preschool facilities	Noted. It is not considered that there will	No change

Ref	Respondent	Reference (paragraph or policy number)	Comments	QB Response	Action
				be an over provision when new developement comes forward	
131	Individual 17	Policy SAXGN3	It is encouraging to see there is emphasis in creating community infrastructures, and that the indoor sports provision / centre will be strongly encouraged.	Noted	No change

POLICY SAXGN4 and associated chapter

SAXGN4: Design of the Garden Neighbourhood

16 responses



Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
132	East Suffolk Council	Policy SAXGN4	This is a very long policy. Considerations should be given to opportunities to break this down into smaller chunks and/or reduce the wording, particularly given the guidance already contained in district-wide documents (Local Plan/ SPDs etc) and the Design Guidelines (which do not need to be repeated).	Noted. Policy to be reviewed for brevity and clarity	Amend accordingly <input checked="" type="checkbox"/>
133	East Suffolk Council	Policy SAXGN4	As per earlier comments, it is questioned how the development can be environmentally connected to the existing town and how that	Environmentally connected means through	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			aligns with the sustainable development principles set out by the NPPF.	landscape, ecologically and townscape connections. These are consistent with the NPPF overarching principles	
134	East Suffolk Council	Policy SAXGN4	It's not accurate to state that the site is visually unconnected to the existing town. There are views of the town from the site, but there is a limited view from the town towards the site.	Noted. Suggest rephrase to say limited visual connections.	Amend accordingly <input checked="" type="checkbox"/>
135	East Suffolk Council	Policy SAXGN4	Generally, the criteria in this part of the policy would benefit from being refined to those elements where an influence can genuinely be gained in order to ensure their impact.	Noted	No change
136	East Suffolk Council	Policy SAXGN4	Criteria 7. Suggest the following amendment to this wording 'Cul-de-sacs should be avoided, but if proposed, these should be connected to the footpath network in the area through filtered permeability.'	Amend accordingly	Amend SAXGN4 criteria 7 <input checked="" type="checkbox"/>
137	East Suffolk Council	Policy SAXGN4	Criteria 8. Suggest the following wording instead: 'When a street is proposed adjacent to the countryside or a large open space, a sensitive landscape scheme should be developed to enable a suitable transition.'	Amend accordingly	Amend criterion 8 <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
138	East Suffolk Council	Policy SAXGN4	Criteria 10. This point should be re-worded to also allow for rear parking courts. Suggested wording: 'Residential parking should either be provided on plot to the side of dwellings or as rear parking courts. Convenient Electric Vehicle charging points should be provided to all parking spaces. Garages should be sized in accordance with the Suffolk Parking Standards.'	Agree to amend however the presence is for parking to be provided on plot and to the side with rear parking courts as a lesser preference	Amend criterion 10 <input checked="" type="checkbox"/>
139	East Suffolk Council	Policy SAXGN4	Criteria 11. Suggested wording to quantify this, 'Car parking design should be broken up by meaningful landscaping a minimum of every 4th parking space to minimise the presence of vehicles.'	Amend accordingly	Amend criterion 11 <input checked="" type="checkbox"/>
140	East Suffolk Council	Policy SAXGN4	Criteria 12. Suggested wording to add to this point: 'Parking should be placed in well overlooked areas. Where rear parking courts are proposed, these should be secure and active frontage provided where possible. Flats Over Garages (FOGS) is one way in which this could be achieved. Parking should not dominate the street scene.'	Amend accordingly	Amend criterion 11 <input checked="" type="checkbox"/>
141	East Suffolk Council	Policy SAXGN4	Criteria 19. Sensitive lighting schemes are also important for protecting biodiversity such as migrating birds and foraging and roosting bats. The Institute of Lighting Professionals and Bat Conservation Trust Guidance Note 08/23 - Bats	Amend accordingly	Amend criterion 19 to include reference <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			and Artificial Lighting at Night is where guidelines for artificial lighting for bats can be found.		
142	East Suffolk Council	Policy SAXGN4	Criteria 20. Reference to specific noise mitigation should be provided as a number of these would have negative impacts on the quality of the development. Suggest that reference is also added to require that where apartments are provided in areas at risk from noise impact, the apartments are dual-aspect.	Amend accordingly	Amend criterion 20 <input checked="" type="checkbox"/>
143	East Suffolk Council	Policy SAXGN4	Criteria 21. As above, suggest reference is added to require that where apartments are provided in areas at risk from noise impact, the apartments are dual-aspect.	Amend accordingly	Amend criterion 21 <input checked="" type="checkbox"/>
144	East Suffolk Council	Policy SAXGN4	Criteria 22. Reference to building lines should be taken out as this will vary according to character areas. Some character areas may want greater variance than others.	Agree that these will vary according to character areas	Amend accordingly <input checked="" type="checkbox"/>
145	East Suffolk Council	Policy SAXGN4	Criteria 23. Active frontage is only truly achieved through habitable ground floor windows, this point should be amended accordingly.	Amend accordingly	Amend criterion 23 <input checked="" type="checkbox"/>
146	East Suffolk Council	Policy SAXGN4	Criteria 24. Agree that buildings should avoid pastiche design but there are contemporary examples of chimneys which are successful and so reference to this specific point should be taken out.	Agree to remove reference to chimneys	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
147	East Suffolk Council	Policy SAXGN4	Criteria 25. Appears to repeat point 23, these two points should be amalgamated. Reference to the windows being of a sufficient size to allow in light should also be taken out as this may conflict with managing solar gains.	Agree to merge	Merge criterion 23 and 25☑
148	East Suffolk Council	Policy SAXGN4	Criteria 29. Consideration may also want to be given to selecting materials which have less embodied carbon so that the materials are more sustainable.	Amend accordingly	Amend criterion 29☑
149	East Suffolk Council	Policy SAXGN4	Criteria 31. Not clear what is meant by eco design features. Suggest that the NP looks to set the standard of BREEAM that the employment buildings should achieve.	Noted. This could be explained	Add explanation to Criterion 31☑
150	East Suffolk Council	Policy SAXGN4	Criteria 32. Remove requirement for development to be Passivhaus. Instead, reference could be made to developments consider the use of Passivhaus design. Flexibility should be given for the developer to come forward with their own solutions to reducing energy consumption upon occupation and solar conversion materials should not be specifically required. Satellite dishes are not required as frequently as previously needed due to the increased popularity of streaming services and therefore it is not proportionate for them to be included at the design stage – the permitted development rights for satellites could instead be suggested to be removed for front	Agree this is over prescriptive	Amend accordingly☑

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			elevations if justified, but generally this would be exceptional.		
151	East Suffolk Council	Policy SAXGN4	Criteria 33. This point could ask that developers provide a commitment to the operational targets of the new homes which should be consistent with the LETI Climate Emergency Design Guide .	Amend accordingly	Amend criterion 33 to include reference <input checked="" type="checkbox"/>
152	East Suffolk Council	Policy SAXGN4	Criteria 34. This point should be that buildings are orientated and designed to manage solar gain as opposed to maximise. This then helps to avoid overheating	Amend accordingly	Amend criterion 34 <input checked="" type="checkbox"/>
153	East Suffolk Council	Policy SAXGN4	Criteria 38. We think the intention of this point is for the density to be sensitive to Saxmundham but to equally respond to its context (e.g. the rural edge). It may be better to amend the wording to allow for toleration of subtle differences to density but which are generally in keeping with the wider context.	Agree reference should be to Saxmundham	Amend criterion 38 <input checked="" type="checkbox"/>
154	East Suffolk Council	Policy SAXGN4	Criteria 39. Consideration should be given to bin drag distances, SCC highways will be able to advise on this point.	Noted ESC has provided additional detail	Amend accordingly <input checked="" type="checkbox"/>
155	Suffolk County Council	Policy SAXGN4	Policy SAXGN4: It is suggested to amending points 3, 8 and 13 with following additions:	Agree to amend accordingly	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>"3. Green verges should be provided along the main street with large street trees to provide shading and create a 'garden' neighbourhood feel. <u>These verges should also be integrated into the SuDS strategy to provide multifunctional benefits.</u>"</p> <p>AND</p> <p>"8. [...] Such buffers should also be used for swales, raingardens, <u>and small attenuation features to contribute to a high-quality SuDS provision to address any flooding issues.</u>"</p> <p>AND</p> <p>"13. Parking areas and driveways should be designed to minimise water run off through the use of <u>raingardens, treepits, and permeable paving.</u>"</p>		
156	Suffolk County Council	Policy SAXGN4	<p>SCC Public Health recommends that Policy SAXGN4 include an additional point under the heading "BUILT FORM AND BUILDING DESIGN", with the following wording: <u>30. Support will be given to the provision of housing that meets identified local needs within the Neighbourhood Plan area, including homes that are adaptable and accessible (i.e. built to optional M4(2) standards), in order to support</u></p>	This point is covered by Local Plan policy.	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p><i>an ageing population while also addressing the needs of younger residents and families. Proposals that meet or exceed the requirements set out in the Local Plan will be particularly encouraged.</i></p> <p>The Employment Area 31 30. The Employment Area [...]" _</p>		
157	Suffolk County Council	Policy SAXGN4	<p>Policy SAXGN4: Design of the Garden Neighbourhood Regarding point 5, private gardens should not be relied upon to provide additional amenity in the public realm. It would require strict covenants to enforce a certain type of front garden, and thus this point should be revised.</p> <p>Regarding point 9, again, these hedges would need to be outside private garden land to be effective and enforceable.</p> <p>Regarding points 16 to 18, under "Landscaping and tree planting", greater emphasis should be placed on the provision of mixed native hedges</p>	<p>Comments noted.</p> <p>It is not the intention for this to be part of the public realm it is more an attempt to provide a green, open feel to the wider development.</p> <p>Amend accordingly</p>	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>to form well connected green corridors. It is noted that point 16 is very restricting and would be difficult to implement. Planting in private gardens as stated in Point 17 cannot be relied upon to provide amenity in the public realm. While ornamental plants should not be excluded from the palette, their promotion should be reconsidered. It may be more useful to consider ornamental plants as part of the 'garden city' concept, but it is equally important to bring the surrounding countryside and locally typical native species into the design to provide a seamless transition.</p> <p>Point 19 under "Lighting" could be stronger and request that lighting and light levels are minimised, and that the lighting is a 3000K or below (i.e. on the warmer spectrum of light, while delivering the same illumination).</p>	<p>Amend accordingly</p> <p>Amend accordingly</p>	
158	Pigeon Investments (representations made by LDA design)	Policy SAXGN4	<p>SAXGN4: Design of the Garden Neighbourhood</p> <p>Generally, the matters referred to are very detailed and none of the draft SAXGN4 wording is appropriate to be included in planning policy. It is also unclear at this stage how many of these objectives would be achieved, or indeed what actions or standards would constitute achieving</p>	<p>Noted. However NPs are permitted to add detail to existing policy at a much localised level.</p>	<p>Amend to remove Masterplan references <input checked="" type="checkbox"/></p>

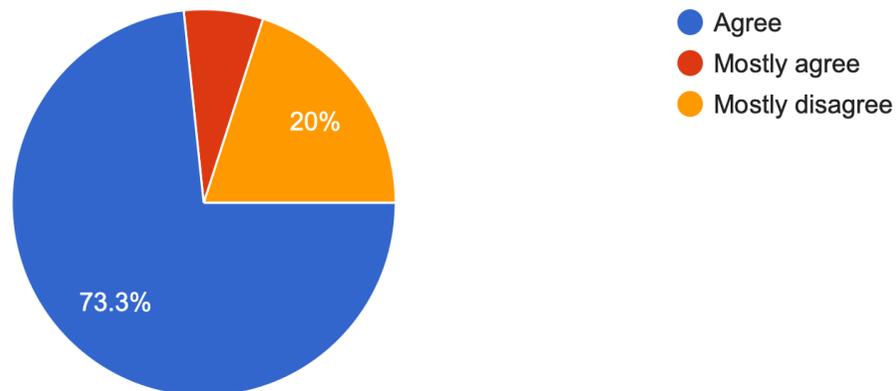
Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>them. Some of them are undoubtedly worthy ambitions but as such should only be referred to in lower case commentary.</p> <p>Furthermore, specifically it is not agreed that 'the site is unconnected visually to the town'. There are several locations where there are through views from the edge of the existing built-up area into the Garden Neighbourhood site. To depict the two areas as visually separate is inaccurate.</p> <p>The reference to the previous Design Guidelines should be removed from any policy. It is possible new and more appropriate guidelines could form a new appendix, but these will be identified during the continuing collaborative engagement process.</p> <p>It is also not agreed as described in Layout 1) that the development should be designed as a series of neighbourhoods. It is one integrated neighbourhood, and it is confusing to suggest it should be a series. There may be 'character areas' identified, and this will occur through the continuing collaborative engagement process.</p>	<p>Noted see ESC comments above</p> <p>The Design Guidance and Codes which are part of the Adopted NP will remain. Reference to AECOM Masterplan work will be removed.</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
159	Pigeon Investments (representations made by LDA design)	Policy SAXGN4	Paragraph 16.3 (Actions/Statements of Intent by Saxmundham Town Council) references 'iii. Support the establishment of The Layers and the land to the east of the railway as a public open space/country park/SANG (Suitable Alternative Natural Green Space) as included in the ESC Local Plan, for use by the whole community, and (through the natural greening of the whole site) work towards increasing its biodiversity.' Notwithstanding that this appears inconsistent with other statements made within this emerging Neighbourhood Plan, it should be noted that Local Plan policy is quite clear in that 'The Layers' can remain in agricultural use. (X-ref comment made on para 12.29).	Noted Agree that reference in 16.3 iii) should also refer to the Local Plan wording.	Amend 16.3 iii <input checked="" type="checkbox"/>
160	Individual 9	Policy SAXGN4	It would be helpful to have an indication of the type of homes to be built and ensure that 'affordable' means just that for people on limited income.	Noted. The definition of affordable housing is in Annex 2 of the NPPF . It will be ESC who determine the precise mix.	No change
161	Individual 15	Policy SAXGN4	the detail could be expanded - the overall doc is exceptionally well structured and considered	Support noted	No change
162	Individual 17	Policy SAXGN4	It is encouraging to see there is emphasis in having a high quality, well designed, distinctive development	Support noted	No change

POLICY SAXEN1 and associated chapter

SAXEN1: Addressing and mitigating the impacts of large scale energy projects

15 responses



Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
163	East Suffolk Council	Chapter 13. Mitigating the impacts of National Infrastructure and Energy	This section might benefit from some additional text explaining ESC's efforts to mitigate the impacts from multiple NSIP projects. The precise wording will be for the NP group to consider, but we would suggest the following:	Comments noted. However this is more a statement of intent by ESC and it is not	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
		Projects on Saxmundham	<p>'Through the various stages of NSIP consultations, East Suffolk Council (ESC) is highlighting the need for cumulative impacts to be considered by both developers and the Planning Inspectorate. ESC is striving to achieve appropriate noise levels during the construction and operational phases of developments which minimise impacts on surrounding land users as far as is practicably possible.</p> <p>Similarly, the methodologies being proposed during construction phases have been scrutinised by ESC to ensure disturbance from vibration and air quality issues, including emissions from construction vehicles and dust, are sufficiently reduced.</p> <p>ESC is also emphasising the importance of coordinating multiple NSIPs where possible to increase efficiencies and reduce the overall impacts on local residents and the environment.'</p>	appropriate wording for the Saxmundham NP	
164	Suffolk County Council	Chapter 13	<p>Chapter 13 – Mitigating the impacts of National Infrastructure and Energy Projects on Saxmundham</p> <p>It is welcome that the historic environment has been included in Policy SAXEN1. Regarding the impact of NSIPs and energy projects on the historic environment including below-ground</p>	Support noted	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			heritage, archaeology is a key issue and is being dealt with through the DCO process.		
165	Suffolk County Council	Paragraph 13.21	<p>Paragraph 13.21 The second bullet point which states " • increased stormwater run-off with vast areas of previously permeable landscape becoming covered with impermeable surfaces"</p> <p>SCC notes the existing soil types are mostly clays, which are not overly permeable so it is important to approach statements like this with caution. All infrastructure is required to mitigate increased runoff within the site area to ensure there is no increase in offsite flood risk. This paragraph reads as if the proposals will increase flood risk and therefore should be revised.</p>	Comments noted. The wording in this section is to be recast as a result of other representations	No change
166	Suffolk County Council	Paragraph 13.23	<p>Paragraph 13.23 The following amendments are suggested:</p> <p>"Development will be expected to manage all <u>surface water runoff from water running</u> impermeable surfaces through rainwater harvesting solutions, attenuation ponds, swales, <u>tree pits, raingardens and bio retention basins</u> as appropriate <u>and in accordance with LLFA requirements</u>. Where new roads (even temporary roads) are to be constructed these should establish swales and bioretention basins along all new roads to capture and treat water</p>	Comments noted. The policy is to be re-written as a consequence of other representations and therefore the supporting text may also change. If this text is retained it will be	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			runoff to reduce flood risk and mitigate risk of pollution to the Rover Fromus."	amended accordingly	
167	East Suffolk Council	Paragraph 13.13	In addition to the bullet points here, we would suggest adding: <ul style="list-style-type: none"> • Noise (construction and operational phases) • Vibration (construction phase only) • Dust (construction phase only) 	Noted Amend accordingly	Amend accordingly <input checked="" type="checkbox"/>
168	Suffolk County Council	Policy SAXEN1	SAXEN1: Addressing and mitigating the impacts of large-scale energy projects SCC supports this policy in principle. However, it is unclear if 10% BNG can be 'applied' and would consider that, at least for the time being, this may depend on policies of the promoters. The government recently undertook a consultation on BNG for NSIPs ⁵	Noted. Agree to amend accordingly	Amend accordingly <input checked="" type="checkbox"/>
169		Policy SAXEN1	National Significant Infrastructure Projects <i>Supporting Text for Policy SAXEN1:</i> SCC disagrees with the statement made in paragraph 13.2 that "there is a limit to the weight that can be given to adopted development plan policies such as the Local Plan or Neighbourhood Plan". Although decisions in regard to the determination of planning permission for NSIPs are made by the relevant Secretary of State (SoS), the SoS must have	Comments noted. Text to be amended to reflect this.	Amend accordingly <input checked="" type="checkbox"/> New map required

⁵ <https://www.gov.uk/government/consultations/biodiversity-net-gain-for-nationally-significant-infrastructure-projects>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>regard to any Local Impact Report (LIR) submitted when deciding the application. SCC and ESC will each (or jointly) produce a Local Impact Report on each NSIP in their administrative boundaries. As per the Planning Inspectorate's advice note for Local Authorities⁴, the LIR is expected to contain (amongst other matters) an appraisal of the project's compliance with all relevant local planning policy and guidance. Once adopted, a Neighbourhood Plan forms part of the local development plan and will thus be included in this appraisal.</p> <p>Concerning paragraph 13.3, SCC would caution against using the phrase "to mitigate the impact" in regard to community benefits. As a result of a supreme court decision in 2019⁵, community benefits must not be considered when determining whether to grant planning permission, and as such they must be in addition to any compensation and mitigation measures that are embedded in the project to account for disturbance or other adverse impacts. Whilst it is currently voluntary for developers to provide community benefits, SCC promotes that the provision of community benefits should be offered in recognition of the host communities vital role in hosting the national infrastructure.</p>	Noted. Amend accordingly	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>SCC will work with ESC and affected Town and Parish Councils to ensure that developers provide a tailored community benefit offering that meets the needs and wants of the communities affected.</p> <p>SCC notes that Figure 38 is labelled as an "Overview Map: Energy Infrastructure Projects in East Suffolk", however, this map only shows the Sea Link proposals. SCC advises that the title could be changed to read:</p> <p><i>"Overview Map: Sea Link Multi-Purpose Interconnector proposals Energy Infrastructure Projects in East Suffolk as of November 2024. Source: National Grid."</i></p> <p>This would ensure accuracy of the content shown. SCC has published an Interactive Map of Suffolk NSIPs which can be located on our website, under 'Major Infrastructure Projects, including NSIPs⁶ and then clicking on the Green button. Here, you can identify the Sea Link proposals and other cumulative impacts presented by the co-location of infrastructure projects. Please note, as indicated on the disclaimer, that the content of any material</p>	<p>Amend figure 38 title accordingly</p>	

⁶ <https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			created by Suffolk County Council may not be copied, reproduced, republished, or transmitted in any way without first obtaining our written permission.		
170	Suffolk County Council	Paragraph 12.17 and paragraph 3.19	<p>Paragraph 13.17 mentions the principles of the mitigation hierarchy. To ensure certainty of the definition, SCC suggests that the Neighbourhood Plan could include reference to the glossary definition held within the 'Overarching National Policy Statement for Energy (EN-1)'7.</p> <p>Concerning paragraph 13.19, SCC would again advise caution regarding community benefits as previously noted in comments on paragraph 13.3. Community benefits must be in addition to any compensation and mitigation necessary to proportionately address adverse impacts. It is in the benefit of the Neighbourhood Plan to recognise that community benefits are additional to compensation and mitigation but noting that they are expected to be offered where an NSIP is located within the Neighbourhood Plan area. SCC also suggests that the Neighbourhood Plan could serve as a vehicle to advise developers of the potential opportunities that the communities would seek from a community benefit fund, or whether shared ownership would be a preferable model for the local community.</p>	<p>Noted</p> <p>Amend glossary to include definition</p> <p>Agree to amend accordingly – community benefits sought but not contingent</p>	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
171	Suffolk County Council	Policy SAXEN1	<p>SCC strongly supports the principles of Policy SAXEN1.</p> <p>SCC welcomes and supports the aspirations of the Specific Mitigations for Saxmundham.</p>	Support welcomed	No change
172	Suffolk Wildlife Trust (NOTE: Late response)	Objective EN1	<p>Proposed changes to Area Wide Objectives</p> <p>EN1 The objective could be amended to include the biodiversity impacts within the plan area alongside physical, visual, and social impacts. While there is a statutory requirement for biodiversity impacts to be addressed, including specific consideration for impacts within the plan area could also help biodiversity at a local level.</p>	<p>Noted</p> <p>Amend accordingly</p>	Amend EN1 <input checked="" type="checkbox"/>
173	Suffolk Wildlife Trust (NOTE: Late response)	Policy SAXEN1	<p>Mitigating the impacts of National Infrastructure and Energy Projects on Saxmundham</p> <p>Suffolk Wildlife Trust engage strategically with all Nationally Significant Infrastructure Projects (NSIPs) in Suffolk, looking to advocate for the best possible outcomes for nature while acknowledging the need for renewable energy and a net zero grid.</p> <p>The scale of mitigation and compensation for NSIPs is significant and should be carefully considered. Mitigation and compensation should be delivered in such a way as to contribute to</p>	Support noted	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			wide-scale gains for biodiversity, delivering mitigation which buffers and connects existing sites of value to nature (ie, delivery of the Lawton Principles ⁷ - "bigger, better, more joined up"). Suffolk Wildlife Trust support the concept of including benefits to biodiversity and nature recovery as part of any mitigation which is delivered within the Saxmundham Neighbourhood Plan area.		
174	Suffolk and North East Essex Integrated Care Board (NOTE: Late response)	Policy SAXEN1	<p>SAXEN1 Addressing and mitigating the impacts of large scale energy projects: To ensure that the necessary measures required to mitigate the physical, visual and social impacts of National Infrastructure and Energy Projects on Saxmundham are identified and implemented.</p> <p>SNEE ICB Comments: The ICB has been involved from the very beginning of the various NSIPs in the area. We were part of a working group with colleagues from Suffolk County Council and other key stakeholders on the Sizewell C project. As a result of this work a role has been created to overview the impact of the Sizewell C project on health. The ICB has been involved in numerous meetings to discuss health impacts and wider determinants of health impacted by North Falls and Five Estuaries offshore projects. We continue</p>	Noted	No change

⁷ <https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>to work with project teams, The NSIP Centre of Excellence and district councils on NSIPs and assuring that health and wellbeing are integral to the lasting legacy of the projects.</p> <p>As a statutory consultee the ICB is working with Public Health colleagues in capturing the impacts of NSIPs and mitigating through s106 and other methods available. The collective work will help to provide assurances that the cumulative impacts of multiple NSIPs in area is taken into account and mitigated through local community schemes where possible. Whilst NSIPs can be seen to be problematic and have a negative impact on an area, it should be recognised that colleagues in the ICB are involved in identifying how and where to utilise Community Benefit Agreements associated with the North Falls and Five Estuaries projects. Developers may enter into Community Benefit Agreements with local authorities, which could include provisions for local employment. Local authorities and key stakeholders can work with developers and training providers to ensure local residents have the skills needed for jobs created by NSIPs.</p>		
175	Individual 8	Policy SAXEN1	The cumulative impact of these projects must not be ignored or underestimated. It feels like we are being treated with contempt by these	Noted	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			National energy projects. We are one small market town being beseiged and our objections and voices are like David v Goliath.		
176	Individual 9	Policy SAXEN1	It is clear that a lot of thought has gone into ways in which the infrastructure projects can support Saxmundham in ensuring that the opportunities are not overlooked.	Noted	No change
177	Individual 15	Policy SAXEN1	A plan B is a necessity, but against these NIP's at Friston and at the top of Saxmundham. projects is	Noted	No change
178	Individual 17	Policy SAXEN1	I have significant concerns regarding the recently published Empowering Nature document. While I fully support initiatives that enhance and protect our natural environment, I believe certain elements of the document are premature, potentially misleading, and risk understating the scale and impact of the energy infrastructure developments proposed for Saxmundham. By embedding the proposed mitigation measures within the neighbourhood plan, there is a real danger that the town could be perceived as accepting these projects, inadvertently strengthening the developers' position.	Comments noted. The Empowering Nature document has not be included as it is not a planning matter. Howev the NP is permitted to deal with long terms planning matters	No change
179	Individual 18	Policy SAXEN1	I support the goal for protecting our natural environment however parts of the empowering nature vision seem fanciful and misrepresent the reality of scale and harm the proposed energy infrastructure will have on Saxmundham.	The point is acknowledged however not making reference to	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			Including mitigation measures in the neighbourhood plan risk sending the wrong message to the developers, who will ultimately do the least requirements and cheapest measures. Wouldn't substantial compensation to the communities that host these development be requested and best used- ie: works to improve the high street / traffic calming measures as well as improving the natural environment.	mitigations in the event of approval does not mean the policy considers scheme is acceptable	
180	Individual 19	Policy SAXEN1	<p>Although I have been involved in the modification process throughout, as a member of the NP Steering group and town Councillor, I am here writing in a personal capacity. Hitherto, my attention has mainly been directed to the Garden Neighbourhood proposals.</p> <p>I have however recently looked in detail at the new draft policy SAXEN1 "Addressing and mitigating the impacts of large scale energy projects". While recognising the limitations on the policy we are able to put forward for NSIPs, I feel the current text is a bit ambiguous in part, and inadequate in coverage of the issues of mitigation. I am of course aware of ESC's and the Town Council's limited remit in relation to NSIPs.</p> <p>The current wording of the 2nd paragraph states:</p>	The policy wording is to be recast as a result of a number of representations. The points may be addressed by the reworded policy	<p>Policy to be reworded <input checked="" type="checkbox"/></p> <p>Amend policy to remove 13.9 and heading <input checked="" type="checkbox"/></p>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>"Where mitigatory or compensatory measures are identified which are considered necessary to remedy the permanent or long-term impacts of major energy schemes on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, these should be provided in the first instance <u>directly in the parish where those impacts are most felt</u> . Only if this is not possible or practicable should they be provided <u>elsewhere in the parish</u>. Where such mitigations are required in respect of biodiversity, the standard biodiversity net gain metric of 10% should be applied."</p> <p>The underlines passages are my doing - I think the intention is that the first bit should mean the following:</p> <p>"..directly in <u>those parts of</u> the parish where the impacts are most felt".</p> <p>I propose to rewrite the following sentence as follows (including deleting the first word, "Only"):</p> <p>"If this is not possible or practicable, they should be provided elsewhere in the parish."</p>		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>However, I propose the paragraph needs a stronger starting point, e.g. by including a new first sentence along the following lines:</p> <p>"Where significantly adverse permanent or long-term impacts of major energy schemes are identified, e.g. on the landscape, natural environment, wildlife and nature recovery, historic environment or the residential amenity for the parish, appropriate measures of local mitigation and/or compensation should be sought."</p> <p>The current draft policy does not even indicatively identify the types of mitigation that are referred to in the text. I propose that they should be, but including some points not yet in the text but which are significant (protecting nearby residential neighbourhoods, protecting the town centre). I propose therefore that a final paragraph be added to the policy, along the following lines:</p> <p>"Such mitigatory measures may in particular include those for the purpose of:</p> <ul style="list-style-type: none"> • Protecting nearby residential neighbourhoods, so far as practicable, 		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>from noise or other disturbance or deleterious effects</p> <ul style="list-style-type: none"> • Mitigating the visual and biodiversity impacts of the Converter station(s) • Mitigating any increase in floodrisk or pollution to the River Fromus • Mitigating the adverse impacts on biodiversity • Mitigating the adverse impacts on the town centre from NSIP-related traffic" <p>My last point is a query. On page 129, the page before the current Policy, we find the following (which is wording I had earlier suggested, but as part of the formal policy):</p> <p>"Policy SAXEN1 Addressing and mitigating the impacts of large scale energy projects 13.19 In relation to Proposals for Nationally Significant Infrastructure Projects that may be located in Saxmundham, or impact directly upon the parish, proposals or options for appropriate mitigation measures and/or significant local community benefits, to proportionately address negative impacts of such developments (including cumulative impacts) on the Neighbourhood Plan area or any part thereof, will be recommended to the promoter and/or other relevant authorities or</p>		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>bodies, in accordance (among other matters) with the policies and strategies set out in this Neighbourhood Plan, and in furtherance of Local Plan policy SCLP3.4".</p> <p>Was this intended to be a part of the policy (given the heading which is identical)? Is there a reason why this (or similar) should not be an integral part of the policy? I note that SCLP3.4 refers to ESC's role as consultee on NSIPs, on which it has no decision-making powers: " In its role either as determining authority for development under the Town and Country Planning Act, or as consultee on Nationally Significant Infrastructure Projects, the Council will take into consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime..."</p>		

**POLICY SAX1 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
181	East Suffolk Council	Paragraph 6.12	Minor typo- additional ',' at end of para.	Noted	Amend accordingly <input checked="" type="checkbox"/>
182	Pigeon Investments (representations made by LDA design)	Policy SAX1	SAX1 General Design Principles A x-reference should be made here which takes on board Pigeon's comments made regarding draft Policy SAXGN4. Continuing collaborative discussions are proceeding and will result in new Design Guidelines and Codes for the Garden Neighbourhood. Thus, it is not necessary to refer to past (and now out of date) AECOM work as future scheme proposals will be required to comply with the Master Plan Framework Document and any accompanying design guidance submitted in support of an application for the South Saxmundham scheme.	Noted Remove reference to AECOM Masterplan But the Design Code which is part of the Adopted Neighbourhood Plan is to remain.	Amend accordingly <input checked="" type="checkbox"/>
183	Individual 15	Policy SAX1	okay	Noted	No change
184	Individual 18	Policy SAX1	I support all design principles.	Support noted	No change

**POLICY SAX2 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
185	Individual 1	Policy SAX2	Agree with extending Carlton Industrial Estate	Noted.	No change
186	Individual 8	Policy SAX2	There is a serious lack of diversity in the High Street. The town has become a centre for estate agents, hairdressers and beauty shops. The High Street looks tired and is uninteresting. It compares very badly with the range of shops in Aldeburgh and Woodbridge. Saxmundham High Street has no identity. It tries to be an art destination, but fails.	Comments noted.	No change
187	Individual 15	Policy SAX2	okay	Noted	No change
188	Individual 18	Policy SAX2	I support the policy: Expansion of existing businesses	Support noted	No change

**POLICY SAX3 and associated chapter
(note, small amendment in last paragraph)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
189	Pigeon Investments (representations made by LDA design)	Policy SAX3	<p>SAX3: New Businesses</p> <p>Considering the Town Council's support for new and varied employment to be delivered at Saxmundham, it is recommended that a further category be added to this policy, as follows: g) The provision of roadside services adjacent to the A12 to meet the needs of visitors to and those travelling through the Saxmundham area</p>	Comments noted. It is not considered necessary to include something this specific in the policy.	No change
190	Individual 8	Policy SAX3	<p>The Neighbourhood Plan should rethink what types of retail the town needs in a and b of SAX3. We definitely do not need any more hairdressers, estate agents, barbers and nail bars.</p>	Comments noted. However many of the uses quoted fall into the same use class in terms of planning use and therefore there is little control over the move between uses.	No change

191	Individual 15	Policy SAX3	okay	Noted	No change
192	Individual 18	Policy SAX3	I support the policy: New businesses	Support noted	No change

**POLICY SAX4 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
193	East Suffolk Council	Paragraph 8.9-8.12	We welcome the inclusion of high-level priorities for the spending of neighbourhood CIL. It would be helpful to include further detail on these spending priorities and any specific projects that have been identified, including costings. This could be provided as a separate appendix to the NP.	Noted. However this section is not identified for modification at this time and is not a Basic Condition issue. However the Town Council would welcome discussion with East Suffolk at an appropriate poitn in time in respect of the use of Neighbourhood CIL for indoor	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
				sports and leisure use.	
194	Pigeon Investments (representations made by LDA design)	Policy SAX4	SAX4: New community facilities Pigeon supports the Neighbourhood Plan's ambition to provide indoor sport and leisure provision within the town, but it should be noted this is not a requirement of the South Saxmundham Garden Neighbourhood as set out in the Adopted Suffolk Coastal Local Plan Policy SCLP12.29.	Noted. See response 198 below.	No change
195	Suffolk and North East Essex Integrated Care Board (NOTE: Late response)	Paragraph 8.11	Community Infrastructure Levy (CIL) 8.11 Community consultation undertaken as part of the Neighbourhood Plan process identified the following priorities in respect of community facilities: The ICB recognises that the consultation identifies that health facilities are regarded as the most important community facility in terms of priorities for the people of Saxmundham. Work is progressing with the surgery and project leads on finding a new site for the health centre. A number of locations have been assessed and options are being considered for the most appropriate way forward. We would welcome the addition of a simple statement, to confirm that Saxmundham Parish Council will support Suffolk and North East Essex ICB in ensuring suitable and sustainable provision of	Noted An update can be included I the supporting text as appropriate	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			healthcare services for the residents of Saxmundham.		
196	Individual 8	Policy SAX4	The most important new facility needed is a leisure centre. We need our own pool and gym. I currently travel to use Leiston and Woodbridge Pools. The use of these centres for swimming, aquafit and the gym is a daily priority in my life and makes a significant contribution to maintaining and improving my health now that I am retired. Both Leiston and Woodbridge leisure centres are well used by their local communities and it is shameful that Saxmundham does not have its own leisure centre.	Comments noted. The NP recognises the importance of this issue	No change
197	Individual 15	Policy SAX4	things deemed important, new community hall, for people to have events, as well as multi purpose use, plus a 24 hr type gym, and something for youths.	Noted. See above	No change

**POLICY SAX5 and associated chapter
(some text moved to new policy SAXGN1)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
198	Individual 8	SAX5	I have no faith in a policy that simply does not address the congested road infrastructure of the town.	Noted. The NP includes a specific section on the Town Centre at SAXTC1	No change
199	Individual 15	SAX5	okay	Noted	No change
200	Individual 18	SAX5	I support the policy: Improving connectivity	Support noted	No change

**POLICY SAX6 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
201	Suffolk County Council	Policy SAX6	Public Rights of Way (PRoW) The new additions to the Neighbourhood Plan are broadly acceptable to SCC PRoW.	Noted. It was not the intention to amend this policy	Amend accordingly <input checked="" type="checkbox"/>

			<p>It is welcome to see reference to the Green Access Strategy and the NPPF with regards to PRoW.</p> <p>Policy SAX6: The creation or upgrade of PRoWs requires order making and criteria being met to ensure safety of users. It is suggested that the following phrasing is added to the second paragraph: "Proposals should seek to minimise light pollution whilst remaining safe and attractive to users, <i>and in agreement with LHA Highways (PRoW) and to meet current specifications for all user types</i>".</p> <p>The rights of way network could be developed for different users. This should include people with limited mobility, people using pushchairs or in wheelchairs, and cyclists and horse riders. The latter is omitted in most documents, and it should be noted that that bridleways can also be used and enjoyed by horses.</p> <p>Also, this plan could be further developed by including the development of promotional material that raises awareness of rights of way and circular walks, the history and heritage of the parish, and biodiversity to raise awareness, understanding and appreciation of these aspects. More information about Public Rights of Way can be found on our website⁸.</p>	<p>however the suggested paragraph about lighting could be included.</p> <p>The policy currently refers to 'all users' and therefore does not need to make the specific reference</p> <p>This is not a function of an NP</p>	
202	William Notcutt Estates (representations	Policy SAX6	SAX6: Public Rights of Way We previously objected to the requirement for existing Public Rights of Way to be enhanced as the SNDP has	Comments noted. However	No change

⁸ <https://www.suffolk.gov.uk/roads-and-transport/public-rights-of-way-in-suffolk?nodeId=c9ea6443-1c5e-5795-9b88-b3510e9d543f&entryId=f43da10c-7fd1-5ca0-8d63-b0c9746d3086>

	made by Armstrong Rigg Planning)		no power to require this. This requirement is still contained in Policy SAX7 and we therefore maintain our objection. It is clearly inappropriate and undeliverable to expect landowners to enhance PRoW beyond any statutory duties for their maintenance. If a PRoW is maintainable at public expense, Suffolk County Council as the Local Highways Authority has the power to provide enhancements, but the policy does not provide any confirmation that SCC is committed to a programme of PRoW enhancements in Saxmundham. The only other way for PRoW to be enhanced would be for this requirement to be included in any site specific policies as a requirement for development. In this respect we note that the policies for the Saxmundham Garden Neighbourhood include requirements for certain PRoW to be upgraded. This is the appropriate part of the plan for such requirements to be introduced. To ensure that the modified SNDP presents a deliverable approach to PRoW improvements, we request that the wording of Policy SAX7 is amended as follows: <i>“Existing Public Rights of Way, including bridleways and footpaths, should be protected and where possible enhanced to promote walking and cycling.”</i>	the wording has been endorsed though public examination and referendum and the statutory consultee SCC has not asked for this aspect to be changed. The proposed change would weaken the policy	
203	Individual 9	Policy SAX6	I will be keen to see that PRoW are maintained and access is for all.	Noted	No change
204	Individual 13	Policy SAX6	Please see comments in question SAXGN3 above.	Noted	No change
205	Individual 15	Policy SAX6	okay	Noted	No change
206	Individual 18	Policy SAX6	I support the policy: Public Rights of way	Noted	No change

**POLICY SAX7 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
207	Individual 14	Policy SAX7	I am very concerned about the growing issue of parking provision. I live on the high street and have been told my exemption to park outside the post office is being revoked. The alternative is to pay £38 per month for the public car park. No free parking is available as the change of use in the post office means St John's Road is blocked by postal workers parking. Where are high street residents supposed to park? This is only going to be exacerbated with huge numbers of new residents.	Noted. The NP scope does not include parking charging regimes	No change
208	Individual 15	Policy SAX7	okay	Noted	No change

**POLICY SAX8 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
209	Individual 15	Policy SAX8	okay	Noted	No change
210	Individual 18	Policy SAX8	Support	Support noted	No change

**POLICY SAX9 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
211	East Suffolk Council	Paragraph 10.8-10.9	In addition to referencing the relevant local Plan policies here, you could also include reference to the East Suffolk Affordable Housing SPD: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Affordable-Housing/Affordable-Housing-SPD.pdf	Noted. A reference to the SPD can be included in the text or possibly as an appendix.	Amend paragraphs 10.8-9 <input checked="" type="checkbox"/>
212	Individual 15	Policy SAX9	okay	Noted	No change
213	Individual 18	Policy SAX9	Support	Support noted	No change

**POLICY SAX10 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
214	Individual 14	Policy SAX10	Residents of the high street are seeing their lives become increasingly miserable because of the heavy flow of traffic down the high street. The noise pollution is becoming unbearable, the lack of weight limit means huge HGVs are charging down the high street literally leaving houses shaking in their foundations, and antisocial driving is the norm as there are no deterrents. The speed limit is also FAR too high. If the high street around the Market Square becomes one way as the proposal presents, why can't it go further? Our high street suffers hugely because its design favours cars over people and community. I routinely get hit by wing mirrors simply leaving my house and walking down the high street. I am not confident this plan mitigates this.	Comments noted. See also Policy SAXTC and the town centre chapter. It is not accepted that HGV traffic in the town has worsened	No change
215	Individual 15	Policy SAX10	okay	Noted	No change
216	Individual 18	Policy SAX10	Support	Support noted	No change

**POLICY SAX11 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
217	William Notcutt Estates (representations made by Armstrong Rigg Planning)	Policy SAX11	<p>SAX11: Non-Designated Heritage Assets</p> <p>We objected to the identification of our client's land at '4. The Layers' as a Non-Designated Heritage Asset as the now made SNDP presented insufficient and inaccurate evidence to demonstrate that the area meets the relevant criteria. We also objected to the wording of the policy that could prevent the site from coming forward as Suitable Alternative Natural Greenspace (SANG), but note that this wording was subsequently amended to be more flexible by the SNDP examiner. There has been no change to the policy in the draft modification SNDP and we therefore repeat our objection with respect to the identification of the Layers as a Non-Designated Heritage Asset.</p> <p>The policy states that the proposed non-designated heritage assets have been assessed against criteria based on the Local Heritage Listing: Historic England Advice Note 7. We initially objected to the identification of the Layers as a non-designated heritage asset on the grounds that the previous regulation 14 SNDP presented little to no evidence to demonstrate that the area meets the relevant criteria. The only evidence presented at the previous regulation 14 stage was a 57 word entry in a table at Appendix B which erroneously</p>	<p>Comments noted. However this policy is not proposed to be modified.</p> <p>The policy as currently worded was approved by the Examiner who considered all relevant evidence.</p>	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>claimed that there have been archaeological finds across the site.</p> <p>Historic England Advice Note 7 is clear that as a minimum nominations need to be backed by information of sufficient detail and accuracy to demonstrate that they meet the requirements set by the selection criteria and by national planning policy. In response to our comments, further information was added to Appendix B at the previous regulation 16 stage, but it was and remains woefully inadequate in both its detail and accuracy.</p> <p>To take the assessment of 'rarity' and 'archaeological interest' set out at Appendix B as examples. Under rarity, the Layers is assessed as "Potentially the largest area of unrecorded archaeological interest in the parish" and under archaeological interest the assessment reads:</p> <p><i>"Archaeological finds across the site. According to the Historic Environment Record held by Suffolk County Council , Geophysical survey in The Layers provided evidence for significant archaeological activity in the east of the site. Anomalies relating to a trackway and adjoining settlement are present. There is evidence for enclosure ditches and possible sub-enclosures and there are discrete responses present that could be related to the remains of the structures or areas of burning or industrial</i></p>		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p><i>activities. There is a change in the background magnetic responses in the east of the area that is suggestive of a change to, or an increase in the amount of alluvial deposits, presumably associated with the adjacent watercourse. The study site is thought to have a moderate potential for further – as-yet undiscovered – archaeological remains of Prehistoric and Roman date, and a low potential for significant (i.e. non-agricultural) remains from all other periods."</i></p> <p>These assessments demonstrate a complete lack of understanding of the archaeological record to the extent that they are inaccurate and misleading. The previous archaeological work referred to in the Historic Environment Record held by Suffolk County Council was undertaken in 2017 to support previous proposals (as part the wider site's promotion to the Local Plan) for residential development on the Layers and the creation of new parkland open space on land to the east of South Entrance. An Archaeological Desk-Based Assessment was produced by CgMs (Enclosure A) and an Archaeological Geophysical Survey was undertaken by Phase Site Investigations (Enclosure B).</p> <p>The Desk-Based Assessment does identify that "The study site is thought to have a moderate potential for further – as-yet undiscovered – archaeological remains of Prehistoric and Roman date, and a low potential for significant (i.e. non-agricultural) remains from all other</p>		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>periods.” (as directly quoted in SNDP Appendix B), but to put this in context it also states that “There is currently only one recorded archaeological feature within the study site: a double line cropmark to the east of the B1121” (i.e. on the part of the formerly proposed development site that is not on the Layers) and that “There is no indication that the site contains archaeological remains that would prohibit development or would be act as a major constraint on design and layout of new development.”</p> <p>The features identified in the Geophysical Survey that are quoted at SNDP Appendix B as being in the east of the site are not on the Layers either. The reference here is to the east of the formerly proposed development site and it refers to land to the east of South Entrance that is not part of the Layers.</p> <p>To conclude from these assessments that the Historic Environment Record demonstrates that the Layers is “Potentially the largest area of unrecorded archaeological interest in the parish” is incorrect. There is no evidence that the Layers are of any particular archaeological interest that would put them above any other field in the parish.</p> <p>In addition to the above inaccuracies we note that the assessment of ‘Historic interest’ states that “On the southern edge of the layers at Kiln Lane, Bigsby’s</p>		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>Corner, there still stands the former "Pest House", originally known as "The Small-Pox House". This is where inhabitants of Saxmundham were put in quarantine if they were suffering from infectious diseases. This was also used during WW1 for housing for Italian POWs." This building is not on the Layers. Kiln Lane is separated from the area identified as the layers by a c.50m wide strip of woodland.</p> <p>The Historic England guidance also recommends that public nomination of assets can be a useful process. This has not been done and the Neighbourhood Plan is clear at 11.21 that the household survey did not ask specific questions about heritage.</p> <p>The above demonstrates that the accuracy of information provided in the Appendix B assessment of the Layers cannot be relied upon and therefore its identification as a non-designated heritage asset fails to meet the tests set by Historic England Advice Note 7. SNDP Policy SAX12 has not had due regard to national guidance and therefore fails to meet the basic conditions. We note that the examiner of the now made SNDP provided only a cursory assessment of the proposed non-designated heritage assets in the Examiners Report which does not raise a concern with the evidence presented. We therefore request that this matter is reviewed in the interest of positive evidenced based plan making as there is clearly insufficient</p>		

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			evidence to justify the identification of our client's land at a non-designated heritage asset.		
218	Individual 15	Policy SAX11	okay	Noted	No change
219	Individual 18	Policy SAX11	Support	Noted	No change

**POLICY SAX12 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
220	William Notcutt Estates (representations made by Armstrong Rigg Planning)	Policy SAX12	SAX12: Gateways, views and the landscape setting We objected to the identification of important local views 2 and 7. Policy SAX13 requires these views to be conserved and enhanced and yet there is no recognition that the proposed provision of SANG on our client's land could significantly change the character of these views. There is no change to the proposed protected views and our objection therefore still applies.	Noted. There is no change proposed to the protected views in the Plan which were tested through the examination process	No change
221	Individual 14	Policy SAX12	How will such a huge surplus of houses affect our natural environment?	Noted. This policy is not proposed to be amended from the adopted version, and there are specific policies in the Garden Neighbourhood Chapter aimed at managing the new development	No change
222	Individual 15	Policy SAX12	okay	Noted	No change
223	Individual 18	Policy SAX12	Support	Noted	No change

**POLICY SAX13 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
224	East Suffolk Council	Paragraph 11.36	For accuracy we suggest amending the final sentence to read 'A minimum of 10% gain in biodiversity is now mandatory on almost all planning applications except for a small number of statutory some minor exceptions'	Update paragraph accordingly	Amend 11.36 <input checked="" type="checkbox"/>
225	East Suffolk Council	Paragraph 11.36	Minor typo- unnecessary '.' Between 'exemptions' and 'and'	Typo to be corrected	Amend 11.36 <input checked="" type="checkbox"/>
226	East Suffolk Council	SAX13: Protection and enhancement of natural assets	While, SAX13 hasn't been reviewed in the modified NP, to assist with implementation the phrase 'hedgehog doors' could be replaced with 'hedgehog friendly fencing' or 'hedgehog access points' which refer to where boundary/garden fences have 13x13cm holes to allow the movement of hedgehog across the development.	Noted. This policy is not proposed to be updated and this suggestion is not critical to its implementation.	No change
227	Individual 14	Policy SAX13	We have already lost a huge amount of trees, hedgerows and other wildlife habitats through ongoing destruction caused by Sizewell C and other energy projects. The government is focused solely on cutting through 'red tape' rather than safeguarding our natural environment. How is this project going to mitigate environmental impact when our countryside is already being choked?	Noted. The concept of Biodiversity Net Gain has been introduced nationally to safeguard and enhance biodiversity	No change
228	Individual 15	Policy SAX13	okay	Noted	No change
229	Individual 18	Policy SAX13	Support	Noted	No change

**POLICY SAX14 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
230	East Suffolk Council	11. Parish wide: Heritage and the natural environment, Paragraph 11.39 onwards	Here, and elsewhere in the plan you may wish to include reference to the East Suffolk Healthy Environments SPD which was adopted in 2024 and includes guidance on matters such as open space provision, allotments and SANG: https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Healthy-Environments/Healthy-Environments-SPD-Adoption-version.pdf	Text can be updated to make appropriate reference to SPD.	Amend as appropriate <input checked="" type="checkbox"/>
231	Individual 15	Policy SAX14	yes allotments are good for community	Support noted	No change
232	Individual 18	Policy SAX14	Support	Support noted	No change

**POLICY SAX15 and associated chapter
(note, small amendment in list)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
233	William Notcutt Estates	Policy SAX15	SAX15: Local Green Spaces	Noted.	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
	(representations made by Armstrong Rigg Planning)		<p>We initially objected to the designation of our client's land as Local Green Space in the previous regulation 14 consultation as this would have impacted on its successful delivery as SANG to support the Garden Neighbourhood. The policy was subsequently amended to instead allocate the site as SANG land. We supported this change, but recommended that the SNDP should be supported by a Habitats Regulations Assessment as it seeks to set a masterplan and development principles for the Garden Neighbourhood including regarding the required SANG mitigation provided. We continue to recommend that an HRA is required, especially given that SNDP includes new policies that seek to guide the development of the Saxmundham Garden Neighbourhood.</p> <p>Our client continues to support the provision of SANG on their land, but they have not been contacted by Pigeon or the Town Council to discuss its inclusion within the emerging masterplan for the Saxmundham Garden Neighbourhood. Pigeon's published masterplan states that it includes SANG land in excess of guidance requirements and in this context it appears likely that our client's land will not be required. Whilst our client supports the potential development of their land for SANG to serve the Saxmundham Garden Neighbourhood, it is clearly inappropriate for it to be allocated as such indefinitely if it is not required for</p>	<p>The SEA and HRA Screening Processes have been carried out by ESC who concluded that further work in terms of SEA and HRA was not required. This has been consulted on with Natural England who have indicated their agreement. See Basic Conditions Statement.</p> <p>The identification of SANG is</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>this purpose. As such, we recommend the following amendments to Policy SAX15:</p> <p>Suitable Alternative Natural Greenspace (SANG) Land east of the Railway line and to the south of Saxmundham, including land known as The Layers is identified as an area of open space and SANG, <u>that may be required</u> in connection with the South Saxmundham Garden Neighbourhood which will serve to meet the informal day to day recreational needs of both the new Garden Neighbourhood and the existing community whilst allowing for the retention of the existing uses of the land where it complements the delivery of the open space and the SANG, The location, design and access of the proposed SANG should take into account the purpose of the SANG, the need for easy and safe access to it together with potential impacts on landscape, nature conservation and heritage. <u>A larger area of land than that which is likely to be required for SANG is currently shown as part of the SANG allocation. The purpose of this larger allocation is to provide suitable flexibility in the delivery of the Saxmundham Garden Neighbourhood. Once planning permission has been granted for the Saxmundham Garden Neighbourhood, any allocated land that it not required as SANG will now longer be considered to be allocated for this use.</u></p>	<p>part of the Local Plan allocation and can only be changed through Local Plan Review. The NP cannot conflict with the Local Plan policy .</p> <p>However the indicative draft masterplan for the site in the Local Plan shows the area as open space.</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
234	Individual 15	Policy SAX15	maintain	Noted	No change
235	Individual 18	Policy SAX15	Support	Support noted	No change

**Policy SAX TC and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
236	Individual 9	Policy SAXTC1	I would like to see more being done to improve traffic calming measures and that illegal parking is followed up.	Noted	No change
237	Individual 14	Policy SAXTC1	See further comments about high street traffic flow and anti social driving, and parking issues leaving residents high and dry.	Noted	No change
238	Individual 15	Policy SAXTC1	okay	Noted	No change
239	Individual 18	Policy SAXTC1	Support	Noted	No change

**POLICY SAXSA1 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
240	Individual 15	Policy SAXSA1	okay	Noted	No change
241	Individual 18	Policy SAXSA1	Support	Support noted	No change

**POLICY SAXSFR1 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
242	Individual 14	SAXSFR1	*Redacted for data protection - Address Supplied*	Noted	No change
243	Individual 15	SAXSFR1	okay	Noted	No change
244	Individual 18	SAXSFR1	Support	Noted	No change

**POLICY SAXFS1 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
245	Individual 18	Policy SAXFS1	Support	Noted	No change

**POLICY SAXFC1 and associated chapter
(NO CHANGE)**

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
246	Individual 9	Policy SAXFC1	This is a good area that needs investment to enable more residents to make good use of it.	Noted	No change
247	Individual 15	Policy SAXFC1	okay	Noted	No change
248	Individual 18	Policy SAXFC1	Support	Noted	No change

Design Guidelines and Codes

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
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249	Essex and Suffolk Water	Design Guidelines and Codes	<p>Thank you for including Essex & Suffolk Water in the consultation process. We welcome the opportunity to contribute and appreciate the reference to water within the Design Guide, particularly the measures outlined in Appendix E.</p> <p>We are pleased to see the inclusion of water efficiency features for existing homes—such as low-flow showers and taps, insulated tanks, and hot water efficiency—as well as the more ambitious proposals for new homes, including water management and cooling, enhanced water efficiency standards, green roofs, and reflective walls.</p> <p>While we support these statements, we would welcome the opportunity to see them go further. Specifically, we would like to request the inclusion of a design policy requiring that all new dwellings meet, as a minimum, the Building Regulations optional requirement for water efficiency of 110 litres per person per day.</p> <p>However, Essex & Suffolk Water considers 110 litres/person/day to be a minimum standard. We would prefer to see a policy that requires new homes to be designed to achieve 85 litres per person per day, in line with the recommendations set out in the Shared Standards for Water Efficiency in Local Plans. For your reference, we have attached a copy of this document to support our response.</p> <p>Please do not hesitate to get in touch if you require any further information or clarification. We look forward to continuing to work together to promote sustainable and resilient water use across new developments</p>	<p>Comments noted. It is not proposed to include such a policy in the modified NP as this would be in conflict with the existing Local Plan policy SCLP9.2 on sustainable construction as the NP would be asking for more rigorous standards. However such a policy would be appropriate for the LP Review.</p>	No change
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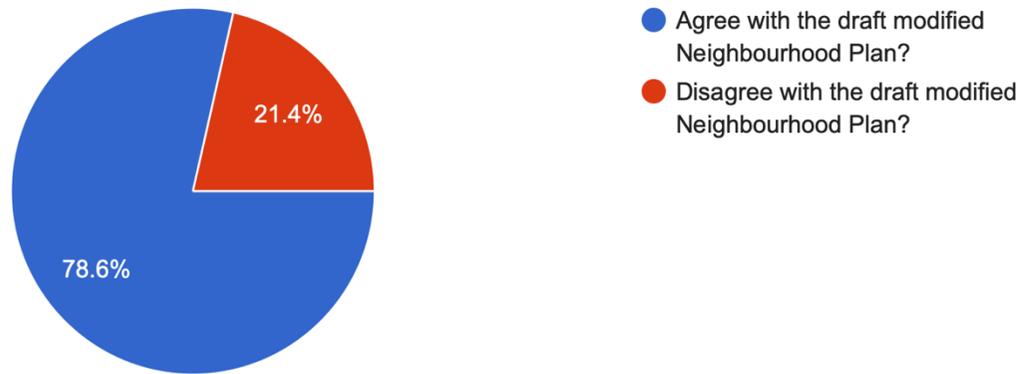
250	Individual 15	Design Guidelines and Codes	okay	Noted	No change
251	Individual 18	Design Guidelines and Codes	Support	Noted	No change

Town Centre Concept masterplan

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB response	Action
252	Individual 15	Concept masterplan	okay	Noted	No change
253	Individual 17	Concept masterplan	It's encouraging to see the Town Council considering traffic calming measures on the High Street, including reducing the carriageway width and widening the pavements. I believe these changes could bring real, positive benefits to the area. Additionally, the idea of pedestrianising the High Street on specific days, such as Market Days, is worth further exploration. Overall, the proposed upgrades to both the pavements and roadway are very promising.	Support noted	No change

OVERALL, do you

14 responses



Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
254	East Suffolk Council	Final comments	We would welcome further discussion on these comments, particularly given the complexities of the relationship between the Neighbourhood Plan and South Saxmundham Garden Neighbourhood allocation. Please feel free to get in touch to arrange a discussion. In any event, I would appreciate it if you would share drafts of your plan and supporting documents with the Council ahead of the formal submission.	Noted and welcomed. NB A follow up meeting to discuss key matters with ESC was held on 24 th September	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
255	Pigeon Investments (representations made by LDA design)	Final comments	<p>Overall Matters</p> <p>1. To be consistent with the approach typically adopted for Neighbourhood and Local Plans, it is not appropriate to refer to a particular company in relation to matters covered by the Plan. As such, all references to Pigeon should be removed.</p> <p>2. The Modified Neighbourhood Plan should acknowledge the potential for the delivery of Services along the A12, noting Saxmundham's close relationship with this aspect of the strategic highway network in Suffolk.</p> <p>3. The emerging Neighbourhood Plan refers to STC's potential use of the Saxmundham Concept Masterplan for the Garden Neighbourhood produced by consultants AECOM in July 2021. This document does not form part of the currently adopted (Made) Neighbourhood Plan. If STC is seeking to reinstate this document via the adoption of the updated Neighbourhood Plan, then greater clarity and further consultation is required as this document is at significant odds with the Masterplan Framework Document currently being produced collaboratively with STC, the NPSG, the wider community and ESDC.</p>	<p>Noted. References to be removed</p> <p>This section is to be reworded as a consequence of other representations.</p> <p>Noted . Reference to the AECOM masterplan can be removed. It is not being relied upon for policy.</p> <p>Noted. SCC have referred</p>	Amend accordingly <input checked="" type="checkbox"/>

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>4. It is considered reasonable for the emerging Neighbourhood Plan to refer to the former secondary school site. However, given the current uncertainty regarding the site's reuse the Neighbourhood Plan should be clear about the likely delivery prospects of any proposals. A dialogue has been established with Suffolk County Council (SCC) but it has been acknowledged that the County is awaiting decisions to be made by the Government's Department of Education before any meaningful discussions can take place regarding the reuse of the former secondary school site.</p> <p>5. From the collaborative work undertaken with the NPSG, and from some of the wording in this draft Plan it appears that the Plan's support for the Services proposed to the west of the A12 is contingent on 'the delivery of benefits to the community which outweigh the adverse impacts of the proposed additional commercial development' (Services). It should be noted that the provision of Services for the A12 is supported by wider Government policy – which seeks to cater for A12 road users. Furthermore, 'adverse impacts' have not been satisfactorily demonstrated, and even if this were to be the case, to a degree, it has also not been established that the provision of indoor sports</p>	<p>to it in their response however the position is still to be clarified.</p> <p>Noted . This section is to be reworded as a consequence of other representations from East Suffolk.</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>facilities would be a proportionate element of 'public benefit' by way of mitigation.</p> <p>6. From the recent public exhibitions undertaken for the Masterplan Framework Document responses have been received supporting the provision of Roadside Services as part of the South Saxmundham scheme.</p> <p>7. It should be noted that only part of the land to the east of the railway line is proposed for use as SANG – the rest currently being country park.</p> <p>8. During these representations we have made frequent reference to the continuing collaborative arrangements for preparing the SSGN Master Plan Framework Document, which has been the subject of thorough community engagement. This and the preparation of associated supporting documents, including Design Guidance will provide the framework as well as more detailed guidance to shape the delivery of the Garden Neighbourhood. Consequently, it is not appropriate for the draft Modified Neighbourhood Plan to refer to the previous AECOM work at all. We have</p>	<p>Noted.</p> <p>Noted. However the Local Plan does not make reference to a country park.</p> <p>Noted . Refence to the AECOM masterplan will be removed.</p>	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			<p>commented on the principle of preparing new design codes for the Garden Neighbourhood that can potentially be applied more widely across the Neighbourhood Plan area but used as supplementary guidance rather than policy as currently proposed in this draft of the emerging Neighbourhood Plan.</p> <p>9. Pigeon has been engaged in productive discussions with the Town Council, Neighbourhood Plan Steering Group, East Suffolk District Council, Suffolk County Council and wider stakeholders and the community regarding the delivery of the South Saxmundham scheme and appreciates the opportunity to provide positive and constructive comments on the emerging Neighbourhood Plan.</p> <p>If there are any matters raised in these representations which the Town Council would like to discuss, please do not hesitate to contact us.</p> <p>It is very much hoped that the collaborative working towards the delivery of the South Saxmundham scheme continues and we look forward to meeting with you again in the very near future.</p>	Noted and welcomed	

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
256	Suffolk Wildlife Trust (NOTE: Late response)	Final comments	<p>Summary</p> <p>Suffolk Wildlife Trust encourage Saxmundham Town Council to include the best possible outcomes for nature and biodiversity within the modifications to the Saxmundham Neighbourhood Plan and welcome the opportunity to engage further in the delivery of such improvements.</p> <p>Please keep us informed of further discussion or consultation on the modifications to the plan, or get in touch with specific questions regarding our comments and we would be happy to discuss points raised further,</p>	Support noted	No change
257	Individual 3	Final comments	<p>Building 800 houses in Saxmundham will have an enormously adverse impact on local infrastructure and the local people and those living in the immediate area would very much like verification and assurance that these new houses are not for illegal/legal migrants and the social ills associated with incompatible cultures.</p>	Noted. The allocation is from the 2020 Local Plan. The basis of the final comment is rejected by the Town Council .	No change
258	Individual 5	Final comments	<p>Building 800 houses in Saxmundham will have an enormously adverse impact on local infrastructure and the local people and those living in the immediate area would very much like</p>	Noted. The allocation is from the 2020 Local Plan. The	No change

Ref	Respondent	Reference (paragraph or policy number)	Comment	QB Response	Action
			verification and assurance that these new houses are not intended for illegal and legal migrants and the social ills associated with incompatible cultures.	basis of the final comment is rejected by the Town Council .	
259	Individual 8	Final comments	More thought needs to be given to the impact of the Garden Neighbourhood Estate.	Noted. The purpose of the modified NP is to try to manage these impacts	No change
260	Individual 15	Final comments	Resist the NIP's in our town. My other comment is that to be respected and true to our values we should make sure that the town centre is LITTER free and also that the overgrown plants sticking out of high street buildings and in Fromus Sq. are kept down. Also same as graphiti. This impacts look and feel to visitors and their opinion as not cared about and run down.	Noted. See also the Town Centre Section and Policy SAXTC which addresses some of these issue	No change
261	Individual 18	Final comments	no	Noted	No change

Modified Saxmundham Neighbourhood Plan

Statement of Saxmundham Town Council, as Qualifying Body, to accompany Submission Version, Regulation 15(1)(f) of the Neighbourhood Planning (General) Regulations 2012

January 2026

Decision:

Saxmundham Town Council, after careful consideration of the issues and for the reasons set out in this statement, and summarised below, does not consider that the modifications contained in its modification proposal to East Suffolk Council are so significant or substantial as to change the nature of the made Saxmundham Neighbourhood Plan which it would modify.

Summary of reasons:

(a) the nature of the existing made Saxmundham Neighbourhood Plan (NP) is to be distilled, in the Town Council's view, from the overall Timeframe, Vision, Objectives and Policies contained in it;

(b) The modifications proposed leave the Timeframe (2022-2036), the Vision and all the existing Objectives unchanged, with simply a renumbering of one Objective relating to the Garden Neighbourhood;

(c) Of the existing 15 Policies, none are changed in substance, save only that part of Policy 15 on Connectivity is now proposed to be moved to a more specific policy;

(d) The existing Plan includes numerous and detailed references to the Garden Neighbourhood, including passages which provide the foundation for a new Objective for it, and the basis for the specific new policies relating to the Garden Neighbourhood;

(e) Previous drafts of the existing Neighbourhood Plan (including the Submission Version) had included draft policies for the Garden Neighbourhood akin to the newly proposed policies, on which wide public consultation had earlier taken place; the only exception is the new policy on Design, which draws on the area-wide Design Code (Appendix E) which has been consulted on;

(f) in short, the 4 new specific policies now put forward for the Garden Neighbourhood development are wholly consistent with the nature of the existing Plan, as distilled from the Vision, Objectives and totality of Policies;

(g) While the now proposed chapter and policy on Nationally Significant Energy projects is new, the new policy relates solely to drawing up measures for mitigation or compensation for impacts upon Saxmundham, such

mitigation measures identified being wholly consistent with other policies and objectives in the existing Plan;

(h) the modifications proposed do not include any new allocations for development, and propose no change to the settlement boundary of Saxmundham;

(i) Taken together, the modifications proposed (in particular relating to the Garden Neighbourhood and Energy Projects) – while of significance in their own right - would not, in the Town Council's opinion, be so significant or substantial as to change the nature of the existing Neighbourhood Plan.

Introduction

1. This Statement has been prepared to comply with Regulation 15(1)(f) of *the Neighbourhood Planning (General) Regulations 2012*:

Where a qualifying body submits a modification proposal to the local planning authority, it must include— (f) In relation to a modification proposal, a statement setting out whether or not the qualifying body consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the qualifying body is of this opinion.

2. The key question for the Town Council, therefore, as qualifying body for this purpose, is whether the modifications contained in this Submission Version are **“so significant or substantial as to change the nature”** of the existing (2023) Saxmundham Neighbourhood Plan (NP).

3. In July 2023, Saxmundham had its first Neighbourhood Plan adopted to guide future development in the area between 2022 and 2036. After a Community Governance Review, in April 2023 the Saxmundham Parish Boundary was amended to include land that was previously in the parish of Benhall. The reason for the Parish Boundary change, which was initiated by Saxmundham Town Council with agreement from Benhall Parish Council, was so that all of the land allocated in the East Suffolk Council - Suffolk Coastal Local Plan 2020 for the South Saxmundham Garden Neighbourhood, and some adjacent land (west of the A12) proposed for related development, would fall within the parish boundary of Saxmundham.

4. In December 2023, the Town Council applied to East Suffolk Council to amend the Neighbourhood Area. The request was approved by East Suffolk

Council on 30th April 2024. While this change in Area is important, it did not involve the transfer of any dwellings or population from Benhall to Saxmundham.

Main reasons for drawing up modifications

5. There are two principal reasons for the current proposal to modify the 2023 'made' Neighbourhood Plan. These are:

- To ensure, in the light of the newly designated Neighbourhood Area, that the Neighbourhood Plan and its policies can successfully influence the development of the South Saxmundham Garden Neighbourhood to gain maximum benefit for the community and ensure its proper integration with the existing settlement of Saxmundham;
- To secure that the Neighbourhood Plan contains suitable policies for influencing the mitigations required as a consequence of the multiple Nationally Significant Energy Infrastructure Projects (NSIPs) now proposed in or impacting on the parish, if these are ultimately approved for development.

6. Before consulting the public on the earlier (June 2025) draft of the proposed Modified Neighbourhood Plan, the Town Council was required (Regulation 14) to provide a statement giving its position on the same question, with reasons, and concluded that in its opinion, the changes proposed were not so significant or substantial as to *change the nature* of the existing NP.

7. Since June, the Town Council, with the NP Steering Group, has consulted on the first draft of the Modified NP, and taken account of the points and representations made. In the light of these, the latest draft for Submission to East Suffolk Council has been prepared. This Submission Version therefore contains a number of changes since the June draft, both to the proposed new policies and the explanatory text. This applies both to Chapters 12 (on the South Saxmundham Garden Neighbourhood) and Chapter 13 (on the nationally significant energy-related infrastructure projects). The Town Council has therefore carefully considered the issue afresh in relation to this Submission Version.

The nature of the existing Neighbourhood Plan

8. There is no statutory test or definition to assist with defining the 'nature' of a Neighbourhood Plan; we have sought to assess the made Plan's nature from its key provisions and policies, and assess whether the modifications now

proposed are so significant or substantial as to change its nature, as we (as the body principally responsible for it) understand it.

9. The 2023 Plan contains a Timeframe (2022 to 2036), a Vision, a set of Objectives, and then a range of thematic or smaller area-related policies that seek to help implement the Plan's Objectives. As the 2023 Plan puts it (paras 4.2 and 4.3):

"The vision underpins the objective and policies of the Saxmundham Neighbourhood Plan and is referred to throughout. 4.3 From the vision flow the different objectives of the Neighbourhood Plan and from there, the policies."

The Vision is set out at pages 34 and 35. This is followed by 6 Area-wide Objectives, and then 5 specific "Opportunity Zone" Objectives. Here are the "Area wide Objectives":

Objective 1: To promote a strong and diverse forward looking, local economy, building upon the town's advantages as a service centre market town with a strategic location.

Objective 2: To secure for the community of Saxmundham a full range of physical and community infrastructure to meet the growing needs of the town and its environs.

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.

Objective 4: To successfully integrate - physically, environmentally, and socially - the new neighbourhood with the existing town and community of Saxmundham.

Objective 5: To promote the development of high quality, energy efficient housing to meet the needs of the people of Saxmundham.

Objective 6: To protect and enhance the conservation area, the town's heritage, green spaces, natural features and rural setting, and to address the challenges of climate change.

We would draw attention here in particular to Objective 4, which clearly relates to the future Garden Neighbourhood development.

10. If modifications to this existing Plan are to be so significant or substantial as to change its whole nature, we would argue that they would need to in some fundamental or serious way contradict or alter or delete key elements

of the above, or add so much by way of new material that such broadening of scope de facto changes its whole nature.

Do the proposed modifications affect the Timeframe, Vision, or Objectives of the existing Plan - if so, how far?

11. The Submission Version of the Modified Neighbourhood Plan proposes no change to the proposed Timeframe of the Plan (2022-2036), and no change to the Vision.

12. In terms of Objectives, all of the Area-wide and Opportunity Zone Objectives are retained unchanged, with Objective 4 renumbered as Objective SSGN2 under a new sub-heading, "South Saxmundham Garden Neighbourhood", together with a newly defined Objective (SSGN1):

South Saxmundham Garden Neighbourhood

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

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

13. In addition, there is one other new Objective in the draft Modified Neighbourhood Plan:

National Infrastructure and Energy Projects

Objective EN1: To ensure that the necessary measures required to mitigate the physical, visual and social impacts of National Infrastructure and Energy Projects on Saxmundham are identified and implemented.

14. While highlighting the need to mitigate adverse impacts of such major projects, the Town Council considers that this new Objective in no way changes or overrides the other Objectives, but rather seeks to implement or defend them in the context of those projects.

Do the proposed modifications affect the Policies of the existing Plan – if so how far?

15. The existing 2023 Plan contains the following "Area-wide" Objectives (there are also several "Opportunity Zone" policies including Town Centre

strategy, that remain unchanged) – we summarise whether any changes now proposed:

SAX1: General design principles – no change save to cross-refer to Garden Neighbourhood specific design policy

SAX2: Expansion of existing businesses – no change

SAX3: New businesses – small change to wording, not to main substance

SAX4: New community facilities – no change save to refer to Garden Neighbourhood specific policy

SAX5: Improving connectivity – part of existing policy moved to new Garden Neighbourhood connectivity policy

SAX6: Public rights of way – no change

SAX7: Parking provision – no change save cross-reference to Garden Neighbourhood design policy

SAX8: Windfall and Infill development – no change

SAX9: Tenure blind Housing Development – no change

SAX10: Historic town centre and Conservation Area – no change

SAX11: Non-designated Heritage Assets – no change

SAX12: Gateways, views and landscape setting of Saxmundham – no change

SAX13: Protection and enhancement of natural assets – no change

SAX14: Community gardens and allotments – no change

SAX15: Protection of existing Local Green Spaces – no change (save for name updating)

16. In summary, the existing Neighbourhood Plan Policies remain almost wholly unchanged in any substantial respects.

Do the new Garden Neighbourhood Policies affect the nature of the existing Plan?

17. The draft Modified Neighbourhood Plan includes 4 policies relating to the development of the Garden Neighbourhood that are not included in the 2023 'made' Plan. They are the following:

SAXGN1: Connecting the Garden Neighbourhood

SAXGN2: Green infrastructure

SAXGN3: Community Facilities

SAXGN4: Design of the Garden Neighbourhood

18. While these policies, in their present form and context within the Modified Neighbourhood Plan are new, the existing 2023 Plan has numerous references to and some policies that relate to the Garden Neighbourhood, as per the site allocated for the purpose by East Suffolk Council in the Suffolk Coastal Local Plan (2020). The development's significance for the town of Saxmundham is made clear from the outset.

19. Chapter 1 of the 2023 Plan sets out the issues at some length -see paragraphs 1.12 to 1.16, and 1.26 to 1.28. By way of example, paragraph 1.16 states:

"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."

20. Thus, the new proposed Objective for the Garden Neighbourhood draws directly from the existing Plan, and this and other paragraphs show that the policies for connectivity, green infrastructure, community facilities and design are rooted in, and wholly consistent with, the existing Plan. Far from our proposed modifications changing the nature of the existing Plan, they serve to reinforce its existing nature. The only previous obstacle was the fact that the site of the Garden Neighbourhood was not all within the then parish boundary of Saxmundham, which precluded the Plan from including policies covering the *whole* of the area allocated in the Local Plan.

21. It should also be noted that the (then) Submission Version of the 'made' Plan had included draft policies on the Garden Neighbourhood that were, ultimately, excluded by the Examiner – these had however been the subject of wide public consultation which had been taken into account in the then drafting of the Plan and policies – the specific policies in question covered (a) Connecting the Garden Neighbourhood, (b) Green Infrastructure Links, and (c) Community Facilities.

22. Therefore, the sole new Garden Neighbourhood Policy subject now put forward, and which had not been consulted upon as such in earlier iterations

of the Plan, relate to SAXGN4 on Design. This Policy (see explanation in 12.34) draws on Policy SAX1 and the Design Code (which forms Appendix E to the Neighbourhood Plan); it may thus be seen as creating a more specific Design Code for the Garden Neighbourhood development. Once more, this seeks to be consistent with the overall Objectives and thus the nature of the existing Plan.

Does the new National Infrastructure and Energy Policy affect the nature of the Plan?

23. The final new Policy put forward in the Modified Neighbourhood Plan is "SAXEN1: Addressing and mitigating the impacts of large scale energy projects". The proposals for such projects with considerable potential impacts on Saxmundham represent a new feature, and this chapter and policy are new. Since NSIPs do not fall within the normal planning framework, the proposed policy provides for drawing up and recommending "appropriate measures of local mitigation (having effect within the Neighbourhood Area), and/or compensation" to the project promoter and/or other relevant authorities or bodies.

24. The relevant local measures of mitigation referred to in the Policy relate in particular to:

- Protecting nearby residential neighbourhoods from noise, dust, vibration or other disturbance or deleterious effects
- Minimising and mitigating the adverse visual impacts of any relevant structures, e.g. converter stations, on the landscape, historic environment or urban settlement
- Mitigating any increase in flood risk or pollution in respect of the River Fromus
- Minimising and mitigating the adverse impacts on the natural environment, to wildlife and local biodiversity

25. These mitigations are all wholly consistent with the existing other Policies in the 2023 Plan, and in the Town Council's view, in no way contradict or change the nature of the made Plan.

Do the proposed modifications cover other matters that might be considered as so significant or substantial as to change the nature of the existing Neighbourhood Plan?

26. The Town Council does not consider that there are other proposed modifications in the Submission Version that are so significant or substantial as to change the existing Plan's nature.

27. We note that while the parish boundary has been altered to include all of the site allocated by East Suffolk Council in the Local Plan for the Garden Neighbourhood, this involved no population change.

28. We underline that we are proposing to make no new allocations, as part of the Modified Neighbourhood Plan.

29. We further underline that we are proposing no changes to the Settlement Boundary for Saxmundham, which already included all the land between railway and A12 earmarked for housing and other built development of the Garden Neighbourhood.

Draft modified Saxmundham Neighbourhood Plan 2022-2036



Submission draft
December 2025

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1. Modifying a 'Made' Neighbourhood Plan

- 1.1 The Saxmundham Neighbourhood Development Plan made in July 2023 provided the first ever statutory planning policy document specifically for the parish of Saxmundham. Neighbourhood Plans were introduced by the 2011 Localism Act which sought to decentralise policy making to the local level, give more powers to communities and the right to shape future development where they live.
- 1.2 The Neighbourhood Plan was supported by over 87% of residents who voted in the Referendum and the Neighbourhood Plan Area covered the civil Parish of Saxmundham (as it was at the time of Neighbourhood Area designation in 2017), shown in figure 1 below.

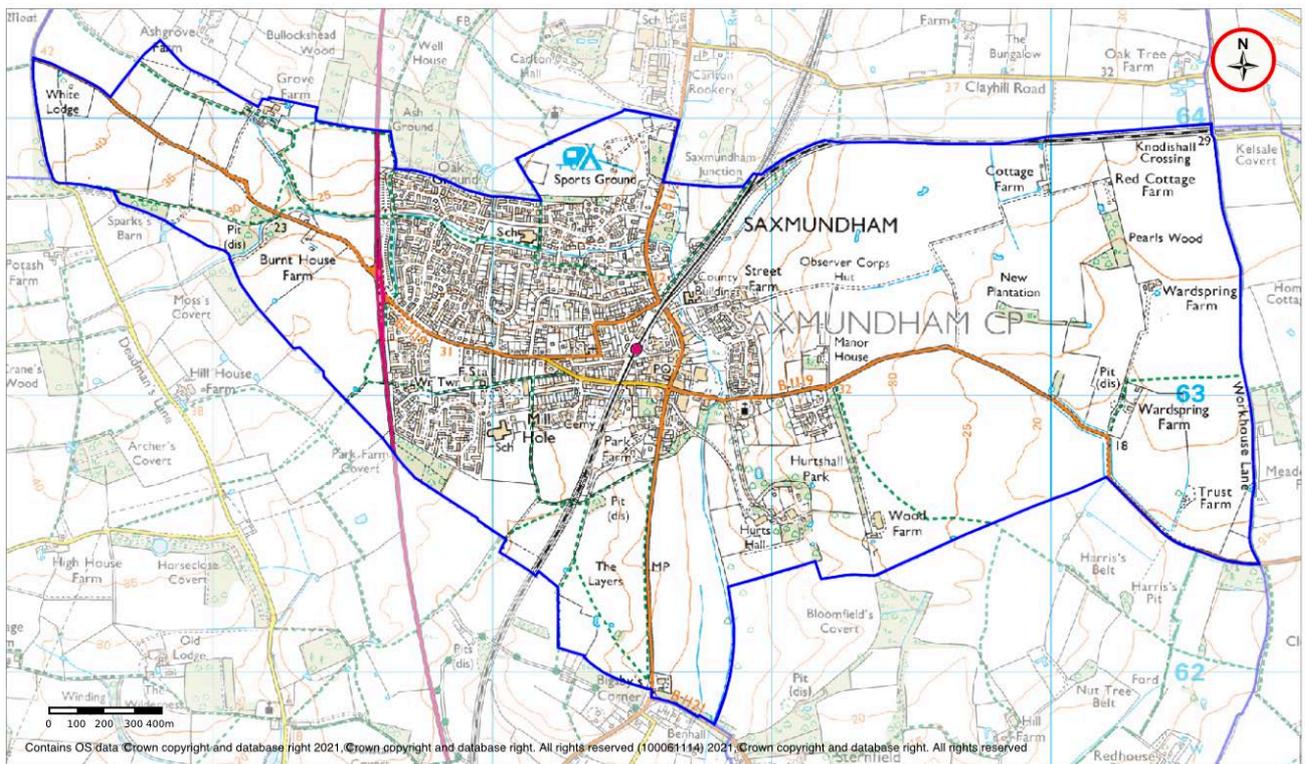


Figure 1: 2017 Saxmundham Neighbourhood Area (source: Parish Online, with own annotations). Blue line denotes parish boundary.

1.3 After a Community Governance Review in April 2023, the Saxmundham Parish Boundary was amended to include land that was previously in the parish of Benhall and Sternfield. The reason for the Parish Boundary change, which was initiated by Saxmundham Town Council with agreement from Benhall and Sternfield Parish Council, was so that all of the land allocated in the East Suffolk Council - Suffolk Coastal Local Plan 2020, as the South Saxmundham Garden Neighbourhood would fall within the parish boundary of Saxmundham. In December 2023, the Town Council applied to East Suffolk Council to amend the Neighbourhood Area so that it was consistent with the new parish boundary. The request was approved by East Suffolk Council on 30th April 2024. The new Neighbourhood Area is shown in figure 2 below.

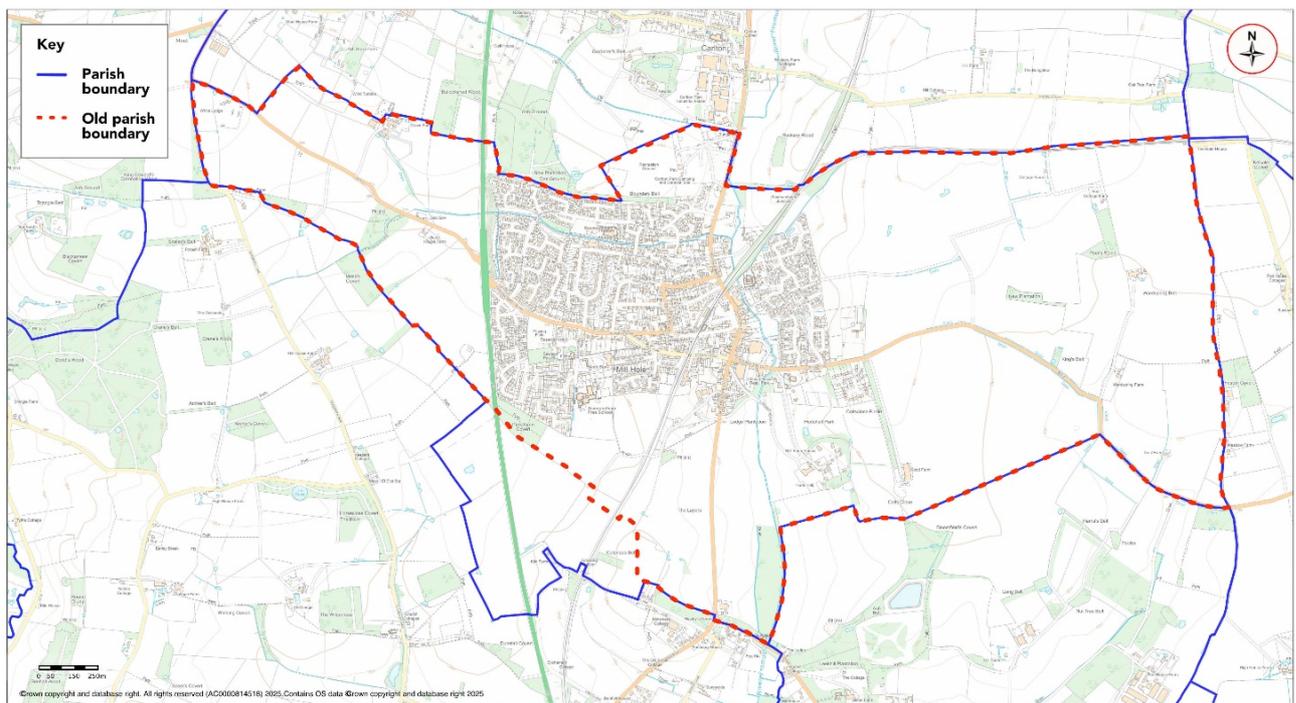


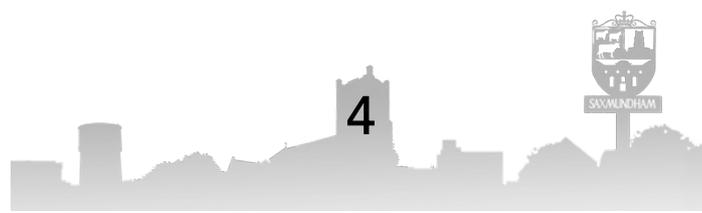
Figure 2: Map showing the new and old parish boundaries (source: Parish Online, with own annotations).

1.4 Saxmundham Town Council began a review of its made Neighbourhood Plan shortly afterwards. There are two principal reasons for reviewing or 'modifying' the 2023 Neighbourhood Plan. These are:

- To ensure that the Neighbourhood Plan and its policies can successfully influence the development of the South Saxmundham Garden Neighbourhood to gain maximum benefit for the community.
- To ensure that the Neighbourhood Plan contains suitable policies for influencing the mitigations required as a consequence of the multiple

Nationally Significant Infrastructure Projects (NSIPs) proposed in the local area.

- 1.5 The Modified Neighbourhood Plan (this document) takes the original Plan and adds further detail and justification to it in respect of the two key issues outlined above. The overarching vision and objectives are still consistent with those of the original Plan with the desire to ensure that Saxmundham remains a place which retains its distinct natural and historic characteristics, and where the services and facilities have the capacity to meet the needs of residents. Even though the made Neighbourhood Plan is still relatively up to date there have been a number of changes to national planning policy and guidance which need to be reflected in the Modified Neighbourhood Plan. In September 2025, the Local Plan reached years since adoption.
- 1.6 The Neighbourhood Plan remains a community-led document for guiding the future development and use of land in the parish between 2022 and 2036. The 2023 Neighbourhood Plan remains in force until it is superseded by the Modified Neighbourhood Plan. Once the Modified Plan is made East Suffolk Council will use it to determine planning applications. Saxmundham Town Council will use the Plan to respond to planning applications.
- 1.7 The Modified Neighbourhood Plan covers the same plan period as the made Neighbourhood Plan, and looks ahead to 2036, which is consistent with the current Local Plan.
- 1.8 The Modified Neighbourhood Plan operates in the context of the East Suffolk Council - Suffolk Coastal Local Plan. The Neighbourhood Plan's vision and objectives will be realised through policies, projects, promotions and advocacy. Most policies will guide new development across the whole plan area; some are specifically tailored to the needs of particular zones. The Town Council will promote, and collaborate with others, to realise projects which will further the vision for the town.
- 1.9 The Neighbourhood Plan's policies and proposals will rely on investment in the town by private, public, and voluntary agencies. Many of the specific proposals will only happen through partnerships and collaboration. Part of the purpose of the Plan is to give the sense of direction and momentum which will build confidence and commitment.
- 1.10 By undertaking a Neighbourhood Plan and the subsequent 'Modification', the aim remains to improve and protect Saxmundham, in the interests of its



people, as a lively, attractive, successful, and sustainable 'heritage' market town:

- playing its full role as employment and service centre for the surrounding area, and gateway to East Suffolk's attractions,
- promoting and implementing future-looking policies for economic development, social cohesion, and enhancement of the local environment,
- ensuring the successful physical, environmental and social integration of new development in the Garden Neighbourhood with the existing community,
- working with partners in public, private and community sectors to ensure coherent policy making and delivery for the town, and access to the required resources and infrastructure,
- addressing the challenges posed for the future by climate change and the need for environmental protection and improvement, across the range of policies and activities.

1.11 The Modified Neighbourhood Plan will continue 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 East Suffolk Council – 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, since the Local Plan is approved, that the Neighbourhood Plan has the responsibility, in so far as it is able, to ensure that growth is well managed and beneficial, and in accordance with the Local Plan.

The process of reviewing or modifying a made Neighbourhood Plan

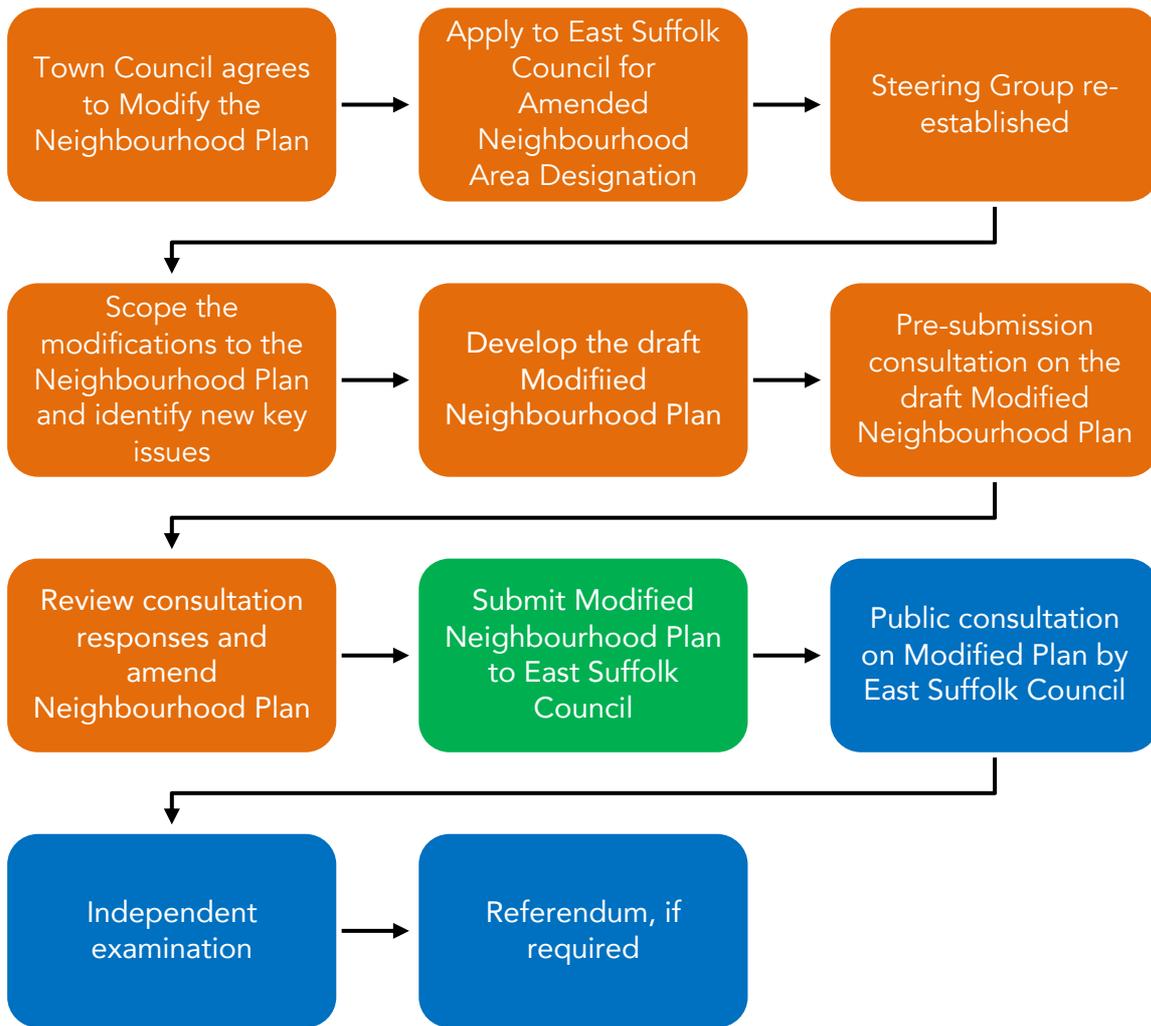
1.12 This Modified Neighbourhood Plan introduces two new chapters – one relating to the South Saxmundham Garden Neighbourhood (which builds on Local Plan Policy SCLP12.29) and the second in respect of the mitigation of the impacts of Energy Infrastructure Projects. It should be noted that the inclusion of a chapter and policy relating to the Mitigation of Energy Projects does not endorse the proposed energy projects in the area and any policies in the Neighbourhood Plan would only come into play should those proposals be endorsed through the National Strategic Infrastructure Projects (NSIPs)



process. This NSIP process is separate to the Neighbourhood Plan and is not influenced by the Neighbourhood Plan's content.

- 1.13 The remainder of the Plan has been updated where necessary but its overall direction and strategy remains unchanged. The regulations covering neighbourhood planning require that, where significant changes are made to a Plan, it has to be taken through full public consultation and if necessary another referendum before it can be adopted.
- 1.14 In the case of the Modified Saxmundham Neighbourhood Plan, the Plan is not seeking to make any additional allocations for new housing development over and above that already set out in the Adopted Local Plan. It does however include new areas of policy to provide guidance for the development of the South Saxmundham Garden Neighbourhood and new policy in mitigating the impacts of the Major Energy Infrastructure Projects in the area.
- 1.15 In developing the draft 'Modified' Neighbourhood Plan, the Town Council sought to ensure that the statutory standards for consultation on Neighbourhood Plans for Pre-Submission consultation were met. Further details are included in the Consultation Statement which accompanies this Submission Version of the Plan. This Submission Version of the 'Modified' Neighbourhood Plan has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012 (as amended). Figure 3 outlines the stages in the process.





Key

Completed stages

Current stage

Future stages

Figure 3: Stages of the Modified Saxmundham Neighbourhood Plan.

Accompanying supporting documents:

1.16 This Submission Version of the Modified Neighbourhood Plan is 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 Modified Neighbourhood Plan requires a full Strategic Environmental Assessment (produced by East Suffolk Council)
- **Habitats Regulations Screening Report** – identifies any potential impacts on protected species or habitats (produced by East Suffolk Council).

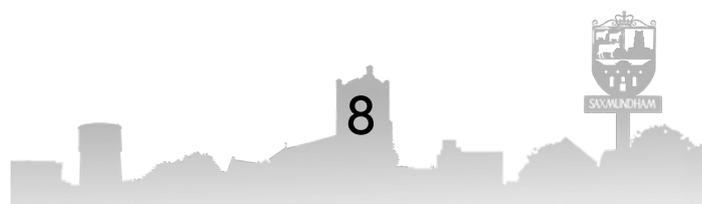
1.17 Neighbourhood Plans provide clarity, through their policies, on what will be expected from development proposals in the parish, and ensures that the impact of development is anticipated and planned for in Saxmundham. A Neighbourhood Plan is a significant document and will carry legal weight so that developers have to take note when considering future developments in the parish.

National and local planning policy context

1.18 Every local planning authority in England is required to prepare a Local Plan. Local Plans include all of the local planning policies for the district's area and identify how land is used, determining what will be built and where. The relevant Local Plan for Saxmundham is the Suffolk Coastal Local Plan which was adopted in September 2020. The Suffolk Coastal Local Plan, along with any Neighbourhood Plan, provides the basis for determining planning applications and future development in the local area and should be consistent with the National Planning Policy Framework. It should be noted that the Suffolk Minerals and Waste Local Plan Adopted in 2020 is also part of the 'development plan' for the area.

1.19 Despite a relatively short time between the 2023 Neighbourhood Plan being made and the beginning of work on the Modified Neighbourhood Plan, there have been some significant changes in the National Planning Policy context.

- The National Planning Policy Framework (NPPF) has been reviewed twice since the 2023 Plan was 'made' – in December 2023 and in December 2024. The Neighbourhood Plan Review needs to be in general conformity with the national planning policies.
- The Government (from July 2024) has shifted emphasis in national policy specifically in the areas of housing number calculations, design, Net Zero and affordable housing (specifically social rent).
- There will also be new housing requirement figures for East Suffolk, although these are to be reflected in the Local Plan Review, once this



has begun. The position at the time of writing is set out here:
<https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Open-Data/East-Suffolk-Housing-Position-Statement-September-2025-Update.pdf>

1.20 Development is defined as ‘the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land’.¹ Section 38 of the Planning and Compulsory Purchase Act 2004 emphasises that the planning system continues to be a ‘plan-led’ system and restates the requirement that ‘determination must be made in accordance with the Plan unless material considerations indicate otherwise’.

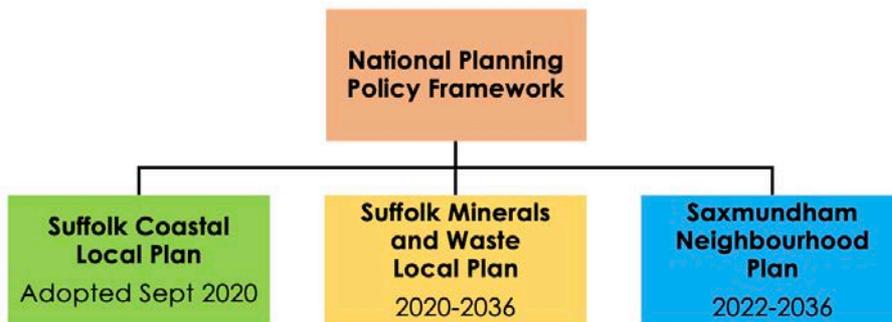


Figure 4: Spatial and strategic policy context: relationship between the NPPF, Suffolk Coastal Local Plan and the Saxmundham Neighbourhood Plan. Own diagram.

Policy framework for Saxmundham Neighbourhood Plan

1.21 Saxmundham is identified as a ‘Market Town’ in the settlement hierarchy of the adopted Suffolk Coastal Local Plan (SCLP 2020). The Local Plan (through Policy SCLP 12.28) indicates that Saxmundham will be enhanced as a market town, employment and service centre, serving a key role in meeting the needs of residents, surrounding rural communities and visitors, recognising the opportunities offered by its road and rail connections. The following Local Plan policy provides the context for the Saxmundham Neighbourhood Plan.

¹ Section 55 of the Town and Country Planning Act 1990.

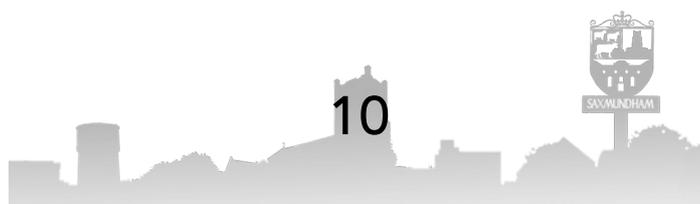
Suffolk Coastal Local Plan Policy SCLP12.28: Strategy for Saxmundham

Saxmundham will be enhanced as a market town, employment and service centre, serving a key role in meeting the needs of its residents, surrounding rural communities and visitors, 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 and the railway station.
- b. Utilise opportunities related to the presence of the railway and the proximity to the A12.
- c. Diversify and expand 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 including through enhancements to networks of green infrastructure.
- f. Increase the provision of housing and affordable housing and provide greater choice in the mix of housing available.
- g. Provide for a safe and inclusive community; and
- h. Protect and enhance the natural environment.

The creation of the South Saxmundham Garden Neighbourhood will provide new opportunities for housing, employment and community facilities, focused on the principles of an inclusive community and integration with Saxmundham and the surrounding countryside through enhancing green infrastructure networks.



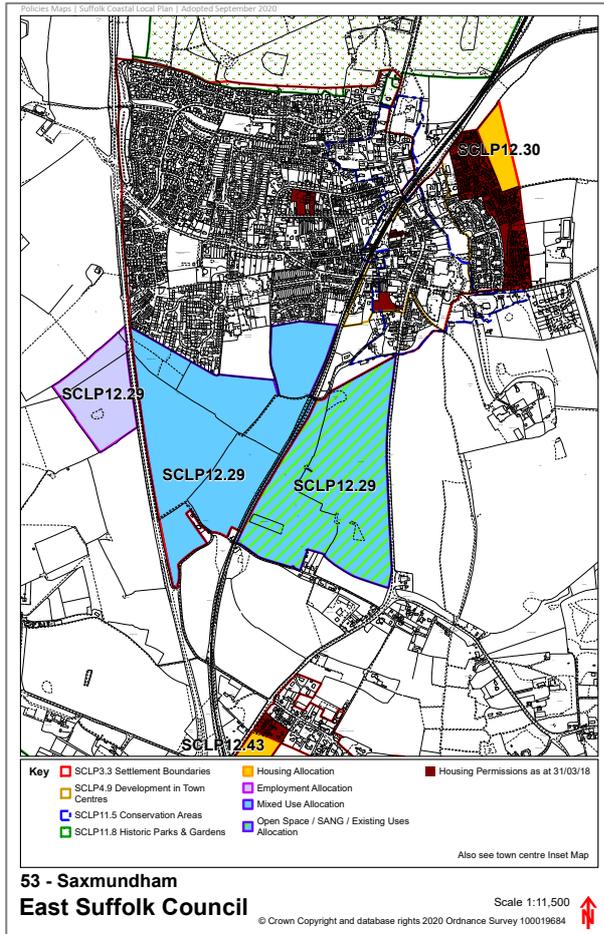
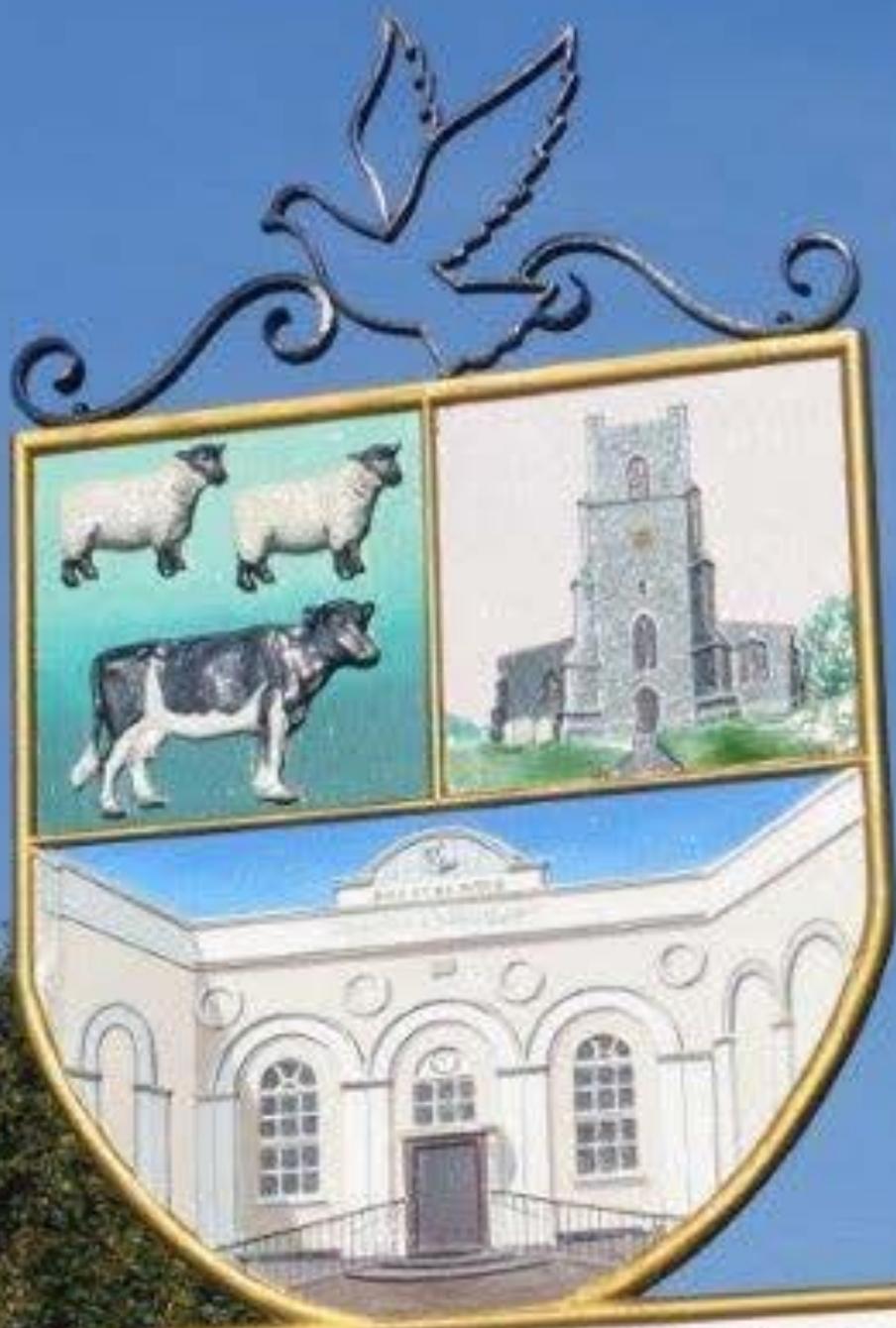


Figure 5: Saxmundham policies map, Suffolk Coastal Local Plan (adopted 2020).

- 1.22 The Local Plan identifies an area of approximately 67 hectares for development as the South Saxmundham Garden Neighbourhood which is expected to provide an education led scheme of approximately 800 dwellings, community facilities and employment land. This issue is dealt with in detail in **Chapter 12**.
- 1.23 In addition to the South Saxmundham Garden Neighbourhood, the Local Plan makes a further allocation which is SCLP12.30: Land North-East of Street Farm, Saxmundham. This allocation is for 2.18ha and approximately 40 dwellings northeast of Street Farm, to the east of the built-up area of Saxmundham. This has now been developed.
- 1.24 Due in particular to the level of new housing growth proposed in the Local Plan, the Modified Saxmundham Neighbourhood Plan is not allocating any further specific sites for development. Instead, its proposed policies will focus on managing the impacts of the proposed growth and ensuring that the community benefits are realised. A number of areas are however identified as offering future potential for a range of types of development that it is considered would benefit the parish (see **Opportunity Zones policies** section).



SAXMUNDHAM

4.7m
15'6"

Kelsale B1121

Lowestoft

2. Saxmundham parish

2.1 Saxmundham is in a strategic location being roughly equidistant from Ipswich and Lowestoft, the two principal economic centres of East Suffolk district. It is served both by the A12 and the East Suffolk line of Greater Anglia railways. It also acts (largely due to its station) as a 'gateway' to the Suffolk Heritage Coast, the tourist resorts of Aldeburgh and Thorpeness and the international music venue at Snape Maltings.

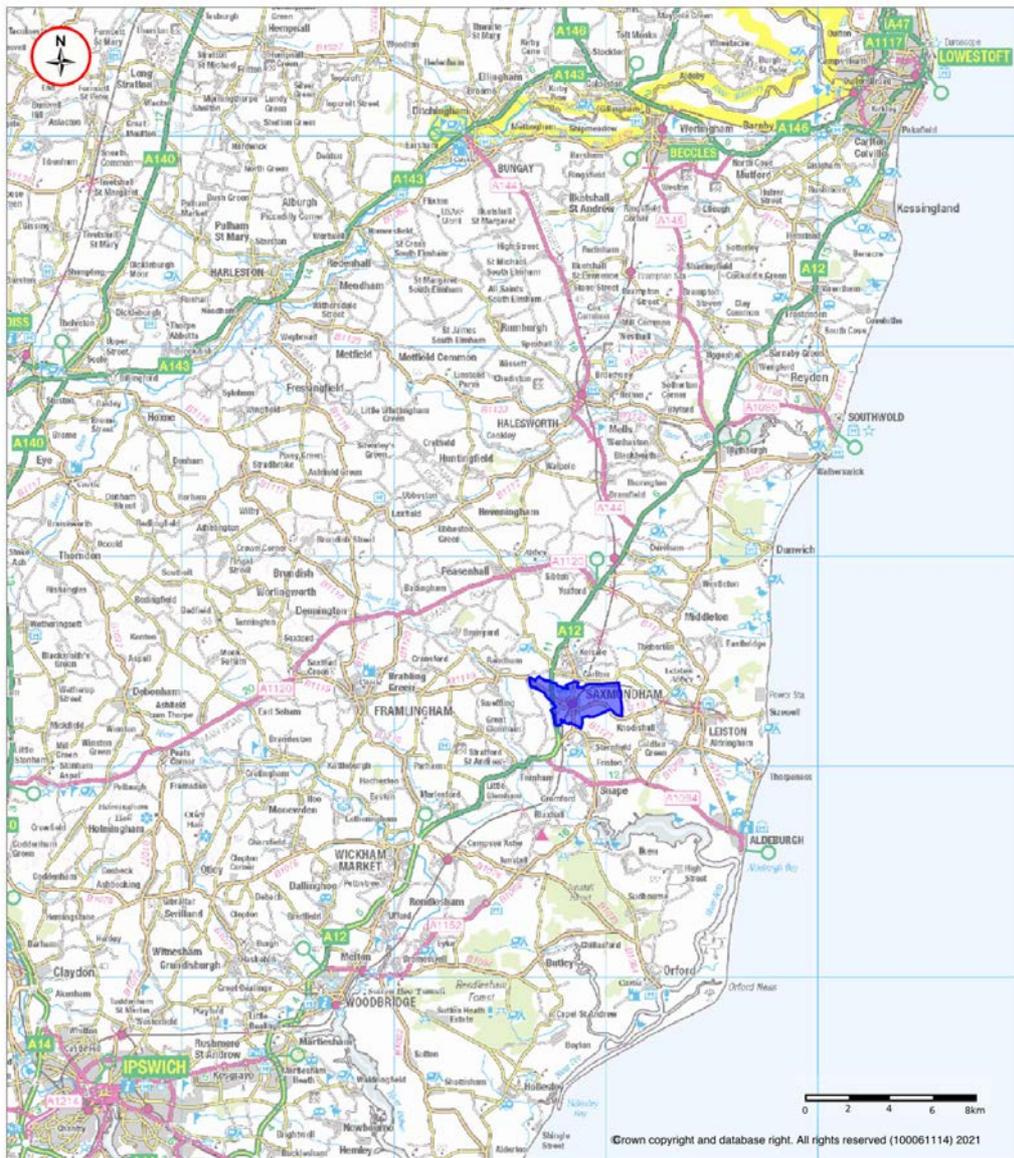


Figure 6: Location of Saxmundham (source: Parish Online, with own annotations).



Demographic profile of Saxmundham²

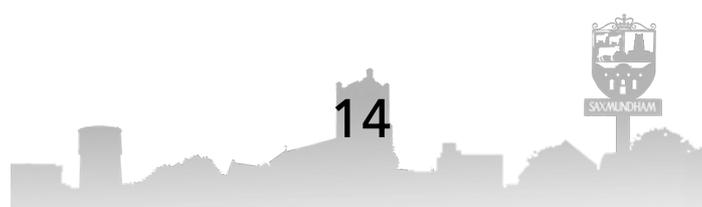
- 2.2 The population of Saxmundham parish/ward in 2021 according to the Census was 4,773, up from the 2011 census figure of 3,644. The town has grown by nearly one-third in the last 20 years. The population in 2021 was 52.4 per cent female and 47.6 per cent male which showed a slight increase in the number of males since the 2011 census. Further information can be accessed from the Saxmundham Data Profile 2024 which accompanies the Neighbourhood Plan.
- 2.3 The following table shows the age categories in Saxmundham parish from the 2011 and 2021 Census.

Age category	Census 2011 number	Census 2011 percentage	Census 2021 number	Census 2021 percentage
Total	3,644	100%	4,773	100%
Aged 15 and under	706	19.3%	964	20.2%
Aged 16 to 64 years	2,061	56.5%	2,716	56.9%
Aged 65 years and over	877	24.1%	1,093	22.9%

Figure 7 above: Age structure of Saxmundham parish Census 2011 and 2021. Source: Nomis website. Information obtained 09.09.2024.

- 2.4 The graph below shows the age of Saxmundham, East Suffolk and Suffolk residents in 5-year age categories in 2021. There is a higher percentage of young people in Saxmundham aged 19 years and under compared to East Suffolk and Suffolk. There is a lower percentage of people aged 50 to 74 years in Saxmundham parish compared to East Suffolk and Suffolk.

² Data from the Suffolk Observatory website.



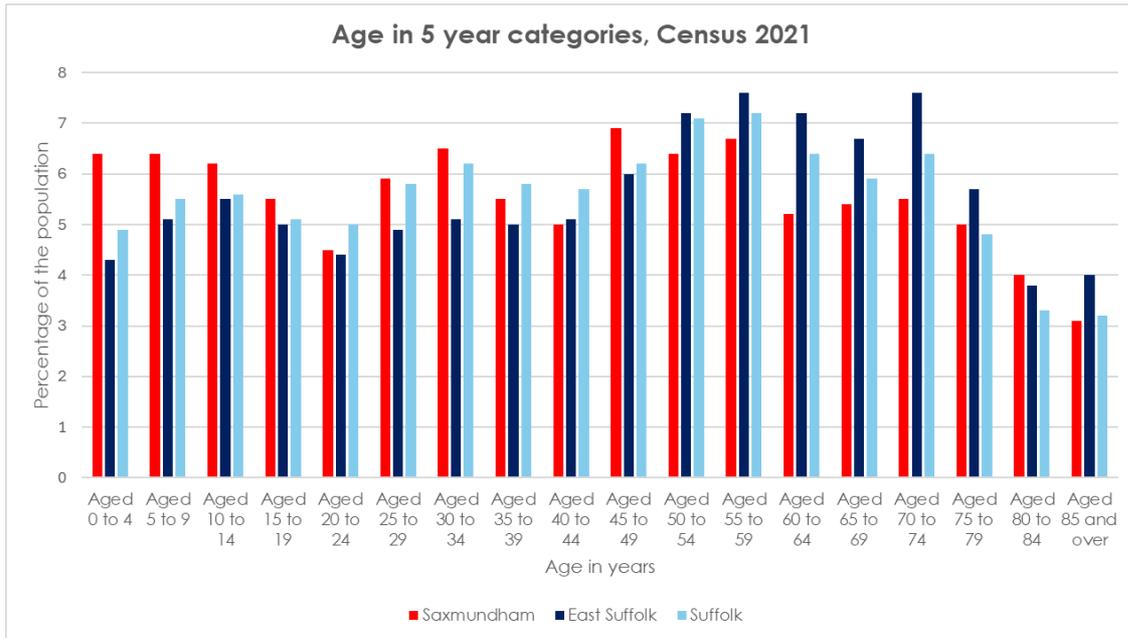


Figure 8 above: Graph showing the age of Saxmundham, East Suffolk and Suffolk residents in 5-year age categories. Census 2021 (source: www.ons.gov.uk/visualisations/customprofiles/build/. Information obtained 09.09.2024).

Housing

2.5 Over the period 1 April 2014 to 31 March 2024, East Suffolk Council records show there were 485 net additional dwellings built in Saxmundham parish. Full details are shown in the Data Profile.

Year	Housing completions Saxmundham parish
2023/2024	4 (provisional figure, may be subject to change)
2022/2023	1
2021/2022	21
2020/2021	26
2019/2020	50
2018/2019	56
2017/2018	68
2016/2017	45
2015/2016	76
2014/2015	138
Total 2014–24	485

Figure 9: Housing completions (net additional dwellings) 2014 – 2024 in Saxmundham parish. Source: East Suffolk Council Planning Policy and Delivery monitoring records. Information obtained 06.09.2024.

2.6 Data from the 2021 Census shows that there were 2,176 households in Saxmundham parish. This is an increase in households of 25.4% from 1,623 households in the 2011 Census.

Saxmundham parish Tenure	Census 2021 number	Census 2021 percentage
All Categories	2,169	100%
Owned or shared ownership	1,306	60.21%
Social rented	526	24.25%
Private rented or lives rent free	337	15.54%

Figure 10: Tenure of households in Saxmundham parish from the 2021 Census.

2.7 The table below shows Saxmundham parish household composition data from the 2011 and 2021 Census. There is an increase in one person households and a decrease in one family households between the 2011 and 2021 Census. Saxmundham parish has a higher percentage of one person households compared to East Suffolk and Suffolk..

Household Composition	Saxmundham Census 2011 percentage	Saxmundham Census 2021 percentage	East Suffolk district Census 2021 percentage	Suffolk Census 2021 percentage
All Categories	100%	100%	100%	100%
One person household	32.6%	35.9%	32.3%	31.2%
One family household	64.2%	60.6%	63.8%	64.4%
Other household types	3.2%	3.5%	3.9%	4.5%

Figure 11: Table showing household composition from the 2011 and 2021 Census for Saxmundham parish, East Suffolk and Suffolk. Source: Nomis website. Information obtained 10.09.2024

Health

2.8 The following table shows how the population reported their general health in

the 2021 Census.

General Health Census 2021	Saxmundham parish percentage	East Suffolk district percentage	Suffolk Percentage
Very good health	43.5%	43.3%	45.6%
Good health	36.6%	36.0%	35.8%
Fair health	14.6%	15.0%	13.6%
Bad health	4.0%	4.5%	3.9%
Very bad health	1.4%	1.2%	1.0%

Figure 12: Table showing general health reported by the population of Saxmundham parish, East Suffolk district and Suffolk in the Census 2021. Source: Nomis website. Information obtained 10.09.2024.

2.9 The table below shows Disability reported by all usual residents of Saxmundham parish, East Suffolk district and Suffolk in the 2021 Census. The percentage of residents who are disabled under the Equality Act is slightly higher in Saxmundham parish compared to East Suffolk and Suffolk.

Disability Census 2021	Saxmundham parish percentage	East Suffolk district percentage	Suffolk percentage
Total	100%	100%	100%
Disabled under the Equality Act	21.1%	20.6%	18.3%
Not disabled under the Equality Act	78.9%	79.4%	81.7%

Figure 13 above: Table showing disability reported by all usual residents of Saxmundham parish, East Suffolk district and Suffolk in the 2021 Census. Source: Nomis website. Information obtained 10.09.2024.

Educational attainment

2.10 Census 2021 data indicates that 18.1% of people in Saxmundham parish aged 16 and over have no qualifications which has reduced from 25 % in 2011. This compares to 19.4% for East Suffolk and 19.7% for Suffolk.

Employment

2.11 Data from the 2021 Census shows that 52.7% of residents aged 16 years and over in Saxmundham parish are economically active and in employment including full time students. This is slightly higher than the percentage for East Suffolk district, and lower than the percentage for Suffolk.

Economic Activity Status	Saxmundham percentage	East Suffolk percentage	Suffolk percentage
Total	100%	100%	100%
Economically active: In employment (including full time students)	52.7%	51.5%	56.5%
Economically active: Unemployed (including full time students)	2.5%	2.6%	2.7%
Economically inactive	44.8%	45.9%	40.9%

Figure 14 above Saxmundham parish Economic Activity Census 2021. Source: Nomis website. Information obtained 09.09.2024).

2.12 Data from Census 2021 in respect of the occupations of all usual residents aged 16 years and over in employment is shown in the table below.

Occupation (current)	Saxmundham parish percentage	East Suffolk percentage	Suffolk percentage
Total: All usual residents aged 16 years and over in employment the week before the Census.	100%	100%	100%
1. Managers, directors and senior officials	12.5%	13%	12.6%
2. Professional occupations	14.1%	15.9%	16.7%
3. Associate professional and technical occupations	12.3%	12.5%	13.1%

Occupation (current)	Saxmundham parish percentage	East Suffolk percentage	Suffolk percentage
4. Administrative and secretarial occupations	8.9%	9.5%	9.4%
5. Skilled trades occupations	13.2%	12.5%	12.2%
6. Caring, leisure and other service occupations	12.5%	10.6%	10.1%
7. Sales and customer service occupations	8.1%	8%	7.6%
8. Process, plant and machine operatives	6.6%	7.7%	7.7%
9. Elementary occupations	11.7%	10.3%	10.6%

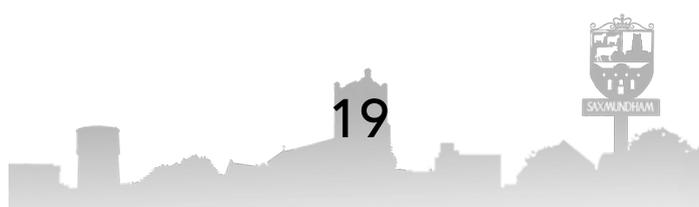
Figure 15 above: Table showing Census 2021 Occupation data for Saxmundham parish, East Suffolk district and Suffolk. Source: Nomis website. Information obtained 10.09.2024.

2.13 Data from the 2021 Census shows the industries in which Saxmundham parish residents are employed. The highest percentage of residents are employed in public administration, education and health, followed by distribution, hotels and restaurants.

2.14 Saxmundham residents do not travel long distances for work. The highest proportion of residents of Saxmundham parish travel less than 10km to work, followed by working from home.

Deprivation levels

2.15 The 2021 Census reports that 46.9% of Saxmundham residents are not deprived using any of the deprivation indicators and a further 34% are deprived when scored against one indicator. These figures are almost identical to those for East Suffolk as whole and the area is not seen as particularly deprived.



The local economy – jobs, businesses and shops

- 2.16 A survey³ conducted for East Suffolk Council in 2019 found that there were 79 businesses operating in the town centre of which 43 were retail, including 2 national chain supermarkets. There were 12 food and drink establishments ranging from the Bell Hotel to restaurants, cafes, and takeaways. Seven businesses fall into the financial and professional services sector. There is a bank in the town centre. Although still relatively small, there is also a growing arts-connected sector plus galleries.
- 2.17 Within the rest of the town there are a number of small businesses, including garages, a care company, accountancy, hardware and engineering and carpet shops. There are numerous small businesses operating from residential properties. Just outside the plan area, Carlton Park Industrial Estate is home to a range of businesses providing employment and services for the town and wider area.
- 2.18 Despite its rural location and proximity to the coast, the town does not have a significant tourism economy. In Spring 2021, there were 11 properties in the town which were marketed as holiday lets, but there may well be more let on an informal basis. Camping and Caravan sites are located just outside the town, although within the Neighbourhood Plan Area. Farming, which used to be a bedrock of the town, now employs a mere 3 per cent.

Transport, movement and access

- 2.19 The town is by-passed by the A12. The former A12, now the B1121, runs through the town from north to south and intersects in the centre of the town with the B1119 to Framlingham (west) and Leiston (east), together they form the basis of the road network. The High Street section of the B1121 is very narrow at its northern point causing congestion at times and making servicing of the shops difficult. It is also particularly dangerous for cyclists and pedestrians. The whole length of the High Street is characterised by narrow and uneven pavements. There is a traffic light-controlled junction with the Leiston Road (at Church Street). This junction is heavily used as it gives access to the two supermarkets on Church Street and at busy times of the day it can become

³ 'Saxmundham, Understanding the Heart of Our Town, Town Centre Baseline Report September 2019', <https://eastsuffolkmeansbusiness.co.uk/wp-content/uploads/2020/02/Saxmundham-Heart-of-Our-Town-Report-September-2019.pdf>



congested. There is a zebra crossing facilitating pedestrian movement between the supermarkets and nearby shops.

- 2.20 The B1119 snakes its way through residential areas of the town and does not provide a clear east- west route, to the confusion of visitors to the town. In practice, much of the east-west-bound traffic uses the traffic-light controlled junction with the B1121 to use Chantry Road (very narrow at the junction) as the main route to or from the west. The railway station, although centrally situated in the town, has been described as 'geographically challenged'. The access routes, Station Approach, New Cut and Albion Street, are very narrow and involve tight turns making it difficult for larger vehicles and buses which need to serve the station.
- 2.21 Cycling is challenging in and into the centre of town mainly because of narrow roads, absence of earmarked routes, parked cars and heavy traffic at times. There are cycle racks at the supermarkets, the station and at the north end of the High Street. Cycling out of the centre towards the surrounding villages is dangerous because of fast traffic and a lack of dedicated cycle lanes or cycle tracks.
- 2.22 In general, the pavements in the older parts of the town are very narrow and walking two abreast is not possible, this is a particular problem in the centre of town where there is more pedestrian movement and where more space is needed for people to be able to interact socially. Those with mobility issues are also disadvantaged by the narrow and often uneven pavements.
- 2.23 Outside the town there are public footpaths and other Public Rights of Way, out into the countryside, these are mainly to the west and involve crossing the A12, which is hazardous, given the speed of traffic. The parish also features in the East Suffolk Line Walks, a series of promoted long-distance trails between railway stations between Ipswich and Lowestoft.
- 2.24 The town has a central car park with long stay spaces and short stay free spaces and disabled spaces; it operates a pay and display charging system. The two supermarkets have car parks; both operate on the basis of free parking for the first 2 hours. There is free short stay on-street parking in the Market Place and at the north end of the High Street. The station has a pay and display car park for railway users only.



Social, cultural, community and leisure

- 2.25 The largest meeting place and events venue in the town is the Market Hall which can seat 200. The Fromus Centre has relocated to Street Farm Road and has become the main community centre. In addition, the Gannon Rooms, the Old Bank and the two church halls are used for a variety of leisure and social groups. The Social Club is a meeting place for its members. Informal socialising takes place in the cafes and bars in the town.
- 2.26 The Museum and the Library are important to the cultural life of the town. The Art Station, housed in two town centre locations, including the former telephone exchange, is developing as a significant local centre for the arts and creative industries.
- 2.27 The town now only has a primary school. The primary school is close to capacity in terms of pupil numbers. The secondary school closed in 2024 and the future of the site is yet to be determined.
- 2.28 Medical services are provided by the GP surgery, a dentist, an optician, and the pharmacy. There are several residential homes for the elderly, a sheltered housing complex and mental health services.
- 2.29 Leisure activities are provided by a large number of clubs and societies. Outdoor sport takes place at Carlton Park. The Memorial Field includes a skate park and there are several children's playgrounds around the town.



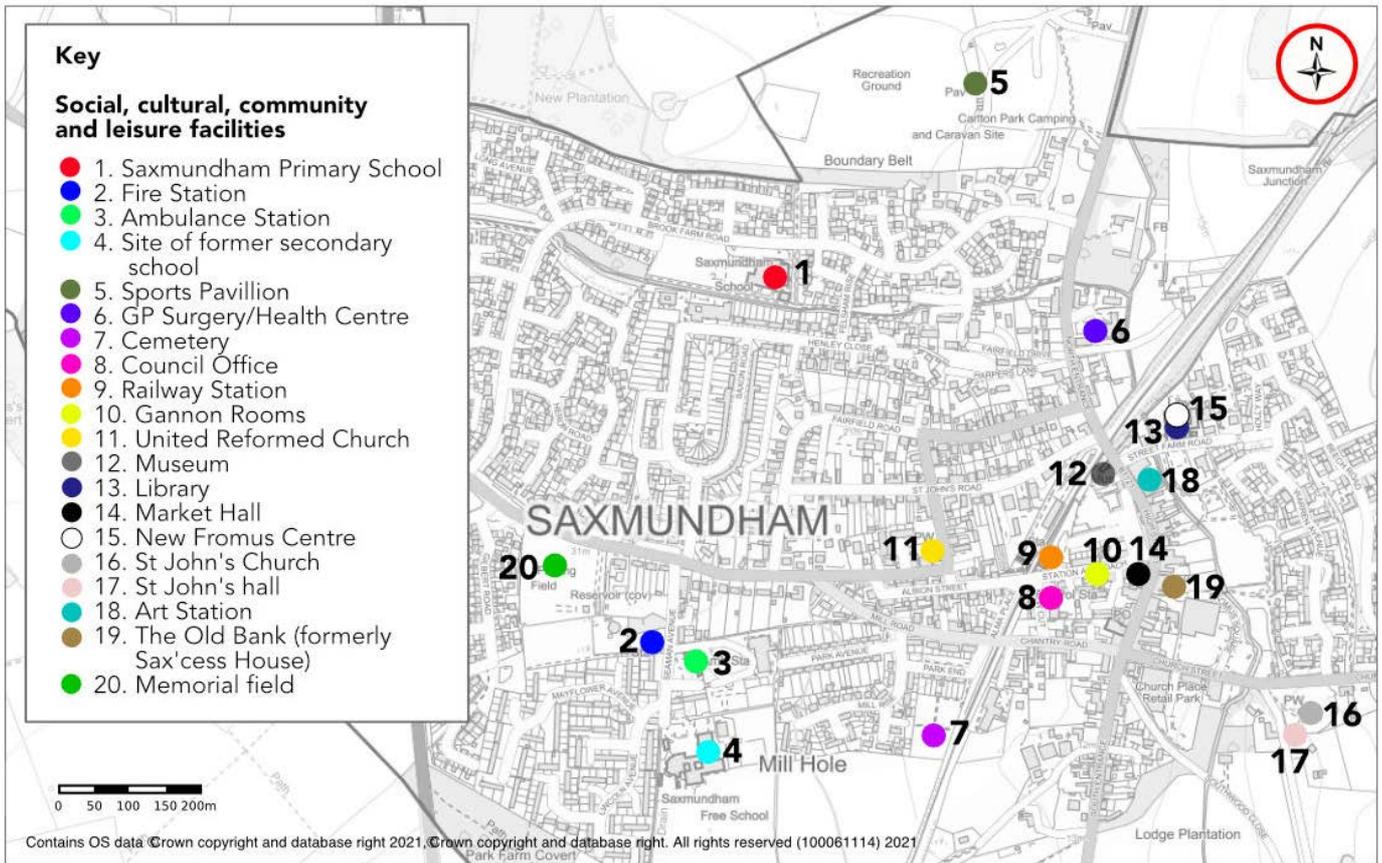


Figure 16: Location of social, cultural, community and leisure facilities (source: parish online, with own annotations).

Built heritage

2.30 The town originally grew up to the west of the River Fromus and developed in a linear form along the turnpike, which was the main road from London to Lowestoft. The town was granted a market in 1272, signifying its importance as a market town serving the surrounding agricultural and rural area, a function which it still fulfils. The buildings in the centre of town are mainly 16th, 17th and 18th century. With the coming of the railway the town expanded westwards largely in the form of typical Victorian brick-built terraces. The construction of the by-pass in the 1980s has led to large scale residential development between the existing town and the by-pass. More recent development has extended the town eastwards to the skyline.

2.31 The approach to the town from the south along the B1121 is spacious, it is flanked by The Layers to the west and Hurts Hall Park to the east with views across to Hurts Hall itself and the church. The town sits below the rising land to the east. The approach from the north is wooded and enclosed and opens out

on arrival at the built-up area. Approaching on the B1119 Leiston Road from the east, the town is not visible until the boundary when the road dips down towards the Fromus, and there are glimpses of the roofs of the town ahead. From the west the approach from the by-pass is unremarkable.

2.32 Saxmundham Conservation Area covers the historic heart of the town and includes most of the land between the River Fromus and the railway and extends north of the railway bridge to include Fairfield House and Langley Manor. Saxmundham boasts 50 listed buildings, most of which are in the town centre. St John's Church is listed grade II* as is The Beeches at 5, North Entrance.



Figure 17: Saxmundham Conservation Area (source: East Suffolk Council, Saxmundham Conservation Area Appraisal, March 2016).

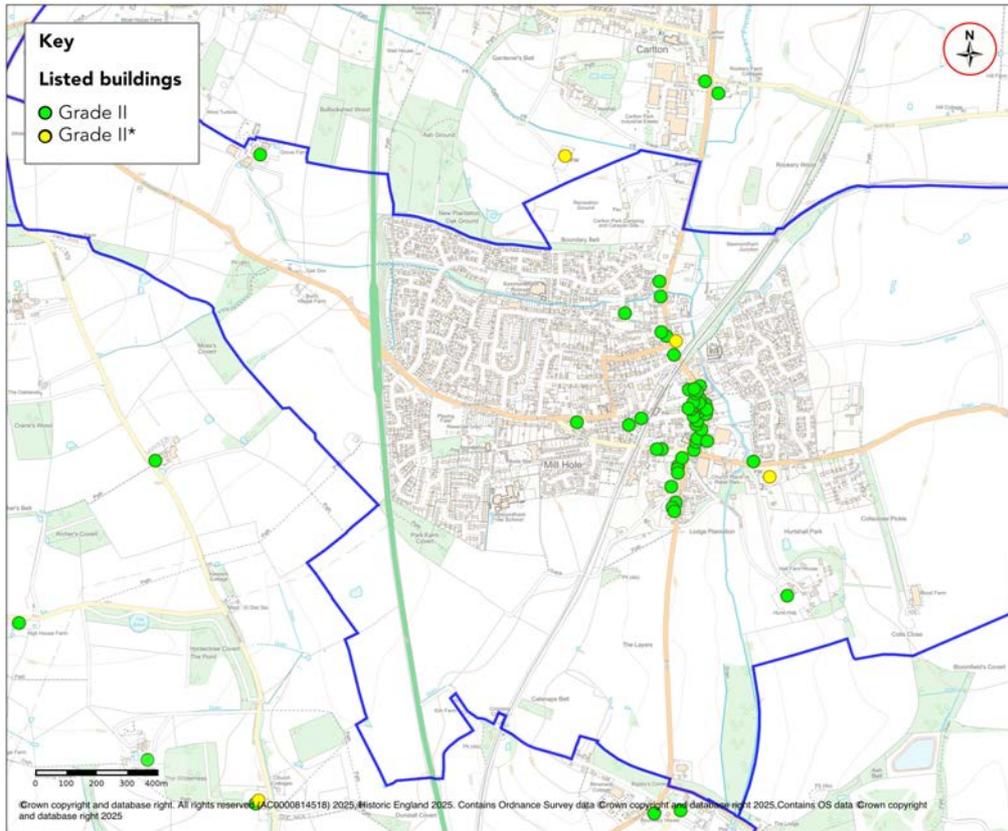


Figure 18 below: Listed buildings in Saxmundham parish (source: Parish Online, with own annotations). Blue line denotes parish boundary

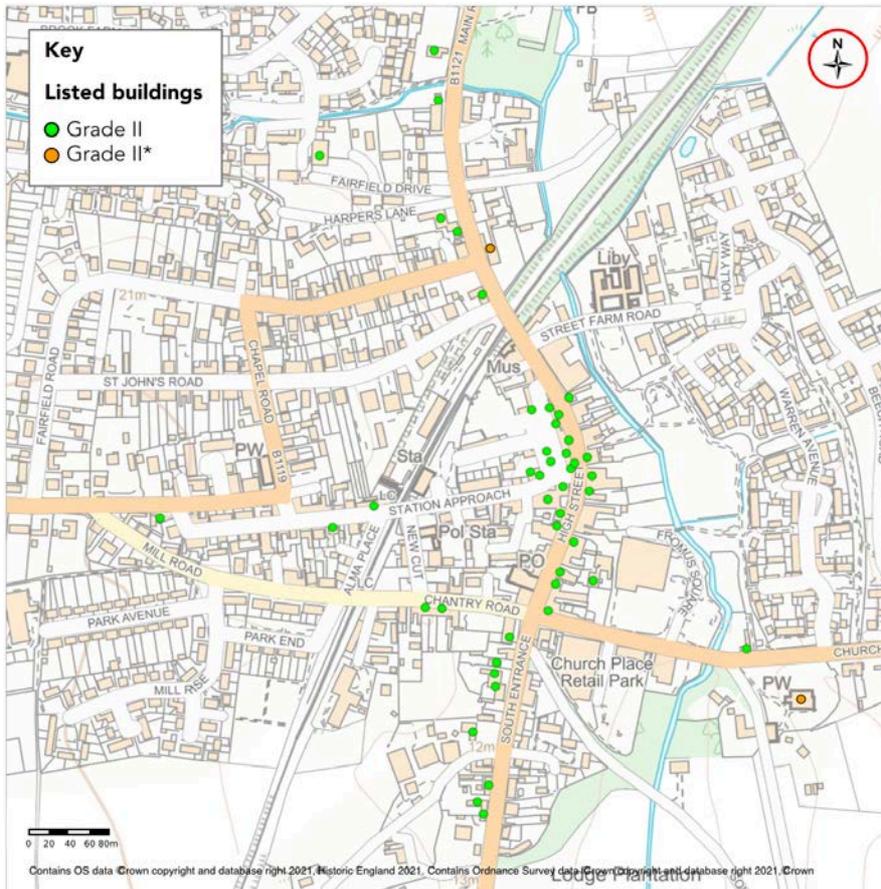


Figure 19: Listed buildings in Saxmundham town centre (source: Parish Online, with own annotations).

Archaeology

2.33 Information on the archaeology within the parish is held within the County held Historic Environment Record (HER), which is maintained by the Suffolk County Council Archaeological Service (SCCAS). Of particular note have been the archaeological investigations at Land East of Warren Hill, Saxmundham which revealed evidence of Bronze Age, Iron Age and Saxon settlement. The archaeological evidence recorded included a significant phase of Saxon activity which included a large rectangular post-build structure representing a hall, two additional post-built structures and nine sunken feature buildings. Furthermore, evidence for Late Neolithic and Early Bronze Age occupation and further Iron age and Saxon settlement has also been identified in the vicinity. Further information on the archaeology of the parish can found on the Suffolk Heritage Explorer.⁴

Natural environment and green spaces

2.34 There are no designated nature conservation sites within the parish, however the parish is in relatively close proximity to the extremely sensitive Sandlings, Alde-Ore and Minsmere-Walberswick Special Protection Areas (SPAs). Saxmundham is situated in an area which has several road links to areas of open countryside and the coast. However, it only has a few open green spaces in the town centre and several smaller green spaces that create an open setting within the more recently developed housing estates. There are also footpath links to Carlton Park to the north which, although not wholly within the boundary of Saxmundham, is used by its residents. With the planned expansion of the town, it is necessary to safeguard existing green space and increase it for the benefit of the community.

⁴ <https://heritage.suffolk.gov.uk/>





3. How the Plan was prepared

- 3.1 The Modified Neighbourhood Plan has been prepared by a Steering Group consisting of a mix of Town Councillors and local residents. Many of the Steering Group members had been involved with the preparation of the 'Made' Neighbourhood Plan and were therefore familiar with the process. The Steering Group were supported by a small team of independent consultants. The process of the review began in August 2024.
- 3.2 The Neighbourhood Plan Review is commissioned by Saxmundham Town Council. The funding for its production has come from a central government Locality grant and the Town Council's own funding.

Community engagement and consultation

- 3.3 The original Neighbourhood Plan was prepared following considerable community engagement, details of which was set out in the Consultation Statement which accompanied it. The process employed for this Modified Neighbourhood Plan has been shorter than that for the original Neighbourhood Plan which is consistent with its more focused scope. The key issues of the Garden Neighbourhood and the Energy Infrastructure Projects were identified at an early stage by the Town Council and the community.
- 3.4 It should be noted that the Garden Neighbourhood was a significant issue for the made Neighbourhood Plan and that the Submission draft of the Neighbourhood Plan contained specific policies for the Garden Neighbourhood which were removed in part by the Examiner as they related to land which was then outside of the Neighbourhood Area. These had been the subject of considerable public consultation both with stakeholders and the local community. This Modified Neighbourhood Plan draws heavily on that original work.

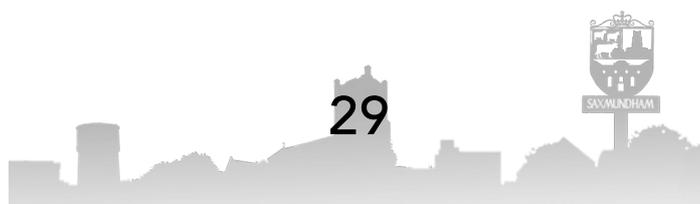
Communication

- 3.5 Communicating with local residents and businesses has been a key consideration particularly as the Adopted Neighbourhood Plan is relatively recent. It has been important to explain to the community that the purpose of the Modified Neighbourhood Plan is to ensure that there are effective and



clear planning policies guiding the development of the Garden Neighbourhood and opportunities for mitigating the impacts of the Energy Infrastructure Projects affecting the parish.

- 3.6 The Garden Neighbourhood is expected to be delivered during the Neighbourhood Plan period and there has been engagement with the Neighbourhood Plan Steering Group, the community and the Town Council by the promoters of the site. Further engagement in the production of the required Masterplan is expected to continue. The challenge for the Modified Neighbourhood Plan is to effectively communicate that it is seeking to manage the development of the site to gain maximum benefits for the community and is not a mechanism for stopping or preventing the development of the site, the principle of which was established through the Local Plan allocation. There have been regular updates on the progress of the Modified Neighbourhood Plan to Town Council meetings, the Neighbourhood Plan Facebook Page and articles in the local press.
- 3.7 The Pre-Submission consultation on the Modified Neighbourhood Plan took place between 27th June and 15th August. The consultation was launched with two drop-in style exhibitions held at the Market Hall on Friday 27th June (between 4pm and 8pm) and Saturday 28th June (between 10am and 2pm). A physical copy of the Plan was available in the Saxmundham Library and the Town Council offices. A weblink to the Neighbourhood Plan and supporting documents was also sent to the prescribed statutory consultees and a wide range of local organisations. More details are set out in the Consultation Statement.



EAST ANGLIAN
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EAST ANGLIAN
DAILY TIMES

**S' MUNDHAM:
TOWN'S
FUTURE IN
SPOTLIGHT**

WEDNESDAY



4. Vision and objectives

A Vision for Saxmundham (to 2036)

4.1 The vision for the Modified Neighbourhood Plan remains the same as that in the made Neighbourhood Plan and is set out below.

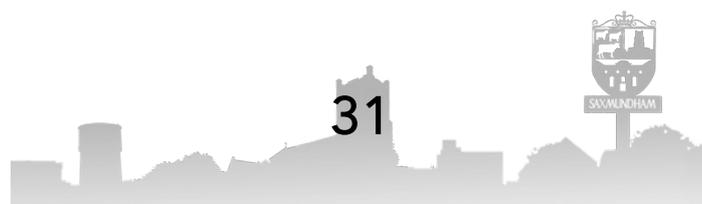
VISION 2036

A thriving and prosperous town

- which acts as a key service centre and transport hub for the town and surrounding area
- with the physical and community infrastructure to support growth
- with new and varied employment opportunities, including in new and growing sectors, which take advantage of the connections offered by rail and the A12
- with a vibrant and viable town centre and a bustling weekly market, with strong retail, cultural, energy and hospitality sectors
- and adequate and convenient parking provision.

A safe and healthy town

- with good social, cultural and leisure provision contributing to the health and wellbeing of all ages
- with well used green open spaces and an enhanced network of green infrastructure providing access to nature and improvements to biodiversity
- with ease of movement throughout the town
- with safe routes for pedestrians and cyclists
- with good quality housing which meets the current and future needs of residents
- enjoying enhanced medical and educational facilities, which support healthy lifestyles
- where services and employment choices are local.



An attractive and distinctive town

- which is friendly and inclusive
- where new and existing development is successfully integrated forming a holistic and sustainable community
- which has a strong, wide-ranging cultural identity with well-equipped public venues and programmes of events and activities
- with a well maintained and valued historic town centre, enjoyed by visitors and residents alike.

4.2 The vision is underpinned by the objectives and policies of the Saxmundham Neighbourhood Plan and is referred to throughout.

4.3 From the vision flow the different objectives of the Neighbourhood Plan and from there, the policies. The diagram below outlines this relationship.



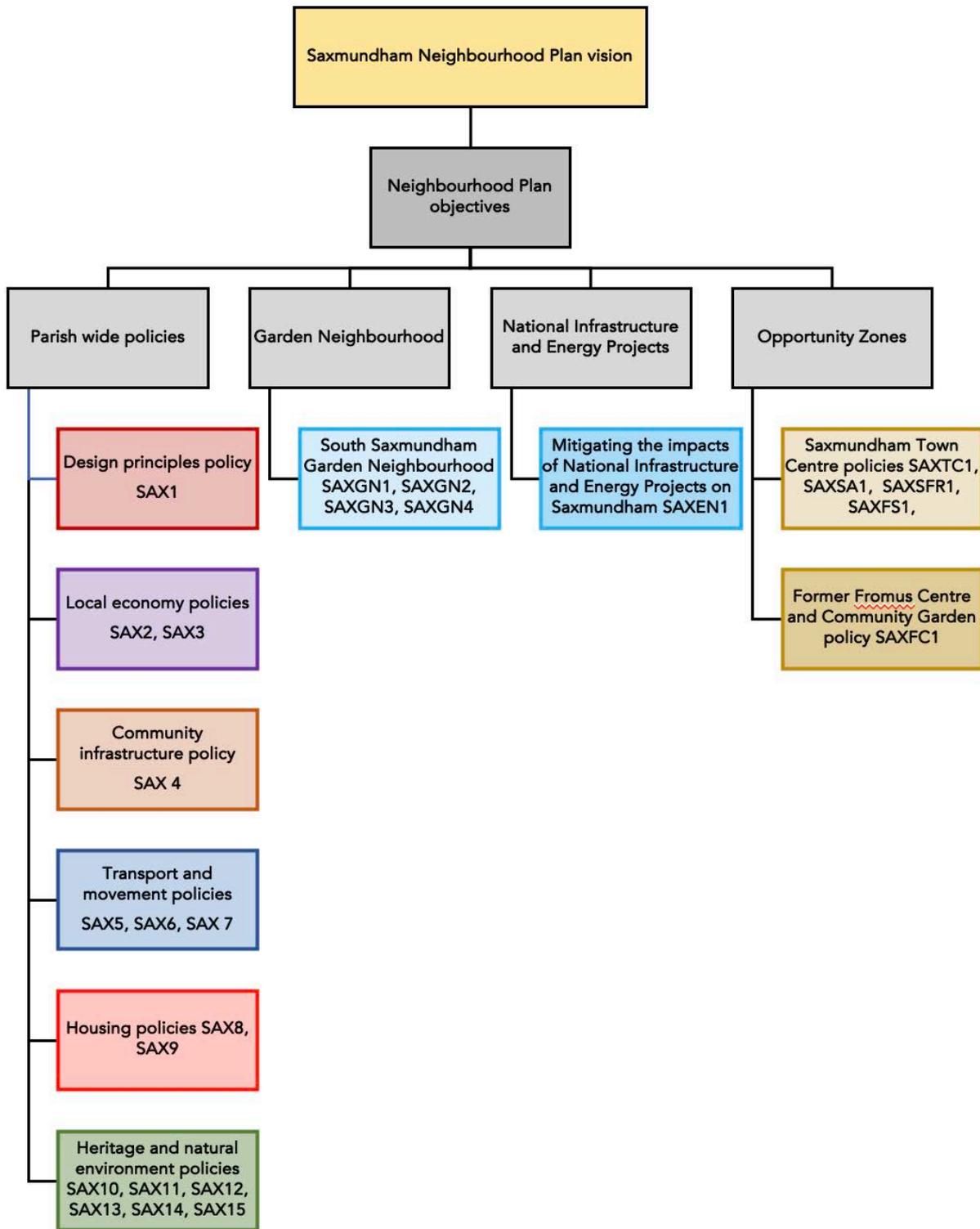


Figure 20: Structure of the Saxmundham Neighbourhood Plan

4.4 The objectives of the Neighbourhood Plan are broad statements of intent which are there to help deliver the vision and link to the issues that Saxmundham is seeking to address. They have been drafted using themes

picked up at an early stage and have been refined through the community consultation exercises. The Neighbourhood Plan Review adds new objectives relating to the Garden Neighbourhood and to Energy Infrastructure Projects.

Area wide Objectives

Objective 1: To promote a strong and diverse forward looking, local economy, building upon the town's advantages as a service centre market town with a strategic location.

Objective 2: To secure for the community of Saxmundham a full range of physical and community infrastructure to meet the growing needs of the town and its environs.

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.

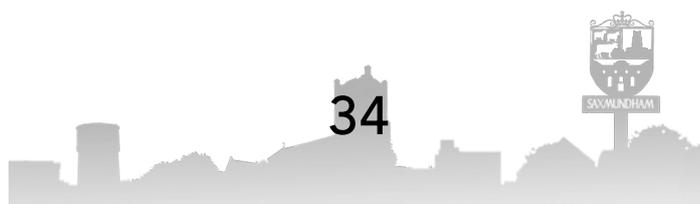
Objective 4: To promote the development of high quality, energy efficient housing to meet the needs of the people of Saxmundham.

Objective 5: To protect and enhance the Conservation Area, the town's heritage, green spaces, natural features and rural setting, and to address the challenges of climate change.

South Saxmundham Garden Neighbourhood

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

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



National Infrastructure and Energy Projects

Objective EN1: To ensure that the necessary measures required to mitigate the physical, visual and social impacts of National Infrastructure and Energy Projects on Saxmundham are identified and implemented.

Opportunity Zone Objectives: Saxmundham town centre (including High Street, station area, Street Farm Road and Fromus Square)

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.

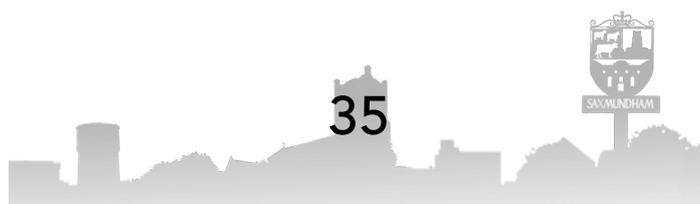
Objective STC2: To reduce the non-essential use of the High Street by motor vehicles and to prioritise pedestrian movement and safety in the centre, whilst improving and encouraging parking provision in accessible locations within walking distance of the town centre.

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

Objective STC4: To support the economic and environmental regeneration of the station area via a masterplan led approach, which encourages mixed-use development of underused and derelict land, and improves the attractiveness of Station Approach as a route for pedestrians and cyclists.

Opportunity Zone Objectives: The former Fromus Centre and Community Garden

Objective FFC1: To support a high-quality development for specialist and other housing purposes including community use, which safeguards the community garden, and offers improved pedestrian access to, and permeability within, the site.

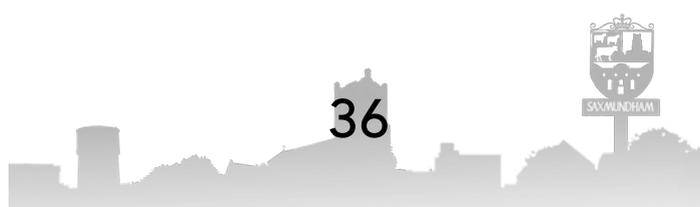


5. Planning policies

Introduction to policies

- 5.1 The vision and objectives have provided the framework to develop the policies in the Modified Neighbourhood Plan. Each policy relates to a particular objective under the following five area wide themes: the local economy; community, social and recreation provision; transport and movement; housing and heritage; and the natural environment. In addition, there are zonal policies for the identified Opportunity Zones, for the town centre, station area, Street Farm Road, Fromus Square and the former Fromus Centre. The Opportunity Zones are not intended to be site specific allocations but indicative areas within which specific proposals and actions will be encouraged. The Modified Neighbourhood Plan adds specific policies relating to the South Saxmundham Garden Neighbourhood and for mitigating the impacts of proposed Major Energy Related Infrastructure projects.
- 5.2 The Neighbourhood Plan is first and foremost a land-use document for planning purposes. All policies in the Plan have been derived from a series of consultation exercises, stakeholder engagement and desk research, which provide the justification and evidence base for their selection.
- 5.3 The Neighbourhood Plan policies follow the government's guidance. They exist to:
- Set out locally led requirements in advance for new development in the parish.
 - Inform and guide decisions on planning applications.
 - Ensure that the multitude of individual decisions add up to something coherent for the area as a whole⁵.
- 5.4 To aid interpretation for decision makers and planning applicants, each policy is accompanied by supporting text, which includes context for the theme, the views of residents, guidelines and reference to strategic plans. This is set out before each of the policies.

⁵ Tony Burton, Writing Planning Policies, Locality.



Saxmundham Neighbourhood Plan policies

Parish wide: **Design principles**

SAX1: General design principles

Parish wide: **Local economy**

SAX2: Expansion of existing businesses

SAX3: New businesses

Parish wide: **Community infrastructure**

SAX4: New community facilities

Parish wide: **Transport and movement**

SAX5: Improving connectivity

SAX6: Public rights of way

SAX7: Parking provision

Parish wide: **Housing**

SAX8: Windfall and Infill development

SAX9: Tenure blind Housing Development

Parish wide: **Heritage and natural environment**

SAX10: Historic town centre and Conservation Area

SAX11: Non-designated Heritage Assets

SAX12: Gateways, views and landscape setting of Saxmundham

SAX13: Protection and enhancement of natural assets

SAX14: Community gardens and allotments

SAX15: Protection of existing Local Green Spaces

South Saxmundham Garden Neighbourhood

SAXGN1: Connecting the Garden Neighbourhood

SAXGN2: Green infrastructure

SAXGN3: Community Facilities

SAXGN4: Design of the Garden Neighbourhood

Mitigating the impacts of National Infrastructure and Energy Projects

SAXEN1: Addressing and mitigating the impacts of large scale energy projects

Opportunity Zone: Saxmundham town centre

SAXTC1: Town centre overarching strategy

SAXSA1: Station area

SAXSFR1: Development and environmental enhancement opportunities at Street Farm Road
SAXFS1: Fromus Square

Opportunity Zone: Former Fromus Centre and Community Garden

SAXFC1: Former Fromus Centre site and Community Garden



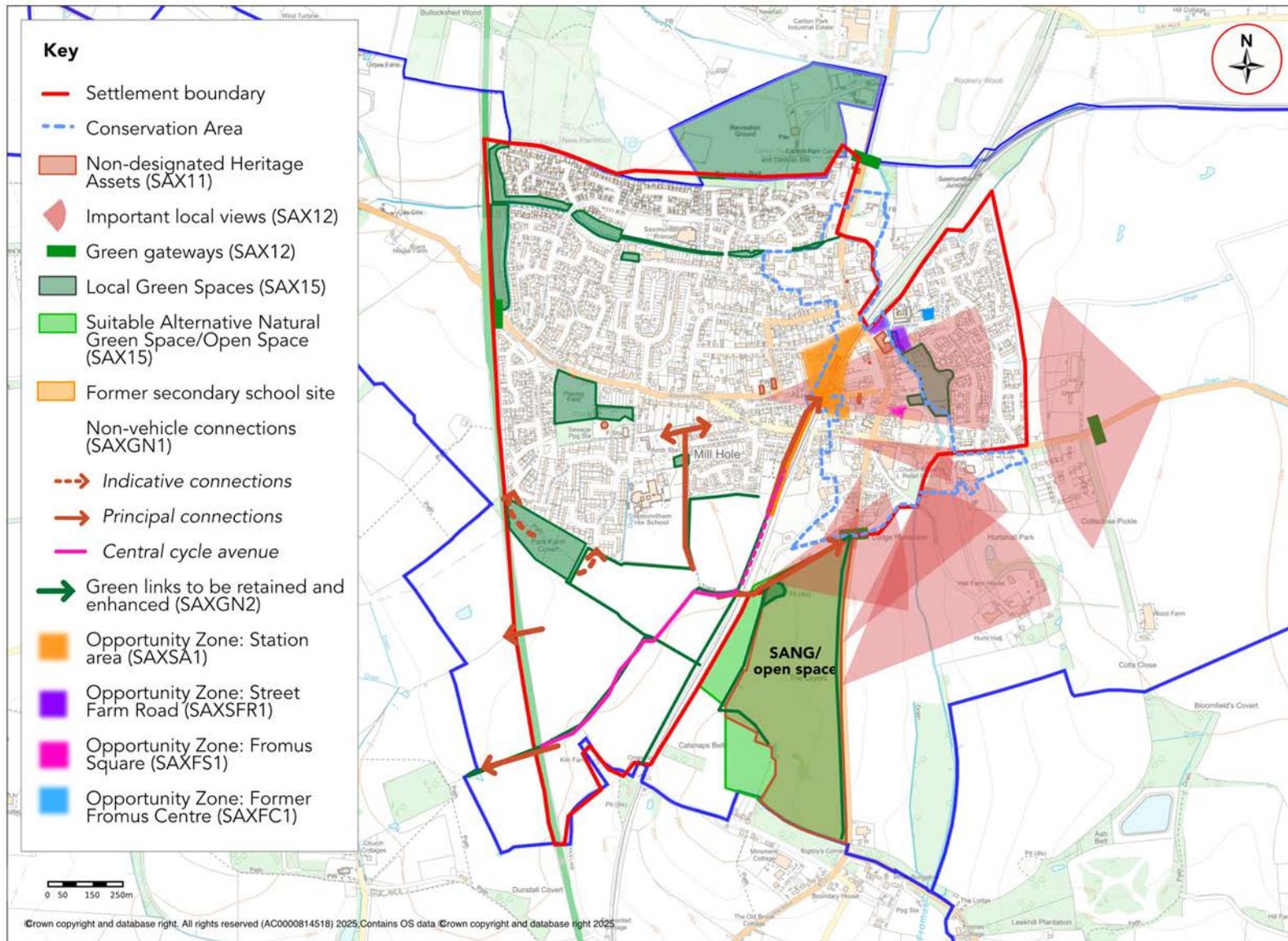


Figure 21: Composite policies map (source: Parish Online, with own annotations). Please refer to individual policy maps for more detail.





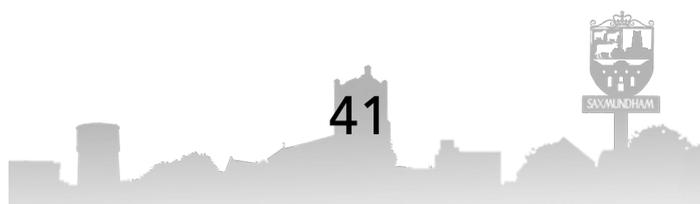
6. Parish wide: Design principles

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 December 2024. Paragraph 131 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 132 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 for the Neighbourhood Plan Area to support the made Neighbourhood Plan. This work was completed in July 2021 and is contained



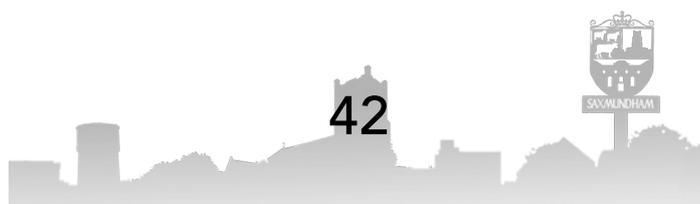
in **Appendix E** of this Modified Neighbourhood Plan. The Design Code reflected a detailed analysis of the local character of the parish, developed some strategic design guidelines and identified a palette of materials which should influence the design of future development. The Code's principles have informed and are reflected in **Policy SAX1**, and its more detailed guidance should be drawn upon as appropriate in the design of future development, throughout the Neighbourhood Plan area. 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 22: Design Guidelines and Codes for the Neighbourhood Plan area (Appendix E).



- 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.⁶
- 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

⁶ RTPi | Dementia and Town Planning: <https://www.rtpi.org.uk/practice/2020/september/dementia-and-town-planning/>

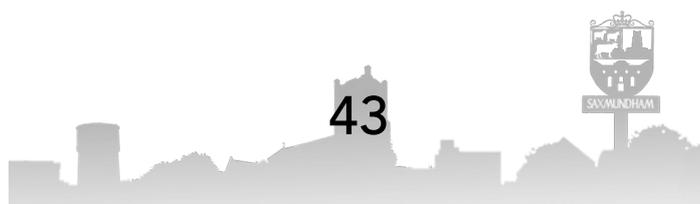


section, recognising that good design should be a theme that flows throughout the plan, and sets the tone for other policies to follow in terms of its importance for all new development of any scale, form or use. **Policy SAX1** below applies throughout the amended Neighbourhood Area.

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

6.14 The criteria in the policy below are informed by the **Saxmundham Design Guidelines and Codes for 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. It should be noted that the General Design Principles identified in **Policy SAX1** below apply throughout the Neighbourhood Area including the area of the proposed South Saxmundham Garden Neighbourhood located within the extended Neighbourhood Area. More detailed design guidance for the development of the Garden Neighbourhood is contained in Chapter 12.



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 for the Neighbourhood Plan area as set out in **Appendix E**.

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 SAX10** which relate to the Conservation Area and **SAXGN4** which relates to the Garden Neighbourhood.





7. Parish wide: Local economy

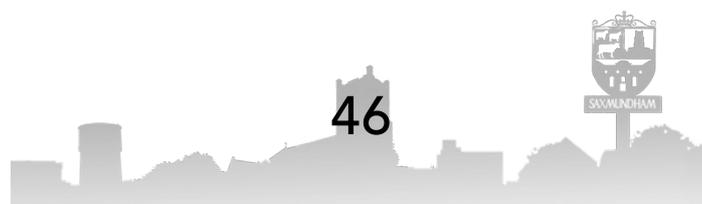
Objective 1: To promote a strong and diverse local economy, building upon the town's advantages as a service centre market town with a strategic location.

Employment in Saxmundham

- 7.1 The National Planning Policy Framework (NPPF) states that planning policies and decisions should help create the conditions in which businesses can expand and invest and adapt. Weight should be given to the need to support economic growth and productivity taking into account local business needs. In rural areas planning policies should enable the sustainable growth of all types of business both through the conversion of existing buildings and well-designed new buildings. The use of previously developed land and sites that are well related physically to existing settlement should be encouraged.
- 7.2 The Local Plan indicates that employment opportunities are limited in the town and that there is a high level of net out commuting for employment. A range of employment sites exist in close proximity to Saxmundham, but a significant proportion of residents travel for employment to locations such as Ipswich, Martlesham, Leiston and Lowestoft. Policy SCLP12.28 of the Local Plan which contains the Strategy for the town also refers to the need to diversify and expand employment opportunities.
- 7.3 The creation of the South Saxmundham Garden Neighbourhood will provide new opportunities for employment in the area, including in the employment area to the west of the A12, which was previously outside of the parish

boundary. It will be important to ensure that this significant new site offers opportunities for new employment and does not have adverse impacts on the town centre economy. Its design and uses should be compatible with its inclusion within the Garden Neighbourhood.

- 7.4 The largest identified employment site is located just outside the Neighbourhood Area to the north of the town in the parish of Kelsale-cum-Carlton. This may be the reason that employment as an issue did not feature particularly strongly in the results of the Household Survey, where most comments relating to jobs and business tended to refer to the town centre. However, a strong theme was the need to do more for younger people in the town both in terms of employment and training opportunities but also social and recreational provision. The area known as the Carlton Industrial Estate (SCLP12:36) is expanding with planning consents already permitted or recently approved for an additional 97,000 square feet/ 9012 square metres which equals approximately 150-160 jobs for the local area. The site consists of a range of uses and sizes. Given the connectivity of the site with access to and from Saxmundham this development is expected to make a positive impact on employment in Saxmundham.
- 7.5 The Neighbourhood Plan also does not propose to make any traditional additional allocations for employment or business uses but where proposals for such uses as identified above come forward, they would be encouraged to existing areas insofar as room is available. The locational focus for new employment generation for the Neighbourhood Plan will be the existing built-up area of the town, the town centre and specific locations where there are areas of unused or underused land that lend themselves to commercial and mixed developments such as the station area or Street Farm Road (see also the **Opportunity Zones policies**).
- 7.6 In addition the Neighbourhood Plan will support the appropriate expansion of existing businesses, particularly where such proposals will strengthen the economy of the town either by retaining or increasing the number of jobs, where they increase the overall vitality and viability of the town and where they provide sustainable jobs and skills for younger people.



POLICY	<p>SAX2: Expansion of existing businesses</p> <p>Proposals for the expansion or intensification of existing businesses (including otherwise acceptable changes of use) especially those which retain or increase the number of jobs, and provide skills development particularly those for young people will be permitted where:</p> <ol style="list-style-type: none"> a. They strengthen the economy of the town, particularly the town centre and station area, and b. They do not have a significant adverse impact upon the character of the area or the amenity of local residents, for example, through their design, impact upon amenity or highway safety issues caused by traffic generated.
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New business

- 7.7 The Local Plan policies provide a clear steer on the need to diversify and expand the existing employment base in the town for the benefit of its existing young people but also the resident population more generally.
- 7.8 Consideration has been given to the potential for attracting new sectors of business e.g. the energy sector which already has a presence in the area thus broadening the employment base of the town and to building on those industries that already have a presence in the town but would benefit the town by increasing their impact (e.g. the growing arts/digital sector or specialist retail).
- 7.9 Successive revisions to the Town and Country Planning (Use Classes) Order 1987 (as amended⁷ during 2019 and 2020, have meant that planning permission is no longer required to move from certain uses to others, such as employment uses to retail, or offices to houses, thereby resulting in a more limited scope for this area of planning policy.
- 7.10 The desire still exists to ensure that settlements that act as a focus for their surrounding rural hinterland and serve a key role in meeting the needs of its residents can still provide the range and depth of employment, cultural and retail opportunities that will enable them to continue to be attractive places to live and work and to thrive economically into the future. Therefore the

⁷ The Town and Country Planning (Use Classes) Order 1987, <https://www.legislation.gov.uk/uksi/1987/764/contents/made>.



Neighbourhood Plan contains the following policies aimed at protecting and retaining existing employment uses insofar as is possible within the framework provided by the Use Classes Order, but also those that enable mixed uses including employment, commercial and housing to come forward on key sites in order to safeguard and diversify the business base of the town and promote opportunities for regeneration and renewal. Support is given for a range of potential employment sectors including those relating to retail, hospitality and creative and cultural industries. The policy expresses a preference for locating new business uses in the Town Centre, re-using brownfield sites, existing or allocated sites before unallocated out of centre or edge of settlement sites will be considered. This is consistent with the approach taken in Adopted Local Plan Policy SCLP4.2.

POLICY

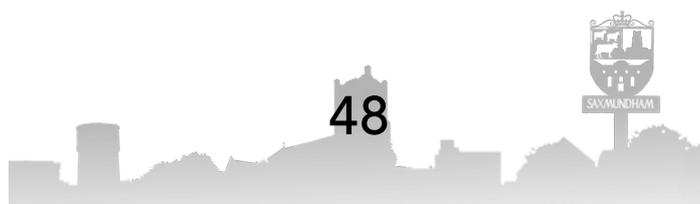
SAX3: New businesses

Development proposals which enable the establishment and growth of new businesses including small and medium sized enterprises particularly those within the following types, will be supported:

- a. Retail and hospitality.
- b. Traditional service industries.
- c. The energy sector (renewable energy, green energy, and carbon neutral energy) and those businesses associated with supporting those sectors.
- d. Creative and cultural industries, including those that combine modern technology and the arts.
- e. Digital industries.
- f. Health, social care, and community support services.⁸

Wherever possible, development proposals for business or mixed uses within the parish should be located in the town centre, the station area, Street Farm Road, or existing or allocated employment sites before out of centre or edge of settlement sites will be considered (see **Opportunity Zone policies**).

⁸ See Appendix D: Glossary for more specific definitions of terms used in criteria a to f.





8. Parish wide: **Community infrastructure**

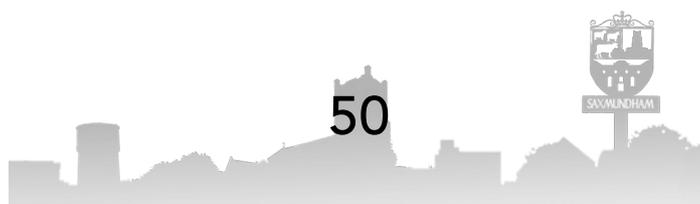
Objective 2: To secure for the community of Saxmundham a full range of physical and community infrastructure to meet the growing needs of the town and its environs.

Vibrant, healthy and integrated communities

- 8.1 The overarching social objective of the planning system as set out in the National Planning Policy Framework is to support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, with accessible services and open spaces that reflect current and future needs and support the health, social and cultural well-being of communities.
- 8.2 In order to achieve this, planning of new development must go hand in hand with planning for the community services and facilities that need to be in place to support development and meet the needs of residents. This includes green infrastructure, sports facilities, local shops, footways and cycleways, public transport, education, library provision, allotments, fire hydrant provision, health services and a range of cultural facilities. These together are often described as 'community infrastructure'. Housing and other development will be expected to contribute towards improving local services and infrastructure through either the payment of a Community Infrastructure Levy (CIL); planning

obligations (via a Section 106 agreement/Section 278 agreement); or use of a planning condition.

- 8.3 The NPPF requires that the levels and types of infrastructure required to support growth should be set out clearly in strategic policies e.g., the Local Plan.
- 8.4 Presently Saxmundham is relatively well served by community infrastructure although there are some elements of fragility and gaps in provision. This infrastructure is also extensively used by the surrounding parishes. There is a primary school, a doctors' surgery, library, dentist, vets, supermarkets, local shops, a bank, garage, restaurants, takeaway restaurants, cafes, bars, pubs, community meeting venues, places of worship, day care facilities, play areas, and car parks. Saxmundham does not, on the other hand, benefit from an indoor sports centre, allotments, cinema etc. so its social infrastructure is more limited than most other towns in the area. However, as the population of the parish increases over the Neighbourhood Plan period, a number of these current services are either at or nearing capacity and will therefore require consideration as to how they will continue to serve the community without a significant decrease in the quality of service they provide. Therefore, with all the proposed growth in the Garden Neighbourhood and the development to the north-east of Street Farm, there will be a need for new, improved, or reconfigured facilities, in order to at least maintain the quality of life for the whole community. This is particularly the case in relation to local GP/medical services given the foreseen level of population increase.
- 8.5 As well as giving consideration to the potential for new community facilities it is important that the existing valued facilities in the town which have served the community over time continue to perform their relevant community function. Such facilities should be safeguarded and protected from development proposals that would lead to their loss or would adversely affect their ability to function as community facilities.
- 8.6 With the majority of future growth in Saxmundham taking place within the South Saxmundham Garden Neighbourhood, some consideration to future community infrastructure requirements has been given at a strategic level. This is covered in more detail in **Chapter 12**.



Community Infrastructure Levy (CIL)

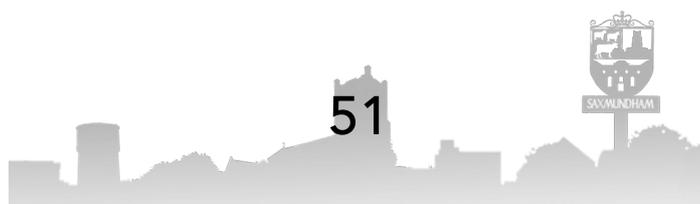
8.7 The Community Infrastructure Levy (CIL) is a planning charge, introduced by the Planning Act 2008, to help deliver in the infrastructure required to support the development of an area. The CIL is levied on practically all new development within a given area. East Suffolk Council has introduced CIL across its administrative area and has an adopted CIL Charging Schedule which sets out the charges levied on various forms of development. East Suffolk is responsible for levying and collecting the CIL payable and they retain 5% of the overall CIL collected in the District to administer the scheme.

8.8 **Neighbourhood CIL** is the percentage of the CIL that is payable to the parish or neighbourhood within which eligible development takes place. At present Saxmundham Town Council receives 25 per cent of the CIL levied on development in the original Neighbourhood Plan area by virtue of being covered by a made Neighbourhood Plan. Currently development in the extended Neighbourhood Area would only generate a 15% levy for the Town Council until this Modified Neighbourhood Plan is formally made and then this will rise to 25%. Saxmundham Town Council regularly reviews its priorities for spending the Neighbourhood CIL. In January 2022, after consultation, the following were agreed by the Town Council for Neighbourhood CIL expenditure on community infrastructure.

- Purpose 1: Improving access from new housing areas to the town centre for pedestrian and cyclists.
- Purpose 2: Enhancing children and young people’s recreational facilities.
- Purpose 3: A more attractive successful town centre to meet the needs of the growing population.
- Purpose 4: Improving community, entertainment, and cultural facilities in the town.
- Purpose 5: Improving facilities for non-fossil fuel modes.
- Purpose 6: Developing new or improving existing open or green spaces for the community.
- Purpose7: Developing sports and recreational facilities.

Specific projects are identified and developed from this set of purposes.

8.9 **District CIL** is the remaining percentage of CIL that goes into the District Infrastructure fund which is pooled and allocated to infrastructure projects that make the development in the area sustainable, e.g. extensions to schools and



health. This may be spent on infrastructure projects identified in the Local Plan’s Infrastructure Delivery Framework, Neighbourhood Plans or through bids received.

8.10 Community consultation undertaken as part of the Neighbourhood Plan process identified the following priorities in respect of community facilities:

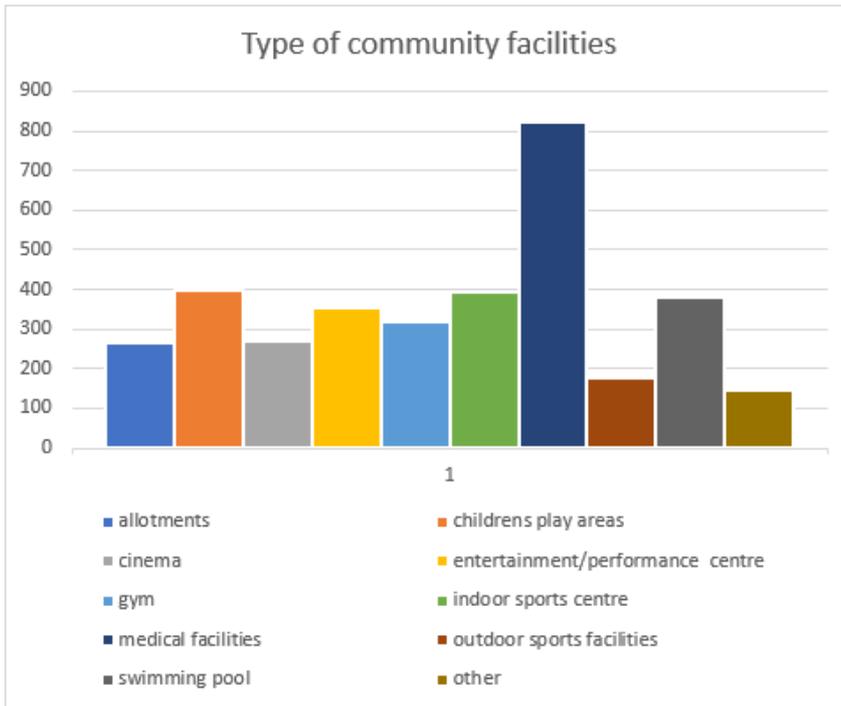
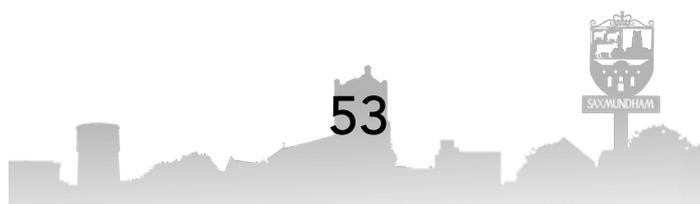


Figure 23: Community facilities identified as important through community consultation.

8.11 The top priority was medical facilities followed by the provision of an indoor sports facility which could also include outdoor sports provision, a gym and a swimming pool which were also identified as priorities for the community. The cost of provision of such facilities is too great to be provided through Neighbourhood CIL alone and therefore the use of other funding streams such as the District Level (pooled CIL contributions) will be required. Given that these facilities have been clearly and consistently identified as priorities by the community, the Town Council is extremely keen to ensure their delivery. The Town Council classes these as ‘Essential Infrastructure’ for the purposes of the District Council’s CIL spending strategy. The Town Council will work closely in partnership with other bodies such as the District Council, County Council and the private sector, as appropriate, to enable the delivery of these facilities.

Community facilities

- 8.12 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. These are discussed in more detail in **Chapter 12**.
- 8.13 Community consultation undertaken as part of the Neighbourhood Plan process revealed that indoor sports provision was the key priority for a facility thought consistently 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 **Policy SAX4** below).
- 8.14 **Policy SAX4** below seeks to reflect the expressed preferences of the community. It expresses support for proposals that would lead to the direct provision of new or improved community facilities and sets out the priorities for those facilities, including whether they are essential or desirable for the purposes of the District's CIL funding strategy. whilst ensuring that such proposals are acceptable in terms of their impact upon amenity, the environment and in highways terms. The policy is in the form of an area wide policy in order to reflect the needs for new infrastructure generated by the incremental growth of the town and other allocations outside (as well as due to) the Garden Neighbourhood.



POLICY

SAX4: New community facilities

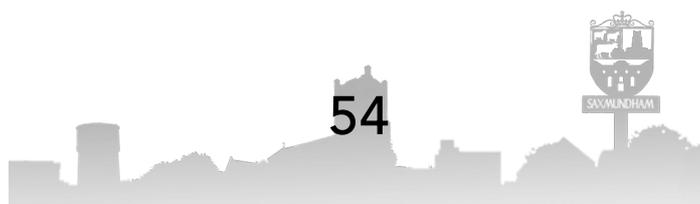
Development proposals for new or improved community facilities will be supported. This includes:

- i. Fully functioning indoor sport and leisure provision within the town.
- ii. A fuller range of local health services, for example, new or expanded health and social care facilities.
- iii. Entertainment and cultural facilities.
- iv. Improved social provision, particularly for the young and the socially isolated.

Proposals should:

- a. Be accessible by high quality walking and cycling links.
- b. Avoid or mitigate significant impacts on the amenity of surrounding residents.
- c. Enhance the local natural environment and avoid or mitigate significant detrimental impacts upon the local natural environment.
- d. Avoid severe impact to highway function or safety and mitigate any significant impacts to highway function or safety.

(See also **Policy SAX14** relating to community gardens and allotments and **Policy SAXGN3** relating to the Garden Neighbourhood).





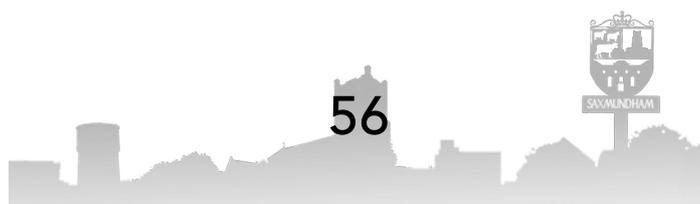
9. Parish wide: Transport and movement

Strategic transport context

- 9.1 Saxmundham's strategic links are provided by the A12 to the west which provides road access to the town and much of the parish. The town has a railway station which provides good rail access on the East Suffolk Railway line providing passenger services to Ipswich and Lowestoft, from which onward connections can be made.
- 9.2 From the south, Saxmundham is primarily accessed by the B1121 'South Entrance' which provides an historic entrance to the town centre. It is at this end of the town that the proposed Garden Neighbourhood will be located. Vehicular access to the Garden Neighbourhood is expected to be from the west via the A12, and the creation of a new access point onto the existing road network. This access point will also serve the proposed employment area to be located west of the A12.
- 9.3 The household survey results revealed that 45 per cent of respondents used the train service and that they were largely satisfied with the service. A much lower percentage 16 per cent of respondents said they used the bus service and 56 per cent were dissatisfied with the service provided.
- 9.4 Rail users were also asked what improvements were required to the local train service. From 400 respondents, 147 identified the facilities at the train station itself as needing improvement and this was the most popular issue raised. Respondents were also asked about specific improvements with physical

improvements to the building itself, better catering facilities and improved waiting/seating area being the highest priorities.

- 9.5 Accessibility within the town itself for pedestrians and cyclists was also examined by the household survey with results revealing support for cycle routes, some pedestrianisation of the High Street, wider pavements and footpaths and cycle parking and storage.
- 9.6 As with many market towns, Saxmundham has its share of traffic issues. Congestion in the town centre can occur at peak times and when HGVs are delivering to town centre businesses. The historic core of the town can become difficult to navigate which is not unusual for a historic town whose original street pattern was designed to accommodate considerably less and substantially different traffic levels and transport modes. Some pavements cannot accommodate the requirements of mobility guidelines.
- 9.7 Whilst concerns over traffic congestion, speeding and unregulated parking are often issues of concern to local communities, the planning process and Neighbourhood Plans more specifically are limited in the ability to address many transport issues as their policies are only enacted where development occurs. Neighbourhood Plan policies therefore cannot address issues such as speeding, congestion, or nuisance parking where these are already existing problems, but may be able to influence such issues for the future and ensure that new development does not exacerbate existing problems or cause new ones.
- 9.8 Government guidance in respect of plan making and transport issues tends to focus on promoting sustainable transport. Plans are urged to consider at an early stage the impacts of development on transport networks, realise opportunities for improvement, promote walking and cycling and public transport use and ensure that any adverse impacts of traffic are mitigated. It is also acknowledged that the pattern of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- 9.9 The government advises that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, which can help to reduce congestions and emissions and improve air quality and public health.

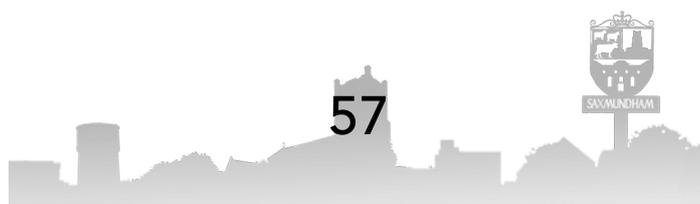


Objective 3: To improve transport and safe accessibility for the people of Saxmundham by foot, bicycle, mobility scooter and public or private transport resulting in environmental and health benefits.

Walking and cycling connectivity

- 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).⁹ 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. Furthermore since the 2023 Neighbourhood Plan was made, East Suffolk Council has adopted the East Suffolk Cycling and Walking Strategy. The strategy is available here:
<https://www.eastsuffolk.gov.uk/planning/planning-policy-and-local-plans/east-suffolk-cycling-and-walking-strategy/>
- 9.11 Such walking and cycling 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 **Policy SAXGN1** for more detail on connecting the Garden Neighbourhood and **Policy SAXTC1** for more detail on 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.

⁹ Suffolk Green Access Strategy, <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-rights-of-way/suffolk-green-access-strategy-2020-2030.pdf>



POLICY	<p>SAX5: Improving connectivity</p> <p>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.</p> <p>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.</p> <p>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 in so far as it relates to works within the plan area.</p> <p>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 capable of 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.</p> <p>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.</p> <p>See also Saxmundham Design Guidelines and Code for the Neighbourhood Plan Area (Appendix E).</p>
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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.

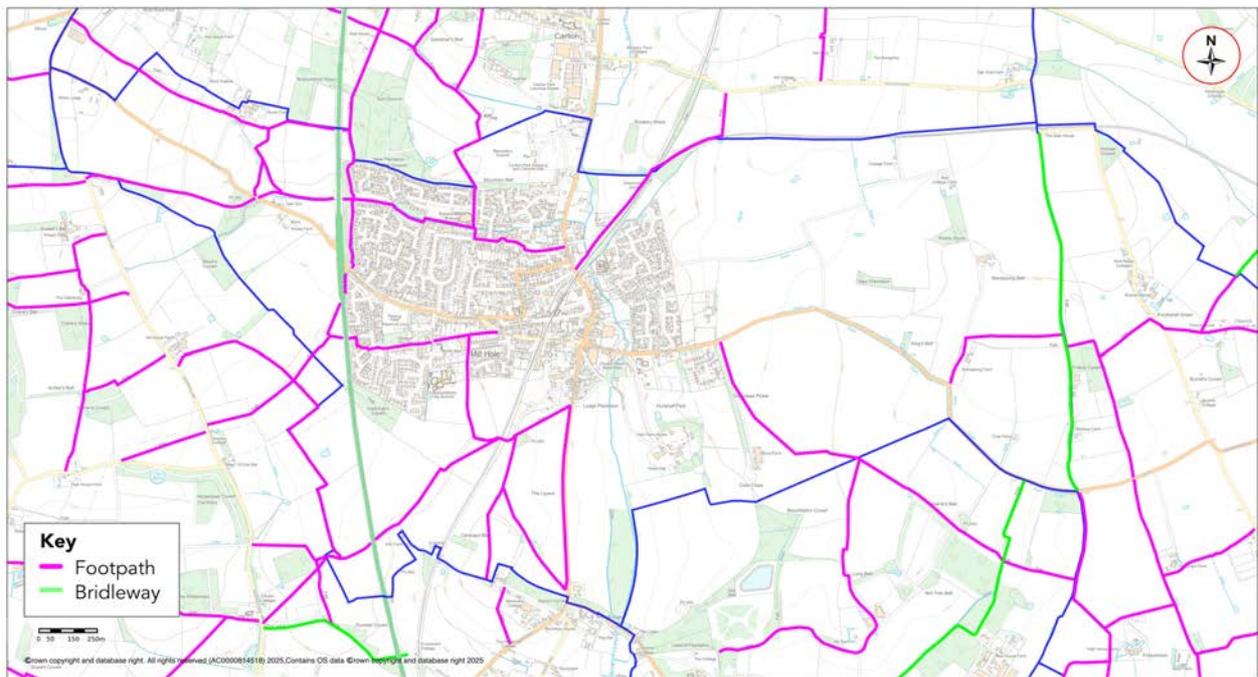
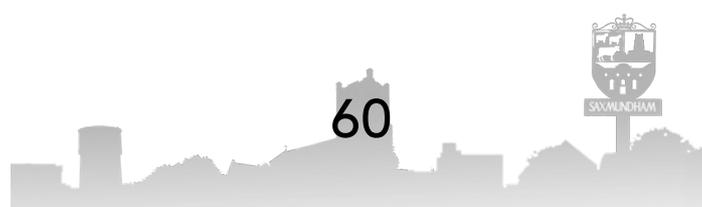


Figure 24: Public Rights of Way in Saxmundham parish (source: Parish Online, with own annotations). Blue line denotes parish boundary.

POLICY	<p>SAX6: Public Rights of Way</p> <p>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.</p> <p>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 and be in accordance with Local Highway Authority (PRoW) guidance to meet current specifications for all user types.</p> <p>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.</p>
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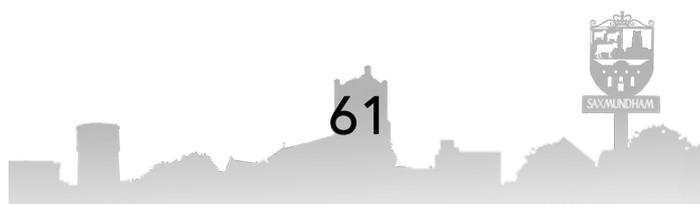
Parking

- 9.16 Government guidance recognises that there continues to be a demand for parking in both residential and non-residential developments. The NPPF makes it clear that parking standards for residential and non-residential development should only be set where there are clear and compelling reasons for doing so that are necessary to manage the local road network. Parking provision for developments in East Suffolk will be made in order to satisfy the relevant adopted standards of East Suffolk Council as local planning authority.
- 9.17 Adequate and well-maintained parking provision is an important element of new development, whether it is for a single dwelling or for a major housing scheme or business premises. The Neighbourhood Plan encourages sustainable transport options, however, it is also a reality that private cars will be used to access services and employment either within or beyond the town.
- 9.18 Allocated parking in new residential development should discourage indiscriminate and on-kerb parking. As demand for electric vehicles is expected to increase over the plan period, opportunities should be taken to encourage



and require the installation of electric charging points both in residential and non-residential developments.

- 9.19 In larger housing developments, unless parking provision is well designed it can either dominate or detract from the overall visual appearance of that development. Where parking is to be provided it should be an integral part of the design and layout and it should also be designed to meet the needs of residents it is intended to serve. East Suffolk Council uses the Suffolk Guidelines for Parking, and these are therefore applicable within the Neighbourhood Plan area.
- 9.20 Whilst it is recognised that the use of cars for personal mobility will continue and therefore provision for parking is necessary, the principles of high-quality design and the creation of a safe, attractive and liveable environment is still paramount. Detailed consideration should be given to the provision of new parking, which should aim to be discreet and not dominate the design of development. The **Saxmundham Design Guidelines and Code for the Neighbourhood Plan Area July 2021** provides useful guidance on the design of parking areas which the proposers of development are encouraged to follow.



POLICY

SAX7: Parking provision

Parking provision (including cycle parking) for all new development in the Neighbourhood Plan area shall be in accordance with the adopted parking standards of Suffolk County Council.¹⁰

Residential parking

Parking in new housing developments should be located to be discreet, accessible, and appropriate to both the character of the proposed development and the character of the existing area. New parking surfaces will be expected to use permeable materials to minimise the occurrence of flooding.

Taking into account the proposal and its location, individual parking provision should include adequate off-street parking for the size of the dwelling. Where garages are proposed they should be a minimum of 4.95m in length with a width of at least 2.9m in order to accommodate and provide easy access to and from a range of modern vehicles.

Where parking areas are proposed they should:

- i. Be located to promote natural surveillance and security.
- ii. Where appropriate, make specific provision for layby parking and visitor parking.
- iii. Be well designed, including landscaping between parking bays.
- iv. Safe and convenient for users, including appropriate lighting.

Non-residential parking

Non-residential development including, commercial, retail and leisure development should provide adequate parking for the intended users of that development, including staff and customers to avoid creating parking problems such as parking on pavements and verges.

See also **Saxmundham Design Guidelines and Code for the Neighbourhood Plan Area**. See also Policy SAXGN4.

¹⁰ Parking guidance, Suffolk County Council, <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/parking-guidance/>



10. Parish wide: **Housing**

Scale and location of new housing

- 10.1 Government guidance advises that Neighbourhood Plans must be in general conformity with the strategic policies contained in any development plan that covers their area. In addition, they should support the delivery of strategic policies contained in local plans and should shape and direct development that is outside these strategic policies. Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.
- 10.2 The issue of new housing is often a key determinant in the decision by a local community to embark upon the production of a Neighbourhood Plan. The issue of future housing development in Saxmundham is a key issue for the town over the next 15-20 years, particularly its potential impacts upon the people, services and environment of the town and parish.
- 10.3 As referred to in earlier chapters, the Adopted Local Plan makes a significant allocation of 66.6 hectares (approximately 800 new dwellings) in the form of the South Saxmundham Garden Neighbourhood. In addition, a further 2.18 hectares of land (approximately 40 dwellings) is allocated in the Local Plan, at land north-east of Street Farm. Between April 2001 and March 2020, 1,030 new homes were built in the parish with over 600 of these being constructed since 2011. The total quantity of dwellings in the parish in 2019 was estimated at 2,190 (source Valuation Office Agency). Data provided by East Suffolk Council indicated that on 31st March 2020, there were outstanding (unimplemented) permissions for a further 62 dwellings in the parish. The total as of March 2020 was therefore believed to be approximately 2,200 dwellings.

- 10.4 The Adopted Local Plan has identified the housing requirement for the district as a whole and has made specific allocations within the parish. The Modified Neighbourhood Plan recognises that in addition to these allocations, there will be 'windfall development' which will come forward during the Neighbourhood Plan period. Following early feedback from the community, the Town Council has therefore taken the view that neither the Neighbourhood Plan nor the Modified Neighbourhood Plan will make further allocations for new housing development but instead will focus its policies on managing the impacts of this proposed level of development over the plan period.
- 10.5 The Neighbourhood Plan also does not intend to alter the current adopted Settlement Boundary for the town and therefore will use that in the adopted Local Plan for the purposes of the policies in the Neighbourhood Plan. The settlement boundary will be expected to be the focus for new windfall development outside the specific Local Plan allocations. Proposals for development inside the settlement boundary including small scale infill development (e.g. individual houses or small groups of dwellings) will be supported subject to the proposals meeting certain design criteria such as not having adverse impacts upon the natural or built environment or highway safety and the design criteria set out in **Policy SAX1**. In addition, proposals that would lead to the development of new housing in existing back gardens, back land or tandem development will only be supported where they meet certain criteria in relation to impact on the natural and historic environment, highways safety and residential amenity. This form of development they should not result in a cramped form of development, or a density of development that detracts from the overall character of the area. The following **Policy SAX8** sets out the criteria for the consideration of proposals for new windfall and infill development.

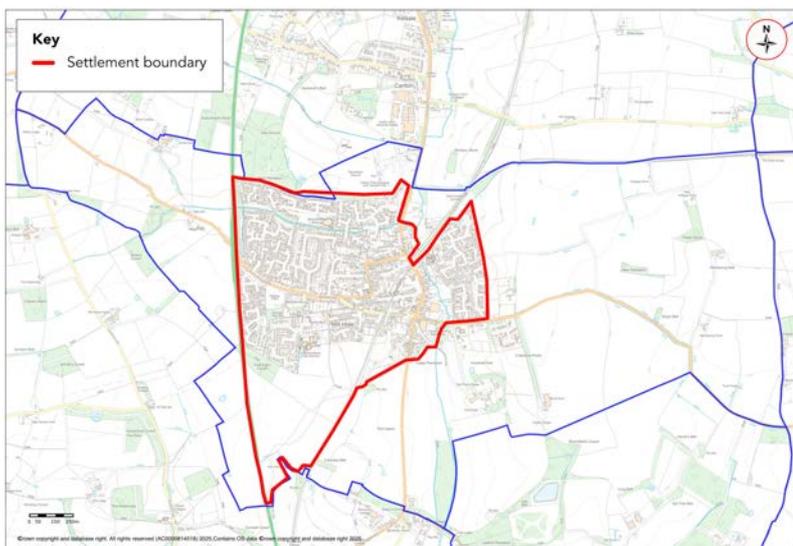


Figure 25: Settlement boundary (source: Parish Online, with own annotations). Blue line denotes parish boundary.

POLICY

SAX8: Windfall and infill development

Proposals for windfall and infill development should:

- a. Be located within the defined settlement boundary, and
- b. Not have an adverse impact upon the historic or natural environment or highway safety, and
- c. Have a close functional relationship with the existing built-up area of the town and the existing pattern of development, and
- d. Be self-contained with logical, natural boundaries, and
- e. Be appropriate in size and scale to the site, its setting, and the town, and
- f. Not have an adverse impact upon the amenity of adjoining occupiers.

Proposals for back land,¹¹ tandem¹² or the development of gardens will only be supported where they meet all of the above criteria, and where they would not result in a cramped form of development or a density of development that would detract from the overall character of the area. Both the existing and proposed dwellings should have sufficient outdoor amenity space.

Objective 4: To promote the development of high quality, energy efficient housing to meet the needs of the people of Saxmundham.

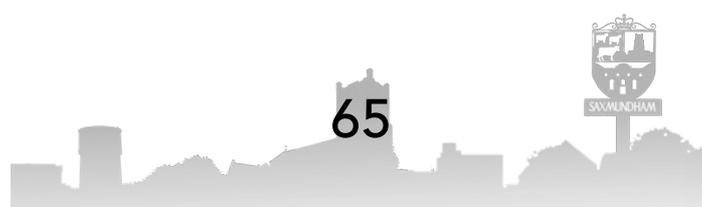
Housing need and mix

10.6 As well as housing numbers, the size, type and tenure of any new housing is also a key issue for local communities in respect of new housing. The specific mix of housing will clearly have an impact on the existing community and therefore careful thought needs to be applied to determining that mix.

10.7 Delivering a wide choice of high-quality homes is essential to support a sustainable, vibrant, and mixed community. Community consultation, including the results from the questionnaire revealed that residents want to have a range of types of accommodation to meet their changing needs and to cater for any needs that are currently not being met. 53 per cent of respondents felt that the

¹¹ Development involving the re-use of parts of a number of rear gardens to existing houses for further residential development.

¹² Tandem development refers to land set back behind existing properties often existing houses, utilising brownfield or garden land generally with limited street frontage.



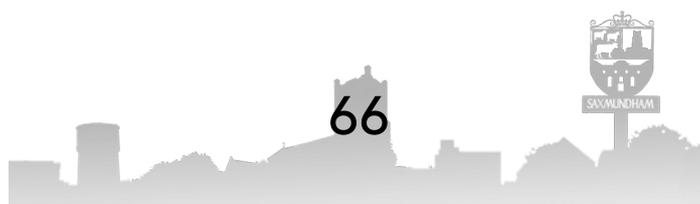
share of affordable housing (for rent or ownership) should account for between 10 per cent- 25 per cent (of the dwellings proposed on a site), whilst 47 per cent felt it should be over 25 per cent. 73 per cent of respondents supported owner-occupied housing as a priority with 41 per cent in favour of social housing. Shared ownership homes and sheltered housing each had the support of around one third and there was also some support for bungalows. The survey also asked for respondents to indicate a preference of the size of dwelling to be provided in the town in the future and 80 per cent of respondents indicated support for 2-3 bedroomed dwellings.

Affordable Housing

- 10.8 There is no specific Housing Needs Assessment for Saxmundham as part of the Neighbourhood Plan process, however there is wider district data available to support the adopted Local Plan policies. **See Local Plan policies SCLP5.8 and 5.10.** Further information can be found in the East Suffolk Affordable Housing Supplementary Planning Document (SPD):
<https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Affordable-Housing/Affordable-Housing-SPD.pdf>
- 10.9 The new dwellings allocated in the Adopted Local Plan should deliver at least 277 units (33 per cent) of Affordable Housing. There may be other opportunities that arise through infill, windfall, or redevelopment over the Neighbourhood Plan period. The Adopted Local Plan Policy SCLP5.10 requires that 1 in 3 dwellings should be affordable on sites over 10 units or 0.5 hectares. Of these affordable dwellings, 50 per cent should be for affordable rent/social rent, 25 per cent should be for shared ownership and 25 per cent should be for discounted home ownership. Provision is expected to be made on-site, unless it can be demonstrated in exceptional circumstances that it is not feasible or practical to provide the units on site in which case it may be agreed that a commuted sum could be paid towards provision of affordable housing outside the site.

Dwelling size

- 10.10 The parish is expecting a substantial volume of new development during the Plan period. It would be unwise for this to be delivered in an unbalanced way (e.g. with too much emphasis on large homes). Those wishing to move within or relocate to the area will have a range of circumstances and preferences, and they should be offered a range of options. It is also overly simplistic to think



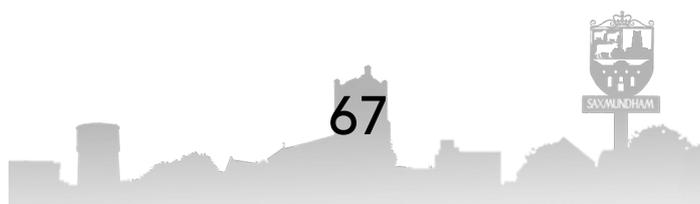
about home sizes in terms of the number of bedrooms offered. There is a significant contrast between a 4 bedroom 'executive' home with a luxury specification on a large rural plot and a 4-bedroom townhouse suitable for a large family on a lower income within walking distance of local schools.

- 10.11 Therefore the Neighbourhood Plan should encourage for all sizes of home to be provided in Saxmundham in future years. In particular, encouragement is given for additional provision of accommodation suitable for vulnerable people or those with special needs. Housing provision in the parish should be part of a dwelling size mix that is balanced overall and which meets the needs of a growing older population as well as those currently priced out of the market.

POLICY

SAX9: Tenure blind Housing Development

Where affordable housing is to be provided it should be indistinguishable from other tenures in external form, quality, and character. In order to encourage both physical and social integration, affordable housing should be spread throughout any new development.



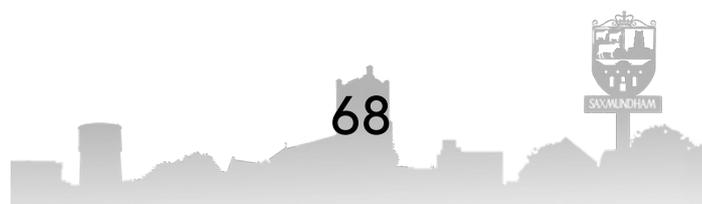


11. Parish wide: Heritage and the natural environment

Objective 5: To protect and enhance the conservation area, the town's heritage, green spaces, natural features and rural setting and to address the challenges of climate change.

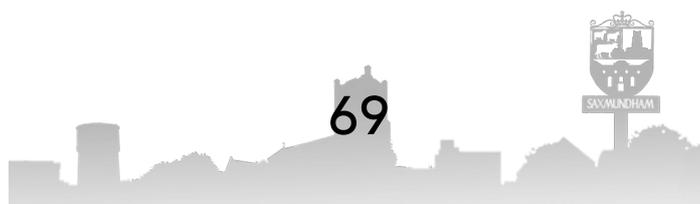
Heritage protection

- 11.1 Saxmundham possesses a high quality and varied historic environment with a wealth of historic buildings and structures concentrated within the historic core of the town centre which is reflected in its designation as a Conservation Area. The Conservation Area was originally designated in 1970 by East Suffolk County Council; it was then extended by Suffolk Coastal District Council in 1980 and redesignated in 1991. The designation and re-appraisal of Conservation Areas is an important process and one that is governed by the Planning (Listed Buildings & Conservation Areas) Act 1990. The Council has a duty to review its Conservation Area designations and in 2016, the District Council undertook a Conservation Area Appraisal resulting in the production of some management guidelines.
- 11.2 The Conservation Area Appraisal 2016, describes the overall character of Saxmundham as one of 'a reasonably well-preserved historic Suffolk market town of picturesque and attractive appearance. In particular the town centre and roads leading from the High Street retain the special characteristics that strongly justify its Conservation Area designation.' This Neighbourhood Plan



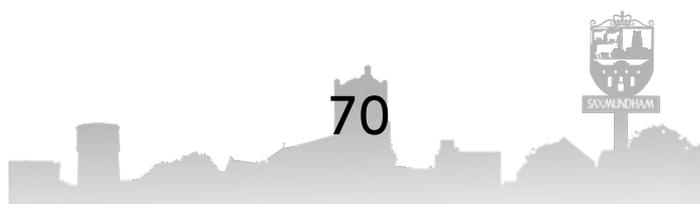
draws upon and affirms the Appraisal's contents and guidance in the following paragraphs.

- 11.3 At the heart of the Conservation Area is the historic Market Place. This area is located to the west of The High Street and hidden from the road by a row of commercial premises and dwellings. The High Street runs approximately north – south, and generally the most high-status buildings found in Saxmundham abut this road. Those premises located within the town centre are largely commercial (often with domestic accommodation above) whereas to the northern and southern extremities of the Conservation Area, as well as to the tributary roads to the east and west, domestic properties are found. Those dwellings located close to the railway station tend to be of nineteenth century date, smaller in scale and more concentrated in terms of spatial density. Scattered around this area are former commercial and industrial sites, including land once occupied by the gas works and the site of a maltings complex northeast of the station.
- 11.4 Closer to the Market Place buildings tend to be of sixteenth, seventeenth- and eighteenth-century date, whereas to the north and south extremities of the Conservation Area sizeable individual properties from the eighteenth and nineteenth century, and set in private gardens and landscapes, are found.
- 11.5 The overall character of Saxmundham is very much one of an historic Suffolk market town which retains its traditional form and appearance. Despite some 20th Century development, some small-scale incremental change having taken place, the town centre retains the special characteristics which strongly justify its Conservation Area designation.
- 11.6 These special characteristics include, amongst other things, the number and quality of its traditional buildings and the fact that most still retain their traditional features; the shape, form and layout of the settlement itself; and the attractive relationship that exists between the older buildings and the spaces between and around them.
- 11.7 Important landscape features such as trees, shrubs, hedges, old walls, and railings all make a major contribution. It is vitally important therefore, that these special characteristics are retained and reinforced.
- 11.8 Inappropriate development, neglect and the cumulative effect of incremental change are a constant threat to the special architectural and historic interest of any Conservation Area. Detrimental change can take many forms, from infill



with poorly designed new development to modern replacement windows and doors in old buildings.

- 11.9 Other changes can include: inappropriate alterations and extensions which do not respect the scale, form and detailing of existing buildings, the use of modern materials and details in the area, insensitive highway works and signage, unsympathetic shopfronts and advertising, the construction of intrusive non-traditional walls, fences, driveways, garages, outbuildings and other structures.
- 11.10 In terms of materials and finishes, the use of concrete tiles, artificial slates, plastic and aluminium windows and doors, cement render and modern bricks, should all be avoided. So too should the use of brown stain on timber joinery, windows and doors as it invariably appears as a particularly discordant feature in an area where the tradition of using white paint forms an important unifying element in the street scene. Old facing brickwork should not be painted over and where this has happened in the past the Council will provide advice on the potential for its removal.
- 11.11 The surfaces between buildings also need very careful consideration. Special materials, including natural stone, bound gravel and exposed aggregate kerbs, paving slabs and blocks will normally be the most suitable. Certain types of concrete brick paving should not be used because they have a harsh modern appearance which is very much at odds with the traditional character of the Conservation Area. In order to protect the character and appearance of the Saxmundham Conservation Area the Neighbourhood Plan will, wherever possible, seek to prevent such inappropriate changes from taking place through a specific Neighbourhood Plan policy (**SAX10 below**).
- 11.12 When development is proposed within a Conservation Area, it can be a challenge to consider what is appropriate for the design of new development and whether this can include high quality modern design. Pastiche can be acceptable but is not always well delivered particularly where existing buildings contain a number of decorative features. Certain characteristics can be used as inspiration without resorting to copying. This approach can ensure that new design is both creative and contextual. New development should always respect the grain of the Conservation Area, including preservation of building lines, relationship to gardens, streets, parking and farmland, scale, density and uses.



- 11.13 Proper account should also always be taken of the impact that new development adjacent to a Conservation Area can have on its setting. Although a Conservation Area boundary represents a demarcation enclosing a special area of historic interest, changes immediately outside of it can still have a significant impact on character and appearance. The setting of the Conservation Area, therefore, has an intrinsic value that must be acknowledged in any proposals for change to it, and this protection is enshrined in the NPPF.
- 11.14 A key component of Conservation Areas that is afforded protection by their designation is that regarding trees, to ensure that the spaces they need to grow and thrive are preserved and enhanced. New boundary treatments to property can also provide enhancement to the Conservation Area and here the use of materials rich in character with the settlement should be considered. Walls, fences, railings and hedges (whether native or ornamental) can be carefully chosen to reflect local styles and respond/create a sense of local distinctiveness. The Conservation Area Appraisal makes a number of recommendations, and these are reflected in **Policy SAX10** below. In addition the District Council have recently adopted an Historic Environment Supplementary Planning Document which contains useful advice on many heritage matters: <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Historic-Environment-SPD/Historic-Environment-SPD-reduced.pdf>

Shopfronts in the Conservation Area

- 11.15 By their very nature Conservation Areas tend to be focused on the historic core of a settlement, which will usually include the town or village centre which includes the centre of retail activity. The successful and sustained stewardship of historic retail is closely linked with the on-going health of the retail sector.
- 11.16 In recent years, out of town retail sites, changing shopping habits and the growth of online retailing have all challenged town centres. As the number of people visiting and the range of shops to be found in town centres has changed, there has been a related impact on the local historic character of town centre buildings, their range of uses and street patterns. These may well be permanent changes. The decline in use of a number of particular types of buildings (for example pubs, post offices and banks) has added to the problem. Reduced footfall and increased vacancy rates in some areas has led to under-investment and a deterioration in the quality of the environment. At the same time, there have been changes to the planning system that have



made it easier to transform retail and office buildings into residential properties. These changes can also have a major impact on the character of historic places. On the other hand, there is some evidence that, following the COVID-19 pandemic, traditional smaller market towns may be attracting more, or losing less, shopping 'footfall' than larger cities.

11.17 Historic England has published a raft of useful advice on Historic Town Centres, including guidance on public realm,¹³ Works to Highways and Public Realm: Streets for All¹⁴ and highways improvements.¹⁵ Such guidance advocates a collaborative approach to town centre management and a joined-up approach to transport (including the provision of the necessary services for town centre uses, such as loading bays) underpins a welcoming and attractive arrival experience for visitors.

11.18 Ensuring that public realm is designed to be in keeping with the surrounding built environment is important (controls over the use of signage and street furniture also contribute to the overall attractiveness of the public realm of a settlement). Reviewing and managing shop fronts as a collection rather than individually is also preferable.

Please note that Suffolk County Council Archaeological Service advise that there should be early consultation with the Historic Environment Record (HER) and assessment of the archaeological potential of any area proposed for development at an appropriate stage in the design of new developments. The Archaeological service is happy to advise on the level of assessment and appropriate stages to be undertaken

¹³ Public Realm - all parts of the built environment where the public has free access.

¹⁴ Streets for All, Historic England, <https://historicengland.org.uk/images-books/publications/streets-for-all/>

¹⁵ Historic Town Centres and High Streets, Historic England, <https://historicengland.org.uk/advice/planning/historic-towns-and-high-streets/>



SAX10: Historic town centre and Conservation Area

The special character of Saxmundham Conservation Area and its setting will be preserved and enhanced. This will be achieved by:

- a. Encouraging the retention and maintenance of traditional buildings and shop fronts which contribute to the overall character of the Conservation Area, whether listed or not.
- b. Ensuring that new development is sympathetic to the special qualities, character and appearance of the Conservation Area and takes account of its historic significance.
- c. Protecting the setting of the Conservation Area from development which adversely affects views into or out of the Conservation Area
- d. Ensuring that new development complements the built form and layout of the settlement itself and the attractive relationship which exists between the older buildings and the spaces between and around them.
- e. Encouraging the maintenance and enhancement of features and details which contribute to the area's local distinctiveness e.g., shopfronts, important landscape features such as trees and shrubs, walls, and railings.
- f. Requiring the use of high-quality traditional building materials and detailing, including but not limited to:
 - i. Local Suffolk bricks, e.g., soft reds largely on the rear elevations and hard whites on the front facades).
 - ii. Lime render.
 - iii. Pantile roofs.
 - iv. Decorative details such as pargeting, or ashlar scored lines/stone blocks.

The use of non-traditional materials such as concrete tiles, artificial slates, plastic and aluminium windows and doors, cement render and modern bricks, should be avoided.

All proposals should have regard to the advice contained within the Design Guidelines and Codes for the Neighbourhood Plan Area as set out in **Appendix E** and where relevant the Concept Masterplan for the High Street (**Appendix F**).

Signage and shopfronts

Where the need for new or reconfigured advertising signage (including shopfronts, highways and directional signage) has been established,



consideration must be given to its size, design, and siting to ensure that it enhances the character and appearance of the Conservation Area. Proposals that seek to rationalise or reduce the amount of signage within the Conservation Area will be supported.

Street furniture

Proposals seeking to enhance the streetscape and public spaces through appropriate use of street furniture and where practicable results in the provision of wider pavements which preserves and enhances the area will be supported.

Non-designated Heritage Assets

- 11.19 The government's Planning Practice Guidance (PPG) recognises that there are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets. In some areas, local authorities identify some Non-designated Heritage Assets as 'locally Listed'. The PPG goes on to explain that these can be identified through Local Plans (and now most commonly through Neighbourhood Plans) and can be a positive way for the local community to identify Non-designated Heritage Assets against consistent criteria so as to improve the predictability of the potential for sustainable development.
- 11.20 The NPPF indicates that the effects of an application on the significance of a Non-designated Heritage Assets should be taken into account in determining the applications.
- 11.21 The household survey undertaken did not ask specific questions around Saxmundham's heritage although in answers to other questions it was clear that local residents valued the historic past of the town centre and felt that more could be done to improve it and to protect it.
- 11.22 The Steering Group Members identified a number of potential Non-designated Heritage Assets in the town. All of the suggested nominations for Non-designated Heritage Assets have been assessed against criteria based on the Local Heritage Listing: Historic England Advice Note 7, page 9. The results of this exercise are shown in **Appendix B** and those buildings/structures that are



considered to score well when measured against the criteria are included in Policy SAX11 below.

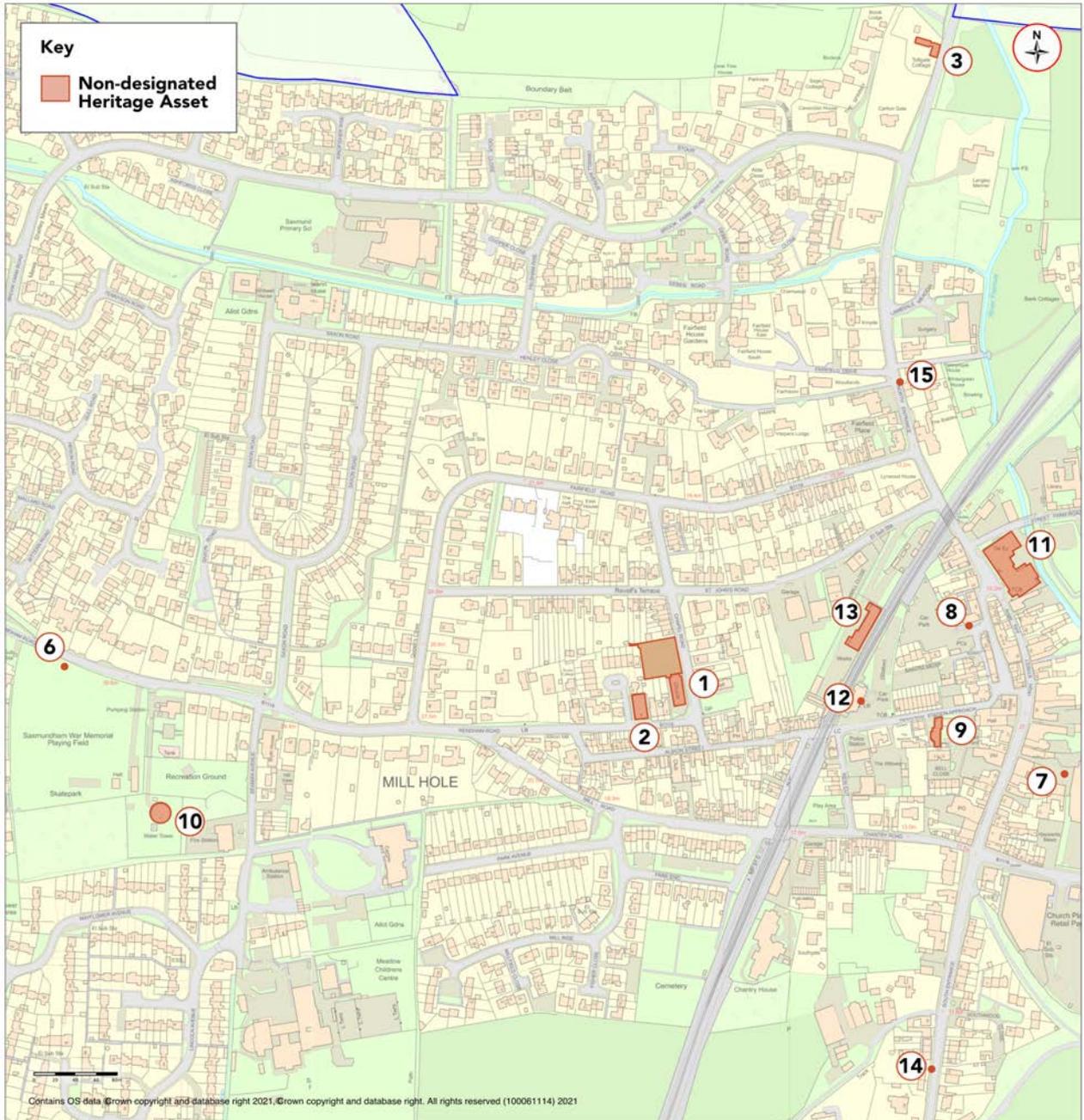


Figure 26: Non-designated Heritage Assets (source: Parish Online, with own annotations).

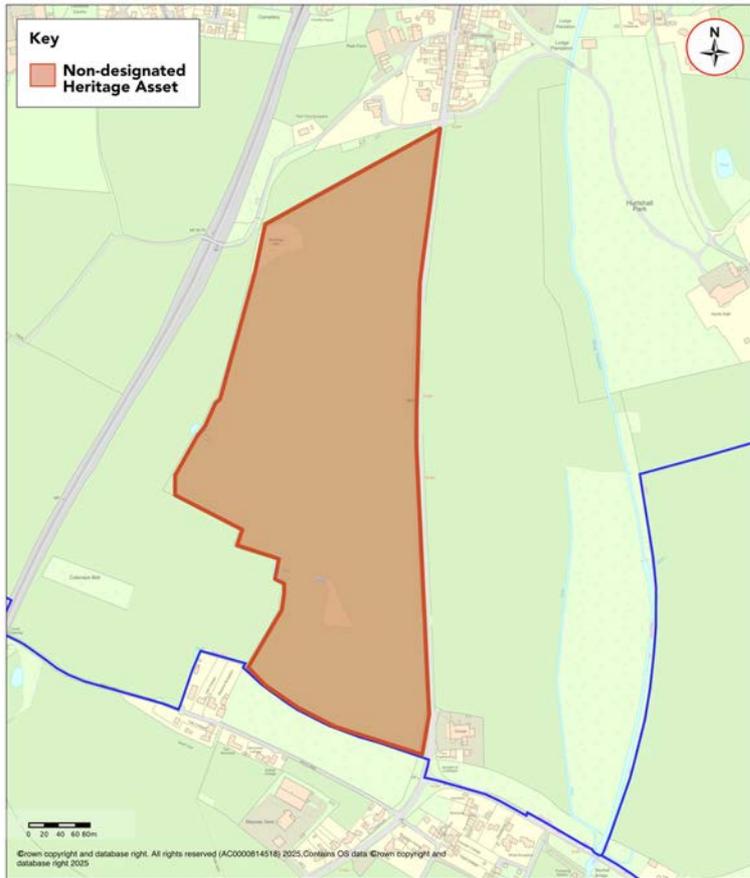


Figure 27: Non-designated Heritage Assets (source: Parish Online, with own annotations). Blue line denotes parish boundary.

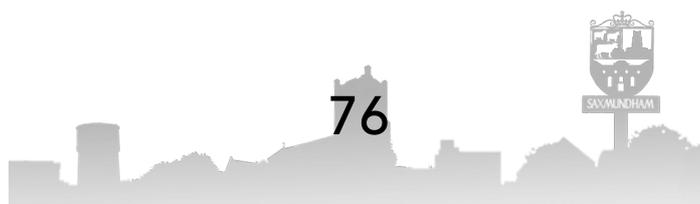
Note: figure 26 and figure 27 have different scales.

POLICY

SAX11: Non-designated Heritage Assets

The following historic buildings and features (**figure 26 and 27**) are identified as Non-Designated Heritage Assets due to their locally important character and historic features:

1. The United Reformed Church, Chapel Road including its graveyard.
2. The Old Fire Station, Rendham Road.
3. Toll Gate Cottage, North Entrance.
4. The Layers.
5. Milestone on the B1121.
6. The pillbox in the Memorial Field.
7. The War Memorial in Fromus Square.
8. The Town Pump.
9. The Gannon Rooms.
10. The Water Tower, Rendham Road.
11. The Telephone Exchange, High Street.
12. Victorian Post Box at the Railway Station.
13. Saxmundham Goods Shed.
14. Victorian Post Box at South Entrance.



15. George V Post Box at North Entrance.

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.

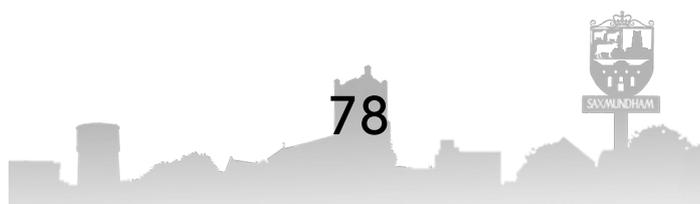
Landscape

- 11.23 Saxmundham is an historic market town set on the bank of the River Fromus, which is a tributary of the River Alde that ultimately reaches the sea south of Orford Ness, after skirting past Snape, Aldeburgh and Orford.
- 11.24 The river valley locates Saxmundham just between two specific landscape character types - the Rolling Estate Sandlands and the Rolling Estate Claylands (to the west) as defined by the Suffolk Landscape Character Assessment, which as a joint project between the County Council and the Suffolk Districts. Peripheral parts of the town also fall within the Ancient Rolling Farmlands character type. The underlying geology is essentially crag deposits, sands and gravels laid down during the Pliocene period over the chalk, which underlies all of Suffolk at depth.
- 11.25 The key characteristics of the Rolling Estate Sandlands character type are:
- Rolling river terraces and coastal slopes.
 - Sandy and free draining soils with areas of heathland.
 - Late enclosure with a pattern of tree belts and straight hedges.
 - Landscape parklands.
 - A focus of settlement in the Estate Sandlands landscape.
 - 19th century red brick buildings with black glazed pantiles in the east.
 - Tree belts and plantations throughout.
 - Occasional and significant semi-natural woodlands and ribbons of wet woodland.
 - Complex and intimate landscape on valley sides.
- 11.26 The Rolling Estate Claylands character type occurs in east Suffolk as linear bands in the middle reaches of the valleys of a number of rivers including the Alde and The Fromus around Kelsale and Carlton. The typical characteristics of this valley side landscape of clay loams with parklands and fragmented woodland include:



- Rolling valley-side landscape.
- Medium clay and loamy soils.
- Organic pattern of fields.
- Occasional areas of more rational planned fields.
- Numerous landscape parks.
- Fragmented woodland cover, both ancient and plantation.
- Winding hedged and occasionally sunken lanes.

- 11.27 This Neighbourhood Plan recognises the intrinsic value and special qualities of this area of landscape and proposes ensure that distinctive features of the two landscape character types are protected insofar as they contribute to the distinct landscape setting of the town.
- 11.28 The transition between rural landscape character and the urban form of the edge of the town is important not only for its landscape value appearance but because of the visual gateway it provides to the appearance of the edge of the town. Land to the south of the town and east of the B1121 with views to Hurts Hall and the town beyond was identified as sensitive by the Suffolk Coastal Settlement Sensitivity Assessment, which was undertaken to support the Local Plan.
- 11.29 Representations made during the Local Plan Examination further expressed the sensitivity of The Layers to development. The Layers is an open area to the west of the B1121 and has some heritage significance –the land between the B1121 and the tree belt being considered particularly sensitive to built development. The Heritage Impact Assessment undertaken to support the Local Plan advises that built development here should be avoided. Local Plan policy SCLP12.29 clarifies that the land east of the railway, which is outside the settlement boundary, is ‘identified for the provision of open space and Suitable Alternative Natural Greenspace (SANG) as part of the Garden Neighbourhood. The retention of existing [agricultural] uses on land to the east of the railway would be supported where this complements the delivery of open space and SANG.
- 11.30 Through consultation, the north, south, east and west entrances to the town have been identified as important entrances providing important ‘green gateways’ due to the soft edge they provide between urban area and the surrounding rural landscape character. Proposals that would enhance the visual appearance of an entrance or ‘gateway’ to the town will be supported, however where ‘green’ gateways or substantially undeveloped entrances



currently exist, these should be maintained as 'soft' entrances to assist with the urban to rural transition.

Important public views

11.31 In addition, the Steering Group have also identified a number of important views and vistas. The Group were mindful that any policy which sought to protect these views should focus on those that are 'important' to the overall landscape character of the parish and which can be enjoyed from publicly accessible locations, e.g., footpaths, public highway, an existing open space, or through a gap between buildings. The views identified are as follows:

1. **View from the B1121 looking across to Hurts Hall and St John's Church:**

The road undulates and at the top of two rises there are open views across to the Church and Hurts Hall which are both important landmarks.

- a) Looking north-east from a point approximately 200m south of the milestone. This is a panoramic view which includes open farmland in the foreground, Hurts Hall and St John's Church in the middle distance backed by wooded rising land.
- b) Looking north-east from a point approximately 100m south of the milestone. This view centres on the church, which is framed by a gap in the trees, and also encompasses the open farmland setting and the rising wooded land behind.



2. **View from the high point of The Layers looking across the River Fromus to Hurts Hall:** Looking due east from the tree line which marks the western edge of The Layers, across open farmland and the River Fromus. This gives a wide view of Hurts Hall



and its associated buildings, and the backdrop of rising woodland. It demonstrates the contrast between the open landscape of the valley and the wooded ridge, below which the town sits.

3. **View along Chantry Road towards St John's Church:** Looking east from outside 7, Chantry Road the road dips away, then curves and rises towards the church. In summer trees fill the view, with the church tower visible above the trees, but in the winter the church is very prominent and dominates the view.



4. **View from Albion Street across the town to Church Hill.** From a point near the top of Albion Street opposite the Sax Club looking due east. This gives an interesting view across the rooftops of the historic centre of the town to the green ridge beyond topped by a line of trees. It emphasises the historic nature of the town and the close proximity of the countryside.



5. **View towards the town from the B1119 (Leiston Road).** The approach from Leiston is across a wide-open plateau. Looking west at a point about 400m east of the access to Wood Farm the view of the tree line along the ridge becomes conspicuous, the town below is hidden, but the view of the trees and the change in the landscape is the first clear indication that the town is nearby (see also Policy EN1).



6. View to towards open countryside from

South Entrance: This view shows the historic exit view from the town to the country, looking along the B1121 to The Layers and the treeline beyond, and reinforcing the traditional settlement boundary.

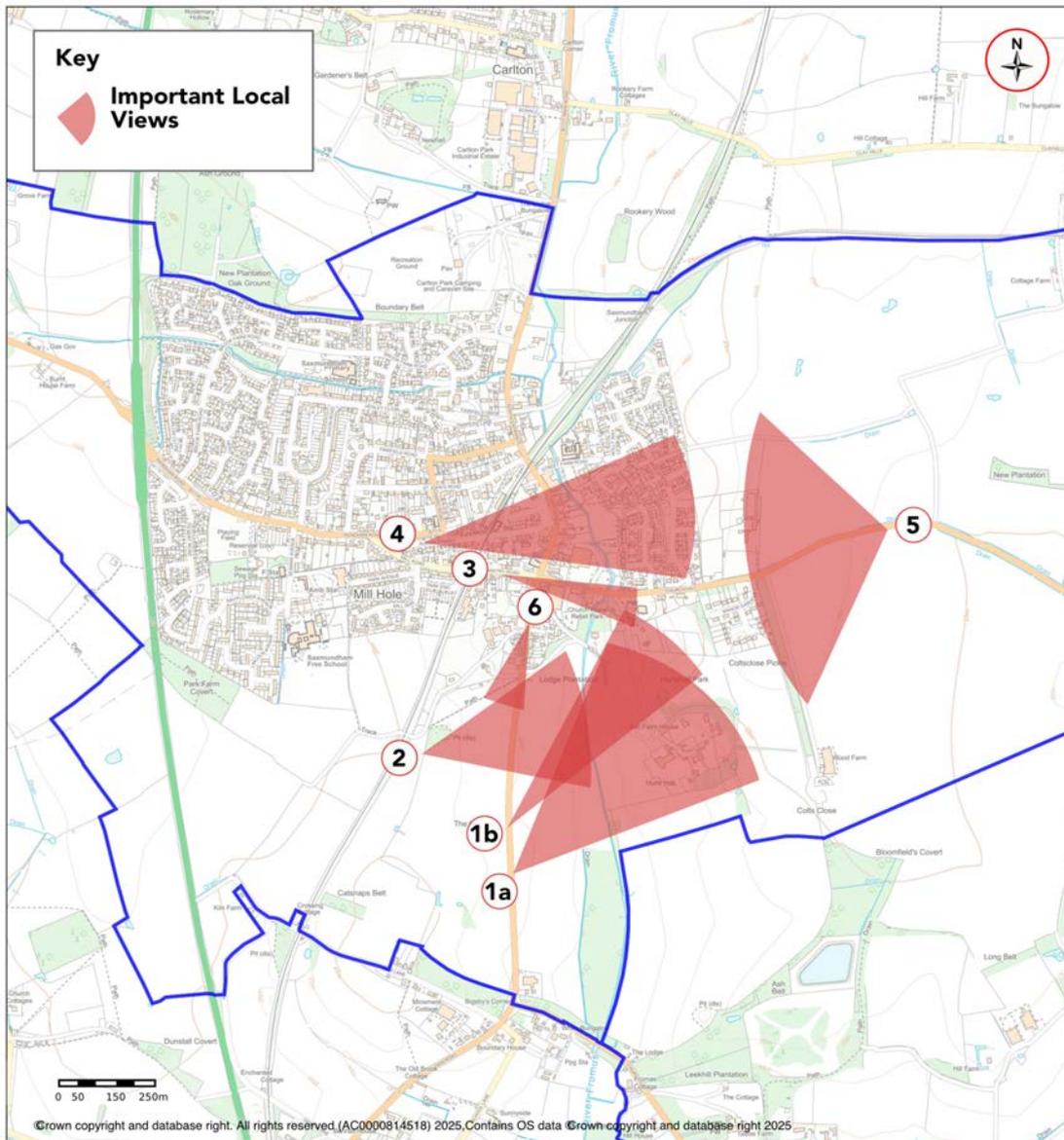


Figure 28: Important Local Views (source: Parish Online with own annotations). Blue line denotes parish boundary.

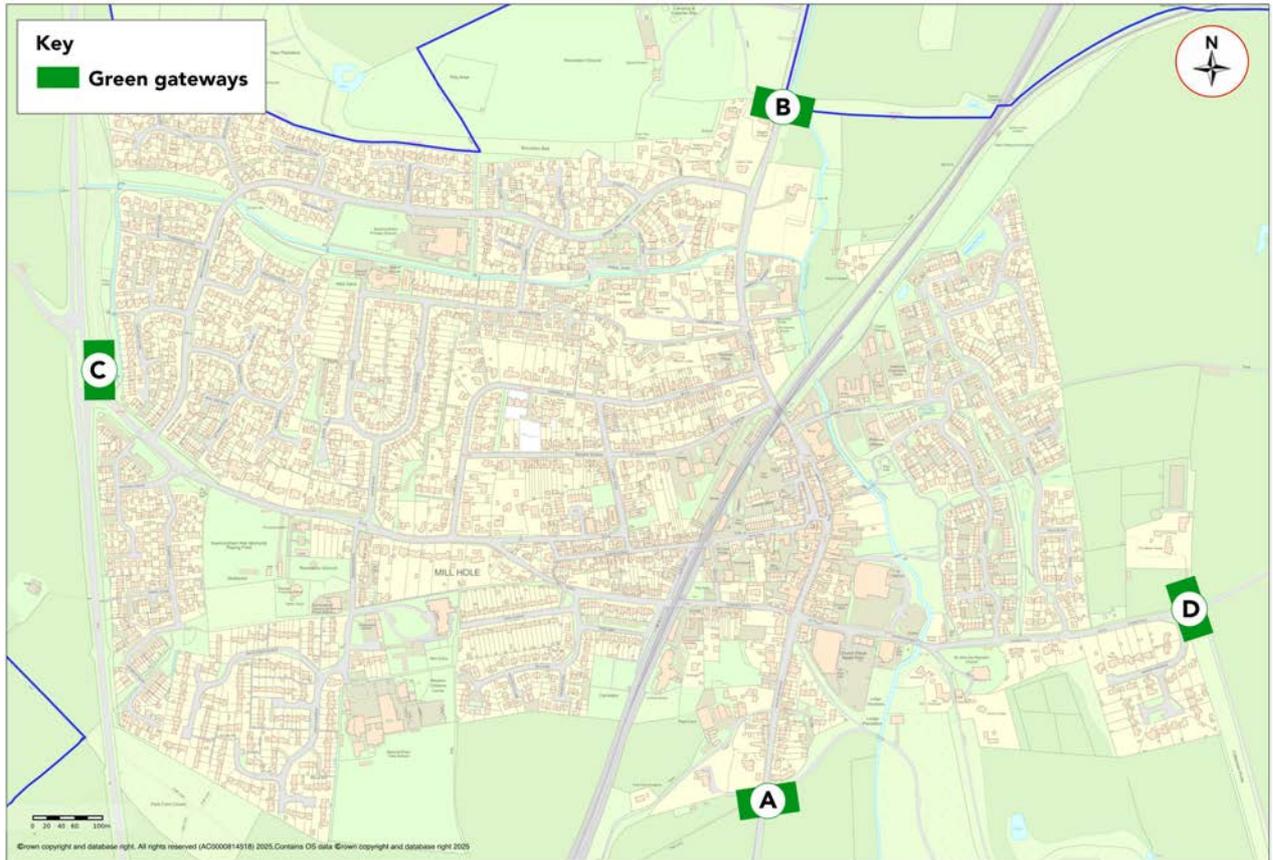


Figure 29: Green gateways (source: Parish Online with own annotations). Blue line denotes parish boundary.

11.32 Taking the above into account **Policy SAX12** has been developed which covers the distinct but related elements of landscape character, the protection of important public views and the enhancement of specific entrances to the town.

SAX12: Gateways, views and the landscape setting of Saxmundham

The visual scenic value of the landscape and countryside in the parish outside of the defined settlement boundary will be protected from development that may adversely affect this character. The existing clear landscape break that physically separates different settlements shall be maintained in order to prevent coalescence and loss of individual settlement distinctiveness and identity.

Development proposals within or which would affect the following important local views should take account of the view concerned. Developments, which would have an unacceptable adverse impact on the landscape or character of the view concerned, will not be supported.

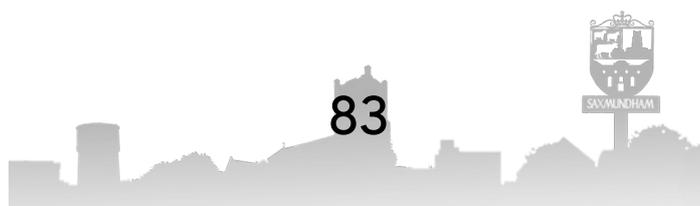
1. View from the B1121 looking across to Hurts Hall and St John's Church.
2. View from the high point of The Layers looking across the River Fromus to Hurts Hall.
3. View along Chantry Road towards St John's Church.
4. View from Albion Street across the town to Church Hill.
5. View towards the town from the B1119 (Leiston Road).
6. View towards the open countryside from South Entrance.

Green Gateways

Proposals that would enhance the visual appearance of an entrance or 'gateway' to the town will be supported however where 'green' gateways or substantially undeveloped entrances currently exist; these should be maintained as 'soft' entrances to assist with the urban to rural transition.

The following are identified as important Green Gateways (**figure 29**):

- A. Southern entrance to be maintained as a green gateway to the town with the provision of accessible natural green space suitable for recreation.
- B. Northern entrance (on Main Road), proposals that would enhance the existing gateway feature adjacent to Tollgate Cottage will be supported in principle, subject to other criteria in this policy.
- C. Western entrance at Rendham Road. The existing landscape buffer north of this entrance between the built-up edge of the town and the A12 shall be retained and enhanced.
- D. Eastern entrance at Leiston Road. The existing landscape buffer and tree line at this entrance shall be retained.



Where gateway enhancements are proposed, schemes should be designed to ensure that gateway enhancements do not detract from highway safety and visual amenity and should minimise the need for non-essential lighting.

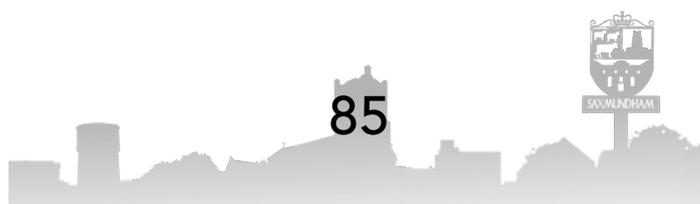
Opportunities to improve the public realm at entrances to the town, through the use of appropriate hard or soft landscaping measures will also be supported where they include the use of vernacular materials and native planting.

Natural assets

- 11.33 In terms of nature conservation sites, the parish itself does not contain significant sites, however this area of East Suffolk is in relatively close proximity to the extremely sensitive Sandlings, Alde-Ore and Minsmere-Walberswick Special Protection Areas (SPAs). Saxmundham falls within the 13 km Zone of Influence (ZOI) for the Council's Recreational Disturbance, Avoidance and Mitigation Scheme (RAMS). As evidenced by the Recreational Disturbance, Avoidance and Mitigation Strategy additional residential development within the ZOI could have a detrimental impact on the designations due to increased recreational disturbance. Natural England advises that consideration of 'off-site' measures (i.e., in and around the relevant European designated site(s)) is required as mitigation for predicted recreational disturbance impacts.
- 11.34 East Suffolk Council, together with Babergh and Mid Suffolk Districts and Ipswich Borough, are taking a collaborative approach to strategic mitigation to support development and avoid impacts on internationally important designated wildlife sites. The councils have produced a combined recreational disturbance, avoidance and mitigation strategy (Suffolk RAMS) for the area. This identifies and costs measures necessary to mitigate recreational impacts and confirms how they will be funded and delivered over the lifetime of the Local Plans. Such measures are to be delivered strategically through the Suffolk Coast RAMS, to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from proposed residential development in the Zone of Influence (ZOI) in line with the Suffolk Coast RAMS and all new housing development in Saxmundham is required to contribute to this scheme. The Habitat Regulations Assessment of the Local Plan identified the need for Suitable Alternative Natural Greenspace (SANG) to mitigate the potential impacts of recreational

disturbance on the above SPA sites from the Garden Neighbourhood allocation.

- 11.35 Nationally and internationally designated sites are protected through national planning policy in the NPPF and also in specific legislation. However, there is often less protection for locally designated sites or non-designated local sites which have a wildlife value or for specific features which may have a wildlife value. **Policy SAX13** below seeks to such features where they are typical of the prevailing landscape character types, such as woodlands, tree belts and plantations, straight hedges etc and where development would damage their wildlife value.
- 11.36 The Environment Act 2021 introduced a new system for the delivery of Biodiversity Net Gain (BNG). In simple terms, BNG is an approach to development which aims to leave the natural environment in a *measurably* better state than it was beforehand. Planning policy that seeks to protect and enhance biodiversity is not new, but this latest approach focuses in more on the *measurability* aspect. Planning applications will need to quantify the different habitat types on site both before and after the proposed development using the latest Biodiversity Metric. A minimum of 10% gain in biodiversity is now mandatory on almost all planning applications except for a small number of statutory exceptions and its importance in the planning process has been significantly elevated.
- 11.37 There are a number of veteran trees and areas of ancient woodland in the parish. A veteran tree is one that is of interest biologically, aesthetically or culturally because of its age, or a tree in the ancient stage of its life or trees that are old relative to others of the same species. Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. The policy also seeks to protect veteran trees.
- 11.38 The policy also refers to 'wildlife corridors' which is a term used to refer to any linear feature in the landscape that can be used for the migration or dispersal of wildlife. Such corridors allow for the linking of habitats and reduce the isolation of populations. Linear features may vary and may also not be continuous however patches of natural habitat can benefit wildlife and occasionally the term 'steppingstones' is used to refer to them. The role of wildlife corridors is assuming greater importance and opportunities should be taken to create them as a consequence of new development.



POLICY	<p>SAX13: Protection and enhancement of natural assets</p> <p>Development proposals will be expected to protect and enhance existing ecological networks and wildlife corridors. Proposals should retain existing features of biodiversity value, associated with the Rolling Estate Claylands and Rolling Estate Sandlands Landscape Character types, where possible to do so, (including ponds, trees (including veteran trees), woodland, hedgerows, and verges).</p> <p>Development proposals will be supported where they provide a minimum 10 per cent net gain in biodiversity through, for example:</p> <ol style="list-style-type: none"> a. The creation of new natural habitats. b. The planting of additional trees and hedgerows. c. The restoration and reparation of fragmented ecological networks. <p>Development proposals should conform to the mitigation hierarchy and seek initially to retain existing features and avoid loss or damage of biodiversity. Where loss or damage is unavoidable, the development shall provide for appropriate replacement planting or appropriate natural features on site together with a method statement for the ongoing care and maintenance of that planting. Where development proposals cause damage to identified natural features, wildlife corridors around the interruption will be constructed.</p> <p>Proposals for new buildings (including non-residential development) should incorporate measures to protect and enhance wildlife species including the incorporation of wildlife friendly measures e.g., bat, swallow and swift boxes, hedgehog doors and insect bricks etc, new garden hedgerows and trees. Consideration should also be given to the use of Sustainable Drainage Systems (SuDS) which can provide considerable benefits to wildlife.</p> <p>Proposals to enhance and increase the biodiversity of important spaces, including green spaces will be supported as will proposals to restore or enhance traditional hedgerows in the parish.</p>
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Community Gardens and allotments

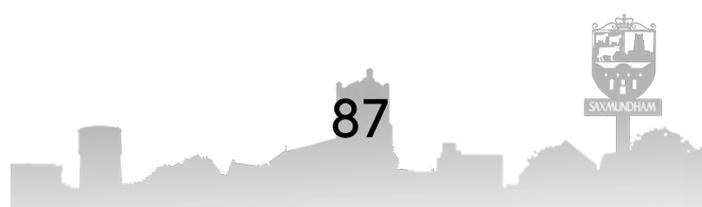
11.39 The NPPF highlights the important contribution to the character and quality of environments that can be derived from trees. They also help with mitigation and adaptation to climate change. The NPPF requires planning polices to

ensure that opportunities are taken to to incorporate trees and other environmental features into developments such as parks, community orchards, community gardens and allotments. The NPPF also recognises the important beneficial contribution to health and wellbeing that access to open spaces such as communal gardens and allotments can bring to a community in addition to the opportunity to grow ones own food. New provision should be easily accessible to the community which it is intended to serve. The Neighbourhood Plan Household survey results revealed significant demand for allotments. (See paragraph 8.9) . Some further useful guidance can be found in the East Suffolk Healthy Environments SPD which was adopted in 2024 and includes guidance on matters such as open space provision, allotments and SANG: <https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Healthy-Environments/Healthy-Environments-SPD-Adoption-version.pdf>

11.40 As well as the provision of new community spaces, planning policies should also seek to safeguard and protect those already in existence, either because of the physical contribution they make to the character of the area or where they have a value to their community.

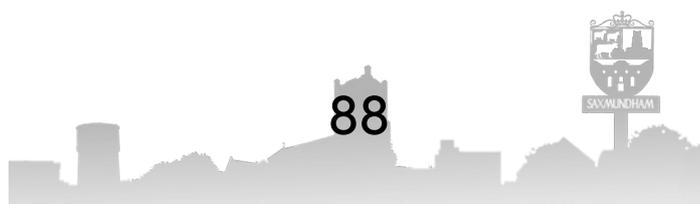
11.41 The existing community garden at the former Fromus Centre site is specifically identified for protection under **Policy SAX14** below.

POLICY	<p>SAX14: Community gardens and allotments</p> <p>The existing community garden at the former Fromus Centre site within Saxmundham will be protected (see Policy SAX15).</p> <p>All new large scale residential developments should be strongly encouraged to make provision for a proportionate area of land for a community garden or allotments to allow for the opportunity for residents to grow their own food, Such spaces and any associated facilities (benches, paths) should be accessible to those with limited mobility in order to reduce the isolation of vulnerable groups.</p> <p>Where land becomes available, the provision of allotments will, in principle, be supported.</p>
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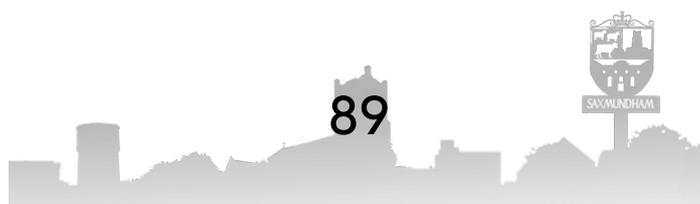
Local Green Spaces

- 11.42 The National Planning Policy Framework 2024, at paragraphs 106-108 introduces the concept of Local Green Spaces which can be identified through neighbourhood plans by local communities and allows green areas identified as being of particular importance to be protected. Paragraph 107, sets out 3 broad criteria for identifying and designating such spaces as follows: 'The Local Green Space designation should only be used when the green space is:
- a. in relatively close proximity to the community it serves.
 - b. demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field) tranquility and richness of its wildlife, and
 - c. local in character and not an extensive tract of land'.
- 11.43 The NPPF at paragraph 108 then goes on to state that 'policies for managing development within a Local Green Space should be consistent with those for green belts' and therefore affords them a very high level of protection. It is also clear that the designation of Local Green Spaces should not be used as a mechanism to try to block or resist development on agricultural land immediately adjacent to village development boundaries and that a successful designation must meet the criteria outlined above.
- 11.44 Such spaces can be viewed locally as equally as important as the landscape setting of an area. Such spaces are green spaces found within the built-up area that contribute to the character of a settlement. These can vary in size, shape, location, ownership and use but such spaces will have some form of value to the community particularly for benefits to mental and physical health and wellbeing and help define what makes that specific settlement what it is.
- 11.45 The Neighbourhood Plan Steering Group have identified a number of spaces that would meet the criteria and should be protected because of their value to the local community. Each space has been assessed against the NPPF criteria. The result is the 11 spaces shown in figure 30 and listed within **Policy SAX15**. Assessments for each one against the criteria set out in the NPPF have been carried out and these are shown in **Appendix C**.



Suitable Alternative Natural Green Space (SANG)

- 11.46 The Habitats Regulations Assessment of the Suffolk Coastal Local Plan identified the need for Suitable Alternative Natural Greenspace (SANG) areas to mitigate the potential impacts of recreational disturbance on the Sandlings, Alde-Ore and Minsmere–Walberswick Special Protection Areas. The Local Plan Appropriate Assessment identifies the need for SANGS to be of high quality and design to deter visitors from popular sensitive sites, to be of a sufficient scale to deter driving to European sites and to accommodate circular walks that provide a varied and high-quality experience in terms of visual and other sensory factors. As mentioned in earlier sections, development within the District (and within the Neighbourhood Plan Area) will also be expected to contribute to the Recreation Avoidance and Mitigation Strategy.
- 11.47 To reduce the impact of the proposed Garden Neighbourhood development and alongside providing for sufficient SANG areas, the Local Plan policies require significant green infrastructure provision and areas of natural green space for recreation to be integral to the layout of the Garden Neighbourhood. Reflecting the heritage sensitivities and requirements for SANG, the Local Plan sets out that any uses to be delivered on land to the east of the railway to the south of the town, are to be open space/SANG provision only, however the Local Plan does recognise that on the land east of the railway there is scope for some existing agricultural uses to remain. The Local Plan policy also indicates that the provision of open space and enhancements related to provision of SANG do not need to be confined to land to the east of the railway. Alongside this, the delivery of an integrated network of green infrastructure is expected to be provided throughout the Garden Neighbourhood (see also **Chapter 12**).
- 11.48 The Neighbourhood Plan builds upon this strategic aim and seeks to protect an area of land to the south of the town and east of the railway line, which includes The Layers, as a significant area of SANG to perform the ‘avoidance’ function. The role of the SANG would be to provide avoidance measures for the potential impact of residential development of this kind on the SPA by preventing an increase in visitor pressure on the SPA. The effectiveness of SANG as mitigation will depend upon its location, design, and access. The SANG should be located to be easily accessible from the south of the town and access to it from the new housing area, will need to be in the north of the SANG area, where the only viable safe crossing point over the railway exists. The purpose of the SANG is twofold. It is required not only to ‘mitigate’ the new Garden Neighbourhood but also to ‘compensate’ for the change in access to the area that is currently enjoyed by residents of the town e.g. informal



recreation such as dog walking. The result must be such that the SANG is more attractive than the SPA to users of the kind that currently visit the SPA.

11.49 Natural England provides guidance on the identification and management of SANG. Given that the purpose is to make the SANG as attractive and accessible as possible for visitors there is an acknowledgement that there may be the need in the future for additional facilities to be provided, that are connected to the successful functioning of the SANG such as discreetly located car parking, visitor routes.

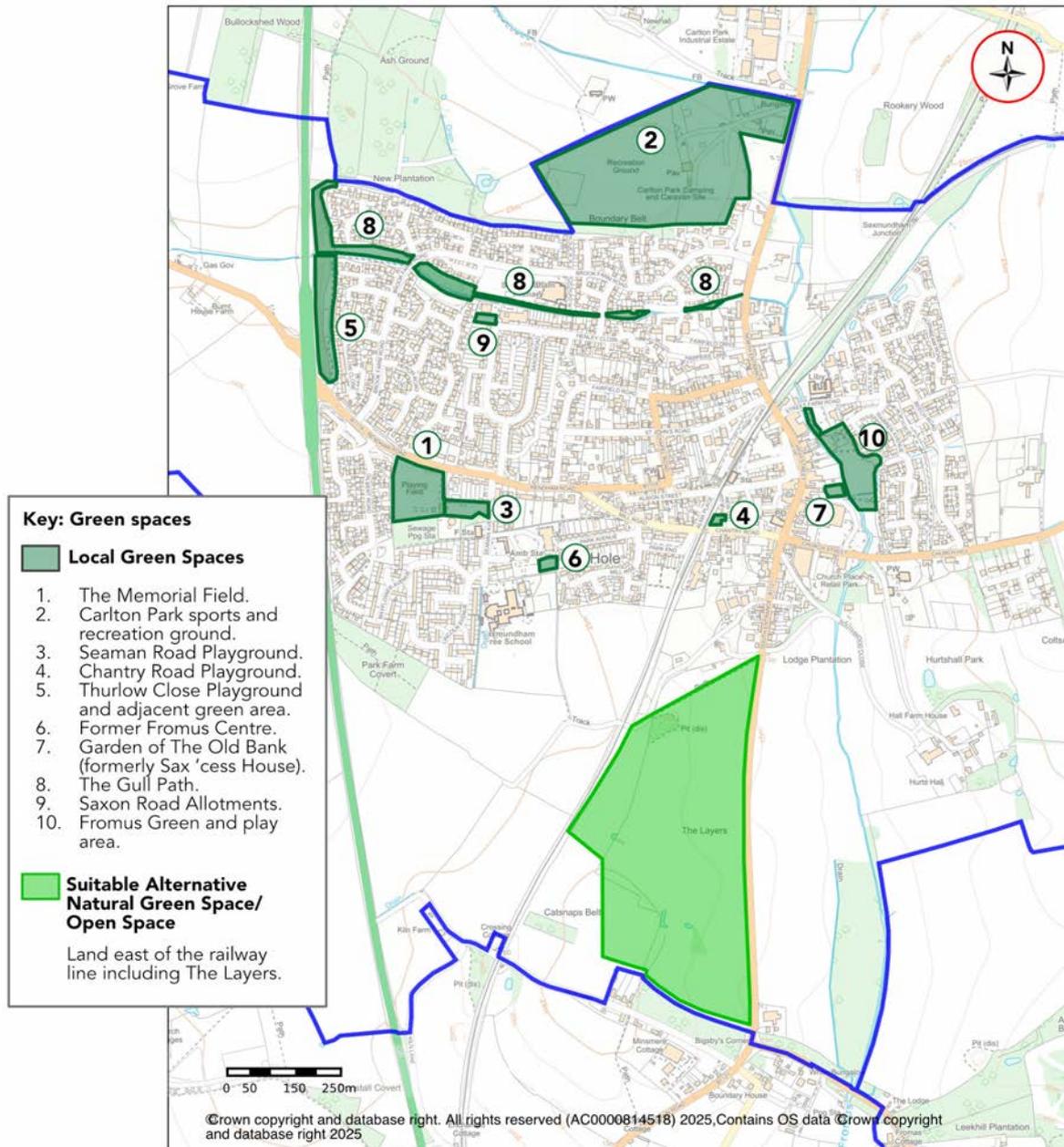


Figure 30: Local Green Spaces (source: Parish Online with own annotations). Blue line denotes parish boundary (amended map to include new parish boundary).

POLICY

SAX15: Green Spaces

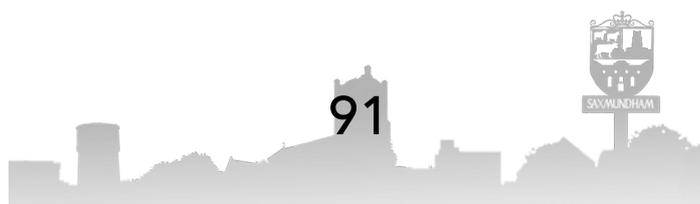
Local Green Spaces

The following are identified as Local Green Spaces (**figure 30**) where any proposals will be judged against the requirements which rule out development unless there are very special circumstances:

1. The Memorial Field.
2. Carlton Park sports and recreation ground.
3. Seaman Avenue Playground.
4. Chantry Road Playground.
5. Thurlow Close Playground and adjacent green area.
6. The Community Garden at the former Fromus Centre off Seaman Avenue.
7. Garden of The Old Bank (formerly Sax'cess House).
8. The Gull Path.
9. Saxon Road Allotments.
10. Fromus Green and play area.

Suitable Alternative Natural Greenspace (SANG)

Land east of the Railway line and to the south of Saxmundham, including land known as The Layers is identified as an area of open space and SANG, in connection with the South Saxmundham Garden Neighbourhood which will serve to meet the informal day to day recreational needs of both the new Garden Neighbourhood and the existing community whilst allowing for the retention of the existing uses of the land where it complements the delivery of the open space and the SANG, The location, design and access of the proposed SANG should take into account the purpose of the SANG, the need for easy and safe access to it together with potential impacts on landscape, biodiversity and heritage.



12. South Saxmundham Garden Neighbourhood

South Saxmundham Garden Neighbourhood

Objective SSGN1: To create a high quality, well designed, distinctive development in line with modern '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 approximately 67 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.

12.2 The designated Neighbourhood Area for the Modified Neighbourhood Plan includes the revised parish boundary and therefore the modified Neighbourhood Plan is able to include policies which are applicable to the Garden Neighbourhood.

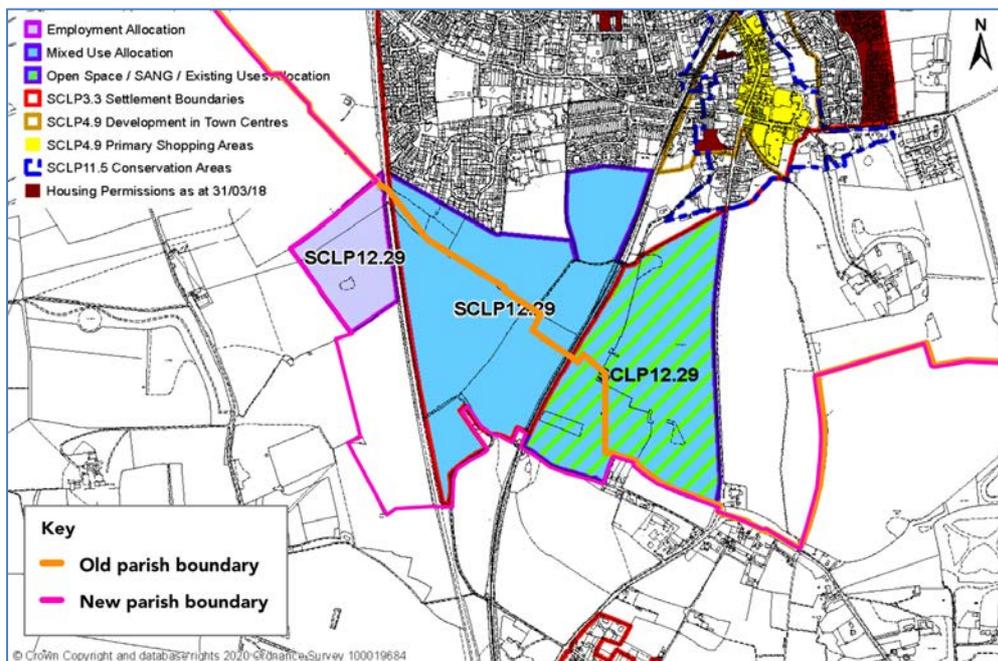


Figure 31:
Map of
Local Plan
allocations
with old and
new parish
boundaries
added

Strategic context for the Local Plan allocation

- 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 for 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. The Town Council believes that such a masterplan, produced with both the input of the landowners and through meaningful engagement with the community is essential to 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 including through the collaborative masterplan process outlined in the Local Plan.
- 12.4 Policy SCLP12.29 of the Local Plan allocates 67 hectares of land for a mixed use development including residential, employment and community uses. The policy outlines that the Masterplan should include the following elements:
- Approximately 800 dwellings.
 - Primary school with potential for expansion for early years provision - on a site of 2.2ha of which 0.1 ha reserved for early years setting.
 - Community hub.¹⁶
 - A significant area of Suitable Alternative Natural Greenspace - the area of land east of the railway is identified for the provision of open space and Suitable Alternative Natural Greenspace (SANG).
 - Green infrastructure, including informal and formal open spaces, circular walks.
 - Formal recreation areas for all ages, including play space.
 - Design and layout, which supports a dementia friendly environment.
 - Provision of new vehicular access point from the A12 supported by safe access for cyclists and pedestrians.
 - Significant pedestrian and cycle accessibility throughout the site with connections and improvements to networks beyond the site, including to the station and town centre.

¹⁶ For the purposes of this policy services and facilities could include convenience store, shops, meeting places, allotments, education facilities, care facilities and medical facilities.

- Employment land to the west of the A12.

12.5 The Local Plan provides an indicative concept draft masterplan diagram which gives a broad indication of where various elements of the Garden Neighbourhood may be located. Within the allocation it is envisaged that there will be areas of residential/ mixed use development, areas of woodland, informal and formal open space, existing mature hedgerows and tree belts and a number of pedestrian and cycle accesses from the town into the Garden Neighbourhood. The allocation provides for a community hub located within the residential/mixed-use area, and a separate employment area. The indicative masterplan in the Local Plan assumes that a new primary school will be located within the residential/mixed use areas but does not give a specific location. 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 only (and not for built development), the siting and layout of the new development is left for the collaborative master-planning process to address.

12.6 Suffolk County Council have advised that: "This site has high archaeological potential. It is situated in a favourable location for archaeological activity, overlooking the River Fromus on an area of light soils. To the north, in a similar topographic location, prehistoric and Anglo Saxon settlement has been identified. Within the site, an undated double line cropmark runs the length of the site parallel to the river. Finds of Iron Age, Roman, Anglo Saxon and medieval date have also been recorded from immediately adjacent fields. Geophysical survey has been undertaken and further archaeological assessment is required". Suffolk County Council have also highlighted that archaeological assessment should be required to inform viability of schemes, mitigation requirements and conservation in situ of significant remains. Any mitigation should involve outreach proposals. There should be early consultation with the Suffolk County Council Archaeological Service (SCCAS) regarding proposals.

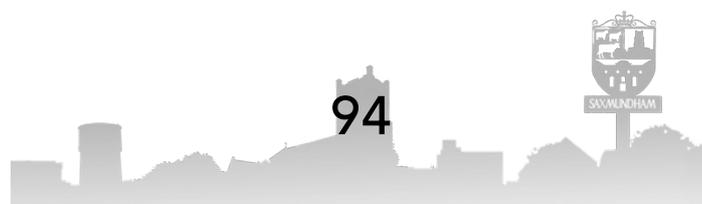




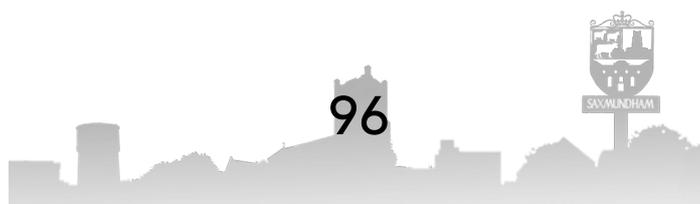
Figure 32: South Saxmundham Garden Neighbourhood, indicative draft masterplan from the Local Plan. Note: indicative draft masterplan assumes new primary school within the residential/mixed use areas (source: Area Specific Strategies, Suffolk Coastal Local Plan, Adopted September 2020).

Proposed Employment area west of A12

12.7 As shown in the indicative masterplan from the Local Plan above, an area located west of the A12 is identified for employment uses to provide opportunities for jobs, designed in the context of a Garden Neighbourhood. Given the location of the allocated employment area directly adjacent to the A12 and its wider visibility in the landscape, any proposed buildings on the site should be designed to integrate and assimilate into the wider landscape. Furthermore any lighting schemes should be limited to that which is required for security and safety purposes for the operation of those employment uses. Proposals should seek to prevent light pollution through the use of energy efficient technologies, down lighting, timers and minimising adverse impacts on wildlife. Any new development proposed outside of the allocated area would be considered to fall within 'open countryside' and would be subject to the relevant policies in the Local Plan. Proposals for additional employment/commercial land uses here would need to demonstrate that a need for the type and size of such uses exists and that these can only be accommodated in this location and not elsewhere e.g. an existing employment site or the town centre. Any landscape impacts would be required to be successfully mitigated.

Changing context relevant to the Garden Neighbourhood – School Site

- 12.8 A significant change in circumstances since the Neighbourhood Plan was first prepared has been the closure of the secondary school in August 2024. The school site is located on the edge of the existing built up area accessed off Seaman Avenue and lies immediately north of the Local Plan allocation. It is within the settlement boundary for the town. The site comprises former secondary school buildings, car parking area, areas of hardstanding, and 2.8 hectares of playing fields and sports pitches. The site lies outside of the Local Plan allocation. However the location of the former school site and its proximity to the Garden Neighbourhood development opens up potential possibilities which could be explored in terms of creating more effective connections between the Garden Neighbourhood and parts of the town. The site is currently vacant and has been promoted by Suffolk County Council for Special Educational Needs and Disabilities (SEND). If approved it is anticipated that only part of the site would be required for this purpose, with part of the site remaining with potential for other uses. The site is important because of its size and location and offers potential significant opportunities to benefit the community in terms of the reuse of the buildings and the site for indoor recreation, recreational community use of the existing playing fields, as well as providing additional connections between the Garden Neighbourhood and existing areas of the town.



section have been informed by community consultation undertaken as part of the development of the 'Made' Neighbourhood Plan

12.10 The ambition for the site is to create a high quality, well designed, distinctive new development in line with modern Garden City principles¹⁷ which is valued by its residents and recognised as an asset to the town. Moreover, for its future inhabitants, the Garden Neighbourhood should:

- Foster a strong sense of community.
- Encourage positive social interaction.
- Create a sense of pride for the neighbourhood.
- Be a happy home where people can feel safe and secure inside and outside.
- Be a neighbourhood that demonstrably cares for all its living inhabitants – human and others.

12.11 Green infrastructure could contribute to this ambition for example 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.

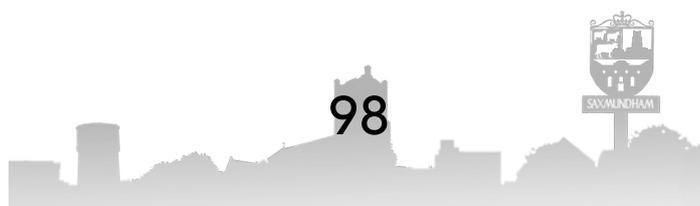
12.12 This will be achieved through the adoption and implementation of the following key development principles for the area:

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

12.13 It remains critical to the success of the Garden Neighbourhood that it should be seamlessly and successfully integrated with the existing community of Saxmundham. In order to create a full sustainable Garden Neighbourhood 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 –

¹⁷ based on those of the Town and Country Planning Association (TCPA) – the original founders of the Garden City movement. <https://www.tcpa.org.uk/the-foundations-of-the-garden-city-movement/>



pedestrian and cycle – to promote easy, safe and quick access between the town and the development and also between the development and the town’s facilities e.g. the town centre and the railway station.

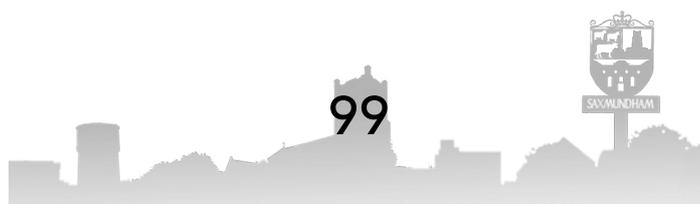
- Environmental – in terms of high-quality green infrastructure connections, corridors and links between the Garden Neighbourhood and the town; and the Garden neighbourhood and the surrounding countryside; the design and layout of the Garden Neighbourhood to reflect local character.
- Social – a strong 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.

12.14 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 predominantly green character for the area, e.g. through its overall design, layout, landscaping, public facilities and green spaces and infrastructure.

Connecting the Garden Neighbourhood

12.15 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, (b) how well it provides for excellent connections and movement within the Neighbourhood and c) how well the employment areas are connected to the Garden Neighbourhood and also to the countryside beyond. 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, (b) within the Garden Neighbourhood itself, c) between the residential areas of the Garden Neighbourhood and the proposed employment and commercial areas west of the A12, and (d) between the Garden Neighbourhood and Benhall.

12.16 The only vehicular access route to and from the Garden Neighbourhood to the existing town is indirect, via the A12. Due to this single vehicular access, the success of the site is significantly dependent upon reducing/minimising car use and maximising other forms of transport, such as public transport and community transport to ensure less congestion and safe traffic flow.



Convenient and attractive, direct, well sign-posted pedestrian and cycle connections to the town (including town centre, station, residential areas and employment areas) must be provided sufficient in number and of high enough quality if they are to be a realistic alternative. Such links will also serve to further other aims, including promoting health and well-being. However a number of key accesses, which could achieve this, are not in the same landownership as the Garden Neighbourhood site and therefore not within the control of the developer e.g. land to the west side of the school and land at the cemetery.

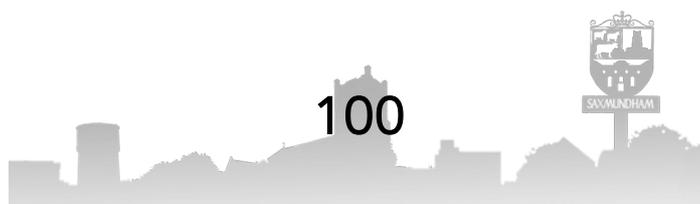
Connecting the Garden Neighbourhood to the existing town and community

12.17 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 – and if practicable four - new and/or upgraded connections are required:

- a. to the station,
- b. to the town centre,
- c. to existing residential area to the north-west of the Garden Neighbourhood site, via the existing footpath to the east of the former school, and also
- d. (so far as practicable) via a direct link to Lincoln Avenue and Seaman Avenue.

12.18 The most direct link to the station is via the eastern edge of the cemetery (via a new cycle/footpath) and on to the road network. Creating this link is seen as essential. The shortest link to the town centre and its facilities, including its supermarkets, is via the existing footpath over the railway bridge down to South Entrance, which will need to become a cycle path. The junction with South Entrance (B1121) should be improved to ensure safe transition to the road network. It is also essential to provide easy non-vehicular access to and from the adjacent residential areas to the northwest of the site. This access is already envisaged via an upgrade to the existing footpath to the east of the old school site, which is due to continue as a cycle path, through the (to be developed) former Fromus Centre site to Seaman Avenue. More direct links are potentially available e.g. to/from Lincoln Avenue but realising these would require discussion with the relevant land owners of the access strips of land.



Connections and movement within the Garden Neighbourhood

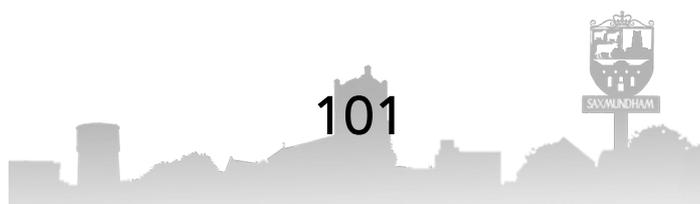
12.19 The creation of the Garden Neighbourhood provides the opportunity to encourage and facilitate use of sustainable transport, in particular walking and cycling, and to promote exercise for health and well-being. Connections within the Garden Neighbourhood in particular, including a central cycle/pedestrian avenue running from the northeast of the site, around the site and into and out of the Garden Neighbourhood, including to the town centre itself, should create places that are safe, secure and attractive to users. This is not just in terms of their visual quality, but also in terms of their scope to minimise conflicts between pedestrians, cyclists and vehicles by avoiding unnecessary street clutter which reflects local character and design standards.

Connections between the residential areas of the Garden Neighbourhood , the proposed employment area west of the A12 and to the wider countryside

12.20 To ensure that all areas of the Garden Neighbourhood are well-integrated and that the wider strategic connections between the existing town and the countryside are enhanced, pedestrian and cycle crossings of the A12 will be required as follows:

- a. New pedestrian, cycle and road crossing of the A12 to the employment land.
- b. An enhanced pedestrian and cycle crossing from the strategic footpath and central cycle route running through the new neighbourhood and connecting to the countryside west of the A12.

12.21 **Policy SAXGN1** below has been developed to take account of these issues.



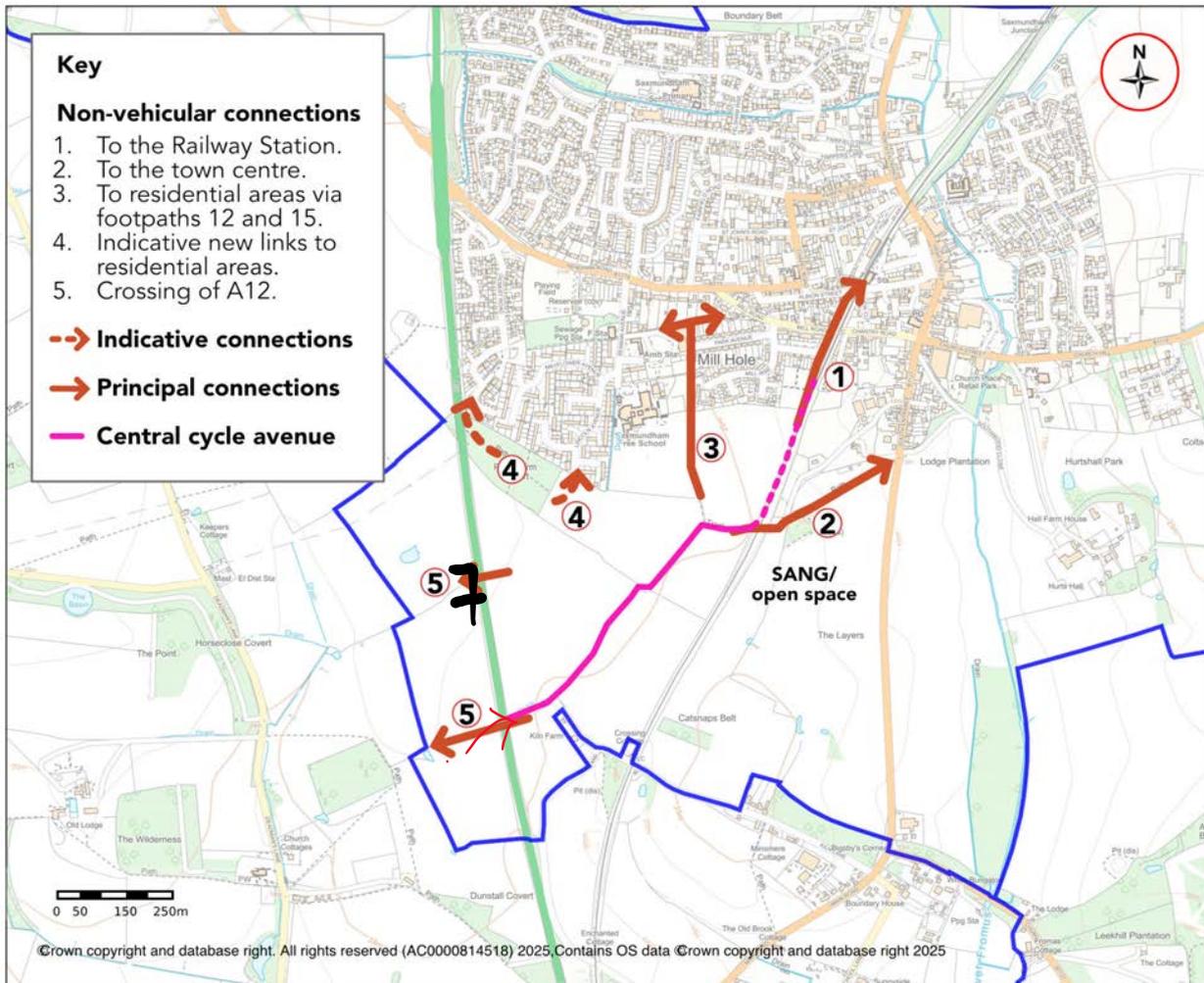


Figure 34: Connections (source: Parish Online with own annotations). Blue line denotes parish boundary.

POLICY	<p>SAXGN1: Connecting the Garden Neighbourhood</p> <p>Development proposals for the Garden Neighbourhood will be expected to ensure that excellent connectivity, is provided for all users, including those with a mobility impairment, in particular:</p> <ol style="list-style-type: none"> a. between the existing town and the Garden Neighbourhood, b. within the Garden Neighbourhood itself, and c. between the residential areas of the Garden Neighbourhood, the proposed employment area west of the A12 and to the wider countryside. <p>Pedestrian and cycle movement between the Garden Neighbourhood and the existing town is prioritised over vehicular movement through the provision of</p>
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connections, sufficient in number and of the highest quality. They must be convenient and direct, in order to reduce reliance on private motor vehicles.

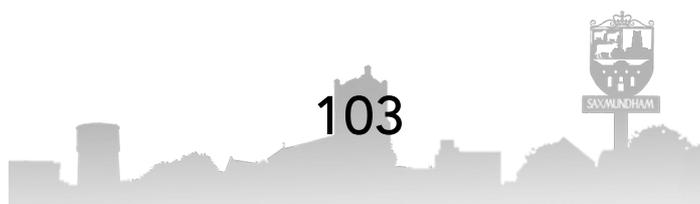
This provision will be in the form of well designed, attractive and safe to use (including appropriate lighting), new pedestrian and cycle linkages and the enhancement of existing routes including making new connections and links where appropriate. New cycle linkages to be built to the standards set in LTN 1/20 Cycle Infrastructure Design.¹⁸ 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 should include:

- i. Connection between the Garden Neighbourhood and the railway station. This should be achieved through a new cycle and pedestrian route from the development via the cemetery along the west side of the railway, or another route offering similar direct linkage.
- ii. Connections between the Garden Neighbourhood and the town centre (including supermarket area). This should be achieved through an improved cycle and pedestrian route to and from south entrance, up to the existing bridge (where cyclists would dismount and use the footpath over the railway) to provide easy and swift access to and from shops and facilities. The existing railway bridge should be enhanced as a footpath and where practicable to also include a cycleway.
- iii. Connections to the surrounding residential areas and schools. These should be achieved via:
 - a. the existing footpath to the east of the former school playing field (footpaths 12 and 15 Saxmundham), upgraded appropriately, and leading to and from Seaman Avenue and Mill Road, and
 - b. (as far as practicable), a new cycle and pedestrian route to the west of the school playing field which would 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.

¹⁸ Cycle infrastructure design (LTN 1/20), <https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120>.



Improvements, such as those above, to pedestrian and cycle connections will continue to be sought, where appropriate, from future developments to support the delivery of safer and more attractive options for local travel.

Public Transport (including community transport)

- iv. The site access must be able to accommodate buses to easily serve the site including bus linkages to the town centre and supermarket area including consideration to be given to the potential to connect with Seaman Avenue west of the school site. New bus stops should be provided within easily accessible locations.

Connections and movement within the Garden Neighbourhood

Proposals for development of the Garden Neighbourhood should promote the use of sustainable transport modes, as appropriate, including for exercise for health and well-being, as set out below:

- v. The 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, given the singular vehicle access proposed from the A12.
- vi. A central cycle avenue running through the residential areas, which uses the existing public footpath network and runs alongside the green corridor, and extended to the cemetery, should be provided linking to the Public Rights of Way network across the A12.
- vii. The provision of a circular green route is encouraged around the main housing areas of the site between the railway line and the A12 for use by pedestrians.
- viii. Good quality walking and cycling links to and from Benhall, utilising and improving existing Public Rights of Way, should be created
- ix. The existing rail crossing bridge and footpath shall be retained and upgraded for safe cycle and pedestrian use and access to the main SANG area.

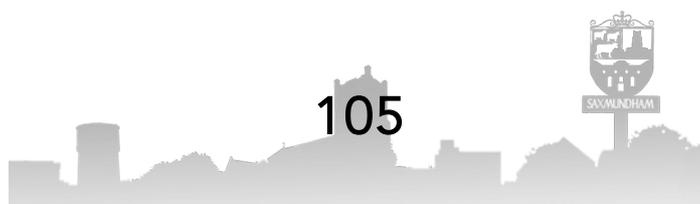
Connections between the residential areas of the Garden Neighbourhood to the proposed employment area west of the A12 and to the wider countryside.

- x. Safe connections for all users should be provided between the residential areas of the Garden Neighbourhood and the proposed employment area west of the A12, linking to the countryside beyond.
- xi. 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.

Green infrastructure

- 12.22 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 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. Within the site, as much as possible of the existing hedgerows and other green infrastructure should be preserved.
- 12.23 New Green links will be required along the edges of the site to create green corridors, mitigate any noise disturbance and connect with surrounding assets (countryside, Suitable Alternative Natural Greenspace (SANG), existing settlement, High Street). The Local Plan proposes that the area east of the railway but adjacent to the town, is for 'open space' and SANG (with some to remain 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 help to encourage walking and cycling.



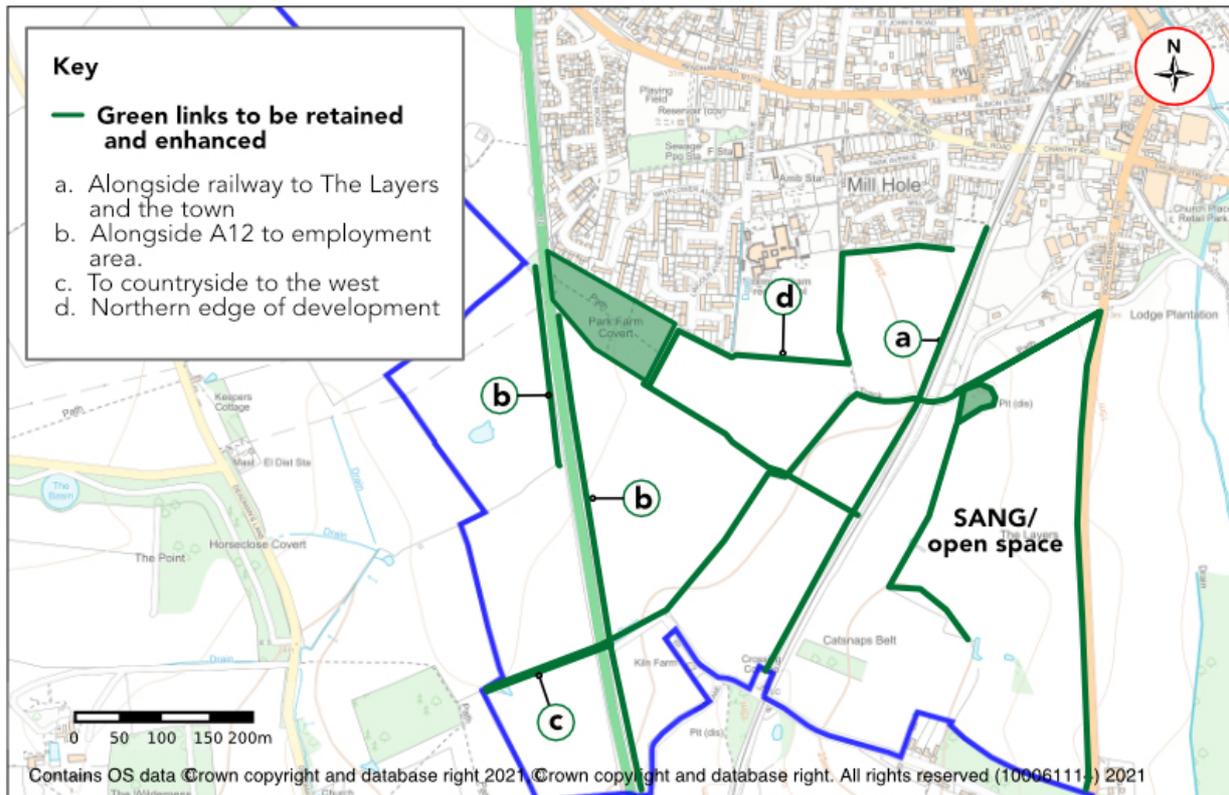


Figure 35: Green links (source: Parish Online with own annotations). Blue line denotes parish boundary.

12.24 A range of green spaces will need to be provided for example, formal parks, play areas, a public square, informal greens, allotments or community gardens. Other facilities such as shelters, public toilets and other facilities may need to be investigated in some specific green spaces; and a circular green route around the main housing site would enhance the green ‘feel’ and promote walking and cycling. The use of Sustainable Drainage Schemes (SuDS) such as drainage lagoons, attenuation basins and swales should be used to provide drainage but also to provide benefits for biodiversity and landscape. Further guidance is included in East Suffolk’s Health Environments Supplementary Planning Document (SPD).

<https://www.eastsuffolk.gov.uk/assets/Planning/Planning-Policy-and-Local-Plans/Supplementary-documents/Healthy-Environments/Healthy-Environments-SPD-Adoption-version.pdf> and [Healthy-Environments-SPD-Adoption-version.pdf](#)

POLICY

SAXGN2: Green infrastructure

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

New development within the Garden Neighbourhood should link the town and the new community through the use of green infrastructure. 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, to the wider countryside and east to the Layers.
- ii. A well landscaped green corridor to be created along the northern boundary of the Garden Neighbourhood.
- 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.
- iv. The existing hedgerow structure of the site should be retained insofar as it is practicable to do so, and this should influence the design and layout of the proposed housing areas. 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 main housing site, adjacent to the A12, to provide a soft landscaped edge to the development and the opportunity for recreational pedestrian and cycle routes and noise mitigation.
- vi. New allotments, community gardens or community orchards should be provided within the new neighbourhood.
- vii. The inclusion of 'green corridors' to allow the passage of wildlife through and within the neighbourhood.
- viii. Green infrastructure should be provided on the proposed commercial/ employment area to the west of the A12 which could include the enhancement of the existing pond on site, new hedgerows and new footpath connections to the wider countryside beyond.

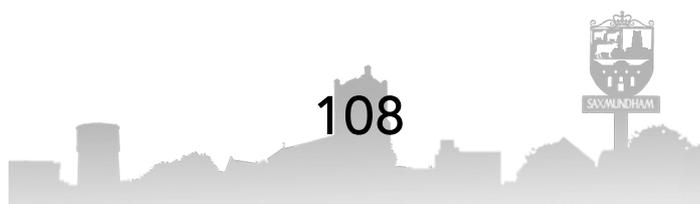


ix. High-quality SuDS¹⁹ provision should be made across the development that ensures green, open SuDS are provided within residential areas that integrates well into the green infrastructure. SuDS should enhance the amenity and biodiversity of all areas they are integrated, in addition to their functions of volume control and treatment.

Community facilities

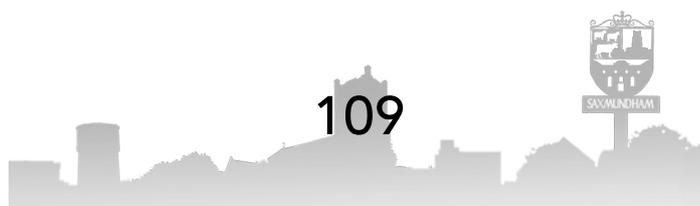
- 12.25 A range of requirements are highlighted in the Local Plan policy as needing to be delivered to support the growth of the Garden Neighbourhood. These are set out earlier. The Local Plan provides an indicative draft masterplan layout. The proposed community hub (or local centre) is shown as centrally located within the Garden Neighbourhood in the Local Plan. In order to function successfully as a hub the facility needs to relate well to and be easily accessible from the rest of the development, by all modes of transport. It is considered that there would be advantages for the more commercial parts of the 'local centre' to be located next to the main vehicular entrance to the site, close to the A12, welcoming visitors and residents, including those from the employment areas. It will need to serve as a local shopping function, with open spaces and visitor facilities, in a location where it can be easily seen from the main road (A12) attracting drivers passing by and enhancing viability. A separate 'community hub' would be provided elsewhere in the site which could take the form of an outdoor meeting space, or well-designed focal point and potentially including a community café.
- 12.26 There is no specific location for the new primary school indicated in the Local Plan. However the former secondary school site is located immediately north of the proposed Garden Neighbourhood and there is some logic that would support locating the primary school close to that facility particularly if the site were to be retained in some form of community or educational use such as a SEND School and/or facilities for indoor sports and recreation. The location of the primary school in this area would also mean it is within easy walking distance from the existing and the new communities.
- 12.27 Community consultation undertaken as part of the production of the Made Neighbourhood Plan revealed that indoor sports provision and additional medical facilities were the key priorities for future development to provide.

¹⁹ See glossary for SuDS definition



Paragraph 3.32 of the Local Plan acknowledges that consultation on the Local Plan highlighted the need for improvements to the capacity of the medical practice. Given the priority that the community ascribes to these two issues, the Town Council will continue to lobby for the delivery of proposals to address both to ensure that the development of the Garden Neighbourhood responds positively to the community and maximises the opportunity (including that presented by the availability of the former secondary school site), to provide indoor sports facilities where they can easily serve the new and existing communities (see also **Policy SAX5**).

12.28 The town has outdoor sports facilities at the northern end of the town, at the Sports and Recreational Club at Carlton Park. However, it has no indoor sports provision of any kind. The provision of an indoor sports centre facility, in the southern area of the extended town, and reasonably accessible to residents of both the new Neighbourhood and of the existing town, would provide a much-needed resource, help to promote healthy lifestyles, and assist in the aim of integrating the new development in the community life of the town.



POLICY

SAXGN3: Community facilities

The creation of the new Garden Neighbourhood will be supported by the provision of the following important community infrastructure.

Primary school and associated early years setting

Consideration to be given to being located to the north of the site to allow for physical and social connectivity with the existing community affording opportunities to enhance the proposed green corridor in the north of the site (see **Policy SAXGN2 ii**) above). Both facilities to be accessible by high quality walking and cycling routes.

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 early-years settings can be sustainable in the long term; and to be accessible by high quality walking and cycling routes.

Community hub

To be located where it can best meet the needs of residents of the neighbourhood and the communities beyond. Located preferably with good connections 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 network.

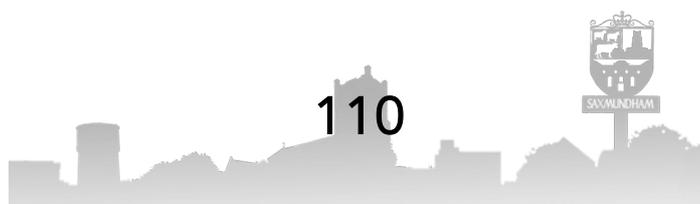
Recreational facilities including play areas

To be located across the development and catering for different age groups.

Proposals for otherwise acceptable, additional **indoor sports provision** within the Garden Neighbourhood including those which utilise the former secondary school site will be strongly supported. Such facilities should be easily accessible from both the town and the Garden Neighbourhood by high quality walking and cycling routes (**see also Policy SAX5**).

Design of the Garden Neighbourhood

12.29 **Policy SAX1** of the made Neighbourhood Plan sets out the general design principles which all new development in the parish should have regard to. This



also includes the detailed guidance set out in the Design Guidelines for the Neighbourhood Area which is included as **Appendix E** of this Modified Neighbourhood Plan.

- 12.30 The guidance is consistent with national design advice as outlined in the National Model Design Code, and the National Planning Policy Framework.
- 12.31 The design principles contained in **Policy SAX1** can be easily applied to the Garden Neighbourhood Site, however this is relatively high level and the scale of development proposed in the Garden Neighbourhood also warrants some detailed guidance to ensure that the original objectives for the site, as set out in the Local Plan allocation, are met.
- 12.32 Policies SAXGN1 and SAXGN2 cover the strategic issues of connectivity and green infrastructure, whilst Policy SAXGN3 covers issues relating to community facilities within the Garden Neighbourhood. There remains a gap in policy relating to the detailed design of the site which sits between the strategic guidance set out in **Policy SAX1** and any masterplan for the site. The following policy aims to fill that gap.

Design and the Garden Neighbourhood

- 12.33 The southern extent of the Neighbourhood Area, where the Garden Neighbourhood has been located, currently consists of open fields, woodlands and water elements. New development should take the existing local character of wider Saxmundham into careful consideration. The design of the Garden Neighbourhood should consider scale, layout, density, mass, materials and architectural features, as well as incorporate a high standard of landscaping to add to the quality of the area. The existing building typologies in the parish can also be reflected in the new development where this provides a positive contribution to the new neighbourhood and existing character of Saxmundham. In particular, there is a variety of building types in the Neighbourhood Plan Area; for example terraced housing, semi-detached, detached and bungalows. It is important that this mixture of types of housing is retained and promoted in new development in order to create variety and interest in the streetscape. The architectural styles, details and materials of the existing Saxmundham settlement should act as a reference for the new development to promote local distinctiveness. The new development also offers a significant opportunity for more distinctive, innovative and contemporary approaches to design and architecture, within the overall mix of typologies. The aim is for the Garden Neighbourhood to be recognised as a



design leader in terms of sustainability, energy efficiency and technological advancement.

12.34 **Policy SAXGN4** below seeks to set out more tailored design guidance for the layout and design of the new garden neighbourhood and builds on the existing Neighbourhood Plan **Policy SAX1**, and the Design Code, to provide this.

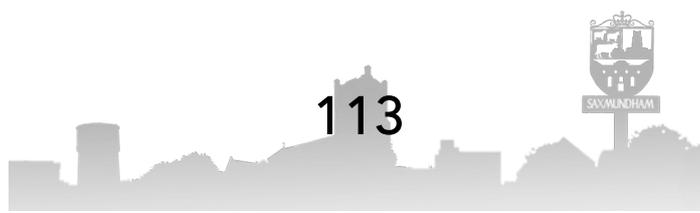
POLICY	<p>SAXGN4: Design of the Garden Neighbourhood</p> <p>This development will be a very significant enlargement of Saxmundham and as such will be expected to be imaginative and innovative and make a positive contribution to the character of the town and the range of housing on offer. It should be a high quality, well designed, distinctive development which is physically, environmentally and socially well connected to the existing town and community of Saxmundham.</p> <p>There are limited views from the town towards the site, however, the development of the site presents opportunities for original and contemporary design solutions as well as more traditional schemes.</p> <p>The objective is for a distinctive, environmentally and technologically advanced development which will be an asset to the town of Saxmundham. To achieve this it is expected that standards of building, layout and design will exceed minimum standards.</p> <p>Proposals for the Garden Neighbourhood should have regard to the design guidelines for the Neighbourhood Plan area, in Appendix E.</p> <p>Proposals should, so far as relevant to the context, accord with the following criteria:</p> <p>STREET DESIGN AND PARKING</p> <p><i>Layout</i></p> <ol style="list-style-type: none"> 1. The site should be developed as a series of neighbourhoods, each with its own distinctive character, in terms of layout, materials, building design and public realm detailing. The whole to be drawn together and connected by the diagonal cycleway/footpath.
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2. The central cycle/footpath avenue through the Neighbourhood including associated landscaping and public open space is to be designed as a whole and form a principal component of the layout.
3. Green verges should be provided along the main street with large street trees to provide shading and create a 'garden' neighbourhood feel. These verges should also be integrated into the SuDS strategy to provide multifunctional benefits.
4. Where appropriate, on-street parking should be interspersed with trees to avoid impeding moving traffic or pedestrians and also mitigate the visual impacts of vehicles.
5. Front gardens should be provided; they are a key element which contribute to the openness of the streetscape with rich vegetation and planting. Use of front gardens as additional car parking should be discouraged.
6. Corner buildings should function as landmarks to create memorable routes.
7. Cul-de-sacs should be avoided but where they are proposed these should be connected to the footpath network in the area through pedestrian orientated routes.
8. When a street is proposed adjacent to the countryside or a large open space, a sensitive landscaping scheme should be developed to enable transition and control pedestrian accessibility. Such landscaping could also be used for swales, rain gardens and small attenuation features to contribute to a high-quality SuDS.
9. The use of hedgerows where dwellings or streets face onto agricultural land is particularly encouraged.

Car and cycle parking

10. Residential parking should be provided on plot and to the side, with convenient Electric Vehicle charging points in preference to rear parking courts. Garages should be sized in accordance with Suffolk parking standards.
11. Car parking design should be combined with meaningful landscaping a minimum of every 4th parking space to minimise the presence of vehicles.
12. Parking should be placed in well overlooked areas., Where rear parking courts are proposed, these should be secure and active frontages provided where possible. Flats over garages (FOGs) is one way in which this could be achieved. Parking should not dominate the street scene.



13. Parking areas and driveways should be designed to minimise water run off through the use of raingardens, tree pits and permeable paving.
14. The provision of secured covered cycle parking within all residential developments is encouraged.
15. Encouragement is also given for publicly available cycle parking in the public realm.

Landscaping and tree planting

16. Mixed native, hedgerows can be planted in front of bare boundary walls to ease their visual presence, or they can be used to conceal on plot car parking and driveways within curtilages.
17. Where flower beds, bushes and trees are to be planted within front gardens, ornamental species add interest and colour to their surroundings and become an identity and character to individual dwellings.
18. Trees should be added to any public open space, green or play area to generate environmental and wildlife benefits.

Lighting

19. Any new development shall ensure that lighting schemes will not cause unacceptable levels of light pollution particularly in intrinsically dark areas of the countryside but must be adequate to ensure a safe environment for pedestrians and cyclists in the dark. Lighting and light levels should be minimised to 3000K or below (i.e. on the warmer spectrum of light, while delivering the same illumination. The use of lighting, such as blue LED light, which has a negative effect on biodiversity,²⁰ health and wellbeing, should be avoided.

Mitigating the impact of the A12

20. Where new dwellings are proposed close to the A12, suitable noise mitigation measures should be employed. The road edge should be softened with planting, and dwellings should be orientated such that habitable rooms and gardens are located furthest from the noise sources. Where apartments are provided in areas at risk from noise impact, the apartments are dual-aspect. Noise attenuating road surfaces should be incorporated.

²⁰ The Institute of Lighting Professionals and Bat Conservation Trust Guidance Note 08/23 - Bats and Artificial Lighting at Night is where guidelines for artificial lighting for bats can be found.



Mitigating the impact of the railway line

21. Layouts adjacent to the railway line should incorporate planting for noise mitigation. A landscaped pedestrian path should also be provided, as part of the proposed circular route around the entire site, which will add additional noise mitigation. Dwellings should be orientated with habitable rooms located furthest from the railway line. Where apartments are provided in areas at risk from noise impact, the apartments are dual-aspect.

BUILT FORM AND BUILDING DESIGN

22. Buildings should be fronted onto streets and maximise passive building design (see paragraph 34). Building lines will vary according to the relevant character area.
23. Buildings should be designed to ensure that streets and/or public spaces have good levels of natural surveillance from buildings. This can be ensured by placing ground floor habitable rooms and windows facing the street. Windows should be used to increase the natural surveillance of the public realm and enhance the attractiveness of the street scene. They should be constructed using sustainable materials. Corner buildings should incorporate windows on both primary and secondary facades. Long stretches of windowless walls should be avoided. Windows should be of sufficient size and number to allow an abundance of light.
24. New buildings should be sympathetic in mass, height and scale to the rural location. Subtle variation in height is encouraged to add visual interest. Buildings reflecting the local vernacular should avoid pastiche.
25. Services and utilities such as meter boxes, guttering, drainpipes and EV chargers should be carefully located to avoid visual clutter on the front of buildings.
26. Driveways, paths and pavements should use materials which are robust, aesthetically pleasing and with excellent weathering characteristics, defining a sustainable and attractive place for residents and visitors.
27. Materials for new buildings should be of a high quality and reinforce local distinctiveness. Materials should be selected based on an understanding of the local built and natural environment including those materials which have less embodied carbon.

The Employment Area

28. The Employment Area is an integral part of the Garden Neighbourhood and as such should have commensurate levels of high-quality landscaping, a green infrastructure network and easily signed access to the wider countryside.
29. Employment buildings should have a high level of energy efficiency and incorporate design features where practicable such as ground and air source heat pumps. Roofs should maximise solar panel gains. They should be of contemporary design with a variety of buildings of limited height, designed with flexibility in mind to address a range of commercial uses to ensure their compatibility with the Garden Neighbourhood.

Environmental and Energy design

30. Energy efficient and eco design features should be incorporated into all developments at the design stage and include such elements as triple glazing, above standard insulation, grey water capture, air source heat pumps, and mechanical ventilation heat recovery (MVHR). Solar conversion materials (panels, shingles, integrated solar roof tile systems etc.) should be included in the design of all buildings, similarly satellite dishes or other external features should be included at the design stage and positioned unobtrusively.
31. Elements such as water management features, flood resilience and resistance features and energy efficiency features are to be included. The use of renewable/non carbon energy solutions such as air and ground source heat pumps, district heating and solar panels are essential throughout. Developers are encouraged to provide a commitment to the operational targets of the new homes which should be consistent with the LETI Climate Emergency Design Guide.
32. Buildings should be orientated and designed to manage solar gain, daylight and sun penetration, whilst avoiding overheating.
33. All dwellings should be provided with an EV charger.

Innovative and contemporary building design

34. Innovative and contemporary design solutions of high quality (including self-build housing), where they also exemplify high standards of sustainability in environmental and energy design, will generally be supported. These may where appropriate form part of character areas within which they may offer a design contrast to other buildings that adds to the overall positive design impact.

Gateways

35. The pedestrian/cycle access points linking the new development to the existing town are important gateways into the Garden Neighbourhood and should be designed to take advantage of the opportunities that these give to create distinctive, welcoming spaces and creative physical design elements. The entry points to the development site from the Railway Station, and from the town via the single-track railway bridge, are particularly important in this respect. The vehicular access into the neighbourhood should be attractive, inviting and well signposted.

Density

36. Densities should be sensitive to Saxmundham and its context. Subtle differences in densities within character areas will be tolerated, provided that they are in keeping with the wider context. The highest densities should in general be positioned at the north of the site, adjacent to the existing town settlement and progressively lower densities created towards the southern boundary to provide a soft, green transition between development and countryside.

Waste and Recycling Storage

37. All residential properties should be designed with convenient, secure, and visually unobtrusive storage for general waste and recycling bins. Bin storage areas should be located away from the primary street frontage where possible and screened using planting, fencing, or built enclosures that are in keeping with the overall design of the development. Provision should also be made for accessible collection points that do not obstruct pavements, and consideration should be given to 'bin drag distances',²¹ the gradient and surfacing to ensure ease of movement for residents and waste collection services.

²¹ Guidance from Suffolk Waste Partnership



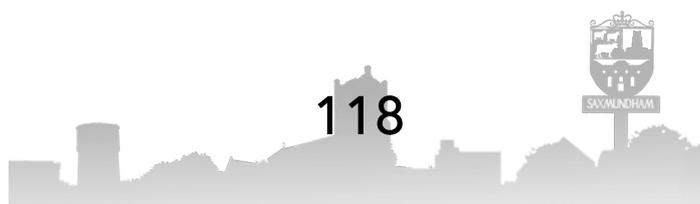
13. Mitigating the impacts of National Infrastructure and Energy Projects

Objective EN1: To ensure that the necessary measures required to mitigate the physical, visual, social and biodiversity impacts of National Infrastructure and Energy Projects are identified and implemented.

- 13.1 Areas of East Suffolk have been identified for a number of Nationally Significant Infrastructure Projects also known as NSIPs. These relate to national scale projects brought about by the significant generation and connection infrastructure required to deliver net zero carbon emissions in the UK by 2050. The resources and conditions in East Suffolk for fixed foundation offshore wind and interconnectors have made the area favourable to developers. Concerns have been raised about the significant number of projects proposed for the area and their cumulative impact.
- 13.2 NSIPs by their very definition are significant in scale and also in impact. Proposals for such developments are determined by the Secretary of State as advised by the Planning Inspectorate. The NSIP process is a prescribed process and is set out in regulation²². The District Council, County Council and Saxmundham Town Council are statutory consultees (along with a range of organisations including the environmental bodies such as the Environment Agency, Natural England and Historic England). Decisions on such projects are made at a national level; however the Secretary of State (SoS) must have regard to any Local Impact Report (LIR) submitted when deciding the application. The County and District Councils will each (or jointly) produce a Local Impact Report on each NSIP in their administrative boundaries. As per the Planning Inspectorate's advice note for Local Authorities²³, the LIR is expected to contain (amongst other matters) an appraisal of the project's compliance with all relevant local planning policy and guidance. Once made,

²² <https://www.gov.uk/guidance/introduction-to-national-infrastructure-planning-guidance>

²³ <https://www.suffolk.gov.uk/planning-waste-and-environment/major-infrastructure-projects-including-nsips>



the Neighbourhood Plan forms part of the local development plan and will thus be included in the LIR.

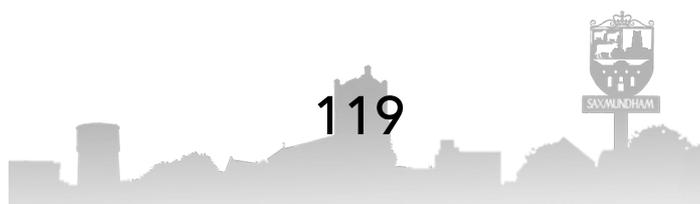
- 13.3 The Local Plan contains policy SCLP3.4: Proposals for Major Energy Infrastructure. The policy sets out the approach to be taken by East Suffolk to such applications either in its role as determining authority for development under the Town and Country Planning Act, or as consultee on Nationally Significant Infrastructure Projects. The policy indicates that the Council will take into consideration the nature, scale, extent and potential impact of proposals for Major Energy Infrastructure Projects, including cumulative impacts throughout their lifetime, including decommissioning of existing plant and facilities. Proposals for Major Energy Infrastructure Projects across the plan area and the need to mitigate the impacts arising from these will have regard to relevant Neighbourhood Plan policies, regarding environmental impacts such as landscape, wildlife, heritage, coastal erosion and floodrisk, highway safety, impacts of construction, economic benefits, decommissioning and restoration measures and the cumulative impacts.
- 13.4 There is a history of such developments in this area with the most notable being the Sizewell Nuclear Energy Site. Nuclear energy has been generated at Sizewell since the 1960's and the operation of the site will continue well beyond the plan period of the Local Plan and the Neighbourhood Plan as a result of the separate operations that take place such as the decommissioning of Sizewell A and B and the construction of Sizewell C.

Energy Projects either within or in the vicinity of the Neighbourhood Area

- 13.5 There are a number of NSIPs proposed in East Suffolk which vary in terms of their form and impact on the Neighbourhood Area.

Nuclear Power: Sizewell

- 13.6 Although the main construction site for the Sizewell C nuclear reactors lies outside of the Neighbourhood Area, the construction phase was triggered in January 2024 and construction has commenced with enabling works.
- 13.7 The principal impacts for Saxmundham generated by Sizewell relate to construction traffic. This is in the form of vehicular construction traffic using the A12 and rail borne freight traffic using the line between Ipswich and Saxmundham then on to Sizewell. The impacts are in the form of noise and disturbance from increased road traffic and heavier vehicles using the A12 and



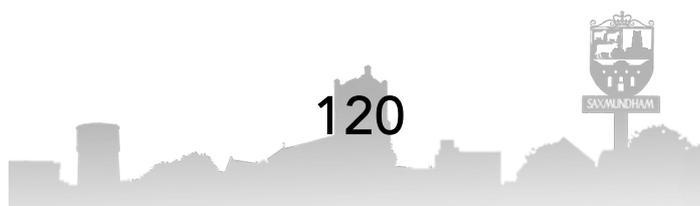
from the increase in nighttime rail movements which go directly through the town. Unfortunately, given that the Sizewell development has been consented the Neighbourhood Plan is not able to influence these matters through a Neighbourhood Plan policy. See also **Policy SAXGN4** on noise mitigation measures for Garden Neighbourhood.

Off shore Wind Energy: East Anglia One North (EA1North) and East Anglia Two (EA2)

- 13.8 Scottish Power Renewables plans to develop two offshore wind farm projects off the east coast. These projects are in addition to the existing East Anglia One and East Anglia Three Projects. Both EA1North and EA2 will make landfall under Thorpeness Cliffs and two trenched cable corridors up to 100m wide side by side are to be constructed between landfall and Friston village via Sizewell and Aldringham. These projects do not require any construction or new development within the Saxmundham Neighbourhood Area although the cumulative impacts of construction traffic for these projects together with the Sizewell construction are of concern.

Off-shore electricity interconnectors: Sea Link

- 13.9 This is a new proposed high voltage undersea electricity link between Suffolk and Kent being developed by National Grid Electricity Transmission (NGET). NGET has stated that the Sea Link project is required to add greater capacity to the electricity transmission network. The proposal includes onshore underground cabling, a substation at Friston and a converter station at Saxmundham. This proposed converter station is broadly in the same location as the converter station proposed for another project known as Lion Link but will be an additional structure. There does not appear to be proposals for co-location currently, i.e. it is understood that there would be two separate tall structures (one each for Sea Link and Lion Link) each with its large operational footprint.
- 13.10 The Sea Link proposal includes the Saxmundham converter station, and access including a bridge over the River Fromus. The River Fromus crossing would provide an access route to the converter station for construction vehicles and reduce construction traffic in Saxmundham. The bridge location has been amended in order to reduce the impact on trees to the east of the river but would mean it is closer to heritage assets south of Saxmundham e.g. Hurts Hall (Grade II Listed Building). The exact location of the compound has not yet been confirmed although it is likely to be close to the converter station. In



terms of mitigation Sea Link currently proposes a new area of agricultural land between Sternfield and Saxmundham, east of the River Fromus, to create small gaps in the crops so birds can access nesting habitats. An area of land near Aldeburgh, off the A1094 and within the National Landscape area, would also be included and is proposed to be managed 'acid grassland'. This is a type of open landscape and habitat that encourages biodiversity. It should be noted this area lies outside of the Neighbourhood Area for this Neighbourhood Plan.

Offshore electricity interconnectors: Lion Link

- 13.11 The Lion Link Multi-Purpose Interconnector is being developed by National Grid Ventures. The Lion Link project involves the creation of a High Voltage Direct Current transmission cable between the UK and Netherlands. The operational 'footprint' for both projects is likely to be in excess of 3 hectares. Access to the converter station is likely to be from the B1121 to the south of Saxmundham, crossing the River Fromus south of Hurts Hall. The proposed location of the converter station is directly on a public right of way (Saxmundham 3). This proposed converter station is broadly in the same location as the converter station proposed for another project known as Lion Link but will be an additional structure. There appears to be proposals for co-location; it is understood that there would be two separate tall structures (one each for Sea Link and Lion Link) each with its large operational footprint.
- 13.12 The key issues for Saxmundham parish include traffic, operational impacts and construction impacts. These include the cumulative impacts in association with Sizewell C and EA1North and EA2 off shore wind projects and the impacts of the proposed converter stations itself.

Cumulative Impacts

- 13.13 The impacts of Sea Link on Saxmundham will be in addition to the proposals for Lion Link (see 13.12) and the other energy projects shown above. Taken together, these proposed new converter station developments, in particular, unless well masked and mitigated, create a very large new industrial site and 'landscape' in a setting that historically has always been rural/agricultural in use and appearance.
- 13.14 The direct impacts on the town include the following:

Construction Impacts

- Noise



- Vibration
- Air pollution
- Dust
- Traffic congestion

Operational Impacts

- Landscape
- Heritage
- Townscape
- Biodiversity
- Public Rights of Way

Scope of the Neighbourhood Plan Policy

- 13.15 Consultations undertaken in respect of the various energy projects (and the response of the Town Council to them) indicate a level of concern from local residents about the scale and number of major energy projects proposed in and around the parish and their potential cumulative impacts on residential amenity and the natural and historic assets of the parish. These concerns not only relate to the major energy projects themselves but also to the associated onshore infrastructure required to connect them to the grid for example, cables, connectors, pylons, converter stations etc.
- 13.16 There is also arguably an increasing risk to the character of Saxmundham itself. Its existing reputation as a historic Suffolk market town and gateway to the east Suffolk coast with historic villages, national landscapes, heritage coast and important wildlife habitats is in danger of being superseded by that of a town under siege from large scale energy infrastructure, increased town centre congestion from traffic serving the various projects set in an industrialised landscape littered with energy infrastructure and related subsidiary buildings and structures.
- 13.17 Whilst some impacts may only be 'temporary'– i.e. digging up the required channels, laying cables and then covering over the excavations, these should also be taken into account and as long as the disturbed area is able to recover within a reasonable time, the emphasis must be on proper restoration. If the disturbance is longer-lasting or permanent, then policy of mitigating/compensating as close as possible to the affected areas is critical.



- 13.18 The Modified Neighbourhood Plan, therefore, seeks to ensure that the cumulative impacts of multiple energy schemes on the Neighbourhood Area are taken into account by the relevant determining body. The Plan also seeks to ensure that where such energy schemes are identified as being likely to have adverse impacts on the parish, including the cumulative impacts from multiple schemes and their associated infrastructure, that those mitigations are prioritised and suitably located within the Neighbourhood Area. Whilst accepting that the determination of NSIPs lies outside of the remit of the Neighbourhood Plan, the principles of the mitigation hierarchy as applied to applications affecting biodiversity, namely Avoid-Mitigate-Compensate should be employed when considering the location of those mitigations.
- 13.19 In the light of these factors, it is considered necessary to include a policy which deals with the identified impacts. This could be achieved through the inclusion of the Statutory Biodiversity Metric to be used to demonstrate that, not only will there be no loss of the ecological value of habitats, but that a net gain will be provided. The statutory minimum net gain is 10% for most development, with NSIPs not required to deliver net gain until at least 2025.



POLICY	<p>SAXEN1: Addressing and mitigating the impacts of large scale energy projects</p> <p>The impacts on the Neighbourhood Area of major energy infrastructure projects and associated developments (e.g. projects for nuclear energy, off shore wind, interconnectors, pylons, converter stations, cable trenches, pipelines etc), including the cumulative impacts from multiple schemes should be given significant weight in the determination of such schemes.</p> <p>Where adverse impacts from major energy schemes upon the Neighbourhood Area, or any part of it, are identified, e.g. on residential amenity, the landscape, historic environment, wildlife, ecology and nature recovery, appropriate measures of local mitigation (having effect within the Neighbourhood Area), and/or compensation, will be drawn up and recommended to the project promoter and/or other relevant authorities or bodies.</p> <p>These measures will take into account the policies set out in this Neighbourhood Plan, the relevant matters set out in the Local Plan and those set out in Local Impact Reports of other levels of Suffolk’s local authorities.</p> <p>Such measures to be proposed – whether in relation to the construction, operation or decommissioning phases - may in particular include those for the purpose of:</p> <ul style="list-style-type: none"> • Protecting nearby residential neighbourhoods, so far as practicable, during construction, operation and decommissioning, from noise, dust, vibration or other disturbance or deleterious effects. • Minimising and mitigating the adverse visual impacts of any relevant structures, e.g. converter stations, on the landscape, historic environment or urban settlement. • Mitigating any increase in flood risk or pollution in respect of the River Fromus, during construction, operation and decommissioning. • Minimising and mitigating the adverse impacts on the natural environment, during construction, operation and decommissioning to wildlife and local biodiversity, noting that the standard biodiversity net gain metric of at least a minimum of 10% should be applied.
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<ul style="list-style-type: none"> • Preventing or minimising adverse impacts on the town centre and residential areas from Nationally Significant Infrastructure Projects related traffic during construction, operation and decommissioning. <p>Where works take place which have temporary impacts and/or are for a temporary purpose, the emphasis should be placed on timely restoration, once works have been completed and/or the purpose of the works has been completed.</p> <p>In addition, where mitigation is not possible, or is likely to be inadequate in addressing the full adverse impact of the works in question on the locality or some part of it, appropriate and proportionate compensation should be made to those affected.</p>
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Specific mitigations for Saxmundham

13.20 Whilst not endorsing the energy infrastructure proposals in principle, the Town Council has sought to respond positively to the opportunities for securing mitigation and potential community benefits as a result of the detailed schemes, should it be determined that they go ahead. The presence of converter stations just outside the built settlement of Saxmundham will permanently alter the town and the nearby communities of Kelsale, Carlton, Benhall and Sternfield. It is recognised that there is no mitigation that can fully compensate for the ecological, physical and visual impacts on the natural and historic environment. The Town Council is working collectively with Councillors from Kelsale cum Carlton Parish Council and Benhall and Sternfield Parish Council, together with interested local residents.

13.21 The aim is to help develop a series of mitigatory proposals which can be supported by the energy project developers to increase community awareness of environmental issues and work in partnership with other organisations to protect, promote and enhance the environment within the town and wider community, to support local environmental projects.

13.22 A number of specific mitigations/interventions have been identified; however, not all of these are appropriate for the Neighbourhood Plan. However there are a number which have a land use implication and may be appropriate for the Neighbourhood Plan and these are set out below.

a. Mitigating the visual and biodiversity impacts of the converter station(s)

13.21 The area which includes the sites of the converter stations, the new access road and the bridge will suffer the most significant direct impacts on habitat due to:

- altered soil composition.
- increased stormwater run-off with vast areas of previously permeable landscape becoming covered with impermeable surfaces.
- destruction of irreplaceable established woodland and hedgerows and wildflower margins.

13.22 The converter stations will permanently alter the visual aesthetic of the area and take arable land out of production. There will be no direct benefits to the surrounding communities from the construction or running of this energy infrastructure project. The converter stations are expected to reach 26m in height and will be highly visible in the landscape from all directions. In order to mitigate their visual appearance, built footprint and scale in the landscape proposals for the converter station should be consistent with the following criteria:

- Consideration should be given to wholly or partially burying or lowering the converter station buildings to reduce their overall visible height and assist with their assimilation into the wider landscape.
- The exterior materials and colour should be chosen with landscape visibility in mind to reduce their overall effect.
- Opportunities to clad the external elevations of the buildings with 'vertical habitat cladding' should be considered. The most important elevations are those from the South Entrance to Saxmundham which is identified as an important public view in the made Neighbourhood Plan. This would provide new habitat for swifts, bats and pollinating insects.
- Where new roads or access routes are to be created to serve the converter stations. These should be constructed to adoptable standards suitable for future public use as a long-term relief road for the town - linking the B1121 (South Entrance) and the B1119 Leiston Road. This will ensure that if retained, post construction, they will help to reduce traffic congestion in the town centre.
- Hedgerows should be required to be planted both within the development site and adjacent, including along the affected section of the B1119 Saxmundham to Leiston Road, for environmental and landscaping purposes; in addition, also for these purposes, trees including copses should be planted within the development site as far as practicable, and/or in the immediate vicinity, to provide a legacy

that echoes the heritage of the Great Wood that formerly stood on or close to the main converter station site.

b. Mitigating any increase in floodrisk or pollution to the River Fromus

13.23 Development will be expected to manage all surface water runoff from impermeable surfaces through water harvesting solutions, attenuation ponds, swales and tree pits, raingardens and retention basins as appropriate. Where new roads (even temporary roads) are to be constructed these should establish swales and bioretention basins along all new roads to capture and treat water runoff to reduce flood risk and mitigate risk of pollution to the Rover Fromus.

c. Mitigating the adverse impacts on biodiversity

13.24 The compulsory purchase of the farmland for cable trenches provides an opportunity to repurpose the land for the amenity of the local community and create a Green Nature Corridor, potentially linked with the SANG which is to be delivered as part of the South Saxmundham Garden Neighbourhood. The route of the cable trenches would allow for a completely hedgerowed and wild flower margined, accessible, safe, non-vehicular route. This access to nature would provide health and wellbeing benefits to the local communities. This Green Nature Corridor would be cycle/bridleway/mobility/disabled inclusive, offer tourism opportunities and provide connectivity for flagship Suffolk species to the Suffolk Coast and Heaths National Landscape. There are opportunities to create cycle connections with the railway station to provide sustainable wildlife friendly travel.

13.25 Opportunities also exist for the creation of a wildlife overpass as a Living Green Bridge over the River Fromus. This bridge is required to access and construct the converter stations. Following the completion of construction, the bridge will transition from construction route to rewilded overpass and therefore the initial bridge designs should reflect the later purpose. Whilst remaining an option for future access for maintenance, its main role will be to support wildlife. As with other bridges in the local area, the bridge will be built with an otter ledge to support their safe passage under the bridge.





14. Opportunity Zones: Saxmundham town centre

- 14.1 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.
- 14.2 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.
- 14.3 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.
- 14.4 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.

14.5 The Town Council engaged consultants AECOM in early 2021, to produce a concept Master Plan for the High Street and present some potential options and opportunities for addressing these issues that the Town Council could then take forward.

14.6 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.

14.7 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.



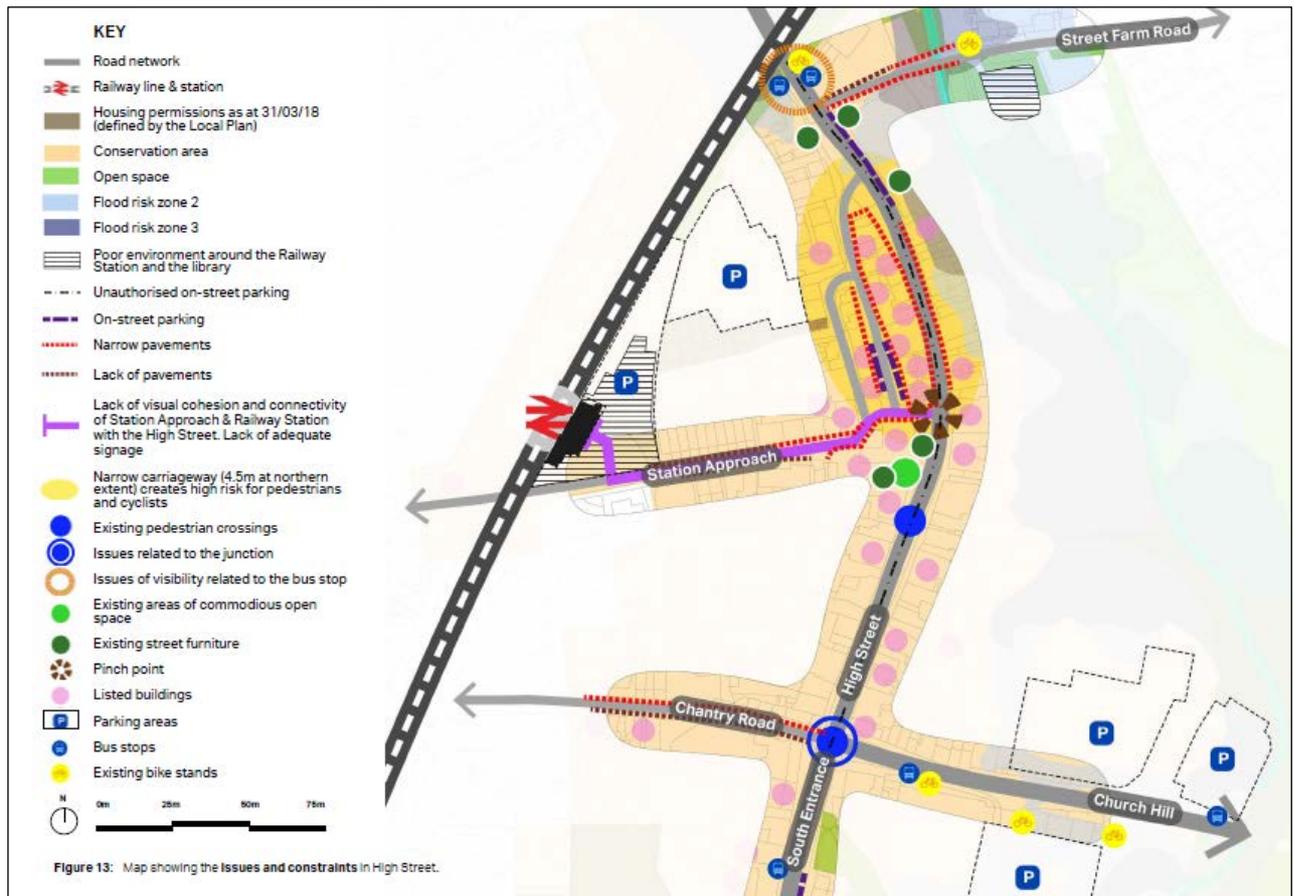


Figure 36: Issues and constraints around the High Street, Saxmundham (source: Concept masterplan for the High Street, AECOM).

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 F**.

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

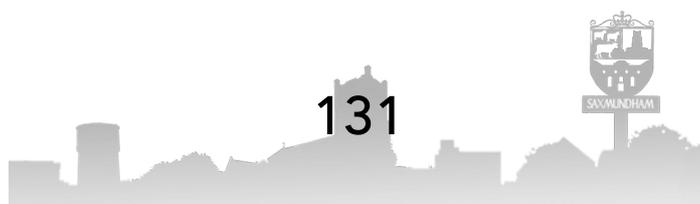
- a. Reinforce the area's distinctiveness and attractive character as a location where pedestrian activity is prioritised and users have a high sense of safety and belonging.
- b. Ensure the impact of vehicular traffic is relatively low and frontage servicing is minimised.
- c. Support good connectivity 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 parking within easy walking distance of 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.

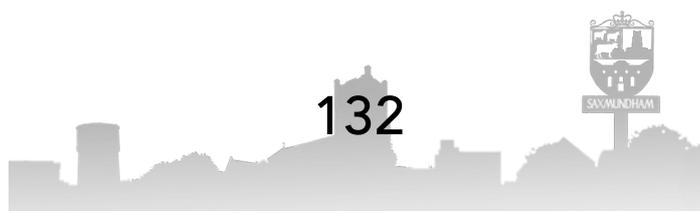
See also **Policy SAX10: Historic Town Centre and Conservation Area**.



Station area Opportunity Zone

Objective STC4: To encourage the economic and environmental regeneration of the station area Opportunity Zone via a masterplan led approach, which encourages mixed-use development of underused and derelict land, and improves the attractiveness of Station Approach as a route for pedestrians and cyclists.

- 14.8 Saxmundham Railway Station sits to the west of the High Street and is linked to it by Station Approach. This area creates the impression of being slightly disconnected from the town centre and has historically suffered from poor public realm, although some significant environmental improvements have recently taken place in the immediate Station environs which address the latter issue.
- 14.9 The Railway Station will be treated as another type of gateway into the town centre offering a pleasant and welcoming environment with appropriate signage to navigate people around. The station area has significant potential to improve car parking within the town. The Station parking and the District Council's car parking area to the north could be connected or merged to increase public parking capacity in the town centre and also free up the outdoor space in front of the Railway Station building. The level difference between the two car parking areas will need to be taken into account in the design.
- 14.10 The area also provides the opportunity for a public square at the Railway Station with seating areas, shops and information centre and could form part of a wider development opportunity.
- 14.11 There are also opportunities in this zone to promote the regeneration of areas of brownfield, and underused land. An area of land around the station bordered by St John's Road to the north, which includes land either side of the Railway line, the station area itself, the unpaved private car park and the current Saxmundham Town Council offices to the south off Station Approach has been identified in **Policy SAXSA1** below as an 'Opportunity Zone' which has the potential for a mixed development opportunity for a broad range of uses including, housing, commercial, community and retail uses, together with environmental and public realm improvements. Detailed proposals would need to come forward through a holistic masterplan process (for the whole or substantial part of the area) involving existing landowners and economic



operators, and with community engagement. The area is partly within, and otherwise abuts, the Conservation Area, and appropriate design will be fundamental to any proposals in this area.

POLICY

SAXSA1: Station area Opportunity Zone

Development proposals in and around the station area (**figure 37**) should as appropriate, seek:

- i. To improve the overall setting of the station.
- ii. To enable people to easily transfer between sustainable modes of travel (walking, cycling, bus, rail and taxi).
- iii. To improve bus and coach access to the station area with the longer-term aim to divert heavy traffic away from the narrow streets around the station.
- iv. To create public access from St John's Road to the Station.
- v. To contribute to the economic vitality and viability of the town.

Proposals that would result in visual and environmental improvements in this Opportunity Zone will be supported together with proposals that would increase connectivity with the town centre and the other areas of the town.

Support is given for proposals that would, as appropriate:

- a. Include public realm improvements, including improvements to the carriageway and the incorporation of traffic calming measures that would enable the creation of a more comfortable and welcoming space.
- b. Provide improved connectivity to the town centre (see also **SAXTC1c**).
- c. Provide for an outdoor meeting space/sitting space/public square adjacent to the railway station.
- d. Improve provision for cyclists, for example, by providing, safe, attractive and convenient links to the station, with secure and conveniently located cycle parking.
- e. Include new mixed uses (including commercial/office/workshops) and an information point adjacent to the railway station.
- f. Improve access to the station area for buses and coaches.
- g. Include visual improvements to the area in the form of increased provision of street trees, use of soft landscaping and rationalised signage.
- h. Improve directional signage to link the railway station and the town centre for pedestrians.



Mixed-use development opportunity
 The Station Area Opportunity Zone, (figure 38) will be enhanced as a gateway to the town and promoted as a key development opportunity for mixed uses including housing, commercial and community uses. Subject to Master Planning, proposals for the development and enhancement for part or the whole of the area will be welcomed.

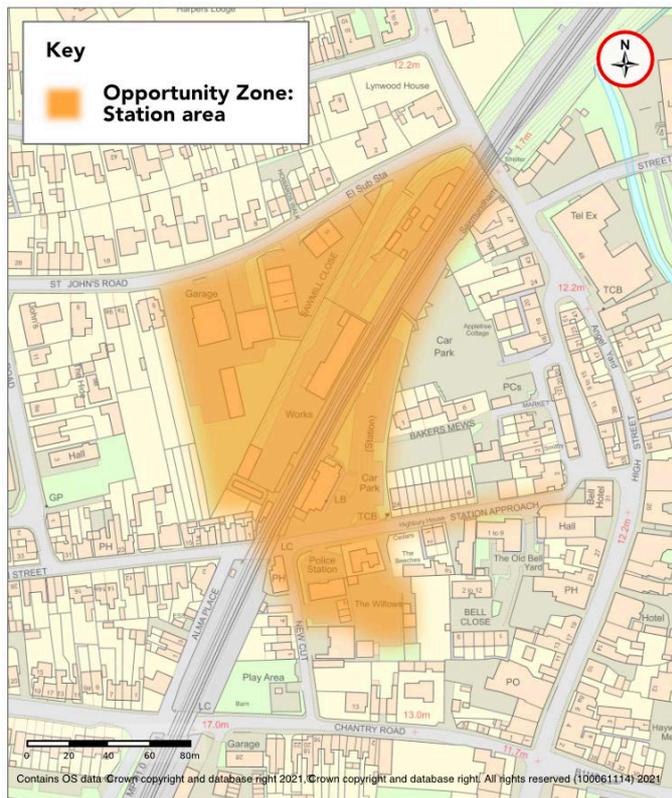


Figure 37: Station area Opportunity Zone (source: Parish Online with own annotations).

Street Farm Road Opportunity Zone

- 14.12 Street Farm Road lies to the north-east of the town centre and east of the railway line. The junction of Street Farm Road with the High Street is dominated by the former Royal Mail/BT building which sits on the south of the junction and fronts onto the High Street. On the north side of the junction is the Saxmundham Hand Car Wash which uses a range of buildings that were formerly part of the Bus Garage and a yard accessed from the High Street.
- 14.13 Street Farm Road is a narrow road of uncertain land ownership which runs east from the High Street along the side of the Royal Mail building. To the rear of the car wash is the library, forming part of the buildings owned and operated by Suffolk County Council, and immediately opposite, between the Royal Mail

building and the Fromus Veterinary Group, is an area of undeveloped land owned by BT Openreach which is largely used as a temporary materials store and for informal car parking. These areas are identified as an Opportunity Zone with some potential for development particularly if that would bring about visual enhancements to the area. Both areas have some potential for flooding and therefore any proposals would need to take account of this.

14.14 The zone's location at the north end of the town centre and its visual prominence at the junction of the High Street, indicate that it could be suitable for a development comprising public car parking at the front and commercial and employment uses to the rear. It also offers scope for environmental and visual improvements.

14.15 The area opposite the library that is currently used as a materials store has significant potential to provide an overall visual and environmental enhancement to the area due to its proximity to the riverside walk and offering potential as open space and recreational benefits associated with the riverside. The area could easily provide a flexible communal space for events and picnics together with significant environmental benefits in the form of a visual enhancement to the area through public realm improvements, structural planting and landscaping.

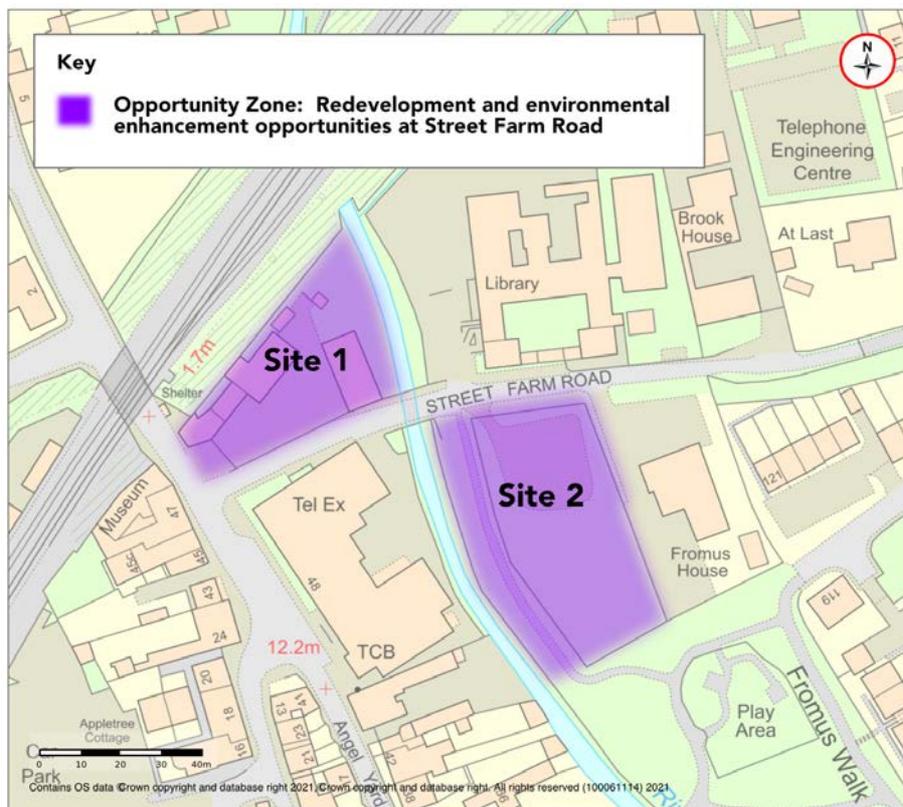


Figure 38: Development and environmental enhancement opportunities at Street Farm Road Opportunity Zone (source: Parish Online with own annotations).

POLICY	<p>SAXSFR1: Street Farm Road Opportunity Zone</p> <p>Two areas are identified in Street Farm Road as having the potential to provide for development and environmental enhancement which would improve the visual appearance and character of the area (figure 38):</p> <ul style="list-style-type: none"> • Site 1: the site of the former Bus Garage, currently used as a hand car wash, is identified for development consisting predominantly of the provision of public car parking (including provision for electrical car charging) to serve the town centre at the front of the site, with commercial and employment uses to the rear. • Site 2: the site opposite the library and currently used as a material store and informal car parking, is identified as a flexible community open space with links to the riverside walk providing environmental and visual enhancements.
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Fromus Square Opportunity Zone

14.16 Fromus Square is set well back and east of the High Street, adjacent to the Waitrose supermarket on Church Street. It provides a pedestrian ‘cut through’ from the Waitrose car park fronting Church Street, along the side of the supermarket building and onto the High Street. The area is not visually prominent and as it does not have a street frontage is potentially considerably underused. It is not sign-posted from either direction nor does the visual appearance of its direct access onto the High Street encourage pedestrians to use it. The area has archaeological potential, and there is high potential for the discovery of below ground heritage assets within the site. Proposals for development here may need to secure a programme of archaeological investigation and reporting. In addition the area lies within an area of flood risk which will also need to be taken into account.

14.17 However it does provide a potentially attractive, area for retail or hospitality together with a safe and useable community space with a pedestrian priority. It has recently attracted important new retail and hospitality businesses. The area is identified as an Opportunity Zone which could accommodate a range of events including market stalls and seasonal events but could also be suitable for outdoor seating and dining for uses such as cafes, bars restaurants or galleries. The area would benefit from public realm improvements such as

planting and paving, together with better signage and connections to enhance its presence and encourage users to find it.

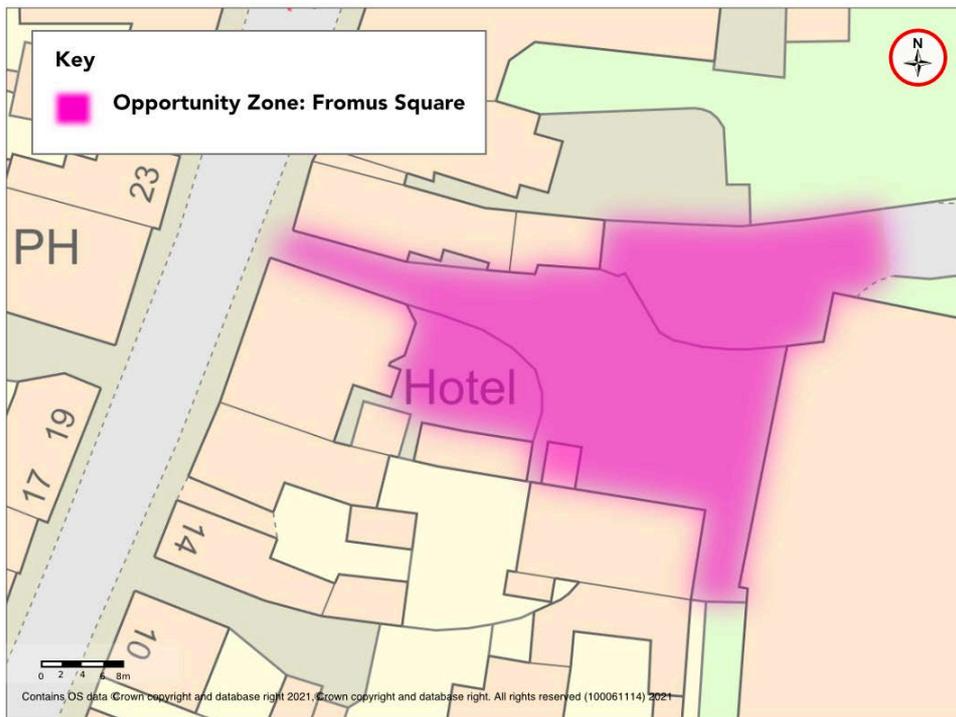


Figure 39: Fromus Square Opportunity Zone (source: Parish Online with own annotations).

POLICY

SAXFS1: Fromus Square Opportunity Zone

Proposals that would provide environmental and visual enhancements (including hard and soft landscaping improvements) to the overall character of Fromus Square (**figure 39**) will be supported.

Proposals which would enhance the retail, hospitality and leisure use of the area, whilst preserving its character, including those for provision of retail, restaurant, café/bar use, and/or facilitate its use for market purposes and enhance its overall visual quality will be supported.

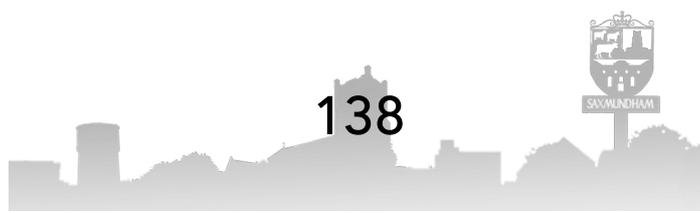
Proposals to improve access to the square from Waitrose and its car park, to and from the town centre, and to and from the residential areas north of Church Hill, will be supported in principle.



15. Opportunity Zone: Former Fromus Centre and Community Garden

Objective FFC1: To support good quality development of the area for specialist and other housing purposes and for community use, in particular safeguarding the community garden, and offering improved pedestrian access to and permeability within the site.

- 15.1 The former Fromus Centre Site is located east of Seaman Avenue and to the rear of the Ambulance Station, which itself is located opposite the Fire Station. The centre currently consists of a community building set in an area of open space. It was originally a residential centre for people with special needs, run by Suffolk County Council, which still owns the site. The site includes a Community Garden, which has been created (from a former overgrown kitchen garden site) by local residents to grow food locally and for community benefit purposes.
- 15.2 Vehicular access to the site is from Seaman Avenue via a loop road next to the Ambulance Station, although it is bordered to the east by residential development on Park Avenue there is no vehicular access from this direction.
- 15.3 There is a public path immediately to the north of the site which runs east from Seaman Avenue across the top of the site and comes out on to Mill Road. It is a narrow footpath, relatively well used but not well waymarked. There is also a



second footpath of mainly poor quality at present on the eastern edge of the site and running north-south, also adjoining the former secondary school playing fields and into the area that is due to be the Garden Neighbourhood.

- 15.4 It is understood that the County Council is considering options for the re-development of the site mainly for housing purposes including specialist housing to accommodate people with a specific identified need, as well as private housing for sale. The County Council has in principle agreed to preserve the Community Garden with some vehicular access in its present location.
- 15.5 The area is identified as a potential Opportunity Zone where development of the site provides the opportunity to provide environmental benefits in addition to those social benefits that would accrue, in particular, from the development of specialist housing. Such benefits would include retaining the existing community garden (**See Policy SAX15**), offer greater public access and permeability through the site. Opportunities for greater connectivity between areas of the town could also be created through the improvement of the adjacent footpaths and their potential enhancement into a shared use cycleway, encouraging greater connectivity.
- 15.6 The zone has been identified as having archaeological potential and therefore any proposals will need to take this into account.

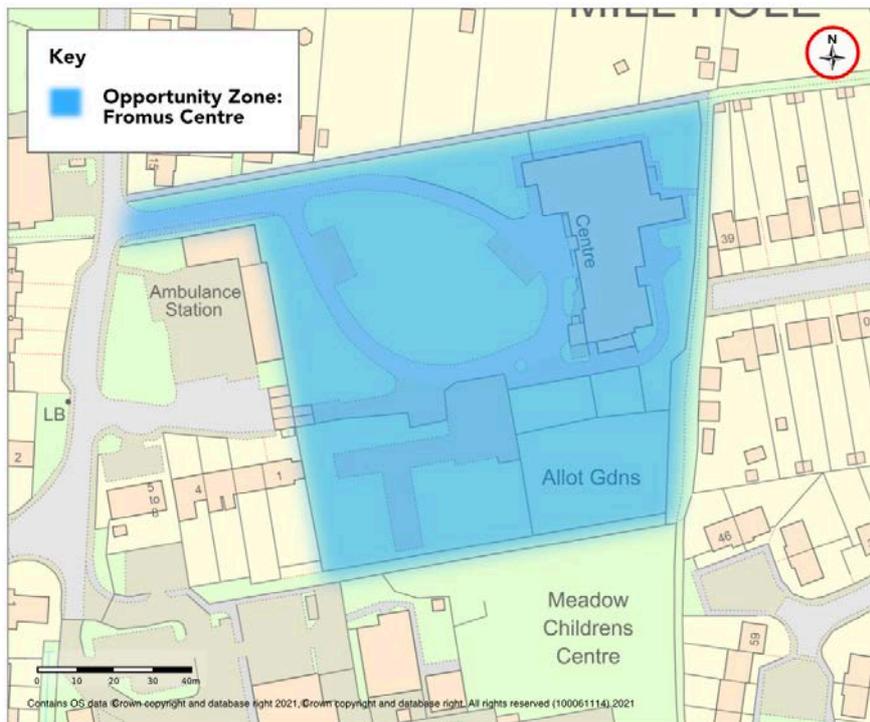


Figure 40: Former Fromus Centre Opportunity Zone (source: Parish Online with own annotations).

POLICY

SAXFC1: Former Fromus Centre site and Community Garden Opportunity Zone

Proposals that would provide an area of housing and open space that includes provision for a significant element of specialist housing including for those with identified special needs will be supported on this site (**figure 40**).

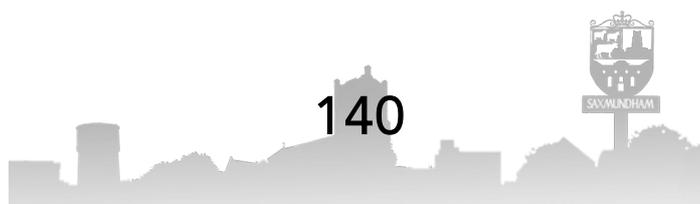
Proposals should retain the existing Community Garden as an undeveloped open space.

Layout and design should provide for appropriate levels of public access and increased permeability by pedestrians and cyclists through the site.

Proposals should provide for improved foot and cycle links between the zone, the town and the Garden Neighbourhood.

In particular, support is given for:

- i. Improved pedestrian links, including public footpath improvements at the north and east of the zone.
- ii. Provision for cyclists at the southeast corner of the zone as far north as Park Avenue, with improvements to the current north-south public footpath.





St JOHN'S
WELCOMES
YOU

16. Actions/statements of intent by Saxmundham Town Council

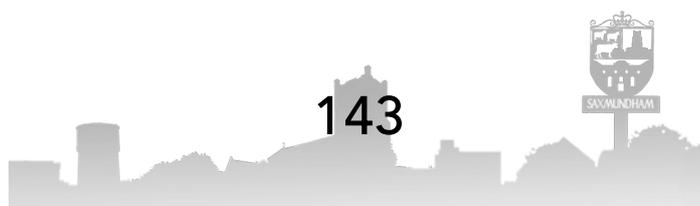
- 16.1 These statements of intent are included in the Neighbourhood Plan to show the Town Council's commitment to taking action within its powers and resources, or bringing its influence to bear, on matters which are outside the planning system, but which are nevertheless vital to the achievement of the overall vision. They will be carried out over the lifetime of the plan.
- 16.2 For Saxmundham to be a **thriving and prosperous town** it needs a healthy business community, adequate public parking to support the local economy, and easy and reliable access for those without private transport. To this end the Town Council will:
- i. Promote and support a business network for the town in consultation with local businesses and East Suffolk Council's economic development team.
 - ii. Promote a varied programme of events and activities in the town centre for all ages, to encourage its use and enjoyment by residents and visitors.
 - iii. Work with the District and County Councils to investigate a) improved short term parking in the town b) the provision of parking bays for quick pull in and deliveries and c) consideration of the introduction of residents' parking permits, where there is support from residents.
 - iv. Encourage East Suffolk Council and Greater Anglia to explore ways of linking their car parks to improve accessibility for commuters.
 - v. Encouragement and support will be given to improved bus services, and the possibility of a new intra town service will be investigated.
- 16.3 **A safe and healthy** Saxmundham requires adequate social, community and leisure provision to meet the needs of the residents. The Town Council will:
- i. Undertake consultation with the community on whether/what types of further indoor sports provision is required, what form(s) it should take, and where it might be provided. Work in partnership with public and private sector bodies to identify funding (including CIL) to support the delivery of the preferred option.
 - ii. Lobby for and support initiatives for new or expanded medical facilities.



- iii. Support the establishment of land to the east of the railway as a public open space/country park/SANG (Suitable Alternative Natural Green Space) as included in the Local Plan, for use by the whole community, and (through the natural greening of the whole site) work towards increasing its biodiversity.
- iv. Develop an overall green infrastructure plan for the town and the rural parts of the parish. To be progressively implemented with support from local interest groups, landowners and East Suffolk Council.
- v. Create a comprehensive circular walk around the town.
- vi. Investigate initiatives to improve facilities for cyclists, including, but not limited to:
 - a) a review of the three communities cycle route and its possible expansion to include additional routes through and around the South Saxmundham Garden Neighbourhood.
 - b) the provision of a safe cycle link from Benhall to Saxmundham and on to Kelsale, using existing rights of way and/or inside the existing hedgerow along the B1121.
 - c) ensure that enough and safe cycle parking and storage facilities are available within the town.
- vii. Lobby for and, within resources, work to implement footpath widening and other relevant measures to improve pedestrian safety along Rendham Road.
- viii. Continue to support voluntary and other organisations which provide community and social facilities within the town, in particular for young people and children, and for those sections of the community who are vulnerable or isolated or have special needs. Where possible, the Town Council will seek to promote more effective coordination of such services for the parish.
- ix. Work to secure or enhance for the community of Saxmundham a full range of public and community facilities and services to meet the growing population of the town and its environment.

16.4 To maintain Saxmundham's **distinctive character and attractive environment**, and further enhance it, the Town Council will:

- i. Support and promote proposals for traffic calming and environmental improvements in the town centre including the station area, in order to
 - a) reduce traffic speeds in the town centre,
 - b) reduce the number of HGVs using the town centre (except for deliveries and loading)
 - c) remove illegal parking particularly pavement parking,
 - d) improve the safety and environment for pedestrians, cyclists and those with reduced mobility.



- ii. Support the renovation of 32 High Street commercial property and archway and creation of an attractive approach to the riverside in the town centre.
- iii. Support improvement to and greening of the pathway connecting Fromus Square to the Fromus bridge and to the housing estate.
- iv. Work for the upgrading of the Market Hall's frontage, seeking grant funding.
- v. Implemented plans for the redesign and environmental upgrade of the Memorial Field.

16.5 Note: the above statements of intent are not intended to be comprehensive; the Town Council will seek to take the above and other steps as practicable and as prioritised, to support the full realisation of the Neighbourhood Plan's vision, objectives and policies, within its resources and competences.





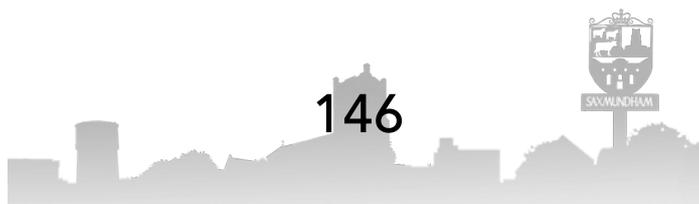
17. Implementation and monitoring

Implementation

- 17.1 The planning policies contained in the Plan will be implemented by the East Suffolk Council. The Town Council's role is to bring its influence to bear on matters which lie outside the control of the planning system, but which are of vital importance to the life of the town and the achievement of the vision. The Town Council will support and encourage proposals which further the aims of the Plan, it will promote and encourage and facilitate co-operative working and partnership between public and private interests and lobby for change where this furthers the vision for the town.
- 17.2 Through the development of the Neighbourhood Plan a number of actions/projects have been identified which lie outside the remit of the Neighbourhood Plan policies but nevertheless are important issues to local residents and therefore require attention. These are outlined below.

Monitoring

- 17.3 It is good practice for Neighbourhood Plans to undergo a formal review process in consultation with the local community and the relevant District Council at a minimum of every five years, to ensure that the Neighbourhood Plan is still current and remains a positive planning tool to deliver sustainable growth. In order to determine when a review is necessary, the Town Council will monitor development in the parish along with local and national planning policy and in the appropriate legislative context.
- 17.4 It is anticipated the Neighbourhood Plan will require further review during its life and that it will be the role of the Town Council to update the Neighbourhood Plan at the appropriate time. It is possible that further development will take place during the Neighbourhood Plan period (2020 – 2036).
- 17.5 Any review will provide an opportunity to reassess the town's housing and economic markets and to resolve some of the bigger issues surrounding



development in and around the town including the Garden Neighbourhood, Energy Infrastructure Projects and the town centre.





Appendix

Appendix A: Neighbourhood Plan Steering Group members

- **Geraldine Barker**, Town Councillor
- **Christine Buttery (vice-chair)**, local resident
- **Diana Eastman**, local resident
- **John Findlay (vice-chair)**, Town Councillor
- **Nick Jackson** (until August 2025)
- **Stephen Palmer**, local resident
- **Justin Power**, local resident
- **Jeremy Smith (chair)**, Town Councillor
- **John White**, local resident

Observer

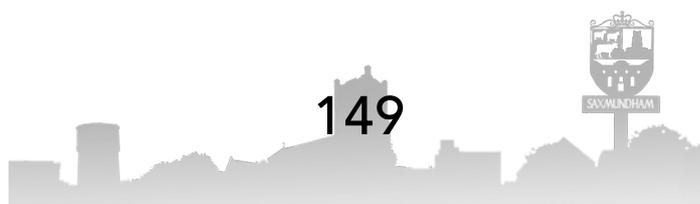
- **John Fisher**, District and Town Councillor

Supported by

- **Sharon Smith**, Town Clerk

Independent Consultants

- **Andrea Long**, Compasspoint Planning
- **Rachel Leggett**, Rachel Leggett & associates
- **Emma Harrison**, Rachel Leggett & associates



Appendix B: Justification for Non-designated Heritage Assets

The table below outlined the justification for the inclusion of important character buildings and historic features. The criteria is based on the 'Local Heritage Listing: Historic England Advice Note 7', page 9.

1. The United Reformed Church, Chapel Road and its graveyard	
Age	Founded in 1844, this building erected in 1850.
Rarity	NA.
Aesthetic interest	Local landmark.
Group value	NA.
Archaeological interest	Graveyard is on the Suffolk Monuments Record (SXM 025).
Historic interest	Originally a Congregational church, now United Reformed Church.
Landmark status	Imposing and prominent. Visible from outside the town.



Figure 41: The United Reformed Church , Chapel Road.

2. The Old Fire Station, Rendham Road	
Age	1915 with later additions up to WWII. Closed in 1995.
Rarity	Fairly rare survivor.
Aesthetic interest	NA.
Group value	Close to the United Reformed Church
Archaeological interest	None identified.
Historic interest	Town history.
Landmark status	Town history and WWII associations.



Figure 42: The Old Fire Station, Rendham Road.

3. Toll Gate Cottage, North Entrance

Age	1785.
Rarity	Rare, surviving Toll Gate on the former London to Gt Yarmouth turnpike.
Aesthetic interest	Striking reddish exterior and wooden cladding construction; altered.
Group value	May have originally been part of a group.
Archaeological interest	None known.
Historic interest	A toll house operated by the Ipswich to South Town Turnpike Trust from 1785.
Landmark status	Marks the entrance to the town from the north.



Figure 43: Toll Gate Cottage, North Entrance.

4. The Layers	
Age	The Layers is so called because farmers would bring their livestock (cattle, sheep, pigs, chickens etc) to Saxmundham Livestock Market (which was situated on the current Waitrose site). Prior to going to the market, the livestock would be “laid up” on The Layers in an assortment of pens and enclosures.
Rarity	Potentially the largest area of unrecorded archaeological interest in the parish.
Aesthetic interest	Provides important undeveloped southern entrance to the town and makes significant contribution to its rural setting.
Group value	NA.
Archaeological interest	Archaeological finds across the site. According to the Historic Environment Record held by Suffolk County Council , Geophysical survey in The Layers provided evidence for significant archaeological activity in the east of the site. Anomalies relating to a trackway and adjoining settlement are present. There is evidence for enclosure ditches and possible sub-enclosures and there are discrete responses present that could be related to the remains of the structures or areas of burning or industrial activities. There is a change in the background magnetic responses in the east of the area that is suggestive of a change to, or an increase in the amount of alluvial deposits, presumably associated with the adjacent watercourse.
Historic interest	The area of land where stockmen would ‘lay-up’ their stock prior to the biweekly livestock sale. From 1831 – 1939 , Saxmundham also hosted the annual Suffolk Show a total of 14 times. Used as a camping ground by the 6 th Suffolk cyclists during the Great War. On the southern edge of the layers at Kiln Lane, Bigsby’s Corner, there still stands the former “Pest House”, originally known as “The Small-Pox House”. This is where inhabitants of Saxmundham were put in quarantine if they were suffering from infectious diseases. This was also used during WW1 for housing for Italian POWs.

	<p>During the First World War, The Layers was used for temporary military accommodation by the army.</p> <p>In WWII, The Layers became an important landmark of national and international history when plans were put in place for the D Day Landings and the need to deliver armoured vehicles that could clear mines and other coastal defences</p> <p>Winston Churchill personally selected Major General Percy Hobart to head up the 79th Armoured Division. Hobart chose to base the 79th Armoured Division at Hurts Hall. The peculiar looking vehicles became known as “Hobarts Funnies”. They were first tested on The Layers before being trialled at Fritton Lake, Orford and Shingle Street. It was because of this that Churchill, Montgomery and General Eisenhower (supreme allied commander of Allied Forces in Europe) all visited Saxmundham in January 1944. They came to inspect “Hobart’s Funnies” and to plan for the Normandy Landings.</p>
Landmark status	<p>Historical associations from medieval times to WWII and acts as an important undeveloped entrance to the town and provides the setting of the south entrance.</p>
<div style="display: flex; align-items: center;">  <div style="margin-left: 20px;"> <p>Figure 44: The Layers.</p> </div> </div>	

5. Milestone/post on the B1121	
Age	18th or 19th century.
Rarity	Fairly rare.
Aesthetic interest	Simple milestone. Alternative spelling of town’s name – Saxmundum. London 89. Woodbridge 12, Ipswich 20, Lowestoft 24.
Group value	NA.
Archaeological interest	At one time had a cast iron face made by Garretts of Ipswich, now lost. The stone may pre-date this.

Historic interest	On the Ipswich and South Town turnpike an historic coaching route from London to Lowestoft.
Landmark status	Associations with the historic route from London to Lowestoft.
	
<p>Figure 45: Milestone/post on B1121.</p>	

6. The Pill Box on the Memorial Field	
Age	WWII.
Rarity	Noted as a last survivor.
Aesthetic interest	Hexagonal pillbox.
Group value	NA.
Archaeological interest	On Suffolk Monuments Record (SXM 027), 'pillbox at Saxmundham, the last survivor from the nodal point defences' (A guide to Second World War Archaeology in Suffolk – Guide 4, Stope Lines. Robert Liddiard and David Sims).
Historic interest	WWII interest.
Landmark status	Formed part of the coastal defences in WWII.





Figure 46: The Pill Box on the Memorial Field.

7. The War Memorial in Fromus Square

Age	2004.
Rarity	Not rare.
Aesthetic interest	Cornish granite.
Group value	NA.
Archaeological interest	NA.
Historic interest	WWI and WWII interest.
Landmark status	Focus of Remembrance Day Ceremony.



Figure 47: The War Memorial in Fromus Square.

8. The Town Pump	
Age	1838 cast by Garretts of Leiston.
Rarity	Only recorded pump.
Aesthetic interest	NA.
Group value	None.
Archaeological interest	NA.
Historic interest	Given to the town by William Long of Hurts Hall.
Landmark status	Was the source of water for the town prior to the arrival of piped water.



Figure 48: The Town Pump.

9. The Gannon Institute, but generally known as The Gannon Rooms	
Age	<i>Circa 1900.</i>
Rarity	Constructed specifically as a one off to benefit the town.
Aesthetic interest	Significant details on end gables and over windows.
Group value	None.
Archaeological interest	NA.
Historic interest	WWI interest, was used as a VAD hospital.
Landmark status	A charitable Trust founded for the benefit of the residents of Saxmundham.



Figure 49: The Gannon Institute, but generally known as The Gannon Rooms.

10. The Water Tower, Rendham Road

Age	1952.
Rarity	One of the tallest water towers in East Anglia, standing at over 200ft.
Aesthetic interest	Constructed in concrete, but unique in design as all water towers are. No two are exactly the same.
Group value	NA.
Archaeological interest	An important part of Britain’s engineering heritage.
Historic interest	Replaced the water pump as a means of storing water for the town and guarantees water pressure when demand increases at peak times.
Landmark status	Situated at the highest point in the Town. Visible from miles around, whether approaching Saxmundham from any direction by foot, bicycle, car or train.



Figure 50: The Water Tower, Rendham Road.

11. The Telephone Exchange, High Street	
Age	1950s.
Rarity	An iconic example of 1950's industrial architecture.
Aesthetic interest	Designed by Thomas Winterburn, one of the ten architects associated with the Festival of Britain movement.
Historic interest	Functioned as a busy working post office and telephone exchange until the 1970's.



Figure 51: The Telephone Exchange, High Street.

12. Victorian Post Box at the Station	
Age	c1856
Rarity	Rare, has an unusual internal flap to keep the post dry, unfortunately damaged in recent refurbishment.
Aesthetic interest	Embossed with VR and Crown
Group Value	One of a small number of prominent letterboxes in the town in key locations.
Archaeological Interest	NA.
Historical interest	Manufactured by Smith and Hawkes Broad Street, Birmingham
Landmark status	Integral part of the original station building

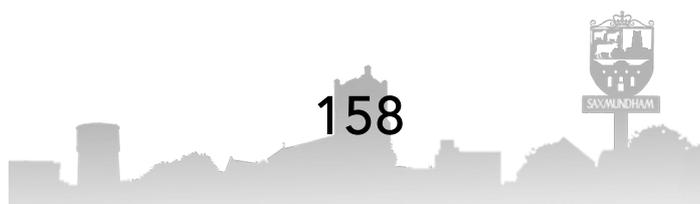




Figure 52: Victorian Post Box at the Station.

13. Saxmundham Goods Shed

Age	<i>Circa 1859.</i>
Rarity	Common at the peak of the railway era, however, has rarity value as many have been lost.
Aesthetic interest	Typical or railway architecture at that time.
Group Value	Part of the station complex, a key group of buildings in the town centre.
Archaeological Interest	NA.
Historical interest	Part of the station complex, a key group of buildings in the town centre.
Landmark status	Identified in the Conservation Appraisal as an unlisted building which makes a positive contribution to the Conservation Area.



Figure 53: Saxmundham Goods Shed.

14. Victorian Post Box at South Entrance	
Age	Late 19 th Century
Rarity	Common at their peak of Victoria's reign however, rarity value increasing over time
Aesthetic interest	Embossed with VR and crown
Group Value	One of a small number of prominent letterboxes in the town in key locations.
Archaeological Interest	NA.
Historical interest	Manufactured by W.T. Allen and Co London.
Landmark status	Prominent location in a wall at the south entrance

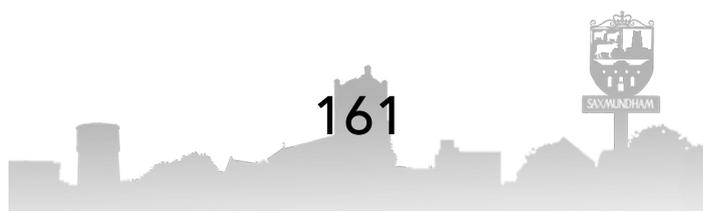


Figure 54: Victorian Post-box at South entrance

15. George V post-box North Entrance	
Age	1932
Rarity	Common at the peak of George V's reign.
Aesthetic interest	Embossed with crown and GR
Group Value	Built into a significant old wall. The wall is identified in the Conservation Appraisal as being of importance.
Archaeological Interest	NA.
Historical interest	Manufactured by W.T. Allen and Co London
Landmark status	Prominent location in a wall identified as having heritage value.



Figure 55: George V post-box at north entrance.



Appendix C: Justification for Local Green Spaces

The table below outlines the justification for the inclusion of each Local Green Space identified. The criteria are based on criteria set out in the National Planning Policy Framework.

1. The Memorial Field	
Description: The Memorial Field is owned by Saxmundham Town Council and was established after the First World War as a memorial to those who lost their lives.	
In reasonably close proximity to the community it serves	The Memorial Field is within a residential area of the town on the Rendham Road
Demonstrably special to a local community and holds a particular local significance	The Memorial Field is a well-used recreation ground with a skate park and scout hut. It is used for fun fairs and other one-off community events.
Local in character and is not an extensive tract of land	It is in character with a town recreational space and is not an extensive tract of land
	
Figure 56: The Memorial Field.	

2. Carlton Park	
Description: Carlton Park is a sportsground owned and run by Saxmundham Sports and Recreational Club.	
In reasonably close proximity to the community it serves	Carlton Park is adjacent to the northern boundary of the built-up area of the town. It is only partly within the parish of Saxmundham.

<p>Demonstrably special to a local community and holds a particular local significance</p>	<p>Carlton Park is an essential feature of town life providing sports pitches, tennis courts, a bowling green and an adventure playground (NEAP standard). The site is designated in the East Suffolk Local Plan as 'historic parkland'</p>
<p>Local in character and is not an extensive tract of land</p>	<p>Carlton Park is approximately 11 hectares in total which when considered in the context of the overall area of the town is local in character and not an extensive tract of land.</p>



Figure 57: Carlton Park.

<p>3. Seaman Avenue Playground</p>	
<p>Description: Seaman Avenue playground is a Neighbourhood Equipped Area for Play (NEAP) and is owned by Saxmundham Town Council.</p>	
<p>In reasonably close proximity to the community it serves</p>	<p>The playground is within a residential area and close to the Free School.</p>
<p>Demonstrably special to a local community and holds a particular local significance</p>	<p>The playground is an essential feature of town life, providing facilities for 8 -14-year-olds, including a teenage shelter.</p>
<p>Local in character and is not an extensive tract of land</p>	<p>The playground is in character with a town playground and is approximately 2 hectares in size.</p>

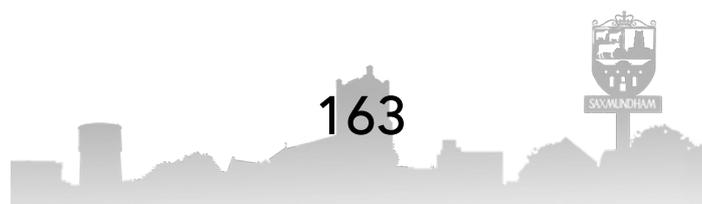




Figure 58: Seaman Avenue Playground.

4. Chantry Road Playground

Description: Chantry Road Playground is a Local Area for Play (LAP) and is owned by Saxmundham Town Council.

In reasonably close proximity to the community it serves

Chantry Road Playground is adjacent to the town centre.

Demonstrably special to a local community and holds a particular local significance

The playground is an essential feature of town life providing facilities for 4 – 6-year-olds.

Local in character and is not an extensive tract of land

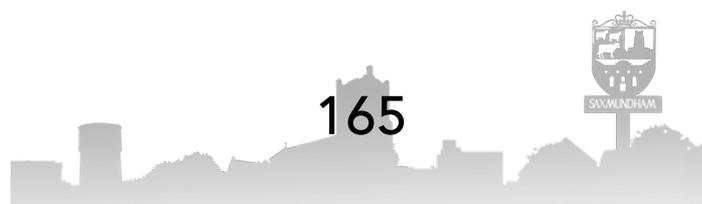
The playground is in character with a town recreational space and is approximately 0.5 hectares and not an extensive tract of land.



Figure 59: Chantry Road Playground.

5. Thurlow Close Playground	
Description: Thurlow Close Playground is a Local Area for Play (LAP) and is owned by East Suffolk Council.	
In reasonably close proximity to the community it serves	Thurlow Close playground is within a large housing estate.
Demonstrably special to a local community and holds a particular local significance	Thurlow Close playground provides facilities close to home for 4–6-year-olds.
Local in character and is not an extensive tract of land	Thurlow Close Playground is in character with a residential area recreation space and surrounding green area and is approximately 1.12 hectares in size and is not an extensive tract of land.
 <p>Figure 60: Thurlow Close Playground.</p>	

6. The Community Garden at the former Fromus Centre at Seaman Avenue	
Description: The community garden has plots cultivated by local residents. It is owned by Suffolk County Council.	
In reasonably close proximity to the community it serves	The Community Garden is situated within a residential area and close to the school.
Demonstrably special to a local community and	The Community Garden was created by residents to help offset food miles and produce locally grown food.



holds a particular local significance	
Local in character and is not an extensive tract of land	It is local in character (approximately 0.1 hectares) and not an extensive tract of land.
<div style="display: flex; align-items: flex-start;">  <div style="margin-left: 20px;"> <p>Figure 61: The Community Garden at the former Fromus Centre.</p> </div> </div>	

7. Garden of The Old Bank (formerly Sax 'cess House)	
Description: The garden of Sax 'cess House is a community garden run by the Access Community Trust.	
In reasonably close proximity to the community it serves	The garden is in the town centre.
Demonstrably special to a local community and holds a particular local significance	The garden is for all to enjoy and also provides support and activities for the disadvantaged and isolated.
Local in character and is not an extensive tract of land	The garden is in character with a town centre location and is not an extensive tract of land (Approximately 0.1 hectares).

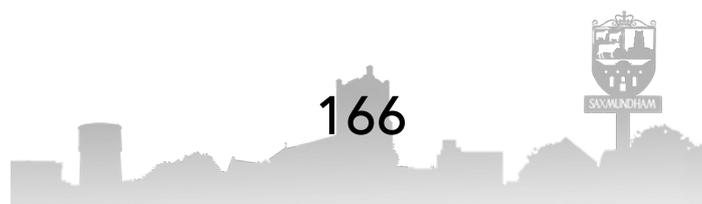




Figure 62: Garden of The Old Bank, formerly Sax'cess House

8. Gull Stream path

Description: The Gull Stream path is an enhanced public footpath owned and maintained by East Suffolk Council.

In reasonably close proximity to the community it serves

The Gull Stream Path passes through a large area of housing

Demonstrably special to a local community and holds a particular local significance

The Gull Stream path provides a wildlife corridor, areas of SUDS and an alternative route to the centre of town away from traffic.

Local in character and is not an extensive tract of land

The Gull Stream Path is local in character and not an extensive tract of land.(Approximately 1 hectare)

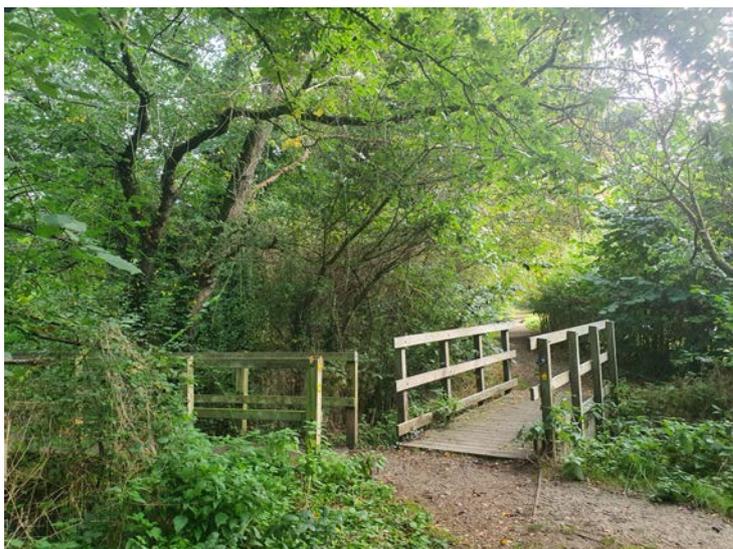


Figure 63: Gull Stream path.

9. Saxon Road allotments	
Description: Allotments owned by Housing Association for use by Housing Association tenants.	
In reasonably close proximity to the community it serves	Located within the built-up area and surrounded by residential development
Demonstrably special to a local community and holds a particular local significance	Community value through their use as allotments by the Housing Association tenants
Local in character and is not an extensive tract of land	The allotments are local in character and not an extensive tract of land. Approximately 0.03 acres.
 <p>Figure 64: Saxon Road allotments.</p>	

11. Fromus Green and Play Area	
Description: Fromus Green and Play Area is an open amenity space and includes a children’s play area. It is owned and maintained by East Suffolk Council.	
In reasonably close proximity to the community it serves	Fromus Green is in the town centre between the High Street and Hopkins Homes housing estate.
Demonstrably special to a local community and holds a particular local significance	Fromus Green is an essential feature of the town being the only open space for general community use in the heart of the town.

Local in character and is not an extensive tract of land

Fromus Green is in character with a town recreational space and at 1.12 hectares is not an extensive tract of land when considered in the context of the area of the town a whole.



Figure 65: Fromus Green and Play Area.

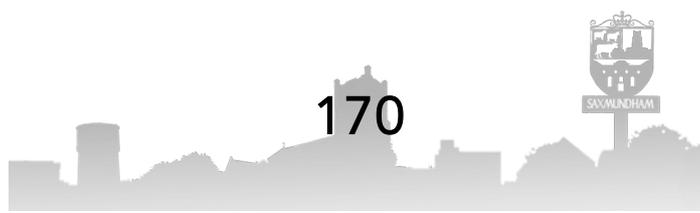


Appendix D: Glossary

Glossary of terms used and/or relevant to the Saxmundham Neighbourhood Plan and supporting submission documents.

Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20 per cent below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) **Starter homes:** is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of Plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.
- c) **Discounted market sales housing** is that sold at a discount of at least 20 per cent below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- d) **Other affordable routes to home ownership** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20 per cent below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.



Ancient or veteran tree: A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value. All ancient trees are veteran trees. Not all veteran trees are old enough to be ancient but are old relative to other trees of the same species. Very few trees of any species reach the ancient life-stage.

Archaeological interest: There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

Backland Development: Development that involves the re-use of parts of a number of rear gardens to existing houses for further residential development.

Carbon Free: Where the construction and operation of a development does not involve the use of carbon or its release into the atmosphere

Climate change adaptation: Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Climate change mitigation: Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Commercial Development: Retail, business uses, offices, workshops, light industrial

Conservation: The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.



Designated heritage asset: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.

Development plan: Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.

Employment Uses: Former B1 now Use Class E g) i-iii) – Offices, administration, light industry, research and development.

Environmental impact assessment: A procedure to be followed for certain types of projects to ensure that decisions are made in full knowledge of any likely significant effects on the environment.

Green infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Habitats site: Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

Health and Social Care, Community Support Services : Use Classes E e) . Medical services not attached to the premises of the practitioner.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.



Hospitality: Use Classes E a), E b), includes Public Houses, bars, cafes, restaurants, hotels, etc.

Infill Development: Development that takes place on small gaps between existing buildings.

International, national and locally designated sites of importance for biodiversity: All international sites (Special Areas of Conservation, Special Protection Areas, and Ramsar sites), national sites (Sites of Special Scientific Interest) and locally designated sites including Local Wildlife Sites.

Local housing need: the number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach.

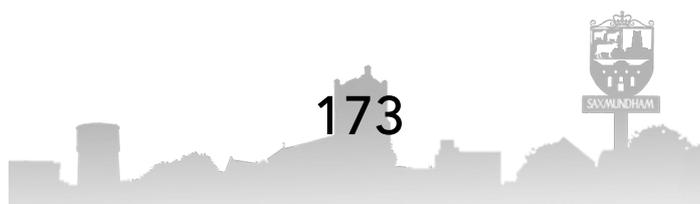
Local planning authority: The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority include the district council, London borough council, county council, Broads Authority, National Park Authority, the Mayor of London and a development corporation, to the extent appropriate to their responsibilities.

Local plan: A plan for the future development of a local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. A local plan can consist of either strategic or non-strategic policies, or a combination of the two.

Major development: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floor space of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Mitigation Hierarchy: A term to incorporate the avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity.

Nationally Significant Infrastructure Projects (NSIPs): NSIPs are large scale major development projects in England or Wales which fall into the following categories: energy, transport, waste, waste water, water. They can be projects such as: power generating stations, offshore wind farms, electricity lines, new roads, railway lines,



hazardous waste facilities, waste-water treatment plants and reservoirs. As this type of development is nationally important, consent for a project needs to be given by the government rather than the local planning authority.

Neighbourhood Development Order: An Order made by a local planning authority (under the Town and Country Planning Act 1990) through which parish councils and neighbourhood forums can grant planning permission for a specific development proposal or classes of development.

Neighbourhood plan: A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area. In law this is described as a neighbourhood development plan in the Planning and Compulsory Purchase Act 2004.

Non-strategic policies: Policies contained in a neighbourhood plan, or those policies in a local plan that are not strategic policies.

Non-designated heritage asset: Local planning authorities may identify non-designated heritage assets. These are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'. A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage interest for their significance to be a material consideration in the planning process. (Definition from <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#non-designated-heritage-assets>).

Older people: People over or approaching retirement age, including the active, newly retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

Open space: All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Original building: A building as it existed on 1 July 1948 or, if constructed after 1 July 1948, as it was built originally.

Out of centre: A location which is not in or on the edge of a centre but not necessarily outside the urban area.



Out of town: A location out of centre that is outside the existing urban area.

Planning condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning obligation: A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Playing field: The whole of a site which encompasses at least one playing pitch as defined in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Primary shopping area: Defined area where retail development is concentrated.

Priority habitats and species: Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

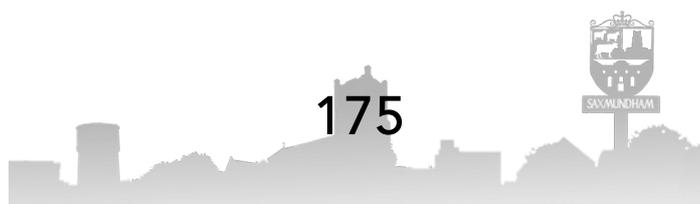
Ramsar sites: Wetlands of international importance, designated under the 1971 Ramsar Convention.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Retail: Use Classes Ea, F1 and F2a – Shops, local commerce.

Self-build and custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

Service industries: Use Classes E c i), ii), iii) Businesses not involved in manufacturing that provide a service e.g. finance, banking, estate agents, accountants, personal services, hairdressers, beauticians, opticians, etc.



Setting of a heritage asset: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Significance (for heritage policy): The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance.

Strategic environmental assessment: A procedure (set out in the Environmental Assessment of Plans and Programmes Regulations 2004) which requires the formal environmental assessment of certain plans and programmes which are likely to have significant effects on the environment.

Strategic policies: Policies and site allocations, which address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004.

Strategic policy-making authorities: Those authorities responsible for producing strategic policies (local planning authorities, and elected Mayors or combined authorities, where this power has been conferred). This definition applies whether the authority is in the process of producing strategic policies or not.

Supplementary planning documents: Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.

Sustainable Drainage Systems (SuDS): is a term for a set of environmentally-friendly techniques that are designed to help manage and control surface water runoff. They do not apply to foul water drainage. Examples of SuDS include drainage lagoons, attenuation basins, swales, green roofs and permeable paving.



Sustainable transport modes: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.

Suitable Alternative Natural Greenspace (SANG): High quality natural/semi natural green space.

Tandem development: Development on land set back behind existing properties often existing houses, utilising brownfield or garden land generally with limited street frontage.

Transport assessment: A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport, and measures that will be needed to deal with the anticipated transport impacts of the development.

Transport statement: A simplified version of a transport assessment where it is agreed the transport issues arising from development proposals are limited and a full transport assessment is not required.

Travel plan: A long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives and is regularly reviewed.

Wildlife corridor: Areas of habitat connecting wildlife populations. Windfall sites: Sites not specifically identified in the development plan.

Use Classes Order: National classification of land uses as contained within The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) (No. 2) Order 2021 (source: www.legislation.gov.uk).

Windfall Development: Development that takes place on sites not usually identified in the development plan. They typically include subdivisions, barn conversions or small infill plots.

Appendix E: Saxmundham Design Guidelines and Codes for the Neighbourhood Plan Area





Energy Projects Report, Town Council Meeting, 12 January 2026

With the exception of a few communications from the National Grid Electricity Transmission (NGET) Sea Link Examination, December 2025 was thankfully a quiet month for Energy Projects news. It allows time to reflect on the first quarter of 2026 and the work that will be required. Whilst the Sea Link Examination continues into 2026, National Grid Ventures (NGV) Lion Link project will be roaring into life.

NGV, LionLink

Statement of Community Consultation (SoCC) – December 2025, the project includes:

1. Kiln Lane Substation (Friston)
2. Proposed Underground High Voltage Alternating Current (HVAC) cables between Kiln Lane Substation and the proposed Converter Station (Saxmundham)
3. Proposed Converter Station (Saxmundham)
4. Proposed underground High Voltage Direct Current (HVDC) cables between the proposed Converter Station and Landfall (Walberswick)
5. Landfall (Walberswick)
6. Proposed Offshore HVDC cables from the Landfall (Walberswick) to the edge of the UK EEZ

Plus temporary associated works to facilitate construction, including temporary access roads, construction sites and compounds, highway works, utility and drainage works. It would also provide opportunities for environmental mitigation, compensation and enhancement.

Timetable:

1. **Statutory Consultation – from 13 January 2026 – March 2026.**
2. DCO application – 2026-2027
3. Examination – 2027
4. Decision – 2028
5. Construction – 2028-2032

Public Exhibitions:

1. Saturday 24 January 2026 from 11.00am to 4.00pm – Fromus Centre, Saxmundham
2. Saturday 31 January 2026 from 11.00am to 4.00pm – Walberswick Village Hall
3. Friday 6 February 2026 from 2.00pm to 7.00pm – High Lodge Leisure, Darsham
4. Saturday 21 February 2026 from 11.00am to 4.00pm – Westleton Village Hall
5. Saturday 28 February 2026 from 11.00am to 4.00pm, Yoxford Village Hall

Parish/Town Webinars:

1. Tuesday 27 January 2026 from 6.00pm to 7.30pm
2. Wednesday 11 February 2026 from 6.00pm to 7.30pm

Public Webinars:

1. Wednesday 4 February 2026 from 6.00pm to 7.30pm
2. Tuesday 3 March 2026 from 6.00pm to 7.30pm

Stakeholder briefings and meetings:

Will be available for parish councils, where all or part of the parish falls within the Primary Consultation Zone (PCZ)

Deposit Locations for materials: (Includes some information to be distributed and for reference only: PEIR NTS, Options Siting and Routeing Report, Plans and drawings and Guide to using the consultation plans and drawings)

- The Town House, Saxmundham – Monday to Friday 9.00am to 4.00pm
- Saxmundham Library – Daily except Thursdays.
- Plus Southwold, Leiston and Halesworth libraries.

Contact email: info@lionlink.nationalgrid.com

Other developers' projects:

A list that does not include: South Saxmundham Garden Neighbourhood and associated employment areas and Essex and Suffolk Water Recycling, Transfer and Storage Project.

NGET, Sea Link:

The Examining Authority (ExA) issued Written Questions on 17 December, 2025 with replies required by 9 January 2026. Whilst Saxmundham Town Council was not requested to respond, the Clerk and I considered it important to comment in connection to questions relating to landscape vision and, in light of the recent tragic road traffic accident, traffic using the B1119/A12 junction.

Issue Specific hearings commence w/c 26 January 2026 and are due to run over three consecutive days, Wednesday to Friday. These will be 'blended' events held at Excel London, Ufford Park and virtually via Teams. Considering that the Ufford Park venue will not be attended by the ExA and the Applicant, and the costs of attending in person in London, the Clerk and I will attend virtually.

Thereafter:

- Written post hearing submissions are due by 10 February 2026
- Requests to be heard at further Open Floor Hearings (OFH) in relation to 'changes' (Benhall Bridge) are due by 17 February 2026
- Dates reserved for hearings further Issue Specific Hearings (ISH), OFH and/or ExA's second written questions – w/c 23 February 2026

With the coalescence of the Sea Link Examination and the Statutory Consultation of Lion Link, it will not just be a busy time for the Town Council, but likely a time when our community will feel unsettled and will look to us for guidance.

Gnb/31 January 2026

Saxmundham Town Council

Committee Meeting	Town Council
Meeting Date	12 January 2026
Item Number	11
Report Title	Town Clerk Report
Report Author	Sharon Smith, Town Clerk

Staff Activities

You might reasonably wonder what Officers do all day! In addition to the day-to-day administration that keeps the Council functioning, including servicing Committees, managing finances, responding to correspondence and enquiries, and ensuring statutory and governance compliance, Officers will also be undertaking a range of significant projects during the final quarter of the financial year. The following sets out the work planned for this period.

Town Clerk

The Town Clerk will be undertaking work to support Councillors in progressing a number of the Council's key strategic priorities and statutory responsibilities, including:

- Supporting the Council through major milestones, including the Modified Neighbourhood Plan, the South Saxmundham Garden Neighbourhood masterplan, the Sea Link examination, the Lion Link statutory consultation, and the Market Hall redevelopment proposals.
- Leading the delivery of the new Town Council website and overseeing work with an illustrator to develop Art Deco-style travel poster imagery showcasing Saxmundham's key landmarks, for use on the destination website and potential future town signage.
- Liaising with a specialist metal fabricator to progress proposals for new signage at Fromus Square and securing external grant funding to support both signage projects.
- Ensuring compliance with new audit requirements relating to IT governance and data protection, including finalising and embedding updated IT and GDPR policies, practices, and training.
- Overseeing and coordinating the prioritisation and progression of further refurbishment and maintenance of the Gannon Rooms.
- Progressing the first registration with HM Land Registry for the Market Hall and the Gannon Rooms
- Completing the final requirements to secure the NALC Local Council Award Scheme (Silver Level).
- Supporting other Officers, including assisting the Environment Coordinator to progress the *Empowering Nature* initiative, supporting the Community Officer with delivery of the destination website, and assisting the Deputy Town Clerk in progressing proposals to link footpaths within the Memorial Field and to develop an allotment garden at Saxon Road.

Deputy Town Clerk

The Deputy Town Clerk will be progressing several operational workstreams, including:

- Progressing refurbishment works to the Market Hall, including replacing the rear door and repairing the rear windows. Listed Building Consent has been received, and the project is now moving forward, alongside work to secure grant funding to support the scheme.
- Leading preparations for the reopening of the Market Hall following the recent flooding incident, including overseeing the reinstallation of flooring and, in the interim, ensuring the kitchen is deep cleaned, internal noticeboards are refreshed, and the building is fully prepared for the proposed reopening on 1 March.

- Implementing actions arising from the Market Hall fire risk assessment to ensure ongoing compliance and safety.
- Progressing actions arising from the recent play equipment inspection reports to ensure ongoing safety.
- Leading the Saxon Road allotment garden proposal, including liaison with the Council's solicitors and the landowner in respect of the lease and tenancy agreement, and securing funding to support delivery of the project.
- Progressing proposals to link footpaths within the Memorial Field.
- Progressing work to bring a second Speed Indicator Device into operation.

Community Officer

The Community Officer will be recovering from the delivery of the Christmas Fayre, which was a significant success despite the Market Hall being unavailable, and progressing a range of community-facing initiatives, including:

- Developing and bringing forward ideas for a programme of small-scale events to be delivered during the remainder of the year, making use of the remaining budget provision.
- Leading on the delivery of the new destination website, working closely with external partners as required.
- Creatively designing new signage for the town's play areas and for the wildlife walk, enhancing the visitor experience.
- Arranging a Mystery Visitor Audit and Market Health Check in partnership with East Suffolk Council.

Environment Officer

Following a mutually agreed change of job title, the Environment Coordinator role has been redesignated as Environment Officer.

The Environment Officer will be progressing a range of environmental, biodiversity, and climate-resilience initiatives, including:

- Supporting The Art Station to work towards securing *Nature Town Accreditation*.
- Working in partnership with the Town Clerk to progress the *Empowering Nature* initiative, liaising with Suffolk Wildlife Trust and East Suffolk Council's Cabinet Member for the Environment.
- Planning a *Biodiversity Blitz Day* on Fromus Green in partnership with the Greenprint Forum, to establish a baseline species count for the site.
- Designing and delivering edible planters at the Gannon Rooms, enabling service users to enjoy access to free, freshly grown herbs.
- Developing early-stage proposals to improve flood resilience within the town, including exploring the potential use of 'leaky' water butts and the feasibility of a digital app to encourage residents to store rainwater during periods of heavy rainfall and synchronise its release during periods of drought, thereby reducing pressure on drainage infrastructure.
- Exploring opportunities for rainwater harvesting from the Town House to provide a sustainable water source for High Street hanging baskets during the summer months.

Assistant Town Clerk and Maintenance Officer

The Assistant Town Clerk and Maintenance Officer will principally be undertaking day-to-day administrative and maintenance duties and providing practical and operational support to the Town Clerk, Deputy Town Clerk, Community Officer, and Environment Officer in the delivery of their respective work programmes.

SAXMUNDHAM TOWN COUNCIL - DECEMBER 2025

01/12/2025

Balance Brought Forward - Unity Trust Bank Current	£2,111.22
Balance Brought Forward - Unity Trust Bank Savings	£85,054.69
Balance Brought Forward - Cambridge Building Society	£20,000.00
Balance Brought Forward - Public Sector Deposit Fund	£150,000.00
	£257,165.91

Payments/Transfers from Unity Trust Bank Current

Invoice Date	PO No	Supplier	Description	Gross	VAT	Net	Code	Authority
05/12/2025	n/a	HMRC	PAYE - Month 8	£2,208.84	£0.00	£2,208.84	4000	Pre-Approved Payments List
24/12/2025	n/a	Nest	Pensions - Month 9	£549.41	£0.00	£549.41	4000	Pre-Approved Payments List
24/12/2025	n/a	Staff Salaries	Salaries - Month 9	£8,002.76	£0.00	£8,002.76	4000	Pre-Approved Payments List
09/12/2025	n/a	EE	Mobile Phone - Month 9	£19.20	£0.00	£19.20	4260	Pre-Approved Payments List
28/11/2025	n/a	The Cleaning Company	Cleaning - Month 8	£291.16	£48.53	£242.63	4200	Pre-Approved Payments List
03/12/2025	n/a	Smartest Energy	Electricity - Month 8	£82.74	£3.94	£78.80	4205	Pre-Approved Payments List
03/12/2025	n/a	Smartest Energy	Gas - Month 8	£137.80	£6.56	£131.24	4205	Pre-Approved Payments List
11/12/2025	n/a	Everflow	Water - Month 9	£31.04	£0.00	£31.04	4205	Pre-Approved Payments List
31/12/2025	n/a	Unity Trust Bank	Bank Charges - Month 9	£12.90	£0.00	£12.90	4235	Pre-Approved Payments List
31/12/2025	n/a	Unity Trust Bank	Cheque Charges	£0.60	£0.00	£0.60	4235	Pre-Approved Payments List
28/11/2025	n/a	OfficeFlow	Photocopier Service Charge - Month 9	£124.52	£20.75	£103.77	4240	Pre-Approved Payments List
14/11/2025	74/25TC	Suffolk Digital Print & Design	Christmas Fayre - Promotion	£352.80	£58.80	£294.00	4505	Civic and Community Committee - 15/25CC
27/11/2025	n/a	Lisa Hamon	Christmas Fayre - Tree Decorations	£11.76	£1.96	£9.80	4505	Pre-Approved Payments List
02/12/2025	n/a	Sharon Smith	Christmas Fayre - General Supplies	£30.53	£5.09	£25.44	4505	Pre-Approved Payments List
06/12/2025	66/25TC	ABC Radio	Christmas Fayre - Compere	£350.00	£0.00	£350.00	4505	Civic and Community Committee - 15/25CC
16/12/2025	68/25TC	Royal British Legion Band	Christmas Fayre - Entertainment	£300.00	£0.00	£300.00	4505	Civic and Community Committee - 15/25CC
06/12/2025	n/a	Harris Handyman Services	Christmas Fayre - Contracted Help	£40.00	£0.00	£40.00	4505	Civic and Community Committee - 15/25CC
15/12/2025	72/25TC	Santa's Grotto - Elf 1	Christmas Fayre - Contracted Help	£42.50	£0.00	£42.50	4505	Civic and Community Committee - 15/25CC
15/12/2025	72/25TC	Santa's Grotto - Elf 2	Christmas Fayre - Contracted Help	£42.50	£0.00	£42.50	4505	Civic and Community Committee - 15/25CC
15/12/2025	72/25TC	Santa's Grotto - Elf 3	Christmas Fayre - Contracted Help	£52.50	£0.00	£52.50	4505	Civic and Community Committee - 15/25CC
22/12/2025	72/25TC	Santa's Grotto - Responsible Adult	Christmas Fayre - Contracted Help	£60.00	£0.00	£60.00	4505	Civic and Community Committee - 15/25CC
16/12/2025	108/25TC	Market Hall	Christmas Fayre - Santa's Grotto Costumes	£68.97	£11.49	£57.48	4505	Civic and Community Committee - 15/25CC
09/12/2025	107/25TC	Nick Jackson	Christmas Fayre - Santa's Grotto Decoration	£593.80	£0.00	£593.80	4505	Civic and Community Committee - 15/25CC
12/12/2025	n/a	Sharon Smith	Christmas Fayre - General Supplies	£12.00	£0.00	£12.00	4505	Civic and Community Committee - 15/25CC
16/12/2025	n/a	Sharon Smith	Christmas Fayre - General Supplies	£19.98	£3.34	£16.64	4505	Civic and Community Committee - 15/25CC
10/12/2025	n/a	Lisa Hamon	Christmas Fayre - General Supplies	£17.70	£0.00	£17.70	4505	Civic and Community Committee - 15/25CC
11/12/2025	n/a	Jess Palmer	Christmas Fayre - General Supplies	£3.99	£0.67	£3.32	4505	Civic and Community Committee - 15/25CC
11/12/2025	n/a	Jess Palmer	Christmas Fayre - Decorations	£259.89	£0.00	£259.89	4505	Civic and Community Committee - 15/25CC
16/12/2025	73/25TC	George Farnham Gallery	Christmas Fayre - Electricity	£30.00	£0.00	£30.00	4505	Civic and Community Committee - 15/25CC
16/12/2025	n/a	Sharon Smith	Stationery	£13.99	£2.33	£11.66	4245	Pre-Approved Payments List
28/11/2025	113/25TC	The Saxmundham and District CIC	Hall Hire - Market Hall Redevelopment	£24.00	£0.00	£24.00	4220	Pre-Approved Payments List
24/11/2025	93/25TC	MessageMaker	Speed Indicator Device	£3,435.00	£572.50	£2,862.50	4824	Amenities and Services Committee - 4/25AS
25/11/2025	106/25TC	Red Dune	Councillor Tablets x 3	£516.89	£86.15	£430.74	4255	Town Council - 65/27TC
30/11/2025	n/a	JT Peggs and Sons	General Supplies	£25.50	£4.25	£21.25	4650	Pre-Approved Payments List
17/12/2025	95/25TC	Gannon Institute	Contingency Fund Transfer - Thermal Efficiency	£2,898.00	£0.00	£2,898.00	4500	Resources Committee - 73/25RC
17/12/2025	n/a	Market Hall	Canva - Annual Subscription	£100.00	£0.00	£100.00	4250	Pre-Approved Payments List
08/12/2025	n/a	Amy Rayner	Green Team - Plants	£7.60	£0.00	£7.60	4810	Pre-Approved Payments List
30/11/2025	44/25TC	JT Peggs and Sons	Green Team - Mulch	£661.28	£110.21	£551.07	4810	Pre-Approved Payments List
17/12/2025	n/a	Market Hall	Green Team - Thank You Gifts	£191.56	£0.00	£191.56	4810	Pre-Approved Payments List
09/12/2025	88/25TC	Social Bar	Green Team - Thank You Event	£91.70	£7.81	£83.89	4810	Pre-Approved Payments List
				£21,715.41	£944.38	£20,771.03		

Lloyds Bank Multipay Card

Invoice Date	PO No	Supplier	Description	Gross	VAT	Net	Code	Authority
10/12/2025	n/a	Lloyds Bank	Monthly Fee	£3.00	£0.00	£3.00	4235	Pre-Approved Payments List
				£3.00	£0.00	£3.00		

Receipts to Unity Trust Bank Current

Received	Invoice No	Payer	Description	Amount	Code
22/12/2025	TC70	Gannon Institute Trust	Cleaning Reimbursement - Month 7	£63.25	4200
22/12/2025	TC96	Gannon Institute Trust	Cleaning Reimbursement - Month 8	£50.60	4200
12/12/2025	TC76	Stall Holder	Weekly Market - November	£30.00	1100
08/12/2025	TC77	Stall Holder	Weekly Market - November	£40.00	1100
01/12/2025	TC82	Stall Holder	Christmas Fayre	£30.00	1100
01/12/2025	TC83	Stall Holder	Christmas Fayre	£20.00	1100
12/12/2025	TC84	Stall Holder	Christmas Fayre	£20.00	1100
02/12/2025	TC87	Stall Holder	Christmas Fayre	£90.00	1100
01/12/2025	TC89	Stall Holder	Christmas Fayre	£30.00	1100
05/12/2025	TC90	Stall Holder	Christmas Fayre	£30.00	1100
04/12/2025	TC93	Stall Holder	Christmas Fayre	£30.00	1100
09/12/2025	TC98	Stall Holder	Christmas Fayre	£30.00	1100
17/12/2025	TC99	Stall Holder	Christmas Fayre	£30.00	1100
12/12/2025	n/a	Eventbrite	Christmas Fayre - Santa's Grotto Ticket Sales	£161.82	1100
29/12/2025	n/a	Jess Palmer	Christmas Fayre - Santa's Grotto Donation	£5.00	1305
09/12/2025	n/a	Northumbrian Water	Non Intrusive Site Survey Licence Fee	£250.00	1110
02/12/2025	n/a	CCLA	Interest	£490.80	1090
09/12/2025	n/a	Unity Trust Savings	Transfer	£20,000.00	n/a
21/12/2025	n/a	Unity Trust Savings	Transfer	£10,054.69	n/a
29/12/2025	n/a	Unity Trust Bank	Transfer from Unity Trust Bank Savings	£35,000.00	n/a
				£66,456.16	

Transfers from Unity Trust Savings

Received	Invoice No	Payee	Description	Amount
09/12/2025	n/a	Unity Trust Savings	Transfer	£20,000.00
21/12/2025	n/a	Unity Trust Savings	Transfer	£10,054.69
29/12/2025	n/a	Unity Trust Savings	Transfer	£35,000.00
				£65,054.69
		31/12/2025	Balance Carried Forward - Unity Trust Bank Current	£46,848.97
			Balance Carried Forward - Unity Trust Bank Savings	£20,000.00
			Balance Carried Forward - Cambridge Building Society	£20,000.00
			Balance Carried Forward - Public Sector Deposit Fund	£150,000.00
				£236,848.97

Line Number	Cost Centre	Nominal Code	Item	Approved Budget 2025-2026	Income and Expenditure 30/11/25	Committed 30/11/25	Actual Plus Committed 30/11/25	Actual Plus Committed Percentage	Forecast Income and Expenditure to 31/03/26	Forecast Total to 31/03/26	Forecast Percentage to 31/03/26	Forecast Surplus/Deficit
			INCOME									
			RESOURCES COMMITTEE - ADMINISTRATION AND CONSULTANCY									
1	100	1076	Precept	£ 278,037	£ 278,037	£ -	£ 278,037	100%	£ -	£ 278,037	100%	
4	103	1090	Bank Interest	£ 4,000	£ 2,856	£ -	£ 2,856	71%	£ 2,840	£ 5,696	142%	£ 1,696
			Total	£ 282,037	£ 280,893	£ -	£ 280,893		£ 2,840	£ 283,733		
			CIVIC AND COMMUNITY COMMITTEE - CIVIC SERVICES									
6	105	1100	Market Stallage/Christmas Event	£ 1,800	£ 1,320	£ -	£ 1,320	73%	£ 782	£ 2,102	117%	£ 302
			Total	£ 1,800	£ 1,320	£ -	£ 1,320		£ 782	£ 2,102		
			AMENITIES AND SERVICES COMMITTEE - PARKS AND RECREATION									
7	107	1110	Land Rental	£ 603	£ 651	£ 2	£ 653	108%	£ -	£ 653	108%	£ 50
			Total	£ 603	£ 651	£ 2	£ 653		£ -	£ 653		
			TOTAL INCOME	£ 284,440	£ 282,864	£ 2	£ 282,866		£ 7,244	£ 286,488		£ 2,048
			EXPENDITURE									
			STAFFING COMMITTEE - STAFFING RESOURCE									
9	120	4000	Salaries	£ 125,683	£ 83,046	£ 39,474	£ 122,520	97%	£ -	£ 122,520	97%	£ 3,163
10	120	4050	Staff Expenses	£ -	£ 39	£ -	£ 39		£ -	£ 39		£ 39
11	120	4055	Payroll Service	£ 350	£ 186	£ 186	£ 372	106%	£ -	£ 372	106%	£ 22
12	120	4060	Recruitment	£ 100	£ -	£ -	£ -	0%	£ 100	£ 100	100%	£ -
13	120	4095	Staff Training and Development	£ 2,500	£ 2,901	£ 252	£ 3,153	126%	£ -	£ 3,153	126%	£ 653
14	140	4120	Councillor Training and Development	£ 300	£ 1,454	£ -	£ 1,454	485%	£ -	£ 1,454	485%	£ 1,154
			Total	£ 128,933	£ 87,626	£ 39,912	£ 127,538		£ 100	£ 127,638		
			RESOURCES COMMITTEE - ADMINISTRATION AND CONSULTANCY									
15	140	4105	Councillor Expenses	£ 50	£ 146	£ -	£ 146	292%	£ -	£ 146	292%	£ 96
16	140	4275	Elections Contingency	£ 1,000	£ -	£ 1,000	£ 1,000	100%	£ -	£ 1,000	100%	£ -
17	160	4200	Town House Cleaning	£ 3,000	£ 1,734	£ -	£ 1,734	58%	£ 1,266	£ 3,000	100%	£ 0
18	160	4205	Town House/Youth Booth Utilities	£ 3,200	£ 1,728	£ -	£ 1,728	54%	£ 1,472	£ 3,200	100%	£ -
19	160	4210	Town House Refuse Collection	£ 1,250	£ 1,268	£ 150	£ 1,418	113%	£ -	£ 1,418	113%	£ 168
20	160	4220	Meeting Room Hire	£ 600	£ 801	£ -	£ 801	134%	£ 48	£ 849	142%	£ 249
21	160	4228	Financial Software	£ 3,500	£ 3,261	£ 1,898	£ 1,363	39%	£ -	£ 1,363	39%	£ 2,137
22	160	4230	Internal and External Audit	£ 1,250	£ 1,154	£ -	£ 1,154	92%	£ -	£ 1,154	92%	£ 96
23	160	4235	Bank Charges	£ 153	£ 136	£ -	£ 136	89%	£ 60	£ 196	128%	£ 43
24	160	4240	Photocopier Lease and Toner	£ 2,000	£ 1,378	£ 249	£ 1,627	81%	£ 500	£ 2,127	106%	£ 127
25	160	4245	Stationery	£ 1,300	£ 433	£ -	£ 433	33%	£ 150	£ 583	45%	£ 717
26	160	4250	Subscriptions	£ 1,800	£ 2,047	£ 7	£ 2,054	114%	£ -	£ 2,054	114%	£ 254
27	160	4255	IT Support	£ 4,050	£ 3,599	£ 1,783	£ 5,382	133%	£ -	£ 5,382	133%	£ 1,332
28	160	4260	Telephone and Broadband	£ 1,000	£ 664	£ 244	£ 908	91%	£ -	£ 908	91%	£ 92
29	160	4265	Town House Equipment and Supplies	£ 1,000	£ 1,289	£ -	£ 1,289	129%	£ -	£ 1,289	129%	£ 289
30	160	4270	Insurance	£ 1,800	£ 4,953	£ 2,822	£ 2,131	118%	£ -	£ 2,131	118%	£ 331
31	310	4615	Legal Consultancy	£ 1,000	£ 750	£ -	£ 750	75%	£ -	£ 750	75%	£ 250
32	310	4705	Project Consultancy	£ 6,000	£ 3,803	£ 2,000	£ 5,803	97%	£ 500	£ 6,303	105%	£ 303
33	170	4300	Town House - PWLB Repayment	£ 10,700	£ 10,689	£ -	£ 10,689	100%	£ -	£ 10,689	100%	£ 11
34	170	4406	Gannon Institute - PWLB Repayment	£ 2,903	£ 1,465	£ 1,438	£ 2,903	100%	£ -	£ 2,903	100%	£ 0
			Total	£ 47,556	£ 41,298	£ 2,150	£ 43,448		£ 3,996	£ 47,443		
			CIVIC AND COMMUNITY COMMITTEE - CIVIC AND COMMUNITY SERVICES									
35	200	4400	Newsletter and Publicity	£ 1,500	£ 1,055	£ -	£ 1,055	70%	£ -	£ 1,055	70%	£ 445
36	200	4405	Website Support and Development	£ 4,000	£ 4,563	£ 2,625	£ 7,188	180%	£ -	£ 7,188	180%	£ 3,188
37	140	4100	Chairs Civic Allowance	£ 400	£ 310	£ 108	£ 418	105%	£ -	£ 418	105%	£ 18
38	200	4825	Markets Support	£ 500	£ 289	£ -	£ 289	58%	£ 211	£ 500	100%	£ -
39	300	4555	Community Grants	£ 34,500	£ 26,300	£ -	£ 26,300	76%	£ 8,200	£ 34,500	100%	£ -
40	320	4505	Events	£ 10,000	£ 3,650	£ 5,600	£ 9,250	92%	£ 750	£ 10,000	100%	£ 0
41	320	4560	Christmas Lights and Trees	£ 6,700	£ -	£ 6,630	£ 6,630	99%	£ -	£ 6,630	99%	£ 70
			Total	£ 57,600	£ 36,167	£ 14,963	£ 51,130		£ 9,161	£ 60,291		
			AMENITIES AND SERVICES COMMITTEE - TOWN HOUSE									
42	600	4670	Building Maintenance	£ 250	£ 1,323	£ 820	£ 2,143	857%	£ -	£ 2,143	857%	£ 1,893
43	160	4285	Health and Safety	£ 1,100	£ 1,077	£ -	£ 1,077	98%	£ -	£ 1,077	98%	£ 23
			Total	£ 1,350	£ 2,400	£ 820	£ 3,220		£ -	£ 3,220		
			AMENITIES AND SERVICES COMMITTEE - PARKS AND RECREATION									
44	500	4829	Memorial Field	£ 6,000	£ 2,045	£ 3,188	£ 5,233	87%	£ -	£ 5,233	87%	£ 767
45	500	4830	Street Furniture	£ 3,000	£ 2,127	£ 903	£ 3,030	101%	£ -	£ 3,030	101%	£ 30
46	500	4810	Green Team Activities	£ 3,000	£ 1,023	£ 1,000	£ 2,023	67%	£ 977	£ 3,000	100%	£ -
47	500	4815	Grounds Maintenance	£ 3,300	£ 1,489	£ 1,811	£ 3,300	100%	£ -	£ 3,300	100%	£ -
48	500	4821	Tree Survey and Maintenance	£ 2,600	£ 1,760	£ -	£ 1,760	32%	£ -	£ 1,760	68%	£ 840
49	600	4650	General Town Maintenance	£ 1,000	£ 316	£ -	£ 316	32%	£ 150	£ 466	47%	£ 534

Saxmundham Town Council

Committee	Town Council
Meeting Date	12 January 2026
Item Number	11c
Report Title	Forecast Reserves Report
Report Author	Sharon Smith, Town Clerk/RFO

The forecast reserve position as at 31 March 2026 is set out below. This forecast represents a best effort estimate at the present time and remains subject to change, as it will be influenced by income received and expenditure incurred during the remaining three months of the financial year.

General Reserve Forecast

The current forecast shows a closing reserve balance of **£125,244**, comprising earmarked reserves of **£31,455** and general reserves of **£93,788**. Based on three months' budgeted net revenue expenditure of **£69,509**, this would result in a forecast surplus general reserve of **£24,279** above the Council's minimum reserve threshold.

It should be noted that, in accordance with the Council's adopted Reserves Policy, the minimum level of General Reserves is calculated by reference to budgeted net revenue expenditure, rather than actual year-end expenditure. This approach recognises that a proportion of actual expenditure is supported by earmarked reserves, Community Infrastructure Levy, and external grant funding, and therefore does not represent recurring operational spend.

Earmarked Reserves Forecast

Reserve	Balance
Capital Replacement Fund	£10,000.00
Elections Contingency	£1,000.00
Greener Sax Community Garden	£4,206.48
Green Micro-Grants	£250.00
Destination Website	£4,275.00
Saxon Road Allotment Garden	£3,000.00
Community Infrastructure Levy 2025/26	£8,723.84
Total	£31,455.32



SAXMUNDHAM TOWN COUNCIL

OPEN SPACES POLICY

Review Body: Amenities and Services Committee

Policy Approved: Town Council

Approval Date:

Minute Item:

Review Period: Annual

Next Review:



Saxmundham's Open Spaces

The Town Council manages the Memorial Field as an open space for the benefit of the residents of Saxmundham:

Purpose

- a) To encourage residents and visitors to use and enjoy Saxmundham's open spaces.
- b) To promote activities that enhance quality of life, support active and healthy living, and build community cohesion.
- c) To celebrate Saxmundham's strong historical and environmental heritage alongside its vibrant contemporary culture.

Activities that will be considered

- a) Events organised by registered charities for the purpose of raising money for local and national charities.
- b) Events organised by voluntary groups or organisations for the purpose of benefiting the local community and/or raising money for local and national charities.
- c) Commercial events of local, national and international importance or significance that promote the town to a wider audience and encourage visitors to Saxmundham.
- d) Events and activities that aim to enhance the environment of the open space, educate users, encourage participation and promote the leisure activities or opportunities available.
- e) Civic events.

Prohibited Events

The Town Council will not give approval for events on its land of the following nature:

- a) Any event likely to provoke public disorder.
- b) Any event that includes the use of performing animals, except those which are normally regarded as domesticated in the UK (i.e. horses, dogs, cats, birds used in falconry, caged birds and rabbits), which may be used as an ancillary part of a performance. No live animals are to be used as prizes.
- c) Any event that would cast doubt on the integrity of the Town Council.
- d) Any event the Town Council believes may be of questionable public morality.
- e) Balloon and Chinese lantern releases are not permitted for environmental reasons.



Fees And Application Process

- a) The Amenities and Services Committee will have the discretion and ultimate decision to determine whether a proposed event falls within the programme exclusions.
- b) Applications for small community events should be submitted where possible 6 weeks before the event. Large events should be submitted 12 weeks before the event and East Suffolk Council should be notified of the details of the event. Events submitted outside the dates will be considered at the discretion of the Town Council.
- c) Fees are reviewed annually. The aim of the Town Council is not to generate profit but to recover reasonable costs and support the ongoing maintenance and improvement of the Memorial Field.
- d) The fee for hiring the Memorial Field for charities, schools, voluntary groups and local non-profit organisations shall be £50 per session.
- e) The fee for hiring the Memorial Field for commercial events shall be £300 per session.
- f) The Town Clerk has discretion to determine the length of a session and to apply an appropriate fee accordingly.
- g) Registered charities, non-profit making and local community groups may be granted use of the Memorial Field free of charge for fundraising events benefitting local and national charities, subject to approval by the Amenities and Services Committee.
- h) Additional charges may be applied for the use of staff time, materials or equipment supplied by the Town Council during an event.

Terms and Conditions

- a) The hirer will keep the Town Council indemnified against all losses, claims, demands, actions, proceedings, damage, costs or expenses or other liability arising in any way from this licence.
- b) The hirer must observe any directions that the Town Council may make from time to time, governing their land.
- c) The hirer at the hirers expense must immediately make good any damage to any part of the Town Council's land or any part of it.
- d) The hirer must make police aware of any car parking arrangements and cones must be placed on the roads, around the land in order that residents' drives are not blocked.
- e) The Town Council requires that event organisers comply with all relevant legislation relating to the control of noise and the protection of the immediate and local environment.



- f) Organisers will be encouraged to work with local residents and the relevant authorities to minimise the impact of events on the local community. Any residents within the vicinity should have a letter posted through their door advising of the event, and a contact number to call for queries.
- g) The protection of the park environment, wildlife and features will be a primary consideration when planning and approving events. A refundable ground deposit may be required in advance to cover costs for refuse removal, reinstatement, or repairs following an event.
- h) In the case of severe weather, including very wet ground conditions or high winds creating dangerous conditions (particularly around trees), the Town Council reserves the right to cancel the event or require the event organiser to introduce appropriate safety or ground protection measures. Where it is necessary to cancel an event for safety or environmental reasons, this will be done in consultation with the hirer. The Town Council will not be liable for any costs or losses incurred because of such cancellation. Any decision to cancel an event on these grounds will be final.
- i) Promoters and organisers of events remain responsible for the marketing and promotion of their event and shall be required to make adequate provision for it comply with the relevant licensing and planning legislation. Flyposting for events will not be permitted, and the necessary permissions must be obtained for any promotional banners or posters erected.
- j) Operating hours for events will be between 9am to 11pm (excluding set-up and set-down). **The main gate must be locked when leaving the site to avoid unauthorised vehicle access.**
- k) Applications for events in open spaces will be dealt with on a first come first served basis, excepting that recurring annual events will be given priority if they are staged on regular dates.
- l) The Town Council will consider events on the basis of those permitted events and prohibited events as referred to above. References may be required and taken up where the content of an event needs further confirmation. The Town Council accepts no responsibility for the impact of refusing an event.
- m) Event organisers cannot hold an event in the Town Council's open spaces without the Town Council's written permission. This permission will be granted at the discretion of the Town Council and only following satisfactory completion of the Open Space application documents.
- n) Evidence of adequate insurance and risk assessment will also be required. Organisers will be required to obtain and provide evidence to the Town Council of Public and Employers Liability Insurance to a minimum value of £10 million. For organisations that do not have this level of cover the Amenities and Services Committee has discretion to accept lower public liability coverage if this is approved by the Town Council's insurers.
- o) Hirers must comply with all relevant Health and Safety Legislation and provide a site-specific risk assessment for any activities.
- p) Hirers must provide a copy of their safeguarding policy where activities involve children, young people, or vulnerable adults and demonstrate that staff or volunteers have appropriate DBS checks were required.



- q) If collecting money, a Street Collection Permit must be obtained from East Suffolk Council and a copy submitted to the Town Council.
- r) If alcohol is being sold the appropriate licence from East Suffolk Council must be in obtained.
- s) When using or connecting to the water point in the Memorial Garden, prior consent must be obtained from the Town Council and further instructions will be supplied.
- t) The compost area is for onsite green waste only and must only be used with prior written consent from the Town Council. Green waste must be added to the top of the heap and care taken to avoid the heap moving further out onto the grass.
- u) The goals can only be moved with the prior written consent of the Town Council and further instructions will be supplied.
- v) In order to avoid damage to the land drains and water pipes on the Memorial Field, large vehicles and heavy loads must NOT be driven or parked over the water supply pipe which runs parallel to the main driveway from between the Scout Hut and the Youth Booth to the Memorial Garden.



SAXMUNDHAM TOWN COUNCIL
APPLICATION FOR USE OF OPEN SPACES

1.	Name of Organisation	
2.	Type of organisation Eg community or commercial	
3.	Name of applicant	
4.	Address of applicant	
5.	Email of applicant	
6.	Role in organisation	
7.	Date Requested	
8.	Times Requested Including set up time and clear up time	
9.	Registered Charity Number (if applicable)	
10.	Event/Activity Planned	
11.	Mobile Telephone Number to be used when the event is happening	



I confirm I have read the "Saxmundham Open Spaces Policy" and I have provided the following information in order that the application can be processed without delay (please tick):

- Application form with all questions completed.
- A copy of the organisation's Public Liability Insurance Certificate for the amount of £10,000,000.
- A completed risk assessment for the activity to be carried out on the performance area.
- If collecting money, a copy of the Street Collection Permit issued by East Suffolk Council.
- A copy of the child safeguarding policy or vulnerable adults' policy if relevant to the activities on site
- Details of East Suffolk's Event Licence if required.

DECLARATION

- I have read the Saxmundham Open Spaces Policy **and further instructions document**, and I agree to the terms and conditions as specified.
- I also agree to keep Saxmundham Town Council indemnified against all losses, claims, demands, actions, proceedings, damage, costs or expenses or other liability arising in any way from this licence.
- I certify that, to the best of my knowledge and belief, the information provided is correct and complete.

Signed.....

Date.....

Print Name.....

Position.....

Please return the completed form, together with the supporting documents to:

Town Clerk, Saxmundham Town Council, The Town House, Station Approach, Saxmundham, IP17 1BW
Email: townclerk@saxmundham-tc.gov.uk



Appendix 1 – Further Information

- a) The code to unlock the main gate at the front of the Memorial Field is 3223
- b) When using or connecting to the water point in the Memorial Garden
 - Only use the water point with prior consent from the Town Council
 - To use the tap in the Memorial Garden, a 10mm socket is required
 - Please **do not** disconnect the hose inside the irrigation box
 - Use the external hose and connector for the irrigation system to fill or attach to
 - If required, use the small section of extra hose kept in the irrigation point and attach to the external hose
 - Please ensure that the tap is off and the box is secure before leaving
- c) Goals can only be moved with the prior written consent of the Town Council and require a minimum of 4 people to move them. The goals are padlocked to ground pegs and to move the goals, the padlocks must be removed using keys available at the Town Council Office. Goals should be moved to a location agreed by the Town Council.