HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:

Hopkins Homes

In respect of:

Matter 3 Development Allocations (Policy SCLP12.1 Neighbourhood Plans)

Date:

July 2019

Document Reference:

GA/ EW/ 05017/ S0005
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of our client Hopkins Homes in respect of Matter 3 Development Allocations (Policy SCLP12.1 Neighbourhood Plans) of the Inspector’s Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan.

1.2 The Statement is intended to assist the Inspector’s consideration of the legal compliance and soundness of the Plan and will form the basis of the discussion at the Examination Hearing session on 3rd September 2019.

2. ISSUE – ARE THE PROPOSED AREA SPECIFIC STRATEGIES, ALLOCATIONS AND POLICIES JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

Question 3.2
Would the policy be effective in bringing development forward in Leiston? What is the present planning status of the consented sites in Leiston allocated in the Neighbourhood Plan SA1, SA3, SA4?

2.1 Policy SCLP12.1 relies on upon a review of the Leiston Neighbourhood Plan, which was made in March 2017 with a plan period to 2029, to deliver 100 additional dwellings in the town beyond 2029. At present however we understand that there are no plans to review the Leiston Neighbourhood Plan pending the outcome of the Local Plan Examination and, more specifically, the outcome of the ongoing consultations into Sizewell C, which will generate a significant housing need in the area from the anticipated 6,100-8,500 workers with proposals for the proposed accommodation campus still uncertain. The fourth Sizewell C consultation runs from 18th July to 27th September 2019.

2.2 The Local Plan recognises in the Strategy for Leiston at paragraph 12.27 that the Sizewell nuclear power station has an influence on Leiston and over the Plan period and that nationally significant decisions made in respect of Sizewell C or other major energy projects will have impacts locally which the Neighbourhood Plan (or Local Plan) will seek to mitigate in future revisions. However, there is no guarantee that a review of the Neighbourhood Plan will occur within the Local Plan period or indeed if it did, if it would be able to include site allocations to deliver the identified level of growth identified in the Local Plan or that resulting from Sizewell C. A Neighbourhood Plan is therefore not considered to be the correct tool to deal with such strategic growth.

2.3 Paragraph 12.6 of the Local Plan states that where positive strategies for the delivery of housing are not forthcoming in a timely way through Neighbourhood Plans, the Council may consider it is
appropriate to allocate land for housing through a future Local Plan review. However, this would not be until 2036 and there would therefore be an immediate shortfall of 100 dwellings in the Council’s supply.

2.4 It is therefore considered that the policy would not be effective in bringing forward development in Leiston and that the Local Plan’s strategy is considered unsound in that it would fail to be effective in meeting the area’s objectively assessed needs.

2.5 Housing delivery in Leiston is already delayed as the majority of sites allocated for development in the made Neighbourhood Plan have to date failed to deliver. The Leiston Neighbourhood Plan allocates four sites for residential development as detailed below:

- Land at Highbury Cottages, Saxmundham Road for approximately 150 dwellings (Policy SA1)
- Land at Red House Lane for approximately 70 dwellings (Policy SA2)
- Land to the rear of St Margaret’s Crescent for approximately 70 dwellings (Policy SA3)
- Land at Abbey Road for approximately 75 dwellings and 2,000m² of employment floorspace (Policy SA4)

2.6 The Hopkins Homes site at Red House Lane (Policy SA2) benefits from full planning permission for 65 dwellings (reference DC/17/1605/FUL) approved in March 2018 which is under construction and now partly occupied.

2.7 Policy SA1 is subject to an outline planning consent (reference DC/16/1961/OUT) for up to 187 dwellings approved on 21st June 2017. The site is subject to a recently submitted reserved matters application (DC/19/1883/ARM) made by Persimmon Homes Suffolk/Charles Church Suffolk. However, there are currently understood to be a number of technical issues outstanding and unresolved objections to the scheme which are likely to delay the determination of the application and therefore the delivery of the site. These relate principally to drainage and highways and it is understood that additional work is being undertaken to seek to address objections from the Local Highways Authority, LLFA and Environment Agency. There is also local objection in relation to the removal of the frontage hedgerow and a number of design concerns.

2.8 Policy SA3 is subject to an outline planning consent (DC/16/2104/OUT) for up to 77 dwellings which was approved on 29th June 2017. However, no reserved matters applications have been submitted and we understand that 3 potential sales of the site to different developers have fallen through. The outline application will expire in June 2020.

2.9 Policy SA4 is subject to an outline planning consent (DC/16/1322/OUT) for 100 new residential units with employment floorspace and family orientated public house/restaurant approved on 7th June 2017.
However, no reserved matters applications have been submitted and we understand that there has been little developer interest in the site. The outline application will expire in June 2020.

2.10 The Hopkins Homes Site SA1 is therefore the only one allocated within the Neighbourhood Plan which is actually delivering housing. This amounts to 65 dwellings out of a total of 365 dwellings allocated amounting to just 18%.

2.11 It is clear from the above that the current Neighbourhood Plan sites have failed to deliver the housing required in Leiston currently and there is therefore a need for sites of a strategic nature to be allocated within Neighbourhood Plan areas to provide more certainty going forward that there will be a sufficient supply of land to meet current and emerging housing needs.

2.12 In this regard, Hopkins Homes' additional land at Red House Lane (site plan below), directly adjacent to the land allocated under Policy SA2 and being delivered as part of application reference DC/17/1605/FUL forms a suitable, deliverable and sustainable option for housing development which can delivered promptly as a seamless transition from the current development in order to facilitate continued sustainable growth in Leiston.
HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:
Hopkins Homes

In respect of:
Matter 3 Development Allocations (Policy SCLP12.29 South Saxmundham Garden Neighbourhood)

Date:
July 2019

Document Reference:
GA/EW/05017/50006
1.0 INTRODUCTION AND BACKGROUND

1.1 This Hearing Statement has been prepared on behalf of our client Hopkins Homes in respect of Matter 3 Development Allocations (Policy SCLP12.29 South Saxmundham Garden Neighbourhood) of the Inspector's Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan.

1.2 Representations made on behalf of Hopkins Homes to the First Draft Local Plan (attached at Appendix 1) supported the deliverability of the draft policy, however such support was not able to be forthcoming in their Final Draft representations (attached at Appendix 2) on the basis of changes made between the two versions. The indicative masterplans associated with the policy at each stage are provided below for ease of reference (Plan 1 and Plan 2).

1.3 Whilst it is acknowledged that the masterplan is indicative, the fact that it is included within the Plan clearly demonstrates how the Council expects the site to be developed.

1.4 The changes are considered to render the policy undeliverable and jeopardise the soundness of the Plan in the context of paragraph 35 of the NPPF. This is by reason of the inclusion of land promoted by Hopkins Homes as formal/informal open space (SANG) which would fail to be brought forward for such use as Hopkins Homes and the landowner are only interested in developing their site for housing/mixed uses and therefore the allocation would not be able to deliver the quantum of development envisaged, it being served by insufficient SANG. In addition, the breach of the A12 for employment would result in landscape harm and a single point of access from the A12 would create an isolated development with no appropriate sustainable connectivity into Saxmundham.

1.5 In response, a further alternative indicative masterplan was presented by Hopkins Homes (Plan 3 below) which proposed the reversion of the indicative masterplan to that shown at the First Draft stage along with the provision of additional land to the east of South Entrance under Hopkins Homes’ control to deliver an over provision of SANG.

1.6 Since the submission of the Local Plan for Examination representations made on behalf of Pigeon Capital Management, promoters of the remaining allocation, have been made publicly available which include a further alternative indicative masterplan. A Landscape Appraisal Briefing Note by IDP (Appendix 3) and a Transport Technical Note by WYG (Appendix 4) have been prepared in response and are referred to in this Statement where relevant.
Plan 1 – First Draft Local Plan Indicative Masterplan

Plan 2 – Final Draft Local Plan Indicative Masterplan

Plan 3 – Hopkins Homes’ suggested changes to Indicative Masterplan
1.7 It was confirmed that the changes to the First Draft indicative masterplan arose as a result of a standalone Heritage Impact Assessment (Examination Document Reference D19) and the identification in the Habitats Regulations Assessment (Examination Document Reference A4) that the allocation would require on-site SANG provision given the number of dwellings proposed.

1.8 In respect of heritage, Hopkins Homes’ representations have confirmed:

- The Council’s Interim Sustainability Appraisal (Examination Document Reference B6) produced when the land was included for mixed use states that the policy could be delivered with ‘no effect’ on heritage;

- In their representations to the First Draft Local Plan, Historic England did not object to the policy or specifically preclude development on the Hopkins Homes land, rather raised concern regarding a lack of a Heritage Impact Assessment. In their comments on the Final Draft, Historic England did not provide any substantive comment owing to the fact that the subsequently prepared Heritage Impact Assessment had not been reviewed;

- The Heritage Review prepared by Barton Willmore for Hopkins Homes (contained within the Final Draft representations at Appendix 2) took into account the Council’s Heritage Impact Assessment and third party comments and confirmed that ‘With embedded mitigation secured through policy wording, the scale of harm is considered in principle to be capable of being demonstrably outweighed by public benefits arising from the scheme and does not present a strong reason to restrict development in this location at this stage’ (paragraph 4.8). Therefore, it is within the Council’s control to include the Hopkins Homes land for development based on weighing up of the harms and benefits in accordance with paragraph 196 of the NPPF.

1.9 It is noted that Historic England are not scheduled to attend the Examination Hearing session for this policy indicating that there are no fundamental concerns.

1.10 Neither the Council’s Final Draft or Pigeon’s indicative masterplans provide the requisite quantum of SANG to support the scale of development proposed. The Hopkins Homes proposals however can deliver SANG exceeding the relevant standards in a comprehensive manner and a more accessible location which would result in significant landscape benefits.

1.11 In addition to the above, the Hopkins Homes proposal is the only one which can enable the sustainable delivery of the allocation, being one of the largest in the Plan, in line with its objectives along with other significant benefits specifically:
• The delivery of the primary school and early years provision in an appropriate and accessible location relative to the existing town which can come forward as a first phase early in the Plan period;

• The delivery of c.200 dwellings promptly as a first phase;

• Provision of a separate vehicular access point onto the highly accessible B1121 South Entrance to provide appropriate sustainable connectivity into Saxmundham and reduce the risk of an adverse impact on highway safety on the A12;

• The delivery of employment land within body of the allocation, preventing the need to breach the A12;

• The provision of significant heritage benefits through an area of restored historic parkland.

• A continuation of build from Hopkins Homes’ current development to the east of Saxmundham in order to deliver sustainable growth which can be accommodated without harm to the significance of heritage assets or the receiving landscape character.

1.12 It is acknowledged there are currently three distinct and conflicting indicative masterplans proposals in respect of the allocation. Hopkins Homes recognise the strategic importance of the allocation and therefore are prepared for and foresee further discussions with the key parties throughout the Examination process in this regard.
2. ISSUE – ARE THE PROPOSED AREA SPECIFIC STRATEGIES, ALLOCATIONS AND POLICIES JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

**Question 3.35**

Is the allocation of land for approximately 800 dwellings achievable within the area indicated for housing between the A12 road and railway line on the indicative draft masterplan?

2.1 No. On the basis that the Hopkins Homes land would not be released for SANG, the remainder of the allocation would be required to deliver this provision. The HRA (Examination Document Reference A4) identifies a requirement for a minimum of 8ha of SANG per 1,000 residents calculated on the basis of 2.4 residents per dwelling along with a 2.5km circular walk. The SANG requirement for 800 dwellings (1,920 residents) is therefore 15.36ha.

2.2 The area shown for informal/formal open space on the Final Draft indicative masterplan excluding Hopkins Homes land is approximately 9.5ha and therefore clearly insufficient to meet the requirements for the scale of development envisaged. The alternative masterplan promoted by Pigeon likewise fails to provide the requisite area of SANG, comprising 12ha with a potential further block of 3.4ha which is divorced from the wider allocation to the west of the A12.

2.3 Conversely, the Hopkins Homes proposals would enable the delivery of site wide SANG amounting to a significant over provision of 20ha along with the requisite 2.5km walk in a compressive manner and more accessible and usable location which could be provided first to allow the allocation to come forward in the early part of the Plan period.

2.4 The land shown for approximately 800 dwellings would also need to accommodate 2.2ha of land for the primary school, 0.13ha of land for a further early years setting and land for the community hub. Public open space would also need to be provided at 2.4ha per 1,000 people (Paragraph 8.12 of the Plan). Using the standard assumption of 2.4 people per dwelling, this would result in a requirement for a further 4.6ha of public open space.

2.5 The Final Draft masterplan relies on each parcel to deliver the necessary open space, which coupled with the additional policy requirements, would result in a density of development which would entirely incongruous with the prevailing character of the area. The Hopkins Homes masterplan however shows a significant overprovision of approximately 9ha of open space as a standalone element, along with the separate SANG which would allow for a far more appropriate layout within the allocation itself.
### Question 3.36

Is the indication of the area to the east of the A12 road for mixed use development justified given it would be used to provide open space?

2.6 Clarification on this question is awaited from the Programme Officer. We therefore reserve the right to comment further.

### Question 3.37

In the context of Policy SCLP3.3: Settlement Boundaries, is the definition of the settlement boundary to include land which would be solely used for informal/open space justified? Why is the proposed employment land outside of the settlement boundary?

2.7 Notwithstanding Hopkins Homes’ position that the land currently shown as SANG land should revert to being shown as suitable for mixed use, it is considered necessary and good practice to include SANG land within the defined settlement boundary. This should also be extended to include the Hopkins Homes land to the east of South Entrance. This will ensure that the SANG is under the control of the Council and whilst it would remain open, it would not amount to open countryside in the true definition being a man made, managed feature which would form an integral part of the allocation and the wider settlement.

2.8 With regard to the Inspector’s question on employment land, in the first instance it is Hopkins Homes’ position that the extent proposed is not justified. The Plan significantly over provides for employment land by some 80ha. The evidence base documents (The Ipswich Economic Area Employment Land Supply Assessment 2018, Examination Document Reference D2 and The Ipswich Economic Area Sector Needs Assessment 2017, Examination Document Reference Document D3) do not identify Saxmundham as a location for future employment growth, with the majority of new provision to be focused on Felixstowe, Woodbridge (Adastral Park) and Ipswich Eastern Fringe. There is furthermore no evidence to justify the 7ha of employment land proposed in the allocation.

2.9 Saxmundham contains an existing employment allocation at Carlton Park which is proposed to be re-allocated as Policy SCLP12.37. This confirms that 3ha of land remains vacant. This site is considered far better placed to meet any future employment needs of Saxmundham given the location relative to the settlement and its existing use.

2.10 It has been demonstrated in the representations contained at Appendix 2 that adverse landscape impacts would result from the proposed breach of the A12 as proposed in the Final Draft masterplan given that the settlement of Saxmundham is currently well contained with the road providing a sense of separation to the large area of open parkland to the west.
2.11 The proposals promoted by Pigeon would extend further the settlement beyond what would be considered logical or sustainable in landscape design terms through the provision of employment land as well as a site for a services for which there exists no justification. As confirmed in the Landscape Appraisal Briefing Note (Appendix 3), developing land west of the A12 would result in permanent losses of open arable fields and would urbanise area in an unprecedented way and has the potential to result in adverse effects on the special qualities of the local landscape. Given there is no justification for the proposed A12 services, the additional SANG land proposed adjoining it would be inaccessible which adds further weight to the fact that the Pigeon scheme cannot provide the necessary SANG.

2.12 Notwithstanding the position above, should employment land be considered justified, it is clear that the Hopkins Homes proposals can deliver this within the body of the allocation within the settlement boundary without breaching the A12.

2.13 If the Inspector does consider the employment land to be justified in its scale and location as currently proposed, the settlement boundary should be extended to include this land.

**Question 3.38**

*Would the provision of the SANG to the east of the railway be effective given the limited crossing points of the railway? Is the extent of land indicated for informal/formal open space to the east of the railway justified?*

2.14 As detailed in the answer to question 3.35, the principal concern remains that the quantum of SANG provided in the current Final Draft masterplan is insufficient to meet the needs of the allocation. Notwithstanding this, there exists the opportunity to cross the railway line with the ability to provide additional crossing points and as such the railway line does not form a barrier to the accessibility to the land. This is normal practice and Natural England have raised no objection in this regard. However, the situation proposed in the Final Draft masterplan would be substantially improved with the provision of SANG land to the east of South Entrance which would be better related to the existing town and accessible via the whole length of South Entrance.

**Question 3.39**

*Would the Policy give rise to coalescence with Benhall village?*

2.15 The Final Draft masterplan identifies that the allocation would not result in the actual coalescence with Benhall, however as a result of the changes from the First Draft stage, the extent of the allocation has moved further south towards the settlement. The alternative proposals promoted by Pigeon further extend the settlement as far south as Grays Lane and Kiln Lane. As confirmed in the
Landscape Appraisal Briefing Note (Appendix 3), these lanes and their surrounding fields have a strong rural character and form part of part of the setting to Benhall Village. Adverse effects on the visual amenity edge of Benhall village is therefore likely to occur. The elongated form of the extent of land promoted would create an exaggerated perception of the settlement especially in views from the east. It is not therefore considered that these proposals would be a defensible urban extension given the landscape and visual implications that are likely to arise.

2.16 The Hopkins Homes indicative masterplan represents a more suitable option in this regard by providing development within close proximity to the existing settlement edge and enabling a far larger gap to the village of Benhall to be maintained.

**Question 3.40**

*Would the Policy be effective in achieving the provision of required education facilities? Is it justified to include early years provision within both criteria a) and b)?*

2.17 Suffolk County Council have previously confirmed that the Hopkins Homes land would be best placed to deliver land for a primary school meeting all of their requirements in terms of size, shape and accessibility to the existing settlement. The Hopkins Homes land would enable the primary school to be delivered early in the Plan period and provide direct sustainable transport linkages to South Entrance and therefore the wider town which would not be possible with the Final Draft masterplan or the Pigeon proposals.

2.18 It is considered justified to include early years provision within both criteria given the scale of development and the timescale over which it would come forward which the Hopkins Homes land can appropriately deliver.

**Question 3.41**

*Are there any factors which would mean that the site is not ‘deliverable’ or ‘developable’ as per the definitions in the Framework?*

2.19 This question has been addressed in the answers above. As drafted, it is considered that the policy is undeliverable and undevelopable and that the Hopkins Homes land is a fundamental component and an essential delivery mechanism to delivering the growth required in Saxmundham in order to meet the national objective of contributing to the achievement of sustainable development. Hopkins Homes is the largest provider of new homes in the District and has delivered the bulk of recent new development in Saxmundham. The land is available now, offers a suitable location for development now and is achievable with a realistic prospect that housing will be delivered on the site within five years.
Question 3.42
Is it justified that the site is accessed via a single vehicular access?

2.20 No. As confirmed in the Transport Technical Note prepared by WYG submitted with the First Draft representations (Appendix 1), the policy as drafted would result in an isolated scheme for 800 dwellings accessed off the A12 with no appropriate sustainable connectivity into the centre of Saxmundham which is inappropriate due to the isolation from the town and the significant impact on other access points into the town.

2.21 Furthermore, as confirmed in the Transport Technical Note (Appendix 4) developing solely the land promoted by Pigeon cannot result in a development with seamless connections to the existing communities by virtue of the only vehicular access being a new one onto the A12. Walking and cycling routes between the proposed site and the existing facilities in Saxmundham would be convoluted, long and require navigation of some sections of sub-standard footways and narrow streets.

2.22 A review of the sustainable accessibility of the site demonstrates that the best opportunities for sustainable links between the site and Saxmundham are via South Entrance and that utilising the Hopkins Homes land is the only way to deliver this. A review of highway safety in the area also illustrates that South Entrance has a better safety record than the A12 and providing a second access to the site off South Entrance would reduce the risk of an adverse impact on highway safety.

2.23 In summary a single vehicular access is not justified and it is considered that a separate vehicular access point onto the B1121 South Entrance, in addition to the access onto the A12, would offer a favourable solution which would only be deliverable by the development of the Hopkins Homes land.

Question 3.43
Would the Policy be effective in addressing the needs for off-site infrastructure requirements arising from the development?

2.24 It is considered that the policy wording is sufficient to positively address the needs for off-site infrastructure. Hopkins Homes would agree to make reasonable and justified contributions related to requirements arising from the development.

General Question
Is the site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential constraints?

2.25 This general question has been addressed as part of our responses to the specific questions above.
**General Question**

*Are there any significant factors that indicate that the site should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?*

2.26 As detailed above, there are significant factors which indicate that the site should not be allocated in the manner as currently drafted however this can be positively resolved through the changes suggested.
Appendix 1
First Draft Local Plan Reps
Representations to Suffolk Coastal Local Plan First Draft
Policy SCLP12.26 South of Saxmundham Garden Neighbourhood

On behalf of our client Hopkins Homes Limited we wish to make representations to the current Suffolk Coastal Local Plan First Draft consultation following on from our previous submissions made to the Issues and Options Local Plan consultation in October 2017. Detailed representations have been made in our accompanying letter reference GA/EW/05017/L0008 in respect of the Local Plan housing number and a range of general policies. This submission relates specifically to the proposed Policy SCLP12.26 South of Saxmundham Garden Neighbourhood.

As the Local Plan is expected to be submitted for Examination after 24th January 2019, it will be required to be fully compliant with the revised National Planning Policy Framework (NPPF) in accordance with paragraph 214. Reference is made to the revised NPPF throughout the representations made where relevant and regard has been given to the tests of soundness for examining Local Plans as set out in paragraph 35.

Background
Policy SCLP12.26 South of Saxmundham Garden Neighbourhood identifies approximately 44ha of land to be developed as a Garden Neighbourhood to the south of Saxmundham. The allocation seeks to deliver an education led development comprising a primary school with early years provision, community facilities and employment land alongside up to 800 dwellings, the provision of green infrastructure, open space, retention of footpaths, enhancement of biodiversity networks and new vehicular access points off the A12 and the B1121.

The proposed allocation seeks to support the Strategy for Saxmundham (Policy SCLP12.25) for the settlement to continue to be a thriving retail, 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.
Hopkins Homes has a longstanding presence in Saxmundham having successfully delivered two housing sites to the north east of the town (planning application reference DC/14/1497/FUL for 170 dwellings including 56 affordable units and planning application C07/0362 for 145 dwellings including 49 affordable units) which have contributed significantly to the supply of affordable and market housing and public open space and have made positive contributions to local services through Section 106 payments to highways improvements, education, healthcare and libraries. Hopkins Homes also currently has an active planning application under consideration (planning application reference DC/18/0702/FUL) on the allocated site at land north east of Street Farm for a residential development of 59 dwellings including 19 affordable homes which is expected to be approved by the end of this year.

Hopkins Homes has an interest in part of the site proposed for allocation under Policy SCLP12.2 and has promoted the land for a number of years for residential development and a site for a new primary school with associated public open space and landscaping. Alongside this continued promotion, Hopkins Homes is now in the process of preparing a planning application for the land within their control for up to 225 residential dwellings (including 33% affordable), the provision of a site for a primary school and significant areas of green space.

A Development Framework Plan (shown below) and a suite of technical documents relating to highways, landscape, ecology, heritage, archaeology, trees and flood risk have been produced which identify the extent to which the site is developable and robustly demonstrate that it forms a suitable and deliverable housing site devoid of any insurmountable constraints.

The technical reports prepared to date in summary confirm:

- **Highways:** The site is located in a sustainable location within easy walking and cycling distance of key facilities and services in the town. Safe and suitable vehicular access can be provided to the site via South Entrance and opportunities to maximise the use of public transport, cycling and walking are available. Highways capacity assessments have been undertaken that demonstrate that development would not result in any residual cumulative impacts on the highways network that are severe.

- **Landscape:** A Landscape Visual Impact Assessment has confirmed that the site and receiving environment have the capacity to accommodate the proposals without significant harm to either landscape character or the visual environment with the implementation of a landscape mitigation strategy.

- **Ecology:** Surveys and Assessments have proposed mitigation for potential ecology impacts of the proposals including the provision of Suitable Alternative Natural Greenspace and new planting.

- **Heritage:** Given the site’s proximity to the Saxmundham Conservation Area and the Grade II listed Hurts Hall to the east, Hopkins Homes engaged with Historic England at an early stage. A Heritage Statement has been prepared which identifies and assesses any environmental effects on nearby heritage assets and sets out design and mitigation measures. The conclusion is that the proposals would result in some less than substantial harm to the significance of the Saxmundham Conservation Area and the Grade II listed Hurts Hall however this harm would be decisively outweighed by the very substantial public benefits flowing from the development. Hopkins Homes will undertake further consultation with Heritage England and liaise closely with stakeholders to develop proposals that minimise the impact on the significance of nearby heritage assets whilst maximising the delivery of public benefits for Saxmundham.
• **Archaeology:** There is no indication that the site contains archaeological remains that would prohibit development or would act as a major constraint on design and layout of new development.

• **Trees:** Development on the site is able to avoid impacting the site’s existing tree population and accordingly impact would be negligible.

• **Flood Risk:** The site is within Flood Risk Zone 1 and therefore suitable for all forms of development and investigations have confirmed that it can be sustainable drained for both surface and foul water.
As part of the preparation of the planning application, Hopkins Homes has also undertaken extensive pre-application discussions and consultation as summarised below:

- A formal pre-application advice request was submitted to Suffolk Coastal District Council on 25th April 2017 and a meeting was held with officers on 18th July 2017
- Meetings were held with Suffolk County Council as Local Education Authority in February and April 2017. This confirmed that an area of land can be provided on the Hopkins Homes land which meets all of the County’s requirements in terms of size (2.2ha), shape and accessibility being just 350m walk from the town centre. The County are supportive of proposals to bring forward a new primary school on the site and have not identified any other locations that they consider suitable to be able to meet this need. It is anticipated that Hopkins Homes would provide a serviced site for the primary school as well as a proportional contribution to its construction costs, with the remainder met by other development as it comes forward
- Meetings with Saxmundham Town Council were held on 19th June 2017 and 17th July 2017
- A formal pre-application advice request was submitted to Historic England by the project’s heritage consultants Turley in August 2017 and a meeting was held with them to discuss the proposals on 20th September 2017
- A newsletter was delivered to all properties in Saxmundham to provide the local community the opportunity to view the emerging scheme and provide their views

An Environmental Impact Assessment (EIA) Screening Request was submitted on 26th May 2017 and on 27th June 2017 the Council issued their Screening Opinion that an EIA was required. A request for a Secretary of State Screening Direction was submitted to the Planning Casework Unit on 1st August 2017. This confirmed that the proposed development was EIA development and must be accompanied by an Environmental Statement. It confirms that the site is not within a sensitive area, but concludes that, in view of the site’s proximity to designated heritage assets and the development’s size and permanence, it is likely to have significant effects on the historic environment and an EIA is required. However, since this time, land to the east of South Entrance previously promoted by Hopkins Homes to be used as managed parkland has been excluded from the proposals and the land to be allocated.

The above demonstrates that land under Hopkins Homes’ control is a suitable and sustainable option devoid of any insurmountable constraints to deliver part of the extent of the development required in the town. It is clear from the sites identified in The Draft Strategic Housing and Economic Land Availability Assessment (July 2018) that given the constrained nature of Saxmundham by reason of the surrounding landscape designations, flooding, highways or other land use constraints, the only realistic option for development is to the south of the town. Saxmundham has already grown significantly to its east in recent years and whilst two further sites have been put forward for consideration to the east, we consider there are constraints to their delivery and limitations to the contribution to housing supply as detailed below:

- **Site 435** is considered to be a highly unsustainable location for development due to its distance from the town centre, open landscape character and its narrow road frontage along Church Hill that would restrict the potential for a second highways access that would be required for the size of development proposed.
- **Site 559** which is a well-enclosed site that relates well to the existing built-up area, is within a short walk of the town centre and is relatively unconstrained in terms of highways access, ecology,
landscape, and heritage however only has an identified capacity of just 84 dwellings and would therefore only meet a small part of the requirement for Saxmundham.

On the basis of the above, we consider that the most sustainable strategy for delivering the required level of housing growth in Saxmundham is through the proposed Garden Neighbourhood. It is important to note the significant role that would be played by the Hopkins Homes land in delivering this growth through the provision land for a new primary school early to enable Saxmundham to fulfil its role as a key part of the A12 growth corridor.

Hopkins Homes therefore wish to support the proposed allocation and the related strategy for Saxmundham. Additional comments are provided below.

**Extent of the Allocation**

As shown below, the site plan in the draft Local Plan fails to identify the exact extent of the lower part of the allocation which lacks clarity and certainty.

*Change sought:* The exact extent of the land to be allocated should be defined in the Plan. The extent of the land under Hopkins Homes’ control is identified on the plan below for reference.

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**Local Plan site allocation map with extent of Hopkins Homes’ land interest shown edged in red**

**Delivery of the Allocation**

The proposed allocation is expected to be delivered through a masterplanned approach brought forward through landowner collaboration. However, given the various land ownerships within the allocation, this is not considered to be the most appropriate strategy to deliver sustainable development. The remaining land has been put forward by site promoters and would therefore need to be sold housebuilders before it come forward for development whereas this site is in single ownership and is wholly in the control of Hopkins Homes who
are able to develop the land promptly as a seamless transition from their current development to the east of the town in order to facilitate continued sustainable growth in Saxmundham.

Hopkins Homes is fully committed to delivering this available and achievable site in a prompt and timely manner in order to make a valuable contribution towards boosting the supply of housing in the District and allow for the early delivery of the primary school to the significant benefit of the town in meeting both over stretched current capacity and enabling Saxmundham to fulfil its role as a key part of the A12 growth corridor. Given the deliverability of the site detailed above, it is therefore able to come forward independently and quickly as a first phase of the allocation.

The Draft Plan includes an indicative draft masterplan to provide an initial indication of how the Garden Neighbourhood could be delivered. However, as illustrated below, the masterplan does not accurately reflect the extent of land which has been promoted by Hopkins Homes. Furthermore, the masterplan lacks clarity as it fails to define the actual extent of the allocation or how it could come forward in phases given the different land ownerships as detailed above.

![Indicative draft masterplan with land under the control of Hopkins Homes shown](image)

**Changes sought:** The policy should be amended to acknowledge the multiple landownerships within the allocation and therefore confirm that the land to the west of South Entrance (under the control of Hopkins Homes) can come forward independently as a first phase in the delivery of the allocation to provide land for a primary school and housing to boost the supply in the earlier part of the Plan period.

Specifically, the policy should be amended to require:

a) Provision of a primary school with early years’ provision in Phase 1;
i) Approximately 800 dwellings with approximately 200 dwellings in Phase 1

The indicative draft masterplan should be removed and replaced with a version which shows fixed boundaries and development phases (the Hopkins Homes land being Phase 1 to deliver land for a primary school and circa 200 houses).

We trust that these comments will be given the due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact me.

Yours faithfully

Geoff Armstrong
Director
Armstrong Rigg Planning
Direct Line: [Redacted]
Mobile: [Redacted]
Appendix 2

Final Draft Local Plan Reps
REPRESENTATIONS TO SUFFOLK COASTAL LOCAL PLAN
FINAL DRAFT

POLICY SCLP12.29
SOUTH SAXMUNDHAM GARDEN NEIGHBOURHOOD

On behalf of:
Hopkins Homes Limited

Date:
February 2019

Reference:
GA/ EW/ 05017/ S0001
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1.0 INTRODUCTION AND BACKGROUND

Introduction

1.1 This Statement has been prepared on behalf of our client Hopkins Homes Limited in response to the current Suffolk Coastal Local Plan Final Draft consultation in respect of the proposed Policy SCLP12.29 South Saxmundham Garden Neighbourhood following on from our previous submissions made to the Issues and Options consultation in October 2017 and First Draft Local Plan in September 2018.

1.2 The representations provide a background to the site’s promotion and consideration through the Local Plan process and confirm Hopkins Homes’ objection to the policy in its currently drafted form by reason of the unjustified inclusion of land under their control as formal/informal open space (Suitable Alternative Natural Greenspace) as opposed to mixed use development shown indicatively in the First Draft of the Plan; and the wider implications of this change.

1.3 The representations demonstrate that the policy, as drafted, would be undeliverable and accordingly would jeopardise the overall vision of the Plan being to contribute to and enhance a range of sustainable settlements and improve their economic, social and environmental wellbeing. In addition, the policy as drafted would have serious wider implications, particularly in terms of highways impact which are fully detailed in the representations. The representations also outline that it is considered premature to make such a change without fully understanding the implications and as drafted the policy prejudices what could be delivered on the site without considering all issues in the balance. In this regard Hopkins Homes support the principle of a development brief for the whole site to enable it to be delivered in a comprehensive and appropriate manner.

1.4 The policy as drafted is not considered to be ‘positively prepared’ on the basis that it would be unable to contribute towards meeting the area’s objectively assessed needs, ‘justified’ as it does not represent the most appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence, ‘effective’ as it would not be deliverable over the plan period or finally ‘consistent with national policy’ as it would fail to enable the delivery of sustainable development in accordance with the policies in the NPPF. On this basis the policy is considered to render the Plan unsound in the context of paragraph 35 of the NPPF.

1.5 The wider concerns set out above regarding the deliverability and implications of the emerging policy, and therefore its soundness, were discussed with the Council when it was first indicated that the policy was to be amended from that originally proposed in the First Draft Local Plan. These concerns were however unheeded and copies of the relevant evidence base documents to support
the alteration to the policy were not forthcoming at the time, despite numerous requests.

1.6 The representations have been prepared on the basis of a review of the available evidence base documents prepared by the Council and the land promoters of the remainder of the allocation and advice that Hopkins Homes has sought separately from professional advisors.

1.7 The representations demonstrate that it is unjustified and premature to remove land under Hopkins Homes’ control from being shown indicatively as suitable for mixed use development as in the First Draft Local Plan and that the policy as drafted prejudges the future of the development site without the benefit of a fully considered development brief. It will be confirmed that the change arose purely as a result of a standalone Heritage Impact Assessment prepared for the Council and indeed with the exception this matter, there is no evidence which confirms that development on the Hopkins Homes land would be harmful. Furthermore, the assessment of the site for its suitability for residential development has been positive in previous assessments undertaken by the Council.

1.8 As part of these representations, a Landscape Strategy Plan has been prepared by IDP to demonstrate the level of development which could be appropriately accommodated on land under Hopkins Homes’ control (Appendix 1). The following supporting documents are also submitted:

- Heritage Briefing Note prepared by Barton Willmore Planning LLP (Appendix 2)
- Transport Technical Note prepared by WYG (Appendix 3)
- Landscape Appraisal Briefing Note prepared by IDP (Appendix 4)

Previous Site Promotion

1.9 Hopkins Homes has an interest in part of the site proposed for allocation under Policy SCLP12.29 being to the west of the B1121 South Entrance and also has control of a wider area of land on the eastern side of South Entrance. The land has been promoted for a number of years for residential development and has been assessed by the Council throughout the Local Plan preparation process as Site 1012.

1.10 The land under Hopkins Homes’ control is identified on the plan below:
1.11 A key issue which arose from the Examination into the Suffolk Coastal Site Allocations and Area Specific Policies Document (adopted in January 2017) was the lack of primary school capacity in Saxmundham and that fact that a subsequent Plan would need to allocate sufficient housing to make an additional primary school sustainable. In this regard, discussions took place with Suffolk County Council in 2017 who confirmed that the Hopkins Homes land to the north west of South Entrance would be best placed to deliver a primary school, the site meeting all of the County’s requirements in terms of size, shape and accessibility to the settlement. There was also a preference to deliver this early in the next Plan period.

1.12 Alongside its continued promotion, in 2017 Hopkins Homes commenced preparation of an outline planning application for the land within their control for circa 225 dwellings with land for a primary school in an area to the west of South Entrance and an area of public parkland to the east of South Entrance. This involved pre-application discussions with the District Council and Parish Council which was generally positive. Following further discussions with the Council, and at their specific request, Hopkins Homes then agreed to put the application in abeyance and promote the site for allocation through the Local Plan process.

**First Draft Local Plan**

1.13 Policy SCLP12.26 of the First Draft Local Plan (July 2018) sought to deliver an education led development comprising a primary school with early years provision, community facilities and employment land alongside up to 800 dwellings, the provision of green infrastructure, open space,
retention of footpaths, enhancement of biodiversity networks and new vehicular access points off the A12 and the B1121. Hopkins Homes’ land interest to the west of South Entrance was shown on the emerging indicative masterplan for mixed use development along with land promoted by Pigeon Capital Management to the west of the railway line and to the east of the A12 for mixed use and employment. Vehicular accesses were shown off both the A12 and South Entrance.

Figure 2. Indicative masterplan from First Draft Local Plan

1.14 It is important to note that at this time the Suffolk Coastal Draft Strategic Housing and Economic Land Availability Assessment (July 2018) assessed the Hopkins Homes land (site reference 1012) as being potentially suitable, available and achievable for the delivery of 300 dwellings. There were no significant issues raised which would prevent the site coming forward for development. Matters to be addressed included access, flood risk and impacts on the historic environment however clearly those matters were not at the time considered insurmountable to affect the proposed allocation and could have adequately been dealt with through the planning application process. However, as detailed above in paragraph 1.12, the Council specifically requested that Hopkins Homes refrain from submitting a planning application and instead promote the site through the Local Plan process.

1.15 Furthermore, the Council’s Interim Sustainability Appraisal (July 2018) states under ‘Cultural Heritage - To conserve and where appropriate enhance areas and assets of historical and archaeological importance’ that the policy could be delivered with ‘no effect’ on heritage assets.
1.16 Hopkins Homes’ representations of September 2018 supported the emerging allocation but sought a minor amendment to the policy wording to ensure that land under their control could come forward independently as a first phase to allow the early delivery of land for a primary school and circa 200 houses.

1.17 In their representations to the First Draft Local Plan, Historic England did not object to the allocation, rather raised wider concerns that there was a lack of evidence through a Heritage Impact Assessment and subsequent exploration through policy and supporting text of historic environment considerations. The Education Authority supported the delivery of a primary school as part of the allocation.

1.18 Whilst some objection was to be expected in light of the scale of the proposed allocation, the level of opposition raised as part of the consultation into the First Draft Local Plan by the District and Town Council was somewhat surprising to Hopkins Homes given that this had not been expressed in pre-application discussions undertaken previously. Objections were also received from local residents and a number of local bodies, principally relating to landscape and heritage concerns.

1.19 The local action group ‘Leave the Layers Alone’ has suggested that the Hopkins Homes land is of historic value, due, in part, to its association with hosting the Suffolk Show. The group made an application to Historic England in April 2018 to have the land listed as a Registered Park and Garden of Special Historic Interest however this was invalidated in August 2018, on the basis that the land was not considered to meet the relevant criteria for such designation.

Final Draft Local Plan

1.20 It is considered that the strong level of objection noted above influenced the Council’s decision to alter the policy to its currently drafted form. Despite Hopkins Homes raising concerns in discussions with the Council when it was first indicated that the policy was to be amended, as noted above, the Council chose to proceed to propose significant changes to the allocation.

1.21 In this regard, Policy SCLP12.29 of the Final Draft Local Plan now illustrates land under Hopkins Homes’ control as formal/informal open space which would include the policy requirement for a significant area of Strategic Alternative Natural Greenspace (SANG) designed to mitigate impacts on European protects sites, rather than for mixed use development as before. The number of houses to be allocated remains at 800 with built development to be focused to the west of the railway line (land promoted by Pigeon Capital Management) and the main area for employment moved to the west of the A12. There is a single access proposed off the A12 and therefore limited connectivity to the rest of the town which will be considered subsequently.
1.22 The updated December 2018 SHELAA assessment for the Hopkins Homes land (reference 1012) continues to identify the site as potentially suitable and is assessed in a comparable manner as in the July 2018 document. The only change is that it is stated that consideration must be given to the November 2018 Heritage Impact Assessment which ‘
recommends against built development on the site.’ Notwithstanding this, the December 2018 Sustainability Appraisal (SA) reaches the same conclusion as previously, confirming that no negative effects would result in respect of heritage matters.

1.23 It is clear from the above that the Council’s SA and SHELAA, which remain current and part of the evidence base, do not specifically preclude development on the Hopkins Homes site, albeit identify that consideration will need to be given to heritage matters, which as detailed below can be the case.

1.24 It is considered that the Council’s justification for removing the Hopkins Homes land to be shown as being appropriate for development has arisen solely on the basis of heritage impact grounds supported by a standalone report. In our view this was commissioned retrospectively in light of the significant local objection raised. As detailed subsequently, this approach is entirely premature and unjustified.
2.0 REPRESENTATIONS

2.1 This section confirms Hopkins Homes’ objection to the policy in the form as drafted and demonstrates that the allocation as proposed would not be delivered and would therefore be unsound.

2.2 The comments are set out under the following headings:

- Deliverability
- Prematurity
- Connectivity (vehicular)
- Landscape Impact

Deliverability

2.3 Deliverability is a significant consideration with any proposed allocation, particularly given the updated NPPF published on 19th February 2019, which has clarified the glossary definition of ‘deliverable’ placing an onus on local planning authorities to demonstrate delivery to meet the tests of the definition in Annex 2. In this respect, Hopkins Homes is a housebuilder solely in control of the land which is in single ownership. Hopkins Homes is the largest provider of homes in the District and has delivered the bulk of new development in Saxmundham over the last 5 years and are able to develop the land promptly as a seamless transition from their current development to the east of the town in order to deliver continued sustainable growth in Saxmundham.

2.4 Fundamentally, Hopkins Homes and the landowner are only interested in developing their site for housing. There is an option on the land until at least 2027. The landowner will not release the site for its use as Suitable Alternative Natural Greenspace (SANG) as proposed as this would result in the land being sold at only a nominal increase in land value. The Council has been made aware of Hopkins Homes’ position in this regard but has seemingly discounted the concerns raised.

2.5 The need for on-site SANG as part of the allocation to mitigate the impact of additional visitors on nearby European sites has arisen since the First Draft Local Plan as a result of the publication of the Habitats Regulations Assessment (HRA) (December 2018). Hopkins Homes acknowledge that the provision of on-site SANG is an appropriate strategy.

2.6 On the basis that the Hopkins Homes land would not be brought forward for such use as set out above, the remainder of the allocation would therefore be required to deliver the requisite area SANG. In this respect, the HRA identifies a requirement for a minimum of 8ha per 1,000 residents calculated on the basis of 2.4 residents per dwelling along with a 2.5km circular walk. The SANG requirement for 800 dwellings (1,920 residents) is therefore 15.36ha. The remainder of the allocation is 9.5ha so is not sufficient to meet the SANG area requirements for 800 dwellings (15.36ha).
2.7 In addition to the above, the December 2018 SHELAA, assessed the land now shown on the indicative masterplan to deliver the 800 dwellings, community use and school (Site 714) as having an estimated dwelling yield of 495. This clearly falls far short of the 800 dwellings now proposed for this part of the site, along with the additional land requirements for the school, community hub, other mixed uses, new junction to the A12 and additional SANG land as detailed above.

2.8 The consequence of the above is that there would be implications for the deliverability of the whole allocation as the number of dwellings proposed would need to be reduced and there would be a necessity to find alternative sites in Saxmundham to deliver what will be a shortfall in housing at this late stage in the Plan’s preparation. This is of particular concern given that the allocation is one of the largest in the Plan and there will be a notable impact of Sizewell C within close proximity of Saxmundham which will generate a significant housing need and will put further pressure on the deliverability of sites going forward.

2.9 As drafted therefore there are significant concerns that the policy would not deliver the extent of development required and the Hopkins Homes land is therefore a fundamental component to achieve this.

2.10 The HRA does not set out a preferred location for the SANG and it is clear that it does not have to be on the Hopkins Homes land as proposed and can be delivered in another suitable location on the allocation or on nearby land. In this respect, it has been previously discussed with the Council that Hopkins Homes are prepared to offer site wide formal SANG on their land to the east of South Entrance, which would amount to some 20ha, an over provision against the HRA requirements. This land could be provided up front to allow the allocation to come forward in the early part of the Plan period, would represent a more accessible and usable location and would allow for a better layout within the allocation itself. In addition, the over provision will deliver SANG to accommodate any additional future growth in Saxmundham and surrounding areas.

2.11 Having regard to the above the Landscape Strategy Plan prepared by IDP attached at Appendix 1 shows indicatively how land to the east of South Entrance could be laid out as SANG land (20ha) with the requisite 2.5km circular walk provided which would provide a significant benefit.

**Prematurity**

**Heritage**

2.12 As detailed in above, it is considered that the decision to remove the Hopkins Homes land as mixed use development from the indicative masterplan shown at the First Draft Local Plan stage has arisen solely as a result of heritage concerns raised during the public consultation which promoted the retrospective production of a Heritage Impact Assessment (November 2018). This was not shared with Hopkins Homes, despite several requests and was only made available for review at the commencement of the
consultation into the Final Draft Local Plan.

2.13 It is important to reiterate that the Council’s Interim Sustainability Appraisal (July 2018) produced when the Hopkins land was included for development states under ‘Cultural Heritage - To conserve and where appropriate enhance areas and assets of historical and archaeological importance’ that the policy could be delivered with ‘no effect’ on heritage assets. The December 2018 version for the Final Draft reaches the same conclusion confirming that no negative effects have been raised in respect of heritage in this context.

2.14 In response, a Heritage Briefing Note has been produced by Barton Willmore Planning LLP (Appendix 2) which reviews the conclusions of the various heritage reports which have been prepared for the site to date and considers the potential of land under Hopkins Homes’ control to accommodate development in principle. A review of the heritage impacts that have potential to result from the development is provided which takes into account a series of the embedded mitigation measures that could be given policy protection in the final policy text/masterplan. Principally, these are:

- The retention of the entire area of the eastern parcel as open space to maintain an open setting to Hurts Hall, Saxmundham Conservation Area and views to the Church of St John; and
- Enhancement of the eastern parcel through the implementation of a parkland planting strategy and management regime to enhance the contribution that the site makes to the significance of Hurts Hall and parkland character of the setting to the Saxmundham Conservation Area

2.15 These mitigation measures have been identified indicatively on the Landscape Strategy Plan prepared by IDP attached at Appendix 1.

2.16 The Heritage Note concludes that the allocation of part of the Hopkins Homes land to the west of South Entrance has potential to deliver a significant benefit to the significance of Hurts Hall and the Saxmundham Conservation Area. This needs to be weighed against the impact of development on the northern portion of the western parcel which is likely to have some adverse impact on the significance of the same heritage assets. However, the context of Paragraph 196 of the NPPF, with embedded mitigation, the scale of harm is considered capable of being demonstrably outweighed in the planning balance by the substantial public benefits arising from the scheme. Notably these comprise the early delivery of land to provide essential new local infrastructure for a new primary school which will mitigate the impacts of future growth on existing education provision in the town and the heritage benefits to the provision of a significant area of restored parkland.

2.17 Hopkins Homes are committed to undertaking further consultation with Heritage England and liaise closely with stakeholders to develop proposals that minimise the impact on the significance of nearby heritage assets whilst maximising the delivery of public benefits for Saxmundham.
2.18 The work undertaken above clearly demonstrates that it is premature to remove the Hopkins Homes land from being shown indicatively as suitable for mixed use development and that matters would be most appropriately considered through a development brief for the whole site.

**Connectivity (Vehicular)**

2.19 As shown in the First Draft Local Plan, vehicular accesses were shown off both the A12 and South Entrance. The Final Draft proposes a single access point into the allocation off the A12.

2.20 A Transport Technical Note has been prepared by WYG in support of these representations to assess the implications of this (Appendix 3). In summary, the Note raises significant concerns that as drafted, the policy would result in an isolated scheme for 800 dwellings accessed off the A12 with no appropriate sustainable connectivity into the centre of Saxmundham. A single point of access from the A12 is considered wholly inappropriate due to the isolation from the town, the significant impact on other access points in to the town and the future impact of Sizewell D. There is no evidence that Suffolk County Council Highways consider that this is an appropriate solution.

2.21 It is considered that a separate vehicular access point onto the B1121 South Entrance, in addition to the access onto the A12, would offer a favourable solution which would only be deliverable by the development of the Hopkins Homes land. A review of the sustainable accessibility of the site demonstrates that the best opportunities for sustainable links between the site and Saxmundham are via South Entrance and that utilising the Hopkins Homes land is the only way to deliver this. A review of highway safety in the area also illustrates that South Entrance has a better safety record than the A12 and providing a second access to the site off South Entrance would reduce the risk of an adverse impact on highway safety. It is noted that in their representations Pigeon Capital Management has suggested a new bus service to link the allocation with the town centre in order to enhance connectivity, however, there is no evidence of how this would be delivered or that such provision would be viable.

2.22 Finally, pre-application discussions with Suffolk County Council in 2017 confirmed that the Hopkins Homes land would be best placed to deliver land for a primary school. There was a preference to seek to deliver this early on in the Plan period with direct linkages to South Entrance which would not be possible with the allocation as drafted. The County Council has not identified any other locations that they consider suitable to be able to meet this need. The Hopkins Homes land is the preferred location for the school and therefore the Hopkins Homes land is essential to deliver the preferred location for the primary school as well as a sustainable transport links into to Saxmundham.

2.23 In summary, the Transport Technical Note concludes that 'The draft allocation access arrangements are...
considered unsound in terms of connecting to Saxmundham, highway capacity, road safety, accessibility and sustainability and a link to the Hopkins Homes site is essential to resolve all of these.’

2.24 Whilst the objections in this regard from local residents and bodies are acknowledged, the Hopkins Homes land has not been subject to any assessment by the Council or other party which confirm that there would be an adverse impact on landscape as a result of development on the site.

2.25 Hopkins Homes has commissioned their own Landscape Appraisal Briefing Note prepared by IDP (Appendix 4) which provides a review of the relevant evidence base documents, supporting evidence by the landowners of the remaining land parcels within the draft allocation and provides an appraisal of the land within Hopkins Homes’ control for its suitability in terms the landscape and visual environment for its inclusion as part of allocation.

2.26 The Note identifies that there would be landscape impacts from the newly proposed breach of the A12 through the provision of employment land given that the settlement of Saxmundham is currently well contained to the east of the A12 with the road providing a sense of separation to the large area of open parkland to the west. The inclusion of land to the west of the A12 has resulted from the omission of the Hopkins Homes land. Clearly our view that this land is appropriate for development as set out throughout these representations, the breach of the A12 as drafted in entirely unnecessary.

2.27 Conversely, the Landscape Appraisal Briefing Note identifies that as confirmed in the Council’s own assessments, the Hopkins Homes land to the west of South Entrance is not considered to be of high sensitivity given the few value indicators and the low condition of the landscape.

2.28 It is considered that some level of development can therefore be achieved on this land by setting the northern and eastern boundary behind a landscape buffer with new native tree and woodland planting on the western side of the B1121. Views towards these features from the B1121 can be retained through sensitively placed woodland blocks and new hedgerows on the eastern side of the B1121. This planting as it matures will supplement the existing wooded boundaries that enclose the existing landscape. Development can also be arranged to maintain a meaningful gap between the new settlement edge and the village of Benhall. The land to the east of South Entrance is more sensitive and, in line with the above, would be conducive to open space as part of a comprehensive masterplan.

The Landscape Strategy Plan prepared by IDP would retain development to the east of the A12 in keeping with the existing pattern of settlement at Saxmundham, maintaining the undeveloped, open and rural character of the landscape to the west.

2.29 The Landscape Appraisal Briefing Note concludes that the Hopkins Homes land can provide a
sustainable, logical extension to the south of Saxmundham, providing substantial SANG that will be accessible to the existing town and new residents resulting in significant landscape benefits. It is concluded that the proposed allocation site and receiving environment have the ability to accommodate some level of development without resulting in undue effects, preserving the setting of key heritage features and delivering objectives for the landscape to the south of Saxmundham while conforming to adopted and emerging development polices and guidance.

2.30 The above is demonstrated on the Landscape Strategy Plan attached at Appendix 1.

Summary and Conclusion

2.31 The above has clearly demonstrated that the Council is unjustified and has acted prematurely in restricting land under Hopkins Homes’ control within the proposed allocation for use as formal/informal open space (Suitable Alternative Natural Greenspace) as opposed to mixed use development as shown indicatively in the First Draft of the Plan. This decision seriously jeopardises the deliverability of the allocation.

2.32 The decision arose purely as a result of a standalone Heritage Impact Assessment prepared retrospectively for the Council, which is at odds with the findings of a report prepared by Hopkins Homes, and indeed with the exception of this matter, there is no evidence supporting the Local Plan which identifies that development on the Hopkins Homes land would be harmful. The initial work undertaken by Hopkins Homes has confirmed that their land can form an integral part of the allocation, that there are no constraints to development on the site and that any impacts can be appropriately mitigated.

2.33 The inclusion of the Hopkins Homes land provides an important opportunity to improve the allocation by delivering broader benefits to the larger allocation and would provide greater flexibility and certainty. A significant area of land to the east of South Entrance under Hopkins Homes’ control can also be included in the allocation to provide the required SANG land up front for the allocation and assist in delivering future growth in the area and will also provide significant heritage benefits through the provision of an area of restored historic parkland.

2.34 The site can deliver new market and affordable homes to meet emerging housing needs and the early delivery of the primary school in the preferred location to the significant benefit of the town, enabling Saxmundham to fulfil its role as a key part of the A12 growth corridor. Finally, the Hopkins Homes land is considered essential for the provision of an accessible, sustainable connection into Saxmundham and would result in improvements to highway capacity and road safety.
2.35 Through these representations, significant concerns have been raised in respect of deliverability, prematurity and technical matters relating to the proposed Policy SCLP12.29 South of Saxmundham Garden Neighbourhood. The concerns raised are fundamental to the strategy underpinning the Local Plan and it is considered that as drafted the policy is not considered to be ‘positively prepared’ on the basis that it would be unable to contribute towards meeting the area’s objectively assessed needs, ‘justified’ as it does not represent the most appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence, ‘effective’ as it would not be deliverable over the plan period or finally ‘consistent with national policy’ as it would fail to enable the delivery of sustainable development in accordance with the policies in the NPPF. On this basis the policy is considered to render the Plan unsound in the context of paragraph 35 of the NPPF. The changes sought to the policy to enable it to be considered sound are set out within the representations.

2.36 On the above basis, it is considered the most appropriate strategy is to revert to the policy as proposed in the First Draft Local Plan. The following section sets out the changes sought to enable the Plan to be considered sound.
3.0 PROPOSED POLICY CHANGES

3.1 In light of the comments made throughout the representations, the following changes are requested to be made to the policy.

3.2 The boundary of the allocation should be extended to include the land to the east of South Entrance to be proposed as SANG (shown green) with the removal of the employment land to the west of the A12:

Figure 4. Suggested change to allocation boundary

3.3 Whilst it is considered premature in the Plan to a draft masterplan in the Local Plan until further work has been undertaken to identify and secure the optimum form of development within the site as a whole, should the Inspector consider this is necessary, it is considered that the indicative masterplan should be included as contained in the First Draft Local Plan, showing land to the east of South Entrance can be provided as SANG (green) and that some level of development on Hopkins Homes land to the west of South Entrance should as being acceptable as below:
Figure 5. Suggested change to indicative masterplan showing SANG land to the east of South Entrance

3.4 The policy should also be amended to acknowledge the multiple landownerships within the allocation and therefore confirm that the land to the west of South Entrance under the control of Hopkins Homes can come forward independently as a first phase in the delivery of the allocation to provide land for a primary school and housing to boost the supply in the earlier part of the Plan period.

3.5 In addition, with regard to criteria (b) for land to be reserved for an early years setting on the site, the Plan is not supported by any evidence to demonstrate that there is a current deficit in pre-school places in Saxmundham. There is furthermore no evidence to justify how the allocation would generate sufficient demand to require the specific provision of 0.13ha or that other alternative options have been investigated either through physical expansion or longer opening hours of existing provisions or the likelihood that new private sector nurseries would open to meet any increased demand. The criteria is considered unjustified and should therefore be deleted.
Policy SCLP12.29: South Saxmundham Garden Neighbourhood

Approximately 66.6ha 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 master plan approach brought forward through landowner collaboration and community engagement.

Critical to the success of this master plan 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 master plan 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 **as Phase 1**;

b) **0.13ha of land for a further early years setting**;

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 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, as informed by a heritage impact assessment;

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 **which can come forward in a series of phases**;
t) Provision of appropriate police, community safety and cohesion facilities.

The necessary off-site infrastructure requirements, including health provision and police facilities will be required through developer contributions and water recycling upgrades undertaken by Anglian Water through the Asset Management Plan. Any necessary off-site transport improvements will need to be provided to the satisfaction of Suffolk County Council.
APPENDIX 1 – Landscape Strategy Plan prepared by IDP
APPENDIX 2 – Heritage Briefing Note prepared by Barton
Willmore Planning LLP
Land off South Entrance, Saxmundham

Heritage Review

February 2019
Land off South Entrance, Saxmundham

Heritage Review

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## CONTENTS

1.0 Introduction
2.0 Identified Heritage Constraints
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1.0 INTRODUCTION

1.1 This review has been prepared by Joanna Burton IHBC, Heritage Associate, on behalf of Hopkins Homes to consider the likely heritage impacts that could result should the proposed allocation identified on Fig. 1 come forward for development. This land is being promoted through the current local plan process as Site SCLP12.29 South Saxmundham Garden Neighbourhood for mixed use (Fig. 1). The draft policy text makes provision for an education led garden neighbourhood development, comprising primary school provision, community facilities, employment land and open space alongside residential development of approximately 800 units.

1.2 The eastern parcels of the proposed allocation shown on Fig. 2 are being promoted by Hopkins Homes on behalf of the landowner and form the focus of this review.

1.3 The indicative masterplan for Site SCLP12.29 as proposed in the Local Plan Final Draft (January 2019) shows the Hopkins Homes land parcels retained as ‘Informal/formal open space’ (Fig. 3).
Fig. 2. Hopkins Homes land parcels
Fig. 3. South Saxmundham Garden Neighbourhood – Indicative draft masterplan, Suffolk Coastal Local Plan Final Draft (January 2019), p. 227.

Fig. 4. Landscape Strategy
1.4 Hopkins Homes have prepared an alternative as shown on the indicative Landscape Strategy (Fig. 4). This shows how residential development and a school site can be provided on the northern portion of the western land parcel, with the eastern parcel retained as open space enhanced with parkland planting.

1.5 Saxmundham is a historic Suffolk market town, the architectural and historic interest of which is recognised through several heritage designations including the designation of the historic core as a Conservation Area. The potential heritage constraints have been the subject of two studies to date:


1.6 The report by Atkins was prepared in September 2018 on behalf of Roger Skinner. The report confirms that Mr Skinner is objecting to the housing and associated development allocation to the south of Saxmundham.

1.7 The report on behalf of SCDC was prepared in November 2018 to inform the local plan process. The ensuing report has not been the subject of any public consultation.

1.8 In addition to the above, Historic England, Saxmundham Town Council and other stakeholders have submitted representations as part of the local plan process.

1.9 The July 2018 Suffolk Coastal Local Plan First Draft included the site as SCLP12.26 with an indicative masterplan which showed development on the land to the west of the B1121. The analysis in the Interim Sustainability Appraisal (July 2018) concluded that this site could be delivered with ‘no effect’ on heritage assets. Following this analysis however, the indicative masterplan has been revised to remove the western parcel from the developed area as shown in Fig. 3.

1.10 This briefing note seeks to draw together the conclusions of the reports and representations that have been prepared on this site to date and to consider the potential of the identified land parcels to accommodate development in principle as shown on the indicative masterplan (Fig. 4). To ensure a full and objective understanding of the nature of the heritage assets and their settings, this note has been informed by a site visit on 13 February 2019 and further desk-top research.
Fig. 5. South Saxmundham Garden Neighbourhood, Suffolk Coastal Local Plan First Draft, July 2018
2.0 IDENTIFIED HERITAGE CONSTRAINTS

2.1 A summary of the main likely impacts identified in the reports is set out below.

Heritage Specialist Response to SCDC’s Draft Local Plan by Atkins on behalf of Mr Roger Skinner (September 2018)

2.2 The September 2018 report by Atkins identified the following heritage assets with potential to be affected:

- Grade II listed Hurts Hall;
- Saxmundham Conservation Area;
- Grade II* listed Church of St John the Baptist;
- Grade II* listed Church of St Mary (Benhall);
- Grade II listed Home Farmhouse, Old Vicarage, The Old House, The Limes and Garden Cottage, Benhall;
- Grade II listed Benhall Stores; and
- The Layers (not designated).

2.3 The conclusions regarding significance and potential heritage impact can be summarised as follows:

- Hurts Hall: The setting of the house encompasses the surviving elements of historic views of and from the western part of the house, including views to and from the site. The views of and from the western part of the house make a strong contribution to the significance of the house and form the majority of its visual setting. Other important elements of the house’s setting include its visual and historic relationship with the church, with the best views of the house that include the church seen from The Layers.

  Development on the site would alter a large proportion of the former parkland to Hurts Hall, including much of its higher ground. Views outwards from the principal rooms would be substantially altered, with the former open parkland substantially truncated. The historic extent of the parkland would lose legibility. The link road over the railway bridge and the removal of historic hedges at the road’s junction with the B1121 would create a linear viewing channel at variance with the grain of the parkland. There would be a major adverse impact to the setting of Hurts Hall, causing significant harm.
- Saxmundham Conservation Area: The southern boundary is the only boundary where the C19 town boundary and its relationship with the countryside beyond remains intact. This is enhanced by the very high proportion of buildings that are either listed or identified as making a positive contribution. The abrupt unchanged southern boundary and the unchanged pattern of fields and tree plantations contributes strongly to the conservation area’s historic character and appearance and thus its setting. It notes that the views outwards towards Hurts Hall and The Layers are identified as significant.

Development against the southern boundary would radically impact an important aspect of the setting comprising the abrupt change in character. Identified important views would be adversely impacted and the view southwest out of the conservation area would be substantially degraded. The view southeast over the proposed parkland towards Hurts Hall would be adversely affected by the proposed additional tree planting. The cluster of listed buildings and the southern edge of the conservation area would be impacted as a result of the proposed development diminishing channelled linear views.

- Church of St John the Baptist: Longer views of the church reflect its role in the wider community and architecture and contribute strongly to its significance. Surviving long views are limited, however the best long views are from the former parkland on Hurts Hall and The Layers. From here, the relationship between the church and Hurts Hall is legible.

The development would significantly harm longer views of the church from The Layers giving rise to at least a moderate adverse impact on its setting.

- Church of St Mary, Benhall: The topography and vegetation screening means that the church is largely screened from the site. Development on the site is unlikely to cause significance harm to this heritage asset, although there is a possibility that some of the north westernmost development may have intervisibility with the top of the church tower. In this scenario, harm is unlikely to be significant.

- Home Farmhouse, Old Vicarage, The Old House, The Limes and Garden Cottage, Benhall: These buildings are largely screened from the site.

Development is unlikely to cause significant harm to these heritage assets.
• Benhall Stores: Views downhill from Kiln Lane of the east of the railway and within the southern edge of the site from an important part of the setting.

Development on the southern boundary of the site as well as the introduction of buildings on top of the hill has the potential to harm the setting of Benhall Stores and the cluster of listed buildings in Benhall Green.

• The Layers: The report contains no assessment of the significance of The Layers. It concludes that the open space of The Layers would be removed, thereby removing an important aspect of its legibility with regards to its association with the planning of the Normandy WWII landings.

2.4 It summarises that the development would cause ‘significant harm’ to the conservation area, Hurts Hall and St John’s Church, as well as potential harm to the setting of Benhall Stores and cluster of buildings at Benhall Green.

**Heritage Impact Assessment by David Edleston Report (Conservation Architect and Historic Built Environment Consultant) on behalf of SCDC**

2.5 The November 2018 report commissioned by SCDC identifies the following heritage assets with potential to be affected:

• Church of St John;
• Hurts Hall;
• Saxmundham Conservation Area;
• Grade II listed buildings at South Entrance, Saxmundham;
• Unlisted buildings at South Entrance, Saxmundham;
• Grade II listed The Limes & Garden Cottage, Benhall; and
• Grade II listed Benhall Cottage, Benhall Stores, 5 &6 Benhall Green, Bay Tree Cottage, 7 & 8 Benhall Green, Lime Tree House, Benhall.

2.6 The conclusions regarding significance and potential heritage impact can be summarised as follows:

• Church of St John: Its significance is derived from its considerable architectural, historic, archaeological and artistic interest. It stands in an elevated position with open land to the south enabling it to be seen in wider views. This open landscape includes the remnants of Hurtshall Park and agricultural land which forms the setting of the church to the south and south west including the B1121 and The
Layers in the eastern part of the site. The ability to appreciate the church in this open, rural setting makes an important contribution to its significance.

Development will affect important views to and from the church resulting in a harmful adverse impact.

- **Hurts Hall**: Built for the Long family and set in extensive parkland, Hurts Hall is of considerable architectural and historic interest. In 1840, the original Hurts Hall was described as *'a large white brick mansion lying in a well wooded park of around 200 acres'*. This is reflected in the 1840 map which shows it having a private outlook\(^1\). Hurtshall Park was quite extensive, extending to the River Fromus with open land beyond forming part of the extended setting, including The Layers. The open and rural character of the surrounding parkland and agricultural land forms its extended setting and makes an important contribution to its significance.

  Development will affect important views to and from Hurts Hall resulting in a harmful adverse impact.

- **Saxmundham Conservation Area**: The Conservation Area includes the historic core of the town with a wealth of listed and other historic buildings. It notes that the conservation area appraisal highlights that Hurts Hall provides an expansive, attractive rural character before entering the density of the town. It concludes that the remaining rural setting and relationship with the surrounding landscape to the south is all the more important following later development against other parts of the conservation area boundary. The abrupt change from rural to urban creates an important gateway and sense of arrival.

  As the only undeveloped area of land adjoining the conservation area, the site has an important role in retaining the historic relationship with the rural setting and urban character of the town. Development will therefore have a harmful impact on its significance.

- **Listed and unlisted buildings to South Entrance**: The setting of the listed buildings and non-designated heritage asset on both sides of South Entrance is urban in character and is formed by their relationship with the street and with one another as a group. Those at the southern end however, Grade II listed Crown House, The White House and Monks Cottages is defined by the open rural area.

\(^1\) Note this was the original Hurts Hall which has since replaced.
The relationship between the more urban built form of the town and the open, rural character of land to the south creates a strong sense of arrival. Any future enhancement of this area as described in the Draft Local Plan has potential to cause harm to this relationship and the setting of buildings on South Entrance.

- Benhall Stores: Formerly a public house, Benhall Stores is now a dwelling occupying a prominent position on Main Road. The open character of the landscape surrounding Benhall Stores makes a key contribution to the way in which the building is experienced. Any development which extends as far south as Grays Lane and includes areas of open agricultural and to the north west has potential to cause some degree of harm.

**Historic England Suffolk Coastal First Draft Local Plan 12 September 2018**

2.7 Historic England responded to the First Draft Local Plan on 12 September 2018. This raised concerns regarding the potential impact of development on the Church of St John the Baptist, Hurts Hall and the Saxmundham Conservation Area. It recommended that SCDC undertakes a heritage assessment to understand whether development could be brought forward and, if so, where harm could be avoided or mitigated through design.

**Saxmundham Town Council First Draft Local Plan 10 September 2018**

2.8 Saxmundham Town Council made representations to the First Draft Local Plan, raising the role of The Layers in protecting the historic entrance to Saxmundham and avoiding the coalescence of Saxmundham and Benhall.

**Saxmundham and District History Society**

2.9 Representations made by the Saxmundham and District History Society highlight the use of The Layers as the site of the Suffolk Show on 14 occasions between 1831 to 1939 and later by the army which used The Layers to trial tanks used for the D-Day Landings, being based at Hurts Hall which had been requisitioned.
3.0 ANALYSIS: PRINCIPLE OF DEVELOPMENT

3.1 A review of the potential heritage impacts that may result from the development as proposed in Fig. 4 is considered below. This is informed by the primary and secondary research and conclusions set out in the heritage appraisals referenced above together with a site visit undertaken on 13 February 2019. It takes into account the following embedded mitigation measures that could be given policy protection in the final policy text/masterplan and are shown in Fig. 4:

- Retention of the entire area of the eastern parcel as open space to: maintain the open setting to Hurts Hall, Saxmundham Conservation Area and views to the Church of St John;
- Enhancement of the eastern parcel through the implementation of a parkland planting strategy and management regime to: enhance the contribution that the site makes to the significance of Hurts Hall and parkland character of the setting to the Saxmundham Conservation Area;
- Retention of the hedgerow along the western boundary of the western parcel to: retain the historic landscape feature;
- Retention of the southern portion of the western parcel as green open space to: maintain the open character to the setting of Saxmundham Conservation Area, avoid coalescence with Benhall and protect the setting of listed buildings within Benhall;
- Reinstate the historic field boundary as the southern extent of development in the western parcel to: embed historic landscape features within the new development;
- Retention of the hedgerows along the B1121 to: maintain the green character of the approach to Saxmundham Conservation Area and setting of Hurts Hall;
- Set back development a minimum of 20m from the road to: maintain the green character of the approach to Saxmundham Conservation Area;
- Planting trees along the B1121 to: filter views outwards from Hurts Hall; green the site; reinforce the parkland character to the setting of the conservation area; create a sense of arrival into Saxmundham appropriate within the setting of Hurts Hall;
- Planting trees on the northern boundary of the eastern portion to: reinstate the screening effect of the historic Lodge Plantation;
- Retention of the green landscaping buffer in the north-eastern corner of the western parcel to: mitigate the impact of built form in views outwards from South Entrance; and
• Retention of a landscaping buffer along the eastern boundary of the western parcel to: mitigate the impact of built form on the character of the approach to Saxmundham Conservation Area.

**Scope of Potential Heritage Impact**

**Church of St John**

3.2 The primary heritage interest of the Church of St John is derived first and foremost from its fabric and built form, dating from the C14 with later rebuilding/restoration campaigns in the mid-C19, late C19, early C20 and post-WWII. As a parish church, it shares a close historic, functional and communal relationship with the built form of Saxmundham.

3.3 Its elevated position also allows long views across the landscape and reinforces the church’s historic and visual relationship with the Hurts Hall Estate. Whilst these views allow an appreciation of its significance, they do not make an integral contribution to its special interest.

3.4 Notwithstanding the above, restricting development to the western portion will enable the church to continue to be appreciated in a landscape setting in close visual and historic association with the parkland at Hurts Hall. Views northeast from the B1121 will remain open and will be enhanced by the proposed parkland restoration. The retention (and enhancement) of these views are sufficient to preserve the contribution that the setting makes to the significance of the church.

3.5 Development can be accommodated on the western parcel with no material impact on the contribution that the setting makes to the significance of this listed building.

**Hurts Hall**

3.6 Hurts Hall is of special architectural and historic interest as a Victorian country seat and therefore its surrounding estate makes an important contribution to an appreciation of its significance. The surrounding land does not however make an equal contribution to that significance.

3.7 The land to the east of the River Fromus remains within the estate ownership and has retained some sense of its former parkland character, albeit much denuded. The land to the west of the River Fromus (the site), has been in different ownership since 1973 when
the Hall was sold away from the farmland and is therefore already fragmented from the historic estate. This is reflected in its current character as agricultural fields.

3.8 As recorded in the 1840 Tithe Apportionment, the eastern parcel was in arable use consistent with forming part of the designed parkland. It is now agricultural in character having lost its parkland appearance. The land to the west of the B1121 was in arable use at this time and remains in agricultural use today.

3.9 This is evidence that the B1121 has historically defined the edge of the parkland landscape intended to make an important aesthetic contribution to Hurts Hall. The land to the west of the B1121 has historically been separate, forming part of the working agricultural land of the former estate. Whilst therefore it shares a historic association with Hurts Hall (now lost through the change in ownership), it was not intended to perform an aesthetic role to the same degree as the eastern parcel. This is reflective of the divisive effect that the B1121 has on the landscape which is even more the case today given how busy the road is with traffic.

3.10 On this basis, the retention and enhancement of the eastern parcel from its current agricultural use to parkland character would significantly enhance an ability to appreciate and understand the aesthetic value of Hurts Hall, its status and how it was situated within a designed landscape. This would reveal lost significance, thereby delivering a substantial direct heritage benefit.

3.11 The western portion is not of the same sensitivity, notwithstanding that a significant proportion of it (roughly half) would remain open. Through careful treatment of the frontage to the B1121, control of scale, massing and design with a high-quality landscaping plan, it is considered that development could be delivered on the northern half whilst retaining the principle positive elements of the setting that contribute to the significance of the asset. Such measures could include restricting the height of built form across the development, parkland tree planting in the eastern parcel and further tree planting along the B1121 to reduce the visibility of development in views outwards from the parkland and house.

3.12 It has been asserted by the report prepared by Atkins that the proposals would alter a large proportion of the former parkland to Hurts Hall. As made clear in the 1840 map provided as figures 16 and 17 of David Edleston’s report and the Tithe Apportionment, the land proposed for development is only a very modest proportion of the historic landholding. Furthermore, the land proposed for development is agricultural in character. The impact therefore identified by Atkins is considered to be overstated.
**Saxmundham Conservation Area**

3.13 The rural character of the setting of Saxmundham to the south is characteristic of the market town and reflective of the historically open, rural setting that the town has enjoyed to the south.

3.14 The proposed reinstatement of the parkland setting to the eastern parcel would enhance the experience of entering and leaving Saxmundham and the parkland character that is a feature of its setting. There is also potential to enhance the buffer planting around the southern edge of the town known as Lodge Plantation that has been eroded, particularly with the recent insertion of a new driveway to Hurts Hall. The reinstated parkland will retain and enhance the key relationships between Hurts Hall, the Church of St John and the historic core of Saxmundham that can be appreciated from the B1121.

3.15 Development on the northern half of the western portion would affect a change to the setting of the historic core of the village which extends to the boundary at this point. The wider rural setting of the conservation area would be retained albeit pushed southwards to the west of the B1121. This would change the current experience of the conservation area from the southern entrance. Nevertheless, the rural character would not be lost entirely given the retention of the eastern parcel and the southern half of the western parcel as open space.

3.16 The impact of the introduction of built form can be mitigated through detailed design measures that can be given policy protection in the site-specific wording. These measures can include the proposed landscaping strategy that will maintain the green character to the B1121 and the set back of development from the northern boundary and B1121 to maintain the green character in views southwest from South Entrance. South-easterly views from the Saxmundham Conservation Area would be enhanced through the proposed landscape restoration.

3.17 The impact of the development needs to be considered in the context of the Saxmundham Conservation Area as a whole. To consider this a significant change to the character and appearance of the conservation area is to overstate the impact. From most parts within the conservation area boundary, one would have no perception of the development proposed on the western parcel of the site. It cannot, therefore, on this basis be considered to fundamentally change its character. This is one approach into the conservation area, with others available from the north, east and west. Furthermore, the prevailing character of the setting of the conservation area is characterised by C20
development. It would not therefore be a fundamental change or even one that would have a significant impact.

3.18 The application of a principle whereby development cannot be justified in the setting of conservation areas where it makes a positive contribution would, in many instances, prevent the growth of urban and rural conservation areas alike. This is not the purpose of heritage designation, local or national heritage planning policy. Any impact would however require clear and convincing justification and need to be outweighed by the public benefits in the planning balance should applications come forward for development. The site is not considered to be so sensitive at this stage that such harm could not, in principle, be outweighed by the wider public benefits. Furthermore, it should be acknowledged that the restoration of the parkland character would deliver a tangible heritage benefit that needs to be weighed in the balance. The presence of the conservation area boundary should not, therefore, preclude the allocation of this land at this stage.

**Listed and Unlisted Buildings, South Entrance Saxmundham**

3.19 None of the listed buildings open directly onto the proposed site allocation; rather they are located north of the southern limit of South Entrance and form part of the streetscape. The analysis above identifies the abrupt change between open countryside and urban townscape as one of the characteristics of the conservation area. Situated within the town, their setting is therefore characterised by built form and not the open land of the site. It is considered here that, with careful consideration of detailed design matters at the application stage, development can be accommodated on the site without harm to the significance of these assets.

3.20 This same principle applies to the positive unlisted buildings along South Entrance.

3.21 The exceptions to this are the southernmost buildings: No. 32 and No. 51 South Entrance. In the first instance, their identification as buildings that make a positive contribution to the conservation area does not by default make them non-designated heritage assets.

3.22 Notwithstanding the above, should they be considered as non-designated heritage assets, they would not be statutorily protected and would not on this basis present a strong reason to restrict development in principle within the site allocation.

3.23 On this basis, the constraints identified by David Edleston on behalf of SCDC at South Entrance do not present a constraint to the allocation of this site. This is consistent with
the assessment by Atkins which did not identify the impact on these buildings to be a concern.

**Benhall Heritage Assets**

3.24 The potential impact flagged in the report by Atkins and for SCDC on these assets is acknowledged given that the boundary of the allocation extends as far south as the northern extent of Benhall.

3.25 This risk has been managed through the Landscape Strategy which shows the southern half of the western portion of the site retained as open land; the eastern portion is retained entirely as (enhanced) open landscape. This provides a significant landscape buffer that would be more than adequate to protect the open character of the land surrounding Benhall, the assets within (including Benhall Stores and the Church of St Mary) and to avoid any sense of coalescence between the hamlet of Benhall and Saxmundham.

3.26 The listed buildings in Benhall are located at some distance from the southern boundary of the site allocation with intervening development including the hamlet in which they are situated. It is considered extremely unlikely that development on the northern portion of the western parcel would have any impact on their significance or how they are experienced.

3.27 The Landscape Strategy shows how development of the scale proposed could be accommodated without any adverse impact on the significance of assets at Benhall. The retention of the southern portion of the western parcel could be included within the masterplan strategy and policy wording of the site-specific policy to secure this. On this basis, the potential impacts identified by Atkins and David Edleston on behalf of SCDC can be entirely dealt with without any harm to these assets.

**The Layers**

3.28 The Atkins report gives importance to The Layers as does representations made by the Saxmundham and District History Society and Saxmundham Town Council. There is no entry on the online Suffolk Historic Environment Record that formally identifies the use of this land for either the holding of livestock or the conception of the Normandy landings. It does not appear to have been formally identified as a non-designated heritage asset and on this basis alone should not be considered to be a material consideration in the local plan or decision-making process.
3.29 The Layers abuts the boundary to the Conservation Area. Whilst conservation area designation best practice generally advises against including large areas of land on setting grounds, where this land is of sufficient interest in its own right, this can be brought within the boundary. In this instance, the boundary has not been extended to include The Layers despite opportunities to do so at the point of designation in 1970, extension in 1980, re-designation in 1991 and audit in 2016.

3.30 There is nothing present on the ground that would permit an understanding of either its use as part of the Suffolk Show or its role in the planning of the Normandy landings. In summary, this association is not considered to preclude development on the site.
4.0 CONCLUSIONS

4.1 Paragraph 11 of the National Planning Policy Framework (NPPF) (2019) sets out a presumption in favour of sustainable development for plan-making and decision-taking. For plan-making, this means that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. Strategic policies should provide for objectively assessed needs for housing and other uses, unless the application of policies in the NPPF that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area. Such areas or assets of importance include designated heritage assets. Or, 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.

4.2 Paragraph 185 of the NPPF states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

c) the desirability of new development making a positive contribution to local character and distinctiveness; and

d) opportunities to draw on the contribution made by the historic environment to the character of a place.

4.3 With regards to the Church of St John, the allocation of the land for development with the embedded mitigation proposed would set out a positive strategy for the conservation and enjoyment of this highly graded heritage asset as encouraged by paragraph 185 of the NPPF. It should not present a constraint to the allocation of this site.

4.4 The proposed Landscape Strategy would result in both beneficial and adverse impacts to the significance of Hurts Hall. The eastern parcel is more sensitive than the western parcel. The proposed landscape restoration is considered to deliver significant enhancement to an appreciation of the aesthetic value of the listed building in a designed landscape setting. This would offset the impact resulting from the development of agricultural land to the west that has always been separate from the estate parkland and
is now in separate ownership. On this basis, the proposals are considered to satisfy the general thrust of paragraph 185 which encourages the preservation and enhancement of heritage assets.

4.5 The experience of the Saxmundham Conservation Area would be changed by the proposed development. The scale of impact has been reduced by restricting development to the western side of the B1121 at the northern end and through careful landscaping. Any impacts can be further reduced at the detailed design stage to ensure that the character of the built form and landscape reinforces local character and distinctiveness. For these reasons, the potential scale of harm is not considered to be such that it would present a strong reason for restricting development in this location or is not capable of being outweighed in principle by the resulting public benefits.

4.6 This review has shown that development of the scale proposed can be delivered with no adverse impact on the significance of individual designated heritage assets at Benhall or South Entrance, Saxmundham. Any potential impact on non-designated heritage assets at the southern end of South Entrance (should they be identified as such) does not present a constraint to the proposed allocation of this site, with a balanced judgement being required having regard to the scale of any harm or loss and the significance of the assets in decision-taking.

4.7 The Layers is not subject to any heritage designation. On this basis, its reported historic associations with the Suffolk Show and Hurts Hall should not preclude its development in principle.

4.8 In summary, the allocation of this land and delivery of development in line with the proposed Landscape Strategy has potential to deliver a significant benefit to the significance of Hurts Hall and the Saxmundham Conservation Area. This needs to be weighed against the impact of development on the northern portion of the western parcel which is likely to have some adverse impact on the significance of the same heritage assets. With embedded mitigation secured through policy wording, the scale of harm is considered in principle to be capable of being demonstrably outweighed by public benefits arising from the scheme and does not present a strong reason to restrict development in this location at this stage.
Saxmundham Garden Neighbourhood,
Transport Technical Note
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1.0 Introduction

1.1 Background

1.1.1 This Transport Technical Note provides comments on behalf of Hopkins Homes and the landowner in respect of the draft Saxmundham Garden Neighbourhood allocation (Policy SCLP12.29) contained in the emerging Suffolk Coastal Local Plan. This shows part of the land under Hopkins Homes’ control (Land at South Entrance) as Suitable Alternative Natural Greenspace (SANG) rather than for mixed use development as previously proposed in the First Draft version of the Plan consulted on between July and September 2018.

1.1.2 The Hopkins Homes land, along with the land to the west is considered an essential delivery mechanism in delivering the growth required for Saxmundham through the provision of land for a new Primary School early in the Plan period.

1.1.3 Pre-application discussions undertaken with Suffolk County Council in 2017 confirmed that the Hopkins Homes land would be best placed to deliver the Primary School, the area indicated meeting all of the County’s requirements in terms of size shape and accessibility.

1.1.4 There was a preference to seek to deliver this early in the Plan period with direct linkages to South Entrance which would not be possible on the remaining land within allocation. Suffolk County Council has not identified any other locations that they consider suitable to be able to meet this need. The Hopkins Homes land is the preferred location for the school.

1.1.5 As drafted, the amended allocation would result now in an isolated scheme for 800 dwellings accessed off the A12 with no appropriate sustainable connectivity into the centre of Saxmundham. 800 dwellings solely being served from a new access of the A12 is considered inappropriate due to the isolation from Saxmundham, the significant impact on other access points in to Saxmundham and the future impact on Sizewell D.

1.1.6 Development of the Hopkins Homes land in conjunction with the land to the west would enable improved vehicular, cycle and pedestrian linkages into Saxmundham.
2.0  Local Transportation Policy Review

2.1  Suffolk County Council Local Transport Plan 2011 – 2031

2.1.1  This document sets out Suffolk County Council’s long-term transport strategy for the next 20 years starting from 2011 which focuses in supporting Suffolk’s economy and the future sustainable economic growth by:

- "maintaining (and in the future improving) our transport networks,
- Tackling congestion,
- Improving access to jobs and markets, and
- Encouraging a shift to more sustainable travel patterns”.

2.1.2  One of the principal ways in which transport can contribute towards the reduction of carbon emissions is by encouraging the use of more sustainable forms of transport.

2.1.3  Utilising the Hopkins Homes land for development of the Garden Neighbourhood will help to encourage use of more sustainable forms of transport as the Hopkins Homes land is adjacent to South Entrance which provides continuous pedestrian connections into Saxmundham along with a bus service which provides a connection to the railway station and villages to the east and north of Saxmundham.

2.1.4  The development area as illustrated in the emerging Local Plan does not provide appropriate opportunities for sustainable links to and from Saxmundham.

2.1.5  The LTP identifies that for rural areas within Suffolk such as Saxmundham, the transport strategy will be based around five themes which are:

- "Better accessibility to employment, education and services,
- Encouraging planning policies to reduce the need to travel,
- Maintaining the transport network and improving its connectivity, resilience and reliability,
- Reducing the impact of transport on communities, and
- Support the county council’s ambition of improving broadband access throughout Suffolk.

Utilising the Hopkins Homes land will help to provide sustainable access and links to employment and services within Saxmundham, thereby reducing the need to travel. Promoting only an access onto the A12 would likely encourage travel to destinations other than Saxmundham.
2.2 Suffolk Coastal Local Plan

2.2.1 The adopted version of the Suffolk Coastal Local Plan (adopted in 2013) includes the Core Strategy and Development Policies and set out the vision for the district.

2.2.2 A number of objectives are contained in the Core Strategy including:

- **Objective 1: Sustainability** – to deliver sustainable communities through better integrated and sustainable patterns of land use, movement, activity and development.
  - It is considered that use of the Hopkins Homes land is essential to achieving this objective as this will enable links out onto South Entrance which provides the most direct and appropriate continuous link into Saxmundham. Whilst the development area illustrated in the emerging Local Plan does promote sustainable links, these appear more arduous and the most direct links rely on crossing over Hopkins Homes land onto South Entrance.

- **Objective 8: Transport** – to enhance the transport network across the district.
  - It is considered that use of the Hopkins Homes land is essential to achieving this objective as a direct link to the existing bus service which serves South Entrance can be made using Hopkins Homes land.

- **Objective 12: Design** – to deliver high quality developments based on the principles of good, sustainable and inclusive design.
  - It is considered that use of the Hopkins Homes land is essential to achieving this objective as this would enable an inclusive masterplan providing several access and linkage opportunities.

- **Objective 13: Accessibility** – to promote better access to, housing, employment, services and facilities for every member of the community.
  - It is considered that use of the Hopkins Homes land is essential to achieving this objective as this option enables direct links to South Entrance and into Saxmundham.

- **Objective 14: Green Infrastructure** – to encourage and enable the community to live and enjoy a healthy lifestyle; to promote urban cooling (e.g. shading from trees, canopies on buildings to cool down areas and buildings in urban settings) in major settlements as well as support biodiversity and geodiversity.
  - It is considered that use of the Hopkins Homes land is essential to achieving this objective as land to the east of South Entrance could be utilised as a SANG.
Saxmundham Garden Neighbourhood, Transport Technical Note

- **Objective 15: Physical and Community Infrastructure** – to ensure that, as a priority, adequate infrastructure such as transport, utilities or community facilities are provided at an appropriate time, in order to address current deficiencies and meet the needs of new development.
  - It is considered that use of the Hopkins Homes land is essential to achieving this objective.

2.2.3 Strategic Policy (SP) pertinent to the use of Hopkins Homes land in the development of the Garden Neighbourhood includes:

- **SP11: Accessibility** – In relation to public transport this will include improving both the quantity and quality of the service on offer. In relation to foot and cycle provision this will mean securing safe and easy access to local facilities where walking or cycling offers a realistic alternative for most people.

- **SP17: Green Space** – The Council will seek to ensure that communities have well-managed access to green space within settlements and in the countryside and coastal areas, in order to benefit health, community cohesion and greater understanding of the environment, without detriment to wildlife and landscape character.

2.2.4 The Hopkins Homes land can provide direct connection to the footways on South Entrance, which also connect to the closest bus stops to the site.

2.2.5 Development Management Policies (DM) pertinent to the use of Hopkins Homes land in the development of the Garden Neighbourhood includes:

- **DM22: Design Function** – Proposals should make provision for their functional requirements. The design and layout of the development provides:
  - safe and convenient access for people with disabilities,
  - adequate provision for public transport, cars, cycling, garages, parking areas, access ways, footways, etc in a manner whereby such provision does not dominate or prejudice the overall quality of design and appearance,
  - access, turning and manoeuvring for emergency vehicles and the collection of waste, and
  - proposals for development take into account the need for crime prevention.

2.3 **Suffolk Design Guide for Residential Areas**

2.3.1 The Suffolk Design Guide sets out an access road hierarchy and required characteristics for each type of road with advice on typical levels of development which each type of road should provide access to.
Saxmundham Garden Neighbourhood, Transport Technical Note

2.3.2 The highest-level access road is the Local Distributor Road which should be provided for access to developments with over 300 dwellings. The guidance suggests that Local Distributor Roads should be a through route, thereby providing two separate points of access.

2.3.3 A scheme which provides only a single point of access onto the A12 therefore is unable to satisfy the required design criteria of a Local Distributor Road which is the type of road which will be required to provide access to the Saxmundham Garden Neighbourhood.

2.3.4 It is considered that a separate vehicular access point onto South Entrance in addition to the access onto the A12 would offer a favourable solution over two access points onto the A12 and therefore land within Hopkins Homes gift is considered essential to the delivery of the allocation.
3.0 Highways Capacity

3.1 The Suffolk County Transport Model

3.1.1 The Suffolk County Transport Model (SCTM) is a SATURN model which has been calibrated and validated to a base year of 2016. Traffic forecasts have been generated from this base year model to reflect a forecast year of 2036.

3.1.2 The forecast modelling represents the cumulative impact of potential developments or potential growth areas coming forward up to 2036.

3.1.3 With respect to the Suffolk Coastal District area within the model, developments included in the forecasting can be attributed to specific allocated developments.

3.1.4 The model shows a growth in traffic by 2036. This growth in traffic is a result of changing patterns of travel behaviour and predicted future growth in housing and jobs across Suffolk. The results cannot be interpreted as simply as ‘Local Plan vs no Local Plan’, i.e. it could not reasonably be assumed that if there were no Local Plan traffic patterns would be the same in 2036 as they were in 2016.

3.1.5 The growth assumptions for the modelling consider population growth and specific development locations, as well as car ownership and relative vehicle operating costs. This information comes from the Local Plans and the use of the Department for Transport TEMPro software.

3.1.6 The analysis has shown that while many junctions may be close to or exceed capacity in 2036; there are also many parts of the network that will operate well within their theoretical capacity. For junctions shown to approach or exceed operational capacity, the individual development proposals assessed within the model would, as part of their planning applications, need to consider additional measures to help mitigate any impact.

3.1.7 The B1121 / B1119 / Chantry Road signals in Saxmundham is identified as one such location where the model forecasts congestion and as such the emerging proposals for the Saxmundham Garden Neighbourhood will be required to take this junction into consideration.

3.1.8 Willow Consulting’s Highways and Transportation Statement (September 2018) states, on the basis of a single vehicular access to the development off the A12 to the west that: "No traffic will be routed through the town centre and hence will not exacerbate current congestion issues at the Chantry Road signalled junction”.

3.1.9 WYG do not entirely agree with this assumption. Given the proximity to Saxmundham and the amenities on offer in the village centre, particularly along High Street immediately north
of the Chantry Road signals junction, it is inevitable that some traffic would travel to and from Saxmundham via the Chantry Road signals junction.

3.1.10 It is considered that a scheme which provides a choice of vehicular accesses into the development site (off A12 and off Southern Approach) would provide a preferable solution in terms of impacts and vehicle movements through the Chantry Road signals junction.

3.1.11 A scheme which provides an access onto the A12 only effectively makes any vehicular journey into Saxmundham or any of the villages to the east more arduous, effectively isolating the development from Saxmundham, rather than promoting accessibility as desired in Policy SCLP12.29 of the Draft Local Plan.

3.1.12 Whilst the model has not illustrated any severe congestion along the A12 corridor in the Saxmundham area, providing a single access to the site onto the A12 will inevitably have an impact on the operation of the A12 and junctions along it, more so than in vehicles had a choice of access points to use between the A12 and South Entrance.

3.2 Chantry Road Signals Junction

3.2.1 Manual Classified turning counts were undertaken at the Chantry Road signals junction on Wednesday 22nd February 2017 between 07:00 – 10:00 and 15:00 – 19:00.

3.2.2 An assessment has been undertaken at the junction to represent a scenario is 2022 where the 2017 base traffic is growthed using a locally adjusted TEMPro factor, and up to 350 residential dwellings are developed on the Hopkins Homes land all accessed via South Entrance.

3.2.3 This split of the total overall development for the Garden Neighbourhood using the South Entrance access point is considered robust.

3.2.4 The LinSig assessment at the junction illustrated that the junction would operate satisfactorily with spare capacity during both the weekday AM and PM peak periods and therefore this junction should not be considered a deterrent to providing an access to the Garden Neighbourhood off South Entrance.
4.0 Highway Safety

4.1 Personal Injury Collision Analysis

4.1.1 A search on the Department for Transport’s Crashmap database illustrates the recorded recent highway safety record in the vicinity of the site.

4.1.2 Clusters of collisions occurring in the most recent five years are found at:

- A12 / B1119 crossroads junction;
  - Eight recorded collisions, two classified as serious and six slight
- A12 / B1121 junction;
  - Three recorded collisions, one serious and two slight
- A12 Saxmundham by-pass between B1119 and B1121;
  - Three recorded collisions, one serious and two slight
- Chantry Road signals junction;
  - Four recorded slight collisions
4.1.3 Providing a single access onto the A12 to serve the site has the potential to have a more severe impact on the highway safety record on the A12 than would be the case for providing a choice of accesses on the A12 and South Entrance (which has a better highway safety record than the A12).
5.0 **Accessibility**

5.1 **Sustainable Access**

5.1.1 A key part of the masterplanning challenge for developing the allocation scheme will be to ensure good quality sustainable links to the surrounding infrastructure along with good internal permeability.

5.1.2 Along with a host of existing amenities along High Street, Saxmundham benefits from having a railway station on the East Anglia Line which provides hourly train services between Ipswich and Lowestoft. Onward services to national destinations including London can be obtained at Ipswich.

5.1.3 Both local and national policy focuses strongly on providing developments with a real choice for transport and promotion of sustainable modes is key. There exists a continuous footway between Saxmundham village centre (High Street) and railway station south along South Entrance which provides an opportunity for connection for the Garden Neighbourhood. It is considered essential for connection into the existing facilities that the Hopkins Homes land is included in the mixed-use development proposal.

5.1.4 The majority of the amenities in Saxmundham are located either along South Entrance / High Street or to the east and not utilising the Hopkins Homes land which sits adjacent to South Entrance makes providing good sustainable connections challenging.

5.1.5 Willow Consulting’s Highways and Transportation Statement (September 2018) states: "Existing PROW’s will be upgraded, and new paths provided to encourage walking and cycling through the scheme to the town centre, schools, shops, and open space. The scheme benefits from close access to the railway station with excellent connections through to Ipswich, Lowestoft, and more distant destinations." However, Hopkins Homes Land is essential in order to upgrade the existing PROWs which cross through Hopkins Homes land and link to South Entrance.

5.1.6 The Institution of Highways and Transportation’s Guidelines for Providing Journeys on Foot (2000) sets out suggested acceptable walking distances for various types of journey on foot. The preferred maximum walking distance to a town centre is set as 800m. The walking distance between the bulk of the development as set out in the emerging draft Local Plan falls outside this walking distance especially taking into consideration the requirement for pedestrians to walk across the railway line and via the Hopkins Homes lane.

5.1.7 Utilising Hopkins Homes land would serve to reducing walking distances between Saxmundham and the site considerably.
6.0 Summary and Conclusion

6.1 Summary

6.1.1 This Transport Technical Note provides comments on behalf of Hopkins Homes and the landowner in respect of the draft Saxmundham Garden Neighbourhood allocation (Policy SCLP12.29) contained in the emerging Suffolk Coastal Local Plan. This shows part of the land under Hopkins Homes’ control (Land at South Entrance) as Suitable Alternative Natural Greenspace (SANG) rather than for mixed use development as previously proposed in the First Draft version of the Plan consulted on between July and September 2018.

6.1.2 The Hopkins Homes land, along with the land to the west is considered an essential delivery mechanism in delivering the growth required for Saxmundham through the provision of land for a new Primary School early in the Plan period.

6.2 Conclusion

6.2.1 As drafted, the amended allocation would result now in an isolated scheme for 800 dwellings accessed off the A12 with no appropriate sustainable connectivity into the centre of Saxmundham.

6.2.2 Utilising the Hopkins Homes land will comply with all the relevant local transportation policy in and only by utilising the Hopkins Homes land will result in a favourable strategy for delivery of the Garden Neighbourhood.

6.2.3 A review of the strategic traffic modelling undertaken by WSP on behalf of Suffolk County Council has illustrated that the Chantry Road signals junction is a location which will require consideration as part of an emerging masterplan. Initial assessments at this location demonstrate that providing an access to the site off South Entrance would not result in a detrimental impact on the operation of the Chantry Road signals junction in the future.

6.2.4 A review of highway safety in the area illustrates that South Entrance has a better safety record than the A12 and providing a second access to the site off South Entrance will reduce the risk of an adverse impact on highway safety.

6.2.5 A review of the sustainable accessibility of the site demonstrates that the best opportunities for sustainable links between the site and Saxmundham are via South Entrance and that utilising the Hopkins Homes land is the only way to deliver this.

6.2.6 In conclusion not utilising the Hopkins Homes land for mixed use development would present a challenge for creating acceptable sustainable connections to and from Saxmundham, resulting in an unsustainable allocation which goes against policy and NPPF.
6.2.7 Therefore, the draft allocation access arrangements are unsound in terms of connecting to Saxmundham, highway capacity, road safety, accessibility and sustainability; and a link to the Hopkins Homes site is essential to resolve all of these.
APPENDIX 4 – Landscape Appraisal Briefing Note prepared by
IDP
Project number: LA3194

Project name: The Approach, Saxmundham

Date: February 2019

Client name: Hopkins Homes

Circulation: Geoff Armstrong (ARP); Robert Eburne (HH); Emily Warner (ARP);

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- LA3194-L-03D Landscape Strategy
INTRODUCTION

1.1. IDP Landscape Ltd were appointed by Hopkins Homes to provide an appraisal of the landscape and visual aspects for the proposed allocation of housing at The Approach, Saxmundham. This is to support representations made by Armstrong Rigg Planning on behalf of the client to Suffolk Coastal District Council on the publication of the new Final Draft Local Plan.

PURPOSE OF THE REPORT

1.2. This briefing note has been prepared to provide an appraisal of Policy SCLP 12.29 South Saxmundham Garden Neighbourhood within the Suffolk Coast Local Plan Final Draft (Jan 2019) and provide a review of the relevant evidence base documents that are used to support this policy. Pigeon Capital Management who represent the landowners of the remaining land parcels within the draft allocation have provided comment on the Local Plan First Draft with supporting evidence and a Concept Masterplan. The supporting evidence is also reviewed within this briefing note. This note will then provide an appraisal of the land within Hopkins Homes’ control for its suitability in terms the landscape and visual environment for its inclusion as part of the South Saxmundham Garden Neighbourhood allocation.

EXECUTIVE SUMMARY

1.3. The Hopkins Homes land holding can provide a sustainable, logical extension to the south of Saxmundham, providing substantial SANG that will be accessible to both the existing town and new residents. Development can be achieved by protecting landscape character and features setting the northern edge away from the Conservation Area boundary behind a landscape buffer. New native tree and woodland planting on the western side of the B1121 can help mitigate some of the effects on the setting of Hurts Hall and St Johns Church, by re-creating the wooded horizon in views out from these heritage features. Views towards these features from the B1121 can be retained through sensitively placed new planting on the eastern side of the B1121.

1.4. The Hopkins Homes land holding is not considered to be of high sensitivity. The land to the west of the B1121 is less sensitive as there are few value indicators and the low condition of the landscape. This land could accommodate development with potential effects mitigated through the planting of strategically placed woodland blocks, trees and new hedgerows. This planting as it matures will supplement the existing wooded boundaries that enclose the existing landscape. To the east the land lies within the shallow valley adjacent to the River Fromus, close to the listed Hurts Hall, and would be conducive to open space designed to recreate the parkland character of the former Hurts Hall Park as part of a comprehensive masterplan.
1.5. Development can be accommodated within the land west of the B1121 while maintaining a meaningful gap between the new settlement edge and the village of Benhall. This gap will provide a multifunctional role in retaining a portion of the open space known as The Layers as well as views towards Hurts Hall and St Johns Church from rights of way west of the B1121. The southern edge of the development area can be set behind new blocks of woodland planting which will in time help mitigate effects on views and landscape character at the northern edge of Benhall village. The proposed allocation would retain development to the east of the A12 in keeping with the existing pattern of settlement at Saxmundham, maintaining the undeveloped, open and rural character of the landscape to the west.
ANALYSIS

1.6. This section takes a critical review of the various evidence base documents used to support the Final Draft South Saxmundham Garden Neighbourhood (SSGN) Allocation (SCDC, Jan 2019). Each section below will set out the relevant paragraphs or polices of each document as it relates to the site and a corresponding response to each of these is provided with details how development within the Hopkins Homes land holding can be compliant.

**Suffolk Coastal Local Plan Final Draft – Policy Sclp12:29 South Saxmundham Garden Neighbourhood**

1.7. Policy Wording:

“Approximately 66.6ha 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 master plan approach brought forward through landowner collaboration and community engagement. Critical to the success of this master plan 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 master plan should be informed by community engagement and include:”

1.8. Policy Objectives (relevant to Landscape & Visual)

  d) “Project Level Habitats Regulations Assessment and a Significant Area of Suitable Alternative Natural Greenspace (SANG) Which Is Designed to Mitigate Impacts on European Protected Sites;”

1.9. The SSGN Indicative Draft Masterplan places the SANG on land between the Suffolk Coast Railway line and the B1121. This provides a large area for SANG which will be accessible to existing residents at Saxmundham town centre but its viability as an alternative recreation site for new residents will be dependent on the new connections over the railway line. The Hopkins Homes land holding can also provide a substantial SANG that will be equally well connected to the existing settlement of Saxmundham as well as potentially easier to access for new residents.

  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;”

1.10. Both sites can be developed in a way that incorporates the existing natural features within the site as well as
ample opportunity for their enhancement. Further to this there is ample opportunity for the creation of new green infrastructure elements such as trees, hedgerows, and woodland blocks. Additionally, the land parcel to the east of the B1121 provides a significant area for informal open space, circular walks, and enhancement of natural features. Sensitive and considered design of this land parcel can provide an estate parkland landscape that compliments the setting of Hurts Hall.

f) “Formal recreational opportunities to cater for all ages, including play space;”

1.11. Both sites have potential to support formal recreational opportunities for new and existing residents. The Hopkins Homes land holding has the extra potential to provide formal recreational opportunities that are accessible from the town centre.

g) “Public rights of way on the site should be preserved and enhanced;”

1.12. Both sites can be developed that preserve and enhance the existing rights of way network as well as new links and connections to the wider rural landscape. The Hopkins Homes land holding provides further opportunity to create a new network of publicly accessible footpaths on land east of the B1121 within the enhanced River Fromus corridor and newly created estate parkland in proximity to Hurts Hall.

h) “Biodiversity networks and habitats to be preserved and enhanced, including measures to enhance biodiversity within housing areas;”

1.13. Both sites can be developed that preserve and enhance the existing habitats on site. The Hopkins Homes land holding has the extra potential to provide links to and further enhancement of the River Fromus which is one of the main ecological corridors and green links in the district outside of the AONB, joining the River Alde to the south.

j) “Design and development of the site which 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, as informed by a heritage impact assessment;”

1.14. The SCDC Indicative Draft Masterplan retains development to the west of the Suffolk Coast Railway keeping the southern approach to the settlement on the B1121 undeveloped. This allocation would not likely have impacts on the setting of the conservation area or Hurts Hall or St Johns Church.
1.15. The Hopkins Homes land holding west of the B1121 can accommodate development while also achieving this objective as demonstrated by the Landscape Strategy Plan on Figure 3. This can be achieved by setting the northern edge of development away from the Conservation Area boundary behind a landscape buffer. New native tree and woodland planting either side of the B1121 can help mitigate some of the effects on the setting of Hurts Hall and St Johns Church, by recreating the characteristic wooded horizon that currently exists in views out from these heritage features.

1.16. Views towards these features from the B1121 can be retained through strategic placement of in the new planting. In addition to this, the setting of Hurts Hall can be further enhanced through the creation of an estate parkland landscape within the land parcel to the east of the B1121.

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;”

1.17. Both proposed allocation sites can be developed that can create pedestrian and cycle links that connect with the existing settlement and wider countryside. The Hopkins Homes land holding has the extra potential to provide more direct links to the High Street at Saxmundham.

**South Saxmundham Garden Neighbourhood – Indicative Draft Masterplan**

1.18. The Indicative Draft Masterplan that accompanies the final draft Policy Sclp12:29 shows development extending as far south as Kiln Lane and also land allocated for employment west of the A12. The settlement pattern in Saxmundham and in the neighbouring villages does not extend west of A12. The vegetated A12 corridor acts to screen the existing settlement from views from much of the landscape to the west.

1.19. It is described in landscape character assessments and the Landscape and Visual Appraisal (Liz Lake Associates, Sept 2018) as having an “open, rural undeveloped character”. The Landscape and Visual Appraisal states that the employment allocation “occupies higher land within the Heveningham and Knodishall Estate Character Area” and could result in impacts on this undeveloped landscape that would require mitigation. In particular views from the public footpath which passes through this part of the draft allocation would likely be impacted upon as well as other potential views from rural lanes further to the west (Deadmans Lane)


1.20. PCM represents the Landowners of the remaining land to the west of the Hopkins Homes land holding, which together comprise the most significant portion of the proposed new garden neighbourhood allocation. Liz
Lake Associates (LLA) were instructed to carry out a landscape and visual assessment of the draft allocated site. The relevant comments made by LLA regarding the Hopkins Homes land holding are quoted in italics followed by the corresponding response by IDP Landscape.

1.21. “Site Appraisal: The area east of the railway line covers an area of approximately 9.4ha which is formed of a single agricultural field with a central woodland block. The boundaries of this area are formed of mature hedgerows, with a high density of hedgerow trees along the eastern and southern boundaries, which create a sense of enclosure from the wider landscape.”

1.22. The Hopkins Homes land holding is not considered to be of high sensitivity. The land to the west of the B1121 is less sensitive as there are few value indicators and the condition of the landscape is low. This land can accommodate development through the positioning of development closer to the existing settlement of Saxmundham with effects mitigated through the planting of strategically placed woodland blocks and new hedgerows. This planting as it matures will supplement the existing wooded boundaries that enclose the existing landscape. To the east the land lies within the shallow valley adjacent to the River Fromus and close to the listed Hurts Hall, and would be conducive to open space, designed to recreate the parkland character of the former Hurts Hall Park, as part of a comprehensive masterplan.

1.23. “Visual Qualities General Descriptions: Views of the Site from the wider landscape are limited by the local topography and strong pattern of vegetation especially within the Fromus Valley around Benhall. As such Benhall appears visually separate from the Site.”

1.24. Proposed development within the Hopkins Homes land holding can retain a strategic gap between the new settlement edge of Saxmundham and Benhall. These visual qualities described above can be also retained by creating a new woodland blocks on the southern edge of new development as well as retaining views towards Hurts Hall and St Johns Church as part of the design of the recreated parkland within the SANG. The new woodland planting along the southern settlement edge can provide an ecological link between the existing isolated block of trees to the south of the site and the field boundary hedgerows.

1.25. “Scope for Mitigation: Existing landscape features within the Site, including woodland blocks, tree belts, hedgerows and hedgerow trees can be retained to provide a mature landscape structure to the development and help break up the development into discreet units. A sensitive design approach would enable an appropriate edge to be created for the southern edge of the Site to provide a separation from the village of Benhall and for the western edge to minimise the impacts of development in the undeveloped landscape.”
1.26. All of these opportunities can be realised through considerate positioning of new development east of the railway, combined with mitigation planting and careful design of the landscape within the SANG. The separation between settlements would not be compromised by retaining a strategic gap as illustrated on the Landscape Strategy on Figure 3.

1.27. **Suffolk Coastal Landscape Character Assessment – Strategy Objectives**
The Suffolk Coastal Landscape Character Assessment was published by Alison Farmer Associates in July 2018 on behalf of SCDC. This document identifies two-character areas within the Hopkins Homes land holding. The general description of each of these areas and key objectives are quoted below in italics followed by the corresponding response by IDP Landscape.

**LCA 01 - BENHALL ESTATE FARMLANDS**

**Description:**

1.28. This is a small area formed of shallow valley slopes in the wedge-shaped interfluve of the Alde and Fromus. The area is bisected by the A12 corridor which creates a sense of separation and the character to the west of the A12 is dominated by a large area of parkland - Benhall Park. The character has a strong Sandlings feel and away from the major transport corridors that pass through, it feels quiet and empty. It has a strong estate character, with block of mixed woodlands enclosing and forming a backdrop to the arable parcels or parkland.

**Protect**

1.29. “Protect this area from development, as settlement is generally not found here. Protect the character of the historic farmsteads.”

1.30. Any proposed development within the Hopkins Homes land holding can be positioned close the existing settlement edge and the rest of Garden Neighbourhood development and therefore naturally be perceived as an extension of existing settlement in approaches from the south.

1.31. “Protect the features and elements which define the estate farm landscape character, particularly its robust structure of woodland belts and hedges.”

1.32. These features can be protected and enhanced as part of the proposed SANG which can respond to setting of Hurts Hall by recreating the parkland character of the former Hurts Hall Park that once occupied the land parcel east of the B1121.
1.33. “Protect the quiet, rural character of the narrow lanes, avoiding unnecessary signage, kerbing, or widening, for example. Resist further proliferation of signage, or highways interventions, along the A12 corridor.”

1.34. Development can be set back from the B1121 (which can also accommodate existing hedge and PROW) to ensure that its rural character and unnecessary changes to the roadsides do not occur. Built form can be set behind 10m landscape buffer which will further protect the rural character of the road and valley landscape.

Plan

1.35. “Plan for enhancements to biodiversity in the agricultural landscape, perhaps opportunities that might emerge through agri-environmental schemes.”

…and...

1.36. “Plan for further restoration and enhancement of the parkland and plan for a sustainable, mixed age structure in the parkland trees.”

1.37. The planning objectives for this character area can be realised through considerate positioning of new development, mitigation planting, retaining existing landscape features and careful design of the landscape within the SANG. A new estate parkland landscape featuring new parkland trees can be incorporated within the SANG enhancing the setting of Hurts Hall.

L1 – HEVENINGHAM AND KNODISHALL EDTATE CLAYLANDS

1.38. Description:

“This is the largest character area in the district and is a landscape of quiet farmland with a simple, unified and deeply rural character. There are no large villages, only an irregular network of quiet lanes with only scattered farms and hamlets to provide any sense of settlement. The estate feel is weaker than in some parts of East Suffolk but there is a strong sense of the importance of large-scale agri-businesses which dominates land use. Some farms feature large scale indoor livestock farming. There is also a large area of parkland on the north edge of the plateau at Heveningham.”

Protect

1.39. “Protect the unspoilt, quiet, and essentially undeveloped rural character of the area. Protect the landscape from development of a scale that harms the prevailing light, scattered nature of the existing settlement.”

1.40. Any proposed development within the Hopkins Homes land holding can be positioned close the existing settlement edge and the garden neighbourhood development and therefore naturally be perceived as an
extension of existing settlement retaining the broader unbuilt characteristic of this LCA.

1.41. “Protect the plateau landscape from visual intrusion of development in areas beyond this character area e.g. from new tall vertical features such as masts or turbines or new urban development.”

1.42. The Hopkins Homes land holding is located within a valley that is contained by both topography and woodland cover. Any proposed development can be carefully positioned to avoid visual intrusion onto the plateau landscape which is nonetheless unlikely.

1.43. “Plan for the ongoing maintenance and careful management of the highly characteristic oak trees along hedges, verges and field boundaries.”

1.44. New Oak trees of local provenance can be included where appropriate to local character as part of any landscape proposals within the SANG and other proposed public open spaces.

**Suffolk Coastal Settlement Sensitivity Assessment: Volume 2**

1.45. The Suffolk Coastal Settlement Sensitivity Assessment was published by Alison Farmer Associates in July 2018 on behalf of SCDC. This document places the land within the Hopkins Homes land holding in Peripheral Area SX2. The general description of this area and sensitivity analysis under a series of headings are quoted below in italics followed by the corresponding response by IDP Landscape.

**SX2: SAXMUNDHAM**

1.46. Description: “The sensitivity of this area lies in its pronounced valley slopes which define the setting and approach to Saxmundham from the south. To the east is an area of remnant parkland while to the west is agricultural land known as The Layers which has historically been a holding area for livestock on market days and is culturally significant to the town. This approach to the town is defining both in terms of character, sense of arrival and position in the valley landscape. This area is sensitive to change due to its rural character, valued views and historic associations.”

**Landscape Patterns/Condition**

1.47. “Large to medium scale enclosures and open character. Some loss of hedgerow boundaries through lack of management and removal. Remnant parkland trees and perimeter planting to the manor.”

1.48. Hedgerow boundaries can be retained and enhanced with opportunities for new lengths within the development of this land particularly within the SANG. New parkland trees with estate parkland landscape
can also be included as part of the SANG which will contribute to the setting of Hurts Hall.

**Existing Settlement Edge**

1.49. “The southern edge of Saxmundham is well vegetated and not highly visible on approaching the town. The 20th century-built edge of Saxmundham to the west of the B1121 is not visible as it sits behind the vegetated railway line and field hedgerows/trees. There is no development within this landscape except for the mansion house of Hurts Park within a rural valley context.”

1.50. The proposed development area can be positioned in front of the existing development in views from the south and set behind a wooded edge which will in time recreate the existing characteristics of the southern settlement edge.

**Views and Visibility**

1.51. “The parkland landscape is open, affording memorable views to the rebuilt manor house (Hurts Hall) and church beyond. Views to water tower on upper western fringes of town.”

1.52. By focusing development to the western side of the B1121, views from this southern approach route and the majority of the rights of way (as well as the proposed SANG) towards these heritage features can be retained.

**Cultural and Natural Heritage**

1.53. “Association of The Layers to the historic function of the market town and tradition of holding livestock here before market. Remnant historic parkland landscape and associated mansion house and church association. Cultural association between Hurts Park and Saxmundham. Veteran trees associated with Hurts Park. River Fromus previously formed a lake as part of a designed landscape but now has a natural course.”

1.54. As above, the proposed development can be designed to respond to the existing constraints and seek to respect any cultural references. Parts of The Layers can be retained as public open space within the gap to Benhall. The course of the River Fromus can be enhanced to emphasise its natural course and a new wetland area formed as part of the SANG estate parkland design.

**Perceptual qualities**

1.55. “Strong rural river valley character unspoilt by development and notably no linear development along the road such that gateway into Saxmundham is clearly defined.”
1.56. The layout of any proposed development can avoid linear settlement along the B1121. Development can be set back from the road behind a 10m woodland buffer to preserve some of the rural character. The river valley character can be enhanced and emphasised through careful design within the SANG.

**Function**

1.57. “Important landscape as a rural approach to Saxmundham reinforcing its setting within the Fromus Valley.”

1.58. As above in paragraph 1.55.

**Opportunities**

1.59. “Reinstatement of hedgerows and landscape enhancement with possible replanting of parkland trees and restoration of parkland features to enhance the character of this area and approach to the town.”

1.60. All of these opportunities can be realised through considerate positioning of new development, mitigation planting and careful design of the landscape within the SANG recreated in the character of an estate parkland.
CONCLUSION

1.61. As described above and illustrated in the subsequent figures the Hopkins Homes land holding can accommodate development while conforming to adopted and emerging development polices and guidance as well as assisting in delivery of objectives identified for the landscape south of Saxmundham. The Hopkins Homes land holding can provide a sustainable, logical extension to Saxmundham, providing substantial SANG that will be easily accessible to the existing town and new residents. Development can be achieved while protecting the setting of key heritage assets such as Hurts Hall and the Conservation Area. The proposed allocation shown on the Landscape Strategy Plan (Figure LA3194-L-03D) would retain development to the east of the A12 in keeping with the existing pattern of settlement at Saxmundham, maintaining the undeveloped, open and rural character of the landscape to the west.

1.62. The proposed development can be placed behind a landscape buffer comprising new native tree and woodland planting on the western side of the B1121 which in time will help mitigate some of the visual effects re-creating the existing wooded horizon which appears in views out from Hurts Hall and St Johns Church. This planting will also help mitigate effects on views and landscape character at the northern edge of Benhall village. Views towards these heritage features from the B1121 can be retained through sensitively placed new planting on the eastern side of the B1121.

1.63. The parcel to the west of the B1121 is not considered to be of high sensitivity and as such is a suitable location for placing built development. Any resulting effects could be mitigated through the planting of strategically placed woodland blocks and new hedgerows. This planting, as it matures, will supplement the existing wooded boundaries that enclose the existing landscape. To the east the land lies within the shallow valley adjacent to the River Fromus and close to the listed Hurts Hall, and would be conducive to allocation as a SANG as part of a comprehensive masterplan. The design of the landscape to the east of the B1121 can take the form of an estate parkland which would be complimentary to the setting of Hurts Hall.

1.64. Development can be contained towards the north of the western parcel B1121 while maintaining a meaningful gap between the new settlement edge and the village of Benhall. This gap will also provide a multifunctional role in retaining a portion of the open space known as The Layers as well as views towards Hurts Hall and St Johns Church from rights of way west of the B1121. In summary, it is considered that the proposed allocation site and receiving environment have the ability to accommodate some level of development without resulting in undue effects, preserving the setting of key heritage features and delivering objectives for the landscape to the south of Saxmundham.
Figures

- LA3194-L-01  Site and Policy Context
- LA3194-L-02  Landscape Analysis
- LA3194-L-03D Landscape Strategy
Appendix 3

Briefing Note by Pigeon Land Holding
Project number: LA3194

Project name: Pigeon Land Holding, Saxmundham

Date: May 2019

Client name: Hopkins Homes

Circulation: Geoff Armstrong (ARP); Robert Eburne (HH); Emily Warner (ARP);

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INTRODUCTION

1.1. IDP Landscape Ltd is appointed by Hopkins Homes to provide an appraisal of the landscape and visual aspects of the representations made by Pigeon Capital Management (PCM) to the Final Draft Suffolk Coastal Local Plan in respect of the Saxmundham Garden Neighbourhood allocation. This is to support representations made by Armstrong Rigg Planning on behalf of the client to Suffolk Coastal District Council on the publication of the new Final Draft Local Plan.

PURPOSE OF THE REPORT

1.2. This briefing note has been prepared to provide a landscape and visual appraisal of Revised Site Allocation Boundary for policy SCLP12.29 South Saxmundham Garden Neighbourhood put forward by PCM who represent the landowners of the land parcels within the draft allocation. The Landscape and Visual Appraisal (Liz Lake Associates, Feb 2018) provided as supporting evidence is also reviewed within this briefing note. This appraisal focuses primarily the proposed development parcels west of the A12 and to the south of Kiln Lane as shown on the Revised Site Allocation Boundary for SCLP12.29, Site Allocation for Proposed A12 Services and Delivery Statement provided by Turley Associates Ltd (Feb 2019).

EXECUTIVE SUMMARY

1.3. The Revised Site Allocation Boundaries put forward by Pigeon Capital Management would extend the settlement of Saxmundham beyond what would be considered logical or sustainable in urban design terms. Developing the land west of the A12 would result in permanent losses of open arable fields which are accessible through public rights of way. The development of this land for employment and a new service station off the A12 has the potential to result in adverse effects on the special qualities of the local landscape as identified in the councils Landscape Character Assessments.

1.4. The Pigeon Capital Management Revised Allocation proposes extending the settlement as far south as Grays Lane and Kiln Lane. These lanes and their surrounding fields have a strong rural character and form part of part of the setting to Benhall Village. Adverse effects on visual amenity on Kiln Lane, Gray Lane and from the edge of Benhall village are also likely to occur.

1.5. The southernmost parcels would be located between 1.0 and 1.5km from the edge of from the existing settlement which would not relate well with the existing settlement or with Benhall Village. Its elongated form would create an exaggerated perception of the settlement especially in views from the east.

1.6. The Landscape and Visual Appraisal (Liz Lake Associates, Feb 2019) advises that development retains the “existing landscape features, including woodland blocks, tree belts, hedgerows, hedgerow trees and ponds...” ;
“...lower density self-build plots to be created at the southern part of the site...”; “...a narrow strip of land following the west side of the railway line to be planted to reinforce the sense of separation...” and that the “existing public footpath amenity to be protected by providing an offset from built development within a green infrastructure corridor...” These recommendations, while appropriate, all place a constraint on the developability of the southernmost parcels, whereas the Hopkins Homes Land Holding west of the B1121 would not require as limiting constraints on its development as part of an open arable field.

1.7. The settlement is largely screened from view from the A12. The employment area, services and associated highways improvements would likely result in urbanising this part of the A-road as well as extending development into the countryside to the west which is unprecedented for Saxmundham and the surrounding settlements. Introducing such unprecedented development into this landscape goes against the guidelines set out for the local Landscape Character Area L1 Heveningham and Knodishall Estate.

1.8. It is likely that resulting effects from the development west of the A12 would require mitigation planting to screen built-form which can take up to 15 years. The existing public rights of way which pass through these parcels would likely experience permanent changes to the character including the loss of openess through the replacement of arable land with built development. There would likely be a loss of amenity value from these rights of way due to proximity to built form and ancillaries associated with employment land and highways services. This would require a suitable landscape buffer and mitigation planting though there would be a permanent loss of open views and the undeveloped character of the site.

1.9. In conclusion it is not considered that the Revised Allocation in representations to made by Pigeon Capital Management would be a defensible urban extension given the landscape and visual implications that are likely to arise. The proposal for land to be promoted for housing to the western side of the B1121 would form a more suitable site for development given its proximity to the existing settlement edge, less constrained and would maintain a more suitable gap to the village of Benhall.
1.10. The proposed parcels south of Kiln Lane would introduce urban development into a landscape that has a strong rural character defined by the rising valley side topography, treed hedgerows, intimate narrow lanes and small cottages next to the railway line.

1.11. The arable fields and lanes of Kiln Lane and Greys Lane have an enclosed intimate character created by the tree lined road corridor of the A12 and nearby the woodland blocks provide the rural setting to Benhall Village. The settlement edge of Saxmundham is not visible from this location giving this area a largely undeveloped character. There are views into the southern parcels west of the railway line from the public rights of way, Forge Close and the B1121.

1.12. The wording of Policy SCLP12:29 South Saxmundham Garden Neighbourhood states that “...public rights of way on the site should be preserved and enhanced...”. While the routes of the rights of way can be preserved as part of the proposed development, there would likely be permanent losses of the undeveloped rural character on sections of the footpaths between the A12 and the railway as well as influencing the character of the landscape to the east of the railway and the setting of Benhall Village.

1.13. The policy wording also states that “...significant pedestrian and cycle accessibility throughout the site, with connections and improvements to networks beyond the site, including to the station and town centre;” and in para. 12.298 “an important aspect of any master plan development of this scale is to ensure that the relationship between the existing communities and the new development is seamless and connections between can be easily navigated through a choice of walking, cycling and vehicular routes...” and “...opportunities to encourage and facilitate use of sustainable transport in particular walking and cycling should be maximised.” The Revised Site Allocation Boundary presented by PCM extends the settlement as far south as Grays Lane up to 1.5km south from the town centre. This would relate very poorly to the existing settlement and discourage sustainable modes of transport. Development placed at the Hopkins Homes Land Holding would better realise this objective due to its location next to the existing settlement boundary and existing connections to the town centre.

1.14. Placing development within the parcels to the south of Kiln Lane would likely result in an exaggerated perception of the Saxmundham settlement in views from the east on B1121. This is illustrated in appendix 1 on viewpoints no.1, 2 and 14. The parcels south of Kiln Lane are separated from the parcels to the north by woodland blocks, hedgerows and existing detached dwellings. The parcels south of Kiln Lane were not
assessed as part of the sensitivity study of Saxmundham or Benhall which further implies how distant and poorly related to the existing settlements these land parcels are and would represent an illogical extension of the settlement boundary.

**Proposed Employment and A12 Services Allocation west of A12**

1.15. The settlement is largely screened from view from the A12. The employment area, services and associated highways improvements would likely result in urbanising this part of the A-road as well as extending development into the countryside to the west which is unprecedented for Saxmundham and the surrounding settlements. The settlement pattern in Saxmundham and in the neighbouring villages does not extend west of A12. The vegetated A12 corridor acts to screen the existing settlement from views from much of the landscape to the west.

1.16. These parcels are located within the Heveningham and Knodishall Estates Landscape Character Area (L1). It is described as having an “open, rural undeveloped character”. The Landscape and Visual Appraisal (Liz Lake Associates, Feb 2019, assessed further below) states that the employment allocation “occupies higher land within the Heveningham and Knodishall Estate Character Area” and could result in impacts on this undeveloped landscape that would require mitigation. In particular views from the public footpath which passes through this part of the draft allocation would likely be impacted upon as well as other potential views from rural lanes further to the west (Deadmans Lane).

1.17. The councils sensitivity study of land parcels surrounding Saxmundham did not assess the sensitivity of the land to the west of the A12, justifying this position by stating that “the plateau farmland to the west of the A12 has not been considered due to the firm boundary the A12 has created and open rural character of the land beyond.” (Alison Farmer Associates, Settlement Sensitivity Assessment Volume 2: Suffolk Coastal Settlements, July 2018).

1.18. The employment and services parcels are likely to result in adverse effects on visual amenity of public footpaths and rural roads west of the A12, such as Deadmans Lane, where such scale of development is unprecedented, as illustrated on viewpoints 4, 5 and 6. It is likely that resulting effects would require mitigation planting to screen built-form which can take up to 15 years. Even with mitigation planting, views of undeveloped farmland eastward from public footpaths both within the sites and in adjacent fields would be permanently lost.
1.19. Liz Lake Associates (LLA) were instructed to carry out a landscape and visual assessment of the revised allocated site. The assessment provided a summary of the local landscape character assessments (Alison Farmer Associates, July 2018) as well as a site level assessment of character, condition and value.

1.20. The parcels south of Kiln Lane are described as “...formed of a single irregular field with a small pond in the northeast corner. The A12 and Kiln Lane are lined with mature hedgerow and trees which restrict views of the Site from these routes and limit inter-visibility between the respective parcels either side of these corridors.” The proposed developments would likely open the A12 corridor and increase inter-visibility between the parcels. The boundary to the railway is described as “more open and allows inter-visibility between the central area and the area to the east of the railway line.” The “area east of the railway line” forms an important part of the setting of Benhall Village and includes the B1121 and two rights of way from which there are views into the site. Photography demonstrating this intervisibility from Greys Lane, public rights of way, Forge Close and B1121 are included in Appendix 1 (Viewpoints 1, 2 and 14).

1.21. LLA produced a Landscape Concept Plan along several key design principles to reduce or mitigate the effects of development. These key principles include the provision of linear belts along the boundaries with the railway line to ensure the distinct sense of separation between Saxmundham and Benhall. However, the Hopkins Homes land-holding as an alternative would more effectively retain settlement separation without resulting in effects on the setting of Benhall in the short to long term.

1.22. LLA recommend a low-density development to the southern parcels enclosed by green infrastructure as well as protecting the existing amenity of the public rights of way within the site through offsetting development from these routes. The combination of these requirements place a limiting constraint on development within the southern parcels. The Hopkins Homes Land Holding would not have such a constraint on its development, able to deliver housing at a higher density.

1.23. Regarding the proposed allocation west of the A12, the site appraisal states that this land “occupies higher land within the Heveningham and Knodishall Estate Character Area and has an open, rural and undeveloped character. In the summary of the Suffolk Coastal District Landscape Character Assessment, (Alison Farmer Associates 2018) for LCA L1 Heveningham and Knodishall Estates the Special Qualites and Features of this LCA are described as “a peaceful, deeply rural ‘backwater’ focused on farming...” and “there is little intrusion from modern development...” and “...the remoteness of the area has helped protect it from development pressure, and it has likely changed little in the 20th and 21st centuries.”
1.24. The strategic objectives for this LCA include the following:

- “Protect the unspoilt, quiet, and essentially undeveloped rural character of the area;
- Protect the plateau landscape from visual intrusion of development in areas beyond this character area e.g. from new tall vertical features such as masts or turbines or new urban development; and
- Protect the landscape from development of a scale that harms the prevailing light, scattered nature of the existing settlement.”

1.25. Introducing employment development and the A12 services into this landscape character area would erode the special qualities identified above within the landscape west of the A12. This would be due to the likely removal of arable land, hedgerows, trees and subsequent introduction of potentially intrusive features associated with such developments such as warehouse and retail units, canopies, lighting, HGV parking and other ancillary features. The extent of where this special quality character is most apparent is shown on PCM Land Holding landscape Analysis Plan (Figure 02, Appendix 1) which includes the PCM Land Holding.

1.26. The likely proximity of the existing public footpaths to service yards and vehicular parking and such features associated with these developments would likely require a substantial landscape buffer and enhancement measures to retain the amenity of these routes though the existing character of the landscape through which they pass would be irreversibly altered.

CONCLUSION

1.27. As described above and illustrated in the subsequent figures the revised allocation extends the proposed residential area of Saxmundham beyond what would be considered logical in urban design terms or sustainable.

1.28. Developing the land west of the A12 would result in the permanent loss of open arable fields with rights of way running through them, which is likely to result in adverse effects on the special qualities of the local landscape as identified in the councils Landscape Character Assessments.

1.29. Extending the settlement south is also likely to have adverse effects, as Grays Lane and Kiln Lane and the surrounding fields have a strong rural character and form part of part of the setting to Benhall Village. The southernmost parcels would be located between 1.0 and 1.5km from the edge of from the existing settlement which would not relate well with the existing settlement or with Benhall Village. Its elongated form would
create an exaggerated perception of the settlement especially in views from the east and west. The southernmost parcels are separated from the remaining allocation to the north by hedgerows woodland blocks and existing housing.

1.30. There would be a loss of amenity value from the public rights of way due to proximity to built form and ancillaries associated with employment land and highways services. This would require a suitable landscape buffer and mitigation planting though there would be a permanent loss of open views and the undeveloped character of the site.

1.31. In conclusion it is not considered that the Revised Allocation in representations to made by Pigeon Capital Management would be a defensible urban extension given the landscape and visual implications that are likely to arise. The proposal for land to be promoted for housing to the western side of the B1121 would form a more suitable site for development given its proximity to the existing settlement edge, less constrained and would maintain a more suitable gap to the village of Benhall.
Figures

- Figure 01  Viewpoint Location Plan & Photopanels
- Figure 02  PCM Landholding Landscape Analysis
**Viewpoint 1**
- **Location of view:** Forge Close, Benhall
- **Date:** 29/05/19
- **Notes:** Overcast, high cloud, good visibility
- **Receptors:** Road Users/Residents
- **Distance from site:** 300m

**Viewpoint 2**
- **Location of view:** Greys Lane, Benhall
- **Date:** 29/05/19
- **Notes:** Overcast, high cloud, good visibility
- **Receptors:** Walkers
- **Distance from site:** 95m

---

**LA3194 Saxmundham South Entrance**

**Figure 1.1: Viewpoints 1-2**

- **Camera:** Canon EOS 450D
- **Focal Length:** 35 mm
- **Horizontal Field of View:** 110 degrees
- **Reproduction:** A3 landscape
### Viewpoint 3
- **Location of view:** Greys Lane, Benhall
- **Date:** 29/05/19
- **Notes:** Overcast, high cloud, good visibility
- **Receptors:** Road Users
- **Distance from site:** 5m

### Viewpoint 4
- **Location of view:** Public Right of Way west of the A12
- **Date:** 29/05/19
- **Notes:** Overcast, high cloud, good visibility
- **Receptors:** Walkers
- **Distance from site:** 100m
**Viewpoint 5**

**Location of view:** Deadmans Lane, looking southeast towards site

**Notes:** Overcast, high cloud, good visibility

**Date and Time:** 29/05/19

**Receptors:** Road Users

**Distance from site:** 380m

**Viewpoint 6**

**Location of view:** Public Right of Way west of the A12

**Notes:** Overcast, high cloud, good visibility

**Date:** 29/05/19

**Receptors:** Walkers

**Distance from site:** 210m
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<td>Viewpoint 7</td>
<td>Public Right of Way west of the A12 within the PCM site</td>
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<td>0m</td>
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### Viewpoint 9
- **Location of View:** A12 and Public footpath, looking northwest towards parcels west of A12
- **Notes:** Overcast, high cloud, good visibility
- **Date and Time:** 29/05/19
- **Receptors:** Road Users, Walkers
- **Distance from Site:** 10m
- **OS Coordinates:**

### Viewpoint 10
- **Location of View:** Public footpath east of A12 near Kiln Lane looking south
- **Notes:** Overcast, high cloud, good visibility
- **Date and Time:** 29/05/19
- **Receptors:** Walkers
- **Distance from Site:** 0m
- **OS Coordinates:**

---

**LA3194 Saxmundham South Entrance**

**Figure 1.5: Viewpoints 9-10**

**Camera:** Canon EOS 450D

**Focal Length:** 35 mm

**Horizontal Field of View:** 110 degrees

**Reproduction:** A3 landscape
### Viewpoint 11
- **Location of view:** Kiln Lane within the PCM site, looking south east
- **Date:** 29/05/19
- **Notes:** Overcast, high cloud, good visibility
- **Receptors:** Walkers
- **Distance from site:** 0m

### Viewpoint 12
- **Location of view:** Kiln Lane within the PCM site, looking east
- **Date:** 29/10/19
- **Notes:** Overcast, high cloud, good visibility
- **Receptors:** Walkers
- **Distance from site:** 0m
**Viewpoint 13**

- **Location of view:** Public footpath south of Kiln Lane looking south west towards PCM site
- **Date:** 29/05/19
- **Notes:** Overcast, high cloud, good visibility
- **Receptors:** Walkers
- **Distance from site:** 290m

**Viewpoint 14**

- **Location of view:** B1121 pedestrian footpath looking west towards PCM site
- **Date:** 29/05/19
- **Notes:** Overcast, high cloud, good visibility
- **Receptors:** Road Users, Walkers
- **Distance from site:** 325m

---

**LA3194 Saxmundham South Entrance**

**Figure 1.7: Viewpoints 13-14**

**Camera:** Canon EOS 450D
**Focal Length:** 35 mm
**Horizontal Field of View:** 110 degrees
**Reproduction:** A3 landscape
Figure 02

PCM Revised Allocation Landscape Analysis

Revised allocation boundary
A12 services allocation boundary
Landscape setting to Benhall Village
'Undeveloped' landscape characteristic west of A12
Landscape Character Area Boundary
Key views

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Appendix 4

Saxmundham Transport Technical Note
Suffolk Coastal Draft Local Plan,
Saxmundham Garden Village,
Transport Matters
### Document control

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**Project:** Saxmundham Garden Neighbourhood  
**Document:** Transport Technical Note (for Draft Local Plan Examination)  
**Client:** Hopkins Homes Limited  
**Job Number:** A112308  
**Revision:** Draft  
**Date:** May 2019
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1.0 Introduction

1.1 Background

1.1.1 In February 2019 WYG prepared a Transport Technical Note (TN01c) which provided comments on the draft Saxmundham Garden Neighbourhood allocation in the Suffolk Coastal Draft Local Plan (Policy reference SCLP12.29). Information reviewed as part of TN01c included a Highways & Transportation Statement prepared by Willow Consulting (Dated September 2018) and a Local Plan Modelling Methodology Report (WSP).

1.1.2 TN01c advised that land under Hopkins Homes control (Land at South Entrance), to the east of the railway line, south of Saxmundham is an essential delivery mechanism in delivering the growth required for Saxmundham.

1.1.3 Since February 2019 the Suffolk Coastal Draft Local Plan along with all accompanying representations has been submitted for examination.

1.1.4 Representations made on behalf of Pigeon Capital Management, who are promoting land to the west of the railway and not the land under Hopkins Homes control, includes an updated ‘Highways & Transport Statement’ prepared by Willow Consulting (Dated February 2019) and a ‘Delivery Statement’ prepared by Turley.

1.1.5 This Transport Technical Note provides transportation-related commentary on the additional information submitted as representations and should be read alongside TN01c as the conclusions drawn in TN01c remain relevant for consideration for the examination of the draft local plan (and in particular Policy SCLP12.29).

1.1.6 As drafted, the land allocation for the proposed Saxmundham Garden Neighbourhood would result in an isolated scheme for 800 dwellings accessed off the A12 with no appropriate sustainable connectivity into the centre of Saxmundham. 700 dwellings solely being served from a new roundabout access of the A12 is considered inappropriate due to the isolation from Saxmundham.
2.0 Local Transportation Policy Review

2.1 Introduction

2.1.1 In addition to the local transportation policy review contained in TN01c, a review of the draft wording for Policy SCLP12.29, relating to the Saxmundham Garden Neighbourhood has been undertaken.

2.2 Suffolk Coastal Draft Local Plan

Policy SCLP12.29 Commentary

2.2.1 Paragraph 12.284 states:

“It is essential that this Local Plan retains these principles and to do this there is an opportunity to take a master plan approach, informed by public engagement and multiple land owner collaboration, to deliver an education and employment led sustainable garden neighbourhood as an extension to the existing built up area, including land within the parish of Benhall.”

2.2.2 The approach adopted by Pigeon excludes local landowners and will result in a development which is segregated from the existing community in Saxmundham, rather than become an extension to it.

2.2.3 Paragraph 12.298 states:

“An important aspect of any master plan development of this scale is to ensure that the relationship between the existing communities and the new development is seamless and connections between can be easily navigated through a choice of walking, cycling and vehicular routes. Integrating new connections with the existing network of roads and footpaths will provide opportunities to enhance the area and encourage ease of movement for all.”

2.2.4 Developing solely the land promoted by Pigeon cannot result in a development with seamless connections to the existing communities by virtue of the only vehicular access being a new one onto the main strategic by-pass of Saxmundham (A12). Walking and cycling routes between the proposed site and the existing facilities in Saxmundham would be convoluted, long and require navigation of some sections of sub-standard footways and narrow streets.
Paragraph 12.299 states:

“Opportunities to encourage and facilitate use of sustainable transport in particular walking and cycling should be maximised.”

The Highways & Transportation Statement produced by Willow Consulting on behalf of the Pigeon proposals mentions investigating a demand responsive bus service. This type of service is not currently offered by operators in this area and it is unlikely that the demand for such a service arising from this development would make it viable for an operator to implement.

Only by utilising land close to South Entrance (the Hopkins Homes land) can a legible pedestrian route between the development and the existing facilities in Saxmundham and along with reasonable access for future residents of the development to a bus service be provided.
3.0 Review of Information Submitted as Representations

3.1 Delivery Statement (Turley)

3.1.1 The Delivery Statement mentions that the scheme promoted by Pigeon seeks to reduce the level of out-commuting however promoting vehicle connection only to the A12 is conducive to promoting out-commuting, particularly for future residents of the proposed new development.

3.1.2 The Delivery Statement goes on to state that promotion of access to the A12 avoids reliance on the local transport network, a strategy which does not accord with policies and objectives in the Local Plan.

3.1.3 The Delivery Statement describes the series of pedestrian and cycle routes ‘seamlessly’ connecting the site with the existing town. No walking or cycle distances are mentioned and the most direct route to the existing local facilities is via the Hopkins Homes land. Southern and western sections of the development area would be well in excess of 800m from existing facilities in Saxmundham especially when taking into consideration the potential internal road layouts.

3.1.4 The Delivery Statement mentions the development as ‘self-contained’. This does not lend to an inclusive or integrated development as aspired to in the Local Plan.

3.1.5 The Delivery Statement describes new pedestrian and cycle links providing access to the centre of Saxmundham and the railway and bus stations, but no mention of their deliverability and potential walking or cycle distances are mentioned.

3.1.6 The walking distances for the majority of the proposed development area to existing facilities in Saxmundham are in excess of those considered acceptable for leisure or commuting trips as set out in The Institution of Highways and Transportation’s Guidelines for Providing Journeys on Foot (2000), which sets out the preferred maximum walking distance to a town or village centre as 800m.

3.1.7 The strategy of all vehicle trips routing via the A12 creates segregation from Saxmundham, especially as the only sustainable access to the existing facilities would require excessive walking distances.

3.1.8 The benefits of pursuing improvements to the Kiln Lane level crossing for pedestrians and cyclists is questionable given that this would take users further away from the facilities in Saxmundham.

3.1.9 The Delivery Statement mentions that car travel will be actively discouraged, however providing direct access to the main, strategic through-route (A12) is likely to encourage car travel to destinations away from Saxmundham.
3.2 Highways & Transportation Statement (February 2019, Willow Consulting)

3.2.1 The report is light on detail with respect to how the Pigeon proposals accord with local policy. There are sections of Policy SCLP12.29 which the proposals do not meet (paragraphs 12.284, 12.298 and 12.299).

3.2.2 A new 4-arm roundabout along the A12 is proposed, which will provide access to both the proposed Garden Neighbourhood and also employment land and service area (including fuel filling station) to the west of the A12. It is asserted that a roundabout can accommodate all traffic associated with both the Garden Neighbourhood and employment land to the west.

3.2.3 The strategic modelling undertaken by WSP is high level and more focussed assessment will be required at key junctions including the proposed site access roundabout on the A12, the A12 / B1119 staggered crossroads, the A12 / B1121 T-junction and the Chantry Road signalled crossroads junction as part of any planning application.

3.2.4 An assessment of the proposed access roundabout has been undertaken and included as an Appendix to the report. The assumptions used with respect to traffic generation associated with the development proposals all seem reasonable and robust. Given that the results of the assessment see the A12 southern approach to the roundabout approaching capacity during the weekday AM peak, the proposed design of the site access roundabout may need to be altered to accommodate this.

3.2.5 No assessment of the other junctions in the vicinity of the site have been assessed yet and no detail of the potential vehicle trip distribution has been provided. An assessment of the key local junctions during a weekend peak is also likely to be required.

3.2.6 The report mentions that the initial section of road from the A12 roundabout into the Garden Neighbourhood site will be a 7.3m wide single carriageway allowing emergency vehicle access in the event that the road carriageway is full.

3.2.7 Given that this section of road would provide the sole vehicular access to the site, it would need to be designed in such a way so as to ensure safe access can be attained in the event of a part blockage or point closure. A preferable solution for a development of this scale would be to provide a second vehicle access point as set out in the Suffolk Design Guide for Residential Areas.

3.2.8 A secondary access is proposed through to Kiln Lane. However, this access would provide access to up to 100 dwellings in isolation on the southernmost section of the Pigeon promoted site only and there would be no vehicle connection through to the remainder of the development, thereby creating a somewhat isolated section of the development.
3.2.9 In its current form, Kiln Lane is a single track, approximately 3m wide with no footways and would therefore require upgrading in order to function as a residential access road. A new right turn access off the A12 at this location would bring about potential impacts on highway safety and further segregating this section of the development would make it even more isolated from Saxmundham than the remainder of the site.

3.2.10 A connection between the Kiln Lane access and the main site is proposed for use by pedestrians and cyclists only. It is proposed that removable bollards are installed to prevent regular vehicle use but to enable emergency vehicle use. These arrangements often result in miss-use, can encourage fly-tipping and illegal parking and anti-social behaviour and the practicality for use by emergency vehicles is questionable.

3.2.11 The concept plan included at Appendix B of the report highlights the segregation for the southern part of the site and outlines a dead-end in the northern section of the site along with a road which appears to lead towards private properties off Fisher Close.

3.2.12 The public transport strategy for a development of this scale is insufficient. Current bus services run along South Entrance, but by promoting land only to the west of the railway line, the development area is being moved away from the existing provision as large sections of the development would fall well outside of the recommended 400m walk from the nearest bus stops.

3.2.13 The prospect of introducing a demand responsive new bus service is currently unrealistic as this type of service is not offered by any local operator. It would be difficult for any new service to navigate through the development site owing to there being only a single access point into the site from the existing network, away from any existing service routes.

3.2.14 The sustainable access strategy (walking and cycling) is also insufficient. Whilst internal site permeability can be designed according to the standards set out in the Suffolk Design Guide for Residential Areas, external links to the existing facilities (including Tesco and Waitrose off Church Hill and the railway station) are convoluted and in some places sub-standard.

3.2.15 The assumption that no vehicle trips associated with the development would impact the Chantry Road signals junction is unrealistic especially given the distance between the existing facilities in Saxmundham and parts of the development site. In order to get from the development to town centre facilities such as Tesco and Waitrose, it is necessary to travel through the Chantry Road signals junction. There are also likely to be linked / onwards trips associated with the school and employment areas, which could also impact on the Chantry Road signals junction.
4.0 **Highways Capacity**

4.1 **The Suffolk County Transport Model**

4.1.1 As detailed in TN01c, the SCTM must be considered sound, however the model provides a high-level overview of the likely traffic situation based on a number of assumptions. Any planning application for individual development in the area must be supported by a detailed assessment of key identified local junctions.

4.2 **Chantry Road Signals Junction**

4.2.1 As detailed in TN01c, a preliminary assessment of this junction has been undertaken and the details of this assessment can be made available on request. Whilst this assessment demonstrated that the junction would operate satisfactorily into the future following introduction of traffic associated with residential development on land south of Saxmundham, no additional employment trips on land to the west of the A12 were taken account of.

4.2.2 An updated LinSig assessment at the junction would be required in order to assess the impacts of trips associated with the proposed residential and employment developments on the junction.

4.3 **Site Access / A12 Roundabout**

4.3.1 A high-level assessment of the proposed site access roundabout has been undertaken utilising what is considered to be robust levels of traffic associated with the proposed development.

4.3.2 Despite this no details have been provided with respect to distribution and assignment of development traffic on the local network and as such further investigation would be required to determine if the proposed site access roundabout could accommodate theoretical traffic flows in the design scenario.

4.4 **Additional Local Junction Assessments**

4.4.1 Additional local junctions would require assessment in order for Suffolk County Council to determine the traffic impact of the proposed development and whether any proposed mitigation is suitable. These are likely to include at least:

- A12 / B1119 staggered crossroads;
- A12 / Kiln Lane; and
- A12 / B1121 T-junction
5.0 Highway Safety

5.1 Personal Injury Collision Analysis

5.1.1 A review of highway safety included in TN01c determined that there are currently no unexpected trends with respect to recorded personal injury collisions in the area.

5.1.2 Providing a single access onto the A12 to serve the majority of the residential land, employment and service area has the potential to have a more severe impact on the highway safety record on the A12 than would be the case for providing a choice of accesses on the A12 and South Entrance (which has a better highway safety record than the A12).
6.0 Accessibility

6.1 Sustainable Access

6.1.1 As detailed in TN01c and highlighted in local policy, providing good quality sustainable links to the surrounding infrastructure is key.

6.1.2 Existing shopping facilities in Saxmundham are located along High Street (north of the Chantry Road signals junction), and Church Hill (east of the Chantry Road signals junction) and the most direct route to these locations from the development site would be via South Entrance. Moving the development area further southwest to the west of the railway line creates more distance between existing facilities and the development area.

6.1.3 The Institution of Highways and Transportation’s Guidelines for Providing Journeys on Foot (2000) sets out suggested acceptable walking distances for various types of journey on foot. The preferred maximum walking distance to a town centre is set as 800m and to bus services 400m. The walking distance between the bulk of the development as set out in the emerging draft Local Plan falls outside this walking distance especially taking into consideration the requirement for pedestrians to walk across the railway line and via the Hopkins Homes land.

6.1.4 Utilising Hopkins Homes land would serve to reducing walking distances between Saxmundham and the site considerably.

6.1.5 The closest existing bus stops are located on South Entrance approximately 200m north of the northern extent of the Hopkins Homes land.

6.1.6 Saxmundham railway station is approximately 600m walk from the northern extent of Hopkins Homes land and an additional 300m from the edge of the land promoted by Pigeon (via the PROW which crosses the Hopkins Homes Land).
7.0 Summary and Conclusion

7.1 Summary

7.1.1 In February 2019 WYG prepared a Transport Technical Note (TN01c) which provided comments on the draft Saxmundham Garden Neighbourhood allocation in the Suffolk Coastal Draft Local Plan (Policy reference SCLP12.29).

7.1.2 TN01c advised that land under Hopkins Homes control (Land at South Entrance), to the east of the railway line, south of Saxmundham is an essential delivery mechanism in delivering the growth required for Saxmundham.

7.1.3 Since February 2019 the Suffolk Coastal Draft Local Plan along with all accompanying representations has been submitted for examination.

7.1.4 Representations made on behalf of Pigeon Capital Management, who are promoting land to the west of the railway and not the land under Hopkins Homes control, includes an updated ‘Highways & Transport Statement’ prepared by Willow Consulting and a ‘Delivery Statement’ prepared by Turley.

7.1.5 This Transport Technical Note (TN02) has provided a review of the submitted documentation along with an updated overview of sustainable access, highway safety and highway capacity consideration for the Saxmundham Garden Neighbourhood.

7.2 Conclusion

7.2.1 The proposed allocation would result in an isolated scheme for 800 dwellings accessed off the A12 with no appropriate sustainable connectivity into the centre of Saxmundham.

7.2.2 Utilising the Hopkins Homes land will comply with all the relevant local transportation policy and only by utilising the Hopkins Homes land will result in a favourable strategy for delivery of the Garden Neighbourhood.

7.2.3 A review of highway safety in the area illustrates that South Entrance has a better safety record than the A12 and providing a second access to the site off South Entrance will reduce the risk of an adverse impact on highway safety.

7.2.4 A review of the sustainable accessibility of the site demonstrates that the best opportunities for sustainable links between the site and Saxmundham are via South Entrance and that utilising the Hopkins Homes land is the only way to deliver this.

7.2.5 In conclusion not utilising the Hopkins Homes land for mixed use development would present a challenge for creating acceptable sustainable connections to and from Saxmundham, resulting in an unsustainable allocation which goes against policy and NPPF.
Saxmundham Garden Neighbourhood, Transport Matters

7.2.6 The draft allocation access arrangements are unsound in terms of connecting to Saxmundham, highway capacity, road safety, accessibility and sustainability; and a link to the Hopkins Homes site is essential to resolve all of these.
HEARING STATEMENT

Examination of the Suffolk Coastal District Local Plan

On behalf of:

Hopkins Homes

In respect of:

Matter 3 Development Allocations (Policy SCLP12.33 Woodbridge Town Football Club)

Date:

July 2019

Document Reference:

GA/EW/05017/S0007
1.0 INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of our client Hopkins Homes in respect of Matter 3 Development Allocations (Policy SCLP12.33 Woodbridge Town Football Club) of the Inspector’s Matters, Issues and Questions for the Examination of the Suffolk Coastal District Local Plan.

1.2 The Statement is intended to assist the Inspector’s consideration of the legal compliance and soundness of the Plan and will form the basis of the discussion at the Examination Hearing session on 5th September 2019.

2. ISSUE – ARE THE PROPOSED AREA SPECIFIC STRATEGIES, ALLOCATIONS AND POLICIES JUSTIFIED, EFFECTIVE AND CONSISTENT WITH NATIONAL POLICY?

Question 3.45
Is paragraph 12.350 consistent with Policy SCLP12.33 in that it refers to the relocated facilities being ‘within the town’? Is this justified?

2.1 The requirement in the supporting text at 12.350 which refers to the relocated facilities being ‘within the town’ is not consistent with Policy SCLP12.33 or justified.

2.2 In discussions with the Council, it has been agreed that available land within Woodbridge town itself is limited and that in order to provide maximum flexibility for a replacement site to come forward, the supporting text at 12.350 should be amended to allow for replacement sites to be located outside the town. Such situation is not unusual as evidenced by the location of the Woodbridge Rugby Club on Orford Road in an isolated position some 5km to the east of the centre of Woodbridge. This change will ensure that the policy is effective and deliverable over the plan period, and therefore sound.

2.3 A draft Statement of Common Ground prepared jointly between Hopkins Homes, East Suffolk Council and Woodbridge Town Football Club has been prepared to confirm this change. The parties have also agreed that in order to provide greater certainty, the policy should be subject to a separate criteria based approach against which a suitable relocation site would be assessed. At the time of writing, the wording of two of the proposed replacement facility criteria (shown in red) have not been agreed however it is expected that a Statement of Common Ground can be finalised before or during the Hearing Statements. The current draft is included for the Inspector’s information at Appendix 1.
**Question 3.46**

*Would the Policy be effective in conserving the significance of designated heritage assets?*

2.4 This Statement is accompanied by the attached Heritage Supporting Statement at Appendix 2 by Barton Willmore which has been prepared to consider the historic environment implications of Policy SCLP12.33 and demonstrates that the site can be developed without any undue adverse heritage impacts.

2.5 The Statement assesses the history, significance and setting of the Grade II* Seckford Hall, as well as the associated Grade II listed Barn and Lodge which are within 500m of the site. The Statement confirms that there is no material visual connectivity between the site and Seckford Hall itself and that it is physically and functionally separate from it such that the site does not make any contribution to the significance of the designated heritage assets.

2.6 Whilst it has been identified that there is the potential for any tall structures to be visible along the western edge of the site in easterly views from Seckford Hall, any impact would be limited and can be appropriately mitigated through careful control of scale, massing and layout and landscaping treatment. The policy wording includes provision to ensure that development on the site responds appropriately to its landscape character specifically through the retention and strengthening of the existing landscaping and trees on the perimeter of the site and confirms the expectation that the built part of the development would be located in the north of the site and be of a height and layout that respects its position in the landscape. These considerations would equally conserve the significance of the designated heritage assets.

2.7 The Statement concludes that, subject to detailed design, development on the site can be accommodated with no adverse impact on designated heritage assets. The allocation is therefore in line with the objectives of paragraph 185 of the NPPF and does not warrant heritage specific heritage provision within the wording of the policy.

**General Question**

*Is the site allocation and its criteria justified and appropriate in all aspects, having regard to the likely impacts of the development and potential constraints?*

2.8 In terms of the policy requirement (criteria a) for the housing mix to include an unspecified proportion of housing suitable for the elderly population, please refer to our Hearing Statement on behalf of Hopkins Homes to Matter 4 Policies (Policy SCLP5.8 Housing Mix). This sets out that the Council’s approach to meeting the housing needs of the elderly is considered deeply flawed, would be ineffective in meeting actual needs and that no evidence has been presented that due consideration has been
given to any actual assessed need or demand for housing to meet the needs of the older population in certain locations. Accordingly, it is considered that this criterion is not based upon objectively assessed development requirements or proportionate evidence and is therefore not positively prepared or justified.

**General Question**

*Are there any significant factors that indicate that the site should not be allocated? Is there a risk that site conditions, infrastructure or access requirements or constraints, might prevent development or adversely affect viability and delivery?*

2.9 There are no significant constraints to development that indicate the site should not be allocated.

2.10 Hopkins Homes has a long term interest in the site having promoted it for residential development for many years and have undertaken a series of pre-application discussions and public consultation events. Hopkins Homes is committed to bringing the site forward at the earliest opportunity to enable the delivery of a sustainable development and the provision of significant economic, social or environmental gains for the area.

2.11 The site is a suitable and deliverable residential site which is well related to the settlement and has no insurmountable constraints to development which, subject to the suitable replacement of the football club, can assist in meeting the District’s housing needs over the Plan period in a sustainable manner.
Appendix 1

Draft Statement of Common Ground
DRAFT Statement of Common Ground between East Suffolk Council, Hopkins Homes and Woodbridge Town Football Club

Matters relating to Policy SCLP12.33 Land at Woodbridge Town Football Club

Local Plan covering the former Suffolk Coastal area

July 2019
Purpose of Statement

1 This Statement of Common Ground has been produced to advise the Inspector on the agreed position in relation to the delivery of Policy SCLP12.33 Land at Woodbridge Town Football Club. This Statement has been prepared between East Suffolk Council, Hopkins Homes and Woodbridge Town Football Club.

2 Representations relevant to this Statement of Common Ground are set out below:

   • Representations to Suffolk Coastal Local Plan Final Draft by Armstrong Rigg Planning on behalf of Hopkins Homes (Rep ID: 1280) (Inspector’s question 3.45)

The Site

3 The site is currently occupied by Woodbridge Town Football Club. The Plan acknowledges that a new location for the football club will need to be identified during the Plan period.

4 The site is 4.16ha in size and is expected to provide 120 dwellings subject to the suitable relocation of the football club. The policy wording states that replacement facilities for the football club must provide equivalent or better provision of football club facilities within a location which is accessible to the community by non-car modes of transport. The supporting text at 12.350 refers to the relocated facilities being ‘within the town.’

Agreed Position

5 The parties agree that the phrase ‘within the town’ in paragraph 12.350 is not presently defined.

6 The parties agree that in order to provide greater certainty, the policy should be subject to a separate criteria based approach against which a suitable relocation site would be assessed.

7 The parties consider, with the following modifications below, the plan is sound in respect of matters relating to the replacement of the football club.

8 Deletions to text is shown crossed out, additional text is shown underlined.

Policy SCLP12.33: Land at Woodbridge Town Football Club

Changes to supporting text

12.350. The site is currently occupied by Woodbridge Town Football Club however it is acknowledged that a new location for the football club will need to be identified during the
Local Plan period. The allocation of this site is intended to provide a degree of certainty to the football club and the community in identifying options for relocation of the site. Critical to the policy is that the development of the site would only be supported as part of a comprehensive scheme within which the football club is facilitated in relocating to a suitable location in compliance with the criteria set out in the policy, within the town, which is accessible by non-car modes of transport.

**Changes to policy**

4.16ha of land at Woodbridge Town Football Club is allocated for housing for approximately 120 dwellings associated with the relocation of the football club. Development will only be supported as part of a proposal which would establish suitable replacement facilities for the football club, which provide equivalent or better provision of football club facilities within a location which is accessible to the community by non-car modes of transport.

Development on the site allocated under this policy will be expected to comply with the following criteria:

a) Provision of a mix of housing including housing suitable to meet the needs of the elderly population and including affordable housing;
b) Design, layout and height of buildings appropriate to the site’s location adjacent to the Area of Outstanding Natural Beauty;
c) Retention and strengthening of the existing landscaping and trees on the perimeter of the site;
d) Provision of open space providing opportunities for all ages;
e) An archaeological assessment will be required;
f) A site-specific Flood Risk Assessment will be required;
g) A project level Habitats Regulations Assessment will be required;
h) Provision of a robust package of sustainable transport measures which promote connectivity with the town; and
i) Access to be provided via Fynn Road.

Proposals for the relocation of the football club will be expected to comply with the following criteria:

j) **Demonstration of how the football club will be replaced in a way which provides equivalent or better provision;**
k) The replacement facility must be fully brought into use in advance of the loss of any existing facilities to ensure continuity of provision;
l) An appropriate highways access should be provided;
m) The site must be accessible to the community by non-car modes of transport;
n) **There should be no unacceptable impact on the amenity of any adjoining residential uses in terms of noise and light pollution; and**
o) An appropriate landscape mitigation scheme should be provided if necessary.
## Signatures

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Appendix 2

Heritage Supporting Statement
Land at Woodbridge Town Football Club

Heritage Supporting Statement

July 2019
# Land at Woodbridge Town Football Club

## Heritage Supporting Statement

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<tr>
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<td>Authorised by:</td>
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1.0 Introduction
2.0 Designated Heritage Assets
3.0 Analysis: Principle of Development
4.0 Conclusions

APPENDICES

Appendix 1: Historic Maps
Appendix 2: List Descriptions
1.0 INTRODUCTION

1.1 This Heritage Supporting Statement has been prepared by Joanna Burton IHBC, on behalf of Hopkins Homes to consider the historic environment implications of draft Suffolk Coastal Local Plan Policy SCLP23.33 Land at Woodbridge Town Football Club (Fig. 1).

1.2 The 4.16ha site is located to the south of the urban edge of Woodbridge. It is bounded to the north by residential development and to the east and west by the B1438 and A12 respectively. There are no designated heritage assets within the site or immediate proximity. Within 500m of the site are four Grade II listed buildings, and one Grade II* listed building.

1.3 The land is being promoted through the current local plan process as Site SCLP12.33 Land at Woodbridge Town Football Club (the site) for 120 dwellings. The Final Draft Plan has been submitted to the Inspectorate for Examination in Public, with hearings scheduled Summer 2019 and adoption by November/December 2019.

1.4 Paragraph 11 of the National Planning Policy Framework (NPPF) (2019) sets out a presumption in favour of sustainable development for plan-making and decision-taking. For plan-making, this means that plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.
Strategic policies should provide for objectively assessed needs for housing and other uses, unless the application of NPPF policies for the protection of areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area. Or, any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole. Such areas or assets of importance include designated heritage assets.

1.5 Paragraph 185 of the NPPF states that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
c) the desirability of new development making a positive contribution to local character and distinctiveness; and
d) opportunities to draw on the contribution made by the historic environment to the character of a place.

1.6 This Statement has been prepared to aid the Inspector and seeks to demonstrate that the draft policy is fit for purpose and that Site SCLP12.33 can be developed without any undue adverse heritage impacts.

1.7 It has been informed by a site visit undertaken on 12 July 2019 together with desk-top research including a review of the historic Ordnance Survey (OS) plans.
2.0 DESIGNATED HERITAGE ASSETS

Identified Heritage Assets

Fig. 1. Heritage constraints

2.1 Within 500m of Site SCLP12.33 are five designated heritage assets as follows:

- Seckford Hall, Grade II* listed;
- Barn at Seckford Hall and Spur Wall, Grade II listed;
- Seckford Hall Lodge, Grade II listed;
Identified Heritage Constraints

- No.1 Top Street, Grade II listed; and
- Sluice Farmhouse, Grade II listed.

2.2 Full list descriptions are provided in Appendix 2.

2.3 Seckford Hall, barn and lodge form a cluster of three assets located to the northwest of the site. Given their proximity to the site, in conjunction with the higher tier listing, these assets have been scoped into this review.

2.4 To the southwest is No. 1 Top Street. Development on the site does not have potential to affect its special interest. There is no intervisibility between the site and the asset, and they share no known functional, associative or historic relationship. This asset has therefore been excluded from the scope of this assessment.

2.5 Sluice Farmhouse to the south has been excluded for the same reasons.

Brief History of the Site and Surrounding Area

2.6 The 1890 Ordnance Survey (OS) Map (Appendix 1) depicts the site as enclosed fields. Seckford Hall and surrounding buildings are shown to the north-west. The site does not appear as a part of the designed landscape of Seckford Hall but rather forms part of the wider agricultural landscape.

2.7 The 1905 OS Map depicts the site as a (plant) nursery. The field boundaries appear unchanged. This change in use is further evidence that the site has not formed part of the designed landscape setting to Seckford Hall for at least over a century (if at all).

2.8 The 1938 OS Map depicts the nursery on the site in the same position. By this time, the intervening landscape between it and Seckford Hall had changed significantly with the construction of the dual carriageway cutting through the landscape to the west. This is present today as the A12. Notwithstanding that the site was not part of any designed landscape and in use a nursery, the A12 introduced a physical division between the site and the landscape setting to Seckford Hall to the west, reinforcing its separation from the historic complex.

2.9 The 1993 OS plan makes the first cartographic reference to a football club on the site and shows the impact of the late C20 southerly expansion of Woodbridge which forms the northern context of the site today.
Statement of Significance

Seckford Hall

Photo 1. Seckford Hall and barn as seen from the road

2.10 Seckford Hall is a Grade II* listed former country house dating from c.1553. As a Grade II* listed building, it should generally be considered to be of very high significance.

2.11 By virtue of its C16 origins, the fabric is of significant age and lends the site some archaeological interest.

2.12 The house is red English bond brick with a plain tile roof. It is two storeys with basement and attic. The entrance front is of seven bays near-symmetrically disposed. The house still retains many features characteristic of its period such as the crow step gables, cross windows, and tall chimney stacks. There are a number of C19 and C20 alterations and additions such as wings and window alterations. Nevertheless, as an example of a high status Elizabethan seat, the Hall is of considerable architectural interest.
2.13 The house has historic interest by virtue of its C16 origins but also association with Thomas Seckford who commissioned its construction. Seckford was a prominent figure both locally and nationally as one of Queen Elizabeth I’s two Masters in the Ordinary of the Court of Requests. He was also an MP for Ripon, Orford, Ipswich and Suffolk throughout his life. Today, the Hall is a hotel and is used for events.

2.14 In the setting of Seckford Hall and listed separately at Grade II is a barn and spur wall of C16 and C17 origins. The barn is of a similar style to the Hall with red English bond brick with plain tiled roof. The barn is of 6 bays.

2.15 There is also a Grade II listed former lodge in the grounds. The lodge is also contemporary to the Hall. It is four storeys, red brick and plain tiled roof with crow stepped gables and pinnacle bases.

2.16 As Grade II listed buildings, they are generally of high significance.

Setting

2.17 The immediate setting of Seckford Hall is well defined by its pleasure gardens delineated by the boundary wall, which create a formal landscape setting. The Hall is set back from the road allowing the front elevation to be viewed in full within this formal landscape setting and lending it a grandeur that is appropriate to its historic status. The barn is located to the front (north) of the Hall adjacent to the road and forms part of a cluster of historic agricultural buildings. The lodge, or gazebo, is located on the boundary wall appropriate to its historic use as a garden structure separate from the main house.

2.18 The formal garden setting together with the relationship that the individually listed historic structures share with each other makes the greatest positive contribution to the way in which they are experienced.

2.19 With regards to the wider setting, Seckford Hall sits within a dip in the landscape. There is a steep rise in the landform to the east of the Hall which effectively prevents views from the east in the direction of the site. The topography together with extensive tree cover, including non-deciduous species, prevent any views to the A12 and development beyond from Seckford Hall and its immediate surroundings, as well as blocking the traffic noise, such that the historic complex is largely unaffected by the modern expansion of Woodbridge to the northeast.
2.20 By virtue of the topography and tree cover, the site is largely hidden from view despite its elevated position. From very limited viewpoints the top section of a limited number of floodlights on the site could be glimpsed in breaks in the tree cover. Such views are so restricted and at sufficient distance not to materially affect an appreciation of the historic complex.

Photo 2. View from the road to the front of Seckford Hall towards site
Photo 3. Landscaped gardens, Seckford Hall

Photo 4. View from the west looking east over Seckford Hall in the direction of the site
2.21 To the west of the Hall is Seckford Golf Club with a car park and associated structures to the west and the golf course to the north and southwest of the Hall; these features are relatively unobtrusive although they do introduce activity and modern elements into the wider landscape setting of the hall.

2.22 In summary, the site visit and desk-top assessment confirmed that there is no material visual connectivity between the site and Seckford Hall.

2.23 It is acknowledged that, as set out in the guidance document ‘Good Practice in Planning Note 3: The Setting of Heritage Assets’ (2017), setting is not only visual and that other attributes such as historic ownerships and functional associations can be relevant considerations.

2.24 The historic map evidence is set out above and in Appendix 1. This demonstrates that, at least for the last century, the site has not formed part of any designed landscape setting to Seckford Hall. Whilst the historic ownership patterns are unknown, given that the site is physically and functionally separate from Seckford Hall and has been for a considerable period of time, any such associations that may have existed, are now only a matter of archival record and cannot be interpreted on the ground. As such, the site is not considered to make any positive contribution to the significance of Seckford Hall by virtue of any historic, associative or functional relationship.

2.25 In summary, the site has not been identified as making any contribution to the significance of Seckford Hall or how this significance is experienced.
3.0 ANALYSIS: PRINCIPLE OF DEVELOPMENT

3.1 The site in its current form is visually, physically and functionally separate from the cluster of listed buildings at Seckford Hall such that its development in principle would not have any adverse impact on their significance.

3.2 There is potential for any tall structures to be visible along the western edge of the site in easterly views from Seckford Hall. Given the limited visual interaction between the site and Seckford Hall as a result of extensive tree screening and topography, the potential for any impact is minimal.

3.3 Any such potential impacts can be mitigated through the careful control of scale, massing and layout together with appropriate landscaping treatment along the western site boundary secured within the wording of the draft policy and through the submission of a formal application to the Council.

3.4 The draft policy wording includes provisions to ensure that the scheme responds appropriately to its landscape context. It establishes a requirement for the developer to strengthen and retain the existing landscaping and trees on the perimeter of the site and for the design, layout and height of the buildings to be appropriate to the site’s location adjacent to the Area of Outstanding Natural Beauty.

3.5 The supporting policy text establishes an expectation that the built part of the development will be located in the northern part of the site and be of a height and layout that respects its position in the landscape. These same considerations will conserve the heritage significance of the cluster of heritage assets to the west.
4.0 CONCLUSIONS

4.1 The site in its current form is not considered to make any contribution - positive, neutral or negative - to the way in which the cluster of heritage assets at Seckford Hall are experienced. On this basis, it makes no contribution to their significance and, subject to detailed design, the site is capable of accommodating development with no adverse impact on the heritage assets. On this basis, the allocation of the site is in line with the objectives of paragraph 185 of the NPPF.

4.2 The limited sensitivity of the site and scope for adverse impact with reference to the heritage designations is such that it is not considered to warrant heritage-specific policy provision within the site allocation policy. Measures to protect the Area of Outstanding Natural Beauty together with the proposed historic environment local plan policies SCLP 11.3 and 11.4 in conjunction with Chapter 16 of the NPPF and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 offer sufficient planning control to conserve the heritage significance of these assets.
APPENDIX 1

Historic Maps
APPENDIX X 2

List Descriptions
SECKFORD HALL

Overview

Heritage Category:
Listed Building

Grade:
II*

List Entry Number:
1030755

Date first listed:
16-Mar-1966

Statutory Address:
SECKFORD HALL, SECKFORD HALL ROAD
Map

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Location

Statutory Address:
SECKFORD HALL, SECKFORD HALL ROAD

The building or site itself may lie within the boundary of more than one authority.
County:
Suffolk
GREAT BEALINGS SECKFORD HALL ROAD TM 24 NE (South Side) 5/75 Seckford Hall 16/3/66 G.V. II* Hotel, formerly country house. c.1553 for Thomas Seckford with C19 and C20 additions and alterations. Red English bond brick with a plain tile roof. Two storeys with basement and attic. Entrance front: of 7 bays near-symmetrically disposed. Porch bay at centre with polygonal buttresses to either side. These have a projecting plinth, common to the whole of the front, and rise to terminate in mace finials of moulded brick. Central plank door to the ground floor with the original iron door furniture. Set in a cavetto and ovolo-moulded brick surround. Moulded rectangular surround beyond this and pediment above of moulded bricks. String course at the level of the sill of the first floor windows which is of 3 lights with ovolo-moulded surround and mullions and a transom. Further string course above this with a pediment. Battlemented parapet above with saddle back coping. To right of the central bay are 2 bays which each have a 3-light basement window with chamfered surrounds, that at left having lost one mullion, with ovolo-moulded surrounds and hood moulds with label stops. To the ground floor are similar 4-light windows and to the first floor at left is a 3-light window with mullions and transom and to right two cross-windows divided by a king mullion with continuous hood mould. Two stepped gables above this with saddleback copings and a 2-light window to each gable. Between these bays is a lead rain water head showing the Seckford and Mackford coats of arms in relief with a C20 lead down pipe and to right is a similar rain water head and pipe. To left of the central bay are two bays, that at left being originally the staircase light of 2 storeys height and formed of four cross windows divided by a king mullion and king transom. To right of this at ground floor level is a 4-light window with ovolo-moulded surround and hood mould and above this is a 3-light window with ovolo-moulded mullions and transom. Crow-stepped gables above these bays with 2 two-light windows and saddleback coping as at right. The lateral bays project slightly and have octagonal buttresses to their corners which diminish via an offset between the ground and first floors. These bays have four-light ground floor windows with pediments, 3-light similar windows to the first floor and 2-light similar windows to the attic, all having ovolo-moulded surrounds. Crow-stepped gables above with flat tops and mace finials of moulded brick above the polygonal buttresses. To the ridge at right and left of centre are cross-axial chimney stacks which have square bases supporting octagonal chimney shafts with moulded caps and bases. To right and before ridge level is an C18 or C19 rectangular stack and to the roof of the right hand gable wing is a cross-axial stack with rectangular body supporting 4 octagonal flues with moulded bases but having lost their caps. Right hand side: imposed doorway at far left with flat arched head above which is a 3-light window to the first floor with chamfered surround. To right of this is a slightly projecting gabled bay with octagonal buttresses to the corners with mace finials of moulded brick as seen on the entrance front. This has at ground floor level a substantial projecting wing of C20 date the flat roof of which forms a balcony to the first floor windows which have a doorway at right and a cross window at left, both of C20 date but set in the older window surrounds. The gable which is crow-stepped with saddle back coping holds a 2-light C20 window set in older hollow-chamfered surround. To the re-entrant angle at right of this is a turret with one first floor casement. This has rendered walling to its lower body and a brick kneeler and crow-stepped gable with saddle-back coping. To right of this at ground floor level are 3 recessed bays. These have a 2-light window at left, fitted with C20 mahogany windows, set in an earlier surround with hood mould above. To right is a C20 cross window with flat head. A continuous hood mould joins this to the central window which is of 3 lights with C20 chamfered ashlar surround set within an earlier hollow chamfered surround and brick mullions and to left of this is a 3-light C20 window with lowered sill which appears however to be set within an earlier opening. To the attic are flat-roofed dormer windows, that at right of 4-lights and that at left of 3-lights. To right again is a further projecting turret with first floor window, kneeler and crow-stepped gable as has that to left. This has a polygonal buttress to the right hand corner with mace finial of rubbed brick. Extending at right is a C20 addition in a Tudor style with randomly distributed fenestration, above which is a further dormer window of 8 lights. The left hand face is almost entirely of C20 date and has C20 fenestration. Doorway
at right and to left a cross window and to the first floor are two 2-light windows. Projecting at left of this is a bay with polygonal buttresses to the corners having two cross windows to the ground and first floors and a stepped gable above. The buttresses terminate in ball finials. To left again a slight recessed portion with, at right, a projecting ground floor bay with cross window and brick parapet above this with saddleback coping. To left of this is one 4-light window. To the first floor at right a door and cross window and at left one 3-light window. Rear: recessed central range with projecting wings at either side. The recessed centre is of 5 bays and has at its centre a doorway with round-headed arch and moulded brick surround with ashlarspringers. This has ashlarpilasters at either side with cabled flutings standing on panelled plinths which are weathered. The entablature above has metopes with shields and triglyphs with guttae. The first floor window is of 3 lights with moulded mullions and transom and ovolo moulded surround. To either side of this are fluted pilasters with moulded bases and resting on moulded plinths with diamond panels but without capitals, (the brickwork above this level having been disturbed). Below the first floor window is a rectangular ashspar panel showing a coat of arms with foliage and tassels. The walling at right of centre appears to have been largely rebuilt, having larger bricks of a different colour and perhaps of C19 or C20 date. To left at ground floor level is a hall window formed of 4 windows of 3x4 lights, the lower two lights divided from the upper 2 by a king transom and all having an ovolo moulded surround. At right of this is a stretch of walling bearing a C20 lead downpipe with a C16 rainwater-head with coat of arms and at right of that a further hall window, similar to the staircase window on the entrance front, that is four cross windows divided by a king mullion and king transom. To left of the central doorway is one 4-light ground floor window with ovolo-moulded surround and to the first floor above this are 2 cross windows set in a recessed portion of walling all with ovolo-moulded surrounds and with a cambered relieving arch above. To far left is a C20 glazed door with overlight and a 2-light first-floor window. The projecting wing at right has, to its inner flank, a 3-light window with ovolo moulded surround above which is a pediment of moulded brick. Dividing the ground from the first floor is a string course of moulded brick and on this rests the first floor window which is of 3 lights with an ovolo moulded surround. To right of this is a C20 portion in Tudor style which has a doorway set in a recessed portion of walling with a panelled door and projecting gabled wing at right of this with 3-light ground floor window with pediment, and a 2-light window to the first floor, the 2 floors divided by a string course. The left hand wing has a 3-bay symmetrical arrangement to its inner-facing flank at right with a doorway at centre which has a round arch, ashlarpilasters and fluted and coupled pilaster at either side resting on panelled plinths. Pediment above this with brick springers to which have been applied triglyphs, guttae and shields. Pediment above this of moulded brick with ball finials at either side and to the apex. To either side of this are 3-light windows with ovolo-moulded surrounds and mullions and a transom with pediments above. To the first floor, which is divided from the ground floor by a string course, are three windows of 3-lights with ovolo-moulded surrounds. These three bays now carry 2 hipped roofs but a drawing by Davy in the British Museum Print Room shows each bay with a stepped gable. To left of these bays is a portion of C20 walling which has a 3-light ground floor window with ovolo-moulded surround and pediment above divided from the first floor by a string course and a 3-light similar window to the first floor.

Interior: the building has been greatly restored this century, but the plan and features of the interior have been greatly altered in the process. Close studded walling survives in one first floor bedroom with tension braces and chamfered ceiling beams and further close studding in the walls of the present bar area. A staircase of two flights with a quarter turn, turned balusters, heavy moulded handrail and square newels with ball finials and apparently of early C18 date has been removed from its former position. The hall has been divided by an inserted floor and the early Renaissance screen which had Roman Doric columns with cabling has been removed and replaced by a Perpendicular ecclesiastical screen of early C16 date. Considerable quantities of plastered materials have been used (the present guidebook records that "Fifteen six-ton lorry loads of panelling, ceilings, doors and carved beams went to the re-fitting of the Hall") and considerable alterations have occurred since this re-fitting of after 1945. Of the planted timbers the ceiling beams and joists in the hall are from Beau Desert Manor, Staffordshire and the church screen, linenfold panelling and panelled door with Renaissance profile medallions are all of high quality. A portion of this building lies in Martlesham C.P.


Listing NGR: TM2525348366
Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: 285439

Legacy System: LBS

Sources

Books and journals
Bunn, M, A Short History of Seckford Hall and the Seckford Family
Avray Tipping, H, 'English Homes' in Period 3, (1922)

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

Images of England

Images of England was a photographic record of every listed building in England, created as a snap shot of listed buildings at the turn of the millennium. These photographs of the exterior of listed buildings were taken by volunteers between 1999 and 2008. The project was supported by the Heritage Lottery Fund.

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1, TOP STREET

Overview

Heritage Category: Listed Building

Grade: II

List Entry Number: 1198682

Date first listed: 12-Jul-1983

Statutory Address: 1, TOP STREET
Map

Location

Statutory Address:  
1, TOP STREET

The building or site itself may lie within the boundary of more than one authority.  
County:  
Suffolk
District: Suffolk Coastal (District Authority)

Parish: Martlesham

National Grid Reference: TM 25359 47745

Details

TM 24 NE MARTLESHAM TOP STREET

2/18 No. 1

II

House, late C18. Red brick with pantiled roof. Crow stepped dutch gables with red brick square stacks set diagonally. 4 windows with segmental brick arches; 2 and 3 light casements. The left window on ground floor has been blocked up. Entrance doorway with segmental arch and boarded door.

Listing NGR: TM2535947745

Legacy

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SLUICE FARMHOUSE

Overview

Heritage Category:
Listed Building

Grade:
II

List Entry Number:
1283753

Date first listed:
12-Jul-1983

Statutory Address:
SLUICE FARMHOUSE, SANDY LANE
BARN AT SECKFORD HALL AND SPUR WALL

Overview

Heritage Category: Listed Building

Grade: II

List Entry Number: 1377181

Date first listed: 16-Mar-1966

Statutory Address: BARN AT SECKFORD HALL AND SPUR WALL, SECKFORD HALL ROAD
SECKFORD HALL LODGE

Overview

Heritage Category:
Listed Building

Grade:
II

List Entry Number:
1377127

Date first listed:
16-Mar-1966

Statutory Address:
SECKFORD HALL LODGE, BEALINGS ROAD
Map

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Location

Statutory Address:
SECKFORD HALL LODGE, BEALINGS ROAD

The building or site itself may lie within the boundary of more than one authority.
County:
Suffolk
Details

TM 24 NE MARTLESHAM BEALINGS ROAD

2/8 Seckford Hall Lodge 16.3.66

GV II

Former lodge or Gazebo, now residential accommodation for staff of Seckford Hall. Mid C16. Square plan. 4 storeys. Red brick and plain tiled roof with crow stepped gables and pinnacle bases. Original windows to north and south elevations; some blocked others with leaded casements and moulded brick label moulds. Entrance door to south side with semi circular arch and panelled door. Door at high level to timber fire escape.

Listing NGR: TM2535048406

Legacy

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285035

Legacy System:
LBS

Legal

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Location

Statutory Address:
BARN AT SECKFORD HALL AND SPUR WALL, SECKFORD HALL ROAD

The building or site itself may lie within the boundary of more than one authority.
County:
Suffolk
District: Suffolk Coastal (District Authority)
Parish: Great Bealings
National Grid Reference: TM 25272 48422

Details

GREAT BEALINGS SECKFORD HALL ROAD TM 24 NE (South Side) 5/76 Barn at Seckford Hall 16/3/66 and Spur Wall G.V. II
Barn and spur wall. C16 or C17. Red English bond brick with plain tiled roof. Open plan barn of 6 bays. Yard front:
projecting deep plinth to lower wall. Outshut of C19 date at right with lean-to roof and gabled projecting cattleshed
extending at far left. Between these at right are the cambered headed doorways of C19 date, now blocked and having
horizontal C20 windows inserted. Cross window between these, all set in what appears to be renewed walling. To left of
this is earlier walling and above the plinth are a row of rectangular breathers, now blocked. To left again is a double-door-
opening extending the full height of the walling and with a wooden lintel immediately below the wall plate. The right
hand gable end has a double-door with cambered head of Cl9 date at left. Above this is a blocked 4-light mullioned
casement and to the gable are three bands of chevron decoration in fired headers. To the road front gable end is a
projecting plinth, walling with a lattice pattern of fired headers containing diamonds. Blocked opening at ground floor
centre. C20 metal window at ground floor level. Two-light window with chamfered surround to the gable. The forecourt
front is masked by Cl9 lean-to outshuts but inside these the walling has a projecting plinth and blocked rectangular
breathers.

Interior: 6 bays with 6 subsidiary bays. The major trusses having tie beams, collar beams and wind bracing, the subsidiary
trusses having no tie beams and no wind bracing, save to the far northern end. Extending from the north eastern corner
of the barn is a spur wall that terminates in a square gate pier with stepped cap and globe-light finial. The walling has, to
its road side a lattice pattern of fired headers and a cogged band below the parapet which is of saddle-back shape. This
walling continues at the other side of the gateway as the walls of enclosed garden in Martlesham C.P. and forms part of
the northern wall of the western garden.

Listing NGR: TM2527248422

Legacy

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Legal

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## Location

**Statutory Address:**
SLUICE FARMHOUSE, SANDY LANE

The building or site itself may lie within the boundary of more than one authority.

**County:**
Suffolk
District: Suffolk Coastal (District Authority)
Parish: Martlesham
National Grid Reference: TM2574447574

Details

TM 24 NE MARTLESHAM SANDY LANE

Sluice Farmhouse 2/16 II


Listing NGR: TM2574447574

Legacy

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Legacy System number: 285043
Legacy System: LBS

Legal

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End of official listing

Images of England
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Date: 09 Aug 2001

Reference: IOE01/04936/33

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