



HOLLESLEY PARISH COUNCIL

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Planning Policy and Delivery Team
Suffolk Coastal District Council
East Suffolk House
Station Road,
Melton
Suffolk
IP12 1RT

Dear Planning Policy and Delivery Team,

Subject: Issues and Options Consultation 2017

Introduction

Hollesley Parish Council (HPC) have taken a very active stance to ensuring all residents are aware of this consultation. We have received written representation from 30+ families and have also held a public meeting where over 90 people attended. We therefore feel our views are very much aligned with the majority of our residents.

Our vision for Hollesley

Hollesley residents and HPC fully accept the need for further development to meet the housing shortfall in the country. However, do feel Hollesley has more than assisted with this ongoing task. Over the past 10 years the following new dwellings have be built or have planning permission in the village:

Location	Number of dwellings
Swallows Close	39 (8 Affordable)
Meadow Farm Lane	1
Bushy Lane	4
Heath Dairy (under construction)	9
High Street (under construction)	1
Glebe House (under construction)	9 (3 affordable)
Extension to Mallard Way (Construction likely next year)	16 (5 affordable)
Total	79

We feel this demonstrates Hollesley's willingness to grow in a controlled manner.

HPC recently commissioned a report from Pathfinder Development Consultants to ascertain how many (if any) social houses were needed in Hollesley. The result of this was that, according to their records, a total of 15 more houses available for social letting were needed, 14 of which should be 1 or 2 bedrooms. From the table above we can see that 8 further affordable houses will be built in Hollesley in the next couple of years, leaving a requirement for around a further 7.

Further to considering constructing a Neighbourhood Plan, which HPC will be discussing with our neighbouring parishes in November, we are also exploring the possibility of setting up a Community Land Trust (CLT). This again will be in partnership with our neighbours and we are hoping this will allow us to become part of a project that controls a small parcel of development in the village, to meet the *needs* of the local residents, rather than the *aspirations* of the national developers.

Consultation Comments

We would like to take this opportunity to comment on a number of different aspects of the consultation, in relation to Hollesley:

Area of Outstanding Natural Beauty

Hollesley lies wholly within the Suffolk Coast and Heaths AONB (established in 1970). The village has a unique mix of habitats, marshland, heathland and woodland; and HPC are very keen to see this mix preserved.

We would politely refer you to the following pieces of statute that seek to protect those areas labelled as areas of Outstanding Natural Beauty, as Hollesley is in its entirety:

1. **National Planning Policy Framework (NPPF) – Para 115** “Great weight should be given to conserving 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 landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads”
2. **NPPF – Para 116** “Planning permission should be refused for major developments in these designated areas [AONB’s] except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:
 - a. the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b. the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
 - c. any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”
3. **Countryside and Rights of Way Act 2000 – Section 85(1)** – “In exercising or performing any functions in relation to, ..., land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty”.

In addition we are informed that the Suffolk Coast and Heaths AONB has an inherent value of £198m worth of tourism and other income for the region each year, according to a survey in undertaken in 2016.

Hollesley Parish Council are passionate about protecting our unique and special landscape and we believe the above policies are in place to do this.

We would also like to make a statement about Enabling Development (ED) in Hollesley. We were informed by the Alde and Ore Estuary Partnership that 10 sites were being considered within Hollesley for possible ED (locations not known to HPC). We are now told that these are no longer ‘on the table’ however, we would not want ED to permit development within the village, which would otherwise be considered unsuitable under regular planning rules.

Transportation and Road Networks

In essence there is only one road in and out of the Wilford Peninsula, the A1152 over the Wilford Bridge and through Melton. This 'bottle neck' for all peninsula traffic is presently congested at peak times and further significant increase in the number of houses on the peninsula will render this route unusable at some times.

Furthermore, the bus route through the village is now reduced to one per day (at 7.26am); resulting in virtually all travel off and on to the peninsula by car.

Business and Industry

There are very few businesses or light industry on the peninsula, virtually everyone in work has to travel to Woodbridge, Martlesham, Ipswich and beyond. We feel the building of mass estates on the peninsula is misguided due to the inevitable need for additional travel.

Education

We were advised by Hollesley Primary School Head Teacher that the school is currently under capacity and could take around 25 more children. With the developments currently under construction and planned for next year (and further development in neighbouring villages) we believe this gap will be filled and the viability of retaining a village school will be high.

With the additional 188 houses currently under construction in Melton, this will place great strain on the already full Farlingaye High School and this could result in Hollesley's children having to travel much further afield for secondary education. In addition, the lack of public transport also means that many school children are taken by car to Farlingaye, exasperating the travel issues.

Healthcare

It is correct that Hollesley village does have a doctors surgery. However, this is a satellite surgery from the Mill Hoo Practice in Alderton and only operates on a Monday afternoon (and not on bank holidays). In addition, the facilities at the surgery are limited and many procedures cannot be performed there, resulting in appointments having to be at either Alderton or Orford (a journey of 10 miles).

Furthermore, the nearest Accident and Emergency Hospital is in Ipswich, 14.4 miles and a 30 minute drive away.

Rock Barracks, Sutton Heath

It was reported in November 2016 that Rock Barracks at Sutton Heath (presently home to the 23rd Parachute Engineer Regiment) is to be closed within 10 years, i.e. around 2026. We strongly feel that this facility will make available potentially hundreds of houses, with additional space for further development or even light industry. The future availability of this existing facility should be a prime feature of the Local Plan looking forward to 2036.

Design

Where housing is permitted we would like to see this at the forefront of modern standards in house building. Ecological materials, efficient heating systems and reuse of natural resources should be paramount in the design of new dwellings.

Also important is the design of each property. This should be in keeping with Hollesley's present mix of character houses and not akin to modern cloned estates.

Flooding

Surface Water Flooding (SWF) has a major impact on a number of locations in the village at present. Despite efforts to clear storm drains in recent weeks this has had little impact and flooding of the Shepherd and Dog Public House has occurred

In addition, Hollesley is riven by a water course known as the 'Black Ditch' which is almost all within Flood Zone 3 and erosion of our coastline which flooded as recently as 2013.

Physical Limits Boundary (PLB)

In 2015 Hollesley residents strongly objected to a proposal to alter the PLB of Hollesley to include the hamlet of the Alderton Road and Bushy Lane areas. This resistance is still in place today and we fully support the principle of maintaining a PLB around each village.

Errors in the Documentation

We would like to point out the following errors in your documentation:

1. Page 713 of the 'Sustainability Appraisal Site Assessments' talks about Site 542 and then jumps back to Site 532
2. All the Hollesley sites listed on the 'Initial Sustainability Appraisal Site Assessments' document claim to be within "...0.1 miles from Hollesley Village Hall Branch Surgery and 6.5 miles from the nearest hospital". The statement regarding the Branch Doctors Surgery may be correct for Site 563 but not for any of the others. It is also misleading to claim there is a 'branch surgery' as this is only in operation on a Monday afternoon (outside all Bank Holidays). With reference to the proximity of the nearest hospital, Ipswich Hospital is the closest and this is **12.3 miles** from the site at the most westerly point of the village (Site 323) and **14.4 miles** from the furthest site (Site 1026).
3. The Map used for Hollesley is very out of date. It shows Mills Scrap Yard off Tower Hill Road which has been Swallows Close for over 4 years

Potential Land for Development

It is noted that virtually all sites in Hollesley are identified (in the 'Initial Sustainability Appraisal Site Assessments' document) as having the following negative attributes:

- **Quality and Local Distinctiveness of Location** – ALL sites are within the Suffolk Coast and Heaths AONB (see paragraph above)
- **Air quality** – Development likely to result in an increase in emissions through increases in associated traffic movements
- **Waste management** – Likely to result in an increase in waste production
- **Greenhouse gases** – Overall emissions in the District could rise as a result of an increase in development
- **Safeguard of the coast and estuaries** – Potential impact from increased recreational pressure on the estuary

In addition we would like to offer the following comment on the 18 sites identified in the document for potential development in Hollesley:

Site Number	Description of Site	Comments (from Hollesley Parish Council, Hollesley Residents and taken from the 'Initial Sustainability Appraisal Site Assessments' document)
35	Land adj. to Beechview, Rectory Road	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Quality of where people live and work – This site is on the edge of the village and a key area of the AONB where livestock farming is presently undertaken • Flooding – Some SWF risk along the northern edge of the site • Enhancement of biodiversity and geodiversity – Trees and hedges are located along the southern and eastern boundaries of this site which may be of biodiversity value. This site is located close to known habitats of protected species including the House Sparrow • Highways – There is currently no access road. Access on to Rectory Road would be at a narrow point in the road • Holistic View – this site, along with existing planning permission and 264, are developments that will not result in an integrated increase to housing maximising the housing and amenity space and integration with the village
69	Land at and surrounding Walden, Fox Hill	<ul style="list-style-type: none"> • This land already has planning permission for one house, which is in the process of being built, therefore this plot should be removed from the plan
264	Land at Lyndhurst, Rectory Road	<ul style="list-style-type: none"> • Enhancement of biodiversity and geodiversity – Trees and hedges located at this site may be of biodiversity value • Areas of historic and archaeological importance – The site may have archaeological importance • Holistic View – This site, along with existing planning permission and 35, are developments that will not result in an integrated increase to housing maximising the housing and amenity space and integration with the village

272	Land surrounding Meadow Park Livery, Alderton Road	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Conservation of soil and mineral resources – Site in agricultural use. Potential loss of high quality agricultural land. • Past planning history – Many parcels of land in this area have all been refused planning permission by SCDC in the past (e.g. C/02/0871) • This area is high ground and therefore any development would be highly visible • This plot already has permission for one house, currently under construction • The site is not well integrated (access via dirt road) and the road is single dirt lane in flood area which is unsuitable for emergency vehicles
323	Land west of Manor Farm	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Access to this site is via a single unmade track • Entrance to the access track is on a bend where at least 2 accidents have been recorded in the past 10 years • This is prime agricultural land and should remain as such • Hollesley has 2 existing camp sites to accommodate tourism in the village • This field is known for the Cud Weed in it, as recoded by the National Biodiversity Network • This area of Hollesley is one of a few areas where people can experience wilderness and it is the reason people come. This is a major part of the AONB and a mixture of forest and heathland habitats
398	Land at Meadow Farm, Meadow Farm Lane	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Flooding – Part of the site is within FZ 2 and it regularly floods • Highways – The site is accessed via a track • The site is not well integrated (access via dirt road) and the road is single dirt lane in flood area which is unsuitable for emergency vehicles
443	Land east of Fourways, Alderton Road	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Highways – The site is not accessible via the road but via a track and access/egress to and from the site is very dangerous • Wildlife – this is an area of outstanding wildlife habitats and there is abundant evidence of rare species • This area is outside of village envelope and is poorly integrated with the main village
466	The Orchard, School lane Hollesley. (off Hollesley school drive)	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Enhancement of biodiversity and geodiversity – Trees and hedges located at this site may be of biodiversity value • Highways – The site is accessible via a single track which may not be suitable to accommodate development • Currently the site is not suitable for development but if a safe entrance and exit can be found it may be. The present proposals (DC/17/1981/OUT – <i>Refused</i> and DC/17/4386/OUT – <i>under consideration</i>) both suggest traffic exiting on to the School Drive which is totally unacceptable

477	Meadow Park Livery Stables, Alderton Road	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Flooding – Site sits partially within FZ 3 and has some SWF risk • Highways – The site is accessible via a single track which at present is not suitable to accommodate development • This borders an area where rare moth nesting has been recorded • Past planning history - Many parcels of land in this area have all been refused planning permission by SCDC in the past (e.g. C/02/0871)
532	Land fronting Rectory Road	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Flooding – Small portion of this site is at risk from SWF • Biodiversity and geodiversity – Trees and hedges located at this site do have a great biodiversity value • The site would bring unwanted street lights and noise to a very quiet area of the village • There is a current and long history of agricultural use on this site
542	Tower House, Tower Hill Road	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Flooding – a large portion of the site is at risk of SWF • Highways – The site is not accessible via the road • This land provides a prolific wildlife corridor amongst the housing in this area, including evidence of dormice • Access to this site would probably be on to Tower Hill, a very tight and awkward junction with very limited visibility. • This site will incur issues connecting to sewer networks given parts of the site lie below level of existing sewer
563	Land opposite Moorlands	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Flooding – Site may be vulnerable to SWF to the south • Quality and Local Distinctiveness of Location – Site is close to a Special Protection Area • Although this site is a haven for much wildlife (snakes, owls, etc.) it may be suitable for development as long as the very large oak trees to the east are protected and the development is set back to allow the existing hedge line to be retained; this is the first impression may people get of the village and it needs to be retained. • This may also be a suitable site for a mix of housing, but especially an area where the remaining numbers of social houses required for the village could be built • Provision must be put in place to ensure that this site does not become the gateway for site 1025 to be developed
567	Land East of Rectory Road	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Conservation of soil and mineral resources – Site is currently used for farm land • Flooding – Parts of the site are at risk from SWF • Enhancement of biodiversity and geodiversity – Trees and hedges located at this site may be of biodiversity value • As with site 563, this may be a site suitable for a small development of houses, which must include a number of affordable units for social housing.

761	Land to the west of Duck Corner	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Conservation of soil and mineral resources – Site in agricultural use • Flooding – Parts of the site are at risk from SWF • Building on this plot would not only greatly effect one of the two magnificent hedges as you enter the village but it would change the character of the village and would open up the field behind it to further development
917	Cliff Cottage, Fox Hill and Highfield, Fox Hill	<ul style="list-style-type: none"> • Enhancement of biodiversity and geodiversity – This site is located close to known habitats of protected species • Areas of historic and archaeological importance – The site is located close to a Grade II Listed Building and development on this site may impact on this buildings setting • Much of this site is already built on and the map is very out of date.
939	Orchard Cottage, Stebbings Lane	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Enhancement of biodiversity and geodiversity – This site is located close to known habitats of protected species • Highways – The site is accessible via a single track which may not be suitable to accommodate development • Very poor highways access • Access to this site could only be via Stebbings Lane which at this point is no more than a single lane track, often used by pedestrians and quite unsuited to additional traffic • Close to a private nature reserve
1025	Land north of Stebbings Lane	<ul style="list-style-type: none"> • This site is outside the Physical Limits Boundary for Hollesley • Quality of where people live and work – Site is flat and contains some elements of biodiversity. The site may be useful as an area of open space. • Flooding – Parts of the site are at risk from SWF • Enhancement of biodiversity and geodiversity – This site provides known habitats for protected species including the Field Woundwort • Highways - The site is not easily accessible. The lack of access via road or path means that the promotion of sustainable transport methods may be difficult • Currently agricultural land and access would be virtually impossible as there is presently a thin footpath/track leading along its length. • The environmental effect on nearby houses would be huge • This is a farming community and the thought of building 146 houses on to such a valuable and productive piece of farm land is deeply unethical and completely out of scale • This site is adjacent to woodland which is the habitat for varied wildlife. Access to this site would require development of the track skirting the village recreation ground and village hall and meeting Woodbridge Road at a point where is limited

1026

Land north of Bushy Lane

- This site is outside the Physical Limits Boundary for Hollesley
- Flooding – the site sits partially within FL 2
- Areas of historic and archaeological importance – There is a potential for some archaeological finds
- Highways – This site is accessible via a narrow road and has no footpath access
- Outside the Physical Limits Boundary and has already had development on over a third of the land
- Bushy Lane often suffers from SWF
- This is prime agricultural land and should remain as such
- Bushy lane cannot accommodate an increase in traffic volumes, being a single track lane
- Due to the topography of this meadow any dwellings built (even if they are Bungalows) on the southern side of this meadow would tower over the existing neighbouring dwellings, and would be seen for miles thereby blighting the complete area
- Any development on the northern side of this meadow would have an impact on the water course as the water table level at this side of the meadow is only approximately 1 metre below the surface
- Any development on this site would also destroy the now rare skylarks nesting site, these now endangered birds have been seen nesting and rearing there young here on this meadow over the last few years

Possible other sites for development

We would like to suggest that the following site could potentially be considered for development, given the correct type of housing was built:

Location	Possible number of houses	Notes
Oak Hill Officers Club	4 to 6 as a small close and in keeping with the current houses in the area	This land is presently owned by the Ministry of Justice.

Conclusions

In conclusion, Hollesley Parish Council and Hollesley residents are not opposed to a controlled amount of suitable and sustainable housing development in the village. We are currently investigating various projects to take back control of the destiny of the village (such as the Community Land Trust and Neighbourhood Plan projects) and would look to work very closely with organisations such as the Alde and Ore Estuary Partnership, the Bawdsey Coastal Partnership and Suffolk Coastal District Council with reference to any Enabling Development proposals.

In addition we have identified why we feel Hollesley, and potentially the entire Wilford Peninsula is not suitable for mass development but is perhaps more suited to smaller growth to meet local needs.

Finally, we would like to thank you for the opportunity to take part in this consultation and for the assistance your staff have offered us throughout the process.

Yours sincerely,

J Hallett

Mrs Judi Hallett

Clerk to Hollesley Parish Council

CC. County Councillor Andrew Reid,
District Councillor Christine Block