



Planning Services
Mid Suffolk District Council
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12/10/2023

For the attention of: Daniel Cameron

Ref: DC/23/03703; Land To The North And West Of, School Road, Elmswell, Suffolk

Thank you for consulting us on the Pre-Application Enquiry of the Erection of 66 Bed Care Home and 40 Assisted Living Dwellings; landscaping; sustainable drainage and access. An initial pre-application meeting was held 13th September 2023 on site. This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

Site context

The site lies directly to the west of the village of Elmswell, which is situated towards the east of the Mid Suffolk Local Authority Area. The site is comprised a roughly rectangular piece of agricultural land, approximately 12ha. The site has complex slopes, generally being higher to the eastern edge sloping down towards the west.

The northern boundary of the site is enclosed by elevated railway tracks (Greater Anglia, Bury St Edmunds to Ipswich line), beyond which lays open agricultural land and associated farm buildings including Grade II listed Elmswell Hall. To the northern portion of the east of boundary is Parnell Lane, a horse chestnut lined avenue leading to Elmswell Hall, beyond which is newly developed residential housing. The southern portion of the eastern boundary is open onto School Road. There is one notable Oak on the west of the highway which is subject to a Tree Preservation Order (TPO). There are also several large trees to the east of School Road which contribute to the street scape, along with the vegetated boundaries of existing properties along this edge. To the south of the site lay Grade II listed The Almshouses, and Grade II* St John's Church. The western boundary is visually open, contained by a water course/field drainage ditch (possible tributary of River Black Bourn).

The site is currently in agricultural use for arable crops and is identified as having an agricultural land classification of Grade 2.

PRoW Footpath 14 crosses the north edge of the site while Footpaths 24 and 13 lay to the north-east of the site boundary and have close proximity views into the site.

The site is generally open, its undulating topography allows clear views into and through the site. The wider countryside to the west is visible from School Road. The railway track which passes to the north is elevated above the site level however the embankment vegetation is low at this point thereby retaining views to the open countryside to the north, views of the Elmswell Hall farm complex are also possible. The openness of the site also allows appreciation of St John's Church which sit in an elevated position to the south. While there is residential settlement to the east, the edge this is contained by School Rd and the new 'green' space within the recent development.

The landscape is identified as laying within the Ancient Plateau Claylands character area of the Suffolk Landscape Character Assessment. The key characteristics which are considered relevant to this site are gently rolling arable landscape of clay soils, pairing of medieval church and manorial halls in valley side locations close to water supplies (note that the OS Six Inch, 1888-1919 map indicates a spring is located on site close to School Road) and frequently open views with some woodland present in views.

The site does not sit within a designated landscape or special landscape area, though this does not exclude the intrinsic beauty and value of the landscape in which it sits which contributes to the setting of the village and is agreed to contribute to the setting of St John's Church and several other listed buildings within the wider landscape.

The proposal

The proposal subject of this pre-application is for erection of 60 Bed care home and 40 assisted living dwellings on the north of the site while the south of the site is proposed as open space with the singular vehicle access point and new pedestrian and cycle routes close to the church end.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities & Local Government (MHCLG) and last updated in September 2023. The NPPF includes for the conservation and enhancement of the natural environment by protecting and enhancing "valued landscapes" and sites of biodiversity or geological value / soils. Recognise the intrinsic character and beauty of the countryside, and the wider benefits of natural capital and other ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland. The overarching objective to protect and enhance our natural, built, and historic environment is reflected in specific policies about: achieving well-designed places (Section 12); conserving and enhancing the natural environment (Section 15); and conserving and enhancing the historic environment (Section 16).

Mid Suffolk Local Plan (1998) - Current adopted

Policy CS1: Settlement Hierarchy of the Core Strategy DPD (2008) identifies that the site itself falls outside of the settlement boundaries of the Key Service Centre of Elmswell, as defined in the adopted Mid Suffolk Local Plan (MSLP) (1998). Therefore, it is subject to Policy CS2: Development in the Countryside and Countryside villages which restricts development to defined categories, including recreation and tourism.

Policy CL11: Retaining high quality agricultural land of the MSLP seeks to "*encourage the conservation of agricultural land*". It also states that "*particular protection will be afforded to the best and most versatile agricultural land (namely Grades 1,2 and 3a of MAFFs [now DEFRA] Agricultural Land Classification)*". The site is a green field and lays within an area of 3 agricultural land.

Policy CL1: Guiding principle to development in the countryside of the MSLP seeks to protect the "*landscape quality and character of the countryside for its own sake*" and only allows development to be sited where it will have "*minimum adverse effect on the appearance of the landscape*".

Policy CS5: Mid Suffolk's Environment of the Core Strategy DPD echoes Policy CL1 stating that "*the Council will protect and conserve landscape qualities taking into account the natural environment...*". It also sets out to protect the district's "*most important components and to encourage development that is consistent with conserving its overall character*".

Babergh Mid Suffolk Joint Local Plan - Emerging

Policy SP03 confirms that the settlement boundaries defined by the earlier current Local Plan have not been reviewed as such are carried forward without change. These may be reviewed as part of the preparation of the Part 2 Plan. Development outside of these retained settlement boundaries will

only be permitted where the site is allocated for development, in an adopted Neighbourhood Plan, or is specifically permitted by other relevant policies of the emerging JLP or in accordance with Paragraph 80 of the NPPF (2021).

Policy SP09 Enhancement and Management of the Environment requires development to conserve, enhance and manage the natural environment and green infrastructure.

Policy LP15 Environmental Protection and Conservation directs development to prioritise reuse of brownfield sites and avoid greenfield land identifies as the best and most versatile agricultural land.

Policy LP17 Landscape states that development must consider impacts on visual amenity and landscape character. They should be sensitive to both the natural and built landscape, seeking to integrate with the surrounding landscape character of the area and reinforce local distinctiveness.

Policy LP23 Sustainable Construction and Design recognises the role of landscaping within climate change adaption and mitigation.

Policy LP24 Design and Residential Amenity seeks to ensure that all new development is of high-quality design, respond to the wider landscape, safeguards existing natural and built environments. Developments must also demonstrate that they have regard to the design principles set out through Suffolk Design, a supplementary planning document and any adopted neighbourhood plans.

Elmswell Neighbourhood Development Plan (Referendum stage)

Policy ELM 1 Planning Strategy states that the focus for new development will be within the settlement boundaries as defined on Policies Map. *“Proposals for development located outside the Settlement Boundary will only be permitted where they are in accordance with national and district level strategic policies.”* The map titled Inset South shows that the site sits outside of the settlement boundary.

Policy ELM 2 Protection of Important Views seeks to protect specific views from *“detrimental visual impact on the key landscape and built development features of those views as identified in the Neighbourhood Plan Assessment of Important Views”*. The September 2023 Appraisal of Important Views identifies 3 views which may be potentially affected by this development.

Review of the submitted documents

The pre application documents and presentation on site demonstrated that the proposed scheme has considered the landscape constraints such as the terrain along with the landscape character and visual effects. The other major constraint identified was potential heritage impact. As a result the developed area has been restricted to the northern end of the site to take advantage of the screening provided by the natural and manmade landform, however the level of visual effect is not yet clear and is unlikely that this can be fully mitigated. The area to the south has been proposed as open space in an effort to retain some of the openness of the site and provide space around the church.

While overall this is a commendable approach the proposal will still bring about development in the countryside therefore likely to cause adverse harm to the landscape character.

In reviewing the layout of the proposed development we have the following comments:

The site is currently in arable use and has only a small amount of existing vegetation and trees within the Red Line Boundary. However the development will need to consider the effects on adjacent trees notably the horse chestnut avenue to the northeast, trees in the church yard to the south, mature oaks on School Rd and the single specimen on the eastern boundary next to the ditch.

The currently single field has been divided by what appears to be hedges. These have also been introduced along the eastern edge of School Rd. It is unclear the intended height for these hedges however this would likely result in a reduction or total loss of views across the site for users of School Road and Pightle open space.

A singular vehicular access is proposed from School Rd. The location is directly opposite a group of mature oak trees on the eastern side of School Rd. We have some concerns that there would be impact on these trees. Potentially there may be a need for lighting of the junction, which may conflict with retention of these trees.

The carpark for the care home building has been situated between the building and the PRoW footpath which will provide some offset for users, though the visual outlook will be onto parked cars.

The larger care home building has been placed in the northwest corner on lower ground to enable the ridge height to be reduced. However if granted this building would form the new western edge of settlement and would be inconsistent with the settlement pattern. Due to its size we would be concerned that this could visually compete in the landscape with the Church and Elmswell Hall.

The proposed layout does not relate well the recent Bloor Homes development to the North of School Road. Which steps back the built form and provides open space along the existing horse chestnut avenue, allowing views of the surround countryside to open up and expand when traveling west out of the village. These views contribute to the sense of place and perception of rural setting. This proposal introduces built form close to the existing avenue of trees and would reduce/remove views to the wider countryside.

The relationship of Plots 7 - 11 to the junction of Parnell Lane and School Road is angular and tight to the boundary which does not respect or reflect the existing development on the Bloor Homes site.

The proposal plan indicates a large area of new planting to the north of the site presumably to screen views of the development from the footpaths to the north and provide a screen/barrier to the railway, no details are provided however while this would link into the existing vegetation to the west along the embankment we are concerned that this would block views of the wider landscape to the north and possibly sever a visual connection between Elmswell Hall and St John's Church. The Heritage officer should be consulted on this matter.

We welcome the inclusion of the community growing area, discussed as orchard and allotments, though the position of these facilities outside of the hedge screened development area needs further thought as allotments can often be visually 'messy'.

There appears to be no parking provision for allotment users. It is unclear if these are solely for use by the development residents or whether these are intended to serve the existing local community. We would recommend that need for these facilities is established.

The area to the south is being proposed as meadow, while this would maintain the visual openness of this portion and improve the biodiversity of the site it would not necessarily be in keeping with the characteristic arable land cover of the Ancient Plateau Claylands landscape.

A network of paths is proposed across the site, both on the developed area to the north and POS to the south. The proposed footpath link along the western boundary would sit within the flood zone to the side of the ditch. Further development and review of the paths would be required to ensure that suitable gradients and materials are used. A discussion was had, though no conclusion was formed about linking to the wider cycle network and whether the proposed position would be suitable in terms of Highway and Heritage requirements. We would have some landscape concerns as should this be approved as a formal surfaced route then this would preclude the open space being used for arable crops.

With regards to accessibility for future residents we have concerns about how the site's topography will be managed, we note some indications of cut and fill and retaining features on the proposed site plan, though insufficient details have been included at this point for us to be able to provide any

detailed feedback.

Also of concern is connectivity to the wider network and services/amenities for aging residents. Due to the location on the edge of settlement and landform, this may result in a reliance on vehicles meaning higher parking demand than are currently proposed.

Other comments, queries and recommendations:

As the area to the south is being proposed to be retained as visually open space, we would welcome any details of how this land will be managed and any measures for protection from future development.

The area to the west of St John's Church is appears to be proposed as woodland. While tree planting is welcomed, we would wish to ensure that this would not have an impact on the setting of the Church, therefore would recommend the this is discussed with the LPA Heritage officer.

Would there be any interest in extending the burial ground for the Church? Again subject to the Heritage officer's guidance.

The SuDS basin for the Bloor Home development is located uphill from plots 22-31 and the main care home car park. We understand that there may also be drainage easements between the basin and the ditch which run across the site. This should be indicated on the plans and the landscape designed accordingly.

The Landscape and Visual notes provided at the site visit reference the Elmswell Neighbourhood Plan and Appraisal of Important Views Documents (April 2022) which are in the process of being adopted. It should be noted that these documents have been updated and we would expect that any forthcoming application uses the most up to date versions of documents.

When conducting the LVIA we would recommend that visibility and effects from open spaces such as The Pightle are considered in addition to PRoW within the wider landscape.

Observation point 2/ Import view 2 was not visited by the group during the meeting due to time constraints but was visited by the landscape consultant afterwards. We accept that views from this point of the developed area would be partially obscured by intervening vegetation and due to the lack of pavements there the receptors would be restricted to those travelling in vehicles.

It should be noted however that views of the developed area site would likely be possible from the A1088 approaching the roundabout, where currently the Church, New Elmswell Hall and a few other scattered buildings and rooftops are visible in the countryside. (Unfortunately safety precluded taking photos, so the below image is provided from Google Streetview for your information only.)



Recommended application documents

To support any forthcoming application we would recommend that the following are submitted:

A **Landscape and Visual Impact Assessment (LVIA)** which follows the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment"(GLVIA3) will need to be undertaken and submitted as part of this outline application and should include:

- Context and character appraisal
- Landscape constraints and opportunities
- Analysis of visual impact from a number of viewpoint locations and key receptors
- Mitigation proposals and recommendations

All visual representation with any submitted Landscape and Visual Impact Assessment (LVIA) should be in line with The Visual Representation of Development Proposals Technical Guidance Note (TGN) 06/19 (Landscape Institute, September 2019) to ensure the assessment of visual impact is accurate and in turn an appropriate judgement of the assessed impacts can be made. For this reason, viewpoint photographs should be formatted accordingly. For instance, visuals should be presented as a single image (390x260mm) with panoramic images for baseline/context information only. This is because panoramas on an A3 sheet are too small to provide a representation of the proposed development.

An **Arboricultural survey and impact assessment** to give us a greater understanding of the impact on trees and hedgerows within the local area. This assessment should be undertaken in accordance with BS 5837:2012 Trees in relation to design demolition and construction recommendations and should provide details on trees and shrubs quality, those to be retained and/or removed, the impact on them and any constraints. Where necessary, methods of protecting trees and other existing features during construction work need to be provided, as well as a schedule of proposed surgery works to be undertaken to those trees and hedges on the application site which are to be retained.

A **Green Infrastructure Strategy** which demonstrates how the proposal will mitigate visual and landscape impact, link with the surrounding movement network and be sympathetic to the site's landscape setting and be sympathetic to the existing settlement context. The strategy should include the following sections:

- Green Infrastructure/Landscape masterplan
- Public open space (POS) – It's important to understand how the proposed POS will be treated
- Hard landscaping – The surface treatment to footpaths, public realm and highways should be aligned with the character of the development, plot and site boundaries, 'gateways' etc and any proposed play features and street furniture
- SUDs strategy – Rain gardens, swales, ditches, rills, ponds, etc.
- Planting strategy – High quality planting along access roads, boundaries and within public spaces should be proposed, details of advanced planting and screening
- Ecological enhancements, bird / bat boxes and habitat hibernacula proposals

A **Landscape Management and Maintenance Plan** should also be submitted, though this could be secured by condition.

We trust the above advice and recommendations are helpful. If you have any queries regarding the matters raised above, please let me know.

Yours sincerely,

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Senior Landscape Consultant

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils. Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.