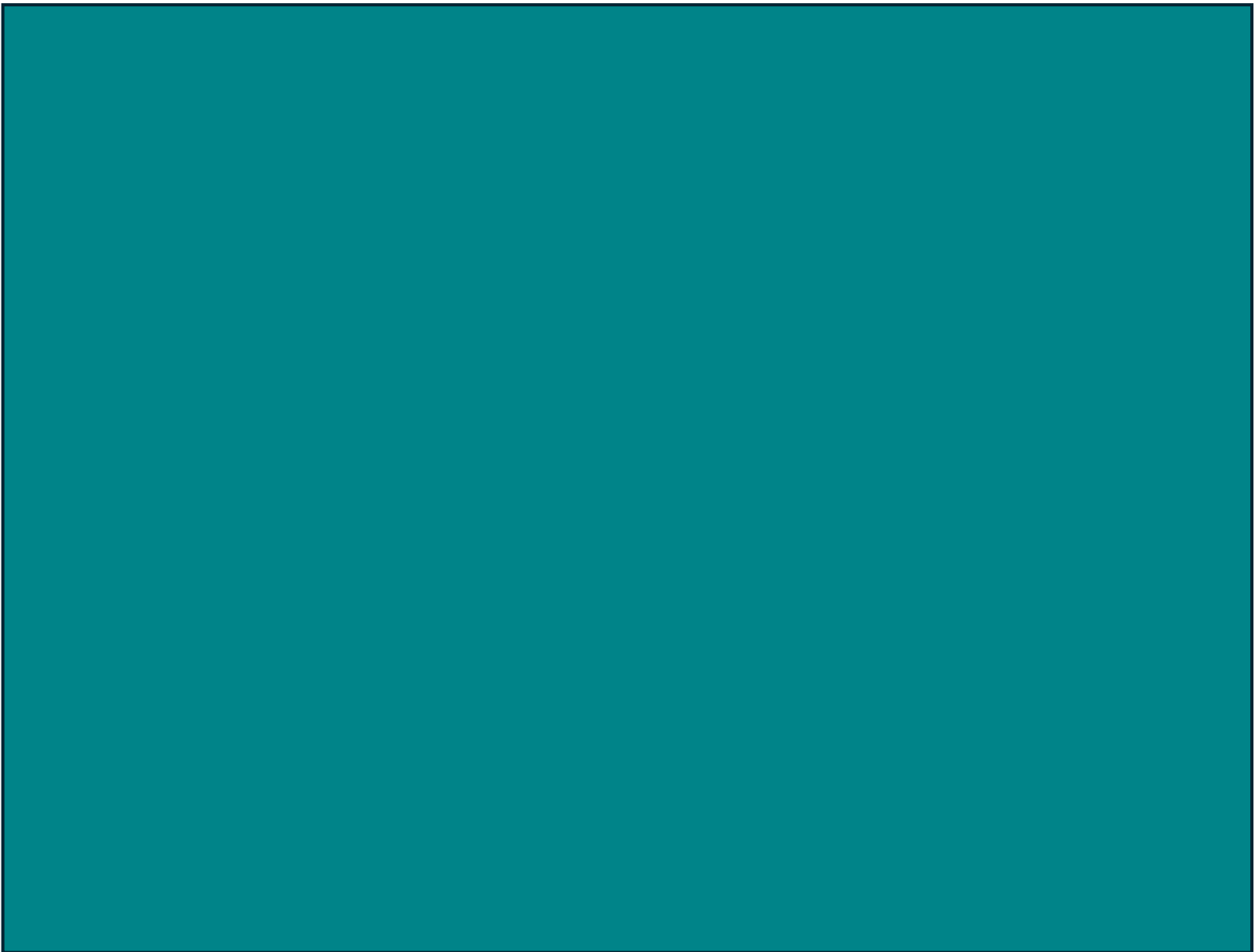


South Saxmundham Garden Neighbourhood

Planning Statement

Planning Application – PP-14830352

April 2026



Issue Sheet

Pigeon Investments

Planning Statement

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Approved by: Pigeon			
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1. Introduction

- 1.1.1. LDA Design has been instructed on behalf of Pigeon (“The Applicant”) to prepare and submit an outline planning application, with all matters reserved except for access and drainage, for development of land known as South Saxmundham, in East Suffolk (grid reference: easting (637939), northing (262449)) hereafter referred to as ‘the Site’.
- 1.1.2. The Site is located to the south of Saxmundham within the administrative boundary of East Suffolk Council (ESC) and is on the border between Saxmundham Town and Benhall Parish. The application is submitted to ESC as the Local Planning Authority (the ‘LPA’).
- 1.1.3. The outline planning application is for the development of approximately 800 homes, setting for a new primary school and pre-school, roadside services and employment, community uses, green and blue infrastructure, new walking and cycling infrastructure, and associated infrastructure and works, with all matters reserved except for access and primary drainage infrastructure.
- 1.1.4. The majority of the Site is allocated in the Suffolk Coastal Local Plan and the Proposed Development will provide much needed housing, including affordable housing, employment space and new community uses in line with the requirements of Policy SCLP12.29.
- 1.1.5. The proposals set out in the supporting documents with this application are landscape-led and have sought to protect and enhance existing landscape and biodiversity features where possible, incorporating them into the design of the green infrastructure network and open spaces. The character of the garden neighbourhood responds positively to the local area, provide a design response to strategic highways and rail infrastructure and taking influences for the Site’s contribution to the historic growth of Saxmundham. Further details of the application proposals are provided in the Design and Access Statement, enclosed with the application.

1.2. The Applicant

- 1.2.1. Pigeon is a property company with expertise in land promotion, commercial and residential development, and property investment operating within the East and South East of England, with particular experience and expertise in bringing together teams of leading designers and specialist advisors to deliver high-quality residential and mixed-use sustainable communities, including a number of schemes across Suffolk and Essex.

1.2.2. Pigeon believes that engaging with the people that live and work near the schemes helps to deliver high-quality designs – an approach that has been highly commended by local communities and local authorities.

1.3. Description of development

1.3.1. This planning application seeks planning permission for the following development:

“Outline planning permission for approximately 800 homes, setting for a new primary school and pre-school, roadside services and employment, community uses, green and blue infrastructure, new walking and cycling infrastructure, and associated infrastructure and works, with all matters reserved except for access and primary drainage infrastructure.”

1.3.2. The purpose of this Planning Statement is to demonstrate that the Proposed Development will deliver a development in accordance with the objectives of national planning policy and the adopted development plan.

1.4. Pre-Application Engagement and Consultation

1.4.1. Community engagement for the scheme began in November 2020 with a series of meetings with Saxmundham Town Council and neighbouring parish councils of Benhall & Sternfield and Kelsale-sum-Carlton. The meetings focused on gaining feedback on early optioneering for the masterplan framework.

1.4.2. Engagement with the local councils was followed up by an online public engagement event through a dedicated website between 3 December 2020 and 31 January 2021, seeking views from the local community on the access and highways, the design of new homes, planned infrastructure, open space provision, connectivity and sustainability. Leaflets were distributed to 2,700 homes across Saxmundham and Benhall prior to the website going live. The website received 718 visits, and 93 feedback forms were provided.

1.4.3. A pre-application request was submitted to ESC in February 2025 to undertake the Suffolk Design Management Process to engage with the Council on the preparation of a Masterplan Framework Document (MFD) for the scheme. Between April 2025 and July 2025, a series of workshops were held with officers covering the following topics:

- Consultation Strategy
- Land use and Placemaking
- Access and Movement
- Green and Blue Infrastructure
- Parameter Plans

- S106 Heads of Terms and Planning Obligations

- 1.4.4. Written feedback was received from officers following the workshop on 30 July 2025 and contributed to amendments to the MFD placemaking strategy, access and movement strategy and landscaping strategy.
- 1.4.5. Additional advice was provided by the Council on the 19th September 2025, focusing on the principle of development and the additional land and uses including in the Proposed Development.
- 1.4.6. Further advice was provided on 16th December 2025, providing follow up advice to a Masterplan workshop held 10th November 2025. This focused on comments relating to the Masterplan Framework Document and preparation of an outline planning application.
- 1.4.7. A Design Review Panel was attended on 1st July 2025 by Frame Projects, an independent design focused project management consultancy, East Suffolk District Council, Benhall and Sternfeld Parish Council, Saxmundham Neighbourhood Planning Group and representatives of the project team in July 2025. The Design Review Panel include a guided site visit followed by a presentation to the panel. Comments received were taken on board and helped to shape further detail on the Proposed Development including the Parameter Plans and Masterplan Framework Plan presented at the second public consultation event.

1.5. Environmental Impact Assessment

- 1.5.1. The Applicant considers that the Proposed Development constitutes EIA development, given the size of the Site, nature and scale of the Proposed Development and the surrounding environmental resources. Therefore, a voluntary Environmental Statement (ES) has been prepared and submitted as part of this Outline Planning Application.
- 1.5.2. In place of an EIA Scoping Report submitted to ESC, the Applicant has engaged in dialogue with ESC to seek agreement on those matters to be included within the EIA. The Applicant has verbally agreed with ESC that due to potential for likely significant effects relating to Landscape and Visual Impact and Transport and Access an EIA would be required.
- 1.5.3. In line with the approach set out above with ESC, the scope of the environmental topics considered in the EIA comprise the following:
- Transport and Access
 - Landscape and Visual impacts

1.5.4. Other environmental factors falling outside the agreed scope of the EIA have been considered in standalone planning documents and no other impacts have been identified that are likely to be significant in nature to result their inclusion within the Environmental Statement. Technical reports addressing other environmental factors not included in the ES have been submitted alongside as part of this Outline Planning Application.

1.6. Scope of the Application

1.6.1. This Outline Planning Application has been submitted on the basis of all matters being reserved except for access and preliminary drainage infrastructure.

1.6.2. The application seeks detailed approval for the primary vehicular access point of the A12, which includes details of the roundabout, the roundabout phasing and the primary road network up to the community hub, and preliminary drainage infrastructure which includes an outline drainage strategy and detailed designs for drainage basins across the Site.

1.6.3. These aspects are being sought in detail because it has been determined that these parts of the scheme are critical to understanding whether safe access can be achieved and surface water drainage can be effectively managed across the Proposed Development.

1.6.4. The application is supported by the following documents and plans:

- Application forms
- Planning Statement (including Housing Statement and Open Space Assessment)
- Design and Access Statement
- Environmental Statement
- Design Code
- Masterplan Framework Document
- Statement of Community Involvement
- Flood Risk Assessment (including Drainage Strategy)
- Phase 1 Contamination Assessment
- Agricultural Land Classification
- Heritage Impact Assessment (including a Geophysical Survey)
- Biodiversity Net Gain Statement (including BNG metric)
- shadow Habitats Regulations Assessment
- Ecological Impact Assessment
- Transport Assessment (including a Construction Traffic Management Plan)
- Travel Plan
- Arboricultural Impact Assessment (including a Tree Survey)

- Landscape and Visual Impact Assessment
- Landscape Strategy
- Utilities Assessment (including Foul Drainage Assessment)
- Minerals Resource Assessment
- Noise and Vibration Impact Assessment
- Air Quality Assessment
- Sustainable Construction Statement
- Health Impact Assessment
- Ground Water Monitoring

1.6.5. Drawings

- Site Location Plan [10598_SK001_A_]
- Site Boundary Plan [10598_SK003_A_]
- Masterplan Framework Plan (10598_PP06_Masterplan Framework]
- Land Use Parameter Plan [10598_PP01_Land Use and Placemaking]
- Green Infrastructure Parameter Plan [10598_PP02_Green Infrastructure]
- Movement and Connectivity Parameter Plan [10598_PP03_Movement_&_Connectivity]
- Building Heights Parameter Plan [10598_PP04_Building Heights]
- Densities Parameter Plan [10598_PP05_Densities]
- Site Wide Infrastructure Works [2308-007.PL15]

1.7. Structure of the Report

- 1.7.1. This Planning Statement provides a detailed description of the Proposed Development that is the subject of this Outline Planning Application and a planning assessment of the Proposed Development.
- 1.7.2. **Section 1** provides an introduction to the application, a summary of stakeholder engagement and pre-application, a summary of the Environmental Impact Assessment, a list of the supporting documents and plans submitted with the Outline Planning Application and the structure of this report.
- 1.7.3. **Section 2** sets out a detailed description of the Site and the surrounding context as well as the planning history of the Site.
- 1.7.4. **Section 3** outlines the planning policy context, which includes setting out the development plan, and the relevant policies, and any material considerations associated with the Proposed Development.
- 1.7.5. **Section 4** provides a planning assessment of the Proposed Development, drawing on the results of technical surveys and assessments, concluding with an overall planning balance assessment for the Site.
- 1.7.6. **Section 5** provides an assessment of the overall planning balance for the Proposed Development and details the planning benefits and harm.
- 1.7.7. **Section 6** provides a conclusion to the planning balance and planning assessment.

2. The Site

2.1. Site Location

- 2.1.1. The Site comprises approximately 62.9ha of land located directly south of Saxmundham, East Suffolk (refer to Figure 1-1). The Site is located approximately¹ 315m south of Saxmundham town centre (along Rendham Road) and approximately 30km northeast of Ipswich.
- 2.1.2. The Site is intersected and bordered by the A12 and the East Suffolk Railway Line. The Site is located close to coastal areas of Aldeburgh, Leiston and Thorpeness, alongside the presence of the nearby power station Sizewell.
- 2.1.3. The Site itself comprises a series of arable fields, largely bordered by hedgerows, trees, agricultural fields and Saxmundham to the north, as shown on Figure 3-1. In a number of locations geometrically shaped woodlands, such as Park Farm Covert in the north and Catsnap Belt in the east, are within the Site in addition to a series of hedgerows and trees. An extensive Public Right of Way (PRoW) network surrounds the Site and there are PRoWs within the Site boundary.
- 2.1.4. There is a single site with statutory national designation within 5km of the Site, namely Gromford Meadow Site of Special Scientific Interest, at a 3.3km distant. There are two County Wildlife Sites within 1km and another 22 within 5km.
- 2.1.5.

2.2. Site Characteristics

- 2.2.1. The A12 runs north/south through the Site connecting Ipswich in the southwest, via the A14, to Lowestoft and Great Yarmouth in the north, as well as linking London further southwest (M25 being approximately 105km from the Site), via the A14 and M25. Deadman's Lane is separated by approximately 315m west from the Site. Immediately adjacent to the southernmost extent is Kiln Lane; this joins Grays Lane and Main Road (B1121) further east, approximately 185m away.
- 2.2.2. In terms of major transport corridors, Junction 8 of the M11 is located southwest of the Site approximately 95km southwest, accessed via the A12, A14 and A120 at Birchanger Green Roundabout. The A14 is located approximately 25km southwest of the Site, accessed at Seven Hills Interchange and connects Felixstowe in the southeast to the A12.
- 2.2.3. The Site's topography appears to generally slope down eastwards, toward the River Fromus valley from approximately 33m above ordnance datum (AOD) in the northwest to approximately 22m AOD in the southeast, with some varied elevation across the Site.

¹ All distance measurements are rounded to the nearest 5m and given as an approximate.

- 2.2.4. The Site is linked to the local PRow network, with a number of PRow routes leading across the Site and to the surrounds. These include:
- Footpath 15 – Onsite, leading south from the northern boundary in proximity to the Mill Hole residential area to the railway crossing in the northeast
 - Footpath 18 – Onsite, leading southwest from the railway crossing in the northeast across the Site, merging centrally with Footpath 21 and 22 which lead to the A12.
 - Footpath 19 – Onsite, adjacent to the southern and western boundary of the A12 Roadside Services and Employment development areas; and
 - Footpath 21 and 22 – Onsite, leading across the SANG and adjacent to the SANG’s eastern boundary to the west of the railway line.
- 2.2.5. Those footpaths adjoining the Site include are;
- Footpath 16 and 17 in the northeast
 - Footpath 20 in the east
 - Footpath 23 in the southwest.
- 2.2.6. The Site is not located within an Air Quality Management Area (AQMA). The nearest AQMA is ‘Ipswich AQMA No.2’ approximately 25km southwest.
- 2.2.7. Saxmundham is located adjacent to the north of the Site, with residential properties, school site (former Saxmundham Middle School) and nursery, and a cemetery also immediately neighbouring. Apparent residential dwellings are located along Kiln Lane adjacent to the Site boundary to the southeast. Wider afield residential dwellings are located beyond the A12, approximately 270m west, and either side of Main Road (B1121), approximately 155m east.
- 2.2.8. The Site is not subject to any statutory ecological designated sites. The nearest Site of Special Scientific Interest (SSSI) is Gromford Meadow (SSSI) located approximately 5km south. The Site is located within Impact Risk Zones (IRZs) for SSSIs in a general southeast and western direction beyond that of Gromford Meadow SSSI.
- 2.2.9. The Site is not subject to any statutory historical designated sites. The nearest listed building to the Site is the Grade II Listed Benhall Cottage (List Entry Number: 1030908) located approximately 158m southeast. The nearest Registered Park and Garden is Glemham House Park and Garden (List Entry Number: 1486685) located approximately 2km east.

- 2.2.10. According to the Environment Agency's Flood Map for Planning, the Site is wholly located within Flood Zone 1 (less than 1 in 1,000 annual probability of river or sea flooding), which is considered to be an area of low probability of flooding. The Site is predominantly located within a very low (less than 0.1%) probability of surface water flooding; with extents/flow paths within the Site classed as having low to high probability (between 0.1% -1% and greater than 3.3%, respectively) of surface water flooding. The closest watercourse to the Site is River Fromus (EA main River), which is approximately 482m east.
- 2.2.11. The Site is underlain by bedrock of the Crag Group-Sand and superficial deposits of the Lowestoft Formation-Diamicton and Lowestoft Formation-Sand and gravel. The Site is within an area designated as a Principal aquifer (bedrock) and a Secondary (undifferentiated) (superficial drift) aquifer, and some extents of a Secondary A (superficial drift) aquifer. The Site is located within an area of Medium and Medium-High Groundwater Vulnerability. The Site is within Zone 3 of a Source Protection Zone.
- 2.2.12. In general, the soil in the far western and central extent of the Site comprises slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils, with loamy and clayey texture and impeded drainage (Soilscape 18). The southern, north-eastern and eastern extents of the Site comprise freely draining slightly acid sandy soils (Soilscape 10) with sandy texture and freely draining. In addition to which the central northern extent of the Site the soil is in general lime-rich loamy and clayey soils with clayey, some loamy texture and impeded drainage with slightly impeded drainage (Soilscape 9).

2.3. Planning History

- 2.3.1. The East Suffolk Council public access planning portal shows no historic planning applications within the site boundary, however an EIA screening request (DC/17/2269/EIA) was submitted 26 May 2017 for "*Proposed residential development, land for a new primary school, open space and country park*".
- 2.3.2. East Suffolk Council issued a decision notice on 26 June 2017 which concluded that an EIA would be required.

3. Description of Development

3.1. Housing, Building Type and Density

- 3.1.1. The housing provision of the Proposed Development comprises a mix of types, sizes and tenures. The provision ranges from one-bedroom houses to four-bedroom houses and one- and two-bedroom apartments, including serviced plots for custom/self-build and the provision of 1 in 3 homes as affordable housing.
- 3.1.2. The maximum building heights² of the residential provision of the Proposed Development are up to 3.5 storeys (14m). The building heights proposed are from ground level to the highest point of the building (excluding chimneys and communication equipment). Final ground and building floor levels for the Proposed Development may range +/-3m from existing ground levels to allow for tolerances of a final building platform. Maximum building heights of the housing provision is broken down below:
- Residential – up to 2.5 storeys (12m); and
 - Residential and Community uses – up to 3.5 storeys (14m).
- 3.1.3. The main access road will be tree lined and include flatted or terraced development at a higher density than other residential areas, to give the street the character of a busy boulevard. The exact distribution of maximum building heights is presented in the Building Height Parameter Plan [10598_PP04_Building Height Parameter Plan].
- 3.1.4. Density of the residential provision varies across the Site, with up to 40 dwellings per hectare (dph) (low density) and up to 45 dph (medium density) to achieve upto 800 new homes over a total land take of approximately 20.1ha.
- 3.1.5. Building densities is presented in the Densities Parameter Plan [10598_PP05_Densities_Parameter Plan].

3.2. 2FE Primary School and Pre School

- 3.2.1. The new 2FE Primary School and Pre-School provides a total land take of approximately 2.3ha and is located within the northern residential development area of the Site.
- 3.2.2. The maximum building height of the Primary School and Pre-School is up to up to 2 storeys (12m).

3.3. A12 Roadside Services

² Notes:

1. The height is taken from the ZTV, which has been generated from a receptor height of 1.6m (average eye level) and receiver heights of up to 16.5m (maximum development height). Multiple targets were placed within the site to best represent points that may be visible. The ZTV is based on LiDAR 1m First Return DSM (Digital Surface Model), which includes heights of objects, such as buildings and prominent blocks of vegetation. Some changes within the landscape may have occurred since the DSM data and ZTV was created. Data source: data.gov.uk.

3.3.1. The proposed A12 Roadside Services provides a total land take of approximately 5.1ha, which could include a hotel, fuel filling station, electric vehicle charging points and eateries and is located centrally to the west of the A12 in the western development area of the Site.

3.3.2. The maximum building heights of the A12 Roadside Services is up to up to 10m.

3.4. Employment

3.4.1. An area of employment, aligned with the allocation in the Suffolk Coastal Local Plan (Adopted 2020), provides approximately 6.2ha of employment uses ((Class B2, B8 and E)) and is located north of the A12 Roadside Services west of the A12 in the western development area of the Site.

3.4.2. The maximum building heights of the employment is up to up to 15m.

3.5. Community Uses

3.5.1. The community uses provides a total land take of approximately 0.4ha. The community uses are located centrally within the Site. It is accessible to all new residents of the community along the proposed access and movement travel route as well as being nearby to the 2FE Primary School and Pre-School.

3.5.2. The community uses consist of a community space, including a café, mobility hub, potential policing & commercial space, as well as an area of public realm alongside a naturalistic play area within the open space..

3.5.3. The maximum building height of the community uses including mobility hub are up to 3.5 storeys (14m).

3.6. Green and Blue Infrastructure

3.6.1. Green infrastructure as part of the Proposed Development is presented in the Land Use Parameter Plan. The below summary is based off such.

3.6.2. A land take of approximately 27.59ha of green infrastructure forms part of the Proposed Development which consists of SANG, allotments (indicative at submission) and open space (comprising Parks and Gardens and Amenity Space but excluding existing woodlands not part of SANG).

3.6.3. A total of approximately 15.55ha of SANG provision is provided at locations in the north, east, south and central development area of the Site. Woodland is located to the north and southeast of the Site. Allotments are located within the southern parcel of the Site and comprising 0.5ha of land take, there indicative location is outlined in the Land Use Parameter Plan. 11.54ha of open space (comprising Parks and Gardens and Amenity Space) is included as part of the Proposed Development located across the Site.

- 3.6.4. The green infrastructure network forms a key central spine to the Proposed Development that performs multiple functions, such as the primary walking and cycle route, a connecting route for the three SANG parcels, habitat connectivity and a drainage feature which incorporates the existing drainage ditches and new raingardens.
- 3.6.5. SuDS features, including attention basins and conveyance and attenuation swales, will be provided within the open space within the Site to improve the drainage functions of these areas and further enhance biodiversity. The network of drainage ditches that run along field boundaries will be retained and incorporated into the green corridors.
- 3.6.6. Further detail of the green and blue infrastructure on Site is presented in the Green Infrastructure Parameter Plan.

3.7. Access and Infrastructure

Vehicular Site Access

- 3.7.1. The Primary Vehicle Access Point is achieved off the A12 from a new entrance/exit. A primary road network will extend within the Site between elements of the Proposed Development to which the indicative alignment is shown on the Access and Connectivity Parameter Plan.
- 3.7.2. Primary access is being applied for in detail.

Footways and Cycleways

- 3.7.3. A key feature of the Proposed Development will be safe pedestrian and cycle routes to and across the A12. Primary and secondary pedestrian, cycling and wheeling routes, Public Rights of Way (PRoWs) including existing PRoW, a new PRoW link and PRoW diversion, and SANG walking routes extend within the Site, with the routing between elements of the Proposed Development shown on the Access and Connectivity Parameter Plan and noted as indicative where stated.
- 3.7.4. A primary walking and cycling route is also provided for along the main street, providing direct walking and cycling access from the community hub to the employment west of the A12.
- 3.7.5. Pedestrian Access Points and the Primary Pedestrian and Cycle Access Point number seven in total as presented in the Access and Connectivity Parameter Plan. The Primary Pedestrian and Cycle Access Point is located at the northeastern extent of the Site leading through Saxmundham Cemetery and providing the main link with the centre of Saxmundham. Pedestrian Access Points are taken from the Site's boundaries and build on/upgrade existing and/or form new access/exit points to the Site.

Public Transport

- 3.7.6. The location of the bus turning circle and bus stop will be provided along the main access road on the approach/at the mobility hub (as part of the community uses) to ensure that public transport and walking and cycling are prioritised as the modes of choice to access the community uses.

4. Planning Policy Context

4.1.1. This Section explains the main planning policies that are relevant to the Proposed Development. Under Section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be decided in line with the Development Plan unless material considerations indicate otherwise.

4.2. The Development Plan

4.2.1. The site is within the administrative area of East Suffolk Council. The Development Plan for East Suffolk Council comprises of the Suffolk Coastal Local Plan (2020), the East Suffolk Council Waveney Local Plan (2019) and the Suffolk Minerals and Waste Local Plan (SMWLP) 2020 as well as any relevant Neighbourhood Plans.

4.2.2. The site lies within the boundary of the Suffolk Coastal Local Plan and therefore the Waveney Local Plan is not relevant to the Proposed Development. The Suffolk Coastal Local Plan Review became five years old on 23 September 2025, and the Suffolk Coastal Local Plan Assessment (September 2025) concluded that due to an increase in the housing need figure for East Suffolk the Plan needs to be updated.

4.2.3. Preparation of a new Local Plan for East Suffolk will commence in April 2025³. A call for sites consultation close in January 2026 and adoption of the new Local Plan is anticipated in 2029 so should not impact the determination of this application.

4.2.4. The site also falls within the administrative boundary of Saxmundham, where there is a 'made' Neighbourhood Plan. The Saxmundham Neighbourhood Plan was 'made' in July 2023 and a modification to the Plan is currently being consulted by East Suffolk Council.

4.2.5. Together these plans will guide how land should be used and ensure that new housing is built in a sustainable way and benefits the local community.

4.3. Suffolk Coastal Local Plan (2020)

4.3.1. The East Suffolk Suffolk Coastal Local Plan sets out the policies to guide development from the period 2018 – 2036 within the former Suffolk Coastal administrative area. The key policies for determining the principle of development for the Proposed Development from Suffolk Coastal Local Plan are set out below.

³ [East Suffolk Local Development Scheme.pdf](#)

- 4.3.2. The growth strategy for East Suffolk is set out in policy SCLP3.1 ‘Strategy for Growth’, which specifies that over the plan period 2018-2036 the plan will supply 11.7ha of land for economic uses to help deliver at least 6,500 jobs and significantly boost the supply of housing by delivering 542 dwellings per annum (at least 9,756 new homes over the plan period).
- 4.3.3. The policy also states that the “*strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through:*
- f) The delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham;*
 - g) Utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and the A14 corridors;*
 - h) New employment allocations based around key transport corridors*
 - i) Strategies for market towns which seek to reflect and strengthen their role and economies”*
- 4.3.4. Policy SCLP3.2 ‘Settlement Hierarchy’ outlines the designations of settlements across the authority and stipulates that “*development requirements at Major Centres, Market Towns, Large Villages and Small Villages will be delivered through site allocations in the Local Plan*”. Saxmundham is designated as a Market Town under the settlement hierarchy.
- 4.3.5. Policy SCLP3.3 ‘Settlement Boundaries’ stipulates that “*proposals for new residential development outside of the Settlement Boundaries and outside of land which is allocated for development will be carefully managed in accordance with national planning policy guidance and the strategy for the Countryside*”
- 4.3.6. Policy SCLP3.5 ‘Infrastructure Provision’ outlines the Council’s approach to infrastructure provision and specifies that developers must consider the infrastructure requirements needed to support and service the proposed development. It stipulates that all development will be expected to contribute as necessary towards infrastructure provision to meet the needs generated.
- 4.3.7. The strategy for the Market Town of Saxmundham is set out in Policy SCLP12.28 ‘Strategy for Saxmundham’ which specifies that “*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 providing 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 around the principles of an inclusive community and integration with Saxmundham and the surrounding countryside through enhancing green infrastructure networks”

4.3.8. The Site is identified as a sustainable location for new Garden neighbourhood under Policy SCLP12.29 ‘Saxmundham Garden Neighbourhood’. The policy allocates “Approximately 67.8ha of land for a garden neighbourhood is identified to the south of Saxmundham, which includes land within the parish of Benhall, for an education led development, comprising primary school provision, community facilities, employment land and open space alongside a variety of residential development. This new development will be delivered through a masterplan approach brought forward through landowner collaboration and community engagement.

Critical to the success of this masterplan will be the integration of the new garden neighbourhood with the existing community of Benhall and Saxmundham, as well as taking into account the location of the site.

The masterplan should be informed by community engagement and include:

a) Provision of a one form of entry primary school on a 2.2ha site to enable further expansion and early years provision;

b) 0.1ha of land on the site should be reserved for a new early years setting should suitable and accessible alternative provision not be available elsewhere. Proportionate contributions will be required towards the additional early years provision;

- c) Community hub* comprising a variety of services and facilities to be located in an accessible location;*
- d) Project level Habitats Regulations Assessment and a significant area of Suitable Alternative Natural Greenspace which is designed to mitigate impacts on European protected sites;*
- e) Provision of green infrastructure, including informal and formal open spaces, circular walks, and retention and enhancement of the natural features on the site such as trees, woodland and hedgerows to be incorporated into the layout of the development;*
- f) Formal recreational opportunities to cater for all ages, including play space;*
- g) Public rights of way on the site should be preserved and enhanced;*
- h) Biodiversity networks and habitats to be preserved and enhanced, including measures to enhance biodiversity within housing areas;*
- i) Design and layout that supports a dementia friendly environment;*
- 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;*
- l) A site-specific Flood Risk Assessment which considers the cumulative impact on receptors off site;*
- m) Sustainable Drainage Systems (SuDS) to reduce the risk of surface water flooding and sewer flooding;*
- n) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity or that capacity can be made available;*
- o) Provision of new vehicular access point from the A12 supported by safe access for cyclists and pedestrians;*
- p) Significant pedestrian and cycle accessibility throughout the site, with connections and improvements to networks beyond the site, including to the station and town centre;*
- q) Provision of a Transport Assessment, with particular regard to the capacity of the B1121/B1119 signalised crossroads;*

r) Employment land to the west of the A12, to be masterplanned and delivered as part of the Garden Neighbourhood;

s) Approximately 800 dwellings of a range of types, sizes and tenures including housing to meet the needs of older people, younger and vulnerable people, and provision of self-build plots, including affordable housing on site;

t) Provision of appropriate police, community safety and cohesion facilities;

u) Any planning application should be supported by evidence which assesses the quality and quantity of sand and gravel resources on site in order to determine whether on-site resources should be used on-site during development; and

v) The area of land east of the railway is identified for the provision of open space and Suitable Alternative Natural Greenspace (SANG), to be masterplanned and delivered as part of the garden neighbourhood. The retention of existing uses on land to the east of the railway would be supported where this complements the delivery of open space and SANG.

The necessary off-site infrastructure requirements, including health provision and police facilities will be required through developer contributions. Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity will be required. Including, but not limited to, water recycling upgrades.

Any necessary off-site transport improvements will need to be provided to the satisfaction of Suffolk County Council."

- 4.3.9. The other relevant policies of the Suffolk Coastal Local Plan (2020) that will guide the assessment of the Proposed Development are set out below.
- 4.3.10. Policy SCLP4.2 'New Employment Development' provides support for new employment development and stipulates that "*Proposals for new employment development falling within use classes B1, B2 and B8 on land outside of Settlement Boundaries will be permitted where a need for additional employment development has been demonstrated or it can be demonstrated that there is no sequentially preferable land available adjacent to existing Employment Areas, within existing Employment Areas or within Settlement Boundaries and: a) It would not have an unacceptable adverse impact on surrounding land use; and b) It avoids, or adequately mitigates, any adverse impact on the character of the surrounding area and landscape, the AONB and its setting or the natural or historic environment*".

- 4.3.11. Policy SCLP4.8 ‘New Retail and Commercial Leisure Development’ sets out the councils position on retail and commercial leisure development being proposed on out of centre sites and stipulates that *“Proposals for retail or commercial leisure uses outside of Town Centres will only be permitted where it can be demonstrated that there will be no significant adverse impact on centres in the retail hierarchy and the neighbouring regional town centre of Ipswich.”*
- 4.3.12. Policy SCLP4.8 sets on impact thresholds which are measured in floorspace to determine whether an impact assessment is required. The thresholds are broken down by settlements in the retail hierarchy. Saxmundham Town Centre is a level 2 centre with a threshold of a gross floor space of 350sqm.
- 4.3.13. Policy SCLP4.10 ‘Town centre Environments’ sets out how development will *“encourage people to spend more time, enjoy and participate in town centres, including ensuring safe pedestrian access to link up with and enhancing existing pavements, pedestrian spaces, routes and focal points; improving access for cyclists, people with limited mobility and people with other disabilities; enabling physical linkages so that pedestrians can move easily and safely between parts of the town centre”.*
- 4.3.14. Policy SCLP5.8 ‘Housing Mix’ requires new residential developments within East Suffolk to deliver the housing needed for different groups in the community and stipulates that new development *“should provide a mix of housing tenures, types and sizes appropriate to the site size, characteristics and location, reflecting where feasible the identified need, particularly focusing on smaller dwellings (1 and 2 bedrooms)”*
- 4.3.15. Policy SCLP5.8 also requires developments of more than ten dwellings to demonstrate how the development will contribute to meeting the needs of older people and for proposal of more than 10 non-specialist dwellings to deliver 50% of dwellings that meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations.
- 4.3.16. The self-build and custom build housing requirement is set out in Policy SCLP5.9 ‘Self Build and Custom Build Housing’. The policy specifies that *“development of 100 or more dwellings will be expected to provide a minimum of 5% self or custom build properties through the provision of serviced plots”.*
- 4.3.17. Policy SCLP5.9 also requires *“proposals for 5 or more self build or custom build dwellings in a single site location”* to be development in accordance with a set of design principles that are submitted with the planning application.

- 4.3.18. The affordable housing requirements for East Suffolk are set out in Policy SCLP5.10 'Affordable Housing on Residential Developments' which specifies that on development of ten or more dwellings or site of 0.5ha or more a provision of 1 in 3 units should be affordable dwellings.
- 4.3.19. The policy sets out requirements for the tenure of affordable dwellings stipulating that *"50% should be for affordable rent / social rent, 25% should be for shared ownership and 25% should be for discounted home ownership"*.
- 4.3.20. The management of proposals for new tourist accommodation is determined by the requirements of Policy SCLP6.5 'New Tourist Accommodation' which states that *"tourist accommodation comprising permanent buildings will only be permitted:*
- *Within the Settlement Boundaries;*
 - *Through the conversion of buildings of permanent structure where they lie outside the Settlement Boundary;*
 - *On medium and large scale sites where commercial, recreational or entertainment facilities are provided on site; or*
 - *Where such development forms part of a comprehensive masterplan which supports wider landscape and ecological gain."*

4.3.21. Policy SCLP7.1 ‘Sustainable Transport’ specifies that “*development proposals should 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*”. The policy goes on to stipulate where development will be supported against the following criteria:

a) Any significant impacts on the highways network are mitigated.

b) It is proportionate in scale to the existing transport network.

c) All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken.

d) It is located close to and provides safe pedestrian and cycle access to services and facilities.

e) It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking.

f) It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network.

g) It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety.

h) The cumulative impact of new development will not create severe impacts on the existing transport network.”

4.3.22. Development is expected to contribute to the delivery of local sustainable transport strategies and “*proposals for new development that would have significant transport implications should be accompanied by a Travel Plan. A Travel Plan will be required for proposals for:*

i) New large scale employment sites.

j) Residential development of 80 or more dwellings.

k) A development that when considered cumulatively with other developments, is likely to have a severe impact on the local community or road network”.

4.3.23. Policy SCLP7.2 ‘Parking Proposals and Standards’ specifies that the level of parking provision required will depend on the location, type and intensity of use in new development, and that “*proposals that minimise congestion, encourage sustainable transport modes and reduce conflict between road users across the plan area will be supported*”.

- 4.3.24. Policy SCLP7.2 outlines that proposals that take opportunities to make efficient use of land will be supported and that proposals will be expected to have regard to the parking standards contained within the Suffolk Guidance for Parking.
- 4.3.25. Policy SCLP8.1 'Community Facilities and Assets' sets out the Councils position on new community facilities. The Council supports the delivery of new community facilities and assets to meet the needs of the local community. Proposals "*should be of a proportionate scale, well related to the settlement which it serves and would not adversely affect existing facilities that are easily accessible and available to the local community*".
- 4.3.26. Policy SCLP8.2 'Open Space' outlines that the Council supports the provision of open space and recreational facilities. It expects new residential development to contribute to the provision of open space and recreational facilities in order to benefit community health, wellbeing and green infrastructure.
- 4.3.27. Policy SCLP8.3 'Allotments' states that the Council encourages the provision of new allotments in order to meet a locally identified demand and that allotments and associated infrastructure should be located in locations well related to the existing community.
- 4.3.28. Policy SCLP9.2 'Sustainable Construction' sets the requirement for "*all new developments of more than 10 dwellings should achieve higher energy efficiency standards that result in a 20% reduction in CO2 emissions below the Target CO2 Emission Rate (TER) set out in the Building Regulations*" and for "*all new residential development in the plan area should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day*".
- 4.3.29. For new non-residential developments of equal or greater than 1,000sqm gross floorspace, Policy SCLP9.2 sets out a requirement "*to achieve the British Research Establishment Environmental Assessment Method 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so*".
- 4.3.30. Policy SCLP9.5 'Flood Risk' sets the requirement for all new development to exhibit the three main principles of flood risk, to be safe, resilient and not to increase flood risk elsewhere. The policy also advocates for natural flood risk management measures that ensure there is no significant depreciation of natural capital.
- 4.3.31. Policy SCLP9.6 'Sustainable Drainage Systems' requires "*developments of 10 dwellings or more, or non-residential developments of upwards of 1,000 sqm of floorspace or on sites of 1 hectare or more, to utilise drainage sustainable drainage systems*". The policy also restricts runoff rates from new development to greenfield runoff rates wherever possible.

- 4.3.32. Policy SCLP9.7 ‘Holistic Water Management’ requires all development “*to demonstrate that water can be made available to support the development and that adequate foul water treatment and disposal already exists or can be provided in time to serve the development*” and specifies that all new developments will be expected to incorporate water efficiency and re-use measures to maximums the opportunities to reduce water use.
- 4.3.33. Policy SCLP10.1 ‘Biodiversity and Geodiversity’ provides support for developments that can demonstrate that it “*maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat ‘stepping stones’*. All development should follow a hierarchy of seeking firstly to avoid impacts, mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for”.
- 4.3.34. Policy SCLP10.2 ‘Environmental Quality’ outlines that development proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination. It stipulates that development proposals will be “*considered in relation their impacts on:*
- a) Air quality, and the impact on receptors in Air Quality Management Areas;*
 - b) Soils and the loss of agricultural land;*
 - c) Land contamination and its effects on sensitive land uses;*
 - d) Water quality and the achievement of Water Framework Directive objectives;*
 - e) Light pollution; and*
 - f) Noise pollution.”*
- 4.3.35. Policy SCLP10.4 ‘Landscape Character’ sets out that “*proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018) or successor and updated landscape evidence*”.
- “Development proposals will be expected to demonstrate their location, scale, design and materials will protect and enhance:*
- a) The special qualities and features of the area;*
 - b) The visual relationship and environment around settlements and their landscape settings;*

c) Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;

d) Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and

e) The growing network of green infrastructure supporting health, wellbeing and social interaction.”

4.3.36. Policy SCLP11.1 ‘Design Quality’ sets out that the Council approach to design quality within new developments and stipulates that the Council “*will support 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*”.

4.3.37. Policy SCLP11.1 expects all new major residential proposals to perform positively when assessed against Building for Life 12 guidelines.

4.3.38. Policy SCLP11.2 ‘Residential Amenity’ sets out that the Council will have regard to the following criteria when considering the impact of development on residential amenity:

“a) Privacy/overlooking;

b) Outlook;

c) Access to daylight and sunlight;

d) Noise and disturbance;

e) The resulting physical relationship with other properties;

f) Light spillage;

g) Air quality and other forms of pollution; and

h) Safety and security.”

4.3.39. Policy SCLP11.3 ‘Historic Environment’ requires all development proposals with the potential to impact on heritage assets or their setting to be supported by a Heritage Impact Assessment and/or an Archaeological Assessment prepared by an individual with the relevant expertise.

- 4.3.40. Policy SCLP11.5 'Conservation Areas' sets out that development within, or which has the potential to affect the setting of, Conservation Areas will be assessed against the relevant Conservation Area Appraisal and Management Plan, and stipulates that proposals for development which affect the setting of a Conservation Area should be "*considered against criteria a), c) and e) of the policy:*
- a) *Demonstrate a clear understanding of the significance of the conservation area alongside an assessment of the potential impact of the proposal on that significance;*
 - c) *Be of an appropriate design, scale, form, height, massing and position;*
 - e) *Use high quality materials and methods of construction which complement the character of the area."*
- 4.3.41. Policy SCLP11.7 'Archaeology' stipulates that "*an archaeological assessment proportionate to the potential and significance of remains must be included with any planning applications in areas of known or suspected archaeological importance to ensure that provision is made for the presentation of important archaeological remains*".

4.4. Saxmundham Neighbourhood Plan

- 4.4.1. The Saxmundham Neighbourhood Plan (2022-2036) was 'made' in July 2023 and corrected in August 2023, and contains several planning policies that are relevant to the Proposed Development. The relevant policies of the Neighbourhood Plan are set out below.
- 4.4.2. Policy SAX1 'General design principles' requires development to reflect the town's local distinctiveness and character and seek to enhance its quality and ensure all component elements of a development like housing, existing trees, hedgerows, paths, open spaces, parking and green spaces are well connected to each other.
- 4.4.3. Policy SAX3 'New businesses' states that developments that enable the establishment and growth of new businesses, including small and medium sized enterprises, particularly in the retail and hospitality, traditional industries, energy sector, creative and cultural industries, digital industries and health. Social care and community support services will be supported.
- 4.4.4. Policy SAX4 'New community facilities' states that new community facilities will be supported, that include indoor sport and leisure provision within the town, entertainment, school and cultural facilities and local health services.

- 4.4.5. Policy SAX5 ‘Improving connectivity’ states that development should maximise walking and cycling through its location and design, and that 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.
- 4.4.6. The policy also states that “*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*”. It provides support for major new development south of the town and ‘indicative’ pedestrian and cycle connections.
- 4.4.7. Policy SAX6 ‘Public Rights of Way’ provides protections for existing Public Rights of Way and supports enhancements, and the creation of new routes where they are safe and attractive.
- 4.4.8. Policy SAX7 ‘Parking provision’ states that parking provision should be provided in accordance with the adopted parking standards for Suffolk County Council and provides guidance on the location of parking in new housing developments, providing minimum lengths and widths for off-street parking spaces.
- 4.4.9. Policy SAX9 ‘Tenure blind Housing Development’ specifies that where new affordable housing is to be provided it should not be distinguishable from other tenures in form, quality, and character. It also requires affordable housing to be spread throughout any new development.
- 4.4.10. Policy SAX11 ‘Non-designated Heritage Assets’ states that development proposals affecting 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.
- 4.4.11. Policy SAX12 ‘Gateways, views and the landscape setting of Saxmundham’ states that the “*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*”. It specifies that “*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*”.

- 4.4.12. Policy SAX13 ‘Protection and enhancement of natural assets’ states that “*development proposals will be expected to protect and enhance existing ecological networks and wildlife corridors*” and that “*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*”.
- 4.4.13. It also provides support for proposals that “*provide a minimum 10 per cent net gain in biodiversity through, for example:*
- a. The creation of new natural habitats.*
 - b. The planting of additional trees and hedgerows.*
 - c. The restoration and reparation of fragmented ecological networks”.*
- 4.4.14. Policy SAX14 ‘Community gardens and allotments’ states that “*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*”.
- 4.4.15. Policy SAX15 ‘Green Spaces’ requires trees, hedgerows, wildlife habitats, local green space, allotments and parks to be protected and connected, as well as the delivery of SANG in connection with South Saxmundham Garden Neighbourhood.

4.5. Suffolk Minerals and Waste Plan

- 4.5.1. The Suffolk Minerals and waste Local Plan (2020) guides how minerals and waste are managed in Suffolk. While it mainly deals with the problems and waste sites, it also sets out rules to make sure that new development is handle waste properly, protect environment and do not interfere with important minerals.
- 4.5.2. Policy MP10 ‘Minerals consultation and safeguarding areas’ is relevant to the determination of this application as the Site is located in a Minerals Consultation Area.

4.6. Other Material Considerations

National Planning Policy Framework

- 4.6.1. The National Planning Policy Framework (NPPF) is a material consideration in planning decisions. The NPPF was revised on 12 December 2024 and sets out the Government’s planning policies for England and how these are expected to be applied

- 4.6.2. At the heart of the NPPF is a presumption in favour of sustainable development. This means approving development proposals that accord with the Development Plan without delay (paragraph 11).

Section 2 Achieving Sustainable Development

- 4.6.3. Achieving ‘sustainable development’ in the context of the NPPF, means pursuing the following three overarching objectives, outlined at Paragraph 8:

- 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 coordinating the provision of infrastructure.
- 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 a 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;
- Environmental objective: to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy.

- 4.6.4. The objectives should be delivered through the application of the policies of the NPPF.

- 4.6.5. Paragraph 11 outlines that plans and decisions should apply a presumption in favour of sustainable development. It is clarified that, for decision taking, this means:

c) approving development proposals that accord with an up-to-date development plan without delay; or

d) where there are no relevant development plan policies, or the policies which are the most important for determining the application are out of date, granting permission, unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

Section 5: Delivering a sufficient supply of homes

- 4.6.6. Paragraph 61 confirms to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.
- 4.6.7. Paragraph 64 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required (including the minimum proportion of Social Rent homes required), and expect it to be met on-site unless:
- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and
 - b) the agreed approach contributes to the objective of creating mixed and balanced communities.
- 4.6.8. Paragraph 66 outlines that where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.

Section 8 Promoting healthy and safe communities

- 4.6.9. Paragraph 96 outlines Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:
- a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.
 - b) are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

c) enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

4.6.10. Paragraph 98 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.

b) take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

c) 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.

d) ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and service.

Section 9. Promoting sustainable transport

4.6.11. Paragraph 109 outlines that transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

a) making transport considerations an important part of early engagement with local communities.

b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

c) understanding and addressing the potential impacts of development on transport networks.

d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated.

e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and

f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

Section 11: Making effective use of land

- 4.6.12. Paragraph 124 outlines the importance of Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

Section 12: Achieving well-designed places

- 4.6.13. Paragraph 131 acknowledges that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 4.6.14. Paragraph 133 states that to provide maximum clarity about design expectations at an early stage, all local planning authorities should 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. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.
- 4.6.15. Paragraph 136 acknowledges that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. It also requires appropriate measures to be in place to secure the long-term maintenance of newly-planted trees and requires existing trees to be maintained wherever possible.

Section 14: Meeting the challenge of climate change, flooding and coastal change

- 4.6.16. According to paragraph 161 the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change
- 4.6.17. Paragraph 164 demonstrates that the new development should be planned for in ways that:
- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems; and
 - b) help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings in plans should reflect the Government’s policy for national technical standards.

Section 15: Conserving and enhancing the natural environment

- 4.6.18. Paragraph 187 illustrates planning policies and decisions should contribute to and enhance the natural and local environment by:
- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
 - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions

such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

4.6.19. Paragraph 199, to protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

4.6.20. **Planning Practice Guidance**

The proposed development will align with the principles set out in the Planning Practice Guidance (PPG), including:

- Effective use of land – Making efficient use of land to provide new homes.
- Community Infrastructure Levy (CIL) and infrastructure – will Support local services and infrastructure where required.
- Environmental considerations – Reviewing potential environmental impacts and avoiding harm.
- Climate change – Incorporating sustainable design, energy efficiency and flood risk management.
- Neighbourhood planning – Supporting the objectives of the local Neighbourhood Plan.
- Open space, sports and recreation facilities, public rights of way and local green space– Providing accessible green spaces for recreation, landscape and biodiversity.

4.7. **Supplementary Planning Guidance**

Healthy Environments Supplementary Planning Document (June 2024)

- 4.7.1. The Healthy Environments SPD provides guidance for the planning and design of new residential development (including mixed-use developments with an element of residential), streets, green infrastructure, schools, workplaces, community facilities, and/or new retail centres.
- 4.7.2. The guidance is used in the consideration of applications when assessing the design quality of proposed developments and their consistency with policies relating to this policy area.

Custom and Self-Build Housing Supplementary Planning Document (May 2024)

- 4.7.3. The Custom and Self-build Housing SPD provides guidance for the consideration of planning applications that include custom and self-build housing, primarily in relation to the following Local Plan policies:
- SCLP5.9 (Self Build and Custom Build Housing) of the Suffolk Coastal Local Plan¹ (adopted September 2020)

Affordable Housing Supplementary Planning Document (May 2022)

- 4.7.4. The overarching aim of the Affordable Housing SPD is to facilitate the delivery of affordable housing in accordance with the Local Plan policies. The aim of the guidance is to assist in the implementation of policies and will be a material consideration in determining applications for planning permission.

Sustainable Construction Supplementary Planning Document (April 2022)

- 4.7.5. This Sustainable Construction Supplementary Planning Document (SPD) provides guidance to assist in the interpretation and implementation of planning policies contained in the Council’s two Local Plans; the Suffolk Coastal Local Plan, adopted in September 2020, and the Waveney Local Plan, adopted in March 2019.
- 4.7.6. The SPD includes information about how sustainable construction methods and materials used in new development can reduce the construction and operational impact on our environment, wildlife, climate change and health and wellbeing. It also provides guidance on how the operating efficiency of existing buildings can be improved through retrofitting.
- 4.7.7. The document focuses on providing guidance on increasing energy efficiency, water efficiency, the use of sustainable materials, renewable and low carbon energy generation, reducing waste and carbon emissions, nature-based solutions for sustainable drainage systems, designing for future challenges, and designing homes and workplaces that support good health.

Historic Environment Supplementary Planning Document (June 2021)

- 4.7.8. The Historic Environment Supplementary Planning Document contains guidance on the implementation of policies detailed in the Local Plans and Neighbourhood Plans for East Suffolk regarding the historic environment and is a material consideration in determining applications for planning permission and listed building Consent. This SPD does not cover parts of East Suffolk that are within the Broads, for which the Broads Authority is the local planning authority.
- 4.7.9. The SPD provides important information and advice concerning the conservation and enhancement of the historic environment, in relation to any proposal potentially affecting the significance of a heritage asset. Although listed buildings and conservation areas carry special statutory protections, as detailed in the Legal Framework section below, registered and locally listed historic parks and gardens and other non-designated heritage assets also have heritage value worthy of protection.

Recreational Disturbance, Avoidance and Mitigation Strategy Supplementary Planning Document (May 2021)

- 4.7.10. The Recreational Disturbance, Avoidance and Mitigation Strategy Supplementary Planning Document, summarises the requirements of Suffolk Coast RAMS, including the per-dwelling tariff, and provides a framework for implementing those provisions. It includes information for developers and applicants to assist them in meeting the other requirements under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations).
- 4.7.11. The SPD provides information to support the implementation of policies set out in the Councils' Local Plans and is a material planning consideration in the development management process.

Cycling and Walking Strategy (October 2022)

- 4.7.12. The purpose of the East Suffolk Cycling and Walking Strategy is to create safe, coherent, direct, comfortable, and attractive cycling, walking and wheeling environments that lead to improvements in health and wellbeing, facilitate greater social interaction and play, encourage more environmentally sustainable lifestyles, reduce road congestion, and support economic growth. The Strategy identifies cycling and walking infrastructure recommendations across the East Suffolk district (including the Broads Authority Area), focusing on the identification of new and improved infrastructure rather than the maintenance of existing infrastructure. It also provides context and information to support detailed infrastructure proposals and inform plan and decision making to support cycling, walking, and equestrian use.

Play Area Strategy (December 2022)

- 4.7.13. The Play Strategy identifies all known forms of play provision and includes an assessment to the quality and value of all sites across East Suffolk regardless of ownership or management. This is used to help inform a number of priorities for sites based on the findings.

East Suffolk Leisure Strategy (November 2021)

- 4.7.14. The Leisure Strategy provides the planning related evidence base across East Suffolk and identifies a way to develop improved facilities for residents. It is informed by three initial strategies for open spaces, indoor sports facilities and play pitch.

Suffolk Design: Streets Guide (2022)

- 4.7.15. The purpose of the guide is to assist the delivery of well-designed places in line with the National Design Guide as well as the National Model Design Code, and as part of the Suffolk Design initiative, enabling a positive contribution to the spaces and places of Suffolk.
- 4.7.16. The design guide focuses on providing design guidance for streets, particularly for new residential developments, but also to inform works within existing streets where constraints are greater. In addition, it can also act as a reference for commercial developments and urban regeneration schemes. It reflects the National Design Guide's reference to a hierarchy of streets but, in the context to designing for all users and movement corridors, a vehicular route should not be considered more important than a cycle route.
- 4.7.17. This guidance includes best practice examples and illustrative layouts for different locations and scales of development.

Suffolk Guidance for Parking (2023)

- 4.7.18. The Suffolk Guidance for Parking (2023) has been prepared to support the aspirations expressed in the National Planning Policy Framework and provide the highest quality advice to planners, members of the public, developers and architects.
- 4.7.19. The guidance outlines that *“the guidance contained within this document is only one factor to be taken into account by Local Planning Authorities when judging planning applications. The issue of parking provisions will be considered alongside existing local policy and all other material planning considerations. It is a matter for the Local Planning Authorities to balance this guidance against all the other material considerations”*.

Suffolk Local Flood Risk Management Strategy (February 2023)

- 4.7.20. This Flood Risk Management Strategy has been prepared as part of SCC’s role as LLFA and is the result of a review of the first strategy, published in February 2013, (updated 2016) taking into account current national, regional and local policies, best practice, updated guidance and current priorities.
- 4.7.21. It provides a strategic framework within which the RMA’s in Suffolk can work in effective and co-ordinated ways to manage risk, improve resilience, and limit impacts caused by surface water runoff, groundwater and from watercourses.
- 4.7.22. The needs of communities, the economy and the environment are key factors in delivering sustainable growth in Suffolk. The development and delivery of the Suffolk Flood Risk Management Strategy (SFRMS) aim to support this

Suffolk Green Access Strategy, Rights of Way Improvement Plan (ROWIP) 2020-2030

- 4.7.23. The Green Access Strategy aims to identify changes that will “improve provision for walkers, cyclists, horse riders and those with mobility problems”. The plan is intended to last until 2030 but will be subject to periodic reviews to reflect new priorities and changing levels of investment.
- 4.7.24. The Strategy complement existing strategies including the Health and Wellbeing Strategy, the Sustainable Modes of Transport Strategy and the Growth Strategy and will seek out opportunities to work collaboratively with internal and external stakeholders to deliver shared outcomes effectively.

4.8. National Model Design Guide

- 4.8.1. The Government published the National Model Design Code (NMDC) in July 2021 which provides detailed guidance on the production of design codes, guides and policies to promote successful design.
- 4.8.2. The NMDC forms part of the government’s planning practice guidance and expands on the ten characteristics of good design set out in the National Design Guide, which reflects the government’s priorities and provides a common overarching framework for design.
- 4.8.3. The NMDC sets a baseline standard of quality and practice, which local planning authorities are expected to take into account when determining applications. This includes: the importance of streets being tree lined; and factors to be considered when determining whether ‘facades of buildings are sufficiently high quality’. It also suggests the place-making balance has now firmly shifted to appearance becoming one of the key factors in delivering well-designed places.

5. Planning Assessment

- 5.1.1. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 the determination of planning applications must be made in accordance with the adopted development plan, unless material considerations indicate otherwise.
- 5.1.2. This section sets out a planning assessment against the policies of the adopted development plan, as set out in section 4.

5.2. Principle of Development

Site Allocation Policy SCLP12.29

- 5.2.1. One of the primary objectives of the NPPF is to significantly boost the supply of homes. Paragraph 61 highlights that “it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay”.
- 5.2.2. Local planning authorities are charged with delivering a wide choice of high-quality homes and to significantly boost the supply of housing by identifying sites for development, maintaining a supply of deliverable sites and to generally consider housing applications in the context of the presumption in favour of sustainable development in accordance with NPPF.
- 5.2.3. The adopted East Suffolk Suffolk Coastal Local Plan (2020) aims to deliver at least 9,756 new homes and a supply of more 11.7ha of land for employment uses to deliver at least 6,500 jobs over the plan period. The strategy for growth is set out in Policy SCLP3.1 which outlines that to provide this requirement the Local Plan allocates housing and employment sites to meet the identified needs of the area. Part of the strategy is to deliver two new Garden Neighbourhoods at North Felixstowe and South Saxmundham.
- 5.2.4. The majority of the Site is allocated under Policy SCLP12.29 of the Suffolk Coastal Local Plan for up to 800 homes, education, employment, community use, walking and cycling infrastructure and green infrastructure. The land uses included in the Proposed Development are consistent with the uses outlined within the local plan allocation, with the exception of the roadside services proposed west of the A12.

Roadside Services

- 5.2.5. The roadside services proposed west of the A12 seek to provide additional uses in the garden neighbourhood which support the safety and wellbeing of road users, namely a petrol filling station, a hotel and eateries, which is a well established and widely recognised model that is delivered across the country.
- 5.2.6. National Highways Circular 01/2022 recognises the principal function of roadside services is “to support the safety and welfare of road users. Roadside facilities should be sympathetic to the character of the site and its surrounding area, and create a safe, inclusive and accessible environment. In most cases it is for the private sector to promote roadside facilities.....Roadside facilities perform an important safety function by providing opportunities for the travelling public to stop and take a break during their journey. Government advice is that motorists should stop and take a break of at least 15 minutes every 2 hours”. The following section outlines the principle of development for this collection of uses.
- 5.2.7. Policy SCLP3.1 (Strategy for Growth) identifies that the strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through (g) utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and A14 corridors.
- 5.2.8. Policy SCLP3.3 (Settlement Boundaries) stipulates that land which is outside of settlement boundaries, and which isn’t allocated for development in the Local Plan and Neighbourhood Plans is defined as Countryside. Within the countryside New residential, employment and town centre development will not be permitted in the Countryside except where specific policies in this Local Plan or Neighbourhood Plans indicate otherwise.
- 5.2.9. The petrol filling station (including some internal ancillary facilities) would not fall under any of these uses listed within Policy SCLP3.3 therefore the developed of a petrol filling station on the Site is not ruled out by local policy.
- 5.2.10. Furthermore, the Local Plan does not allocated land for roadside services or provide a strategy for meeting the needs of road users. The Suffolk County Council Local Transport Plan 2025 – 2040 and the Saxmundham and Leiston Area Transport Plan recognise the importance of delivering transport infrastructure, which roadside services are considered to contribute towards. Therefore, neither East Suffolk Council nor Suffolk County Council have established a strategic approach to delivering roadside services.
- 5.2.11. In addition to the policy vacuum at a local policy level, Paragraph 111 e) of Chapter 9 of the National Planning Policy Framework states that planning policies should ‘provide for any large-scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.’

- 5.2.12. Footnote 46 goes on to state that ‘Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services should be to support the safety and welfare of the road user”.
- 5.2.13. Paragraph 97 of the NPPF states that local planning authorities should refuse applications for hot food takeaways and fast-food outlets (a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre. However, due to the inclusion of the eateries within a recognised model for roadside services and the distance from places where children and young people congregate, it is not considered that the inclusion of this use within the Proposed Development will be contrary to paragraph 97 of the NPPF.
- 5.2.14. Th eateries proposed within the roadside service area would be beyond the 400m walking distance considered by the London Plan to be a reasonable walking distance when measured from the entrances to primary or secondary schools. The proposed new primary school and community hub is located circa 600m from the location for the proposed eateries.
- 5.2.15. In addition to the distance from the proposed primary school, an additional walking and cycling route across the northern arm of the proposed new roundabout to align with the employment site would seek to take desire lines away from the roadside services which would be principally accessed via the highway network.
- 5.2.16. Paragraph 91 of the NPPF outlines that “*local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan*”. The proposed hotel within the roadside services area falls within a main town centre use in accordance the Framework.
- 5.2.17. Paragraph 91 goes on to state that “*Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered*”.
- 5.2.18. The East Suffolk Council Brownfield Land Register (December 2025) identifies no brownfield land that is currently vacant and available within the Saxmundham town centre boundary, and the Strategic Housing and Economic Land Availability Assessment 2018 does not identify land of a sufficient size that is available to accommodate a new hotel use.

- 5.2.19. Furthermore, Policy SCLP6.5 (Tourist Accommodation) states that proposals for new tourist accommodation will be accepted:
- *“On medium and large-scale sites where commercial, recreational or entertainment facilities are provided on site; or*
 - *Where such development forms part of a comprehensive masterplan which supports wider landscape and ecological gain“*
- 5.2.20. Finally, National Highways Circular 01/2022 states that National highways ‘*will not object to the provision of hotels, conference centres or business centres at the site of roadside facilities where the impacts on safety and network capacity would be acceptable*’. The primary purpose of the tourist accommodation development is to provide road users with improved access to hotel facilities on the primary road network to support the safety and welfare of motorists.
- 5.2.21. Therefore, the proposal for roadside services is considered to be acceptable in this location.

Social

- 5.2.22. The Proposed Development will result in the delivery of a significant number of new residential dwellings being provided, including the provision of 1 in 3 dwellings being affordable homes.
- 5.2.23. The provision of a range of dwelling types, and tenures will meet the needs of different occupiers and will assist in creating a strong and balanced community. Provision will be made for 50% of dwellings to comply with the M4(2) standard to ensure that they are accessible and adaptable for older people, to meet the needs of an aging population.
- 5.2.24. The development of the Site will introduce new residents to the local area and expand to local community. To provide community services and facilities to support the growing community the Proposed Development will deliver a new community hub with an associated green space alongside a new primary school and pre-school to serve the new and existing community.
- 5.2.25. The Proposed Development will deliver a significant amount of new open space (49% of the Site) throughout the Site, including a new green space at the heart of the development which incorporates seating and a play area to encourage social interaction and recreational activities.

5.2.26. In addition to significant areas of open space the Proposed Development will also provide walking and cycling routes which will link to the new SANG areas in the northwest, south and east of the Site. These will be connected through generous green infrastructure corridors that seek to provide an immersive experience for new and existing residents to access key facilities and the existing town.

Economic

5.2.27. The Proposed Development will make a contribute to the requirement to deliver 11.7ha of employment land and 6,500 jobs over the plan period through the delivery of a key employment allocation that offers a range of employment opportunities west of the A12.

5.2.28. The increase to the local population as a result of the Proposed Development should provide additional footfall for businesses in the town centre and help to increase the skills within the local labour market.

5.2.29. In addition to the employment provision specified in the Local Plan allocation the Proposed Development will also bring forward new roadside services along the A12 with additional employment opportunities relating to the petrol filling station, eateries and hotel.

5.2.30. The Proposed Development will contribute to the economic growth of the area both during construction and over the lifetime of the development. Construction of the development will support jobs directly on the Site as well as indirect support, adding additional jobs in the supply chain.

5.2.31. Finally, the development will be liable for the Council's Community Infrastructure Levy from which the funds generated will be spent on Council services. The development is also subject to S106 financial contributions which will directly contribute to infrastructure works associated with the development of the Site. S106 contributions will be agreed with ESC during the determination of this Outline Planning Application.

Environmental

5.2.32. Policy SCLP10.1 of the Suffolk Coastal Local Plan seeks to ensure that features of biodiversity and geodiversity are maintained, enhanced or improved by development proposals. The Proposed Development seeks to retain the existing biodiversity features on the Site and incorporate them in the green infrastructure network and SANG strategy.

- 5.2.33. The existing hedgerow and hedgerow tree network, which forms the boundary to the existing field structure, has been incorporated into an extensive green corridor which provides the primary walking and cycling route through the development to access the employment opportunities to the west and the existing town of Saxmundham to the north east.
- 5.2.34. The Proposed Development seeks to deliver three separate and defined areas of Suitable Alternative Natural Greenspace (SANG) in order to mitigate the impact of the development on designated sites within the East Suffolk Area, in compliance with the Sandlings, Alde-Ore and Minsmere, Walberswick Recreation Avoidance and Mitigation Strategy (RAMS).

5.3. Housing Statement

- 5.3.1. The NPPF supports the provision of affordable housing and Paragraph 66 states “Where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs”.
- 5.3.2. The Suffolk Coastal Local Plan requires 1 in 3 dwellings to be affordable units on the schemes of more than 10 units. With 50% of those to be affordable rent, 25% for shared ownership and 25% should be discounted home ownership.
- 5.3.3. The Applicant is committed, unless otherwise advised by Officers during the application, to deliver 1 in 3 dwellings as affordable housing in line with Policy SCLP5.10 to help meet the identified need.
- 5.3.4. The Applicant also intends to deliver a mix of housing types that includes 50% 1-bed and 2-bedroom properties, in line with the requirements of Policy SCLP5.8, which states that there is an identified need for focus on smaller dwellings (1 and 2 bedrooms).
- 5.3.5. The exact mix of affordable units would be confirmed at detailed design stage. However, as required by the policies identified above, this will comprise a mix of unit types and sizes, including houses and apartments. The affordable dwellings will be located across the site in small groups or clusters and indistinguishable from the private dwellings.
- 5.3.6. The Applicant is applying for permission for approximately 800 homes on the Site. The indicative housing is shown below:

Table 1. Indicative housing mix

Unit Type	No.	%
1 Bed	173	22%
2 Bed	230	28%
3 Bed	295	36%
4+ Bed	102	14%
Total	800	100%

5.3.7. In line with the requirements of Policy SCLP5.9, the Proposed Development will provide circa 5% of dwellings as self-build and custom-build plots. These will be fully serviced and delivered in one part of the Site, as shown on the Land Use Parameter Plan.

5.3.8. The Proposed Development is therefore compliant with the relevant local plan policies including policies SCLP5.8, SCLP5.9 and SCLP5.10 of the Suffolk Coastal Local Plan.

5.4. Design

5.4.1. Paragraph 131 - 141 of the NPPF acknowledges that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

5.4.2. Paragraph 135 outlines that planning decisions should ensure that developments function well and add to the overall quality of the area over the lifetime of the development. They should be visually attractive as a result of good layout and appropriate and effective landscaping. Furthermore, they should be sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

5.4.3. At the local level, the Suffolk Coastal Local Plan Policy SCLP11.1 (Design Quality) states that the Council will support 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.

5.5. Flood Risk and Drainage

- 5.5.1. Section 14 of the NPPF sets out the challenges for meeting climate change, including for planning and flood risk. It includes the application of a sequential risk-based approach to the location of development, taking into account all sources of flood risk, and the current, and future impacts of climate change, in order to avoid where possible flood risk to people and property.
- 5.5.2. At the local level, the Suffolk Coastal Local Plan Policy SCLP9.5 (Flood Risk) requires development to exhibit the three main principles of flood risk and Policy SCLP9.6 (Sustainable Drainage Systems) requires development of more than ten dwellings to utilise sustainable drainage systems. More detailed guidance in respect of standards and requirements for new developments is contained within Suffolk County Council Guidance on development and flood risk.
- 5.5.3. A Flood Risk Assessment (FRA) prepared by Transport Planning Associates (TPA) has been submitted with this application as the Site is larger than 1ha in size.
- 5.5.4. The Site is within Flood Zone 1 and is therefore at a low risk of flooding. Overall, the remaining sources of flooding are low, therefore the Site is at low risk of flooding from other sources.
- 5.5.5. In accordance with paragraph 175 of the NPPF and PPG the assessment demonstrates that no built development (including access, escape routes and other vulnerable elements) will be located on higher areas of flood risk from any source.
- 5.5.6. The ground investigation and additional infiltration testing undertaken within the Site, demonstrated that the underlying geological bedrock within the Site has capacity for groundwater storage within certain areas of the Site. Additionally, there is an existing field ditch network within the Site that seem to be tributaries of the River Fromus. Therefore, the preferred method within the hierarchy of the surface water disposal is a combined hybrid solution based on localised infiltration where possible, and attenuation and discharge within the nearest ditch at a maximum Q1in1 Greenfield runoff rate.
- 5.5.7. It is proposed that the surface water drainage runoff arising from the development will be accommodated within SuDS such as rain gardens, lined permeable paving, tree pits, swales and attenuation basins, which in addition to provide attenuation will also provide conveyance and effective treatment prior to being discharged into the existing watercourse located to the south of the Site.
- 5.5.8. The drainage strategy for the Proposed Development is detailed in section 5 of the Flood Risk Assessment.

- 5.5.9. The Site is at a low risk of flooding and the drainage strategy for the Proposed Development demonstrates that surface water can be managed adequately across the Site. Therefore, the Proposed Development is considered to be compliant with Local Plan policies SCLP9.5 and SCLP9.6.

5.6. Highways and Access

Highways Impact

- 5.6.1. Section 9 the NPPF seek to promote sustainable transport and at Paragraph 110 indicates 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. Paragraph 116 indicates that development should only be prevented or refused on highway grounds where there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.6.2. The potential impacts of the Proposed Development on transport and access are presented in the Transport chapter of the Environmental Statement (ES), which is based off the Transport Assessment (TA) submitted with the planning application.
- 5.6.3. Forecast trip generation indicates that the level of traffic associated with the development remains within a range that can be accommodated on the surrounding network. Distribution assessments and proportional impact analysis confirm that increases in vehicle flows are modest across most links. Full junction modelling will be submitted separately once SCTM turning count data is provided.
- 5.6.4. Saxmundham benefits from a good range of transport choices, with regular bus and rail services, footways, and carriageways that are conducive with walking and cycling. The local highway network operates safely, with no recorded fatal collisions in the most recent five-year period, and where clusters of slight or serious accidents exist, these are either already being addressed through committed improvements or are not expected to be exacerbated by the development. The proposed A12 roundabout access, combined with a reduced speed environment and new controlled crossing facilities, will provide a safe and appropriate means of access for all modes.
- 5.6.5. The development responds directly to these requirements by delivering new walking and cycling routes, upgrading Public Rights of Way, establishing a mobility hub to support sustainable transport, and ensuring strong connectivity to Saxmundham town centre and railway station.

- 5.6.6. The assessment demonstrates that the proposals conform to national and local transport policy, including the National Planning Policy Framework, the Draft NPPF, the Suffolk Coastal Local Plan and the Saxmundham Neighbourhood Plan. All emphasise sustainable development, well-connected new communities and high-quality active travel provision.

Access

- 5.6.7. The access strategy for the Proposed Development is outlined in the Transport Assessment submitted with the planning application and the proposed access roundabout design is presented in drawing 2308-007.PL02(A).
- 5.6.8. Access is proposed to be taken from a central roundabout situated along the A12. This will facilitate movement to the residential element of the scheme to the east of the A12, and the employment side of the development to the west of the A12.
- 5.6.9. Previous discussions with SCC included thoughts and comments around the size and positioning of the proposed site access roundabout, including how it could be constructed to minimise delays to existing road users. SCC preference was for an “off-line” design with TPA and Pigeon favouring an “on-line” solution, due to being able to provide a more design compliant solution and impact on the extent of developable land to accord with the local plan site allocation.
- 5.6.10. Initial thoughts to address these concerns included increasing the size, inscribed circle diameter (“ICD”), of the roundabout from 55m to 65m, allowing enough space to construct the roundabout in stages and allow traffic flows to be managed alongside construction.
- 5.6.11. The roundabout includes a signal-controlled toucan crossing on the northern A12 arm, linking the employment and residential elements of the scheme. Uncontrolled crossings, featuring dropped kerbs and tactile paving, links either side of the eastern and western arms, to provide access to the signalised crossing to the north.
- 5.6.12. Further mitigation to implement the access roundabout and associated crossing facilities includes a gateway feature, a speed reduction on the A12 to reduce the speed limit on to 40mph. Reduced vehicle speeds along the A12 should also enhance the environment for elements of the Proposed Development located closest to the A12.

5.6.13. Whilst the proposal features a main single point of access, considerations have been given to the design and access of emergency vehicles from the A12. As shown in drawing 2308-007.PL15, the primary access road is proposed to be 9.3m wide with a 2m central overrun area. This ensures that in the unlikely event of an emergency in the Site and a blockage of the carriageway, emergency service vehicles still have space to manoeuvre into and out of the proposed development. This is supported with the creation of an internal loop system which provides alternative routing for emergency vehicles.

5.7. Ecology

5.7.1. Paragraph 193 of the NPPF indicates that when applications are being determined local planning authorities should support development whose primary objective is to conserve or enhance biodiversity. This should include opportunities to integrate biodiversity as part of design especially where this can secure net gains or enhance public access to nature where appropriate.

5.7.2. At a local level, Policy SCLP10.1 (Biodiversity and Geodiversity) of the Suffolk Coastal Local Plan supports development where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat 'stepping stones'.

5.7.3. The assessment of the potential effects of the Proposed Development on Ecology and Biodiversity is presented in the Ecological Impact Assessment. The assessment has been informed by a comprehensive set of ecological surveys that have been undertaken at the Site to provide baseline information.

5.7.4. Due to the Site's proximity to the Alde-Ore Estuary SPA; Alde-Ore Estuary Ramsar Site; and the Alde-Ore Estuary SAC, Sandlings SPA, Minsmere – Walberswick SPA; Minsmere – Walberswick Ramsar Site, Minsmere to Walberswick Heaths and Marshes SAC and Orfordness-Shingle Street SAC a detailed assessment of the potential impacts of the Proposed Development on the SAC and the suggested mitigation is set out in the shadow Habitats Regulations Assessment (HRA). The shadow HRA confirms that the mitigation proposed will ensure that there is no adverse impact on protected sites and therefore the requirements of the Habitats Regulations are complied with.

5.7.5. A Biodiversity Net Gain Calculation has also been prepared and submitted with the application in line with the requirements set out in the Environmental Act 2021. The Biodiversity Net Gain Calculation has been conducted using the DEFRA Biodiversity Metric v4.0 and has been informed by the Green Infrastructure Plan.

Designations

- 5.7.6. Within 5km there are two sites with international / European designations, with these two sites having a total of four designations. These are too distant for pathways of direct impact to be relevant, although there may be impacts from recreational disturbance. These can be mitigated via on-site greenspace and the connection of the Site to an existing network of footpath across nearby farmland. With this mitigation it is concluded that there will not be an impact on site integrity.
- 5.7.7. The shadow HRA has concluded that there shall be no impacts on designated sites due to the SANG provision being provided by the Proposed Development.
- 5.7.8. There is also a single site with statutory national designation within 5km of the Site, namely Gromford Meadow Site of Special Scientific Interest, at a 2.9km distance. There are two County Wildlife Sites within 1km and another 22 within 5km. It is not anticipated that there will be impacts on these, by virtue of distance and limited public access.
- 5.7.9. The Site is located within Impact Risk Zones (IRZs) for SSSIs in a general southeast and western direction beyond that of Gromford Meadow SSSI. It is considered too far for direct impacts to be relevant, and it lacks public access, therefore recreational impacts are unlikely. Impacts of the scheme will therefore be negligible.

Habitats

- 5.7.10. The habitats on Site comprise arable fields, boundary hedgerows (including hedgerows with standard trees), grass verges of modified sward, three on-Site ponds, a short length of wet ditch, small patches of scrub and three blocks of deciduous woodland.
- 5.7.11. The hedgerows and woodland qualify as the equivalent Habitats of Principal Importance: Hedgerow and Lowland Mixed Deciduous Woodland. The total length of hedgerow is estimated as 6.7km, of which 2.7km are thought likely to qualify as Important Hedgerows under the Hedgerow Regulations. The three woodland blocks are not ancient, but they are marked on the OS maps from the 1880s.
- 5.7.12. Direct surveys for great crested newts using E-DNA sampling were negative, and direct reptile surveys were also negative.
- 5.7.13. The hedgerows and mature hedgerow standards are considered to be of value at the District level, given their large character and veteran characters of many trees.

- 5.7.14. Most other habitats are of local value, although the arable and arable flora of value at the Site scale. The three blocks of priority habitat woodland are of Local value, based on their relatively small size and absence of key features such as an abundance of deadwood.
- 5.7.15. Soft landscaping and new habitat creation will be a significant benefit of the scheme, to maximise potential gains and also deliver Biodiversity Net Gain. The focus of the enhancements are on-Site, where a long-term security is available within the areas of new landscaping and also within the wider development area. In qualitative terms the main features of the landscaping proposals are:
- Inclusion of street trees within the development area, as a mix of cultivars of native species and non-natives.
 - Blocks of public open space with structural planting of native trees and shrubs with longer sward wildflower areas as well as some short sward amenity areas.
 - Areas of SANG, to include existing woodland, and also reversion of arable to grassland and scrub – woodland mosaic and a creation of a wildflower meadow.
- 5.7.16. Key requirements for the landscaping is for the use of appropriate native species and species of known wildlife value within public areas and, as far as possible, within the landscaping scheme for the built development area. Key points are that:
- For many species groups, the need for insect prey is vital, for bats and also for the chicks and fledgling birds of many species such as house sparrows. A range of plant types should be planted to provide a range of resources across the seasons from spring (insect prey) to autumn and winter (fruit and berry producing species).
 - The widespread declining moths are associated with a wide range of native shrubs and herbs. A diversity of native planting as part of the scheme's landscaping will probably increase the extent of available habitat.
 - For areas of grassland a number of wildflower seed mixes are available from commercial suppliers. It is likely that the most appropriate mixes will be those for light soils able to create conditions of open grassland with acid sward characteristics. The attenuation features should include appropriate wetland planting and, if possible, contain permanent open water with suitable wetland and aquatic planting.

5.7.17. The scheme is for mixed commercial and residential with two blocks of Suitable Alternative Natural Greenspace to be created via arable reversion. The layout intends to minimise hedgerow losses, but breaches will be required for access, affecting the following:

- West Parcel – hedgerow H3 (Important Hedgerow) and H9.
- Central Parcel – hedgerows H3, H16 (Important Hedgerow) H17 (Important Hedgerow), H17, H20 and H22.
- East Parcel – none.

5.7.18. The SANG and other habitat creation measures and enhancements will benefit all of the species present or scoped in. A few species of bird are likely to avoid nesting in such new habitat due to disturbance and proximity of development, but these would nevertheless benefit from the new foraging habitat while nesting elsewhere in spring and summer, and use these areas more extensively in winter. The benefits are potentially at the local population levels. The residual benefits of the scheme are therefore assessed as positive for all features and species groups.

Species

5.7.19. The animals present or scoped in are:

- Bats, with a small assemblage of six species recorded by direct surveys. Many hedgerow and also woodland trees have potential roost features.
- Birds, based on an assemblage of typical farmland species but lacking several scarcer and uncommon species that might be expected
- Badgers, with small on-Site sett.
- Hedgehogs
- Invertebrates of dead woodland and widespread moths of semi-natural vegetation.

5.7.20. Species specific mitigation that has been recommended in addition to the habitat mitigation consists of:

- Bat boxes to be erected on the larger boundary hedgerow trees and also, if possible, on buildings around the periphery of the scheme. A wide range of types are available²² and these should be erected as high as possible as a small group of boxes facing different directions.
- Bird boxes would be relevant to a number of species potentially present locally, including swifts, and house sparrows.
- The scheme should allow for the continued movements of hedgehogs, with garden gates raised to allow them to pass under and holes within gravel boards to allow them to pass through²³.

- Felled timber should be retained to create additional habitat in understorey areas of existing hedgerows and soft landscaping. These would be of value to a range of species groups, including invertebrates and hedgehogs.

5.7.21. Construction phase mitigation will be provided as required to ensure legal compliance and animal welfare, to include:

- Nesting birds - The clearance of woody vegetation should be outside of the nesting bird season (March to August inclusive) or otherwise under a watching brief. It is acceptable to clear such vegetation in advance of main works to deter nesting.
- Badgers - Establishing a buffer zone of at least 30m around the badger sett to avoid direct damage and general disturbance, e.g. via ground vibration.

Biodiversity Net Gain

5.7.22. The application is supported by a Biodiversity Net Gain Statement, which has been prepared by Hopkins Ecology Ltd. The assumptions and BNG baseline are outlined within report along with a breakdown of the post-development habitats.

5.7.23. Overall, the development achieves a 25.07% net gain for habitat units and a 22.97% net gain in hedgerow units as shown in tables 2 and 3 below.

Table 2. BNG calculations for the combined development - area habitats

Block	Baseline Habitat Units	Post intervention	Change in habitat units (%)
West (commercial)	35.20	39.93	+4.73(+13.44%)
East (Residential and three SANG areas)	118.72	152.57	+33.85 (28.52%)
Combined	153.92	189.5	+38.58(+25.07%)

Table 3. BNG calculations for the combined development - hedgerows

Block	Baseline Hedge Units	Post intervention	Change in hedgerow units (%)
West (commercial)	31.19	36.56	+5.37 (+17.22%)
East (Residential and three SANG areas)	31.42	40.43	+9.01 (+28.68%)
Combined	62.61	76.99	+14.38 (+22.97%)

5.8. Arboriculture

- 5.8.1. A Tree Survey has been undertaken and is submitted with the application, along with a Tree Constraints Plans (TCPs) and an Arboricultural Impact Assessment (AIA).
- 5.8.2. The AIA assesses the impact on trees and hedgerows from the Proposed Development. The layout has sought to retain trees and hedgerows as much as possible but, as identified in the AIA, there would be a need for some limited tree removal and hedgerow removal across the Site in order to enable the construction of the site access and internal access tracks, as set out in the table below (to be read alongside the Tree Survey, AIA and TPPs).
- 5.8.3. The magnitude of hedge loss is low as the trees within the hedges are mostly obscured from wider views (C1 category with three category B). The scale of tree loss is such that the character and function of the hedges will not be affected. The overall impact of tree loss is negligible as the trees being removed are of limited value or life expectancy. The hedgerow and tree loss will not be readily visible from outside the Site and visual amenities will not be adversely affected. Any impacts of views from PRoW that traverse the Site will be negligible.
- 5.8.4. Overall, it is considered that the retention of trees and hedgerows on the Site that the Proposed Development is in compliance with policy SCLP10.1 of the East Suffolk Suffolk Coastal Local Plan.

5.9. Landscape and Visual

- 5.9.1. Policy SCLP10.4 requires proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence.
- 5.9.2. The potential landscape and visual impacts of the Proposed Development are presented in the Landscape and Visual chapter of the Environmental Statement (ES). This assessment is based off an LVIA which has been prepared by Liz Lake Associates and assessed the impacts of the Proposed Development in relation to the likely significant environmental effects it would have on the landscape resource, specific views and visual amenity.
- 5.9.3. A Landscape Strategy Plan (2174A3-LLA-ZZ-ZZ-DR-L-0001 P02), prepared by Liz Lake Associates, shows how the Site can be developed to accommodate the Proposed Development which respects the wider landscape character and views and visual amenity from receptors within the study area.

- 5.9.4. The assessment concludes that the Proposed Development would result in a localised loss of arable land, however, the majority of structural vegetation would be retained and protected throughout the construction period. Vegetation losses occur where access is facilitated.
- 5.9.5. The Proposed Development will introduce new areas of trees, woodland, structural planting and meadow grassland, along with the creation of new ponding and basins. Overall, the scale and degree of change on the landscape would be recognised since the Site currently forms partially enclosed arable land, however, the Site is heavily influenced by the A12 and East Suffolk Railway Line, both of which sever the site.

5.10. Open Space

- 5.10.1. The Healthy Environments Supplementary SPD provides guidance for the planning and design of new residential development (including mixed-use developments with an element of residential) including green infrastructure.
- 5.10.2. The purpose of providing the supplementary planning guidance is to support the delivery of the visions and policies in the Suffolk Coastal Local Plan that relate to the achievement of healthier, more cohesive, active and enabled communities in East Suffolk over the plan period to 2036 (including Policy SCLP8.2).
- 5.10.3. The guidance will be used in the consideration of applications when assessing the design quality of proposed developments and their consistency with policies relating to this policy area.
- 5.10.4. The Healthy Environments SPD sets out the Open Space Methodology which should be used to determine quantity and type requirements for new residential developments in East Suffolk.
- 5.10.5. Table 9 of the SPD sets out quantity rates for provision of green open space in East Suffolk by type. The SPD identifies an average occupancy rate figure of 2.4 people per household across the East Suffolk District. A development of 800 dwellings would therefore be expected to have a population of 1,920.
- 5.10.6. The SPD notes that as SANGs are usually of significant scale, it is recommended that requirements for SANG are planned and designed in before the other forms of green infrastructure on the site (i.e. open space, green routes, SuDS, landscaping, etc.).
- 5.10.7. The quantity guidance figure for the provision of SANG that the Council expects is around 8 hectares of SANG per 1,000 people, which should be calculated based on an occupancy rate of 2.4 people per home.

5.10.8. SANG provision replaces the requirement for natural and semi-natural green spaces within the Open Space Methodology, as the SANG will be expected to meet the new community’s needs for this typology on site.

5.10.9. For a development of 800 dwellings with an estimated population of 1.920 the open space requirements would therefore be:

Table 4. Open space assessment - minimum requirements and Proposed Development provision

Open Space Typology	Minimum Open Space Requirement (ha)	South Saxmundham Garden Neighbourhood Provision (ha)
Parks and Gardens	0.42	0.47
SANG (replacing natural and semi-natural green space requirements)	15.36	15.55
Amenity Green Space	1.77	11.07
Allotments	0.5	0.5
Total	18.05 ha	27.59 ha

5.10.10. The provision of each open space typology is shown on the Green Infrastructure Parameter Plan (PP-GI-03).

5.10.11. The Proposed Development is therefore considered to be compliant with Policy SCLP8.2 and Policy SCLP 8.3 of the Suffolk Coastal Local Plan.

5.11. Public Rights of Way

5.11.1. An Active Travel Audit and Active Travel Strategy has been prepared by Transport Planning Associates (TPA) in support of this Outline Planning Application.

5.11.2. The Green Infrastructure Parameter Plan includes the diversion and upgrade and enhancement of existing PRoW across and beyond the Site. The proposals for upgrades and enhancements to the PRoW network both onsite and offsite is contained in the table below.

Table 5. Public Right of Way Schedule

Definitive Map Ref.	Type	Surface	Routing	Width	Status	Affected by development
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FP15	Footpath	Dirt path	Runs east - west from the footbridge then tracks north-south alongside the former Saxmundham Free School site until Rendham Road	1m	Open	Yes - footpath to be widened to 3m and resurfaced to include a new shared surface to allow cyclist and pedestrians usage.
FP16	Footpath	Dirt path	Routed southwest to north-west across The Layers, connecting the B1121 to the railway FP21.	1.5m	Open	Yes - to be widened to 3m and resurfaced to allow it to be used by pedestrians and cyclists.
FP17	Footpath	Dirt path and footbridge	Tracks east to west from FP16/21 across the railways bridge and ends at FP18.	1.5m	Open	Yes - surface to be upgraded and widened to 3m to be used by pedestrians, cyclists and horse riders (in the event that the Kiln Lane crossing is closed).
FP18	Footpath	Dirt path	Tracks northeast to southwest across a field ending at FP21.	1m	Open	Yes - converted to a cycle path to be used by both pedestrians and cyclists and permanently diverted to align with the field boundary to the west, ending at FP15.
FP19	Footpath	Dirt path	Tracks north-south along the western boundary of the site west of the A12 and continues past the northern boundary to Hill House Farm, terminating and Deadman's Lane.	1m	Open	Yes - to be upgraded to provide more a suitable walking route along the western boundary of the development.
FP20	Footpath	Dirt path	Tracks south east to north west across The Layers connecting the B1121 to FP21.	1m	Open	No

FP21	Footpath	Dirt path	Tracks south west to north east through the centre of the proposed residential development.	1m	Open	Yes - will be converted to a cycleway, widened to 5m (2m footpath, 3m cycle path) and resurfaced.
FP21 (SANG)	Footpath					
FP22	Footpath	Dirt path	<p>East of the railway - Tracks north south within the land parcel east of the railway.</p> <p>West of the railway - Tracks south west to northeast from the A12 to FP21.</p> <p>West of the A12 - tracks approximately east west from the A12 to Deadman's Lane</p>	1.5m	Open	<p>East of railway - No - there will be no surfacing or diversion for this PRow. It will be maintained in it's current form within the newly created SANG.</p> <p>West of the railway - Yes - upgraded to cycle track</p> <p>West of the A12 - Yes - upgraded to a cycle track up to confluence with FP19 after that no upgrades proposed.</p>
FP23	Footpath	Dirt path	Tracks southwest to north east outside of the site boundary, to the west of FP19.	1m	Open	No
FP23A	Footpath	Dirt path	Tracks north south from footpath 22 to BR25.	1m	Open	No
FP24	Footpath	Dirt Path	Tracks approximately north south from Kiln Lane to B1121, adjacent Minsmere Cottage	1m	Open	No
BR25	Bridleway	Dirt path	Tracks approximately east west along a field boundary and links the A12 to Deadman's Lane	1m	Open	No

5.11.3. The Proposed Development is therefore considered to be compliant with the Policy SCLP7.1 Sustainable Transport of the Suffolk Coastal Local Plan.

5.12. Built Heritage and Archaeology

5.12.1. An Heritage Impact Assessment has been prepared by Dr Richard Hoggett in support of this application to meet the requirements of the NPPF and Policy SCLP11.3 (Historic Environment), Policy SCLP11.4 (Listed Buildings), Policy SCLP1.6 (Non-Designated Heritage Assets) and Policy SCLP11.7 (Archaeology) of the East Suffolk Suffolk Coastal Local Plan.

5.12.2. Paragraph 207 of the NPPF requires local planning authorities when determining application to require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Built Heritage

5.12.3. There are no designated heritage assets within the application Site and the Proposed Development will have no direct impact upon any designated heritage assets or their settings. Similarly, those non-designated heritage assets which have been identified, including the site of the former brick works, are considered to be of low significance.

5.12.4. The north-eastern corner of the application Site and the south-western extent of the Saxmundham Conservation Area lie in close proximity. However, this short distance is severed by the line of the railway cutting and extant track, which create a clear separation between the landscape to its east and west. This separation has existed since the mid-19th century and within the townscape to the north there is a distinct division between the historic core to the east of the railway line and the modern developments to its west. This existing severance is preserved and enhanced in the submitted proposals for the Site, with all of the land to the east of the railway line being proposed for SANG. Likewise, the land at the north-eastern corner of the Site, which lies closest to the Conservation Area boundary, is also proposed to be open space, pulling residential development back from its immediate setting and creating an additional green buffer within the Site.

- 5.12.5. It is concluded that the Proposed Development would have no impact upon the setting of the Saxmundham Conservation Area or its significance. Similarly, development within the application area would not have an impact upon the setting of any of the individual Listed Buildings within the Conservation Area, as these are separated from the Site by some considerable distance and a sizeable intervening body of more recent development.
- 5.12.6. The adopted design approach accords with the conclusions of the Council's South Saxmundham Garden Neighbourhood Heritage Impact Assessment (Edleston 2018), which recommends that built development should not occur to the east of the railway line.

Archaeology

- 5.12.7. It is acknowledged that there is still the potential for archaeological features to lie buried within the study area, although in the light of the geophysical surveys undertaken by the applicant this likelihood is considered to be very low. It has been agreed with Suffolk County Council Archaeological Service that a post-determination programme of archaeological trial-trench evaluation will be undertaken across the Site and that this will be secured by conditions placed on any consent granted. Decisions on the need for any further mitigation will be informed by the results of the evaluation.
- 5.12.8. Overall, the potential impact of any development within the study area on any known designated or non-designated heritage assets is considered to be low. In the light of the assessment presented here and the recently completed geophysical surveys the potential for the discovery of unknown heritage assets within the study area is also thought to be very low.
- 5.12.9. The Proposed Development would therefore be considered to be compliant with the Policy SCLP11.3 (Historic Environment), Policy SCLP11.4 (Listed Buildings), Policy SCLP1.6 (Non-Designated Heritage Assets) and Policy SCLP11.7 (Archaeology) of the East Suffolk Suffolk Coastal Local Plan.

5.13. Ground Conditions

- 5.13.1. In accordance with Paragraph 189 of the NPPF it is necessary to ensure that the Site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. The East Suffolk Suffolk Coastal Local Plan Policy SCLP10.3 (Environmental Quality) expects development proposals to protect the quality of the environment and minimise and reduce all forms of pollution and contamination.

- 5.13.2. This application is supported by a Phase 1 Desk Study and Preliminary Risk Assessment which has been prepared by Geosphere Environmental Ltd to Provide an assessment of environmental sensitivity at the Site and the surrounding area in relation to any suspected or known contamination which may significantly affect the Site and the proposed development, and indicate whether further works are required, and the nature of the works, to enable a more complete assessment of the Site.
- 5.13.3. The preliminary risk assessment has identified the following potential sources of contamination which may pose a risk to sensitive receptors. These have been assessed as posing the following risks:
- Onsite: Historical ponds and backfilled pits within associated land parcels.
 - Onsite: Made Ground associated with removal of structures of Park Farm
 - Cottages, former Haward's Farm, Benhall Brick Works, Kiln Farm and small structure within land parcel P2.
 - Offsite: Historical development and operation of the A12 Carriageway.
 - Offsite: Operation of the railway line traversing the Site since the earliest historical maps.

- 5.13.4. It is recommended that preliminary intrusive ground investigations are undertaken within each land parcel, with the exception of Park Farm Covert where this has remained woodland throughout the historical period, to determine the extent of any potential contamination within the soil strata, targeting those features outlined within the Preliminary Conceptual Site Model for the respective land parcels.
- 5.13.5. It is considered appropriate that preliminary intrusive ground investigations can be secured through planning condition and therefore there is no constraint to the grant of planning permission.
- 5.13.6. Therefore, the Proposed Development is compliant with the requirements of Policy SCLP10.3 (Environmental Quality) of the East Suffolk Suffolk Coastal Local Plan.

5.14. Noise and Vibration

- 5.14.1. A Noise Appraisal Statement has been prepared by Professional Consult Limited and submitted with this application in order to comply with East Suffolk Suffolk Coastal Local Plan Policy SCLP10.3 (Environmental Quality) which expects development proposals to protect the quality of the environment and minimise and reduce all forms of pollution and contamination.
- 5.14.2. The Noise Appraisal has concluded that noise-sensitive residential development may experience adverse noise impacts due to road traffic noise associated with vehicles using the A12, the B1121 and the railway line. The residential development may also experience adverse vibration impacts due to rail traffic movement on the Saxmundham to Wickham Market railway line.
- 5.14.3. The noise-generating commercial development may give rise to adverse noise impacts which may impact upon the closest existing residential dwellings located at Home Farm to the west of the potential commercial area and at the residential dwellings to the north at Franklin Rd.
- 5.14.4. The assessment has shown that the proposed residential development parcels on the Site are classed as 'high' risk close to the A12 and 'low' risk towards the railway line and following good acoustic design with gardens facing away from the A12 and with low-level acoustic fences where required, garden areas will fall below 55dB LAeq,16hr and will be classed as 'low risk'.
- 5.14.5. The assessment has included an example indicative layout for proposed residential dwellings in close proximity to the A12 and shows that noise levels in garden areas facing away from the A12 do not exceed 55dB LAeq,16hr.

- 5.14.6. The assessment has shown that, where dwellings are located close to the A12, upgraded glazing and a scheme of alternative ventilation will be required in order for internal noise levels not to exceed the noise criteria levels.
- 5.14.7. It is concluded that the measured vibration levels close to the railway line do not exceed the low probability of adverse comment criteria.
- 5.14.8. A set of mechanical and electrical plant noise emission limits for the proposed commercial area to the west of the A12 have been set by the assessment and the noise emission limits are for the closest existing or proposed residential dwellings and should not be exceeded.
- 5.14.9. Overall, the future noise climate at the Development can be controlled through appropriate noise mitigation measures to meet acceptable noise levels in both internal and external amenity areas which will accord with the 'No Observed Adverse Effect Level' as detailed in the PPG and as such noise should not be deemed to be a determining factor in the granting of planning permission for this Site.

5.15. Air Quality

- 5.15.1. The NPPF at paragraph 192 states that:

“Planning policies and decisions should sustain and contribute towards compliance with the relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate the impact should be identified such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan making stage to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas or and Clean Air Zones is consistent with the local air quality action plan.”

- 5.15.2. The East Suffolk Suffolk Coastal Local Plan Policy SCLP10.3 (Environmental Quality) expects development proposals to protect the quality of the environment and minimise and reduce all forms of pollution and contamination. This application is supported by an Air Quality Assessment (AQA) which assess potential impacts associated with fugitive dust emissions during the construction phase of the Proposed Development, assess potential impacts associated with road transport emissions during the operational phase of the Proposed Development and assess risk of future occupant exposure to any existing air quality issues; and, identify any requirement for relevant mitigation measures.
- 5.15.3. Potential construction phase air quality impacts from fugitive dust emissions were assessed as a result of earthworks, construction and trackout activities. It is considered that the use of the identified site-specific control measures would provide suitable mitigation for a development of this size and nature and reduce potential impacts to an acceptable level.
- 5.15.4. Potential impacts during the operational phase of the proposals may occur due to road traffic exhaust emissions associated with vehicles travelling to and from the Proposed Development. Additionally, future occupants may be exposed to any existing air quality issues at the site. Dispersion modelling was therefore undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the highway network both with and without the development in place. Results were subsequently verified using local monitoring data.
- 5.15.5. Review of the dispersion modelling results indicated that air quality impacts as a result of traffic generated by the Proposed Development were not predicted to be significant at any sensitive location in the vicinity of the site.
- 5.15.6. The results of the assessment also demonstrated that predicted pollution levels were below the relevant criteria at all locations across the Proposed Development. As such, the Site is considered suitable for the proposed use from an air quality perspective and mitigation is not required. Based on the assessment results, air quality factors are not considered a constraint to the Proposed Development.
- 5.15.7. The Proposed Development is therefore considered to be compliant with the requirements of Policy SCLP10.3 of the Suffolk Coastal Local Plan.

5.16. Health

- 5.16.1. A Health Impact Assessment (HIA) has been submitted with this application to assess the potential health and wellbeing impacts of the Proposed Development on the existing and future local population.

- 5.16.2. The aspiration is for the development of the Site to deliver long-term health and wellbeing benefits for residents, workers, visitors and existing communities.
- 5.16.3. The baseline analysis presented in the HIA highlights that East Suffolk's population generally exhibit good health outcomes in comparison with wider geographies, demonstrating the strong base upon which to build further health and wellbeing improvements through the enhancement of the built environment. Several potentially vulnerable groups were, however, identified, these including:
- **People at risk of low rates of physical activity**, which is an identified local health issue (contributing to unhealthy weight as a linked issue) that could potentially be addressed through enhancements to active transport

infrastructure (such as walking and cycling routes) and open space and recreation facilities.

- **Older and disabled people and those with long-term illnesses and conditions**, who generally have greater need for healthcare services.
- **Lower-income households**, including those in need of affordable housing, who are at higher risk of food and fuel/energy poverty, especially given current inflationary pressures and the related cost-of-living crisis.
- **Vulnerable road users**, such as pedestrians, cyclists and all others using non-motorised transport, who can be at greater risk from injury as a result of having to share road-space with larger, more powerful vehicles.

5.16.4. Overall, the HIA has found that the Proposed Development will not result in negative impacts on the health of the existing or future population of the immediate and local areas that cannot be effectively mitigated.

5.16.5. Indeed, the Proposed Development is assessed as making a number of positive contributions, which are summarised in Table 6.1 within the HIA, in terms of health and wellbeing for all members of the community, with a number of these having a particular impact in terms of identified potentially vulnerable groups highlighted above.

5.16.6. As demonstrated by the summary at Table 6.1 the Proposed Development will deliver a number of beneficial impacts, which are likely to lead to long-term improvements in local health and wellbeing outcomes for existing communities in Saxmundham and the new residents of South Saxmundham Garden Neighbourhood, with many of the beneficial effects being particularly relevant to identified potentially vulnerable groups.

5.16.7. The Proposed Development is therefore considered to be compliant with the requirements of the Healthy Environments SPD for planning applications for developments over 50 dwellings to be supported by a Health Impact Assessment.

5.17. Sustainability

5.17.1. A Sustainable Construction Statement has been submitted with this application to demonstrate how the Proposed Development supports the sustainability objectives of both local and national policies.

5.17.2. Sustainable Design – Creation of a well-designed development that minimises impact on the environment and includes a number of sustainable design features to mitigate and adapt to the effects of climate change.

- 5.17.3. Climate Change Mitigation, Carbon, and Energy – The development will incorporate measures to reduce carbon emissions throughout demolition, construction, and operation in line with the Building Regulations and the requirements of Policy SCLP9.2 as well as Sustainable Construction SPD.
- 5.17.4. Embodied carbon will be reduced through the procurement of sustainable materials. Homes and buildings will be all-electric and Net Zero Ready, meeting the requirements of the FHS and FBS through a range of fabric, energy efficiency and potential use of low carbon renewable energy.
- 5.17.5. Specification of water efficient fittings to reduce water consumption to 110 litres per person per day for homes, and non-domestic buildings align with the requirements of BREEAM Water Consumption criteria.
- 5.17.6. Adaptation to Climate Change - The design includes adaptation measures to ensure the long-term resilience of the development to the effects of climate change. Measures include the incorporation of Sustainable Drainage Systems (SuDS), as well as measures to enhance water efficiency and reduce the risk of overheating in line with Policies SCLP9.2, SCLP9.5, SCLP9.6, and SCLP9.7.
- 5.17.7. Waste and Recycling – Provision of measures through construction and operation of the Site to reduce pollution, minimise waste and encourage recycling, in line with Policy SCLP11.1.
- 5.17.8. Biodiversity – The development will be designed to include provision of measures to protect and enhance on-site ecology. Based on the current landscape designs and future aspirations of the site, The proposed development is expected to achieve a net gain in biodiversity of +49.24 habitat units (+34.37%), and +14.50 hedgerow units (+27.89%) in accordance with the minimum statutory requirement by Environmental Act 2021 and Policy SCLP10.1.
- 5.17.9. Sustainable Transport – The development is in a sustainable location with multiple sustainable and active travel options, as well as provision of EV charging points, in line with Policies SCLP7.1 and SCLP7.2.
- 5.17.10. Socio-economic Benefits – The proposed development will deliver a range of socio-economic benefits to both new and existing residents through construction of 800 homes (including affordable housing) and associated community uses, making improvements to public realm, landscape planting, walking, and cycling routes, and improved accessibility, creating a healthy living environment for local people. The development also promotes the economic vitality of the areas through the creation of jobs and benefits to the local supply chain, in line with Policies SCLP5.10, SCLP8.2, SCLP11.1, and SCLP12.29.

5.18. Utilities

- 5.18.1. A Utilities Statement has been submitted to demonstrate that there is sufficient capacity in utility infrastructure to accommodate the Proposed Development.

Electricity

- 5.18.2. The Benhall PSS is supplied by a 33KV connection from Wickham market to the west, and with a 33KV from the Benhall PSS crossing southeast across the southern part of the Site.
- 5.18.3. Existing 11kv high voltage (HV) circuits from Benhall PSS cross the northern part of the employment Site on the west side of the A12 towards Saxmundham town and crossing in a southerly direction to supply two properties on Kiln Lane to the east of the A12.
- 5.18.4. Pigeon has been provided by UK Power Network (UKPN) with costs to divert existing infrastructure (11KV and 33KV) where this is necessary to facilitate the development and to ensure continuity of services to existing dwellings.
- 5.18.5. Consultations have been undertaken with UKPN Distribution Planning Engineers for supply of electricity to the new development, including both the employment/roadside services, and for the residential scheme. UKPN has confirmed the availability of 6.5mva at the Benhall PSS which is sufficient to provide for all elements of the scheme.

Gas

- 5.18.6. A high pressure (HP) gas main passes to the west of Saxmundham and provides the point of connection for MP and LP networks within Saxmundham. Medium Pressure (MP) pipes are located along the south edge of the current urban area feeding the LP networks via pressure reduction stations. Low pressure (LP) networks are located within the urban areas immediately to the north of the Site.
- 5.18.7. There is a medium pressure gas main crossing the northern edge of the Site crossing from the school grounds to the railway. This gas main can either be accommodated in the scheme layout or diverted.
- 5.18.8. There are no MAH2 pipelines crossing or close to the scheme that would impose restrictions on the scheme.
- 5.18.9. No gas services will be provided to the Site with all space heating and other domestic requirements provided by electricity and renewable energy.

Wastewater

- 5.18.10. Saxmundham is in the drainage catchment of the Anglian Water Benhall WRC3 located south of Benhall on Aldercarr Lane. Existing sewers within Saxmundham drain eastwards under the railway and to a trunk sewer following the west bank of the River Fromus heading south to the Benhall WRC.

- 5.18.11. The AW Section 98 Scheme Proposal Report confirms that a Point of Connection for the SSGN development (including the employment and roadside services) can be made to the public wastewater sewer located in Kiln Lane to the east of the railway.

Potable Water

- 5.18.12. The incumbent potable water network provider is Essex and Suffolk Water (ESW). ESW infrastructure in the locality is shown on the Asset Plan.
- 5.18.13. ESW has local distribution mains located in the Saxmundham urban area. In addition, they have a 10” trunk water main located on the west side of Saxmundham crossing under the A12, and a 250mm dia. trunk main crossing through the northern part of the Site and passing under the railway. The 250mm pipe is a strategic water main potentially supplying Sizewell C and hence is not suitable for the primary point of connection.
- 5.18.14. The 250mm water main will either need to be diverted to avoid the scheme or the scheme layout will be designed to accommodate the current pipeline route with an appropriate easement provided.
- 5.18.15. ESW has confirmed that they have adequate resource capacity to supply the scheme, and that there is currently sufficient mains capacity to supply the scheme of 800 – 1000 dwellings.

Telecommunications

- 5.18.16. Openreach services are available within the Saxmundham urban area. The scheme will be registered with Openreach and Pigeon will work with Openreach and independent operators to provide fibre telecoms connections to all residential and commercial premises.

5.19. Minerals

- 5.19.1. An assessment for the minerals resources below the Site has been prepared by Geosphere Environmental Ltd and a Minerals Safeguarding Assessment has been submitted with this application.

- 5.19.2. Paragraph 222 of the NPPF states:

“It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy, and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.”

- 5.19.3. The Suffolk Minerals and Waste Local Plan (SMWLP), adopted from July 2020 (ref. R.5), which provides a guideline for future Mineral extraction, specifically Sand and Gravel, development and waste management facilities in Suffolk.
- 5.19.4. The policy contains strategic objectives and policies (MP1 – MP10) to identify Minerals Consultation and Safeguarding Areas and to ensure any extraction is undertaken in a sustainable manner, reducing impacts on amenity and the environment, although it recognises the need for sites to be developed for housing, employment, and infrastructure under an increasing population.
- 5.19.5. In the context of Proposed Development of land (for construction), those sites over 5 Ha in size, must comply with Policy MP10, whereby:
- “a) The County Council will, when consulted by the Local Planning Authority, object to such development unless it can be shown that the sand and gravel present is not of economic value, or not practically or environmentally feasible to extract, or that the mineral will be worked before the development takes place or used within the development”.
- 5.19.6. b) The MPA will advise the Local Planning Authority whether any Proposed Development might prejudice the future extraction of minerals and should be refused, or whether such development itself might be prejudiced by proposed mineral working.”
- 5.19.7. Policy SCLP12.29 (South Saxmundham Garden Neighbourhood) also sets a requirement for any planning application to supported by “*evidence which assesses the quality and quantity of sand and gravel resources on site in order to determine whether on-site resources should be used on-site during development*”.
- 5.19.8. In the context of the SMWLP, granular soils of the Crag Group may be considered as a valuable Mineral, with Particle Size Distribution (PSD) testing indicating the soils may be considered as a Class 1B – Uniformly graded granular material. On a site wide basis, Mineral soils were found to reside in the following Land Parcels and depths:
- South of Land Parcel P2: 4.70m bgl.
 - Northeast corner of Land Parcel P5: 1.25m bgl - 2.70m bgl.
 - Northeast corner of Land Parcel P7: 4.00m bgl.
 - South of Land Parcel P8: 4.50m bgl.
 - Land Parcel P9: 0.9m bgl - 2.80m bgl.

- 5.19.9. It was understood that Land Parcels P2 and P9 were to remain as open green space (SANG and BNG), albeit incorporating SuDS drainage basins. Therefore, excavations within this area will likely recover a proportion of Mineral soils for reuse. However, given the depth at which Mineral soils were encountered, it is likely that more non-mineral soils will be recovered. Nevertheless, once the final design of drainage basins is established, it may be possible to provide estimated quantities of Mineral recovery.
- 5.19.10. It is unlikely that any significant Mineral quantities will be encountered during the development of the scheme and a Minerals Management Plan (MMP-M) would not be suitable for the site. However, any reduction in site level (“cutting”) as part of site preparations should be considered as to the potential for encountering Crag Group Mineral for subsequent excavations.
- 5.19.11. Prior to the use of Mineral for structural purposes, its engineering and compaction parameters should be known so that they perform to the requirements of the design, with surplus soils subject to reuse rather than being disposed to landfill. Opportunities to ‘donate’ surplus soils to a ‘receptor’ site (i.e., an offsite development scheme where a deficit in soils and Mineral exists), should be explored through a Materials Management Plan or similar document.
- 5.19.12. It is recommended that liaison is undertaken with the relevant Local Planning departments at an early stage to ensure the appropriate actions are maintained with regards to Mineral re-use and waste.

5.20. Planning Balance

- 5.20.1. In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 the determination of planning applications must be made in accordance with the adopted development plan, unless material considerations indicate otherwise.
- 5.20.2. This section sets out an assessment of the planning balance and attributes weight to the planning benefits and harm that is set out in the planning assessment in section 5.

Social Benefits

- The Proposed Development will deliver a new 2FE primary school and pre-school – Significant weight.
- The Proposed Development will deliver 800 homes with 1 in 3 homes being affordable – Substantial weight.
- Enhancements to the existing PRow network and the creation of my cycleways to connect the Proposed Development to the town – Moderate weight.

- The Proposed Development will deliver a new community hub with the creation of spaces for shared community used being likely to boost social interaction amongst new and existing residents – Moderate weight.

Social Harm

- Use of a proportion of BMV land for housing which would take land permanently out of agricultural use – Limited weight.

Environmental Benefits

- Creation of 15.55ha of new Suitable Alternative Natural Greenspace (SANG) with distinct natural character – Significant weight.
- Creation of 12.04ha of new open space (Parks and Gardens, Allotments and Amenity Greenspace) throughout the development – Moderate weight.
- The Proposed Development will deliver a biodiversity net gain of 25.07% for habitats and 22.97% for hedgerows. The Landscape Strategy includes the creation of 1.1km of new hedgerow planting, enhancement of 0.85km of hedgerow, 7.57ha of ‘other’ lowland acid grassland, 2.24ha of “modified” grassland, 9.73ha of ‘other’ neutral grassland and 3.6ha of new SUDS basins. – Significant weight

Environmental Harm

- The Proposed Development will result in a localised loss of arable land, however, the majority of structural vegetation would be retained and protected throughout the construction period – Limited weight.
- Overall, the scale and degree of change on the landscape would be recognised since the Site currently forms partially enclosed arable land, however, the Site is heavily influenced by the A12 and East Suffolk Railway Line, both of which sever the site – Moderate weight.

Economic Benefits

- The construction and operation phases of the Proposed Development will provide jobs and local supply chain opportunities – Moderate weight.
- The Proposed Development will help to diversify the employment opportunities in the local area with the deliver of new employment land, new roadside services and community retail uses – Moderate wight.

6. Conclusions

- 6.1.1. It is demonstrated through the assessment that the degree of change would be recognised in the landscape but due to its location, that is heavily influenced by the A12 and East Suffolk Railway Line, the social, environmental and economic benefits of the scheme would clearly outweigh the moderate harm to the landscape.
- 6.1.2. The Proposed Development will delivery significant benefits to the supply of homes, including affordable homes, within the district and the social benefits of the community infrastructure, enhancements to Public Rights of Way and the delivery of a new 2FE Primary School and Pre-School will significantly outweigh the loss of agricultural land.
- 6.1.3. The impacts associated with the Proposed Development will be appropriately address through the design of the scheme, habitat creation and green infrastructure enhancements. The highways impacts associated with the Proposed Development will be appropriately mitigated through the implementation of speed reduction measures of along the A12 and junction upgrades on receiving junctions around Saxmundham.
- 6.1.4. In consideration of compliance with the Development Plan and other planning policy requirements, the significant benefits associated with the Proposed Development clearly outweigh the limited adverse effects.
- 6.1.5. While there is not complete compliance with the development plan, owing the inclusion of the land outside of the allocation, it is clear that the Proposed Development is policy compliant and where there is a departure from policy it is necessary to ensure that the Proposed Development is deliverable and minimises all identified impacts.
- 6.1.6. It is considered that the development is complied with holistically and is therefore acceptable in planning terms. It is therefore considered that the proposal should be approved without delay.