

Saxmundham Neighbourhood Plan **Basic Conditions Statement**

To accompany the Saxmundham Neighbourhood Plan
submission version, for examination

April 2022

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1. Introduction

- 1.1 When submitting a Neighbourhood Plan to the Local Authority (in this case East Suffolk Council), it is a requirement that the Plan be accompanied by a number of supporting documents. One of these is commonly referred to as the 'Basic Conditions Statement'. Only a Neighbourhood Plan that meets each of the basic conditions can be put to referendum and if successful be used to assist in the determination of planning applications.
- 1.2 This Basic Conditions Statement is prepared for use by East Suffolk Council and the Independent Planning Examiner, to assist in making this assessment about the basic conditions.

2. Legal Requirements

Legal Requirements: The Neighbourhood Plan is compliant with The Planning and Compulsory Purchase Act 2004 38A (1) & (2) and 38B (a)-(c).

Qualifying Body: The Saxmundham Neighbourhood Development Plan being submitted by a qualifying body – Saxmundham Town Council. Saxmundham Town Council was confirmed as a qualifying body by East Suffolk Council on 29th August 2017 when the Saxmundham Neighbourhood Plan Area was designated.

A Neighbourhood Development Plan: The Saxmundham Neighbourhood Development Plan is a neighbourhood development plan. It relates to planning matters (the use and development of land) and has been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012.

The time-period covered: The Saxmundham Neighbourhood Plan states the time-period for which it is to have effect (from 2022-2036) a period of 14 years.

Excluded Development: The Saxmundham Neighbourhood Development Plan policies do not relate to excluded development. The Saxmundham Neighbourhood Development Plan does not deal with County Matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.

Area of the Neighbourhood Plan: The Saxmundham Neighbourhood Development Plan relates to the Saxmundham Town Council's Neighbourhood Area and to no other area. There are no other Neighbourhood Plans in place relating to that Neighbourhood Area.

3. Basic Conditions

- 3.1 Paragraph 8(2) of Schedule 4B in the Town and Country Planning Act 1990 (as amended by Schedule 10 of the Localism Act 2011) sets out a series of requirements that Neighbourhood Plans must meet. These ‘basic conditions’ are set out below.
- 3.2 A draft Plan meets the basic conditions if –
- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan (see below).
 - (b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order (applies in relation to a Listed Building only insofar as the order grants planning permission for development that affects the building or its setting (not applicable in respect of the Saxmundham Neighbourhood Plan)).
 - (c) Having special regard to the desirability of preserving or enhancing the character or appearance of the Conservation Area it is appropriate to make the order (applies in relation to Conservation Areas only) insofar as the order grants planning permission for development in relation to buildings or land in the area (not applicable in respect of the Saxmundham Neighbourhood Development Plan).
 - (d) The making of the Plan contributes to the achievement of sustainable development (see below).
 - (e) The making of the Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). (see below).
 - (f) The making of the Plan does not breach and is otherwise compatible with EU obligations (see below) and,
 - (g) Prescribed conditions are met in relation to the plan and prescribed matters have been complied with, in connection with the proposal for the plan (see below).
- 3.3 Where applicable each of these basic conditions is addressed below. For clarification it should be noted that b) and c) above are not applicable to the Saxmundham Neighbourhood Development Plan and refer to ‘Neighbourhood Orders’ only.

4. a) Having regard to National Policies and Advice and e) Conformity with Strategic policies in the Development Plan

- 4.1 The following table provides an appraisal of the extent to which the Saxmundham Neighbourhood Plan has regard to national policy and is in general conformity with strategic local policy.
- 4.2 The Neighbourhood Plan policies were drafted to be in conformity with the National Planning Policy Framework published in July 2021. The table below assess the degree of regard that the Saxmundham Neighbourhood Development Plan policies have had to NPPF 2021 (Column B).

- 4.3 The strategic policies for the area are contained in the East Suffolk Council – Suffolk Coastal Local Plan (SCLP) which was adopted in September 2020. The Neighbourhood Plan has been assessed against the relevant policies in the Local Plan at Column C.
- 4.4 In summary, the appraisal demonstrates that the Saxmundham Neighbourhood Development Plan has had appropriate regard to and is in general conformity with, both national and strategic policy.
- 4.5 It should be noted that the policies within the Neighbourhood Plan relating to the South Saxmundham Garden Neighbourhood relate to the Neighbourhood Area only. Furthermore the 'Opportunity Zone' that are identified in the plan are not intended to be site allocations (and therefore do not contain specific development details or proposals) but instead are areas identified where the potential for future development could be explored further.

Assessment of policies in the Saxmundham Neighbourhood Plan against National and Local strategic policies

Column A Saxmundham Neighbourhood Development Plan Policy	Column B NPPF 2021	Column C East Suffolk Council – Suffolk Coastal Local Plan – Adopted 2020
SAX1: General design principles	<p>This policy reflects NPPF para 130 which sets out the design criteria that development should meet for example ‘visually attractive as a result of good architecture, layout and appropriate and effective landscaping’, ‘sympathetic to local character and history, including the surrounding built environment and landscape setting while not preventing or discouraging appropriate innovation or change’...‘create places that are safe, inclusive...with a high standard of amenity...and where crime and the fear of crime do not undermine the quality of life or community cohesion or resilience’.</p> <p>The policy requires that all new development reflects the town’s local distinctiveness and character and seeks to enhance its quality. It sets out the key criteria for achieving this. The policy is supported by the Saxmundham Design Guidelines and Codes for the Garden Neighbourhood and the Neighbourhood Plan Area document.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP11.1 Design Quality which supports locally distinctive and high-quality design that clearly demonstrates an understanding of the key features of local character and seeks to enhance these features through innovative and creative means.</p> <p>Policy SAX1 requires that all new development reflects the town’s local distinctiveness and character and seeks to enhance its quality. It sets out the key criteria for achieving this. The policy makes specific reference to support for proposals that incorporate eco-friendly, innovative, or contemporary designs.</p> <p>The policy is supported by the Saxmundham Design Guidelines and Codes for the Garden Neighbourhood and the Neighbourhood Plan Area document.</p>
SAX2: Expansion of existing business	<p>This policy reflects NPPF para 81, which indicates that significant weight should be given to the need to support economic growth.</p> <p>Policy SAX2 reinforces a commitment to employment and business within the town and encourages the small-scale expansion of existing businesses subject to criteria.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP4.1 Existing Employment Areas which supports new development for employment uses at existing Employment Areas .</p> <p>Policy SAX2 reinforces a commitment to employment within the town and encourages the small-scale expansion of existing businesses subject to criteria.</p>

<p>SAX3: New businesses</p>	<p>This policy reflects NPPF para 81, which indicates that account should be taken of local business needs and wider opportunities for development. The NPPF also indicates that an area should be allowed to build on its strengths and counter any weaknesses and address the challenges of the future.</p> <p>Policy SAX3 identifies a variety of employment sectors that will be supported.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP4.2 New Employment Development which supports new employment opportunities which provide greater choice of economic opportunities and Policy SCLP12.28 – Strategy for Saxmundham, criterion c) which seeks to diversify and expand employment opportunities.</p> <p>Policy SAX3 indicates support for a variety of employment sectors considered to be important to the town.</p>
<p>SAX4: Protecting valued local community facilities and amenities</p>	<p>This policy is consistent with criterion c of paragraph 93 which urges planning policies to “guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”.</p> <p>Policy SAX4 seeks to resist the loss of community facilities unless suitable alternative provision exists or can be provided elsewhere.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP8.1 Community Assets and Facilities which seeks to resist the loss of valued community facilities and assets subject to criteria governing viability and replacement facilities.</p> <p>Policy SAX4 seeks to resist the loss of community facilities unless suitable alternative provision exists or can be provided elsewhere.</p>
<p>SAX5: New community facilities</p>	<p>This policy is consistent with paragraph 8b of the NPPF which outlines the social objective of the NPPF and specifically highlights the need for ‘accessible services and open spaces that reflect current and future needs and supports communities’ health, social and cultural well-being’.</p> <p>This policy is consistent with NPPF para 93 which states ‘To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;’</p>	<p>There is no specific corresponding policy that supports new community facilities in general terms within the Adopted Local Plan. Policy SCLP12.29 which refers to the South Saxmundham Garden Neighbourhood makes reference to the community facilities that have been identified as being required as a consequence of that development .</p>

	<p>Policy SAX5 supports proposals for new community facilities, subject to criteria and sets out the priorities for new provision based on community consultation.</p>	
<p>SAX6: Improving connectivity</p>	<p>This policy is consistent with paragraph 92 (c) of the NPPF which supports healthy lifestyles through encouraging walking and cycling and paragraph 104 (c) which promotes walking and cycling as a preferred transport option.</p> <p>Policy SAX6 specifically refers to the need for new developments to contribute to the health and wellbeing of residents by increasing levels of walking and cycling and to the provision of safe and attractive pedestrian and cycle routes and crossings.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP7.1 Sustainable Transport which requires new development to be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services, and facilities and provides safe pedestrian and cycle access to services and facilities.</p> <p>Policy SAX6 specifically refers to the need for new developments to contribute to the health and wellbeing of residents by increasing levels of walking and cycling and to the provision of safe and attractive pedestrian and cycle routes and crossings.</p>
<p>SAX7: Public Rights of Way</p>	<p>This policy is consistent with paragraph 100 of the NPPF which encourages planning policies to protect and enhance public rights of way and take opportunities to provide better facilities for users.</p> <p>Policy SAX7 seeks to protect and enhance existing public rights of way and where these may be lost requires appropriate new routes and diversions which are safe and convenient for users.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP7.1 criterion f) which seeks to ensure that development is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network.</p> <p>Policy SAX7 seeks to protect and enhance existing public rights of way</p>
<p>SAX8: Parking provision</p>	<p>This policy is consistent with paragraph 107 of the NPPF which indicates that parking standards should take account of the accessibility of the development, the type and mix, the availability of public transport and local car ownership levels.</p> <p>Policy SAX8 refers to residential and non-residential parking and encourages the use and installation of electric charging points. The policy refers to the adopted parking standards of East Suffolk Council.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP7.2 Parking Proposals and Standards which seeks to ensure that vehicle parking provision is protected and managed and indicates that the level of parking provision required will depend on the location, type, and intensity of use.</p> <p>Policy SAX8 refers to residential and non-residential parking and encourages the use of installation of electric charging points. The policy refers to the adopted parking standards of East Suffolk Council.</p>

<p>SAX9: Windfall and Infill development</p>	<p>This policy is consistent with NPPF paragraph 29 which indicates that Neighbourhood Plans should not promote less development than that set out in the strategic policies for the area.</p> <p>The Neighbourhood Plan does not make any specific allocations but instead includes criteria that new housing development needs to meet. The policy allows for windfall development within the settlement boundary subject to criteria, which would allow for development be over and above the existing commitment provided for in the adopted Local Plan</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP5.7 Infill and Garden development that sets out the criteria for infill development including garden land.</p> <p>Policy SAX9 includes more localised criteria for governing windfall or infill development such as size, scale, location, residential amenity, logical boundaries and requiring a functional relationship with adjacent development. Backland or tandem development will only be supported subject to criteria and where it would not have an adverse effect on the character of the area.</p>
<p>SAX10: Housing mix</p>	<p>This policy reflects NPPF para 62 which advises that planning policies should reflect the needs of ‘those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes’.</p> <p>The policy makes provision for smaller properties suitable for first time buyers, housing suitable for older people such as bungalows, affordable housing, and specialist accommodation for vulnerable people or those with special needs.</p> <p>The policy is based on the findings of the consultations carried out with local residents during the evolution of the Neighbourhood Plan.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP5.8 Housing Mix which set out the preferred housing mix for the district as a whole and SCLP12.28 criterion f) which seeks to increase the provision of housing including affordable housing to ensure a greater choice in the mix of housing available. This includes a focus on smaller properties (1-2 bedrooms) , accessible housing and housing for older people.</p> <p>Policy SAX10 makes provision for smaller properties suitable for first time buyers, housing suitable for older people such as bungalows, affordable housing, and specialist accommodation for vulnerable people or those with special needs.</p> <p>The policy is based on the findings of the consultations carried out with local residents during the evolution of the Neighbourhood Plan.</p>
<p>SAX11: Historic town centre and Conservation Area</p>	<p>This policy is in accordance with NPPF paragraphs 189 -202, which collectively seek to conserve and enhance designated heritage assets such as Listed buildings and Conservation Areas.</p> <p>Policy SAX11 seeks to control development that would affect designated heritage assets (the Conservation Area and Listed Buildings) or their setting and promotes the use of high-quality</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP11.3 Historic Environment, SCLP11.4 Listed Buildings and SCLP11.5 Conservation Areas which seeks to ensure where possible that development makes a positive contribution to the historic environment.</p>

	materials and attractive public realm, through the provision of specific advice on shopfronts and signage.	Policy SAX11 provides a more localised dimension and relates this general principle to the Listed Buildings and Conservation Area of Saxmundham where it provides some specific guidance for applications affecting heritage assets including public realm, materials, shopfronts, and signage.
SAX12: Non designated heritage assets	<p>This policy reflects NPPF paragraph 203 which outlines the approach to assessing the impact of applications on non-designated heritage assets. 'In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'</p> <p>The policy identifies 15 Non-Designated Heritage Assets within the Town that are important to the local character of the area. Each proposed NDHA has been assessed using the Historic England listing criteria and guidance.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP11.6 Non-Designated Heritage Assets which sets out the criteria for dealing with applications that affect Non-Designated Heritage Assets.</p> <p>Policy SAX12 provides a local dimension and identifies 15 potential NDHA which have been assessed using the Historic England guidance.</p>
SAX13: Gateways, views, and the landscape setting of Saxmundham	<p>This policy reflects NPPF para 130 b) and c) which require planning policies to ensure that developments are 'visually attractive as a result of 'appropriate and effective landscaping'...and are sympathetic to ...the surrounding built environment and landscape setting'. In addition paragraph 174 a) of the framework which advocates 'protecting and enhancing valued landscapes (and NPPF paragraph 174 b) which recognises the need to contribute to and enhance the intrinsic character and beauty of the countryside'.</p> <p>Policy SAX13 seeks to ensure that visual and scenic value of the landscape outside of the settlement boundary is protected from development that may adversely affect its character. The policy also identifies 4 specific town gateways which should be maintained as 'green' entrances to the town and 7 important local views which should be conserved and enhanced</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP10.4 Landscape Character which seeks to ensure that development proposals are informed by landscape character assessments and SCLP10.5 Settlement Coalescence which seeks to resist the coalescence of settlements.</p> <p>Policy SAX13 adds a local dimension and seeks to ensure that visual and scenic value of the landscape outside of the settlement boundary is protected from development that may adversely affect its character. Furthermore the loss of individual settlement distinctiveness and identity through coalescence of settlements is not supported.</p> <p>The policy also identifies 4 specific town gateways which should be maintained as 'green' entrances to the town and 7 important local views which should be conserved and enhanced</p>

<p>SAX14: Protection and enhancement of natural assets</p>	<p>This policy is consistent with paragraph 174 (d) of the NPPF which requires planning policies to minimise impacts on and provide net gains for biodiversity. In addition paragraph 179 (b) of the NPPF refers to the pursuit of opportunities for biodiversity net gains.</p> <p>Policy SAX14 seeks to protect and enhance existing ecological networks and wildlife corridors and supports proposals that provide a net gain in biodiversity. In addition the policy encourages the incorporation of features and planting that will add value to wildlife .</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP10.1 Biodiversity and Geodiversity which supports development that maintains, restores, or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity. The policy is also in conformity with Policy SCLP12.28 criterion e) which seeks enhancements to networks of green infrastructure and h) which seeks to protect and enhance the natural environment.</p> <p>Policy SAX14 has been prepared in the context of the Environment Act 2021 and seeks to protect and enhance existing ecological networks and wildlife corridors and supports proposals that provide a net gain in biodiversity. In addition the policy encourages the incorporation of features and planting that will add value to wildlife.</p>
<p>SAX15: Community gardens and allotments</p>	<p>This policy is consistent with paragraph 8b of the NPPF which outlines the social objective of the NPPF and specifically highlights the need for “accessible services and open spaces that reflect current and future needs and supports communities’ health, social and cultural well-being”. It is also consistent with paragraph 98, which highlights the importance of open spaces (such as allotments and community gardens).</p> <p>Policy SAX15 requires that new development make provision for community gardens or allotments to allow the opportunity for residents to grow their own food.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP8.2 Open Space and SCLP8.3 Allotments which seek to safeguard existing spaces and encourages the provision of allotments.</p> <p>Policy SAX15 requires that new development make provision for community gardens or allotments to allow the opportunity for residents to grow their own food.</p>
<p>SAX16: Green Spaces</p>	<p>This policy reflects NPPF paras 101-103 which advocates ‘The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them’.</p> <p>Policy SAX16 identifies 10 proposed Local Green Spaces which have been assessed against the criteria in the NPPF. In addition</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP8.2 Open Space which seeks to safeguard existing open space and enables Neighbourhood Plans to identify Local Green Spaces.</p> <p>In addition Policy SCLP12.29 criterion d) refers to the need for the provision of SANG within the Garden Neighbourhood to mitigate impacts on European Protected Sites.</p>

	<p>the policy proposes an area of land to the south of the town (The Layers) as an area of Suitable Alternative Natural Greenspace (SANG) which is required to act as mitigation for the potential recreational and disturbance impacts of the Garden Neighbourhood on sensitive protected nature conservation sites.</p>	<p>Policy SAX16 identifies 10 proposed Local Green Spaces which have been assessed against the criteria in the NPPF. In addition the policy proposes an area of land to the south of the town (The Layers) as an area of Suitable Alternative Natural Greenspace (SANG) which is required to act as mitigation for the potential recreational and disturbance impacts of the Garden Neighbourhood on sensitive protected nature conservation sites.</p>
<p>SAXGN1: Connecting the garden neighbourhood</p>	<p>This policy is consistent with NPPF paragraph 73 which indicates that the supply of large numbers of new homes can often be best achieved through planning for larger scale development , such as...significant extensions to ...towns provided they are well designed and supported by the necessary infrastructure and facilities including a genuine choice of transport modes. Furthermore paragraph 73 c) refers to the need to set clear expectations for the quality of places to be created and how this can be maintained (such as following Garden City principles) and ensure that appropriate tools and design guides or codes are used.</p> <p>Policy SAXGN1 specifically addressed the issue of connectivity – both between the garden neighbourhood and the town and its community, the wider countryside but also within the garden neighbourhood itself. The policy identifies three new specific pedestrian and cycle connections between the site and the town, bus stop provision, circular routes, and new rights of way together with new crossing points.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP12.29 South Saxmundham Garden Neighbourhood which allocates the Garden Neighbourhood and sets out how it should be developed. The policy includes broad criteria relating to community facilities, SANG, green infrastructure, open space, rights of way, biodiversity networks, dementia friendly design, heritage, flooding, and access.</p> <p>Policy SAXGN1 adds a further local dimension to the policy framework and is chiefly concerned with connections both within the Garden Neighbourhood and between it and the town and also the wider countryside. It identifies specific pedestrian and cycle routes that should be provided.</p> <p>The policy acknowledges the collaborative masterplan referred to in the Local Plan to be produced with landowner collaboration and community engagement. It is made clear in the policy that it only relates to the parts of the Garden Neighbourhood that fall within the Neighbourhood Area</p>
<p>SAXGN2: Green infrastructure</p>	<p>This policy is consistent with NPPF paragraph 73 c) which refers to the need to set clear expectations for the quality of places to be created and how this can be maintained (such as following Garden City principles) and ensure that appropriate tools and design guides or codes are used. Furthermore NPPF paragraph 130 b) requires that developments be visually attractive as a result of good architecture, layout, and appropriate and effective</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP12.29 South Saxmundham Garden Neighbourhood which allocates the Garden Neighbourhood and sets out how it should be developed. The policy includes broad criteria relating to community facilities, SANG, green infrastructure, open space, rights of way, biodiversity networks, dementia friendly design, heritage, flooding, and access.</p>

	<p>landscaping. Paragraph 98 of the NPPF indicates that access to a network of high-quality open spaces is important for the health and well-being of communities.</p> <p>Policy SAXGN2 specifically addresses the issue of green infrastructure provision in the Garden Neighbourhood and specifically identifies a series of green links and spaces that should be incorporated into the layout of the Garden Neighbourhood.</p>	<p>Policy SAXGN2 adds a further local dimension to the policy framework and is chiefly concerned with green infrastructure and open spaces and environmental issues. It identifies some specific areas where ‘green links’ should be provided e.g. the creation of a ‘green zone’ in the north of the site and significant landscaping along the western boundary.</p> <p>The policy makes reference to the collaborative masterplan referred to in the Local Plan to be produced with landowner collaboration and community engagement.</p> <p>It is made clear in the policy that it only relates to the parts of the Garden Neighbourhood that fall within the Neighbourhood Area.</p>
SAXGN3: Community Facilities	<p>This policy is consistent with paragraph 8b of the NPPF which outlines the social objective of the NPPF and specifically highlights the need for ‘accessible services and open spaces that reflect current and future needs and supports communities’ health, social and cultural well-being’.</p> <p>This policy is consistent with NPPF para 93 which states ‘To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: a) plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;’</p> <p>Policy SAXGN3 provides specific guidance on community facilities to be provided within the Garden Neighbourhood including design and locational criteria.</p>	<p>This policy is in general conformity with Adopted Local Plan Policy SCLP12.29 South Saxmundham Garden Neighbourhood which allocates the Garden Neighbourhood and sets out how it should be developed. The policy includes broad criteria relating to community facilities, SANG, green infrastructure, open space, rights of way, biodiversity networks, dementia friendly design, heritage, flooding, and access.</p> <p>Policy SAXGN3 provides a further local dimension to the policy framework and is primarily concerned with community facilities (which have been identified in the Local Plan policy) . The policy provides more detail on where such facilities may be best located within the Garden Neighbourhood.</p> <p>It is made clear in the policy that it only relates to the parts of the Garden Neighbourhood that fall within the Neighbourhood Area</p>
SAXTC1: Town Centre	<p>This policy is consistent with paragraph 86 of the NPPF which advocates a positive approach to the growth , management and</p>	<p>This policy is in general conformity with Adopted Policy SCLP12.28 which seeks to enhance Saxmundham’ s role as a market town and</p>

<p>overarching strategy</p>	<p>adaptation of town centres including promoting their long-term vitality and viability.</p> <p>Policy SAXTC1 sets out the long-term overarching strategy for the town centre reinforcing the area’s distinctiveness and attractive character, underpinning its vitality and viability, and ensuring that users have a high sense of safety and belonging.</p>	<p>employment and service centre. Criterion a) of the policy seeks to enhance the vitality and vibrancy of the town centre through protecting and enhancing the historic core of the town.</p> <p>Policy SAXTC1 builds on this and sets out the long-term overarching strategy for the town centre, identifying specific areas and buildings and reinforcing the area’s distinctiveness and attractive character, underpinning its vitality and viability, and ensuring that users have a high sense of safety and belonging.</p>
<p>SAXSA1: Station Area Opportunity Zone</p>	<p>This policy is consistent with NPPF paragraph 86 a) which encourages the growth and diversification of town centres in a way that responds to changes in retail and leisure and plans positively for a suitable mix of uses.</p> <p>Policy SAXSA1 identifies an ‘Opportunity Zone’ around Station Approach that would be suitable for redevelopment for mixed uses, modal shift, environmental and public realm improvements and enhanced pedestrian and cycle connectivity. This is not a site allocation but an area identified where the potential for future development could be explored further.</p>	<p>This policy is in general conformity with Adopted Policy SCLP12.28 – Strategy for Saxmundham, which recognises the opportunities offered by the rail connection. In addition criterion d) of the policy seeks to enhance pedestrian and cycle activity around the town centre and the railway station.</p> <p>Policy SAXSA1 adds further detail to this policy and identifies an ‘Opportunity Zone’ around Station Approach that would be suitable for redevelopment for mixed uses, modal shift, environmental and public realm improvements and enhanced pedestrian and cycle connectivity.</p>
<p>SAXSFR1: Street Farm Road Opportunity Zone</p>	<p>This policy is consistent with NPPF paragraph 86 a) which encourages the growth and diversification of town centres in a way that responds to changes in retail and leisure and plans positively for a suitable mix of uses.</p> <p>Policy SAXSFR1 identifies two broad ‘Opportunity Zones’ at Street Farm Road that would be suitable for mixed use development, environmental enhancement and community uses. This is not a site allocation but an area identified where the potential for future development could be explored further.</p>	<p>This policy is in general conformity with Adopted Policy SCLP12.28 which seeks to enhance Saxmundham’s role as a market town and employment and service centre. Criterion c) of the policy seeks to diversify and expand employment opportunities and criterion e) seeks to promote enhancements to networks of green infrastructure.</p> <p>Policy SAXSFR1 provides further detail and identifies two broad ‘Opportunity Zones’ at Street Farm Road. The first would be suitable for mixed use development including car parking and the second for environmental enhancement and community uses.</p>

<p>SAXFS1: Fromus Square Opportunity Zone</p>	<p>This policy is consistent with NPPF paragraph 86 a) which encourages the growth and diversification of town centres in a way that responds to changes in retail and leisure and plans positively for a suitable mix of uses. Furthermore, paragraph 86 c) of the NPPF advocates the retention and enhancement of markets and the reintroduction or creation of new ones.</p> <p>Policy SAXFS1 identifies an ‘Opportunity Zone’ at Fromus Square where proposals which would enhance the retail, hospitality, and leisure use of the area, whilst preserving its character and facilitate its use for market purposes and enhance its overall visual quality will be supported. This is not a site allocation but an area identified where the potential for future development could be explored further.</p>	<p>This policy is in general conformity with Adopted Policy SCLP12.28 which seeks to enhance Saxmundham’s role as a market town and employment and service centre. Criterion a) of the policy seeks to enhance the vitality and vibrancy of the town centre through protecting and enhancing the historic core of the town.</p> <p>Policy SAXFS1 adds more detail and identifies an ‘Opportunity Zone’ at Fromus Square where proposals which would enhance the retail, hospitality, and leisure use of the area, whilst preserving its character and facilitate its use for market purposes and enhance its overall visual quality will be supported.</p>
<p>SAXFC1: Former Fromus Centre and community garden Opportunity Zone</p>	<p>This policy reflects NPPF para 62 which advises that planning policies should reflect the needs of those who require specialist forms of housing to meet specific needs.</p> <p>Policy SAXFC1 identifies an ‘Opportunity Zone’ at the former Fromus Centre within which the provision of housing for those with specific needs would be supported together with the retention of the community garden as an open space. This is not a site allocation but an area identified where the potential for future development could be explored further.</p>	<p>This policy is in general conformity with Adopted Policy SCLP12.28 which seeks to enhance Saxmundham’s role as a market town and employment and service centre. Criterion f) of the policy seeks to increase the provision of housing and affordable housing to provide greater choice in the mix of housing available.</p> <p>Policy SAXFC1 provides more localised detail and identifies an ‘Opportunity Zone’ at the former Fromus Centre within which the provision of housing for those with specific needs would be supported together with the retention of the community garden as an open space.</p>

5. d) Achieving Sustainable Development

- 5.1 The NPPF 2021 states that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.¹ The appraisal of the Saxmundham Neighbourhood Development Plan policies against NPPF policies presented above demonstrates how policies in the Neighbourhood Plan comply with the NPPF and therefore deliver sustainable development.
- 5.2. The NPPF states that the planning system has three overarching objectives which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives).

Economic, social, and environmental objectives

- 5.3 These objectives give rise to the need for the planning system to perform a number of roles as defined by the NPPF and set out below.
- 5.4 The objectives and policies contained within the Saxmundham Neighbourhood Plan contribute towards each of these three objectives and cumulatively contribute to the achievement of sustainable development. How they achieve this is summarised below, Unsurprisingly, there is a degree of cross-over between policies and many contribute to more than one of the sustainable development objectives e.g. SAX1: General Design Principles which contributes to both social and environmental objectives.
- 5.5 The plan has been formulated with Sustainable Development at its heart and looks forward with an eye on the legacy created for future generations. The vision itself is essentially split into three parts which mirror the economic, social, and environmental dimensions of sustainable development.

¹ Resolution 42/187 of the United Nations General Assembly.

A thriving and prosperous town

- which acts as a key service centre and transport hub for the town and surrounding area
- with the physical and community infrastructure to support growth
- with new and varied employment opportunities, including in new and growing sectors, which take advantage of the connections offered by rail and the A12
- with a vibrant and viable town centre and a bustling weekly market, with strong retail, cultural, energy and hospitality sectors
- and adequate and convenient parking provision.

A safe and healthy town

- with good social, cultural and leisure provision contributing to the health and wellbeing of all ages
- with well used green open spaces and an enhanced network of green infrastructure providing access to nature and improvements to biodiversity
- with ease of movement throughout the town
- with safe routes for pedestrians and cyclists
- with good quality housing which meets the current and future needs of residents
- enjoying enhanced medical and educational facilities, which support healthy lifestyles
- where services and employment choices are local.

An attractive and distinctive town

- which is friendly and inclusive
- where new and existing development is successfully integrated forming a holistic and sustainable community
- which has a strong, wide-ranging cultural identity with well-equipped public venues and programmes of events and activities
- with a well maintained and valued historic town centre, enjoyed by visitors and residents alike.

5.6 The plan contains a set of five area wide objectives which cover the entire Neighbourhood Area together with seven objectives that cover the identified 'Opportunity Zones'. The objectives are identified in order to deliver the vision. These have been refined over time through public consultation. The objectives are grouped in five area themes covering: Local Economy, Community Infrastructure, Transport and movement, Housing, Heritage, and the Natural Environment. In addition there are specific objectives that have been developed for the identified 'Opportunity Zones of the South Saxmundham Garden Neighbourhood (where this falls within the Neighbourhood Area), Saxmundham Town Centre, Station Area and the Former Fromus Centre and Community Garden. It should be noted that the Opportunity Zones are not site allocations, but areas identified where the potential for future development could be explored further.

5.7 It should be noted that at the time of writing, it is anticipated that East Suffolk Council will shortly commence a consultation on recommendations as part of a Community Governance Review. This includes a recommendation to alter the boundary between Benhall and Saxmundham, which would result in the proposed South Saxmundham Garden Neighbourhood being located wholly within Saxmundham parish.

Area Wide Objectives:

Local economy

Objective 1: To promote a strong and diverse, forward looking, local economy, building upon the town's advantages as a service centre market town with a strategic location.

Community infrastructure

Objective 2: To secure for the community of Saxmundham a full range of physical and community infrastructure to meet the growing needs of the town and its environs.

Transport and movement

Objective 3: To improve transport and safe accessibility for the people of Saxmundham by foot, bicycle, mobility scooter and public or private transport, resulting in environmental and health benefits.

Housing

Objective 4 : To promote the development of high quality, energy efficient housing to meet the needs of the people of Saxmundham.

Heritage and natural environment

Objective 5: To protect and enhance the conservation area, the town's heritage, green spaces, natural features, and rural setting, and to address the challenges of climate change. Saxmundham.

Opportunity Zone Objectives:

South Saxmundham Garden Neighbourhood

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

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

Saxmundham Town Centre

Objective STC1: To create an attractive and welcoming town centre with space to gather and socialise, with a pedestrian friendly environment stretching from the station to Fromus Square and along the length of the High Street.

Objective STC2: To reduce the non-essential use of the High Street by motor vehicles and to prioritise pedestrian movement and safety in the centre, whilst improving and encouraging parking provision in accessible locations within walking distance of the town centre.

Objective STC3: To protect and enhance the historic core of the town as defined by the Conservation Area.

Objective STC4: To encourage the economic and environmental regeneration of the station area via a masterplan led approach, which encourages mixed-use redevelopment of underused and derelict land, and improves the attractiveness of Station Approach as a route for pedestrians and cyclists

Former Fromus Centre and Community Garden

Objective FFC1: To support a high-quality redevelopment for specialist and other housing purposes including community use, which safeguards the community garden, and offers improved pedestrian access to and permeability within, the site.

5.7 The objectives each support development whilst recognising the important of safeguarding and enhancing the special qualities that contribute to the specific character of Saxmundham.

5.8 The following table helps to further demonstrate the Plan’s comprehensive contribution to sustainable development.

NPPF Sustainable Development	Contribution through Saxmundham Neighbourhood Plan Policies
<p>NPPF 2021 An economic objective: to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places, and at the right time to support growth, innovation, and improved productivity; and by identifying and co-ordinating the provision of infrastructure.</p>	<p>Objective 1: To promote a strong and diverse, forward looking, local economy, building upon the town’s advantages as a service centre market town with a strategic location</p> <p>Objective STC1: To create an attractive and welcoming town centre with space to gather and socialise, with a pedestrian friendly environment stretching from the station to Fromus Square and along the length of the High Street.</p> <p>Objective STC4: To encourage the economic and environmental regeneration of the station area via a masterplan led approach, which encourages mixed-use redevelopment of underused and derelict land, and improves the attractiveness of Station Approach as a route for pedestrians and cyclists</p> <p>SAX2: Expansion of existing businesses encourages the small-scale expansion of existing businesses subject to criteria.</p> <p>SAX3: New businesses indicates a variety of employment sectors that will be supported within the town.</p> <p>SAXTC1: Town centre overarching strategy sets out the long-term overarching strategy for the town centre. It</p>

	<p>identifies specific areas and buildings that contribute to its character and reinforce the area’s distinctiveness. The policy seeks to underpin the town’s vitality and viability and ensure that users have a high sense of safety and belonging</p> <p>SAXSA1: Station area Opportunity Zone identifies an ‘Opportunity Zone’ around Station Approach and encourages suitable redevelopment for mixed uses whilst encouraging modal shift . It identifies environmental and public realm improvements and enhanced pedestrian and cycle connectivity.</p> <p>SAXSFR1: Street Farm Road Opportunity Zone. identifies two broad ‘Opportunity Zones’ at Street Farm Road that would be suitable for mixed use development, environmental enhancement and community uses.</p> <p>SAXFS1: Fromus Square Opportunity Zone identifies an ‘Opportunity Zone’ at Fromus Square where proposals which would enhance the retail, hospitality, and leisure use of the area, whilst preserving its character and facilitate its use for market purposes and enhance its overall visual quality will be supported.</p>
<p>NPPF 2021 A social objective: to support strong, vibrant, and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.</p>	<p>Objective 2: To secure for the community of Saxmundham a full range of physical and community infrastructure to meet the growing needs of the town and its environs.</p> <p>Objective 3: To improve transport and safe accessibility for the people of Saxmundham by foot, bicycle, mobility scooter and public or private transport, resulting in environmental and health benefits.</p> <p>Objective 4 : To promote the development of high quality, energy efficient housing to meet the needs of the people of Saxmundham.</p> <p>Objective SSGN1: To create a high quality, well designed, distinctive new development in line with ‘Garden City’ principles which is valued by its residents and recognised as an asset to the Town.</p> <p>Objective SSGN2: To successfully integrate - physically, environmentally, and socially - the new neighbourhood with the existing town and community of Saxmundham.</p> <p>Objective STC1: To create an attractive and welcoming town centre with space to gather and socialise, with a pedestrian friendly environment stretching from the station to Fromus Square and along the length of the High Street.</p>

	<p>Objective STC2: To reduce the non-essential use of the High Street by motor vehicles and to prioritise pedestrian movement and safety in the centre, whilst improving and encouraging parking provision in accessible locations within walking distance of the town centre.</p> <p>Objective STC4: To encourage the economic and environmental regeneration of the station area via a masterplan led approach, which encourages mixed-use redevelopment of underused and derelict land, and improves the attractiveness of Station Approach as a route for pedestrians and cyclists</p> <p>Objective FFC1: To support a high-quality redevelopment for specialist and other housing purposes including community use, which safeguards the community garden, and offers improved pedestrian access to and permeability within, the site.</p> <p>SAX4: Protecting valued local community facilities and amenities protects existing community facilities from loss either through change of use or redevelopment.</p> <p>SAX5: New community facilities sets out the priorities for new community facilities as identified by the community through consultation.</p> <p>SAX6: Improving connectivity seeks to improve connectivity and accessibility for pedestrians, cyclists, and users with a mobility impairment.</p> <p>SAX7: Footpaths and rights of way seeks to ensure that public rights of way are protected and enhanced.</p> <p>SAX8: Parking provision sets out the criteria for the provision of acceptable residential and non- residential parking.</p> <p>SAX9: Windfall and Infill development sets out the criteria for acceptable infill or windfall development.</p> <p>SAX10: Housing mix sets out the preferred mix for new housing development as identified by the community through consultation.</p> <p>SAX15: Community gardens and allotments supports the provision of new community gardens and allotments in new developments.</p> <p>SAX16: Green Spaces identifies a number of Local Green Space for protection together with an area of Suitable Alternative Natural Greenspace (SANG)</p> <p>SAXGN1: Connecting the Garden Neighbourhood identifies the specific pedestrian and cycling connections</p>
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	<p>that are required to make the Garden Neighbourhood sustainable and fully accessible to non -vehicular modes.</p> <p>SAXGN2: Green infrastructure links identifies the green infrastructure, open spaces, green links, and landscaping that is required to environmentally enhance the Garden Neighbourhood.</p> <p>SAXGN3: Community facilities identifies the community facilities that are required to support the development of the Garden Neighbourhood community.</p> <p>SAXTC1: Town centre overarching strategy sets out the strategy required to support the vitality and viability for the town centre in the longer term.</p> <p>SAXSA1: Station area Opportunity Zone identifies an opportunity zone around the Station Area where mixed uses, environmental enhancements and improved pedestrian and cycle connectivity is encouraged.</p> <p>SAXSFR1: Street Farm Road Opportunity Zone. identifies two opportunity zones at Street Farm Road where mixed uses including car parking, environmental enhancements and community uses will be supported.</p> <p>SAXFS1: Fromus Square Opportunity Zone identifies an opportunity zone for Fromus Square where a mix of retail and leisure use will be encouraged together with environmental enhancements and the provision of a market.</p> <p>SAXFC1: Former Fromus Centre site and Community Garden identifies the former Fromus Centre and Community garden as an opportunity zone for the provision of specialist housing for people with specific needs together with the retention of the community garden for community use.</p>
<p>NPPF 2021 An environmental objective: to protect and enhance our natural, built, and historic environment, including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p>	<p>Objective 5: To protect and enhance the conservation area, the town’s heritage, green spaces, natural features, and rural setting, and to address the challenges of climate change.</p> <p>Objective SSGN1: To create a high quality, well designed, distinctive new development in line with ‘Garden City’ principles which is valued by its residents and recognised as an asset to the Town.</p> <p>Objective SSGN2: To successfully integrate - physically, environmentally, and socially - the new neighbourhood with the existing town and community of Saxmundham.</p> <p>Objective STC3: To protect and enhance the historic core of the town as defined by the Conservation Area.</p>

	<p>SAX11: Historic town centre and Conservation Area seeks to protect the historic environment of the town including its listed buildings and the Conservation Area.</p> <p>SAX12: Non-designated Heritage Assets identifies a number of potential Non-Designated Heritage Assets within the town for special protection.</p> <p>SAX13: Gateways, views, and landscape setting of Saxmundham seeks to protect the landscape character and rural setting of the town. The policy identifies a number of locally important views together with important gateways to the town.</p> <p>SAX14: Protection and enhancement of natural assets protects existing natural assets of the parish and requires new development to provide a net gain for biodiversity.</p> <p>SAX15: Community gardens and allotments requires the provision of new community gardens and allotments in new developments.</p> <p>SAX16: Green Spaces identifies a number of proposed Local Green Spaces for protection.</p> <p>SAXGN2: Green infrastructure links identifies the green infrastructure, open spaces, green links, and landscaping that is required to environmentally enhance the Garden Neighbourhood.</p> <p>SAXSFR1: Street Farm Zone Opportunity Zone identifies two broad 'Opportunity Zones' at Street Farm Road one of which would be suitable for environmental enhancement and community uses</p>
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6. f) Compatibility with EU Obligations

- 6.1 The statement below demonstrates how the Saxmundham Neighbourhood Development Plan does not breach and is compatible with EU obligations. The United Kingdom formally left the European Union on the 31st January 2020, which was followed by an 11-month transition period that expired on 31st December 2020. Basic Condition (f) of the Neighbourhood Plan Regulations 2012 requires that the making of a Neighbourhood Plan should not breach nor be incompatible with European Obligations. These include those relating to environmental matters such as Habitats and Species.
- 6.2 East Suffolk Council recommends that the Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) Screening processes be undertaken by Pre-Submission stage. The Screenings were carried out by East Suffolk Council in February 2022 following a formal request from the Qualifying body in 2021.

Strategic Environmental Assessment (SEA)

- 6.3 Following a formal request, East Suffolk District Council began the SEA Screening Process in October 2021. The Strategic Environmental Assessment Screening Opinion produced by the Council in February 2022 determined there would be no likely significant environmental effects. Following consultation with the statutory bodies (Environment Agency, Historic England, and Natural England in April 2022), East Suffolk Council issued its screening opinion in May 2022, which concluded that: *“The Draft Saxmundham Neighbourhood Plan reviewed does not allocate land for built development and applies to a localised area. The plan has been prepared within the context of the strategic policies of the Suffolk Coastal Local Plan (September 2020) which has been subject to Sustainability Appraisal including Strategic Environmental Assessment and Appropriate Assessment under the Habitats Regulations Assessment. It is considered by East Suffolk Council that it is not necessary for a Strategic Environmental Assessment to be undertaken of the draft Saxmundham Neighbourhood Plan to ensure compliance with EU obligations”*
- 6.4 The Council have therefore concluded that an SEA would not be required, and the Saxmundham Neighbourhood Development Plan can be ‘screened out’ for its requirement of Strategic Environmental Assessment in line with the requirements of Directive 2001/42/EC.

Human Rights

- 6.5 In addition, the Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act 1998. The accompanying Consultation Statement sets out the process followed in terms of community involvement.

Conclusion

- 6.6 The Saxmundham Neighbourhood Plan therefore is compatible with EU Obligations and satisfies this basic condition.

7. g) Prescribed matters

- 7.1 An additional basic condition is prescribed under Regulation 32 of the Neighbourhood Planning (General) Regulations 2012 as follows:

‘The making of the Neighbourhood Development Plan is not likely to have any significant effect on a European Site (as defined in the Conservation of Habitats and Species Regulations 2010 (2)) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c) Regulations 2007 (3)), (either alone or in combination with other plans and projects)’.

- 7.2 Although the parish of Saxmundham itself does not contain any European Protected Nature Conservation Sites it is in relatively close proximity to the extremely sensitive Sandlings, Alde-Ore and Minsmere-Walberswick Special Protection Areas and also within the 13km Zone of Influence for the Council’s Recreational Disturbance Avoidance and Mitigation Scheme (RAMS).

Habitats Regulation Assessment (HRA)

- 7.4 The process for testing the plan against the relevant regulation is through Habitats Regulation Assessment (HRA). The HRA screening took place during the same timescale as the SEA Screening (February 2022- April 2022) and was undertaken by East Suffolk Council. The HRA Report takes into account the latest regulations, guidance and court judgements relating to this area including CJEU People Over Wind v Coillte Teoranta C-323/17 which rules that mitigation measures cannot be taken into account when carrying out a screening assessment to decide whether a plan or project is likely to result in significant effects on a Habitats site. The HRA Screening Report therefore does not consider mitigation measures within the assessment of Likely Significant Effects resulting from the Saxmundham Neighbourhood Development Plan. The Screening report also considers the impact of the judgement CJEU Holohan C- 461/17, which imposes more detailed requirements in the competent authority at Appropriate Assessment Stage.

- 7.5 The HRA produced by East Suffolk Council in February 2022 , concluded that: *“The Saxmundham Neighbourhood plan includes adequate reference to the requirements of the Suffolk Coast RAMS and additional green infrastructure requirements and therefore it is concluded that the Saxmundham Neighbourhood Plan will not lead to any adverse effects on protected Habitat Sites.”*

The report was then the subject of consultation with Natural England who confirmed in April 2022 that they agreed with the conclusion of the Screening Report that there are unlikely to be significant environmental effects from the proposed plan.

- 7.6 Natural England has been consulted on the pre-submission version of the Saxmundham Neighbourhood Plan and has contributed to the SEA and HRA Screening processes. There are no national and international designations within the parish of Saxmundham although there are internationally important sites within relatively close proximity. These however have been considered as part of the SEA and HRA Screening Processes and through the Local Plan resulting in the identification of the SANG south of the town

and the inclusion of mitigation measures relating to RAMS within the supporting text to Policy SAX14.

Conclusion

- 7.7 The Saxmundham Neighbourhood Plan has been prepared to be in general conformity with the relevant policies in the Local Plan and will not lead to likely significant effects on protected European sites. The Saxmundham Neighbourhood Plan therefore is compatible with the requirements of Neighbourhood Planning (General) Regulations 2012 and satisfies this basic condition.