



Town & Country Planning Act 1990

APPEAL UNDER SECTION 78(1)

By

Barratt David Wilson and Hopkins Homes

At

Land Between Humber Doucy Lane and Tuddenham Lane, Humber Doucy Lane,
Ipswich, Suffolk (also referred to as: Land north-east of Humber Doucy Lane, Humber
Doucey Lane, Ipswich)

Proof of Evidence

By

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Planning Inspectorate Refs: APP/R3515/W/24/3350674 &

APP/X3540/W/24/3350673

IBC Ref: 24/00172/OUTFL ESC Ref: DC/24/0771/OUT

20th December 2024

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1.0 Introduction

- 1.1 My name is Ruth Chittock, and I am employed by East Suffolk Council as Senior Landscape Officer. I hold an MA in Landscape Architecture and an MSc in Arboriculture and Urban Forestry. I am an Associate Member of the Landscape Institute. I have worked in the landscape profession for around 8 years including both the public and private sectors. I have been employed by this Council since April 2023.
- 1.2 The evidence which I have prepared and provide for this appeal (reference: APP/R3515/W/24/3350674 & APP/X3540/W/24/3350673) is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.
- 1.3 The proposal subject to this appeal is a Hybrid Application with Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site, and 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 on land at Humber Doucy Lane, Ipswich, Suffolk.
- 1.4 The site is split between two local planning authority areas, Ipswich Borough Council and East Suffolk Council, which resulted in two identical planning applications being submitted (24/00172/OUTFL and DC/24/0771/OUT respectively). I have been instructed to prepare this proof of evidence on behalf of both authorities.

1.5 On the 4th of June 2024 East Suffolk Council issued a refusal of planning permission. The decision notice contained the following reasons for refusal relevant to this proof of evidence:

3. *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 to a quieter, less intense countryside character.

...

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. ...The proposals are therefore considered to be contrary to the NPPF (paragraphs 135 and 139), Local Plan policies SCLP12.24 (Land at Humber Doucy Lane), SCLP10.4 (Landscape Character) and SCLP11.1 (Design Quality), and Rushmere St Andrew Neighbourhood Plan Policy RSA 9 (Design Considerations).

10. 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 East Suffolk's emerging Healthy Environments SPD and therefore contrary to Policy SCLP8.2 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 Policies SCLP12.24 (Land at Humber Doucy Lane), SCLP3.5 (Infrastructure Provision), SCLP8.2 (Open Space), SCLP11.1 (Design Quality), and Neighbourhood Plan Policies RSA 9 (Design Considerations) and RSA 11 (Open Space, Sport, and Recreation Facilities).

- 1.6 On the 4th of June 2024 Ipswich Borough Council issued a refusal of planning permission. The decision notice contained the following reasons for refusal relevant to this proof of evidence:

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 to a quieter, less intense countryside character.

...

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. ...The proposals are therefore considered to be contrary to the NPPF (paragraphs 135 and 139) and Local Plan policies IPSA4, DM12 and DM13.

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).

1.7 This proof of evidence will serve to defend the Councils' positions by addressing the following issues:

- The quality of open space provided at the site.
- The transition from urban edge to rural countryside; and
- Potential landscape and visual impacts as a result of the development.

1.8 This document should be read in conjunction with James Meyer and Lisa Evans' proofs of evidence, which provide further information on the quantum of open space provided at the site and the provision of SANG.

2.0 Site and Location

2.1 The site is located to the north-east of Ipswich, which is Suffolk's County Town. The River Orwell runs through the town and out to the estuary in the south-east, forming part of the Suffolk & Essex Coast & Heaths National Landscape. The town is bounded by arable farmland on most sides and a reasonable PRoW network provides residents on the periphery with access to the countryside.

- 2.2 The site straddles the boundary between two local authority areas: Ipswich Borough Council and East Suffolk Council. Land within the East Suffolk Council area includes that which is located along the north-eastern boundary of the site, where it borders Tuddenham Lane and heritage assets Allen's House and Lacey's Farmhouse. The remainder of the site is located within the Ipswich Borough Council area, including the separate site parcel adjacent to Seven Cottages Lane.
- 2.3 The site is also in close proximity to the village of Rushmere St Andrew; part of the site to the south of Tuddenham Lane is located within the Parish Boundary.

3.0 Wider Landscape Character

- 3.1 The north-eastern part of the site which lies within the East Suffolk Council boundary is located in the *N2 Culpho and Westerfield Rolling Farmland* landscape character area, as set out in the Suffolk Coastal Landscape Character Assessment [L2], which comprises the elevated farmland on either side of the Fynn Valley. It is an area of flat and gently rolling farmland studded with oak trees and lined with ancient hedges. Passing over the open agricultural plateaus down into the wooded valleys is a key part of the experience of the landscape here. The area acts as the rural setting to the northern edge of Ipswich and provides important separation between the town and surrounding villages.
- 3.2 The site is located within the *Land Northeast of Ipswich IP2* peripheral area, as set out in the Settlement Sensitivity Assessment Volume 1 [L1] prepared jointly by the Councils, which comprises the landscape between the existing urban edge of Ipswich and the Fynn Valley to the north. The value of this area lies in the strategic role it plays in

connecting the urban areas of Ipswich to the rural river valley beyond. Landscape sensitivity arises from the *'the historic landscape patterns that lie immediately beyond the urban edge, and the narrow shoulder of elevated land that separates Ipswich from the Fynn Valley'* (p.17).

- 3.3 The Settlement Sensitivity Assessment Volume 1 [L1] identifies 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'* (p.18).
- 3.4 This peripheral area plays a strategic role in *'connecting urban areas of Ipswich with the high quality river valley landscapes'* and it functions as an *'important corridor of land connecting people and distinctive landscapes'* (p.17). The connection between urban and rural landscapes is of particular importance here, but at present, Humber Doucy Lane marks an abrupt edge to existing development. Perceptually, this creates a stark contrast between the town and the wider rural landscape, and there are opportunities to resolve this via a *'strengthening of the landscape structure'* and *'softening of the urban edge'* (p.17).
- 3.5 The information provided in the Settlement Sensitivity Assessment Volume 1 [L1] was an important basis for the development of the two local authority policies covering the application site, SCLP12.24 and Policy ISPA4, which respectively require the provision of a soft edge to the urban area through the provision of significant landscaping and 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.

4.0 Relevant Policy

4.1 Paragraph 135 of the NPPF **[N2]** states that:

'Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience' (p.39).

4.2 A successful layout and effective landscaping are key to the creation of an attractive development, whilst also playing a significant role in ensuring that development is sympathetic to local character, including the surrounding landscape setting. This proof of evidence will highlight areas where the proposals fail to achieve this.

4.3 Paragraph 139 of the NPPF **[NP2]** states that:

‘Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents’ (p.41).

- 4.4 Both the Ipswich Borough Council and East Suffolk Council local plans contain a suite of policies concerning the successful design of development sites, alongside a range of supplementary planning documents providing further guidance. The applicant has failed to demonstrate that they have met all policy requirements, and this proof of evidence will identify relevant points of failure.
- 4.5 Policy SCLP10.4 of the Suffolk Coastal Local Plan **[DP2]**, which covers the former Suffolk Coastal area, requires that development proposals *‘be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018)’* and that they *‘secure the preservation and appropriate restoration or enhancement of natural, historic or man made features across the plan area as identified’* (p.176) through these assessments.
- 4.6 As set out in Section 3.0, these assessments contain important information regarding existing landscape character, alongside guidance to ensure that potential harm from development is minimised. As will be evidenced further through this proof, the proposed development does not pay adequate heed to these assessments and therefore does not satisfy policy requirements.
- 4.7 Policy SCLP12.24 of the Suffolk Coastal Local Plan **[DP2]** refers to the Humber Doucy Lane site allocation and sets out the following requirements for development:

- 'a) Delivery of a high quality design incorporating a mix of housing types, including affordable housing on-site;*
- b) A site-specific Flood Risk Assessment will be required;*
- c) Provision of 0.1ha of land for an early years setting if needed within the part of the site in East Suffolk;*
- d) Contribution to the creation of a 'green trail' around Ipswich and provision of on-site open space;***
- e) Provision for sufficient primary school spaces;*
- f) Provision of a soft edge to the urban area through the provision of significant landscaping;***
- g) Promotion of the use of sustainable modes of transport;*
- h) An archaeological assessment will be required;*
- i) Design, layout and landscaping of the development should be carefully designed to preserve the setting of the nearby listed buildings; and*
- j) A project level Habitats Regulations Assessment will be required.'***
(emphasis added) (p.273)

- 4.8 Criterion d) and f) are of particular relevance to this proof of evidence, which will demonstrate that the proposed development does not achieve adequate provision of on-site open space and does not provide adequate space for significant planting across the entirety of the site to ensure a softening of the urban edge. The policy was informed by guidance set out in the Settlement Sensitivity Assessment.
- 4.9 Policy SCLP12.24 also states that: *'Development will only come forward as part of a masterplanned approach with land in Ipswich Borough'* (p.273).

- 4.10 The relevant cross boundary policy within the Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review **[DP1]** is Policy ISPA4, which states that:

'23.28ha of land at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, is allocated for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated in Policy SCLP12.24 of the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site. 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.

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.

Development will be expected to comply with the following criteria:

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;***

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;

d) A site specific Flood Risk Assessment will be required;

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):

i. Primary school places and an early years setting to meet the need created by the development;

*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;

iii. A project level Habitat Regulations Assessment will be required and Suitable Alternative Natural Greenspace (SANGs);

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;

v. Transport measures including:

- highway and junction improvements on Humber Doucy Lane and Tuddenham Road;***
- walking and cycling infrastructure to link the site to key social and economic destinations including the town centre, and local services and facilities;***
- public transport enhancements; and***
- appropriate transport mitigation measures that arise from demand created by the development, in line with the ISPA Transport Mitigation Strategy;***

vi. Development will need to be phased and delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure sufficient primary school capacity is provided to meet demand generated from the strategic allocation at the northern end of Humber Doucy Lane;

vii. The development will be triggered by the ability to provide the necessary primary school capacity on the

Red House element of Ipswich Garden Suburb or an agreement between the landowner and Suffolk County Council, as the Education Authority, to provide a primary school on the Humber Doucy Lane development;

viii. As part of the master planning work, the opportunity for the provision of convenience retail on site should be assessed in order to reduce travel demand, taking into account any effects on the viability of existing local retail facilities; and

ix. A financial contribution to off-site healthcare facilities’ (p.43-44)

4.11 Criterion b), f)ii, F)iii and f)iv are of particular relevance to this proof of evidence, which will demonstrate that the proposed development has not achieved a satisfactory transition between the urban edge of Ipswich and the more rural landscape character of East Suffolk, and has not delivered the required quantity and quality of open space, in particular SANG.

4.12 Policy RSA2 of the Rushmere St Andrew Neighbourhood Plan **[DP3]** supplements the relevant local plan policies with respect to the Humber Doucy Lane allocation site, stating that *‘development proposals should make provision for a significant reinforcement of existing planting and additional native tree planting of local provenance along the north-eastern / eastern boundary of the site adjoining Tuddenham Lane and in the vicinity of existing residential properties off Tuddenham Lane. In particular, the planting scheme should be designed on the premise of maintaining the separation of the enlarged urban area of Ipswich with the rural and tranquil nature of this part of the Neighbourhood Area and proposals should be accompanied by a management plan which will ensure the successful*

establishment of the new planting and its continued growth through to maturity.’ (p.15)

- 4.13 The significant reinforcement planting required by this policy can be included as part of the transition requirement of ISPA4 criterion (b), but in order for it to be properly delivered, there will be a significant spatial requirement, and this should be a key factor in determining the overall space provided along the northern and north-eastern boundaries of the site. This proof of evidence will show that the applicant has not allowed adequate space for this to be achieved.
- 4.14 Regarding the listed policy requirements, it can be considered that the key Landscape design principles for the development (as required by Policy ISPA4, Policy SCLP12.24 and RSA2) include:
- a) Significant landscaping to soften the urban edge, as required by criterion f) of Policy SCLP12.24, criterion f) iv. of Policy ISPA4 and Policy RSA2;
 - b) 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, as required by criterion (b) of Policy ISPA4
 - c) Adequate open space provision, as required by criterion b of Policy SCLP12.24; and criterion f(ii) of Policy ISPA4
 - d) Contribution to the ‘Green Trail’ around Ipswich, as required by criterion d) of Policy SCLP12.24 and criterion f) ii. of Policy ISPA4;
 - e) Provision of Suitable Alternative Natural Greenspace (SANG), as required by, as required by criterion f) iii. of Policy ISPA4;
 - f) Protection of existing trees, as required by criterion e) of Policy ISPA4; and
 - g) Acknowledgement and incorporation of the Ipswich Wildlife Audit (2019) recommendations, in particular that existing hedgerows

should be retained and enhanced by additional planting, as required by criterion f) iv. of Policy ISPA4.

- 4.15 At the time of the application, East Suffolk Council had issued a final draft of the Healthy Environments Supplementary Planning Document **[SPD6]**. This document was adopted in June 2024 and sets out relevant guidance regarding open space requirements and green infrastructure delivery on development sites in the district. The guidance provided in this document is material to the successful masterplanning of the site as a whole and is therefore of relevance to both the East Suffolk Council and Ipswich Borough Council site parcels.

5.0 Landscape and Visual Impact

- 5.1 Paragraph 135(c) of the NPPF **[NP2]** expects planning decisions to ensure that developments '*are sympathetic to local character and history, including the surrounding built environment and landscape setting*' (p.40).
- 5.2 A Landscape and Visual Impact Assessment (LVIA) **[L4]** was submitted as part of the application.
- 5.3 Due to the outline nature of the application, the LVIA is reasonably high level. Without detailed design information, it is difficult to provide a definitive assessment of effects. However, it is helpful in establishing the areas which are already reasonably well screened by existing vegetation, and can be further bolstered by additional planting, and the areas which are more open and sensitive to development: in particular, Parcel D (referred to as parcel B in the LVIA), which is located to the northern edge of the development. The LVIA identifies 3 viewpoints here: 12, 33 and 34.

- 5.4 Viewpoint 34 has been selected as a single break in the hedgerow along Tuddenham Road as you approach the site. In reality, there are additional patchy areas within the hedgerow as you drive south on Tuddenham Road and over the railway bridge, meaning that there are further opportunities for views to the site from here. Furthermore, the assessment only includes summer views, which is not an accurate representation of potential year-round visibility.
- 5.5 Viewpoint 12 is taken from the POV of a road user, and is therefore assigned medium sensitivity, but it is also the entrance to the PRoW, so will be used by walkers also. It is also taken at a specific point along the western boundary of Parcel D where there is a small collection of street clutter, including signposts and an electricity pole. If the road user travels just slightly to the north, they have more unimpeded views into the site.
- 5.6 Views of Parcel D from here currently contribute to the rural context to the town, by providing a backdrop of open arable farmland. Development at this site would significantly alter this visual experience, and whilst new planting may help to screen development, views over open plateau farmland would be lost. I would therefore suggest that the magnitude of change to views along the western boundary of Parcel D would be substantial, and therefore adverse effects would be increased, and would be difficult to mitigate over time within the development as currently proposed.
- 5.7 Viewpoint 33 looks back towards the site from the north, where it is partially visible within the tree lined horizon. Although some views into the site would be possible here, substantial tree planting along the northern boundary could mitigate this, but sufficient planting room would need to be provided, taking into consideration an

adequate set back from the railway embankment. This would require adequate space for the provision of a meaningful buffer along the northern edge of Parcel D.

- 5.8 Across the rest of the site, it is agreed that visual effects as a result of the proposed development can largely be mitigated over time to reduce residual harm with the inclusion of additional planting to bolster the site boundaries. However, this is dependent on adequate room being provided within the landscape buffer to the north and north-east for significant planting to be included. The Settlement Sensitivity Assessment [L1] identifies that this area is 'not widely visible from the surrounding landscape and lies close to the existing urban edge', making it less sensitive to residential development, but only 'where it is associated with new woodland planting'.
- 5.9 With regards to potential harm to local landscape character, further design development is required to be fully satisfied that this can be reduced to an acceptable degree.
- 5.10 Adequate reduction of harm will be dependent on the provision of a masterplan which achieves a generous, high-quality vegetated transition zone along the entirety of the north and north-eastern boundaries, a sensitive approach with regards to the historical character of the frontage along Humber Doucy Lane, and the appropriate treatment of Parcel D which relates more closely to the wider countryside. The Councils are not satisfied that current proposals would achieve this.

6.0 Reasons for Refusal: Transition from Town to countryside

Landscape buffer

- 6.1 One of the key characteristics of the development site is that it marks the existing edge of the town where it meets open countryside. At present, the built edge here is particularly hard in contrast to the surrounding countryside, and there is an opportunity to create a more successful transition from the urban townscape to the rural landscape beyond. This is highlighted in the Settlement Sensitivity Assessment [L1], which states that the existing landscape arrangement creates an *'abrupt contrast to urban edges along Humber Doucy Lane'* (p.18) and *'opportunities lie in the strengthening of landscape structure, softening of urban edge and reinforcement and creation of corridors which penetrate the urban areas'* (p.17).
- 6.2 This is recognised through Policy ISPA4 of the Ipswich Borough Local Plan [DP1] which requires *'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'* (p.43).
- 6.3 Policy SCLP12.24 of the Suffolk Coastal Local Plan [DP2] expects that a softening of the urban edge should be realised *'through the provision of significant landscaping'* (p.273).
- 6.4 Paragraph 12.217 of the supporting text to the policy elaborates on this requirement:
'The Settlement Sensitivity Assessment identifies opportunities in this area to soften the urban edge of Ipswich, and therefore development would be expected to provide significant landscaping and open space in the north eastern part of the site which would also act to retain separation and the rural character of the area around Tuddenham Lane to the north' (p.271).
- 6.5 Policy RSA2 of the Rushmere St Andrew Neighbourhood Plan [DP3] also advocates that *'proposals should make provision for a significant reinforcement of existing planting and additional native tree planting*

of local provenance along the north-eastern / eastern boundary of the site' (p.15).

- 6.6 It is clear, then, that a sizeable buffer is required along the north and north-eastern edges of the development. This buffer should serve to bolster existing planting, introduce areas of new planting, provide adequate space to achieve a successful transition zone and retain a sense of separation between the town and surrounding settlement, and soften, break up and penetrate the built environment, so as not to re-establish a hard urban edge.
- 6.7 The Design and Access Statement (DAS) **[AD16]** makes only limited reference to the creation of a buffer in order to soften the built edge and ensure a successful urban-rural transitional zone along the northern and north-eastern boundaries; rather, it focuses on this area with regards to the provision of the Green Trail.
- 6.8 In reality, this edge needs to perform multiple functions, including the provision of SANG, SuDS and play. Whilst section 7.2 of the DAS **[AD16]** does provide some further context to the design intention for this space, it does not go far enough in setting out how all these uses will be successfully incorporated. The illustrative views to the Green Trail buffer zones included on page 111 show wide open green spaces which do not reflect the proposed landscaped edge condition.
- 6.9 The Green Trail buffer zone proposed by the appellant comprises a linear strip around the site boundaries. Although there are some slightly more generous areas, overall, the new built edge is pushed up reasonably close to the boundary with the wider countryside; this is especially evident along the top of parcels B1, B2, D, E1 and E2 as set out on the applicant's Green and Blue Infrastructure Parameter Plan **[AD2(3)]**. Figure 1. below uses red circles to highlight the locations which are considered by the Councils to be particularly constrained.



Figure 1. Green and Blue Infrastructure Parameter Plan with constrained buffer areas marked on

6.10 The strip to the north of Parcel D measures around 15m in width, and that to the north of Parcels E1 and E2 measures around 13.5m. Considering that a meaningful woodland planting strip to bolster existing boundary vegetation would likely measure between 10-15m in width, and there are numerous other walking/cycling uses to be proposed in these areas as part of the Green Trail, as well as the required SuDS infrastructure, it is concluded that they are too constrained. It must also be considered that Parcel D runs adjacent to the railway line, and any planting proposed at the top of the embankment would likely need to be pushed further south into the development to avoid leaf/branch fall onto the line.

- 6.11 Areas to the north of B1 and B2 measure around 18-23.5m at their tightest points. In order to accommodate the multiple proposed uses, including 8m width swales as indicated on the Proposed Surface Water Drainage Strategy drawing **[APD1]**, as well as the significant planting and accessible walking and cycling routes required by the Councils' policies, more space is needed here also. As noted above, the inclusion of a woodland planting strip of around 10m, plus the required 8m width swales, would leave little to no room left over for other requirements, such as a 3m width dual use footpath/cycleway and planting to screen the built edge in order to achieve a sense of nature emersion.
- 6.12 The Councils are not satisfied that the current buffer layout provides adequate room to accommodate meaningful areas of Natural and Semi-Natural Green Space where users can feel fully emersed in nature, as this would require significant planting along the built edge to provide adequate separation, and sufficient space has not been provided for this.
- 6.13 The Healthy Environments SPD **[SPD6]** suggests that in order to create Natural and Semi-Natural Green Spaces, these areas should be positioned away from higher activity areas, streets and roads and should use '*dense, varied and layered plantings (throughout and around the edges, e.g. tree and shrub belts)*' (p.45) to provide adequate separation. The space provided simply does not allow for this objective to be achieved.
- 6.14 SuDS features comprise a significant proportion of the buffer area but there is not enough information to be satisfied that their design will allow for successful integration into the landscape, as required by Policy SCLP9.6 of the Suffolk Coastal Local Plan **[DP2]**, which states that SuDS should be '*integrated into the landscaping scheme and*

green infrastructure provision of the development’ and should ‘contribute to the design quality of the scheme’ (p.161).

- 6.15 At present, the proposed basins are of a highly engineered appearance with 1 in 4 gradients to the sides, as shown on the Proposed Surface Water Drainage Strategy drawing **[APD1]**. This would not result in a particularly natural looking space, and it is questionable as to whether they would create the right character to be included in Natural and Semi-Natural Green Space/SANG provision. The side gradients are also not considered particularly accessible to a wide range of users - it would be preferable for basins with variable side gradients to be designed to ensure shallower slopes to accommodate access points – and it is not agreed that they should be included within the overall open space provision until we have further reassurance of their appropriate design.
- 6.16 Although the applicant has submitted a Proposed Surface Water Drainage Strategy drawing **[APD1]** indicating the location, size, depth and gradient of the basins, the Councils have not been provided with any sections through these basins or any more detailed information regarding their functionality or proposed design intentions. The Illustrative Landscape Strategy **[AD17]** does suggest that the basins will include native wildflower grassland and marginal planting, but does not provide any suggestion that their intended use is for multi-functional purposes.
- 6.17 The Healthy Environments SPD **[SPD6]** suggests that for SuDS to count towards amenity green space provision they should not have steep sides, they should not have significant level drops, and they should not be designed so that they are likely to retain deep water. If SuDS features have to be fenced off, this *‘will cause them to be excluded*

from being counted towards the meeting of the site's green open space requirements' (p.79).

6.18 If basins are designed to provide shallower, more accessible spaces, there is potential for their land take to increase, which could have a knock-on effect for the delivery of other open space requirements, so it is vital that this is properly considered at outline stage.

6.19 Image 1. below shows an example of a SuDS basin which has been well incorporated into wider open space provision. It is not visually obvious that the space acts as a basin and there are both steeper and shallower gradients proposed around the edge to ensure appropriate points of access. The space is large enough that it could feasibly be used for casual play, but also provides some opportunity for planting to soften and better integrate the space.



Image 1. Multi-functional SuDS basin example taken from the CIRIA SuDS Manual

6.20 Image 2. below shows an example of a swale which has been designed with both a shallower accessible edge as well as a steeper edge. This kind of nuanced approach allows for truly multi-functional SuDS rather than spaces which feel that they are visually and physically separated from the wider open space provision.



Image 2. Swale example taken from the CIRIA SuDS Manual

6.21 Guidance from the CIRIA SuDS Manual **[OT26]** suggests that *‘the form and aesthetic appearance of the facility will depend on specific site characteristics, local public concerns, and development design criteria’* (p.263). In order to achieve successful integration and multi-functionality, *‘interdisciplinary working, particularly between landscape architects and drainage engineers’* (p.70) will be required. The Councils have not been provided any evidence that this is the case at the site; the basins appear to have been designed in silo by the drainage engineers and have therefore not properly responded to site characteristics and design intentions have not been determined. This is evidenced by limited reference to SuDS landscape design in the DAS and changes to the drainage strategy without the input of a landscape expert.

6.22 Where side slopes of 1 in 4 are referred to, these are as maximum gradients, and usually with reference to the use of mowers for maintenance rather than recreational access. Policy DM12 of the Ipswich Local Plan **[DP1]** requires that development *‘include useable public spaces for all (including pedestrians, cyclists and people with*

disabilities) that are easily understood and easy to pass through' (p.145); SuDS features should not form barriers to easy access through open space.

6.23 For SuDS features to provide visual amenity, planting should also be carefully considered. Naturalistic design is particularly important when considering the acceptability of SuDS features as SANG provision. Refer to Section 7 of James Meyer's proof of evidence for further detail on this point.

6.24 In order to achieve an effective buffer which incorporates all requirements, it is suggested the following design principles should be followed:

- a) Soft residential edge including front gardens and pedestrian access (roads and parking should be restricted to the rear of properties) to reduce potential visual and aural influences;
- b) Amenity corridor along the residential edge including uses such as formal combined pedestrian/cycle path, play areas, and multi-functional SuDS features;
- c) SANG buffer to provide adequate planting to limit visual and aural influences;
- d) Generous area of Natural and Semi-Natural Green Space to allow for significant planting/habitat creation to achieve a sense of nature immersion (can contribute to SANG provision);
- e) Meaningful green corridors of varying width which penetrate the urban area and help to break up the edge condition (strategically located corridors could help to retain vegetated views through the site from Humber Doucy lane);
- f) Provision of appropriate landscaping around heritage assets to respect their historic farmstead setting (e.g. open grassland); and
- g) Native woodland buffer along boundary to bolster screening.

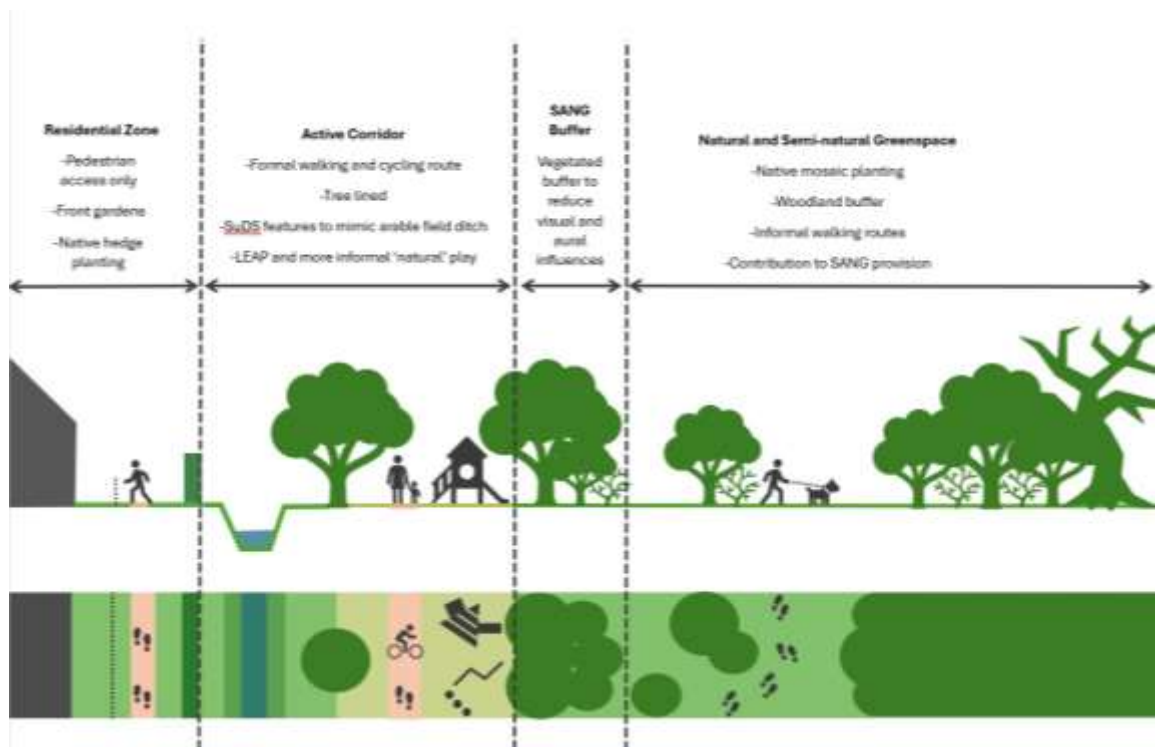


Figure 2. Indicative buffer section and plan

6.25 Figure 2. above shows an indicative landscape buffer treatment which would incorporate multiple active uses whilst also incorporating SANG space and achieving a successful transition from the urban edge to the countryside. Whilst the current proposals do include a number of these elements, ultimately the design falls down where the buffer is squeezed in size, and I am not satisfied that we have sufficient information to conclude that everything could be successfully accommodated in these areas.

6.26 Landscape section A-AA provided by the appellant on the Illustrative Landscape Strategy drawing **[AD17]** is located at a more generous point in the buffer and therefore does not adequately reflect the majority of this space.

6.27 Landscape section B-BB on the same Illustrative Landscape Strategy drawing [AD17] is a more realistic illustration of how a lot of the buffer spaces would function, and this clearly provides limited room for meaningful multi-functional green infrastructure. This is shown below at Figure 3., which highlights a lack of plating to soften and screen the built edge and provide a proper SANG buffer.

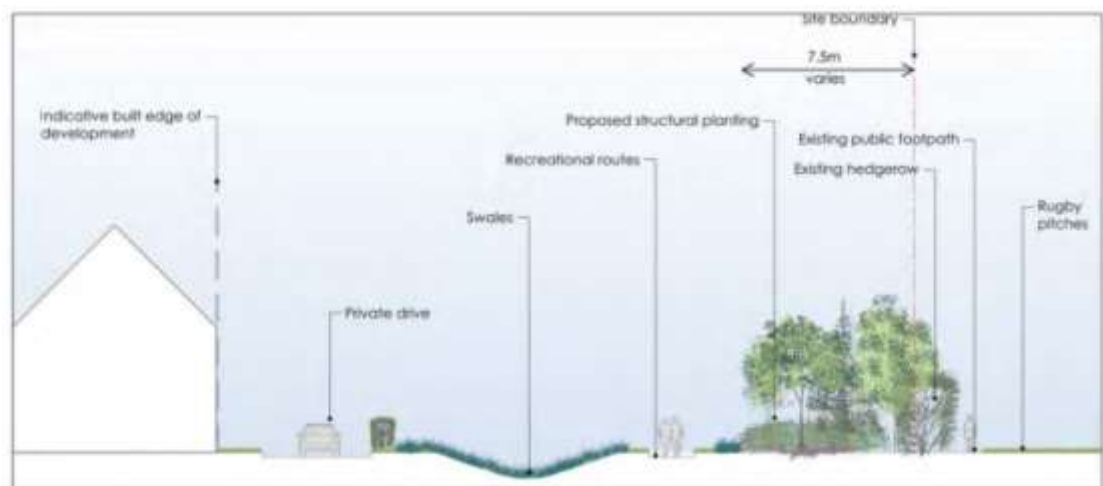


Figure 3. Section B-BB from Illustrative Landscape Strategy drawing

6.28 This scheme should be landscape led, with the resulting housing parcels being informed by the layout of the proposed buffer and open spaces which penetrate the built form. Conversely, it appears that landscape has been fitted in around the edges of the housing, which has resulted in a poorly designed site with a squeezed buffer layout.

6.29 The approach to development also does not appear to be site specific; this location requires a nuanced approach based on the sensitivity of this town edge location. This is highlighted in the North East Character Area Ipswich Urban Characterisation Study [SPD10] which states that *'any new development along the rural edge requires very careful and sensitive consideration'* (p.15).

- 6.30 Parcel D to the north of the site contributes to the rural character of Tuddenham Road and is more typical of the exposed agricultural plateau which characterises the landscape experience in this area, as described by the Suffolk Coastal Landscape Character Assessment [L2]. The Settlement Sensitivity Assessment [L1] suggests that elevated land such as this *'feels part of the wider rural landscape rather than part of Ipswich'* (p.18).
- 6.31 This parcel of land is particularly important to the transition of the site from the urban form along Humber Doucy Lane to the open agricultural land and river valley to the north. It is physically and visually separated from the rest of the site by a hedge and tree lined rural access road which leads to Allen's House and Lacey's Farmhouse, and as such, possesses a more isolated character than the remaining land to the south-east.
- 6.32 The proposed treatment here is not nuanced, rather it follows the same pattern as the other site parcels, leaving uncertainty over whether this would provide adequate space for development of a meaningful buffer, in particular along the northern boundary.
- 6.33 It is questioned why this parcel has not been considered for SANG provision; this would ensure the rural character of Tuddenham Road is retained and would provide a significant buffer to the wider site where it meets open countryside.
- 6.34 Section 7 of this proof of evidence provides further analysis of the sensitivity of Parcel D and reasoning for its potential alternative treatment.

- 6.35 Whilst it is agreed that development along Humber Doucy Lane should not be set so far back as to compromise the creation of a successful street scene here, this is a sensitive urban edge and should be designed with care.
- 6.36 Existing development along the southern edge of Humber Doucy Lane comprises locally listed buildings which are particularly diminutive in stature and therefore vulnerable to being dwarfed by new dwellings. Additionally, as highlighted in the Ipswich Local Plan Heritage Impact Assessment **[H5]**, the historic character of Humber Doucy Lane is one of a tree lined street, with the name thought to derive from the French words 'ombre douce' meaning 'sweet shade' (p.11). Therefore, adequate space should be provided along the front of the development to introduce significant new avenue tree planting to strengthen the prevailing character. Paragraph 136 of the NPPF **[NP2]** also highlights the importance of incorporating appropriate street tree planting into new development.
- 6.37 Introducing substantial new tree planting will also provide succession for the existing remnant oaks along the southern edge, which do not have adequate space alongside the well-used road, and of which many are in decline. A significant landscape strip is required to incorporate tree species with a large mature size so that they are provided sufficient rooting space and to ensure that their future retention alongside the road is viable.
- 6.38 Whilst a verge along the frontage does appear to have been provided, this is bounded by a hard surfaced pedestrian/cycle route, SuDS features and residential development to the north, which would introduce conflict with roots.
- 6.39 As part of the initial opportunity mapping undertaken by the applicant, page 53 of the DAS **[AD16]** refers to the creation of 'a

meaningful buffer zone that responds to the Humber Doucy Lane environment', but this has not been carried through in the design development. The Landscape Strategy on page 96 makes no reference to this area, or the objective identified in the DAS.

- 6.40 The proposed landscaped area along Humber Doucy Lane to the south of Parcel A1 measures approximately 10m in width. This would need to accommodate a shared pedestrian and cycle path; as per the Suffolk Design Streets Guide [DG1], shared use paths must be at least 3m wide. Additionally, the existing hedge would need to be removed, and a new hedge set back further into the site outside of visibility splays, squeezing the remaining space further still.
- 6.41 Industry guidance suggests that a large/massive stature tree species such as oak would require around 30-35m³ of soil to ensure its future survival; if a max. depth of 1m is assumed, this would mean that a planting pit/soft landscaped area of min. 5m x 6m would be required per tree. Trees should also be adequately set back from the road so that they are provided with sufficient space for canopy growth without continual requirement for pruning.
- 6.42 It is therefore evident that a reasonably generous area of landscaping is required along Humber Doucy Lane to accommodate the set back hedge planting, substantial new avenue tree planting and other infrastructure such as SuDS and footpaths/cycleways. Although the applicant identified this as an opportunity early on in the design process, this has not been carried through, and the proposed layout has not delivered on these design intentions.

7.0 Open Space Quality

Open Space Requirements

- 7.1 Open space requirements for new development sites are set out in Ipswich Borough Council's Public Open Space SPD **[SPD7]** and East Suffolk Council's Healthy Environments SPD **[SPD6]**.
- 7.2 Taking into account the information within the SPDs, the Councils believe that the following open space typologies should be included in the overall provision at the site:
- Parks and Gardens
 - Amenity Green Space
 - Natural and Semi-Natural Green Space
 - Outdoor Sports Facilities
 - Provision for Children
 - Provision for Young People
 - Allotments
- 7.3 Alongside this, Policy ISPA4 includes a requirement for the provision of SANG at the site.
- 7.4 Deficiencies in the quantum of open space proposed by the applicant are covered in Section 6 of Lisa Evan's proof of evidence. In parallel, this proof of evidence will discuss the quality of the open space provision and how this affects the ability of the applicant to deliver the Council's requirements.

Natural and Semi-Natural Green Space

- 7.5 Natural and Semi-Natural Green Space have the following definitions as set out on page 45 of the Healthy Environments SPD:

'Natural' green space is publicly accessible green open space where human control and activities are minimal, so that a feeling of

naturalness is allowed to predominate. This supports high quality 'nature immersion' experiences for users of these spaces. Natural green space is native and so are largely left 'wild' to self-manage, with the help of minimal conservation activity as and when needed. In the context of open space provision, examples of natural green space include publicly accessible woodland, scrub, grassland, heathland and wetlands.

'Semi-natural' green space is publicly accessible green open space as described above but that has been evidently altered by humans to make it more accessible. This may include spaces where accessible natural-surfacing (or bound, more accessible) footpaths have been created, the addition of basic facilities like litter/dog waste bins, benches, and way finding signage, and/or clearance has occurred to create open areas (e.g. picnic areas).'

- 7.6 The appellant has provided contradictory information regarding the delivery of Natural and Semi-Natural Green Space at the site.
- 7.7 The Open Space Assessment **[AD15]** submitted as part of the application concludes that Children's Play, Youth Provision, and Parks and Gardens are the primary open space typologies to be included at the site. Regarding the provision of Natural and Semi-Natural Green Space, the assessment suggests that *'although there is a numerical shortfall within the relevant Ipswich area, the site is actually well located to accessible natural open space within the neighbouring East Suffolk area'* (p.5), leading to an exclusion of this typology from the suggested priorities.
- 7.8 However, the closest identified area of Natural and Semi-Natural Green Space is located approximately 1.38km from the site – an unrealistic distance for residents to walk – and Playford Alder Carr,

which is located at least 1.6km from the site, is one of the four lowest scoring sites for quality across the East Suffolk Council district.

7.9 A need for the provision of Natural and Semi-Natural Green Space is also noted in relation to the Green Trail, which is referenced in Policy DM10 of the Ipswich Borough Council Local Plan **[DP1]**.

7.10 In addition to this, Policy ISPA4 requires the provision of SANG at the site, which would rely on the inclusion of areas of Natural and Semi-Natural Green Space to provide spaces of a natural quality sufficient to result in a sense of nature immersion.

7.11 It is therefore clear that Natural and Semi-Natural Green Space would need to be included within the open space typologies delivered at the site.

7.12 Contrary to the position of the Open Space Assessment **[AD15]** on the provision of Natural and Semi-Natural Green Space, a breakdown of open space typologies in section 7.1 of the DAS **[AD16]** suggests that 9.56ha of Natural and Semi-Natural Green Space is included within the overall open space provision at the site.

7.13 However, the areas proposed as Natural and Semi-Natural Green Space appear to include all open space outside of the Parks & Gardens, Amenity Green Space and Play Provision typologies; it is unlikely that many of these identified areas would meet the conditions necessary to be considered Natural and Semi-Natural Green Space.

7.14 The Healthy Environments SPD **[SPD6]** describes Natural and Semi-Natural Green Space as areas which *‘tend to be large in size, consist of native plantings and habitat, and are able to provide high quality*

'nature immersion' experiences through the minimisation of 'urban' sensory experiences such as the sound and sight of vehicles' (p. 45). The suggestion that areas of proposed open space located along Humber Doucy Lane and directly adjacent to urban roads and residential edges can achieve these conditions as they are currently set out is not agreed by the Council.



Figure 4. Extract from Green and Blue Infrastructure Parameter Plan with constrained linear parcels marked on

- 7.15 The red circles on Figure 4. above indicate the linear parcels between residential land and road infrastructure where space for the creation of Natural and Semi-Natural Green Space conditions is particularly limited. These linear parcels predominantly measure between 10-15m in width, and many include 8m width swales which are unlikely to be able to accommodate meaningfully planting due to potential management conflicts.

- 7.16 It is clear then that the scheme does not result in the over provision of Natural and Semi-Natural Green Space as stated in the DAS **[AD16]**, rather, there is uncertainty over whether much of the current provision would achieve the relevant open space typology conditions. Whilst this may not affect the ability of the applicant to achieve the required quantum of Natural and Semi-Natural Green Space, it has important implications for the adequate provision of SANG at the site.

Suitable Alternative Natural Green Space

- 7.17 As stated above, issues in delivering the stated quantum of Natural and Semi-Natural Green Space has implications for SANG provision. The Healthy Environments SPD defines SANG as *‘a form of large scale, exceptionally high quality natural/semi-natural green open space that is provided with the primary purpose of deterring people away from use of European sites for day to day recreation activity purposes’* (p.59).
- 7.18 Therefore, the delivery of SANG at the site is reliant on the successful delivery of Natural and Semi-Natural Green Space.
- 7.19 The development proposes up to 660 dwellings which would generate a SANG quantum requirement of 12.67ha (at 2.4 residents per dwelling using the calculation of 8ha of SANG per 1,000 people). However, as set out in section 7 of James Meyer’s proof of evidence, the development proposal’s quantum of 11.5ha was considered acceptable for the purposes of the Habitats Regulations Assessment (HRA), taking account of additional recreational disturbance mitigation measures proposed by the scheme.
- 7.20 Incorrectly though, the Habitats Regulations Assessment **[AD30]** submitted by the appellant assumes that all open space typologies at

the site, including Parks and Gardens and Amenity Green Space, will contribute to the overall 11.5ha SANG provision.

7.21 As per the SANG definition set out on page 59 of the Healthy Environments SPD **[SPD6]**, it is considered that Natural and Semi-Natural Green Space should be the main typology contributing to SANG; the application includes a proposed quantum of 9.56ha.

7.22 However, as already touched on, the achievement of 9.56ha of Natural and Semi-Natural Green Space is disputed by the Councils. Therefore, SANG provision at the site would be even lower.

7.23 The Healthy Environments SPD **[SPD6]** states that SANG should be *‘designed to support ‘nature immersion’ experiences through natural environments and sensory separation from wider urban environment’* (p.65). In order to achieve this, SANG needs to be buffered from built-up areas with substantial landscaping. It is clear that many of the current proposed linear parcels would not achieve this; significantly more space for planting is required along the built edge in order to reduce visual and aural influences from adjacent residential parcels and road infrastructure

7.24 Refer to Section 7 in James Meyer’s proof of evidence for further information regarding SANG provision.

Play Space

7.25 The proposed distribution of play space across the site is considered sub-optimal. With the exception of the LEAP located within the ‘village green’, play provision is pushed to the edges of the development. The Healthy Environments SPD **[SPD6]** states that play provision *‘should not be located in a ‘tucked away’ location out of*

sight from the existing community – it should be visible and open for all to use that are within walking distance of the provision’ (p.87).

7.26 The Play and Recreation Strategy included on page 119 of the DAS [AD16] highlights that the location of the LEAPS to the far south-eastern corner of the site and the north-western corner of the site mean that several areas within the development would be outside the 5 minute walk radius, as required by the Healthy Environments SPD [SPD6] (Table 19, p.93).

7.27 Figure 5. below includes blue circles around the LEAPS which have been pushed to the edges and red circles which highlight the issues this causes with accessibility for all residents at the site, as there are areas to the west of Parcel D and Parcel E1 are outside the 5 minutes walk radius.

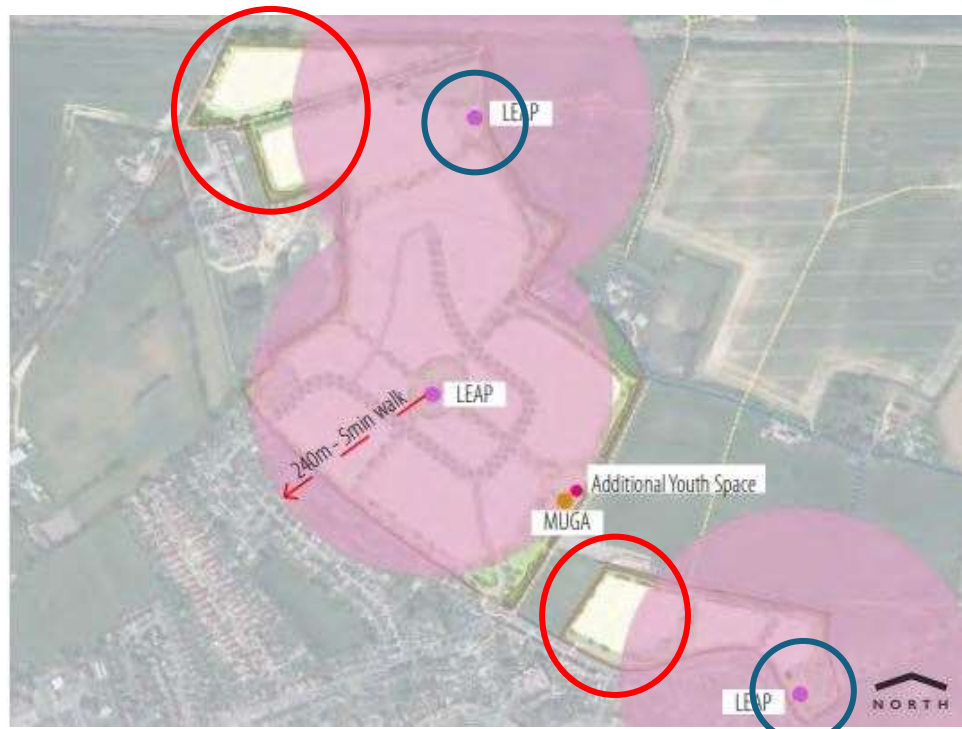


Figure 5. Excerpt from the Play and Recreation Strategy drawing from page 119 of the DAS with undesirable LEAP locations highlighted

- 7.28 If the LEAPs were pushed further west into Parcels C and E2, the entire site would be within the access requirement. This could be achieved through the provision of more generous and meaningful green fingers of open space penetrating into the built areas. This improved distribution would also help with overlooking and visibility.

8.0 Conclusions

- 8.1 The inability of the proposed layout to achieve suitable open space typologies and the inadequacy of the current proposed transition from urban edge to rural landscape, means that the application is contrary to Policy SCLP10.4, Policy SCLP12.24, Policy ISPA4 and Policy RSA2. Lack of information regarding the design intentions for the numerous SuDS basins across the site, means that the Councils are also not satisfied that the application is in line with Policy SCLP9.6.
- 8.2 The proposed layout does not provide sufficient space along the entirety of the north and north-eastern site boundaries to ensure the successful introduction of generous areas of multi-functional green infrastructure, including significant planting to soften the built-edge and provide a buffer to protect the countryside beyond, alongside other uses such as SuDS and play.
- 8.3 The restricted nature of some parts of the proposed landscape buffer means that there is limited room to achieve the required conditions for Natural and Semi-Natural Green Space. This is also the case along the linear parcels within the site and along the Humber Doucy Lane frontage. Therefore, the proposed quantum of 9.56ha is contested, which has consequences for overall SANG provision, which does not currently meet policy requirements.
- 8.4 The Councils were not satisfied at the time of refusal that the appellant had provided adequate information to conclude that

required open space typologies could be achieved and that a successful transitional buffer could be delivered.

- 8.5 Although design codes could be conditioned to set out the key principles for achieving a high-quality development, there is a need to demonstrate that this can feasibly be delivered at outline stage, and it is the applicant's duty to demonstrate this to the Councils.

