

FORMAL PLANNING OBJECTION

SOUTH SAXMUNDHAM GARDEN NEIGHBOURHOOD

WEST OF A12 COMMERCIAL DEVELOPMENT

Executive Summary

This representation objects to the proposed commercial development west of the A12, including the service station, HGV parking, roadside services, hotel, drive-through restaurants and associated employment land.

The objection does not challenge the principle of housing growth within Saxmundham. Rather, it questions whether the western commercial zone is necessary, justified or capable of being accommodated without unacceptable environmental, heritage and landscape harm.

The application should not be determined until additional information has been provided.

1. Failure to Demonstrate Need

The applicant has not demonstrated:

- Why a service station is required.
- Why HGV parking is required.
- Why hotel accommodation is required.
- Why drive-through restaurants are required.
- Whether the inevitable automation of warehouses, constitutes a viable employment zone.
- Why these uses must be located on this site when there is are over two hectares of unused industrial land available at Carlton Park

The application appears to assume the necessity of these uses rather than proving it.

A specific needs assessment should be required.

2. Insufficient Information

The submitted material does not provide sufficient detail regarding:

- Commercial building layouts.
- Service yards.
- Loading arrangements.
- HGV circulation routes.
- Operational hours.
- Lighting infrastructure.
- Future occupiers.

Without this information the Council cannot properly assess environmental impacts.

3. Veteran Trees and Irreplaceable Habitat

The applicant's own documents identify approximately twenty-seven veteran trees within the western parcel.

These constitute irreplaceable habitat.

The application has not demonstrated how long-term deterioration of these assets will be avoided.

The Council should require:

- Detailed veteran tree impact assessment.
 - Long-term management proposals.
 - Assessment of hydrological change.
 - Assessment of lighting impacts.
 - Assessment of operational disturbance.
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4. Ecological Connectivity

The western parcel contains:

- Important hedgerows.
- Mature hedgerow trees.
- Ponds with resident otters.
- Bat corridors.
- Established extensive brown hare habitat (not 'transitory 'as stated in the planning doc).
- Established amphibian habitat with active sites of Great Crested Newts.

The development appears to rely heavily on future mitigation and habitat creation rather than avoidance of harm.

The mitigation hierarchy requires avoidance before compensation.

5. Biodiversity Net Gain

The BNG calculations depend heavily upon future habitat creation and management.

However:

- Existing ecological assets are already present.
- Habitat creation is not equivalent to mature habitat.
- Ecological connectivity may be lost.
- Lighting impacts are not adequately addressed.

An independent review of BNG assumptions should be undertaken.

6. Heritage and Historic Landscape

The western parcel contributes to the setting of:

- Benhall Church.
- Benhall
- Historic routeways and deer parks.
- Archaeological features identified by survey work.

The significance of these assets derives not solely from visual relationships but also from tranquillity, darkness, openness and historic landscape character.

The introduction of roadside services, HGV activity and extensive lighting risks substantial harm to that setting.

7. Landscape and Visual Impact

The western parcel forms an important rural approach to Saxmundham.

The proposal introduces:

- Service station infrastructure.
- Parking areas.
- Commercial buildings.
- Signage.
- Lighting.
- HGV activity.

The cumulative impact would fundamentally alter the character of this landscape.

The need for extensive screening demonstrates the visual sensitivity of the location.

8. Impact on Saxmundham Town Centre

The application has not demonstrated that the proposed roadside commercial development will support the vitality and viability of Saxmundham town centre.

Instead it may divert expenditure away from existing businesses.

The Council should require an assessment of:

- Economic impacts on the town centre.
 - Effects on independent businesses.
 - Consistency with regeneration objectives.
 - Alternative approaches that strengthen the existing town.
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9. Sustainability Contradictions

The application promotes:

- Walking.
- Cycling.
- Public transport.
- Reduced car dependency.

At the same time it proposes:

- Petrol sales.
- Drive-through restaurants.
- HGV parking.
- Strategic roadside services.

The applicant has not adequately explained how these uses contribute to the stated objectives of a sustainable Garden Neighbourhood.

10. Further Information Required

Prior to determination the Council should require:

1. Roadside services needs assessment.
 2. HGV parking justification.
 3. Detailed western parcel layout.
 4. Lighting strategy.
 5. Veteran tree impact assessment.
 6. Bat corridor assessment.
 7. Great crested newt review.
 8. Heritage setting assessment.
 9. Visualisations from Benhall Church and Benhall.
 10. Town centre economic impact assessment.
 11. Independent biodiversity review.
 12. Cumulative landscape impact assessment.
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Conclusion

The western parcel contains some of the most environmentally, historically and visually sensitive land within the allocation. It is a unique and valuable asset for Saxmundham's residents and businesses, offering health, culture, recreation and tourism with direct access to the Alde Valley.

At the same time it is proposed to accommodate the most intensive commercial uses and the first industrial incursion into the Alde Valley, one of the county's most beautiful and unspoilt areas.

The applicant has not demonstrated that these uses are necessary, nor that their impacts can be adequately mitigated.

The Council should therefore withhold determination until the requested information has been provided and independently assessed.