

SAXMUNDHAM TOWN COUNCIL

Representation on the Outline Planning Application for the South Saxmundham Garden Neighbourhood

PART 1

Evolution of the Garden Neighbourhood concept and policy 2017-2020

Introduction

1. Saxmundham Town Council has been actively engaged in the evolution of proposals for the South Saxmundham Garden Neighbourhood since East Suffolk Council first proposed an allocation for around 800 new dwellings in the emerging Suffolk Coastal Local Plan in 2018. The proposals have evolved significantly since that time.

2. From the outset, the Town Council supported the principle of significant housing growth over the Local Plan's duration, as part of the town's long-term sustainability. However, it consistently argued that:

(a) the scale of development should not exceed around 500 dwellings, reflecting the capacity of Saxmundham's physical, social and community infrastructure;

(b) the proposed location to the south of the town was the wrong one, having regard to factors including connectivity, coalescence, landscape and heritage. In particular, the initial proposal to build housing on The Layers, the historic entrance to the town from the south, was overwhelmingly rejected by local people. The Town Council instead argued that all or much of the new housing should be located to the east of the town; and

(c) support for new development should be on the basis that it respects the character and identity of the town, is successfully integrated physically and socially with the existing community, and is accompanied by the necessary physical, social and community infrastructure.

3. The second draft of the Local Plan, published in early 2019, appeared to move away from housing development on The Layers by indicating that the main development should be located between the railway line and the A12, although the policy remained unclear. It also introduced, for the first time, a proposed employment allocation on the west side of the A12.

4. In summer 2019, the Town Council undertook a large-scale public consultation on the future of Saxmundham, including the proposed Garden Neighbourhood allocation. Almost 1,000 responses were received (around 25% of households). The results strongly endorsed the Town Council's position. Only 26% of respondents supported locating all 800 homes to the south of the town, whilst 55% favoured development wholly or partly to the east. Just one third supported 500 or more new dwellings over the Local Plan period.

5. Also in summer 2019, the Town Council participated in the examination of the Suffolk Coastal Local Plan, advocating changes to the scale and location of the Garden Neighbourhood and for The Layers to be removed from the settlement boundary. Whilst the Inspector did not support changes to the scale or overall location of the development, he did recommend excluding The Layers from the settlement boundary. The Employment Area allocation remained outside the settlement boundary as an exception site.

6. Pigeon also played an active role in the Local Plan examination, advocating for a variation to the Garden Neighbourhood allocation to include the land west of the A12 now proposed for roadside services and commercial development. In its representations, Pigeon stated:

"...to complement the Garden Neighbourhood at Saxmundham, Pigeon... proposed a new site allocation on land to the west of the A12 and to the south of the allocated employment land. ...[T]he addition of the site will aid in the delivery of the Garden Neighbourhood, provide a new service area for the A12 and further employment opportunities within the motorway service area to add to the employment land provision within the Plan." [Pigeon–Turley response on Matter 2, Suffolk Coastal Local Plan Examination]

Neither East Suffolk Council nor the Inspector accepted this proposed allocation for roadside services.

7. Following the Inspector's report, East Suffolk Council adopted the Suffolk Coastal Local Plan in September 2020, including Policy SCLP12.29 for the South Saxmundham Garden Neighbourhood and its land allocation. Importantly, the policy requires the development to be delivered through a masterplan approach brought forward through landowner collaboration and community engagement.

Engagement with Pigeon over the development of their proposed Masterplan

8. In December 2020, just three months after the Local Plan was adopted, Pigeon launched its first public consultation on a proposed Garden Neighbourhood Masterplan. Owing to Covid restrictions, the consultation was conducted almost entirely online. Whilst broadly following the Local Plan allocation, the proposed Masterplan differed in two significant respects:

(a) the exclusion of The Layers, which policy SCLP12.29 designates for SANG purposes (with part possibly remaining in existing agricultural use);

(b) the inclusion of the large site on the west side of the A12 (next to the employment allocated site) for roadside services-related purpose - as put forward by Pigeon but not accepted by ESC in the Local Plan process.

9. In response, in January 2021 the Town Council considered its overall approach following the formal adoption of the Garden Neighbourhood policy as part of the Suffolk Coastal Local Plan. Without withdrawing its serious concerns regarding the scale and location of the development, the Council agreed the following approach:

"Whilst the [Local] Plan as adopted did not meet all of our points or wishes, the Council has expressed its commitment in principle:

(a) to cooperate with the developer(s) in implementing the Local Plan in the best way, in accordance with the adopted policy and approved site allocation;

(b) to engage fully and constructively to secure a successful, well-designed development that contributes positively to the town's economic, social and environmental wellbeing;
and

(c) to seek an appropriate contribution from the developer(s) towards the community facilities and infrastructure required to support the approximately 40% increase in population.”

10. This has remained the basis of the Town Council's approach to the Garden Neighbourhood over the past five years, informed throughout by detailed consultation with local residents. It also informs the Council's policies in both the adopted Saxmundham Neighbourhood Plan (2023) and the draft Modified Neighbourhood Plan, each seeking to achieve the best possible outcome for the town. Whilst the adopted Neighbourhood Plan could not include detailed policies for the Garden Neighbourhood, as part of the site then lay within the parish of Benhall, it established the Council's overarching objective (paragraphs 1.10–1.16):

Objective 4:

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

11. Consistent with this approach, in 2023 the Town Council and the Neighbourhood Plan Steering Group accepted Pigeon's invitation to participate in an extended series of meetings to contribute to the development of a Masterplan for the Garden Neighbourhood, in accordance with the Local Plan's requirement for a masterplan-led approach based on community engagement. Throughout that process, the Town Council made clear that the proposed roadside services and commercial development west of the A12, being outside both the Local Plan allocation and the Neighbourhood Plan and within the countryside, could only be justified if its overall benefits demonstrably outweighed its disadvantages to the town and parish, in planning terms.

12. In relation to the principal Garden Neighbourhood development east of the A12, the Town Council's discussions with Pigeon have generally been constructive, with a number of outcomes reflected in the final masterplan. In particular, the Town Council considered the key issues to include:

(a) physical connectivity to the town, in particular the proposed cycleway/footpath linking the site through the cemetery to the station and town centre, providing the non-vehicular connection that the Town Council has consistently advocated;

(b) the retention and use of existing hedgerows and public rights of way as the basis for a central green corridor for non-motor forms of movement through the site, linking the town, the new neighbourhood and the wider countryside, including a controlled crossing of the A12; and

(c) the overall layout of the development, including the location of the community hub, primary school and principal areas of open space.

13. In summary, the Town Council's engagement with Pigeon has been guided throughout by the objectives for the Garden Neighbourhood set out in the draft Modified Neighbourhood Plan:

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

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

14. These objectives have guided the Town Council's assessment of the current planning application.

PART 2

Response to DC/26/1490/OUT - Hybrid planning application to include: (a) full permission for the primary drainage infrastructure and associated construction access; and (b) outline planning permission (all matters reserved except access) for residential development, employment and community development, roadside services, land for Primary School and Pre-school, and associated development including open space, Suitable Alternative Natural Green Space (SANG), infrastructure, landscaping and associated works (development to be brought forwards in phases).

Introduction

15. Pigeon's hybrid planning application for the South Saxmundham Garden Neighbourhood was submitted in April 2026 and validated by East Suffolk Council on 27 May 2026. It seeks full planning permission for the primary drainage infrastructure and associated construction

access, together with outline planning permission for the wider Garden Neighbourhood, including residential, employment, community, education and roadside services development, open space, Suitable Alternative Natural Greenspace (SANG), landscaping and associated infrastructure.

16. This description is, however, somewhat misleading. The "full permission" element refers to the primary drainage infrastructure and its associated construction access for *drainage construction* purposes. In practice, however, the proposed access arrangements are far more significant. They include the principal vehicular access into the Garden Neighbourhood, the new A12 roundabout and the access serving the proposed roadside services site west of the A12, which lies outside the Local Plan allocation.

17. The proposed location of the roundabout therefore has implications that extend well beyond drainage infrastructure. Approval of these works would effectively establish the principal access strategy for the wider development and, in doing so, risks pre-determining the acceptability of the proposed roadside services development. Were that element of the application not to be supported, the location and form of the roundabout could require reconsideration, particularly in relation to providing access to the allocated employment land.

Planning policy and status of the sites within the application

18. As the Town Council has consistently maintained since Pigeon first presented its proposals in 2020, the application differs in significant respects from the Garden Neighbourhood allocation in the adopted Local Plan. Each element of the application must therefore be assessed against its own planning policy context.

(a) the principal development site, comprising the residential, community and associated uses between the A12 and the railway, together with the employment site west of the A12, forms part of the Garden Neighbourhood allocation in the adopted Local Plan;

(b) the southern tip of land between the A12 and the railway, which remains within the parish of Benhall, does not form part of the Local Plan allocation. It is proposed for Suitable Alternative Natural Greenspace (SANG) and open space rather than built

development and, on that basis, its inclusion within the application gives rise to no specific concerns for the Town Council;

(c) the application proposes part of the land east of the railway as SANG and open space, which is consistent with the Local Plan allocation. However, the Local Plan identifies a much larger area for these purposes, including The Layers. From the outset, the Town Council has advocated the inclusion of part of The Layers within the SANG/open space provision as a preferable solution. Nevertheless, the area proposed by Pigeon lies within the allocated policy site;

(d) the proposed roadside services west of the A12 and south of the employment allocation have no policy basis in the Local Plan allocation for the Garden Neighbourhood. It must therefore be justified independently against other relevant planning policies. This is considered in the following section;

(e) the further site west of the A12, to the south of the proposed roadside services site, which is proposed solely for Biodiversity Net Gain purposes, does not form part of the Local Plan allocation. As it does not involve built development, its inclusion within the application gives rise to no specific concerns for the Town Council.

Planning policy and the proposed ‘roadside services’ site

19. The Town Council considers the following planning policy context to be relevant and not a matter of dispute:

(a) the proposed roadside services site, within the open countryside outside the settlement boundary, does not form part of the Local Plan allocation for the Garden Neighbourhood, and

(b) the Local Plan contains no specific policy governing the justification for and location of significant roadside services sites.

20. In the Planning Statement submitted by LDA Design on behalf of Pigeon, the proposed roadside services development is described as follows:

"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."

The Town Council notes that this is, by any measure, a substantial commercial development immediately opposite a major new residential neighbourhood. It also notes that, whilst the Planning Statement refers to electric vehicle charging points, subsequent sections of the Statement refer only to a petrol filling station.

21. Pigeon's Planning Statement first seeks to justify the proposed roadside services by reference to:

"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 Town Council notes, however, that Circular 01/2022 was published on 23 December 2022 by the Department for Transport to provide updated guidance for the Strategic Road Network (SRN) and the delivery of Sustainable Development. The guidance specifically relates to the SRN, namely the Motorway and Trunk Road Network only, which is currently administered by National Highways. Paragraph 10 of Circular 01/2022 expressly states that it does not apply to the Major Road Network, except where it interfaces with the Strategic Road Network. The A12 road adjacent to the application site is neither Motorway nor a Trunk Road administered by National Highways. The site in question is a considerable distance from the SRN and thus does not interface with this network. Consequently, we consider little or no weight should be given to this Department for Transport Circular in the determination of this planning application.

22. Nevertheless, the Town Council accepts, by analogy, that a legitimate planning case for appropriately located and justified roadside services on major routes such as the A12 might be made where they genuinely support the safety and welfare of road users, based on specific evidence of need. The key planning questions are therefore whether there is a demonstrable

need for such facilities at this location (which we do not accept – see below) and whether a development of this scale can properly be regarded as sympathetic to its surroundings. In the Town Council's view, the proposed development fails the latter test. The site occupies open countryside immediately opposite a major new residential neighbourhood and cannot reasonably be regarded as sympathetic either to its rural setting or to the character of the emerging community. Furthermore, good quality roadside services already exist nearby, including at Friday Street, Darsham and Woodbridge, whilst comprehensive service areas commonly operate at greater intervals.

23. Secondly, LDA argue that there is a "policy vacuum" in the Local Plan in relation to roadside services and therefore rely upon paragraph 111(e) of the National Planning Policy Framework:

“Planning policies should:

e) provide for any large-scale transport facilities that need to be located in the area [46], and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy.

Footnote 46: 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 (and most such proposals are unlikely to be nationally significant infrastructure projects).”

The Town Council does not consider this to be a persuasive justification in the circumstances of this application. Paragraph 111(e) is directed towards the preparation of planning policy, not the justification of individual planning applications. In this case, the Local Plan process specifically considered whether land west of the A12 should be allocated for roadside services. Pigeon promoted such an allocation during the examination of the Local Plan, but it was accepted neither by East Suffolk Council nor by the Inspector.

24. To illustrate the point, the same reasoning could equally be used to argue that other forms of transport infrastructure listed in footnote 46 (even an airport!) could be promoted as part of a

Garden Neighbourhood simply because they appear in national policy. That cannot have been the intention of paragraph 111.

The absence of a specific Local Plan allocation cannot therefore be characterised as a policy vacuum. Rather, it reflects a conscious planning decision not to allocate this land for roadside services.

25. The Town Council makes two specific points:

- paragraph 111 is directed towards the preparation of *planning policy*. By its nature, the identification of sites for large-scale transport infrastructure should be considered through the plan-making process, where alternative sites, need and impacts can be properly assessed through consultation and examination. East Suffolk Council has been aware of Pigeon's aspirations for this site for at least six years. There has therefore been ample opportunity for a specific policy on roadside services to be developed had such a need been identified. The purpose of a policy-led approach is precisely to assess strategic need and alternative options before individual planning applications are determined.
- the Town Council does not accept that there is any case for large-scale facilities on this site. In any event, the applicant has failed to demonstrate that large-scale roadside services *need* to be located on this site, as required by paragraph 111(e). No assessment has been provided of existing or future provision along this section of the A12, no evidence of unmet need has been produced, and no consideration has been given to alternative locations. Nor has the applicant demonstrated that a commercial development of this scale would be sympathetic to the character of the surrounding area.

26. For completeness, the Town Council has considered the further arguments put forward by LDA (paragraph 5.2.7 onwards) and does not consider them to be persuasive. The arguments advanced in support of an out-of-town-centre hotel development are, in the Town Council's view, similarly flawed. The Town Council would be pleased to provide further observations should the Local Planning Authority consider this helpful.

27. In summary, the Town Council's position in relation to the proposed roadside services site is as follows:

(i) Pigeon promoted the allocation of this site for roadside services during both the preparation and examination of the Suffolk Coastal Local Plan (*"to include within the Site Allocation the A12 Service Area to the south of the employment allocation"*). East Suffolk Council considered, but did not adopt, that proposed amendment to Policy SCLP12.29. Accordingly, there was no "policy vacuum" by East Suffolk Council in relation to roadside services on this site. Rather, the Local Plan reflects a conscious planning decision not to allocate the land for that purpose;

(ii) Pigeon first promoted this site for roadside services only three months after the Local Plan was adopted. East Suffolk Council has therefore had more than five years in which to develop a specific planning policy for roadside services if it considered one to be necessary, rather than relying on ad hoc decision-making through individual planning applications. The Town Council also contends that the development proposed here does not fall within the scope of paragraph 111 of the NPPF, which is directed towards the strategic planning for genuinely large-scale transport facilities, and therefore provides no sound policy basis for this proposal;

(iii) in any event, if paragraph 111 applies, it refers to large-scale transport facilities that "need to be located in the area". The applicant has made no attempt to demonstrate such a need. Looking by analogy to Circular 01/2022, no assessment has been provided of existing or planned roadside services in the surrounding area, nor of whether any gap in provision exists that would justify a new facility at this location. Nor has any regard been paid to recommended spacing between facilities (the Circular refers to a maximum interval of 28 miles on motorways);

(iv) nor has any assessment been provided of the likely impact of the proposed roadside services on the Garden Neighbourhood immediately opposite, including the implications of its hours of operation, noise, lighting, vehicle and pedestrian movements, together with the attraction of the proposed facilities to residents. The inclusion of at least three fast-food restaurants is expected to generate significant pedestrian and cycle movements from the neighbouring residential areas. Despite this, no assessment has been undertaken of the likely volume or pattern of these movements, nor of the associated highway safety implications. In particular, there has been no consideration of how residents, including children and young people, would safely access the site on foot or by

bicycle, or whether the existing and proposed crossing facilities would be adequate to accommodate these movements safely;

(v) Likewise, no assessment has been made of the potential economic impact on Saxmundham and its town centre. No consideration has been given to the extent to which the proposed roadside services may attract residents away from existing town centre businesses, particularly within the food and drink sector, thereby undermining the vitality and viability of the town centre;

(vi) the Town Council notes an apparent inconsistency between the proposals originally presented during the master planning process, which focused principally on electric vehicle charging, and the Planning Statement, which places much greater emphasis on the petrol filling station. The reasons for, and implications of, this apparent change in emphasis have not been explained.

(vii) the Town Council therefore considers that the proposed roadside services development offers no demonstrated benefits to Saxmundham or the Garden Neighbourhood that outweigh its potential detriments, at least without far more detailed assessment and justification. The proposed location of the roundabout access junction has been moved south from that shown in the Local Plan specifically to accommodate access to the roadside services. As this site forms an integral part of the outline planning application, these issues should be fully clarified and resolved before any decision is reached on the application as a whole.

Public meeting - issues and concerns raised by residents

28. On 9 June 2026, the Town Council, together with Benhall and Sternfield Parish Council, held a public meeting to discuss the planning application. The meeting was well attended and generated a wide-ranging discussion. The following summarises some of the principal issues and concerns raised by residents. It is not intended to be a comprehensive record of the meeting.

Physical infrastructure and utilities

- Flood risk, surface water drainage, foul drainage and sewerage capacity.

- Emergency access and resilience, particularly the implications of a single vehicular access to the development.

Public services infrastructure

- Primary and secondary school provision, including the implications of increasing the proposed primary school from one-form entry in the Local Plan to the current two-form entry proposal.
- Medical and healthcare provision, particularly how adequate provision can be secured through the planning process.

Impacts on the town and transport issues

- Impact on Saxmundham town centre businesses.
- Traffic congestion in the town centre, particularly flows through Rendham Road and South Entrance.
- Speeding and road safety, particularly on the A12 and at its junctions.

Cumulative impacts

- The cumulative impacts of the Garden Neighbourhood, Sizewell C and other major energy infrastructure projects, particularly on the A12 and the surrounding road network.
- The need for multiple developers and infrastructure providers to adopt a coordinated and holistic approach to infrastructure planning and mitigation.

Environmental impacts

- Environmental and ecological impacts, including biodiversity and climate change.
- The long-term protection of The Layers, particularly given its re-submission through the recent Call for Sites as part of the Local Plan Review.

Housing

- Social and affordable housing provision, including how eligibility and allocation will operate.

Employment

- Employment opportunities arising from the development, including how planning conditions can ensure the employment allocation delivers genuine employment rather than predominantly storage or warehousing uses.

Construction phase impacts

- Concerns regarding construction traffic, particularly the proposed use of Kiln Lane.

Further issues

- Impacts on physical and mental health and wellbeing.
- The need for improved youth facilities and opportunities for young people.
- The proposed phasing and delivery timetable for the development and supporting infrastructure.

29. In the following sections, the Town Council comments on, and where appropriate raises questions about, the application proposals in the light of the issues and concerns raised by residents, together with other matters which it considers important to the future of the town.

Physical infrastructure of the site and utilities

30. The provision of drainage, a secure long-term water supply for a development of this scale, and adequate sewage treatment infrastructure are fundamental to the success and sustainability of the Garden Neighbourhood. In the context of climate change, with Suffolk expected to experience longer periods of warm, dry weather, these issues require particular scrutiny.

31. The Town Council considers that the Local Planning Authority should receive clear and reasoned confirmation from the relevant utility providers, at this outline stage, that these matters can be satisfactorily addressed in principle before planning permission is granted. In relation to wastewater drainage, the Utilities Statement accompanying the application states:

"The Section 98 Report advises that any capacity issues at Benhall WRC will be addressed by Anglian Water in their investment planning at the appropriate time."

"Pigeon is in ongoing talks with Anglian Water regarding the available capacity at the works and timing of any required treatment capacity upgrading."

However, the Town Council notes that Anglian Water has now formally objected to the application. Anglian Water advises that Benhall Water Recycling Centre does not currently have sufficient capacity to accommodate the additional foul flows arising from the proposed development and recommends refusal of the application on the grounds of insufficient wastewater treatment infrastructure and the risk of environmental harm. The Town Council therefore considers that this represents a significant infrastructure constraint which must be satisfactorily resolved before planning permission is granted.

32. In relation to potable water supply, paragraph 2.22 of the Utilities Statement states:

"Consultations have been held with ESW planning engineers. 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 dwelling."

Whilst this confirms that there is currently sufficient capacity, it does not provide assurance that adequate long-term water resources will remain available throughout the lifetime of the development, particularly in the light of projected population growth and the increasing pressures on water resources associated with climate change.

Public service infrastructure to serve new and existing community needs

33. As set out earlier in this response, the Town Council has consistently maintained that a Garden Neighbourhood of this scale, increasing Saxmundham's population by more than 35%, must be accompanied by the infrastructure and community facilities necessary to support both existing and future residents. Without appropriate investment, there is a real risk that the quality of life of both communities will be diminished.

34. This includes public service infrastructure such as education and healthcare. The Town Council is not suggesting that it is the developer's responsibility to provide every such facility

directly. Rather, the necessary infrastructure should be secured through the appropriate planning mechanisms, including Section 106 obligations and the Community Infrastructure Levy where applicable. However, where additional infrastructure is demonstrated to be necessary to make the development justified in planning terms, the absence of satisfactory provision is itself a material planning consideration.

35. The NPPF affirms the importance of such services at paragraph 101:

“To ensure faster delivery of other public service infrastructure such as health, blue light, library, adult education, university and criminal justice facilities, local planning authorities should also work proactively and positively with promoters, delivery partners and statutory bodies to plan for required facilities and resolve key planning issues before applications are submitted. Significant weight should be placed on the importance of new, expanded or upgraded public service infrastructure when considering proposals for development.”

Education

36. Policy relating to the Garden Neighbourhood in the Local Plan requires the provision of a new one-form entry primary school to serve the development. This level of provision is understood to reflect the forecast demand arising from approximately 800 new dwellings. The proposed school site identified within the Masterplan is acceptable in principle, and the Town Council raises no objection to its location.

However, the Masterplan and the Planning Statement refer to a two-form entry primary school, despite the site area remaining unchanged. This has created uncertainty as to whether the intention is simply to safeguard future expansion or whether the larger school would serve a wider catchment, potentially resulting in changes to the existing pattern of primary school provision in the area. Such an approach could have implications for parental choice and the continued viability of existing schools.

Pigeon has advised the Town Council that the site is intended to provide the flexibility to accommodate either a one-form or two-form entry school should future circumstances require, rather than indicating that a two-form entry school is currently proposed. As the planning and

commissioning of school places is the responsibility of Suffolk County Council, the Town Council looks to the County Council to clarify its intentions and confirm how the proposed education provision aligns with the adopted Local Plan requirements.

37. The Town Council also notes that, since the Garden Neighbourhood was allocated and promoted by East Suffolk Council, the town's secondary school has closed. As a consequence, all secondary-age pupils living in Saxmundham are now required to attend schools elsewhere, principally in Framlingham and Leiston. This will also apply to children living within the proposed Garden Neighbourhood. This represents a significant change in the baseline circumstances since the Garden Neighbourhood was originally conceived. The implications for travel demand, school transport, highway capacity and the availability of secondary school places should therefore be fully considered as part of the assessment of the development.

38. Given that a review of the Local Plan is now underway, the Town Council considers it essential that the future unitary authority addresses the absence of secondary school provision in Saxmundham. This is particularly important if the town is identified as a location for further significant housing and population growth. The long-term sustainability of the town depends not only on the provision of new homes, but also on ensuring that education infrastructure keeps pace with development and reduces the need for pupils to travel to schools outside the town.

Healthcare and medical services

39. When asked which facilities were most important in light of the town's planned growth, healthcare was identified by residents as the highest priority by a significant margin. A population increase of approximately 35% in Saxmundham will inevitably generate substantial additional demand for primary healthcare services and requires corresponding investment in local medical service provision.

40. The Infrastructure Delivery Framework (Appendix B to the Local Plan) identifies a Community Infrastructure Levy (CIL) contribution from the Garden Neighbourhood towards the estimated cost of expanding the existing GP surgery. However, the existing surgery is affected by periodic flooding and is located, in part, within the floodplain. The Town Council understands

that these constraints make expansion of the existing facility, as originally envisaged, unlikely to be practicable.

41. The Town Council is aware of ongoing discussions regarding the potential redevelopment of part of the former Fromus Centre site, together with the adjoining ambulance service land off Seaman Avenue, for primary healthcare purposes. This would appear to offer a more appropriate long-term location for expanded healthcare provision. However, progressing such a scheme will require agreement between the NHS, the relevant landowners and the existing GP practice, together with the necessary planning and funding approvals. It is therefore unlikely that a new facility could be delivered in the short term.

42. The provision of accessible, high-quality primary healthcare within Saxmundham is essential if the proposed Garden Neighbourhood is to be delivered as a sustainable development. While the existing GP surgery may just have sufficient capacity to accommodate the needs of residents of the initial phase of development, the Town Council considers it essential that, before the later phases of the development are occupied, appropriate long-term primary healthcare provision is secured to meet the needs of both the existing and future population.

43. The Town Council further considers that no development beyond an agreed phase of the Garden Neighbourhood (for example, following occupation of Phase 2) should be permitted unless and until adequate primary healthcare provision has been secured and is operational. This should include any new or expanded facilities necessary to serve both the existing and growing population. Appropriate planning conditions or planning obligations should ensure that the delivery of healthcare infrastructure is linked to the phasing of the development, so that population growth does not outpace the provision of essential services.

Transport issues and implications for the town

44. Vehicular access to and from the proposed Garden Neighbourhood is limited to a single point of access onto the A12. This is proposed to be provided via a new roundabout, for which full planning permission is sought as part of the application.

45. The A12 is already heavily trafficked and, for many years to come, will continue to accommodate substantial volumes of construction traffic associated with the Sizewell C project and the delivery of numerous Nationally Significant Infrastructure Projects (NSIPs) across East Suffolk. As East Suffolk Council has recognised:

"The area is experiencing an unprecedented concentration of NSIPs which are occurring sequentially and will overlap with one another, creating long-term construction presence and repeated disruption in a narrowly constrained geographic area. The cumulative impact of NSIPs are having dire consequences on traffic and transport, landscape and the environment..."

The Town Council shares this assessment. The coincidence of multiple major infrastructure projects, together with the proposed Garden Neighbourhood, will place significant additional pressure on the A12 corridor and the local highway network, particularly in and around Saxmundham. This application must therefore be assessed against the reality of these cumulative impacts rather than in isolation.

Transport Impact Assessment

46. The Town Council has a number of significant concerns regarding the transport strategy and supporting evidence submitted with the application. These concerns must be satisfactorily addressed before either full or outline planning permission can be granted.

47. The Town Council has consistently highlighted the highway and transport concerns arising from the proposed development and welcomes the inclusion of a Transport Impact Assessment (TIA) submitted in support of the application.

48. The three volumes of material submitted in support of the appraisal contain numerous tables, plans and technical appendices. However, the TIA is unnecessarily verbose and, disappointingly, contains numerous errors, inconsistencies and omissions. In the Town Council's view, it does not currently provide a sufficiently reliable evidence base upon which the Local Planning Authority can make an informed decision. In short, the TIA, as currently drafted, is not considered fit for purpose. This conclusion is reinforced by the consultation response of

Suffolk County Council Highways, which has concluded that it is not currently in a position to support the application and has requested substantial further assessment, evidence and revisions before it can reach a favourable recommendation.

Access

49. The A12 is a Principal Road forming part of the Primary Route Network (PRN) of England and Wales. It is a major north-south route running parallel to the coast and connecting key centres of population. An objective of the PRN is to minimise delays to through traffic. The anticipated traffic flows associated with the proposed development would, in the Town Council's view, support a simpler and more straightforward form of junction arrangement, thereby minimising delays to through traffic. The Town Council notes that East Suffolk Council approved a simple signal-controlled priority ('T') junction on the A12 at Martlesham to serve part of the Brightwell Lakes development, which will comprise in excess of 2,000 dwellings.

50. A single access road serving a development of approximately 800 dwellings is considered to be at the very upper end of, if not exceeding, normal safety standards. Historically, Design Bulletin 32 advised a limit of approximately 300 dwellings served by a single access. Whilst this guidance has been superseded by *Manual for Streets*, the 300-dwelling benchmark continues to be referenced by planning authorities and highway practitioners. For major developments of this scale (typically 500–1,000 dwellings or more), a secondary vehicular or emergency access is generally expected to provide resilience, facilitate emergency access and enable safe traffic dispersal.

51. The Town Council has yet to identify any Local Planning Authority that has granted planning permission for a development of approximately 800 dwellings, together with a primary school, pre-school and community hub, served by only a single point of vehicular access. The Town Council appreciates that, in preparing the masterplan, Pigeon has sought to mitigate some of these concerns through the provision of a dual carriageway entrance and looped spine road. However, these measures are not considered sufficient to overcome the inherent vulnerability of a single point of access.

52. The Town Council therefore strongly recommends that provision is made for a secondary and/or emergency access. It is noted that Lincoln Avenue was originally designed to provide potential access to the development site, but it is understood that Pigeon does not control the land required to complete this connection, as a ransom strip exists. Whilst the existence of a ransom strip is not uncommon, it should not prevent the proper planning of a development of this scale. The Town Council notes that Suffolk County Council's Passenger Transport Team also considers a bus connection via Lincoln Avenue to be the preferred solution, as it would significantly improve the viability of serving the development by public transport.

53. The Town Council notes that Suffolk County Council Highways has similarly advised that a residential development of this scale is significantly larger than would normally be accepted with a single point of access and has requested further details or an alternative solution to address emergency access and network resilience.

54. The proposed access is also in a different location from that shown in the adopted Local Plan's indicative Masterplan. The Town Council observes that the applicant has located the access to serve the proposed roadside services development, i.e. to land that was not allocated for development in the Local Plan. Should planning permission not be granted for the roadside services development, the position of the access may need to revert to that indicated in the adopted Local Plan, opposite the Employment land allocation.

55. The Town Council understands that the applicant proposes to construct a 40-metre Inscribed Circle Diameter (ICD) roundabout online. This gives rise to significant concerns as to whether its construction would result in unacceptable delays to traffic on the A12, particularly given the strategic importance of the route and the substantial volumes of construction traffic associated with Sizewell C and other NSIPs. The Town Council questions whether these impacts could be substantially reduced if the roundabout were constructed offline. The Town Council notes that Suffolk County Council Highways has expressed the same concern and remains unconvinced that the proposed roundabout can be constructed online without causing major disruption to the A12 and wider highway network.

56. The potential implications for highway safety, both during construction and once operational, should also be fully assessed before any consent is granted. In accordance with established highway design practice, a Stage 1 Road Safety Audit should be submitted to the Local Planning Authority to enable the proposed access arrangements to be properly assessed before any planning decision is made. The Town Council understands that such an audit has not yet been submitted. The Town Council notes that Suffolk County Council Highways has confirmed that a Stage 1 Road Safety Audit should be submitted before determination of the application and has deferred its recommendation pending further information. In these circumstances, we would contend that the Local Planning Authority does not yet have sufficient information to determine the application. Accordingly, no planning permission should be granted until these matters have been satisfactorily resolved.

57. The issues of speed limits, gateway features, footways, street lighting and other associated highway infrastructure, both during the construction period and following completion of the development, need to be explicitly addressed. These matters should be resolved at the outset of the project, not least because of the two proposed signal-controlled pedestrian and cycle crossing points in close proximity to the proposed roundabout. The Town Council considers that appropriate speed management and supporting highway measures are essential to ensure the safe operation of the junction and to provide a safe environment for pedestrians and cyclists.

The A12/ Rendham Road junction

58. Vehicular access between the residential areas of the proposed Garden Neighbourhood and Saxmundham town centre will principally be via one of two routes: either by turning left from the site on to the A12 and then left again at Benhall to enter the town via the B1121 South Entrance, or by turning right from the site and then right into Rendham Road.

59. The safety of the staggered crossroads junction of the B1119 with the A12 is a major concern for residents of Saxmundham and the surrounding villages. The junction has a poor accident record, including a fatal collision in December 2025. The proposed development will inevitably increase traffic using this junction, against the backdrop of substantially higher traffic volumes on the A12 arising from Sizewell C and other NSIPs. Any significant increase in traffic through this junction, without significant improvements to its safety and operation, must be avoided.

60. The Town Council notes that Suffolk County Council Highways has also concluded that the assessment of this junction is inadequate, has highlighted the absence of detailed accident analysis despite fourteen recorded injury collisions, and is awaiting the outcome of its own commissioned road safety study.

61. Whilst the Town Council notes that the applicant proposes changes to the speed limits in the vicinity of the junction, lower speeds may reduce the severity of collisions but do not, in themselves, address their principal cause. The available Suffolk County Council collision data indicates that turning conflicts are the predominant contributory factor. Furthermore, the collision data relied upon within the Transport Impact Assessment does not include the fatal collision that occurred in December 2025 and is therefore incomplete. The Town Council considers that appropriate improvements to the B1119/A12 junction are an essential prerequisite to the development and should be secured before significant occupation of the Garden Neighbourhood takes place.

62. The Town Council considers it essential that the safety and operation of this junction are comprehensively reviewed and that any improvements identified by Suffolk County Council Highways, in consultation with the police where appropriate, are secured as part of the development. Any planning permission should ensure that the junction is made as safe as reasonably practicable before the additional traffic generated by the development is introduced.

Traffic flows through the town with potential congestion issues in the centre

63. Saxmundham town centre is particularly sensitive to increases in traffic flows. The signal-controlled junction of the B1121 and B1119, which also provides access to the town's two supermarkets and the High Street, already operates within significant physical constraints and offers limited scope for further improvements to traffic flow.

64. The junction lies within, or immediately adjacent to, the Saxmundham Conservation Area, meaning that more substantial physical alterations are unlikely to be practicable without causing unacceptable harm to the historic environment.

65. In addition, the narrow pinch point at Chantry Road presents an existing constraint for both pedestrians and vehicles. The Town Council also considers that the Transport Impact Assessment does not accurately describe the existing pedestrian environment on Chantry Road. The TIA states that *"Chantry Road features a footway on either side of the carriageway, with a more narrowed footway on the southern extent on approach to the crossroads."* In reality, there is no footway on the southern side for a substantial section between the crossroads and the pharmacy car park. Thereafter, the footway is narrow, whilst on the northern side the footway is also of substandard width. The carriageway itself narrows significantly at the pinch point, requiring the traffic signals to operate one direction at a time. These existing constraints should be accurately reflected in the assessment and taken into account when considering the effects of additional traffic generated by the proposed development.

66. The Town Council further notes that Suffolk County Council Highways has questioned the applicant's assessment of the South Entrance/Church Street/Chantry Road junction, expressing concern that it appears to underestimate existing conditions and traffic impacts when compared with the Sizewell C assessments, and has indicated that it wishes to compare the applicant's work against a separate detailed assessment currently being commissioned.

67. Many residents already report increasing congestion within the town centre. This is consistent with the findings of the Sizewell C Consolidated Transport Assessment (CTA), which states that the B1121/B1119 signal-controlled junction is already operating over capacity during the morning peak period (08:00–09:00) and is expected to operate over capacity during additional periods over time. The CTA also notes that these modelling results assume that the traffic signals are operating with cycle times of up to 90 seconds during the busiest periods. In addition, the CTA evidences increasing queue lengths at the junction over time.

68. The Town Council does not consider that the Transport Impact Assessment has adequately addressed this existing evidence. It is therefore concerned that additional traffic generated by the proposed Garden Neighbourhood, when combined with traffic associated with Sizewell C and other NSIPs, could further exacerbate congestion, delay and highway safety issues within the town centre unless effective mitigation measures are identified and secured.

69. The extent to which traffic generated by the proposed development will use Rendham Road/Chantry Road or the B1121 South Entrance to access Saxmundham town centre remains unclear. The Town Council does not consider the Transport Impact Assessment to provide a sufficiently robust assessment of these traffic movements and is concerned that it is likely to underestimate the number of additional vehicle trips using these routes. Consequently, the assessment may also underestimate the potential for increased congestion, queuing and delay at the town centre signal-controlled junction.

70. The Town Council therefore considers that the likely effects of additional development traffic on Saxmundham's town centre highway network require further analysis. This should include a more robust assessment of traffic distribution, junction performance and queue lengths, taking proper account of cumulative traffic associated with the proposed development and the NSIPs.

71. A further significant uncertainty relates to the extent to which the proposed roadside services development on the A12 will attract trips from existing Saxmundham residents to facilities such as the proposed fast-food restaurants, petrol filling station and other commercial uses. Any such reassignment or generation of trips would increase traffic on the A12 and place additional pressure on the A12/Rendham Road junction, the existing safety and operational concerns of which are highlighted above.

72. The Town Council also questions the assumptions used within the TIA in relation to the proposed roadside services. In particular, further justification should be provided for the assumptions relating to the proportion of pass-by traffic and newly generated or diverted trips associated with the proposed petrol filling station. Given that Saxmundham is currently served by only one relatively small filling station, it is reasonable to expect that a proportion of existing residents would make specific journeys to the new facility. The Transport Impact Assessment should therefore include sensitivity testing of alternative trip-generation assumptions.

73. In addition, the commercial and employment areas within the development are likely to generate further vehicle movements by existing Saxmundham residents travelling to and from work. The Town Council does not consider that the cumulative impact of these additional local

journeys has been adequately assessed within the Transport Impact Assessment and believes that further analysis is required.

Active Travel and Travel Sustainability

74. The provision and use of public transport, both bus and rail, will be a key element of a sustainable transport strategy for the proposed Garden Neighbourhood. The Town Council fully endorses the comments made by Active Travel England, in its formal response to the application dated 8 July 2026, regarding the importance of sustainable transport provision.

75. The Town Council recognises the challenges associated with the largely deregulated bus network. Nevertheless, this should not preclude the preparation of a comprehensive public transport strategy, supported by appropriate commitments from the developer and relevant transport providers. Such a strategy should be prepared and agreed before outline planning permission is granted, demonstrating how the development will be effectively served by public transport from the outset and throughout its phased delivery.

76. The Town Council has consistently struggled to understand how a development located on the edge of Saxmundham, with a single vehicular access orientated away from the town, can realistically achieve a sustainable pattern of travel. For this reason, the Town Council has consistently argued for the maximum possible number of pedestrian and cycle links between the Garden Neighbourhood and the existing town and appreciates the willingness of the applicant to consider and incorporate a number of these connections.

77. However, the projected modal split remains disappointing, albeit probably realistic. Table 5.8 of the Transport Impact Assessment indicates that, during the morning peak period, approximately 87% of journeys are expected to be made by private car, with only 13% by non-car modes. Whilst the TIA states that opportunities to reduce car dependency will be explored further, the Town Council considers that this is a fundamental aspect of the development's sustainability and should not be deferred to the reserved matters stage.

78. The Town Council notes that Table 3.6 measures distances from the centre of the proposed residential development to key services and facilities within Saxmundham. No equivalent assessment has been provided for the proposed employment land to the west of the A12. The Town Council therefore questions the statement in paragraph 3.30 of the Transport Impact Assessment that much of the services and facilities within Saxmundham are within walking and cycling distance of the proposed development and that travel behaviour could therefore shift towards more sustainable modes. Given the separation of the employment area from the town centre by the A12, the applicant should justify this conclusion and demonstrate how sustainable travel to and from that part of the development will be achieved.

79. The Town Council is firmly of the view that measures to achieve a meaningful modal shift should be fully explored, agreed and secured before outline planning permission is granted. The transport strategy should demonstrate, through specific and deliverable commitments, how reliance on the private car will be reduced over the lifetime of the development.

80. These concerns are consistent with those raised by Suffolk County Council Highways, which has identified significant deficiencies in the submitted Sustainable Travel Strategy and requested further detail on off-site walking and cycling improvements, public transport, cycle infrastructure and connectivity to the town centre and railway station.

81. The Town Council also notes that Active Travel England has adopted a national objective for 50% of urban journeys to be made by walking, wheeling or cycling by 2030. The predicted modal split for the proposed development falls well short of this ambition and reinforces the need for a stronger and more comprehensive sustainable transport strategy.

Economic implications and impacts on the town's economy

82. An increase in Saxmundham's population of around 35% would normally be expected to generate a substantial increase in spending within the local economy. However, because of the location of the Garden Neighbourhood and its lack of direct vehicular links to the town centre, it is currently unclear what level of economic benefit the town centre can reasonably expect to receive. Residents may instead choose to access supermarkets, restaurants and other facilities

elsewhere via the A12, without entering Saxmundham town centre.

83. The proposed roadside services development introduces a further area of uncertainty. Depending on the operators ultimately occupying the site and the design and nature of the premises, the proposed eateries and other commercial uses could attract significant custom from residents of the Garden Neighbourhood. For many households, the roadside services area will be more conveniently located than equivalent businesses in the town centre. If this occurs, much of the expenditure generated by the new population may be diverted away from Saxmundham's existing businesses, limiting or negating the economic benefits that would normally be expected from a development of this scale.

84. At present, the application provides only indicative information regarding the nature of the proposed roadside services, including the food and beverage operators that may occupy the site. This makes it difficult to assess the likely impact on Saxmundham's existing businesses and the vitality and viability of the town centre.

85. The Town Council therefore considers that, before the outline application is determined, a comprehensive assessment should be undertaken of the likely economic effects of the development as a whole, including the roadside services area. This assessment should evaluate both the potential positive and negative impacts on Saxmundham's local economy, including the vitality and viability of the town centre.

86. Should the assessment identify that the proposed development, and in particular the roadside services element, is likely to divert trade from Saxmundham town centre or otherwise adversely affect its vitality and viability, the Town Council considers that appropriate mitigation should be secured through the planning process. This should include financial contributions from the developer towards measures that promote and strengthen the town centre economy, improve connectivity between the Garden Neighbourhood and the High Street, and encourage new residents and visitors to use Saxmundham's existing businesses and services.

Comments on Specific Elements of the Masterplan

87. The Town Council's comments to this point have focused primarily on the wider implications of the proposed Garden Neighbourhood for Saxmundham and the surrounding area. The Town Council now turns to a number of the specific on-site proposals contained within the Masterplan.

88. Throughout the evolution of the Masterplan, the Town Council and its Neighbourhood Plan Steering Group have sought to work constructively with the applicant to help achieve the best possible outcome for both the proposed development and the town, should planning permission ultimately be granted. The Town Council wishes to acknowledge and express its appreciation for the constructive engagement and cooperation shown by Pigeon in the course of the numerous meetings and workshops held to discuss the various elements of the Masterplan.

89. The comments that follow should therefore be read in the context of that collaborative approach. They are intended to assist in improving the quality, functionality and long-term sustainability of the development, whilst reflecting the interests of both future residents and the existing community.

Principal Garden Neighbourhood (Housing and Community Uses)

90. The Town Council has worked closely with Pigeon and officers of East Suffolk Council on the layout, connectivity and design of this principal part of the Garden Neighbourhood, between the A12 and the railway line. This area will accommodate the proposed housing, together with the new primary school, early years provision and a range of community facilities.

91. Throughout the design process, the Town Council's objective has been to ensure that the development reflects modern Garden City principles and that the Garden Neighbourhood genuinely fulfils the aspirations implied by its title. Subject to the detailed matters identified elsewhere in this representation, the Town Council raises no objection to the overall layout of this part of the Masterplan or to the proposed locations of its principal elements.

The Town Council particularly welcomes:

(a) the proposed pedestrian and cycle 'spine' route running alongside the existing hedgerow, providing a continuous connection through the site from the north-east, via the new access through the cemetery, to the south-west, where a new signal-controlled crossing of the A12 will provide access to the existing public rights of way network and the countryside beyond;

(b) the improved proposals for connectivity between the Garden Neighbourhood and the existing town, including the new pedestrian and cycle route through the cemetery, providing links to the railway station, the town centre and other key destinations;

(c) the location of the proposed primary school towards the northern part of the site, enabling it to serve both the existing and future communities whilst minimising unnecessary vehicle movements across the A12; and

(d) the location of the proposed community hub and children's play facilities adjacent to the primary school, creating a logical community focus within the development and encouraging opportunities for shared use and community interaction.

Southern SANG and Open Space (Benhall)

92. As previously stated, the Town Council raises no objection to the proposals for this part of the site. The Masterplan appropriately excludes built development from this area and instead proposes SANG, public open space and allotments. The Town Council supports these uses, which are consistent with the site's location and can make a valuable contribution to the overall green infrastructure and recreational provision within the Garden Neighbourhood.

Eastern SANG and Open Space

93. The Town Council has consistently advocated for part of The Layers to be incorporated within the Suitable Alternative Natural Greenspace (SANG) and open space provision, believing that this would deliver a better outcome for the Garden Neighbourhood and for Saxmundham as a whole.

94. The Town Council notes, however, that Natural England supports the proposed provision of three SANGs with a combined area of 15.55 hectares and is satisfied that all dwellings will be within 400 metres of a SANG access point. Natural England also notes that the proposed green spine through the centre of the development will improve accessibility to the SANGs and provide connections between the Garden Neighbourhood and Saxmundham.

95. In light of Natural England's advice, the Town Council raises no objection to the proposed SANG provision, the majority of which is located on land to the east of the railway. The Town Council also supports Natural England's recommendation that a planning condition should secure the maintenance and management of the SANGs, associated green spaces and footpaths for the lifetime of the development.

96. The Town Council has consistently raised questions regarding the future ownership, maintenance and long-term management of these areas. Whilst the principle of the proposed provision is supported, the governance and stewardship arrangements should be clearly established before planning permission is granted to ensure that these important green infrastructure assets are properly maintained in perpetuity.

97. The Town Council welcomes the ecological enhancements proposed as part of the Garden Neighbourhood, including the provision of SANG, green corridors, habitat creation and Biodiversity Net Gain. However, the Town Council notes that East Suffolk Council's Ecology Team has concluded that further information is required before it can support the application.

Ecology

98. The Town Council notes in particular the Ecology Team's concerns regarding the detailed design, accessibility and long-term delivery of the proposed SANG. These include the need to secure the phasing of SANG provision alongside residential development, clarification of the future of the Kiln Lane level crossing to ensure continued accessibility, and appropriate arrangements for the long-term management of the SANG and associated green infrastructure. The Town Council shares these concerns, particularly as the effectiveness of the SANG is

fundamental to the Habitats Regulations Assessment and the mitigation of recreational impacts on internationally designated wildlife sites.

99. The Town Council further notes that East Suffolk Council's Ecology Team has identified a number of outstanding ecological matters requiring further assessment or mitigation before the application can be determined. These include the submission of a hedgerow management plan, a robust mitigation strategy for skylark and other farmland birds affected by the loss of breeding habitat, clarification of badger survey information, and further consideration of hazel dormice, including whether additional surveys and species-specific mitigation are required. Whilst the creation of SANG is welcomed, the Town Council considers that recreational greenspace cannot automatically be assumed to replace breeding habitat for species associated with open farmland, and any mitigation strategy should clearly demonstrate how these species will be protected and supported in the long term.

100. The Town Council also considers it essential that the ecological enhancements proposed for the development are secured and maintained in the long term. This should include appropriate Landscape and Ecological Management Plans, Habitat Management and Monitoring Plans, sensitive lighting, ecological enhancement measures and long-term stewardship arrangements to ensure that Biodiversity Net Gain, habitat connectivity and ecological resilience are delivered throughout the lifetime of the development.

Employment Land

101. As the proposed employment land forms part of the Local Plan allocation under Policy SCLP12.29, the Town Council raises no objection in principle to this element of the development.

102. However, the Town Council wishes to emphasise the purpose for which this land was allocated. Paragraph 12.303 of the Local Plan states:

“New employment opportunities are limited in the north of the plan area and the creation of new employment land targeted at start up enterprises or to provide grow on space for existing businesses will be encouraged. The design and layout of employment

uses will need to be appropriate to their location, particularly when viewed from rural areas to the west.”

The Town Council considers it important that the employment land fulfils this original objective by supporting local employment opportunities for residents of the Garden Neighbourhood and the wider area. It is concerned to avoid a situation in which the site is developed for a single large warehouse or similar use with relatively low employment density, which would not reflect the intentions of the Local Plan.

103. The Town Council would therefore welcome further discussions with the applicant and the Local Planning Authority to ensure that the employment land is brought forward in a manner that delivers the objectives of Policy SCLP12.29. Planning conditions or other mechanisms should be used to secure a form of development that promotes start-up businesses, business growth and high-quality local employment opportunities.

Roadside Services Land

104. The Town Council has set out its detailed concerns regarding the proposed roadside services development on this site earlier in this representation and does not consider that, in its current form, this element of the outline application is consistent with the character, purpose or objectives of the Garden Neighbourhood.

105. The proposals for this site remain insufficiently defined to enable their likely impacts to be properly assessed. The Town Council would expect any such development to demonstrate clear planning and community benefits for Saxmundham that outweigh the harm arising from its location between the open countryside to the west and the proposed residential neighbourhood to the east. In the Town Council's view, those benefits have not yet been demonstrated.

106. The Town Council is also very concerned that extending commercial development west of the A12 beyond the employment land specifically allocated in the adopted Local Plan would increase pressure for further built development on adjoining countryside sites. Whilst each future planning application would need to be determined on its own merits, the Council considers that this proposal would make it progressively more difficult to maintain the clear western extent of development envisaged by the Local Plan and avoid further encroachment into

the surrounding countryside.

107. Should the Local Planning Authority nevertheless be minded to grant planning permission for or to include this element of the development, the Town Council considers that robust planning conditions and, where appropriate, planning obligations should be imposed to protect the amenity of existing and future residents. These should include controls over hours of operation, external lighting, noise, servicing and deliveries, landscaping, and any other measures necessary to minimise the impact of the development on its surroundings.

Biodiversity Net Gain Land

108. The Town Council raises no objection to the use of this site for Biodiversity Net Gain purposes. However, the concerns expressed above in relation to the Suitable Alternative Natural Greenspace (SANG) are equally applicable here. In particular, the future ownership, maintenance, management and long-term stewardship of the site should be clearly established before planning permission is granted, to ensure that the Biodiversity Net Gain objectives are secured and delivered in perpetuity.

Conclusion

109. Saxmundham Town Council has consistently supported the principle of planned growth in the town through the adopted Local Plan and has worked constructively over a number of years with East Suffolk Council, the applicant and other stakeholders to help shape a Garden Neighbourhood that reflects Garden City principles and responds positively to the aspirations of existing and future residents.

110. The Town Council welcomes many aspects of the evolving Masterplan, including the improved pedestrian and cycle connectivity, the location of the proposed primary school and community hub, the enhanced green infrastructure and the significant efforts that have been made to improve the overall quality of the development through engagement with the Town Council and its Neighbourhood Plan Steering Group.

111. However, the Town Council considers that the outline planning application, as currently submitted, does not yet provide sufficient certainty that the development can be delivered in a manner that is sustainable, properly supported by infrastructure, and fully integrated with the existing town. Significant issues remain outstanding in relation to transport, healthcare provision, wastewater infrastructure, ecology, sustainable travel and the long-term delivery of essential infrastructure and sustainable travel.

112. The Town Council also objects to the proposed roadside services development. It considers that this element of the application is not supported by the adopted development plan, has not been justified by evidence of need, and would introduce adverse impacts that have not been adequately assessed. The Town Council therefore considers that this element of the application should not be granted.

113. The Town Council therefore requests that the Local Planning Authority gives full weight to the matters set out in this representation and ensures that the outstanding issues identified by the Town Council and statutory consultees are satisfactorily resolved before determining the application. Should planning permission ultimately be granted, the Town Council considers it essential that robust planning conditions, planning obligations and infrastructure delivery mechanisms are secured to ensure that the development is implemented in accordance with the adopted Local Plan, national planning policy and the long-term interests of Saxmundham and its communities.