

Landscape Proof of Evidence Land at School Road, Elmswell,



Client:
Mid Suffolk District Council

Date:
07 August 2025

Author:
Kim Howell CMLI

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Planning Appeal

Site: Land at School Road, Elmswell, IP30 9NL

Appellant: Christchurch Land & Estates (Elmswell South) LIMITED

Planning Inspectorate Reference: APP/W3520/W/25/3364061

Mid Suffolk District Council Reference: DC/23/05651

Proof of Evidence

Author: Mrs Kim Howell CMLI

Role: Senior Landscape Consultant at Place Services

Date: 07 August 2025

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1 Introduction

Qualifications and Experience

- 1.1 My name is Kim Howell. I am a Chartered Landscape Architect. I appear at this Inquiry on behalf of Mid Suffolk District Council ('MSDC' the Local Planning Authority), and deal with the Landscape matters of the proposals for the *"Erection of Care Village comprising 66 bedroom care home (C2 Use), 37 No. Extra Care Bungalows (C2 Use), 3 No. Almshouses (C3), Management Office (E(g)(I) Use), Club House, Community Growing Area, Orchard, Community Bee hives and Open Space Provision"* at Land to the North and West of, School Road, Elmswell (DC23/05651).
- 1.2 My role is Senior Landscape Consultant working for Places Services, which is a trading arm of Essex County Council specialising in the provision of integrated environmental assessment, planning, design, and management services to the public sector.
- 1.3 I have 26 years' experience in the landscape industry, 16 years of which as a Chartered Landscape Architect in both private and public sector roles.
- 1.4 I work within a team of Landscape Architects, Urban Designers and Planners. Collectively Place Services provide specialist advice to support over 50no. Local Planning Authorities throughout England and Wales, including Mid Suffolk District Council, who we have supported since 2017.
- 1.5 In my role as Senior Landscape Consultant, I have contributed to various landscape assessment and guidance documents and advised on a variety of development sites including strategic housing, renewable energy and commercial sites for local planning authorities in Essex, Suffolk, Sussex, North Northamptonshire and a number of London Boroughs.
- 1.6 I hold a Bachelor of Arts Degree (with Honours) in Garden Design and a Post Graduate Diploma in Landscape Architecture from University of Greenwich.

Declaration

- 1.7 The evidence which I have prepared and provide for this Inquiry reference APP/W3520/W/25/3364061 in this proof of evidence is true and has been prepared and given in accordance with The Landscape Institute's 'Code of Standards of Conduct and Practice for Landscape Professionals' 2021. I confirm that the opinions expressed are my true and professional opinions.

- 1.8 The evidence set out in this statement is provided on behalf of Mid Suffolk District Council and includes my opinions based on my experience. I visited the appeal Site before confirming my acceptance to act as landscape expert witness to this inquiry and in preparation of this statement.
- 1.9 I confine my evidence to landscape and visual matters. My evidence should be read in conjunction with that of Mr Daniel Cameron who provides evidence on planning and planning balance matters, as well as the other witnesses who give evidence on behalf of the local planning authority.

Instruction

- 1.10 In October 2023, Place Services gave preapplication advice for emerging proposals and attended a site visit (DC/23/03703). Further written responses to the Outline application were provided in December 2023 and March 2024 (DC/23/0561) on landscape matters on behalf of Mid Suffolk District Council. These responses can be found in [Appendix A](#). The initial outline application consultation response concluded *“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.”* For clarity, the final paragraph reference to the NPPF is based on the wording of Policy SP03. Upon further consideration we should have made reference to para 174 of the September 2023 NPPF in relation to contributing to and enhancing the natural and local environment (now Para 187 NPPF December 2024).
- 1.11 I have considered the proposed development and the landscape and visual impact this will have on the Site and its countryside setting. I have considered the visual impact of the development on viewpoints within and around the Site area, being guided by the submitted viewpoints using the Public Highway and Public Rights of Way and Site visits undertaken on three separate occasions: 13th September 2023 and 16th July 2025 during daylight hours and 12th July 2025 at night.

Site and Context

- 1.12 The Site is located outside of the settlement boundary to the West of the village of Elmswell, situated to the east of the Mid Suffolk Local Authority area. The Site is accessed from School Road and Parnell Lane. The site currently comprises a roughly rectangular parcel of agricultural land and contains a small amount of vegetation to the boundaries, and some notable trees.

Scope of Evidence

- 1.13 The Council's Planning Committee refused planning permission by a decision notice issued on 29 October 2024. My evidence addresses aspects of Reason 4 for Refusal (RfR) listed within Section B of the Decision Notice:

Reason 4

The proposed development would lead to an irreparable loss of the countryside landscape to the edge of Elmswell. This area creates the entrance to the village itself through the transition from a rural area to an urban area and views of the Church of St. John from the rural area and over the landscape itself are identified within policy ELM2 of the Elmswell Neighbourhood Plan and is also noted to be high quality agricultural land (Grade 2) and adequate justification for its loss is not provided. The impact on the landscape is considered to be harmful with adverse impacts noted with regards to the onsite landscape and to a limited extent on the district level landscape. This is contrary to policies LP15, LP17 and LP24 of the Babergh and Mid Suffolk Joint Local Plan, policy ELM2 of the Elmswell Neighbourhood Plan and paragraph 84 of the NPPF.

Guidance Used in Compiling my Evidence

- 1.14 Within my evidence, and where appropriate, the following published best practice guidance for considering the potential impact on the landscape includes:
- National Planning Policy Framework (NPPF), Department for Levelling Up, Housing and Communities (DLUHC), Latest update – December 2024 (Core Document CD4/1);
 - Planning Practice Guidance (PPG) DLUHC and Ministry of Housing, Communities & Local Government (MHCLG), July 2019;
 - National Design Guide (2019) (Core Document CD4/2)
 - 'Guidelines for Landscape and Visual Impact Assessment, Third edition' (GLVIA3), Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA), April 2013 (Core Document CD8/1);

- Assessing landscape value outside national designations TGN 02/21 (Core Document CD8/2)
- Visual Representation of Development Proposals TGN 06/19 (Core Document CD8/2)
- National Character Area Profiles (2014): <https://nationalcharacterareas.co.uk/> (Core Document CD8/5)
- Suffolk Landscape Character Assessment (2008): <https://suffolklandscape.org.uk/> (Core Document CD8/6)
- Joint Babergh and Mid Suffolk District Council Landscape Guidance (2015): <https://www.midsuffolk.gov.uk/documents/d/asset-library-54706/joint-landscape-guidance-aug-2015> (Core Document CD5/1)
- Elmswell Neighbourhood Plan - Appraisal of Important Views, Supporting Evidence (2023) <https://www.midsuffolk.gov.uk/documents/d/mid-suffolk/elmswell-np-important-views-appraisal> (Core Document CD5/2)

Professional Duty

- 1.15 I understand my professional duty to the Inquiry and have complied, and will continue to comply, with that duty. I declare that the evidence which I have prepared and provide for this appeal is true. It has been prepared and is given in accordance with the guidance of my professional body and I confirm that the opinions expressed are my true and professional opinions.

2 Planning Policy Context

Introduction

- 2.1 The Reasons for Refusal (RfR) referred to the proposal being contrary to Babergh and Mid Suffolk Joint Local Plan- Part 1 policies SP03, SP06, LP15, LP17, LP24, Elmswell Neighbourhood Plan ELM2 and Para 84 of the NPPF.

National Planning Policy Framework

- 2.2 The UK Government published an updated and revised National Planning Policy Framework (NPPF) (Core Document CD4/2) in December 2024, which sets out the environmental, social and economic planning policies for England. Central to NPPF policies is a presumption in favour of sustainable development; that development should be planned for positively and individual proposals should be approved wherever possible.

- 2.3 Paragraph 135 of the NPPF is set out below, which states that planning policies and decisions should ensure that developments:

“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);”

- 2.4 Paragraph 187 of the NPPF states that “Planning policies and decisions should contribute to and enhance the natural and local environment by:”

“(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;”

Planning Practice Guidance

- 2.5 Planning Practice Guidance (PPG) (Green Infrastructure) (Paragraph: 06 Reference ID: 8-006-20190721) clarifies that “*green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place and natural beauty*”.

- 2.6 PPG (Landscape) (Core Document CD4/2 Reference ID: 8-036-20190721) also states that “*The cumulative impacts of development on the landscape need to be considered carefully*”.

Local Plan Policy

Babergh and Mid Suffolk Joint Local Plan- Part 1 (2023)

- 2.7 Local planning policies of the Babergh and Mid Suffolk Joint Local Plan- Part 1 (2023) (Core Document CD5/1) relating to this appeal are listed below:

- 2.8 Strategic Policy SP03 (The sustainable location of new development) states that

“1. New housing development will come forward through extant planning permissions, allocations in made Neighbourhood Plans, windfall development in accordance with the relevant policies of the Plan or Neighbourhood Plans and any allocations which are made in the forthcoming Part 2 Plan.

2. Settlement boundaries are defined on the Policies Map. These boundaries were established in earlier Local Plans and Core Strategies and have not been reviewed as

part of the Plan but are carried forward without change at the present time. The principle of development is established within settlement boundaries in accordance with the relevant policies of this Plan. Outside of the settlement boundaries, development will normally only be permitted where: a) the site is allocated for development, or b) it is in accordance with a made Neighbourhood Plan, or c) it is in accordance with one of the policies of this Plan listed in Table 5; or d) it is in accordance with paragraph 80 of the NPPF (2021).

3. Settlement boundaries will be reviewed, and if necessary revised, as part of the preparation of the Part 2 Plan. The Council will require all new development to accord with the following Spatial Principles where relevant:”

2.9 Policy LP06 (Supported and Special Needs Housing) background and explanation states *“13.20 Opportunities should be taken to integrate older persons housing into the community, in order to address potential issues of isolation and to promote inclusivity. For example, older persons housing on sites that are well related to schools, community centres or other focal points can help to create integrated communities. The Suffolk Healthy Ageing Needs Assessment (2018) identifies tackling social isolation and loneliness as one of its recommendations. There is a particular need for older and vulnerable people to have opportunities to access sustainable transport and modes of travel other than the car.”*

2.10 The policy itself states:

“1. Proposals for supported and special needs housing will be supported where they:

- a) Are located within a settlement boundary and where there is good access to services and facilities, especially health services and public transport;*
- b) Have access to open space designed to meet the needs of residents;*
- c) Have a high quality of design that meets the specific needs of the intended occupiers and is sympathetic to the surrounding townscape and/or landscape.”*

2.11 Policy LP17 (Landscape) requires development “

“1. To conserve and enhance landscape character development must:

- a). Integrate with the existing landscape character of the area and reinforce the local distinctiveness and identity of individual settlements;*
- b). Be sensitive to the landscape and visual amenity impacts (including on dark skies and tranquil areas) on the natural environment and built character; and*
- c). Consider the topographical cumulative impact on landscape sensitivity.*

2. Where significant landscape or visual impacts are likely to occur, a Landscape

and Visual Appraisal (LVA) or a Landscape and Visual Impact Assessment (LVIA) must be prepared to identify ways of avoiding, reducing and mitigating any adverse effects and opportunities for enhancement”

2.12 Policy LP24 (Design and Residential Amenity) states:

“1. All new development must be of high-quality design, with a clear vision as to the positive contribution the development will make to its context. As appropriate to the scale and nature of the development, proposals must:

- a. Respond to and safeguard the existing character/context;*
- b. Create character and interest;*
- c. Be designed for health, amenity, well-being and safety”*

2. In order to achieve this development proposals shall:

- a) Respond to the wider townscape/landscapes and safeguarding the historic assets/ environment and natural and built features of merit;*
- b) Be compatible/harmonious with its location and appropriate in terms of scale, mass, form, siting, design, materials, texture and colour in relation to the surrounding area, ...*
- g) Prioritise movement by foot, bicycle and public transport, including linkages to create/contribute to a ‘walkable neighbourhood’*
- k) Where appropriate demonstrate that the design considers the needs of disabled people and an ageing population and follow Dementia-Friendly Design principles”.*

And part

“3. All developments must also demonstrate that they have regard to the design principles set out through Suffolk Design, the Councils’ Design Supplementary Planning Documents, design documents which support Neighbourhood Plans and/or village design statements. Development which fails to maintain and, wherever possible improve, the quality and character of the area will not be supported.”

Landscape Guidance

Guidelines for Landscape and Visual Impact Assessment 3rd Edition

2.13 The Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) (Core Document CD8/1) sets the standards for the scope and content of landscape and visual impact assessments as well as providing principles that help to achieve consistency, credibility, transparency and effectiveness to Landscape and Visual Impact Assessments.

Landscape Institute Technical Guidance Notes (TGN)

2.14 Visual Representation of Development Proposals TGN 06/19 (Core Document CD8/2). This document aims to help landscape professionals, planning officers and other

stakeholders in the selection, production and presentation of types of visualisations appropriate to the circumstances in which they will be used.

- 2.15 Assessing landscape value outside national designations TGN 02/21 (Core Document CD8/2). This TGN provides information and guidance to landscape professionals and others who need to make judgments about the value of a landscape (outside national landscape designations) in the context of the UK Town and Country Planning system. It is also intended to be of assistance to those who review these judgements, so that there is a common understanding of the approach.

Landscape Character Assessment

National Character Area Profiles (2014) (Core Document CD8/5) and Suffolk Landscape Character Assessment (2008) (Core Document CD8/6) provide baseline information on the characteristics and management of the landscape as a receptor and resource at a National and County level.

3 Evidence Base Context

Appraisal of Important Views - Neighbourhood Plan Evidence Base

- 3.1 An Appraisal of Important Landscape Views (Core Document CD8/3) was prepared for Elmswell Parish Council by Places4People Consultancy in September 2023 to provide evidence for the Elmswell Neighbourhood Plan. The study identifies 7 Important Views within the Neighbourhood Plan Area study area. The Elmswell Neighbourhood Development Plan was formally adopted in November 2023.
- 3.2 The Site is located to the west of the existing settlement edge and subject to 3 views (1, 2 and 4) which look towards or across the site.
- 3.3 Elmswell Neighbourhood Plan, Appraisal of Important Views, (April 2022) states:

View 1 View east from near A1088.

“The parish church, which commands the surrounding landscape, is the key feature of this view. Further unscreened development on the edge of the village, especially along School Road, would have a significant detrimental impact on this view.”

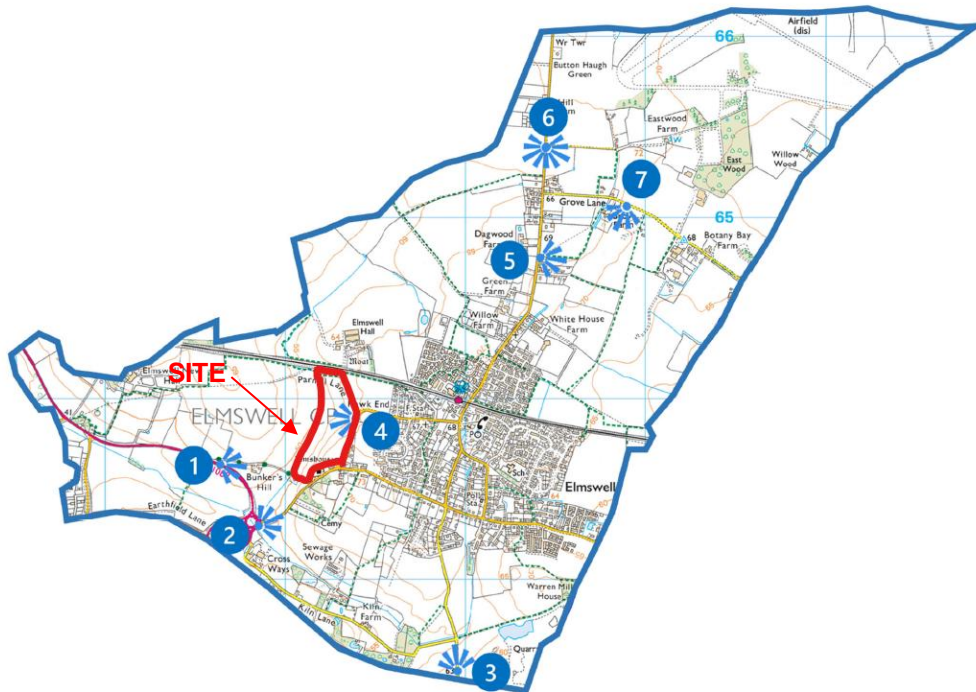
View 3 View north towards the village from the Warren Lane junction with the old A45.

“The importance of trees on the edge and within the village is demonstrated and unscreened development in the foreground or tall development above the tree canopy would have a significant detrimental impact on this view.”

View 4 View south from the village towards Woolpit and Haughley Park.

“The view has recently been impacted by the industrial development adjoining the A14 but otherwise the long distance views are significant and further development should be carefully designed to reduce further impact.”

The proposed development will be viewed from each of these viewpoint locations.



Map 1 – The identified Important Views

*Figure 1: Site in context of Appraisal of Important Views (2023)
for Elmswell Neighbourhood Plan evidence base*

4 Methodology

- 4.1 The following landscape and visual impact judgements have been made using the Appellant’s LVIA methodology. Where definitions were missing from the Appellant’s LVIA we have provided our own for reference. I have reviewed and assessed the landscape and visual receptors’ value, susceptibility and sensitivity, along with a review of the potential scale of effect and overall effect at completion and year 15. This assessment process has been undertaken in addition to reviewing the submitted LVIA in line with Landscape Institute Technical Guidance Document; Reviewing Landscape and Visual Impact Assessment (LVIAs) and Landscape Visual Appraisals (LVAs) (TGN 1/20).

5 Landscape Character Baseline, Context and Setting

Site Context

- 5.1 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 accessed from the east on School Road and Parnell Lane.
- 5.2 The Site measures approximately 11.5ha in size and comprises a roughly rectangular piece of agricultural land currently in use for arable crop production. It is identified as Grade 2 Agricultural Land (Provisional Agricultural Land Classification Grade; Natural England).
- 5.3 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 the boundary is Parnell Lane, a horse chestnut lined avenue leading to Elmswell Hall, beyond which is newly developed residential housing (Planning ref no. DC/18/02146). 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 BT440/T1). 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.
- 5.4 The site is sloped with the predominant slope being from high in the east to low in the west. There is also a fall from north to south and some subtlety in the complexity of the slopes, with areas of steeper incline to the south/southwest of the site and a valley/change of direction in the falls approximately in line with the mature oak on School Road.
- 5.5 Approximate levels (+AOD) along the eastern boundary are 60.8m to the north, 64.4 at the junction between Parnell Lane and School Road and 70.4m at the junction of School Road and Church Road. Along the western boundary the levels are approximately 53.4m to the north, 51.1 m to the middle and 49.0m to the south. The railway is elevated in comparison to much of the site, but has not been included in the topographical survey, the nearest spot height on the access track for over-height vehicles is noted as 63.47m.

Landscape Character Assessments

National

- 5.6 The Site lies within the National Character Area (NCA) Profile **83: South Norfolk and High Suffolk Claylands**, close to southwestern extent. (Core Document CD8/5).
- 5.7 The Environmental Opportunities include [but are not limited to]:
- *“Encouraging sustainable farming practices and the diversification of cropping and livestock to support the continued production of food supplied to local and national markets and the financial security of rural businesses*
 - *Encouraging the retention and enhancement of historic features and heritage assets including their setting in the farmed landscape, for example moated farmsteads and the biodiversity of their moats, barns and other farm buildings, windmills and watermills, and churches to local and national markets and the financial security of rural businesses.”*
- 5.8 The NCA is dominated by flat plateau claylands, with underlying chalk geology. The plateau is incised by numerous small-scale wooded river valleys with complex slopes that in places are much unexpected for East Anglia. It should be noted that *“to the south it meets the South Suffolk and North Essex Clayland NCA [NCA 83] with its noticeably more undulating topography.”*
- 5.9 The Appellant’s LVIA provides an analysis of the relevant characteristics found on site and judges that *“changes occurring at a Site scale in the context of the NCA as a whole will be small-scale and not likely to impact upon landscape character as defined at a National level.”*
- 5.10 Upon review of the published documents, I am of the judgement that the NCA has **Medium** value. At a national scale the site would have capacity to accept some development, therefore I would consider the susceptibility to be **Low**. When combined, I judge the overall sensitivity to be **Medium-Low**, which while no judgement was provided by the Appellant’s LVIA findings we would agree their concluding statement as above

County

- 5.11 The Site lies within the Ancient Plateau Claylands character area of the Suffolk Landscape Character Assessment (Core Document CD8/6).

Ancient Plateau Claylands

- 5.12 Key characteristics of the Ancient Plateau Claylands LCA, which occurs across three areas of Suffolk County. The site being within the arc to the North of the Gipping Valley. Those characteristics relevant to the site and its setting are highlighted in **bold**:
- **Flat or gently rolling arable landscape of clay soils dissected by small river valleys**
 - **Field pattern of ancient enclosure – random patterns in the south but often co-axial in the north. Small patches of straight-edged fields associated with the late enclosure of woods and greens**
 - **Dispersed settlement pattern of loosely clustered villages, hamlets and isolated farmsteads of medieval origin**
 - Villages often associated with medieval greens or tyes
 - Farmstead buildings are predominantly timber-framed, the houses colour-washed and the barns blackened with tar. Roofs are frequently tiled, though thatched houses can be locally significant
 - **Scattered ancient woodland parcels containing a mix of oak, lime, cherry, hazel, hornbeam, ash and holly**
 - **Hedges of hawthorn and elm with oak, ash and field maple as hedgerow trees.**
 - Substantial open areas created for WWII airfields and by 20th century agricultural changes
 - **Network of winding lanes and paths often associated with hedges create visual intimacy**
- 5.13 The overall character of the LCA comprises arable farmland by an irregular sinuous field pattern and sporadically scattered with woodland. Settlement is scattered throughout the landscape, with frequent pairings of medieval church and manorial halls, usually on valley side locations close to water supply, some of these ‘church and hall’ clusters have grown into hamlets or villages.
- 5.14 The condition of the LCA overall has declined due to thinning of historical field patterns to accommodate modern agricultural intensification, however, enough remains to contribute to the distinctive rural character of this LCA.
- 5.15 The accompanying LCA Guidance Note identifies Key forces for change may include settlement expansion and change of land use for recreational uses. In relation to settlement expansion the development management advises *“Parishes in this landscape tend to consist of multiple clusters of varying sizes. The release of land for development should, if at all possible, reflect the local pattern. Ribbon development destroys this*

pattern and can have a considerable impact on the wider landscape. When vernacular styles and detailing are used for housing or other development the choice should echo that of the immediate locality or the specific cluster in which the development is proposed.”

- 5.16 Development on the valley side in this location would have a **Medium** sensitivity within this LCA, owed to the presence of Church and Hall pairing on locally prominent ground and the relative complexity of the topography which contributes to the appreciation of the river valley.
- 5.17 The Appellant’s LVIA judges the Ancient Plateau Claylands LCA to have **Medium** value, which when combined with a judgement of **Medium** susceptibility forms an overall **Medium** sensitivity judgement. We would agree with the Appellant’s judgement on the assessment of sensitivity of this LCA.

Rolling Valley Farmlands & Furze

- 5.18 The site sits adjacent to the Rolling Valley Farmlands & Furze LCA. This LCA contributes to a lesser extent on the setting of the site but has been considered in the LVIA. Some of Key characteristics relating to this LCA area present on site are highlighted in **bold**:

- **Valleys with prominent river terraces of sandy soil**
- **Small areas of gorse heathland in a clayland setting**
- **Straight boundaries associated with late enclosure**
- Co- axial field systems
- **Mixed hedgerows of hawthorn, dogwood and blackthorn with oak, ash and field maple**
- **Fragmentary cover of woodland**
- **Sand and gravel extraction**
- Golf courses
- Focus for larger settlements

- 5.19 This LCA can be found in three areas of the county associated with the main rivers and tributaries, the site being located towards the upper Gipping Valley. The overall character of this LCA relates to the well-drained river terraces and sloped valley floors which were historically grazed but have increasingly been farmed for arable crops. *“The landscape has good tree cover but views are more open in the transition between valley and plateau landscapes”.*

- 5.20 Similarly to the Ancient Plateau Claylands LCA, key planning and land management issues include the potential residential expansion and land use changes and introduction of new agricultural techniques.
- 5.21 The LVIA judges the LCA has a **Medium** Value, **Medium** susceptibility and subsequently **Medium** sensitivity to change. We would agree with the Appellant’s judgement on the assessment of sensitivity of this LCA.

6 Landscape Character Impacts

- 6.1 Policy SP03 (The sustainable location of new developments) of the Babergh and Mid Suffolk Joint Local Plan- Part 1 (2023) (Core Document CD5/1) states that “*Outside of the settlement boundaries, development will normally only be permitted where:*
- a) the site is allocated for development, or*
 - b) it is in accordance with a made Neighbourhood Plan, or*
 - c) it is in accordance with one of the policies of this Plan listed in Table 5; or*
 - d) it is in accordance with paragraph 80 of the NPPF (2021).”.*
- 6.2 Policy LP15 (Environmental Protection and Conservation) of the Babergh and Mid Suffolk Joint Local Plan- Part 1 (2023) (Core Document CD5/1) sets out that Babergh Mid Suffolk District Council (BMSDC) should ensure “*Development proposals must demonstrate appropriate consideration of the following: 2a Previously developed land will be prioritised. Where development needs to take place on greenfield land, avoidance of the best and most versatile agricultural land should be prioritised”*
- 6.3 Policy LP17 (Landscape) of the Babergh and Mid Suffolk Joint Local Plan- Part 1 (2023) (Core Document CD5/1) states that “*To conserve and enhance landscape character development must:*
- a. Integrate with the existing landscape character of the area and reinforce the local distinctiveness and identity of individual settlements;*
 - b. Be sensitive to the landscape and visual amenity impacts (including on dark skies and tranquil areas) on the natural environment and built character; and*
 - c. Consider the topographical cumulative impact on landscape sensitivity.*
- 2. Where significant landscape or visual impacts are likely to occur, a Landscape and Visual Appraisal (LVA) or a Landscape and Visual Impact Assessment (LVIA) must be prepared to identify ways of avoiding, reducing and mitigating any adverse effects and opportunities for enhancement.”*

- 6.4 The application has considered the impacts on the landscape character and setting, however the landscape character impacts arising from the permanent change in land use will still be long term and adverse. It is my opinion that some of the higher value elements of the site and immediate setting will be affected, resulting in unacceptable harm to the character of the site and its immediate setting.

Landscape Character Areas

NCA Profile 83: South Norfolk and High Suffolk Claylands

- 6.5 The development, once completed, will not influence a wide area of the NCA and will be located in proximity to existing urbanising features in the area. For this reason, I judge the magnitude of change at completion is judged to be **Low**. However, given the encroachment into the surrounding countryside and in turn, the urbanising effect on the surrounding rural landscape, the scale of effect is deemed to be **Minor Adverse** on this receptor.

Ancient Plateau Claylands

- 6.6 The development, once completed, will not influence a wide area of the LCA and will be located in proximity to existing urban features in the area. However, the development would detrimentally affect the relationship between the Church and Hall which is identified as a key feature within this LCA.
- 6.7 I would also judge that the development would have a localised adverse impact in appreciation of the sloping valley setting.
- 6.8 While the LCA Landscape Management Guidelines seeks to *“maintain the extent, and improve the condition, of woodland cover with effective management, especially if this is economically viable”* the introduction of proposed woodland planting in this location would not be sympathetic to the open views which are characteristic of this LCA.
- 6.9 The development is located on the valley side and introduces a built form on the side of the slope and would result in the need for significant ‘terracing’ to achieve level platforms for the buildings and associated amenity spaces. This would be incongruent with the landform.

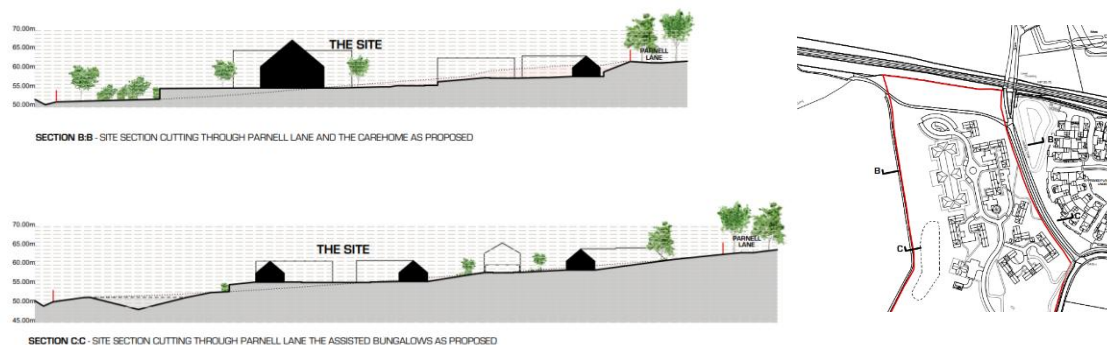


Figure 2: Illustrative sections showing existing and proposed levels.

- 6.10 At completion, the Appellant’s LVIA judges that the magnitude of change is **Negligible to Low** forming a **Minor Adverse** overall effect. After 15 years, the LVIA judges a **Negligible to Low** magnitude of change and a **Negligible Adverse** overall effect.
- 6.11 The LVIA also justifies the magnitude of change judgement by stating “6.41. *Whilst the physical changes would be limited to the Site area only, the perception of change in terms of landscape character will extend a very limited distance beyond the Site area. However, given the containment (physically and visually) by the existing settlement edge, the rising topography to the north, west and south, the perception of any change in character will be restricted and highly localised. This limits the magnitude of impact in terms of spatial area and scale.*”. Although the scale of the development partly contributes to reducing the magnitude of change within the LCA, the permanence of the proposals is a contributing factor which in my opinion would increase the magnitude of change judgement.
- 6.12 The LVIA states that “*Change to the character include the extension of the settlement edge into the current agricultural context in this small parcel of the wider Site area. However, such a change would be experienced against the backdrop of the existing and more elevated settlement edge. This settlement edge forms part of the baseline against which the impacts on the Site are set and consequently contributes to limiting the overall degree, or magnitude, of impact.*”. While the recently built Bloor Development would be part of the baseline for the proposals it would be remiss to fail to acknowledge the structural landscaping which has been installed as visual mitigation for that development, screening and softening along the western edge which abuts Parnell Lane. We accept that this is yet to mature however it is foreseeable that this will provide adequate screening and containment of this site and will form a contained edge to the settlement of Elmswell.

- 6.13 Based on the above, and the Appellant’s criteria for determining magnitude of landscape impacts I judge the magnitude of change to be **Medium**.

“The size and scale of change is considered moderate due to the extent and proportion of loss of existing landscape elements or the degree of alteration to aesthetic or perceptual aspects.

The nature and scale of change to key characteristics which are critical to character is considered moderate.

Where the geographical extent would influence the landscape at a local scale, i.e. a single landscape character area/type (or potentially multiple areas/types where a site is located on the boundary between areas).

Duration of impacts would be considered midterm and where the potential reversal of the impact is likely and in practical terms would be difficult to achieve.” In turn the scale of effect at Completion to be **Moderate Adverse**.

- 6.14 Over time, although proposed planting will have predominately established, the impact on sensitive LCA qualities will not diminish and the new highly visible roofscape will remain. This will form a material adverse change to the landscape baseline affecting the landscape as resource, therefore, I would also judge that the magnitude of change at Year 15 will be **Medium** and the overall scale of effect to be **Moderate adverse**.

Rolling Valley Farmlands & Furze

- 6.15 The development sits outside, but adjacent to this LCA on its Southern boundary, once completed, will have little to no influence a wide area of the LCA. We agree with the Appellant’s judgement of **None to Negligible** magnitude of change on the LCA as a receptor and **Negligible adverse**, to **Neutral** overall effects.

Site and Immediate Context

- 6.16 The baseline character of an undeveloped open pastoral field comprising occasional mature trees which reflects a rural landscape will receive adverse landscape harm through the introduction of the proposed development.
- 6.17 The character of the site would completely change as a result of the development proposals, from a rural character, albeit on the edge of settlement to an urbanised development which is not consistent with the countryside setting. The development is proposed on a sloping face on the outskirts of the town of Elmswell. Within Elmswell development is generally on top of the flat plateau, therefore this proposal would not be congruent with the settlement pattern and is therefore at odds with the character of the immediate surrounding context.

- 6.18 The intrinsic qualities of the rural, open agricultural character perceived on approach to and on leaving Elmswell would be lost as a result of the development, including the urbanised wildflower meadow amenity area, conflicting with the requirements of Policy 17 and ELM1.
- 6.19 At completion, the LVIA judges that the magnitude of change is **Medium** forming a **Moderate Adverse** overall effect. The Appellant's LVIA judges that the effect would reduce to **Minor Adverse** with which I disagree and provide further commentary in Section 9.
- 6.20 Over time, although proposed planting will have predominately established, the impact on sensitive qualities of the site and its immediate setting will not diminish. A new highly visible roofscape will remain as will the changes to land use. This will be a material adverse change to the landscape baseline. Therefore, I would also judge that the magnitude of change at Year 15 will be **Medium** and the scale of effect to be **Moderate adverse**.
- 6.21 Due to the notable change of land use across the entire site, not just on the quantum of built form, when considered in combination with the permanence of the proposed development, I judge that the magnitude of change to be **Medium to Medium-High** at completion and the overall effect upon completion is judged to be **Moderate Adverse**, described in the Appellant's LVIA as *“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.”* with no change at 15 years.
- 6.22 I provide the below as a quick reference where differing judgements have been made in relation to landscape effects.

Table 1 Extract of Appendix B Comparative Landscape Effects

Ref	Judged Sensitivity of Landscape Receptor			Judged Magnitude of Landscape Effects		Overall Landscape Effect	
	Value	Susceptibility	Sensitivity	Magnitude of change at completion	Magnitude of change at 15 years	Overall Effect Upon Completion	Overall Effect at 15 Years Post Completion
National Landscape Character							
NCA 83: South Norfolk and High Suffolk Claylands	Not given	Not given	Not given	Not given	Not given	Not given	Not given
	Medium	Low	Medium-Low	Negligible	Negligible	Negligible	Negligible
Suffolk Landscape Character							
Ancient Plateau Claylands	Medium	Medium	Medium	Negligible to Low	Negligible to Low	Minor Adverse	Negligible Adverse
				Medium	Medium	Moderate Adverse	Moderate Adverse
Rolling Valley Farmlands & Furze LCA (adjacent LCA)	Medium	Medium	Medium	None to Negligible	None to Negligible	Negligible Adverse	Neutral
Site and immediate setting							
The Site and Immediate setting	Medium	Medium	Medium	Medium	Medium	Moderate Adverse	Minor Adverse
				Medium to Medium-High	Medium to Medium-High		Moderate Adverse

Purple text – Pegasus LVIA

Orange text – Kim Howell Place Services (only where judgements differ)

*Significant effects i.e. greater than **Moderate Adverse** shown in bold

7 Visual Impacts

Representative viewpoints

7.1 The LVIA considered a number of visual receptors. The following receptors have been identified within the LVIA as having a significant effect (Moderate Adverse or higher) at Completion stage or at 15 Years post completion.

- Viewpoint 4: View looking north at St John's Church, Moderate Adverse for residential receptor at completion.
- Viewpoint 5: View looking north-east from Church, Moderate Adverse for user of Church Lane at its western extent beyond St John's Church.
- Viewpoint 14: View looking north-west from open space adjoining Pightle Close, Moderate Adverse for residential receptors at Completion.

7.2 We are generally in agreement with the above judgements.

7.3 In addition, we identify the following receptors for which our judgements would vary.

Table 2 Extract of Appendix C Comparative Visual Effects

Ref	Visualisation on type and location	Judged Sensitivity of Visual Receptor		Judged Magnitude of Visual Effects		Overall Landscape Effect at Construction Phase	
		Receptor type(s)	Sensitivity	Magnitude of change at completion	Magnitude of change at 15 years	Overall Effect Upon Completion	Overall Effect at 15 Years Post Completion
VP 2 (VV 4)	View looking south-east from public footpath (Elmswell 14).	PRoW	High	Medium	Medium	Moderate to Major Adverse	Minor Adverse
				High to Medium-High	High to Medium-High	Major Adverse	Major to Moderate Adverse
VP 3	View looking south-east from public footpath (Elmswell 14).	PRoW	High	Low to Medium	Medium	Moderate Adverse	Minor Adverse
				Medium-High	Medium-High	Major to Moderate Adverse	Moderate Adverse
VP 9	View looking south-southeast from public footpath (Norton 7).	PRoW	High	Negligible to Low	Negligible	Minor Adverse	Neutral / Negligible Adverse
				Low to Medium	Low to Medium	Moderate Adverse	Moderate Adverse
VP 12	View looking south from public footpath (Norton 35) east of The Grove.	PRoW	High	Negligible	Negligible	Negligible Adverse	Neutral
				Low to Medium	Low to Medium	Minor Adverse	Minor Adverse

Purple text – Pegasus LVIA

Orange text – Kim Howell Place Services (only where judgements differ)

*Significant effects i.e. greater than **Moderate Adverse** shown in bold

Representative Viewpoint (VP) (IV indicated approximate alignment with Neighbourhood Plan Important Views, VV indicated approximate alignment with Verified View)

7.4 Users of PRoW Elmswell 14 are represented by Viewpoint 2 and Viewpoint 3. We would judge that the Magnitude of change of the receptors would be higher than stated in the LVIA due to the significant change in the visual experience. PRoW 14 runs southeast to northwest through an agricultural landscape, generally following the rectilinear field boundaries. The most northeasterly section of the Footpath runs adjacent to the elevated Railway through the site. While the railway embankment is considered a detracting factor,

I would not judge that this has a significant adverse effect on the perception of traveling through a rural landscape. While settlement is currently evident when travelling in an easterly direction, the development is set behind a vegetated edge. Receptors would see the front face of the houses with gaps in the roofscape between individual properties laying on the western edge of the settlement. Due to the sloped topography of the site the proposed development would result in layering of roofs and buildings which I would judge to have a more significant visual presence than the current baseline. For comparison see [Table 2](#) above or [Appendix C](#).

- 7.5 Users of PRow network to the north of the site are represented by Viewpoint 9; Norton 7 and Viewpoint 12; intersection of Norton 35 and Norton 31. I would judge that the Magnitude of change of the receptors would be higher than stated in the LVIA. When travelling in a westerly (VP12) or southerly (VP9) direction St John's Church is a notable landmark. I have concerns that the tree planting to the north of the development in conjunction with the proposed amenity areas to the south would detrimentally alter views of this landmark and reduce appreciation of its setting within the wider agricultural landscape. While the extent of change within the wider view would be limited, I would judge that the magnitude is increased by the alteration to the composition of the view towards the landmark building which I would consider a visual focal point. In addition, with reference to the LVIA methodology the duration of proposed development would not be temporary or easily reversed. A montage was not provided to illustrate views from the North to rule out the above concern. For comparison see [Table 2](#) above or [Appendix C](#).
- 7.6 Viewpoint 1 identifies effects for receptors along the Parnell Lane, I agree that the magnitude of change would be **Medium to High** at both completion and at 15 years. But I fail to see how the resulting effect would reduce from **Moderate to Major Adverse** (road), **Moderate to Major Adverse** (residential) to **Negligible to Minor Adverse** (recreation [note that the stated receptor type changed within the Appellant's LVIA which may alter the sensitivity of the receptors and resulting level of effect.]) and **Minor Adverse** (residential).
- 7.7 Based on the above and the agreed judgements from the Appellant's LVIA, I judge the range of effects experience by the identified receptors to range from **Major Adverse** at worst to **Negligible or Nil** in the longer distance at completion. I acknowledge that for some receptors the proposed mitigation would enable the development to be softened. This could lessen the visual effects at 15 years allowing some of these judgements to reduce to **Moderate Adverse** for some residential receptors; **Minor Adverse** for road, rail and PRow users. However, my judgements for Viewpoints 9 and 12 would remain unchanged due to detrimental effects of the proposed landscaping scheme resulting in

harm to the openness and appreciation of the wider landscape and setting of key landmark buildings.

- 7.8 Elmswell Neighbourhood Plan Policy ELM2 identifies Important Views within and from Elmswell. Important Views (“IV”) 1,2 and 5 cross or look into the site. IV1 corresponds with Verified View 1, IV2 corresponds with Verified View 2. IV5 is not represented by a Verified View, the closest Viewpoint would be VP1, though this is further north along Parnell Lane.

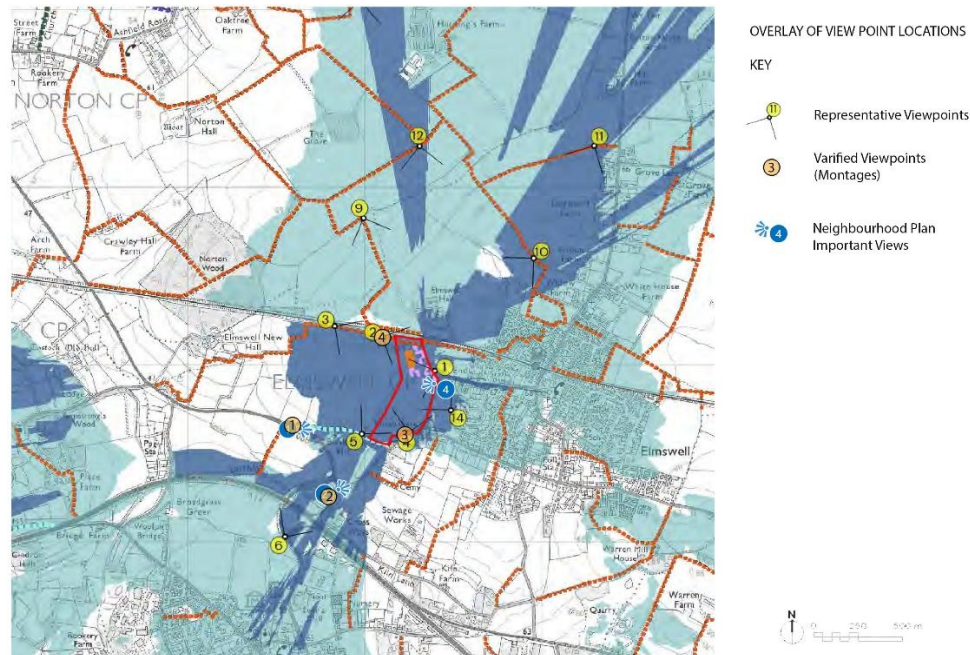


Figure 3 Overlay of Representative and Verified views from the LVIA and Important Views as defined by the Elmswell Neighbourhood Plan (see Appendix D for larger copy).

- 7.9 While Verified View 1 corresponds with Important View 1 this is located behind a hedge and does not represent the ‘worst case’ effects which would be more evident from Viewpoint 5



Figure 4 Verified View 1 Appellant's LVIA.



Figure 5 Viewpoint 5 Appellant's LVIA.

8 Encroachment into countryside

- 8.1 In landscape terms the site lays outside of the defined settlement boundary, is not an allocated site and is not proposed in accordance with adopted Neighbourhood plan, therefore I would also consider this to be contrary to Policy SP03.
- 8.2 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.”*

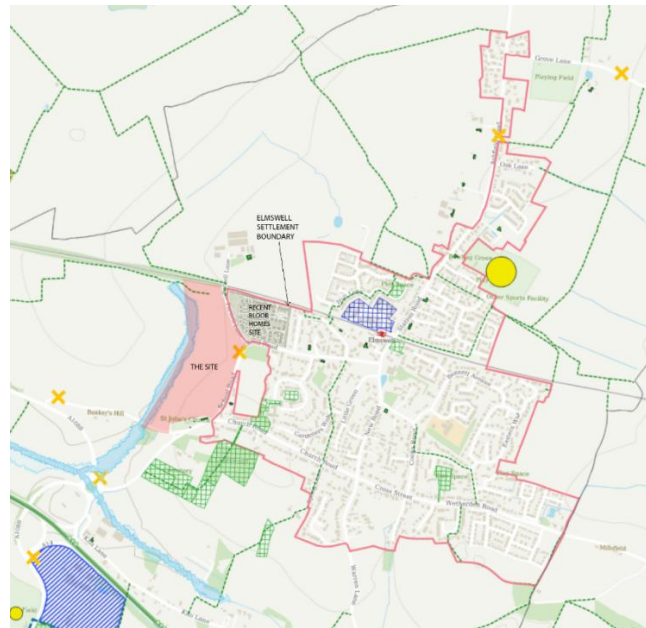


Figure 6 Settlement boundary of Elmswell as defined by the BMSDC Local Plan and Elmswell Neighbourhood Plan (See Appendix E for larger copy).

- 8.3 It is my opinion that no mitigation measures can be proposed which would remove or reduce the effects of encroachment into the countryside by virtue of the site location outside of the settlement boundary, and that the only action would be avoidance.

9 Other areas of landscape and visual concern

Settlement Pattern

- 9.1 The settlement pattern of Elmswell is generally limited to the flatter areas at the top of the plateau with very little development on the sloped periphery.
- 9.2 The recent development at the Bloor Homes site forms the new settlement edge of Ellmswell (revised as part of Elmswell NP ELM01). The Bloor Homes site sought to provide a defensible edge to the settlement in providing a vegetated area of open space to the western boundary. The built form has been set back along Parnell Lane to create this space and was also set back from School Road so that view of the open countryside to the west can be observed. The built form provided gaps between individual buildings, which when viewed from the west/southwest would help to break up any visual mass.
- 9.3 The Appeal proposals fail to respond to and these design features. Furthermore, the proposed development would place its tallest, single mass building at western side of the development, closest to the open countryside.

Proposed new tree plantation

- 9.4 While there is an element of tree and scrub vegetation existing along the Railway embankment the proposal would introduce a significant new vegetated edge along the northern edge of the site, wrapping around the northern portion of the western boundary. This has been proposed to reduce visual effects when viewed from the north. However, in proposing this I have concerns that this further reinforces the Railway as the dominant feature in the landscape. This would also have a harmful effect on the appreciation of the wider landscape setting from the Neighbourhood Plan Important Views
- 9.5 There is additional tree planting proposed to the west of the Church in the south of the site which, once matured could affect the setting of the Church and the appreciation of its prominent, elevated location.

Proposed new hedge planting

- 9.6 The proposed new hedge planting along School Road has potential to create a visual barrier for users of School Road. This would result in a loss or harmful effect on the appreciation of the wider landscape setting from the Neighbourhood Plan Important Views and the experience of arrival into/departure from Elmswell.

Proposed new flower meadow

- 9.7 The proposed new flowering meadow would constitute a change from the agricultural use having a more municipal perceptual quality, especially noting the proposed mown paths. The introduction of which will fail to respond to the landscape criteria within the LCA.

Proposed growing space and community orchard

- 9.8 The proposed new community orchard would constitute a change from the existing agricultural use which would not be in keeping with the surrounding arable use as set out within the LCA. Visually these could have a messy appearance and would have an urbanising effect.

Proposed surfaced paths

- 9.9 The proposed new surfaced path to south of the site would have an urbanising influence on the site and would be harmful to the landscape character and agricultural setting of Elmswell.

Amenity landscape

- 9.10 The built form within the northern area of the site appears to be proposed as with a communal area of amenity landscape. We would question how much of this will be physically accessible to residents on the sloping terrain and also draw attention to the quantity of engineered retention that has been indicated. (Dwg Ref 1661-CAM-XX-XX-DR-A-SK09; Site Plan As Proposed Showing Levels)

Response to sloping site

- 9.11 The Proposed development would require significant alterations of the existing sloping site to accommodate level building platforms, accommodating drainage space, creating accessible amenity areas and pedestrian routes. These would require a heavily engineered response to the sloping landform which would not respect the sloping valley side of the site. Evidence of these changes can be found in the indicative levels and drainage strategy drawings (Dwg Ref 1661-CAM-XX-XX-DR-A-SK09; Site Plan As Proposed Showing Levels and Dwg Ref BM12457-001_RevD; Indicative Drainage Strategy and Dwg Ref 1661-CAM-XX-XX-DR-A-PL08_RevB; Site Sections As Existing and Proposed)
- 9.12 40 No. single storey bungalows are proposed with a two-storey care home which has been placed at the lowest point of the site and would require the largest amount of level parking and communal amenity space.

10 Summary and Conclusions

Landscape Character Impacts

- 10.1 The height, scale, layout and massing of the Appeal proposals fail to recognise or adequately address the sensitivities of Landscape Character the site falls within and the fabric of the landscape on which it sits.
- 10.2 I conclude that the development will result in unacceptable harm to the character of the countryside contrary to BMSDC Policies SP03, LP15, LP17 and LP24 and Elmswell Neighbourhood Plan policies ELM1 and EM2 and the NPPF.

Visual Impacts

- 10.3 The development will result in significant visual effects which cannot be adequately addressed by the proposed landscape mitigation scheme.
- 10.4 I conclude that the development will result in unacceptable visual effects for multiple receptors contrary to BMSDC Policies SP03, LP15, LP17 and LP24 and Elmswell Neighbourhood Plan policies ELM1 and ELM2 and the NPPF.

Encroachment

- 10.5 The Appeal proposals would bring about built development outside of the defined settlement boundary and should be considered as development in the countryside.
- 10.6 I conclude that the development will result in unacceptable harm by introducing built form and other urbanising features within the countryside contrary to Policies SP03, LP17 and ELM2 and the NPPF

Other areas of landscape and visual concern

- 10.7 The proposed tree and hedgerow planting proposed as part of the visual mitigation of the built form would result in loss of openness and important views as identified within the Elmswell Neighbourhood Plan There would also be a loss/weakening of the visual connection between Elmswell Hall and St John's Church created by the proposed mitigation planting.
- 10.8 I conclude that the development will result in unacceptable harm by causing the introduction of screen planting that will result in adverse visual impacts contrary to Policy LP06, LP17, LP24 and ELM2, NPPF and landscape criteria set out within the LCA.

- 10.9 The sites topography is not sympathetic to the future intended user/occupiers. The site would require extensive remodelling of levels to accommodate the proposed development and manage surface water run off through the landscaped grounds.
- 10.10 I conclude that the development would result in an over engineered landscape to enable the proposed development to be viable and would judge it to be contrary to Policies LP06, LP17, LP24 and the NPPF.

Appendix A:

Preapplication advice October 2023 (DC/23/03703) and written responses December 2023 and March 2024 (DC/23/0561)

Appendix B: Comparative Landscape Effects

Appendix C: Comparative Visual Effects

Appendix D:

Overlay of Representative and Verified views from the LVIA and Important Views as defined by the Elmswell Neighbourhood Plan

Appendix E:

Figure 6 Settlement boundary of Elmswell as defined by the BMSSDC Local Plan and Elmswell Neighbourhood Plan