



HOLBROOK NEIGHBOURHOOD PLAN

2022-2037

Referendum Version
Summer 2023

TABLE OF CONTENTS

1	WELCOME TO THE NEIGHBOURHOOD PLAN FOR HOLBROOK.....	3
2	PRELIMINARIES.....	3
3	INTRODUCTION: NATIONAL AND LOCAL PLANNING CONTEXT	4
4	ACHIEVING SUSTAINABLE DEVELOPMENT	9
5	HOLBROOK TODAY	10
6	EVIDENCE BASE.....	23
7	KEY ISSUES / CHALLENGES FOR HOLBROOK	32
8	VISION AND OBJECTIVES.....	33
9	OVERARCHING PLANNING CONTEXT	34
10	NEIGHBOURHOOD PLAN POLICIES	37
HNP 01:	HOUSING DEVELOPMENT	37
HNP 02:	HOUSING MIX.....	39
HNP 03:	INFILL DEVELOPMENT.....	41
HNP 04:	ROYAL HOSPITAL SCHOOL (RHS).....	43
HNP 05:	DESIGN	46
HNP 06:	PROTECTION OF IMPORTANT VIEWS	50
HNP 07:	PRESERVATION OF DARK SKIES.....	55
HNP 08:	LANDSCAPE PROTECTION	57
HNP 09:	PROTECTION OF WOODLANDS	61
HNP 10:	PROTECTION OF HERITAGE ASSETS.....	63
HNP 11:	GARDENS AND AMENITY	65
HNP 12:	SUSTAINABLE DRAINAGE AND FLOOD RISK	67
HNP 13:	BIODIVERSITY	68
HNP 14:	LOCAL GREEN SPACES.....	72
11	COMMUNITY ASPIRATIONS	76
12	MONITORING AND REVIEW	79
13	APPENDIX A – HOLBROOK NEIGHBOURHOOD PLAN WORKING GROUP MEMBERS	79
14	APPENDIX B – HOLBROOK NEIGHBOURHOOD PLAN AREA: LOCAL GREEN SPACE JUSTIFICATION	80
15	APPENDIX C – GLOSSARY	93
16	REFERENCE SOURCES.....	97
17	POLICIES MAP	99

1 WELCOME TO THE NEIGHBOURHOOD PLAN FOR HOLBROOK

What is a Neighbourhood Plan?

- 1.1 The Holbrook Neighbourhood Development Plan provides the first ever statutory planning policy document specifically for the Parish of Holbrook. Neighbourhood Plans such as this were made possible by powers contained within the 2011 Localism Act which sought to decentralise 'policy-making' to the local level and give more powers to communities and the right to shape future development where they live.
- 1.2 The Neighbourhood Plan is a community-led document for guiding the future development of the parish and it sets out a vision for an area and proposes planning policies for the use and development of land. Once the Neighbourhood Plan has been made by Babergh District Council, following a successful referendum, it forms part of the statutory planning framework for the area and the policies and proposals contained within it are used as a basis for the determination of planning applications, alongside the District Local Plan for Babergh.
- 1.3 The Holbrook Neighbourhood Plan complements existing national and local planning policy by providing a specifically local level of detail attained through consultation with the local community and further research. Commissioned by Holbrook Parish Council, the Holbrook Neighbourhood Plan has been developed by a group of local residents and Parish Councillors. Please see **Appendix A** – Holbrook Neighbourhood Plan Working Group Members. The stages in the preparation of this Neighbourhood Plan are set out below in **Figure 1**.

2 PRELIMINARIES

- 2.1 References are made to various web sites and sources of information throughout the Neighbourhood Plan. All such references are shown in square brackets, e.g. [4], and are listed at the end of the document. Documents that have been generated by the neighbourhood plan group or any document that has been commissioned by the group are referred to as supporting documents. All supporting documents are available on the neighbourhood plan section of the Holbrook Parish Council website. <https://holbrook.suffolk.cloud/neighbourhood-plan/>
- 2.2 Policies are prefixed by "HNP" to denote specific Holbrook Neighbourhood Plan Policies. Policies are shown in Section 10.
- 2.3 Community aspirations are prefixed by "HNC" to denote specific Holbrook Neighbourhood Plan Community Aspirations. Community aspirations are shown in Section 11.
- 2.4 Objectives are prefixed by "Objective", e.g., Objective 01.

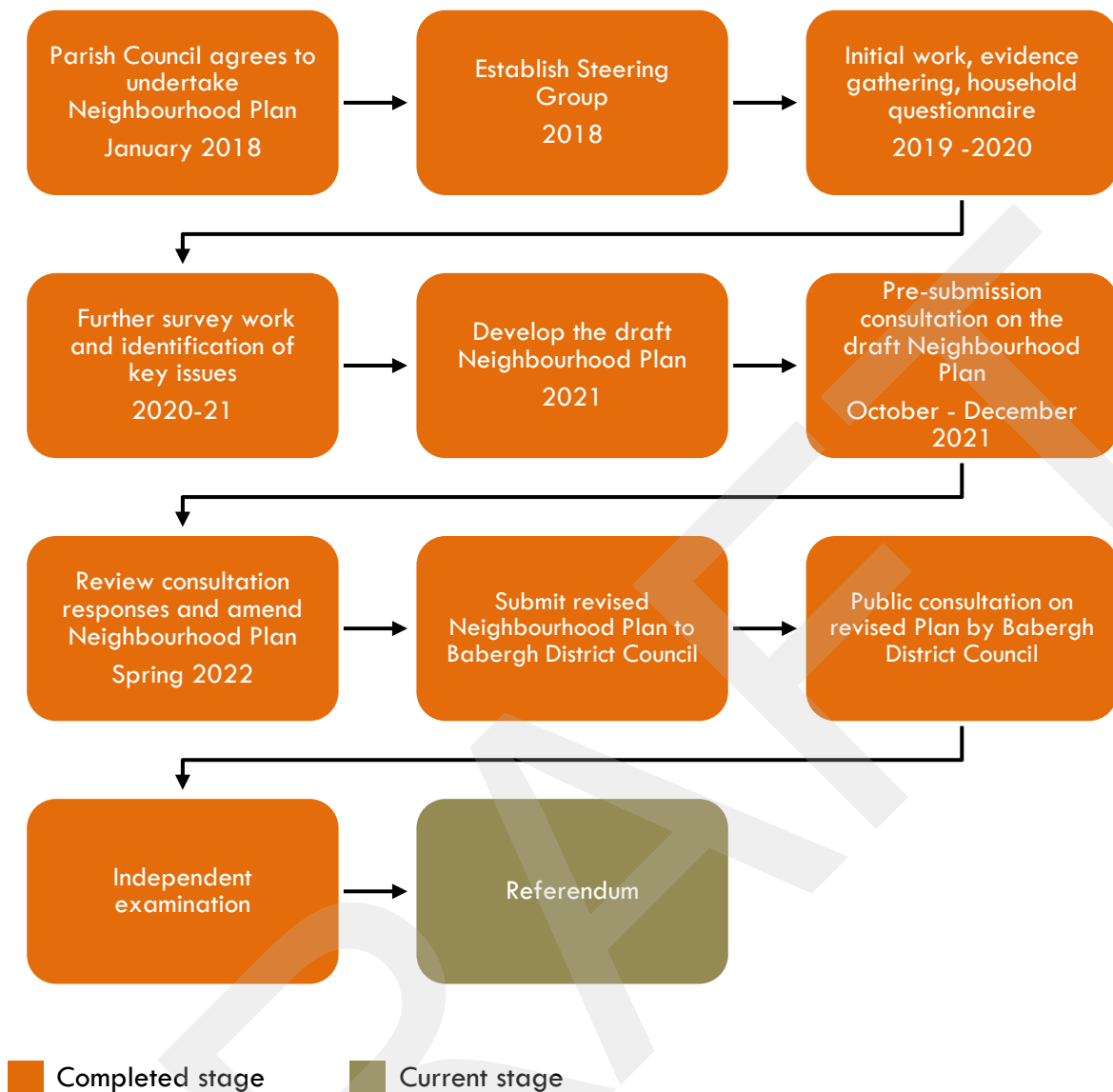


Figure 1: Neighbourhood Plan Process

3 INTRODUCTION: NATIONAL AND LOCAL PLANNING CONTEXT

- 3.1 This is the Neighbourhood Plan for Holbrook Parish. It represents the development plan for the Parish over the period from its approval date to 2037.
- 3.2 The regulations governing the preparation of Neighbourhood Plans require that they take account of the National Planning Policy Framework (NPPF) and are in general conformity with the strategic policies of the local development plan.
- 3.3 The Holbrook Neighbourhood Plan has been prepared with regard to the National Planning Policy Framework (NPPF) [1] as well as guidance set out in the National Planning Practice Guidance (PPG). Due regard has also been given to both adopted and emerging planning policy at the district level.

- 3.4 The current development plan for Babergh comprises the Core Strategy adopted in 2014 and the saved policies of the 2006 Babergh Local Plan [3]. Since 2015, Babergh District Council have been working jointly with Mid Suffolk District Council on the Babergh and Mid Suffolk Joint Local Plan (JLP) which will replace the existing Core Strategies and Local Plans for both Districts. The Pre-Submission Regulation 19 Version of the Joint Local Plan was submitted to the Secretary of State for Examination on 31st March 2021. The Examination began on 21st June 2021 and hearings were held in July, September, and November 2021. The outcome of those hearings being that the emerging BMSJLP is split into two parts. Part 1 contains all strategic and development management policies aside from the spatial distribution, site allocations and open spaces, which will be covered in Part 2. Post examination modifications to Part 1 of the Local Plan were published for consultation in March 2023. Part 2 is expected to be completed in 2025. The Housing requirement numbers contained in the Regulation 19 version of the BMSJLP are therefore to be taken as the indicative numbers for the purposes of Neighbourhood Plans until Part of the Local Plan is adopted.
- 3.5 Although the emerging JLP has not yet been formally adopted, the National Planning Practice Guidance (PPG) advises that the reasoning and evidence informing the new Joint Local Plan process may be relevant to the consideration of the basic conditions against which the Neighbourhood Plan is tested.
- 3.6 This Neighbourhood Plan has been prepared to help to achieve sustainable development for the Parish of Holbrook. It will run from the approval date until 2037, to coincide with the end date of the new Babergh Mid Suffolk Joint Local Plan.
- 3.7 The emerging JLP identified two settlement boundaries within the parish, the main part of Holbrook is defined as a Core Village and the area around Harkstead Road (Lower Holbrook) as a hamlet village. The description of the parish is as follows:

“Holbrook (Core Village): located on the Shotley Peninsula, approximately 8km south of Ipswich, Holbrook is classified as a Core Village. Lower Holbrook is classified separately as a Hamlet Village. To the north of the settlement, the landscape is classified as ancient Estate Claylands. The majority of the landscape to the south of the settlement is classified as Rolling Estate Farmlands, with smaller sections of Valley Meadowlands and Plateau Estate Farmlands. There are few Grade II listed buildings within the core of the settlement, with the Grade II* Church of All Saints located on the southern edge of the settlement. To the east of the settlement lies the extensive post-medieval landscape of Holbrook Gardens, and to the south lies a historic mill complex and Grade II* listed Royal Hospital School and Grade II associated buildings. The Royal Hospital School plays an important role in the local economy and offers an educational role to a large catchment area. The Suffolk Coast and Heaths AONB borders the settlement to the south.

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

- 3.8 The emerging Local Plan also identified a minimum housing requirement for the parish of 65 new dwellings over the Plan period to 2037. This housing requirement is already met as it primarily comprises sites that have the benefit of planning permission and were not implemented at 1 April 2018 (58 dwellings) and those granted permission since then and the completion of the preparation of the Neighbourhood Plan. This gives a total of 69 dwellings. Therefore, the Parish is not compelled to make further allocations to meet this target prior to 2037, although it is recognised that there may be applications for windfall and infill development that will come forward during the Plan period.
- 3.9 Neighbourhood Plans however may provide for development above the identified minimum housing requirement should they so wish, and the Parish does recognise that this is a minimum target and that there may be some opportunities to develop small infill sites within the Settlement Boundary in order to ensure that Holbrook remains a vibrant and sustainable community. In addition, the Neighbourhood Plan identifies important environmental assets such as important views, green spaces and heritage features that should be enhanced and protected for future generations to enjoy. For the purposes of the Holbrook Neighbourhood Plan policies, it is intended to use the Settlement Boundaries for Holbrook and Lower Holbrook as identified in the Pre-Submission Version of the JLP (November 2020).
- 3.10 Furthermore, the area of the Shotley Peninsula, is covered by a number of environmental designations, such as the Area of Outstanding Natural Beauty (AONB), and its Additional Project Area, a Special Protection Area, and a Site of Special Scientific Interest (SSSI).
- 3.11 Holbrook lies close to the Stour Estuary, part of the internationally important Stour & Orwell Estuaries Ramsar site and therefore lies within the Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) 13km Zone of Influence. The intention of this zone 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 and Neighbourhood Plans.
- 3.12 The Neighbourhood Plan recognises that Holbrook as a core village provides a Secondary Education Facility, and the Holbrook branch of the Holbrook and Shotley Health Practice is used by a number of Parishes on the peninsula. Planned developments in other Parishes will also influence the need for these facilities to expand.

Background to the Holbrook Neighbourhood Plan

- 3.13 In January 2018 Holbrook Parish Council held a public meeting which was attended by approximately 150 people. During the meeting, the Parish Council established a working group comprising a number of local people to create a Neighbourhood Plan for the village.
- 3.14 The Parish Council applied to Babergh District Council, to designate the Neighbourhood Area on 27th March 2018. The District Council publicised the application and consulted on this between March and April 2018. Under the Neighbourhood Planning (General) Regulations 2012 (as amended), the District Council confirmed the designated Neighbourhood Plan Area on 6th April 2018. A notice to this effect was published on the Babergh website.
- 3.15 The Plan Area is the Holbrook Parish boundary as indicated by the green border shown in Figure 2: Holbrook Neighbourhood Plan Area.
- 3.16 Holbrook Parish Council confirms that this is the only Neighbourhood Plan for the Parish of Holbrook.
- 3.17 The principal objective of the Neighbourhood Plan is to provide for the sustainable development of the village through the achievement of a better-balanced community. Historically the trend towards an increasingly ageing population has accelerated and continues to do so. It is considered desirable to increase the proportion of young people living within the village by ensuring that any future developments put the emphasis on affordable, smaller homes, capable of meeting well established local needs. This should also enable older residents, who wish to downsize, to stay within the Parish.
- 3.18 The Neighbourhood Plan contains planning policies and proposals that relate to the use of land. In addition, it contains proposed community aspirations that, although not forming part of the statutory Neighbourhood Plan, provide additional locally identified projects for improvements across the Parish of Holbrook to be pursued by the Parish Council.

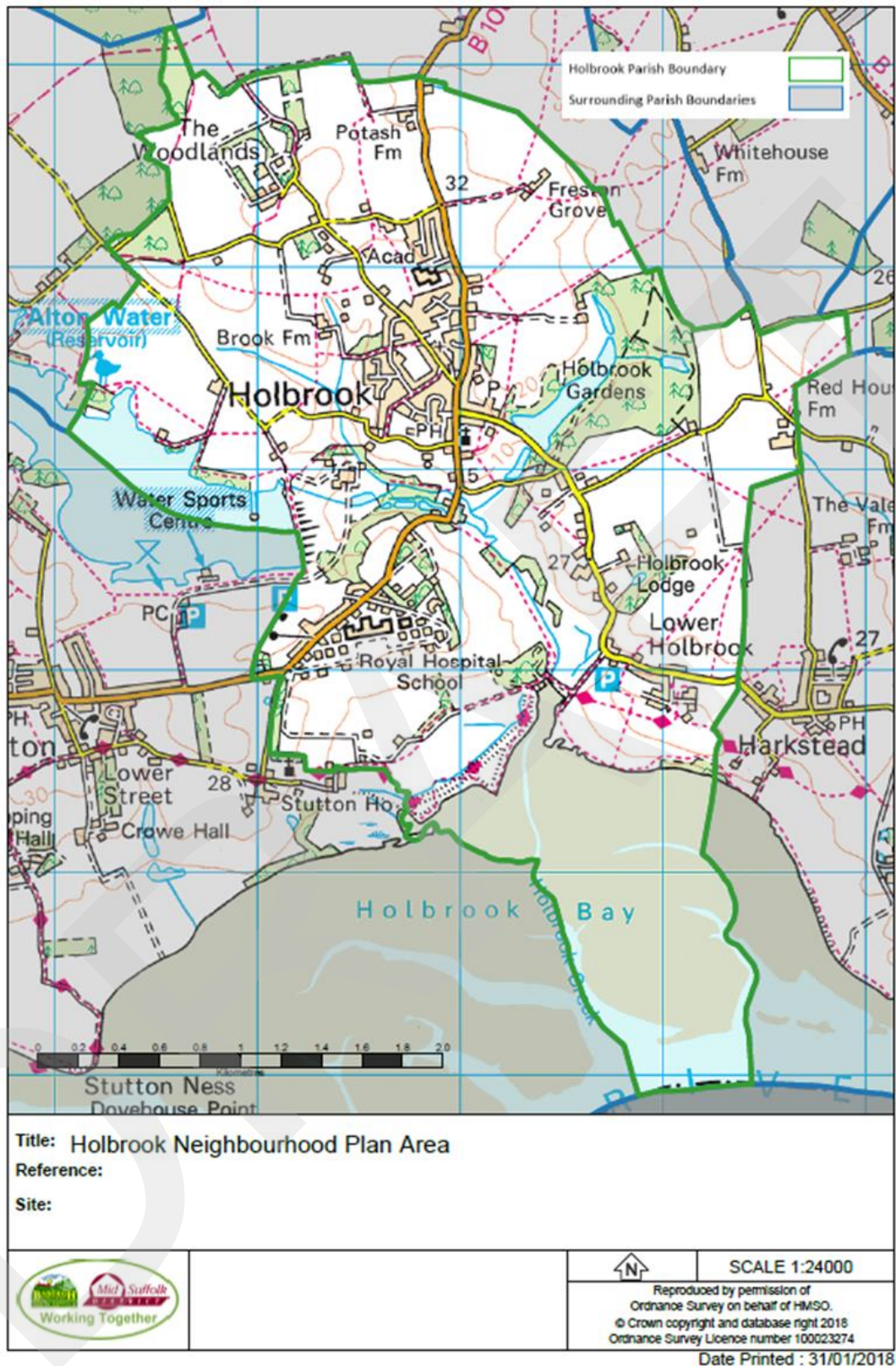


Figure 2: Holbrook Neighbourhood Plan Area

4 ACHIEVING SUSTAINABLE DEVELOPMENT

NPPF

- 4.1 The National Planning Policy Framework 2021 states that: “The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.” There are currently a number of government initiatives proposed which may contradict certain elements of this plan, should this be the case it behoves the Parish council to identify this at the planning assessment stage, as should any further initiatives.
- 4.2 The National Planning Policy Framework (NPPF) notes that there are three elements to sustainable development; economic, social, and environmental, and as such the planning system (of which this Neighbourhood Plan will be part), needs to perform three roles:
- The economic objective: to help build a strong, responsive, and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
 - A social objective: to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful, and safe places with accessible local services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
 - An environmental objective: to protect and enhance our natural, built, and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.

5 HOLBROOK TODAY

- 5.1 The Parish of Holbrook is situated on the Shotley peninsula which lies between the Orwell and Stour Rivers, approximately 8km south of Ipswich. The area is a Ramsar site with salt marshes and intertidal mudflats, and provides a winter-feeding area for estuary birds, wild fowl, and waders. The Peninsula is situated within the Suffolk Coasts and Heaths Area of Outstanding Natural Beauty (AONB) and Additional Project Area, and has parts designated as a Site of Special Scientific Interest (SSSI) and Special Protection Areas (SPA). The Alton Water reservoir, between Holbrook and Stutton, has many outdoor pursuits on offer, such as fishing, sailing and a popular cycle route. To the north of the area, the rural landscape is classified as Ancient Estate Claylands. To the south, the landscape is classified as Rolling Estate Farmlands, Valley Meadowlands and Plateau Estate Farmlands.



**Figure 3: Aerial view of Holbrook with Alton water in the background
(Photo: Luke Macaulay)**

- 5.2 Holbrook itself is a self-contained village with a number of services and facilities including a fire station, GP surgery, primary and secondary schools, two shops, sports centre, two pubs and two churches. Lower Holbrook is a hamlet within the plan area, with a smaller population with no facilities except a car park.
- 5.3 Holbrook has a primary school with capacity to meet the needs of current planning commitments. However, additional pre-school provision will be required together with an extension to Holbrook Academy to meet planning commitments. The Royal Hospital School, to the south-east of Holbrook, provides fee-paying education for day pupils and boarding pupils aged 11-18. There are a total of 800 pupils attending the school. There are 300 members of staff, the majority of whom live on site.

- 5.4 The main routes out of the village are country roads heading north under the Orwell Bridge (B1456) and west to Brantham, via Stutton (B1080). Shotley Gate is south-east of Holbrook, via Freston Water Tower junction (B1456). The development of substantial new housing developments on the Peninsula, such as the Ganges site in Shotley Gate, will increase traffic flows along the B1456 and the major junction at Four Cross Ways at the Freston junction. Experience of inclement weather causing continued flooding along the B1080, and flooding of alternative unclassified local roads has, in the past, left Holbrook cut off. Combine this with High wind events over the Orwell Bridge which causes grid lock on all major routes the need for an overall holistic policy is imperative.
- 5.5 The continued failures of the water mains system have highlighted the past failures to maintain and update major services serving the villages on the Peninsula.
- 5.6 The Suffolk Observatory [24] estimate the population of the Parish to be 2,274 in 2015 for the Holbrook Ward, which includes Harkstead:
<https://www.suffolkobservatory.info/wp-content/uploads/2017/09/06-Peninsula.pdf>

Landscape and natural habitat

- 5.7 The following extracts are taken from the Alison Farmer Associates Valued Landscape Assessment of the Suffolk Coasts and Heaths Additional Project Area of the Shotley Peninsula on behalf of the SC&H AONB which was published in March 2020 [7]:

Location and Topographic Context

- 5.7.1 Holbrook is closely associated with Holbrook Stream tributary valley to the Stour Estuary. Set back from the northern shores of the estuary, the village sits on the upper northern slopes of the valley with land sloping away to the west, south and east. The majority of the settlement sits above the 25m contour but below the 30m contour. To the south of the valley, sits the Royal Hospital School which has a distinct and separate character to the main village. To the south and west of the village is the AONB, Figure 4

Landscape Setting

- 5.7.2 “The settlement sits on the higher land above the Holbrook Stream valley, on the Ancient Estate Farmlands, which extend across the Shotley Peninsula. Above the 30m contour the Ancient Estate Farmlands become open, comprising a flatter plateau. Below this, landform is gently sloping becoming steep around the 20m contour and dropping into the valley. The steeper slopes of the river valley comprise Rolling Estate Farmlands with Valley Meadowlands along the distinctive narrow valley floor.
- 5.7.3 The majority of the enclosure pattern surrounding the settlement consists of 18th century or later enclosures from former common arable or heathland. On the steeper slopes to the south of the village the enclosure pattern is smaller reflecting random fields which are pre 18th century. Land to the west of the village has historically formed part of the Dodnash Special Landscape Area and the southern fringes of the village, where the land drops into the valley, form part of the Suffolk Coast and Heaths AONB.

Village Form and Character

- 5.7.4 The form of Holbrook reflects its historical development along the main routes which extended to the stream crossing to the south. The core is located along The Street where there is a higher concentration of older buildings and cottages. The older parts of the village have a treed character which contrasts with the more recent housing estates.” (AFA, 2020, p35 [7])

Coastal Scene

- 5.8 According to the Stour and Orwell Society: At the shore along the River Stour, “characteristic patterns of remnant structures on the foreshore add visual interest including wooded stumps associated with former sea walls, remains of Anglo-Saxon fish traps at Holbrook Creek and a shipwreck on Wrabness Beach. The Essex Way and Stour and Orwell Walk long distance footpaths extend along the southern and northern shores respectively which attract visitors to the area in the summer months.
- 5.9 Where the Parish of Holbrook meets the River Stour, it is designated as a Special Protection Area which is protected under the Conservation of Habitats and Species Regulations 2017 (as amended).

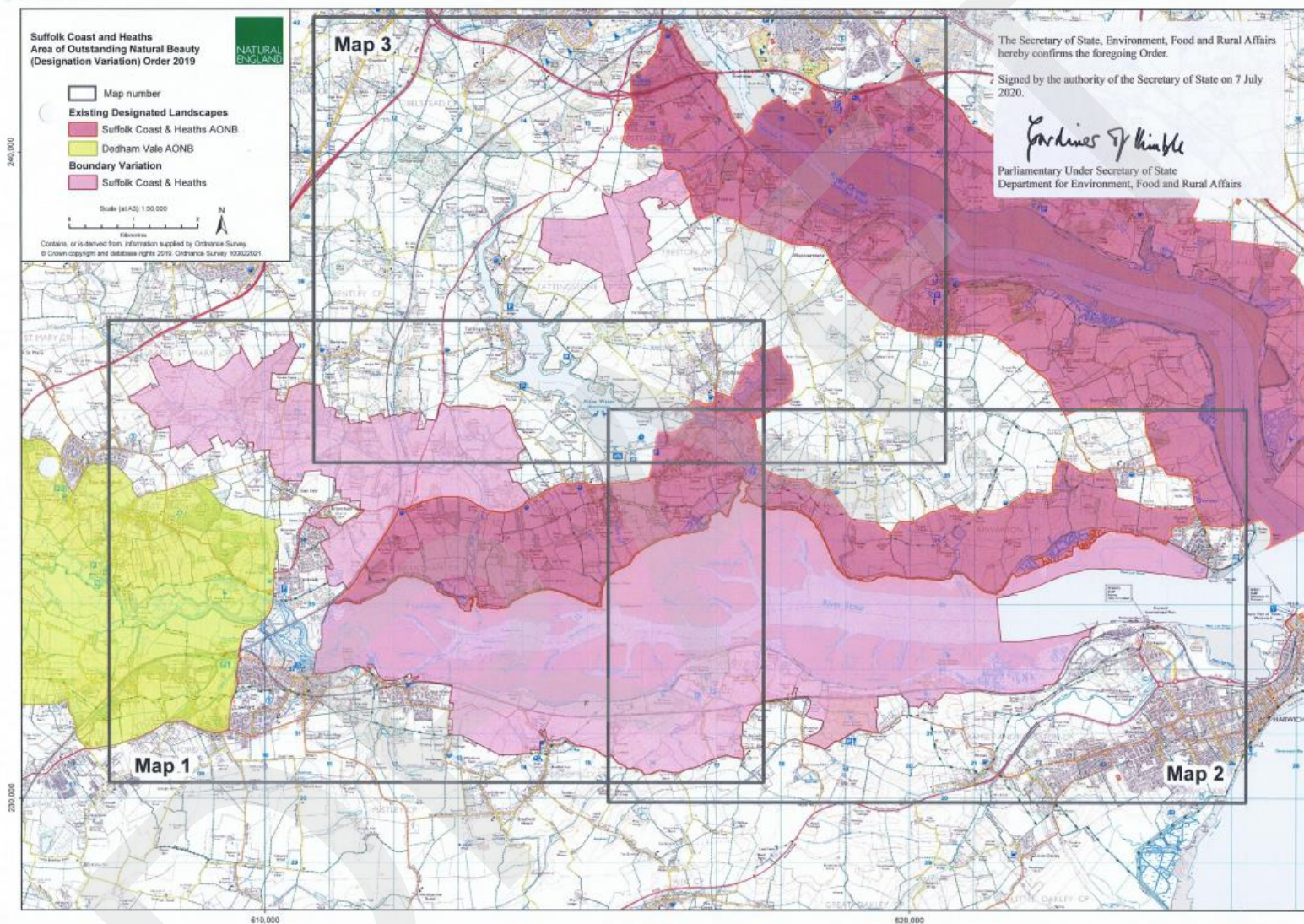


Figure 4: Existing and newly adopted AONB area surrounding Holbrook



Figure 5a and 5b Landscape and Coastal Scenes



Figure 6: view from the River Stour looking North Northwest



Figure 7: Royal Hospital School

- 5.10 The Royal Hospital School is an independent co-educational boarding and day school. Originally founded in Greenwich, London, in 1712, the school moved to its current 200-acre site overlooking the River Stour, Suffolk, in 1933. The site is located between the villages of Holbrook and Stutton, 8.5km south of Ipswich and within the Holbrook plan area. The buildings are Grade II/II* listed and were designed by the Birmingham based Arts & Crafts architect Herbert Tudor Buckland. The original purpose of the school was to provide education to the orphans of seafarers in the Royal and Merchant Navies. The school occupies a prominent position on the Shotley Peninsula facing the River Stour, located on the rising ground of the valley side of the River Stour, near Alton Water.
- 5.11 The school site is set within the wider land holding of the Greenwich Hospital Holbrook Estate. The Holbrook Estate was originally 850 acres but has reduced in size and now extends to about 500 acres which comprises, in addition to the 200 acres of RHS site, agricultural land, farmhouses, cottages and other miscellaneous properties including a playing field and reed beds. They own the Reade Field in Holbrook which they lease to the village at a peppercorn rent.
- 5.12 The school site comprises a mixture of teaching facilities, staff accommodation, service buildings, as well as sports facilities and considerable playing fields. Teaching buildings form a formal linear complex running from east to west with boarding houses arranged in blocks to the south.
- 5.13 The most prominent feature of the school is the clock tower which stands 63m (208 feet) high and is visible from well beyond the site boundary. Another prominent feature is the water tower which sits adjacent to grounds maintenance buildings and service yard.
- 5.14 A strip of mature woodland with TPO status runs along the western edge of the site adjacent to the school's 9-hole golf course. The open playing fields in the south of the site slope down towards arable land and saltmarsh on the bank of the River Stour. In the north-eastern corner, a portion of dense woodland screens functional service buildings from the road.

Alton Water

- 5.15 To the west of Holbrook is the Alton Water reservoir, set in more than 400 acres of grassland and woods. This is the biggest reservoir in Suffolk, and it is home to many freshwater birds, as well as providing a haven for small land animals such as rabbits and squirrels. It is a major centre for birdwatching, walking, sailing, and cycling.

- 5.16 According to AF Associates (2020) [7]: “Alton Water is valued for its nature conservation and is designated a County Wildlife Site for its mosaic of habitats and supports a wide variety of birdlife. Alton Water is marketed for outdoor recreation including fishing, quiet water sports, cycling and walking and various small parking areas and a visitor centre/facility. There is a popular 13km circular recreation path around the reservoir and connections to a wider network of public rights of way. The narrow lanes which traverse this landscape also provide opportunities for open air recreation and the South Suffolk cycle route B runs through the area. Alton Water is valued for its birds and offering breeding bird habitat for species such as Common Tern in summer and as a refuge/roost for wildfowl during winter months. The open water of the reservoir and bird life it attracts makes a significant contribution to tranquillity.”
- 5.17 Alton Water also provides employment opportunities via the water sports centre, camping/caravan site, play area, cycle hire and café. In more recent years, the site has been taken over entirely by Anglian Water, with major renovations taking place to enhance the entire site. Only a small section of the Alton Water site lies within the Parish of Holbrook.



Figure 8: Aerial view of Alton Water (Photo credit Luke Macaulay)

History of Holbrook and Lower Holbrook

- 5.18 The origins of the name Holbrook date from when the Anglo-Saxon tribes ruled over Britain. The name was originally derived from the name of a family which lived in the area. The surname Holbrook originally referred to a “sunken stream,” “hollow brook” or “brook in a hollow” from the Old English words “hol” + “broc”. Holbrook is also an ancient surname in the east of England.

- 5.19 Early mentions of the surname Holbrook are first found in Suffolk at Holbrook, a Parish, in the incorporation and hundred of Samford and at Holbrook in Derbyshire, a chapelry, in the Parish of Duffield. Both locations are listed in the Domesday Book of 1086 as Holebroc. The Hundredorum Rolls of 1273 include some of the first entries for the family Richard de Holebrokke of Suffolk.
- 5.20 To the north of the settlement of Holbrook, there is a Scheduled Ancient Monument formed by a Neolithic enclosure which pre-dates the Saxons by thousands of years. It is the earliest known monument in this area and shows significant evidence of subsequent use of the area from the later prehistoric and Roman periods onwards. There are enclosures, trackways, pits, and a sequence of field boundaries and ditches indicating settlements and land use over a long period of time. A hoard of Roman coins was found in the field as shown in Figure 9 below.



Figure 9: Hoard of Roman coins found in local field

- 5.21 Lower Holbrook is a hamlet to the south-east of Holbrook. The history of Lower Holbrook is based extensively on the Bay and the Creek foreshore. Archaeological finds indicate that the area of Holton or Lower Holbrook was also inhabited by Stone Age people and the remains of ancient fish traps indicate that occupation carried on through the Saxon period. Holbrook and Lower Holbrook have had distinct and separate development due to their locations, both in recent and ancient times, although now they have similar needs and concerns. In the past, the inhabitants of Holbrook were chiefly employed in agriculture. The sandy loam soil, together with the local microclimate means that some areas of the peninsula are suitable for viticulture.

- 5.22 The origins of Lower Holbrook have been obscured, due to the coming of the Black Death in 1349 which decimated the population, slowing down expansion and development. The Black Death caused the demise of many small settlements. The River Stour which had provided sustenance and work became a conduit for disease and infection. Mark Bailey's book *Medieval Suffolk* noted the Stour Valley was a major and early route for the Black Death.
- 5.23 Having survived the Great Famine of 1315-22 and the pestilence of the Black Death, there now began the great unrest culminating in the Peasants' Revolt in 1381 with the Lords wanting to establish the old status quo, whilst the scarce workers – the survivors – demanded freedom from servitude. Due to an enlightened lord at Holbrook, who waived 'laboured service,' Holbrook's peasants fared much better than those 'lower down the hill' under the manors of Berners of Woolverstone and Harkstead.
- 5.24 Yet history tells us that by 1500 Suffolk had become one of the richest and most 'industrialised' regions of England based on manufacturing, fishing, and tanning. Whilst Holbrook itself had a number of properties dating back to the 16th, 17th, and 18th centuries, few have survived. Holbrook House was demolished to build RHS. Holbrook Mill circa 1600, owned by a Mr Cornwell, survives in partial form. No such early survivals exist in Lower Holbrook apart from a number of cottages which have been listed dating back to the 16th/17th century. The Joseph Hodkinson Map of Suffolk 1783 surveyed just before the parliamentary Enclosure Act, which irrevocably changed the rural landscape, denotes the area as Holton Green and it was so named in White's 1858 census directory.
- 5.25 From a rural backwater, Lower Holbrook 'industrialised' using the wharfage along the Stour with brick manufacturing, coal imports and the transiting of fodder for the capital's horses. During the period 1800-1850 the expansion of Ipswich trebled its population and doubled again at the end of the century thus encouraging more commerce for the whole of the Peninsula.
- 5.26 Samuel Lewis wrote in *A Topographical Dictionary of England* 1848:
- "Holbrook, a village, and a Parish in the hundred of Samford, county of Suffolk. The village stands 1½ mile N of Holbrook Bay, 3½ miles ESE from Bentley Junction station on the G.E.R., and 5½ miles S by E from Ipswich, and has a post, money order, and telegraph office under Ipswich. The Parish comprises 2054 acres; population, 774. The manor belonged formerly to the Clenches and belongs now to the Berners family. Holbrook House is the seat of the Reade family. Holbrook Bay is an expansion of the estuary of the Stour, opposite Wrabness in Essex."
- 5.27 Around the mid-1800s the 'roads' on the peninsula were no more than mud tracks. It was reported that carters would struggle to summit the climb from Ipswich with mud up to the axles.
- 5.28 The Anglican Church, dedicated to All Saints, is an ancient structure with a square tower. All Saints was restored and enlarged in the Victorian era. There is also a Methodist church, in the centre of the village, which was built in 1829 and refurbished in 2009.

- 5.29 “The area’s light, generally less impoverished soils, were historically considered to be the best in Suffolk and have had a significant impact of the landscape. These first farms and settlements were established on these soils, evidenced by the 5,000-year-old Neolithic ritual enclosure at Freston.” (AFA 2020) [7]

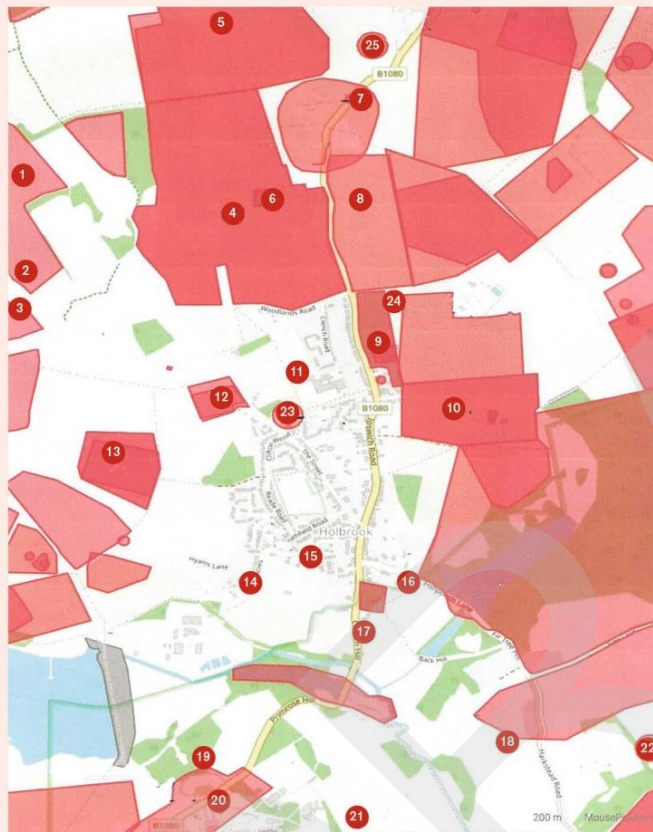
Heritage and Archaeology

- 5.30 According to findings from the Alison Farmer Associates Valued Landscape Assessment (March 2020) [7]: “Originally the settlement of Holbrook comprised a hall (Holbrook Hall – demolished in 1928) and church complex centred around Holbrook Stream valley and a dispersed pattern of rural cottages and farms along the main routes north of the valley. However, over the centuries infill development has created a pattern of linear development along the main roads.
- 5.31 The parkland landscape to the east, at Holbrook Gardens, is an extensive post-medieval landscape which contains lakes, fishponds, and extensive tree cover on the valley slopes. Maps from the 19th century show that the valley sides were used to create extensive areas of designed garden (Holbrook Gardens) associated with Park House on the eastern side the village and a separate area of parkland associated with Holbrook House on the southern valley slopes. There was also an area of parkland in the triangular area between Ipswich Road and The Street, associated with the Rectory (now within the main body of the settlement).
- 5.32 In the first half of the 20th century a new road connection between The Street and Hyams Lane (Heathfield Road) was created, and new housing developed along the route. Infill housing was constructed along Church Hill and also to the north of the main village along Ipswich Road onto the higher flatter farmland. By the latter half of the 20th century new estate housing was constructed off Heathfield Road to the north and south and a further link road established between Heathfield Road and The Street. In the early 21st Century further housing development has established in the north of the village, off Ipswich Road (Abbot Way, Rodwell Close and Wagstaff Close).” (AFA 2020 p35)
- 5.33 As can be observed on the Archaeology Map of the Shotley Peninsula, the Parish is bounded on all sides by archaeological finds from actual artefacts to distinct signs of previous habitation and usage, primarily farming, dating back 4000 years, from the Stone / Bronze age through to late Roman and early Saxon / Norman periods until the present day.
- 5.34 The early occupation was probably Stone / Bronze age subsistence farming by sparsely scattered family groups and is further evidence of occupation by the flint ‘mines’ at Grimes Graves north of Ipswich.
- 5.35 The probable attraction of Holbrook was, as in latter occupation episodes, the coastal and river systems which it is known were ‘routes’ favoured by the early inhabitants who favoured ‘high’ ground as adopted throughout the land exemplified by Hill Forts and the like.

- 5.36 The period of concerted occupation came around the 7th Century with the evolving of a Middle Anglo Saxon town of Gipeswic (Ipswich) which developed an economy based on craft production (pottery) and international trade utilizing the river system giving access to the sea and the continent, now the countries of Germany, France, and Belgium.
- 5.37 The importance of trade has been evidenced in the locality with archaeological finds of wool, woven textiles, leather/ antler / bone / metal working with imported goods such as wine, pottery, and timber from as far as Germany.
- 5.38 Ipswich (Gipeswic) served East Anglia and Mercia and became one of England's earliest towns along with York (Eoforwic), Southampton (Hamwic) and London (Laundenwic) but only Gipeswic remains on its original site with unbroken occupation until present day.
- 5.39 The Normans followed the Saxons, but the fortunes of the locality declined during the 11th & 12th centuries due to the Earl of East Anglia's (Ralph de Guader) rebelling against William the Conqueror's rule.
- 5.40 How long it took the area to recover from the damage done by the succession of Vikings, then Normans is unknown but its location as a port internationally and regionally likely helped it to recover. Prior to the Norman Conquest, Ipswich had an estimated population of 3000 inhabitants but few were recorded as being in agriculture; most were likely in some form of trade. The Norman overlords-initiated redevelopments as seen in Norwich and Colchester and the area began a slow climb out of recession mainly based on agriculture.
- 5.41 The village of Holbrook has been witness to millennia of settlement from the Stone Age, Bronze Age through to Roman occupation through to the Vikings and Norman invasion and occupation/settlement and hence the archaeology is sparse and varied providing a window on its heritage.

MAP OF HOLBROOK ARCHAEOLOGY

Information taken from heritage.suffolk.gov.uk/map



ITEM 1
Cropmarks of field boundaries (HBK 055) no name (HBK 008) Single Bronze-Age ring ditch, not completely circular. (HBK 008)

ITEM 2
Cropmarks of field boundaries (HBK 055) Ring ditch of unknown date, visible as a cropmark, one of a group of 5 or 6. (HBK 041)

ITEM 3
Cropmarks of field boundaries (HBK 057) Cropmarks of six ring ditches (HBK 051)

ITEM 4
Cropmarks of extensive field systems (FRT 006) Find spot of a Roman coin hoard, mid C4 (FRT 001) W of Potash Farm (FRT 006)

ITEM 5
Cropmarks of a curvilinear enclosure (FRT 028) Cropmarks of field boundaries, a rectilinear enclosure, and possible trackway (FRT 020) Field system, boundaries and ditches, unknown date (FRT 020) Irregular shaped enclosure making up part of the field system, unknown date (FRT 028)

ITEM 6
Cropmarks of a square enclosure (FRT 029) Cropmarks of extensive field systems (FRT 006) Rectangular enclosure, unknown date (FRT 029) west of Potash Farm (FRT 006)

ITEM 7
Interrupted Ditch System / Causewayed Enclosure at Potash Farm (FRT 005) which is a Scheduled Ancient Monument SF183; Interrupted Ditch System At Potash Farm Long narrow rectangular building within Causewayed Enclosure at Potash Farm (FRT 023) A possible Neolithic long house or Anglo-Saxon hall is visible on aerial photographs inside the causewayed enclosure to the north of Potash Farm, Freston.

ITEM 8
Sparse 18th–19th century artefacts scatter (FRT 060)

ITEM 9
Later prehistoric field system at Ipswich Road (HBK 064)

ITEM 10
Bronze Age ring ditch (FRT 012) Cropmarks of a rectilinear enclosure or field system, several field boundaries, trackways and enclosure (FRT 011) Cropmarks of a ring ditch (FRT 012) Rectilinear field system including rectangular field with central longitudinal division, unknown date (FRT 011)

ITEM 11
Find spot of a large circular flint scraper, (Neolithic?). (HBK 065)

ITEM 12
Cropmarks of a curvilinear enclosure (HBK 006) Curvilinear field boundary with several lengths of ditch, suggesting parts of 2 narrow rectangular fields, of unknown date. (HBK 006)

ITEM 13
Cropmarks of an incomplete sub-rectangular enclosure (HBK 005) Remains of a sub-rectangular enclosure of unknown date. (HBK 005) Small square enclosure of unknown date with entrance on the north side. (HBK 010)

ITEM 14
Find spot of Edward IV sterling penny (HBK 063)

ITEM 15
Spear tip, bronze, length 9.5cm. "Tip missing". Dug up circa 30cm down in garden. Item 16 18th century extraction pits at The Yellow House (HBK 046)

ITEM 17
Find spot of a Medieval small handled vessel (HBK 068)

ITEM 18
Venetian soldino fragment of 16th century date (HBK 059)

ITEM 19
Unidentified Iron Age object, Holbrook Naval School (HBK 067)

ITEM 20
Medieval artefact scatter of pottery, including 2 sherds of sagging bases (HBK 069) Royal Hospital School (HBK 027)

ITEM 21
Two stretches of possible trackway of unknown date, visible as cropmarks. (HBK 035)

ITEM 22
Lower Holbrook (HBK 012) Late C15 jewellery and coin hoard from Lower Holbrook.

ITEM 23
Holbrook C P School (HBK 019) Flint barbed and tanged arrowhead.

ITEM 24
Grove Farm (HBK 001) Faceted socketed bronze axe found in field.

ITEM 25
Turkey Farm (FRT 002) Earthenware 'water bottle'.

Figure 10: Holbrook Archaeology Map

6 EVIDENCE BASE

Timeline

6.1 The evolution of the Neighbourhood Plan to date:

- March 2018. Holbrook Neighbourhood Plan Working Group established at Parish Council Meeting
- 6th April 2018. The Holbrook Neighbourhood Plan Area is designated by BMSDC
- July 2018. Neighbourhood Plan Working Group stall at the Holbrook Village Fete
- Feb 2019. Youth Focus Group at Holbrook Academy
- 23 Feb 2019. Public Consultation Event at Holbrook Village Hall. Parish Survey Questionnaire launched.
- May 2019. Call for Sites launched. Leaflets distributed to every household.
- August 2019. AECOM commence work on the Housing Needs Assessment.
- October 2019. AECOM commence work on the Site Options Assessments
- December 2019. Reports received from AECOM
- January 2020. Working Group commence first draft of Neighbourhood Plan
- March 2020. Publication of the Valued Landscape Assessment of the Shotley Peninsula by Alison Farmer Associates
- April 2021. Consultant appointed
- Regulation 14 Pre-submission consultation undertaken by Holbrook Parish Council between October and December 2021
- Review of Regulation 14 comments, January – August 2022
- October 2022. Submission of the Neighbourhood Plan to Babergh District Council
- Regulation 16 Submission consultation undertaken between November 2022 and January 2023
- Independent Examination, February 2023

Public Consultation Events

- 6.2 Throughout the duration of the development of the plan a number of consultation events and activities were organised by the Holbrook Neighbourhood Plan Working Group to gather the views of the community and to share the findings.

- 6.3 In July 2018, the Holbrook Neighbourhood Plan working group was represented at the Holbrook Village fete. There was a stand with display posters informing the local community about what a neighbourhood plan is all about along with maps to denote the area of the Parish. Significant interest was shown by the local people who attended the fete. Leaflets were available and people were encouraged to sign up for updates and to get involved in the working group [25].
- 6.4 Regular articles informing the local community about consultation events and updates to progress have been placed in the Holbrook Parish Papers and In Touch Magazine which is distributed to all households in the Parish [25].
- 6.5 Full details of the consultation events and the communication methods used to develop the Neighbourhood Plan are included in the Consultation Statement that accompanies this submission version of the Holbrook Neighbourhood Plan.

Call for Sites

- 6.6 In March 2019, the HNP working group hand delivered leaflets to every household in the Parish to advertise a “Call for Sites” for the Neighbourhood Planning process [25]. Ten responses were received by the Parish Council Clerk.
- 6.7 In October 2019, the HNP commissioned AECOM to conduct an independent assessment of the sites put forward by the local landowners.
- 6.8 It was agreed with AECOM that the site assessment report would 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 working group to make decisions about Neighbourhood Plan policies.
- 6.9 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 (Nov 2020) required Neighbourhood Plans to plan to deliver the housing requirements set for each NPA. The policy states that Holbrook has a requirement of 65 dwellings.
- 6.10 At the start of the neighbourhood planning process the HPC expected the need to allocate sites for housing to meet identified development needs.
- 6.11 Given that the housing requirement has already been met through recently completed development, sites with planning permission and a proposed allocation for 7 dwellings in the JLP, there is no requirement to allocate additional sites in the Neighbourhood Plan for housing. However, it was felt to be important to ensure that all options were explored.

- 6.12 Eight sites were identified in total for the site assessment. This included seven sites identified in the Neighbourhood Plan Call for Sites and one site from the District Council Call for Sites. Three of the sites submitted through the Neighbourhood Plan sites had already been submitted to the BMSDC Strategic Housing and Land Availability Assessment (SHELAA). All sites are available as they have all either been submitted to a Local Authority or neighbourhood level Call for Sites. One site in Holbrook (SS0717) was included with a revised site boundary in the 2019 SHELAA and this already has planning permission, therefore was not included in the assessment.
- 6.13 One site within the NPA was found to be potentially suitable and available for allocation. This was not for housing development but instead 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.
- 6.14 All other sites were rated red by AECOM and therefore deemed unsuitable for residential housing development.
- 6.15 See the full report on the Holbrook Parish Council web site:
<https://holbrook.suffolk.cloud/neighbourhood-plan/> [4].

Site Assessment

- 6.16 Following our call for sites [25] eight sites were considered as possible candidates for future development in the Parish of Holbrook.
- 6.17 The site assessment performed by AECOM [4] found that of the eight sites considered, only one site is suitable and available for educational uses. The remaining seven sites are not suitable for residential development and therefore not appropriate for allocation in the Neighbourhood Plan.

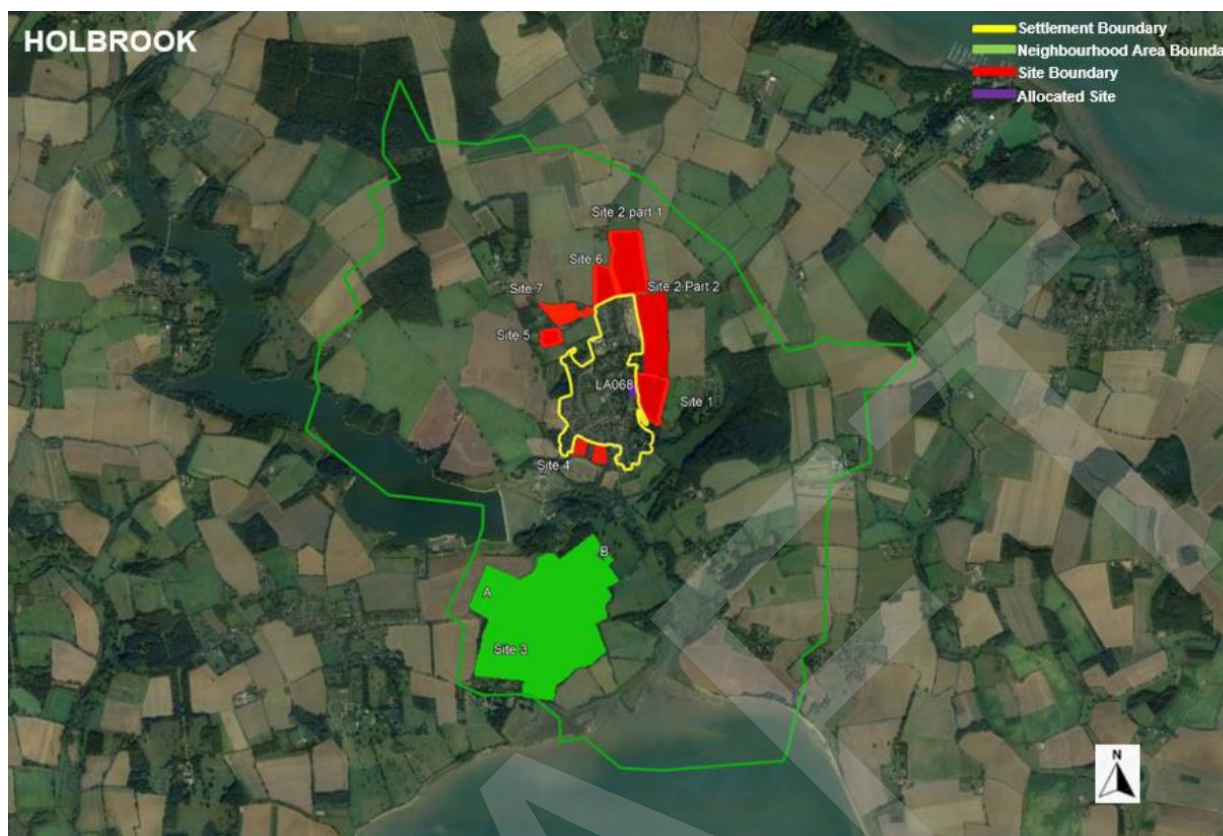


Figure 11: sites assessed by AECOM

AECOM – Site assessment conclusions

- 6.18 **Site 3:** This site was 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 of the village and is outside of 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 northwest 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. This site is not being promoted for new housing development.
- 6.19 **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.

- 6.20 **Site 2 part 1:** 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 does not conform to local policy and would constitute ribbon development.
- 6.21 **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.
- 6.22 **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 because it lies within a Cordon Sanitaire and also within an area of high heritage sensitivity.
- 6.23 **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.
- 6.24 **Site 6:** 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 in conformity with local policy and would constitute ribbon development.
- 6.25 **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.

AECOM Housing Needs Assessment

- 6.26 The Neighbourhood Plan working group commissioned a Housing Needs Assessment (HNA) to inform this Neighbourhood Plan. This section contains a high-level description of the data used and the conclusions reached in the HNA. The full report produced by AECOM can be found at <https://holbrook.suffolk.cloud/neighbourhood-plan/> [5].

- 6.27 The data sources used in the HNA include the 2001 and 2011 Census, which provides the most recent available information on the demographics, as well as the latest household projections and income estimates provided by the Office for National Statistics (ONS) and other sources providing data on the housing market.
- 6.28 The basis of the assessment are two questions agreed between the assessor and the Neighbourhood Development Plan Team.

Question 1: What type (terrace, semi, bungalows, flats and detached) and size (number of habitable rooms) of housing is appropriate?

- 6.29 Holbrook, in line with the surrounding Parishes, is dominated by medium and large properties. Properties tend to be larger in the Neighbourhood Plan Area (NPA) than the wider District (Babergh) with the average number of rooms per household space being 6.5 against 6 in the District.
- 6.30 The greatest increase over the period between censuses has been in the number of households living in dwellings of 6 and 8 rooms during this period, which equates to 3–4-bedroom homes, together with the slight reduction in the amount of smaller properties available in the NPA, which is in contrast to the moderate growth of small properties in the wider District.
- 6.31 Whilst an analysis of property types and sizes in the intercensal period suggests that there is a growing demand for medium to large properties in the NPA (5 rooms or more/ 3 bedrooms or more), it is evident from demographic modelling that demand for smaller/medium homes may increase significantly in the NPA (2–3-bedroom homes) due to an increasing older population.
- 6.32 Question 1: Whilst the demand for three-bedroom homes will remain significant, building 'more 1 or 2 bedrooms homes' will cater for the increasing older population and allow older households to downsize which will make larger family housing available for those who have preference for family homes. It will also allow younger households to form, stay in the area, or relocate.

Question 2: What Affordable Housing (social housing, affordable rented, shared ownership, intermediate rented) and market tenures should be included in the housing mix?

- 6.33 Holbrook is characterised by high proportion of home ownership, as opposed to private and social renting, which is in line with Babergh and England as a whole. While this could be taken to indicate a housing market where home ownership is within reach of most people, a more detailed analysis of affordability reveals that this is not the case. The annual income required for an entry-level home (in terms of mortgage availability, and not including the cost of the necessary deposit) is 56% higher than the lower quartile income (the lowest 25% of earners) and 38% higher than the median annual income.

- 6.34 To ensure that households on lower-than-average incomes can afford to continue living in Holbrook or form their own independent households, especially if reforms to welfare including housing benefit are implemented in the coming years, it will be important to diversify the tenure offering beyond these two most common open-market options of market sale and private renting.
- 6.35 The proportion of dwellings offered for social rent in Holbrook is two thirds of that in the wider District and, given that this is the only tenure within reach of those on lower quartile incomes, their number should be increased wherever possible. Other forms of Affordable Housing that offer a route to home ownership, such as shared ownership, should also be promoted as a way to enable households on lower incomes to own their own homes should they wish to do so.
- 6.36 Affordable housing is typically provided and made financially viable by district-wide planning policies that require it to be included at a set proportion of larger market housing developments. This policy expectation in Holbrook, if the emerging Babergh Local Plan is adopted without changes to its draft policies, is that 35% of new housing on developments providing 10 dwellings or more will be affordable.
- 6.37 The 87-unit development in Holbrook recently completed, named Admiral's Quarter, delivered 15 units of affordable rented housing and 12 shared ownership units. This goes some way to meeting the Affordable Housing need for 31 affordable rented units and 64 affordable sale units over the Plan period identified above.
- 6.38 The need to improve affordability in Holbrook across all tenures aligns with our findings in relation to the type and size of homes – that new residential development should focus on smaller dwellings. Increasing the proportion of smaller homes and more affordable types (as above) should help to rebalance the housing stock in favour of options that are both suitable to the population profile as it evolves over time and that will combat growing affordability challenges. See the full report at [5] .

Landscape Assessment

- 6.39 One of the objectives of the emerging JLP is to: "To protect and enhance environmental assets (including landscapes, biodiversity, green spaces, air and water quality, and river corridors) for current and future generations."
- 6.40 "The aims of the Joint Local Plan are to ensure sustainable development can be achieved whilst supporting the objective to contribute to protecting and enhancing our natural, built, and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including a low carbon economy ".
- 6.41 The Suffolk Coasts and Heaths AONB Management Plan (2018-2023), [8] provides detailed information about the significance of the AONB and Additional Project Area in which Holbrook is situated.

- 6.42 AFA Associates (Alison Farmer Associates) conducted a Valued Landscape Assessment of the Suffolk Coasts and Heaths Additional Project Area of the Shotley Peninsula on behalf of the SC&H AONB which was published in March 2020 [7]. The report presents a very thorough assessment of the area and states that “Holbrook has a high-quality landscape setting, reflected in the AONB designation to the south and east, and the former Dodnash Special Landscape Area to the west. The evolution of the village means that it lacks a distinct centre or recognisable/legible form. Nevertheless, its association with the surrounding valley landscape contributes strongly to its sense of place.” (AFA 2020 p36) [7].
- 6.43 The report also identifies the following Value and Significance for Holbrook:
- “Strong historic connections to the landscape including the river valley and its tributaries and designed parkland.
 - Key landmark buildings which sit and relate strongly to the surrounding landscape e.g., church and mill.
 - High quality landscape setting to south and east reflected in AONB boundary.
 - High quality landscape to the west comprising undulating topography, woodland/scrub, narrow rural lanes, historic farmsteads, parkland remnants and pre 18th century enclosures.” (AFA 2020 p36) [7]
- 6.44 The report identified the following Special Qualities of Alton Water and Holbrook Parish:
- “Notable areas of ancient woodland form skyline features, revealing evidence of former traditional management including hazel and sweet chestnut coppice stools and woodbanks.
 - Alton Water is valued for its birds offering breeding bird habitat for species such as Common Tern in summer and as a refuge/roost for wildfowl during winter months.
 - Strong recreation focus around Alton Water popular for fishing, cycling, quiet water sports, walking and visitor facilities.
 - Important habitats for stag beetle to the west of Holbrook.
 - Rural backwater and tranquillity away from main roads.
 - Notable landmarks and historic buildings coupled with rural lanes, veteran trees, and historic enclosure pattern, gives rise to tangible time depth.” (AFA 2020 p21) [7].

- 6.45 Holbrook is particularly sensitive to new development. To the North, where there is more open and flatter plateau farmland, any development would alter the perception of the location of the village and would be visually prominent over significant distances. For example, in the 21st Century, a new housing estate, Admirals Quarter, was built on the Northeast side of the settlement. It is highly visible from the Ancient Woodlands, the AONB and Addition Project Area, across open fields, the upper slopes of the river valley and neighbouring villages. As identified in the Village Questionnaire the village population do not wish to see further developments of this scale. This plan therefore provides policies to align with these wishes. The area to the east of the village is sensitive due to its elevation and proximity to Holbrook Gardens, a County Wildlife Site which is within the AONB. To the South, the village is visually sensitive in that it forms a setting to the AONB and connects the village to the river valley. This has particular value in terms of local distinctiveness (AFA 2020 p37) [7]. The land to the northwest is less sensitive, although there are narrow village lanes, valued heritage assets, such as Cherry Ground and Woodlands House, and smaller enclosures which form a transitional edge and contribute to the setting of the village.
- 6.46 The Hamlet of Lower Holbrook is connected to the village by a derestricted road edged in a number of places by housing some related to the farming aspects of the area others built as single houses. This would now be considered to be ribbon development. The hamlet sits partly within the ANOB, it has a village green at its centre and shares a number of its outlooks with Holbrook Village. A number of the houses in Lower Holbrook have views across the Stour which is SPA and SSSI.

7 KEY ISSUES / CHALLENGES FOR HOLBROOK

- 7.1 The principal objective of the Plan is to provide for the sustainable development of the village through the achievement of a better-balanced community. Historically the trend towards an increasing ageing population has accelerated and continues to do so. It is considered desirable to increase the proportion of young people living within the village by ensuring that any future developments put the emphasis on affordable, smaller homes, capable of meeting well established local needs. This should also enable older residents, who wish to downsize, to stay in the village.
- 7.2 The Neighbourhood Plan contains planning policies and proposals that relate to the use of land for development. In addition, it contains proposed community aspirations that, although not forming part of the statutory Neighbourhood Plan, provide additional locally identified projects for improvements across Holbrook.
- 7.3 The findings from the questionnaire, AECOM Housing Needs Analysis, AECOM Site Assessments, Valued Landscape Assessment have identified the following issues and challenges for Holbrook:
- a. demographics
 - b. village amenities
 - c. scale and design of future development
 - d. the environment
 - e. the village infrastructure
 - f. public transport

8 VISION AND OBJECTIVES

Vision

8.1 The following vision has been formulated for the Neighbourhood Plan:

VISION	Through fact-based investigations, public consultations, and housing needs assessment, we seek to ensure that the Parish of Holbrook grows sustainably in the future, maintaining its vibrant community, protecting the AONB, wildlife, biodiversity and improving the infrastructure, while retaining its rural characteristics for generations to come.
---------------	---

- 8.2 It is important that any Neighbourhood Plan contains a short and simple vision statement which sums up the community's aim for the future of the parish. The Neighbourhood Plan vision is an overarching statement describing what Holbrook should be like at the end of the Plan period i.e., 2037. It has been developed with local people and has been refined and adapted through consultation. The result is a vision statement which captures the overarching spirit and ambition of the local community and the Neighbourhood Plan.
- 8.3 The vision underpins the objectives and policies of the Holbrook Neighbourhood Plan and is referred to throughout. From the vision flows the different objectives of the Neighbourhood Plan and from there, the policies.
- 8.4 The objectives of the Neighbourhood Plan are broad statements of intent which are there to help deliver the vision and link to the issues that Holbrook is seeking to address. They have been drafted using themes picked up at an early stage and have been refined through the community consultation exercises.

Objectives

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

Objective 5: Ensure that the rural employment base is, where possible, retained and the supporting infrastructure for rural working is considered.

9 OVERARCHING PLANNING CONTEXT

- 9.1 As referred to earlier the housing requirement identified in the emerging Joint Local Plan for Holbrook has already met been met. Therefore, no further development is required until after 2037. Moreover, the results from the Parish questionnaire categorically show that the residents of Holbrook do not want further development in Holbrook.
- 9.2 In the 2019 HNP Call for Sites that were assessed by AECOM, all but one site was judged to be unsuitable for development. The only suitable site is the Royal Hospital School, and this is identified for school expansion and campus modernisation only not for housing.
- 9.3 However, a small amount of provision can be made to ensure sustainable growth of the Parish of Holbrook in future years. Since the publication of the 2020 draft of the BMSDC JLP, 7 new houses have been granted planning permission on the site East of Ipswich Road, which was identified in the JLP as the only site in Holbrook for potential development (site LA068). Four new homes have also been granted outline planning permission on a site along Church Hill (Application number DC/18/01256). This takes the provision in Holbrook from April 2018 to March 2022 to 69 dwellings in total.
- 9.4 The Neighbourhood Plan area will accommodate development in line with Holbrook's designation in the settlement hierarchy as a core village and taking into account the specific characteristics of the Plan area including the availability of infrastructure, health services, council services, educational establishments, and the local transport network. The focus for new development will be within the defined Settlement Boundaries as shown in Figures 12 and 13

Site allocation

- 9.5 Following our comprehensive analyses, the results of the questionnaire which categorically shows that Holbrook residents do not want to see further large-scale housing development, and the environmental sensitivity and number of designations within the Neighbourhood Area, it is not proposed to allocate any further sites within this Neighbourhood Plan for new housing development.
- 9.6 The assessment undertaken by AECOM has indicated that one site (Site 3) may be suitable for inclusion within the Neighbourhood Plan, not as a housing allocation but as suitable for educational development. This is addressed in more detail later.

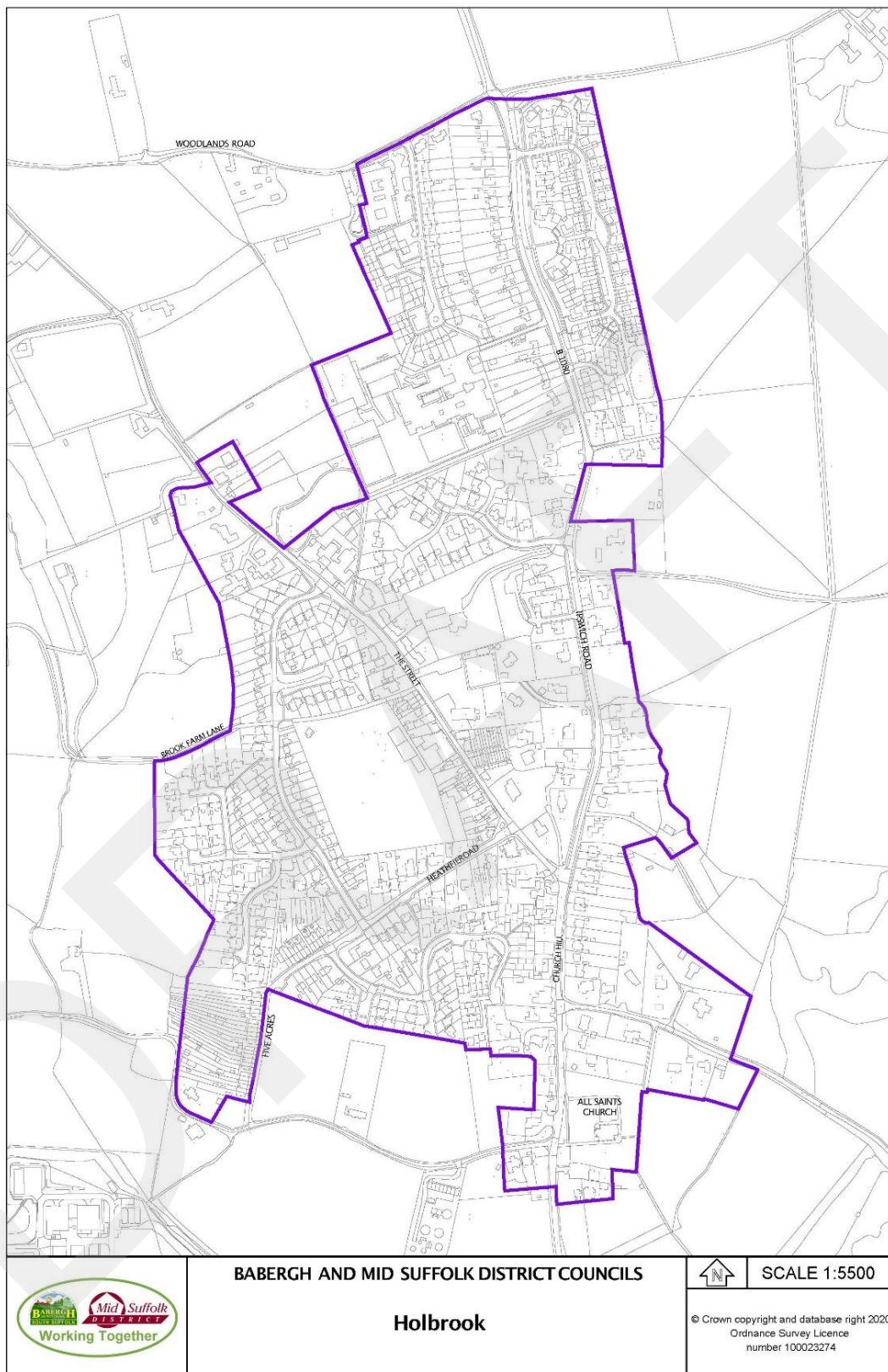


Figure 12: Holbrook Settlement Boundary

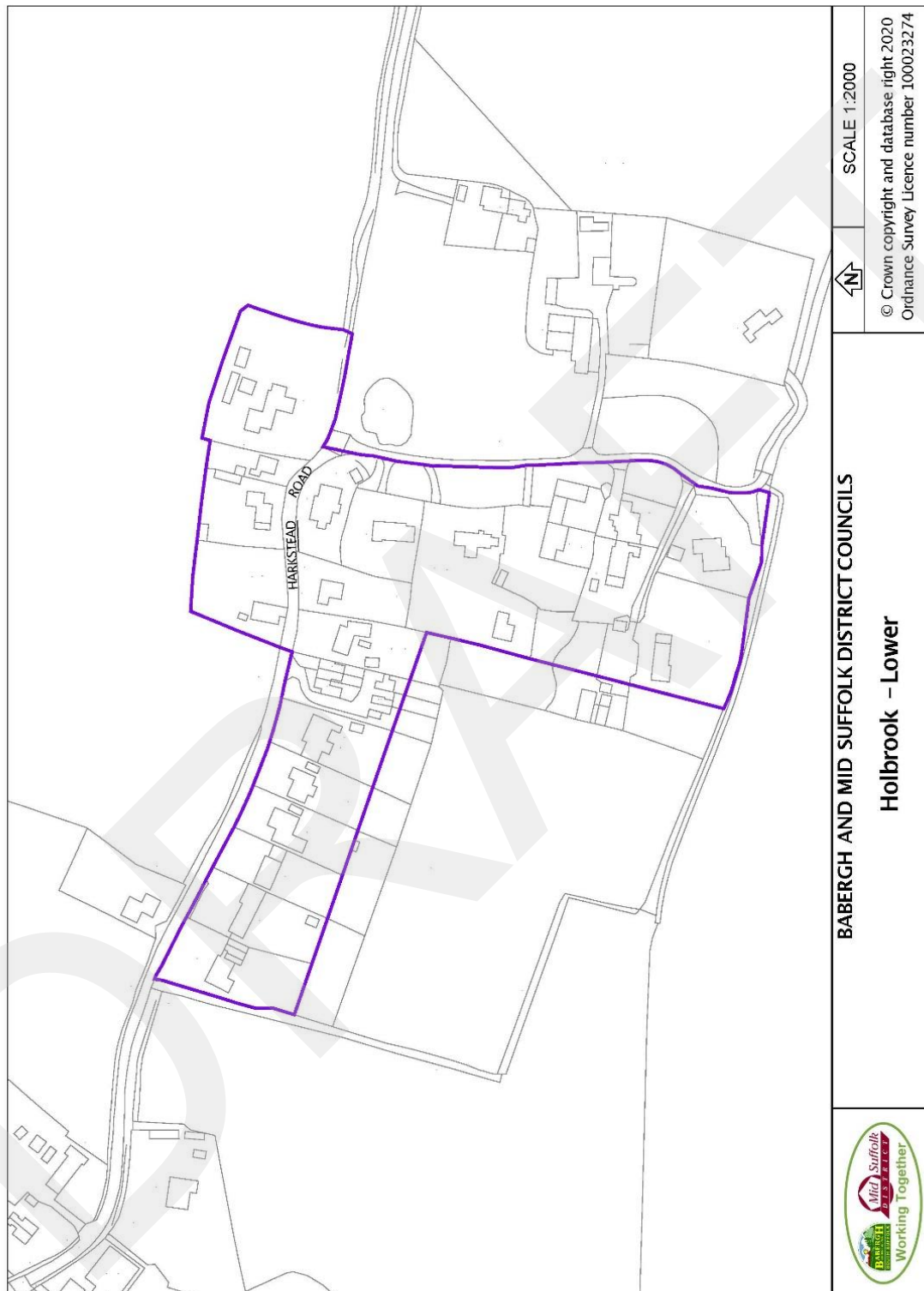


Figure 13: Lower Holbrook Settlement Boundary

10 NEIGHBOURHOOD PLAN POLICIES

10.1 The Holbrook Neighbourhood Plan consists of the following planning policies:

Housing and Development

HNP 01: Housing Development
HNP 02: Housing Mix
HNP 03: Infill Development
HNP 04: Royal Hospital School (RHS)
HNP 05: Design

Natural and Historic Environment

HNP 06: Protection Of Important Views
HNP 07: Preservation Of Dark Skies
HNP 08: Landscape Protection
HNP 09: Protection Of Woodlands
HNP 10: Protection Of Heritage Assets
HNP 11: Gardens And Amenity
HNP 12: Sustainable Drainage & Flood Risk
HNP 13: Biodiversity
HNP 14: Local Green Spaces

Policy Structure

- 10.2 The policies are each presented in the following format: 1) Reason for Policy, 2) Supporting Evidence, 3) Link to Objectives, and 4) The policy
- 10.3 The policies seek to balance the recognition that growth can bring benefits, with the need to ensure that it does not have a detrimental impact on the landscape setting and built character of the Parish.
- 10.4 They also elaborate on and provide further detail as appropriate about, how the policies will be applied in the determination of planning applications in the Parish of Holbrook.

Housing and Development Policies

HNP 01: Housing Development

Reason for policy

- 10.5 The focus for any new development sites will be consistent with the recommendations from AECOM [4], the BMSDC Joint Local Plan [2], and the wishes of the Parishioners of Holbrook [6]: they should be small scale infill developments enclosed within the Settlement Boundary.

- 10.6 The Parish of Holbrook has a particularly sensitive landscape and therefore development outside the settlement boundaries, due to its proximity to the AONB, its Additional Project Area, SSSI, Ancient Woodlands, and County Wildlife Sites would be detrimental to the setting of the village.
- 10.7 The AECOM Site Options Assessment for Holbrook [4] stated that “The clear message coming out of the [community] engagement is that residents are concerned about large scale development but accept that some development will have to happen (Parish Questionnaire March 2019)[6]. In addition, there are concerns over ribbon development.”
- 10.8 The AECOM Housing Needs Assessment (2020, p37) [5] demonstrated an increasing need for smaller homes in the Parish of Holbrook, of 1-2 bedrooms, to meet the needs of the growing older population, dependent children wanting to leave home, and for younger households to form, stay in the area or relocate to Holbrook.

Supporting Evidence

- [1] NPPF (2021) Section 5
 [2] BMSDC JLP (2023)
 [4] AECOM Site Assessment (2019)
 [5] AECOM Housing Needs Assessment (2020)
 [6] Parish Questionnaire (2019)
 [7] AFA Valued Landscape Assessment (2020)

Link to objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

HNP 01: Housing Development

The Neighbourhood Plan area will accommodate development commensurate with the designation of Holbrook and Lower Holbrook in the relevant adopted settlement hierarchy and taking into account the specific environmental characteristics of the Plan area.

The focus for new development will be within the defined Settlement Boundaries, as defined on the Policies Map, Figure 19.

Within these defined boundaries, proposals for small windfall sites and infill plots of one or two dwellings (which are not specifically identified in this Plan) will be supported where they are in accordance with other policies in this Plan.

Outside the defined settlement boundaries, proposals for new housing development including the conversion of existing buildings, such as barns and farm buildings, self-build properties, and replacement dwellings will only be permitted where they are in accordance with national and district level policies.

All infill proposals will also need to satisfy the policy objectives in **Policy HNP03**.

Developers are encouraged to consult with Holbrook Parish Council prior to the submission of any application.

HNP 02: Housing Mix**Reason for Policy**

- 10.9 Holbrook house prices are higher than the average across Babergh District making Holbrook an expensive place to live. The majority of the existing houses are large and recent developments have further increased the number of larger properties. Findings from the Parish questionnaire [6] demonstrated overwhelmingly that local people felt that there is a need for smaller affordable homes. Residents also felt strongly that there should be more provision for retirement dwellings such as bungalows to enable downsizing.
- 10.10 The Housing Needs Assessment conducted by AECOM [5] also found that: “The need to improve affordability in Holbrook across all tenures aligns with our findings in relation to the type and size of homes – that new residential development should focus on smaller dwellings. Increasing the proportion of smaller homes and more affordable types (such as shared ownership) should help to rebalance the housing stock in favour of options that are both suitable to the population profile as it evolves over time and that will combat growing affordability challenges.”

- 10.11 AECOM also made a recommendation about the type of ownership required: “It is recommended that for Holbrook, the 50% of Affordable Housing providing routes to home ownership should be focused on shared ownership at the expense of the relatively unaffordable starter homes. Of the 50% affordable rented tenures, it is recommended that the majority be supplied as social rent due to the relative unaffordability to households on lower quartile incomes.”
- 10.12 In terms of the type and size AECOM recommend the following: “The overall weighted conclusion is that to satisfy the requirements of increasingly smaller and older households, but also to enable younger households to remain in the area, it is recommended that around 50% of houses in new developments should be 1-bedroom homes, around 25% should be 2-bedroom homes and around 25% should be 3 bed homes. Bungalows appeal to older people and this particular type of housing should also be encouraged to meet the needs of a growing elderly population.” (AECOM [5], p37).
- 10.13 The importance of providing a supply of housing to meet the needs of present and future generations is highlighted in the NPPF [1]. This is due to the fact that housing needs change over time and both the supply and the demand for different types and tenures of housing is influenced by factors such as the economy and changes to government policy.

Supporting Evidence

- [1] NPPF (2021) Section 5
 [2] BMSDC JLP (2020) policies SP02,
 [5] AECOM Housing Needs Assessment (2020)
 [6] Parish Questionnaire (2019)

Link to Objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

HNP 02: Housing Mix

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

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

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

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

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

HNP 03: Infill Development**Reason for Policy:**

10.14 The focus for any new development sites will be in conformity with the recommendations from AECOM [4], the BMSDC Joint Local Plan [2], and the wishes of the Parishioners of Holbrook [6]: they should be small scale infill developments enclosed within the settlement boundary. Infill is defined as “The development of a relatively small gap between existing buildings.”

10.15 The edges of the Parish have a number of significant constraints and landscape sensitivities which require development to be focused within the settlement boundaries [2, 1]. As such, small infill developments are the most appropriate method to ensure sustainable development. There are a number of small sites adjacent to existing properties within the settlement boundaries which may be acceptable if put forward for development. This type of development would prevent coalescence with neighbouring villages and stop the threat of the creeping ribbon development particularly to the north of the village as identified by the AFA landscape assessment report [7]. This approach will protect the sensitive surrounding landscape.

10.16 Over 60% of respondents to the Parish questionnaire [6] selected Disagree or Strongly Disagree to question 29 “I think Holbrook needs more housing” and more than 80% of respondents would like to see minimal development or small infill development.

Supporting Evidence:

- [1] NPPF (2021) Section 15
- [4] AECOM Site Assessment (2019) p7 -9
- [6] Parish Questionnaire (2019)
- [7] AFA Valued Landscape Assessment (2020)
- [10] Infill Definition - BMSDC JLP (2020) Policies LP01

Link to objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

POLICY

HNP 03: Infill Development

Proposals for infill development, including replacement dwellings, within the settlement boundaries will be supported provided they meet the following criteria:

- They are sensitively designed to take account of proximity to, or location within, the AONB, AONB Additional Project Area, heritage assets, heritage coast and SSSI SPA, Ramsar site and County Wildlife Sites.
- There is no intrusion, outside the settlement boundaries, into the surrounding landscape which would cause substantial harm.
- New infill housing should be kept in alignment with existing properties such that it would retain the existing form and character of the village in terms of the local vernacular / built character.
- The density of new developments should be sufficiently spaced so as to provide for useable sized gardens, outdoor amenity space and parking spaces for residents.

(See also Policy HNP05)

HNP 04: Royal Hospital School (RHS)**Reason for Policy**

- 10.17 The Royal Hospital School is an historic and nationally recognised academic institution, key local employer, and community facility. The school was founded at Greenwich following the letters patent of William and Mary of 1694 (the Royal Charter) which created The Royal Hospital for Seamen (Greenwich Hospital).
- 10.18 The first school created under this charter was established in 1712 and located at the Old Royal Naval College in Greenwich, London. Due to continued growth, the school relocated to its current site in Holbrook in 1933, facilitated by a land and funding donation from Gifford Sherman Reade of Holbrook, in recognition of the Royal Navy's protection of his tea cargoes during World War 1.
- 10.19 The School has continued to grow as a thriving co-educational boarding and day school for 11 – 18-year-old pupils, and with a current school roll of 800 is recognised as a leading academic institution nationally, with a long tradition of music and sporting excellence.
- 10.20 At the local level, the school plays an important role as a key local employer and contributor to the local economy as summarised below.
- a. 300 x full & part time employees – providing a wide range of skilled & unskilled job opportunities for Holbrook and the wider area;
 - b. The School's Babergh (including Holbrook) GDP = £11,854,094;
 - c. Amount paid to Babergh (including Holbrook businesses) for goods & services related to the school's core functions = £845,824.
- 10.21 At the local level, the school plays an important role as a key community facility as summarised below.
- a. Community use of the gymnasium, swimming pool & flood lit all weather sports pitches;
 - b. Community use of the School Chapel, drama & performing arts facilities;
 - c. School golf course membership open to the local community;
 - d. School campus used to support major local events, such as The Great East Swim;
 - e. Local Community welcome to participate in recreational events, such as The RHS Christmas Fayre.

- 10.22 The Royal Hospital School occupies a site extending to 81ha laid out as an attractive campus of buildings in 1928 – 33 to a design by Buckland and Haywood Architects overlooking the Stour Estuary. The school's unique architectural and aesthetic heritage is recognised by the Grade 2* and Grade 2 listing of its original campus buildings, and the formal layout of its grounds which reinforce its naval history and traditions. The school is acknowledged as a nationally renowned educational institution providing for excellence in teaching and learning, and a key local employer and community facility, which needs to invest in, modernise and expand its academic, sport and accommodation facilities and energy infrastructure, in order to remain competitive within the independent school's sector and financially viable.
- 10.23 RHS has identified that it is also essential that it is able to bring forward 'campus modernisation and expansion' by investing in programmes and projects which provide energy security, which increase pupil roll capacity and maintain and enhance its academic offer, within a dynamic and competitive independent school sector. The RHS Capital Development Plan, has identified the need for a number of key investments to ensure that the school is able to compete effectively at the National Level whilst maintaining fee income at a financially sustainable level. While requirements will continue to evolve alongside changing education and business demands, the following are currently assessed as Key Short-, Medium- and Long-Term priorities for academic, sport and accommodation led capital investment projects:

Key Short – Medium Term Projects (2-5 years)

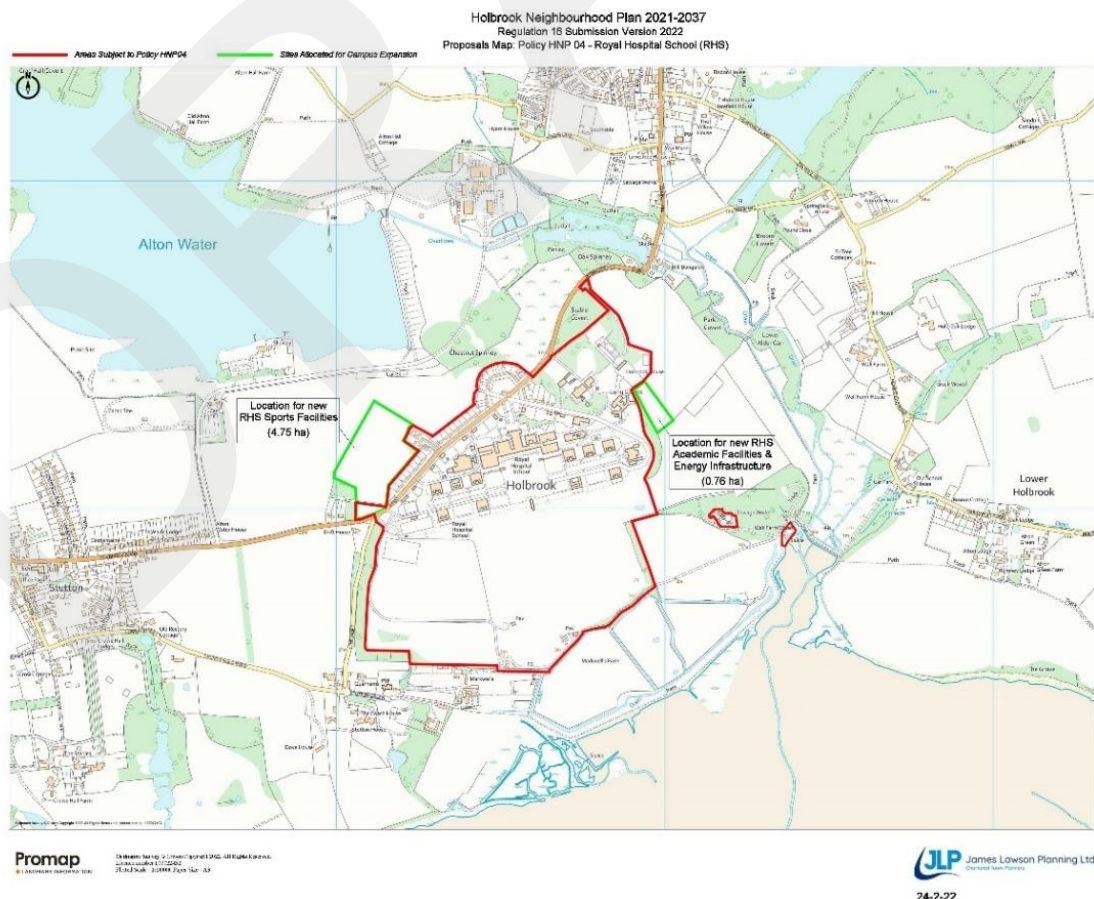
- a) Provision of alternative energy infrastructure
- b) Demolition & rebuilding of the existing 1960's science laboratory to create a state-of-the-art science teaching facility – estimated budget £10 - 12 million;
- c) Remodelling & refurbishment of the library & English area to create a 6th Form enrichment centre
- d) Conversion & remodelling of the assembly hall to create a new classroom space, drama facilities & performing arts centre
- e) Extension & remodelling of the Old Music School to create an International Study Centre with additional classroom space;
- f) Provision of new flood lit multi games area & changing accommodation.

Key Medium – Longer Term Projects (5 – 10 years)

- g) New academic facilities east of The Old Music School;
- h) New sports facilities north of the B1080 road.

- 10.24 In order to plan for school modernisation and campus expansion, and prepare business case proposals for capital investment effectively, it is necessary for the RHS Capital Development Plan along with the school's important contribution to the local economy and community, to be acknowledged and reflected in the approach and policies of the Holbrook Neighbourhood Plan, particularly as they will involve development proposals that will come forward during the Neighbourhood Plan period.
- 10.25 Two sites for alternative energy provision and campus expansion to provide new academic and sports facilities have been identified by the school. These are to the east of the Old Music School and north of the B1080 as shown on an accompanying proposals map (Figure 14), which will be brought forward in association with a master planning framework, as appropriate, and as agreed with the Parish Council, District Council and Historic England.
- 10.26 A positive, proactive, and collaborative approach will therefore be taken in principle to the school's proposals for the modernisation of its energy infrastructure, education and sports facilities in the form of building repairs, refurbishment, and the provision of new facilities both within and outside the RHS campus where such schemes are acceptable in heritage and landscape impact terms. Proposals should be identified in a site wide master planning framework, as appropriate, and agreed with the Parish Council, District Council and Historic England, having regard to the need to conserve, and where practicable, enhance the school's architectural and heritage significance and interest.

Figure 14 – Indicative locations for campus expansion at RHS



Link to objectives

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 5: Ensure that the rural employment base is, where possible, retained and the supporting infrastructure for rural working is considered.

POLICY

HNP 04: Royal Hospital School (RHS)

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

Proposals for expansion at the school should have regard to the historic significance of the site including its architectural heritage and interest.

Applications for new development will need to be accompanied by a detailed Heritage Impact Assessment which identifies the historical significance of the site, any potential impacts upon the heritage assets, together with appropriate mitigation, cognisant with the access given to the local community.

HNP 05: Design

Reason for Policy

- 10.27 One of the determinants of whether any new development is successful or not will be dependent upon how well it is considered to integrate with its surroundings. Matters such as design, impact on local character, layout and scale are the most common issues that will cause local community concerns about any impending new development. If a community believes that it has been involved in and been able to influence the design of a development at an early stage, the higher the likelihood that the development will be considered to be acceptable.

- 10.28 The results of the questionnaire gave a clear steer on this issue and supports appropriate housing of good design, that meets the needs of the community, whilst respecting the rural character of the village. In addition, the issue of replacement dwellings had been of some concern locally and it is important to ensure that any replacement dwellings are served by adequate infrastructure and that the Neighbourhood Plan should seek to prevent unusual, large new developments that are out of character with the setting and natural beauty of the AONB, heritage assets and local tradition/vernacular.
- 10.29 Whilst to an extent design and impact on local character are subjective judgements these can be influenced by breaking design elements down into component parts and attempting to address them. Whether a proposed new development is 'in keeping' with what is already there is one of the most common judgments to be made, yet there is often very little evidence or guidance to assist local people in making that judgement. In the case of Holbrook the work undertaken by AFA on Valued Landscapes and the Guidance from Suffolk Coasts and Heaths AONB has been useful to assist with that judgement.
- 10.30 A key purpose of the Neighbourhood Plan is not only to help influence the designers and proposers of development at an early stage of formulating their proposals but also to help promote an understanding of what elements make up the character of the area and what constitutes good design that respects local character.
- 10.31 Government guidance places considerable emphasis on achieving well-designed places. Section 12 of the NPPF [1] describes it as fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development proposals acceptable to communities. Effective engagement between applicants, communities and local planning authorities is essential.
- 10.32 Paragraph 127 of the NPPF [1] states 'Design policies should be developed with local communities so that they reflect local aspirations and are grounded in an understanding and evaluation of each area's defining characteristics.' Neighbourhood Plans can play an important role in identifying the special qualities of an area and how it should be reflected in development. There has been recently published a suite of documents on design including the National Design Guide¹, the National Model Design Code², and the Suffolk Design Guide³.
- 10.33 To make a decision as to whether something is 'in keeping' with the existing development is subjective. However, breaking a design down into its component parts will help with determining this – elements such as Scale, Layout, Materials, Style, Connections, Storage, Parking, and landscaping are important considerations in the design of any scheme from a single dwelling to major housing development.

¹ [National design guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/national-design-guide)

² [National Model Design Code - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/national-model-design-code)

³ [Suffolk Design Guide for Residential Areas | Suffolk County Council](https://www.suffolk.gov.uk/design-guidance)

- 10.34 Effective engagement between applications, communities and local planning authorities is essential. Landowners and developers will be encouraged to liaise with the village, via the Parish Council and the Neighbourhood Plan Working Group (or its successor) regarding key aspects of design including materials, styles, density, layout etc, before submitting a site for planning consideration.
- 10.35 The NPPF [1] indicates that planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of the area and the way it functions. Therefore, the following policy has been devised with this in mind.

Supporting Evidence:

- [1] NPPF (2021)
[6] Parish Questionnaire (2019)
[11] Suffolk Coasts and Heaths AONB "Guidance on the selection and use of colour in development" (2018)

Link to objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

HNP 05: Design

Proposals for new development will be supported provided that the proposed design reflects Holbrook's local distinctiveness and character and seeks to enhance its quality.

The design of all proposals should be based on an understanding of the context of Holbrook. All proposals for new development should respect the scale, materials, form, function, and character of the existing and surrounding buildings in the area.

All proposals for new development should meet the following criteria.

Design and Materials:

1. Incorporate good quality design which maintains or enhances the character, appearance and setting of existing buildings and street scenes.
2. Not have an unacceptable impact on the amenities of neighbouring occupiers, or impact significantly on the landscape setting, the AONB or its setting,
3. Within the AONB, have regard to the Suffolk Coasts and Heaths "Guidance on the selection and use of colour in development" 2018 document [11].

Access and Layout:

4. Development proposals should incorporate good pedestrian and cycle routes within the development and maximise opportunities for residents to travel sustainably (walking, cycling etc.) by ensuring that adequate links exist or can be provided into the village centre and to the local schools.
5. Development which would adversely affect the character of or result in the loss of, an existing or proposed Public Right Of Way (PROW) will not be permitted unless alternative provision or diversions can be arranged which are at least as attractive, safe, and convenient for public use. Improvements and additions to such PROW shall be delivered as an integral part of new development to enable new or improved links to be created within the settlement, between settlements and/or providing access to the countryside or green infrastructure sites as appropriate.
6. Provision of sufficient external amenity space for refuse and recycling storage.
7. Accommodate parking consistent with the Suffolk Guidance for Parking 2019 or successor documents, including secured cycle storage, and a proportion of on street parking provisions, that are well-designed and integrated within new developments.
8. Where garages are proposed ensure that they are of sufficient dimensions to accommodate an average sized car and allow for the opening of the car doors.
9. Include built in crime reduction measures having regard to the guidance in Secure by Design to minimise the likelihood and fear of crime.

Landscaping:

10. Include soft well landscaped soft boundary edges, where adjacent to open countryside or edge of settlement.
11. Minimise the loss of trees and hedgerows to enable necessary road access and visibility splays.
12. Retain existing tree belts and hedgerows making a feature of them as part of the development.
13. Include tree-lined streets unless in specific cases there are clear justifiable and compelling reasons why this would be inappropriate.

Support is also given to the use of environmental and sustainable measures within proposals as appropriate. These could include but are not limited to the following: electric charging points, solar panels, extensive insulation, and Heat Pumps.

Natural and Historic Environment Policies

HNP 06: Protection of Important Views

Reason for Policy:

- 10.36 Although Holbrook does not have a Conservation Area, it does sit within both designated AONB and the Additional Project Area of the AONB. The NPPF [1] states that “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.” It continues in section 15 to state that “The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.”
- 10.37 AFA (2020) noted a number of special qualities [7], and also remarked about significant views in the main settlement, such as the RHS clock tower, the church, the mill house, the ancient woodlands on the horizon, and the views from the sloping valley sides. This is in addition to the important views into and out of the designated AONB and the Heritage Coast [8].
- 10.38 The respondents to the Parish questionnaire [6] commented about the importance of retaining the beauty of the local area. To the question “Open views across fields and woods are important to me” 95% of respondents agreed or strongly agreed.
- 10.39 The views identified are described below:

1. **View from fields to the North of the Parish** in proximity to the newly designated AONB and the Ancient Woodlands at Holbrook Park. The landscape is categorised as Ancient Estate Farmlands. The view is from the PROW across fields in which there is a Neolithic Enclosure (a Scheduled Ancient Monument) and in which ancient artefacts, such as a Roman Coin hoard, have been found.
2. **View from the PROW along the edge of Hales Grove.** Looking out across the Ancient Estate Farmlands to the distinctive landmark of the clock tower of the Royal Hospital School. The view is across fields which have a network of footpaths and bridleways in constant use by local residents. This demonstrates the “Rural back-water and tranquillity away from main roads” AFA (2020).
3. **View from the junction between Woodlands Road and The Street.** This view is across open arable fields to the Grade II listed 16th Century cottage, Cherry Ground. This is an example of the characteristic winding single-track lanes in the Parish. This area has a particularly high population of breeding stag beetles. “Notable landmarks and historic buildings coupled with rural lanes, veteran trees and historic enclosure pattern, gives rise to tangible time depth.” AFA (2020).
4. **View from the PROW along the Farm Track to the Grove Farm across the rolling landscape to the North of the Parish.** Views from this point to the West show the distinctive wooded horizon of the newly designated AONB of the Ancient Woodlands and towards the neighbouring parish of Freston. The view also takes in the Neolithic Enclosure to the North where the Long Barrow is situated.
5. **View from the footpath behind Admirals Quarter across fields to Holbrook Gardens AONB/County Wildlife Site (CWS).** The undulating valley slopes provide a contrast to the flatter fields for walkers. “The parkland landscape to the east, at Holbrook Gardens, is an extensive post-medieval landscape which contains lakes, fishponds and extensive tree cover on the valley slopes” AFA (2020).
6. **View from Woodlands Road** which is enjoyed by elderly care home residents at St Mary’s, and walkers, across the fields to the ancient woodlands at Cutler’s Wood / CWS/ AONB. The grade II listed Cherry Ground is also in view across the open plateau Ancient Estate Farmlands here to the North of the Parish. Herds of deer and other wildlife such as hare are regularly seen from the PROW across the fields.
7. **View from the River Stour into Holbrook Bay and Holbrook Creek.** Clear views from the River Stour to the Royal Hospital School which is an important local landmark. This area lies within the Site of Special Scientific Interest (SSSI) and is home to a wide range of waterfowl. “Holbrook Village has a strong connection with Holbrook Royal Hospital School to the south although physically and perceptually they are quite distinct” AFA (2020, p36).

8. **View from the top of the hill at Lower Holbrook across to the Stour Estuary** taking in Holbrook Creek and the Royal Hospital School. The area falls within the AONB and the SSSI. It is a truly spectacular view which is enjoyed by walkers, holidaymakers, and local residents.
9. **View across Alton Water north eastwards towards Holbrook Church.** PROW across the dam wall and around the reservoir enables visitors to enjoy the scenery, wildlife and take exercise. The reservoir area is a CWS due to its important habitat mosaic. "Alton Water is a small-scale reservoir defined by gentle sloping valley sides giving the appearance of a large linear lake" AFA (2020, p28).
10. **View from the PROW on the dam wall at Alton water** across the valley easterly towards Hyams Lane, the Grade II* listed church, and the centre of the village. "The open water of the reservoir and bird life it attracts makes a significant contribution to tranquillity." AFA(2020, p20) "Notable landmarks and historic buildings coupled with rural lanes, veteran trees and historic enclosure pattern, gives rise to tangible time depth" AFA (2020, p21).
11. **View from the parade ground at the Royal Hospital School across the sports fields** towards the River Stour. This is an impressive view across Holbrook Bay to the newly designated AONB, which also includes views of the shoreline at Wrabness on the opposite side of the River Stour.
12. **View across the valley and into Holbrook Gardens** which "is an extensive post-medieval landscape which contains lakes, fishponds, and extensive tree cover on the valley slopes... There is inter-visibility between key landmark buildings and across the valley landscape, including between the church and mill, and church and Holbrook Gardens." AFA (2020). There are several footpaths that look into Holbrook Gardens that are regularly enjoyed by walkers.
13. **View out from the AONB across the stream that flows into Holbrook Gardens**, looking towards the centre of the village and Admiral's Quarter. The footpaths in this area form connections with the surrounding parishes and into Lower Holbrook.
14. **View along Church Hill to the 19th century watermill** which is located within the valley next to the river. This view demonstrates "Key landmark buildings which sit and relate strongly to the surrounding landscape e.g. church and mill." AFA (2020, p36) The mill is visible from the road and footpath and is located opposite the ornamental lake formed at the bottom of Holbrook stream valley.

Supporting Evidence:

- [1] NPPF (2021) Section 15 and 10
- [2] BMSDC JLP (2023) policies
- [4] AECOM Site Assessment (2019) p7-9

- [6] Parish Questionnaire (2019)
- [7] AFA Valued Landscape Assessment (2020)
- [8] Suffolk Coast & Heaths AONB management Plan (2018-2023)
- [9] Suffolk Landscape Character Appraisal

Link to objectives:

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

POLICY

HNP 06: Protection of Important Views

Important views from public vantage points either within the built-up area or into or out of the surrounding countryside, are identified on the Policies Map, Figure 19, and the Important Views Map as shown in Figure 15.

Any proposed development should seek to retain the defined important views in and out of the built-up area and protect key landscape features visible from these vantage points/vistas.



Figure 15: Important Views Map Into and Out from the Area of Outstanding Natural Beauty

HNP 07: Preservation of Dark Skies**Reasons for policy**

- 10.40 The NPPF notes in paragraph 185: By encouraging good design, planning policies and decisions should “limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.” In the 2018-2023 AONB Management Plan [8] it states that: “Adopting best practice in the careful use of lighting must be an increasing priority for local authorities, businesses and residents within the Suffolk Coast & Heaths AONB.”
- 10.41 MSDC Policy LP20 [2] states that: “The Councils will support non-major development within the AONBs and development within the setting of the AONBs that is sensitive to the natural and built landscape and visual impacts (including on dark skies)”.
- 10.42 The NPPF [1] states:
- “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
- a) mitigate and reduce to a minimum potential adverse impact resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life.
 - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value or this reason; and
 - c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”
- 10.43 The Parish Questionnaire [6] comments demonstrated that Parishioners preferred dark skies so as to ensure that the village retains its rural setting. In addition, where there have been new dwellings constructed along the river, these contain significant areas of glass on the riverside elevations in order to afford their residents views across the river. However, where these are lit at night, they are extremely visible from the river and can cause disorientation to vessels and a navigation hazard.
- 10.44 Suffolk Highways, who have responsibility for street lighting, have a “part-night light” scheme whereby the street lighting is switched off between 11:30 pm and 6:00 am. The lights will then come back on after 6am if the sensors detect it is dark enough for lighting to be required. There are other initiatives which are seeking to reduce light pollution and running costs [15].

Supporting Evidence

[1] NPPF (2021) paragraph 185

[6] Parish Questionnaire (2019)

[8] Suffolk Coasts and Heaths AONB Management Plan 2018-2023 p48

[15] Suffolk County Council www.suffolk.gov.uk/roads-and-transport (Lighting)

Link to objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

POLICY

HNP 07: Preservation of Dark Skies

While ensuring that new development proposals are secure in terms of occupier, other user and vehicle safety, dark skies are to be preferred over lighting.

Where planning permission is required, all outdoor lighting scheme (including street-lighting), should be designed so that they minimise their overall impact on the environment, including through making use of energy efficient technologies and using technologies that minimise adverse impacts on wildlife.

Where appropriate to the development proposal, planning applications should include a detailed lighting proposal that demonstrates how the scheme addresses both energy and environmental concerns without comprising safety including navigation safety.

Street lighting should be kept to a minimum subject to highway safety, the needs of particular individuals or groups, and security.

HNP 08: Landscape Protection**Reason for Policy**

- 10.45 Holbrook is noted as being a particularly beautiful place to live. It has a high-quality landscape setting, with Ancient Woodlands, Ancient Estate Farmlands, Rolling Estate Farmland, and Valley Meadowlands. The way in which the village has evolved from the area around the church and the mill, means that it lacks a distinctive centre, and it has seen housing development creep northwards over the years. However, the village has a very strong sense of place due to its strong historic connections with the landscape and association with the surrounding valley landscape on the Shotley Peninsula.
- 10.46 Part of the Parish of Holbrook sits within the designated Suffolk Coasts and Heaths Area of Outstanding Natural Beauty (AONB) [8]. The area of land in the parish covered by the AONB designation increased when the AONB extension was approved in July 2020. (See Figure 16 below). The area of AONB within the parish is largely located to the south of the parish with the exception of a portion Great Birch Wood located to the north. The area of AONB includes Holbrook Gardens at the eastern extent of the parish, the dam and the Royal Hospital School to the west, land between Fishponds Lane and Church Hill, and land west of Fir Tree Hill and Harkstead Road in Lower Holbrook. The designation also extends into parts of Holbrook Bay. According to the NPPF (July 2021) [1] “Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.” The Variation Order to extend the Suffolk Coast & Heaths AONB was signed off by Natural England and the Secretary of State in June 2020. This Variation Order extends the AONB further into the Parish of Holbrook encompassing the Ancient Woodlands at Holbrook Park and Cutler’s Wood. The remainder of the parish, which falls outside of the AONB sits within an area known as the ‘Additional Project Area’.
- 10.47 The BMSDC Joint Local Plan also places great weight on the importance of preserving the landscape and “it recognises the particular qualities and features of landscapes to provide an understanding of distinct sense of place and sensitivities to development and change” [2].
- 10.48 The JLP seeks to protect and where possible enhance the landscape taking into account areas of outstanding natural beauty, and features of historic and archaeological interest. The JLP supports development within the AONB as long as it conserves and enhances the landscape and scenic beauty, and “does not adversely affect the character, quality views and distinctiveness of the AONB or threaten public enjoyment of these areas” [2].

- 10.49 Thea area to the south of the Parish, which meets the River Stour, is designated as Heritage Coast, which is identified as part of the AONB, and includes the Stour and Orwell Walk. This section of Coastline is defined as “Areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors” [1]. There are a number of County Wildlife Sites in the parish which include Hales Grove, Great Birch Wood CWS which is partially in Holbrook, Alton Water CWS and Lower Holbrook Reedbed CWS
- 10.50 Holbrook is particularly sensitive to new development. To the North, where there is more open and flatter plateau farmland, any development would alter the perception of the location of the village and would be visually prominent over significant distances. In the 21st Century, a new housing estate, Admirals Quarter, has been developed on the Northeast side of the settlement, which is highly visible from the Ancient Woodlands, across open fields, the upper slopes of the river valley and neighbouring villages. The area to the east of the village is sensitive due to its elevation and proximity to Holbrook Gardens which is within the AONB. To the South, the village is visually sensitive in that it forms a setting to the AONB and connects the village to the river valley. This has particular value in terms of local distinctiveness (AFA 2020) [7]. The land to the northwest is less sensitive, although there are narrow village lanes, valued heritage assets, such as Cherry Ground and Woodlands House, and smaller enclosures which form a transitional edge and contribute to the setting of the village.
- 10.51 The responses to the Parish Questionnaire demonstrated that over 95% of local residents stated that they agreed or strongly agreed that the views, footpaths, and local landscape should be protected from further development [6].
- 10.52 Development that is not carefully considered and which fails to properly mitigate any negative impacts would have a detrimental impact on the quality of this environment [7]. The policies in this section of the Neighbourhood Plan seek to balance the recognition that growth can bring benefits with the need to ensure that it does not have a detrimental impact on the landscape setting of the Parish.

Supporting Evidence

- [1] NPPF (2021)
- [8] Suffolk Coasts and Heaths AONB Management Plan (2018-2023)
- [2] BMSDC JLP 2020
- [7] AFA Valued Landscape Assessment (2020)
- [11] Suffolk Coasts and Heaths “Guidance on the selection and use of colour in development”.
- [6] Holbrook Parish Questionnaire (2019)
- [4] AECOM, Site Options Assessment, (Dec 2019).

Link to objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

POLICY

HNP 08: Landscape Protection

To ensure that the valued landscapes and natural beauty within the Parish, which fall within the designated AONB and Additional Project Area, (as shown on Figure 16) are conserved and enhanced for future generations to enjoy, any application for development within the Parish of Holbrook must be supported by a full Landscape and Visual Assessment (LVA), or Landscape Appraisal or other appropriate and proportionate evidence to demonstrate how the proposal:

1. Avoids coalescence with neighbouring villages.
2. Ensures that any new buildings are screened, where appropriate with mature vegetation from views looking out of the AONB and Additional Project Area.
3. Helps conserve and enhance the natural beauty of the AONB, its setting, and Additional Project Area.
4. Ensures that building materials, colours and styles reflect the local vernacular. In particular, within the AONB, have regard to the Suffolk Coasts and Heaths AONB “Guidance on the selection and use of colour in development” (2018) document [11].
5. Retains the rural character and tranquillity of the Parish.
6. Retains and where appropriate improves public rights of way and linkages to the village and beyond the Parish boundary into the countryside and AONB.

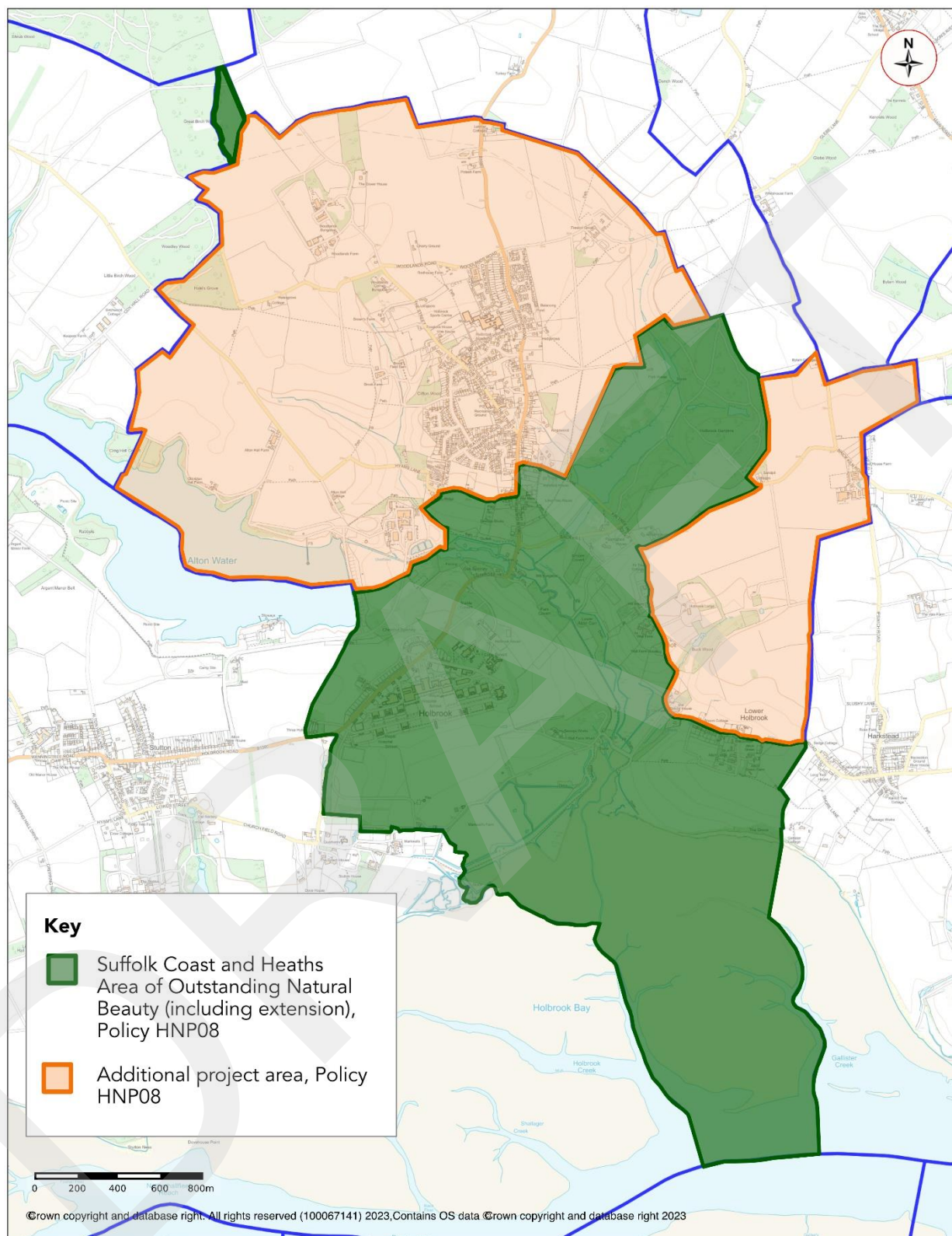


Figure 16: AONB including Additional Project Area within the Neighbourhood Area

HNP 09: Protection of Woodlands

Reason for Policy

- 10.53 The world's leading climate change scientists in a report by the UN Intergovernmental Panel on Climate Change (IPCC) [27], have warned we have approximately 10-12 years to restrict Global Warming to 1.5c above pre-industrial levels. After which, eco systems will be severely impacted in a devastating way. Forest and woodland take hundreds of years to mature supporting important eco-systems, biodiversity, and natural habitat for most of the worlds living creatures. They are literally the lungs of the planet critically important for the absorption of CO2 emissions being constantly pumped into the atmosphere by an ever-increasing world population. With this in mind it's vital Holbrook protects its precious woodland for the sake of nature's habitats, for all mammal, bird, amphibian, and insect species as well as residents' health, wellbeing, and happiness, now and for future generations. Also, more broadly the planet's overall survival itself. Holbrook in past years has lost considerable amounts of woodland to development. The Neighbourhood Plan seeks to make sure going forward into the future this never happens again and woodland is protected from human encroachment.
- 10.54 Holbrook partly sits in and is surrounded by Areas of Outstanding Natural Beauty [7].
- 10.55 The country needs more trees and plants to offset the damaging effects of carbon on our planet.
- 10.56 The Holbrook Neighbourhood Plan Consultation Questionnaire [6] asked residents - Hedgerows and Trees need to be preserved? Overwhelmingly the community answered Strongly Agree/Agree 97.36%. Asked if - Open views across the fields and woods are important to me? Residents responded emphatically, Strongly Agree/Agree 97.71%. When asked - Holbrook should retain its rural characteristics? Again, overwhelmingly residents answered Strongly Agree/Agree 99.25% . Asked if - Areas of Outstanding Natural Beauty should be protected from development? Again, residents clearly responded, Strongly Agree/Agree 97.93% When asked - I value the wildlife in and around Holbrook? Residents responded Strongly Agree/Agree 99.62%.
- 10.57 See all woodlands as shown on Policies Map (Figure 19) and Figure 17 below.

Supporting evidence

[27] UN Intergovernmental Panel on Climate Change (IPCC): <https://www.ipcc.ch/>

[6] Parish Questionnaire (2019)

[7] AFA Valued Landscape Assessment (2020)

Link to objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

POLICY

HNP 09: Protection of Woodlands

Within the Neighbourhood Plan Area, woodlands (including irreplaceable habitats such as Ancient Woodlands, veteran trees and trees protected by Tree Preservation Orders) which contribute to the character of Holbrook will be protected from development that would have a significant adverse effect upon their character, appearance, and wildlife value.

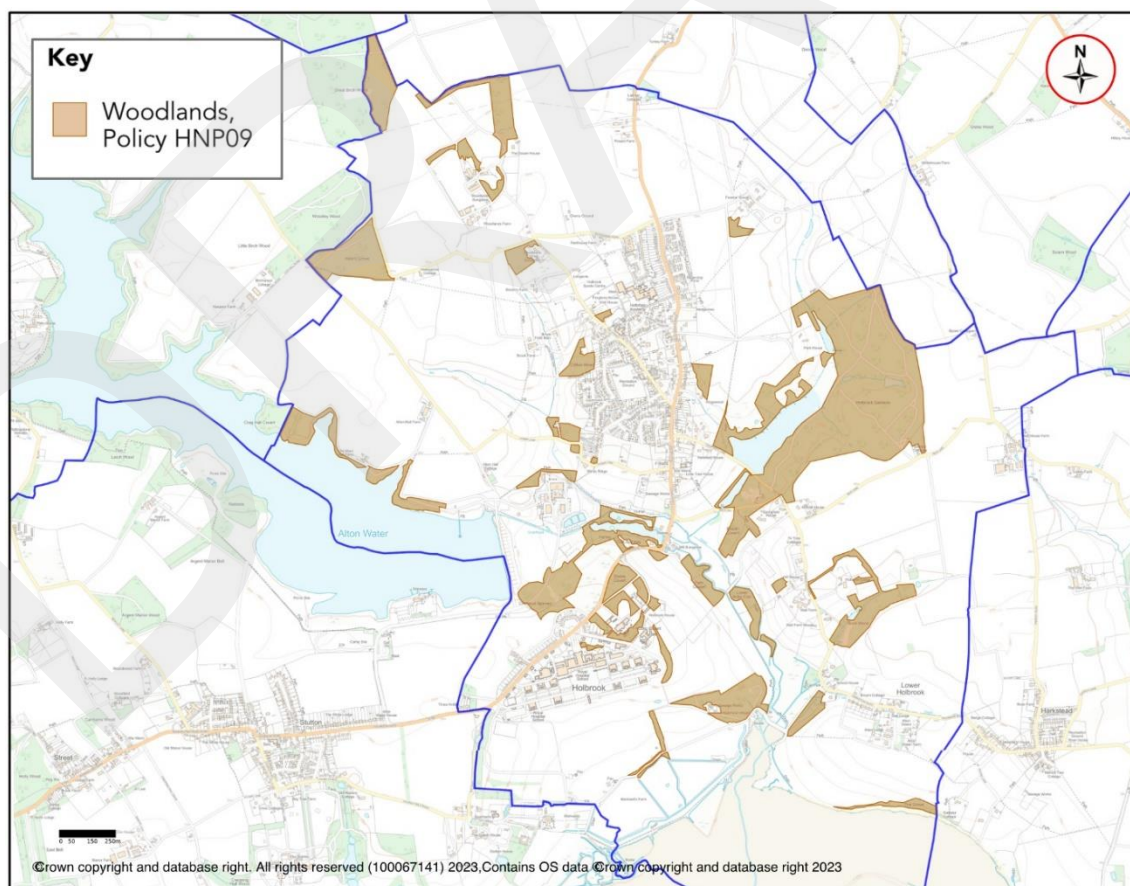


Figure 17: Woodlands

HNP 10: Protection of Heritage Assets

Reason for Policy

10.58 Holbrook is fortunate in having a number of significant heritage assets.

10.59 According to Place Services (2018, [13]), there are a number of important listed buildings within the boundary of the settlement, including the highly significant Parish church, the 15th century Cherry Ground, primary school hall, and listed farmhouses and cottages. These along with Holbrook Gardens to the east are of high value. The majority of the settlement is of modern origin and the main centre of the settlement as a whole is of lower heritage value. The complex of buildings associated with the Royal Hospital School, located to the south are of high value, but do not have such a high visual and physical association with the centre of the village settlement. However, the RHS clock tower is visible from a large area in and around the main settlement of the Parish and has high value amongst the local population. The Parish also contains the Scheduled Ancient Monument Neolithic Enclosure and Field System north of the village where Roman Coin Hoards and other significant artefacts have been discovered [14]. At another site, the Holbrook Horse Harness was found which is now in a museum. In addition, the parish contains the Scheduled Monument of the Causewayed Enclosure at Turkey Farm (as investigated as the Freston Dig) which is partially in Holbrook.

10.60 Significant regard must also be placed on heritage assets as detailed in the BMSDC JLP. The plan states: "Heritage Assets are defined by the NPPF as 'A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest' [2]. It includes nationally designated heritage assets, other non-designated heritage assets and sites of potential archaeological interest."

10.61 The Government's Planning Practice Guidance (PPG)⁴ recognises that there are buildings, monuments, sites, places, areas, or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'. The PPG goes on to explain that these can be identified through Local Plans (and now most commonly through Neighbourhood Plans) and are a positive way for the local planning authority to identify non-designated heritage assets against consistent criteria so as to improve the predictability of the potential for sustainable development.

⁴ <https://www.gov.uk/government/collections/planning-practice-guidance>

- 10.62 The NPPF 2021 at paragraph 203 indicates that the effects of an application on the significance of a non-designated heritage assets should be considered when determining applications. Suffolk County Council Archaeological Service routinely advises that there should be early consultation of the Historic Environment Record and assessment of the archaeological potential of proposed sites at an appropriate stage in the design of new developments, in order that the requirements of the NPPF and Local Plan policies are met. Suffolk County Council Archaeological service is happy to advise on the level of assessment and appropriate stages to be undertaken.
- 10.63 Babergh District Council are supporting the identification of non-designated heritage assets through Neighbourhood Plans. This Neighbourhood Plan does not formally identify specific important heritage assets and historic features within the parish as non-designated heritage assets, although it may be something that the parish will produce to inform a review of the Neighbourhood Plan. The identification of character buildings and historic features will help to reinforce the local distinctiveness and character of Holbrook ensuring that any application for planning permission takes account of the desirability of their conservation and that Babergh District Council gives them due weight in the determination of applications [2].

Supporting Evidence

- [1] NPPF (2021) Presumption in favour of sustainable development and Section 16
 [2] BMSDC JLP (2023) policies
 [13] Place Services: Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk District Councils (2018)
 [14] Suffolk Heritage Web site – <https://heritage.suffolk.gov.uk/>
 [28] LUC report 2021, SA Objective 12 p24

Link to objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

HNP 10: Protection of Heritage Assets

Planning proposals that may affect the character, significance and setting of the parish's designated heritage assets will only be supported where they:

1. preserve or enhance the significance of the heritage assets of the village, including the contribution made to their setting and the wider built environment, including views into, within and out of the Parish.
2. retain buildings and spaces, the loss of which would cause harm to the character or appearance of the surrounding area.
3. improve or bring a redundant heritage asset, e.g., a barn, back into use provided that the proposal also satisfies other relevant policies in the HNP.
4. contribute to the village's local distinctiveness, built form and scale of its heritage assets through the use of appropriate design and materials in keeping with the local vernacular.
5. be of an appropriate scale, form, height, massing, alignment, and detailed design which respects the area's character, appearance, and its setting.
6. demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits, and
7. provide clear justification, in a heritage statement, for any harm to the significance of the heritage asset.

See also **Policy HNP 05: Design**

HNP 11: Gardens and Amenity**Reasons for policy**

- 10.64 Gardens create spaces for children to play and for adults to relax. The Royal Horticultural Society quotes the new NHS Long Term Plan (2019) [16] in the contribution of personal green space and the subsequent opportunities for healthier, happier lifestyles. Social prescribing will enable more people to get outside, start growing plants, enjoy the space with family and friends, and gain the health benefits of being active outdoors.
- 10.65 Gardens (especially front gardens) are also an important feature of the current landscape, and overall make a significant contribution to the mental health and wellbeing of the inhabitants. This was reinforced by the results of the questionnaire in which the people of Holbrook stated that they value green spaces and enjoy the annual Holbrook Open Gardens for example
- 10.66 Discussions are ongoing between the Parish and the District Council in respect of green spaces owned by BDC, to explore the possibility of more allotments. All Saints Church site has a waiting list of 20 plus years and some residents including young people would like the opportunity to have an allotment with all its benefits

Supporting Evidence

[16] NHS Long Term Plan (2019) chapter on Health and the Environment

<https://www.longtermplan.nhs.uk/>

[6] Holbrook Parish Questionnaire (2019)

Link to objectives

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

POLICY

HNP 11: Gardens and Amenity

Development proposals within or adjacent to areas where the prevailing character of the area is of large front gardens, will be expected to continue with this characteristic.

All new residential units will be expected to have direct access to an area of private amenity space. The form of amenity space will be dependent on the form of housing and could include a private garden, balcony, glazed winter garden or ground-level patio with defensible space from any shared amenity areas.

In providing appropriate amenity space, all new residential development should:

1. consider the location and context of the development, including the dominant character of the surrounding area.
2. take into account the orientation of the amenity space in relation to the sun at different times of day/year.
3. minimise the impact of overlooking and enclosure, which may otherwise impact detrimentally on the proposed dwelling and any neighbouring dwellings.
4. design any shared amenity space to be of a shape, size, and location to allow effective and practical use of and level access to the space by residents, and
5. if shared amenity space is proposed, where feasible and where garden space is limited, provide an area for “shared allotments” within the shared amenity space so that the nature of the food-producing community can be upheld.

See also **Policy HNP 05: Design**

HNP 12: Sustainable Drainage and flood risk**Reason for Policy:**

- 10.67 Holbrook Village is situated some 29 metres above sea level and the area of Lower Holbrook 10 metres above sea level. The Parish of Holbrook is thus susceptible, in parts, to differing flood risks including river/sea surge flooding from the River Stour. Flooding is also possible downstream from Alton Water Reservoir due to flash storms, upstream incapacity causing overflow to the downstream Holbrook Mill stream.
- 10.68 Localised flooding can occur due to poor / inadequate design and maintenance of agricultural drainage ditches combined with field runoff. Localised flooding does occur at various locations around the Parish due to poor design of past developments drainage systems and impervious surfaces, poorly contoured road surfaces, a lack of a surface water sewer main and inadequate maintenance of what exists currently to deal with surface water.
- 10.69 The land between Lower Holbrook and the River Stour with its extensive River Stour frontage is susceptible to bank erosion. Lower Holbrook is also subject to agricultural surface water runoff which is channelled to the Alton Green Pond and which requires regular maintenance. The pond is itself drained into the stream which feeds into Holbrook Creek; this drainage is not without maintenance issues. The Environment Agency Flood risk maps [19] indicate a 1-3% risk of flooding defined as low to high risk. The evidence for the need for this policy can be seen from the Environment Agency's map extracts showing areas of risk of surface water flooding, the risk from river and seas and the risk from the local reservoir flooding [19].

Supporting Evidence:

- 10.70 The Flood and Water Management Act 2010 [17] required Suffolk County Council to take the lead role in managing local flood risk (LLFA). Babergh District Council is an included Partner in the Suffolk Flood Risk Partnership who together has developed The Suffolk Risk Management Strategy (SFRMS) [18]. The Partnerships together with the Environment Agency and Green Suffolk have produced guidance on development of Sustainable Drainage System (SuDS). The revised national Planning Policy framework, July 2021 (NPPF), Section 169, [1] requires that all major development incorporates Sustainable Drainage Systems unless there is clear evidence that this would be inappropriate.

[17] Flood and Water Management Act (2010):

https://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf

[18] The Suffolk Flood Risk Management Strategy (SFRMS) (2016):

<http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/SFRMS-Summary.pdf>

[19] Flood Risk Maps: <https://flood-warning-information.service.gov.uk/long-term-flood-risk>

Link to objectives

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

POLICY

HNP 12: Sustainable Drainage and Flood Risk

All development proposals (including minor development) are required to use appropriate sustainable drainage systems (SuDS), wetland and water features to protect against pollution, provide drainage and wider amenity, recreational and biodiversity benefits.

All development will be expected to demonstrate how it can mitigate its own flooding and drainage impacts, avoid increased flooding elsewhere and seek to achieve lower than greenfield runoff rates.

See Also Policy HNP 05: Design

HNP 13: Biodiversity

Reason for Policy

- 10.71 Wherever possible, hedges rather than fencing should divide property boundaries. This is to ensure that all help is given to conserve and enhance wildlife and the habitats that it relies on across the parish. As an example, nesting birds and hedgehogs.
- 10.72 The aim of the policy is to improve the wellbeing and quality of life for all village residents and wildlife by supporting and enhancing local biodiversity and Holbrook's eco system. The Parish of Holbrook lies within the Suffolk Coast and Heaths AONB, it has an SSSI, and is a Ramsar designated area. According to the Suffolk Coasts and Heaths Management Plan 2018-2023 [8] "Ramsar sites are wetlands of international importance designated under the Ramsar Convention (1971), an intergovernmental treaty which provides the framework for national action and international cooperation for the conservation and wise use of wetlands and their resources."

- 10.73 Babergh and Mid Suffolk Districts together with Ipswich Borough and East Suffolk Council are taking a collaborative approach to strategic mitigation to support development and avoid impacts on internationally important designated wildlife sites. The councils have produced a combined recreational disturbance, avoidance, and mitigation strategy (Suffolk RAMS) for the area. This identifies and costs measures necessary to mitigate recreational impacts and confirms how they will be funded and delivered over the lifetime of the Local Plans. Such measures are to be delivered strategically through the Suffolk Coast RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from proposed residential development in the Zone of Influence (ZOI) in line with the Suffolk Coast RAMS.
- 10.74 The Neighbourhood Plan area is located within a 13 kilometre “Zone of Influence” (ZOI) of the Stour and Orwell Special Protection Area (SPA) and Stour and Orwell Estuaries RAMS. In addition, the ZOI for the Deben Estuary SPA and Ramsar site overlaps with the Neighbourhood Plan area. Unless mitigated against, Natural England considers that additional residential development within the ZOIs could have a detrimental impact on the designations due to an increase in residential trips. Natural England advises that consideration of ‘off-site’ measures (i.e., in and around the relevant European designated site(s)) is required as mitigation for predicted recreational disturbance impacts.
- 10.75 The RAMS policy “may be deployed to minimise negative impact upon wildlife while ensuring that residents and visitors alike can continue to enjoy all the benefits of this high-quality recreational resource.” This would involve a developer contributing financially to the mitigation strategy for conservation.
- 10.76 The NPPF advocates that local plans should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity or geological value and minimising impacts on and providing measurable net gains for biodiversity: “proposals that would result in significant effects on these sites, either alone or in combination with other plans and projects, should be refused, unless mitigation measures can be applied to avoid adverse effects on site integrity. Only in exceptional circumstances where there are ‘imperative reasons of overriding public interest’ would development that causes harm to a SPA, SAC or Ramsar sites be permitted.”
- 10.77 In Policy LP18 (Nov 2020) BMSDC [2] state that: *“Development should .. protect designated and, where known, potential designated sites. Proposed development which is likely to have an adverse impact on upon designated and potential designated sites, or that will result in the loss or deterioration of irreplaceable habitats (such as ancient woodland and veteran/ancient trees) will not be supported.”* Holbrook parish contains many such designated sites such as the ancient woodlands to the north of the village, the AONB and its Additional Project Area, the SSSI to the west, and the Ramsar designated Heritage Coast to the South.

- 10.78 The Valued Landscape Assessment (AFA 2020) [7] noted that: “Conservation interest is associated with the ancient woodlands which are designated County Wildlife Sites. These woods contain notable veteran trees and deadwood habitats which support a valued population of stag beetle. Alton Water is valued for its nature conservation and is designated a County Wildlife Site for its mosaic of habitats and supports a wide variety of birdlife.”
- 10.79 Over 95% of local residents who responded to the parish survey stated that they agreed or strongly agreed that the views, footpaths, and local landscape should be protected from further development [6].

Supporting Evidence

- [1] NPPF (2021) Section 15
 [2] BMSDC JLP (2020) policy LP16
 [8] Suffolk Coasts and Heaths Management Plan 2018-2023
 [7] AFA Valued Landscape Assessment 2020
 [6] Holbrook Parish residents survey 2019

Link to objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

HNP 13: Biodiversity

All development proposals should avoid the loss of, or substantial harm to biodiversity habitats including but not limited to important trees, ponds hedgerows, woodlands, meadows, and other semi natural habitats in the parish.

Where such losses or harm are unavoidable, adequate mitigation measures or, as a last resort, compensation measures will be sought. If suitable mitigation or compensation measures cannot be provided, then planning permission should be refused.

Otherwise acceptable development proposals that deliver biodiversity gains will be supported. Examples may include:

- i) the creation of new natural habitats, including ponds,
- ii) ii) planting additional native species of tree(s) and/or hedgerow(s) which reflect the character of the area,
- iii) restoring and reconnecting fragmented habitats,
- iv) installing swift and/or bat bricks or boxes; where such measures are located for optimum effectiveness/success
- v) hedgehog friendly fencing to enable hedgehogs and other small mammals, amphibians etc. to move freely

The extent of any net gain in biodiversity should be in accordance with national policy.

Where a new access is created, or an existing access is widened through an existing hedgerow, a new hedgerow of native species shall be planted on the splay returns into the site to maintain the appearance and continuity of hedgerows in the vicinity.

Recreational disturbance Avoidance and Mitigation

All residential development within the Zones of Influence (ZOI) of European sites will be required to make a financial contribution towards mitigation measures, as detailed in the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS),⁵ to avoid adverse in combination recreational disturbance effects on European sites.

For residential development of more than 50 houses within the 13km ZOI of the Stour and Orwell Estuaries SPA and Ramsar site, Natural England's advice is to avoid predicted recreational disturbance at these European sites, and to secure sufficient green space to meet daily recreational needs, as detailed in the Suffolk Coast Recreation Disturbance Avoidance and Mitigation Strategy (RAMS) and relevant supporting information.

HNP 14: Local Green Spaces

Reason for Policy

10.80 The National Planning Policy Framework 2021, at paragraphs 98-103 [1] introduces the concept of Local Green Spaces which can be identified through neighbourhood plans by local communities and allows green areas identified as being of particular importance to be protected. Paragraph 102, sets out 3 broad criteria for identifying and designating such spaces as follows:

‘The Local Green Space designation should only be used when the green space is:

- a) in relatively close proximity to the community it serves
- b) demonstrably special to a local community and holds a particular local significance, for example, because of its beauty, historic significance, recreational value (including as a playing field) tranquillity and richness of its wildlife: and
- c) local in character and not an extensive tract of land’

10.81 The NPPF at paragraph 103 then goes on to state that ‘policies for managing development within a Local Green Space should be consistent with those for green belts’ and therefore affords them a very high level of protection. It is also clear that the designation of Local Green Spaces should not be used as a mechanism to try to block or resist development on agricultural land immediately adjacent to village development boundaries and that a successful designation must meet the criteria outlined above.

10.82 Such spaces can be viewed locally as equally as important as the landscape setting of an area. Such spaces are green spaces found within the built-up area that contribute to the character of a settlement. These can vary in size, shape, location, ownership and use but such spaces will have some form of value to the community and help define what makes that specific settlement what it is. There is good evidence which supports the view that the presence of green spaces around developments is beneficial for mental health.

10.83 Holbrook’s Green Spaces are very important for the community’s health and wellbeing, as well as supporting the village eco-systems. The Village Hall, Green and Reade Field are used regularly for social gatherings, special occasions, sports, and everyday recreation for residents of all ages and generations. It is important to make green spaces and facilities accessible to residents with limited mobility through the inclusion of benches and well-maintained paths etc. These green spaces serve as important visual amenities, contributing to Holbrook’s rural charm and character. A welcome relief from continuing lines of housing which prevents an unwanted urbanised feel to the village. As an example, in the case of the green space between Butcher’s Corner footpath and Hunterswood, Ipswich Road. This piece of privately owned land has a rich biodiversity with many trees, shrubs, and hedgerows, providing important habitat for mammals, birds, and insects. Contributing greatly to Holbrook’s eco-systems. It is a wonderful green space giving Ipswich Road a welcome relief from the continuing contour of housing.

⁵ See Habitats Sites Mitigation, Suffolk Coast Recreational disturbance Avoidance Mitigation Strategy (RAMS), <https://www.babergh.gov.uk/planning/planning-policy/adopted-documents/babergh-district-council/habitats-mitigation/>

- 10.84 The Neighbourhood Plan recognises that in many instances green space and rights of way combine to provide attractive routes for commuting, access to services and facilities, leisure routes, and also improve access for people with mobility issues. They also encourage people to be fit and healthy by providing convenient, free, and low-cost, and attractive opportunities for being active. Suffolk County Council's Green Access Strategy (2020-2030) sets out the council's commitment to enhance PROW, including new linkages and upgrading routes where there is a need. The strategy also seeks to improve access for all and to support healthy and sustainable access between communities and services through development funding and partnership working.
- 10.85 All Saints Church and the Churchyard itself is a focal point of the village. Again, rich in biodiversity with trees, plants, hedgerows, and natural habitat for much wildlife. Particularly bees which frequent the hives. Vitally important for bee numbers and their survival. Holbrook Academy and Primary School playing fields are extremely important for the health and wellbeing of students. Many different activities can be played year-round, enabling students to express themselves in their favourite sports. Important for their health, fitness, and education.
- 10.86 The village allotments are valued green spaces good for residents' health, wellbeing, and happiness. The allotments supply many fresh fruits and vegetables and are also, a great resource for nature.
- 10.87 In the Parish consultation questionnaire [6] residents responded to: "I would like to have more sports and leisure facilities in Holbrook" 59.93% Strongly Agree/Agree which confirms that the majority of the community value Reade Field and the school playing fields as important green spaces to protect. When asked "If the Village Hall is important to Holbrook?" This would include the village green it is situated in. 94.82% Strongly Agree/Agree. When asked "Is the Church important to Holbrook?" Overwhelmingly residents responded 95.15% Strongly Agree/Agree. Also, the community answered an emphatic 99.61% Strongly Agree/Agree to the question, "I value the historic buildings and their settings in Holbrook". [6].
- 10.88 All Local Green Spaces have been assessed against the NPPF criteria and the results of the assessments are in Appendix B – Holbrook Neighbourhood plan area.

Supporting evidence

- [1] NPPF (2021) Section 8
[6] Parish Questionnaire (2019)

Link to objectives:

Objective 1: To seek to establish and maintain for a sustainable future a balance between housing, recreational growth, and the environment.

Objective 2: To conserve and enhance the unique special character and landscape of the Parish and ensure that it does not coalesce with neighbouring villages / Parishes.

Objective 3: To respect the existing Areas of Outstanding Natural Beauty, heritage and nature conservation assets that typify the character of the Parish.

Objective 4: To determine the requirement of the right type of homes, of the right tenure, in the right place that meets the needs of our community, in areas that are the most appropriate in terms of their impact on the village, and that provide for the potential number of homes that would satisfy the requirements in the emerging Babergh / Mid-Suffolk Joint Local Plan.

POLICY

HNP 14: Local Green Spaces

The following are identified as Local Green Spaces and are identified on the map as shown in **Figure 18** and in **Appendix C**

1. Reade Field
2. Village Hall Green
3. Land between Butchers Corner Lane and Hunterswood, Ipswich Road.
4. All Saints Churchyard.
5. Holbrook Academy playing fields.
6. Holbrook Primary School playing field.
7. Allotments behind All Saints Church.
8. Alton Green
9. Shore path (Holbrook Mill Stream)
10. Hales Grove
11. Clifton Wood

Development in the local green spaces will be consistent with national policy for Green Belts

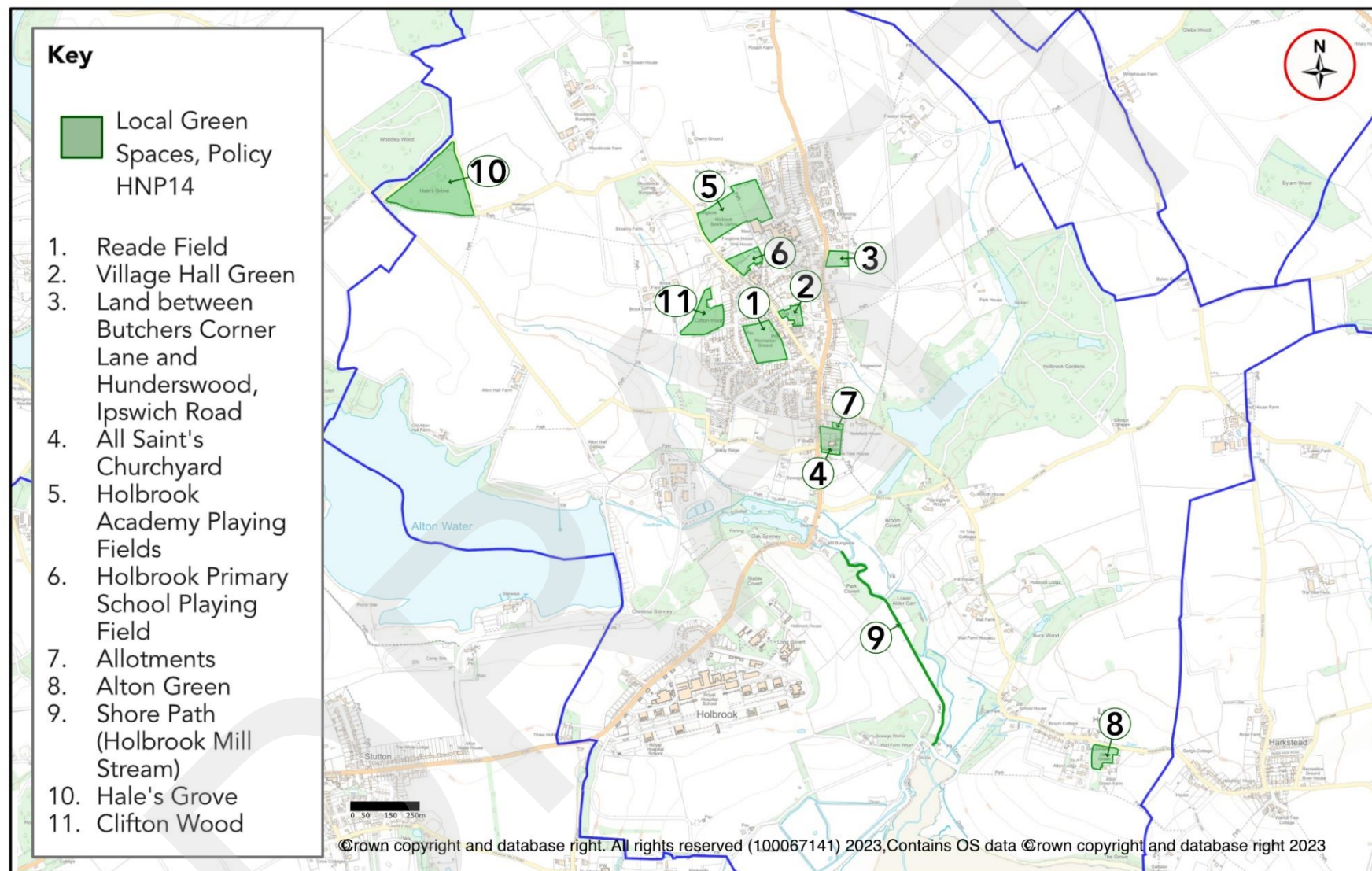


Figure 18: Local Green Spaces

11 COMMUNITY ASPIRATIONS

11.1 During the community engagement, a number of issues and concerns arose that were of importance to local residents. These do not relate to land-use planning matters but are recorded in the table below as 'Community Actions' that could be explored in the future to ensure that they are addressed. This section is separate from the policies above to avoid any confusion.

	Community Aspiration	Commentary	Lead organisation
HNC01	To improve the street scape through avenue planting and opening up views to open water such as the River Stour and Alton Water. To improve hedgerows along field margins. Plant new areas of woodland and vegetation to screen the main village from inter-visibility with Woolverstone and Harkstead. To conserve and enhance to ancient woodlands to the north of the Parish. To protect wildlife and endangered/protected species.	BMSDC JLP policies and Holbrook Parish Questionnaire all highlight the need to protect and retain the landscape, setting and tranquillity of the Parish. Based on AFA (2020) report recommendations to preserve the special character of the Parish. All planting will be the right tree in the right place as promoted by the Woodland Trust.	HPC
HNC02	To protect the landscape, environment and habitats through active management and enrichment of biodiversity.	To continue to work closely with the Suffolk Coasts and Heaths AONB team to protect and enhance the local landscape.	Suffolk Coasts and Heaths AONB/HPC
HNC03	To prevent dog fouling	To ensure that recreational areas and footpaths within the Parish are kept clean and free of dog fouling.	HPC

HNC04	a) To improve the quality and function of local highways e.g., Freston crossroads, road surfaces, banks, and kerbside edges. b) To pressurise the Highways Authority to restrict the HGV traffic from A137 via the B1080 and the Village of Stutton & Holbrook.⁶	Parish Council to work with the SCC Highways dept.	SCC / HPC
HNC05	To improve public transport	Work with SCC to explore options for improving public transport so that sufficient buses run at times to serve the local population needs.	HPC / SCC
HNC06	To refurbish Holbrook Village Hall	To create a more attractive central hub within the village to enable community groups to meet to enhance the well-being of the Parishioners of Holbrook.	HPC
HNC07	To create new footpaths and cycle paths both within the village and on routes into Ipswich and adjacent settlements.	There has been a campaign on the peninsula for many years to create new cycle routes to encourage more people to cycle. This needs to be continued and seen through to fruition.	SCC / HPC
HNC08	To improve parking arrangements in the Parish	To prevent inconsiderate parking and traffic jams. To provide designated spaces so that people can go shopping, attend churches, community groups and visit friends/relatives. Ensure that Holbrook is visited by the appropriate agency to enforce the national ban on parking on pavements.	SCC/HPC

⁶ The County Council will be undertaking a county-wide review of HGV movement routes. Community views are currently being sought and we would recommend the parish highlights this concern at the link in the footnote, so that it is captured in the review.

HNC09	To reduce the level of light pollution and improve the street lighting where safety is an issue.	Work with Suffolk County Council Highways Lighting initiatives.	SCC/HPC
HNC10	To have fibre Optic and mobile coverage for the whole of the Parish which will support the changes to working practices we are currently seeing.	Making new houses ready to accept Fibre is a Government policy https://www.gov.uk/guidance/building-digital-uk#current-mobile-infrastructure-projects it has a spin off "Shared Rural Networks ".	SCC/HPC
HNC11	To ease and improve the traffic flow and parking within the Parish, particularly to support the local schools. Reduce the speed limit along Ipswich Road to 20mph near to Holbrook Academy.	School drop-off and pick-up times create obstructions to both the highway and pedestrians, in addition to parking problems for parents. New solutions need to be found.	HPC/Holbrook Academy / Holbrook Primary School

12 MONITORING AND REVIEW

- 12.1 Whilst there is currently no statutory requirement to monitor the Neighbourhood Plan, it is good practice to do so. A formal review process in consultation with the local community and the District Council should be undertaken at a minimum of every five years, to ensure that the Plan is still current and remains a positive planning tool to deliver sustainable growth.
- 12.2 In order to determine when a review is necessary, the District and Parish Councils will monitor development in Holbrook along with the local and national policy and legislative context.
- 12.3 Any new sites that are put forward and/or planning applications and/or housing development within the Parish of Holbrook will be noted during the lifetime of the plan in order to inform subsequent versions.
- 12.4 The Parish Council will report at the Annual Parish Meeting on the implementation of policies, and the progress made on taking forward any Community Actions including details for their implementation.

13 APPENDIX A – HOLBROOK NEIGHBOURHOOD PLAN WORKING GROUP MEMBERS

John	Ambrose	(Vice Chair of Neighbourhood Plan Working Group and Chair of Holbrook Parish Council)
Mike	Braybrooke	Local resident
Terence	Gray	Local resident
Louise	Helliker	Local resident
Marek	Pawlewski	(Chair of Neighbourhood Plan Working Group)
Sarah	Pawlewski	Local resident
John	Williams	Local resident

Consultant Support: Andrea Long, Compasspoint Planning.

The Working Group would also like to thank all of the other people who have helped at various stages in the preparation of the Neighbourhood Plan.

14 APPENDIX B – HOLBROOK NEIGHBOURHOOD PLAN AREA: LOCAL GREEN SPACE JUSTIFICATION

The table below outlines the justification for the inclusion of each Local Green Space identified. The criteria are based on paragraph 102 of the National Planning Policy Framework 2021. Inappropriate development is, by definition, harmful to the Green Spaces and should not be approved except in very special circumstances and the local planning authority should ensure that substantial weight is given to any harm.

	Name of Green Space	In reasonably close proximity to the community it serves?	Is demonstrably special to the local community because of its beauty, historic significance, recreational value, tranquillity, or wildlife value?	Is local in character and not an extensive tract of land?	Comments
1	Reade Field	Yes – lies in the centre of the village, surrounded by housing, and is accessible to the whole community.	Valued for exercise and recreation and the only formal children's play area with apparatus in the village. Widely used for football matches, training, whole village events and social activities. Visible from housing on all sides. Parking close by at Village car parking areas	1-2 acres	Sports pitches and play equipment which has been recently upgraded. Planned upgrade to the pavilion.
2	Village Hall Green	Yes – lies at the centre of the village directly adjacent to the village hall	Used annually for the village fete and throughout the year for informal exercise and recreation. Readily accessible by the public and visible from the road and from adjacent housing. It has important recreational and social value and has been significant in the history of the village.	< 1 acre	Easily accessible from the village centre on foot.

	Name of Green Space	In reasonably close proximity to the community it serves?	Is demonstrably special to the local community because of its beauty, historic significance, recreational value, tranquillity, or wildlife value?	Is local in character and not an extensive tract of land?	Comments
3	Land between Butchers Corner lane and Hunterswood, Ipswich Road.	Yes - Less than 0.5km from the centre of the village. Ipswich Road side there are dwellings opposite, dwellings on the North & South side, a field with a footpath on the East side opposite the road.	A beautiful, tranquil space. Has a very high amenity value. Gives a welcome relief from the continuing contour of housing. Tall trees & hedgerows edge all four borders. Trees, bushes & shrubs within. Rich in biodiversity. A wildlife corridor, home to mammal species, birds & insects. Views in from Ipswich Road & the field footpath opposite.	Approx 1.5 Acres	An important green space & eco system. Contributing to maintaining the rural character of the village. It is outside the settlement boundary.
4	All Saints Churchyard.	Yes – Less than 0.5km from the centre of the village.	Medieval, historical and community value. Tranquillity close to the centre of the village. Very peaceful, well-wooded, secluded place for quiet contemplation.	Approx. 1 acre	Easily accessible from the village centre on foot.

	Name of Green Space	In reasonably close proximity to the community it serves?	Is demonstrably special to the local community because of its beauty, historic significance, recreational value, tranquillity, or wildlife value?	Is local in character and not an extensive tract of land?	Comments
5	Holbrook Academy playing fields.	Yes – Less than 0.5km from the centre of the village.	Large open space used for sports matches, fireworks shows and school events. Used during the week by the school and at weekends by the local community. Public footpath runs across the middle of the field and connects properties along Woodlands Road to the centre of the village. Enclosed with hedges, trees, and fences.	Approx. 10 Acres	Sports pitches for cricket & football regularly used by school & local community. Holbrook Academy playing fields are extremely important for the health and wellbeing of students. Many different activities can be played year-round, enabling students to express themselves in their favourite sports. Important for their health, fitness, and education.
6	Holbrook Primary School playing field.	Yes – Less than 0.2km from the centre of the village.	Large open green space used by the school daily for recreation and sports. Open to the public during school sports events and school fete. “The Hollow” has been designated by the school as a forest school area with a pond / woodland used by the children. Enclosed with hedges, trees, and fences. Also contains a willow crown.	Approx. 2.5 acres	Significant biodiversity assets within the school grounds in addition to sports field and play areas. <i>Cont.</i>

	Name of Green Space	In reasonably close proximity to the community it serves?	Is demonstrably special to the local community because of its beauty, historic significance, recreational value, tranquillity, or wildlife value?	Is local in character and not an extensive tract of land?	Comments
					Holbrook Primary School playing fields are extremely important for the health & wellbeing of students. Many different activities can be played year-round, enabling students to express themselves in their favourite sports. Important for their health, fitness, and education.
7	Allotments behind All Saints Church.	Yes –in key points in the village such as behind parish church.	The village allotments are valued green spaces good for resident's health, wellbeing, and happiness. Supplying many fresh fruits and vegetables. Also, a great resource for nature.		Current allotments are behind the parish church.
8	Alton Green	Yes 2.2km S. East Holbrook and central for lower Holbrook	Uncultivated land in Lower Holbrook which is registered common land and contains a pond. Maintained by Holbrook Parish Council and is subject to the protection of the local authority (HPC) under sec. 9 of the Common registration Act 1965 section 9. <i>Cont.</i>	2+ acres	Regularly maintained by the Community and seen as a community asset and aesthetically important.

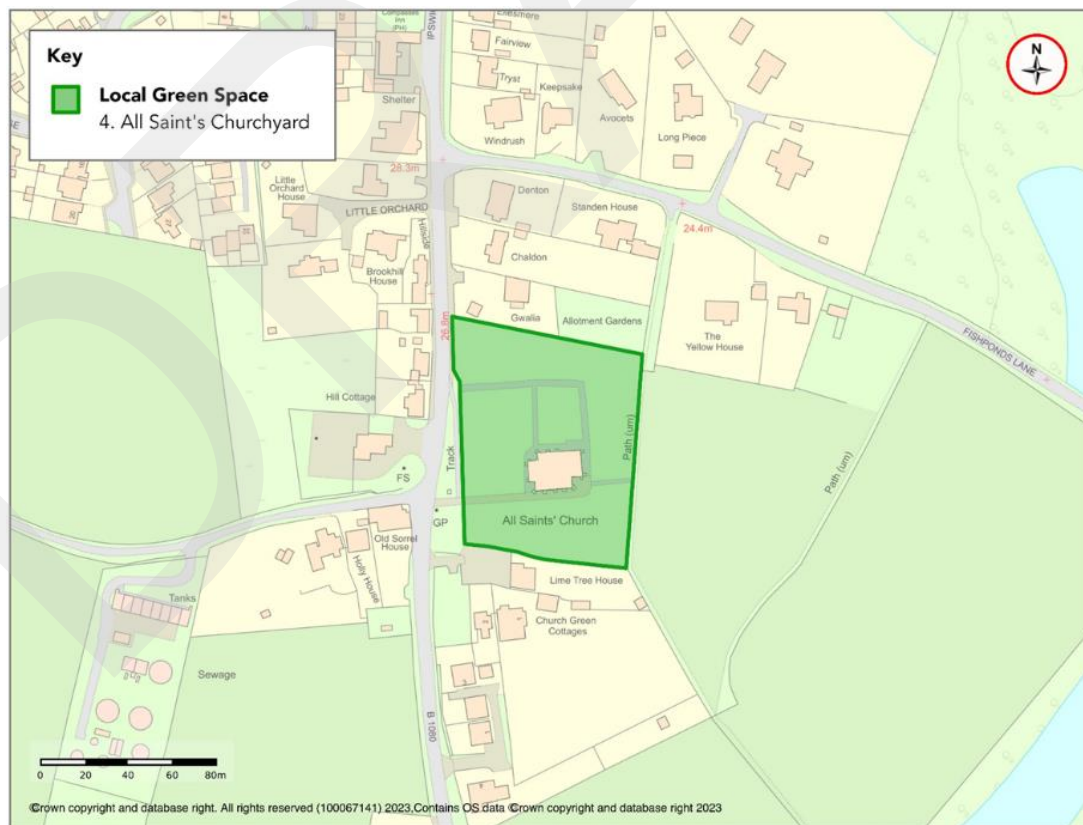
	Name of Green Space	In reasonably close proximity to the community it serves?	Is demonstrably special to the local community because of its beauty, historic significance, recreational value, tranquillity, or wildlife value?	Is local in character and not an extensive tract of land?	Comments
			Of considerable recreational and amenity value. An open space for wildlife and birds of many descriptions.		
9	Shore path (Holbrook Mill Stream)	Yes - Approx 1 Km from the centre of the village. Very accessible on foot. The footpath starts just past the Mill House, bottom of Church Hill & ends at the Mill Stream Sluice, Holbrook Bay.	The Mill Stream is part of an ancient landscape rising west of Holbrook in the valley farmlands of Tattingstone. The valley was flooded to create Alton Water reservoir between 1974 and 1987. The current mill is of 18th / 19th century construction. To begin the stream meanders around and past bungalows through tiny, wooded glades. Once downstream from the mill the stream crosses the water meadows of lush grasses and is occasionally forded by ancient stone / brick farmer's bridges. Very special to the local community & visitors. A beautiful part of the village. An area of very high amenity & recreational value. The distant landscape is of soft valley slopes with an occasional view of boat masts accompanied by the rhythmic tapping of the rigging. <i>Cont.</i>	Approx 1 Km in length. Linking the village to Holbrook Bay & the Creek.	Sits within the AONB. Rich in biodiversity. A very important ecosystem. Home to many wildlife species including, Barn Owls, Bats, Kingfishers & Herons.

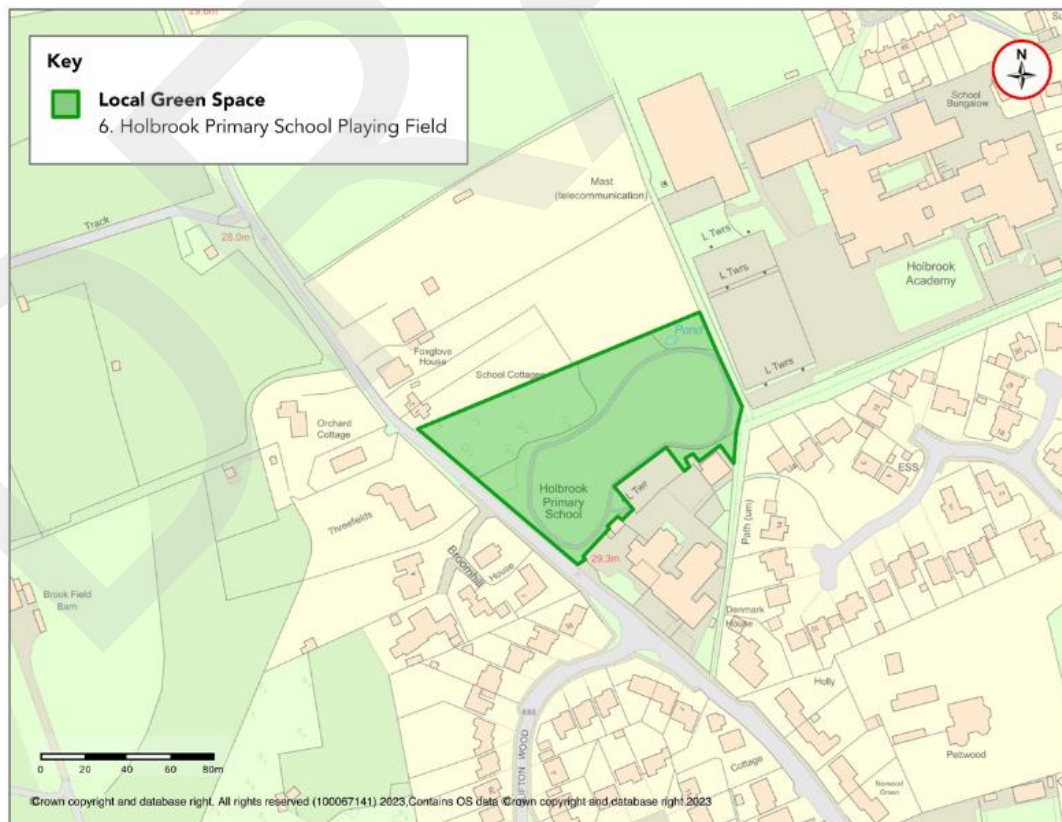
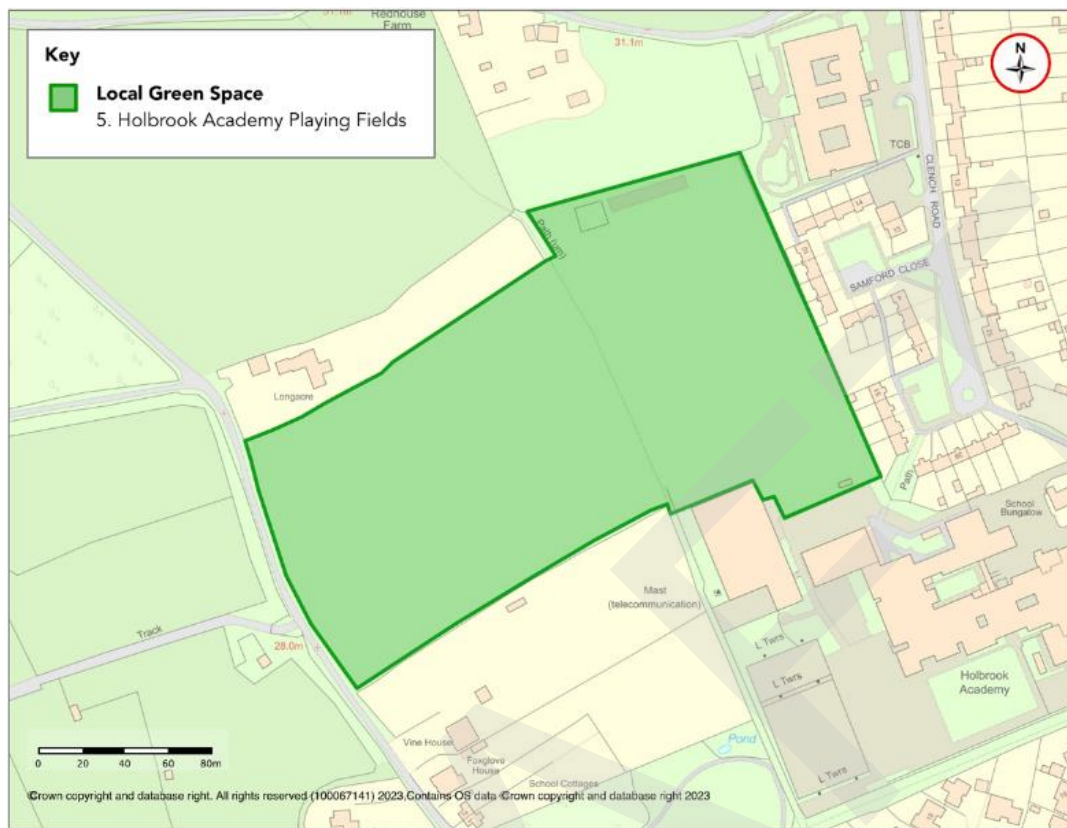
	Name of Green Space	In reasonably close proximity to the community it serves?	Is demonstrably special to the local community because of its beauty, historic significance, recreational value, tranquillity, or wildlife value?	Is local in character and not an extensive tract of land?	Comments
			The stream path is used for general leisure, watching nature & dog walking. A very peaceful, tranquil, attractive rural setting. Fine picturesque views across rolling hills of grazing sheep, goats & meadow land. Much woodland & reed beds line the stream.		
10	Woodley Wood / Hales Grove	Yes - The Wood lies between Holbrook and Tattingstone Parish Councils but is an amenity utilised by both residential groups. It is 1.5km NW of Holbrook centre.	Woodley Wood is a mixture of maturing trees with a variety of fauna and flora. Within the Wood there is usually an abundant wildlife including, at times, packs of deer. The most spectacular sightings are buzzards, rooks, and jackdaws. At dusk there are also owls hunting across the broad-leaved woodlands and adjacent arable fields.	12 acres	Whilst semi remote from the local conurbations the area provides a peaceful habitat for wildlife. A secluded woodland venue for walkers using the many footpaths. A narrow Lane traverses the Wood which through history has linked the local communities.

	Name of Green Space	In reasonably close proximity to the community it serves?	Is demonstrably special to the local community because of its beauty, historic significance, recreational value, tranquillity, or wildlife value?	Is local in character and not an extensive tract of land?	Comments
11	Clifton Wood	Yes - 0.25Km West of Holbrook centre bounding numerous properties to the East and West	A mixture of mature trees and an important settlement boundary providing a high visual and mental amenity. A place of beauty with flora, fauna and a habitat for wild animals including many bird raptor species.	4 Acres	Forms a visual screen to surrounding properties and enhances the valley side agricultural landscape. Provides a peaceful and well wooded secluded place of high wildlife value.

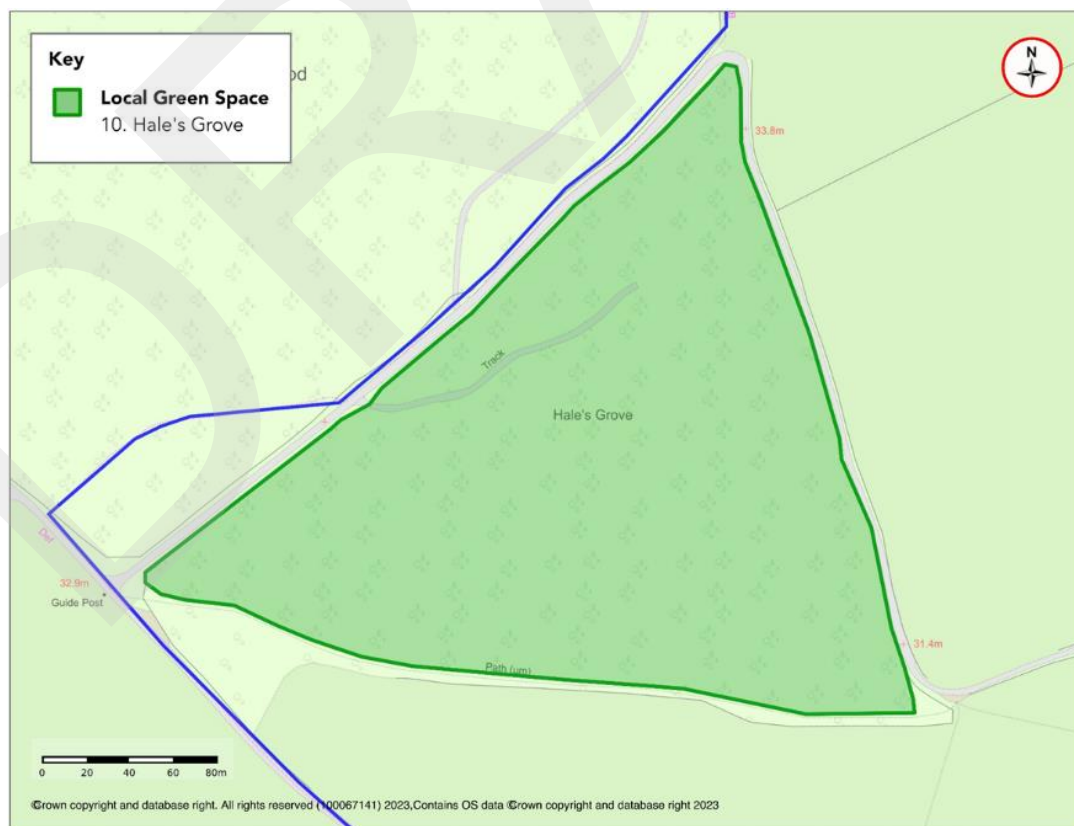
15 APPENDIX C - LOCAL GREEN SPACE INDIVIDUAL MAPS













16 APPENDIX C – GLOSSARY

Affordable Housing	Social rented, affordable rented and intermediate housing provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.
Allocation	An area of land identified for development in a development plan. The allocation will specify the type of development that will be permitted on the land.
Biodiversity	The whole variety of life encompassing all genetics, species and ecosystem variation including plants and animals.
Community Facilities	Facilities providing for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community.
Conservation Area	An area of special architectural or historic interest, designated under the Planning (Listed Buildings & Conservation Areas) Act 1990, whose character and appearance is protected.
Density	Measurement of the number of dwellings per hectare and often in equivalent dwellings per acre.
Development	Development is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over, or under land, or the making of any material change in the use of any building or other land." Most forms of development require planning permission.
Greenfield Site	Land that has not previously been used for urban development. It is usually land last used for agriculture and located next to or outside existing built-up areas of a settlement.
Habitat	The natural home of an animal or plant often designated as an area of nature conservation interest.
Infrastructure	Basic services necessary for development to take place, for example, roads, electricity, sewerage, water, education, and health facilities.

Landscape Character Assessment	A tool to identify and understand the factors that give character to the landscape and to help inform policy and decisions about how the landscape may change in the future.
Listed Building	A building or other structure of Special Architectural or Historic Interest. The grades of listing are grade I, II* or II.
Local List	A list of buildings identified for their local historic, architectural, or cultural contribution to the character of an area. The Local List is compiled and adopted by the Local Planning Authority. See also Non- Designated Heritage Assets.
Local Green Space	An area of green space that is demonstrably special to a local community by way of its beauty, historic significance, recreational value, tranquillity, or richness of its wildlife (see NPPF 2018 paragraph 100).
Local Plan	The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies which under the regulations would be considered to be development plan documents, form part of the Local Plan. The term includes old policies which have been saved under the 2004 Act.
Nature Conservation	The protection, management, and promotion of wildlife habitat for the benefit of wild species, as well as the communities that use and enjoy them.
National Planning Policy Framework (NPPF)	The NPPF forms the national planning policies that Local Planning Authorities need to take into account when drawing up their Local Plan and other documents and making decisions on planning policies. The NPPF is published by the Department of Communities and Local Government.
Neighbourhood Plans	A Plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).
Non-Designated Heritage Asset	These are buildings, monuments, sites, places, areas, or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'.

Open Space	Open space is defined in the Town and Country Planning Act 1990 as 'land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground'. Open space should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes, and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity.
Protected Species	Plants and animal species afforded protection under certain Acts of Law and Regulations.
Site of Special Scientific Interest (SSSI)	A SSSI is identified by Natural England as requiring protection from damaging development on account of its flora, fauna, geological and/or physiological features.
Sustainable Development	Meeting peoples' needs now, socially, environmentally, and economically, without jeopardising the needs of future generations. There are three dimensions to sustainable development as seen in paragraph 7 of the NPPF: - economic contributing to a strong, competitive economy; - social-supporting strong, vibrant, and healthy communities and – environmental contributing to protecting and enhancing the natural, built, and historic environment.

Acronyms:

AECOM	International consultancy firm commissioned by Locality to provide technical support.
AONB	Area of Outstanding Natural Beauty
APA	Additional Project Area
BMSDC	Babergh and Mid Suffolk District Councils
BMSDC JLP	Babergh and Mid Suffolk District Council Joint Local Plan
CWS	County Wildlife Site
Ha	Hectare
Heritage Coast	Areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors (as defined by the NPPF, 2019, p67)
HNPA	Holbrook Neighbourhood Plan Area
HNP	Holbrook Neighbourhood Plan
HPC	Holbrook Parish Council
JLP	Joint 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
RAMS	Recreational disturbance Avoidance and Mitigation Strategy
RHS	Royal Hospital School
SHELAA	Strategic Housing and Economic Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SSSI	Site of Special Scientific Interest
TPO	Tree Preservation Order

17 REFERENCE SOURCES

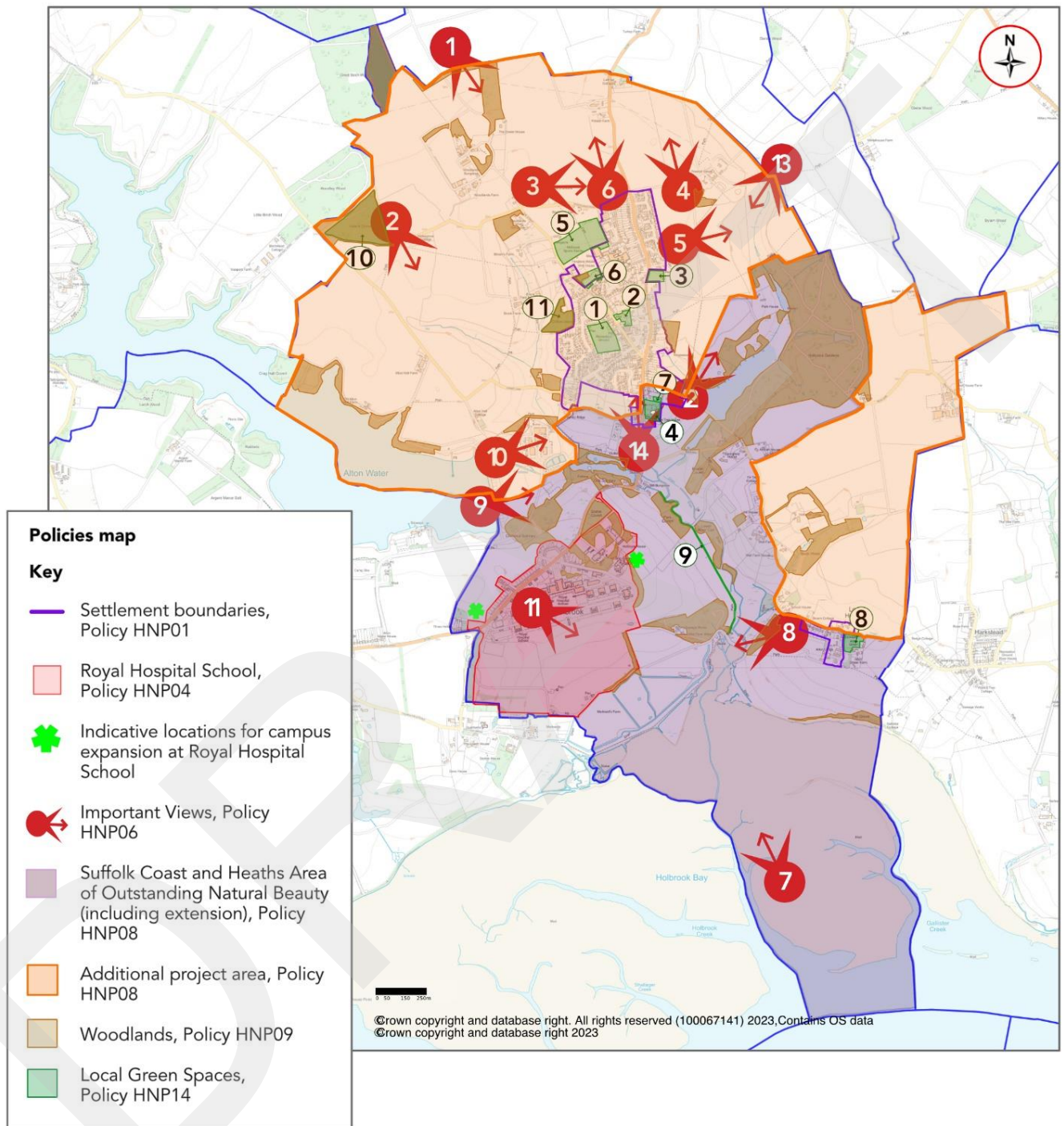
All Supporting Documents are available on the neighbourhood plan section of the Holbrook Parish Council website.

(Web sites accessed 01 September 2021):

- [1] NPPF (2021): <https://www.gov.uk/guidance/national-planning-policy-framework>
- [2] Babergh Mid Suffolk District Council Joint Local Plan (2020):
<https://www.babergh.gov.uk/assets/Strategic-Planning/JLPExamination/CoreDocLibrary/JLP-Core-Document-Library-live.pdf>
- [3] Babergh District Council Core Strategy Documents:
<https://www.babergh.gov.uk/planning/planning-policy/adopted-documents/babergh-district-council/>
- [4] Supporting Document: AECOM Site Options Assessment (2019):
<https://holbrook.suffolk.cloud/neighbourhood-plan/>
- [5] Supporting Document: AECOM Housing Needs Assessment (2020):
<https://holbrook.suffolk.cloud/neighbourhood-plan/>
- [6] Supporting Document: Holbrook Parish Questionnaire (2019):
<https://holbrook.suffolk.cloud/neighbourhood-plan/>
- [7] Alison Farmer Associates Valued Landscape Assessment (2020):
<https://holbrook.suffolk.cloud/neighbourhood-plan/>
- [8] Suffolk Coast and Heaths AONB management Plan (2018-2023):
<https://www.suffolkcoastandheaths.org/managing/planning/>
- [9] Suffolk Landscape Character Appraisal <http://www.suffolklandscape.org.uk/>
- [10] Infill Definition - BMSDC JLP (2019) Policies LP01:
<https://www.babergh.gov.uk/assets/Strategic-Planning/JLP-Reg18-2019/BMSDC-Joint-Local-Plan-July-2019-Part-2-Local-Policies.pdf>
- [11] Suffolk Coasts & Heaths AONB: "Guidance on the selection and use of colour in development" (2018):
<https://www.suffolkcoastandheaths.org/managing/planning/guidance-for-planning-in-the-aonb/>
- [12] Agricultural Bill now Act 2019-2021: <https://commonslibrary.parliament.uk/research-briefings/cbp-8702/>
- [13] Place Services Heritage & Settlement Sensitivity Assessment for Babergh and Mid Suffolk District Councils (2018): <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/Current-Evidence-Base/Heritage-and-Settlement-Sensitivity>
- [14] Suffolk Heritage Web site: <https://heritage.suffolk.gov.uk/>

- [15] Suffolk County Council: www.suffolk.gov.uk/roads-and-transport (Lighting)
- [16] NHS Long Term Plan (2019): chapter on Health and the Environment:
<https://www.longtermplan.nhs.uk/>
- [17] Flood and Water Management Act (2010):
https://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf
- [18] The Suffolk Flood Risk Management Strategy (SFRMS) (2016):
<http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/SFRMS-Summary.pdf>
- [19] Flood Risk Maps: <https://flood-warning-information.service.gov.uk/long-term-flood-risk>
- [20] Obtrusive Lighting SC&H AONB: <https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/03/Position-Statement-on-lighting-in-SCH-AONB.pdf>
- [21] Suffolk Coasts & Heaths AONB Statement about development (2015):
<https://www.suffolkcoastandheaths.org/wp-content/uploads/2020/03/ENDORSED-SCH-AONB-Position-Statement-on-Development-in-Setting-of-AONB-2015.pdf>
- [22] Building Digital UK: <https://www.gov.uk/guidance/building-digital-uk#current-mobile-infrastructure-projects>
- [23] Shared Rural Networks: <https://srn.org.uk/>
- [24] Suffolk Observatory: <https://www.suffolkobservatory.info/wp-content/uploads/2017/09/06-Peninsula.pdf>
- [25] Supporting Document: Publicity Materials:
<https://holbrook.suffolk.cloud/neighbourhood-plan/>
- [26] Supporting Document: Youth Survey: <https://holbrook.suffolk.cloud/neighbourhood-plan/>
- [27] Intergovernmental Panel on Climate Change (IPCC): <https://www.ipcc.ch/>
- [28] Babergh Mid Suffolk Joint Local Plan: Sustainability Appraisal Non-Technical Summary, LUC, 2021: <https://www.babergh.gov.uk/assets/Strategic-Planning/JLPExamination/CoreDocLibrary/A-SubmissionDocs/A02-BMSDC-JLP-SA-Oct20-NTS.pdf>
- [29] Neighbourhood Planning Statutory Instruments 2012 No. 637:
<https://www.legislation.gov.uk/uksi/2012/637/introduction/made>

18 POLICIES MAP (FIGURE 19)



This last page is intentionally blank

DRAFT