

Summary of Landscape Evidence

Land East of Humber Doucy Lane, Ipswich

December 2024

1.0 SUMMARY

- 1.1 This appeal is in respect of a Hybrid Planning Application which comprises a full planning application for vehicle, cycle and pedestrian access to and from the Site and an outline planning application for a mixed-use development of up to 660 dwellings with supporting infrastructure.
- 1.2 The planning application included a series of parameters plans and a Design and Access Statement (DAS) which summarises the approach to the development of the Site.
- 1.3 An Illustrative Landscape Strategy was also submitted with the application to show the intended approach to the landscape treatment of the Site. It also identified the potential locations of the play areas, 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.
- 1.4 The landscape evidence addresses the landscape aspects of the fourth reason for refusal which acknowledges that a transition space has been provided along the northeast boundary of the Site, but states that it is 'considered to be too narrow in some areas'. The reason for refusal goes on to say that as the transition space had been designed to accommodate a number of different uses it would generate a level of activity that would undermine its transition to a quieter, less intense countryside character.
- 1.5 The twelfth reason for refusal is concerned with the provision and distribution of open space and states that the quantity of particular open space typologies is below the required amount identified within the Ipswich Council's Public Open Spaces Supplementary Planning Document of 2017 and therefore contrary to Policy DM6 of the Local Plan. It also alleges that 'the location and distribution of certain open spaces is considered unacceptable in terms of recreational space and children's spaces being limited to linear routes and transitional spaces at the periphery of the development'.
- 1.6 The twelfth reason also considers that a larger set back should be provided to Humber Doucy Lane and that 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'.

- 1.7 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.

Context

- 1.8 The Appeal Site borders the northeastern edge of Ipswich with the greater part of the Appeal Site facing onto Humber Doucy Lane. The village of Rushmere St Andrew is a short distance to the east with the village of Tuddenham approximately 1.5 kilometres to the north. The northern part of the Site borders the East Anglia Railway which is in a cutting at this point.
- 1.9 The Appeal Site extends to 31.52 hectares and falls within the administrative areas of Ipswich Borough Council ('IBC') and East Suffolk Council ('ESC'), with the greater part of the Appeal Site within Ipswich Borough. The Site is allocated for residential development and supporting infrastructure.
- 1.10 As set out in the Planning Evidence of Mr Coleman, there were pre-application discussions with both planning authorities, but the planning applications were refused on the 4th June 2024, the day on which IBC's 13 week statutory application period ended.

Site Description

- 1.11 The Appeal Site comprises three irregular-shaped fields, which are currently actively farmed; part of a playing field; and a small area of plantation woodland. There are no buildings within the Site. Structural vegetation is largely confined to field boundaries.
- 1.12 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, from the post-war era. These properties front onto the lane, with development to the south of them extending in depth into the urban area of Ipswich.
- 1.13 To the immediate northeast and east of the Appeal Site are a number of buildings, including the Grade II Listed Allens House and Laceys Farmhouse, both of which are set within heavily vegetated grounds. Westerfield House, which is also listed, is indented into the western part of the Site. The curtilage of that property is currently being developed for 147 assisted living apartments and 92 parking spaces.

- 1.14 Tuddenham Lane, which is also designated as a Quiet Lane, runs alongside the northeastern boundary of the Site and is a single-track lane which is heavily vegetated on both sides.
- 1.15 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.
- 1.16 The northwestern corner of the Appeal Site borders Tuddenham Road with the Greater Anglia Railway occupying a cutting on the northern edge of the Appeal Site.
- 1.17 The wider countryside to the north of the Site comprises a mix of irregular shaped arable fields which are typically bound by unmanaged hedgerow with intermittent tree cover. There are also areas of woodland, most notably along the River Flynn corridor.
- 1.18 The Appeal Site is relatively flat with the countryside to the north gently undulating.

Statutory and Non Statutory Designations

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

Public Rights of Way

- 1.20 The Site is crossed by two public footpaths with a third footpath running alongside the eastern boundary of Parcel B.

Tree Preservation Orders

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

Visibility

- 1.22 The nature and extent of the boundary vegetation is such that the Appeal Site is generally screened from the wider countryside with opportunities for views into the Site largely confined to the neighbouring roads/lanes, public footpaths and properties which border the Site.
- 1.23 There are some opportunities for views, where breaks in the boundary vegetation occur, from the section of Tuddenham Road which runs alongside the northwestern Site boundary and similarly from Humber Doucy Lane. There are also views from Seven Cottages Lane, which is also designated as a Quiet Lane.

- 1.24 There are some views into Parcel B from Westerfield Residential Care Home and the properties at Tuddenham Road Business Centre.
- 1.25 Middle distance views from public footpath Rushmere 1A, to the north of the railway, are generally screened by intervening vegetation although glimpsed views of the higher ground of Parcel B are possible.
- 1.26 Views from public footpath Rushmere 48, further to the east, are screened by the trees and hedgerows which border the fields that lie between the footpath and the Site.
- 1.27 There are also some opportunities for private views of the Site from the properties which lie to the south of Humber Doucy Lane and other properties which border it.

Appeal Scheme

- 1.28 The findings of the landscape and ecological assessments, along with other technical inputs, have informed the configuration of the illustrative masterplan and illustrative landscape strategy. The parameter plans make it clear that the locations of the play areas are indicative and similarly, that the detailed boundaries of the development parcels, will be defined at the reserved matters stage.
- 1.29 The approach to the development of the Appeal Site can be summarised as:
- Vehicular access off Humber Doucy Lane and Tuddenham Road with housing set back from these boundaries behind retained and enhanced boundary vegetation and swathes of open space;
 - Creation of a substantial Green Trail route along the northern edge of the Site within a green corridor which will accommodate SuDS features; wildflower meadows; play areas; and new planting.
 - Provision of a formal Central Village Green at the heart of the development which will also accommodate a LEAP;
 - A series of green corridors within the development and provision of street trees along the main spine road.
- 1.30 The landscape-led approach to the proposed development was acknowledged by IBC's Conservation and Urban Design Officer and is summarised in Ipswich Borough Council's Delegated Report ('IBCDR'). Paragraph 3.3i of the report states:

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. The 'village green' concept, in principle is supported, however the

conceptual layout raises concerns (particularly relating to the Humber Doucy Lane side of the development) including: i) emphasis on the rural and listed building setting of the site detracts from the existing semi-rural setting of Humber Doucy Lane. [my underlining].

- 1.31 Paragraph 3.3f of the Delegated Report also contains the response from the Countryside and Wildlife – Arboriculture Department, which similarly acknowledged:

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. [my underlining].

- 1.32 It is apparent for these two consultation responses that the approach to the structure of the landscaping and open space within the Appeal Scheme was considered appropriate.

Impact on Landscape features

- 1.33 The majority of existing boundary vegetation will be retained except for that which requires removal to create the access points into the Site. Compensatory planting can be carried out to mitigate for these losses. No TPO trees will be affected and overall, there will be a significant increase in tree and hedgerow cover within the Site.

Impact on Character of the Site

- 1.34 The character of the Site will inevitably change from that of arable farmland and a playing field to a medium density residential development that would be set within a green framework. The Site boundaries are already clearly defined and well vegetated and separate the 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.

Specific matters identified in Reasons for Refusal

Third Reason for Refusal – Impact of main access from Humber Doucy Lane

- 1.35 The third reason for refusal was primarily concerned with highways matters but it did also highlight the loss of hedgerow and the alleged adverse impact on the character of that part of Humber Doucy Lane.

- 1.36 The Updated Statement of Case by IBC and ESC did however withdraw this allegation. For completeness, the topic is nevertheless addressed in my main proof of evidence but not repeated here as it is no longer being pursued by IBC.

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

- 1.37 The fourth reason for refusal considers that the transition space was only too narrow in certain places. It is important to note that as layout is also a reserved matter, the boundaries of the different land uses which are shown on the submitted parameters plan are not definitive and that the precise boundaries of the development parcels will be set at the reserved matters stage when the detailed site layout is prepared.
- 1.38 The northern boundary of the Appeal Site is already defined by a heavily vegetated boundary. Nevertheless, the approach to the development has been to further strengthen and enhance this boundary and to create a generous green corridor along it to facilitate an appropriate transition to the wider countryside. The proposed development envelope will be set back from the northeast boundary by a minimum of 18 metres and in places will be as much as 62 metres. Therefore, there are 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.
- 1.39 The reason for refusal also says that the transition space has 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 transition from the urban edge of the development to a quieter, less intense countryside character.
- 1.40 In allocating the Site, one of the objectives was to create a Green Trail along the northern boundary of the Site. It is inevitable therefore that with the development in place there would be a greater level of activity on the northern part of the Site than exists at present. The addition of uses, such as children's play areas and areas for dogs to be let off leads, will not, in my opinion, generate a significant additional source of noise or activity that would be discordant with a typical residential development, such as that for which the site is allocated. In any event, the depth of the buffer is of a sufficient depth to allow for additional planting to largely mitigate the effect.

Twelfth Reason for Refusal - The quantum and quality of the open space proposed and identified within the Green & Blue Infrastructure Plan fails to meet the relevant policy requirements

- 1.41 Paragraph 5.54 of ESCDR acknowledges that 'The total quantum open space proposed is in excess of the total open space required by policy'. The table contained within that report identified the overall open space requirement as 8.11 hectares with the amount proposed being 11.44 hectares.
- 1.42 The concern with the under provision is that certain typologies are not provided i.e. outdoor sport provision, allotments, and that the area for parks and gardens are smaller than required. The Open Space Assessment that was submitted with the planning application identified an over provision of these facilities in the local area and hence that there was no need to provide these on the Appeal Site. As the Open Space Assessment was undertaken by Mr Coleman that specific topic is addressed in his evidence.
- 1.43 The Delegated Report also notes that the Parks and Gardens typology has been underprovided by 1 hectare. This is correct but the approach to the design of the Appeal Scheme has been to make greater provision for semi natural green space than the policy requires as the Appeal Site borders the neighbouring countryside and a Quiet Lane.
- 1.44 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*'.
- 1.45 Given the context of the Appeal Site, I consider that greater emphasis should be placed on providing a higher proportion of informal 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.
- 1.46 The Councils express their concern that the play areas will not be fully integrated within the development and will lack surveillance.
- 1.47 I appreciate that the planning application is in outline form only but the play areas have nevertheless been located in places where they will benefit from surveillance from footpath users and will also be overlooked by neighbouring properties that front the various open spaces.

The location and distribution of certain open spaces is also considered unacceptable in terms of recreational space and children's 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.

- 1.48 Ultimately, the exact location of the play areas is for the reserved matters application, but they all fall comfortably 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. Many of the play areas will also be readily accessible to existing residents in the local neighbourhood.

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

- 1.49 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 road 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.
- 1.50 The parameters plan shows that the development envelopes will be set back from Humber Doucy Lane boundary by between 10 and 20 metres.
- 1.51 The swathe of open land that is to be provided along the Humber Doucy Lane frontage will allow the existing hedgerow to be retained and enhanced with additional planting. I consider this to be an appropriate approach and that it is not appropriate to set the development back further from the road by a significant margin, as we want it to read as an integral part of the local neighbourhood and not as a free-standing development.

Conclusion

- 1.52 The illustrative masterplan has been configured in such a manner as to create a development with a distinct sense of place and one which delivers a Green Trail which has strong links to the wider countryside and the existing urban area of Ipswich.
- 1.53 Significant areas of open space have been provided within the development and on the Site boundaries. These areas will provide both passive and active recreational opportunities, together with benefits for wildlife. At the reserved matters stage, the design, quality and precise location of these areas will be further refined.
- 1.54 The Appeal Site already benefits from robust and clearly defined boundaries. These boundaries will be further reinforced and as a result the impact on the wider countryside will be minimal. The Appeal Scheme will also have an appropriate relationship to neighbouring development.