

REBUTTAL PROOF OF EVIDENCE OF CLIVE SELF

Dip LA CMLI MA (Urban Design)

LANDSCAPE AND VISUAL MATTERS

In respect of:

APPLICATION REFERENCE: IP/24/00172/OUTFL

PINS REFERENCE: APP/R3515/W/24/3350674

SITE ADDRESS AND DESCRIPTION OF DEVELOPMENT:

Land at Humber Doucy Lane, Ipswich, Suffolk

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 of up to 660 dwellings

INTRODUCTION

1. My name is Clive Self. Full details of my qualifications and experience are contained in my main proof of evidence.
2. This Rebuttal Proof of Evidence has been prepared in response to the evidence of Ruth Chittock, Senior Landscape Officer at East Suffolk Council. Her evidence is submitted on behalf of Ipswich Borough Council and East Suffolk Council. The rebuttal also considers the 'Potential Alternative Scheme' that was prepared by Philip Russell Vick of Enplan on behalf of both authorities.
3. This Rebuttal only considers Landscape Matters.
4. This is not intended to be an exhaustive rebuttal and this document only deals with certain points where it is considered appropriate or helpful to respond in writing at this stage. Where a specific point has not been dealt with, this does not mean that these points are accepted and these other points may be addressed further at the Inquiry.
5. As landscape judgements are largely subjective, I have not responded to differences between the two parties as these matters will ultimately be one where the Inspector reaches her own conclusions.
6. The function of the semi natural and natural areas of open space as part of a SANG is addressed in the rebuttal of Dr Marsh. The quantum and provision of

open space and the need for allotments etc. is addressed in the rebuttal of Mr Coleman.

7. In the following section of this rebuttal I address the main landscape matters raised in the evidence of Ms Chittock.

Design Quality

8. Paragraph 8.5 of Ms Chittock's evidence states that *'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.*
9. The planning application is primarily in outline form, saves for means of access. The applicant has nevertheless provided illustrative material to show the intended landscape approach to the development. An Illustrative Landscape Strategy Plan was submitted with the application to show the potential treatment of the areas of open space, indicative plant species, rustic nature of the play equipment etc. Illustrative sections were also provided.

Fully Emerged in Nature

10. Paragraph 6.12 goes on to say that *'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 emerged** in Nature [my emphasis].*
11. The approach to the treatment of the boundaries of the Appeal Site with the neighbouring countryside has been to create a natural and semi natural green space. If the depth of the buffer provided is that shown by the Appellant, or that shown on the Potential Alternative Scheme, prepared by Enplan, one would not be fully emerged in nature as one would be on the edge of a major development. Nevertheless, the buffer would have a semi natural feeling and would deliver benefits for both wildlife and people.
12. Figure 1 on the following page is from a major development in Andover where we created a natural/semi natural green space on the periphery of the development which accommodates a variety of uses. The intention would be to create a similar environment on the countryside edge of the Appeal Site.

SuDS Basins are Highly Engineered

13. Once again, the exact design and landscape treatment of the drainage basins will be determined at the reserved matters stage. Paragraph 6.15 of Ms Chittock's evidence says that *'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.



Figure 1 Semi natural multi-functional green space at Andover

14. Two images are also included in Ms Chittock's Evidence which show swales and drainage basins which have an engineered appearance. I don't quite understand why these are included as the images on the submitted Illustrative Landscape Strategy (see Figure 2) show drainage features which have a more informal, semi natural appearance.
15. Once again this is one to be dealt with at the reserved matters stage but when undertaking the detailed design of drainage basins and swales we always work closely with our inhouse team of ecologists and the external drainage engineers to ensure that the drainage features respond to the local environment in an appropriate manner.

Multi-Functional Use of the Drainage features

16. Paragraph 6.16 of Ms Chittock's Evidence says that '*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 multifunctional purposes*'.
17. Some drainage basins have multi-functional uses. For example, I have seen people sitting on the banks of drainage basins having picnics with their children

paddling in the water. Other drainage basins and swales focus on their wildlife value and have limited or no public access.

18. The approach to the treatment of drainage features on the Appeal Site has been to create a natural/semi nature environment as opposed to a more formal arrangement. The fact that they may have limited accessibility in some instances does not diminish their value as they are an important landscape feature and have wildlife value.



Figure 2 Image from the Illustrative Landscape Strategy showing the informal nature of a swale.

Approach to the development does not appear to be site specific.

19. Paragraph 6.29 says that *'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'*.
20. This is clearly not the case and it is also worth noting that in setting out the need for a greater depth of buffer planting Ms Chittock does not describe the nature of the external site boundaries and the extent of planting which already exists on them.
21. As set out in my main proof of evidence, the northern boundary of the Appeal is already clearly defined and has established planting on it. Where there are occasional gaps in the planting there will be opportunities within the site to undertake additional planting.

Play Areas are not Accessible

22. At paragraph 7.26 Ms Chittock refers to page 119 of the DAS and provides an annotation of Figure 5 where she highlights, in red, two areas which she says are outside of the 5 minute walking radius for LEAPs.
23. Unfortunately, this is a misinterpretation of Figure 5. The 240 m linear isochrone on Figure 5 is derived from the Fields in Trust Guidance of 2008, which I was one of the authors of. In the 2008 document, the walking distance to a LEAP is 400 metres with the 'Straight Line Distance' as 240 metres. The reason for providing a shorter 'Straight Line Distance' was to give an indication of what a typical walking distance to play area would be within a development, as at the outline planning stage, there would be no definitive plan to enable the exact distance to be calculated. The latest iteration of the Fields in Trust Guidance no longer contains 'Straight Line Distances'.
24. The 240 metre isochrone that was presented in the DAS was a more realistic approach than simply using 400 m isochrones to demonstrate a 5 minute walk to the nearest play area, as in reality, if you live on the outer limits of a 400 m Isochrone, the chances that you can walk in a straight line for the full 400 m are very slim. For completeness, in Appendix A of my main proof of evidence I have also included linear isochrones which show the distances from the various play areas.
25. Figure 3 is an extract from the Illustrative Landscape Strategy which has been annotated to show the most distant properties from the LEAP in the northern part of the site. This shows that at the most northern tip of the site the maximum walking distance to the LEAP would be approximately 435 metres. Although, in reality, the distance is likely to be shorter as there would be an internal road serving the properties but given that the layout is not fixed at this stage one cannot measure the actual distance.

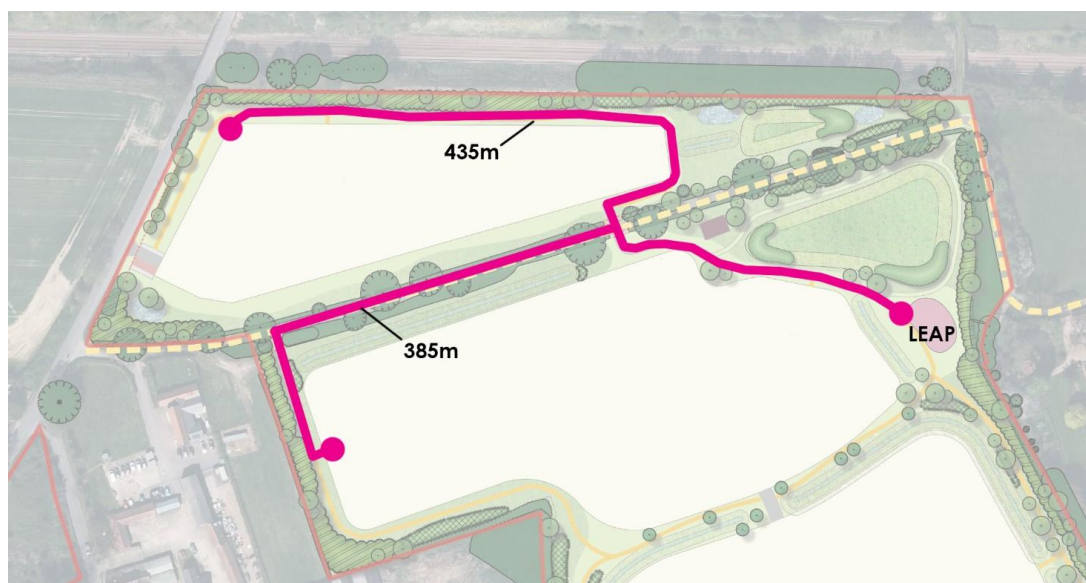


Figure 3 Indicative walking route to LEAP

26. At the outline planning stage it is not possible to provide a definitive walking distance from each property to each play area but on any reasonable basis the vast majority of properties within the Appeal Site would be within the required walking distances, or in the worst case, only marginally over. If this remained a concern of the Local Authorities then the play areas could be moved to address this concern.

Humber Doucy is a Sensitive Urban Edge

27. Paragraph 6.35 states that *'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'*.
28. Once again this is one for the reserved matters stage and it is acknowledged in paragraph 8.5 of Ms Chittock's Evidence that *'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'*.
29. The intended approach to the design of the Appeal Scheme is set out in the DAS and as far as I'm aware no additional information on design matters was requested at the pre app stage.

Potential Alternative Land Use Plan

30. The Proof of Evidence of Lisa Evans also includes a Potential Alternative Scheme for the Appeal Site and the allocated land to the west of Humber Doucy Lane.
31. The Alternative Scheme was prepared by Philip Russel Vick of Enplan and it is highly unusual to have a Local Authority adopt such an approach at the appeal stage. I therefore only make some brief observations.
32. In broad terms, the Alternative Scheme follows the same approach to the structure of the development as that shown on the parameters plans, in that:
- (i) At the heart of the development is a formal green and play area;
 - (ii) The existing rugby pitch in the southeastern part of the site is occupied by residential development;
 - (iii) The drainage features, community orchard and play areas are in a similar location to those on the illustrative masterplan;
 - (iv) The proposed development has a similar relationship to Humber Doucy Lane;
 - (v) The proposed mixed use development remains in the same location; and

(vi) The street trees follow a similar alignment.

33. The main difference is that the parcel at the northern end of the site is retained as open land; the buffer along the northeastern boundary and part way along the eastern boundary with the rugby pitch is increased in depth; and there is a marginal increase in the depth of the northern buffer in the eastern part of the site.
34. The plan also shows development on the parcel to the west of Humber Doucy Lane which forms part of the allocation. I appreciate the plan is only indicative but there are a series of tall poplar trees on the southwestern boundary of that parcel which would probably result in a reduction in development in that part of the Site.
35. I have already addressed in my evidence, why the buffers shown on the submitted plans are appropriate, and as such I shall not repeat it here. I would add that I consider it unnecessary to create a wider buffer alongside the rugby pitch as those pitches are detached from the wider countryside.

Conclusion

36. Many of the matters raised in Ms Chittock's Evidence are capable of being addressed at the reserved matters stage other than the depth of the landscape buffers where we hold different views.
37. The Potential Alternative Scheme, prepared on behalf of the Councils', endorses the appellants approach to the configuration of the development, the location of facilities and points of access. The main difference between the parties is the extent of the landscape buffers.