



Planning Services
Mid Suffolk District Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

20/12/2023

For the attention of: Daniel Cameron

Ref: DC/23/05651; Land To The North And West Of, School Road, Elmswell, Suffolk

Thank you for consulting us on Outline Planning Application (Access to be considered, all other matters reserved) - Erection of Care Village comprising 66 bedroom care home (C2 Use), 40 No. Extra Care Bungalows (C2 Use), Management Office (E(g)(l) Use), Club House, Community Growing Area, Orchard, Community Bee hives and Open Space Provision.

This letter sets out our consultation response on the landscape impact of this outline 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 site sits outside of the settlement boundary of Elmswell as defined within the Elmswell Neighbourhood Plan and therefore should be considered as development in the countryside.

The proposal

The proposal is development of an agricultural field to include the erection of 66 Bed care home, 40 assisted living dwellings (bungalows) and ancillary buildings 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.

History

Pre-Application landscape advice was sought earlier this year, including a site meeting attended by a Chartered Landscape Architect and response was provided by letter dated 12th October 2023. Subsequently, the Babergh Mid Suffolk Joint Local plan Part 1 (2018-2037) and Elmswell Neighbourhood Development Plan (2022-2037) have both been adopted.

Review of the submitted documents

The application is supported by a Landscape and Visual Impact Assessment, Opportunity and constraints plan and Landscape Masterplan.

The submitted Landscape and Visual Impact Assessment (LVIA) has been carried out in line with the principles set out on the third edition of "Guidelines for Landscape and Visual Impact Assessment" (GLVIA3, Landscape Institute, 2013) and includes an assessment of landscape and visual receptors. A series of accompanying Verified view photomontages provide an illustration of the proposed development from a select number of locations and have been prepared inline with the Landscape Institute Technical Guidance Note 06/19 – Visual representation of development proposals.

In summary the Assessment of Landscape Effects considered a number of landscape receptors including the site and its immediate context and judged the effects as ranging from Moderate Adverse to Negligible Adverse at completion, reducing with planting mitigation ranging from Minor Adverse to Neutral. We are generally in agreement with the judgements in relation to effects on the Landscape Character, mainly due to the limited geographical extent of the site however we are of the opinion that the level of impact on the site and immediate context would be unchanged due to the permanent nature if the built development from agricultural to developed land. It should also be noted that the introduction of meadow, orchards, formalised paths etc within the POS would deviate from the current agricultural use, therefore we would judge that the effect would remain at Moderate Adverse. Defined in the submitted methodology as:

Moderate Adverse (Negative) Effect

- *Be at variance or inconsistency with the character of the receiving landscape.*
- *Degrade or diminish the integrity of a range of characteristic elements and features.*
- *Detract from the sense of place.*

The Assessment of Visual Effects considered visual receptors including residents, recreation users of local open spaces including the Churchyard, the extended Public Right of Way Network and users of the rail and road networks. Visual effects ranging from Moderate/Major Adverse in the locale to Negligible or Nil in the long distance, with the assumption that the proposed mitigation planting could reduce the worst visual effects to Moderate Adverse after 15 years. While we do not agree with all the judgements, we agree that overall the long-term visual effects range from Moderate Adverse for some residential receptors to Minor Adverse for road, rail and PROW users.

At a high level the proposal has responded to the wider constraints and opportunities of the site. 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 visual effect cannot be fully mitigated. The area to the south has been proposed as open space in an effort to retain some of the openness, though we note that hedging is proposed along the boundary with School Lane which will result in the loss of views across the site for users of School Lane, reduce the perception of openness and affect the appreciation of the historic buildings within this local landscape.

We have some concerns that the new green space to the north of Parnell Lane, associated with the recently developed housing estate had been designed to provide a strong edge and containment of the settlement, as is noted on the settlement boundary illustrated within the Elmswell NP. While this is yet to mature any development beyond it would be separated by the landscape buffer. This would result in limited opportunities to connect and a disjointed relationship between the two areas of development. Furthermore the proposed scheme layout does not respond well or reflect the local settlement pattern.

While the importance of key views identified within the Elmswell Neighbourhood Plan and the intervisibility of the Church and Elmswell Hall within Heritage and Settlement Sensitivity Assessment have been shown on the Constraints and Opportunities Plan, these have not been fully considered in the proposed scheme. The built form has been placed to retain these views; however areas of proposed planting have been placed in locations, which in time and with maturation, would impinge on these views.

The taller buildings have been placed on the western edge of the site to take advantage of the topography to limit their visual influence, however this would result in a single large elevation of the building facing onto the open countryside.

The agricultural nature of the site plays an important part in the setting and elevates the significance of the Church and Elmswell Hall farm within the landscape, therefore the change of land management practice to orchard and meadow should be more carefully considered. We echo the concerns raised by Historic England on this matter.

We also note that a proposed woodland is located to the west of the church. This would serve to reduce the visibility and prominence of the building within the landscape.

As shown within the submitted documents the site is on a significant slope. We fail to see how this has been accommodated within the development to ensure that the site is suitably accessible for use by the intended elderly population.

Summary

While overall we acknowledge the design development of the scheme has taken a commendable approach. The submitted LVIA demonstrates that this effect will be limited due to its geographical extent however there will still be a harmful, adverse effects to the fabric of the landscape on site and to a limited extent on the district level landscape character in conjunction with some adverse visual effects. The proposal seeks to bring about development in the countryside which we would consider contrary to NPPF para 84, BMSDC Joint Local Plan – Part 1 Policies SP03, LP15, LP17 and LP24 and Elmswell Neighbourhood Plan policies ELM1 and EM2.

Babergh Mid Suffolk Joint Local Plan – Adopted 20th November 2023

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). *Note this is now Para 84 NPPF (20th December 2023).

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 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 – Adopted 24th November 2023

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.

Therefore for the above reasons and from a landscape perspective we are unable to support the principle of this development.

If on balance, you are minded to recommend the application for approval, we would refer you to the recommendations made in our pre-app advice and would welcome the opportunity to provide you with further feedback on the proposed layout.

We trust the above is helpful. If you have any queries regarding the matters raised above, please let me know.

Yours sincerely,

Kim Howell BA (Hons) Dip LA CMLi
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.