

Landscape Proof of Evidence

Of

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**Land at Humber Doucy Lane,
Ipswich, Suffolk**

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On behalf of:

Hopkins Homes/Barratt David Wilson

Report No: CSA/6675/08

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1.0 QUALIFICATIONS, EXPERIENCE AND INVOLVEMENT WITH THE APPLICATION

- 1.1 I am Clive Self and I am a Chartered Landscape Architect and an Urban Designer. I hold a Diploma in Landscape Architecture and a Master's Degree in Urban Design. I have over 30 years' experience in landscape and townscape design and assessment.
- 1.2 I am a Director of CSA Environmental, a multi-disciplinary environmental planning practice which I established in 1999. The practice acts for the public and private sector and has an in-house team of urban designers, ecologists, heritage consultants and landscape architects. We operate throughout the UK.
- 1.3 I was also one of the original authors of the Fields in Trust Six Acre Standard, which sets the standards for the provision of play spaces and recreational playing fields in new developments. I was formally recognised for the contribution I made to those standards, which have been adopted by the majority of Local Authorities in England, including East Suffolk Council.
- 1.4 Prior to forming CSA Environmental I was responsible for landscape architecture and masterplanning at PRC Fewster Architects and before that I was employed in a similar role at Sargent and Potiriadis Architects. I have worked throughout the UK, Middle East and the United States on a broad range of landscape projects, townscape appraisals and environmental planning work.
- 1.5 CSA Environmental is currently involved in projects that range from the masterplanning of new garden villages to redevelopment of inner city brownfield sites. We work throughout the UK, in both the rural and urban environment and act for both the public and private sector.
- 1.6 I have given landscape and urban design advice on numerous schemes. I have also given landscape and urban design evidence at Local Plan/LDF Inquiries, Section 77 and 78 Inquiries, and CPO Inquiries.
- 1.7 The evidence that I have prepared and provide for this appeal is true and has been prepared and is given in accordance with the guidance of my professional institute (Landscape Institute) and I confirm that the opinions expressed are my true and professional opinions.

CSA Environmental's involvement with the Planning Application

- 1.8 CSA Environmental have been involved in the planning application from the outset and have provided both landscape and ecological advice. My colleague, Dr Aidan Marsh, has prepared a separate proof of evidence which deals with the ecological aspects of the reasons for refusal. My evidence

addresses the landscape aspects of the reasons for refusal and has been prepared in collaboration with Greg Collins of CSA Environmental who oversaw the preparation of the Illustrative Landscape Strategy.

- 1.9 I was not personally involved in the design or landscape assessment of the planning application. My colleagues at CSA that undertook that work have extensive experience of the design and delivery of landscape schemes throughout the country. They have similarly designed and delivered play areas and SuDS features etc. Our landscape team worked with CSA's ecologists to create a green infrastructure network that would provide benefits for wildlife and people alike.
- 1.10 In preparing this evidence, I have also liaised with my colleagues to get an insight into how the scheme evolved through dialogue with the local authorities.

2.0 BACKGROUND AND METHODOLOGY

Background

- 2.1 This appeal is in respect of a Hybrid Planning Application which comprises a full planning application for the means of vehicle, cycle and pedestrian access to and from the Site and an outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works.
- 2.2 The Appeal Site lies on the northeastern edge of Ipswich and extends to 31.52 hectares. It falls within the administrative areas of Ipswich Borough Council and East Suffolk Council, with the greater part of the Appeal Site within Ipswich Borough.
- 2.3 The Appeal Site forms the greater part of an allocation for approximately 600 dwellings. The Ipswich Core Strategy and Policies Development Plan of 23 March 2022 allocates the part of the Appeal Site that falls within its Borough for 449 dwellings (Policy ISPA4.1). The East Suffolk Coastal Local Plan allocates the balance of the Appeal Site for 150 dwellings (Policy SCLP 12.24). The allocation also includes a number of other uses, as set out above.
- 2.4 Policy SCLP 12.24 of the Suffolk Coastal Local Plan states that the development will come forward as part of a masterplanned approach which also covers the land that falls within Ipswich Borough. The criteria of Policy SCL 12.24 that are most relevant to this evidence are:
- a) Delivery of a high quality design incorporating a mix of housing types, including affordable housing on-site;*
 - d) Contribution to the creation of a 'green trail' around Ipswich and provision of on-site open space;*
 - f) Provision of a soft edge to the urban area through the provision of significant landscaping; and*
 - j) Design, layout and landscaping of the development should be carefully designed to preserve the setting of the nearby listed buildings.*
- 2.5 Policy ISPA4.1 of the Ipswich Core Strategy similarly acknowledges that 'development will be planned and comprehensively delivered through master

planning of the site, including the allocation of land in East Suffolk, to be undertaken jointly with East Suffolk Council and the landowner'. The criteria of Policy ISPA4.1 are similar to those in the Suffolk Coastal Local Plan, with those most relevant to my evidence set out below.

a) Delivery of a high-quality design in compliance with Policy DM12, including at least 30% affordable housing (unless viability assessment shows otherwise) in accordance with Policies CS8 and CS12. The mix and tenure types of housing will be determined through the master planning process;

b) Development must respect the maintenance of separation between Ipswich and surrounding settlements which is important to the character of the area. This should be achieved by the effective use of green infrastructure to create a transition between the new development/Ipswich urban edge and the more rural landscape character of East Suffolk;

c) The settings of the grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced as part of any future development of the site. Development must also have regard to its impact on the significance of non-designated heritage assets identified in the Heritage Impact Assessment (HIA) (September 2020). An archaeological assessment is also required. Any future planning applications will require an HIA demonstrating how the effects on heritage assets are taken into account and mitigated;

e) Rows of trees covered by Tree Preservation Orders (TPOs) along the boundary with Westerfield House should be preserved unless there are overriding reasons for their removal;

f) Current infrastructure requirements are as follows (subject to any additional infrastructure that may be identified as part of the planning application process):

(ii) Replacement sports facilities if required to comply with policy DM5, other open space in compliance with the Council's Open Space Standards set out in Appendix 3 of the Core Strategy DPD and links to the Ipswich 'green trail' walking and cycling route around the edge of Ipswich;

(iv) Landscaping and development proposals must take account of the Ipswich Wildlife Audit (2019) recommendations for the site, contribute positively to the enhancement of strategic green infrastructure both on and off the site in its vicinity as appropriate, include a 10% biodiversity net gain, and provide a soft edge to the urban area where it meets the countryside;

2.6 The Appellant's Statement of Case explains that separate planning applications were made to the two authorities and that there was extensive

pre application engagement with both planning authorities. Where relevant to this evidence, I shall refer to the comments made on the landscape aspects of the proposed development at the pre-app stage and the subsequent changes that were made to respond to the relevant Officer's comments.

- 2.7 An Illustrative Landscape Strategy (CD L3) was also submitted with the application to show the intended approach to the landscaping of the Appeal Site. It also identified the potential locations for the plays areas, intended recreational routes and indicative planting species. As landscape is a reserved matter, plans such as these are produced to suggest the landscape structure of the development and to enable a dialogue to take place with the relevant planning authority on the approach to the landscaping of the site in question. They are not definitive.
- 2.8 Both applications were refused by IBC and ESC on the 4th June 2024, the day on which their 13 week statutory application period ended.
- 2.9 As the planning SoC states, the reasons for refusal are similar for both applications. For consistency, I have followed the same approach as that set-out in the Appellant's SoC and referred to the RfR set out in the IBC decision notice.

Councils' Joint Statement of Case

- 2.10 The Councils' Joint Statement of Case was originally issued on the 11th November 2024 and subsequently updated on the 10th December 2024. A number of landscape related issues, such as the landscape and visual impact of the proposed main access into the Site from Humber Doucy Lane, are no longer being pursued in their updated SOC.
- 2.11 As I had already addressed those matters in my draft evidence, I have left my original findings, in respect of those topics, in this proof of evidence for completeness.
- 2.12 The reason for refusal in IBC's decision notice that are most relevant to my evidence are:

Reason 3: Humber Doucy Lane

- 2.13 The third reason for refusal is primarily concerned with highways matters but it does also highlight the loss of hedgerow and impact on the character of the lane. The first part of the reason for refusal states:

'The largest development parcel is accessed via a signalised junction onto Humber Doucy Lane opposite Inverness Road. The proposed junction will involve the removal of hedgerow and road widening as well as traffic lights. There are deficiencies identified within the Transport Assessment and further

information required in order to ascertain the acceptability of the junction design and demonstrate its acceptability.

Notwithstanding this there is a fundamental concern with the principal of the junction in this location. Humber Doucy Lane is particularly sensitive in its character and this particular location on Humber Doucy Lane is opposite existing single storey properties and heading west towards less built development and more rural edge to this part of the road. The signalised junction is considered to have an urbanising effect on this part of the road which has not been adequately justified nor impacts fully identified within the relevant assessment information. The potential visual impact of the junction and impact on the amenity of existing residents in this location is not considered to have been adequately justified or outweighed by the documents submitted in support of the application.

Further east along Humber Doucy Lane there is more built development visually present as the houses rise to two-storey and the character of the road begins to feel more urban....'

- 2.14 The Updated Joint Statement of Case by IBC and ESC did however withdraw the allegation that the proposed junction would have an adverse effect on the character and appearance of Humber Doucy Lane.

Reason 4. Landscape and Heritage Impact

The proposed development of the site will bring development into a previously undeveloped site and expand the urban edge of Ipswich into the rural landscape of East Suffolk. A suitable transition space is therefore required between the new development and wider countryside along the northern edge of the application site.

The proposals do include an area of open space along the north-eastern boundary to act as a transition space between the proposed built development and wider Countryside. The transition space is however considered to be too narrow in some areas. The transition space has also been designed to accommodate a number of different uses which will in turn generate a level of activity that will undermine its effectiveness as a space that successively enables a transition from the urban edge of the develop [sic] to a quieter, less intense countryside character.

The quality and design of the transition space is also important to help protect the heritage assets along the northern boundary and more space and planting within this buffer is considered necessary to achieve this.

The design and quantity of space proposed along the north-eastern edge of the development is considered insufficient in creating the necessary transition

space and separation between the new development and countryside beyond. It also fails to provide the mitigation required to protect the identified heritage assets which are to the north of the application site. The proposals are therefore considered to be contrary to the NPPF (paragraphs 135 and 139) and Local Plan policies IPSA4, DM12 and DM13.'

- 2.15 In respect of the impact of the Appeal Scheme on the heritage assets to the north of the Appeal Site, my evidence describes the manner in which the Illustrative Masterplan and accompanying Illustrative Landscape Strategy has been designed to respect these assets. The anticipated impact on the setting of these heritage assets is addressed in the evidence of Mr Kennington.

Reason 12. Open Space and Green Infrastructure

'The quantum and quality of the open space proposed and identified within the Green & Blue Infrastructure Plan fails to meet the relevant policy requirements. The quantity of particular open space typologies is below the required amount identified within the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017) and therefore contrary to Policy DM6 of Local Plan. The location and distribution of certain open spaces is also considered unacceptable in terms of recreational space and childrens spaces being limited to linear routes and transitional spaces at the periphery of the development. More generous spaces should be integrated within the residential parcels of the development. To protect the sensitive character of Humber Doucy Lane a larger set back of the development from Humber Doucy Lane should be shown.

The proposed Green & Blue Infrastructure Plan fails to demonstrate that a suitable range of open spaces will be provided and fails to demonstrate that the spaces which are proposed will be well overlooked, meaningful, useable and suitably distributed throughout the site, contrary to the NPPF (paragraphs 102, 135 and 139), Local Plan Policy DM6 and the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017).'

GLVIA Methodology

- 2.16 The Landscape and Visual Impact Assessment ('LVIA') that accompanied the application (CD L4) was prepared in February 2024 with the Site visit undertaken in September 2023 when the vegetation was in leaf. The LVIA was prepared in accordance with the guidance set out in the third edition of the Landscape Institute's Guidance for Landscape and Visual Effects (GLVIA). The LVIA draws the distinction between landscape effects (i.e. effects on the character or quality of the landscape irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people's views of the landscape from public vantage points, including public rights of

way and other areas with public access, as well as effects from residential properties).

- 2.17 I did not personally prepare the LVIA that was submitted with the planning application, but I have visited the Appeal Site and surrounding area on a number of occasions, during both summer and winter months, and I am in agreement with the findings contained within it.

3.0 SITE DESCRIPTION, CONTEXT AND VISIBILITY

- 3.1 In the following section, I only provide a brief description of the Appeal Site and surrounding area as a detailed assessment is contained in the submitted LVIA (CD L4). A summary of the anticipated landscape and visual effects is also contained in the tables in **Appendix I** of the LVIA.
- 3.2 The LVIA provides a summary of the main national and local landscape policies and other relevant government guidance. As we have a specific landscape reason for refusal and the LPA's SoC, I only refer to the relevant policies cited in the LPA's reasons for refusal rather than replicate the information set out in the LVIA.

Context

- 3.3 The Appeal Site lies on the northeastern edge of Ipswich and comprises three irregular-shaped land parcels. For ease of reference these fields are identified as Parcels A, B and C on the Aerial Photograph in **Appendix B** of the LVIA.

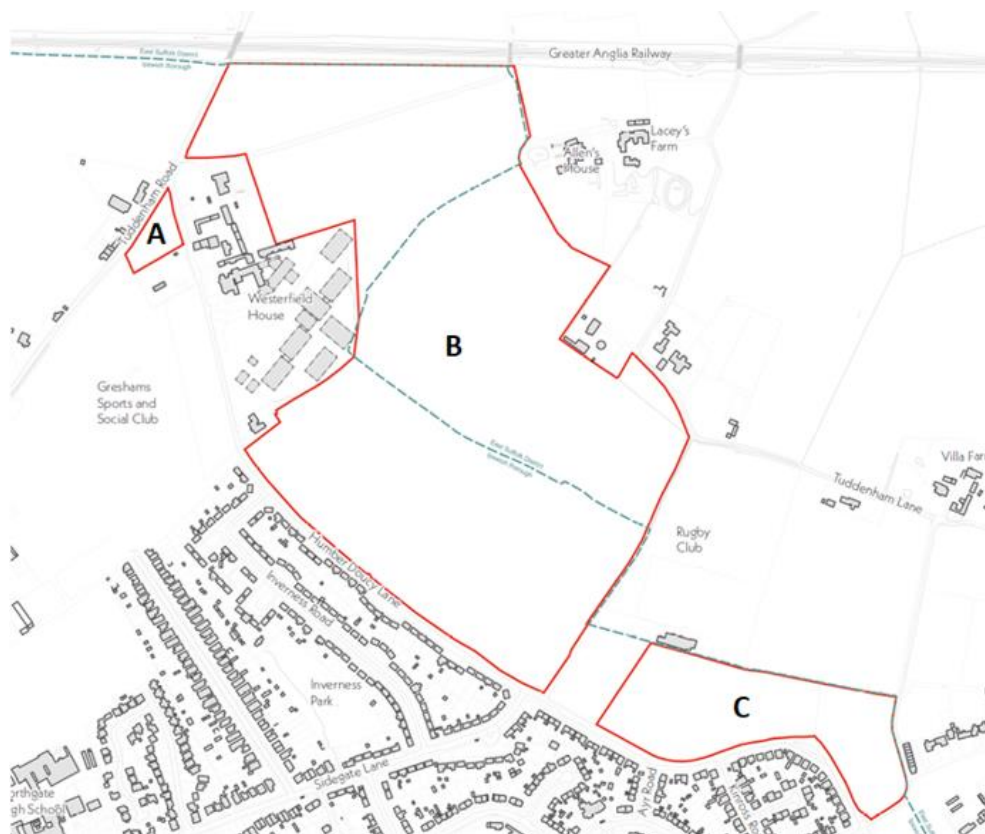


Figure 1 Land Parcels

- 3.4 The southwestern boundary of the Appeal Site borders Humber Doucy Lane. On the opposite side of the lane are a series of detached, semi-detached, and

terraced properties which front onto the lane. Development then extends in depth into the urban area of Ipswich.

- 3.5 Properties within the neighbouring urban area are typically medium density and for the most part comprise a mix of bungalows and two storey houses which date from the post-war era. Within this area there are also a range of community facilities such as Rushmere Hall Primary School; Northgate High School; and the Gretna Garden allotments.
- 3.6 The northwestern corner of the Appeal Site borders Tuddenham Road which leads southwards into the centre of Ipswich, and in a northerly direction, to the village of Tuddenham, which is approximately 1.5 kilometres away.
- 3.7 The Greater Anglia Railway occupies a cutting on the northern edge of the Appeal Site. To the north of the railway are a series of irregular shaped arable fields that have intermittent tree and hedgerow cover on their boundaries. There is also the occasional farm building.
- 3.8 The proposed Ipswich Garden Suburb lies approximately ½ kilometre to the west of the Appeal Site. That site is allocated for residential development of approximately 3,500 dwellings and supporting infrastructure (Policy CS10: Ipswich Garden Suburb in the adopted Ipswich Borough Local Plan).
- 3.9 To the immediate northeast and east of the Appeal Site, are a number of buildings including the Grade II Listed Allens House and Lacey's Farmhouse which are set within heavily vegetated grounds (see Figure 2). There is also Allens Farm and the Old Water Tower which is a prominent feature in the local landscape.



Figure 2 Aerial bird's eye view of Lacey's Farmhouse, courtesy of Google Earth

- 3.10 Tuddenham Lane runs alongside the northeastern boundary of the Appeal Site and continues eastwards to the junction with Lamberts Lane and Seven Cottages Lane. Tuddenham Lane is a single track Quiet Lane and is heavily vegetated with a mix of broadleaf trees with intermittent hedgerow cover alongside it.
- 3.11 Ipswich Rugby Club lies to the southeast of Parcel B and to the northwest of Parcel C. The associated parking area and clubhouse have vehicular access from Humber Doucy Lane. There are three pitches within the grounds, all of which have relatively tall floodlights alongside them.
- 3.12 Seven Cottages Lane borders the eastern boundary of the Appeal Site and serves a terrace of eight two storey houses which front onto the Appeal Site and have parking to the rear. There are also a series of single storey dwellings to the east of these properties. Further east are several irregular shaped fields which extend up to the village of Rushmere St Andrew.

Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich

- 3.13 The Settlement Sensitivity Assessment of Ipswich (CD L1) formed part of the evidence base for the Ipswich Local Plan Review 2018-2036. The Executive Summary section of the document describes its role in the emerging Local Plan. It states that the purpose of the assessment was to provide a robust analysis of the sensitivity of settlement fringes to development and change in order to inform Local Plan policies and land use allocation. It also said that it would similarly inform the submission and determination of planning applications.
- 3.14 The assessment sub divides the fringe of Ipswich into a series of sectors with the Appeal Site falling within IP2 Land Northeast of Ipswich.
- 3.15 Area IP2 extends from Woodbridge Road to the south to the fields to the east of Henley Road. In describing land within the Appeal Site or close to it, the assessment states that:

'land between Tuddenham Road and Villa Farm, although elevated, is relatively flat and enclosed by mature hedgerows. It is not widely visible from the surrounding landscape and lies close to the existing urban edge. This area is less sensitive to residential and commercial development where it is associated with new woodland planting. Care will be needed to ensure rural countryside beyond the Ipswich administrative area continues to function as a 'green rim' to the town.'

- 3.16 The section which describes the 'Existing Settlement Edge' states:

'In a number of places the pattern of development ends abruptly along historic roads e.g. Humber Doucy Lane.....'

- 3.17 The section that deals with 'Perceptual Qualities' also addresses the relationship to Humber Doucy Lane. It states:

'Rural qualities and abrupt contrast to urban edges along Humber Doucy Lane...'

- 3.18 From my observations on Site, I consider that is a fair description of Humber Doucy Lane as it does not have a sensitive interface with the neighbouring countryside and playing fields.

- 3.19 The 'Opportunities' section of the assessment states the following:

'Historic Lanes provide opportunities for green links between the existing urban area and wider countryside – providing quick access to natural and semi-natural green space. Opportunities to soften and integrate the existing urban edge and wider landscape through select urban development in association with the creation of green corridors penetrating the urban fabric of Ipswich. There is scope for the creation of new woodland to form skyline features.'

Landscape Character

- 3.20 The national and regional landscape character context is set out in the LVIA and as such it is not repeated here.

- 3.21 The local landscape character assessment, that covers the northeastern part of the Appeal Site, and the neighbouring area, is the Suffolk Coastal Landscape Character Assessment of July 2018. That assessment subdivides the Landscape Character Types, that have been identified at a county level, into smaller Landscape Character Areas ('LCA').

- 3.22 The northeastern part of the Appeal Site is identified as lying in LCA N2, the Culpho and Westerfield Rolling Farmland Landscape Character Area. The LCA extends from the north eastern edge of Ipswich towards the southern edge of Otley and eastwards towards Grundisburgh.

- 3.23 The report describes the Culpho and Westerfield Rolling Farmland LCA as a flat and gently rolling, fairly unified countryside, of farmlands with oak trees and lined with ancient hedges. Tranquillity is said to be compromised by the busy roads. It acknowledges that the area is likely to see much change in coming years from the planned northern expansion of Ipswich.

- 3.24 The assessment identifies several special landscape qualities/features, which are consider most sensitive to change. Those most relevant to the Appeal Site are:

- *'This area is important as the rural setting to the northern edge of Ipswich and as setting to a number of villages. The visual experience varies from*

longer views over open arable land with lightly wooded feel, to contained views where hedge roads and lanes offer intimacy.

- *Oak trees at intervals along lanes and field boundaries are very distinctive.'*

3.25 The assessment identifies the landscape condition of the field boundary hedgerows as being in moderate condition, which is consistent with my observations of the area.

3.26 The Appeal Site displays some characteristics of the wider rural landscape in that part of it comprises a medium to large scale, relatively flat, arable field with hedgerows and occasional oak trees along its boundaries. It also contains a playing field in the southern part of the Appeal Site.

Appeal Site Description

3.27 The Appeal Site comprises three irregular-shaped land parcels, which are currently actively farmed, part of a playing field, and a small area of plantation woodland. There are no built structures within the Appeal Site. Structural vegetation is largely confined to field boundaries.

Parcel A

3.28 Parcel A occupies a small parcel of untended land and includes a mature oak tree. This parcel lies immediately to the south of the junction of Tuddenham Road and Humber Doucy Lane and is to remain undeveloped.

Parcel B

3.29 Parcel B comprises two arable fields, which are separated by a public footpath which follows the track which leads to Lacey's Farm. The footpath has trees and scrub vegetation alongside it. The northern boundary of Parcel B borders the railway cutting and similarly has intermittent vegetation alongside it.

3.30 The northeastern boundary of Parcel B comprises a series of broadleaf trees and an established hedgerow which separates the Appeal Site from the grounds of the listed properties of Lacey's Farm and Allens House. There is also an area of plantation woodland at the northeast corner of the parcel.

3.31 The eastern boundary of Parcel B follows the access road which serves the rugby pitches. This boundary is bordered by an outgrown mixed-species hedgerow with intermittent tree cover.

3.32 Westerfield Residential Care Home is indented into the southwestern boundary of Parcel B and has intermittent vegetation along its boundaries. That site is currently undergoing significant change as an additional 147 assisted living homes, which are up to 3 storeys high, are being constructed on the site.

- 3.33 The southern boundary of Parcel B follows Humber Doucy Lane and is defined by an established native hedgerow which has limited tree cover.
- 3.34 There are a series of bungalows on the section of Humber Doucy Lane that lies between Sidegate Lane and Inverness Road. These properties are set back behind a wide grass verge, which accommodates a number of broadleaved trees. A footway runs alongside the grass verge and borders the front gardens of the bungalows.

Parcel C

- 3.35 The western part of Parcel C occupies part of an existing playing field with the eastern part comprising an irregular shaped arable field. The land is relatively flat.
- 3.36 The southern boundary of Parcel C borders Humber Doucy Lane and consists of a largely treeless outgrown hedgerow which has the occasional break in it.
- 3.37 On the southern side of Humber Doucy Lane there are bungalows which mainly have hard standing in their front gardens. There is no grass verge separating the gardens from the footway which borders the road, other than a small area where the road curves. There is also street lighting alongside the road.
- 3.38 The southeastern boundary follows Seven Cottages Lane and has intermittent tree and hedgerow cover. The northern boundary of the parcel in part borders a neighbouring field and in part borders the rugby ground. This boundary is typically heavily vegetated.

Statutory and Non Statutory Designations

- 3.39 The Appeal Site is not covered by any statutory or non-statutory designations for landscape character or quality.

The Conservation Area and Listed Buildings

- 3.40 There are no designated heritage assets within the Appeal Site. The Grade II Listed Allens House and Laceys Farmhouse border the northeastern boundary of the Appeal Site. The Grade II Listed Westerfield House also borders the western boundary of Parcel B.

Public Rights of Way

- 3.41 The Appeal Site is crossed by two public footpaths with a third footpath running alongside the eastern boundary of Parcel B. Footpath Rushmere 17 follows the track leading to Lacey's Farm which borders the northwestern part of the Appeal Site. Public footpath Rushmere 5 runs from Humber Doucy Lane through the centre of Parcel C and then continues northwards along the eastern edge

of the rugby pitches. Footpath Rushmere 6 runs alongside the eastern boundary of Parcel B and provides a link between Humber Doucy Lane and Tuddenham Lane. All of the footpaths then continue northwards into the wider rural footpath network.

Tree Preservation Orders

- 3.42 A number of trees on the western boundary of Parcel B are covered by Tree Preservation Orders. There are no other trees within the Appeal Site covered by TPOs.

Topography

- 3.43 Parcel B gently slopes to the north and south with a highpoint of approximately 50m Above Ordnance Datum ('AOD') at roughly the midpoint of the parcel. Parcel C is relatively flat.
- 3.44 In the wider landscape, the topography is generally undulating and slopes down to the River Orwell and the River Fynn valley.

Landscape Quality and Sensitivity

Quality

- 3.45 The Appeal Site comprises several arable fields, a rugby playing field and a small parcel of plantation woodland. A tree survey has been carried out by Hayden's Arboricultural Consultants which grades the boundary trees and hedgerows as predominantly Category B and of medium landscape quality. There are several Category A trees alongside the footpath in the northern part of Parcel B as well as on the northern boundary adjacent to the railway. There is also a single oak on the northern edge of Parcel C and within Parcel A, and all of these trees are assessed as Category A.
- 3.46 The character of the Appeal Site exhibits some characteristics of the LCA within which it lies, in that it contains arable farmland. However, the Appeal Site's character is also influenced by the settlement edge of Ipswich, the neighbouring roads and Ipswich Rugby Club which includes a clubhouse, parking and three floodlit rugby pitches. Parcel C is of less typical of the wider rural landscape character, given that part of it is currently a rugby playing field. Overall, the Appeal Site is assessed as being of medium landscape quality.

Sensitivity

- 3.47 The Appeal Site is assessed as being of medium landscape sensitivity to the Appeal Scheme. Development within the southern part of the Appeal Site will be well related to the existing built up area and will be viewed as a natural extension to the northeastern part of Ipswich. The northern part of the

development will be well contained by new structural planting. The Appeal Site is therefore considered to be medium landscape sensitivity to residential development proposed.

- 3.48 The adjoining residential area to the south of the Appeal Site predominately comprises detached bungalows and semi-detached mid-20th century housing. It is considered to have a medium townscape quality and value, and medium to low sensitivity to new housing development in the immediate vicinity.
- 3.49 The wider landscape surrounding the Appeal Site to the west, north and east is considered to be of medium-high landscape quality, sensitivity and value. The Suffolk Coastal landscape assessment places value on the varied mixture of mature native trees and hedgerows; ancient woodland; river valleys; and gently rolling arable countryside with scattered farms and villages.

Landscape Value

- 3.50 The reasons for refusal and the Council's Statement of Case do not say that the Appeal Site is a Valued Landscape in respect of para 187a. Nevertheless, for completeness, I have assessed the Appeal Site against the criteria for landscape value set out in the Guidelines for Landscape and Visual Impact Assessment 3rd edition ('GLVIA') and the supplementary advice issued by the Landscape Institute in 2021 ('TGN 02/21'). The supplementary advice is not intended to provide an exhaustive list and identifies matters that could be considered.
- 3.51 Box 5.1 of the 3rd edition of GLVIA sets out seven factors that can help in the identification of Valued Landscapes. I have set these out below with my observations beneath. Where appropriate, I have added, in italics, the definitions contained in the additional guidance in TGN 02/21.

Landscape quality (condition) *Landscape condition*

- 3.52 The Appeal Site comprises several arable fields and part of a playing field together with boundary planting and a small area of plantation woodland. The arable fields are actively farmed and the playing fields are in use and well managed.
- 3.53 TGN 02/21 states that examples of indicators of landscape value include the 'absence of detracting/incongruous features (or features are present but have little influence)'. In the case of the Appeal Site, there are some opportunities for views of the housing which lies immediately to the south of the Site together with the emerging development at Westerfield Care Home. The playing fields, floodlighting, and associated parking at the rugby club also have an influence on the area.

Scenic quality

- 3.54 The Appeal Site does not carry any statutory or non-statutory designations for its intrinsic landscape quality. There are opportunities for some open views across the Appeal Site from both public and private viewpoints and these will have some local value.

Rarity (Distinctiveness)

- 3.55 The Appeal Site does not contain any rare elements.

Conservation Interest (Natural heritage and cultural heritage)

- 3.56 The Appeal Site is not covered by any ecological designations nor is it covered by any heritage designations. There are several listed buildings within the vicinity of the Appeal Site but it is agreed in the SoCG that the level of harm that would arise to the setting of these buildings is at the lower end of less than substantial.

Recreation value

- 3.57 There are several public rights of way crossing the Appeal Site and the playing fields are actively used.

Perceptual aspects

- 3.58 GLVIA refers to perceptual aspects as a landscape which is valued for notable qualities of wildness and/or tranquillity. The Site cannot be described as wild as it is actively managed farmland.
- 3.59 As far as I'm aware, in landscape terms, there is no formal definition of tranquillity but the two most common factors are land that is free from, or influenced by, noise and visual intrusion of urban features. As I have already noted, the houses which face onto the southern part of the Appeal Site do not fall within a Conservation Area nor are any of them listed. The rugby pitches are also floodlit. Given these factors, the Appeal Site cannot, on any reasonable basis, be described as tranquil.

Association

- 3.60 As far as I am aware the Appeal Site does not have any associations with notable historic figures or historic events.

Function *(This is a new factor identified in TGN 02/21)*

- 3.61 In the TGN 02/21 guidance, the term 'function' covers a range of qualities with the emphasis on 'healthy functioning landscapes'. Examples include hydrological systems, peat bogs, woodlands, oceans and wildflower meadows, amongst other things. It also states that it includes 'landscapes and

landscape elements that have strong physical or functional links with an adjacent national landscape designation.'

- 3.62 Like all sites, the Appeal Site performs some function e.g. carbon absorption, absorption of rainwater etc. and is largely actively farmed. But there is nothing that would elevate its status above that of a typical greenfield site. Equally It does not have any direct or indirect links with a nationally designated landscape.
- 3.63 Given the above factors, I consider the Site to be of medium landscape value and I do not consider it to be a Valued Landscape for the purpose of para 187a of the NPPF.

| Table 1 Summary of Existing Landscape Quality | |
|-----------------------------------------------------------------------------------------------------------|----------------|
| Landscape Features | Quality |
| Trees | Medium - High |
| Hedgerows | Medium |
| Public Rights of Way | High |
| Land Use | Medium |
| Landscape / townscape character | Quality |
| Landscape character the Site | Medium |
| Landscape character of immediate surroundings | Medium |
| Townscape character of neighbouring area | Medium |
| Wider Landscape Character | Medium - High |
| <i>Culpho and Westerfield Rolling Farmland LCA: Suffolk Coastal Landscape Character Assessment (2018)</i> | |

Visibility

- 3.64 The LVIA provides a comprehensive assessment of the main views of the Appeal Site with the tables in **Appendix I** of the LVIA (CD L4) summarising the baseline conditions and the anticipated effects. The following section is therefore only a brief summary of the main viewpoints with the sensitivity of the receptors summarised in Table 2.
- 3.65 The nature and extent of the boundary vegetation is such that the Appeal Site is generally well contained from the wider countryside with views largely

confined to the neighbouring roads/lanes, public footpaths and properties which border the Appeal Site.

Near distance views

- 3.66 Views from public footpath Rushmere 17 which crosses the northern part of Parcel B are largely prevented by the hedgerows and trees which border the footpath. Views of the northernmost part of Parcel B are available from the section of Tuddenham Road which runs alongside it, where breaks in the boundary vegetation occur. As one progresses northwards on Tuddenham Road the Appeal Site is screened by the roadside vegetation and that on the railway embankment.
- 3.67 There are open views across Parcel C from public footpath Rushmere 5 which crosses it. As the public footpath continues northwards and runs alongside the edge of the rugby pitches, views of Parcels B and C are largely screened by the field boundary vegetation and the rugby clubhouse. There are also some opportunities to see the properties on Humber Doucy Lane. Similar views are available from public footpath Rushmere 6 which runs alongside the western edge of the pitches. At the southern end of this path there are open views into Parcel C. Elsewhere the hedgerow which borders the western edge of the path screens views of Parcel B.
- 3.68 There are opportunities for open views of Parcel C from the section of Seven Cottages Lane which leads from Humber Doucy Lane to the end of the terraced cottages which face onto the Parcel. As one progresses northwards the dense vegetation which borders both sides of the lane prevents views.
- 3.69 Views of the Site from Humber Doucy Lane are mostly screened by the roadside hedgerow although there are some opportunities for views where breaks in the hedgerow occur. There are similarly some views from the properties on the opposite side of Humber Doucy Lane.
- 3.70 There are some views into Parcel B from Westerfield Residential Care Home and the properties at Tuddenham Road Business Centre.

Middle distance views

- 3.71 Views from public footpath Rushmere 1A to the north of the railway line are generally screened by intervening vegetation although glimpsed views of the higher ground of Parcel B are occasionally possible.
- 3.72 Views from public footpath Rushmere 48 further to the east, looking across the intervening fields towards the Site are screened by field boundary vegetation.

| Table 2 Summary of Visual Sensitivity | |
|--------------------------------------------------------------------------------------------------------------|-------------|
| Visual receptors | Sensitivity |
| View from Humber Doucy Lane (Photographs 14, 15, 16, 17, 21 and 22) | Medium |
| View from Inverness Road, Sidegate Lane, Ayr Road, Kinross Road and Roxburgh Road | Low |
| Views from Public footpath Rushmere 17 (Photograph 8 and 11) | High |
| Views from Public footpath Rushmere 5 (Photograph 2, 1, 30 and 32) | High |
| Views from Public footpath Rushmere 6 (Photograph 18, 19 and 20) | High |
| View from Tuddenham Road (Photograph 12 and 13) | Medium |
| Views from Main Road (Photograph 34) | Medium |
| View from Seven Cottages Lane (Photograph 23 and 24) | Medium/High |
| Views from Tuddenham Lane (Photograph 29) | Medium/High |
| Views from Greater Anglia Railway Line | Low |
| Views from Public footpath Rushmere 1A (Photograph 33) | High |
| Views from residential properties on Humber Doucy Lane (Reciprocal view at photographs 1, 3, 4 and 6) | Medium |
| Views from Grade II Listed Westerfield House (Reciprocal view at photographs 6, 7 and 8) | High |
| Views from residential properties on Inverness Road, Sidegate Lane, Ayr Road, Kinross Road and Roxburgh Road | Medium |
| Views from Grade II Listed Allens House (Reciprocal views at photograph 5) | High |
| Views from Grade II Listed Lacey's Farmhouse | High |
| Views from properties on Tuddenham Road | Medium |
| Views from properties on Seven Cottages Lane (Reciprocal view at photographs 22, 23, 24 and 25) | Medium/High |
| Views from properties on Tuddenham Lane (Reciprocal view at photograph 2) | Medium/High |

4.0 NATURE OF THE APPEAL SCHEME AND ANTICIPATED LANDSCAPE AND VISUAL EFFECTS

Context

- 4.1 Policy ISPA4 of the Ipswich Core Strategy and Policies Development Plan sets out the need for cross boundary working to deliver sites in a coordinated and comprehensive manner. The Appeal Site falls within the allocated site at the Northern End of Humber Doucy Lane (ISPA4.1), the total area of which is identified as 23.28 ha. The policy states that 60% of the site within Ipswich Borough is allocated for housing and 40% is allocated for secondary uses, comprising open space and other green and community infrastructure.
- 4.2 The policy then identifies a series of criteria which development is required to comply with. I have set out below the sections of the criteria that are most relevant to my evidence:

'a} Delivery of a high-quality design in compliance with Policy DM12...'

b) Development must respect the maintenance of separation between Ipswich and surrounding settlements which is important to the character of the area. This should be achieved by the effective use of green infrastructure to create a transition between the new development/Ipswich urban edge and the more rural landscape character of East Suffolk;

c) The settings of the grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced as part of any future development of the site....

e) Rows of trees covered by Tree Preservation Orders (TPOs) along the boundary with Westerfield House should be preserved unless there are overriding reasons for their removal;

f) Current infrastructure requirements are as follows (subject to any additional infrastructure that may be identified as part of the planning application process):

ii. Replacement sports facilities if required to comply with policy DM5, other open space in compliance with the Council's Open Space Standards set out in Appendix 3 of the Core Strategy DPD and links to the Ipswich 'green trail' walking and cycling route around the edge of Ipswich;

iv. Landscaping and development proposals must take account of the Ipswich Wildlife Audit (2019) recommendations for the site, contribute positively to the enhancement of strategic green infrastructure both on and off the site in its vicinity as appropriate, include a 10% biodiversity net gain, and provide a soft edge to the urban area where it meets the countryside'

- 4.3 Policy SCLP12.24: Land at Humber Doucy Lane, of the Suffolk Coastal Local Plan 2020, identifies the part of the Appeal Site that falls within their District as comprising 9.9ha of land to the east of Humber Doucy Lane. The land is identified to come forward for the development of approximately 150 dwellings in conjunction with land identified in the Ipswich Local Plan.
- 4.4 The policy also states that the development will only come forward as part of a masterplanned approach with land in Ipswich Borough. It also sets out a series of criteria that development will be expected to comply with. The criteria mirror those in the Ipswich Core Strategy and Policies Development Plan but do not identify a requirement for the 60% and 40% split between housing and secondary uses.

Nature of the Planning Application

- 4.5 The planning application is in outline form only, save for means for access. A series of parameter plans have been provided together with an Illustrative Landscape Strategy. The parameter plans make it clear that the locations of the play areas are indicative and similarly, that the exact boundaries of the various land-use parcels, will be defined at the reserved matters stage.

Structure of the Appeal Scheme

- 4.6 The landscape factors which informed the Illustrative Masterplan reflect the criteria set out in ISP A4.1, with the DAS and Illustrative Landscape Strategy describing the intended approach to the design and character of the various areas.
- 4.7 The key landscape component of the Appeal Scheme is the provision of a green infrastructure network that provides a clearly defined boundary to the Appeal Scheme and which sub divides the residential development parcels. The green infrastructure will accommodate a variety of opportunities for passive and recreational opportunities for people of all ages. These range from informal green trails, to play areas, to a community orchard, amongst other things. The green infrastructure will also accommodate drainage basins and swales which can be attractive features in the own right as well as providing wildlife benefits.

- 4.8 The character of the various components of the green infrastructure network are shown on the Illustrative Landscape Strategy. I have also summarised the approach to the design of the Appeal Scheme under the following sub headings which reflect the criteria set out under Policy A4.1

Delivery of a high-quality design

- 4.9 The quality of the design is ultimately one for the reserved matters application but the spatial arrangement of the masterplan makes provision for a variety of spaces. Given the scale of the development, I consider that it is desirable to have variety within the development. For example, streets within the development will have a more formal character whereas those on the external boundaries of the Appeal Site will have a more rural character and in places have an understorey of scrub planting. The treatment of the open spaces will similarly vary with the central green being framed by houses and will have a more formal character whereas the green infrastructure on the external boundaries will have an informal character in that it will vary in width, have rustic timber play equipment, informal seating areas and a community orchard, amongst other things.

Green infrastructure to create a transition between the new development/Ipswich urban edge and the more rural landscape character of East Suffolk.

- 4.10 The provision of a soft green edge to the development is one of the key components of the masterplan. It is also relevant to note that the boundary between the Appeal Site and the wider countryside is already clearly defined by established vegetation and that the new planting will reinforce this and be of similar species.

The settings of the Grade II Listed Westerfield House Hotel, Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse must be preserved or enhanced.

- 4.11 This is a matter which is addressed in the Heritage Proof of evidence but a swathe of open space will be provided alongside this boundary and the parties agree that there will be a 'low level' less than substantial harm to the significance of these heritage assets.

Tree Preservation Orders (TPOs) along the boundary with Westerfield House should be preserved.

- 4.12 This is ultimately one for the reserved matters application but there is nevertheless a swathe of open space alongside this boundary and so I do not envisage it being an issue.

Replacement of sports facilities if required

- 4.13 This matter is addressed in the planning proof of evidence and the Open Space Assessment that the appellant submitted with the application. This shows that there is a surplus of playing fields in the local area.

Links to the Ipswich 'green trail' walking and cycling route

- 4.14 The Illustrative Landscape Strategy, and illustrative site sections on the plan, show that there will be a network of formal and informal footpaths within the linear areas of open space and that these will connect to the wider footpath network in both the neighbouring countryside and also that within the urban area of Ipswich.

The 10% biodiversity net gain, and provide a soft edge to the urban area where it meets the countryside'

- 4.15 This matter is addressed in the evidence of Dr Marsh but as I have already noted, CSA's landscape team worked closely with our in house team of ecologists to ensure that the green infrastructure would deliver benefits for wildlife as well as for new and existing residents.
- 4.16 The green infrastructure will also accommodate a number of play areas for children/youths of all ages. These play areas will be within a comfortable walking distance of all the properties within the development and will similarly be accessible to existing residents.

Evolution of the Appeal Scheme

- 4.17 The Appeal Scheme also evolved through dialogue with the local authorities. There was a Green Infrastructure Workshop which one of my colleagues attended, together with Mr Coleman.
- 4.18 The Framework Masterplan that was discussed at that Green Infrastructure Workshop was structured with swathes of open space on the exterior boundaries of the Appeal Site and a green corridor following a northwest to southeast alignment through Parcel B. The green corridor that was proposed within Parcel B followed the alignment of a former field boundary. At that stage there was no central green proposed.
- 4.19 The key issue that arose from the workshop was the suggestion that a central green space was provided, as opposed to linear green corridor. It was suggested that the central green would have a more formal character and that it would also contain a play area. The central green space would fall within the Council's Parks and Gardens typology. The provision of open space in front of Seven Cottages was welcomed.

- 4.20 Following the workshop, the Illustrative Masterplan was reconfigured to include a formal central green space as suggested by the local authorities.

Landscape and Visual Effects

- 4.21 A detailed assessment of the anticipated landscape and visual effects is contained in **Appendix I** of the LVIA (CD L4) and summarised below.
- 4.22 In Tables 1 to 3 of this evidence I have also provided a shortened version of the tables in the LVIA. These identify what I consider to be the key landscape and visual effects to consider at year 15. I have removed the narrative which sits alongside the judgements and the effects at year 1 to condense down the tables. This does not mean that I disagree with the narrative in the tables or the effects at year 1 which are contained in the original LVIA.
- 4.23 Judgements on landscape and visual effects is ultimately subjective and where I have reached a different judgement to that contained in the LVIA I have highlighted it in green.

Landscape Features

- 4.24 The Illustrative Landscape Strategy shows how the Appeal Site can be developed while retaining the majority of existing boundary vegetation. A section of the hedgerows on the southern and western boundaries will require removal to facilitate the access roads into the Appeal Site off Humber Doucy Lane and Tuddenham Road. The footways within the Site will also connect to the neighbouring footways, but the loss of vegetation to enable this to happen is minimal.
- 4.25 The hedgerows which require removal to create the accesses into the Appeal Site from Humber Doucy Lane and Tuddenham Road can either be transplanted to the back edge of the visibility splays or new planting can be provided, as demonstrated on the Illustrative Landscape Strategy. Overall, there will be a significant increase in tree and hedgerow cover within the Appeal Site.

Impact on Public Rights of Way

- 4.26 The Appeal Site is crossed by several public footpaths which link the existing urban area to the wider countryside. These footpaths will be retained on their current alignments and surfaced in an appropriate manner.
- 4.27 Within the development itself, there will also be new pedestrian and cycle links and a Green Trail. These routes will link to both the urban area and the wider countryside.

Landscape Character of the Appeal Site

- 4.28 The character of the Appeal Site will inevitably change from that of arable farmland and playing fields to a medium density residential development that would be set within a green framework.
- 4.29 The Appeal Scheme will also deliver significant landscape and ecological enhancements, with semi natural greenspace proposed along the northeastern boundary, and a central village green at the heart of the development. The proposed play areas and the Green Trail will provide both passive and active recreational opportunities for both new and existing residents alike.
- 4.30 The impact of the Appeal Scheme on the character of the Appeal Site is considered to be substantial/moderate adverse at completion, reducing to moderate adverse at year 15.

Impact on the wider landscape

- 4.31 The Appeal Site boundaries are already clearly defined and separate the Appeal Site from the wider countryside. With additional boundary planting in place these boundaries will be further strengthened and as a result the indirect effects of the development on the wider countryside will be negligible.

Impact on townscape character of the neighbouring area

- 4.32 The existing settlement edge, which overlooks the Appeal Site, is relatively abrupt and it does not fall within a conservation area nor is it of any particular architectural merit. It does nevertheless currently look out over predominantly open land.
- 4.33 The impact in townscape terms is assessed in the LVIA as negligible adverse at year 15 because the open character of eastern side of Humber Doucy Lane will change. This does not mean that development will not be attractive nor of an appropriate scale or density.

| Table 3 Summary of Landscape Effects | | |
|--------------------------------------------------------------------------------------------------------------------------------------------|---------------------|---------------------------------------------|
| Direct effects on landscape features | Magnitude of Change | Effect Year 15 |
| Trees | Slight | Slight beneficial |
| Hedgerows | Slight | Slight beneficial |
| Public Rights of Way | Slight | Slight beneficial |
| Land Use | Substantial | Moderate Adverse |
| Indirect effects on landscape / townscape character | Magnitude of Change | Effect Year 15 |
| Landscape character the Site | Substantial | Moderate Adverse |
| Landscape character of immediate surroundings | Moderate to Slight | Slight Adverse |
| Townscape character of neighbouring area | Slight/Moderate | Slight Adverse (as new landscaping matures) |
| Wider Landscape Character <i>Culpho and Westerfield Rolling Farmland LCA: Suffolk Coastal Landscape Character Assessment (2018)</i> | Negligible | Negligible Adverse |

Visual Effects

- 4.34 The landscape and visual effects table in **Appendix I** of the LVIA identifies the key views of the Appeal Site and describes the existing and content of the view and anticipated effects. As visual impact does not form part of the reason for refusal the following section only provides a summary of the visual effects. A summary of the effects is also contained in Table 4 of this evidence.
- 4.35 The Appeal Site as it currently stands, for the most part, benefits from heavily vegetated boundaries with views generally confined to near distance views.
- 4.36 The main views of the Appeal Scheme will be from the public footpaths which cross the Appeal Site, from the neighbouring rugby pitches, and from the roads and lanes which border the Appeal Site. From the wider countryside to the north there will only be a strictly limited number of opportunities to see development on the Appeal Site and where such views exist they will reduce

overtime as the proposed boundary planting matures. There will also be some opportunities for views from the neighbouring properties.

- 4.37 From public footpath Rushmere 1A, to the north of the railway, there will, in the short term, be some opportunities for glimpsed views of housing in Parcel B. As the proposed boundary planting matures, the views will be screened or filtered.
- 4.38 Once Public Footpath Rushmere 5 crosses Tuddenham Lane development on the Appeal Site will be screened from view by the intervening vegetation. There may be some opportunities for heavily filtered views in the winter but with additional planting in place these views will be screened.
- 4.39 From the south, there will be some opportunities to see the proposed development beyond the existing hedgerow. Additional tree planting will be introduced on this boundary to further soften the view but the intention is not screen the development in its entirety as we want it to read as a natural extension to this part of Ipswich.
- 4.40 Similarly, there will be some opportunities to see housing from the short section of Tuddenham Road that borders the Appeal Site, but once again there will be a hedgerow on the site frontage and additional trees will be introduced.
- 4.41 The eastern part of the Appeal Site will be occupied by a community orchard, play area and SuDS feature. The existing cottages which front onto this part of the Appeal Site will look onto these features, with oblique views of the proposed housing further to the west. Views from further east will typically be screened by intervening vegetation.

| Table 4 Summary of Visual Effects | | |
|-----------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------|
| Visual receptors | Magnitude of Change | Visual Effect Year 15 |
| View from Humber Doucy Lane (Photographs 14, 15, 16, 17, 21 and 22) | Substantial – Moderate (adjacent to the southern Site boundary) Neutral (elsewhere) | Moderate Adverse (adjacent to the southern Site boundary) Neutral (elsewhere) |
| View from Inverness Road, Sidegate Lane, Ayr Road, Kinross Road and Roxburgh Road | Slight | Slight – Negligible Adverse |
| Views from Public footpath Rushmere 17 (Photograph 8 and 11) | Moderate – Substantial | Moderate Adverse |
| Views from Public footpath Rushmere 5 (Photograph 2, 1, 30 and 32) | Substantial (within the Site) Moderate – Slight (alongside the Rugby Club pitches) Neutral | Substantial – Moderate Adverse (within the Site) Slight Adverse (alongside the Rugby Club pitches) Neutral |
| Views from Public footpath Rushmere 6 (Photograph 18, 19 and 20) | Substantial (southern section of footpath) Moderate – Slight (northern section of footpath) | Substantial – Moderate (southern section of footpath) Slight Adverse (northern section of footpath) |
| View from Tuddenham Road (Photograph 12 and 13) | Moderate (adjacent to the western Site boundary) Neutral (elsewhere) | Moderate – Slight Adverse (adjacent to the western Site boundary) Neutral (elsewhere) |
| Views from Main Road (Photograph 34) | Negligible | Negligible Adverse |
| View from Seven Cottages Lane (Photograph 23 and 24) | Moderate – Substantial (adjacent to the eastern Site boundary) Neutral (elsewhere) | Moderate Adverse (adjacent to the eastern Site boundary) Neutral elsewhere) |

5.0 RESPONSE TO LANDSCAPE MATTERS RAISED IN THE REASONS FOR REFUSAL

- 5.1 In the following section I respond to the specific landscape matters identified in the reasons for refusal. I also make reference to the Officer's Delegated Reports for both planning authorities: Ipswich Borough Council's Delegated Report ('IBCDR'), East Suffolk Delegated Report ('ESDR').
- 5.2 There have also been a number of objections to the Appeal Scheme from local residents and other interested parties. As these are quite wide ranging, I have not addressed them specifically in this section as many of the topics have been considered in Section 4 of this evidence, which deals with the anticipated effects of the development.

Reason for Refusal 3

- 5.3 The third reason for refusal is primarily concerned with highways matters but also states that the proposed highway junction opposite Inverness Road is considered to negatively impact on this part of the Humber Doucy Lane.
- 5.4 The Councils' Updated Joint Statement of Case no longer pursues this point but for completeness I have set out below my response to this matter.
- 5.5 Paragraph 7.19 of the Council's Original Statement of Case also addressed the impact of the main vehicular access from Humber Doucy Lane on the character and appearance of the area. It stated:

'Notwithstanding the technical acceptability of the junction design (or otherwise), the scale and position of the junction proposed would have an adverse impact on the character of this part of Humber Doucy Lane, at a point where there is a clear transition from urban to rural.'

- 5.6 I have already described the character of the various parts of the Humber Doucy Lane Site frontage and I do not consider that it has a rural character. The Settlement Sensitivity Assessment of the Landscape Fringes of Ipswich of 2018 (CD L1) stated that: *'In a number of places the pattern of development ends abruptly along historic roads e.g. Humber Doucy Lane. Housing along this lane comprises a mixture of two and single storey houses....'*
- 5.7 In considering the impact of the junction into the Appeal Site and the allegation that it would have an adverse impact on the part of Humber Doucy Lane *'where there is a clear transition from urban to rural'* it is important to look at both the existing position and how things could change in the future.
- 5.8 In regard to the future, the land on the west side of Humber Doucy Lane is currently an undeveloped greenfield site which reads as part of the

countryside. That land is however allocated for residential development under Policy ISPA 4.1. With that development in place, it will be accessed off Humber Doucy Lane and read as part of Ipswich as opposed to the rural landscape.

- 5.9 In terms of the current position, the new junction will be opposite Inverness Road which lies within the settlement boundary. The section of the road that borders the Appeal Site is suburban in character and does not have a loose rural character. As one progresses northwards on Humber Doucy Lane the eastern side of the road currently has a more rural character and is densely vegetated. The eastern section of the road borders the grounds of Westfield Residential Care Home which is currently being developed for a significant number of assisted living/extra care units and associated staff dwellings. The character of that site will inevitably change with the approved development in place.
- 5.10 The junction will be signalised and will require the removal of approximately 124 metres of hedgerow. This hedgerow can either be transplanted or a new hedgerow planted at the back edge of the visibility splay.



*Photograph 1 Location of main vehicular access from Humber Doucy Lane.
Courtesy of Google Earth*

- 5.11 Given the predominantly urban context of the Site frontage, then I do not consider that the provision of the new junction will have a significant impact on the character of Humber Doucy Lane.
- 5.12 In any event, development on the Appeal Site, which is allocated, will result in a certain level of change to the character of the lane, wherever the Site access is located.

Reason for Refusal 4

- 5.13 The fourth reason for refusal refers to the transition space on the northern edge of the Appeal Scheme. The various aspects of this reason for refusal are addressed under the following subheadings.

A suitable transition space is required between the new development and wider countryside along the northern edge of the application site.

- 5.14 Paragraph 1.9 of IBCDR (CD AD6) acknowledged that *'the proposals include a substantial green open space located along the countryside edge in the 'Green Trail' area, and other smaller areas like the Village Green and linear green corridors through the site' [my underlining].*
- 5.15 The approach to the treatment of the northern site boundary was similarly acknowledged by Ipswich Borough Council's Countryside and Wildlife Arboriculture Department. Para 3.3f of IBCDR states: *'The trees and linear hedgerow features that border the three parcels of development land are an integral part of the character and landscape of the area and looks to have been considered. The proposed village green & community orchard also looks positive. Roadside trees make a significant contribution to the character of new developments and the proposed tree lined spine road on the larger parcel of land is welcomed....'*
- 5.16 The reason for refusal acknowledges that the Appeal Scheme includes an area of open space along the northeastern boundary to act as a transition space between the proposed built development and wider countryside but considers that *'the transition space is however considered to be too narrow in some areas' [my underlining].*



Figure 3 Informal linear open space

- 5.17 The Council's joint Statement of Case expands upon the reason for refusal and states the intensity of use in the green buffer is not inducive to the rural character.
- 5.18 It is important to note that the boundaries of the different land uses which are shown on the parameters plan are not definitive. This is stated in the footnote

to the parameters plans, which says that the *'The precise/detailed boundaries of development parcels will be set at Reserved Matters stage'*. At the reserved matters stage, if the Council remain of the view that the transition space is too narrow in specific locations, then there is the potential to increase the depth in certain areas by varying the boundaries of the land use parcels.

- 5.19 Paragraph 1.11 of the East Suffolk Delegated Report also recognised that *'the Green Trail route is proposed to run along the north-eastern boundary of the Site and along the existing public footpath in the north of the Site to create a transition to the wider rural countryside'*.
- 5.20 In considering the need for, and extent of, a buffer or transition space, the starting point is to look at the existing nature of the Appeal Site boundary.
- 5.21 The northeastern boundary of Parcel B is clearly defined by a dense belt of vegetation which comprises a mix of scrub, outgrown hedgerows and mature trees. None of this vegetation will be lost as a result of the proposed development.
- 5.22 As the northeastern boundary of Parcel B already benefits from a robust and clearly defined boundary it is not reliant on new planting to screen or contain the proposed development.
- 5.23 The northern boundary of Parcel C has dense vegetation on it with the northeastern boundary having intermittent vegetation alongside it.
- 5.24 The Appeal Site as a whole, in part borders the neighbouring countryside and in part borders the flood lit playing fields of the adjacent Rugby Club and the railway line. The character of the boundary therefore varies, as does the existing level of activity, both at day and night, on the neighbouring land.
- 5.25 Notwithstanding the fact that the Appeal Site currently benefits from a robust and clearly defined boundary, the approach to the masterplanning of the Appeal Site has been to further strengthen the northeastern boundary of the Appeal Site by providing a broad swathe of open space that runs alongside it. This space will allow for additional planting to be introduced. It will also accommodate Sustainable Drainage Systems (SuDS) features; play areas; natural grassland; and a Green Trail route. As the site sections on the Illustrative Landscape Strategy (CD L3) show, the development envelope will be set back from the northeast boundary to varying degrees. The set back will range from a minimum of 18 metres to as much as 62 metres. There are therefore significant opportunities for additional planting within this space along with recreational and drainage features. A valuable wildlife corridor and a Green Trail will also be created.

- 5.26 Given the above factors, I consider that the depth of the green buffer along the northeast boundary is entirely appropriate and will enable a soft, semi natural, multi-functional open space to be created to the northern edge of the proposed development.

The transition space has also been designed to accommodate a number of different uses which will in turn generate a level of activity that will undermine its effectiveness as a space that successively enables a transition from the urban edge of the develop [sic] to a quieter, less intense countryside character.

- 5.27 Paragraph 3.2 of IBCDR (CD AD6) summaries the responses from the Council's various departments. Para 3.3i is from the Conservation and Urban Design department and states that 'the design focus of the creation of a quality and accessible green infrastructure along the north and east sides of the site, protecting the existing 'quiet lane' environment is evident on the plans, and supported' [my underlining].

- 5.28 In considering the function of the 'transition space' it is relevant to refer to Policy DM10 of the Local Plan. This states that 'the Council will seek to establish and extend a publicly accessible green trail around the edge of the Borough as illustrated on Plan 6 in order to address the need within the Borough for access to Natural and Semi Natural Greenspace. The green trail will provide an ecological corridor and a recreational resource for people to use. Development at the edge of the built up area will be required to provide links within the green trail as part of their on-site open space provision.'



Figure 4 Character of an informal play area

- 5.29 Plan 6 of the Local Plan (CD DP1) identifies Green Corridor D as running alongside the northwest boundary of the Appeal Site. Corridor D broadly follows the alignment of Tuddenham Road and Policy DM10 recognises that

green trails can be a recreational resource as well as providing ecological corridors.

- 5.30 The supporting text to Policy DM10 identifies that opportunities will be sought to link existing green and blue corridors into a more continuous network through the layout of new development. This objective has been one of the key components of the Appeal Scheme, with green trails both within, and on the periphery of the proposed development, linking to Green Corridor D as well as the wider footpath network.
- 5.31 It is clear from Policy DM10 that the Council are promoting the use of green trails as a recreational resource and recognise that this will include human activity.
- 5.32 The approach to the design of the linear open space on the Appeal Site boundary has been to create a semi natural edge to the development that has sufficient space for additional planting as demonstrated by the Illustrative Landscape Strategy. The linear open space also provides opportunities for a range of recreational opportunities from informal seating areas to areas where dogs can be let off their leads in a controlled manner.
- 5.33 The proposed Multi-Use Games Area (MUGA), which caters for older children, is indicatively located alongside the rugby ground, as opposed to the boundary with the neighbouring countryside. A Locally Equipped Area of Play (LEAP) will also be provided in the northern part of the Appeal Site and at the southern end, adjacent to the proposed allotments. There will also be a LEAP in the formal green space which sits at the heart of the development.
- 5.34 Whilst the masterplan is only illustrative, the properties which front onto the open space will typically be served by private drives and will be set back behind front gardens (see indicative site sections on the Illustrative Landscape Strategy (CD L3). There will therefore be a greater appearance of depth to the openness of the various open spaces to that shown on the parameter plans, with only limited traffic movement alongside this boundary and similarly little or no street lighting.
- 5.35 The proposed housing will generally front onto the linear open space providing active frontages with a strong level of passive surveillance which will be a deterrent to anti-social behaviour.
- 5.36 Given the above factors, and the extent of the established boundary planting, I do not believe that the level of activity generated within, or alongside, the transitional open space will have any material effect on the tranquillity of the neighbouring countryside. Similarly, the Appeal Scheme will not be visually intrusive.

The quality and design of the transition space is also important to help protect the heritage assets along the northern boundary and more space and planting within this buffer is considered necessary to achieve this.

- 5.37 The actual final design and quality of the transitional open space is ultimately one for the reserved matters application, but the Illustrative Landscape Strategy sets out the principles of how this space will be treated. This shows that there will be generous areas of planting, which will be of native species and that the play areas will have an informal character, with traditional timber play equipment. The SuDS features will potentially have native flora and species-rich grassland banks.
- 5.38 The potential impact of the development on the setting of the heritage assets is set out in the proof of evidence of Mr Kennington.
- 5.39 The Councils' updated Statement of Case now states that they are '*no longer intending to argue that the identified adverse impact on designated heritage assets can be avoided or materially reduced*'.



Photograph 2 Emerging development at Westerfield Residential Care Home

Reason 12. Open Space and Green Infrastructure

- 5.40 The twelfth reason for refusal states that: '*The quantum and quality of the open space proposed and identified within the Green & Blue Infrastructure Plan fails to meet the relevant policy requirements. The quantity of particular open space typologies is below the required amount identified within the Council's Public Open Spaces Supplementary Planning Document (SPD) (2017) and therefore contrary to Policy DM6 of Local Plan*'.
- 5.41 Policy DM6 of Ipswich's Core Strategy and Policies Development Plan requires open space to be in compliance with the Council's Open Space Standards as set out in Appendix 3 of that document (CD SPD7). Paragraph 9.52 also states that '*where possible, green spaces should provide for wildlife habitats designed and located so as to create a link with existing ecological networks and/or green corridors, which may include the proposed green trail around Ipswich for*

sites on the edge of the Borough'. Once again, the Council acknowledge that green spaces can be multi-functional.

- 5.42 An Open Space Assessment was produced by the appellant and submitted with the planning application. This showed that there was a surplus of playing fields and allotments in the local area and therefore there was no need to provide them on site.
- 5.43 The distribution of the various types of open space within the development is shown on the Open Space Typology Plan in **Appendix A**. The plan has been annotated to show the distance from the play areas and the walking times which are derived from the standards set out in The Fields In Trust Guidance for Outdoor Sport and Play (CD L5).
- 5.44 Table 5 of this evidence sets out the requirements in Annex 3 of the Ipswich Core Strategy and Policies Development Plan Review ('ICSPDP') and quantifies the open space need for a development of 660 houses, based on an average household occupancy of 2.4 persons. The requirement for allotments and outdoor sports facilities are not included in this table as there is a surplus in the local area. However, for completeness I have added a footnote that shows what that requirement would be and how there would in any event be a surplus in open space.
- 5.45 Although no formal playing fields are being provided in the Appeal Scheme, the Open Space Typology Plan identifies an area of 0.08 ha for Provision for Young People. This area is in excess of the policy requirement for this type of play space. The Illustrative Landscape Strategy also shows a kickabout space alongside the space for Young People and additional youth space. At the design stage there is flexibility to accommodate a variety of use in this area which could include more formal sports facilities such as tennis courts or basketball courts etc.
- 5.46 Paragraph 5.37 of IBCDR acknowledges that the submitted Open Space Assessment identifies an over provision of sports facilities and allotments.
- 5.47 Paragraph 5.38 then acknowledges that *'the total quantum of open space proposed is in excess of the total open space required by policy'*.
- 5.48 ICBDR then goes on to say that certain typologies are underprovided, such as Parks and Gardens. It makes reference to the table, which includes outdoor sports facilities and allotments, but does not say there is a requirement for outdoor sports facilities or allotments to be provided on the Appeal Site.

| Table 5 Ipswich Standards for the provision of open space, sports, and recreation facilities. | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|--------------------------------------|----------------------|------------------------|
| Accessible Open Space | Standard (ha per 1000) | Requirement for 660 dwellings | Provided (ha) | Surplus/deficit |
| Provision for children's play | 0.08 ha | 0.13 ha | 0.13 ha | 0 |
| Provision for young people | 0.04 ha | 0.06 ha | 0.08 ha | +0.02 |
| Parks and Gardens | 1.16 ha | 1.84 ha | 0.80 ha | -1.04 |
| Amenity Green Space | 0.48 ha | 0.76 ha | 0.87 ha | +0.11 |
| Natural and semi natural | 1.53 ha | 2.42 ha | 9.56 ha | +7.14 |
| Total | | 5.11ha | 11.44 ha | +6.33 ha |
| <p><i>*The findings of the Open Space Assessment carried out by the applicant shows that there is a surplus of playing fields and allotments in the local area and these are therefore not provided on site. If they were to be required an additional 2.9 ha of land would be needed (0.65ha allotments & 2.25 ha playing fields). The total open requirement would then be 8.11 ha with the overall overprovision of open space on the Appeal Site being 3.33 ha.</i></p> | | | | |

- 5.49 The rationale for providing a significantly greater proportion of natural and semi natural green space as opposed to formal parks and gardens, is to allow a generous and contextually appropriate green edge to be created to the development that has the capacity to accommodate a variety of uses, within a Green Trail.
- 5.50 At the detailed design stage there will also be opportunities to create more formal incidental pockets of open space within this area if it is felt appropriate.
- 5.51 Policy DM6 of the Ipswich Local Plan acknowledges that 'There may be circumstances where development would more suitably accommodate greater provision of one typology at the expense of another. Such circumstance will be considered on their merits'.
- 5.52 Given the context of the Appeal Site and its relationship to the neighbouring green corridor, then I consider that greater emphasis should be placed on providing a larger proportion of informal open space rather than formal. Nevertheless, it should be noted that the overall quantum of open space is

significantly greater than the policy requirement and that there is flexibility to reallocate some of the uses at the reserved matters stage if it is felt necessary.

- 5.53 The need for other provisions, such as playing fields and allotments, is dealt with in the planning proof of evidence as Phase2Planning prepared the Open Space Assessment that accompanied the planning application.

The locations of LEAP and MUGA areas are generally located to outer edges of the development within the green edges. There is a concern that that these will not be fully integrated within the development and will lack surveillance and become isolated from the main residential areas.

- 5.54 In terms of the lack of surveillance of the play areas, this is clearly not the case, as the play areas have, in every instance, been located alongside the proposed pedestrian routes which pass through the Appeal Site. While I appreciate that the layout is only illustrative, it has nevertheless been configured so that the proposed neighbouring properties also overlook the play areas and as a result will also provide a strong element of passive surveillance through the provision of active frontages. This is apparent from the Illustrative Landscape Strategy (CD L3) which has been annotated to show a 30m setback for the MUGA for the residential envelope and a 20m setback for the LEAPs. These set back distances are derived from the Fields in Trust Guidance and that in the Ipswich Open Space SPD of 2017.
- 5.55 In terms of isolation of the play spaces, I do not consider that that is a fair assessment of their indicative locations as they are distributed throughout the development to allow all future residents easy access to a play space and in certain instances, such as the LEAP at the south eastern end of the Appeal Site, and the MUGA which lies alongside the rugby pitch, will also be accessible for existing residents in this part of Ipswich.
- 5.56 Ultimately, the exact location of the play areas is for the reserved matters application, but the plan in **Appendix A** show that they all fall comfortable within the maximum walking distances set out in the Fields in Trust Guidance which is referenced under Policy SCLP8.1 of the East Suffolk Local Plan. Ipswich Council's Public Open Space SDP has similar access requirements but the walking times that are provided are somewhat different to those in the Fields In Trust Guidance. For example, Fields In Trust identify a 10 minute walk as equating to 800 metres whereas Ipswich define it as 480 metres, which is considerably shorter. However, setting the differences aside, the Plan in Appendix A shows that the play areas are all within reasonable walking distances and in many cases will also be readily accessible to existing residents in the local neighbourhood.

The location and distribution of certain open spaces is also considered unacceptable in terms of recreational space and childrens spaces being

limited to linear routes and transitional spaces at the periphery of the development. More generous spaces should be integrated within the residential parcels of the development.

- 5.57 The Planning Proof of Evidence explains that because of the time scales the LPA set for determination of the planning application, there was no opportunity to amend the planning application to respond to the comments received from the local authority. The decision notice was also based on the originally submitted application. This approach is highly unusual as design is ultimately subjective and it is normal for schemes to evolve and change as a result of collaborative dialogue with a planning authority and the various consultees.
- 5.58 I have already explained the rationale behind the location of the open space and play areas and the manner in which they will be accessible to both new existing residents alike.
- 5.59 I consider that the approach to the location and distribution of the open space is appropriate and the parameters plan shows that there are play spaces both within the development and on the periphery. At the heart of the development is a LEAP, which sits within a formal central green, which is framed by properties. On the periphery of the development, there are also several LEAPs, a MUGA and kick about spaces which sits alongside a green trail which connects to the wider footpath network.
- 5.60 In terms of the need for more generous areas of open space being required I have already referred to Table 1 which shows that the open space requirements for the development have been exceeded in any event.

To protect the sensitive character of Humber Doucy Lane a larger set back of the development from Humber Doucy Lane should be shown.

- 5.61 The reason for refusal describes Humber Doucy Lane as having a sensitive character and as such a larger set back should be provided.
- 5.62 The section of Humber Doucy Lane which borders the Appeal Site does not fall within a Conservation Area and does not contain any listed buildings. The lane does not have an informal rural character as it is of a uniform width with concrete upstand kerbs on the southern edge with linear parking bays in places alongside the carriageway. There is also street lighting and pole mounted overhead cables in some areas.
- 5.63 All of the properties which front onto the road are from the post-war era and comprise a mix of terraced and semi-detached houses and bungalows (see Photograph 2). In places the property boundaries lead up to the back edge of the footway that runs alongside the southern edge of the road and in other places there is a grass verge.

- 5.64 The northern side of Humber Doucy Lane is currently largely defined by an unmanaged hedgerow with intermittent tree cover. At roughly the midpoint of the northern boundary is the access to the car park which serves Ipswich Rugby Club.
- 5.65 The fact that the existing character of the road is of limited intrinsic townscape or countryside value does not mean that the development should not respond to it in a sensitive manner nor seek opportunities to enhance it.
- 5.66 The parameters plan shows that the development envelopes will be set back from the Humber Doucy Lane boundary by between 10 and 20 metres. This does not mean the façades of the proposed properties will be that distance from the boundary as they will typically face onto the southern boundary, have front gardens, and be served by private drives. This setback will, for the most part, be greater than the setback of the existing properties on Humber Doucy Lane. In some instances it may potentially be similar although in all instances, save for the access points into the Site, there will be a treed hedgerow on the Site frontage.
- 5.67 The swathe of open land that is to be provided along the Humber Doucy Lane frontage will allow most of the existing hedgerow to be retained and enhanced with additional planting. There will also be swales in places and informal swathes of grassland. As a result of this approach, the development will read as natural extension to the existing settlement and will have a soft green interface with it. I consider that is an appropriate approach and that it is unnecessary to set the development back from the road by a significant margin as we want it to read as an integral part of the existing neighbourhood and not as a free-standing development, detached from the existing neighbourhood.



Photograph 3 Central section of Humber Doucy Lane

- 5.68 Given that the proposed housing will front onto Humber Doucy Lane, that it will be no greater than 2 storeys, and that the vast majority of the boundary vegetation will be retained and strengthened, then I consider that it will address Humber Doucy Lane in an appropriate manner.

6.0 CONCLUSION

- 6.1 The Appeal Site is not covered by any statutory or non-statutory landscape designations and is allocated for development and supporting infrastructure in both the Ipswich and East Suffolk Local Plans.
- 6.2 The Site already benefits from clearly defined, and for the most part, heavily vegetated boundaries. The vegetation on these boundaries will be retained and strengthened with the exception of that which is required to be removed to accommodate the vehicular and pedestrian accesses into the Site.
- 6.3 It is inevitable that some hedgerows would need to be lost to bring this allocated site forward. Nevertheless, compensatory planting will be carried out on the back edges of the new visibly splays. A landscape and ecological management plan will also be put in place to ensure that the new, and existing, hedgerows are maintained in an appropriate manner in the long term.
- 6.4 The Illustrative Masterplan has been configured in such a manner as to create an appropriate green interface with existing development in this part of Ipswich. The proposed housing on the Humber Doucy Lane frontage will be of a similar scale to existing housing and will be set back behind a swathe of open space. The design intention is for the Appeal Scheme to read as an integral part of Ipswich rather than a free standing development which is detached from the existing neighbourhood. Nevertheless, the Appeal Scheme will have a sensitive green boundary which will accommodate additional planting. It will also have a network of footpaths which will connect to the eastern part of Ipswich and to the wider countryside beyond.
- 6.5 Similarly, the Appeal Scheme will have an appropriate relationship with the wider countryside. A generous green buffer is provided on the boundary of the Site where it adjoins the wider countryside. This buffer will strengthen the existing vegetation on these boundaries and accommodate a Green Trail, together with a range of passive and active recreational opportunities.
- 6.6 The green buffer to the wider countryside will also contain drainage features, such as swales and drainage basins. Whilst the design of these feature is ultimately one for the reserved matters application the intention is that they will have an informal character, such as wildflower grassland banks and will also be designed in such a manner as to maximise their value for wildlife.
- 6.7 As one of the objectives of the allocation is to create a Green Trail on the periphery of the development then it will inevitable result in pedestrian movement on the perimeter of the Site, which is desirable. But I do not consider that this will result in any significant impact on the tranquillity of the wider countryside because of the nature of the existing boundary vegetation, the provision of additional planting, and the depth of the buffer.

- 6.8 The Appeal Scheme has also be designed to have houses, which are served by private drives, facing onto the green buffer. By adopting this approach it will minimise traffic movement in this area and provide an element of passive surveillance.
- 6.9 At the heart of the development there will also be formal green space which will be framed by housing and connected to the wider footpath network through a series of linear green spaces. To have variety in the character of the green spaces in a development of this size I believe is desirable. There will also be a community orchard at the eastern end of the Site.
- 6.10 A range of play areas will be provided throughout the development and these will be readily accessible and provide opportunities for children of all ages to play. They have been located both within the body of the Site and also on the periphery and they will all benefit from a good level of passive surveillance.
- 6.11 The Appeal Scheme will read as a natural extension to Ipswich and will deliver a robust green boundary between the development and the wider countryside. The swathes of open space on the boundaries of the Site will also deliver benefits for wildlife as well as a range of passive and active recreational opportunities for new and existing residents alike.
- 6.12 As a result of configuration of the appeal scheme and the strengthening of the external boundaries of the Site, the Appeal Scheme will have a strong sense of place and the impact of the development on the wider countryside will be extremely limited.

Appendix A



LEGEND

- Application Boundary
- Amenity Green Space: **0.87 ha**
- Parks & Gardens: **0.80 ha**
- Natural & Semi Natural: **9.56 ha**
- Provision for Children's Playspace: **0.13 ha**
- Provision for Young People: **0.08 ha**



| Rev | Date | By | Description |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|-------------------|-------------|
| CSA environmental Dixies Barns, High Street, Ashwell, Hertfordshire SG7 5HT T 01462 743647 E ashwell@csaenvironmental.co.uk W csaenvironmental.co.uk | | | |
| Project Land north west of Humber Doucy Lane, Ipswich | | | |
| Title Open Space Typology Plan with play area walking distances | | | |
| Client Hopkins Homes & Barratt David Wilson | | | |
| Scale 1:2000 @ A1 | | Drawn CC | |
| Date October 2024 | | Checked GC | |
| Drawing No CSA/603/23 | | Rev - | |



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