

Planning Application DC/26/1490/OUT Saxmundham

hybrid planning application to include: (a) full permission for the primary drainage infrastructure and associated construction access; and (b) outline planning permission (all matters reserved except access) for residential development, employment

Alison Andrews

From : aldeblackburn@aol.com

To: planning@eastssuffolk.gov.uk

30 July 2026

Objection from the Alde Ore Association

The Alde and Ore Association has some 2000 members. (Registered Charity No. 1154583). Its charitable objectives are to preserve for the public benefit the Alde, Ore and Butley Creek rivers and their banks from Shingle Street to their tidal limits and such of the land adjoining them or upstream as may be considered to affect them, together with the features of beauty and or historic or public interest in that area.

The Association **objects** to this application on the grounds that Anglian Water state that the current public foul drainage network does not have the capacity to take the estimated additional flows that would be generated by the proposed development. The Benhall Sewage Treatment works lies on the Fromus, a tributary of the Alde and Ore rivers. If foul water overflows from there it will pass down the Fromus river and could adversely affect SZC's Wild Benhall project, the Snape Wetlands reserve which has been established by the RSPB, and the Alde and Ore estuary past Snape Maltings.

As Natural England point out the proposal lies close to a number of highly environmentally protected areas. In particular, in relation to the Alde and Ore rivers and estuary are the Alde-Ore Estuary Special Protection Area (SPA) • Alde-Ore Estuary Ramsar Site • Alde-Ore Estuary Special Area of Conservation (SAC) • Orfordness-Shingle Street SAC. The estuary is a much-valued area for its breeding and migrating birds which rely on the clean water that ensures a food rich shoreline. Any serious pollution would undermine the quality of the area and be contrary to the serious environmental protection requirements.

In addition to the statutory designated protection sites, the recently constructed wetland Wild Benhall site currently under management of SZC to create compensatory habitat, is geographically the first downstream site to be impacted. Extensive work has been carried out there to create a nutrient poor environment for fen meadow regeneration and the proposed development would compromise the Wild Benhall site unless there were enhanced treatment techniques.

Further, the estuary is known to be a clean water estuary, with waters generally of 'Excellent bathing water quality' (Environment Agency definition). The Association has been monitoring the quality of the water at the Benhall Treatment works, along with 12 other sites on the Alde and Ore, for over 4 years. The water coming from Benhall in the Fromus river enters the estuary at its tidal limit at Snape. The estuary water is almost all of the time of reasonable quality. This is important not only for the wild life and vegetation but also because of the many water-based activities in the estuary. Heavy inflows, even occasional, of E.coli arising because the Benhall works were overloaded and could not properly process the foul water, would undermine the leisure and fishing based economic activities.

There is a further reason for objection, in addition to that by AWS on the grounds of insufficient treatment capacity, which is that the Environmental Report accompanying the application is silent on the impact of the development on the aquatic environment and the downstream consequences of massive changes in foul water flows from such a substantial multipurpose development site and is unaware of the current concerns without such a discharge: -.

i. The Association notes from its own observations that Anglian Water are currently working on improving the current works on the current level of waste water flow because, even with modern abatement technology, the target discharge level of 0.1mg/l Phosphorous (as P) set by the Environment Agency is not achieved by the existing infrastructure in the River Fromus (0.2 mg/l P).

ii. Phosphate pollution is a contributing factor in the degradation of aquatic ecosystem diversity. It is therefore clear that the capacity to take on more is not there at present and the proposed development could lead it to breaching the environmental legislation provisions.

iii. Nitrates are a product of the sewage treatment process and the development threatens to significantly increase the volume of nitrate-rich effluent in what is already a Nitrate Sensitive Zone. Nitrate concentration in river water on Benhall Marsh is commonly 200mg/l -- four times the limit required for drinking water. Nitrate pollution is a threat to drinking water supplies and is another contributing factor to loss of biodiversity in aquatic ecosystems.

iv. While, the above are the only parameters we measure, we know there will be a concomitant rise in such things as microplastics, pharmaceutical residues, and other PBTs (Persistent, Bioaccumulative and Toxic Substances) which are anthropogenic in origin.

In summary, we would need much greater reassurance that urban waste water treatment is fit for purpose before such large-scale developments are considered.

In the event that the planning authority decides to defer any decision whilst seeking clarifications and further evidence, then we would expect the authority to increase the scope of its consultation to include those people, areas and activities that are downstream of the waste water treatment plant and who may be affected by this proposal.

30 July 2026