

# Holbrook Neighbourhood Plan

Site Options Assessment

Holbrook Parish Council

December 2019

#### Quality information

Prepared by	Checked by	Verified by	Approved by
Stephanie Brewer Principal Planner	Una McGaughrin Associate Director	Una McGaughrin Associate Director	Una McGaughrin Associate Director
Jessica Cooke			

#### **Revision History**

Graduate Planner

Revision	Revision date	Details	Authorized	Name	Position
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#### Prepared for:

Holbrook Parish Council

#### Prepared by:

AECOM Infrastructure & Environment UK Limited Aldgate Tower 2 Leman Street London E1 8FA United Kingdom aecom.com

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#### Disclaimer

This document is intended to aid the preparation of the Neighbourhood Development Plan (NDP) and can be used to guide decision making and as evidence to support NDP policies, if the Qualifying Body (QB) so chooses. It is not a neighbourhood plan policy document. It is a 'snapshot' in time and may become superseded by more recent information. The QB is not bound to accept its conclusions. If landowners or any other party can demonstrate that any of the evidence presented herein is inaccurate or out of date, such evidence can be presented to the QB at the consultation stage. Where evidence from elsewhere conflicts with this report, the QB should decide what policy position to take in the NDP and that judgement should be documented so that it can be defended at the Examination stage.

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#### **Abbreviations used in the report**

#### **Abbreviation**

ANOB	Area of Outstanding Natural Beauty	
APA	Additional Project Area	
BMSDC	Babergh and Mid Suffolk District Councils	
BMSJLP	Babergh and Mid Suffolk Joint Local Plan	
На	Hectare	
HNP	Holbrook Neighbourhood Plan	
HPC	Holbrook Parish Council	
LP	Local Plan	
MHCLG	Ministry of Housing, Communities and Local Government	
NDP	Neighbourhood Development Plan	
NP	Neighbourhood Plan	
NPA	Neighbourhood Plan Area	
NPPF	National Planning Policy Framework	
PPG	Planning Practice Guidance	
RHS	Royal Hospital School	
SHELAA	Strategic Housing and Economic Land Availability Assessment	
SSSI	Site of Special Scientific Interest	
TPO	Tree Preservation Order	

# **Executive Summary**

This report is an independent site assessment for the Holbrook Neighbourhood Plan (HNP) on behalf of Holbrook Parish Council (HPC), commissioned as part of the Locality and MHCLG Neighbourhood Planning programme.

The HNP is being prepared in the context of Babergh and Mid Suffolk District Councils (BMSDC) Local Development Framework. The policy framework is comprised of Babergh Core Strategy (2014), the Babergh Local Plan Saved Policies (2006) and the emerging Babergh and Mid Suffolk Joint Local Plan (BMSJLP), with Preferred Options published in July 2019.

Holbrook itself is a sustainable village consisting of a number of services and facilities including a fire station, GP surgery, a primary and secondary schools, Coop shop, sports centre and two pubs. The Core Strategy (Policy CS2) and the BMSJLP (Policy SP03) designate Holbrook as a 'Core Village' which will act as a focus for development within its functional cluster. The same policy designates Lower Holbrook as a 'Hamlet'; however, none of the identified sites are located in Lower Holbrook.

The adopted and emerging Local Plans for the District set the framework for Neighbourhood Plans and provide an overall strategic direction for development, whilst enabling the finer detail to be determined through the neighbourhood planning process. BMSJLP Policy SP04 requires Neighbourhood Plans to plan to deliver the housing requirements set for each NPA. The policy states that Holbrook has a requirement of 68 dwellings.

At the start of the neighbourhood planning process the HPC expected to need to allocate sites for housing to meet identified development needs. However, while the NPA does have housing requirement of 68 dwellings as set out in the BMSJLP however, this is considered to be met given recent development and planning permissions as confirmed by a Planning Officer at BMSDC by email on 30/10/2019.

Given that the housing requirement has already been met through recently completed development and sites with planning permission, there is no requirement to allocate additional sites in the Neighbourhood Plan for housing. It is possible, however, for the NP to allocate additional sites if there was evidence that a particular type of development (was needed in the village that was not being met through the existing commitments and completions. It is also possible to allocate 'reserve' sites that would support development if more development was needed in future or if the current planning permissions were not implemented. The Parish Council may also wish to explore bringing housing forward on rural exception sites, that can be allocated for affordable housing in locations that are exceptions to current policy.

Therefore, it has been agreed with the Neighbourhood Plan production group that this report will provide an assessment of new sites submitted through the Call for Sites as well as other known sites (including sites submitted as part of the Local Plan process) to allow HPC to make decisions about Neighbourhood Plan policies and to explore possible reserve sites for allocation and rural exception sites for affordable housing.

Eight sites have been identified in total for this site assessment. This includes seven sites identified in the Neighbourhood Plan Call for Sites and one site from the Council Call for Sites. Three of the sites submitted through the Neighbourhood Plan sites have 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 is not included in this assessment.

The report concludes that three of the seven remaining sites are not suitable for housing allocation (Site 2 part 1, Site 5 and 6).

Four sites (Site 1, 2 part 2, 4 and 7) are potential candidates for allocation for a small amount of housing as reserve or contingency sites if required, or as rural exception sites, subject to the identified constraints being resolved.

One site within the NPA was found to be potentially suitable and available for allocation for education use in the HNP (the Royal Hospital School site) subject to discussions with the Local Education Authority (Suffolk County Council) and the Local Planning Authority.

The Parish Council should discuss its intentions with regards to site allocations with BMSDC to confirm that the housing requirement has been met and that it is not expected to meet an additional housing need. If this is the case, the results of this report can be used to guide decision making on future development in the parish, or be used to support the allocation of reserve sites or as locations for affordable housing through a rural exception policy.

# 1. Introduction

# **Background**

- 1.1 AECOM has been commissioned to undertake an independent site assessment for the Holbrook Neighbourhood Plan (HNP) on behalf of Holbrook Parish Council (HPC) as part of the Locality and MHCLG Neighbourhood Planning programme.
- 1.2 Site selection and allocation is one of the most contentious aspects of planning, raising strong feelings amongst local people, landowners, developers and businesses. It is important that any selection process carried out is transparent, fair, robust and defensible and that the same criteria and thorough process is applied to each potential site. Equally important is the way in which the work is recorded and communicated to interested parties, to ensure that the approach is transparent and defensible.
- 1.3 The Neighbourhood Plan preparation is led by HPC. The Neighbourhood Plan Area (NPA) consists of the village of Holbrook and the hamlet of Lower Holbrook on the Shotley peninsular in Suffolk. The Boundaries of the Parish Council and the NPA are synonymous. See Figure 1-1.
- 1.4 The NPA was designated in April 2018 and the HPC are in the early stages of preparing the Plan. While there is no formal themes or vision documents available publicly at the time of writing, the key themes, as communicated by HPC, for the Neighbourhood Plan are: AONB and Environment, Village Character, Lighting, Housing, Education, Flooding and future need.
- 1.5 The early engagement on the Neighbourhood Plan has had an environmental and housing focus. The clear message coming out of the engagement is that residents are concerned about large scale development but accept that some development will have to happen (survey May 2019). In addition, there are concerns over ribbon development.
- 1.6 There are a number of transport links connecting the NPA to surrounding districts. The B1080 links Holbrook to Ipswich to the north and Manningtree to the south west. Manningtree is the nearest train station with links to Norwich, Ipswich and London. Bus routes link Lower Holbrook with Ipswich to the north and Shotley Gate to the east. However, HPC report that bus routes have diminishing timetables and infrequent services, with some routes being cancelled altogether.
- 1.7 Given Holbrook's peninsular location, there is only one road in and out, resulting in highway capacity concerns. The HPC have informed AECOM of these access issues experienced and it is voiced by many in the community. This is demonstrated in the quantity of objection comments to Planning Application ref. DC/17/06037¹. However, at the time of writing, no Highways Assessment is available to formally evidence this issue. In addition, the capacity of the roads in and around the NPA may pose a constraint to development. The cumulative impact of a number of sites being developed is a concern to residents as well as the impact from development in other neighbouring villages such as Stutton. If a Highways Assessment becomes available at a later date as the Neighbourhood Plan evolves, HPC should take its results into account if allocating sites.
- 1.8 There are several built environment considerations within the NPA. There are over 50 Listed Buildings, with a large number clustered around the RHS. There are a number of 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, the Grade II\* listed Royal Hospital School and Grade II associated buildings.
- 1.9 Holbrook has a range of services and facilities. The RHS (an independent day and boarding school which HPC notes plays an important role in the local economy), a fire station, GP surgery, a state funded primary and secondary school, Coop shop, sports centre and two pubs.

<sup>&</sup>lt;sup>1</sup> Available at: <a href="https://planning.baberghmidsuffolk.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=P0HEPJSHLED00">https://planning.baberghmidsuffolk.gov.uk/online-applicationDetails.do?activeTab=neighbourComments&keyVal=P0HEPJSHLED00</a>

- 1.10 The Neighbourhood Plan Housing Needs Assessment (HNA) produced by AECOM demonstrates that the NPA has an ageing population. This is important to consider as it is likely to require different types of housing and suitable locations for this type of housing in relation to accessibility to the village centre, services and facilities. In addition to this, HPC have communicated a perceived need for affordable housing, which is further evidenced in the HNA as there is no tenure affordable to those on a Lower Quartile Income.
- 1.11 In terms of environmental assets and constraints to development, the NPA encompasses and is close to a variety of high-quality landscapes. An assessment of landscape is being carried out which is not yet available to AECOM. Once complete, this should be a key piece of evidence for the Neighbourhood Plan and read in conjunction with this report when considering sites for allocation. Any comment on landscape within this report is based on existing information and site visit observations only and does not constitute specialist landscape advice.
- 1.12 Alton Water Reservoir sits partially within the NPA. The Suffolk Coast and Heaths Management Plan² states that to the north of the settlement, the landscape is classified as Ancient Estate Claylands. While most of the landscape of the settlement is classified as Rolling Estate Farmlands, with smaller sections of Valley Meadowlands and Plateau Estate Farmlands. The Stour Estuary to the south of the NPA is designated as a SSSI.
- 1.13 The Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) falls within NPA to the east and south, while the whole NPA is covered by an Additional Project Area (APA). The APA refers to areas adjacent to the AONB that share many similar landscape features. These areas are managed in the same way as the statutory designated AONB to protect and enhance their landscape and heritage<sup>3</sup>.
- 1.14 The proximity of the AONB has the potential to constrain growth. This is evidenced in a previous planning application, which was refused on a site close to the boundary, due to impacts on the views and functioning of the ANOB (Planning Application ref. DC/17/04918<sup>4</sup>).
- 1.15 Some further potential constraints that may restrict development in the area, as communicated by the HPC, is the linear or 'ribbon' development of Holbrook village which is centred on a single road and therefore means that progressive development along the road is located at increasingly unsustainable distances from the settlement centre and services. There are also concerns about local infrastructure, such as water and electricity supplies and especially roads and local schools, that are deemed to be at near full capacity, although no formal evidence of this has been available to AECOM at the time of writing.
- 1.16 The Local Authority is Babergh and Mid Suffolk District Councils (BMSDC) and the Local Development Framework includes the Babergh Core Strategy<sup>5</sup> (adopted 2014) and the Babergh Local Plan Saved Policies<sup>6</sup> (adopted, 2006). The emerging Babergh and Mid Suffolk Joint Local Plan (BMSJLP) is currently at Regulation 18 stage, with Preferred Options published in July 2019<sup>7</sup>.
- 1.17 Neighbourhood Plans are required to be in conformity with the strategic policies of the adopted Local Plan as well as having regard to the emerging Local Plan. Neighbourhood Plans can add value to the development plan by developing policies and proposals to address local place-based issues. The intention, therefore, is for the Local Plan documents (adopted and emerging) to provide a clear overall strategic direction for development in Holbrook, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

<sup>&</sup>lt;sup>2</sup> http://www.suffolkcoastandheaths.org/assets/AONB-Management-Plan-20132018.pdf

<sup>3</sup> Ibid

<sup>&</sup>lt;sup>4</sup> https://planning.baberghmidsuffolk.gov.uk/online-

applications/applicationDetails.do?activeTab=documents&keyVal=OWZFQ2SHIIA00

<sup>&</sup>lt;sup>5</sup> https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Babergh-Core-Strategy/CORE-STRATEGY-AND-POLICIES-FINAL-Feb-2014.pdf

<sup>&</sup>lt;sup>6</sup> https://www.midsuffolk.gov.uk/assets/Strategic-Planning/scheduleofsavedpoliciesBaberghLP.pdf

<sup>7</sup> https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLP-Reg18-2019/BMSDC-JLP-2019-Part-1-Objectives-and-Strategic-Policies.pdf

- 1.18 The Babergh Core Strategy (2014) and Babergh Local Plan Saved Policies (2006) both include policies to guide housing allocation, yet neither provides specific housing number requirements for Holbrook.
- 1.19 The emerging BMSJLP will plan for development across the two districts to 2036. The authorities jointly conducted a Call for Sites in 2014 and 2016. The Regulation 18 Draft Local Plan was published in July 2019 with consultation running from 22<sup>nd</sup> July 2019 to 30<sup>th</sup> September 2019. It contains a requirement of 68 dwellings for the NPA. The Councils consider this requirement to have already been met through the development of the 'Admirals Quarter', which is almost completely built out, accommodating 78 dwellings, and the one site identified in the BMSJLP which has outline planning permission for seven dwellings. There is therefore currently no outstanding obligation for land to be allocated to address the housing requirement in Holbrook.
- 1.20 The Parish Council should discuss its intentions with regards to site allocations with BMSDC to confirm that the housing requirement has been met and that it is not expected to meet an additional housing need. If additional development was needed in future or if extant planning permissions were not implemented the results of this report can be used to guide decision making on future development in the village, or be used to support the allocation of reserve sites or as locations for affordable housing through a rural exception policy.
- 1.21 The eight sites identified for assessment include seven proposed for housing and one proposed for education. Seven sites were identified through the Neighbourhood Plan 'Call for Sites' in 2019 and one site was submitted to the Council's Call for Sites. Of these eight sites in total, three sites (SS0201, SS0215 and SS0717) were assessed in the local authority's 2017 Strategic Housing and Economic Land Availability Assessment (SHELAA). One site in Holbrook (SS0717) was included with a revised site boundary in the 2019 SHELAA and this already has planning permission, therefore is not included in this assessment. The 2019 SHELAA supersedes the 2017 version meaning all sites previously included in the 2017 SHELAA but no longer included in the 2019 iteration were discounted for various reasons including heritage sensitivity, connectivity to existing settlement and no potential for suitable access<sup>8</sup>.
- 1.22 The report concludes that three of the seven remaining sites are not suitable for housing allocation (Site 2 part 1, Site 5 and 6).
- 1.23 Four sites (Site 1, 2 part 2, 4 and 7) are potential candidates for allocation for a small amount of housing as reserve or contingency sites if required, or as rural exception sites, subject to the identified constraints being resolved.
- 1.24 One site within the NPA was found to be potentially suitable and available for allocation for education use in the HNP (the Royal Hospital School site) subject to discussions with the Local Education Authority (Suffolk County Council) and the Local Planning Authority.
- 1.25 This assessment in itself does not allocate sites and HPC are under no obligation to allocate sites included in this assessment or from any other sources. It is the responsibility of the HPC to decide, guided by this report and other relevant available information, whether to allocate sites and if so, which sites to select for allocation, to best address the Neighbourhood Plan objectives.
- 1.26 Figure 1-1 provides a map of the designated Holbrook Neighbourhood Plan Area.

Methodology chapter of 2019 SHELAA: <a href="https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Draft-BMSDC-Joint-SHELAA-Report-July-2019-v2.pdf">https://www.babergh.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Draft-BMSDC-Joint-SHELAA-Report-July-2019-v2.pdf</a>

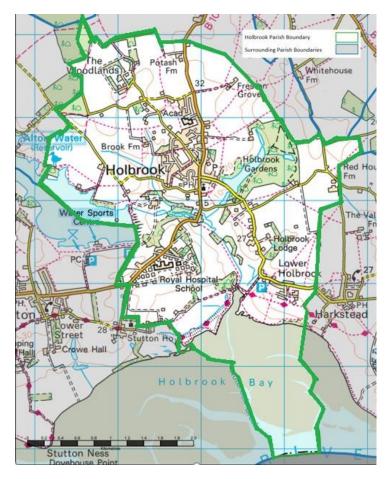


Figure 1-1: Holbrook Neighbourhood Plan Designated Area (2018)

Source: Extract from Holbrook Neighbourhood Plan Webpage.9

# 2. Planning Policy and Evidence Base

- 2.1 All Neighbourhood Development Plan (NDP) policies and site allocations must be in accordance with national planning guidance of the most recent NPPF and PPG, the strategic policies of the adopted Development Plan and have regard to the emerging Local Plan.
- 2.2 The key documents for the BMSDC planning framework include:
  - Babergh Core Strategy, 2014;
  - · Babergh Local Plan, 2006 Saved Policies; and
  - The emerging Babergh and Mid Suffolk Joint Local Plan (Regulation 18 Preferred Options Document published July 2019).
- 2.3 The key evidence base documents include:
  - Babergh and Mid Suffolk District Councils Interactive Web Map Layers<sup>10</sup>;
  - Suffolk Coast and Heaths Area of Outstanding Natural Beauty Management Plan; and
  - Babergh and Mid Suffolk Joint Local Plan: Strategic Housing and Economic Land Availability (SHELAA), Draft 2019.

<sup>&</sup>lt;sup>9</sup> <a href="https://www.babergh.gov.uk/planning/neighbourhood-planning/neighbourhood-planning-in-babergh/holbrook-neighbourhood-planning-in-babergh/holbr

<sup>10</sup> http://maps.midsuffolk.gov.uk/

2.4 Other evidence includes the Housing Needs Assessment (2019).

### **National Planning Policy Framework (2019)**

- 2.5 NPPF<sup>11</sup> (2019) paragraph 69 states that neighbourhood planning groups should consider the opportunities for allocating small and medium sized sites (less than one hectare) suitable for housing in their area.
- 2.6 Paragraph 78 states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
- 2.7 Paragraph 79 states that planning policies should avoid the development of isolated homes in the countryside.

## **Adopted Babergh Core Strategy (2014)**

#### **Policy CS2: Settlement Pattern Policy**

- 2.8 The adopted development plan for Babergh covers a plan period to 2031. It states that most new development in Babergh will be directed sequentially to the towns / urban areas, and to the Core Villages and Hinterland Villages. In all cases the scale and location of development will depend upon the local housing need, the role of settlements as employment providers and retail/service centres, the capacity of existing physical and social infrastructure to meet forecast demands and the provision of new/enhanced infrastructure, as well as having regard to environmental constraints and the views of local communities as expressed in parish/community /neighbourhood plans.
- 2.9 Holbrook is identified as a Core Village. Core Villages will act as a focus for development within their functional cluster and, where appropriate, site allocations to meet housing will be made in the Site Allocations document.

#### Policy CS11: Strategy for Development for Core and Hinterland Villages

- 2.10 Proposals for development in Core Villages will be approved where proposals score positively when assessed against Policy CS15 and the following matters are addressed to the satisfaction of the local planning authority where relevant and appropriate to the scale and location of the proposal:
  - the landscape, environmental and heritage characteristics of the village;
  - the locational context of the village and the proposed development (particularly the AONBs, Conservation Areas, and heritage assets);
  - site location and sequential approach to site selection (firstly looking within the built-up area of the village, then sites that adjoin the built-up area and sites that do not adjoin will only be considered if there is special justification);
  - locally identified need housing and employment, and specific local needs such as affordable housing;
  - · locally identified community needs; and
  - cumulative impact of development in the area in respect of social, physical and environmental impacts.
- 2.11 Rural Development and Core Strategy Policy CS11 Supplementary Planning Document (SPD)<sup>12</sup> further details how this policy should be interpreted. Firstly, it states to be considered under Policy CS11 proposals must be in or adjacent to a Core Village. However, consideration must be given to how well it is related to the village in terms of connection to jobs, facilities,

<sup>&</sup>lt;sup>11</sup>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/810197/NPPF\_Feb\_2019\_r

<sup>&</sup>lt;sup>12</sup> Available at https://www.babergh.gov.uk/assets/Strategic-Planning/SPD-Babergh/CS11-SPD-Adoption-Version.pdf

services, sustainable transport links, whether it would constitute ribbon development and whether the proposal constitutes a logical extension of the built-up area.

#### Policy CS15: Implementing Sustainable Development in Babergh

2.12 The relevant part of the policy for housing allocation states that an appropriate level of services, facilities and infrastructure must be available or provided to serve the proposed development.

#### **Policy CS20: Rural Exception Sites**

- 2.13 The Council will take a flexible approach to the location of rural exception sites in the district, and will allow proposals adjacent, or well related, to the settlement development boundaries of Core and Hinterland Villages where:
  - the development complies with other relevant policies in the Core Strategy and Policies document, particularly Policy CS15;
  - the proposed development will not exceed the identified local need (including need identified in other settlements within the same or adjacent / adjoining functional cluster(s));
  - the type of dwellings to be provided are consistent with the needs identified by the housing needs survey and agreed in advance by the District Council; and where
  - the proposed development is appropriate to the size / scale and character of the village, and is acceptable in terms of other detailed considerations such as site location and circumstances, design, layout, materials, landscaping, biodiversity, impacts on the countryside, amenity, and access, etc.

#### **Policy CS3: Strategy for Growth and Development**

2.14 Proposals for employment uses that will contribute to the local economy and increase the sustainability of Core Villages will be promoted and supported where appropriate in scale, character and nature to their locality.

## **Babergh Local Plan Saved Policies (2006)**

#### Policy HS31 and HS32 Public Open Space

- 2.15 Housing proposals are required to provide 10% of gross site area as public open space.

  Alternatively, if the site is less than 1.5ha, a financial contribution to secure open space on a nearby site or to improve existing provision can be provided.
- 2.16 While this policy does not affect the allocation of land for housing, it will affect housing capacity on sites above 1.5ha (Site 1, Site 2 part 1 and 2, Site 3, Site 4 and Site 6) if the whole site were to be developed.

#### **Policy CRO2 Areas of Outstanding Natural Beauty**

2.17 The landscape of the Suffolk Coast and Heaths AONB will be safeguarded through the strict control of development. Unless there is an overriding national need for development having a significant impact in the particular location and no alternative site is available, such developments will not be allowed. Due regard will be given to the provisions contained within the Suffolk Coast and Heaths Management Strategies.

#### **Policy CR04 Special Landscape Areas**

- 2.18 Development proposals in Special Landscape Areas (Stour Valley) will only be permitted where they:
  - maintain or enhance the special landscape qualities of the area, identified the relevant landscape appraisal; and
  - are designed and sited to harmonise with the landscape setting.

# Babergh and Mid Suffolk Joint Local Plan Preferred Options (2019)

- 2.19 The emerging BMSJLP (Regulation 18 Preferred Options Draft) was published in July 2019. The emerging Local Plan is supportive of Neighbourhood Plans and specifically states that "Neighbourhood Plan groups have an opportunity to work with the relevant District Council in order to share information and bring sites forward for allocation where they would assist to meet the levels of growth in the Joint Local Plan."
- 2.20 Holbrook lies within the Recreational disturbance Avoidance and Mitigation Strategy (RAMS) 13km Zone of Influence. The intention of the strategy is to avoid adverse effects on the integrity of the Habitats Sites in combination with other plans and projects, over the lifetime of the Local Plan.
- 2.21 It also designates Holbrook as a 'Core Village' and Lower Holbrook is designated as 'Hamlet Village'.

#### **Policy SP03 on Settlement Hierarchy**

- 2.22 Core Villages will act as a focus for development, which will be delivered through site allocations in the Joint Local Plan and/or in Neighbourhood Plans, and windfall development in accordance with the relevant policies.
- 2.23 Settlement boundaries have been created to demonstrate the extent of land which is required to meet the development needs of the Plan.

#### **Policy SP04 on Housing Spatial Distribution**

- 2.24 To assist with delivery of the overall district housing need requirements, designated Neighbourhood Plan areas will be expected to plan to deliver the minimum housing requirements between 2018 and 2036. Neighbourhood Plan documents can seek to exceed these requirements, should the unique characteristics and planning context of the designated area enable them to do so.
- 2.25 The minimum housing requirement figure for the HNP, is for 68 dwellings. This requirement has already been met through net outstanding dwellings (accounting for 58 dwellings) and site allocation (accounting for 10 dwellings) since 2018.

#### Policy LP32: Health and Education Provision

2.26 The Councils will respond positively to and support appropriate and well-designed applications regarding the creation of new health and/or education facilities, and extensions to existing facilities (CS/D1 Class Uses). The Councils will apply the presumption in favour of the development.

#### **Policy LP19: Area of Outstanding Natural Beauty**

- 2.27 The Councils will support development in or near the AONB that:
  - Gives great weight to conserving and enhancing the landscape and scenic beauty;
  - Does not adversely affect the character, quality views and distinctiveness of the AONB or threaten the public enjoyment of these areas; and
  - Supports the wider environmental, social and economic objectives as set out in the AONB Management Plan.

#### Policy LA068 Allocation: Land east of Ipswich Road, Holbrook

2.28 This policy allocates the one site in Holbrook, is it 0.3 ha and can accommodate approximately 10 dwellings (with associated infrastructure). This allocation together with recent development goes to address the draft housing requirement<sup>13</sup>.

<sup>&</sup>lt;sup>13</sup> This site has since gained planning permission for 7 dwellings.

Policies Map Key Residential Allocations Strategic Employment Sites (SP05) Settlement Boundaries (SP03) District Boundaries Parish Boundaries (where large settlements span multiple parish Areas of Outstanding Natural Beauty (LP19) Proposed Extensions to Areas of Outstanding Natural Beauty Local Nature Reserve Sites of Special Scientific Interest Special Protection Areas Designated Open Spaces (LP28) Ancient Woodland Conservation Area Holbrook BABERGH DISTRICT COUNCIL Registered Parks and Gardens

Figure 2-1 illustrates the designations and allocation in Holbrook.

Figure 2-1 Designations and Allocations in Holbrook (2019)

Source: Extract from BMSJLP

2.29 HPC should monitor the progress of the BMSJLP as the Neighbourhood Plan advances.

# **Babergh and Mid Suffolk District Councils Interactive Web Map Layers**

- 2.30 Figure 2-2 are taken from the Babergh and Mid Suffolk District Councils Interactive Web Map Layers, showing;
  - Special Landscape Area designation (hatched in green);
  - The location of Listed Buildings (marked in orange dots);
  - Tree Preservation Orders (TPOs) (marked in bright/solid green); and
- 2.31 Environmental Designations covering the Parish include:
  - Stour Estuary SSSI Impact Risk Zone (not shown on map);
  - Suffolk Coast and Heaths AONB (not shown on map); and

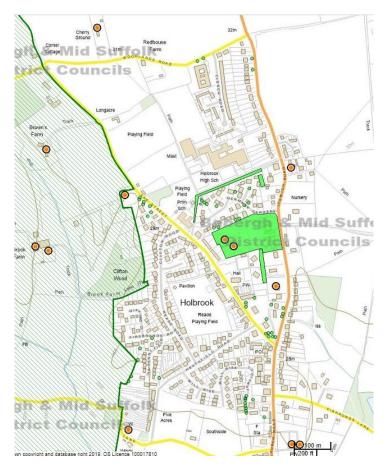


Figure 2-2 Planning and environmental designations in Holbrook.

Source: Extract from interactive policy map.

# **Suffolk Coast and Heaths Area of Outstanding Natural Beauty Management Plan**

- 2.32 While this plan is not a statutory document, it should be considered when assessing sites given the vision, aims and objectives it sets out for the area.
- 2.33 Most importantly it states that planning decisions should take into account and enhance the AONB area. This is important for Holbrook as the area falls adjacent to its boundary and the whole neighbourhood area is an Additional Project Area (APA). This means planning decisions will be subject the same measures as they would be if located in the statutory designated AONB.
- 2.34 Figure 2-3 shows the current AONB boundary and the APA. Figure 2-4shows the potential boundary expansion of the AONB.

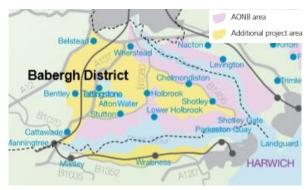


Figure 0-1 Map of AONB and Additional Project Area

Source: Suffolk Coast and Heaths AONB Management Plan.

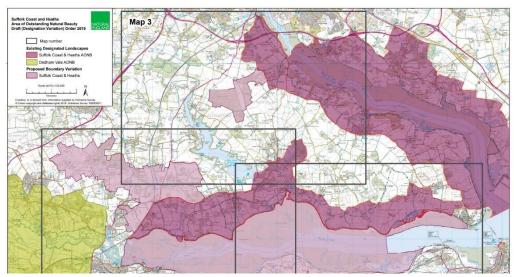


Figure 0-2 Existing and potential expansion of AONB

Source: Natural England<sup>14</sup>

 $<sup>^{14} \</sup> Available \ at: \ \underline{https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/775548/sch-aonb-draft-order-2019-key-map.pdf}$ 

# 3. Methodology

- 3.1 The approach undertaken in the site appraisal is based on the Government's National Planning Policy Framework (2019) and associated National Planning Practice Guidance<sup>15</sup> published in 2014 with ongoing updates, which includes guidance on the assessment of land availability and the production of Neighbourhood Plans.
- 3.2 Although a Neighbourhood Plan is at a smaller scale than a Local Plan, the criteria for assessing the suitability of sites for housing are still appropriate. This includes an assessment of whether a site is suitable, available and achievable.
- 3.3 In this context, the methodology for carrying out the site appraisal is presented below. This methodology was agreed with Locality<sup>16</sup> as appropriate for Holbrook.

### Task 1: Identify Sites to be included in the Assessment

- 3.4 The first task is to identify which sites should be considered as part of the assessment. This included sites identified in the Holbrook Neighbourhood Plan Area through:
- The SHELAA 2017 and SHELAA 2019 revision;
- Planning applications with planning permission;
- Planning applications pending consideration; and
- Sites identified by the Neighbourhood Plan Group.

## **Task 2: Sifting Process**

- 3.5 In task 2, sites that are clearly not suitable for development are screened out. This includes sites where there is evidence that development would directly conflict with a national planning policy objective or statutory environmental designation.
- 3.6 The criteria against which sites will be assessed at this stage are based on the following:
- National planning policy, e.g. avoiding isolated development in the open countryside;
- Avoidance of areas identified as having a high risk of flooding; and
- National environmental designations (both statutory and non-statutory).
- 3.7 Following the completion of the initial sift, sites are assigned one of three categories:
  - a) Not suitable for development and therefore not appropriate for allocation in the Neighbourhood Plan, based on the sifting stage.
  - b) To be taken forward for a high-level assessment –for sites that have not been ruled out at the sifting stage but have already been assessed through the SHELAA or a planning application.
  - c) To be taken forward for a detailed site pro-forma assessment for sites that have not been ruled out at the sifting stage and have not been assessed through the SHELAA or a planning application.
- 3.8 Points a) and b) relate to sites that have previously been assessed in the SHELAA or a planning application and therefore their suitability does not need to be fully re-assessed. Instead the SHELAA and/or planning application conclusions will be reviewed, alongside any other relevant material considerations such as planning history, to evaluate whether the sites are potentially suitable to be allocated within the Neighbourhood Plan.

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<sup>15</sup> https://www.gov.uk/government/collections/planning-practice-guidance

https://locality.org.uk/

3.9 Point c) is for sites that have yet to be assessed through the planning system. These sites will be assessed to establish whether they are potentially suitable for development and if so, whether they are appropriate for allocation in the Neighbourhood Plan.

#### **Task 4: Site Assessment**

- 3.10 Sites are assessed according to which of the categories they fall into above, in Task 2.
- 3.11 Sites that have previously been assessed through the SHELAA or a planning application will be assessed at a high level within this appraisal against a range of planning criteria (based on the Neighbourhood Plan's aims and objectives).
- 3.12 Sites that have not previously been assessed through a SHELAA or a planning application will be assessed in more detail using an assessment pro-forma.
- 3.13 A site appraisal pro-forma has been developed by AECOM to assess potential sites for allocation in the Neighbourhood Plan. It has been developed based on the Government's National Planning Practice Guidance, the Site Assessment for Neighbourhood Plans: A Toolkit for Neighbourhood Planners (Locality, 2015)<sup>17</sup> and the knowledge and experience gained through previous Neighbourhood Planning site assessments. The purpose of the pro-forma is to enable a consistent evaluation of each site against an objective set of criteria.
- 3.14 The pro-forma utilised for the assessment enabled a range of information to be recorded, including the following:
- General information:
  - Site location and use; and
  - Site context and planning history.
- Context:
  - Type of site (greenfield, brownfield etc.); and
  - Planning history.
- Suitability:
  - Site characteristics;
  - Environmental considerations;
  - Heritage considerations;
  - Community facilities and services; and
  - Other key considerations (e.g. flood risk, agricultural land, tree preservation orders).
- Availability
- 3.15 As stated above, a full proforma was only completed for those sites not already assessed through the SHELAA and/or a planning application.

#### Task 5: Consolidation of Results

- 3.16 Following the site visit, the desk top assessment was revisited to finalise the assessment and compare the sites to judge which were the most suitable to meet the housing requirement.
- 3.17 All the site assessment information is drawn together into a summary table which ranks sites from most to least appropriate for allocation in the Neighbourhood Plan, based on the level of constraints and issues identified which would need to be resolved or mitigated.
- 3.18 A 'traffic light' rating of all sites has been given based on whether the site is an appropriate candidate to be considered for allocation in the Neighbourhood Plan. The traffic light rating

<sup>&</sup>lt;sup>17</sup> https://neighbourhoodplanning.org/toolkits-and-guidance/assess-allocate-sites-development/

- indicates the following judgement, based on the three 'tests' of whether a site is appropriate for allocation i.e. the site is **suitable**, **available** and **achievable**:
- 'Green' is for sites free from constraints, or which have constraints that can be resolved, and therefore are suitable for development. Sites rated green are appropriate for allocation for proposed use in a neighbourhood plan (if it is viable).
- 'Amber' sites have constraints that would need to be resolved or mitigated, so the site is potentially appropriate for allocation (if also viable) for proposed use in a neighbourhood plan.
- 'Red' sites are unsuitable for development and therefore not appropriate to allocate for proposed use in a neighbourhood plan.
- 3.19 While the assessment indicates whether a site is appropriate for allocation or not, it is important to note that there is also no obligation for HPC to allocate any of the sites, based on the results of this assessment.

## **Task 6: Indicative Housing Capacity**

- 3.20 The capacity of a site is the amount of development that would be appropriate for that site, depending on location, the surrounding area and the site context, e.g. existing buildings or trees. Where a figure has not already been put forward for the site, e.g. through planning application or in the call for sites, or through another document such as the SHELAA, a figure has been provided to indicate the amount of development that could be possible on the site.
- 3.21 For sites being considered for housing where a capacity figure does not already exist, a simple calculation has been made to exclude a part of the site for non-residential use (e.g. open space) and then apply an appropriate density expressed in number of dwellings per hectare. For the sites assessed, a density of 25-30 dwellings per ha was used, based on the average density of sites within the SHELAA, to make the assessment as consistent as possible. The amount of space excluded for non-residential uses has been 10% for sites up to 0.4 hectares, 20% for sites up to 2 hectares and 25% for larger sites.
- 3.22 The indicative densities and capacities stated for each site in this high-level assessment should however be considered as a starting point only. Different densities than suggested in this report may be appropriate to apply to the sites in the NPA (resulting in different capacities) based on site specific circumstances. It is recommended that the number of homes allocated per site is consistent with the existing density of the village's built up area and appropriate for the context and setting of the site, considering site-specific characteristics and constraints. Therefore, the densities designated as appropriate by HPC in the HNP may differ from the densities as set out in this report.
- 3.23 Site sizes have been taken from the landowner information or estimated from satellite mapping (Google Earth).

# 4. Site Assessment

## 4.1 Identified sites

The eight sites included in the assessment have been identified through the BMSDC Call for Sites (2014 and 2016) and the Neighbourhood Plan's Call for Sites (2019). One site (Site 7)

- was submitted through BMSDC Call for Sites and seven sites (Site 1, Site 2 part 1, Site 2 part 2, Site 3, Site 4, Site 5, Site 6) were submitted through the Neighbourhood Plan's Call for Sites.
- 4.2 Three of these sites have been previously assessed in the 2017 BMSDC SHELAA. One of these sites was included in a revised form in the 2019 BMSDC replacement SHELAA. For the purposes of this report the former larger extent of the site is included and the section of the site which was included in the 2019 SHELAA (which now has planning permission) was excluded from the site boundary. The larger extent of the site was submitted in the Neighbourhood Plan Call for Sites even though it was considered unsuitable in the SHELAA. This approach is taken to ensure all known sites are considered.
- 4.3 The list of the HPC's sites was checked against the 'submitted sites' and SHELAA evidence base to ensure that all known sites were included, as well as any sites which were subject to current planning applications or had been granted planning permission. The assessment therefore includes a total of eight sites.
- 4.4 **Table 4-1** sets out the sites included in the assessment and **Figure 4-1** maps the sites included in the assessment.

#### Table 4-1: Sites included in the assessment

Sites	Taken forward for assessment
LA68 – Land east of Ipswich Road	No – Already allocated in BMSJLP
1 - Land east of Ipswich Road, Holbrook	Yes
2 Part 1 - Land to the north of Admirals Quarter	Yes
2 Part 2 - Land to the east of Admirals Quarter	Yes
3- Royal Hospital School	Yes
4- Land at Hyams Lane, Holbrook	Yes
5- Land west of The Street	Yes
6- Land west of B1080 and north of Woodlands Road	Yes
7 - Land south of Woodlands Road	Yes

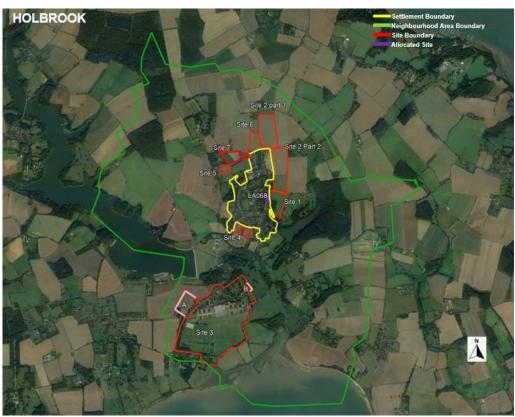


Figure 4-1 Sites included in the assessment

# 5. Site Assessment Summary

- 5.1 All eight sites were assessed to consider whether they would be suitable for allocation in the HNP for housing or other uses. Given there is no housing requirement, an evidence of need for this type of development would need to be demonstrated for the neighbourhood plan to propose housing allocations.
- **Table 5-1** sets out a summary of the site assessments, which should be read alongside the full assessments available in the proformas in Appendix A.
- 5.3 The last column on the table gives a 'traffic light' rating for each site, indicating whether each site is suitable and available for development and therefore could be considered as a potential site for allocation. Red indicates the site is not suitable, green indicates it is suitable. Amber indicates that there are issues that would need to be resolved or mitigated before it was allocated. All sites in this assessment were submitted through either the Council or Neighbourhood Call for Sites so are considered to be available for development.
- 5.4 A plan showing all of the sites assessed and the red /amber / green rating for each is shown in **Figure 5-1**.

Table 5-1: Site Assessment Summary Table

Site Reference	Site Size (Hectares)	Capacity (Indicative number of homes)	SHELAA	AECOM Conclusions	Overall RAG rating
1	5.65	30	SHELAA 2017 Conclusion: 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. 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. (NB. part of this site is now allocated and has planning permission. The remaining part of the site is considered as part of this site assessment)	This assessment considers the remaining site area not already allocated for development.  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.  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 is evidence of an additional housing need. However, it could be considered as a reserve site in case of further development needs or as a rural exception site if there was evidence of a need for this type of housing.	
2 Part 1	10.7	125-150	N/A	This greenfield site is adjacent to both the built-up area and the settlement boundary. It is located at the other end of the village to most of the services and facilities (approximately 20 minute walk), reducing the likelihood of walking as the primary mode of transport.  The site is not compliant with Core Strategy Policy CS11 as even though it is adjacent to the built-up area, is not well related to services and	

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				facilities. It is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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 policy is not yet adopted it must be given material consideration.  In addition, development at this site would constitute ribbon development as it would extend the settlement north of the current defined edge and
				would not relate well to the existing settlement, therefore the site is not suitable for housing allocation.
2 Part 2	11	137-165	N/A	This greenfield site is adjacent to both the built-up area and the settlement boundary. The length of the site spans almost half the length of the village meaning the site is in close proximity to the centre of the village and a number of services and facilities, it is approximately a 15-minute walk to a shop, primary school, secondary school, bus stop and open space.
				The site is compliant with Core Strategy Policy CS11 as it is adjacent to the built-up area, fairly well related to services and facilities and if a lower density is used would be an appropriate scale and not constitute ribbon development. However, the site is not compliant with emerging Joint Local Plan Policy SP03 as it is 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 and that new allocations are included within the defined settlement boundaries. While this draft policy is not yet adopted it must be given material consideration.
				This site would not be suitable for development unless there is evidence of an additional housing need. However it could be considered as a reserve site in case of further development needs or as a rural exception site if there was evidence of a need for this type of housing.
3	81	See RHS proposals in Appendix A	N/A	This site has been submitted to the Neighbourhood Plan Call for Sites by the Royal Hospital School to include proposals for modernisation and expansion of its educational facilities. The school is currently the biggest employer in the village, and provides facilities for use by the community.

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The site is located well outside the built-up area and the settlement boundary.

The proposals for the expansion of the school facilities marked as A and B in Appendix A are potential expansion to academic/ sports campus. Two areas are proposed for expansion, one to the north west of the existing site (area A) and one to the east (area B).

The two expansion areas do not appear to conflict with Core Strategy policy CS3 as it would contribute to the local economy and given the current use of the site for education is appropriate to the scale, character and nature of the locality. The expansion areas are also compliant with BMSJLP Policy LP32 as it is an extension to the existing facility in C2 Use Class. Both expansion areas are located within the AONB. The local policy on AONB does not outright restrict any development however. great weight should be given to conserving and enhancing the AONB. Therefore, with good design and environmental consideration the expansions could be compliant with BMSJLP Policy LP19. While the BMSJLP is not yet adopted it must be given material consideration. In addition, it is compliant with Babergh Local Plan (saved policies) Policy CR02 as there is no alternative location for this development given that the entre school is within the AONB.

The site as an allocation in the Neighbourhood Plan should be discussed with BMSDC and the Suffolk County Council as the Local Authority for education and should have regard to the Districtwide Education Policy.

As the wider site as submitted has a high number of constraints (extensive heritage assets, TPOs and AONB designation and it is on the boundary of the Stour Estuary SSSI) , the entire site would not be appropriate for development; only the two expansion areas specifically proposed for new buildings were assessed for their suitability for development. However, the wider site could be proposed as a site allocation to allow for additional facilities to be provided as required by the school, and set out in the RHS proposal. Provision of additional facilities as part of a neighbourhood plan allocation should be discussed with the Local Planning Authority.

4	2.65	55-60	SHELAA 2017 Conclusions: Site is potentially suitable, but the following considerations would require further investigation: Highways – regarding access, footpaths and infrastructure required 'Cordon sanitaire' - consultation required with Anglian Water. The site is potentially considered suitable for residential development, taking identified constraints into consideration.  Discounted in SHELAA 2019: Site lies within Cordon Sanitaire and lies within an area of high heritage sensitivity.	This greenfield site is surrounded by the built-up area and settlement boundary on three sides. Development of this site would not constitute 'ribbon' development and would constitute only a small extension from the existing settlement boundary. It is located in relatively close proximity to the centre of the village and a number of services and facilities.  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. However, the site is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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 is not yet adopted it must be given material consideration. It is possible that the site could be allocated for development as it is compliant with policy in the Core Strategy, however consultation with the Council would be required to determine its suitability in light of the emerging policy.  If this site is considered as a reserve allocation in the HNP the northern part adjacent to the settlement would be most suitable as this is closest to the village centre and access is possible. The SHELAA states that the site is within an area of 'Cordon Sanitaire' which requires consultation with Anglian Water.  In conclusion, this site is not suitable for allocation in the Neighbourhood Plan as there is no housing requirement in the area however, could be considered as a reserve site or included in a rural exception policy subject to consultation with Anglian Water and the Local Planning Authority.	
5	1.45	36-43	N/A	This greenfield site is located outside both the built-up area and settlement boundary.  The site is not compliant with Core Strategy Policy CS11 as it is not within or adjacent to the built-up area. In addition, the site is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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 and new allocations are included within the defined settlement	

#### Holbrook Neighbourhood Plan Site Options Assessment

				boundaries. While this draft policy is not yet adopted it must be given material consideration. The site is also not appropriate for an allocation as a Rural Exception Site, under Core Strategy Policy CS20, as it is not located adjacent to or well related to the settlement boundary.  In conclusion, this site is unsuitable for allocation as it does not comply with CS11 or CS20. The site is also subject to constraints relating to its impact upon the SSSI and provision of vehicular access.	
6	3.3	70	SHELAA 2017 Conclusion: 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 will need to be considered; compability - appropriate design would need to be considered with regards to providing a natural buffer between development and open countryside; Townscape - partial development may be more appropriate and supportable. The site is potentially considered suitable for residential development, taking identified constraints into consideration. However only part development (southern aspect of site) is recommended in order to avoid disproportionate development to the existing settlement. Estimated new net site area: 1.5ha	This greenfield site is adjacent to both the built-up area and the settlement boundary. It is located at the other end of the village to most of the services and facilities (approximately 20 minute walk), reducing the likelihood of walking as the primary mode of transport.  The site was not deemed to be compliant with Core Strategy Policy CS11 in a previous planning application (Planning Application ref. DC/17/06037) due to locational context as it would constitute ribbon development. In addition, the site is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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 is not yet adopted this draft policy must be given material consideration.	
			Discounted in SHELAA 2019: Site has poor connectivity to the existing settlement.	In addition, development at this site would consitutue ribbon development and would detract from the existing village form therefore the site is not suitbale for housing.	
7	4	75-90	Discounted from 2019 SHELAA: No possibility of creating suitable access to the site.	This greenfield site is adjacent to both the built-up area and the settlement boundary. Development of the entire site would extend into open countryside and would not relate well to the existing settlement. However, if only a small portion of the site between the settlement edge and the care home was considered, this would have less of an impact on the surround countryside and is approximately 10-15-minute walk to key services and facilities.  The site is not compliant with Core Strategy Policy CS11 as it is not within or adjacent to the built-up area (except for a very small potion which is adjacent) and there is no special justification for inclusion. In addition, the	

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	site is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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 is not yet adopted this draft policy must be given material consideration.
	In conclusion, this site is not suitable for allocation in the Neighbourhood Plan as there is no housing requirement in the area. The small part of the site between the settlement edge and the care home could be considered as a reserve site or included in a rural exception policy subject to consultation with the Local Planning Authority. Access would need to be confirmed as this was highlighted in a previous SHELAA as being a constraint to development.



Figure 5-1 Sites with RAG rating

# **Conclusions**

#### Site assessment conclusions

The site assessment has found that of the eight sites considered one site is immediately suitable and available for education uses and, if found to be viable for the proposed development, would be a recommended shortlist from which HPC could select sites to allocate for education uses in the Neighbourhood Plan. This site is free from constraints or have constraints that can be resolved. It is:

Site 3: This site has been submitted to the Neighbourhood Plan Call for Sites by the Royal Hospital School to include proposals for modernisation and expansion of its educational facilities. The school is currently the biggest employer in the village, and provides facilities for use by the community. The site is located well outside the built-up area and the settlement boundary. The proposals for the expansion of the school facilities marked Area A and B on Appendix A are potential expansion to academic/ sports campus. Two areas are proposed for expansion, one to the north west of the existing site (area A) and one to the east (area B). The two expansions are compliant with local policy and do not pose significant constraints, however should be consulted on with Suffolk County Council in light of the Districtwide Education Policy.

5.6 The remaining seven sites are not suitable for residential development and therefore not appropriate for allocation in the plan.

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.

Site 2 part 1: This greenfield site is adjacent to both the built-up are and the settlement boundary. It is located at the other end of the village to most of the services and facilities (approximately 20-minute walk), reducing the likelihood of walking as the primary mode of transport. The site does not conform to local policy and would constitute ribbon development.

Site 2 part 2: This greenfield site is adjacent to both the built-up area and the settlement boundary. The length of the site spans almost half the length of the village meaning the site is in close proximity to the centre of the village and a number of services and facilities, it is approximately a 15-minute walk to a shop, primary school, secondary school, bus stop and open space. The site is not compliant with local policy and there is no clear access.

Site 4: This greenfield site is surrounded by the built-up area and settlement boundary on three sides. Development of this site would not constitute ribbon' development and would constitute only a small extension from the existing settlement boundary. It is located in relatively close proximity to the centre of the village and a number of services and facilities. However, this site is not suitable for allocation as there is no housing requirement.

Site 5: This greenfield site is located outside both the built-up area and settlement boundary. This site is unsuitable for allocation as it does not comply with CS11 or CS20. The site is also subject to constraints relating to its impact upon nearby SSSI and provision of vehicular access.

Site 6: This greenfield site is adjacent to both the built-up are and the settlement boundary. It is located at the other end of the village to most of the services and facilities (approximately 20-minute walk), reducing the likelihood of walking as the primary mode of transport. The site is not in conformity with local policy and would constitute ribbon development.

Site 7: This greenfield site is adjacent to both the built-up area and the settlement boundary at only a small interface. Development of the entire site would extend into open countryside and would not

relate well to the existing settlement. However, development on this site would not constitute ribbon development and is approximately 10-15-minute walk to accessing key services and facilities. The 2019 SHELAA noted access as a primary issue. The site is not suitable for allocation as there is no housing requirement.

5.7 However, a small number of the identified sites (Site 1, Site 2 part 2, Site 4 and Site 7) could be considered as reserve or contingency allocations, if supported by the Local Planning Authorities and if the appropriate site size was agreed with landowners. This would allow them to take priority if the existing allocations or sites with planning permission are not implemented. These sites could also be considered for rural exception sites to meet the identified need for affordable housing.

### **Next Steps**

- 5.8 BMSDC have confirmed that they consider the housing target stated in the Joint Local Plan for Holbrook of 68 dwellings to have been met. While this figure is indicative only and may still change, subject to changes to the emerging Local Plan as it continues to evolve, the emerging Local Plan is at an advanced stage (Preferred Options are published) and therefore, this figure is unlikely to change significantly. In addition, the Holbrook HNA did not provide evidence of housing need quantity, but only of type, size and tenure of local need. Therefore, should HPC wish to allocate sites, they should provide reasons for why this is the case, and show that in line with Policy SP04 on Housing Spatial Distribution, exceeding local plan requirements is justified due to "the unique characteristics and planning context of the designated area", which would enable the Neighbourhood Plan to exceed such requirements. For example, the need for affordable housing to justify allocation of Rural Exception Sites.
- 5.9 Should HPC decide to allocate a site or sites, the next steps will be for the Parish Council to select the sites for allocation in the Neighbourhood Plan, based on:
  - The findings of this site assessment;
  - An assessment of viability;
  - Community consultation;
  - Discussions with Babergh and Mid Suffolk District Councils;
  - Local criteria that can be applied to differentiate between the suitable sites, in particular the extent to which the sites support the vision and objectives for the Neighbourhood Plan;
  - Any other evidence that becomes available, such as assessments of constraints such as local transport or infrastructure capacity; and
  - Other considerations such as the appropriate density of the proposed sites to reflect local character.

## **Viability**

5.10 As part of the site selection process, it is recommended that the Neighbourhood Group discusses site viability with Babergh and Mid Suffolk District Councils and with landowners and site developers. The Local Plan evidence bases may contain evidence of the viability of certain types of sites or locations which can be used to support the Neighbourhood Plan site allocations.

# **Appendix A - Proformas**

#### Site Details

Site Address / Location	Land East of Ipswich Road, Holbrook
LA068 Site 1	
Gross Site Area (Hectares)	5.64
SHLAA/SHELAA Reference (if applicable)	SS0717
SHLAA/SHELAA Conclusions (if applicable)	SHELAA 2017 Conclusion: 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; – appropriate design would need to be considered with regards existing development and open countryside; Townscape - partial development may be more appropriate and supportable. 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. (NB. this conclusion includes the whole site where as this assessment just looks at the part of the site that is not already allocated).
Existing land use	Agricultural
Land use being considered, if known (e.g. housing, community use, commercial, mixed use)	Housing
Development Capacity (Proposed by Landowner or SHLAA/HELAA)	30 dwellings
Site identification method / source (e.g. SHELAA, Call for Sites consultation, identified by neighbourhood planning group)	Neighbourhood Plan Call for Sites
Planning history (Live or previous planning applications/decisions)	None
Neighbouring uses	Agricultural and to the west of site is the existing settlement.

### Assessment of Suitability

#### **Environmental Constraints**

Indicator of Suitability	Assessment
Site is predominantly, or wholly, within or adjacent to the following statutory environmental designations:  Yes / No / partly or adjacent  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)  Does the site fall within a SSSI Impact Risk Zone and would the proposed use/development trigger the requirement to consult Natural England?	Yes - Partly adjacent to AONB, SSSI Impact Risk Zone (consultation required with Natural England for any residential development over 50 units within settlement boundary and over 10 outside existing settlements). Within Additional Project Area.
Site is predominantly, or wholly, within or adjacent to the following non statutory environmental designations:  Yes / No / partly or adjacent / Unknown  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	Yes - Drinking water safeguard zone (surface water)
Site is predominantly, or wholly, within Flood Zones 2 or 3?  See guidance notes: Flood Zone 1: Low Risk Flood Zone 2: Medium Risk Flood Zone 3 (less or more vulnerable site use): Medium Risk Flood Zone 3 (highly vulnerable site use): High Risk  Site is at risk of surface water flooding?	Low Risk
- Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk - >15% of the site is affected by medium or high risk of surface water flooding – Medium Risk	Majority of the site is very low risk, with small pockets of the site marked as low risk.
Is the land classified as the best and most versatile agricultural land (Grades 1, 2 or 3a)  Yes / No / Unknown	Yes

Indicator of Suitability	Assessment
Site contains habitats with the potential to support priority species?  Does the site contain local wildlife-rich habitats?  Is the site part of:  UK BAP Priority Habitat;  a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);  wildlife corridors (and stepping stones that connect them); and/or  an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?  Yes / No / Unknown	Yes- Part of the site contains Woodland
Site is predominantly, or wholly, within or adjacent to an Air Quality Management Area (AQMA)?  Yes / No / Unknown	No

#### **Physical Constraints**

Indicator of Suitability	Assessment
Is the site:	
Flat or relatively flat	Gently sloping (north west to south east)
Gently sloping or uneven	
Steeply sloping  Is there existing vehicle access to the site, or potential to	
create suitable access?	
or cate suitable access.	Yes
Yes/No/Unknown	
Is there existing pedestrian/cycle access to the site, or	
potential to create suitable access?	
Pedestrian?	
Yes / No / Unknown	
1637 NO / CHRIGWII	Yes
Cycle?	
Yes/No/Unknown	Yes
A D D (14/ (DD 140 )	
Are there any Public Rights of Way (PRoW) crossing the	Yes
site? Yes / No / Unknown	163
Are there any known Tree Preservation Orders on the	
site?	No
Yes / No / Unknown	
Are there veteran/ancient or other significant trees within	
or adjacent to the site? Are they owned by third parties?	
Significant trees?	
Yes, within / Yes, adjacent / No / Unknown	Yes within - area of woodland
Potentially veteran or ancient trees present?	Unknown
Yes, within / Yes, adjacent / No / Unknown	
Owned by third parties?	Unknown
Yes / No / Unknown	
Is the site likely to be affected by ground contamination? Yes / No / Unknown	Unknown
Too. 10. Olimonii	
Is there any utilities infrastructure crossing the site i.e.	
power lines/pipe lines, or is the site in close proximity to	No
hazardous installations?	
Yes / No / Unknown	
Would development of the site result in a loss of social,	No
amenity or community value? Yes / No / Unknown	INO
1 CO / INU / OHRHOWII	

#### Accessibility

Factor		Guidance	
each facility. Additional facilities can be	e added to the list. The	easured using walking routes from the centre of each site to e distances are based on the assumption that 400m is equal ng Google Maps: https://www.google.com/maps	
What is the distance to the following facilities (measured from the edge of the site)	Distance (metres)	Comments	
Town / local centre / shop	400-1	00m 410 1200m 200m	
Bus /Tram Stop	400-	00m 326 800m 00m	
Train station	400-1	9012 (lpswich) 1200m 200m	

Factor	Guidance	
Primary School	<400m 400-1200m >1200m	647
Secondary School	<1600m 1600-3900m >3900m	539
Open Space / recreation facilities	<400m 400-800m >800m	Adjacent to open space, 539m away from Holbrook Sports Centre
Cycle Route	<400m 400-800m >800m	Unknown

# Landscape and Visual Constraints

This section should be answered based on existing evidence (see guidance notes) or by a qualified landscape consultant.

Indicator of Suitability	Assessment
Is the site low, medium or high sensitivity in terms of landscape?  Low sensitivity: the site has few or no valued features, and/or valued features that are less susceptible to development and can accommodate change.  Medium sensitivity: the site has many valued features, and/or valued features that are susceptible to development but could potentially accommodate some change with appropriate mitigation.  High sensitivity: the site has highly valued features, and/or valued features that are highly susceptible to development. The site can accommodate minimal change.	High
Is the site low, medium or high sensitivity in terms of visual amenity?  Low sensitivity: the site is visually enclosed and has low intervisibility with the surrounding landscape, and/or it would not adversely impact any identified views.  Medium sensitivity: the site is somewhat enclosed and has some intervisibility with the surrounding landscape, and/or it may adversely impact any identified views.  High sensitivity: the site is visually open and has high intervisibility with the surrounding landscape, and/or it would adversely impact any recognised views.	Low

Heritage Constraints

Indicator of Suitability	Assessment
Would the development of the site cause harm to a designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	Limited impact
Would the development of the site cause harm to a non-designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	Limited/ no impact

#### Planning policy constraints

Indicator of Suitability	Assessment
Is the site in the Green Belt? Yes / No / Unknown	No
Is the site allocated for a particular use (e.g. housing / employment) or designated as open space in the adopted and / or emerging Local Plan? Yes / No / Unknown	No
Are there any other relevant planning policies relating to the site?	JLP SP03 and Core Strategy Policy CS11 and CS20 Rural Exception Sites.
Is the site:	
Greenfield  A mix of greenfield and previously developed land Previously developed land?	Greenfield
Is the site within, adjacent to or outside the existing built up area?  Within the existing built up area (infill)?  Adjacent to and connected to the existing built up area?  Outside and not connected to the existing built up area?	Adjacent
Is the site within, adjacent to or outside the existing settlement boundary (if one exists)?	
Within the existing settlement boundary? Adjacent to and connected to the existing settlement boundary? Outside and not connected to the existing settlement boundary?	Adjacent
Would development of the site result in neighbouring settlements merging into one another? Yes / No / Unknown	No

Indicator of Suitability	Assessment
Is the size of the site large enough to significantly change the size and character of the existing settlement?  Yes / No / Unknown	No

# Assessment of Availability

Indicator of Availability	Assessment
Is the site available for development? Yes / No / Unknown.	Yes - Submitted in the 2017 SHLAA and the NP Call for Sites.
Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?  Yes / No / Unknown.	Unknown
Is there a known time frame for availability?  Available now / 0-5 years / 6-10 years / 11-15 years.	Submission has proposed 0-5 years deliverability.

# Viability

Indicators of Viability	Assessment
Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities?  Yes / No / Unknown.	Unknown
What evidence is available to support this judgement?	

#### Conclusions

Conclusions	Assessment
What is the expected development capacity of the site (either as proposed by site promoter or estimated through SHLAA/HELAA or Neighbourhood Plan Site Assessment)?	N/A
What is the likely timeframe for development? (0-5/6-10/11-15/15+ years)	Submission has proposed 0-5 years deliverability.
Other key information	N/A
Overall rating (Red/Amber/Green)	
The site is suitable and available The site is potentially suitable, and available. The site is not currently suitable, and available.	Red
Are there any known viability issues? Yes / No	No

Conclusions	Assessment
	This assessment considers the remaining site area not already allocated for development.
	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.
Summary of justification for rating	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.

# 1. Neighbourhood Planning Site Assessment

# Site Details

Topic	Details
Site Reference / Name	2 Part 1
Site 2 part 1	
Site Address / Location	Land to the North of Admirals Quater
Gross Site Area (Hectares)	10.7 ha (estimate from Google Earth)
SHLAA/SHELAA Reference (if applicable)	N/A
SHLAA/SHELAA Conclusions (if applicable)	N/A
Existing land use	Agricultural
Land use being considered, if known (e.g. housing, community use, commercial, mixed use)	Housing
Development Capacity (Proposed by Landowner or SHLAA/HELAA)	225- 270
Site identification method / source (e.g. SHELAA, Call for Sites consultation, identified by neighbourhood planning group)	Neighbourhood Plan Call for Sites
Planning history (Live or previous planning applications/decisions)	None
Neighbouring uses	Agricultural on three sides and residential on one side.

# Assessment of Suitability

#### **Environmental Constraints**

Indicator of Suitability	Assessment
Site is predominantly, or wholly, within or adjacent to the following statutory environmental designations:  Yes / No / partly or adjacent  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)  Does the site fall within a SSSI Impact Risk Zone and would the proposed use/development trigger the requirement to consult Natural England?	Yes- Partly adjacent to AONB, SSSI Impact Risk Zone (consultation required with Natural England for any residential development over 50 units within settlement boundary and over 10 outside existing settlements). Within Additional Project Area.
Site is predominantly, or wholly, within or adjacent to the following non statutory environmental designations:  Yes / No / partly or adjacent / Unknown  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	Yes- Drinking water safeguard zone (surface water)
Site is predominantly, or wholly, within Flood Zones 2 or 3?  See guidance notes: Flood Zone 1: Low Risk Flood Zone 2: Medium Risk Flood Zone 3 (less or more vulnerable site use): Medium Risk Flood Zone 3 (highly vulnerable site use): High Risk  Site is at risk of surface water flooding?  See guidance notes:  - Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk  - >15% of the site is affected by medium or high risk of surface water flooding – Medium Risk	Low risk  Very Low
Is the land classified as the best and most versatile agricultural land (Grades 1, 2 or 3a)  Yes / No / Unknown	Yes

Indicator of Suitability	Assessment
Site contains habitats with the potential to support priority species?	
Does the site contain local wildlife-rich habitats?	
Is the site part of:	
<ul> <li>UK BAP Priority Habitat;</li> <li>a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);</li> <li>wildlife corridors (and stepping stones that connect them); and/or</li> <li>an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?</li> </ul> Yes / No / Unknown	No
Site is <b>predominantly, or wholly, within or adjacent to</b> an Air Quality Management Area (AQMA)?	
Yes / No / Unknown	No

#### **Physical Constraints**

Indicator of Suitability	Assessment
Indicator of Suitability	Abbebbilletit
Is the site:	
Flat or relatively flat	Flat
Gently sloping or uneven	
Steeply sloping	
Is there existing vehicle access to the site, or potential to	
create suitable access?	Yes- access could be created.
	Tes access could be created.
Yes / No / Unknown	
Is there existing pedestrian/cycle access to the site, or	
potential to create suitable access?	
Pedestrian?	
Yes / No / Unknown	
1657 NO 7 OTIKITOWIT	Yes
Cycle?	
Yes / No / Unknown	Yes
Are there any Public Rights of Way (PRoW) crossing the	
site?	No - Adjacent
Yes / No / Unknown	
Are there any known Tree Preservation Orders on the	AL.
site?	No
Yes / No / Unknown	
Are there veteran/ancient or other significant trees within	
or adjacent to the site? Are they owned by third parties?	
Significant trees?	
Yes, within / Yes, adjacent / No / Unknown	
- Cop main in Cop adjaconic (No.) Chillian	No
Potentially veteran or ancient trees present?	
Yes, within / Yes, adjacent / No / Unknown	No
Owned by third parties?	
Yes / No / Unknown	Unknown
Is the site likely to be affected by ground contamination?	
Yes / No / Unknown	Unknown
Is there any utilities infrastructure crossing the site i.e.	
power lines/pipe lines, or is the site in close proximity to	Yes- power lines
hazardous installations?	100 power lines
Yes / No / Unknown	
Would development of the site result in a loss of social,	
amenity or community value?	No
Yes / No / Unknown	

#### Accessibility

Factor		Guidance	
Distances to community facilities and services should be measured using walking routes from the centre of each site to each facility. Additional facilities can be added to the list. The distances are based on the assumption that 400m is equal to approximately 5 minutes' walk. This can be measured using Google Maps: <a href="https://www.google.com/maps">https://www.google.com/maps</a>			
What is the distance to the following facilities (measured from the edge of the site)	Distance (metres)		Comments
Town / local centre / shop	400-1	00m  200m   <b>00m</b>	1340
Bus /Tram Stop	400-8	00m 800m 00m	120

Factor	Guidano	ce
Train station	<400m 400-1200m >1200m	8690 - Ipswich
Primary School	<400m 400-1200m >1200m	1480
Secondary School	<1600m 1600-3900m >3900m	550
Open Space / recreation facilities	<400m 400-800m >800m	Adjacent to open space
Cycle Route	<400m 400-800m >800m	Unknown

# Landscape and Visual Constraints

This section should be answered based on existing evidence (see guidance notes) or by a qualified landscape consultant.

Indicator of Suitability	Assessment
Is the site low, medium or high sensitivity in terms of landscape?  Low sensitivity: the site has few or no valued features, and/or valued features that are less susceptible to development and can accommodate change.  Medium sensitivity: the site has many valued features, and/or valued features that are susceptible to development but could potentially accommodate some change with appropriate mitigation.  High sensitivity: the site has highly valued features, and/or valued features that are highly susceptible to development. The site can accommodate minimal change.	High
Is the site low, medium or high sensitivity in terms of visual amenity?  Low sensitivity: the site is visually enclosed and has low intervisibility with the surrounding landscape, and/or it would not adversely impact any identified views.  Medium sensitivity: the site is somewhat enclosed and has some intervisibility with the surrounding landscape, and/or it may adversely impact any identified views.  High sensitivity: the site is visually open and has high intervisibility with the surrounding landscape, and/or it would adversely impact any recognised views.	Medium

Heritage Constraints

Indicator of Suitability	Assessment
Would the development of the site cause harm to a designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	Limited impact- there is a Neolithic Enclosure adjacent.
Would the development of the site cause harm to a non-designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	No impact

#### Planning policy constraints

Indicator of Suitability	Assessment
Is the site in the Green Belt? Yes / No / Unknown	No
Is the site allocated for a particular use (e.g. housing / employment) or designated as open space in the adopted and / or emerging Local Plan? Yes / No / Unknown	No
Are there any other relevant planning policies relating to the site?	JLP SP03 and Core Strategy Policy CS11 and CS20 Rural Exception Sites.
Is the site:	
Greenfield  A mix of greenfield and previously developed land Previously developed land?	Greenfield
Is the site within, adjacent to or outside the existing built up area?  Within the existing built up area (infill)?  Adjacent to and connected to the existing built up area?  Outside and not connected to the existing built up area?	Adjacent
Is the site within, adjacent to or outside the existing settlement boundary (if one exists)?	
Within the existing settlement boundary? Adjacent to and connected to the existing settlement boundary? Outside and not connected to the existing settlement boundary?	Adjacent
Would development of the site result in neighbouring settlements merging into one another?  Yes / No / Unknown	No

Indicator of Suitability	Assessment
Is the size of the site large enough to significantly change the size and character of the existing settlement? Yes / No / Unknown	Yes

### Assessment of Availability

Assessment
Yes- however the site submitted after deadline for Call for Sites - Parish Council unsure if the landowner is serious.
Unknown
Unknown

#### Viability

Indicators of Viability	Assessment
Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities?  Yes / No / Unknown.	Yes- Relocation of power lines may affect viability.
What evidence is available to support this judgement?	

#### Conclusions

Conclusions	Assessment
What is the expected development capacity of the site (either as proposed by site promoter or estimated through SHLAA/HELAA or Neighbourhood Plan Site Assessment)?	N/A
What is the likely timeframe for development (0-5/6-10/11-15/15+ years)	Unknown
Other key information	
Overall rating (Red/Amber/Green)	
The site is suitable and available The site is potentially suitable, and available. The site is not currently suitable, and available.	Red
Are there any known viability issues? Yes/No	Yes- power lines

This greenfield site is adjacent to both the built-up area and the settlement boundary. It is located at the other end of the village to most of the services and facilities (approximately 20 minute walk), reducing the likelihood of walking as the primary mode of transport.

It would be possible to provide vehicular access, however there are a number of constraints to this. The obvious access would be on the south western corner of the site; however, this is currently a PRoW and a private road. The client have advised that the land owner would not allow access at this location. Access would then have to be provided further north on the Ipswich Road, with the removal of hedgerows, where the current speed limit is 60 mph, the road is relatively narrow, has a number of bends and already considered to be a dangerous junction. Consultation with Highways is necessary to assess the potential to create access.

Grade II Listed Building, Potash Farmhouse, is located north west of the site, however given the natural buffer of trees and Ipswich Road it not considered to be a major constraint. The site is in close proximity to the AONB, is within the Additional Project Area and the Stour Estuary Impact Risk Zone therefore development of this site would require consultation with Natural England. There are potential views onto the Freston and Culter's Woods With Holbrook Park SSSI to the north. 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. The site is not very well screened with limited hedgerows on two sides allowing some longer ranging views to the existing AONB and the proposed AONB extension. It is likely that the site would be considered to have high landscape sensitivity and medium visual sensitivity, however the specialist landscape assessment is outstanding.

There is utility infrastructure (power lines) crossing the site and the site falls outside the existing sewerage network which could affect the viability of the site. The cumulative impact of the whole of this site being developed and site 2 part 2 and site 6 needs to be considered as this would put huge strain on the already pressured road network.

The site is not compliant with Core Strategy Policy CS11 as even though it is adjacent to the built-up area, is not well related to services and facilities. It is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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 policy is not yet adopted it must be given material consideration.

In addition, development at this site would consitutue ribbon development as it would extend the settlment north of the current defined edge and would not relate well to the existing settlment.

Summary of justification for rating

Conclusions	Assessment

# 2. Neighbourhood Planning Site Assessment

## Site Details

Site Details	
Topic	Details
Site Reference / Name	2 Part 2
Site 2 Part 2	
Site Address / Location	Land to the East of Admirals Quater
Gross Site Area (Hectares)	11 ha (estimate from Google Earth)
SHLAA/SHELAA Reference (if applicable)	N/A
SHLAA/SHELAA Conclusions (if applicable)	N/A
Existing land use	Agricultural
Land use being considered, if known (e.g. housing, community use, commercial, mixed use)	Housing
Development Capacity (Proposed by Landowner or SHLAA/HELAA)	247-297
Site identification method / source (e.g. SHELAA, Call for Sites consultation, identified by neighbourhood planning group)	Neighbourhood Plan Call for Sites
Planning history	None
(Live or previous planning applications/decisions)  Neighbouring uses	New housing development to the west, otherwise agricultural

# Assessment of Suitability

#### **Environmental Constraints**

Indicator of Suitability	Assessment
Site is predominantly, or wholly, within or adjacent to the following statutory environmental designations:  Yes / No / partly or adjacent  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)  Does the site fall within a SSSI Impact Risk Zone and would the proposed use/development trigger the requirement to consult Natural England?	Yes - Partly adjacent to AONB, SSSI Impact Risk Zone (consultation required with Natural England for any residential development over 50 units within settlement boundary and over 10 outside existing settlements). Within Additional Project Area.
Site is predominantly, or wholly, within or adjacent to the following non statutory environmental designations:  Yes / No / partly or adjacent / Unknown  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	Yes; Other: Drinking water safeguard zone (surface water)
Site is predominantly, or wholly, within Flood Zones 2 or 3?  See guidance notes: Flood Zone 1: Low Risk Flood Zone 2: Medium Risk Flood Zone 3 (less or more vulnerable site use): Medium Risk Flood Zone 3 (highly vulnerable site use): High Risk	Low Risk
Site is at risk of surface water flooding?  See guidance notes:  Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk  >15% of the site is affected by medium or high risk of surface water flooding – Medium Risk	Very Low
Is the land classified as the best and most versatile agricultural land (Grades 1, 2 or 3a)  Yes / No / Unknown	Yes

Indicator of Suitability	Assessment
Site contains habitats with the potential to support priority species?	
Does the site contain local wildlife-rich habitats?	
Is the site part of:	
<ul> <li>UK BAP Priority Habitat;</li> <li>a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);</li> <li>wildlife corridors (and stepping stones that connect them); and/or</li> <li>an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?</li> </ul> Yes / No / Unknown	No
Site is <b>predominantly, or wholly, within or adjacent to</b> an Air Quality Management Area (AQMA)?	No
Yes / No / Unknown	

#### **Physical Constraints**

Physical Constraints	Accessment
Indicator of Suitability	Assessment
Is the site:	
Flat or relatively flat	Flat
Gently sloping or uneven	
Steeply sloping	
Is there existing vehicle access to the site, or potential to	
create suitable access?	
	No
Yes/No/Unknown	
Is there existing pedestrian/cycle access to the site, or	
potential to create suitable access?	
Pedestrian?	
Yes/No/Unknown	
	Yes
Cycle?	
Yes/No/Unknown	Yes
Are there any Public Rights of Way (PRoW) crossing the	
site?	Yes
Yes / No / Unknown	100
Are there any known Tree Preservation Orders on the	
site?	No
Yes / No / Unknown	
Are there veteran (ancient or other significant trace within	
Are there veteran/ancient or other significant trees within	
or adjacent to the site? Are they owned by third parties?	
Significant trees?	
Yes, within / Yes, adjacent / No / Unknown	
	No
Potentially veteran or ancient trees present?	
Yes, within / Yes, adjacent / No / Unknown	
	No
Owned by third parties?	
Yes / No / Unknown	
	Unknown
Is the site likely to be affected by ground contamination?	
Yes / No / Unknown	Unknown
Is there any utilities infrastructure crossing the site i.e.	
power lines/pipe lines, or is the site in close proximity to	No
hazardous installations?	INO
Yes / No / Unknown	
Would development of the site result in a loss of social,	
amenity or community value?	No
Yes / No / Unknown	

## Accessibility

Factor		Guidance	
Distances to community facilities and services should be measured using walking routes from the centre of each site to each facility. Additional facilities can be added to the list. The distances are based on the assumption that 400m is equal to approximately 5 minutes' walk. This can be measured using Google Maps: <a href="https://www.google.com/maps">https://www.google.com/maps</a>			
What is the distance to the following facilities (measured from the edge of the site)	Distance (metres)		Comments
Town / local centre / shop	400-	00m 1200m 200m	1220
Bus /Tram Stop	400-	00m - <mark>800m</mark> 00m	108

Factor	Guidance	
Train station	<400m 400-1200m >1200m	8690 - Ipswich
Primary School	<400m 400-1200m >1200m	1360
Secondary School	<1600m 1600-3900m >3900m	454
Open Space / recreation facilities	<400m 400-800m >800m	Adjacent to open space, 545m from Holbrook Sports Centre.
Cycle Route	<400m 400-800m >800m	Unknown

# Landscape and Visual Constraints

This section should be answered based on existing evidence (see guidance notes) or by a qualified landscape consultant.

Indicator of Suitability	Assessment
Is the site low, medium or high sensitivity in terms of landscape?  Low sensitivity: the site has few or no valued features, and/or valued features that are less susceptible to development and can accommodate change.  Medium sensitivity: the site has many valued features, and/or valued features that are susceptible to development but could potentially accommodate some change with appropriate mitigation.  High sensitivity: the site has highly valued features, and/or valued features that are highly susceptible to development. The site can accommodate minimal change.	High
Is the site low, medium or high sensitivity in terms of visual amenity?  Low sensitivity: the site is visually enclosed and has low intervisibility with the surrounding landscape, and/or it would not adversely impact any identified views.  Medium sensitivity: the site is somewhat enclosed and has some intervisibility with the surrounding landscape, and/or it may adversely impact any identified views.  High sensitivity: the site is visually open and has high intervisibility with the surrounding landscape, and/or it would adversely impact any recognised views.	Medium

Heritage Constraints

Indicator of Suitability	Assessment
Would the development of the site cause harm to a designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	No impact
Would the development of the site cause harm to a non-designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	No impact

#### Planning policy constraints

Indicator of Suitability	Assessment
Is the site in the Green Belt? Yes / No / Unknown	No
Is the site allocated for a particular use (e.g. housing / employment) or designated as open space in the adopted and / or emerging Local Plan? Yes / No / Unknown	No
Are there any other relevant planning policies relating to the site?	JLP SP03 and Core Strategy Policy CS11 and CS20 Rural Exception Sites.
Is the site:	
Greenfield A mix of greenfield and previously developed land	Greenfield
Previously developed land?  Is the site within, adjacent to or outside the existing	
built up area?  Within the existing built up area (infill)?  Adjacent to and connected to the existing built up area?  Outside and not connected to the existing built up area?	Adjacent
Is the site within, adjacent to or outside the existing settlement boundary (if one exists)?	
Within the existing settlement boundary? Adjacent to and connected to the existing settlement boundary? Outside and not connected to the existing settlement boundary?	Adjacent
Would development of the site result in neighbouring settlements merging into one another? Yes / No / Unknown	No

Indicator of Suitability	Assessment
Is the size of the site large enough to significantly change the size and character of the existing settlement? Yes / No / Unknown	Yes

### Assessment of Availability

Indicator of Availability	Assessment
Is the site available for development? Yes / No / Unknown.	Yes, however the site was submitted after deadline for Call for Sites - Parish Council unsure if the landowner is serious.
Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?  Yes / No / Unknown.	Unknown
Is there a known time frame for availability?  Available now / 0-5 years / 6-10 years / 11-15 years.	Unknown

# Viability

Indicators of Viability	Assessment
Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities?  Yes / No / Unknown.	Unknown
What evidence is available to support this judgement?	

#### Conclusions

Conclusions	Assessment
What is the expected development capacity of the site (either as proposed by site promoter or estimated through SHLAA/HELAA or Neighbourhood Plan Site Assessment)?	N/A
What is the likely timeframe for development (0-5/6-10/11-15/15+ years)	Unknown
Other key information	N/A
Overall rating (Red/Amber/Green)	
The site is suitable and available The site is potentially suitable, and available. The site is not currently suitable, and available.	Red
Are there any known viability issues? Yes / No	Unknown

Conclusions	Assessment
	This greenfield site is adjacent to both the built-up area and the settlement boundary. The length of the site spans almost half the length of the village meaning the site is in close proximity to the centre of the village and a number of services and facilities, it is approximately a 15-minute walk to a shop, primary school, secondary school, bus stop and open space.
	There are two PRoWs crossing the site. There is not currently any vehicular access to the site however it would be possible to create one through the recent development of Admirals Quarter. This new build site was designed and constructed to make that possible. However, this significant recent development together with the site would constitute an extension of the settlement and would cause cumulative highways concerns. These cumulative concerns are also in relation to site 2 part 1 and site 6.
	A Grade II Listed Building, 1 and 2 Hither House, is located to the south west of the site, however there are a number of dwellings between this heritage asset and the site reducing the potential harm.
Summary of justification for rating	The site is in close proximity to the AONB, is within the Additional Project Area and the Stour Estuary SSSI Impact Risk Zone therefore development of this site would require consultation with Natural England. 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. The site is relatively well screened on three sides however allows long ranging views to the north, on to the AONB. It is likely that the site would be considered to have high landscape and 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, fairly well related to services and facilities and would not constitute ribbon development.
	However, the site is not compliant with emerging Joint Local Plan Policy SP03 as it is 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. Therefore, this site is not suitable for housing because it does not meet local policy.
	The site is not suitable for allocation in the Neighbourhood Plan as there is no housing requirement however, could be partially considered as a reserve site or included in a rural exception policy.

# 3. Neighbourhood Planning Site Assessment

# Site Details

Topic	Details
Site Reference / Name	3
	B B

Topic	Details
Site Address / Location	Royal Hospital School
Gross Site Area (Hectares)	81 ha
SHLAA/SHELAA Reference (if applicable)	N/A
SHLAA/SHELAA Conclusions (if applicable)	N/A
Existing land use	School
Land use being considered, if known (e.g. housing, community use, commercial, mixed use)	Site specific policy and proposals map for the school and identification of two sites for future school campus expansion.
Development Capacity (Proposed by Landowner or SHLAA/HELAA)	N/A
Site identification method / source (e.g. SHELAA, Call for Sites consultation, identified by neighbourhood planning group)	Neighbourhood Plan Call for Sites
Planning history (Live or previous planning applications/decisions)	Extensive - mostly extensions, Listed Building applications, improvements/ alterations
Neighbouring uses	Agricultural

# Assessment of Suitability

# **Environmental Constraints**

Indicator of Suitability	Assessment
Site is predominantly, or wholly, within or adjacent to the following statutory environmental designations:  Yes / No / partly or adjacent  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)  Does the site fall within a SSSI Impact Risk Zone and would the proposed use/development trigger the requirement to consult Natural England?	Yes - On the Boundary of SSSI, Falls within an SSSI Impact Risk Zone Within the AONB
Site is predominantly, or wholly, within or adjacent to the following non statutory environmental designations:  Yes / No / partly or adjacent / Unknown  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	Yes- Drinking water safeguard zone (surface water)
Site is predominantly, or wholly, within Flood Zones 2 or 3?  See guidance notes: Flood Zone 1: Low Risk Flood Zone 2: Medium Risk Flood Zone 3 (less or more vulnerable site use): Medium Risk Flood Zone 3 (highly vulnerable site use): High Risk  Site is at risk of surface water flooding?  See guidance notes:	Low risk
<ul> <li>Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk</li> <li>&gt;15% of the site is affected by medium or high risk of surface water flooding – Medium Risk</li> <li>Is the land classified as the best and most versatile agricultural land (Grades 1, 2 or 3a)</li> <li>Yes / No / Unknown</li> </ul>	Low or Very Low  No

Indicator of Suitability	Assessment
Site contains habitats with the potential to support priority species?  Does the site contain local wildlife-rich habitats?  Is the site part of:  UK BAP Priority Habitat;  a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);  wildlife corridors (and stepping stones that connect them); and/or  an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?  Yes / No / Unknown	Yes -part of the site falls within and is adjacent to Deciduous Woodland.
Site is predominantly, or wholly, within or adjacent to an Air Quality Management Area (AQMA)?  Yes / No / Unknown	No

#### **Physical Constraints**

Physical Constraints	
Indicator of Suitability	Assessment
Is the site:	
Flat or relatively flat	Gently sloping.
Flat or relatively flat  Gently sloping or uneven	Gently sloping.
Steeply sloping	
Is there existing vehicle access to the site, or potential to	
create suitable access?	
or cate suitable access:	Yes
Yes / No / Unknown	
Is there existing pedestrian/cycle access to the site, or	
potential to create suitable access?	
Pedestrian?	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
Yes/No/Unknown	Yes
Cycle?	
Cycle? Yes / No / Unknown	
res/ No / Offictiowiti	Yes
Are there any Public Rights of Way (PRoW) crossing the	
site?	No
Yes / No / Unknown	
Are there any known Tree Preservation Orders on the	Yes -Area to the west of the site with several trees with
site?	TPO's
Yes / No / Unknown	TFOS
And the second consideration of the second consideration o	
Are there veteran/ancient or other significant trees within	
or adjacent to the site? Are they owned by third parties?	
Significant trees?	
Yes, within / Yes, adjacent / No / Unknown	Yes, within
Potentially veteran or ancient trees present?	
Yes, within / Yes, adjacent / No / Unknown	Unknown
	Olikilowii
Owned by third parties?	
Yes / No / Unknown	
	Unknown
Is the site likely to be affected by ground contamination?	Halmann
Yes / No / Unknown	Unknown
Is there any utilities infrastructure crossing the site i.e.	
power lines/pipe lines, or is the site in close proximity to	
hazardous installations?	No
Yes / No / Unknown	
Would development of the site result in a loss of social,	
amenity or community value?	No
Yes / No / Unknown	

## Accessibility

Factor	Guidance	
•	pe added to the list. The distances ar	walking routes from the centre of each site to re based on the assumption that 400m is equal DS: https://www.google.com/maps
What is the distance to the following facilities (measured from the edge of the site)	Distance (metres)	Comments
Town / local centre / shop	<400m 400-1200m >1200m	1450
Bus /Tram Stop	<400m 400-800m >800m	0

Factor	Guidance	
Train station	<400m 400-1200m >1200m	8368 - Manningtree
Primary School	<400m 400-1200m >1200m	1670
Secondary School	<1600m 1600-3900m >3900m	0
Open Space / recreation facilities	<400m 400-800m >800m	Adjacent to open space
Cycle Route	<400m 400-800m >800m	Unknown

# Landscape and Visual Constraints

This section should be answered based on existing evidence (see guidance notes) or by a qualified landscape consultant.

Indicator of Suitability	Assessment
Is the site low, medium or high sensitivity in terms of landscape?  Low sensitivity: the site has few or no valued features, and/or valued features that are less susceptible to development and can accommodate change.  Medium sensitivity: the site has many valued features, and/or valued features that are susceptible to development but could potentially accommodate some change with appropriate mitigation.  High sensitivity: the site has highly valued features, and/or valued features that are highly susceptible to development. The site can accommodate minimal change.	High
Is the site low, medium or high sensitivity in terms of visual amenity?  Low sensitivity: the site is visually enclosed and has low intervisibility with the surrounding landscape, and/or it would not adversely impact any identified views.  Medium sensitivity: the site is somewhat enclosed and has some intervisibility with the surrounding landscape, and/or it may adversely impact any identified views.  High sensitivity: the site is visually open and has high intervisibility with the surrounding landscape, and/or it would adversely impact any recognised views.	High

Heritage Constraints

Indicator of Suitability	Assessment
Would the development of the site cause harm to a designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	Direct impact - High potential to harm heritage assets but mitigation should be possible as other developments in the vicinity of the heritage assets have previously been permitted.
Would the development of the site cause harm to a non-designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	No impact

# Planning policy constraints

Indicator of Suitability	Assessment
Is the site in the Green Belt? Yes / No / Unknown	No
Is the site allocated for a particular use (e.g. housing / employment) or designated as open space in the adopted and / or emerging Local Plan? Yes / No / Unknown	No
Are there any other relevant planning policies relating to the site?	Core Strategy CS3: Strategy for Growth and Development
Is the site:  Greenfield  A mix of greenfield and previously developed land Previously developed land?	Mix
Is the site within, adjacent to or outside the existing built up area?  Within the existing built up area (infill)?  Adjacent to and connected to the existing built up area?  Outside and not connected to the existing built up area?	Outside
Is the site within, adjacent to or outside the existing settlement boundary (if one exists)?  Within the existing settlement boundary?  Adjacent to and connected to the existing settlement boundary?  Outside and not connected to the existing settlement boundary?	Outside
Would development of the site result in neighbouring settlements merging into one another? Yes / No / Unknown	No

Indicator of Suitability	Assessment
Is the size of the site large enough to significantly change the size and character of the existing settlement?  Yes / No / Unknown	No

# Assessment of Availability

Indicator of Availability	Assessment
Is the site available for development? Yes / No / Unknown.	Yes
Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?  Yes / No / Unknown.	Unknown
Is there a known time frame for availability?  Available now / 0-5 years / 6-10 years / 11-15 years.	Unknown

# Viability

Indicators of Viability	Assessment
Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities?  Yes / No / Unknown.	Unknown
What evidence is available to support this judgement?	

#### Conclusions

Conclusions	Assessment
What is the expected development capacity of the site (either as proposed by site promoter or estimated through SHLAA/HELAA or Neighbourhood Plan Site Assessment)?	Floorspace unknown
What is the likely timeframe for development (0-5/6-10/11-15/15+ years)	Unknown
Other key information	N/A
Overall rating (Red/Amber/Green)	
The site is suitable and available The site is potentially suitable, and available. The site is not currently suitable, and available.	Green
Are there any known viability issues? Yes / No	

This site has been submitted to the Neighbourhood Plan Call for Sites by the Royal Hospital School to include proposals for modernisation and expansion of its educational facilities. The school is currently the biggest employer in the village and provides facilities for use by the community. The site is located well outside the built-up area and the settlement boundary.

The proposals for the expansion of the school facilities marked as A and B are potential expansion to academic/ sports campus. Two areas are proposed for expansion, one to the north west of the existing site (area A) and one to the east (area B).

There is a large concentration of Listed Buildings on the site, making it very sensitive in heritage terms. The development that is proposed will have to implement mitigation measures to ensure there are not adverse impacts on these heritage assets.

The site is in very close proximity to the Stour Estuary SSSI and falls within the SSSI Impact Risk Zone. In addition, the site contains and area of Deciduous Woodland which is considered to a priority habitat, this area also has several TPO's.

Expansion Area A has vehicular access that would need some upgrading. The whole of the site is within the Suffolk Coast and Heaths AONB. 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. It is relatively flat and has long ranging views out the north over Alton Water dinghy park and to the south west over the River Stour. The boat house and staff houses are adjacent to the site; therefore, the expansion would fit in with the current landscape scene.

Expansion Area B towards has the potential to create access from existing road and car parking infrastructure within the school grounds. The site is well screened on most sides and offers some views out on to neighbouring fields and on to the school. It is likely to be considered to have high landscape sensitivity and high visual sensitivity, however the specialist landscape assessment is outstanding.

The two expansion areas do not appear to conflict with Core Strategy policy CS3 as it would contribute to the local economy and given the current use of the site for education is appropriate to the scale, character and nature of the locality. The expansion areas are also compliant with BMSJLP Policy LP32 as it is an extension to the existing facility in C2 Use Class. Both expansion areas are located within the AONB. The local policy on AONB does not outright restrict any development however, great weight should be given to conserving and enhancing the AONB. Therefore, with good design and environmental consideration the expansions could be compliant with BMSJLP Policy LP19. While the BMSJLP is not yet adopted it must be given material consideration. In addition, it is compliant with Babergh Local Plan (saved policies) Policy CR02 as there is no alternative location for this development given that the entre school is within the AONB.

Summary of justification for rating

Conclusions	Assessment
	The site as a allocation in the Neighbourhood Plan should be discussed with BMSDC and the Suffolk County Council as the Local Authority for education and should have regard to the Districtwide Education Policy.
	As the wider site as submitted has a high number of constraints (extensive heritage assets, TPOs and AONB designation and it is on the boundary of the Stour Estuary SSSI), the entire site would not be appropriate for development; only the two expansion areas specifically proposed for new buildings were assessed for their suitability for development. However, the wider site could be proposed as a site allocation to allow for additional facilities to be provided as required by the school and set out in the RHS proposal. Provision of additional facilities as part of a neighbourhood plan allocation should be discussed with the Local Planning Authority.

# 4. Neighbourhood Planning Site Assessment

# Site Details

Topic	Details
Site Reference / Name	4
Site 4	

Topic	Details
Site Address / Location	Land at Hyams Lane, Holbrook
Gross Site Area (Hectares)	2.65
SHLAA/SHELAA Reference (if applicable)	SS0215
SHLAA/SHELAA Conclusions (if applicable)	SHELAA 2017 Conclusons: Site is potentially suitable, but the following considerations would require further investigation: Highways – regarding access, footpaths and infrastructure required 'Cordon sanitaire'-consultation required with Anglian Water The site is potentially considered suitable for residential development, taking identified constraints into consideration. SHELAA 2019 Conclusions: Reason for discounting: Site lies within Cordon Sanitaire and lies within an area of high heritage sensitivity.
Existing land use	Agricultural
Land use being considered, if known (e.g. housing, community use, commercial, mixed use)	Housing
Development Capacity (Proposed by Landowner or SHLAA/HELAA)	55-60 Units
Site identification method / source (e.g. SHELAA, Call for Sites consultation, identified by neighbourhood planning group)	Neighbourhood Plan Call for Sites
Planning history (Live or previous planning applications/decisions)	None
Neighbouring uses	Existing settlement envelopes site on three sides, south of site is agricultural fields and sewage farm.

# Assessment of Suitability

#### **Environmental Constraints**

Indicator of Suitability	Assessment
Site is predominantly, or wholly, within or adjacent to the following statutory environmental designations:  Yes / No / partly or adjacent  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)  Does the site fall within a SSSI Impact Risk Zone and would the proposed use/development trigger the requirement to consult Natural England?	Yes -Adjacent to AONB, SSSI Impact Risk Zone (consultation required with Natural England for any residential development over 50 units within settlement boundary and over 10 outside existing settlements). Within Additional Project Area.
Site is predominantly, or wholly, within or adjacent to the following non statutory environmental designations:  Yes / No / partly or adjacent / Unknown  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	Yes - Drinking Water Safeguard Zones (Surface Water) (England)
Site is predominantly, or wholly, within Flood Zones 2 or 3?  See guidance notes: Flood Zone 1: Low Risk Flood Zone 2: Medium Risk Flood Zone 3 (less or more vulnerable site use): Medium Risk Flood Zone 3 (highly vulnerable site use): High Risk  Site is at risk of surface water flooding?	Lowrisk
See guidance notes:  - Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk  - >15% of the site is affected by medium or high risk of surface water flooding – Medium Risk	Very Low
Is the land classified as the best and most versatile agricultural land (Grades 1, 2 or 3a)  Yes / No / Unknown	No

Indicator of Suitability	Assessment
Site contains habitats with the potential to support priority species?  Does the site contain local wildlife-rich habitats?  Is the site part of:  UK BAP Priority Habitat;  a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);  wildlife corridors (and stepping stones that connect them); and/or  an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?  Yes / No / Unknown	No
Site is predominantly, or wholly, within or adjacent to an Air Quality Management Area (AQMA)?  Yes / No / Unknown	No

# **Physical Constraints**

Indicator of Suitability	Assessment
Is the site:	
Flat or relatively flat Gently sloping or uneven Steeply sloping	Gently sloping from north to south
Is there existing vehicle access to the site, or potential to create suitable access?	Yes - multiple access points could be easily created.
Yes /No /Unknown	
Is there existing pedestrian/cycle access to the site, or potential to create suitable access?	
Pedestrian? Yes/No/Unknown	Yes
Cycle? Yes/No/Unknown	Yes
Are there any Public Rights of Way (PRoW) crossing the site? Yes / No / Unknown	No
Are there any known Tree Preservation Orders on the site? Yes / No / Unknown	No
Are there veteran/ancient or other significant trees within or adjacent to the site? Are they owned by third parties?	
Significant trees? Yes, within / Yes, adjacent / No / Unknown	Yes, within
Potentially veteran or ancient trees present? Yes, within / Yes, adjacent / No / Unknown	Unknown
Owned by third parties? Yes / No / Unknown	Unknown
Is the site likely to be affected by ground contamination? Yes / No / Unknown	Unknown
Is there any utilities infrastructure crossing the site i.e. power lines/pipe lines, or is the site in close proximity to hazardous installations?  Yes / No / Unknown	Yes- power lines
Would development of the site result in a loss of social, amenity or community value? Yes / No / Unknown	No

### Accessibility

Factor	Guidance	
Distances to community facilities and services should be measured using walking routes from the centre of each site to each facility. Additional facilities can be added to the list. The distances are based on the assumption that 400m is equal to approximately 5 minutes' walk. This can be measured using Google Maps: <a href="https://www.google.com/maps">https://www.google.com/maps</a>		
What is the distance to the following facilities (measured from the edge of the site)	Distance (metres)	Comments
Town / local centre / shop	<400m 400-1200m >1200m	463
Bus /Tram Stop	<400m 400-800m >800m	273

Factor	Guidance	e
Train station	<400m 400-1200m >1200m	9977 – Ipswich
Primary School	<400m 400-1200m >1200m	568
Secondary School	<1600m 1600-3900m >3900m	1130
Open Space / recreation facilities	<400m 400-800m >800m	Adjacent to open space
Cycle Route	<400m 400-800m >800m	Unknown

# Landscape and Visual Constraints

This section should be answered based on existing evidence (see guidance notes) or by a qualified landscape consultant.

Indicator of Suitability	Assessment
Is the site low, medium or high sensitivity in terms of landscape?  Low sensitivity: the site has few or no valued features, and/or valued features that are less susceptible to development and can accommodate change.  Medium sensitivity: the site has many valued features, and/or valued features that are susceptible to development but could potentially accommodate some change with appropriate mitigation.  High sensitivity: the site has highly valued features, and/or valued features that are highly susceptible to development. The site can accommodate minimal change.	High
Is the site low, medium or high sensitivity in terms of visual amenity?  Low sensitivity: the site is visually enclosed and has low intervisibility with the surrounding landscape, and/or it would not adversely impact any identified views.  Medium sensitivity: the site is somewhat enclosed and has some intervisibility with the surrounding landscape, and/or it may adversely impact any identified views.  High sensitivity: the site is visually open and has high intervisibility with the surrounding landscape, and/or it would adversely impact any recognised views.	Low

Heritage Constraints

Indicator of Suitability	Assessment
Would the development of the site cause harm to a designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	Some impact
Would the development of the site cause harm to a non-designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	No impact

#### Planning policy constraints

Indicator of Suitability	Assessment
Is the site in the Green Belt? Yes / No / Unknown	No
Is the site allocated for a particular use (e.g. housing / employment) or designated as open space in the adopted and / or emerging Local Plan? Yes / No / Unknown	No
Are there any other relevant planning policies relating to the site?	JLP SP03 and Core Strategy Policy CS11 and CS20 Rural Exception Sites.
Is the site:	
Greenfield  A mix of greenfield and previously developed land Previously developed land?	Greenfield
Is the site within, adjacent to or outside the existing built up area?  Within the existing built up area (infill)?  Adjacent to and connected to the existing built up area?  Outside and not connected to the existing built up area?	Adjacent
Is the site within, adjacent to or outside the existing settlement boundary (if one exists)?	
Within the existing settlement boundary? Adjacent to and connected to the existing settlement boundary? Outside and not connected to the existing settlement boundary?	Adjacent
Would development of the site result in neighbouring settlements merging into one another?  Yes / No / Unknown	No

Indicator of Suitability	Assessment
Is the size of the site large enough to significantly change the size and character of the existing settlement? Yes / No / Unknown	No

# Assessment of Availability

Indicator of Availability	Assessment
Is the site available for development? Yes / No / Unknown.	Yes
Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?  Yes / No / Unknown.	Unknown
Is there a known time frame for availability?  Available now / 0-5 years / 6-10 years / 11-15 years.	the site could come forward in 0-5 years

# Viability

Indicators of Viability	Assessment
Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities?  Yes / No / Unknown.	Unknown
What evidence is available to support this judgement?	

#### Conclusions

Conclusions	Assessment
What is the expected development capacity of the site (either as proposed by site promoter or estimated through SHLAA/HELAA or Neighbourhood Plan Site Assessment)?	A revised capacity of 30 dwellings is recommended.
What is the likely timeframe for development (0-5/6-10/11-15/15+ years)	the site could come forward in 0-5 years
Other key information	N/A
Overall rating (Red/Amber/Green)	
The site is suitable and available The site is potentially suitable, and available. The site is not currently suitable, and available.	Red
Are there any known viability issues? Yes / No	Yes- power lines

This greenfield site is surrounded by the built-up area and settlement boundary on three sides. Development of this site would not constitute 'ribbon' development and would constitute only a small extension from the existing settlement boundary. It is located in relatively close proximity to the centre of the village and a number of services and facilities.

There is no current vehicle access however there is potential to provide multiple access points from the north east corner of the site off Five Acres and off Mill Rise. One issue is Hyams Lane that runs the length of the southern border of the site is a very narrow road and could not facilitate any more traffic than it already receives. While the direct access points would not lead on to this road the number of cars in the area would increase in general and the road would potentially require upgrading.

Hyams House Grade II Listed Building and Church of All Saints Grade II\* Listed Building are located in close proximity to the site, however development on the site is unlikely to have adverse impact on the heritage assets.

The site is within an area of 'Cordan Sanitaire' which requires consultation with Anglian Water. The Suffolk Coast and Heaths AONB borders the site along the southern boundary which would require significant mitigation measures. The site falls within the Additional Project Area and is in the Stour Estuary SSSI Impact Risk Zone. 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. The site is fairly well contained and does not have long ranging views into or out of the site. Some screening may be required from the existing dwellings along Five Acres road. It is likely the site would be considered to have high landscape sensitivity and low visual sensitivity; however, the specialist landscape assessment is outstanding.

There is utilities infrastructure (power lines) crossing the site, which may cause viability issues to relocate. In addition, there are some mature trees on the site that should be left.

If this site is chosen for allocation in HNP it is suggested that the northern end of the site is considered for allocation as this is closest to the village centre, where best access points are located, would provide a buffer for the AONB and would leave capacity for the road along the south to expand. A reduced density of 30 dwellings is suggested in order to retain the rural character of the village.

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.

However, the site is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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 is not yet adopted it must be given material consideration. It is possible that the site could be allocated for

Summary of justification for rating

Conclusions	Assessment
	development as it is compliant with policy in the Core Strategy, however consultation with the Council would be required to determine its suitability in light of the emerging policy.
	If this site is considered as a reserve allocation in the HNP the northern part adjacent to the settlement would be most suitable as this is closest to the village centre and access is possible.
	In conclusion, this site is not suitable for allocation in the Neighbourhood Plan as there is no housing requirement in the area however, could be considered as a reserve site or included in a rural exception policy subject to consultation with Anglian Water and the Local Planning Authority.

# 5. Neighbourhood Planning Site Assessment

# Site Details

Topic	Details
Site Reference / Name	5
Site 5	
Site Address / Location	Land west of The Street
Gross Site Area (Hectares)	1.45 (estimate from Google Earth)
SHLAA/SHELAA Reference (if applicable)	N/A
SHLAA/SHELAA Conclusions (if applicable)	N/A
Existing land use	Paddock
Land use being considered, if known (e.g. housing, community use, commercial, mixed use)	Housing
Development Capacity (Proposed by Landowner or SHLAA/HELAA)	36-43
Site identification method / source (e.g. SHELAA, Call for Sites consultation, identified by neighbourhood planning group)	Neighbourhood Plan Call for Sites
Planning history (Live or previous planning applications/decisions)	None
Neighbouring uses	Sporadic housing around the site, Holbrook sports club and school playing fields to the east.

# Assessment of Suitability

#### **Environmental Constraints**

Indicator of Suitability	Assessment
Site is predominantly, or wholly, within or adjacent to the following statutory environmental designations:  Yes / No / partly or adjacent  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)  Does the site fall within a SSSI Impact Risk Zone and would the proposed use/development trigger the requirement to consult Natural England?	Yes - Special Landscape Area, SSSI Impact Risk Zone (consultation required with Natural England for any residential development over 50 units within settlement boundary and over 10 outside existing settlements). Within Additional Project Area.
Site is predominantly, or wholly, within or adjacent to the following non statutory environmental designations:  Yes / No / partly or adjacent / Unknown  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	Yes - Drinking water safeguard zone (surface water)
Site is predominantly, or wholly, within Flood Zones 2 or 3?  See guidance notes: Flood Zone 1: Low Risk Flood Zone 2: Medium Risk Flood Zone 3 (less or more vulnerable site use): Medium Risk Flood Zone 3 (highly vulnerable site use): High Risk  Site is at risk of surface water flooding?  See guidance notes:  - Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk  - >15% of the site is affected by medium or high risk of surface water flooding – Medium Risk	Low risk  Very Low
Is the land classified as the best and most versatile agricultural land (Grades 1, 2 or 3a)  Yes / No / Unknown	Yes

Indicator of Suitability	Assessment
Site contains habitats with the potential to support priority species?	
Does the site contain local wildlife-rich habitats?	
Is the site part of:	
<ul> <li>UK BAP Priority Habitat;</li> <li>a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);</li> <li>wildlife corridors (and stepping stones that connect them); and/or</li> <li>an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?</li> </ul> Yes / No / Unknown	No
Site is <b>predominantly, or wholly, within or adjacent to</b> an Air Quality Management Area (AQMA)?	
Yes / No / Unknown	No

# **Physical Constraints**

Indicator of Suitability	Assessment
Is the site:	
Flat or relatively flat Gently sloping or uneven Steeply sloping	Flat
Is there existing vehicle access to the site, or potential to create suitable access?	Yes - could be created.
Yes / No / Unknown  Is there existing pedestrian/cycle access to the site, or	
potential to create suitable access?	
Pedestrian? Yes/No/Unknown	Yes
Cycle? Yes / No / Unknown	Yes
Are there any Public Rights of Way (PRoW) crossing the site? Yes / No / Unknown	No - Adjacent
Are there any known Tree Preservation Orders on the site? Yes / No / Unknown	No
Are there veteran/ancient or other significant trees within or adjacent to the site? Are they owned by third parties?	
Significant trees? Yes, within / Yes, adjacent / No / Unknown	No
Potentially veteran or ancient trees present? Yes, within / Yes, adjacent / No / Unknown Owned by third parties?	No
Yes / No / Unknown	Unknown
Is the site likely to be affected by ground contamination? Yes / No / Unknown	Unknown
Is there any utilities infrastructure crossing the site i.e. power lines/pipe lines, or is the site in close proximity to hazardous installations?  Yes / No / Unknown	Yes- Power lines
Would development of the site result in a loss of social, amenity or community value? Yes / No / Unknown	No

### Accessibility

Factor	Guidance	
Distances to community facilities and services should be measured using walking routes from the centre of each site to each facility. Additional facilities can be added to the list. The distances are based on the assumption that 400m is equal to approximately 5 minutes' walk. This can be measured using Google Maps: <a href="https://www.google.com/maps">https://www.google.com/maps</a>		
What is the distance to the following facilities (measured from the edge of the site)	Distance (metres)	Comments
Town / local centre / shop	<400m 400-1200m >1200m	543
Bus /Tram Stop	<400m 400-800m >800m	839

Factor	Guidance	
Train station	<400m 400-1200m >1200m	9495 - Ipswich
Primary School	<400m 400-1200m >1200m	355
Secondary School	<1600m 1600-3900m >3900m	1240
Open Space / recreation facilities	<400m 400-800m >800m	Adjacent to Open Space and Holbrook Sport Centre.
Cycle Route	<400m 400-800m >800m	Unknown

# Landscape and Visual Constraints

This section should be answered based on existing evidence (see guidance notes) or by a qualified landscape consultant.

Indicator of Suitability	Assessment
Is the site low, medium or high sensitivity in terms of landscape?  Low sensitivity: the site has few or no valued features, and/or valued features that are less susceptible to development and can accommodate change.  Medium sensitivity: the site has many valued features, and/or valued features that are susceptible to development but could potentially accommodate some change with appropriate mitigation.  High sensitivity: the site has highly valued features, and/or valued features that are highly susceptible to development. The site can accommodate minimal change.	High
Is the site low, medium or high sensitivity in terms of visual amenity?  Low sensitivity: the site is visually enclosed and has low intervisibility with the surrounding landscape, and/or it would not adversely impact any identified views.  Medium sensitivity: the site is somewhat enclosed and has some intervisibility with the surrounding landscape, and/or it may adversely impact any identified views.  High sensitivity: the site is visually open and has high intervisibility with the surrounding landscape, and/or it would adversely impact any recognised views.	Low

Heritage Constraints

Indicator of Suitability	Assessment
Would the development of the site cause harm to a designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	Some impact
Would the development of the site cause harm to a non-designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	No impact

#### Planning policy constraints

Indicator of Suitability	Assessment
Is the site in the Green Belt? Yes / No / Unknown	No
Is the site allocated for a particular use (e.g. housing / employment) or designated as open space in the adopted and / or emerging Local Plan? Yes / No / Unknown	No
Are there any other relevant planning policies relating to the site?	JLP SP03 and Core Strategy Policy CS11 and CS20 Rural Exception Sites.
Is the site:	
Greenfield  A mix of greenfield and previously developed land Previously developed land?	Greenfield
Is the site within, adjacent to or outside the existing built up area?  Within the existing built up area (infill)?  Adjacent to and connected to the existing built up area?  Outside and not connected to the existing built up area?	Outside
Is the site within, adjacent to or outside the existing settlement boundary (if one exists)?  Within the existing settlement boundary?  Adjacent to and connected to the existing settlement boundary?  Outside and not connected to the existing settlement	Outside
boundary?  Would development of the site result in neighbouring settlements merging into one another?  Yes / No / Unknown	No

Indicator of Suitability	Assessment
Is the size of the site large enough to significantly change the size and character of the existing settlement?  Yes / No / Unknown	No

#### Assessment of Availability

Indicator of Availability	Assessment
Is the site available for development? Yes / No / Unknown.	Yes
Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?  Yes / No / Unknown.	Unknown
Is there a known time frame for availability?  Available now / 0-5 years / 6-10 years / 11-15 years.	Unknown

# Viability

Indicators of Viability	Assessment
Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities?  Yes / No / Unknown.	Unknown
What evidence is available to support this judgement?	

#### Conclusions

Conclusions	Assessment
What is the expected development capacity of the site (either as proposed by site promoter or estimated through SHLAA/HELAA or Neighbourhood Plan Site Assessment)?	N/A
What is the likely timeframe for development (0-5/6-10/11-15/15+ years)	Unknown
Other key information	N/A
Overall rating (Red/Amber/Green)	
The site is suitable and available The site is potentially suitable, and available. The site is not currently suitable, and available.	Red
Are there any known viability issues? Yes / No	Unknown

Conclusions	Assessment
	This greenfield site is located outside both the built-up area and settlement boundary.
	There is current pedestrian access to the site via the PRoW that runs adjacent to the southern border of the site. Vehicular access could be provided relatively easily, without excessive removal of hedgerows, from the north eastern corner of the site off The Street. The Street between the site and the village centre would need upgrading or modifying to provide pedestrian or shared road access to the centre.
	Grade II Listed Building Orchard Cottage is located south of the site and Browns Farmhouse is located to the west of the site.  This is not considered a major constraint as there is already a small buffer between the site and the heritage assets however any proposals may have to consider this in their design.
Summary of justification for rating	The site has relatively little impact on the AONB compared to the other sites however it does fall within the Additional Project Area and is in Stour Estuary SSSI Impact Risk Zone. In addition, the land is classed as best quality agricultural land. 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. The site is partially screened on two sides but is mostly well contained as it does not have very long ranging views. 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.
	There is utilities infrastructure (power lines) crossing the site, which may cause viability issues to relocate.
	The site is not compliant with Core Strategy Policy CS11 as it is not within or adjacent to the built-up area. In addition, the site is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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. The site is also not appropriate for an allocation as a Rural Exception Site, under Core Strategy Policy CS20, as it is not located adjacent to or well related to the settlement boundary.
	In conclusion, this site is unsuitable for allocation as it does not comply with CS11 or CS20. The site is also subject to constraints relating to its impact upon the SSSI and provision of vehicular access.

# 6. Neighbourhood Planning Site Assessment

# Site Details

Topic	Details
Site Reference / Name	6
Site 6	

Topic	Details
Site Address / Location	Land west of B1080 and north of Woodlands Road
Gross Site Area (Hectares)	3.3
SHLAA/SHELAA Reference (if applicable)	SS0201
SHLAA/SHELAA Conclusions (if applicable)	SHELAA 2017 Conclusion: 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 will need to be considered compability - appropriate design would need to be considered with regards to providing a natural buffer between development and open countryside Townscape - partial development may be more appropriate and supportable. The site is potentially considered suitable for residential development, taking identified constraints into consideration. However only part development (southern aspect of site) is recommended in order to avoid disproportionate development to the existing settlement.  Estimated new net site area: 1.5ha  SHELAA 2019 Conclusion: Unsuitable. Reason for discounting - Site has poor connectivity to the existing settlement.
Existing land use	Agricultural
Land use being considered, if known (e.g. housing, community use, commercial, mixed use)	Housing
Development Capacity (Proposed by Landowner or SHLAA/HELAA)	70 Dwellings
Site identification method / source (e.g. SHELAA, Call for Sites consultation, identified by neighbourhood planning group)	Neighbourhood Plan Call for Sites
Planning history (Live or previous planning applications/decisions)	DC/17/06037 Outline Application-erection of 30 dwellings (withdrawn May 2018 but the comitte report minded to refuse the application) - Application on southern half of the site. It was minded to refuse due to due to lack of compliance with local policy (Core Strategy policy CS2 and policy CS11) and the development of Grade 2 Agricultural Land which is contrary to the NPPF.
Neighbouring uses	Agricultural, and to the south existing residential settlement.

# Assessment of Suitability

#### **Environmental Constraints**

Indicator of Suitability	Assessment
Site is predominantly, or wholly, within or adjacent to the following statutory environmental designations:  Yes / No / partly or adjacent  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)  Does the site fall within a SSSI Impact Risk Zone and would the proposed use/development trigger the requirement to consult Natural England?	Yes - Close to AONB, SSSI Impact Risk Zone (consultation required with Natural England for any residential development over 50 units within settlement boundary and over 10 outside existing settlements). Within Additional Project Area.
Site is predominantly, or wholly, within or adjacent to the following non statutory environmental designations:  Yes / No / partly or adjacent / Unknown  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	Yes - Drinking Water Safeguard Zones (Surface Water) (England)
Site is predominantly, or wholly, within Flood Zones 2 or 3?  See guidance notes: Flood Zone 1: Low Risk Flood Zone 2: Medium Risk Flood Zone 3 (less or more vulnerable site use): Medium Risk Flood Zone 3 (highly vulnerable site use): High Risk  Site is at risk of surface water flooding?  See guidance notes:  - Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk  - >15% of the site is affected by medium or high risk of surface water flooding – Medium Risk	Low risk  Very low
Is the land classified as the best and most versatile agricultural land (Grades 1, 2 or 3a)  Yes / No / Unknown	Yes

Indicator of Suitability	Assessment
Site contains habitats with the potential to support priority species?	
Does the site contain local wildlife-rich habitats?	
Is the site part of:	
<ul> <li>UK BAP Priority Habitat;</li> <li>a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);</li> <li>wildlife corridors (and stepping stones that connect them); and/or</li> <li>an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?</li> </ul> Yes / No / Unknown	No
Site is <b>predominantly, or wholly, within or adjacent to</b> an	
Air Quality Management Area (AQMA)?  Yes / No / Unknown	No

#### **Physical Constraints**

Indicator of Suitability	Assessment
Is the site:	
Flat or relatively flat Gently sloping or uneven Steeply sloping	Flat
Is there existing vehicle access to the site, or potential to create suitable access?	Yes- access could be provided.
Yes / No / Unknown  Is there existing pedestrian/cycle access to the site, or	
potential to create suitable access?	
Pedestrian?	
Yes / No / Unknown	Yes
Cycle?	Vac
Yes / No / Unknown	Yes
Are there any Public Rights of Way (PRoW) crossing the site? Yes / No / Unknown	No
Are there any known Tree Preservation Orders on the site? Yes / No / Unknown	No
Are there veteran/ancient or other significant trees within or adjacent to the site? Are they owned by third parties?	
Significant trees?	
Yes, within / Yes, adjacent / No / Unknown	Yes, adjacent
Potentially veteran or ancient trees present? Yes, within / Yes, adjacent / No / Unknown	No
Owned by third parties?	
Yes / No / Unknown	Unknown
Is the site likely to be affected by ground contamination? Yes / No / Unknown	Unknown
Is there any utilities infrastructure crossing the site i.e. power lines/pipe lines, or is the site in close proximity to hazardous installations?  Yes / No / Unknown	No
Would development of the site result in a loss of social, amenity or community value?  Yes / No / Unknown	No

#### Accessibility

Factor	Guidance	
,	pe added to the list. The distances ar	walking routes from the centre of each site to e based on the assumption that 400m is equal os: https://www.google.com/maps
What is the distance to the following facilities (measured from the edge of the site)	Distance (metres)	Comments
Town / local centre / shop	<400m 400-1200m >1200m	1120
Bus /Tram Stop	<400m 400-800m >800m	0

Factor	Guidance	
Train station	<400m 400-1200m >1200m	8368 – Ipswich
Primary School	<400m 400-1200m >1200m	948
Secondary School	<1600m 1600-3900m >3900m	384
Open Space / recreation facilities	<400m 400-800m >800m	Adjacent to open space
Cycle Route	<400m 400-800m >800m	Unknown

# Landscape and Visual Constraints

This section should be answered based on existing evidence (see guidance notes) or by a qualified landscape consultant.

Indicator of Suitability	Assessment
Is the site low, medium or high sensitivity in terms of landscape?  Low sensitivity: the site has few or no valued features, and/or valued features that are less susceptible to development and can accommodate change.  Medium sensitivity: the site has many valued features, and/or valued features that are susceptible to development but could potentially accommodate some change with appropriate mitigation.  High sensitivity: the site has highly valued features, and/or valued features that are highly susceptible to development. The site can accommodate minimal change.	High
Is the site low, medium or high sensitivity in terms of visual amenity?  Low sensitivity: the site is visually enclosed and has low intervisibility with the surrounding landscape, and/or it would not adversely impact any identified views.  Medium sensitivity: the site is somewhat enclosed and has some intervisibility with the surrounding landscape, and/or it may adversely impact any identified views.  High sensitivity: the site is visually open and has high intervisibility with the surrounding landscape, and/or it would adversely impact any recognised views.	Medium

Heritage Constraints

Indicator of Suitability	Assessment
Would the development of the site cause harm to a designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	Some impact
Would the development of the site cause harm to a non-designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	No impact

#### Planning policy constraints

Indicator of Suitability	Assessment
Is the site in the Green Belt? Yes / No / Unknown	No
Is the site allocated for a particular use (e.g. housing / employment) or designated as open space in the adopted and / or emerging Local Plan? Yes / No / Unknown	No
Are there any other relevant planning policies relating to the site?	JLP SP03 and Core Strategy Policy CS11 and CS20 Rural Exception Sites.
Is the site:	
Greenfield  A mix of greenfield and previously developed land Previously developed land?	Greenfield
Is the site within, adjacent to or outside the existing built up area?  Within the existing built up area (infill)?  Adjacent to and connected to the existing built up area?  Outside and not connected to the existing built up area?	Adjacent
Is the site within, adjacent to or outside the existing settlement boundary (if one exists)?	
Within the existing settlement boundary? Adjacent to and connected to the existing settlement boundary? Outside and not connected to the existing settlement boundary?	Adjacent
Would development of the site result in neighbouring settlements merging into one another?  Yes / No / Unknown	No

Indicator of Suitability	Assessment
Is the size of the site large enough to significantly change the size and character of the existing settlement? Yes / No / Unknown	Yes

# Assessment of Availability

Indicator of Availability	Assessment
Is the site available for development? Yes / No / Unknown.	Yes - Landowner did not put site forward in the Neighbourhood Plans Call for Sites however it was put forward in the Councils Call for Sites and had a planning application submitted (2017) so it can be assumed this site is available.
Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?  Yes / No / Unknown.	Unknown
Is there a known time frame for availability?  Available now / 0-5 years / 6-10 years / 11-15 years.	proposed 0-5 years deliverability

# Viability

Indicators of Viability	Assessment
Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities?  Yes / No / Unknown.  What evidence is available to support this judgement?	Unknown

# Conclusions

Conclusions	Assessment
What is the expected development capacity of the site (either as proposed by site promoter or estimated through SHLAA/HELAA or Neighbourhood Plan Site Assessment)?	N/A
What is the likely timeframe for development (0-5/6-10/11-15/15+ years)	proposed 0-5 years deliverability
Other key information	N/A
Overall rating (Red/Amber/Green)	
The site is suitable and available The site is potentially suitable, and available. The site is not currently suitable, and available.	Red
Are there any known viability issues? Yes / No	

This greenfield site is adjacent to both the built-up are and the settlement boundary. It is located at the other end of the village to most of the services and facilities (approximately 20 minute walk), reducing the likelihood of walking as the primary mode of transport.

Planning Application ref. DC/17/06037, which constitutes the southern part of the site and proposed 30 dwellings, was minded for refusal at Planning Comittee in 2017 due to lack of compliance with local policy (Core Strategy policy CS2 and policy CS11) and the development of Grade 2 Agricultural Land which is contrary to the NPPF.

It would be possible to provide vehicle access onto the site without the removal of hedgerows however, the road that access would be provided from may not be adequate to facilitate an increase in traffic. It is a very narrow lane that cannot fit two vehicles down, making it dangerous for both car users and pedestrians. This lane leads onto a main road at a bend resulting in reduced visibility. However, previous planning application stated that highway safety concerns are not a defendable reason for refusal.

The site is within close proximity to a Grade II Listed Building, Cherry Ground, given the openness of the land there is not much natural buffer and the site can easily be seen from the building. In addition, there is a scheduled ancient monument located to the north of the site. Mitigation measures would be required to ensure there was no harm on this heritage asset.

The site is in close proximity to the proposed AONB extension, is within the Additional Project Area and the Stour Estuary SSSI Impact Risk Zone therefore development of this site would require consultation with Natural England. There are potential views onto the Freston and Culter's Woods With Holbrook Park SSSI to the north. 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. The site is flat and open with long ranging views only limitedly screened on 2 sides by hedgerows with PRoW adjacent to the east. Previous planning application was minded for refusal by the Planning Officer due to the potential impact on the AONB. It is likely that the site would be considered to have high landscape sensitivity and medium visual sensitivity, however the specialist landscape assessment is outstanding.

The site juts out into the countryside and is not connected to the existing sewerage system.

The site was not deemed to be compliant with Core Strategy Policy CS11 in a previous planning application due to locational context as it would constitute ribbon development. In addition, the site is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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 is not yet adopted this draft policy must be given material

Summary of justification for rating

Conclusions	Assessment
	consideration. In addition, development at this site would consitutue ribbon development and would detract from the existing village form.

# 7. Neighbourhood Planning Site Assessment

# Site Details

Topic	Details
Site Reference / Name	7
Site 7	
Site Address / Location	Land South of Woodlands Road
Gross Site Area (Hectares)	4 (estimate from Google Earth)
SHLAA/SHELAA Reference (if applicable)	SS0261
SHLAA/SHELAA Conclusions (if applicable)	SHELAA 2019 Conclusion: Unsuitable due to no possibility of creating suitable access to the site.
Existing land use	Agricultural/ gardens
Land use being considered, if known (e.g. housing, community use, commercial, mixed use)	Housing
Development Capacity (Proposed by Landowner or SHLAA/HELAA)	90-117
Site identification method / source (e.g. SHELAA, Call for Sites consultation, identified by neighbourhood planning group)	Council Call for Sites
Planning history (Live or previous planning applications/decisions)	N/A
Neighbouring uses	Residential and agricultural

# Assessment of Suitability

#### **Environmental Constraints**

Indicator of Suitability	Assessment
Site is predominantly, or wholly, within or adjacent to the following statutory environmental designations:  Yes / No / partly or adjacent  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)  Does the site fall within a SSSI Impact Risk Zone and would the proposed use/development trigger the requirement to	Yes - Near to AONB, SSSI Impact Risk Zone (consultation required with Natural England for any residential development over 50 units within settlement boundary and over 10 outside existing settlements).  Within Additional Project Area.
consult Natural England?  Site is predominantly, or wholly, within or adjacent to the following non statutory environmental designations:  Yes / No / partly or adjacent / Unknown  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	Yes - Drinking Water Safeguard Zones (Surface Water) (England)
Site is predominantly, or wholly, within Flood Zones 2 or 3?  See guidance notes: Flood Zone 1: Low Risk Flood Zone 2: Medium Risk Flood Zone 3 (less or more vulnerable site use): Medium Risk Flood Zone 3 (highly vulnerable site use): High Risk  Site is at risk of surface water flooding?	Low risk
- Less than 15% of the site is affected by medium or high risk of surface water flooding – Low Risk - >15% of the site is affected by medium or high risk of surface water flooding – Medium Risk	Very low
Is the land classified as the best and most versatile agricultural land (Grades 1, 2 or 3a)  Yes / No / Unknown	Yes

Indicator of Suitability	Assessment
Site contains habitats with the potential to support priority species?	
Does the site contain local wildlife-rich habitats?	
Is the site part of:	
<ul> <li>UK BAP Priority Habitat;</li> <li>a wider ecological network (including the hierarchy of international, national and locally designated sites of importance for biodiversity);</li> <li>wildlife corridors (and stepping stones that connect them); and/or</li> <li>an area identified by national and local partnerships for habitat management, enhancement, restoration or creation?</li> </ul> Yes / No / Unknown	No
Site is predominantly, or wholly, within or adjacent to an	
Air Quality Management Area (AQMA)?	No
Yes / No / Unknown	

## **Physical Constraints**

Indicator of Suitability	Assessment
Is the site:	
Flat or relatively flat Gently sloping or uneven Steeply sloping	Flat
Is there existing vehicle access to the site, or potential to create suitable access?	Yes - access could be created
Yes/No/Unknown	
Is there existing pedestrian/cycle access to the site, or potential to create suitable access?	
Pedestrian? Yes/No/Unknown	Yes
Cycle? Yes / No / Unknown	Yes
Are there any Public Rights of Way (PRoW) crossing the site? Yes / No / Unknown	Yes
Are there any known Tree Preservation Orders on the site? Yes / No / Unknown	Unknown
Are there veteran/ancient or other significant trees within or adjacent to the site? Are they owned by third parties?	
Significant trees?	
Yes, within / Yes, adjacent / No / Unknown	Yes, adjacent
Potentially veteran or ancient trees present?  Yes, within / Yes, adjacent / No / Unknown	Unknown
Owned by third parties?	
Yes / No / Unknown	Unknown
Is the site likely to be affected by ground contamination? Yes / No / Unknown	Unknown
Is there any utilities infrastructure crossing the site i.e. power lines/pipe lines, or is the site in close proximity to hazardous installations?  Yes / No / Unknown	Yes-power lines
Would development of the site result in a loss of social, amenity or community value?  Yes / No / Unknown	No

#### Accessibility

Factor		Guidance	
each facility. Additional facilities can l	oe added to the list. Th	sured using walking routes from the centre of ea distances are based on the assumption that 400 Google Maps: https://www.google.com/maps	
What is the distance to the following facilities (measured from the edge of the site)	Distance (metres)	Comments	
Town / local centre / shop	<400- >12	200m	
Bus /Tram Stop	<400- >80	00m	

Factor	Guidance	
Train station	<400m 400-1200m >1200m	8990 – Ipswich
Primary School	<400m 400-1200m >1200m	773
Secondary School	<1600m 1600-3900m >3900m	785
Open Space / recreation facilities	<400m 400-800m >800m	Adjacent
Cycle Route	<400m 400-800m >800m	Unknown

## Landscape and Visual Constraints

This section should be answered based on existing evidence (see guidance notes) or by a qualified landscape consultant.

Indicator of Suitability	Assessment
Is the site low, medium or high sensitivity in terms of landscape?  Low sensitivity: the site has few or no valued features, and/or valued features that are less susceptible to development and can accommodate change.  Medium sensitivity: the site has many valued features, and/or valued features that are susceptible to development but could potentially accommodate some change with appropriate mitigation.  High sensitivity: the site has highly valued features, and/or valued features that are highly susceptible to development. The site can accommodate minimal change.	High
Is the site low, medium or high sensitivity in terms of visual amenity?  Low sensitivity: the site is visually enclosed and has low intervisibility with the surrounding landscape, and/or it would not adversely impact any identified views.  Medium sensitivity: the site is somewhat enclosed and has some intervisibility with the surrounding landscape, and/or it may adversely impact any identified views.  High sensitivity: the site is visually open and has high intervisibility with the surrounding landscape, and/or it would adversely impact any recognised views.	Medium

Heritage Constraints

Indicator of Suitability	Assessment
Would the development of the site cause harm to a designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	Some impact
Would the development of the site cause harm to a non-designated heritage asset or its setting?  Directly impact and/or mitigation not possible Some impact, and/or mitigation possible Limited or no impact or no requirement for mitigation	No impact

#### Planning policy constraints

Indicator of Suitability	Assessment
Is the site in the Green Belt? Yes / No / Unknown	No
Is the site allocated for a particular use (e.g. housing / employment) or designated as open space in the adopted and / or emerging Local Plan? Yes / No / Unknown	No
Are there any other relevant planning policies relating to the site?	JLP SP03 and Core Strategy Policy CS11 and CS20 Rural Exception Sites.
Is the site:	
Greenfield  A mix of greenfield and previously developed land Previously developed land?	Greenfield
Is the site within, adjacent to or outside the existing built up area?  Within the existing built up area (infill)?  Adjacent to and connected to the existing built up area?  Outside and not connected to the existing built up area?	One corner is adjacent and otherwise is outside the built up area.
Is the site within, adjacent to or outside the existing settlement boundary (if one exists)?	
Within the existing settlement boundary? Adjacent to and connected to the existing settlement boundary? Outside and not connected to the existing settlement boundary?	One corner is adjacent and otherwise is outside the built up area.
Would development of the site result in neighbouring settlements merging into one another?  Yes / No / Unknown	No

Indicator of Suitability	Assessment
Is the size of the site large enough to significantly change the size and character of the existing settlement?  Yes / No / Unknown	No

## Assessment of Availability

Indicator of Availability	Assessment
Is the site available for development? Yes / No / Unknown.	Yes - assumed as put forward in Council Call for Sites.
Are there any known legal or ownership problems such as unresolved multiple ownerships, ransom strips, tenancies, or operational requirements of landowners?  Yes / No / Unknown.	Unknown
Is there a known time frame for availability?  Available now / 0-5 years / 6-10 years / 11-15 years.	Unknown

## Viability

Indicators of Viability	Assessment
Is the site subject to any abnormal costs that could affect viability, such as demolition, land remediation or relocating utilities?  Yes / No / Unknown.	Yes- relocation of power lines
What evidence is available to support this judgement?	

#### Conclusions

Conclusions	Assessment
What is the expected development capacity of the site (either as proposed by site promoter or estimated through SHLAA/HELAA or Neighbourhood Plan Site Assessment)?	N/A
What is the likely timeframe for development? (0-5 / 6-10 / 11-15 / 15+ years)	Unknown
Other key information	N/A
Overall rating (Red/Amber/Green)	
The site is suitable and available The site is potentially suitable, and available. The site is not currently suitable, and available.	Red
Are there any known viability issues? Yes / No	Yes- power lines

This greenfield site is adjacent to both the built-up area and the settlement boundary. Development of the entire site would extend into open countryside and would not relate well to the existing settlement. However, if only a small portion of the site between the settlement edge and the care home was considered, this would have less of an impact on the surround countryside and is approximately 10-15-minute walk to key services and facilities.

There is no current access. It would be possible to create access off Woodlands Road, however this site faces the same issue as Site 6 in that Woodlands Road is very narrow and could not facilitate an increase in traffic. There may be potential to create access off The Street. However, this poses similar issues. Lack of suitable access is the reason this site was discounted in the 2019 SHELAA which demonstrates the major constraint this is for the site.

The site is within close proximity to a Grade II Listed Building, Cherry Ground, given the openness of the land there is not much natural buffer and the site can easily be seen from the building.

The site is in close proximity to the proposed AONB extension, is within the Additional Project Area and the Stour Estuary SSSI Impact Risk Zone therefore development of this site would require consultation with Natural England 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. The site is fairly well screened on three sides but is open with long ranging views to the north. Site 6, next to this site, had planning permission refused due to the impact on the AONB so it is likely this site would face similar constraints. It is likely that this site would be considered to have high landscape and visual sensitivity; however, the specialist landscape assessment is outstanding.

There is utilities infrastructure (power lines) crossing the site, which may cause viability issues to relocate.

The site is not compliant with Core Strategy Policy CS11 as it is not within or adjacent to the built-up area (except for a very small potion which is adjacent) and there is no special justification for inclusion. In addition, the site is not compliant with emerging Joint Local Plan Policy SP03 as it is outside 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 is not yet adopted this draft policy must be given material consideration.

In conclusion, this site is not suitable for allocation in the Neighbourhood Plan as there is no housing requirement in the area however, could be considered as a reserve site or included in a rural exception policy subject to consultation with the Local Planning Authority. Access would need to be confirmed as this was highlighted in a previous SHELAA as being a constraint to development.

Summary of justification for rating

Conclusions	Assessment