

## Babergh District Council



## Holbrook Neighbourhood Plan 2022 - 2037

### Reg 16 Submission consultation responses

On 16 October 2022, Holbrook Parish Council (the 'qualifying body') submitted their Neighbourhood Development Plan to Babergh District Council for formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended). The consultation period ran from Monday 28 November 2022 until Wednesday 25 January 2023.

Twelve representations were received. They are listed below and copies are attached.

Ref No.	Consultee
(1)	Suffolk County Council
(2)	Babergh District Council
(3)	Natural England
(4)	Historic England
(5)	Anglian Water
(6)	National Highways
(7)	Defence Infrastructure Organisation, obo the MOD
(8)	Sport England
(9)	Resident - Hooton
(10)	James Lawson Planning Ltd, obo The Royal Hospital School
(11)	Savills (obo Mr and Miss Barker)
(12)	Strutt & Parker, obo Greenwich Hospital Trust

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# (1) SUFFOLK COUNTY COUNCIL

Date: 25 January 2023  
Enquiries to: Georgia Teague  
Tel: [REDACTED]  
Email: [REDACTED]  
[neighbourhoodplanning@suffolk.gov.uk](mailto:neighbourhoodplanning@suffolk.gov.uk)



Spatial Planning Policy Team,  
Babergh & Mid Suffolk District Councils,  
Endeavour House,  
8 Russell Rd,  
Ipswich, Suffolk,  
IP1 2BX

Dear Mr Bryant,

## **Submission Consultation version of the Holbrook Neighbourhood Plan**

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Holbrook Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood 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)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in *italics* and deleted text will be in ~~strikethrough~~.

### Natural Environment

#### *Policy HNP06: Protection of Important Views*

Figure 2 displays the Holbrook Parish Plan Area, which is the boundary for the neighbourhood plan.

SCC notes that Figure 6, showing the Important Views, displays viewpoints 1, 9, and 13 as appearing to be located from outside of the neighbourhood plan area boundary, and looking into the parish.

SCC queries as to whether a viewpoint should be located from outside of the jurisdiction of the parish (in this case, Stutton for Viewpoint 9, and Freston for Viewpoint 1 and 13).

The Definition of a Neighbourhood Plan in the NPPF is “A plan prepared by a parish council or neighbourhood forum for a designated neighbourhood area”. SCC is unsure if a neighbourhood plan can include aspects that are located in adjacent parishes in its policies.

Paragraph 16, part b) of the NPPF states that plans should be “unambiguous”, and it is not clear from figure 6 the exact origins of the views being displayed.

#### *Policy HNP14: Local Green Spaces*

During the Reg14 consultation, SCC raised the concern over the size of the designated Local Green Space of Holbrook Garden/Fishponds, in that it may be deemed as an “extensive tract of land”.

In the Halesworth neighbourhood plan, the Millennium Green was designated as a Local Green Space. We raised our concerns here also of the large size of this site at 20ha.

The examiner’s report<sup>1</sup> paragraph 7.38 stated “it is significantly larger than other LGSs which have been promoted in neighbourhood plans elsewhere in East Suffolk and England. Whilst Planning Practice Guidance does not define the extent to which a proposed LGS should be ‘local in character and not an extensive parcel of land’ I am not satisfied that the Green as proposed in the Plan meets this test in paragraph 102 of the NPPF”.

As a result, the examiner proposed the Millennium Green be broken down into 11 individual sites, in order to meet the criteria of the NPPF paragraph 102.

Holbrook Gardens is stated as 137.5 acres, which is approximately 55.6ha, over double the size of the Millennium Green in Halesworth.

As indicated by paragraphs 3.7 and 5.34 of the Reg16 draft of the Holbrook Neighbourhood plan, “the extensive post-medieval landscape of Holbrook Gardens”, this is a large plot of land.

Holbrook Gardens is also already designated as a County Wildlife site, and part of the Fishpond area falls within the AONB (as indicated on page 95 of the R16 Holbrook Neighbourhood Plan).

The NPPF indicates in paragraph 176 that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues” and in paragraph 177: “When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest” .

The Local Green Space<sup>2</sup> section of the PPG states: “If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.”

As such, with the designations of County Wildlife Site and AONB, it could be established that the Holbrook Gardens and Fishponds are already covered by other specific protections.

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<sup>1</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Neighbourhood-Planning/Designated-Neighbourhood-Areas/Halesworth/Halesworth-Neighbourhood-Development-Plan-examiners-report.pdf>

<sup>2</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#Local-Green-Space-designation>

We acknowledge that the proposed Local Green Space site Holbrook Gardens has significance environmentally, historically, and to the community. However, in order to meet basic condition a) and to meet the criteria set out the NPPF paragraph 102, it is suggested that this site is reviewed, and potentially divided into smaller sites in order to not be considered as an extensive tract of land, such as “Holbrook Gardens fishponds” “Holbrook Gardens woods” etc., or removed from the plan in its entirety due to its existing protections.

Further to this, and whilst not strictly a matter for the Basic Conditions, we note that Figure 7 displaying the designated Local Green Spaces does not clearly display the full size of site 11 Holbrook Creek. In order to provide greater clarity and to the reader regarding the size and context of these sites, it is suggested that this image is amended to display all sites in full.

SCC also notes that Appendix B Local Green Space justification table does not include the area size for sites 7: Allotments and 8: Alton Water Reservoir. SCC suggests that the site sizes should be added to provide context to the reader. It is also difficult to judge if a site is deemed as “not an extensive tract of land” if the size of the site has not been provided.

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Yours sincerely,

Georgia Teague  
Planning Officer  
Growth, Highways, and Infrastructure

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## (2) BABERGH DISTRICT COUNCIL

Our ref: Holbrook NP R16 Response  
Dated: 25 January 2023

*Sent from/ to: the Planning Policy Team,  
Addressed to: Janet Cheesley (Holbrook NP Examiner]*

Dear Janet,

- 1. Holbrook Neighbourhood Plan 2022 - 2037**
- 2. Reg 16 Submission Consultation – Comments from Babergh District Council**

This response is made for and on behalf of Robert Hobbs (Corporate Manager for Strategic Planning at Babergh & Mid Suffolk District Councils).

The District Council welcomes the changes that have been made to the Holbrook Neighbourhood Plan (the 'HNP') in response to our previous consultation response. We also recognise that the Working Group were finalising and submitting their plan at a time when decisions on how our own Joint Local Plan (the 'JLP') would be progressed were still being finalised. The basics of this are covered in Chapter 3, where the HNP explains that the JLP will now come forward as a Part 1 and Part 2 document, but this does now leave the HNP making reference to specific JLP policy numbers etc. which are likely to change. We explore this further in the appended document and propose a way forward.

There are other areas too where we feel that the HNP can be further improved, or which may simply have been overlooked during its submission preparation. These too are set out as succinctly as possible in the appended document. Subject to your agreement, we propose that many of these fall into the category of minor modifications.

We trust that all of our comments are helpful.

Yours sincerely

Paul Bryant  
Neighbourhood Planning Officer | Babergh & Mid Suffolk District Councils  
T: 01449 724771 / 07860 829547  
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## Reg 16 Submission draft Holbrook NP 2022 - 2037

### Comments and further observations from Babergh District Council

#### 1. Joint Local Plan references

As mentioned in our covering letter, because of the changes being made to our emerging JLP, it is very likely that cross references to this contained within the HNP will be out of date before the HNP reaches the referendum stage. We propose two options for addressing this:

- **Option 1:** Leave the JLP references for now but include some explanatory text at the start of the HNP [‘Chapter 2 - Preliminaries’ seems the logical place for this] which explains that:

*“Where the HNP refers quotes from the Babergh & Mid Suffolk Joint Local Plan (JLP), that means the Pre-submission (Reg 19) document published for consultation in November 2020. As explained in Chapter 3, the Parish Council are aware that the JLP will now be progressed as a Part 1 and Part 2 document, and that modifications to the JLP will mean that some of those references may change. These will all be updated when the HNP is next reviewed.”*

- **Option 2:** Allow the District and Parish Council to review each cross reference on a case by case basis and update it where necessary. For example, para 10.42 could be amended to read:

*“The JLP also recognises that dark skies also have a role to play in contributing towards the character, sense of place and local values attached to particular landscape.”*

Connected to this, the penultimate sentence in para 3.4 needs updating to reflect the latest JLP timetable. For now, we suggest:

*“Part 1 of the Local Plan is expected to be published for modification consultation in Winter 2022/23, with Part 2 to be completed by 2025.”*

#### 2. Figures (maps, photos etc.)

The sequential numbering of the Figures [maps, photos etc.] needs addressing. We note that:

- Figure 1 (page 27) is now, presumably, Figure 11. There is no direct cross reference to this in the supporting text, but this could be added to para 6.16
- Figure 23 (page 37) and Figure 14 (page 38) are now, presumably, Figures 12 and 13. The cross-reference to these in para 9.4 will need updating. We also suggest that:
  - the last sentence in para 3.9 be amended to read: *“For the purposes of this neighbourhood plan, we have adopted and will use the settlement boundaries for Holbrook and Lower Holbrook identified in November 2020 version JLP. These boundaries are shown in Figures 12 and 13 (on pages xx and yy) and on the Policies Map”*
  - regarding the Figures themselves, present these without any Babergh & Mid Suffolk logo etc. to avoid misunderstanding given that the Nov. 2020 JLP are not to be used.
- Figure 15 (page 48) is now, presumably, Figure 14. There is no cross-reference to this in the supporting text but this could be added in para 10.26, where it refers to *“the accompanying proposals map”*

- Figure 6 (page 58) is now, presumably, Figure 15. The cross reference to this at the end of the first paragraph in Policy HNP 06 will need updating.
- Figure 7 (page 81) is now, presumably, Figure 16. The cross reference to this this at the end of the first paragraph in Policy HNP 14 will need updating.

With regard to para 3.16, Figure 2 (page 8), and para 10.58 ... all should be amended to read 'Holbrook Neighbourhood Plan area'. Parish Plans and Neighbourhood Plans carry different weight in planning terms and it would sensible not to confuse them here.

### **3. HNP 02: Housing Mix**

This is an improvement on its predecessor but is still trying to address three separate issues:

- set a requirement that housing reflects local needs (as assessed through their AECOM study)
- set out criteria for guiding affordable housing delivery
- set out criteria for affordable housing sites

Taking the key wishes from the policy, and addressing our own concerns around the ambiguity of what 'local connection' might mean, we have re-written the policy to provide guidance and flexibility:

#### ***HNP 02: Housing mix, type and tenure***

*In order to contribute to the existing and future needs of the Parish and facilitate a cohesive community, proposals for new housing development must demonstrate how they respond to assessed local housing needs, with priority to be given to:*

- *Addressing the needs of younger households,*
- *Meeting the needs of an ageing population, including by providing bungalows and opportunities for downsizing, and*
- *Prioritising 1-, 2- and 3-bed homes.*

*Support will also be given to schemes that deliver accessible and adaptable homes.*

*Where major development is required to provide affordable housing, the mix of affordable homes should reflect assessed needs and:*

- *Be made available for people whose needs are not met by the market, in line with national policy,*
- *Be designed to be integral to the development as a whole and visually indistinguishable from the open market units and*
- *Be allocated in line with Babergh District Council Allocations Policy.*

*Rural Exception Sites will be supported when they meet a proven local need, in locations adjacent or well related to the settlement boundary for Holbrook.*

### **4. HNP 05: Design**

We make the following recommendations:

- Remove 'conservation area or conservation assets' from criterion 2. As mentioned in para 10.37, there is no designated Conservation Area in Holbrook, and the protection of heritage assets (including their setting) are addressed elsewhere in Policy HNP 10.

As an aside to the above, it would also be more factually correct to begin para 10.37 with: “Holbrook does not have designated Conservation Area, but does sit ...[etc.]”

- There is some repetition between criterion 4 and 6. We suggest these could be amalgamated and, as a starting point, propose the following wording:

*“Development proposals should incorporate good pedestrian and cycle routes within the development and maximise opportunities for residents to travel sustainably (walking, cycling etc.) by ensuring that adequate links exist or can be provided into the village centre and to the local schools.”*

- The HNP includes references to play areas and the health and well-being benefits these provide, but not all of these areas appear to be accessible at all times and it is noted that Reade Field is said to provide “*the only formal children's play area with apparatus in the village.*” To encourage communities to be more active our Public Realm Team have suggested that the HNP may wish to include a reference to: ‘*new development proposals having regard to the Fields in Trust Guidance on the provision of public open space and play areas* . If acceptable, this could be added as a new criteria under the Design and Materials sub-heading.

[The guidance itself can be found at: <https://www.fieldsintrust.org/guidance>]

## 5. **HNP 06: Protection of Important Views**

**Views 9 and 10** are arguably one and the same and we suggest that these could be merged and the description amended accordingly.

**View 14:** This appears to be a late addition to the HNP. The location point for this view is not shown on the map on page 58 or on the Policies Map, but, from the description, is presumed to be the view you would see travelling north along the B1080 just after negotiating the bend [see screen shots below]. If so, and if this view is to be retained, the description and the relevant maps should be updated accordingly.



Left and Above: Screen shots taken from Google Earth to illustrate what is presumably 'Important View 14'

## 6. HNP 10: Protection of Heritage Assets

The reference to ‘non-designated heritage assets’ in the first paragraph of policy HNP 10 should be deleted to avoid confusion. Paragraph 10.64 advises that the Parish Council may include a list of locally important heritage assets and historic features as part of a future revision of the HNP, in which case, it would be appropriate to then revisit the policy wording.

The Council’s Heritage Team have also suggested that the Parish Council may wish to include a map in the HNP to show the location of the designate heritage assets. If this is something they wish to explore we will be happy to assist.

## 7. HNP 13: Biodiversity

This policy has been amended to broadly comply with the suggested wording we put forward in our Reg 14 response. The first paragraph and criteria A), B) and C) have all been carried over from the previous draft policy and should be deleted as they simply repeat what follows.

The Consultation Statement (page 103) makes reference to the Environment Act 2021 and, with that in mind, we suggest that the fourth paragraph could be amended to read as follows:

*“Otherwise acceptable development proposals will be supported where they provide a minimum net gain of 10% in biodiversity, rising to 20% where possible through for example:*

*i) the creation, restoration and enhancement of new natural habitats including ponds*

Our final comment is probably beyond the scope of what is achievable in this iteration of the HNP but provides an opportunity for us to let the Parish Council know that there has been a growing interest from third parties on raising the bar in terms of providing better biodiversity supporting evidence through the neighbourhood plan process. That could be more information on benchmarking the condition of identified open spaces and looking at opportunities for enhancement / increasing connectivity between these spaces. If this is something that the Parish Council are interested in, with a view to incorporating the outcomes in a future review of their Plan, we would be happy to discuss that at the appropriate time.

## 8. HNP 14: Local Green Spaces

We note that all fourteen Local Green Spaces have been retained from the R14 HNP. In our response to that, we cautioned that LGS 13 Holbrook Gardens / Fishponds, and LGS 8 Alton Water, might fall foul of NPPF paragraph 102 c)., which states that the green space should “*not be an extensive tract of land*”. We also queried to extent of LGS 11 Holbrook Creek, as this was unclear from the provided map.

Reviewing these sites again we make the following points:

**LGS8:** Planning Guidance does not give a threshold measurement above or below which a LGS would fall into the extensive tract of land category but, at an estimated 35 hectares (86 acres), we suggest that this site is not suitable for designation on the basis of area alone.

Anglian Water may also submit a representation of their own on this proposed designation.

**LGS 11:** The full extent of this LGS is still unclear from the map on page 81, but the Policy Map [page 103] suggest it covers an area of approx. 6 hectares (14 acres). That would seem reasonable but, given that Holbrook Creek is already protected by virtue of it being within the 'Stour & Orwell Estuaries Ramsar area' and the 'Suffolk Coast & Heaths AONB', adding a further layer of designation seems unnecessary.

**LGS 13:** While the historical importance of this LGS to the locally community is recognised, at approx. 55 hectares (137 acres) this also represents an extensive tract of land, which makes its designation questionable. LGS 13 also falls within the designated 'Suffolk Coast & Heaths AONB' area and therefore already benefits from significant protection.

## 9. Miscellaneous

- **Para 3.13:** As mentioned in our R14 response, this reads as a repeat of para 3.8 and we suggest it could be safely deleted.
- **Para 5.6** [and source link # 24, page 102]: The parish level 2021 Census figures are not available yet but, for now, we suggest replacing the 2015 Holbrook Ward population estimate figure in para 5.6 with the more relevant and up to date 'Mid-year (2020) population estimate' figure of 2,147 for the parish which can be sourced from the Suffolk Observatory website:

<https://www.suffolkobservatory.info/population/reports/#/view-report/a337450d5c3144d3ab93ddf99168c5fe/E04009099/G87>

- **Para 5.7.1:** The last sentence needs amending as follows: 'Figure **4**'
- **Para 9.1:** While conscious this repeats our previous comment, we maintain that the second sentence in para 9.1 [" ... no further development is required until after 2037."] is misleading and should be deleted. Small windfall sites may still come forward during the plan period.
- **Para 10.41 & 10.43:** To avoid repetition, we suggest that para 10.43 be deleted and that para 10.41 be amended to read:

*"The National Planning Policy Framework notes in paragraph 185 : ~~By encouraging good design,~~ **that** "Planning policies and decisions should [...] limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation." In the 2018-2023 AONB Management Plan [8] it states that "Adopting best practice in the careful use of lighting must be an increasing priority for local authorities, businesses and residents within the Suffolk Coast & Heaths AONB."*

[Ends]

### (3) NATURAL ENGLAND

Date: 09 December 2022  
Our ref: 414537  
Your ref: Holbrook Neighbourhood Plan



Mr P Bryant  
Babergh & Mid Suffolk District Council  
[communityplanning@baberghmidsuffolk.gov.uk](mailto:communityplanning@baberghmidsuffolk.gov.uk)

Hornbeam House  
Crewe Business Park  
Electra Way  
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**BY EMAIL ONLY**

T 0300 060 3900

Dear Mr Bryant

#### **Regulation 16 of the Holbrook Neighbourhood Plan**

Thank you for your consultation on the above dated 25 November 2022

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft regulation 16 of the Holbrook neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Joanne Widgery  
Consultations Team

# Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

## Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas (NCAs)** divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>4</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty (AONB)**, the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>5</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>8</sup> sets out supporting guidance.

**Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.**

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>5</sup> <http://magic.defra.gov.uk/>

<sup>6</sup> <http://www.landis.org.uk/index.cfm>

<sup>7</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/807247/NPPF\\_Feb\\_2019\\_revised.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf)

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

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<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>11</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>12</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup> <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) <sup>14</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

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<sup>14</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

## (4) HISTORIC ENGLAND



Historic England

Mr Paul Bryant  
Babergh & Mid Suffolk District Councils

Direct Dial: [REDACTED]

Our ref: PL00383683  
18 January 2023

Dear Mr Bryant

### Ref: Holbrook Neighbourhood Plan Regulation 16 Consultation

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: [<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>](https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/)

We would be grateful if you would notify us on [eastplanningpolicy@historicengland.org.uk](mailto:eastplanningpolicy@historicengland.org.uk) [<mailto:eastplanningpolicy@historicengland.org.uk>](mailto:eastplanningpolicy@historicengland.org.uk) if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James  
Historic Places Advisor, East of England  
[Edward.James@HistoricEngland.org.uk](mailto:Edward.James@HistoricEngland.org.uk)

CC:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



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## Anglian Water Consultation Response

### Holbrook Neighbourhood Plan Consultation – Regulation 16

#### 1. Anglian Water

- 1.1. Anglian Water is the water and water recycling provider for over 6 million customers in the east of England. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea.
- 1.2. Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, above and beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

#### 2. Anglian Water and Neighbourhood Development Plans

- 2.1. Anglian Water is the statutory water and sewerage undertaker for the Holbrook neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources.

#### 3. Commentary on the Holbrook Neighbourhood Plan

- 3.1. The following comments are made in relation to ensuring the making of the neighbourhood plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water.

##### HNP 5 Design

- 3.2. We welcome this policy which includes support for the use of environmental and sustainable measures for new development. We would welcome consideration by the neighbourhood plan group to include reference within the supporting text to water efficiency fixtures and fittings and opportunities for rainwater harvesting and greywater recycling as additional sustainable construction measures to be considered by applicants.

##### HNP 12 Sustainable Drainage and Flood Risk

- 3.3. We support the aims of the policy, particularly regarding the requirement for SuDS (Sustainable Drainage Systems) to provide multi-functional benefits for new development through the primary purpose of mitigating surface water flood risk.

##### Alton Water

- 3.4. We welcome the reference to Alton Water, that provides employment and recreational opportunities for the local community, in addition to opportunities for improving biodiversity in the area.

3.5. Alton Water has been supplying vital water resources to a large part of Suffolk for almost 50 years. The water treatment works is within the neighbourhood plan area and treats around 10 million gallons of water a day. The reservoir has consistently achieved the Green Flag Award, and for the first time in 2022, the site has been awarded the Green Heritage Site Accreditation.

#### HNP 14: Local Green Spaces

3.6. Whilst we welcome the recognition by the community that Alton Water is a valued amenity space for leisure and recreation, we consider that the proposed designation of Alton Reservoir Waters as a Local Green Space (LGS) is inappropriate and unnecessary for the following reasons:

- The reservoir is primarily required for the supply of water to a large area of Suffolk and therefore is a critical infrastructure asset that may require investment and infrastructure to support its future operation and management in addressing challenges such as population growth, and climate change impacts.
- The entirety of the reservoir waters is not wholly within the neighbourhood plan area. therefore, it would not be appropriate to apply a 'partial local green space designation' to this area of our estate, which includes water abstraction infrastructure.
- The area of the reservoir waters does not satisfy the NPPF (National Planning Policy Framework) test - in that it applies to an extensive tract of land and water - as previously highlighted by Babergh District Council and Suffolk County Council in their Reg. 14 responses. It is estimated that the proposed area of land and water is more than 20 hectares in its extent.
- Alton Water has a Local/County Wildlife Site designation and therefore has certain protections through Local Plan policies. This is also identified by the neighbourhood plan in Appendix B. In addition, Alton Water has Green Flag award status, Green Heritage Site accreditation, and there is a network of Public Rights of Way that provide access to Alton Water in addition to other trails we provide and maintain around the entire reservoir.

3.7. **We therefore object to this designation and request that LGS8 Alton Reservoir Waters is removed from the policy.**

#### 4. Conclusion

4.1. Anglian Water is supportive of the Holbrook Neighbourhood Plan policies regarding design of new development and requiring sustainable drainage systems to minimise flood risk. However, we are concerned that the proposed LGS designation of a partial area of Alton Water is not fully justified and does not meet the NPPF tests. Whilst we are encouraged that the local community values the leisure and wildlife opportunities provided by Alton Water, we consider that there are existing policy protections that apply to Alton Water as a whole, and a partial designation would not be appropriate. We would therefore welcome the deletion of Alton Reservoir Waters from Policy HNP 14.

## (6) NATIONAL HIGHWAYS

**E from:** Spatial Planning Team National Highways  
**Rec'd:** 5 December 2012  
**Subject:** ...

### **Holbrook Neighbourhood Development Plan (NDP) – Regulation 16 ( 28 Nov 2022 to 25 Jan 2023) Consultation**

Dear Sir/Madam,

Thank you for consulting National Highways on the above Neighbourhood Development Plan.

National Highways is a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). In respect to this Neighbourhood Plan, the nearest trunk road is A12 and A14.

We have reviewed the plan and note the area and location that is covered is remote from the A12 or A14. With respect to the proposed neighbourhood site location, all these are remote from our strategic road network.

Consequently, National Highways offers 'No Comment' to this application.

Please contact us [PlanningEE@nationalhighways.co.uk](mailto:PlanningEE@nationalhighways.co.uk) if you require any clarification.

**Shamsul Hoque**, PhD MCIHT FBIP FIAB  
Spatial Planning Team  
Operations (East)  
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

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**National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | [info@nationalhighways.co.uk](mailto:info@nationalhighways.co.uk)**

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## (7) DEFENCE INFRASTRUCTURE ORGANISATION, obo the MOD



Defence  
Infrastructure  
Organisation

Christopher Waldron

Ministry of Defence

Safeguarding Department

DIO Head Office

St George's House

DMS Whittington

Lichfield

Staffordshire WS14 9P'

Your reference: Holbrook Neighbourhood Plan 2022 -  
2037 Reg 16 consultation

Mobile: +44 (0) 7800 505824

Our reference: 10053353

E-mail: [DIO-Safeguarding-Statutory  
\(MULTIUSER\) DIO-Safeguarding-  
Statutory@mod.gov.uk](mailto:DIO-Safeguarding-Statutory(MULTIUSER)@mod.gov.uk)

Paul Bryant  
Neighbourhood Planning Officer  
Babergh and Mid Suffolk District Councils  
Endeavour House  
8 Russell Road  
Ipswich  
IP1 2BX

24th January 2023

Dear Paul

It is understood that Babergh District Council are undertaking a consultation regarding their Holbrook Neighbourhood Plan 2022 - 2037 consultation under Regulation 16. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

The MOD may be involved in the planning system both as a statutory and non-statutory consultee with statutory involvement stemming from consultation occurring as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

**Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.**

The MOD have an interest within the area covered by the Holbrook Neighbourhood Plan 2022 - 2037 in a new technical asset known as the East 2 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Holbrook Neighbourhood Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern.

**Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.**

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely



Chris Waldron  
DIO Assistant Safeguarding Manager

## (8) SPORT ENGLAND

**E from:** Planning Administration Team – Sport England

**Rec'd:** 21 December 2022

**Subject:** Holbrook Neighbourhood Plan

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework** (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely

Planning Administration Team

[Planning.central@sportengland.org](mailto:Planning.central@sportengland.org)

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[Ends]

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## (9) Resident - Hooton

Rec'd by email: 15 January 2023

Dear Mr Bryant

Please find attached my consultation response form for the Holbrook Neighbourhood Plan 2022-2037 Submission Version (Oct 2022)

In addition to my formal comments attached, you may wish to also note the following errors (red) and their corrections (blue) for the plan ahead of examination:

- Para 10.76 .....(Suffolk [Coast](#) RAMS).....
- Paras 10.73 and 10.78..... [RAMSAR](#) Ramsar (then name of the town in Iran where the international Convention was held in 1971.)
- HNP13 Suffolk Coast Recreational [D](#)disturbance Avoidance and Mitigation Strategy and Suffolk Coast Recreational [al D](#)disturbance Avoidance and Mitigation Strategy

Yours sincerely

### Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	S Hooton
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	
Address:	
Postcode:	
Tel No:	
E-mail:	

## Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

<b>Paragraph No.</b>	80	<b>Policy No.</b>	HNP 14
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**Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)**

<b>Support</b>		<b>Oppose</b>	
<b>Support with modifications</b>	yes	<b>Have Comments</b>	yes

**Please give details of your reasons for support / opposition, or make other comments here:**

We submitted information to the previous consultation supporting the inclusion of the Stag Beetle reserve (at the junction of Firebronds Road/Ha'penny Field) as a designated Local Green Space. We are concerned that the submission missed the deadline and was not considered for this important area for biodiversity (now owned and managed by Babergh DC under a planning requirement B//97/00884) and it has not been included in Policy HNP14.

In line with Appendix B – LGS justification, the following provides the necessary justification for this additional greenspace to be added to HNP14:

**Name of Green Space** - Firebronds Road/Ha'penny Field Stag Beetle Reserve

**Green space is in reasonably close proximity to the community it serves (is it close to existing dwellings or someway out of the village?)** Yes

**Green space is demonstrably special to the local community because of its beauty, historic significance, recreational value, tranquillity, or wildlife value** – Valued for its wildlife value, particularly for Stag Beetle (A Priority species) as recognised at application stage under B//97/00884 and the area was safeguarded and now owned and managed by Babergh DC for this reason (see Public Realm for boundary map). As the grassland area with old tree stump for Stag Beetle larvae is immediately adjacent to both roads with a pavement on two sides, it has full public view and access for appropriate management.

**Green space is local in character and not an extensive tract of land (roughly how big is it? < 1 acre, 1-2 acres etc) < 1 acre**

**Comments** – A significant biodiversity asset. Easily accessible from the village centre and Reade Field on foot.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

We request that Firebronds Road / Ha'penny Field stag beetle reserve is added to HNP14 as an Local Green Space as it meets the NPPF para 102 requirements.

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the matter through the written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

Note: The decision on whether to hold a hearing is entirely at the discretion of the Examiner

<b>I consider that a hearing should be held because ...</b>
<i>Please be as brief and concise as possible ..</i>
<i>(Continue on separate sheet if necessary)</i>

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	yes
The final 'making' (adoption) of the Holbrook NP by Babergh District Council	yes

<b>Signed: S Hooton</b>	<b>Dated: 15/01/2023</b>
-------------------------	--------------------------

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e: james@jameslawsonplanning.co.uk

Holbrook Neighbourhood Plan  
Consultation  
C/o Paul Bryant -Spatial Planning Policy  
Team  
Babergh District Council  
Endeavour House, 8 Russell Road  
Ipswich  
Suffolk, IP1 2BX

t: 01206 510095

Co. Reg. No. 13100476

18<sup>th</sup> January 2023

Dear Sir,

## **Holbrook Neighbourhood Plan Submission Draft (Regulation 16) Consultation – Representations on Behalf of The Royal Hospital School, Holbrook, IP9 2RX**

Thank you for consulting JLP on behalf of The Royal Hospital School (RHS) and we are pleased to submit representations to the Submission Draft (Regulation 16) Consultation in the following format;

- ❖ This letter – based submission which requests minor changes to the wording of Policy HNP 04 & supporting paragraphs, relating to the need for school campus modernisation as well as campus expansion;
- ❖ 5 x form-based representations reflecting the minor changes sought to the draft Neighbourhood Plan & Policies Map referred to above;
- ❖ An accompanying plan which requests minor changes to the Policies Map;

These representations **SUPPORT** the vision, objectives, overarching planning context/ strategy and policies of the draft Holbrook Neighbourhood Plan (HNP).

The HNP is considered to **MEET EACH BASIC CONDITION** and provides an appropriate planning framework for delivering the sustainable growth and conservation of the village - ensuring a balanced, vibrant and thriving community to 2037 and beyond.

The consultative engagement undertaken by The School as part of the Neighbourhood Plan process, its consistency with national and development plan policy, along with the planning purpose for the requested changes referable to RHS are outlined below.

## **RHS Modernisation & Campus Expansion**

### **Consultative Engagement & Consistency With National & Development Plan Policy\***

We welcome the HNP's recognition of The School's need to invest in, modernise and expand its campus - based infrastructure, education and sports facilities, in order to remain financially viable and competitive, whilst continuing to provide for community use of its facilities.

This approach is required to maintain RHS as a leading nationally recognised academic institution - which continues to deliver important planning benefits at the village level as Holbrook's largest employer and a key community facility provider, as recognised in the HNP.

The inclusion of **Policy HNP 04: Royal Hospital School (RHS)** along with the supporting text, Figure 15 Plan and the Policies Map, is underpinned by the consultative engagement undertaken with key bodies by The School since 2017, including the Babergh & Mid Suffolk DC planning policy, development management and conservation officers, Historic England policy and project officers, and the Neighbourhood Plan Group.

### **Basic Conditions Statement**

The Basic Conditions Statement acknowledges that Policy HNP 04: Royal Hospital School is consistent with National Planning Policy Framework (NPPF) guidance set out in paragraphs 8b, 81 and 93.

We would also add that Policy HNP 04 is consistent with NPPF paragraph 95 – which requires a sufficient choice of school places to be available to meet the needs of communities, giving great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications.

In addition, we would add that Policy HNP 04 is consistent with draft Policy LP34 (Health & Education Provision) of the Babergh & Mid Suffolk Joint Local Plan (Regulation 19) Pre-Submission Document, which responds positively to and supports the creation of education facilities and extensions to existing facilities, including where community use of the facilities takes place, as is the case with RHS.

Policy HNP 04 along with the Figure 15 Plan identifying two indicative locations for future campus expansion (and the Policies Map which identifies the RHS site specific policy area) therefore has a clear planning rationale and policy justification, and is compliant with national and local planning policy for investment in, expansion and development of educational institutions, rural employment and community facilities, in order to achieve sustainable development.

### **RHS Modernisation & Campus Expansion – Minor Plan Changes**

As stated above, the inclusion of **Policy HNP 04: Royal Hospital School (RHS)** along with the supporting text, Figure 15 Plan and Policies Map, is welcomed by The School.

Whilst the supporting paragraphs to Policy HNP 04 clarify the need for **'Campus modernisation and expansion'** the policy itself omits reference to **'modernisation'** which is a key component of the investment associated with The School's Capital Development Plan.

In particular, it is necessary to modernise the existing 1960's structures on the site, such as the Science Block, which does not provide for a sufficiently modern standard of teaching space or specification of facilities now required by the teaching/ laboratory staff and students.

A change is therefore requested to the wording of Policy HNP 04 to include reference to modernisation, as well as The School's future need for expansion which is included within the Policy.

In addition, minor changes are requested to the draft Plan and Policies Map as follows;

- ❖ Changes to the wording of the supporting paragraphs to further highlight the need for both campus modernisation & expansion, and for sports facilities, and to clarify the purpose of Figure 15 & the related plan;
- ❖ Changes to the Policies Map are requested to clarify the indicative locations for future campus expansion – an updated Policies Map accompanies these representations;

With the above in mind the following changes are sought to the supporting text, policy, plan and policies map relating to the modernisation and expansion of the RHS School Campus;

#### **Requested Change 1 - Paragraph 10.25**

- ❖ After 'modernisation' in line 1 add "and campus expansion,"

#### **Requested Change 2 - Paragraph 10.27**

- ❖ After 'education' in line 2 add "and sports"

#### **Requested Change 3 – Figure 15**

- ❖ Omit the text 'ideas for development' & add "locations for campus expansion"
- ❖ Figure 15 to read – "Indicative locations for campus expansion at RHS"

#### **Requested Change 4 – Policy HNP 04: Royal Hospital School (RHS)**

- ❖ In line 1 of paragraph 1 add "modernisation and" before 'expansion' in line 1;
- ❖ Line 1 of the policy to read "The principle of the modernisation and expansion of The Royal Hospital School, which would reinforce"

### **Requested Change 5 – Policies Map**

- ❖ **Modify the Policies Map to incorporate two asterisks\* on the map and in the map key to identify the indicative locations for future campus expansion at RHS**
- ❖ **An updated Policies Map accompanies these representations;**

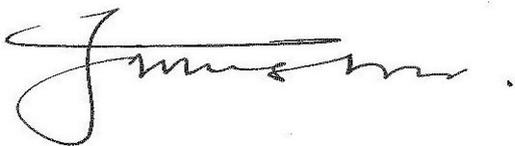
In conclusion, The School welcomes the HNP's recognition of the need for RHS to modernise and expand to remain financially viable and competitive.

By providing an appropriate planning framework to achieve the sustainable growth and conservation of the village, the HNP will deliver a balanced, vibrant and thriving community in Holbrook to 2037 and beyond.

This approach would provide The School with the planning comfort necessary to bring forward appropriate investment in new infrastructure and facilities, providing much needed energy security, and in so doing, underpinning and increasing its employment base and academic, sport and recreational offer, thereby maintaining and enhancing provision for community use and access.

We trust you concur with the rationale for the requested changes to the draft Plan and look forward to progressing these matters with you through a Statement of Common Ground, as appropriate, in order to assist the Examination process.

Yours faithfully



**James Lawson**  
**James Lawson Planning Ltd**  
Encs

## Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr James Lawson
Job Title (if applicable):	Director
Organisation / Company (if applicable):	James Lawson Planning Ltd
Address:	36 Oxley Parker Drive Colchester Essex
Postcode:	CO4 5XQ
Tel No:	07967 655680
E-mail:	<a href="mailto:james@jameslawsonplanning.co.uk">james@jameslawsonplanning.co.uk</a>

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Royal Hospital School
Address:	Holbrook Ipswich Suffolk
Postcode:	IP9 2RX
Tel No:	01473 326233
E-mail:	<a href="mailto:operations@royalhospitalschool.org">operations@royalhospitalschool.org</a>

## Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

<b>Paragraph No.</b>	10.25	<b>Policy No.</b>	
----------------------	-------	-------------------	--

**Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)**

<b>Support</b>		<b>Oppose</b>	
<b>Support with modifications</b>	X	<b>Have Comments</b>	

**Please give details of your reasons for support / opposition, or make other comments here:**

The paragraph 10.25 text referable to Policy HNP 04: Royal Hospital School is supported, however it currently omits reference to the need for 'campus expansion' which is a key component of The School's Capital Development Plan.

It is acknowledged that campus expansion is included within HNP 04 policy wording itself, however supporting paragraph 10.25 needs to be consistent with this key aim.

Please also see the RHS letter-based representation (dated 18<sup>th</sup> January 2023) which provides further planning rationale and justification for the change requested.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

After 'modernisation' in line 1 add "and campus expansion."

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the matter through the written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

Note: The decision on whether to hold a hearing is entirely at the discretion of the Examiner

**I consider that a hearing should be held because ...**

N/a

(Continue on separate sheet if necessary)

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Holbrook NP by Babergh District Council	X

**Signed: James Lawson**

**Dated: 18/1/23**

## Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

<b>Paragraph No.</b>	10.27	<b>Policy No.</b>	
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

<b>Support</b>		<b>Oppose</b>	
<b>Support with modifications</b>	X	<b>Have Comments</b>	

**Please give details of your reasons for support / opposition, or make other comments here:**

The paragraph 10.27 text referable to Policy HNP 04: Royal Hospital School is supported, however it currently omits reference to the need for 'sports facilities' which is a key component of The School's Capital Development Plan

Please also see the RHS letter-based representation (dated 18<sup>th</sup> January 2023) which provides further planning rationale and justification for the change requested.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

After 'education' in line 2 add "and sports"

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the matter through the written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

Note: The decision on whether to hold a hearing is entirely at the discretion of the Examiner

**I consider that a hearing should be held because ...**

N/a

(Continue on separate sheet if necessary)

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Holbrook NP by Babergh District Council	X

**Signed: James Lawson**

**Dated: 18/1/23**

## Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No. HNP 04: Royal Hospital School	
---------------	--	--	--

Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support		Oppose	
Support with modifications	X	Have Comments	

**Please give details of your reasons for support / opposition, or make other comments here:**

Policy HNP 04: Royal Hospital School is supported, however its wording currently omits the School's requirement for "campus modernisation" which is a key component of The School's Capital Development Plan.

In particular, it is necessary to modernise the existing 1960's structures on the site, such as the Science Block, which does not provide for a sufficiently modern standard of teaching space or specification of facilities now required by the teaching/ laboratory staff and students.

Please also see the RHS letter-based representation (dated 18<sup>th</sup> January 2023) which provides further planning rationale and justification for the change requested.

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

**In line 1 of paragraph 1 of the Policy add "modernisation and" before 'expansion'**

Paragraph 1 of the policy to read;

“The principle of the modernisation and expansion of The Royal Hospital School, which would reinforce its role as an important historic and nationally recognised academic institution, key local employer, and community facility, will be supported subject to the proposal conforming to all other relevant policy considerations”

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the matter through the written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

Note: The decision on whether to hold a hearing is entirely at the discretion of the Examiner

**I consider that a hearing should be held because ... (Hearing Requested)**

Whilst the supporting paragraphs to Policy HNP 04 clarify the need for **‘Campus modernisation and expansion’** the policy itself omits reference to **‘modernisation’** - which is a key component of the investment associated with The School’s Capital Development Plan.

In particular, it is necessary to modernise the existing 1960’s structures on the site, such as the Science Block, which does not provide for a sufficiently modern standard of teaching space or specification of facilities now required by the teaching/ laboratory staff and students.

A change is therefore requested to the wording of Policy HNP 04 to include reference to modernisation, as well as The School’s future need for expansion which is included within the Policy.

(Continue on separate sheet if necessary)

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Holbrook NP by Babergh District Council	X

**Signed: James Lawson**

**Dated: 18/1/23**

## Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

Paragraph No.		Policy No.	Policies Map
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support		Oppose	
Support with modifications	X	Have Comments	

Please give details of your reasons for support / opposition, or make other comments here:

The Policies Map which incorporates the area referable to Policy HNP 04: Royal Hospital School is supported, however its omission to identify the indicative locations for campus expansion means it lacks clarity.

Please also note that the 'Table of Contents' currently omits any reference to the 'Policies Map' which is included at the end of the document (at page 103) and prefixed by the number 17.

*(Continue on separate sheet if necessary)*

What improvements or modifications would you suggest?

**Modify the Policies Map to incorporate two asterisks\* on the map and in the map key - to identify the indicative locations for future campus expansion at RHS**

**An updated Policies Map with asterisks added accompanies these representations;**

(Continue on separate sheet if necessary)

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the matter through the written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

Note: The decision on whether to hold a hearing is entirely at the discretion of the Examiner

**I consider that a hearing should be held because ...**

N/a

(Continue on separate sheet if necessary)

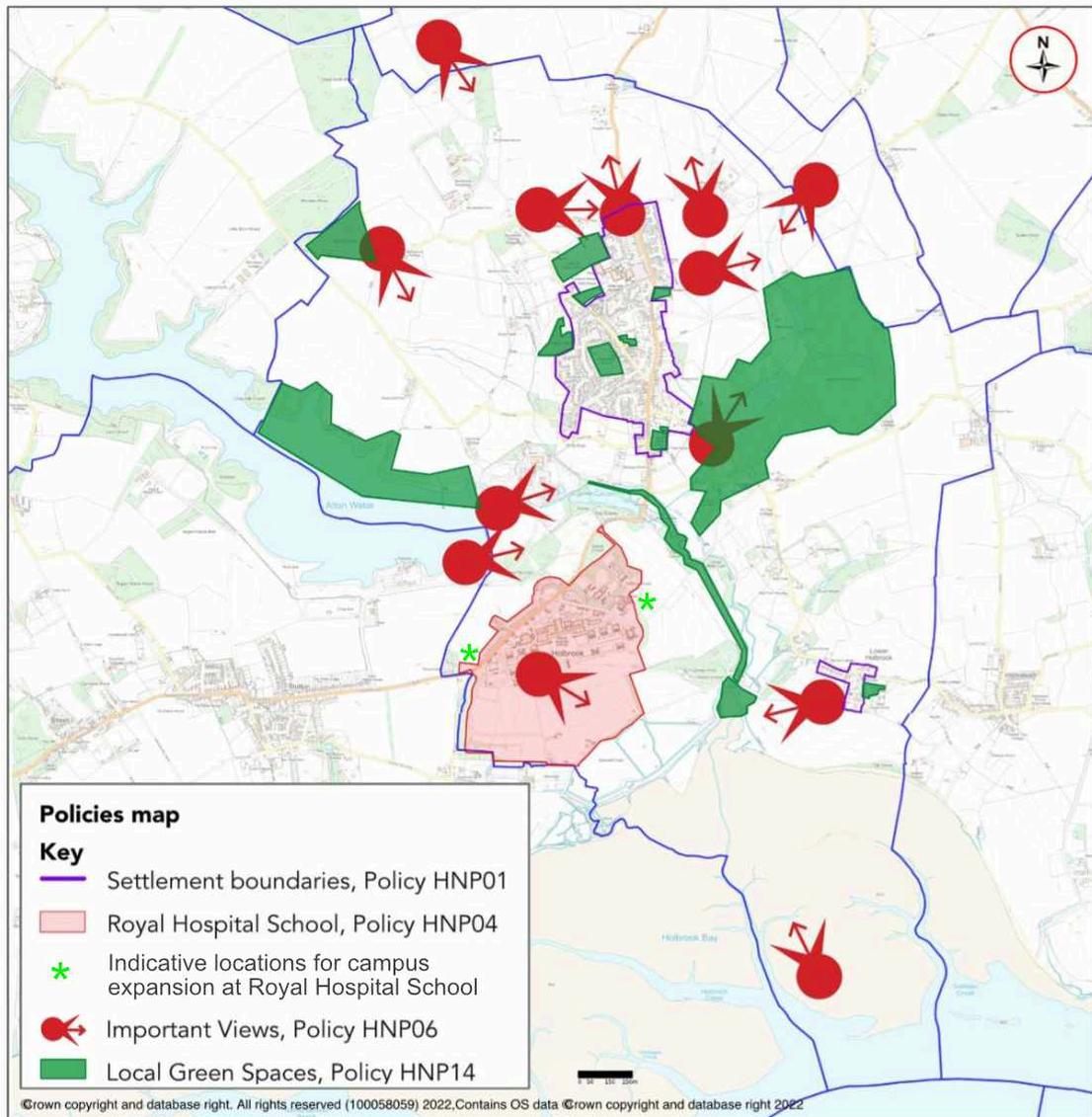
**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Holbrook NP by Babergh District Council	X

**Signed: James Lawson**

**Dated: 18/1/23**

### 17 POLICIES MAP



*[ PLEASE NOTE: THIS PAGE IS INTENTIONALLY BLANK ]*

## (11) SAVILLS, obo Mr & Miss Barker

**E from:** Lydia Voyias <LVoyias@savills.com>

**Rec'd:** 24 January 2023

**Subject:** Response to Holbrook Neighbourhood Plan Consultation ...

Dear Community Planning Team,

Please find attached representations submitted on behalf Mr G Barker and Miss E Barker.

These comprise of:

- Completed Reg 16 Neighbourhood Plan Response Form
- Reserved Matters Decision Notice for Land east of Ipswich Road, Holbrook
- Approved Site Plan for Land east of Ipswich Road, Holbrook
- Representations submitted in response to the Joint Local Plan Reg 19 consultation
  - Form
  - Reps; and
  - Access Appraisal

I would be grateful if you could please confirm receipt of these representations and keep me updated with the progress of the Neighbourhood Plan to Examination.

Many thanks

Lydia Voyias  
Associate Director  
Planning

Savills, Unex House, 132-134 Hills Road, Cambridge, CB2 8PA



# Consultation Response Form

## Holbrook Neighbourhood Plan 2022 - 2037

### Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended)

Holbrook Parish Council have prepared and submitted a Neighbourhood Plan which sets out a vision for the parish and contains policies which it intends will be used to help determine planning applications within the designated area.

The submission draft Holbrook Neighbourhood Plan and other relevant documents can be found online by going to: [www.babergh.gov.uk/HolbrookNP](http://www.babergh.gov.uk/HolbrookNP)

Printed copies of the Plan have also been deposited at the East of England Co-op Food Store, The Street, Holbrook, IP9 2PZ and are available for viewing during normal opening hours.

If you are unable to access any of these consultation documents online, please call us on 0300 123 4000 (Option 5, then Option 4) during normal office hours so that we explore ways in which we can help you.

### HOW TO SUBMIT YOUR COMMENTS

All comments (i.e., representations) on this Plan must be submitted in writing and be received by no later than 4:00pm on Wednesday 25 January 2023

- **Complete Section One** in full so that your comment(s) can be considered at the Examination stage.
- **Complete Section Two**, identifying which paragraph / policy your comments relate too. You may comment on more than one part of the Plan but make this clear. Use separate forms if necessary.
- **E-mail your comments to:** [communityplanning@babberghmidsuffolk.gov.uk](mailto:communityplanning@babberghmidsuffolk.gov.uk)
- **Post your comments to:** 'Holbrook NP Consultation,' c/o Mr P Bryant, Spatial Planning Policy Team, Babergh District Council, Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX

### It will not be possible to accept late comments

At the end of the consultation period, all comments received will be collated and then be forwarded on to the appointed Examiner. You should not assume that there will be further opportunities to introduce new information, although the Examiner may choose to seek clarity on certain matters.

Data Protection: All information collected and processed by the District Council at this stage is by virtue of our requirement under the Neighbourhood Planning (General) Regulations 2012 (as amended). All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information will be protected in accordance with the Data Protection Act 2018. For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our website or call customer services on (0300) 123 4000 and ask to speak to the Information Governance Officer.

## Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	Mr G. Barker and Miss E. Baker
Job Title (if applicable):	
Organisation / Company (if applicable):	
Address:	C/O Savills (UK) Unex House 132-134 Hills Road Cambridge
Postcode:	CB2 8PA
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Lydia Voyias Savills (UK) Ltd
Address:	Unex House 132-134 Hills Road Cambridge
Postcode:	CB2 8PA
Tel No:	01223 347 269
E-mail:	<a href="mailto:LVoyias@savills.com">LVoyias@savills.com</a>

## Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

<b>Paragraph No.</b>	6.9 to 6.19 10.5	<b>Policy No.</b>	HNP 01
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**Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)**

<b>Support</b>		<b>Oppose</b>	X
<b>Support with modifications</b>		<b>Have Comments</b>	

**Please give details of your reasons for support / opposition, or make other comments here:**

This representation has been prepared on behalf of Mr G Barker and Miss E Barker in respect of land that has been promoted for residential development and given the reference Site 1 within the Neighbourhood Plan 'Site Options Assessment Report' (AECOM, Dec 2019).

This objection is submitted in respect of two areas:

- Assessment of Sites Options
- Consideration Housing Need

### Basic Conditions and Preparation of a Neighbourhood Plan

For a Neighbourhood Plan to proceed to a referendum, the Localism Act requires the appointed Examiner to consider whether it meets the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the national Planning Practice Guidance (PPG).

The basic conditions are:

- “(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).*
- (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. This applies only to Orders.*
- (c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.*
- (d) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.*
- (e) The making of the order (or neighbourhood 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).*
- (f) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
- (g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”*

It is noted that the National Planning Policy Framework states at paragraph 13 that: *“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”*

The PPG adds at paragraph 040 (Reference ID 41-040-20160211) that *“...proportionate, robust evidence should support the choices made and the approach taken”* by a Neighbourhood Plan and in respect of their preparation, states that: *“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.”* [Reference ID: 41-041-20140306].

The PPG also advises that those responsible for a Neighbourhood Plan, i.e. the qualifying body, must demonstrate how the draft Neighbourhood Plan will contribute towards sustainable development, being underpinned by *“proportionate evidence...on how the draft neighbourhood plan or order guides development to sustainable solutions”* (paragraph 072 Reference ID: 41-072-20190509).

This guidance is relevant to the following specific comments.

### **Assessment of Site Options**

Paragraph 6.9 of the Neighbourhood Plan explains that the emerging Babergh Mid Suffolk Joint Local Plan Policy SP04 requires Neighbourhood Plans to plan to deliver the housing requirements set for each Neighbourhood Plan Area. Paragraph 6.9 states: *“The policy states that Holbrook has a requirement of 68 dwellings.”*

In identifying the requirement as 68 dwellings, paragraph 9.11 of the Babergh Mid Suffolk Joint Local Plan Policy clarifies that Babergh Council considered *“outstanding planning permissions granted as of 1<sup>st</sup> April 2018. If outstanding planning permissions granted as of 1<sup>st</sup> April 2018 expire during the lifetime of the Plan, then the corresponding offset number of dwellings, will need to be identified within the same Neighbourhood Plan area to meet the total homes requirement.”*

Paragraph 6.11 of the Neighbourhood Plan states *“Given that the housing requirement has already been met through recently completed development, sites with planning permission and a proposed allocation for 7 dwellings in the JLP, there is no requirement to allocate additional sites in the Neighbourhood Plan for housing. However, it was felt to be important to ensure that all options were explored.”* (emphasis added).

To clarify the allocation for 7 dwellings relates to ‘LA068 – Allocation: Land east of Ipswich Road, Holbrook’. This site already benefits from both outline planning permission (LPA Ref: DC/18/05228) and subsequent reserved matters approval (LPA Ref: DC/22/00289). The Reserved Matters approval specifies approval for the Site Plan Reference: TH52/02 Rev F - Received 14/04/2022. This plan incorporates an access to the site to serve the 7 plots. However it is noted that a minor access road with a 5.5m wide carriageway and two 1.8m wide footways would be suitable to serve the site and accommodate the movement requirements of up to 100 dwellings in a cul-de-sac form. It is agreed between the parties, Thorcross Builders Ltd and the Landowners, that this access could be used to facilitate vehicular access to the land to the east (Site 1). This proposal has been submitted to Babergh for consideration as part of previous Call for Sites. Local Plan representations submitted on behalf of Thorcross Builders Ltd have also been submitted to promote the site on this basis and are appended for ease of reference.

The landowners maintain that access through 'Land east of Ipswich Road, Holbrook' can facilitate access to the larger land entity to the east (Site 1). There is no evidence to demonstrate that access can not be provided to the site. It is requested that this proposal is reconsidered and assessed as an alternative option for housing allocation within the Neighbourhood Plan.

In assessing the sites for consideration within the emerging Neighbourhood Plan, it is explained at paragraph 6.12 of the Neighbourhood Plan that:

*"6.12 Eight sites were identified in total for the site assessment. This included seven sites identified in the Neighbourhood Plan Call for Sites and one site from the District Council Call for Sites. Three of the sites submitted through the Neighbourhood Plan sites had already been submitted to the BMSDC Strategic Housing and Land Availability Assessment (SHELAA). All sites are available as they have all either been submitted to a Local Authority or neighbourhood level Call for Sites. One site in Holbrook (SS0717) was included with a revised site boundary in the 2019 SHELAA and this already has planning permission, therefore was not included in the assessment."*

It is stated at paragraph 6.14 that *"All other sites were rated red by AECOM and therefore deemed unsuitable for residential housing development."*

When considering the 'Site Options Assessment Report' (AECOM Dec 2019):

<https://www.babergh.gov.uk/assets/Neighbourhood-Planning/Holbrook-NP-Site-Options-Assessment.pdf> The site, Land to the East of Ipswich Road, Holbrook has been assessed under the reference Site 1.

Page 33 of the AECOM Site Options Assessment Report states the Babergh Mid Suffolk Strategic Housing Land Availability Assessment concluded that:

*"The site is potentially considered suitable for residential development, taking identified constraints into consideration. However only part development (western aspect of site) is recommended in order to avoid disproportionate development to the existing settlement"*.

AECOM then assessed the site on the basis of a capacity of 30 dwellings, the conclusion at page 42 states:

This greenfield site is adjacent to both the built-up area and the settlement boundary. The site is in close proximity to the centre of the village and a number of services and facilities, it is less than a 10-minute walk to a shop, primary school, secondary school, bus stop and open space.

There is pedestrian access to the site currently and there is potential to create vehicular access through the site that is allocated in the Local Plan, ref LA068. There is also a permission on this allocated site for 7 dwellings, in the design proposals space has been left to create access to site 1 which falls behind it. However, without construction of LA068 there is no possible vehicle access.

The Beeches Grade II Listed Building is in relatively close proximity to the site but is not considered to be a major constraint.

Holbrook in general has an extensive network of PRoW and there is one located within the site boundary. The site is almost adjacent to the AONB, falls within the Additional Project Area, contains an area of woodland that is considered a priority habitat and is in the Stour Estuary SSSI Impact Risk Zone. In addition, the land is classed as best quality agricultural land. All these environmental constraints would require mitigation. The site falls within the Estates Farmland Landscape Character Type which is predominantly an arable landscape, with distinctive field patterns delineated by significant hedgerows, pockets of ancient woodland and windy lanes. The landscape is generally quite open with views across the estuaries. This site is well screened on all four sides some gaps allowing views on the AONB, there is also some visibility from neighbouring properties. It is likely that the site will be considered to have high landscape sensitivity and low visual sensitivity, however the specialist landscape assessment is outstanding.

The site is compliant with Core Strategy Policy CS11 as it is adjacent to the built-up area, is well related to services and facilities and would not constitute ribbon development. The site is not compliant with emerging Joint Local Plan Policy SP03 as it is located adjacent to but not within the settlement boundary and the policy states that these boundaries demonstrate the extent of land which is required to meet the development needs of the Plan. While this draft policy is not yet adopted it must be given material consideration.

This site would not be suitable for development unless there was evidence of an additional housing need or partially considered as a reserve site or included as a rural exception policy.

It is noted that the AECOM Site Options Assessment states that “*a specialist landscape assessment is outstanding*”. The Neighbourhood Plan is not supported by any evidence that incorporates a site specific specialist landscape assessment of the proposal. We note the Landscape Assessment Report (March 2020) but this does not fulfil this function.

The Planning Practice Guidance advises in respect of housing and economic land availability assessment:

*Can the assessment be constrained by the need for development?*

*The assessment needs to identify all sites and broad locations (regardless of the amount of development needed) in order to provide a complete audit of available land. The process of the assessment will, however, provide the information to enable an identification of sites and locations that are most suitable for the level of development required.*

(Source: Paragraph: 008 Reference ID: 3-008-20190722 - Revision date: 22 07 2019)

**Objection is raised to AECOM's conclusion that "*the site would not be suitable for development*".** In reaching its conclusion, AECOM has not considered the potential of development at the site in isolation, instead it has incorporated consideration of emerging policy. As a consequence of this approach, it has subsequently lead the Neighbourhood Plan Group to make the statement at paragraph 6.14 of the Neighbourhood Plan that "*All other sites were rated red by AECOM and therefore deemed unsuitable for residential housing development*" which we consider to be incorrect.

Paragraph 6.19 of the Neighbourhood Plan states the following:

*"Site 1: This greenfield site is adjacent to both the built-up area and the settlement boundary. The site is in close proximity to the centre of the village and a number of services and facilities, it is less than a 10-minute walk to a shop, primary school, secondary school, bus stop and open space. However, it is not compliant with JLP policy SP03 and there is no clear access point."*

Objection is raised to the summary at paragraph 6.19 of the Neighbourhood Plan. It is reiterated that there is opportunity to secure access via adjacent land and can connect to Ipswich Road. It is therefore our position that the site is suitable for development.

The justification for Policy HNP01 is provided at paragraph 10.5 of the Neighbourhood Plan. It states that "*The focus for any new development sites will be consistent with the recommendations from AECOM [4], the BMSDC Joint Local Plan [2], and the wishes of the Parishioners of Holbrook [6]: they should be small scale infill developments enclosed within the Settlement Boundary.*"

Clearly, we raise objection to elements of the AECOM report in so far as it has concluded that Site 1 is not suitable for development and therefore we object to its inclusion within paragraph 10.5 as this report should not unnecessarily restrict development at suitable sites.

### **Assessment of Housing Need**

The Neighbourhood Plan does not propose to make any specific allocations for housing at Holbrook in the period to 2037. As a consequence, the Neighbourhood Plan will frustrate key objectives of the NPPF to significantly boost the supply of housing and 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.

It should be noted that Holbrook is identified as a 'Core Village' within the emerging Joint which are intended to act "*as a focus for development*". It is our position that additional housing should be directed to the settlement. Particularly as a low housing requirement has been identified for the settlement when compared to villages of similar size, for example Capel St Mary (792 dwellings). Copies of previously submitted representations on behalf of Thorcross Builders Ltd to the Joint Local Plan are appended to this submission.

The Basic Conditions Statement states that "*Policy HNP01 Housing Development sets out the strategy for future housing in the parish commensurate with its position in the settlement hierarchy.*" It is questioned how can no housing allocations until 2037 at a Core Village be commensurate with its position in the settlement hierarchy.

It is for the Neighbourhood Plan Group to consider whether they wish to allocate sites over and above the figures provided by Babergh and Mid Suffolk, where there is a demonstrated need (as stated within the Planning Practice Guidance: Paragraph: 044 Reference ID: 41-044-20190509).

It is our position that the AECOM Holbrook Parish Housing Needs Assessment (2020) (HNA) should incorporate a separate discussion to the site assessment to consider whether there is a need for additional housing at this time.

It is stated at paragraph 50 of the HNA that “...*Within the emerging Local Plan the minimum housing requirement for each NP is provided, which include outstanding planning permissions granted as 1<sup>st</sup> April 2018. The figure provided for Holbrook is 68 dwellings over the plan period. Therefore this report will not look at the quantify of housing required within Holbrook.*” As a result it is clear that the Neighbourhood Plan evidence base does not include any assessment of housing need itself.

The need figure that the Neighbourhood Plan has been working to, 68 dwellings, was provided by Babergh Council and reflects what is stated within the emerging Local Plan. As an aside, it should be noted that relevant representations have been submitted to the Babergh Mid Suffolk Local Plan Examination to promote additional land for allocation within the emerging Local Plan.

It should also be noted that the Babergh Mid Suffolk Local Plan Examination reached an interim position in December 2021 where the Inspectors met with the Councils to discuss a way forward to progress the examination. It was agreed that additional evidence would be submitted alongside a range of proposed modifications. However in the subsequent letter from the Inspectors dated 28<sup>th</sup> April 2022, it is identified that “...*the necessary work has taken the Councils longer than... originally anticipated*”.

The latest letter from the Inspectors dated 16<sup>th</sup> September 2022 states “...*We have previously indicated that we do not propose to set any formal deadlines for submission of the work to us; it is the Councils’ plan and that the work on the proposed modifications is comprehensive and of a high quality is ultimately more important than the date on which it is received. Nevertheless, as the examination reaches its two year point the potential for its supporting evidence to become outdated inevitably becomes increasing likely...*” ([Letter - Sep 2022.pdf \(midsuffolk.gov.uk\)](#))

As a consequence of the significant delay to the progression of the Local Plan Examination there is potential for the original assumptions regarding the amount of housing need across Babergh and Mid Suffolk to be modified, as well as the housing need at Holbrook to change.

There are no set timescales provided by Babergh and Mid Suffolk to understand what the modifications to the emerging Local Plan will be. It is therefore questioned whether the Neighbourhood Plan should be planning for additional housing and whether its evidence base should be updated to consider this.

### **What improvements or modifications would you suggest?**

For the reasons stated above, the Neighbourhood Plan evidence base should be updated to assess whether sites submitted for consideration for residential allocation are suitable for development in isolation.

For the reasons stated above, consideration as to whether the Neighbourhood Plan Group wanted to plan for additional housing should have taken place subsequently to the assessment of the sites suitability.

For the reasons stated above, the Neighbourhood Plan should be updated to delete reference at paragraph 6.14 that “*All other sites were rated red by AECOM and therefore deemed unsuitable for residential housing development.*”

For the reasons stated above, the Neighbourhood Plan should update paragraph 6.19 to reflect

that access can be secured to the site (Site 1) through adjacent land 'Land to the East of Ipswich Road, Holbrook'.

For the reasons stated above, Site 1 should be considered for residential allocation within the Neighbourhood Plan.

For the reasons stated above, reference to the AECOM Site Assessment Report should be removed from paragraph 10.5 of the Neighbourhood Plan as it is felt that it should not unnecessarily restrict development at suitable sites.

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the matter through the written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

Note: The decision on whether to hold a hearing is entirely at the discretion of the Examiner

**I consider that a hearing should be held because ...**

If it is considered that a hearing should be arranged in respect of the Neighbourhood Plan Examination, we would welcome the opportunity to participate to expand on the points raised within these representations.

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	X
The final 'making' (adoption) of the Holbrook NP by Babergh District Council	X

**Signed: Lydia Voyias**

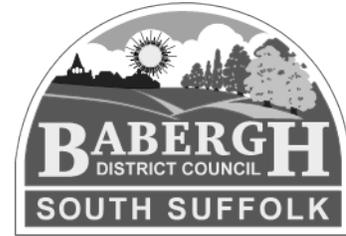
**Dated:24.01.2023**

**Philip Isbell – Chief Planning Officer**  
**Sustainable Communities**

**Babergh District Council**

Endeavour House, 8 Russell Road, Ipswich IP1 2BX

Website: [www.babergh.gov.uk](http://www.babergh.gov.uk)



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**APPROVAL OF RESERVED MATTERS**

**TOWN AND COUNTRY PLANNING ACT 1990**

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND)  
ORDER 2015**

---

**Correspondence Address:**

Springfields Planning And Development  
15 Springfields  
Great Dunmow  
CM6 1BP  
United Kingdom

**Applicant:**

Thorcross Builders Limited  
C/o Agent  
  
C/o Agent

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**Date Application Received:** 18-Jan-22

**Application Reference:** DC/22/00289

**Date Registered:** 19-Jan-22

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**Proposal & Location of Development:**

Application for approval of Reserved Matters pursuant to Outline Planning Permission DC/18/05228 dated: 23/01/19 - Appearance, Landscaping, Layout and Scale for Erection of 7 No. dwellings (comprising 2No. 2 bed houses, 3No. 3 bed houses and 2No. 3 bed chalet bungalows) served via new access from Ipswich Road.

Land East Of , Ipswich Road, Holbrook, IP9 2QT

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**Section A – Plans & Documents:**

This decision refers to drawing no./entitled Site Location Plan TH52/01A received 18/01/2022 as the defined red line plan with the site shown edged red. Any other drawing showing land edged red whether as part of another document or as a separate plan/drawing has not been accepted or treated as the defined application site for the purposes of this decision.

The plans and documents recorded below are those upon which this decision has been reached:

Defined Red Line Plan Site Location Plan TH52/01A - Received 18/01/2022

Existing Site Plan TH52/04 - Received 18/01/2022

Proposed Plans and Elevations TH52/15A - Received 18/01/2022

Proposed Plans and Elevations TH52-11 A - Received 22/03/2022

Street Scene - Proposed TH52/05 A - Received 22/03/2022

Proposed Plans and Elevations TH52-10 A - Received 22/03/2022

Proposed Plans and Elevations TH52/14 C - Received 14/04/2022

Proposed Site Plan TH52/02 F - Received 14/04/2022

Proposed Plans and Elevations TH52/12 A - Received 22/03/2022

Proposed Plans and Elevations TH52-13 A - Received 22/03/2022

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**Section B:**

Babergh District Council as Local Planning Authority, hereby give notice that **RESERVED MATTERS HAVE BEEN APPROVED** in accordance with the application particulars and plans listed in section A subject to the following conditions:

1. APPROVED PLANS & DOCUMENTS

The development hereby permitted shall be carried out in accordance with the drawings/documents listed under Section A above and/or such other drawings/documents as may be approved by the Local Planning Authority in writing pursuant to other conditions of this permission or such drawings/documents as may subsequently be approved in writing by the Local Planning Authority as a non-material amendment following an application in that regard. Such development hereby permitted shall be carried out in accordance with any Phasing Plan approved under Section A, or as necessary in accordance with any successive Phasing Plan as may subsequently be approved in writing by the Local Planning Authority prior to the commencement of development pursuant to this condition.

Reason - For the avoidance of doubt and in the interests of proper phased planning of the development.

**SUMMARY OF POLICIES WHICH ARE RELEVANT TO THE DECISION:**

CS01 - Applying the presumption in Favour of Sustainable Development in Babergh  
CS02 - Settlement Pattern Policy  
CS03 - Strategy for Growth and Development  
CS11 - Core and Hinterland Villages  
CS15 - Implementing Sustainable Development  
CN01 - Design Standards  
TP15 - Parking Standards - New Development

**NOTES:**

1. **Statement of positive and proactive working in line with the National Planning Policy Framework (NPPF)**

The proposal has been assessed with regard to adopted development plan policies, the National Planning Policy Framework and all other material considerations. The NPPF encourages a positive and proactive approach to decision taking, delivery of sustainable development, achievement of high quality development and working proactively to secure developments that improve the economic, social and environmental conditions of the area. While the applicant did not take advantage of the service, the Council provides a pre-application advice service prior to the submission of any application. The opportunity to discuss a proposal prior to making an application allows potential issues to be raised and addressed pro-actively at an early stage, potentially allowing the Council to make a favourable determination for a greater proportion of applications than if no such service was available.

2. The granting of planning permission is separate to any consents that may be required in relation to Public Rights of Way, including the authorisation of gates. These consents are to be obtained from the Public Rights of Way & Access Team at Suffolk County Council, as the Highway Authority.

To apply to carry out work on the Public Right of Way or seek a temporary closure, visit <http://www.suffolkpublicrightsofway.org.uk/home/temporary-closure-of-a-public-right-of-way> or telephone 0345 606 6071.

To apply for structures, such as gates, on a Public Rights of Way, visit <http://www.suffolkpublicrightsofway.org.uk/home/land-manager-information/> or telephone 0345 6066071.

Babergh and Mid Suffolk District Councils have adopted Community Infrastructure Levy (CIL) charging which affects planning permissions granted on or after 11th April 2016 and permitted development commenced on or after 11th April 2016. If your development is for the erection of a new building, annex or extension or the change of use of a building over 100sqm in internal area or the creation of a new dwelling or holiday let of any size your development may be liable to pay CIL and you must submit relevant documents to our Infrastructure Team telling us more about your development, who will pay CIL and when the development will start. You will receive advice on the amount you have to pay and what you have to do and you can find more information about CIL on our websites here:

[CIL in Babergh](#) and [CIL in Mid Suffolk](#) or by contacting the Infrastructure Team on: [infrastructure@baberghmidsuffolk.gov.uk](mailto:infrastructure@baberghmidsuffolk.gov.uk)

This relates to document reference: DC/22/00289

**Signed: Philip Isbell**

**Dated: 21st April 2022**

**Chief Planning Officer  
Sustainable Communities**

## **Important Notes to be read in conjunction with your Decision Notice**

### **Please read carefully**

This decision notice refers only to the decision made by the Local Planning Authority under the Town and Country Planning Acts and DOES NOT include any other consent or approval required under enactment, bylaw, order or regulation.

**Please note: depending upon what conditions have been attached to the decision, action may be required on your part before you can begin your development.** Planning conditions usually require that you write to the Local Planning Authority and obtain confirmation that you have discharged your obligations. You should read your decision notice in detail and make a note of the requirements placed on you by any conditions. **If you proceed with your development without complying with these conditions you may invalidate your permission and put your development at risk.**

### **Discharging your obligations under a condition:**

You should formally apply to discharge your conditions and the relevant application forms are available on the Council's website. The Local Planning Authority has 8 weeks to write to you after you submit the details to discharge your conditions. You should always account for this time in your schedule as the Local Planning Authority cannot guarantee that conditions can be discharged quicker than this. A fee is applicable for the discharge of planning conditions.

### **Building Control:**

You are reminded that the carrying out of building works requires approval under the Building Regulations in many cases as well as a grant of planning permission. If you are in doubt as to whether or not the work, the subject of this planning permission, requires such approval, then you are invited to contact the Building Control Section of Babergh and Mid Suffolk District Councils.

## Appeals to the Secretary of State

1. If the applicant is aggrieved by the decision of the Local Planning Authority to refuse permission or consent, or to grant permission or consent subject to condition, they may appeal to the Secretary of State for Communities and Local Government. The applicant's right of appeal is in accordance with the appropriate statutory provisions which follow:

Planning Applications: Section 78 Town and Country Planning Act 1990

Listed Building Applications: Section 20 Planning (Listed Buildings and Conservation Areas) Act 1990

Advertisement Applications: Section 78 Town and Country Planning Act 1990  
Regulation 15

Town and Country Planning (Control of Advertisements) Regulations 2007

Notice of appeal in the case of applications for advertisement consent must be served within eight weeks of receipt of this notice. Notice of Householder and Minor Commercial Appeals must be served within 12 weeks, in all other cases, notice of appeal must be served within six months of this notice. If this is a decision on a planning application relating to the same or substantially the same land and development as is already the subject of an enforcement notice, if you want to appeal against your local planning authority's decision on your application, then you must do so within 28 days of the date of this notice. If an enforcement notice is served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within: 28 days of the date of service of the enforcement notice, or within six months of the date of this notice, whichever period expires earlier.

Appeals must be made on a form which is obtainable from The Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay, Bristol, BS1 6PN or online at <https://www.gov.uk/government/publications/modelnotification-notice-to-be-sent-to-an-applicant-when-permission-is-refused>

The Secretary of State has power to allow a longer period for the giving of a notice of appeal but he/she will not normally be prepared to exercise this power unless there are special circumstances which excuse the delay in giving notice of appeal. The Secretary of State is not required to entertain an appeal if it appears to him/her that permission for the proposed development could not have been granted by the Local Planning Authority, or could not have been so granted otherwise than subject to the conditions imposed by it, having regard to the statutory requirements\*, to the provisions of the Development Order, and to any directions given under the Order. The Secretary of State does not in practice refuse to entertain appeals solely because the decision of the Local Planning Authority was based on a direction given by him/her.

2. If permission or consent to develop land or carry out works is refused or granted subject to conditions, whether by the Local Planning Authority or by the Secretary of State and the owner of the land claims that the land has become incapable of reasonable beneficial use by the carrying out of any development or works which has been or would be permitted they may serve on the Council of the district in which the land is situated, a purchase notice requiring the Council to purchase his interest in the land in accordance with the provisions of Section 137 of the Town and Country Planning Act 1990 or Section 32 Planning (Listed Buildings and Conservation Areas) Act 1990.

\*The statutory requirements are those set out in Section 79(6) of the Town and Country Planning Act 1990, namely Sections 70 and 72(1) of the Act.



- KEY**
- Existing surveyed ground levels
  - Proposed ground levels adjacent to new dwellings
  - Proposed dwellings - 1 1/2 storey fronting Ipswich Road
  - Proposed Garages
  - Proposed access road - Permeable Asphalt
  - Proposed 1.800m footpath - Permeable Asphalt
  - Proposed access and parking driveways - Permeable Resin Bonded Shingle
  - Proposed paths and parking driveways - Permeable Block Paving
  - Grassed and landscape areas
  - 1.800m high soft red facing brick feature wall - bricks to match proposed dwellings
  - 1.200m high Parkland Fencing
  - 1.800m high SW timber ledged and braced gate - Painted dark grey. Fencing adjacent to gates to be 1.80m high close boarded panels - colour to match gates
  - Existing hedge planting - To be retained
  - New 1.00m / 1.20m high hornbeam hedge planting (Carpinus Betulus)
  - New "Heavy Standard" Tree planting - Random mix of the following species  
Snake Bark Maple (Acer Capillipes)  
Purple Norway Maple (Acer Platanoides 'Crimson Sentry')  
Silver Birch (Betula Pendula)
  - Mixed shrub planting
  - Electric car charging point located adjacent to each new dwelling
  - Min. 900mm wide Indian Sandstone paved footpaths
  - Indian Sandstone paved patio

**FIG 1 - Parkland fencing**



Existing hedge planting along boundary to be retained

**FIG 2 - Woven willow fencing**

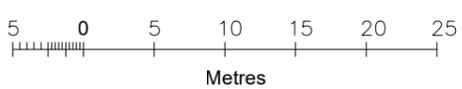


1.800m High woven willow fence between gardens and Public Footpath area (see FIG 2). Hedgehog gaps to be incorporated into the base of fence panels

Route of existing Public Footpath - Shown dashed

- 1.200m high Parkland fencing See FIG 1
- New 1.800m wide footpath along site frontage
- New "Heavy Standard" tree planting - Refer to Key for details of proposed species
- Parkland fencing to reduce in height to 0.600m within junction inter-visibility zone
- Paved area provided for collection of refuse/recycling bins for plots 1, 2, 3 & 6
- Proposed New Highway Access in accordance with drawing TH52/03A, approved under Outline Planning Permission DC/18/05228 - Conditions 7, 8 and 9
- Paved area provided for collection of refuse/recycling bins for plots 4, 5 & 7
- Blue hatched area indicates extent of junction inter-visibility zone. Proposed planting and fence shall not exceed 600mm above the level of the adjacent carriageway/highway for a distance of 25m in each direction
- New 1.800m wide footpath along site frontage
- 1.200m high Parkland fencing See FIG 1
- New "Heavy Standard" tree planting - Refer to Key for species

**VISIBILITY SPAY TANGENTIAL TO CHANNEL LINE OF IPSWICH ROAD**



- REV F - Plot 7 footprint handed and re-positioned 2m further forward. Minor revisions to FFL's - Apr. 2022
- REV E - Plot 1,2,3,4 & 5 ridge levels and adjacent proposed ground levels reduced and junction inter-visibility zone added - Mar. 2022
- REV D - Refuse/recycling bins collection positions added to site plan - Jan. 2022
- REV C - Photographs added - Jan. 2022
- REV B - Additional information for reserved matters application - Dec. 2021
- REV A - 2no. Visitor Parking Spaces added to Site Plan - Oct. 2018

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Job title  
**PROPOSED RESIDENTIAL DEVELOPMENT  
LAND EAST OF IPSWICH ROAD  
HOLBROOK, IP9 2QT**

Client  
**THORCROSS BUILDERS LTD**

Dwg title  
**PROPOSED SITE PLAN**

**PLANBUILD Services**  
Mulberry, Hadleigh Road  
East Bergholt, Colchester  
Essex, CO7 6QT  
Tel: 01206 299493  
Email: ag.homes@btconnect.com

Drawn JAN. 2018  
Scale 1 : 250 @ A1

Drawing number  
**TH52/02<sup>F</sup>**





## **Babergh Mid Suffolk Joint Local Plan 2018-2037**

### **Pre-Submission Regulation 19**

### **Paper Representations Form**

Pre-Submission Regulation 19 stage of Babergh Mid Suffolk Joint Local Plan public representations period runs from 12<sup>th</sup> November 2020 to 24<sup>th</sup> December 2020 (6 weeks).

Regulation 19 - Town and Country Planning (Local Planning) (England) Regulations 2012

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**Representations must be received no later than 12 noon on 24<sup>th</sup> December 2020.**

Online facilities are available to draft and submit comments electronically.

Alternatively, please completed this form and return via email:

**localplan@baberghmidsuffolk.gov.uk** or post to **Babergh & Mid Suffolk Councils, Planning Policy Team, Endeavour House, 8 Russell Road, Ipswich IP1 2BX.**

If assistance is required, please contact the Council's Strategic Planning Policy Team via email address stated above or by telephone on 0300 1234 000 option 5, then 4.

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This form has two parts: Part A for personal details and Part B for your representation.

**Please make clear what part of the Joint Local Plan you are responding to and complete a separate form for each representation you wish to make.**

Please note each representation must be signed and dated.

All comments received will be made publicly available and may be identifiable by name / organisation. All other personal information provided will be protected in accordance with the Data Protection Act 2018.

## Part A

### Section 1: Personal Details

<b>Title:</b>	Mr
<b>First Name:</b>	Roger
<b>Last Name:</b>	Goodwin
<b>Job Title (where relevant):</b>	Director
<b>Organisation (where relevant):</b>	Thorcross Builders Limited
<b>Address:</b>	c/o agent
<b>Postcode:</b>	c/o agent
<b>Telephone:</b>	c/o agent
<b>Email:</b>	c/o agent

### Section 2: Agent Details (if applicable)

Please supply the details below of any agent you have working on your behalf.

<b>Agent name:</b>	Springfields Planning and Development (FAO Mr Christopher Loon)
<b>Address:</b>	15 Springfields Great Dunmow Essex
<b>Postcode:</b>	CM6 1BP
<b>Telephone number:</b>	01371 872727
<b>Email:</b>	chrisloon@springfieldspd.co.uk

## Part B

Please fill in a separate form for each representation

The Joint Local Plan will be examined by an independent inspector in order to assess whether the plan has been prepared in accordance with the legal and procedural requirements, and whether it is sound.

### Section 3: Section of Joint Local Plan

<b>Name or Organisation:</b>	<b>Springfields Planning and Development</b>
<b>Client: (if relevant)</b>	Thorcross Builders Limited
<b>To which part of the Joint Local Plan does this representation relate?</b>	
<b>Section and Paragraph:</b>	Table 2 - Babergh Settlement Hierarchy
<b>Policy:</b>	Policy SP03
<b>Policies Map:</b>	

### Section 4: Legal Compliance & Duty to Cooperate

Do you consider the Joint Local Plan is: (tick as appropriate)			
		Yes (Support)	No (Object)
<b>1. Legally and procedurally compliant:</b>			
<b>2. Sound:</b>	<b>(a) Positively prepared</b>		
	<b>(b) Justified</b>		X
	<b>(c) Effective</b>		
	<b>(d) Consistent with national policy</b>		X
<b>3. In Compliance with the Duty to Cooperate</b>			

## Section 5: Details of Representation

**If you wish to support or object to the legal compliance or soundness of the Joint Local Plan or with the Duty to Cooperate, please use this box to set out and explain your comments. Please be as precise as possible, and provide a 100 word summary of each point.**

Full Details of our Representation are set out in the appended document, *Representations On Behalf Of Thorcross Builders Limited - Land East Of Ipswich Road, Holbrook, December 2020*

Plans must pass the four tests of Soundness set out at paragraph 35 of the NPPF. In this case, Table 2 (Babergh Settlement Hierarchy) of Policy SP03 does not pass two of the four tests as it is neither:

‘Justified’ (ie not an appropriate strategy, taking into account the reasonable Alternatives)

nor

‘Complaint with National Policy’ (ie does not enable the delivery of sustainable development in accordance with the policies in the NPPF).

The reasons for this are:

- It is not clear why 18 points is the required threshold in the Settlement Hierarchy Review (SHR) for determining Core Village status at Policy SP03. Several Core Villages only just scrape this score
- The point scoring regime in the SHR Matrix is somewhat arbitrary and not fully explained
- The way in which the SHR scoring system works appears to include some elements of double counting (ie the 5km distance criteria to strategic employment and towns/urban areas). Points are awarded in the SHR to doctor’s surgeries or pharmacies but not both. The methodology has the effect of unfairly skewing scores towards particular villages
- 5 more Core Villages for Babergh are introduced in the Reg 19 JLP Consultation, increasing the number of Core Villages by 50% from the adopted Babergh Core Strategy. This may have a longer term negative impact on the vitality/viability of existing Core Villages due to more thinly spread housing allocations between them. This is particularly apparent in the case of Holbrook’s proposed allocation of only 7 dwellings.
- 4 of newly declared Core Villages proposed in the Reg19 JLP at Acton, Brantham, Shotley Street and Sproughton just meet or narrowly exceed the arbitrary 18 point threshold and their inclusion as Core Villages should be critically reviewed
- The newly proposed Core Village of Shotley Street has been scored incorrectly under the SHR Matrix and as a result falls under the 18 point threshold for inclusion as a Core Village and should be removed from Core Village status

- Spoughton, Acton and Brantham are all marginal candidates regarding a Core Village status.
- Holbrook has been under-scored in the SHR Matrix, as it has not been awarded points for its Secondary Education facility, this being the only such facility on the Shotley Peninsula. Its score should be on a par with, or at least very similar to, Capel St Mary, another Core Village which is proposed in the Reg 19 JLP to deliver *substantial* housing allocations, whereas Holbrook would receive virtually new net growth (after existing planning consents are taken into account)
- The upshot of all of the above is a negative effect on the long term viability of Holbrook services and facilities, and its ability to deliver housing and affordable housing.

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

## Section 6: Proposed Modifications to the Joint Local Plan

**Please set out what modification(s) you consider necessary to make the Joint Local Plan legally compliant or sound, having regard to the test(s) you have identified above where this relates to soundness.** (NB Please note that any non-compliance with the Duty to Cooperate is incapable of modification at examination) You will need to say why this modification will make the Joint Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**The council's SHR should be updated to take account of these representations, allowing a truer status of certain villages and small settlements to be understood under Policy SP03 and categorised at Table 2. This may in turn ensure a more appropriate housing allocation in the respective settlements under Policy SP04 as part of the JLP's housing distribution strategy. See separate representations concerning Policy SP04.**

**Shotley Street should be removed as a Core Village and downgraded to a Hinterland Village at Table 2. It does not have the facilities to achieve such status and this allows it to be given a larger housing allocation than should otherwise be the case if it becomes a Hinterland Village. Shotley Street lies on the Shotley Peninsula in a less sustainable location than Holbrook (Core Village) but is proposed to receive a 50 dwelling allocation whereas Holbrook receives 7 dwellings. The facilities in Holbrook may suffer in the long term if they are not kept viable through use, partly assisted by new housing allocations which would also address housing needs and affordable housing in Holbrook.**

**Some or all of Shotley Street's 50 unit allocation should be removed and directed towards the**

**more sustainable location of Land east of Ipswich Road, Holbrook (subject of related representations). This would be a more sustainable approach in line with the NPPF and a more appropriate option, giving a remedy to the Plan’s lack of soundness. See separate representations to Shotley Street.**

(Continue on a separate sheet if necessary. Please remember to include on any separate sheets the name/organisation and details of which section, paragraph, policy or element of the policies map your representation relates)

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not be a subsequent opportunity to make further representations based on the original representation at publication stage.

After the representations period of the Pre submission Babergh and Mid Suffolk Joint Local Plan has closed, further submissions will only be at the request/invitation of the Inspector, based on the matters and issues debated at the examination.

### Section 7: Participation at the Examination

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination? (please select one answer with a tick)	
Yes, I wish to participate at the oral examination	<b>X</b>
No, I do not wish to participate at the oral examination	
If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:	
<p><b>To discuss the numerous detailed points subject of these representations and to answer any queries the Inspector has regarding suggested amendments to the Plan which are required to make it sound</b></p>	

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

### Section 8: Being Kept Informed

Would you like to be kept informed of the progress of the Babergh and Mid Suffolk Joint Local Plan through to adoption? (please select one answer with a tick)	
Yes, I want to be kept informed	<b>X</b>
No, I do not want to be kept informed	

**Please note** that if you do not wish to be kept informed of the progress of the Babergh and Mid Suffolk Joint Local Plan through to adoption, you will not receive any subsequent updates relating to the Local Plan examination etc.

### Section 9: Signature & Date of Representation

Please sign and date below:	
Signature:	C.N.Loan
Date:	22.12.2020

After the end of the representation period the Councils will submit all individual representations received to the Secretary of State, together with a summary of the main issues raised during the representations period.

Information that you provide in your representation, including personal information, may be published or disclosed in accordance with the Environmental Information Regulations 2004 (EIR), or the Freedom of Information Act (FOI). If you want the information that you provide to be treated as confidential, please tell us, but be aware that under the EIR and FOI, we cannot guarantee confidentiality.

However, if you are submitting representations as an individual, the Council will process your personal data in accordance with the Data Protection Act 2018 and this means that if you request confidentiality, your personal information will not be disclosed to third parties.

For more information on how we do this and your rights with regards to your personal information, and how to access it, please visit our website or call Customer Services on 0300 123 4000 and ask to speak to the Information Governance Officer.

If you wish to request that the personal details submitted with this representation are treated in confidence and not published. (please tick the box)
Please explain below, why you have made this request:

## Babergh and Mid Suffolk District Councils

Strategic Planning Policy Team, Endeavour House, 8 Russell Road, Ipswich IP1 2BX

**Babergh and Mid Suffolk Joint Local Plan  
Pre-Submission (Reg 19) Document, November 2020**

**REPRESENTATIONS ON BEHALF OF  
THORCROSS BUILDERS LIMITED**



**LAND EAST OF IPSWICH ROAD, HOLBROOK**

**DECEMBER 2020**

# CONTENTS

- 1.0 Introduction**
- 2.0 Holbrook**
- 3.0 Comments on Policy SP03 - Settlement Hierarchy (& Settlement Hierarchy Review)**
- 4.0 Comments on Policy SP04 - Housing Spatial Distribution (& Place Maps)**
- 5.0 The Site – Land East of Ipswich Road, Holbrook**
- 6.0 Proposals for Housing Allocation – Land East Of Ipswich Road, Holbrook**
- 7.0 Summary and Conclusions**

## **Appendices**

1. Holbrook Facilities Map
2. Site Plan – Land East of Ipswich Road, Holbrook
3. Approved Access Plans
4. 2020 SHELAA Map - Holbrook
5. Sustainability Appraisal - Site LA068 Holbrook
6. Holbrook Action Project Report 2005
7. Holbrook Parish Meeting Notes 30/10/17

## **Consultant Documents also submitted with and supporting this statement**

- Development Zoning & Landscape Strategy – *Option 1* (Drawing No. NC17.404-P201 Rev A) by Nigel Cowlin Associates
- Development Zoning & Landscape Strategy – *Option 2* (Drawing No. NC17.404-P202 Rev A) by Nigel Cowlin Associates
- Access Appraisal (Nov 2017) – Journey Transport Planning
- Flood Risk Assessment and Drainage Strategy (Nov 2017) - GH Bullard & Associates
- Ecological Advice (Letter dated 08.11.17) – t4 ecology Ltd
- Heritage Statement (09.11.17) – Barry Hillman-Crouch

## 1.0 INTRODUCTION

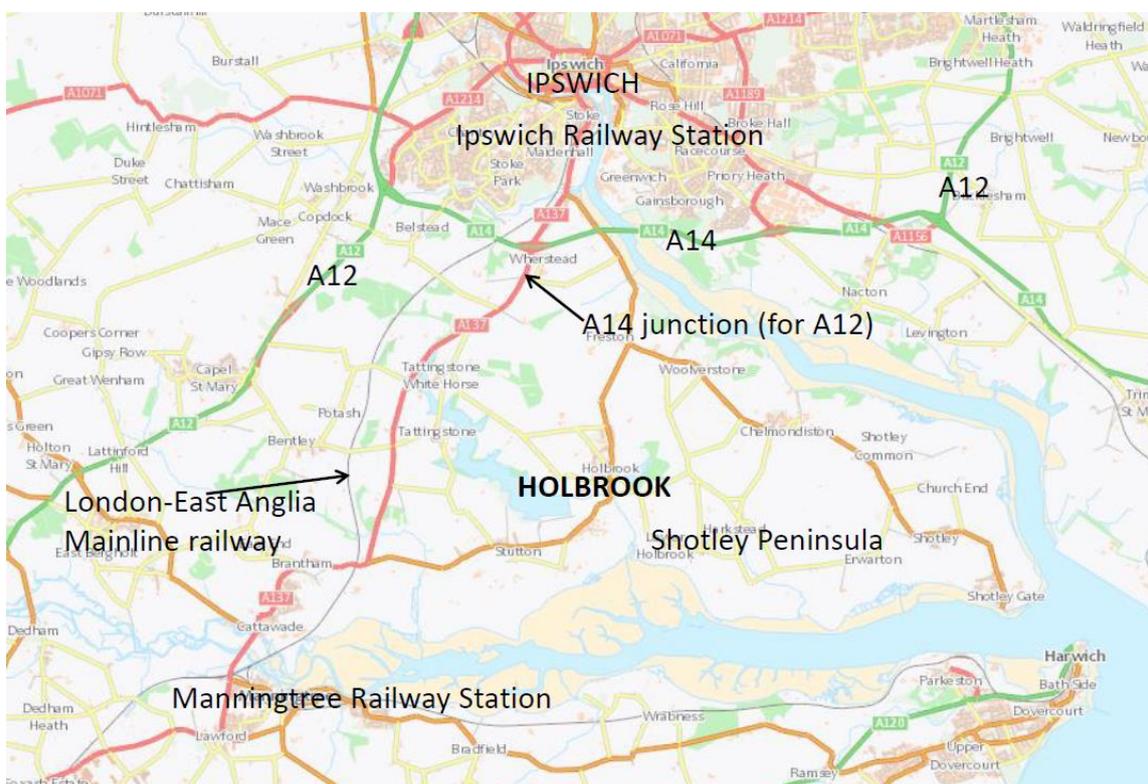
- 1.1 This document is submitted as part of representations made on behalf of Thorcross Builders Limited to the Babergh and Mid Suffolk Joint Local Plan ('JLP') Pre-Submission (Reg19) Document, November 2020 [The Reg 19 JLP].
- 1.2 Thorcross Builders Limited are promoting *Land East of Ipswich Road, Holbrook, Suffolk* (the 'promoted land') for a residential allocation in the JLP.
- 1.3 The promoted land was previously confirmed by Babergh District Council as 'potentially suitable' for development. It was identified by the Local Planning Authority (LPA) as Site Ref: SS0717 in the Strategic Housing and Economic Land Availability Assessment (SHELAA) August 2017 but did not feature in its full extent in the subsequent SHELAA's in 2019 and (most recently) October 2020.
- 1.4 Representations by Thorcross Builders Limited were first made to the LPA regarding the potential allocation of the promoted land in response to the Babergh and Mid Suffolk Joint Local Plan Regulation 18 Consultation (August 2017).
- 1.5 Subsequently, representations were made to the JLP Consultation (July 2019), which proposed long term allocations for the period to 2036. Within that document, only a small part of the promoted land was proposed to be allocated for housing. Such allocation was for 10 dwellings, 7 of which already have planning permission, representing a net allocation of 3 dwellings.
- 1.6 In the current Reg 19 JLP document, the LPA has further reduced the proposed allocation, this time to 7 dwellings, representing a net allocation of 'zero' dwellings on the promoted land, after taking account of the extant planning permission. Again, the remaining part of the promoted land has been overlooked by the LPA and there is no clear evidence that it has been properly assessed. This affects the soundness of the Plan.
- 1.7 The council's proposed 7 unit allocation is the *only* proposed allocation in Holbrook, which is a 'Core Village'. Given the village's reasonably high status in the JLP's proposed settlement hierarchy, the 'net' allocation of zero dwellings for Holbrook over the 18 year period 2018-2036 is woefully inadequate and unjustified. There are no other sites in Holbrook which the LPA support, as these have been assessed and ruled out. However, the LPA has not assessed the remaining part of the client's promoted land.
- 1.8 These representations put the case for a larger housing allocation upon the land being promoted, taking into account the objectives of Babergh DC as set out in the Reg 19 JLP.
- 1.9 Thorcross Builders Ltd commissioned a range of professional consultants to assess their promoted site and provide advice on a range of issues including planning, landscape, drainage, ecology, highways/transportation and heritage. The team includes:
  - Springfields Planning and Development – advising on town planning matters
  - Nigel Cowlin Associates – advising on landscape matters
  - Journey Transport Planning – advising on highways and access matters
  - GH Bullard & Associates – advising on drainage matters

- t4 ecology Ltd – advising on ecology matters
- Barry Hillman-Crouch – advising on heritage matters

- 1.10 The advice received from consultant team has been incorporated in to this statement, with the intention to demonstrate that the *Land East of Ipswich Road, Holbrook* should be allocated for a greater and more suitable amount of residential development in the JLP. The Inspector is asked to note that Thorcross Builders Limited is a long standing developer based in the Babergh area, having produced numerous high quality housing schemes over the years. They therefore have a good track record in delivery.
- 1.11 The specialist reports submitted as supporting documents to this Planning Statement, as part of representations to the Reg 19 JLP, include the following:
- Development Zoning & Landscape Strategy – *Option 1* (Drawing No. NC17.404-P201 Rev A) by Nigel Cowlin Associates
  - Development Zoning & Landscape Strategy – *Option 2* (Drawing No. NC17.404-P202 Rev A) by Nigel Cowlin Associates
  - Access Appraisal (Nov 2017) – Journey Transport Planning
  - Flood Risk Assessment and Drainage Strategy (Nov 2017) - GH Bullard & Associates
  - Ecological Advice (Letter dated 08.11.17) – t4 ecology Ltd
  - Heritage Statement (09.11.17) – Barry Hillman-Crouch
- 1.12 The detailed professional work undertaken along with the track record of delivery by Thorcross Builders Limited will give confidence that a larger allocation at the promoted land will be deliverable.
- 1.13 This statement will set out why the Reg19 JLP is not legally sound and consequentially that appropriate modifications to the Plan should be made, enabling a larger, deliverable site allocation to come forward.

## 2.0 HOLBROOK

- 2.1 Holbrook is located about 5 miles (circa 7.5km) south of the centre of Ipswich. It is centrally positioned within the Shotley Peninsula and acts as a focus for a number of smaller settlements around it.
- 2.2 The village lies in reasonably close proximity to the strategic road network including the A12 and A14.
- 2.3 It is also in close proximity and accessible by public transport/road to both Ipswich and Manningtree railway stations, which lie on the London to East Anglia mainline railway.
- 2.4 Details are shown on the map below.



Map showing Holbrook, its proximity to the A12 and A14 and mainline railway stations

- 2.5 The village has a recorded population of 2180 (2011 Census). However, according to information previously cited on the Holbrook Parish Council website, the estimated number of residents of Holbrook in 2013 was 2343. The population is likely to be even higher than this, following the subsequent construction and occupation of numerous houses to the north-east side of the village by Taylor Wimpey. Furthermore, the 2011 census records the 'electoral ward' population of Holbrook was 2,467. The village and its ward are therefore of a reasonable scale.
- 2.6 Holbrook is proposed in the Reg 19 JLP as a 'Core Village', within the Settlement Hierarchy which is supported by Thorcross Builders Limited. Policy SP03 indicates that,

***"Core Villages will act as a focus for development".***

2.7 The adopted Core Strategy also references Holbrook as a ‘Core Village’ although the Reg 19 JLP departs from the currently employed ‘functional cluster’ approach by which Holbrook acts as a focus for nine ‘hinterland’ villages and hamlets, within its functional cluster. These are stated by the adopted Core Strategy to include:

- Chelmondiston
- Erwarton
- Freston
- Harkstead
- Shotley
- Stutton
- Tattingstone
- Wherstead
- Woolverstone

2.8 It is not clear why the Reg19 JLP has departed from the ‘functional cluster’ approach. Irrespective of this, it is important for the inspector to note that Holbrook does act as a ‘focus’ for many if not all of the smaller villages and hamlets listed. This is due, in no small part, to the fact that such settlements (including coastal settlements) lie on a peninsula, and therefore have less choice regarding access to facilities and services. For example, the only state secondary school on the Shotley Peninsula lies in Holbrook (Holbrook Academy).

2.9 As evidenced below, Holbrook has a good range of services and facilities, such that it should attain a reasonably high status in the proposed settlement hierarchy and in turn be considered for a suitable amount of allocated housing growth in the period to 2036. This approach would assist the retention and enhancement of Holbrook’s services and facilities, many of which will also be used by the residents of surrounding settlements on the peninsula. **Whilst the Reg19 JLP correctly identifies Holbrook as a Core Village, no meaningful housing allocation has been made in the village** (see later in these representations).

2.10 Relative to its scale of population, Holbrook and its immediate locality has an excellent range of facilities and services. These are listed below with some key ones highlighted:

#### Educational Facilities

- Holbrook **Primary School**
- Holbrook **Pre-school** Playgroup
- **Holbrook Academy** (state secondary education)
- Royal Hospital School (private school)
- The Cabin Club (Breakfast Club, After School Club and Holiday Club, 2-11 year olds)

#### Leisure Facilities

- Peninsula **Sports Centre**
- **Recreation Ground** (Reade Field)
- **Play Areas**
- **Pavilion** at Reade Field (NB proposals for new pavilion have been under consultation)
- Various Clubs and Societies

- Alton **Water Sports Centre**, incl. Sailing Club, café and visitor centre
- Alton Water Cycle Hire

#### [Shops, Pubs, Food & Drink](#)

- Co-Op **Supermarket**
- **Post office** within the supermarket
- **ATM** machine (at Co-Op)
- **Butchers** (Woodys the Butchers)
- **Public Houses** - The Swan and The Compasses
- Mobile hairdresser (NB 'RenLeys' Hairdressers closed down January 2017)
- Mobile fish & chips service
- Mobile pizza maker

#### [Medical Facilities](#)

- Holbrook **Doctor's Surgery**
- **Dispensary/Pharmacy** (at Surgery)

#### [Community Facilities/Services](#)

- Holbrook **Village Hall**
- **Bowling Green**
- All Saints **Parish Church**
- **Methodist Church**
- Mobile **library service**
- Recycling Facilities (paper, batteries, glass, textiles)
- Defibrillator
- Holbrook (On-call) **Fire Station**
- Policing by Hadleigh Safer Neighbourhood Team
- Anchor – St Mary's Care Home
- Various Clubs and Societies
- Clench Road Telephone Box Book Exchange

#### [Transport Services/Bus Stops](#)

- Bus Services (nos. 92 and 98) including daily peak time services to/from Ipswich, starting 0736 hrs, arriving Ipswich Railway Station at 0754 hrs and Ipswich Bus Station at 0800 hrs.
- School Buses (no.615 and 6166) serving Holbrook Academy via local villages & Ipswich
- Bus Stops located along Ipswich Road, the nearest ones being adjacent The Compasses PH to the south and near Berners Field to the north, within easy walking distance along surfaced footways.

2.11 Many of the facilities in the village are shown on the submitted Holbrook Facilities Map at **Appendix 1**. This plan also shows the subject site and its close proximity to key facilities.

- 2.12 The range of facilities and services in Holbrook indicates that the village is a sustainable location and suitable for a reasonable degree of new housing growth.
- 2.13 However, facilities in recent years have disappeared, including the hairdresser's shop, newsagent and separate post office, although the latter two are effectively provided for at the Co-Op supermarket. Also, the hairdresser who used to run the hair salon shop set up a mobile service. The vulnerability of local services gives one planning reason in support of further housing at Holbrook, also helping to sustain the needs of the existing population in the village and its hinterland.
- 2.14 Based on the above assessment, including its status as 'Core Village', its range of services/facilities and reduced need to travel (given the existence of a supermarket, primary and secondary schools, supermarket, a surgery/pharmacy, etc) **Holbrook is highly suitable to accommodate a reasonable scale of housing allocation in the JLP.**
- 2.15 **This suggested approach would also tie in with the Reg 19 JLP's stated objectives.**
- 2.16 Paragraph 08.01 states that,
- "Development **needs to be accommodated** in settlements where the need to travel can be reduced, through **good access to facilities and services.**"*
- 2.17 The need to travel is reduced due to good service provision. Travel out of the village will mainly be for work commuting and leisure, although this is generic to all Core Villages. In this case, Holbrook has the benefit of good bus services to Ipswich (where significant employment exists) and mainline railway stations serving large settlements (eg London, Chelmsford and Colchester).
- 2.18 Paragraph 08.04 of the Reg19 JLP indicates that,
- "Each category of settlements will be **required to contribute towards the future growth** of the districts. It is **important that development is proportionate to the provision of services and facilities within those settlements**"*
- 2.19 Accordingly, meaningful "growth" via a suitable housing allocation, proportionate to the services and facilities of Holbrook, as a categorised Core Village, is "required" according to the JLP. Such growth is not proposed however in the Reg19 JLP.
- 2.20 These representations provide further critique of the Reg19 JLP, showing that its intentions regarding the required growth of the Core Villages are not matched in the case of Holbrook as there is no meaningful housing allocation being proposed. This in turn affects the soundness of the JLP, not only to the JLP's objectives being ignored but also as the social and economic aspects of supporting villages as set out in the NPPF are not complied with. The JLP lacks sustainability as a long terms strategy as there is a better alternative ie allocate meaningful growth to Holbrook.

### 3.0 COMMENTS ON POLICY SP03 - SETTLEMENT HIERARCHY (& SETTLEMENT HIERARCHY REVIEW)

- 3.1 Within Babergh DC, the Reg19 JLP proposes a tiered approach to the settlement hierarchy as per Policy SP03/Table 2, comprising the Babergh Ipswich Fringe, Babergh Market Towns & Urban Areas, Babergh Core Villages, Babergh Hinterland villages and Babergh Hamlet Villages. This approach informs the proposed Babergh District housing distribution at Policy SP04, which these Representations comments on later.
- 3.2 There is no objection in principle to the Reg 19 JLP **tiered settlement hierarchy** as a means to create the housing distribution strategy, although **its execution is neither robust nor sound**.
- 3.3 Paragraph 02.03 the Reg 19 JLP refers to Babergh's "main centres" as Pinewood, Hadleigh and Sudbury and also states, "The historic market towns are *surrounded* by a rural hinterland comprising 198 rural parishes". However, in the case of the Shotley Peninsula, none of the parishes could be described "surrounding" or being a "hinterland" to any historic market town. The nearest of the three main centres is Pinewood, which is neither historic nor a market town, being largely a 20th Century suburb of Ipswich.
- 3.4 At Policy SP03/Table 2, 15 no. Core Villages are proposed in the Reg 19 JLP for Babergh. This represents a 50% increase in the number of Core Villages in the adopted Core Strategy which has only 10 no. Core Villages. This may have a longer term negative impact on the vitality/viability of existing Core Villages due to more thinly spread housing allocations between them. It is also the case that some Core Villages are proposed to be allocated a disproportionately large share, relative to others.
- 3.5 Five new Core Villages have been designated. The first of these is Great Cornard, which was previously treated as a town/urban area together with Sudbury but is now separated from it within the settlement hierarchy. The four other new Core Villages are Acton, Brantham, Shotley Street and Sproughton. These are currently ranked as 'Hinterland Villages' in the adopted Core Strategy, with the exception of 'Shotley Street' which (being different to 'Shotley' as a whole, as it does not include Shotley Gate) has no identified designation.
- 3.6 The Reg 19 JLP explains its approach to identifying the relative sustainability of villages at paragraph 08.03 which states:
- "A weighted scoring system has been used to indicate the relative sustainability of villages, by identifying Core Villages, Hinterland Villages and Hamlets Villages. Due to the dispersed nature of some settlements in Babergh and Mid Suffolk, the settlement hierarchy assesses the sustainability of settlements themselves, rather than the wider parish"*.
- 3.7 The Reg 19 JLP 'weighted scoring system' is set out in its Topic Paper entitled *Settlement Hierarchy Review (November 2020)* [SHR].
- 3.8 The SHR uses a scoring matrix to determine a points score for each village. Settlements need to score - a somewhat arbitrary - 18 or more points to be designated as a Core Village, whereas 9 to 17 points is used to designate a (much smaller and less sustainable) Hinterland Village. It is not clear why 18 points has been used as the threshold to determine Core Village status. This may be to help justify (and possibly in a 'retrofit' style) the council's preferred housing

allocations and to assist other infrastructure objectives being met in the smallest Core Villages, which upon critical review could more appropriately be deemed as a 'Hinterland Village'.

- 3.9 The SHR provides the following total point scores for the Babergh Core Villages:
- Acton - 20
  - Bildeston - 20
  - Boxford - 22
  - Brantham - 19
  - Bures St Mary - 21
  - Capel St Mary - 25
  - East Bergholt - 25
  - Glemsford - 24
  - Great Cornard - 31
  - Holbrook - 22
  - Lavenham - 25
  - Long Melford - 31
  - Nayland with Wissington - 18
  - Shotley Street - 19
  - Sproughton - 19
- 3.10 The SHR ranks Holbrook in the top half (equal seventh highest out of 15 Core Villages) and therefore it is reasonably high up the 'pecking order'.
- 3.11 It is noted that the newly declared Core Villages at Acton, Brantham, Shotley Street and Sproughton all scrape past 18 points (19 each, except Acton at 20 points which has increased by one point from the predecessor SHR dated 2019). All other Core Villages score at least 21 points, with the exception of Nayland 'with Wissington' (18 points).
- 3.12 At Policy SP03 and Table 2 of the Reg19 JLP and Table 6 of the SHR, Nayland has been listed in its own right. However, at Appendix 1 (Page 8) of the SHR Nayland is scored as Nayland "with Wissington". It therefore appears that there is some conflict between Policy SP03 and the SHR. Paragraph 2.2 of the SHR states, "This Topic Paper reviews services and facilities available to a settlement rather than a parish". Given that Nayland with Wissington scores the minimum score to be determined as 'Core Village' the Inspector must look at this aspect critically, as it appears that the SHR has scored two settlements as one, contrary to Paragraph 2.2 of the SHR. Potentially Nayland (and Wissington) should be downgraded to a 'Hinterland Village'.
- 3.13 The reasons for points awarded to villages under the scoring matrix are not evidenced in detail where required. For example up to 5 points are awarded for 'food & drink outlets'. The scores do not state exactly which facilities in each category are available so it is left to the reader to interrogate the outcomes. More evidence is required.
- 3.14 The scoring matrix provides subjectively weighted points to each category in the matrix. Paragraph 2.1 of the SHR explains that, "*The weighted scoring system is based on the relative importance of each facility available within a settlement, in that some services are more essential and used more frequently than others, such as a primary school or a convenience store. As these are important facilities that reduce the need to travel by car and support the vitality of the local community, they are given a score of 2 points. Other facilities such as a*

*village hall or a recreation ground add to diversity and help build communities. Such facilities score 1 point, as they do not contribute as significantly to people's day to day needs".*

- 3.15 It should therefore be the case that secondary school should score the same as a primary school, being an important community facility in Holbrook village, which *"reduces the need to travel"* for those attending the school who live in this village and will *"support the vitality of the local community"*. However, the matrix only awards 1 point to a secondary school but 2 points to a primary school. This is one example of a clear inconsistency of approach in the weighting given to categories under the points based scoring system in the SHR. This matter is quite critical to helping understand the *"relative sustainability of villages"* (Para 08.03, Reg19 JLP) and especially Holbrook.
- 3.16 Further to the concerns stated about the lower scoring Core Villages (and whether they should be classed instead as Hinterland Villages) it is noted that the LPA has changed the SHR scoring system in the 2020 version of the SHR document, compared to the 2019 version, in relation to doctor's surgeries and pharmacies. In the SHR 2019, a doctor's surgery was awarded 2 points and a Pharmacy was also awarded 2 points. In the SHR 2020, a doctor's surgery or a pharmacy are awarded 2 points for one or the other but not both combined. This change in scoring goes against the Reg 19 JLP philosophy of 'reducing the need to travel'. Not all villages which have a doctor's surgery will have a pharmacy (or vice versa), as was apparent from the SHR 2019. Therefore, those patients who are diagnosed at a village surgery may have to travel out of the village to obtain their required medication, *increasing* the need to travel. This is a counter intuitive change to the scoring system which has damaged Holbrook's score (2 points instead of 4) as it has *both* a surgery and a pharmacy.
- 3.17 Those lowest scoring Core Villages which only have either a doctor's surgery *or* pharmacy *or* none at all (Acton, Bildeston, Bures St. Mary, Nayland with Wissington, Shotley Street, Sproughton) are seen to more sustainable "relative" to Holbrook and the other Core Villages which have *both* a surgery and pharmacy. This may fit the council's agenda (and the JLP's intended settlement strategy) in respect of these smaller Core Villages but is not sound planning. The changed approach also diminishes the importance of a doctor's surgery and pharmacy being together in a village, noting that the SHR 2020 'methodology' (page 2) states that these both provide,
- "a vital service to many communities, particularly with an ageing demographic"*.
- 3.18 Clearly the SHR scoring system has paid little attention to its own stated 'methodology' as it counts either a doctor's surgery or a pharmacy as a 'vital service' but not both together.
- 3.19 Holbrook's previous newsagent closed down and is effectively incorporated in to the village convenience store. In these circumstances an 'additional' point should be awarded in the 'other retail' category, adding to the 2 points awarded (presumably for the ATM and butchers). If such counting of 'other retail' is permitted in this way, then an extra point would be awarded to Holbrook, taking its points total to at least 23 points (or 25 points if 2 points are awarded separately for a Doctor's Surgery and a Pharmacy, as per the SHR 2019). This would mean Holbrook's score is then on a on a par (assuming there are no changes to its score) with the points awarded by the SHR to Capel St Mary, a village which the JLP Consultation proposes to deliver a significant amount of housing growth via new allocations.

- 3.20 The SHR matrix awards points where a strategic employment site lies within 5km and where a town/urban area lies within 5km. This approach is effectively ‘double counting’. Given that the towns/urban areas offer these same strategic employment site opportunities and/or reasonable scale employment opportunities generally in any event, it is inappropriate to award ‘double points’ ie for both categories added ‘together’. In the cases of Sproughton, this skews its score to 19 when a balanced approach to avoid double counting would reduce it by 2 points to 17 points and in so doing remove them from Core Village status which has an 18 point threshold in the JLP. Acton would also reduce from 20 points to 18 but still scrape the threshold required for Core Village Status.
- 3.21 In respect of these two criteria, the SHR does not explain why a 5km threshold has been used and as such the distance is therefore somewhat arbitrary. It takes no account of whether there is available and regular public transport to the strategic employment areas of town/urban areas in question. To this end the SHR is a blunt tool if it is being used as part of establishing environmental sustainability. Some Core Villages may be closer than others to strategic employment areas and towns/urban areas but if regular public transport is not available then the private car will likely be used, to the detriment of climate change objectives. In the case of Holbrook, the employment and other settlement facilities offered in nearby Ipswich (7.5km to the centre) are available and can be accessed by regular and peak time public transport.
- 3.22 Shotley Street is awarded 3 points in the SHR for each food and drink outlet (but there are only 2 – Rose at Shotley and Lasan Takeaway). Also, it is awarded 1 point for a place of worship, although the nearest church does not lie in “the village”, being over 1km distant, so zero points should be awarded. As a consequence, the score of the Shotley Street under the SHR should be reduced by 2 points from 19 to 17. This takes Shotley Street out of the Core Village designation, being under the 18 point threshold. On this basis, the 50 housing units allocated in the JLP to Shotley Street is therefore an unsound approach.
- 3.23 Brantham scores 4 for food and drink outlets but only appears to have three (The Crown, The Ark and Fontana, noting that the Bull is halfway between Brantham and Stutton) so one less point is appropriate. This brings Brantham’s matrix score down to 18 and this is at the fringes of Core Village designation. 30 units are proposed in this village.
- 3.24 Accordingly, the inclusion of Shotley Street as a Core Village within Policy SP03 appears inappropriate based on its sustainability credentials.
- 3.25 In summary:
- It is not clear why 18 points is the required threshold for determining Core Village status. Several Core Villages only just scrape this score
  - The point scoring regime in the SHR Matrix is somewhat arbitrary and not fully explained
  - The way in which the scoring system works appears to include some elements of double counting (ie the 5km distance criteria to strategic employment and towns/urban areas). Points are awarded in the SHR to doctor’s surgeries or pharmacies but not both. The methodology has the effect of unfairly skewing scores towards particular villages

- 5 more Core Villages for Babergh are introduced in the Reg 19 JLP Consultation, increasing the number of Core Villages by 50% from the adopted Babergh Core Strategy. This may have a longer term negative impact on the vitality/viability of existing Core Villages due to more thinly spread housing allocations between them. This is particularly apparent in the case of Holbrook's proposed allocation.
- 4 of newly declared Core Villages proposed in the Reg19 JLP at Acton, Brantham, Shotley Street and Sproughton just meet or narrowly exceed the arbitrary 18 point threshold and their inclusion as Core Villages should be critically reviewed
- The newly proposed Core Village of Shotley Street has been scored incorrectly under the SHR Matrix and as a result falls under the 18 point threshold for inclusion as a Core Village and should be removed from Core Village status
- Spoughton, Acton and Brantham are all marginal candidates regarding a Core Village status.
- Holbrook has been under-scored in the SHR Matrix, as it has not been awarded points for its Secondary Education facility, this being the only such facility on the Shotley Peninsula. Its score should be on a par with, or at least very similar to, Capel St Mary, another Core Village which is proposed in the Reg 19 JLP to deliver *substantial* housing allocations, whereas Holbrook would receive virtually new net growth (after existing planning consents are taken into account)
- The council's SHR should be updated to take account of these representations, allowing a truer status of certain villages and small settlements to be understood under Policy SP03 and categorised at Table 2. This may in turn ensure a more appropriate housing allocation in the respective settlements under Policy SP04 as part of the JLP's housing distribution strategy.
- Shotley Street should be removed as a Core Village and downgraded to a Hinterland Village at Table 2. It does not have the facilities to achieve such status and this allows it to be given a larger housing allocation than should otherwise be the case if it becomes a Hinterland Village. Shotley Street lies on the Shotley Peninsula in a less sustainable location than Holbrook (Core Village) but is proposed to receive a 50 dwelling allocation whereas Holbrook receives 7 dwellings. The facilities in Holbrook may suffer in the long term if they are not kept viable through use, partly assisted by new housing allocations which would also address housing needs and affordable housing in Holbrook.
- Some or all of Shotley Street's 50 unit allocation should be removed and directed towards the more sustainable location of Land east of Ipswich Road, Holbrook (subject of related representations). This would be a more sustainable approach in line with the NPPF and a more appropriate option, giving a remedy to the Plan's lack of soundness.

#### 4.0 COMMENTS ON POLICY SP04 - HOUSING SPATIAL DISTRIBUTION (& PLACE MAPS)

4.1 Policy SP04 of the Reg 19 JLP Consultation sets out Babergh's proposed Housing Spatial Distribution April 2018 to March 2037, taking account of the Settlement Hierarchy at Policy SP03/Table 2. Homes in Babergh are proposed for distribution as follows: Ipswich Fringe (2,046 homes/21%), Market Towns/Urban Areas (3,161 homes/33%), Core Villages (2,699/28%), Hinterland Villages (866/10%), Hamlets (339/3%) and Windfall (500/5%). 9,611 homes are proposed in total of which 4,036 have outstanding planning permission as at 1 April 2018 and 5,575 represent provision for 'New Homes'. Figures are indicated as minimums.

4.2 Policy SP03 (Settlement Hierarchy) states inter alia that:

*(1) In all cases the scale and location of development will depend upon the role of settlements within the settlement hierarchy defined in Table 2 and Table 3 and the spatial distribution, the capacity of existing physical and social infrastructure or new/enhanced infrastructure, as well as having regard to the built and natural environment. Development which would lead to visual or physical coalescence of settlements will not be supported;*

*(2) Ipswich Fringe settlements, Market Towns/Urban Areas and Core Villages will act as a focus for development, will be delivered through site allocations in the Plan and/or in Neighbourhood Plans, and windfall development in accordance with the relevant policies.*

*(3) Settlement boundaries have been created as defined on the Policies Map in order to demonstrate the extent of land which is required to meet the development needs of the Plan. New allocations are included within the defined settlement boundaries...*

4.3 Thorcross Builders Limited agrees that Core Villages should act as a focus for development, along with the Ipswich Fringe and Market Towns/Urban Areas. However, there are concerns that by increasing the number of Core Villages from 10 (in the adopted Core Strategy) to 15 as proposed in the JLP Consultation this could undermine the longer term vitality and viability of facilities and services in existing (adopted Core Strategy) Core Villages, as housing allocations might be spread too thinly between these important settlements. This is particularly true of Holbrook given its meagre housing allocation proposed in the Reg19 JLP.

4.4 Holbrook is identified in the Reg19 JLP as Core Village and therefore attains a relative importance in the settlement hierarchy under Policy SP03/Table 2. It is clear that Holbrook, as one of the Core Villages which is required to '*act as a focus for development*' should therefore receive appropriate housing site allocations, subject to the caveats of the policy.

4.5 However, it is apparent that the council has paid little attention to Holbrook's Core Village status and the attributes of the village. Holbrook is proposed to receive a housing allocation of merely 7 dwellings in the Reg 19 JLP, all of which already have outline planning permission (on the promoted land) as private dwellings. This represents a 'net' allocation of zero dwellings in Holbrook for the 19 year period 2018 to 2037, after accounting for the extant planning permission. The Reg19 JLP's proposals are relatively meaningless as an allocation because the site will be developed regardless of the Reg 19 JLP's proposals.

4.6 This means Holbrook has no meaningful long term housing allocation for the period until 2037. This is not a sound approach. **To leave a Core Village without an effective long term housing**

**allocation puts the retention of numerous services and facilities in the village at risk. It also contradicts with the council’s own proposed Settlement Hierarchy at Policy SP03 (sic).**

- 4.7 Policy SP04 (Housing Spatial Distribution) indicates Babergh Core Villages are proposed to receive 28% of the all housing (2,699 out of 9,611 homes) in the district in the period 2018 to 2037. By contrast the Mid Suffolk’s Core Villages are proposed to deliver 38% of its housing requirement. Babergh Core Villages would deliver a minimum of 2699 dwellings, of which 1268 homes have outstanding planning permissions as at 1 April 2018 and 1411 homes will come forward on new housing allocations.
- 4.8 **The Reg19 JLP proposes 15 no. Core Villages for Babergh District. This means – on average – that each would deliver at least 180 (179.93) homes (ie 2699/15) during 2018 to 2037**, of which 94 homes (ie 1411/15) would be delivered upon new housing allocations. The average figure of 94 homes minimum can therefore be used as an approximate ‘rule of thumb’ regarding ‘new’ housing allocations per each Core Village (before taking account of other constraining factors). **By contrast the Core Village of Holbrook receives a gross allocation of just 7 dwellings** (7 of which already have planning permission post 1 April 2018) ie a net allocation of zero dwellings.
- 4.9 Holbrook’s proposed new homes allocation to 2037 (as a ‘gross’ figure of 7 dwellings) is merely 0.49% of the minimum new homes requirement for Core Villages (ie 7/1411 x 100). Seven allocated homes equates to a rate of only 0.37 homes (average per annum) in Holbrook, for the 19 years period of the JLP, **representing only one new home every three years.**
- 4.10 The Reg 19 JLP identifies with maps and text (Part 3 – Place and Allocation Policies) the proposed allocations in each Babergh DC settlement. The table below has been produced to illustrate the wide disparities with the housing distribution strategy for Babergh Core Villages as proposed in the Reg19 JLP. There are clear ‘winners’ and ‘losers’.

Babergh Core Village	Reg 19 JLP Housing Site Allocation(s) in Core Villages	% of All Reg 19 JLP Housing Site Allocations in Core Villages (including Sproughton)* (x/3610x100)	% of All JLP Housing Site Allocations in Core Villages (excluding Sproughton)** (x/1960x100)
Acton	100	2.8%	5.1%
Bildeston	75	2.1%	3.8%
Boxford	0	0%	0%
Brantham	125	3.5%	6.4%
Bures St Mary	0	0%	0%
Capel St Mary	650 (100+550)	18.0%	33.2%
East Bergholt	229 (10+144+75)	6.3%	11.7%
Glensford	0	0%	0%
Great Cornard	554 (8+46+500)	15.3%	28.3%
<b>Holbrook</b>	<b>7</b>	<b>0.2%</b>	<b>0.4%</b>
Lavenham	20	0.6%	1.0%
Long Melford	150	4.2%	7.7%
Nayland	0	0%	0%
Shotley Street	50	1.4%	2.6%
Sproughton	1650 (105+800+475+50)*	45.7%	n/a**
<b>Total</b>	<b>3610* (or 1960**)</b>	<b>100%***</b>	<b>100%***</b>

\* Assumes all of Sproughton’s New Housing Allocation is pursuant to its Core Village status

\*\* Assumes all of Sproughton’s New Housing Allocation is pursuant to its Ipswich Fringe status

\*\*\* Total Percentages may not tally exactly due to rounding

- 4.11 It is not clear whether the Reg 19 JLP's proposed (1650) total housing allocation for Sproughton is made pursuant to its Core Village status or Ipswich fringe status (or a mixture of the two). Accordingly, two alternative scenarios are presented in the table. The total Core Village's New Housing allocation in either scenario ranges between 1960 and 3610. These figures are significantly different to the figure listed at Policy SP04/Table 2 which indicate that there will be 2699 homes (2018-2027) in Core Villages, comprising 1288 existing planning permissions and 1411 new homes. The reasons for these discrepancies are unclear.
- 4.12 As will be seen from the table above, Holbrook receives an insignificant housing allocation of between 0.20% and 0.4% of the total Core Villages proposed housing allocations. Four other Core Villages would receive no housing allocations whatsoever. This **unbalanced approach conflicts with the stated requirements of Policy SP03 which indicates that Core Villages should act as a 'focus for development'**. The LPA is failing to implement its stated strategy correctly.
- 4.13 By contrast, some Core Villages receive a disproportionately large amount of housing site allocations in relative terms. For example Capel St Mary, *which has a similar matrix score to Holbrook as evidenced in the SHR*, receives between 18.0% and 33.2% of the total Core Village new housing allocation. Great Cornard (15.3% - 28.2%) also receives a significant allocation. Sproughton stands out with 45.7% of the new homes allocations, assuming these are all counted as within the Core Village and not shared with the Ipswich Fringe element of the Settlement Hierarchy.
- 4.14 There is an evidenced disparity and lack of balance to the housing allocations proposed in the Core Villages, taking account of what the JLP's stated objectives. Paragraph 08.04 of the Reg19 JLP Consultation states that, *'Each category of settlements will be required to contribute towards the future growth of the Districts. It is important that development is proportionate to the provision of services and facilities within those settlements, and as such, the Ipswich Fringe, Market Towns/Urban Areas and Core Villages categories will take the largest levels of growth. The settlement hierarchy needs to be considered in combination with the Spatial Distribution. However, all settlements within each category are not equal, and there will be some variance in levels of growth dependent upon a number of factors, including the availability of suitable development sites, infrastructure capacity and considerations of the built and natural environment.'*
- 4.15 The Reg19 JLP fails to take account of the status of Holbrook and allocate housing for the village 'proportionate' to the services and facilities it currently offers. The Reg19 JLP notes that not all settlements within each category are equal and that there will be some variation in growth levels. Whilst this is understood, the degree of variance of housing allocations within Core Villages, in particular Holbrook, is not justified.
- 4.16 The promoted land at Holbrook subject of these representations is demonstrated (see later) to be suitable to accommodate reasonable levels of housing growth, taking account of *the built and natural environment*. It is noted that the plan presented on Page 15 of the Reg19 JLP Consultation does not show Holbrook to be directly affected by strategic constraints, apart from lying in the Zones of Influence for European/ Habitat Sites and RAMS zone.
- 4.17 The council's approach to leaving a number of Core Villages, including Holbrook, bereft of any or any significant/effective new housing allocation is unwarranted in terms of the Reg19 JLP's

stated Objectives, as well as Government planning policy set out in the NPPF which supports rural communities and their services. The Reg19 JLP's unbalanced approach to Core Villages also threatens deliverability for the reason that too much housing in one Core Village may take longer to come forward (eg due to market/commercial reasons). It makes commercial sense for each village to be provided with at least one 'meaningful' housing allocation not only to ensure those villages retain vitality but also to provide balance to - and better certainty of - housing delivery across the district.

- 4.18 Paragraph 03.03 of the Reg 19 JLP states its 'Objectives', which for *Housing* include at subsection i) the,

*'Delivery of the right types of homes, of the right tenure in the right place meeting need'.*

- 4.19 In this respect, Core Villages are an important part of the council's settlement hierarchy and are in 'the right place' (as they offer numerous services/facilities) but several in Babergh, including Holbrook, are excluded from being provided with any or any meaningful housing allocations in the Reg 19 JLP. For example, Holbrook is located much closer to/more accessible to Ipswich and the A road network than Shotley Street (a dubiously ranked Core Village). However, Shotley Street, which has less facilities and lies deeper into the Shotley Peninsula but is proposed with a 50 homes allocation, compared to Holbrook's 7 homes allocation. This is not justified.

- 4.20 With regard to *Healthy Communities & Infrastructure*, the Reg19 JLP Objectives are stated at paragraph 03.03 vii,

*'To enable all communities to thrive, grow, be healthy, active and self sufficient through supporting the provision of the necessary Infrastructure, and encouraging more sustainable travel'.*

- 4.21 However, it is clear that the council is not supporting all villages, including Core Villages in Babergh, due to no (or no meaningful) housing allocations being made for several of them. Accordingly, Core Villages, such as Holbrook, will not be able to *grow and thrive* in the way the Reg19 JLP Objectives aim for them to do. An allocation of approximately one house every three years for the 19 year period 2018-2037 is not meaningful to meeting JLP Objectives (and indeed NPPF Objectives to support rural communities) particularly when one bears in mind that those same 7 dwellings *already have planning permission*.

- 4.22 Notes from a Holbrook Parish Meeting on 30 October 2017 (**Appendix 7**) stated that, "*a discussion took place about the four options and what they might mean for Holbrook. Whilst some felt that whichever option gave the minimum amount of development should be chosen, others suggested that **the village needs more growth to remain sustainable for the life of the plan which is twenty years..***"

- 4.23 The Reg 19 JLP at paragraph 02.04 notes various 'Key Social Issues'. In respect of i. *Delivering Housing*, it states that,

*'Significant numbers of new homes need to be planned for over the Plan period along with employment and community facilities and services in Babergh and Mid Suffolk respectively'.*

4.24 In this respect Holbrook as a Core Village should have an important role to play in delivering part of the significant numbers of houses required, if the JLP's is to be deemed sound.

4.25 In respect of Key Social Issue ii, *Achieving an Uplift in Delivery*, the JLP notes that,

*'Rates of annual housing delivery in Babergh and Mid Suffolk have been consistently below target. The number of homes to be delivered per annum has increased with the application of the Standard Methodology which means that from 2018 onwards the annual rate of housing to be delivered has also increased by around 40% in each council. The revised uplift in housing numbers compounds the challenges of delivery.'*

4.26 Given these circumstances it is important that the JLP has sufficient flexibility to deliver the challenging target of 416 homes per annum as required under Policy SP01, in particular ensuring that those Core Villages, such as Holbrook, which are able to deliver housing growth are provided with suitable housing allocations. This will bring balance to the housing strategy, and flexibility of delivery, especially where (other) villages with less strong housing markets are delayed in delivering their housing allocations in times of economic difficulty.

4.27 Regarding Key Social Issue iii, *A Growing & Ageing Population*, the JLP notes that,

*'By 2036 the population in Babergh is expected to grow by around 7,300 people in Babergh and by approximately 9,300 people in Mid Suffolk, an increase of 8% and 9.2% respectively. **The increasing age of the population is a significant factor contributing to the overall level of population growth.** Both Districts have an ageing population with 45 to 59-year olds representing the single largest age group at present. In addition, a significant percentage of the population are aged 65 years or older (26.2% in Babergh and 24.5% in Mid Suffolk). Babergh and Mid Suffolk also have a relatively long-life expectancy at about 81 years for males and about 84 years for females. **As the population ages, there will be different demands on housing, infrastructure, services and facilities.***

4.28 By the end of the JLP Plan period in 2037, it is therefore likely that the single largest age group will be 62 to 76 year olds. Holbrook is well placed to cater for this age group because the village is compact (ie easy to reach facilities by walking) and includes, inter alia, a doctor's surgery, dispensary, convenience store, post office, bowls club, pubs and village hall. However, given the expected increase in the elderly population, Holbrook must make adequate and meaningful allocations for housing suitable for the elderly and downsizing, such as bungalows. The Reg 19 JLP fails to do so and this demonstrates a complete lack of foresight and provision for this element of the population. Without any adequate provision, those elderly residents needing suitable accommodation or wishing to downsize may need to move out of the village in future years, leaving friend and family behind. This is clearly contrary to the NPPF's social objectives. The Reg19 JLP's approach comprises neither positive planning nor a justified strategy.

4.29 Highlighting this matter, notes from the Holbrook Parish Meeting on 30 October 2017 (**Appendix 7**) stated, *"there is a need for bungalows or other accessible smaller housing that older people can move into and free up family homes."*

4.30 The 2014 Suffolk Housing Survey (reported in Babergh DC's 'Holbrook Socio – Economic Profile 2016' indicates in Holbrook that: 25% of households think their current property will not be

suitable for their needs in 10 years' time; Suitable housing options for more elderly people are less available within the current housing stock; and 6% of all households have elderly relatives who may need to move to Suffolk within the next 3 years. These issues will need to be addressed in the JLP.

- 4.31 At Key Social Issue iv. *High Levels of Housing Need and a Poor Affordability*, the JLP states that, *'House prices on average are approximately 11 times above the average earnings of residents in Babergh and approximately 9 times above the average earnings in Mid Suffolk and rural parts of the Districts are unaffordable for many'*.
- 4.32 As the Reg 19 JLP makes no or no meaningful housing allocations in respect of several Core Villages, including Holbrook, the result is that **there is no prospect of market-led affordable housing being provided**. The Reg 19 JLP would therefore fail many of its larger communities in this regard, for example those in housing need in Holbrook may need to leave family/friends and move out of the village (and district) in search of affordable housing in other areas eg Ipswich. Suitable allocations for housing in Holbrook will allow this Core Village to deliver affordable housing for its community over the life of the JLP to 2037. The JLP must therefore address this matter to ensure social sustainability of the Plan in accordance with the NPPF.
- 4.33 The Holbrook Parish Meeting on 30 October 2017 (**Appendix 7**) highlighted that *"more affordable housing, whether this is lower cost smaller houses for purchase or social housing for rental is required"*.
- 4.34 The Reg19 JLP goes on to give reasons why there may be some disparities in the allocations in settlements in the District. Paragraph 9.5 states, *'Cumulatively, allocations of importance to delivery of the Joint Local Plan (in particular key infrastructure delivery and meeting local housing need) will be attributed to new housing growth in the following criteria:*
- *Key sites in the Ipswich Fringe*
  - *Settlements along the A14/mainline railway corridor (Mid Suffolk)*
  - *Settlements along the A12/mainline railway corridor (Babergh)*
  - *Settlements requiring new school and/or healthcare sites'*
- 4.35 The Reg 19 JLP key diagram at Page 15 refers to a 'Strategic Transport Corridor', which shows an arbitrary zone either side of the A12 in Babergh. Capel St Mary lies within this A12 Corridor which may explain its substantial housing allocation in the Reg 19 JLP and indeed its disproportionate allocation relative to Holbrook which lies a few miles beyond the Corridor but has a similar level of facilities and services. Paragraph 9.6 states, *'The transport corridors of the A12, A14 and railway lines within the area represent a strong effect upon market forces and demand for both housing and employment land. Compatible growth along these areas can help to reduce the need to travel by ensuring closer location of where people live, relative to shops, services and employment..'*
- 4.36 However, the council's favouritism towards making a disproportionate housing allocation in Capel St Mary (in comparison to Holbrook) due to its location in the Strategic Transport Corridor is misguided. This is because Capel St Mary and Holbrook lie a similar distance to Ipswich where many shops/services and significant employment (which villagers will travel to) are found. In respect of rail accessibility (which assists outcommuting eg to Colchester) London, Chelmsford), Capel St Mary lies a similar distance to the mainline railway stations by

road as Holbrook. By the most appropriate road routes, the subject site at Holbrook lies 8.8km from Ipswich railway station whereas the centre of Capel St Mary lies *more distant* at 10.4km.

- 4.37 In respect of Manningtree mainline railway station (which is not annotated properly on the Reg19 JLP Key Diagram) Holbrook lies 10.6km distant whereas Capel St Mary lies slightly closer at 9.7km. The reality is that there is little difference in the respective distances for either Holbrook or Capel St Mary to access railway stations (NB - it is easier for Holbrook). It is inappropriate for the council to weight its housing allocations massively in favour of Capel St Mary (compared to Holbrook) due to any perceived or actual proximity to railway services. The JLP's strategy is thus only seen to favour Capel St Mary primarily due to its better proximity to the A12 and as such the inevitable reliance on car based transport has no benefit in respect of addressing climate change objectives and reducing travel.
- 4.38 With regard to weighting housing allocations in favour of "*settlements requiring new school and/or healthcare sites*", the JLP must evidence justification for this approach, particularly where it is, seemingly, at the expense of other Core Villages like Holbrook which are to be left without any or any meaningful Local Plan housing allocation in the 19 year period 2018-2037. This representation cites the example of Shotley Street, which the Reg 19 JLP proposes as a (new) Core Village, but is of doubtful suitability for reasons previously set out.
- 4.39 The Reg 19 JLP proposes a 50 unit allocation for Shotley Street. There appears to be no justification for such allocation, other than the fact that Shotley Street is proposed somewhat dubiously (for reasons given earlier) as a Core Village. The JLP indicates that,
- "An extension to Shotley CP School will be required to facilitate growth in the Shotley catchment area and planned commitments. Contributions towards healthcare may be sought from planning applications submitted in the Holbrook & Shotley Health Practice area."*
- 4.40 However, the only new growth in the form of housing allocations proposed by the Reg 19 JLP in the Shotley catchment area is within Shotley Street. There is a lack of evidence to justify the housing allocation in this settlement, particularly where Holbrook - the largest single settlement in the Shotley Peninsula - is set to receive no meaningful housing growth.
- 4.41 The council's approach to massively favour some Core Villages with housing allocations at the expense of other Core Villages like Holbrook, which receive no or little housing allocations, conflicts with the intentions of the Reg 19 JLP stated at Paragraph 09.06 which continues, "*..Babergh and Mid Suffolk are both rural districts, with a wide variety of settlement types **and it is important that all communities throughout the area are helped to maintain vitality and services.** Consistent with national planning policy, this Plan seeks to create flexibility and policies for appropriate rural growth."*
- 4.42 The NPPF at paragraph 83 states that, "*planning policies and decisions **should enable...d) the retention and development of accessible local services and community facilities**, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship."*
- 4.43 Given the policies at paragraph 09.06 of the Reg 19 JLP and Paragraph 83 of the NPPF, Core Villages should be assisted in maintaining their vitality and services. In the case of Holbrook these include the convenience store, primary school, secondary school, a sports centre, pubs,

the surgery, dispensary, as well as the bus services, one of which connects the Holbrook/Shotley Peninsula to Ipswich.

4.44 It is also the case that other lower order settlements in the hierarchy are being prioritised over Core Villages like Holbrook. There are 32 housing allocations proposed to be made in Hinterland Villages and Hamlets in Babergh (page 209 of the Reg 19 JLP). **In Hinterland Villages and Hamlets 20 of these 32 proposed housing allocations are the same as or greater than the 7 unit allocation proposed for Holbrook (a Core Village).** Some examples of allocations proposed for lower order settlements in Babergh include:

- the Hinterland Village of Chilton (allocated a massive 130 dwellings)
- the Hinterland Village of Stutton (allocated 54 dwellings)
- the Hinterland Village of Elmsett (allocated 42 dwellings)
- the Hinterland Village of Chelmondiston (allocated 39 dwellings)
- the Hamlet of Cockfield - Mackenzie Place (allocated 51 dwellings)
- the Hamlet of Leavenheath - High Road (allocated 40 dwellings)

4.45 **The council's approach to allocating these smaller settlements such high numbers of dwellings taking account of the services they offer and the objectives of the settlement strategy is not justified when considering the alternative of allocating more housing to Holbrook.**

4.46 Holbrook is a higher order settlement and has a good range of services and facilities which require protection, yet this Core Village is not proposed in the Reg 19 JLP to have any meaningful housing allocation in the Plan period.

4.47 Furthermore, the way in which the settlement boundaries pursuant to Policy SP03 have been drawn around certain lower order settlements implies that these have potential to accommodate more than 10 dwellings within them, such that they could deliver more housing over the next 19 years than some Core Villages, such as Holbrook (which has a tightly defined settlement boundary). Whether or not this would happen in practice remains to be seen and may in part depend on Neighbourhood Plans allocating sites, or otherwise Windfall schemes.

4.48 In respect of Neighbourhood Plans, Policy SP03 confirms that (inter alia) Core Villages will act as a focus for development, *'which will be delivered through site allocations in the Plan and/or in Neighbourhood Plans.'* Paragraph 09.03 notes that, *'A significant number of Neighbourhood Plans (NPs) are emerging throughout the Plan area, with a range of local issues and objectives being planned for. The District Councils have produced minimum housing requirement figures for these areas to assist the NP groups in the formation and progression of those plans. In identifying the respective NP requirement figures, the Councils have been mindful of their duty to ensure that the overall district Plan requirement figures can be met.'*

4.49 The Reg 19 JLP at Table 04 sets out Babergh's 'Minimum Housing Requirement' for Neighbourhood Plan Areas. However, there is no evidence how these 'minimum housing requirements' have been calculated. There is a lack of transparency and evidence. Holbrook has low housing requirements (65 dwellings) compared to villages of similar size eg Capel St Mary (792 dwellings).

- 4.50 The question may also arise as to the soundness of the Reg 19 JLP strategy if it is planning 'to the wire' for some settlements to deliver housing and would then also rely on Neighbourhood Plans help further the settlement strategy.
- 4.51 Not all Neighbourhood Plan making bodies will wish to allocate housing. In the case of Holbrook, the local Neighbourhood Plan team has assessed possible housing sites in the Neighbourhood Plan area and has discounted them all. This is further evidence that the **Core Village of Holbrook is likely to be left without any meaningful future growth for the next 19 years** or so, as both the LPA and Neighbourhood Plan body are seemingly resistant to growth of this Core Village.
- 4.52 The Table 04 Neighbourhood Plan Area housing figures also show a great disparity and inconsistency between settlements and settlement types. For example, Holbrook is ranked by the SHR in the top half (7<sup>th</sup> equal) of 15 Core Villages in Babergh and has a Neighbourhood Plan allocation of 68 dwellings. Capel St Mary and East Bergholt - *which have similar levels of services and facilities* - have requirements of 792 homes and 241 homes respectively. This is disproportionate, unjustified and unsound as distribution strategy.
- 4.53 Similarly, the lower order (*hinterland village or hamlet*) settlements of Bentley (52 homes), Chelmondiston (52 homes), Elmsett (49 homes), Great Waldingfield (39 homes), Leavenheath (44 homes) and Stutton (65 homes) have disproportionately high housing requirements in comparison to Holbrook. If the housing figures for these lower order settlements are deemed appropriate, then the council needs to justify why Holbrook has a disproportionately low housing allocation, given that it is a Core Village with many services and facilities (which need to be protected).
- 4.54 Against the above background, **Holbrook as a Core Village should be allocated for a greater level of housing in the JLP**. The next chapter indicates why the site on land east of Ipswich Road Holbrook is a suitable candidate to help deliver housing in accordance with JLP objectives.
- 4.55 In summary:
- Core Villages should act as a 'focus for development' according to the Reg 19 JLP. However several Core Villages, including Holbrook, would not receive any or any meaningful housing allocation in the 19 year Plan period 2018 to 2037
  - To leave a Core Village without an effective housing allocation puts the retention of services and facilities in that village at risk. It also contradicts with the council's own stated objectives.
  - The Reg19 JLP proposes 15 no. Core Villages for Babergh District. This means – on average – that each would deliver 180 homes during 2018 to 2037, of which 94 homes would be delivered upon new housing allocations. The average figure of 94 homes minimum can therefore be used as an approximate 'rule of thumb' regarding 'new' housing allocations per each Core Village (before taking account of other constraining factors). By contrast the Core Village of Holbrook receives a gross allocation of just 7 dwellings (7 of which already have planning permission post 1 April 2018) ie a net allocation of zero dwellings.

- The Reg 19 JLP states that it is important that development is “proportionate” to the provision of services and facilities within settlements. It is therefore unwarranted for several Core Villages, such as Holbrook, to be left without any or any meaningful housing allocations for the period to 2037, given the services and facilities such villages offer
- In Hinterland Villages and Hamlets, 32 proposed housing allocations are proposed, 20 of which are the same as or greater than the 7 unit allocation proposed for Holbrook (a Core Village). Some examples of allocations proposed for lower order settlements in Babergh include:
  - the Hinterland Village of Chilton (allocated a massive 130 dwellings)
  - the Hinterland Village of Stutton (allocated 54 dwellings)
  - the Hinterland Village of Elmsett (allocated 42 dwellings)
  - the Hinterland Village of Chelmondiston (allocated 39 dwellings)
  - the Hamlet of Cockfield - Mackenzie Place (allocated 51 dwellings)
  - the Hamlet of Leavenheath - High Road (allocated 40 dwellings)

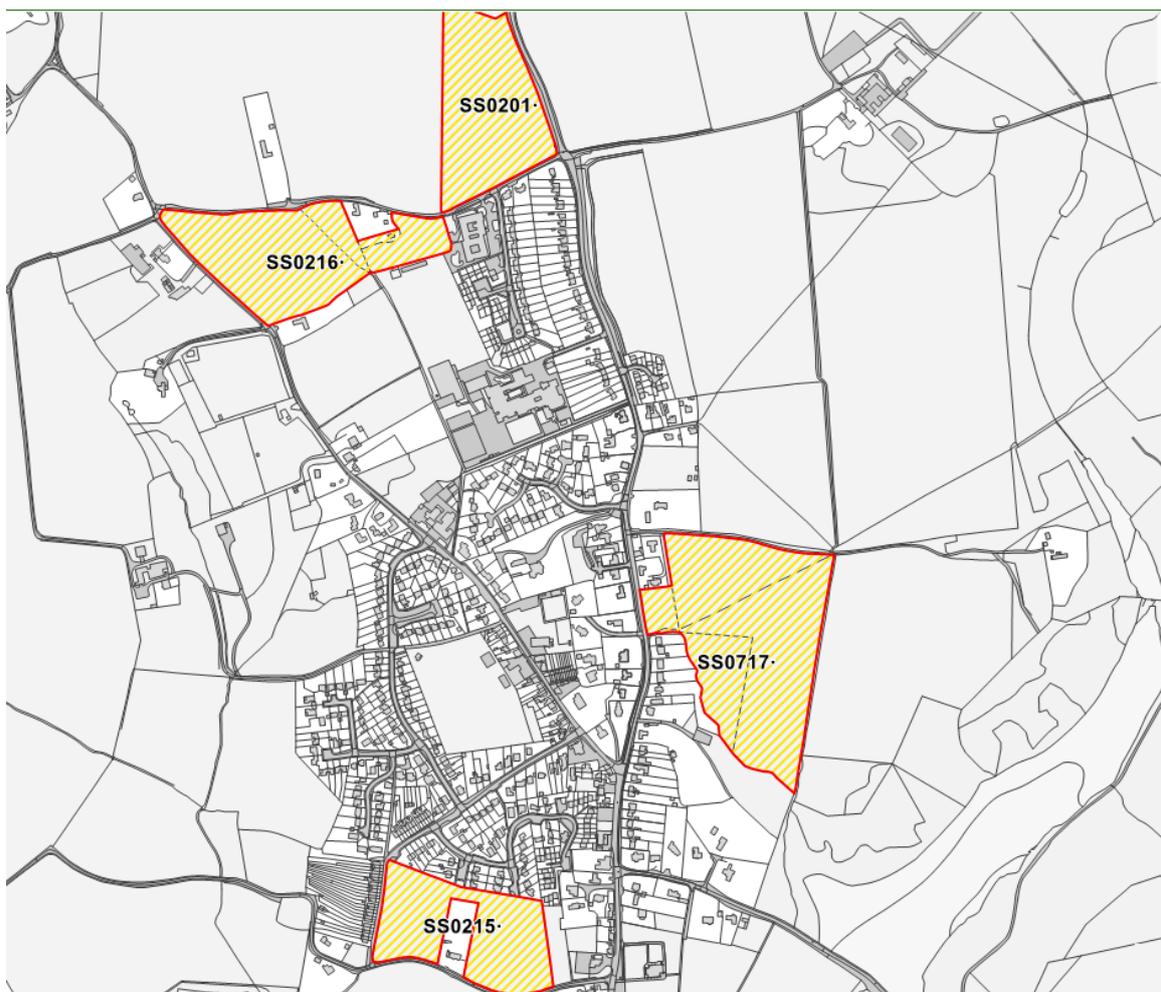
The council’s approach to allocating these smaller settlements such high numbers of dwellings taking account of the services they offer and the objectives of the settlement strategy is not justified when considering the alternative of allocating more housing to Holbrook and should be reviewed by the Inspector

- The council acknowledges the challenges of a 40% uplift in housing numbers. Delivery is threatened by omitting housing allocations from several Core Villages such as Holbrook which are well placed to deliver housing. Development should be spread over all appropriately designated Core Villages, including Holbrook, to enhance prospects of the JLP’s required housing being delivery and provide flexibility of delivery
- Lack of housing allocations in some Core Villages such as Holbrook will fail to address issues of affordability and fail to provide for the increasing housing needs of the elderly age group
- The Reg 19 JLP proposed strategy to favour larger housing allocations in settlements within an arbitrarily designated strategic transport corridor in Babergh is not justified. For example Capel St Mary (where the Reg 19 JLP proposes to deliver 650 ‘new’ homes) lies further away from Ipswich railway station by road than Holbrook, a village with a similar level of services and facilities which the Reg 19 JLP only proposes to allocate with 7 homes.
- Settlement boundaries drawn around certain lower order settlements imply that these settlements have potential to accommodate more than 7 dwellings within them, such that they could deliver more housing over the next 19 years than some Core Villages with tightly defined settlement boundaries and limited (or nil) allocations, such as Holbrook
- It is not clear how Neighbourhood Plan area housing requirements have been calculated. Several lower order settlements are shown with similar Neighbourhood Plan housing requirements as the Core Village of Holbrook and therefore are not “proportionate” in relation to services and facilities offered in the respective settlements.

## 5.0 THE SITE – LAND EAST OF IPSWICH ROAD, HOLBROOK

### Background

- 5.1 This representation has set out the case for the JLP to make a suitable housing allocation in the Core Village of Holbrook. The Reg 19 JLP does not propose any meaningful allocation in this village, which is not justified in consideration of the stated ‘Objectives’ and also NPPF policy which supports rural economies and protection of services/facilities.
- 5.2 Three large housing sites were identified for Holbrook within the Draft Strategic Housing and Economic Land Availability Assessment (SHELAA) August 2017, including Land East of Ipswich Road, Holbrook (the Promoted Land). Four sites in Holbrook were considered under the 2019 and 2020 SHELAA's but only the western part of the promoted land (Site Reference SS0717) was evidenced as being properly assessed, upon which the Reg 19 JLP proposes to allocate 7 homes. The Inspector is requested to consider all of the Promoted Land and its suitability for a housing allocation.
- 5.3 The map taken from the council's on line ‘Call for Sites Submissions 2019’ shows the four sites that have been put forward under the Call for Sites for potential housing allocations in Holbrook.



- 5.4 Apart from the Promoted Land, none of the three other Holbrook sites have been deemed suitable by the LPA for selected as a housing allocation, as evidenced in the SHELAA 2020. These include:

- Site Ref SS0201 - Land west of B1080 and north of Woodlands Road, Holbrook.  
Reason: "Site has poor connectivity to the existing settlement"
- Site Ref: SS0215 Land at Hyams Lane, Holbrook  
Reason: "Site lies within a cordon sanitaire and lies within an area of high heritage sensitivity".
- Site Ref: SS0216 Land south of Woodlands Road, Holbrook  
Reason: "No possibility of creating suitable access to the site".

5.5 This only leaves the Promoted Land as the only potentially suitable option. The SHELAA 2020 has not evidenced any overriding technical constraints to the development of the whole of the Promoted Land reference SS0717 – Land East of Ipswich Road, Holbrook.

5.6 In making the 7 unit allocation (**Reg 19 JLP site allocation ref LA068**), the SHELAA states,

*"only part development (road frontage development) is recommended in order to avoid disproportionate development to the existing settlement"*.

5.7 It is noted that the three other discounted sites in Holbrook were not deemed unsuitable due to any concern over "disproportionate development", so it is unclear why this was an issue of concern only for this site. This is not a fair or sound approach to assessment of the Promoted Land.

5.8 Details of the Land East of Ipswich Road, Holbrook are set out below. This site was previously promoted in representations to Reg 18 JLP Consultation.

5.9 Paragraph 09.08 of the Reg 19 JLP explains the rationale for site selection as follows:

*'The specific new development locations are identified on the Policies Maps at the end of the document. The new development locations have been identified with consideration to consultation responses, the availability and deliverability of sites, the preferred spatial distribution pattern, the sensitivities and constraints of the area (eg. flood zones, heritage features and landscape designations etc) and the infrastructure capacity and opportunities (eg. schools and healthcare etc). Sites judged to perform best overall against the above criteria and evidence base outcomes have been proposed in this document'.*

5.10 At page 300 of the Reg19 JLP, the council offers the following comments concerning Holbrook:

*Located on the Shotley Peninsula, approximately 8km south of Ipswich, Holbrook is classified as a Core Village. Lower Holbrook is classified separately as a Hamlet Village. To the north of the settlement, the landscape is classified as Ancient Estate Claylands. The majority of the landscape to the south of the settlement is classified as Rolling Estate Farmlands, with smaller sections of Valley Meadowlands and Plateau Estate Farmlands. There are few Grade II listed buildings within the core of the settlement, with the Grade II\* Church of All Saints located on the southern edge of the settlement. To the east of the settlement lies the extensive post-medieval landscape of Holbrook Gardens, and to the south lies a historic mill complex and Grade II\* listed Royal Hospital School and Grade II associated buildings. The Royal Hospital*

*School plays an important role in the local economy and offers an educational role to a large catchment area. The Suffolk Coast and Heaths AONB borders the settlement to the south.*

*There is currently sufficient primary school capacity to accommodate existing planning commitments and allocated Plan sites within the Holbrook catchment area. However, additional pre-school provision is required, which could be achieved by expanding existing facilities. An expansion to Holbrook Academy will be required. An expansion to Holbrook and Shotley Health Practice may be required to facilitate Plan growth. Holbrook lies within the RAMS 13km Zone of Influence; therefore contributions will be sought for all developments involving the creation of new dwelling(s).*

- 5.11 This chapter and the following chapter (Proposals For Housing Allocation – Land East Of Ipswich Road, Holbrook) therefore provide details of the Promoted Land and consider the criteria of paragraph 09.08 and comments at page 300 of the Reg 19 JLP.

#### **Site Context - Land East of Ipswich Road, Holbrook (The Promoted Land)**

- 5.12 The Promoted Land is located to the eastern side of Ipswich Road, Holbrook and is well located in relation to existing residential development, village facilities and main road access.
- 5.13 The site is shown on submitted Drawing TH49/L1 and overhead plan (**Appendix 2**). It totals 6.14ha.
- 5.14 The majority of the site (5.787 ha) includes land in active agricultural (arable) use as well as a private woodland (*currently* with no access to the public) within the south-west part of the site area. Thorcross Builders Limited is working in partnership with the owners of that land regarding the promotion of the site. This arrangement demonstrates availability and deliverability, which are factors the JLP states are taken in to account.
- 5.15 The overall site area also includes a smaller land parcel to the most westerly part of the site, which has a road frontage (approximately 66m) to Ipswich Road. This is a B road and comprises the main road through the village, connecting to Ipswich approximately 5 miles to the north. This separate parcel of land measures 0.357 ha and is entirely owned by Thorcross Builders Limited. It comprises short mown grassland which is not in any productive agricultural use. It is separated from the agricultural land further east by a tree screen about 45m back from the Ipswich Road frontage.
- 5.16 This smaller land parcel on its own is a logical infill housing site and has been allocated in the Reg 19 JLP for 7 homes. An earlier Babergh SHLAA stated that this particular small site (Site Ref SB261). was 'potentially suitable' for residential development and that a density of 30dph (9 dwellings) was considered appropriate, given the edge of village location.
- 5.17 Subsequently, Babergh DC granted outline planning permission for housing at this frontage site, under application reference DC/18/05228 (approved on 23 January 2019). The planning permission authorises the '*erection of 7 No. dwellings (comprising 2 No. 2 bed houses, 3 No. 3 bed houses and 2 No. 3 bed chalet bungalows) served via new access from Ipswich Road*'.
- 5.18 This consent approves details of the access from Ipswich Road (such that this is not a reserved matter). The access will serve not only to serve the approved 7 houses but was also designed

to allow for potential vehicular access to the rest of the land, behind to the east (ie the remaining part of the Promoted Land subject of these representations). Details of the approved access are presented at **Appendix 3**. The Access plan (Drawing TH52/03A) shows the specification and visibility splays of the access. The Site Plan (Drawing TH52/02A) shows the access in context with a 7 unit housing scheme. The access design includes a 5.5m wide carriageway, bellmouth radii kerbs at the Ipswich Road junction and 1.8m wide footways either side of the carriageway. The footways connect to existing footways serving village facilities.

- 5.19 Highway consultancy advice confirms the approved access has the potential to serve up to 100 dwellings. The planning permission has therefore provided the technical ability to unlock vehicular access to the serve additional housing on the remaining part of the Promoted Land behind to the east, which further strengthens the deliverability aspects of this land promotion for housing.
- 5.20 The Promoted Land, at its western end, is bounded by housing to each side, including Blackmore Barn and Gants Cottage (to the north) and Alpha (to the south). These properties form part of an almost unbroken line of existing (and permitted) residential properties on the east side of Ipswich Road, stretching circa 415m south of the site (up to All Saints Parish Church) and circa 620m to the north (this distance also incorporating the site of 78 houses permitted at the Taylor Wimpey housing estate under application B/14/01288/FUL on 28<sup>th</sup> July 2015).
- 5.21 Ipswich Road generally represents the eastern extent of the built up part of Holbrook (the village envelope includes properties within it) and therefore the site is logically located for the purposes of a housing extension to the village.
- 5.22 Internally, the open part of the Promoted Land is featureless given that it is predominantly in arable use. However, there are various mature border trees and hedgerows (in particular those to the far eastern and southern boundaries) and of course the large private woodland to the south-west side (which is not proposed for housing development but is included for completeness and amenity). The woodland comprises tall fir trees and therefore forms a very effective screen to any potential views of the site from the south. Equally, the site is also shielded by the houses and vegetation of properties along Ipswich Road, such that – from the road – the site is only readily apparent when seen from virtually next to the western frontage.
- 5.23 The Promoted Land is bounded to the northern extreme by a private track (including public footpath FP49) which serves a dwelling at the end. The track is outside of the site area. It has planting, partly interrupted along its northern side and the opportunity arises to provide a meaningful screen of planting on its southern side within the site.
- 5.24 A public footpath (FP21) crosses the Promoted Land. This runs from the Ipswich Road across the southern side of the smaller parcel of the land (adjacent 'Alpha') then heads diagonally across the arable land to the north-east corner of the site, where it joins up with other footpaths in the network. One of these includes a footpath (FP23) which runs outside of the site behind the mature hedgerow on the eastern boundary. In addition to FP23, other footpaths head off north-west (FP33) and north-east (FP32) from the site's NE corner, giving immediate access to the countryside for leisure pursuits.

5.25 This statement has already detailed the numerous facilities and services available in Holbrook. The submitted Access Appraisal notes that village facilities and amenities are all within 800m of the site and as such are within reasonable walking distance. However, the vast majority of village facilities are within 400m walking distance (ie within a 5 minute walk of the site frontage). Complete with footway access, it is clear that the site has good connectivity to village facilities and in these respects it is very well located. Holbrook's key facilities are compactly located for ease of access, beneficial to all user groups including the elderly.

#### **SHELAA – August 2017 ('2017 SHEELA')**

5.26 The Promoted Land was one of three sites identified and originally assessed in the Babergh and Mid Suffolk Joint Local Plan: Draft Strategic Housing and Economic Land Availability Assessment (SHELAA) August 2017.

5.27 The 2017 SHELAA noted that the overall site is 6.10 ha (more accurately, it is 6.14ha) and assessed its potential as a housing site. In respect of the suitability of the site it stated the following:

*Site is potentially suitable, but the following considerations would require further investigation:*

*Highways – regarding access, footpaths and infrastructure required*

*Heritage - Impact on nearby listed building and archaeological sites will need to be considered*

*Compatibility - appropriate design would need to be considered with regards existing development and open countryside*

*Townscape - partial development may be more appropriate and supportable*

5.28 The 2017 SHELAA indicated that **the site is available to deliver within 0-5 years**. It also stated that there are no known legal restrictions and no known abnormal costs which would affect viability.

5.29 The conclusions of the 2017 SHELAA were as follows:

*The site is potentially considered suitable for residential development, taking identified constraints into consideration. However only part development (western aspect of site) is recommended in order to avoid disproportionate development to the existing settlement.*

5.30 **An estimated yield was stated in the 2017 SHELAA as 30 dwellings**, this due to the 2017 SHEELA's conclusions that only the site's western aspect is developed. The reason was to avoid a 'disproportionate development' to the settlement, although such term is not qualified. It will be noted that the Reg 19 JLP requires development to be "proportionate" to the provision of services and facilities within settlements and in this respect Holbrook should receive a reasonably sizeable allocation (subject to no overriding constraints) as the village has numerous amenities.

5.31 Thorcross Builders Limited carefully considered the comments contained in the 2017 SHEELA and accordingly instructed reports to be prepared concerning the issues raised ie highways, heritage, landscape compatibility. Also, reports concerning ecology and drainage were prepared to provide enable a reasonably robust assessment of the site's potential as a housing allocation. The professional reports were submitted by Thorcross Builders Limited as part of their representations to the JLP Regulation 18 Issues and Options Local Plan Consultation and subsequently the JLP Regulation 18 Preferred Options Consultation. Further details of the professional assessments made in support of a housing allocation at the site are provided in Chapter 6.0 of this statement. This also sets out the proposed development options and assesses the impacts of a housing allocation at the site.

#### **SHELAA July 2019 ('2019 SHELAA') and SHELAA October 2020 ('2020 SHELAA')**

5.32 Given the positive comments of the 2017 SHELAA regarding the site on Land East of Ipswich Road, Holbrook along with the suite of professional assessments made by consultants of Thorcross Builders Limited (most recently submitted to the Reg 18 Preferred Options JLP consultation) it is of concern that the Reg 19 JLP does not propose to make any meaningful housing allocation upon the Promoted Land. **The 2017 SHELAA had envisaged a potential yield of 30 units at this site.**

5.33 The SHELAA 2020 provides the LPA's latest position regarding site assessments. In respect of the whole site on Land East of Ipswich Road, Holbrook, the 2019 and 2020 SHELAA assessments are not substantially made and thus there is little evidence to justify the Reg 19 JLP's proposed miserly allocation of just 7 homes at the front part of the Promoted Land (JLP site allocation reference LA068).

5.34 Page 182 of the 2020 SHELAA refers to Land east of Ipswich Road (Site ref SS0717) as 0.3ha, not the 6.14ha site which is being promoted. The on-line maps of the 2020 SHELAA identify this 0.3ha site as well as three other sites (see extract at **Appendix 4**). The map incorrectly indicates the extent of site SS0717 (ie the western most 'infill' portion of the site, adjacent Ipswich Road). By contrast, it also indicates the *full* extent of three other sites which have been deemed unsuitable within the 2020 SHELAA. Therefore, not all of the Promoted Land was seemingly assessed as the map does not even reference the rest of site SS0717, either as suitable or unsuitable.

5.35 In terms of Neighbouring Land Uses the 2020 SHELAA notes, "*agricultural, west of site is existing settlement*". It does not reference that village housing lies to the north and south ie to the east side of Ipswich Road. This is an important part of the site's residential context.

5.36 The 2020 SHELAA refers to the planning history. A planning permission was granted at the site for 7 dwellings in January 2019, as already detailed in this Representation. This largely renders site allocation of 7 homes on the same parcel of land as relatively meaningless as a Local Plan allocation.

5.37 Furthermore, the 2020 SHELAA assessment is highly confusing. It states under achievability that, "*that it could be expected that 20 - 25 dwellings per annum could be achieved*". This comment is again meaningless if only 7 dwellings are being put forward by the Reg 19 JLP as a site allocation. However, it would be meaningful and indeed sound planning if the greater

housing numbers as promoted for this Core Village site are proposed for allocation (see next Chapter).

5.38 In terms of suitability, the 2020 SHELAA states,

*Site is potentially suitable, but the following considerations would require further investigation:*

*Highways – regarding access, footpaths and infrastructure required.*

*Heritage - Potential impact upon heritage assets.*

*Townscape - partial development may be more appropriate and supportable.*

*Open Space - public rights of way passes through the site.*

5.39 These is some overlap with the issues to those raised (for the whole site) in the 2017 SHELAA. However, there is no reference as before to ‘Compatibility - appropriate design would need to be considered with regards existing development and open countryside’. Also the following specific reference no longer features: ‘Heritage - Impact on nearby listed building and archaeological sites will need to be considered’. Instead a more general heritage issue is cited.

5.40 Under Achievability the 2020 SHELAA states that ‘The submission confirms that there are no legal restrictions on the land and no known abnormal costs which would affect viability’.

5.41 The Site Conclusions of the 2020 SHELAA are,

*The site is potentially considered suitable for residential development, taking identified constraints into consideration. However only part development (road frontage development) is recommended in order to avoid disproportionate development to the existing settlement.*

5.42 An allocation to cover the 19 year period 2018-2037 of 7 homes is relatively meaningless for this Core Village (as its only allocation) and there is clearly scope to deliver a much larger allocation, without it representing a ‘disproportionate development to the existing settlement’ of Holbrook.

5.43 As stated earlier in this Representation, the council has taken an unbalanced approach to development allocations in key villages. Some examples are in the table below as follows:

Core Village	Existing Population (Census 2011)	JLP’s Proposed New Homes Allocation 2018-2037	Additional Population at 2.3 persons av. per household* (*2011 Census)	Percentage increase in Population due to JLP’s Proposed New Homes Allocation
Acton	1811	100	230	12.7%
Bildeston	1054	75	173	16.4%
Brantham	911	125	287	31.5%
Capel St Mary	2877	650	1495	52.0%
East Bergholt	2765	229	527	19.1%
Great Cornard	8908	554	1274	14.3%

<b>Holbrook</b>	<b>2180</b>	<b>7</b>	<b>16</b>	<b>0.7%</b>
Lavenham	1722	20	46	2.7%
Long Melford	3918	150	345	8.8%
Shotley Street	2342*	50	115	4.9%**
Spoughton	1376	1650	3795	276.0%

\* Census figure for Shotley Parish, not Shotley Street, so this includes Shotley Gate ie Shotley Street will be lower figure

\*\* % Population Increase for Shotley Parish, so the figure for Shotley Street alone will be much higher

- 5.44 As will be seen from the table above, a 7 unit allocation at Holbrook represents only a 0.7% increase to its population for the period 2018-2037. This would be the lowest of any Core Village in Babergh which is proposed for housing allocation in the Reg19 JLP.
- 5.45 *Smaller* Core Villages are set to receive greater percentage increases. As identified elsewhere in these representations, Hinterland Villages and Hamlets in Babergh will also receive more housing than Holbrook.
- 5.46 Sproughton’s population would almost treble.
- 5.47 Villages such as East Bergholt and Capel St Mary, which have higher populations than Holbrook but similar levels of facilities would receive significant population increases (19.1% and 52% respectively) as a result of the JLP’s proposed housing allocations.
- 5.48 If Holbrook was allocated 30 homes as mooted by the 2017 SHELAA, this would represent a population increase of only 3.2% (assuming 2.3 persons/dwelling) over the Census 2011 figure, which could hardly be stated as a disproportionate over the 19 period 2018-2037. Similarly, if 59 homes were allocated (this being the maximum ‘Option 2’ suggestion in these Representations) this would only amount to a 6.2% population increase and still below the increases proposed for other Core Villages in the JLP Consultation.
- 5.49 Given this analysis it is unjustified to prevent Holbrook from receiving a meaningful housing allocation on the basis that this would somehow lead to a *‘disproportionate development to the existing settlement’*. The LPA’s approach is inconsistent in comparison to housing allocations (and population increases) in other Core Villages. Also, the JLP’s stated strategy to avoid disproportionate settlement additions has not been executed properly, given the allocations it makes.

#### Other Sites in Holbrook

- 5.50 As stated earlier, the 2020 SHELAA rules out three other sites in Holbrook for Housing Allocation. The reasons stated are as follows:
- Site Ref SS0201 - Land west of B1080 and north of Woodlands Road, Holbrook.  
Reason: “Site has poor connectivity to the existing settlement”
  - Site Ref: SS0215 Land at Hyams Lane, Holbrook  
Reason: “Site lies within a cordon sanitaire and lies within an area of high heritage sensitivity”.
  - Site Ref: SS0216 Land south of Woodlands Road, Holbrook

Reason: “No possibility of creating suitable access to the site”.

- 5.51 Thorcross Builders Limited agrees that these other sites are much less suitable or achievable for housing development than the site on Land East of Ipswich Road, Holbrook.
- 5.52 In respect of land west of the B1080 and north of Woodlands Road, Holbrook (SHELAA ref: SS0201), this site was subject of a recently unsuccessful outline planning application (reference: DC/17/06037) proposing the erection of up to 30 no. dwellings. The application was due to be considered at the 30 May 2018 Planning Committee and was recommended for refusal by planning officers due to ‘the adverse impact on the special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty’.
- 5.53 However, the application was withdrawn on 29th May 2018. There was considerable local objection and unresolved concerns from consultees. In particular, there was significant concern from the council’s landscape consultee (Place Services, Essex CC) regarding the impacts of the site upon the surrounding landscape. This is contained in their consultation response dated 21st May 2018. The Dedham Vale AONB and Stour Valley Project also raised landscape concerns, as set out in their consultation response of 21st May 2018. There were also technical objections from Suffolk CC Floods & Water team and Natural England.
- 5.54 Holbrook Parish Council also raised numerous objections to the land north of Woodlands Road application on the grounds of site location, sustainability, character and appearance of landscape, highways, heritage and the impact on the area of outstanding natural beauty. In addition, there were 123 letters of representation made to this application which, added to the objections raised by the parish council, indicates a lack of support locally for development of that site. Thorcross Builders Limited particularly concur with the landscape concerns expressed by others given that this site has far reaching views and is very sensitive in landscape terms. A housing development at this site would appear quite exposed and would also necessitate significant change to the character of the rural lane at Woodland Road, partly due to change to the highway. A development of this land would appear somewhat awkward and contrived given the openness of the site, limited natural boundaries and spatial relationship to the rest of the village.
- 5.55 Additionally, the Holbrook Parish Meeting on 30 October 2017 (**Appendix 7**) stated that the Woodlands Road site is “different to the other proposed sites in a number of ways...it is seen to be ribbon development and additional to the village envelope rather than being within it”.
- 5.56 The site south of Woodlands Lane (SS0216) would also require similar changes to the Woodlands Lane character and is poorly connected to the village.
- 5.57 In addition to the SHELAA’s comments, the Hyams Lane site (SS0215) would likely need to be accessed through an existing housing area which has many parked cars along its route. Significant disruption to numerous residents could occur.
- 5.58 The Holbrook Parish Meeting on 30 October 2017 (**Appendix 7**) states regarding the Hyams Lane site that, “the main concerns are about traffic and the road system around the site which would need considerable improvement, and the density of development proposed”.
- 5.59 None of these other three sites offer the *locational advantages* of Land east of Ipswich Road.

## Strategic Environmental Assessment Scoping Report 2017

5.60 The SEA Scoping Report at Page 179 indicates in respect of Site Specific SA Evaluation that,

*To date the Council has received a large number of land proposal submissions (Call for Sites 2016) and it is likely that only a few sites will eventually be selected and approved for development.*

5.61 This statement rather prejudices the JLP's settlement strategy.

5.62 Page 179 continues,

*As a result, the Council together with local communities will have to assess the potential sites and make choices about which sites to allocate. A clear methodology is therefore required in order to assess the relative suitability of the various sites and help to identify the most appropriate sites. It is important that a logical process to allocate sites is followed and the allocated sites contribute to sustainability, with regards to the economic, social and environmental impacts and offer the best solution to meet identified community needs. The approach to considering site allocations will be a two stage process:*

*1) A Core Appraisal – this will consider the fundamental characteristics of the site/proposal and will assess the basic compatibility. If this test is failed, a detailed assessment will not be progressed.*

*2) Further analysis – this assessment will carry out detailed sustainability performance for the site/proposal, subject to meeting the compatibility of stage 1.*

5.63 It is clear from the council's evidence that in the case of submitted site comprising Land East of Ipswich Road, Holbrook this two stage process has not been undertaken. The council should therefore assess the whole site properly and reach conclusions accordingly. One particular issue for the LPA to address is why the 2017 SHELAA and 2020 SHELAA reach different conclusions on site capacity, the former stating 30 dwellings and the latter stating 7 dwellings.

### Sustainability Appraisal (SA): Environmental Report – October 2020

5.64 The SA Site Appraisal in respect of the 7 unit allocation at Site LA068 Land East of Ipswich Road provides commentary at Annex G (recreated at **Appendix 5**). It concludes:

*Overall, site SS0717 (**Land east of Ipswich Road, Holbrook**) performs relatively positively because it falls within desirable walking distance of a GP surgery, an open space, sport and/or recreation facility, in addition to open country and/or registered common land, a primary school, a secondary school, and a PRoW. Although the site is located within a SSSI impact Risk Zone and falls within or in close proximity to a Local Nature Reserve, County Wildlife Site and/or priority habitat or ancient woodland, there is potential for these negative effects to be mitigated.*

5.65 The comments are equally applicable to the larger parcel of land promoted, not just the 7 unit site allocation.

5.66 The following Chapter puts forward options for a larger site allocation and details why these options would be appropriate.

## 6.0 PROPOSALS FOR HOUSING ALLOCATION – LAND EAST OF IPSWICH ROAD, HOLBROOK

- 6.1 The overall Promoted Land comprises 6.14ha. However, a sizeable portion of this land (about 1.2ha) comprises woodland which is not proposed to be developed but could be made available for community use for the benefit of new and existing residents alike. It will also provide valuable screening and ecological functions.
- 6.2 Of the remaining land (approximately 4.9 ha), this is entirely greenfield land with no externally visible physical constraints such as internal trees, buildings, overhead power lines, etc. The ground levels do vary across the site. For example the land level is a little lower than the street level along Ipswich Road but this is not a major impediment to accessing the site. Indeed, a vehicular and pedestrian access from Ipswich Road has already been approved under planning application DC/18/05228.
- 6.3 The eastern extent of the land slopes from north to south, with the southernmost point being the lowest level of the site, estimated at around 2 metres lower than the northern extreme but given the overall site dimensions such variance is not likely to be unduly problematic as the gradient is not steep.
- 6.4 The net area of 4.9 hectares is not entirely proposed for residential development. This is mainly due to professional advice received concerning landscape issues, which are explained below. Following due analysis and consideration, the proposals put forward by Thorcross Builders Limited for the site's housing allocation in the JLP include two options as follows:

### Development Option 1 (34-51 dwellings on 1.7ha)

- 6.5 This option includes the western part of the site (1.7ha gross development area) on land contained by Ipswich Road to the west, housing to the north and south, woodland to the south and part of the lane to the north. The proposal is identified on the submitted drawing by retained landscape consultants, Nigel Cowlin Associates, entitled Development Zoning & Landscape Strategy – Option 1 (Drawing No. NC17.404-P201 Rev A).
- 6.6 The eastern extent of the development parcel would not extend beyond the eastern extent of the adjacent woodland. Because the proposed development area has no physical boundary to the east side, a new landscaped boundary is proposed here to complete the containment of the site in conjunction with the other physically defined boundaries.
- 6.7 The drawing shows that the 1.7 ha gross development area could accommodate:
- 34 houses @ 20 dph
  - 51 houses @ 30 dph
- 6.8 At 35% affordable housing, as required under Reg 19 JLP Policy SP02, the density options would achieve between 12 and 18 affordable dwellings.
- 6.9 A road access would be provided from Ipswich Road in to the development area. Advice from the retained highway consultant, Journey Transport Planning, as set out at paragraph 3.4 of in the Access Appraisal, indicates that an access of 5.5m wide carriageway with 1.8m footways on either side would be suitable in highway terms for serving up to 100 dwellings. Such access

specifications have already been approved under planning application DC/18/05228 and as shown on the approved access drawing (**Appendix 3**).

- 6.10 The existing footpath from Ipswich Road would retain its current alignment but would then be partly diverted so that it runs alongside the northern edge of the existing woodland. This will allow public access in to the woodland, which would be retained and managed with a view to becoming a public amenity. The footpath would then run along part of the development site's eastern boundary before rejoining the original footpath route.
- 6.11 The whole of the eastern portion of the land would be retained in current agricultural use and unaffected. However, should the release of this land be necessary to support a housing allocation (eg for related and identified open space needs) then this could be made available. However, it is anticipated that by opening up the woodland for public access, this will provide a substantial public amenity benefit for the existing and future residents of Holbrook.

#### **Development Option 2 (42-59 dwellings on 2.7ha)**

- 6.12 This option is an 'extended' version of Option 1. The western part of the site (Development Area 1) is proposed in a very similar way to the Option 1 proposal (ie 34-51 dwellings on 1.7 ha). However, Option 2 introduces an additional housing area (Development Area 2) to the south-east parcel of the site. This additional land comprises 1.0 ha gross development area and is proposed for a low density development at 8 dwellings per hectare ie 8 dwellings. This part of the site would include a rural style landscape framed development pattern.
- 6.13 As a total, the number of units would be 42-59 units. The proposal is identified on the submitted drawing by Nigel Cowlin Associates, entitled Development Zoning & Landscape Strategy – Option 2 (Drawing No. NC17.404-P202 Rev A).
- 6.14 Assuming 35% affordable housing, this option would achieve 15 to 21 affordable dwellings.
- 6.15 The Option 2 housing area would be accessed via a shared private drive, this extending off the access road serving the Option 1 site.
- 6.16 The north eastern area of the site would be used as an open space eg public open space or wildlife area, possibly for ecological mitigation. The realigned footpath would run through this area. The southern area of Development Area 2 is shown as a buffer area as this is adjacent a county wildlife site (CWS). The final layout would need to take account of the ecological recommendations as set out the advice letter from the retained ecologists, t4 Ecology.
- 6.17 A Hybrid Option (not shown) of 59 dwellings is also possible whereby the 59 dwellings of Option 2 are all proposed on the 1.7ha Option 1 'Development site' but similar benefits delivered. This would create a suitable low-mid density of only 34.7dph. The residual part of the Option 2 land where shown for 8 dwellings could remain open including for biodiversity.
- 6.18 Planning issues regarding the site and the suggested housing allocations are now considered, taking account of issues raised in the 2017 and 2019 & 2020 SHELAA's, paragraph 09.08 of the Reg 19 JLP (sic) and other documents forming part of the JLP or its evidence base.

## Landscape

- 6.19 Nigel Cowlin Associates (NCA) is a practice of Chartered Landscape Architects. They have been retained by Thorcross Builders Limited to prepare the development zoning plans taking in to account landscape and other constraints.
- 6.20 NCA indicate on the development zoning plans, that ‘the proposals and strategy taken have been led by consideration of landscape and visual sensitivities as well as other related matters, such as proximity to the Area of Outstanding Natural Beauty (AONB) and Holbrook Gardens parkland landscape to the east and the County Wildlife Site (CWS) to the south. This was informed by desk and field study exercises carried out by experienced landscape architects.’
- 6.21 In respect of *Development Zoning Option 1*, NCA explain the landscape strategy of the scheme as follows:

The proposed development area would occupy the most contained portion of the site, where it would lie closely related to the existing settlement pattern inbetween and adjacent to existing village housing and with main road access. This is a location where development could be readily accommodated and contained with some simple planting mitigation along the eastern boundary. A regular 20-30 dwellings per hectare development density is proposed in this area.

Within the site the existing triangular plantation would be retained and could be managed as a community woodland. Gradual thinning of the conifers in favour of the existing subordinate population of maturing native deciduous trees could provide a more attractive woodland of greater amenity and biodiversity value in the long term.

The footpath through the site could be realigned to take a more rational route through the site. This could take an attractive route alongside and allowing access to the existing plantation woodland. It would pass around the edge of the development rather than through it and would return to connect with the rest of the local footpath network in the north-east corner of the site.

The remaining eastern area of the site is retained as undeveloped in this option. This area would be retained in agricultural cultivation. The north-eastern area of the site is the most visually exposed in views from the north and across the valley to the north-east. Many footpaths cross this area and the views back to the south-west are attractive and verdant. Keeping development back from the northeast part of the site, together with a planted enclosure to the east of the development area, would provide an attractive edge and would preserve the character of the area.

The north-eastern area of the site is the most visually exposed in views from the north and across the valley to the north-east. Many footpaths cross this area and the views back to the south-west are attractive and verdant. Keeping development back from the north-east part of the site, together with a planted enclosure to the east of the development area, would provide an attractive edge and would preserve the character of the area.

6.22 In respect of *Development Zoning Option 2*, NCA explain the landscape strategy of the scheme as follows:

Development Area 1 would occupy the most contained portion of the site, where it would lie closely related to the existing settlement pattern inbetween and adjacent to existing village housing and with main road access. This is a location where development could be readily accommodated and contained with some simple planting mitigation along the eastern boundary. A regular 20-30 dwellings per hectare development density is proposed in this area.

Development Area 2 would occupy a second area set back to the south-east. This area is away from the most visually exposed portion of the site, which is to the north-east, and lies within a more recessive location to the south-east. Here a landscape dominated and low-density approach is proposed so that it would not harm the setting of the AONB and to allow the built form to blend into the landscape. This approach would be designed to provide an informal rural style of development consisting of widely spaced properties framed with lots of greening and additional tree cover.

Within the site the existing triangular plantation would be retained and could be managed as a community woodland. Gradual thinning of the conifers in favour of the existing subordinate population of maturing native deciduous trees could provide a more attractive woodland of greater amenity and biodiversity value in the long term.

The footpath through the site could be realigned to take a more rational route through the site. This could take an attractive route alongside and allowing access to the existing plantation woodland. It would pass around the edge of the development rather than through it and would return to connect with the rest of the local footpath network in the north-east corner of the site.

An open space, perhaps wildlife area for ecological mitigation, is indicated for the north-east portion of the site. This is the most visually exposed area in views from the north and across the valley to the north-east. Many footpaths cross this area and the views back to the south-west are attractive and verdant. Maintaining open space in the north-east part of the site, together with some parkland style tree planting enhancement and a planted enclosure to the east of the main development area, would provide an attractive edge and would preserve and enhance the character of the area.

6.23 The Development Zoning Options have therefore have therefore been properly and professionally assessed in landscape terms and should provide the LPA with confidence that either option will be suitable in terms of potential landscape impacts.

6.24 Furthermore, the council's Heritage and Settlement Sensitivity Assessment (March 2018) notes the Key Views towards, through, across and away from the settlement, as follows:

1. *View looking north-west along High Street showing the terraced properties visible on the first edition Ordnance Survey map.*
2. *From the Church looking south to the mill and over the river valley, which highlights the siting of the church above the river valley.*

3. From the Church to the east over the Holbrook Gardens, which allows the best understanding of the form and extent of the historic gardens

4. From the mill looking north towards the Church, again highlighting the prominent siting of the church.

6.25 The Land east of Ipswich Road Holbrook does not affect any of these key views.

6.26 The council's Heritage and Settlement Sensitivity Assessment (March 2018) makes the following recommendation for Holbrook:

*The church is located on a promontory overlooking the river valley with landscaped gardens to the east. This landscape is significant in its own right and makes an important contribution to the significance of the church. The Local Authority should therefore seek to avoid development in this area. **The rest of the surrounding landscape is of lower value** and less susceptible to development, except where it makes a contribution to the setting of outlying farm complexes. Within the core of the settlement several of the listed buildings are larger properties of higher status and this is reflected in their large plots, which should be protected from infill or backland development.*

6.27 The suggested development options can comply with these recommendations.

6.28 The Assessment comments in more detail as follows:

*The area to the east of the settlement is formed of the historic parkland, which would be harmed by intrusive development which did not allow for the retention of the clear separation between the parkland and the settlement.*

6.29 There is no qualification or analysis to back up this assertion. It is not understood what is meant by 'intrusive' development and whether sensitive, low density development would be acceptable. Notwithstanding, it will be noted that Option 1 retains a large gap (ie 'Clear Separation') to Holbrook Gardens to the east. Also, Option 2 includes a significant amount of retained undeveloped land and merely 8 houses on a one hectare site to provide a low density approach which would not harm any 'key views' (sic) or be insensitive to Holbrook Gardens, which are well vegetated.

6.30 The LPA has included a Landscape Sensitivity Assessment of SHELAA Sites (September 2020) as part of its evidence base. This only assesses the Reg 19 JLP proposed 7 unit allocation on the Promoted Land to its western part. The reported Landscape sensitivity score for this site is assessed as 'Low'.

### Highways and Access

6.31 Journey Transport Planning Ltd has been retained to advise on highways and access matters. Their assessment of the proposed housing allocation is set out in the submitted 'Access Appraisal' dated November 2017. The report considers existing highway information, safety & accident records, the access proposal and the site's sustainability.

6.32 The summary of the Access Appraisal states:

The proposal site has been assessed in the context of vehicular access and sustainable connections to the local area.

Access to the site can be provided in accordance with current design standards and would provide a suitable level of vehicular access to the site without compromising highway safety or capacity in the vicinity. Safe pedestrian access connecting into the existing footway network to the site can be achieved with the proposed access arrangements.

The site is in a very sustainable location within the village and is in an excellent location in terms of providing opportunities for access via means other than the private car.

In consideration of the foregoing, a residential allocation on the site for at least 60 units could be accommodated without having a detrimental impact in terms of either highway safety or capacity.

6.33 It is therefore clear from the professional advice that the proposed housing allocation would be suitable in highways and access terms at this site.

6.34 Furthermore, the Access Appraisal stated access requirements as follows:

*In accordance with the requirements for access to residential developments as set out in the Suffolk Residential Design Guide; in order to accommodate around 60 dwellings on the site, a minor access road with a 5.5m wide carriageway and two 1.8m wide footways would be suitable to serve the site and accommodate the movement requirements of up to 100 dwellings in a cul-de-sac form*

6.35 These have now been demonstrated as deliverable given the recent approval of an access as part of the planning permission for the 7 unit housing scheme. Therefore, the access as now approved by the LPA, which meets Suffolk CC highway authority standards (and is in accordance with the design recommendations by the highway consultant) will easily be able to accommodate the levels of housing development envisaged in the two Options, suggested at between 34 and 59 units. As this access is now approved and will occur, this provides more reason in highway (and visual) terms to positively consider allocation of the wider parcel of land. It is *deliverable* in access terms and this is a key aspect of whether to allocate land for development.

### Drainage

6.36 GH Bullard & Associates have been retained to advise on drainage issues. Their submitted report is entitled Flood Risk Assessment and Drainage Strategy (Nov 2017).

6.37 The report's summary in respect of flooding is as follows:

The risk of flooding to the site can be generally described as Very Low. Table 2.1, below, summarises the probability of the site flooding from the five key sources of flooding.

The EA accepts that extreme floods will happen, and it will never be possible to eliminate flood risk altogether. The risk of flooding to the site has been adequately

considered for outline purposes and therefore development of the site does not pose in principle an unacceptable flood risk to occupants of the site.

Source	Description	Risk	
Fluvial	Rivers	Flood Zone 1	(>1%)
Tidal	Seas		
Pluvial	Surface Water	Very Low	(>1%)
Groundwater	Aquifers	Very Low	(<0.1%)
Infrastructure failure	Reservoirs	Very Low	(negligible)
	Blocked Sewers		

Table 12.1 – Flood Risk Summary

6.38 The report sets out a drainage strategy in accordance with the SuDS Hierarchy and Building Regulations. The following points, inter alia, are stated:

- The nearest borehole records TM13NE42 records sand and gravel to a depth of 9.9 mBGL. An indicative infiltration rate based on the recorded soil type would be 1x10<sup>-5</sup> m/s. In principle, this is sufficient for discharge into the ground, however, the infiltration rate will need to be confirmed by infiltration testing to BRE365 prior to the submission of an Outline Planning Application.
- Should confirmed infiltration rates prove to be favourable, individual plots will be drained to individual soakaways and private drives will be designed as permeable pavements. Proposed adopted highways will drain to individual soakaways located in areas of public open space at the lowest points of the site
- Should confirmed infiltration rates prove to be favourable, individual plots will be drained to individual soakaways and private drives will be designed as permeable pavements. Proposed adopted highways will drain to individual soakaways located in areas of public open space at the lowest points of the site
- Should confirmed infiltration rates prove to be favourable, individual plots will be drained to individual soakaways and private drives will be designed as permeable pavements. Proposed adopted highways will drain to individual soakaways located in areas of public open space at the lowest points of the site
- There is a 150 mm diameter public foul sewer in Ipswich Road that is proposed as the connection point subject to capacity. Capacity will need to be confirmed by an Anglian Water

6.39 In summary, the site is located in Flood Zone 1 and does not pose, in principle, an unacceptable flood risk. Further detailed work is required to identify the precise details of the drainage scheme, which can follow at application stage.

6.40 The Holbrook Parish Meeting on 30 October 2017 (**Appendix 7**) raised concerns about impacts on natural drainage systems and potential detriment to the stream behind houses in Ipswich Road. However, the Flood Risk Assessment and Drainage Strategy does not raise any in

principle concerns with drainage. Further 'fine grain' technical issues can be addressed fully at a detailed stage.

## Ecology

6.41 T4 Ecology Ltd has been retained to provide ecological advice on the potential development of the site.

6.42 A Phase 1 Habitat Survey has been carried out and an assessment made of the two development options. The submitted letter dated 8<sup>th</sup> November 2017 from T4 Ecology Ltd sets out a summary of findings and recommendations of the Phase 1 report.

6.43 In respect of ecological designations the advice states the following:

The statutory and non-statutory designation search undertaken as part of the desk study identified that the site is not situated within any statutory or non-statutory designated location. The Stour & Orwell Estuaries Special Protection Area (SPA) and Ramsar site at its closest point is situated approximately 1.8km to the south. Existing recreational activities within the SPA cause disturbances to birds, and additional visits/visitor pressure as a result of additional housing could add to such pressures. Given the location of the site in close proximity of the SPA, any development (Options 1 and 2) will have to give specific consideration as to how potential impacts of leisure upon the SPA would be managed.

The whole site survey area is bounded by Holbrook Gardens County Wildlife Site (CWS) at the south-eastern corner. In respect of development Option 1, given relative distance (approximately 250m) and that according to the available plans the field in the eastern section of the site would remain in arable use, Option 1 would be considered unlikely to result in adverse impact upon the CWS provided the suggested eastern boundary planting and plantation woodland enhancement measures as illustrated on the drawing are implemented as part of a wider package of enhancements.

In respect of Option 2, given the closer proximity of proposed development to the CWS, it is advised that in order to manage and ultimately enhance the offsite CWS, a buffer zone should be created in the south/south east of the proposed Option 2 site. Such a buffer zone should comprise habitats that would be complementary to those already present within the CWS such that the CWS is fully protected and enhanced as a result of development. Implementation of this and other initiatives should be included within any future Environmental Management Plan (EMP) for the site. In addition, given the close proximity of the CWS to the site, it is advised that a detailed, site specific Construction Management Plan (CMP) should be produced by the developer to manage the construction phases in Option 2.

6.44 The advice also states, inter alia, the following:

- boundary trees/hedgerows should be retained; woodland to be retained; new planting to be considered

- the site presents a relatively limited potential habitat for farmland birds; opportunities for nesting birds could be considered; improve habitats through new planting
- consideration of bats is required eg surveys, especially in option 2
- not considered reasonably likely that great crested newt would be adversely affected by either the Option 1 or 2 proposals
- in respect of Option 1 it is unlikely that reptiles would be present in any number; the site provides poor potential overall habitat
- In respect of Option 2, reptile surveys have been advised; assessment/appropriate mitigation would be determined following these
- further survey should be undertaken to determine badger use on/in the immediate vicinity of the site
- the site is unlikely to support significant assemblages or rare or noted invertebrates.; no further surveys are considered to be necessary or appropriate
- with regard to both Options 1 and 2, it is advised that a full detailed scope of ecological enhancements be included within any future EMP prepared in respect of the site
- the site is not situated in a location, nor provides potentially suitable habitat/has connectivity to habitat where other protected species such as water vole, hazel, dormouse and otter would be considered at risk. No further surveys/precautions are considered necessary or appropriate

6.45 The detailed proposals and layouts will take account of this advice. However, there is no overriding constraint in ecological terms to the development options as long as the advice is properly responded to and appropriate mitigation strategies employed. It will be noted that in the Development Option 2 that a buffer zone to the southernmost part of the site is indicated. This also connects via green corridors to a potential new wildlife area at the north east of the site.

6.46 Subsequent to this advice the council's Habitats Regulations Assessment (HRA) including Appropriate Assessment (October 2020) notes that the allocated site LA068 *'is situated within the SSSI ZOI for ticked Habitats Sites. Therefore, the policy must be screened in, as there is potential for LSE without mitigation. Water and air pollution; recreational disturbance'*. However, it also advises that there would be *'No adverse effects on site integrity to identified Habitats sites with mitigation embedded'*.

6.47 The HRA Report concludes that *'this HRA report including Appropriate Assessment indicates that the Babergh & Mid Suffolk Districts Joint Local Plan is not predicted to have any adverse effect on integrity (AEOI) on any Habitats Sites, either alone or in combination with other plans and projects'*. There is little reason to suspect that a modification to the JLP to include housing on the remaining part of the Promoted Land (which is arable farmland) either as an additional or substituted (ie swapped) housing allocation, would have negative impacts the integrity of Habitats Sites as assessed in the HRA.

## Heritage

6.48 Barry Hillman-Crouch has been retained to advise on heritage matters. He has produced the submitted Heritage Statement dated 9<sup>th</sup> November 2017. Research has been carried out regarding heritage matters, assessing listed buildings and archaeological issues, allowing conclusions to be reached regarding potential impacts.

6.49 The summary of the Heritage Statement cites the following:

The site is not within the Conservation Area.

There is only one Listed Building nearby called The Beeches (IoE Number: 277450). It is on the other side of the road set well back behind fully grown trees and a solid fence. There will be no impact on it at all.

The area proposed for development has no archaeological activity associated with it. An extensive aerial study by Helen Saunders of Essex County Council indicates that while there was a substantial prehistoric settlement to the NE it did not extend into the development area. No other finds or features have been recorded.

The first three editions of the Ordnance Survey show a row of four small buildings with a marked well sitting in the rectangular plot to the west. These do not appear on the 1945 Aerial Survey or subsequent Ordnance Survey Series.

Based on the available evidence there will be no adverse impact on archaeological deposits or historic buildings.

6.50 From this professional advice it is clear that there is no impediment to a housing allocation on grounds of heritage constraints.

6.51 Furthermore, the council's Heritage and Settlement Sensitivity Assessment (March 2018) states that:

*There are a small number of important listed buildings within the boundary of the settlement, including the highly significant parish church. These along with Holbrook Gardens to the east are of high value. The majority of the settlement is of modern origin and the settlement as a whole is of low value. The complex of buildings associated with the Royal Hospital School, located to the south are of high value, but do not have a visual and physical association with the settlement.*

6.52 Holbrook is only one of three settlements assessed in Babergh with a 'low' overall heritage and settlement sensitivity rating. This indicates that the site on Land East of Ipswich Road Holbrook is potentially suitable in these respects. Either of the suggested options for the subject site would not impose unduly on any listed buildings or other areas of value such as Holbrook Gardens or the Royal Hospital School.

6.53 The council's commissioned Heritage Impact Assessment for Local Plan Site Allocations Stage 1: Strategic Appraisal (October 2020) indicates for the allocated part of the Promoted Land ref LA068 that, "There are no non-designated assets within the site. Post-medieval Holbrook Gardens is recorded 210m east of the site; potential visible setting change. There are no designated assets within the site. The 18th century Beeches GII listed building (1036869) was located 50m south-west of the site; potential visible setting change, though this would require further assessment."

6.54 Given the advice from Barry Hillman Crouch, as well as the Reg19 JLP allocation at site ref LA068, it is clear that development on the western part of the Promoted Land is capable of being acceptable in terms of impact upon the setting of The Beeches listed building. This is now further confirmed by the extant consent for the 7 dwellings at the site granted by the LPA. Development west of the allocated land on the remainder of the Promoted Land, being further away would not therefore affect the setting of The Beeches. Impacts upon Holbrook Gardens have been assessed by landscape consultants NCA in their assessment, which has led to the development options now promoted.

### Infrastructure

6.55 Holbrook is a Core Village and has numerous facilities consistent with that status. There are two points which arise regarding the village's infrastructure.

6.56 Firstly, it is important that facilities and services are retained. This will depend on ensuring that there will be enough population in the village to ensure consistent use and therefore viability of any valued facilities in the longer term. Much of the housing in Holbrook comprises detached/family housing, with little in the way of starter units (private or shared ownership) for younger people/couples trying to get on the housing ladder. This group will most likely need to move out of the family home (creating under-occupied family homes), leaving the village to live in other settlements eg Ipswich which may be better able to cater for their housing needs as Holbrook will not provide suitable housing in the future due to the insignificant growth proposed by the council.

6.57 Also, the demographic projections show a growing elderly population. Without adequate additional specific provision in Holbrook for the elderly eg bungalows (eg for downsizing) or care homes, many of this age group may need to find specialist or age-appropriate accommodation outside of the village. The more active elderly will contribute to keeping facilities economically viable. The less active/less able elderly who remain in Holbrook and are cared for at the family home in Holbrook, will contribute less to village facilities over time eg as they become more house bound and so are unable to use the bus service, pubs, etc.

6.58 Given these circumstances, existing village will - over the 19 year life of the Plan – gradually suffer an economic decline as a number of villagers who currently contribute financially to keeping village facilities viable will no longer be able to do so. The NPPF supports the retention of viable village facilities and as such it is necessary to provide the village with additional population via the making of appropriate housing allocations in the JLP to the period 2037.

6.59 Secondly, it is important to recognise that villages need to grow, not only to sustain existing facilities but also to help improve them or create new ones. There is therefore a positive double effect of adding new population to Holbrook.

6.60 The Reg 19 JLP is informed by the Babergh and Mid Suffolk Infrastructure Delivery Plan dated October 2020 ('IDP'). At the introduction, the IDP explains, "*The Councils fully appreciate that the delivery of new homes and jobs needs to be supported by necessary infrastructure, including a wide range of transport options, utilities, and community facilities. Indeed, enabling the provision of the necessary infrastructure to support residents, businesses, communities, the environment and individuals. Prioritising investment into strategic services and infrastructure*

*are key objectives of both Councils. Without appropriate infrastructure, the growth would be regarded as unsustainable.*

- 6.61 From the underlined text above, it is clear that the IDP is being therefore used to support the council's proposed housing growth plans. Therefore it is not necessarily being used as a tool to evaluate existing settlement facilities and what growth is required to maintain these.
- 6.62 The IDP cites NPPF paragraph 104 which states: *'Planning policies should a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities'*.
- 6.63 In this context, where development is proposed in the Shotley Peninsula, Holbrook is best placed for a suitable housing allocation, being the largest single settlement therein and being provided with the greatest amount of facilities as evidenced by its points score in the SHR.
- 6.64 Holbrook has a secondary school (Holbrook Academy) which is the only state secondary education facility (and centrally located) on the Shotley Peninsula. The IDP assesses the potential expansion of Holbrook Academy. A feasibility report indicates that its capacity could expand from 600 pupils to 800 pupils but at a cost of approximately £4.755 Million. The IDP at page 168 indicates that such expansion is an 'Essential' priority. However, there is not sufficient funding for this expansion (funding gap noted as 'TBC') and it is questionable whether Suffolk CC would want to expand this facility given the lack of housing growth currently proposed by the Reg 19 JLP in Holbrook and in the Shotley Peninsula generally.
- 6.65 The IDP states the potential funding gap could be made up by Suffolk CC from future CIL development, although very little funding will emerge from CIL related development in Holbrook. Accordingly, it is suggested that some of the shortfall could be addressed by allocating a reasonable amount of housing in Holbrook, as per the Options now presented by Thorcross Builders Limited. Indeed such greater housing allocation for the village would be logical and justified to address the terms of NPPF Paragraph 104 (minimise length and number of journeys for education) such that additional pupils generated from new housing in Holbrook can simply walk or cycle to Holbrook Academy. By contrast the secondary school children generated from the 50 unit allocation at Shotley Street who attend Holbrook Academy will have much longer journeys, likely by motorised transport.
- 6.66 Holbrook Academy also has a sports centre which is available to the general public. The IDP (at Table 33 and page 123) indicates that Holbrook Academy is one of several Secondary Schools where additional provision of sporting facilities could benefit the pupils and residents, resulting from growth in the JLP. The IDP at page 123 identifies a 'desirable' Project for Holbrook Academy as follows, *"To extend sports and recreation facilities available for community use"*. The IDP cites its Evidence as a *"Strategic level sporting centre with indoor & outdoor sports"*. The indicative cost of this project is £100,000 and includes CIL and section 106 contributions from potential JLP allocations. Other less certain funding mechanisms eg Sports England grant, National Lottery funding, are also referenced, which brings in to doubt the delivery of this infrastructure under the Reg 19 JLP s proposals.
- 6.67 Page 154 of the IDP notes as 'Essential' a project to expand pre-school places at Holbrook. The estimated cost is stated as 'unknown', although £7500 CIL funding was stated in the

predecessor IDP 2019. A much greater allocation in the village than the 7 unit housing allocation will provide more ability to make a meaningful CIL contribution to pre-school places.

- 6.68 Table 7 of the IDP lists (at Page 26) Holbrook Primary School and indicates that it is not planned to expand in relation to the Joint Local Plan growth which is unsurprising given the negligible proposals for new housing in this Core Village.
- 6.69 However, it will be important to ensure that there are sufficient numbers of pupils forecasted in the future to ensure this school remains viable, noting the distinct lack of housing allocations in Holbrook and the Shotley Peninsula generally for the period to 2037. This comment also applies similarly to Pre-Schooling and the Holbrook Academy.
- 6.70 The IDP (page 143) makes an Open Space Assessment for Holbrook. It reveals that Holbrook is deficient in space for allotments, amenity green space and play space for children. The Reg 19 JLP makes no plans to resolve these deficiencies. Rather it will be left to assessing rival projects bidding for CIL funding. The growth options presented by Thorcross Builders Limited for Holbrook could potentially address these deficiencies by providing allotments, play space and other required open space on the land forming part of their proposals. The woodland to the south-west part of the subject site is not currently open to the public but could be made so as part of a housing site allocation.
- 6.71 The IDP (pages 147) notes two 'Green infrastructure and open space improvements projects' in Holbrook where section 106 funding exists. These are:
- Holbrook Sports Centre - £10,120 s106 allocated to Exacom Project 629 to resurface tennis/netball courts (Astro Turf Refurbishment) by March 2021
  - Reade's Field - £8,347 s106 allocated to Exacom Project 630 to improve outdoor sports provision at Reade's field by March 2021
- 6.72 It is not clear whether the s106 funding is sufficient or just a partial contribution towards the total project cost. In respect of Reade Field there is a new pavilion proposal and should the s106 allocated funding be dedicated for this project, it is likely to be insufficient on its own. Suitable housing allocations at Holbrook could address shortfalls in funding for these local projects.
- 6.73 Page 173 of the IDP notes funding mitigation may be needed for Holbrook and Shotley GP Practice, as well as funding for initial plans to expand Shotley Surgery. These are described as an 'Essential' project but of unknown cost (NB – The predecessor IDP quoted £150,000 funding is required). Current funding is stated as 'unknown' and funding sources are stated (albeit without any evidence) as NHS funds and developer contributions from committed growth and from JLP growth. This funding position must be clarified and it may be the case that additional housing at Holbrook would address to some extent any possible funding shortfall if it exists.
- 6.74 Whilst a little dated, a document entitled the Holbrook Action Project Report (2005) (**Appendix 6**) set out a number of issues concerning infrastructure identified by local residents. The Inspector and Babergh DC should take in to account any outstanding issues of infrastructure referenced in this document.

6.75 Thorcross Builders Limited therefore advocates that greater housing allocations are made in Holbrook to address infrastructure funding. The proposed JLP allocation of 7 units on their land (LA068) is insufficient in terms of seriously assisting the longer term retention of facilities and services, let alone allowing for improved, expanded or new facilities. Greater numbers of long term population are required which will arise from a more meaningful housing allocation.

6.76 Using the suggested options herein for the Land east of Ipswich Road, Holbrook, there would be a reasonable but sustainable population increase providing custom to help sustain and enhance local facilities and services. There would also be significant CIL payments generated to put towards improving existing infrastructure and adding new facilities. Potential CIL payments generated are shown below.

Developer Option	Suggested No. of Dwellings	Private Dwellings (65% of total)	Total Additional Population Arising*	Potential CIL Payment using current rate @ £115/sqm**
Option 1	34 to 51	22 to 33	78 to 117	£253,000 (22 private homes) £379,500 (33 private homes)
Option 2	42 to 59	27 to 38	97 to 136	£310,500 (27 private homes) £437,000 (38 private homes)

\* Assumes 2.3 persons/dwelling

\*\* Assumes Average 100sqm GIA, CIL payments from private units only & without indexation

6.77 From the above analysis, the potential CIL payments (which are “current” rates and exclude indexation allowance, so may be higher in practice) from the developer options could range from an estimated £253,000 to £437,000. This could be directly towards retaining and enhancing facilities and services in Holbrook, as part of a sustainable NPPF compliant long term strategy for the village. The Reg 19 JLP has failed in these respects.

## 7.0 SUMMARY AND CONCLUSIONS

- 7.1 The Reg 19 JLP states that Core Villages should be a focus for development. These villages are an important part of the settlement hierarchy particularly as they provide facilities and services which need to be maintained in the longer term. Some important Core Villages, such as Holbrook, which is the largest single settlement on the Shotley Peninsula, are proposed with either no or no meaningful housing allocations in the JLP Plan period until 2037. This puts the longer term retention of village facilities at risk and is contrary to NPPF sustainability objectives.
- 7.2 The Reg19 JLP uses a subjective scoring system within the SHR to determine and evaluate which villages are worthy of Core Village Status. This has resulted in the questionable determination of certain fringe village's being awarded Core Village status. Holbrook in contrast should have been awarded a higher score, potentially putting it on a par with Capel St Mary, which is one of only a small number of villages receiving a substantial amount of housing growth, this not being "proportionate" to its range of services and facilities, contrary to the Reg19 JLP Objectives.
- 7.3 Furthermore, numerous lower order settlements including Hinterland Villages and Hamlets are proposed in the Reg19 JLP to receive greater allocations than Holbrook. This defeats the objective of having a tiered Settlement Strategy whereby larger settlements receive a proportionately higher housing allocation.
- 7.4 Holbrook's proposed housing allocation of 7 units will be ineffective as a means to sustaining the long term viability of facilities and services in this Core Village. Furthermore, the site already has planning permission and no affordable housing will be derived from the allocation.
- 7.5 For these key reasons the Reg19 JLP is not 'Sound'. It is neither justified nor compliant with the NPPF.
- 7.6 Accordingly the Inspector should consider a more suitable housing allocation for the Core Village of Holbrook, particularly to assist growth and infrastructure objectives. This will bring some degree of balance to the housing distribution strategy.
- 7.7 The whole of the subject site on *land East of Ipswich Road, Holbrook* is well located within the village, adjacent to existing housing, village facilities and can be accessed from the main road via an approved access.
- 7.8 A careful assessment of the site has been carried out. Two development options have been put forward, which in total would range from 34 dwellings to 59 options, dependent on the option chosen and the density applied. In the larger option (or a hybrid option) there is scope to provide around 20 affordable dwellings. The 2017 SHELAA had indicated a site capacity of 30 dwellings at this site. The 2020 SHELAA reduces this to 7 dwellings, merely concerning the western frontage of the Promoted Land. There is a lack of evidence in the council's assessments to indicate that the LPA has analysed either at all or robustly the whole of the Promoted Land. The only reason given by the LPA to restricting the allocation to 7 dwellings is to avoid a "disproportionate" addition to the village but there is no evidence that this would occur. There are no overriding constraints to a making a suitable residential allocation of the Promoted Land.

- 7.9 Professional reports have been obtained regarding landscape, access, ecology, drainage and heritage. As far as can be shown at this stage, the proposed housing development of the land East of Ipswich Road, Holbrook would be able to accommodate identified constraints or requirements that are highlighted by these reports.
- 7.10 A suitable allocation would provide significant CIL contributions towards local infrastructure which the council's own documents indicate is essential or desirable, as well as and address village housing needs, especially concerning the elderly and starter homes for which no provision is made in Holbrook.
- 7.11 Modifications to the JLP are therefore sought to ensure an appropriate housing allocation is made on land East of Ipswich Road, Holbrook, suggested to be up to 59 units, in order to make the Plan sound.

## **APPENDIX 1**

### **Holbrook Facilities Map**

# HOLBROOK FACILITIES MAP (December 2020)

**KEY TO FACILITIES**

**Community**

1. Village Hall
2. Methodist Church
3. All Saints Church
4. Care Home
5. Fire Station

**Plus:**

- Mobile Library
- Super Fast Broadband

**Education**

6. Holbrook Academy
7. Holbrook Primary School
8. Holbrook Pre-School

**Health**

9. Doctor's Surgery with dispensary

**Plus:**

- Dentist at Royal Hospital School (off map)

**Recreation & Leisure**

10. Recreation Ground & Play Area
11. Peninsula Sports Centre
12. Bowls Club

**Plus:**

- Alton Water (off map)

**Food & Drink**

13. The Swan PH
14. The Compasses PH

**Plus:**

- Mobile Fish & Chip Van
- Mobile Pizza Maker

**Retail**

15. Co-op Convenience Store with Post Office & ATM
16. Butchers

**Plus:**

- Mobile Hairdresser

**Transport**

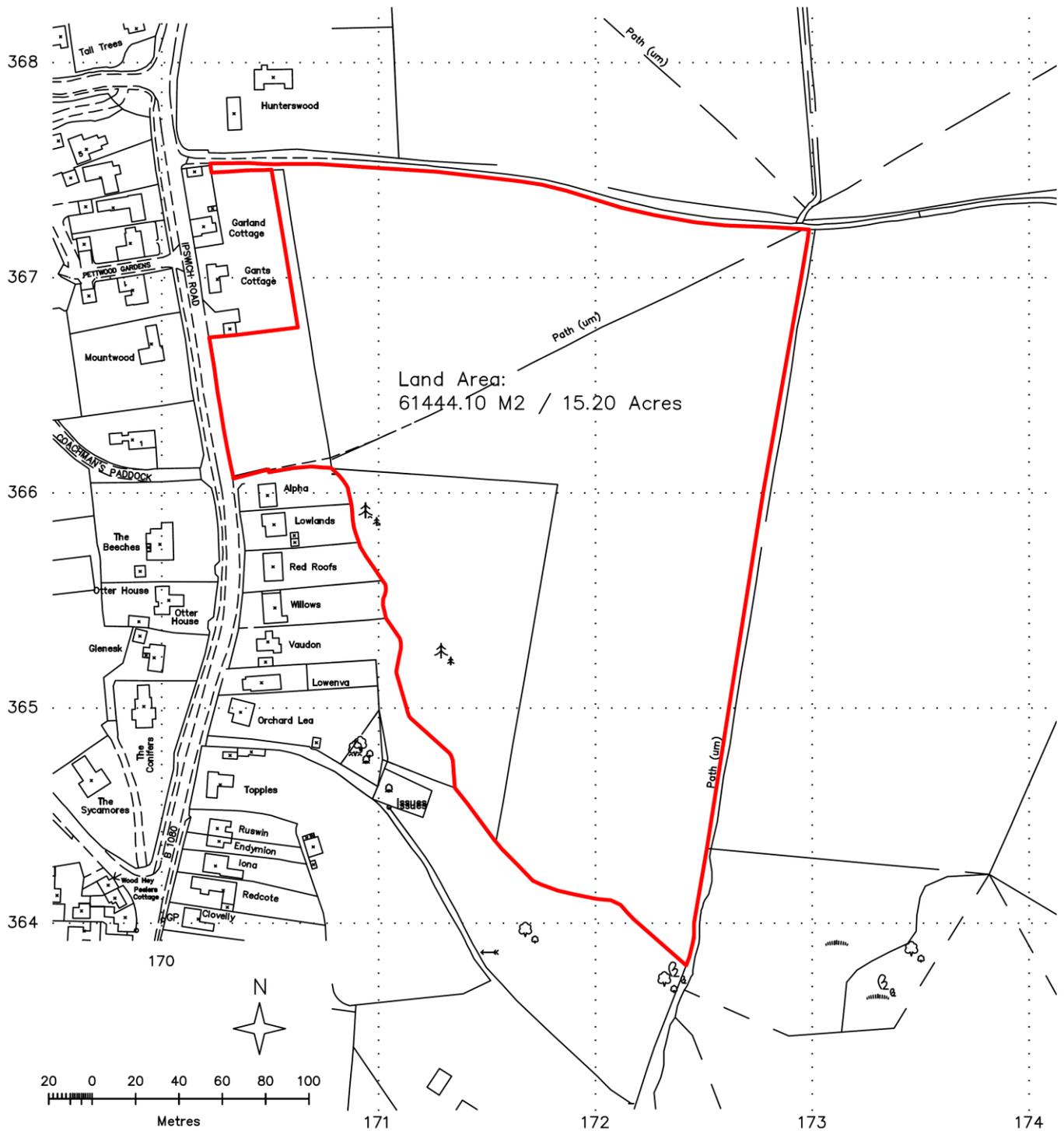
17. Bus Services, with daily peak-time services to Ipswich & Manningtree (and mainline railway stations for London, etc)



Approximate Scale (m)

## **APPENDIX 2**

### **Site Plan – Land East of Ipswich Road, Holbrook**



Job Title	<b>LAND EAST OF IPSWICH ROAD HOLBROOK, IP9 2QT</b>	Drawn	<b>Oct. 2017</b>
Dwg Title	<b>LOCATION PLAN</b>	Scale	<b>1:2500 @ A4</b>
		Drawing No. 	
Mulberry, Hadleigh Road, East Bergholt Colchester, Essex, CO7 6QT Tel: 01206 299493 Email: ag.homes@btconnect.com			

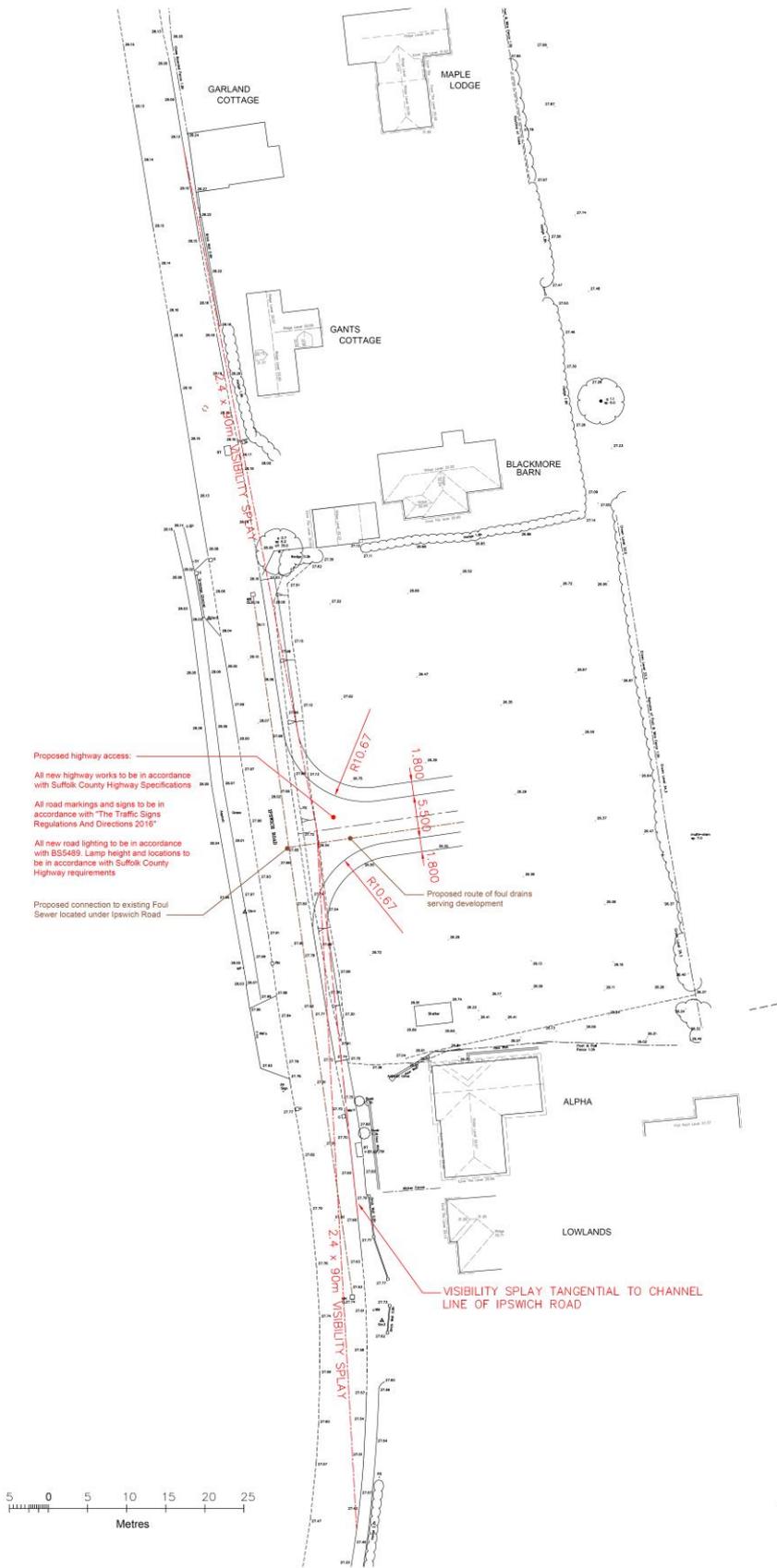
Do not scale from this page – use original plan



Site (edged red) shown in context to housing and built up part of village

## **APPENDIX 3**

### **Approved Access Plans**



REV: A - Foul sewer details added to site plan - Oct 2018

This document was prepared by Thorcross Builders Ltd on behalf of Plan Build Services and shall not be reproduced without written consent from the copyright owner. All dimensions are rounded to the nearest millimetre.

Job title: PROPOSED RESIDENTIAL DEVELOPMENT  
 LAND EAST OF IPSWICH ROAD  
 HOLBROOK, IPS 2QT

Client: THORCROSS BUILDERS LTD

Dwg title: PROPOSED VEHICULAR ACCESS



<b>PLAN BUILD</b> <i>Services</i>	Mulberry, Hadleigh Road East Bergholt, Colchester Essex, CO2 9QT Tel: 01206 299491 Email: info@planbuild.co.uk
	Drawing number: <b>TH52/03<sup>A</sup></b>
Date: JAN 2018 Scale: 1:250 @ A1	

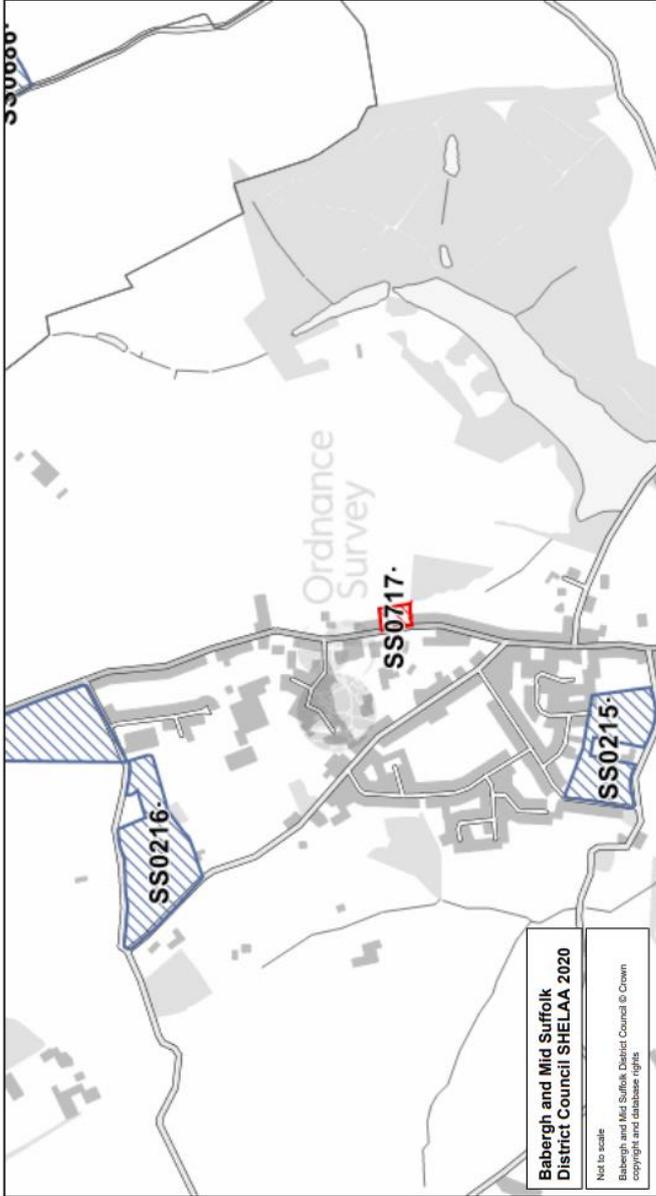
Plan of approved access which is able to serve the subject site



Plan of approved access and indicative 7 unit housing scheme

## **APPENDIX 4**

### **2020 SHELAA Map - Holbrook**



Suitable SHELAA Sites



Unsuitable SHELAA Sites



## **APPENDIX 5**

### **Sustainability Appraisal 2020 Site LA068 Holbrook**

### Major Positive

**E.227** Site SS0717 (Land east of Ipswich Road, Holbrook) is expected to have a major positive effect in relation to criteria 1a (GP surgeries), 1b (Open space, sport and recreation) and 1c (Public Rights of Way) because it is within desirable walking distance of a GP surgery, an open space, sport and/or recreation facility, as well as open country and/or registered common land, in addition to at least one PRoW. Therefore, it is likely to improve the health and wellbeing of the population, as well as maintain and improve the levels of education. However, the effect against 1c (Public Rights of Way) is recorded as uncertain because development could result in the loss or diversion of the PRoW.

**E.228** Site SS0717 (Land east of Ipswich Road, Holbrook) is expected to have major positive effects in relation to criteria 2a (Primary schools) and 2b (Secondary schools) because it is within desirable walking distance of a primary and secondary school.

### Major Negative

**E.229** Site SS0717 (Land east of Ipswich Road, Holbrook) is expected to have major negative effects against criteria 16a (Rail), 16c (Cycling), 3c (Centres of employment) and 15a (Town and district centres) because they are located beyond the preferred maximum walking distance to railway stations and cycle ways, in addition to strategic employment sites/enterprise zones and town/district centres. Therefore, development is unlikely to encourage active travel and uptake of more sustainable modes of transport. Additionally, a major negative effect is expected against criterion 2c (Further and higher education facilities) for this site because it is located beyond the preferred maximum walking distance of further and higher education facilities.

**E.230** Site SS0717 (Land east of Ipswich Road, Holbrook) is likely to have major negative effects against criteria 7a (Brownfield/greenfield land) because it is categorised as greenfield land, and 7b (Agricultural land classification) because a significant proportion of the site falls on Grade 2 agricultural land. Therefore, it does not make efficient use of land or contribute towards the conservation of the best and most versatile agricultural land.

**E.231** Furthermore, the site falls within 250m of Holbrook Gardens County Wildlife Site. Therefore, a major negative effect is expected in relation to criterion 11b (Locally designated biodiversity assets, priority habits and ancient woodland). However, this effect is uncertain depending upon whether potential negative effects can be mitigated. The site is also expected to have a major negative effect against criterion 6a (AQMA) as it is located within 12.5km of an AQMA and could exacerbate existing air quality issues.

### Conclusions

**E.232** Overall, site SS0717 (Land east of Ipswich Road, Holbrook) performs relatively positively because it falls within desirable walking distance of a GP surgery, an open space, sport and/or recreation facility, in addition to open country and/or registered common land, a primary school, a secondary school, and a PRoW. Although the site is located within a SSSI impact Risk Zone and falls within or in close proximity to a Local Nature Reserve, County Wildlife Site and/or priority habitat or ancient woodland, there is potential for these negative effects to be mitigated.

## **APPENDIX 6**

### **Holbrook Action Project Report 2005**

(refer to separate insert/PDF)

## **APPENDIX 7**

### **Holbrook Parish Meeting Notes 30/10/17**

## PARISH OF HOLBROOK - PUBLIC MEETING

Notes from a meeting held in Holbrook Village Hall on Monday 30<sup>th</sup> October 2017 from 7pm to 9pm.

### **HPCLP1710/01 Welcome and introduction from the Chairman of the Parish Council:**

Cllr Ambrose explained that this was not a formal Parish Council meeting; the purpose of the meeting was to collate the views of the large number of residents present on specific parts of the Joint Local Plan prior to the Parish Council submitting its response. Cllr Ambrose invited general comments from the floor but there were none.

### **HPCLP1710/02 What is the preferred option for spatial distribution:**

A discussion took place about the four options and what they might mean for Holbrook. Whilst some felt that whichever option gave the minimum amount of development should be chosen, others suggested that the village needs more growth to remain sustainable for the life of the plan which is twenty years. It was agreed by a show of hands that the County Town-focussed option was preferred.

### **HPCLP1710/03 What housing type does Holbrook need:**

It was agreed that more affordable housing, whether this is lower cost smaller houses for purchase or social housing for rental is required. Also, there is a need for bungalows or other accessible smaller housing that older people can move into and free up family homes. More large houses are not required. There is a general feeling that the village needs to accommodate young people starting out and the elderly.

### **HPCLP1710/04 Do we accept the three sites identified for potential development:**

Woodlands Road: Mr Pawlewski has produced a very detailed report about the Woodlands Road site and believes that it is different to the other proposed sites in a number of ways which he explained to those present. It is seen to be ribbon development and additional to the village envelope rather than being within it. He is happy for the Parish Council to use the report in its response if appropriate.

Ipswich Road: There are concerns about the impact of development on the natural drainage systems with a potential detriment to the stream behind the houses on Ipswich Road. This should be picked up by any environmental impact assessment should a planning application be submitted.

Hyams Lane/Five Acres: The main concerns are about traffic and the road system around the site which would need considerable improvement, and the density of development proposed. A lower density project may be suitable but there are fears that this would translate as a few large houses rather than the smaller dwellings required.

Following considerable discussion and a show of hands for each site, it was agreed by the meeting that the Woodlands Road site should be rejected and that the other two sites may be suitable with appropriate conditions attached.

Overall, there is concern about the road system in the centre of the village, the capacity of the drainage system, the surgery and the schools. There is also concern about the cumulative effect of development across the peninsula with particular pinch points such as Freston Crossroads.

### **HPCLP1710/05 Are there any other potential sites in Holbrook:**

No other sites were suggested.

### **HPCLP1710/06 Do we agree with the proposed new settlement boundary:**

It was felt that the settlement boundary had been ignored previously (i.e. when Admirals Quarter was approved despite being outside the settlement boundary) so the purpose and standing of the boundaries was unclear.

### **HPCLP1710/07 Summary and close:**

Cllr Ambrose thanked all those attending for their interest and input. He encouraged individuals to submit their comments to the consultation process.

Hard copy comment forms will be made available in the Co-op.

Links can be found to the plan and the comments forms on the village website [www.holbrook.onesuffolk.net](http://www.holbrook.onesuffolk.net)

Notes from this meeting will be published on the website and the main noticeboard.



# Access Appraisal

**Land East of Ipswich Road, Holbrook  
November 2017**



Ipswich Road Holbrook  
November 2017

## Quality Assurance

Site name: Ipswich Road, Holbrook

Client name: Springfields Planning and Development

Type of report: Access Appraisal

Prepared by: Fiona Hunter BEng (Hons)

Signed 

Date November 2017

Reviewed By Steve Amann BSc (Hons) MSc (Eng)

Signed 

Date November 2017



## Table of Contents

<b>1</b>	<b>INTRODUCTION</b> .....	<b>1</b>
	Brief .....	1
	Background .....	1
<b>2</b>	<b>SITE ASSESSMENT</b> .....	<b>1</b>
	Existing Information .....	1
	Safety Considerations and Accident Analysis.....	1
<b>3</b>	<b>ACCESS ARRANGEMENTS</b> .....	<b>1</b>
<b>4</b>	<b>SITE SUSTAINABILITY</b> .....	<b>2</b>
<b>5</b>	<b>SUMMARY</b> .....	<b>3</b>

## Appendices

Appendix 1	Site Location
Appendix 2	Proposed Access Arrangement
Appendix 3	Illustrative Site Proposals
Appendix 4	Public Transport Information

# 1 Introduction

## Brief

- 1.1 Journey Transport Planning Ltd has been instructed by Springfields Planning and Development to undertake an Access Appraisal with respect to supporting proposals through the Local Plan process for residential development on land at Ipswich Road, Holbrook.
- 1.2 The site location is illustrated in **Appendix 1**.

## Background

- 1.3 The site is currently open land and this assessment considers the suitability of the site in transport and access terms to accommodate residential development with associated access and parking.

# 2 Site Assessment

## Existing Information

- 2.1 The site is situated to the east of Ipswich Road, near to the centre of Holbrook.
- 2.2 Ipswich Road is a 5.8m wide single carriageway road subject to a 30mph limit as it passes the site.
- 2.3 The road has a system of streetlighting and has the benefit of footways to its western side. There is also a footway to the east side of Ipswich road directly south of the site.

## Safety Considerations and Accident Analysis

- 2.4 The accident record in the vicinity of the site has been examined utilising the highway Authority website, and database indicates no recorded accidents in the latest 3 year period, March 2014-March 2017.
- 2.5 In consideration of the above excellent safety record, an allocation on the site will not have a significant impact on highway safety.

# 3 Access Arrangements

- 3.1 Access to the development has been assessed against current requirements as set out by Suffolk County Council and embodied in the Design Manual for Roads and Streets (DMRB) and considers the potential to provide access to around 60 dwellings on the site.
- 3.2 As a 30mph road any new access onto Ipswich Road will require visibility at 2.4m by 70.0m in accordance with the standards set out in the Design Manual for Roads and Bridges.
- 3.3 An access point to the allocation site can achieve visibility at 2.4m by 70.0m in both directions as per the standards set out in DMRB.

- 3.4 In accordance with the requirements for access to residential developments as set out in the Suffolk Residential Design Guide; in order to accommodate around 60 dwellings on the site, a minor access road with a 5.5m wide carriageway and two 1.8m wide footways would be suitable to serve the site and accommodate the movement requirements of up to 100 dwellings in a cul-de-sac form; the proposed access arrangement is held in **Appendix 2**.
- 3.5 In consideration of the above a safe and appropriate access can be provided to the site for the purposes of residential development and moreover the surrounding connecting highway network is capable of accommodating the additional traffic that could be associated with a residential allocation on the site
- 3.6 The internal layout will need to be designed to ensure that all vehicle entries and exits can be made in forward gear with suitable turning areas for cars being available either within the demise of each plot or within the access arrangement.
- 3.7 As a part of any proposals for the site, a footway would be provided to the site frontage to connect with the existing provision to the south.
- 3.8 Vehicle and cycle parking can be provided in accordance with standards as set out by Suffolk County Council.
- 3.9 Illustrative proposals for the site are held in **Appendix 3**.
- 3.10 The level of traffic that could be generated by the proposals has been considered and 60 dwellings would be likely to generate in the region of 35 movements during the peak periods. This level of traffic can be accommodated on the road network in the vicinity without having a detrimental impact on the network function for the purposes of either highway safety or capacity. Moreover in the context of the operation of the Freston Crossroads, the forecast level of additional traffic can be accommodated within the capacity of that junction without out having a significant impact upon its operation.

## 4 Site Sustainability

- 4.1 Holbrook is classified as a Core Village in the Babergh Settlement Hierarchy and as such is considered to be a suitable location for residential development and contains a range of essential facilities and amenities including the following:
  - Primary School
  - Secondary School
  - Convenience Stores
  - Doctors/Dispensary

- Sports Centre
  - Post Office
  - Butcher
  - Pubs
  - Village Hall
  - Bus Services
- 4.2 The facilities and amenities listed above are all within 800m of the site and as such are within reasonable walking distance.
- 4.3 The site can also take advantage of having direct connections to the existing public right of way network providing for leisure access.
- 4.4 The site is located adjacent to an existing bus service route and is within 400m of existing stops on Ipswich Road providing an hourly service between the site and Ipswich and Manningtree. These services also provide connections to the mainline rail stations at Ipswich and Manningtree and as such provide excellent commuter connectivity.
- 4.5 Timetables for the currently available bus services are held in **Appendix 4**.
- 4.6 Footways in the vicinity of the site provide good quality street lit connections with the nearby facilities and amenities ensuring excellent opportunities for access by means other than the private car in line with National Planning Policy.
- 4.1 There are two alternative potential sites put forward for residential allocation in Holbrook shown in the consultation local plan. The site land west of B1080 and north of Woodlands Road (SS 0201) is not as accessible as this site in the context of access to local facilities and amenities via means other than the private car.
- 4.2 The site, land at Hyams Lane, site SS 0215 would be likely to require access through the existing residential road network which is likely to already support the maximum number of units usually permitted by Suffolk County Council via a residential access road such as Mill Rise.

## 5 Summary

- 5.1 The proposal site has been assessed in the context of vehicular access and sustainable connections to the local area.
- 5.2 Access to the site can be provided in accordance with current design standards and would provide a suitable level of vehicular access to the site without compromising highway safety or capacity in the vicinity. Safe pedestrian access connecting into the existing footway network to the site can be achieved with the proposed access arrangements.



- 5.3 The site is in a very sustainable location within the village and is in an excellent location in terms of providing opportunities for access via means other than the private car.
- 5.4 In consideration of the foregoing, a residential allocation on the site for at least 60 units could be accommodated without having a detrimental impact in terms of either highway safety or capacity.

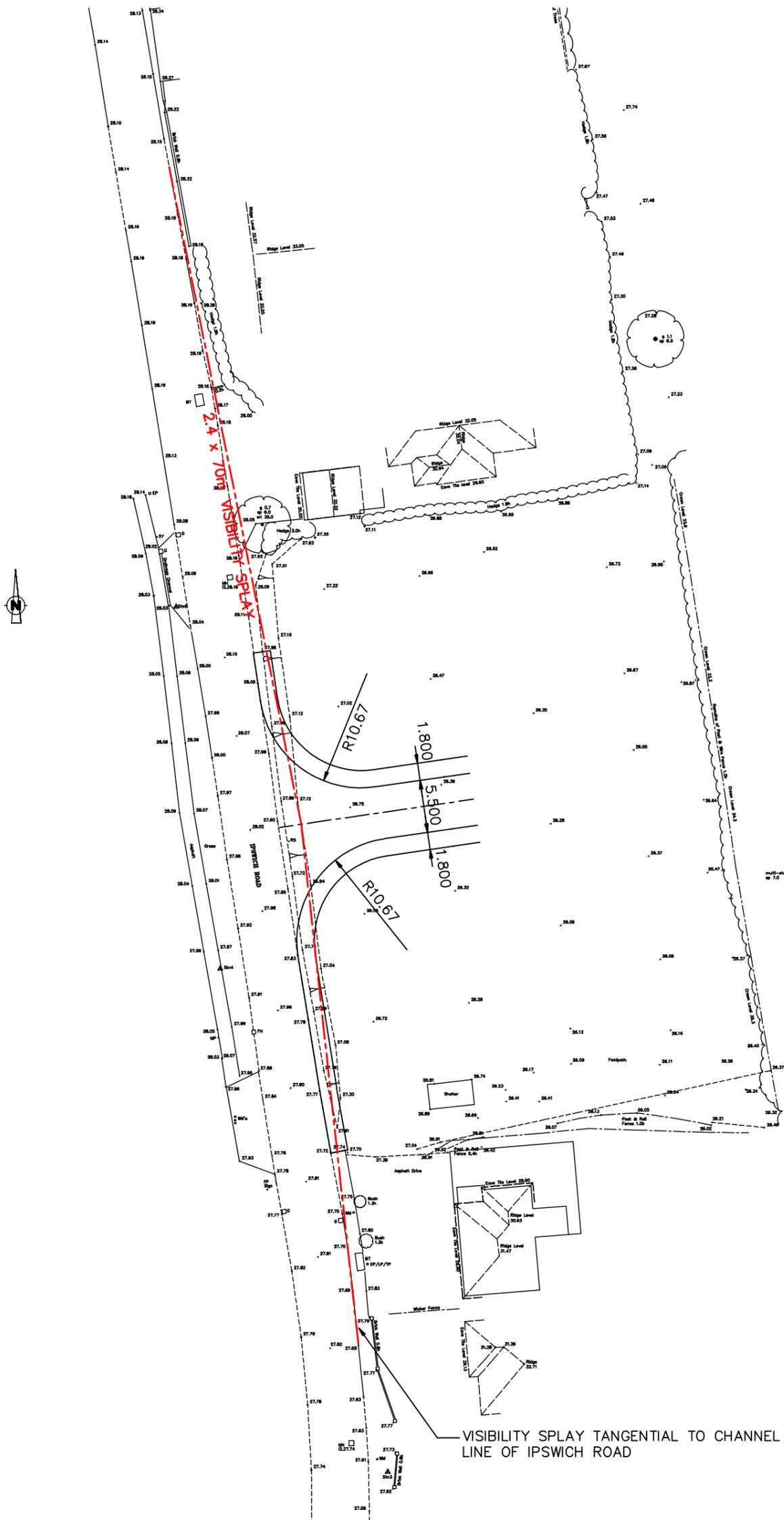


**Appendix 1**  
**Site Location**





**Appendix 2**  
**Proposed Site Access Arrangements**



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Job title  
**LAND NORTH OF ALPHA  
 IPSWICH ROAD  
 HOLBROOK, IP9 2QT**

**PLAN BUILD**  
 Services

Mulberry, Hadleigh Road  
 East Bergholt, Colchester  
 Essex, CO7 6QT  
 Tel: 01206 299493  
 Email: ag.homes@btconnect.com

Client  
**THORCROSS BUILDERS LTD**

Drawn  
**OCT. 2017**

Drawing number

Dwg title  
**PROPOSED ACCESS PLAN**

Scale  
**1 : 500 @ A3**

**TH49/H2**



**Appendix 3**  
**Concept Site Proposals**

**DEVELOPMENT AREA**  
1.7Ha gross development area  
34 houses @ 20/Ha, or  
51 houses @ 30/Ha

new planting proposed  
to contain eastern side of  
development

area retained  
as agricultural  
field

existing plantation  
woodland - to  
be retained and  
managed



**EXPLANATORY NOTES:**

This plan provides a development proposal option for this site. It is the first option in a series of two possible development options / approaches prepared by Nigel Cowlin Ltd.

The proposals and strategy taken have been led by consideration of landscape and visual sensitivities as well as other related matters, such as proximity to the Area of Outstanding Natural Beauty (AONB) and Holbrook Gardens parkland landscape to the east and the County Wildlife Site (CWS) to the south. This was informed by desk and field study exercises carried out by experienced landscape architects.

The proposed development area would occupy the most contained portion of the site, where it would lie closely related to the existing settlement pattern inbetween and adjacent to existing village housing and with main road access. This is a location where development could be readily accommodated and contained with some simple planting mitigation along the eastern boundary. A regular 20-30 dwellings per hectare development density is proposed in this area.

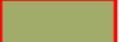
Within the site the existing triangular plantation would be retained and could be managed as a community woodland. Gradual thinning of the conifers in favour of the existing subordinate population of maturing native deciduous trees could provide a more attractive woodland of greater amenity and biodiversity value in the long term.

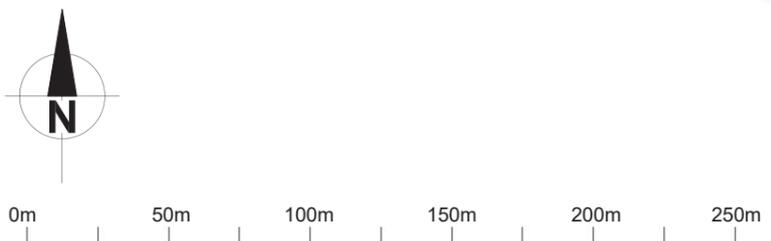
The footpath through the site could be realigned to take a more rational route through the site. This could take an attractive route alongside and allowing access to the existing plantation woodland. It would pass around the edge of the development rather than through it and would return to connect with the rest of the local footpath network in the north-east corner of the site.

The remaining eastern area of the site is retained as undeveloped in this option. This area would be retained in agricultural cultivation.

The north-eastern area of the site is the most visually exposed in views from the north and across the valley to the north-east. Many footpaths cross this area and the views back to the south-west are attractive and verdant. Keeping development back from the north-east part of the site, together with a planted enclosure to the east of the development area, would provide an attractive edge and would preserve the character of the area.

**KEY:**

-  the site (6.14 Ha, 15.18 Acres)
-  development area
-  access road
-  shared private drive
-  planting
-  existing footpath
-  length of diverted footpath
-  new footpath route
-  main direction of rural views back to site edge



Nigel Cowlin Ltd is a Landscape Institute Registered Practice with Chartered Landscape Architects specialising in landscape assessment and landscape design issues relating to planning and development. The company's landscape and visual impact assessment experience includes residential schemes ranging from single house developments to large urban extensions, commercial developments, as well as wind and solar energy projects in a variety of contexts. These landscape and visual impact assessment services have been provided in relation to standard planning application cases as well as technical chapters for Environmental Statements and as part of expert witness services for planning inquiries.

Date	Rev	Rev/Author/Checked by
07.11.17	a	Corrections/NC/CJ
03.11.17	-	Initial submission/NC/CJ

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Client: Thorcross Builders Ltd

Project: Land East of Ipswich Road, Holbrook

Drawing Title: Development Zoning & Landscape Strategy (OPTION 1)

Scale: 1:2500 @ A3 Drawn by: NC

Date: 03 Nov 2017 Chkd by: CJ

Drawing Number: NC17.404-P201 Revision: -

**DEVELOPMENT AREA 1**  
1.7Ha gross development area  
34 houses @ 20/Ha, or  
51 houses @ 30/Ha

new planting proposed  
to contain eastern side of  
development

open space /  
wildlife area

existing plantation  
woodland - to  
be retained and  
managed

wildlife buffer area alongside  
bordering CWS

**DEVELOPMENT AREA 2**  
approx 1.0Ha gross development area  
8 houses @ 8/Ha  
Low density development area in rural  
style landscape framed development  
pattern

**EXPLANATORY NOTES:**

This plan provides a development proposal option for this site. It is the second option in a series of two possible development options / approaches prepared by Nigel Cowlin Ltd.

The proposals and strategy taken have been led by consideration of landscape and visual sensitivities as well as other related matters, such as proximity to the Area of Outstanding Natural Beauty (AONB) and Holbrook Gardens parkland landscape to the east and the County Wildlife Site (CWS) to the south. This was informed by desk and field study exercises carried out by experienced landscape architects.

Development Area 1 would occupy the most contained portion of the site, where it would lie closely related to the existing settlement pattern inbetween and adjacent to existing village housing and with main road access. This is a location where development could be readily accommodated and contained with some simple planting mitigation along the eastern boundary. A regular 20-30 dwellings per hectare development density is proposed in this area.

Development Area 2 would occupy a second area set back to the south-east. This area is away from the most visually exposed portion of the site, which is to the north-east, and lies within a more recessive location to the south-east. Here a landscape dominated and low-density approach is proposed so that it would not harm the setting of the AONB and to allow the built form to blend into the landscape. This approach would be designed to provide an informal rural style of development consisting of widely spaced properties framed with lots of greening and additional tree cover.

Within the site the existing triangular plantation would be retained and could be managed as a community woodland. Gradual thinning of the conifers in favour of the existing subordinate population of maturing native deciduous trees could provide a more attractive woodland of greater amenity and biodiversity value in the long term.

The footpath through the site could be realigned to take a more rational route through the site. This could take an attractive route alongside and allowing access to the existing plantation woodland. It would pass around the edge of the development rather than through it and would return to connect with the rest of the local footpath network in the north-east corner of the site.

An open space, perhaps wildlife area for ecological mitigation, is indicated for the north-east portion of the site. This is the most visually exposed area in views from the north and across the valley to the north-east. Many footpaths cross this area and the views back to the south-west are attractive and verdant. Maintaining open space in the north-east part of the site, together with some parkland style tree planting enhancement and a planted enclosure to the east of the main development area, would provide an attractive edge and would preserve and enhance the character of the area.

Nigel Cowlin Ltd is a Landscape Institute Registered Practice with Chartered Landscape Architects specialising in landscape assessment and landscape design issues relating to planning and development. The company's landscape and visual impact assessment experience includes residential schemes ranging from single house developments to large urban extensions, commercial developments, as well as wind and solar energy projects in a variety of contexts. These landscape and visual impact assessment services have been provided in relation to standard planning application cases as well as technical chapters for Environmental Statements and as part of expert witness services for planning inquiries.

**KEY:**

-  the site (6.14 Ha, 15.18 Acres)
-  development area
-  access road
-  shared private drive
-  planting
-  domestic garden areas (Development Area 2)
-  existing footpath
-  length of diverted footpath
-  new footpath route
-  main direction of rural views back to site edge

Date	Rev	Rev/Author/Checked by
07.11.17	a	Corrections/NC/CJ
03.11.17	-	Initial submission/NC/CJ

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Client: Thorcross Builders Ltd

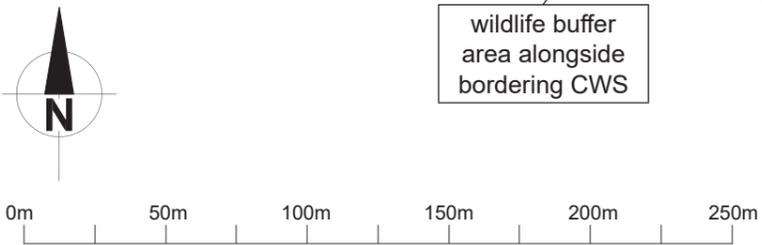
Project: Land East of Ipswich Road, Holbrook

Drawing Title: Development Zoning & Landscape Strategy (OPTION 2)

Scale: 1:2500 @ A3 Drawn by: NC

Date: 03 Nov 2017 Chkd by: CJ

Drawing Number: NC17.404-P202 Revision: a





**Appendix 4**  
**Public Transport Information**

	Monday to Friday (Except Bank Holidays)	Saturday	Sunday
Operator	SN	no service	no service
Service Restrictions	Sch		
Whitehouse, Asda (adj)	0715		
Chantry, Kingfisher Avenue (adj)	0725		
Chantry, Sprites Lane (opp)	0727		
Brookwood, Swinton Close (opp)	0732		
Pinewood, Nursery (opp)	0735		
Stoke Park, ASDA (opp)	0738		
Halifax, Halifax Primary School (o/s)	0743		
Stoke, Rectory Road (adj)	0745		
Stoke, Subway (opp)	0748		
Bourne Bridge, Petrol Station (adj)	0750		
Wherstead, The Street (adj)	0752		
Tattingstone, White Horse (opp)	0756		
Tattingstone, Church (adj)	0759		
Tattingstone, Wheatsheaf (o/s)	0800		
Brantham, Court Farm (opp)	0804		
Stutton, Community Hall (adj)	0805		
Stutton, Kings Head (adj)	0808		
Stutton, Larksfield Road (adj)	0808		
Holbrook, Academy (E-bound)	0820		

**NOTES**

Sch School Days Only

**OPERATORS**

SN Suffolk Norse 01473 341 500

Suffolk 03/09/2015

	Monday to Friday (Except Bank Holidays)	Saturday	Sunday
Operator SN		no service	no service
Service Restrictions Sch			
Holbrook, Academy (E-bound)	1545		
Stutton, Larksfield Road (opp)	1555		
Stutton, Kings Head (opp)	1557		
Stutton, Community Hall (opp)	1600		
Brantham, Court Farm (adj)	1601		
Tattingstone, Wheatsheaf (opp)	1605		
Tattingstone, Church (opp)	1606		
Tattingstone, White Horse (o/s)	1609		
Wherstead, The Street (opp)	1613		
Bourne Bridge, Petrol Station (adj)	1615		
Stoke, Subway (adj)	1617		
Stoke, Rectory Road (opp)	1620		
Halifax, Halifax Primary School (opp)	1622		
Stoke Park, ASDA (o/s)	1627		
Pinewood, Nursery (adj)	1630		
Brookwood, Swinton Close (adj)	1633		
Chantry, Sprites Lane (adj)	1638		
Chantry, Kingfisher Avenue (opp)	1640		
Whitehouse, Asda (adj)	1650		

**NOTES**

Sch School Days Only

**OPERATORS**

SN Suffolk Norse 01473 341 500

Suffolk 03/09/2015

# Route 92 Ipswich - Holbrook - Stutton - Brantham - Manningtree or East Bergholt High School

Showing 98 to show all buses between Ipswich and Holbrook

## Mondays to Fridays except Bank Holidays

Route No	92	92	92	92	92	92	92	92	92	92	92	98	92	92
		Sch	Sch	NSch	Sch	NSch								
Suffolk One (only when college is open)														1610
Old Cattle Market Bus Station Stand G	0710	0803		0825		0925	1025	1125	1225	1325	1425	1515	1630	1740
Ipswich, Rail Station, Burrell Road	0714	FW		0829		0929	1029	1129	1229	1329	1429	1519	1634	1744
Bourne Bridge	0720	0815		0835		0935	1035	1135	1235	1335	1435	1524	1640	1754
Freston, opp The Boot	0722	0817		0840		0940	1040	1140	1240	1340	1440	1528	1645	1755
Holbrook, opp Compasses	0728	0823		0846		0946	1046	1146	1246	1346	1447	1541	1651	1802
Holbrook, Royal Hospital School	0730	0826		0849		0949	1049	1149	1249	1349	1449		1654	1804
Stutton, Kings Head	0733	0830		0853		0953	1053	1153	1253	1353	1453		1658	1808
Brantham, Bull	0738	0836	E	0859	E	0959	1059	1159	1259	1359	1459		1704	1814
Brantham, Brooklands School	0742	0841	0904	0904	1004	1004	1104	1204	1304	1404	1504		1709	1819
Cattawade, Slip road	0745	0846	0907	0907	1007	1007	1107	1207	1307	1407	1507		1712	1822
East Bergholt, High School	↓	0853	0858	↓	0958	↓	↓	↓	↓	↓	↓		↓	
Manningtree, Rail Station	0747		0909	0909	1009	1009	1109	1209	1309	1409	1509		1714	
Lawford, Long Road			0911	0911	1011	1011	1111	1211	1311	1411	1511		1716	
Manningtree, Bendalls Court			0915	0915	1015	1015	1115	1215	1315	1415	1515		1720	

## Saturdays

Route No	92	92	92	92	92	92	92	98	92	92
Old Cattle Market Bus Station Stand G	0825	0925	1025	1125	1225	1325	1425	1515	1630	1740
Ipswich, Rail Station, Burrell Road	0829	0929	1029	1129	1229	1329	1429	1519	1634	1744
Bourne Bridge	0835	0935	1035	1135	1235	1335	1435	1524	1640	1754
Freston, opp The Boot	0840	0940	1040	1140	1240	1340	1440	1529	1645	1755
Holbrook, opp Compasses	0846	0946	1046	1146	1246	1346	1446	1533	1651	1802
Holbrook, Royal Hospital School	0849	0949	1049	1149	1249	1349	1449		1654	1804
Stutton, Kings Head	0853	0953	1053	1153	1253	1353	1453		1658	1808
Brantham, Bull	0859	0959	1059	1159	1259	1359	1459		1704	1814
Brantham, Brooklands School	0904	1004	1104	1204	1304	1404	1504		1709	1819
Cattawade, Slip road	0907	1007	1107	1207	1307	1407	1507		1712	1822
Manningtree, Rail Station	0909	1009	1109	1209	1309	1409	1509		1714	
Lawford, Long Road	0911	1011	1111	1211	1311	1411	1511		1716	
Manningtree, Bendalls Court	0915	1015	1115	1215	1315	1415	1515		1720	

  This bus runs on schooldays only

  This bus does not run on Schooldays.

**E** Starts from East Bergholt High School 6 minutes earlier and calls at Brantham Mill.

**FW** Operates via Franciscan Way direct to Stoke Bridge, not via Princes Street and Burrell Road.

## Route 92 Manningtree - Brantham - Stutton - Holbrook - Ipswich

Showing 98 to show all buses between Holbrook and Ipswich including part of route 93C to show all buses between Manningtree and Ipswich

### Mondays to Fridays except Bank Holidays

Route No	92	93C	98	92	92	92	92	92	92	92	92	92	92	92	92	
Manningtree, Bendalls Court				0920	1020	1120	1220	1320	1420	1520	1520	1720				
Manningtree, Rail Stn A137Roundabout		0750		0922	1022	1122	1222	1322	1422	1522	1522	1722				
East Bergholt, High School		0807		↓	↓	↓	↓	↓	↓	↓	1545	↓				
Cattawade, Slip road	0715	0757		0931	1031	1131	1231	1331	1431	1531	1549	1731				
Brantham, Brooklands School	0718	0759		0934	1034	1134	1234	1334	1434	1534	1552	1734				
Brantham, Bull	0723	↓		0939	1039	1139	1239	1339	1439	1539	1557	1739				
Stutton, Kings Head	0728	↓		0944	1044	1144	1244	1344	1444	1544	1602	1744				
Holbrook, Royal Hospital School	0731	↓		0947	1047	1147	1247	1347	1447	1547	1605	1747				
Holbrook, opp Compasses	0734	↓	0813	0950	1050	1150	1250	1350	1450	1550	1608	1750				
Freston, opp The Boot	0740	↓	0822	0956	1056	1156	1256	1356	1456	1556	1614	1756				
Bourne Bridge	0744	↓	0827	1000	1100	1200	1300	1400	1500	1600	1618	1800				
Suffolk One		0837														
Ipswich Station Forecourt	0754	↓	0837	1006	1106	1206	1306	1406	1506	1606	1624	1806				
Old Cattle Market Bus Station	0800	0848	0846	1012	1112	1212	1312	1412	1512	1612	1630	1812				

  This bus runs on Schooldays only

  This bus does not run on Schooldays

### Saturdays

Route No	92	98	92	92	92	92	92	92	92	92
Manningtree, Bendalls Court			0920	1020	1120	1220	1320	1420	1520	1720
Manningtree, Rail Stn A13 Roundabout			0922	1022	1122	1222	1322	1422	1522	1722
Cattawade, Slip road	0741		0931	1031	1131	1231	1331	1431	1531	1731
Brantham, Brooklands School	0744		0934	1034	1134	1234	1334	1434	1534	1734
Brantham, Bull	0749		0939	1039	1139	1239	1339	1439	1539	1739
Stutton, Kings Head	0754		0944	1044	1144	1244	1344	1444	1544	1744
Holbrook, Royal Hospital School	0757		0947	1047	1147	1247	1347	1447	1547	1747
Holbrook, Compasses	0800	0813	0950	1050	1150	1250	1350	1450	1550	1750
Freston, The Boot	0806	0822	0956	1056	1156	1256	1356	1456	1556	1756
Bourne Bridge	0810	0827	1000	1100	1200	1300	1400	1500	1600	1800
Ipswich Station Forecourt	0816	0837	1006	1106	1206	1306	1406	1506	1606	1806
Old Cattle Market Bus Station	0822	0846	1012	1112	1212	1312	1412	1512	1612	1812

**Route 97 Ipswich • Woolverstone • Chelmondiston • Shotley**  
**Route 98 Ipswich • Holbrook • Harkstead • Shotley**

**Mondays to Saturdays except Bank Holidays**

Route No	97	97	97	97	97	97	98	98	97	97	97	97
							NSch	Sch	Sch	NSch		
Suffolk One (only when college is open)									1550			
Old Cattle Market Bus Station Stand J	0645		0915	1045	1215	1345	1515	1515	1610	1610	1710	1830
Ipswich, Rail Station, Burrell Road	0649	0716	0919	1049	1219	1349	1519	1519	1614	1614	1714	1834
Bourne Bridge	0654	0721	0924	1054	1224	1354	1524	1524	1619	1619	1719	1839
Freston, opp The Boot	0659	0726	0929	1059	1229	1359	1529	1529	1624	1624	1724	1844
Holbrook Academy	↓	↓	↓	↓	↓	↓	↓	1538	↓	↓	↓	↓
Holbrook, opp Compasses	↓	↓	↓	↓	↓	↓	1533	1541	↓	↓	↓	↓
Woolverstone, Hall Gates	0702	0729	0932	1102	1232	1402	↓	↓	1627	1627	1727	1847
Alton Green	↓	↓	↓	↓	↓	↓	1534	1542	↓	↓	↓	↓
Harkstead, Bakers Arms	↓	↓	↓	↓	↓	↓	1536	1545	↓	↓	↓	↓
Erwarton, Church	↓	↓	↓	↓	↓	↓	1544	1553	↓	↓	↓	↓
Chelmondiston, opp Red Lion	0707	0734	0937	1107	1237	1407	↓	↓	1632	1632	1732	1852
Shotley, opp The Rose	0715	0742	0945	1115	1245	1415	1550	1559	1640	1640	1740	1900
Shotley Gate, opp Bristol Arms	0721	0748	0951	1121	1251	1421	1556	1605	1646	1646	1746	1906

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Shotley Gate, opp Bristol Arms	0725	0750	0830	0830	0955	1125	1255	1425	1610	1650	1750	1910
Shotley, The Rose	0731	0756	0834	0834	0959	1129	1259	1429	1616	1656	1754	1914
Chelmondiston, Red Lion	0738	↓	0840	0840	1005	1135	1305	1435	1623	1703	1800	1920
Erwarton, Queens Head	↓	0800	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓
Harkstead, Bakers Arms	↓	0808	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓
Woolverstone Hall Gates	0741	↓	0843	0843	1008	1138	1308	1438	1626	1706	1803	1923
Lower Holbrook, Alton Green	↓	0810	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓
Holbrook, Compasses	↓	0813	↓	↓	↓	↓	↓	↓	↓	↓	↓	↓
Freston, The Boot	0744	0822	0846	0846	1011	1141	1311	1441	1629	1709	1806	1926
Bourne Bridge	0750	0827	0851	0851	1016	1146	1316	1446	1635	1715	1811	1931
Ipswich, Rail Station, Forecourt	0800	0837	0857	0857	1022	1152	1322	1452	1645	1725	1817	1937
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# (12) STRUTT & PARKER, obo Greenwich Hospital Trust

## Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Part's A & B

Part A: Respondent	
Title / Name:	
Job Title (if applicable):	
Organisation / Company (if applicable):	Greenwich Hospital Trust
Address:	C/O Agent
Postcode:	
Tel No:	
E-mail:	

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Strutt & Parker
Address:	Coval Hall Rainsford Road Chelmsford Essex
Postcode:	CM1 2QF
Tel No:	01245 254646
E-mail:	Richard.Clews@struttandparker.com

## Section Two: Your comment(s)

To which part of the Plan does your comment relate? Use separate forms if necessary.

<b>Paragraph No.</b>	Please see attached report	<b>Policy No.</b>	Please see attached report
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**Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)**

<b>Support</b>		<b>Oppose</b>	<b>X</b>
<b>Support with modifications</b>		<b>Have Comments</b>	

**Please give details of your reasons for support / opposition, or make other comments here:**

*Please be as brief and concise as possible ..*

**Please see attached report.**

*(Continue on separate sheet if necessary)*

**What improvements or modifications would you suggest?**

*Please be as brief and concise as possible ..*

**Please see attached report.**

*(Continue on separate sheet if necessary)*

If you are including additional pages these should be clearly labelled and referenced.

**Normally the Examiner will aim to consider the matter through the written representations.**

Occasionally an Examiner may consider it necessary to hold a hearing to discuss a particular issue. If you consider a hearing should be held please explain why this is necessary.

Note: The decision on whether to hold a hearing is entirely at the discretion of the Examiner

**I consider that a hearing should be held because ...**

*Please be as brief and concise as possible ..*

**Please see attached report.**

*(Continue on separate sheet if necessary)*

**Please indicate (tick) whether you wish to be notified of:**

The publication of the recommendations of the Examiner	<b>X</b>
The final 'making' (adoption) of the Holbrook NP by Babergh District Council	<b>X</b>

<b>Signed: Strutt &amp; Parker</b>	<b>Dated: 25.01.23</b>
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# Neighbourhood Plan Consultation Response

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## Holbrook Neighbourhood Plan (Regulation 16) (2022)

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Greenwich Hospital Trust

January 2023

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# CONTENTS

- 1. Introduction and Overview ..... 4
- 2. Basic Conditions ..... 6
- 3. Conclusions..... 13
- 4. Nature of examination ..... 15

- Appendix A Response to the Site Options Assessment Report
- Appendix B Letter from JLP Planning Inspectors to Babergh & Mid Suffolk Councils 9.12.21
- Appendix C Letter from Babergh & Mid Suffolk Councils to the JLP Planning Inspectors  
18.11.21

## 1. Introduction and Overview

- 1.1 These representations are made in respect of consultation on the proposed Holbrook Neighbourhood Plan (Regulation 16 (2022) ('the HNP'), and are submitted on behalf of Greenwich Hospital Trust (GHT).
- 1.2 GHT own the land on Hyams Lane identified as Site 4 in the HNP and the accompanying Housing Needs Assessment (HNA) (January 2020) produced by AECOM. The site is identified as SS0215 in the Strategic Housing and Economic Land Availability Assessment (SHELAA) (October 2020) produced jointly by Babergh and Mid Suffolk Councils.
- 1.3 Strutt & Parker has previously submitted a response to the HNP Site Options Assessment (AECOM, December 2019) on behalf of GHT. The concerns raised in that response remain and it is included as for reference as part of this consultation response (Appendix A).
- 1.4 The current Babergh Local Plan comprises the saved policies of the Babergh Local Plan Alteration No.2 (adopted June 2006) and the Core Strategy (February 2014). The former has a plan period to 2106 and its strategic provisions are time expired.
- 1.5 A new Local Plan is being prepared jointly with Mid Suffolk District Council. Examination of the Joint Local Plan (JLP) commenced in June 2021 but has stalled in response to concerns raised by the Inspectors. The Councils are in the process of making significant changes to the submitted Plan as set out in the correspondence between the Councils and the Planning Inspectorate dated 9<sup>th</sup> December 2021 (Appendix B) and 18<sup>th</sup> November 2021 (Appendix C).
- 1.6 The JLP will be split into two parts. Part 1 will set the strategic vision and objectives to guide development to 2037, with adoption currently anticipated later this year. Part 2, which is not programmed for adoption until 2025, will focus on:
- an up-to-date settlement hierarchy;
  - a spatial distribution of any housing allocations;
  - **housing requirement figures for Neighbourhood Plan areas;**
  - site allocations;

- up-to-date settlement boundaries reflecting commitments and allocations;
- open space designations with a relevant development management policy;
- an up-to-date assessment of need for accommodation for Gypsies, Travellers, Travelling Showpeople and Boat Dwellers, together with relevant development management policies and, if necessary, allocations to provide for this need.  
(our emphasis added)

|

1.7 The HNP has flaws that, in our view, render it incapable of proceeding to referendum. In overview, the key concerns are:

- The HNP is contrary to numerous aspects of national policy and guidance.
- The HNP does not conform to strategic policies in the Development Plan;
- There is a lack of justification for the approach taken, including for the selection of housing sites.

1.8 In order for a Neighbourhood Plan to proceed to referendum, it is required to meet the 'basic conditions' as set out in Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990. However, it is evidently the case that the HNP fails to meet these. Our concerns in this respect are set out in Section 2 of this representation.

1.9 We recognise that the examination of most Neighbourhood Plans can be conducted through written representations. However, in this instance, it is considered that a public hearing will be necessary given the complexity of the issues in respect of the HNP, and in the interests of fairness to all parties.

## 2. Basic Conditions

### Background and requirements of a Neighbourhood Plan

- 2.1 The role of the Independent Examiner appointed to consider the HNP will include the determination of whether it meets the ‘basic conditions’ as per Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990. These are as follows:
- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;
  - 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;
  - c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
  - d) the making of the order contributes to the achievement of sustainable development;
  - e) the making of the order 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);
  - f) the making of the order does not breach, and is otherwise compatible with, EU obligations; and
  - g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.
- 2.2 It is acknowledged that b) and c) only apply to the consideration of Neighbourhood Development Orders, as opposed to Neighbourhood Plans.
- 2.3 The HNP is considered to fail basic conditions a), d) and e), for the reasons set out below.

## **National Policy and Guidance**

2.4 The HNP must have regard to national policies and advice contained in guidance issued by the Secretary of State. Paragraph 16 of the National Planning Policy Framework (NPPF) requires that plans:

*“a) be prepared with the objective of contributing to the achievement of sustainable development;*

*b) be prepared positively, in a way that is aspirational but deliverable;*

*c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*

*d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*

*e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*

*f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”*

2.5 NPPF para. 29 goes on to explain the role of neighbourhood plans:

*“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”*

2.6 With reference to the relationship between strategic policies and neighbourhood plans, the footnote to para. 29 states:

*“Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.”*

2.7 NPPF para. 20 sets out the strategic matters that are to be addressed through local plan policies and includes making sufficient provision for housing and affordable housing. In the adopted Core Strategy (CS), Holbrook is identified as a Core Village (Policy CS2). The Core Villages “have 5 or more settlements looking to them for many everyday convenience needs. All of those listed host some of the key everyday services including

- a primary school, Doctors Surgery, Convenience shop / Post Office and have access to public transport. (CS para. 2.1.3.2)
- 2.8 Policy CS2 indicates that Core Villages will act as the focus for development in their functional cluster and allocations for housing and employment will be made in a Site Allocations Document. Policy CS3 identifies a need for a minimum of 1,050 new dwellings in the Core and Hinterland Villages. A Site Allocations Document setting out how this figure would be delivered was never adopted.
- 2.9 In the absence of a Site Allocations Document, Policy CS11 provides criteria to guide the assessment of applications for development in the Core Villages.
- 2.10 Para 65 of the NPPF requires local planning authorities (LPAs) establish housing requirements for their whole area, including those for designated neighbourhood areas. In the absence of this strategic provision, LPAs should provide an indicative figure for neighbourhood areas, if requested to do so, taking into account evidence of latest housing need. (para 66).
- 2.11 The HNP's strategy for new housing delivery is predicated on the emerging JLP, which suggests a minimum of 65 new dwellings be provided in the HNP in the period to 2037 (Table 04 – Minimum Housing Requirement for NP Areas). Paragraphs 3.8 and 3.13 of the HNP refer to this minimum requirement and indicate that it has already been met by existing planning permissions. On this basis, the HNP makes no further allocations for additional dwellings.
- 2.12 The figure provided in Table 04 is from an emerging Local Plan that is still the subject of examination. Further, the entire premise of the JLP's housing strategy is being revisited. The 9<sup>th</sup> December 2021 letter from the Inspectorate to the Councils requires that a fundamental review of the JLP's settlement hierarchy, spatial distribution of housing and the housing site selection process, is undertaken. Further, it suggests the deletion of a raft of related policies, including SP04, from which Table 04 is derived. As part of the suggested remedy, the JLP Councils propose to revisit all potential sites that were initially rejected as part of the SHELAA process.
- 2.13 Planning Policy Guidance provides guidance on the relationship between neighbourhood plans and local plan policy where the latter is out-of-date and/or emerging:

*“Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its local plan (or, where applicable, a spatial development strategy is being prepared by an elected Mayor or combined authority)”*

*“Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.”*

*“Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:*

- the emerging neighbourhood plan*
- the emerging local plan (or spatial development strategy)*
- the adopted development plan*

*with appropriate regard to national policy and guidance.2*

*The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.”*

PPG ref. Paragraph 009 Reference ID: 41-009-20190509

2.14 The PPG further advises that:

*“Where an indicative housing requirement figure is requested by a neighbourhood planning body, the local planning authority can follow a similar process to that for providing a housing requirement figure. They can use the authority’s local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area.”*

PPG ref. Paragraph 102 Reference ID: 41-102-20190509

- 2.15 The housing requirement relied upon by the HNP is no longer relevant and it can be afforded no weight as the entire premise of the JLP's housing strategy is currently being revisited and is yet to be published, consulted upon, or the subject of examination.
- 2.16 The HNP's reliance on the now abandoned JLP housing figures distribution means that it would, from the outset, fail to meet the identified need for affordable housing identified in its own evidence base. The Holbrook Parish Housing Needs Assessment (HNA) (AECOM, January 2020), identifies a need for 96 affordable homes in the Parish during the HNP period. It acknowledges that the reliance upon the 68 dwelling JLP 'allocation' means that this demand will not be met (para. 146).
- 2.17 Section 6 of the HNP summarises the conclusions of the HNA, identifying issues of affordability (para. 6.35), a need to diversify tenure (para. 6.36), and a need to deliver smaller homes (para. 6.40). The HNP's reliance upon completed or consented housing sites means that none of these issues can be remedied in a meaningful way. Para. 6.39 identifies the recently completed Admiral's Quarter development, which delivered 27 affordable homes. This still leaves a significant shortfall against the need for 96 affordable dwellings identified in the HNA.
- 2.18 The HNP's strategy to only provide new residential development of up to two dwellings on infill plots, would not trigger the affordable housing threshold set out in para. 64 of the NPPF.
- 2.19 This approach would be contrary to the key issue set out at para. 7.0 of the HNP:

*“The principal objective of the Plan is to provide for the sustainable development of the village through the achievement of a better-balanced community. Historically the trend towards an increasing ageing population has accelerated and continues to do so. It is considered desirable to increase the proportion of young people living within the village by ensuring that any future developments put the emphasis on affordable, smaller homes, capable of meeting well established local needs. This should also enable older residents, who wish to downsize, to stay in the village.”*

- 2.20 It is clear that the housing requirement figure on which the HNP is predicated, is not up-to-date and would not be close to addressing the actual need for housing identified by the HNA which forms part of its evidence base.

### **Sustainable Development**

- 2.21 One of the basic conditions the NP has to satisfy, is whether the plan will deliver sustainable development. The three strands are set out in paragraph 8 of the NPPF. The HNP's response in terms of the social objective, is to rely upon the planning permissions already granted and not make provisions for any further residential provision for the entirety of the plan period other than limited infilling. It does not ensure "*that a sufficient number and range of homes can be provided to meet the needs of present and future generations*" (NPPF, para. 8), neither does it "*support the Government's objective of significantly boosting the supply of homes*" (NPPF, para.59).
- 2.22 As currently drafted, it would fail to deliver sufficient housing to meet current identifiable need of its own evidence base, let alone make provision for future generations. The plan would fail to deliver sustainable development as required by the NPPF.

### **HNP Site Assessment**

- 2.23 The HNP summarises the site selection analysis undertaken by AECOM. We have previously commented on this exercise and raised concerns. One of the principal issues we raised was the rejection of otherwise acceptable sites, as there was no housing requirement in the area. This appears, again, to relate to the now deleted JLP 'allocation' of 68 dwellings, albeit a minimum, which has been met by planning permissions issued since the JLP base date of 1<sup>st</sup> April 2018.
- 2.24 Site 4 had been rejected on this basis and because it is within a cordon sanitaire. The 2019 Site Options Assessment produced by AECOM, which forms part of the HNP's evidence base, references this, but indicates that it simply requires consultation with Anglian Water and is not an absolute constraint. The HNP summary, presents it as an absolute constraint.
- 2.25 The cordon sanitaire relates to a waste water treatment works on Hyams Lane, broadly opposite Site 4. Any proposals for development needs to be designed such that it would not be exposed to noise or odour associates with the works. Anglian Water would need

to be consulted on the layout and design. This process has recently been undertaken in respect of an application for planning permission to construct eight dwellings on land to the east of, and adjoining, Site 4 (planning application ref DC/21/01802). Anglian Water were content that residential development could be accommodated and raised no objection. The cordon sanitaire does not preclude residential development adjacent to the treatment works, but may influence its layout and design.

- 2.26 Similarly, the references to ‘high heritage sensitivity’ relates to listed buildings nearby, but not within or immediately adjacent to the site. Once again, the presence of listed buildings nearby, would not preclude development, but may affect its layout and design.
- 2.27 Further, as a previously rejected SHELAA site, site 4 will be revisited as part of the JLP’s review of the proposed housing strategy and allocations.

### 3 Conclusions

- 3.1 As currently drafted, the HNP fails to meet the basic conditions as set out at Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990. Specifically, it fails with regard to sub-paragraphs a), d) and e).
- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;
  - d) the making of the order contributes to the achievement of sustainable development;
  - e) the making of the order 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);
- 3.3 The HNP housing requirement relies upon emerging JLP policy SP04 and its accompanying Table 04. Little to no weight can be afforded these provisions as the JLP has effectively stalled and the JLP Councils are currently reviewing the Plan's housing strategy.
- 3.4 The HNP site analysis was, in part, undertaken with the JLP putative 'allocation' as an assessment criteria, with otherwise acceptable sites discounted on the basis of that need having already been met with reference to the then JLP minimum requirement. The HNA identifies a need for 96 affordable dwellings over the plan period, but this need has effectively been ignored, again with reference to the JLP requirements having already been met.
- 3.5 The HNP failure to meet an identifiable housing need is contrary to the requirements of the NPPF with regard to achieving sustainable development. The social objective of sustainability requires "*...that a sufficient number and range of homes can be provided to meet the needs of present and future generations*". (NPPF para. 8)
- 3.6 In its current form, the Plan does not contribute to the achievement of sustainable development, which is one of the HNP's stated objectives. (para. 3.6)
- 3.7 The HNP is not predicated on a robust evidence base, as a consequence of which there are internal conflicts between the proposed policies.

3.8 Given its failings, it is our view that the plan cannot proceed to referendum as currently drafted.

## **4 Nature of Examination**

- 4.1 The PPG<sup>1</sup> confirms that examinations of Neighbourhood Plan will usually take the form of written representations.
- 4.2 However, it also notes there will be cases where the Independent Examiner concludes it is necessary to hold a public hearing, in order to give interested parties fair chance to put forward their case.
- 4.3 We consider that the only way to ensure that all parties are given a fair opportunity to respond to matters / put forward a case would be through a public hearing, and that failure to do so may well prejudice the interests of one or more parties.
- 4.4 Accordingly, it is respectfully request that a public hearing be used as the vehicle through which the HNP is examined.

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<sup>1</sup> Paragraph: 056 Reference ID: 41-056-20180222



## **Response to Neighbourhood Plan supporting study**

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Holbrook Neighbourhood Plan Site Options Assessment and  
land at Hyams Lane, Holbrook

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Prepared on behalf Greenwich Hospital

July 2020

Client Name:	Greenwich Hospital
Type of Report:	Response to Neighbourhood Plan study
Prepared by:	Sam Hollingworth MRTPI
Approved by:	Richard Clews (Senior Associate Director)
Date:	July 2020

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**CONTENTS**

1.0 Introduction..... 4  
2.0 Housing Requirement and its relevance in considering site suitability ..... 5  
3.0 Assessment of Site Reference 4..... 9  
4.0 Overview and Conclusions ..... 17

## 1.0 Introduction

- 1.1 Strutt & Parker has been instructed by Greenwich Hospital to review the Holbrook Neighbourhood Plan Site Options Assessment (SOA), which has been prepared in support of the Holbrook Neighbourhood Plan (HNP). Specifically, Strutt & Parker has been instructed to consider the SOA's appraisal of land at Hyams Lane, Holbrook ('the Site').
- 1.2 The Site is being promoted by Greenwich Hospital for residential allocation through the HNP.
- 1.3 The HNP is still in its early stages of preparation. On 27 March 2018, Holbrook Parish Council submitted an application to define the boundary of their Neighbourhood Plan. Under the Neighbourhood Planning (General) Regulations 2012 (as amended). Babergh District Council confirmed the designated area on 6 April 2018.
- 1.4 AECOM was commissioned to undertake an assessment of potential sites for allocation through the HNP, resulting in the publication of the SOA in December 2019.
- 1.5 The SOA reports that eight sites were identified for assessment, seven of assessed in respect of their suitability for residential allocation.
- 1.6 The SOA included consideration of the Site (reference Site 4).
- 1.7 Having reviewed the assessment of the Site through the SOA, we wish to raise a number of concerns with the approach taken and the conclusions drawn. We detail these concerns – and how they can be addressed – within this report.
- 1.8 We wish to stress that we wish to work positively and constructively with the Parish Council and its consultants in the preparation of the HNP. The comments contained herein are intended to assist in the preparation of the HNP, and we have sought to raise concerns at this early stage to enable the Parish Council to address them.

## 2.0 Housing Requirement and its relevance in considering site suitability

- 2.1 At paragraph 1.10, the SOA makes reference to a Neighbourhood Plan Housing Needs Assessment (HNA) having been produced. However, we have been unable to locate this document.
- 2.2 The SOA refers to the HNA having identified an ageing population in Holbrook, and notes that this likely to engender a need for different types of housing with particularly locational requirements.
- 2.3 At paragraph 1.10, the SOA also references the Parish Council's view that there is a local affordable housing need. The SOA suggests the HNA supports this view, as it identifies no tenure of housing as being affordable to those on a Lower Quartile Income.
- 2.4 The above suggest there very much is a housing need in Holbrook, including for housing that meets the accommodation needs of older people.
- 2.5 At paragraph 1.19 of the SOA concerns the Joint Local Plan (JLP) being prepared by Babergh and Mid Suffolk District Councils (BMSDC), which, once adopted, will form part of the relevant Development Plan for Holbrook Parish. The SOA references the most recent iteration of the JLP (the Regulation 18, Preferred Options, draft published in July 2019), and reports that this contains a requirement for 68 dwellings for the Neighbourhood Plan area.
- 2.6 However, crucially, the SOA fails to acknowledge that, as per Table 04 of the JLP Preferred Options 2019, the requirement of 68 dwellings for Holbrook is a *minimum*.
- 2.7 The SOA goes on to state that at paragraph 1:19:
- “The Councils [Babergh and Mid Suffolk] consider the [housing] requirement to have been met through the development of the ‘Admirals Quarter’...There is therefore currently no outstanding obligation for land to be allocated to address the housing requirement in Holbrook.”*
- 2.8 However, we have not been able to identify where the Councils have confirmed the above view.

- 2.9 In any case, it must be recognised that not only is the figure set out in the JL Preferred Options 2019 a minimum, but that given the stage the JLP is at, proposed policies within it cannot be afforded anything more than limited weight. At paragraph 5.8, the SOA refers to the JLP being at an advanced stage, but Preferred Options does not constitute an advanced stage in the plan-making process, as has been confirmed through S78 appeal decisions.
- 2.10 It would be wholly inappropriate for assessment work currently being undertaken in respect of the HNP to assume that the emerging JLP is finalised and to rely unquestioningly on policies within it.
- 2.11 Notwithstanding the SOA's explanation of Holbrook's housing position at paragraph 1.19, at paragraph 1.20 it recommends the Parish Council should seek confirmation from BMSDC that it is not expected to meet an additional housing need. We agree that it has yet to be confirmed what Holbrook's housing need is. Given the lack of certainty in respect of the current housing requirement for Holbrook, we consider it particularly important for the SOA to not assume that housing requirements have already been met.
- 2.12 Furthermore, the SOA suggests that the results of the report can be used to guide decision-making on future developments in the village, in the event that existing commitments are not delivered. This further demonstrates that the SOA's conclusions are prematurely based on the assumption that no residential allocations are required.
- 2.13 Separately, the SOA itself brings in to question the view that no additional housing allocations are required, noting the acute housing affordability issue within the Parish; as well as suggesting a need for accommodation to meet the needs of older residents.
- 2.14 At paragraph 1.23 of the SOA, it is confirmed that four sites (including the Site) have been identified as being potential candidates for residential allocation in the event there is a need to allocate land for housing.
- 2.15 The SOA goes on to explain that Task 5 of the Site assessment process concludes with a traffic light assessment of sites' suitability, availability and achievability.
- 2.16 It is explained at paragraph 3.18 that 'green' indicates that a site is free from constraints, or the constraints to which it is subject can be resolved, and is therefore

suitable. 'Amber' sites are subject to constraints that would need to be resolved or mitigated, so that the site is potentially appropriate for allocation. 'Red' sites are unsuitable for development and therefore not appropriate for allocation.

2.17 The SOA gives no indication that the perceived need for a development will be a factor in considering the suitability of a site for development, and whether a site is rated 'red', 'amber' or 'green'. We consider it would be entirely correct for the SOA to disregard need at this stage. This is not to say that housing need will not be a key factor in decisions as to whether to allocate sites or not. But as the SOA itself acknowledges, the SOA can be a useful tool for the HNP in the event that a housing requirement is identified for Holbrook through the plan-making process.

2.18 Notwithstanding the SOA making (quite rightly) no reference to housing requirement being a factor as to whether a site is rated as 'red', 'amber, or 'green'; or the lack of clarity as to Holbrook's housing need, the SOA goes on to rate all seven of the sites assessed as potential residential allocation as 'red'. In a number of instances, the reason given for the site being rated as 'red' and thus as unsuitable housing has explicitly been the purported lack of housing need.

2.19 For example, in respect of Site 4, the Site Assessment summary contained in Figure 5-1 of the SOA that:

*“In conclusion, the site is not suitable for allocation in the Neighbourhood Plan as there is no housing requirement...”*

2.20 Even if one were to ignore the fact that the housing requirement has yet to be confirmed, as already noted within this report, the SOA suggests that its results are intended to be of use in the event that allocations are required.

2.21 Lack of a housing requirement does not render sites unsuitable for allocation, and to draw conclusions on this basis goes beyond the scope of the site assessment's role in the plan-making process, contradicts its stated purpose elsewhere in the SOA, and significantly undermines the usefulness of the SOA to the plan-making process. In addition, by conflating the (unresolved) issue of housing need with the assessment of a site's suitability, it risks undermining the integrity and objectivity of the SOA.

- 2.22 Furthermore, conclusions drawn based on a perceived lack of housing need also give rise to concerns that the results of the SOA will be misinterpreted by readers and decision-makers. For example, we note that in the consideration of planning application DC/20/01474 (which proposed residential development of land immediately to the east of the Site), the Parish Council's response dated 4 May 2020 very much suggests that the SOA's assessment of Site 4 have confirmed that Site 4 (and thus the adjoining land) are inherently unsuitable for development. Such confusion is understandable, given that Site 4 has been given a 'red' rating by the SOA, despite the SOA confirming it could be considered a reserve site (in the event a housing need was identified) or included in a rural exception policy, subject to consultation with the Anglian Water and the Local Planning Authority.
- 2.23 Rather than concluding that otherwise suitable sites are unsuitable due to a lack of housing need, we urge that such sites (which include Site 4) should be correctly reported by the SOA as being suitable for allocation in the event that additional sites were to be allocated through the HNP. This would preserve the objectivity and integrity of the SOA; and at the same time make clear that it is not predetermining decisions in respect of HNP allocations, and that housing need will be a relevant consideration for the HNP in considering allocations.

### 3.0 Assessment of Site Reference 4

#### Environmental Constraints

3.1 The SOA states one indicator of a site's suitability is whether it is within or adjacent to a number of the following statutory designations:

- Ancient Woodland
- Area of Outstanding Natural Beauty (AONB)
- Biosphere Reserve
- Local Nature Reserve (LNR)
- National Nature Reserve (NNR)
- National Park
- Ramsar Site
- Site of Special Scientific Interest (SSSI)
- Special Area of Conservation (SAC)
- Special Protection Area (SPA)

3.2 The SOA states that site within the above will be rated 'red'; partly within or adjacent 'amber'; and neither within or adjacent 'green'.

3.3 The indicator goes on to include the question:

*“Does the Site fall within a SSSI Impact Risk Zone and would the proposed use / development trigger the requirement to consult with Natural England”.*

However, it does not explain how the answer to this will influence the assessment.

3.4 Site 4 has been assessed as 'red' by virtue of it being adjacent to AONB and SSSI Impact Zone, and within the Additional Project Area.

3.5 Looking at each of these elements, Site 4 lying adjacent to the AONB warrants a rating of amber, as per the SOA explanation of how suitability is assessed.

- 3.6 The SOA does not explain how a site will be rated based on its being located within a SSSI Impact Risk Zone. However, a site being within such a zone does not render it intrinsically unsuitable for development and is not an absolute constraint. Certainly, it is fundamentally different to a site being located within a SSSI, and it is clearly the case that a site within a SSSI will be less suitable for development than a site within a SSSI Impact Risk Zone, when looking purely at this particular element. As such, to ensure a meaningful and robust assessment, the SOA must differentiate between sites that are within the SSSI Impact Risk Zone and those that are with the SSSI itself. Accordingly, it cannot be said that the location of Site 4 within a SSSI Impact Risk Zone would warrant a 'red' rating in itself.
- 3.7 Similarly, Additional Project Areas should not be afforded the same status as statutory designations. Furthermore, the Suffolk Coast and Heath AONB Additional Project Area has been subject to further assessment and further to this, an extension of the AONB has now been approved by the Secretary of State and this does not incorporate Site 4.
- 3.8 Attributing a 'red' rating to Site 4 does not follow the SOA scoring as explained by the SOA itself. In addition, Site 4 is not unsuitable for development in relation to this indicator, and affording it the same rating as a site that, for example, is entirely within an SSSI and AONB is clearly illogical. To ensure that the SOA is robust, accurate and provides meaningful evidence to help decision-makers differentiate between potential sites, Site 4's rating against this indicator should be amended.
- 3.9 A separate and additional decision-aiding question in respect of environmental constraints used by the SOA considers whether sites are within or adjacent to the following:
- Green Infrastructure Corridor
  - Local Wildlife Site (LWS)
  - Public Open Space
  - Site of Importance for Nature Conservation (SINC)
  - Nature Improvement Area
  - Regionally Important Geological Site
  - Other

- 3.10 Firstly, we find reference to 'other' disconcertingly vague in this instance.
- 3.11 In respect of how Site 4, this has been assessed as 'red' on the basis of it being within a Drinking Water Safeguard Zone (Surface Water).
- 3.12 Drinking Water Safeguard Zones (Surface Water) are areas identified by the Environment Agency working with water companies that influence the water quality for their respective Drinking Water Protected Area (Surface Water), which are at risk of failing the drinking water protection objectives. The designation of these areas is intended to assist the Environment Agency deliver the drinking water protection objectives of the Water Framework Directive, by identifying where action to address water contamination will be targeted. Within these areas the Environment Agency seek to carefully manage the use of certain substances to prevent the pollution of water sources that are used to provide drinking water.
- 3.13 As such, it is very much unclear why the presence of a site within such a non-statutory designation would warrant a 'red' rating, implying a site is unsuitable for development.
- 3.14 Such an approach is particularly illogical when one considers this results in a site within a LWS, public open space, and / or SINC (all constraints to development) being attributed the same rating as one that is within a Drinking Water Safeguard Zone (Surface Water).
- 3.15 The SOA should be amended to differentiate between sites that are subject to non-statutory designations which represent constraints to development (such as LWS, public open space, SINC) and those which are subject to other non-statutory designations that are less likely to render sites unsuitable for development.

### **Physical Constraints**

- 3.16 The SOA scores Site 4 amber in relation to utilities infrastructure on the basis of power lines crossing the site.
- 3.17 The power lines crossing the site are not a constraint to its development. The overhead lines present on site are not high voltage pylons, the moving of which might be prohibitively costly. Rather, these are overhead lines which can be readily addressed by being diverted or undergrounded.

- 3.18 We suggest that it is important the SOA differentiate between utilities which can be a significant constraint to development (e.g. High Voltage power lines, or high-pressure gas pipelines). and those which are readily mitigated without impacting on viability of development or limiting the amount of developable land within a site.

### **Accessibility**

- 3.19 In respect of accessibility of sites to town / local centre / shop, the SOA's assessment is based on distance in metres. If a site is over 400m from a town centre or shop, it will not be assessed as 'green'. Between 400m and 1.2km, it will be assessed as 'amber' and anything over, 'red'.

- 3.20 Site 4 has been measured as 463 from town / local centre / shop by the SOA. This results in an 'amber' rating.

- 3.21 The Chartered Institution of Highways and Transportation's Planning for Walking (2015) notes that:

*"Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres)."*

- 3.22 Furthermore, it notes that the decision to walk is not only influenced by distance but also the quality of the experience – people are likely to be willing to walk further where their surroundings are more attractive, safe and stimulating.

- 3.23 We consider that in the case of Site 4 and access to local shops, the walk would be attractive and safe.

- 3.24 As such, we consider that where shops are located 463m from Site 4, these are very much within walking distance. Far more than if, for example, the site was to be over 800m from such facilities. As with other indicators in the SOA, we feel that the approach to assessment of this indicator does not provide an appropriate differentiation between sites.

- 3.25 Similarly, it is unclear why the Site being 568m from the Primary School warrants a rating of 'amber' as opposed to 'green'. Again, we consider 568m to be very much

within walking distance, particularly when one considers that a safe and attractive route is available.

- 3.26 In the case of the accessibility of both town / local centre / shop and the Primary School, a rating of 'amber' is unjustified and should be replaced with 'green'.

### **Landscape and Visual Constraints**

- 3.27 The SOA concludes that the Site's sensitivity to development is 'high'.

- 3.28 The SOA explains that sites will be considered of high sensitivity if they have "*highly valued features*" and / or "*valued features that are highly susceptible to change*". It states that such sites can accommodate minimal change.

- 3.29 No explanation is provided within the assessment column against this particular indicator in respect of Site 4 as to how it is considered to warrant a rating of 'high' – the assessment simply states "*high*".

- 3.30 In any case, the Site cannot feasibly be considered to be highly sensitive in landscape terms.

- 3.31 The Site is located adjacent to the Suffolk Coast and Heath AONB, but it is not within it. As already noted within this document, the extent of this AONB has recently been reviewed, and the Site is not included within the enlarged AONB.

- 3.32 The Site is agricultural land which is predominantly featureless, with the exception of mature landscaping demarcating site boundaries. As the SOA recognises the site is:

*"Surrounded by the built-up area and settlement boundary on three sides".*

- 3.33 The relationship to the existing built-up area of the village clearly influences the character of the Site, as does the mature landscaping which provides a robust barrier between the Site and the AONB to the south. The Site is well contained, with the only open aspect directly relating to existing residential development to the west.

- 3.34 The Site does not contain highly valued landscape features, or features that are susceptible to development – the SOA’s criteria for a rating of ‘high’ against this indicator.
- 3.35 Vehicular access to the Site can be achieved by a new access to the north (as is recognised later within the SOA), i.e. it would not be necessary to create new access onto Hyams Lane, towards the AONB. This would enable a clear demarcation between a new village envelope incorporating development of the Site, and the AONB to the south. Furthermore, the Site is of sufficient size to be able to accommodate residential development along with additional, enhanced landscaping towards the southern end of the Site, if considered necessary / appropriate. It would be very much feasible to deliver development of the Site which integrates with the existing residential development to the north, and avoids creating a development frontage to the south.
- 3.36 For the above reasons, the rating of ‘high’ for Site 4 in respect of this indicator is wholly unjustified.

### **Heritage Constraints**

- 3.37 In relation to the indicator “*Would the development of the site cause harm to a designated heritage asset or its setting?*”, the SOA states that Site 4 would have “*some impact*”.
- 3.38 We note that the designated heritage assets are mentioned within the summary section of the SOA’s assessment of Site 4, but there is no explanation of the rating against this indicator.
- 3.39 There are listed buildings within the vicinity of the Site.
- 3.40 Hyams House (Grade II listed) is located to the west of the Site. However, more modern existing residential development is already located to the west also (along Five Acres), and Hyams House is heavily screened by mature landscaping. The impact of development of the Site on the setting of Hyams House would be nominal.
- 3.41 To the east is the Grade II listed Holbrook War Memorial and, beyond this, Grade II\* listed church. Between the Site and these designated heritage assets is a field adjoining the Site, and a fire station. Again, the potential for development of the Site

to impact on these heritage assets is considered very limited and could be readily mitigated.

3.42 We consider the SOA would benefit from greater explanation as to the potential impact of development of Site 4 on designated heritage assets, and the potential for any such impact to be appropriately mitigated. Otherwise, we consider there is a danger that a reader of the SOA (including decision-makers) could wrongly infer that this represents a significant constraint to the Site's suitability for development.

3.43 The SOA's summary of Site 4 notes that development of the Site is unlikely to have an adverse impact on heritage assets, and we suggest that this be reported against this indicator also, and the rating revised to 'no impact' accordingly.

### **Viability**

3.44 In response to the question "*Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities*", the assessment reports "*unknown*"

3.45 No abnormal costs are currently anticipated in respect of the Site's development. The Site is greenfield in agricultural use. No demolition is required, nor any land remediation anticipated.

3.46 Power lines are present on the Site, but these are not high voltage pylons, the moving of which might be prohibitively costly. Rather, these are overhead lines which can be readily addressed by being diverted or undergrounded.

### **Conclusions**

3.47 The SOA conclusions in respect of Site 4 identifies the presence of power lines as a known viability issue. However, as noted above, these are not considered to be an issue here.

3.48 The summary of assessment also implies that development of the Site would result in additional vehicular movements which would necessitate the upgrading of Hyams Lane. However, there is no evidence to support this view. On the contrary, given the modest scale of development proposed and the availability of alternatives to Hyams

Lane for vehicular traffic (including the B1080 to the east), it is considered that impact on Hyams Lane is likely to be de minimus, and certainly well short of engendering the need for it to be upgraded.

- 3.49 The summary of assessment again refers to the Site being likely to be considered to have high landscape sensitivity. However, for the reasons set out earlier within this report, we do not consider that to be the case. Whilst the SOA refers to Landscape Character Types, it is important to acknowledge that not all land within a particular landscape area will be of uniform landscape characteristics or equal sensitivity to development. The Site should be considered on its own merits, having regard to its specific characteristics. For the reasons set out already within this report, the Site is not considered sensitive in landscape terms.
- 3.50 The summary of assessment refers to proposed policies in the JLP. As already noted, the JLP has only reached the Preferred Options stage. It currently carries limited weight. It is not appropriate to deem sites unsuitable for development on the basis of policies which a) the Councils have yet to determine will be included in their JLP for submission; b) have not been tested through examination.
- 3.51 Finally, the summary of assessment concludes that the Site is unsuitable due to the lack of a housing requirement. As noted elsewhere within this review, we do not consider it appropriate for the SOA to draw conclusions on this basis. Instead, we suggest it would be more appropriate to state that the Site is suitable and that factors to consider in deciding whether to allocate include the need for housing for Holbrook.

## 4.0 Overview and Conclusions

- 4.1 It is considered that the SOA has the potential to form a useful part of the evidence base, and assist in the preparing of a Neighbourhood Plan for Holbrook.
- 4.2 However, there are a number of issues that in our view need to be addressed in order to ensure that it can form a robust part of the HNP evidence base.
- 4.3 In particular, we consider that the reliance on the view that there is not a housing need for Holbrook in concluding on the suitability of sites for residential allocation is fundamentally flawed. Not only has the extent of a housing requirement for Hobrook yet to be confirmed, but this indicator is beyond the scope of a site appraisal and risks undermining the SOA's robustness and objectivity. Indeed, the JLP is not yet at an advanced stage and should be afforded limited weight. It is not appropriate for the SOA to rely on any draft policies within it.
- 4.4 As such, we consider that the conclusions in the SOA should not be influenced at all by a view on housing requirement. The SOA may of course wish to stress that it does not allocate sites, and that the decision to allocate sites will be subject to other considerations, including whether or not there is a housing requirement for Holbrook. As a result, Site 4 should be reported as being suitable, having regard to the results of its appraisal.
- 4.5 Additionally, there are several matters in respect of the appraisal of Site 4 which we consider has resulted in it being assessed unduly negatively, and require attention to ensure that the SOA is robust. Once these have been accounted for, it becomes even apparent that the Site is suitable for residential development.
- 4.6 We wish to emphasise our desire to work with the Parish Council in the preparation of the HNP. The points we have raised are intended to assist at an early, informative stage of the process, and we trust they will be received in this manner. We would welcome the opportunity to discuss the Site and how its potential development with the Parish Council further in due course.

# **BABERGH AND MID SUFFOLK JOINT LOCAL PLAN EXAMINATION**

**Inspectors:** Malcolm Rivett BA(Hons) MSc MRTPI  
Alison Partington BA (Hons) MA MRTPI

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Tom Barker  
Assistant Director – Planning and Building Control  
Babergh and Mid Suffolk Councils

9 December 2021

Dear Mr Barker

## **Babergh and Mid Suffolk Joint Local Plan Examination**

1. Thank you for your letter of 18 November 2021 detailing the Councils' thoughts on additional work to be undertaken to address the concerns we raised at the hearing sessions about the soundness of various aspects of the plan.
2. We have now had the opportunity to reflect further on the evidence we have read and heard and to consider your letter in detail. In the light of this we currently believe that a more fundamental review than your letter proposes is likely to be necessary in respect of the settlement hierarchy, spatial distribution of housing and the housing site selection process in order to determine whether or not these aspects of the plan are sound (in essence policies SP03, SP04 and the LS01 and the LA housing allocation policies).
3. In particular we believe that the settlement hierarchy review needs to consider all tiers of settlement and the concept/boundary of the Ipswich Fringe, not just core villages, hinterland villages and hamlets. Furthermore, to ensure that the plan as a whole is robust it would also be necessary to reassess the housing allocations in all tiers of settlement, not simply market towns/urban areas and core villages. Additionally, whilst your letter proposes potentially appraising additional reasonable alternatives for the spatial distribution of housing, it is

not clear how the preferred strategy would be determined and robustly justified against these. You will recall this was a key concern we raised at the Preliminary Matter 4 Hearing Session about the existing Sustainability Appraisal, site selection process and spatial strategy formulation.

4. Moreover, as your letter details, significant additional work is also necessary in respect of open space designations (policy LP30) and housing for gypsies, travellers and travelling show-people (policy LP09).
5. Based on the indicative timetable in your letter, such work would be likely to take more than a year to carry out which is, in itself, an undesirable delay in the examination. Furthermore, it would leave the examination in an extremely difficult position if it were to be determined at that stage that these crucial aspects of the plan as submitted are not sound. Deleting and adding site allocations often proves to be a complex and difficult process during an examination.
6. We recognise that a large proportion of the housing sites allocated in the plan already have either full or outline planning permission. As a result it is very likely that the majority of them will be implemented. However, if these sites appear in the plan as allocations they have a formal planning status of significance if the existing permissions are not implemented. Consequently, notwithstanding the existing permissions, these sites need to be robustly justified in their own right against possible alternative sites and form part of a robust spatial strategy.
7. Furthermore, we understand that, across the two districts, around 90% of the housing requirement figure detailed in policy SP01 is already provided for by existing completions, sites under construction, sites with full or outline planning permission, sites with a resolution to grant planning permission subject to s106 agreement, allocations in made Neighbourhood Plans and the, reasonable, allowance for 1,000 windfall dwellings. This unusual situation means that demonstrating a supply of developable housing land for the vast majority of the plan's overall housing requirement figure is, for some years to come, unlikely to be dependent on the allocation of the housing sites included in the submitted plan.
8. Whilst we cannot reach final conclusions on the other aspects and policies of the plan at this stage (pending consultation on Main Modification and further SA/HRA work), we anticipate that, subject to the Main Modifications discussed at the hearing sessions, it is likely that we will be able to find them sound.
9. On this basis and subject to detailed discussion and consultation and necessary alteration to the Councils' Local Development Schemes, we currently consider that the most appropriate way forward would be to:

- Delete policies SP04, LP09, LP30 and the LS01 and LA housing allocation policies;
- Retain the settlement boundaries in the current (as opposed to proposed) policies map;
- Significantly modify policies SP03 and LP01 to make clear where new housing development will be permitted;
- Retain the open space designations included in the current (as opposed to proposed) policies map and retain as “saved” the relevant open space policies in the extant plans;
- Include in the plan a positively-worded policy, consistent with the PPTS, against which any applications for accommodation for gypsies, travellers and travelling show-people can be assessed;
- Modify the remaining policies in line with the discussions held at the hearing sessions.

10. In essence the plan would be a “Part 1” local plan, to be followed by the preparation and adoption of a “Part 2” local plan as soon as possible. The “Part 2” plan (and associated policies map alterations) would be likely to include:

- An up-to-date, robust settlement hierarchy;
- A spatial distribution for any housing allocations included insofar as are necessary to provide flexibility and ensure that the plan period housing requirement can be met;
- Consequent housing requirement figures for Neighbourhood Plan areas;
- Up-to-date and robustly justified settlement boundaries reflecting commitments and allocations;
- Robustly justified open space designations and a relevant development management policy;
- An up-to-date assessment of need for accommodation for Gypsies, Travellers and Travelling show-people and, if necessary, allocations to provide for this need.

Other matters may also need to be addressed dependent on the circumstances at the time and the extent to which the evidence base is up-to-date.

11. In essence the preparation of the Part 2 plan would involve the same work detailed in paragraph 2 above, but could be undertaken, outside the constraints and difficulties of a “live” local plan examination, and with the benefit of an up to date plan in place setting out a housing requirement figure and development management policies.

12. We would like to discuss this proposed way forward (and the precise Main Modifications which would be necessary to achieve it) at the Exploratory Meeting on 16 December 2021, but in the meantime feel free to contact us with any initial thoughts you have. However, at this stage we are not seeking,

nor do we envisage accepting, any comments from other parties to the examination.

Yours sincerely

*Malcolm Rivett and Alison Partington*

INSPECTORS

Our Ref: G08  
Your Ref:

Date: 18<sup>th</sup> November 2021

Malcolm Rivett BA(Hons) MSc MRTPI and Alison Partington BA(Hons) MA MRTPI  
The Planning Inspectorate

(sent via e-mail to [annette.feeney@baberghmidsuffolk.gov.uk](mailto:annette.feeney@baberghmidsuffolk.gov.uk))

Dear Inspectors,

### **Babergh and Mid Suffolk Joint Local Plan Examination – Additional work to be undertaken**

1.01 Further to the Babergh and Mid Suffolk Joint Local Plan (JLP) Hearing sessions held in the week of 18<sup>th</sup> October 2021, regarding Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process, and Matter 2 – Gypsy and Traveller, and Travelling Showpeople Provision and Boat Dwellers, this letter sets out the scope of additional work the Councils propose to undertake with a view to addressing the concerns raised by Inspector Rivett during those Sessions.

#### Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process

2.01 The scope of the additional work to review the appropriateness of the spatial strategy and the site selections will be kept within the parameters of the sites which were submitted as part of the Plan making process. This reflects the fact that the concerns relate to the 'soundness' of the submitted Plan. Therefore, the review will only be for residential sites which are registered to the Councils' Strategic Housing and Economic Land Availability Assessment (SHELAA) process as at the publication of the Regulation 19 Joint Local Plan (Nov 2021) – including the additional land at Great Blakenham referenced in Core Library Document G03 and G04, which was submitted at that time, but unfortunately was omitted from the original SHELAA process.

2.02 The Councils believe it is appropriate to constrain further assessment to the top three tiers of the settlement hierarchy (noting the changes to the hierarchy which were accepted to Great Waldingfield and Stoke by Nayland at the Matter 4 Hearing sessions). This would involve reviewing rejected SHELAA sites in the Ipswich Fringe, Market Towns and Urban Areas, and Core Villages across both districts. It will also re-consider suitable SHELAA sites in those tiers which were reduced in the Councils' assessment from their original scale as submitted at the SHELAA stage. This is proposed as a



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proportionate and justified approach as the Plan generally identifies these locations as the most sustainable locations and where the largest levels of growth should take place. The Councils estimate that approximately 250 rejected SHELAA sites will be re-considered under this method (approximately 300 sites in total were considered suitable in the original SHELAA exercise). The Councils consider it would be disproportionate to re-assess the approximately 350 rejected SHELAA sites in the lower tiers of the settlement hierarchy, having regard to the poorer sustainability credentials of those tiers.

- 2.03 Following the initial rejected SHELAA sites review, any sites which are identified as potentially suitable, will be considered further on a consistent basis through additional specialist evidence testing on heritage impact, landscape impact, highways suitability, infrastructure, flood risk and water quality/capacity. The findings of the additional testing will be considered in the final SHELAA suitability assessment.
- 2.04 Any sites which are then identified as suitable, will then be subject to Sustainability Appraisal (SA) to enable a comparable assessment to be made for each site, including the original sites assessed in the Submission Plan. Sites will be assessed on a parish by parish basis to retain consistency with the earlier assessment work.
- 2.05 An increasing and considerable volume of the objective housing needs can already be met by consented developments which the Councils believe is an important known aspect of future supply and is accordingly planned with infrastructure providers. Such consented developments form part of the baseline supply essentially because the Plan cannot withdraw existing consents. However, the Councils have noted some concerns as to whether a consent is a sufficient basis for an allocation. The Councils intend to review the planning status of all registered SHELAA sites up to the end of September 2021. Any SHELAA site (as the source for considering JLP allocations) either with extant planning permission or authority to approve subject to a S106 agreement at 30<sup>th</sup> September 2021 will be identified as a committed site for the purposes of the housing supply in Policy SP04. The Councils will consider what the implications may be of removing the identified committed sites (up to 30<sup>th</sup> September 2021) as allocations from the Plan.
- 2.06 Netting off all committed sites updated as above, the Councils propose to re-consider the spatial distribution options in the SA. This will involve consideration of the new residual SHELAA capacity following the review work on previously rejected SHELAA sites. Any reasonable alternatives can be tested again through SA, which may also identify reasonable alternative options within the settlement hierarchy categories such as the Ipswich Fringe or Core Villages.
- 2.07 Following the conclusion of the above work on both site assessment and spatial distribution reviews, the Councils will confirm the position regarding the justification for the spatial distribution pattern and allocation of sites in the Plan. The Councils will continue to present the information separately for each district, reflecting the approach taken in the preparation of the Plan.



## Matter 2 – Gypsy and Traveller, and Travelling Showpeople Provision and Boat Dwellers

3.01 The Councils outline below the scope of additional work to be undertaken, having had regard to the relevant representations to the Matter 2 Hearing issues. The Councils will engage further with relevant parties prior to commencement of the work with a view to producing Statements of Common Ground.

- i. Update the Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (May 2017) [Document EH03](#) for Babergh and Mid Suffolk Districts.
  - a) Using the methodology to assess accommodation needs in Chapter 6 (Gypsy and Traveller), Chapter 8 (Travelling Showpeople) and Chapter 10 (Boat Dwellers).
  - b) The update will need to consider the needs of both Gypsies and Travellers who meet the definition as set out in the Government's Planning Policy for Traveller Sites (Aug 2015) [Document C11](#) and those that do not.
  - c) An assessment of caravan dwellers will need to be undertaken.
  - d) Consider the data sources and evidence submitted to the JLP Examination.
  - e) Confirm needs from unauthorised developments in the Districts.
  - f) Seek to agree the approach with those involved in the JLP Examination, explaining how the needs of people who are homeless and living roadside and in homes are accounted for, together with net movement from housing and net movement into the area. References to the Councils' Strategic Housing Market Assessment – Part (May 2017) [Document EH02](#) and Partial Update (Jan 2019) [Document EH05](#).
  - g) Prepare Statements of Common Ground with the Showman's Guild and Matter 2 Hearing participants.
- ii. Undertake an exercise to identify sites for allocation to meet identified needs.
  - a) To meet the five-year supply of specific, deliverable sites, and a supply of specific, deliverable sites or broad locations for growth for the plan period in accordance with the Planning Policy for Travellers Sites.
  - b) Call for Sites exercise.
  - c) Review of existing site capacity.
  - d) Review of Council-owned land and identification of land.
  - e) Collaborative approach with partner authorities and agencies in addressing short-stay transit provision and policy approach.



- f) Review potential for net additional capacity for houseboat moorings.
- iii. Develop a proactive criteria-based policy for Gypsy and Traveller, and Travelling Showpeople proposals, to support appropriate development for those who both meet and do not meet the definition set out in the Planning Policy for Traveller Sites.

#### Matter 8 – Healthy Communities and Infrastructure Policies

4.01 The Councils are undertaking a factual review of all the open spaces identified within the Joint Local Plan together with those identified at the Regulation 19 stage and during the Examination.

4.02 By way of an example, the information will be formatted and presented in a tabular form as the example below identifies.

Name (including map links)	Parish	District	Typology	Area (ha)	Source and Description
<a href="#">Stone Street Park</a>	Crowfield	Mid Suffolk	Parks and Recreation Grounds	0.63	Amendment to existing Local Plan designation. Park with children’s play area and Multi Use Games Area (MUGA) for informal football and basketball.

#### Matter 9 – Allocation Sites for Housing and Other Development and Settlement Boundaries

5.01 The Councils recognise the additional tasks required for Matter 9 that are included in the proposed programme of work, namely a review of the appropriateness of specific settlement boundaries in respect of:

- a) recent permissions for development outside settlement boundaries;
- b) any made or likely soon to be made Neighbourhood Plans which allocate sites outside settlement boundaries; and
- c) representations objecting to settlement boundaries in specific locations.

5.02 The Councils will also review the site allocation policies to ensure a consistent approach to the number and detail of policy criteria, engaging with site promoters and statutory consultees who are objecting to the criteria.

5.03 The Councils anticipate that this work can be undertaken in parallel with the work to be undertaken on Matters 2, 4 and 8.

#### Other Matters

6.01 In addition to the specific Matters set out earlier in this letter, the Councils continue to address all the actions arising from the respective Examination Hearing sessions and will complete these tasks alongside the additional work identified.



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## Timescale

Task	Duration	Description
<b>Matter 4 – Settlement Hierarchy, Spatial Distribution of Housing and Housing Site Selection Process – up to 12 months</b>		
1) Review of Strategic Housing and Economic Land Availability Assessment (SHELAA)	Two months	Initial review of discounted sites in the three top tiers of the settlement hierarchy.
2) Specialist evidence updates for Matter 4 – Spatial Distribution and Site Selection	Four months to six months (to be determined)	Specialist evidence updates to follow the initial review of discounted sites. Timings depended upon if more detailed assessments are required.
3) Sustainability Appraisal	Four months	To follow specialist evidence assessments.
4) Review of Sustainability Appraisal findings and Councils' statements	Two months	To follow Sustainability Appraisal.
<b>Matter 2 – Gypsy and Traveller, and Travelling Showpeople Provision and Boat Dwellers – six months</b>		
5) Gypsy and Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) update (including Caravan Dwellers Needs)	Three months	To update the current identified needs.
6) Assessment of sites for Gypsy and Traveller provision	Six months	To be undertaken alongside and after the ANA update.
7) Review potential for net additional capacity for houseboat moorings	Six months	To be undertaken alongside and after the ANA update.
<b>Matter 8 – Healthy Communities and Infrastructure Policies – four months</b>		
8) Factual review of open spaces identified in the JLP plus sites identified at Regulation 19 stage and through Examination	Four months	Site visits to be undertaken.
<b>Matter 9 – Allocation Sites for Housing and Other Development and Settlement Boundaries – six months</b>		
9) Appropriateness of specific settlement boundaries	Six months	Conclusion of this task has a dependency upon Matter 4 work.
10) Review site allocations policy criteria	Six months	As set out in paragraph 5.02.



6.02 We trust this would be an acceptable way forward to you and we look forward to discussing this proposed programme of work further with you.

Yours sincerely



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