

Dr. & Mrs. D. Brennand
Red House
Hadleigh Road
Sproughton
Ipswich
IP8 3AT

23 June 2021

Dear Sirs,

DC/21/02671: Outline planning application re. land north of the A1071, Ipswich (the “Application”)

We refer to the above Application by Taylor Wimpey UK Ltd (the “**Applicant**”).

We live at Red House Farm, Sproughton (as defined below), where we have lived for the past 10 years.

As residents of Sproughton Parish and custodians of Red House Farm, who will be significantly adversely impacted by the proposed development of the land which is the subject of the Application and commonly known as Chantry Vale (the “**Site**”), we have considered the Application and related documents.

We object to the Application on the basis of:

the previous planning and appeal decisions relating to planning application B/1144/86 dated 10 December 1986, concerning land which is the subject of this Application, the substance and conclusion of which remain pertinent today;

the adverse impact the proposed development would have on the grade II listed Red House and its associated listed barn (“**Red House Barn**”) (together “**Red House Farm**”) and their setting;

the irreversible loss of a unique and special rural and agriculture landscape that would result;

the heightened risk of flooding the Application presents; and

further issues arising from the Application.

We provide the detailed basis of our objection below.

We would also draw your attention to our submission (the “**Submission**”) in response to the 2019 ‘Babergh and Mid Suffolk Joint Local Plan Preferred Options (Regulation 18) Consultation’ (the “**JLP Consultation**”) in respect of proposed land allocation LA013 – Land North of the A1071, Sproughton (i.e. the Site), which also assessed the ‘Vision Statement’ published by the Applicant at that time for the Site and which forms the basis of the proposals outlined in the Application (the “**Vision Statement**”). Our Submission was accompanied by a comprehensive Heritage Impact Assessment of Red House Farm undertaken in September 2019 by Michael Collins¹ (the “**HIA**”), in addition to a

¹A reputable listed building planning consultant with specialist local knowledge and more than 30 years’ experience

Landscape Appraisal by Alison Farmer Associates Ltd² and a hydrology and drainage review by JPC Environmental Services (the “**JPC Report**”)³. Given the ongoing challenges posed by COVID-19, and the limited timeframe for responding to the Application, it has not been possible to have these reports updated in light of the Application. However, given that the Vision Statement largely forms the basis of the Application, the Submission and the appended reports remain relevant. A copy of the Submission (and its related appendices) is attached; it forms part of, and should be read in conjunction with, this objection.

Basis of Objection

Previous Planning and Appeal Decisions

By a notice dated 14 May 1987, Babergh District Council rejected a proposed development of land comprising land which is the subject of the Application on the basis that (among other things):

‘The application involves the carrying out of development which would break through a strong existing visual edge to Ipswich into an area of attractive countryside the environment of which would be unacceptably disturbed. In addition, a number of significant views into the area would be seriously and adversely affected’ (reason 3)

The subsequent appeal (the “**1988 Appeal**”) against Babergh District Council’s decision was also unsuccessful. In his decision the Planning Inspector found that:

‘In assessing the weight to be given to the objections I have identified, I place the greatest emphasis on those interests of acknowledged importance which would suffer permanent and irreparable harm. Foremost among these is the loss of the large and prominent tract of open countryside of considerable landscape quality which contributes significantly to the attractive appearance of the urban fringe on this important approach to Ipswich. This open land also plays a vital role in protecting the separate identity of Sproughton village. The development of some 1,600 houses on the site, however sympathetically designed, would result in irreparable harm to those characteristics on which I place a very high value. The development would also detract markedly from the setting of Red House Farm.

In my judgement, the benefits associated with the proposed development would not compensate for its adverse effects’ (paragraphs 18.26 – 18.27)

The interests and characteristics referred to by the Planning Inspector remain in existence today, largely unchanged. That a proposal to develop land for 1,600 houses plus employment opportunities was found to not provide sufficient public benefit to justify the destruction of those interests and characteristics, clearly demonstrates that a proposal today to develop less than half the quantity of houses whilst still resulting in the loss of ‘*open countryside of considerable landscape quality*’ and detracting ‘*markedly from the setting of Red House Farm*’ is without merit and any approval of such a proposal would be unreasonable. The Application should therefore be rejected.

Adverse Impact on Heritage Assets

Setting

² Alison Farmer is one of the UKs leading professionals in landscape character assessment, impact assessment and landscape evaluation. She is the principal of Alison Farmer Associates (AFA), based in Cambridge and has over 25 years of professional experience.

³ JPC Environmental Services is a division of JP Chick & Partners Ltd <https://www.chick.co.uk/about-us>

Conservation is the process of managing change to a heritage asset in a way that sustains its significance. The significance of a heritage asset is derived not only from its physical presence but also from its setting. National planning policy establishes that setting can both contribute to the significance of a heritage asset, and that it can allow that asset's significance to be appreciated:

'The setting of a heritage asset is the surroundings in which a heritage asset is experienced... Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.' (National Planning Policy Framework ("NPPF") – MHCLG (2019))

Historic England recommends that the significance of a heritage asset and the impact of a proposal on that significance be assessed in stages, addressing first the key attributes of the heritage asset itself, and then considering the physical surroundings of that asset, its intangible associations with its surroundings and patterns of use, and the way views allow the significance of the asset to be appreciated. The final stage provides the baseline for analysis of the impact of proposals on an asset's setting. The HIA which forms part of this objection comprises a comprehensive heritage impact assessment consistent with Historic England's guidance and should be referred to accordingly.

The Applicant's Built Heritage Statement prepared by CgMs and dated April 2021, at section 4.2, states that land beyond the immediate setting of Red House Farm makes only a moderate contribution to its significance because, it asserts, the significance of Red House Farm is '*derived principally from its historic built fabric*' which '*becomes less appreciable as the length of views increases*'.

The view expressed in the Built Heritage Statement stands in stark contrast with the conclusions reached by 3 experts, including the Council's own advisors, Place Services Ltd ("**Place Services**") and Land Use Consultants Ltd ("**LUC**"). Place Services state in their letter of objection to the Application dated 7 June 2021 that the Applicant's '*conclusion that the site makes a 'moderate' contribution to the setting of [Red House Farm] is...underestimated*'.

In their Historic Environment Appraisals prepared for Babergh and Mid Suffolk District Councils (Stage 2 – Heritage Impact Assessments for Preferred Sites) in October 2020 (the "**JLP Appraisal**") LUC state at paragraph 7.43 that:

'... the site is an important part of the setting of Red House as its openness reinforces the presence prominence of the house in the landscape and complements its scenic qualities. This is especially true of those fields north of Hadleigh Road to the west of the house... The lack of visual distractions in the surrounding landscape makes the building's architectural features more legible and ensures its standing in the landscape is not challenged.';

and at paragraph 7.45:

'The sensitivity of the significance of the asset to the development of the site is high. This is because the rural setting of the house makes a considerable contribution to our ability to understand and appreciate the building and changing its use and introducing built development would negate its ability to make this contribution.'

The HIA also found that the landscape setting of Red House Farm was '*highly sensitive to development*' (paragraph 9.02).

Red House Farm comprises two grade II listed buildings; the principal house and its barn. As a farmstead, and as is evident in the photographs in the HIA assessing how views allow the heritage assets to be appreciated, it is clear that Red House Farm is intrinsically connected to its surroundings; it owes its existence to the topography of the land – the plateau farmlands on which animals previously grazed that are now arable farmed and the rolling valley sides which today still cause water to coalesce in the

basin in which the house sits. The landscape surrounding Red House Farm has provided for the farm's occupants for centuries. This fact is illustrated than in the painting of the Red House Barn and its farm yard by British water colour artist Russell Sydney Reeve in 1932, and now housed in the archives of the V&A museum due to its national significance.

(See:<https://collections.vam.ac.uk/item/O122035/red-house-farm-sproughton-near-watercolour-reeve-w-russell/>)

Notably, the farmyard Reeve painted has changed very little – passers-by may stand in the very spot Reeve stood and look into the yard – it remains entirely open facing onto the fields on the south side of the Hadleigh Road.

The same may be said of Reeve's painting of Red House itself (see below). Views of Red House and its rural setting can be experienced now as they were almost 100 years ago.



The approach to the rear of Red House Farm via Church Lane also affords open and unique views of the entire farm complex with both the house and the farm buildings being visible in the same setting, against a backdrop of rolling valley farmlands with the tree line of Chantry Park in the distance (see figs. 55 & 56 of the HIA.) Elements of these views are also visible from the public rights of way that cross the field to the west of Church Lane (see fig. 53 of the HIA).

In sum, Red House Farm has a historic and symbiotic relationship with the broad landscape that surrounds it; it looks out to connect with the landscape and equally, it is a focal point of the landscape. As a farmstead, it explains how the landscape has evolved; equally the landscape and its topography explains the farm's existence. The setting of Red House Farm is thus key to experiencing and appreciating these heritage assets. This is consistent with the views of Michael Collins, LUC and Place Services as set out above.

The Applicant's conclusion with respect to setting however, does not reconcile with these expert conclusions. Narrowly focusing purely on the built form it is neither consistent with the NPPF nor the guidance of Historic England with respect to assessing setting, most notably by failing to adequately consider the physical surroundings of Red House Farm, its intangible associations with its surroundings and patterns of use, and the way the views of the broader landscape allow the significance of the asset to be appreciated

Accordingly, the Applicant has failed to properly identify heritage assets (which includes their setting) which may be impacted by the proposals in the Application as required by paragraph 189 of the NPPF, and must be discounted accordingly.

Harm

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) states that when exercising planning functions, the decision maker must give special regard to the desirability of preserving a listed building and its setting. The NPPF explains that ‘special regard’ means requiring ‘great weight’ to be given to the conservation of designated assets (para. 193) and requiring any harm to have clear and convincing justification (para. 194).

Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Adopted Policy CS15 states that development should respect heritage assets, ensuring that adequate protection, enhancement and compensation is given to distinctive features which characterise the heritage assets of Babergh District.

As has been identified above, the Applicant has reached a flawed conclusion that the landscape surrounding Red House Farm only has a moderate impact on its significance. It therefore follows that its conclusion that any harm that would result to the heritage assets by the development of that landscape is equally flawed. This is clearly illustrated by the disparity with respect to the Applicant’s finding that the Application would result in ‘*a less than substantial degree of harm, at the lower end of the spectrum*’ (paragraph 7.52 of the Planning Statement) whereas; LUC found:

‘In this instance there is little that can be done to avoid all harm if the site is developed because it is the principle changing the use of the land from agricultural to developed that will cause the harm and this cannot be overcome with design.’ (LUC at paragraph 7.48 of the JLP);

and, at paragraph 7.69:

‘Cumulatively, the harm to these assets as a group would be greater than individually but overall the level of effect would remain at medium-high’; and

Place Services’ Built Heritage Advice concluded:

‘If the proposals are permitted, this open context and agricultural setting to the building would be lost, with the listed building and farm complex subsumed into an urban setting. There would therefore be harm to the significance of both listed buildings...within the realms of less than substantial, at the medium to high end of the scale.’ (emphasis added).

As stated above, paragraph 196 of the NPPF requires a development proposal that will lead to less than substantial harm to the significance of a designated heritage asset to be weighed against the public benefits of the proposal. The Applicant has set out benefits which it considers supports the development of the Site on the basis that the Site has little impact on Red House Farm (a ‘*minimal level of harm*’ per paragraph 7.54 of the Planning Statement). Those benefits are set out at section 8.8 of their Planning Statement and in essence comprise little more than the delivery of new homes over a significantly protracted period, plus a school and some highways improvements (in each case necessitated only by the building of new homes).

Given that the level of harm has been identified as being medium to high and thus far more significant than that acknowledged by the applicant (‘*minimal*’), it follows that the purported benefits identified to

offset a minimal level of harm cannot be sufficient, and in fact fall substantially short, against the ‘great weight’ that must be given to the protection of designated assets (and their setting) where the potential for harm is considered by multiple experts to be medium to high.

In the 1988 Appeal, the Appeal Inspector found that the development of 1,600 houses plus employment land was not sufficient justification to cause serious harm to Red House Farm. It is therefore inconceivable that an inconsistent conclusion could be reached with respect to the current Application (see page 2 above). Accordingly the Application should be rejected.

Landscape

Paragraph 170 of the NPPF states that:

‘Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.’

CSA Environmental prepared a Landscape and Visual Impact Assessment as part of the Applicant’s Environmental Statement (Chapter 7). The conclusion of CSA’s assessment was that the Site was of ‘medium landscape quality’ (para 7.183) and that in planting a number of trees and some hedgerows, the impact of development on Chantry Vale would be moderate-slight adverse, and not significant, 15 years post development. They consider that at that point in time there will be ‘no remaining significant environmental visual effects... from public vantage points’ (section 7.34 of the Planning Statement).

We refer to the Landscape Appraisal prepared by Alison Farmer Associates Ltd (“AFA”) in September 2019, and which formed part of our Submission. For the purposes of the Appraisal, AFA considered a number of independent assessments - the Suffolk Landscape Character Assessment, Mid Suffolk and Babergh Landscape Guidelines, the 2018 Settlement Sensitivity Study, the Haven Gateway Green Infrastructure Strategy and the Ipswich Core Strategy – and ultimately concluded at paragraph 3.19 that ‘several independent assessments have articulated the character, value and function of land at Chantry Vale’ (i.e. land comprised within the Site).

AFA’s own review of the landscape concluded that:

‘The geology, drainage and topography have all influenced the siting of farmsteads which took advantage of the folds in landform and natural supply of water e.g. Spring Vale Farm and Red House Farm.

Today the historic elements of the landscape are still legible and influence present day landscape character..... Development beyond the area has, to date, had limited influence on perceptions of the area, which retains a strongly rural character.’ (paras 4.4 – 4.5)

‘The existing character and sensitivity assessment for this area indicate that this landscape is likely to have a weight of evidence that supports its recognition as a valued landscape. The findings of the Landscape and Visual Impact Assessment undertaken for the Wolsey Grange 1 development concur with this.’ (para 4.20)

‘Whilst it is accepted that changes in the vicinity of the site over the last 20-30 years have caused some alteration to the character and qualities of the land... it nonetheless retains a distinctive and intact character which sets it above ordinary countryside. Its association with valued historic assets...coupled with its role in providing a unique and rare setting, approach and gateway to Ipswich, all increase its sensitivity. Furthermore, there is consensus regarding the value of this landscape, which is evident in past planning decisions and appeals...’ (para 4.21)

Following their appraisal of the landscape comprising the Site, AFA considered the impact of the proposals laid out in the Applicant's Vision Document. AFA concluded:

'The development will extend down the valley slopes to around the 18m contour in the northwest and will foreshorten views. The proposed development would therefore fundamentally alter the character of the area. Such changes would not be possible to mitigate, even through landscape planting within the site, as it is the extent of open, rural countryside and vale topography which define the area's distinctiveness. These qualities would be lost and cannot be replaced.' (para 5.7)

AFA also noted the impact of the proposed attenuation basins and road junctions on the landscape, all of which would result in fundamental changes to the topography and the loss of the scale and extent of rural landscape, such that it would feel strongly urbanised. Connecting views to the countryside to the west would also be lost.

'Development would ruin forever the beautiful natural approach to the west of Ipswich' (Babergh District Council, 1987).

CSA's conclusion that the Site is of medium landscape quality and that the impact of development on Chantry Vale, notwithstanding that it would entail a fundamental alteration of the character of the area and ruin forever the beautiful natural approach to the west of Ipswich, is not credible - from either a heritage or landscape perspective - and is inconsistent with the views previously expressed about the landscape by Babergh District Council. It should be discounted accordingly and the Application rejected. To approve the Application would also be inconsistent with paragraph 170 of the NPPF which requires planning decisions to contribute and enhance the natural and local environment, including through the protection and enhancement of valued landscapes.

Flood Risk

As identified by the Applicant in section 6.67 onwards of its Planning Statement, the NPPF focuses on the need to meet the challenge of climate change and flooding. Accordingly, at paragraph 163 it states:

'When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere.'

As has been referred to above, Red House Farm sits in a basin within rolling valley farmlands, at the confluence of water.

It is generally accepted that the proposed development as outlined in the Application would see considerable adjustment to the landscape surrounding Red House Farm.

The Application proposes to control the impact of the changes on the landscape's water flows through the use of attenuation basins.

Taking account of the approved attenuation for Wolsey Grange 1, the Applicant's proposed scheme would see six attenuation basins engineered within the landscape around Red House Farm. All 6 of those basins would be positioned 'uphill' of Red House Farm. Putting aside the appropriateness of engineering the landscape in this way (see the *Landscape* section above), it follows that in the event of any overtopping of any or all of those basins, Red House Farm would sit squarely in the directional flow of the water.

In September 2019, we commissioned the JPC Report. Whilst some details of the Applicant's drainage plans have since changed (specifically the number and size of attenuation basins required due to the

unfeasibility of the original proposals), a number of the issues identified by the JPC Report in respect of the Vision Statement are extant.

We refer to page 2 of the JPC Report:

'Surface water (fluvial) flooding has also been identified as a significant source of flood risk within the Vale. The EA's flood mapping indicates floodwaters may reach a depth of up to 900 mm in places and have a flow rate in excess of 0.25m/s adjacent to Red House. Notable areas of risk are those immediately upstream of the two culverted sections [adjacent to Red House Farm], the waterbody to the rear of Red House and the highways adjacent to Red House. As Red House lies at the confluence of the two land drains it is particularly vulnerable to exceedance flows.'

The Environment Agency's flood mapping referred to in the JPC Report identifies existing areas at risk of flooding on the basis of the current landscape and drainage infrastructure. Any increase in water flows – including from development - increases that risk. Equally, any failure in the drainage infrastructure increases that risk.

The Applicant's proposals depend entirely upon attenuation successfully mimicking the existing green field run off rates; on the assumption that attenuation will be successful they then seek to make use of the current drainage infrastructure with minimal to no enhancement. The drainage infrastructure in question comprises the land drains for the fields to the south and west of Red House Farm, which currently feed into a single culvert which crosses west to east (in a 300mm pipe) under Church Lane and the rear garden of Red House Farm before feeding into a further land drain on the north-east boundary of the farmstead. A CCTV survey of the drainage arrangements undertaken in 2019 found that:

'...the existing infrastructure is in a relatively poor condition due to its age and may not be capable of supporting existing flows or much less increases in the future' (page 3 of the JPC Report).

The condition of the pipe as noted by the 2019 CCTV survey is not surprising; it has not been maintained for a significant period of time (at least for the duration of our occupancy of Red House Farm) and indeed, is likely beyond repair due to the significant specimen Spruce tree (of some 200+ ft) which sits on top of it.

It should also be noted that the pipe crossing Red House Farm was put in place by East Suffolk County Council pursuant to a licence dated 7 November 1946, granted by the then owner of Red House (and enuring for the grantor's successors in title). The stated purpose of the pipe was for the discharge of surface water from Church Lane. The licence may be terminated on the giving of 3 months' notice. The Application is largely silent on the infrastructure downstream of the attenuation basins.

In summary, the Applicant's proposals change the landscape and its water flows; they propose to address this through cutting and filling the landscape to create 5 further attenuation basins to hold back the water. The basins will be located directly uphill and in the setting of Red House Farm (comprising two designated heritage assets) and the natural basin in which it sits, which the Environment Agency has already identified as being an area at risk of pluvial flooding. The proposals then rely upon an aged field drain and culvert arrangement, which was put in place for a limited purpose, has not been maintained, may not be capable of even dealing with current water levels, and which is capable of being terminated on 3 months' notice – to ultimately deal with discharge surface water to the Gipping. The surface water in question is not just the surface water from Church Lane (which would align with the purpose of the licence), it is the surface water from the entirety of the Site, and Wolsey Grange 1.

Unequivocally, the Applicant's proposals increase the risk of flooding, and consequently increase the

risk of substantial harm to heritage assets. The Application should be rejected accordingly.

Further issues arising from the Application

There are a number of other aspects of the Application to which we object. In addition to the points set out above, we consider they preclude the ability of the Applicant more generally to deliver the proposals set out in its Application. Specifically:

Views

Contrary to comments concerning views from Red House Farm in some of the reports accompanying the Application (the basis for which is not clear given the authors have never visited or requested to visit the house) Red House has an open perspective. Immediately in front of the house it first appears that the house is largely screened from pedestrian and vehicular travel, albeit the house can be seen through breaks in the tree line – most notably down its drives. However, every window of the house, from ground to second floor, has some perspective of the surrounding landscape – and can equally be seen. Indeed, a majority of the windows at first and second floor (facing in all directions) have panoramic views:



Figure 1: Photo from a second floor bedroom window illustrating views of the Site to the SW

In addition, due to the rising topography which sees the land immediately to the west of Church Lane sit higher than the house (the ground level sits above the 2.5m high garden wall which abuts the western end of the house and continues to incline – see the photos below), the front and rear of the house and garden are visible from the land to the west.



Figure 2: View across the front of the house showing land (rising) immediately to the west.



Figure 3: View from the rear of the house showing land (rising) immediately to the west

The Application proposes housing heights of 2 to 2.5 storeys (9-9.5m) on that section of the site which sits to the west of Church Lane. That is the same height as Red House. The effect of housing of that

scale would be to significantly overlook all aspects of the House and dwarf its presence in the landscape. We have already addressed the fact that development of the landscape surrounding Red House Farm would destroy its setting thereby causing Red House and Red House Barn substantial harm. To create a built backdrop of such a scale would further compound that harm.

Moreover, it is unequivocal that the degree of intrusion posed by houses of the stated height on the views from and into the farmstead would give rise to a need to establish a tall and robust green planting screen to ensure the privacy and enjoyment of Red House Farm by its occupants. The effect of that would be to remove Red House Farm almost entirely from public view with limited exception. That is not a desirable result given the prominence of Red House Farm in the landscape and serves to underscore that development of the site is inappropriate. We note that this conclusion accords with the views of a number of the reports referred to in this objection as referred to above.

Skylark mitigation

The Application identifies land beyond the site as being key to its proposals, notwithstanding that it does not form part of the Application. Specifically, the fields immediately to the north and east of Red House Farm have been identified for wildflower meadow and skylark mitigation as part of the ‘green corridor’ running south to north through the landscape. This is because those fields are subject to a restrictive covenant, which significantly limits how they may be used; they may not, for example, be used for public amenity purposes (the ‘Covenant Land’).

Whilst we are supportive of using land in a way that encourages biodiversity, the Covenant Land does not lend itself to skylark mitigation.

The fields to the west of Church Lane currently host the Combined Skylark Mitigation Scheme for Chilton Leys in Stowmarket and Wolsey Grange, housing some 28 skylark plots. Key features of the existing site which make it suitable for mitigation, as set out in the Combined Skylark Mitigation Scheme prepared for the applicant by CSA Environmental in April 2017, include its size (10.5 ha.), its arable nature, open-domed profile and lack of dense tree planting / woodland. In the event of development of the Site the mitigation scheme would need to be relocated hence the proposal with respect to the Covenant Land. Aside from the significant difference in size between the existing and proposed mitigation sites, which would see a marked reduction in the number of skylark plots (c.50%), we note the inappropriate character of the Covenant Land as compared with the existing site and the RSPB guidelines.

The RSPB guidelines provide that fields used for skylark mitigation should be more than 5 hectares in size and that fields *‘bounded by trees or adjacent woods are not suitable unless they are larger than 10 ha’*. The fields comprising the Covenant Land are significantly less than 10 ha. and are bounded by trees over which the Applicant has no control. They are also bisected by a row of White Willow trees. In short, the Covenant Land fails to meet the minimum requirements for a skylark mitigation scheme and is not appropriate for skylark mitigation regardless of the existence of development proposals.

Road Infrastructure

Hadleigh Road is used as a route into Ipswich from the west. The effect of this is that it is busy during weekday peak periods. However, outside of those hours, the stretch from Chantry Park to the junction with the A1071 is remarkably quiet and, as was noted by AFA in their report, the vale is relatively tranquil, retaining its rural character (paragraph 4.6). The adjoining Church Lane, which provides access to many of the public rights of way across the vale and via the Churchman Way to Chantry Park, is earmarked for ‘quiet lane’ designation. Living at the western end of the Hadleigh Road is like living in the countryside; regardless of planning designation, it does not feel urban. Moreover, it provides an important gateway to the broader countryside to the west. Therein lies the particular appeal for its

residents – and indeed for those that use it.

Unlike suburban roads, the western end of Hadleigh Road follows the land's topography. It is winding, extremely narrow in places (large vehicles struggle to pass each other) and the pavement, which exists at stretches only on the northern side of the road, is also extremely narrow (almost non-existent in places). It is not a road which can accommodate significant volumes of traffic – vehicular or foot traffic - and nor would it be safe to do so.

The Application would see the creation of 750 new homes plus a school, and the addition of 2 new junctions plus a roundabout on a stretch of road not much longer than a mile. Road widening would be required, new footpaths would need to be created and existing footpaths widened – where possible to do so (we note the land along much of the road frontage on the northern edge and some of the southern edge of the road is subject to a restrictive covenant with respect to development).

The traffic resulting from the development would have a considerable impact on existing residents. The tranquil nature of the road and the amenity value it offers would be lost. Those houses closest to the road would suffer increased vibration, noise and a reduction in air quality. Accessibility for residents would be further reduced during peak hours; pulling in and out of drives and the roads leading off of the Hadleigh Road would be ever more challenging during peak traffic times – and those periods would likely become protracted with the increase in volume and the queues that would result from the multiple junctions. Beyond the Hadleigh Road, with the development of 475 houses at Wolsey Grange 1 already underway, significantly more traffic will be put onto the A1071 and the A1214, exacerbating the existing congestion issues experienced on those roads and the Copdock Interchange.

Duration of development

The Application is for c.750 houses to be built over 10 years commencing in 2026; that is 75 houses per year. Such a timespan does not accord with the notion of an 'urgent need for housing'. It amplifies the lack of a clear and convincing justification for development within the setting of heritage assets and also fails to justify the destruction of a valued landscape. Moreover, it would be unreasonable and an infringement of the personal rights of those who live in this locality to subject them to 10 years of development and the noise, traffic, dirt and unsightliness that would be associated with it. 10 years of development that would follow on from the noise and inconvenience of the development of Wolsey Grange 1. In short, it would comprise nuisance and potentially be subject to challenge.

Conclusion

For the reasons set out above, the Application is fundamentally flawed and we strongly object to it. We would urge its rejection and the consideration of the many alternative sites across Babergh District for the purposes of meeting existing and future housing needs.

Yours faithfully,

David & Annette Brennand

BABERGH & MID SUFFOLK JOINT LOCAL PLAN

COMMENT FORM



22nd July to 30th September 2019

Before completing this comment form please note that:

All valid comments (electronic or written) and your/your organisation's name will be made publically available on the Councils' website. **Personal contact details will remain confidential** and will be used solely by the Strategic Planning team for the purposes of the production of the Joint Local Plan and other policy documents. By completing this form you are consenting to your personal information being used for this purpose.

Comments should only relate to the consultation on the Babergh and Mid Suffolk Joint Local Plan: Preferred Options Document (July 2019). Paper copies of the consultation documents are available at the Councils' Office and at libraries within the Districts, or online at the Councils' website links below:

www.babergh.gov.uk/jointlocalplan
www.midsuffolk.gov.uk/jointlocalplan

Please complete all sections of this form fully and clearly. However, you do not need to respond to every section in the Preferred Options Document.

Comments should be made on the forms provided or made via our online consultation system at www.babergh.gov.uk/jointlocalplan and www.midsuffolk.gov.uk/jointlocalplan. Electronic copies can be downloaded from these links and paper copies of the forms are available at the Councils' Office and at libraries within the Districts.

Completed forms should be emailed to localplan@baberghmidsuffolk.gov.uk or posted to Strategic Planning Policy, Babergh and Mid Suffolk District Councils, Endeavour House, Russell Road, Ipswich, Suffolk IP1 2BX. If you wish to deliver your comments in person please telephone us on 0300 123 4000 (please select option 5, then option 4).

All comments must be received by no later than 4pm on 30th September 2019.

Section One: Respondents Details

All respondents should complete Part A. If you are an Agent please complete Parts A & B

Part A: Respondent	
Title / Name:	Ben Elvin
Job Title (if applicable):	
Organisation / Company (if applicable):	Ben Elvin Planning Consultancy Limited
Address:	122 Constable Road, Ipswich, Suffolk
Postcode:	IP4 2XA
Tel No:	[REDACTED]
E-mail:	[REDACTED]

Part B: Agents – Please complete details of the client / company you represent	
Client / Company Name:	Dr and Mrs D Brennand
Address:	Red House, Hadleigh Road, Sproughton, Ipswich, Suffolk
Postcode:	IP8 3AT
Tel No:	
E-mail:	[REDACTED]

I understand that my response(s) will be considered by the Councils in preparing the Joint Local Plan document, and that my comments will be made publicly available and identifiable to my name and/or organisation. The information in this form is, to the best of my knowledge, correct.

Signed: [REDACTED]	Dated: 27.09.2019
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Section Two: Your Representation

For Official use only::

JOINT LOCAL PLAN CONSULTATION JULY 2019

Date Acknowledged:

Reference:

Please indicate what part of the document you are commenting upon and use one box per comment. If your comment is more than 100 words please provide a summary.

Respondent	
Name / Organisation:	Ben Elvin on Behalf of Dr and Mrs D Brennand

Please be specific what document / part your comment below relates to:				
Document:	Joint Local Plan Preferred Options Document <i>(mark 'x')</i>	X	Section / option / question / site	LA013 – Land North of A1071 - Sproughton
	Sustainability Appraisal <i>(mark 'x')</i>			

Please indicate the nature of your comment: *(mark 'x')*

<input type="checkbox"/>	Support	<input checked="" type="checkbox"/>	Object	<input type="checkbox"/>	Comment
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Please enter your comment below:

(Continue on a separate sheet if necessary)

Please see attached letter and appendices setting out my clients' objections.

Please enter a summary below if your comment is more than 100 words:

The proposed allocation gives rise to significant harm to a valued landscape, causes unjustified and unnecessary harm to heritage assets, would give rise to drainage and flooding issues and is undeliverable.

Respondent	
Name / Organisation:	

Please be specific what document / part your comment below relates to:				
Document:	Joint Local Plan Preferred Options Document <i>(mark 'x')</i>		Section / option / question / site	
	Sustainability Appraisal <i>(mark 'x')</i>			

Please indicate the nature of your comment: *(mark 'x')*

Support

Object

Comment

Please enter your comment below:

(Continue on a separate sheet if necessary)

Please enter a summary below if your comment is more than 100 words:

**PLEASE ENSURE YOU HAVE READ AND SIGNED THE DECLARATION
ON THE RESPONDENT DETAILS PAGE EARLIER**

Thank you for taking the time to comment



Strategic Planning Policy
Babergh and Mid Suffolk District Councils
Endeavour House
Russell Road
Ipswich
Suffolk
IP1 2BX

By email to: localplan@baberghmidsuffolk.gov.uk

27th September 2019

Dear Sirs

BABERGH AND MID SUFFOLK JOINT LOCAL PLAN – PREFERRED OPTIONS (REGULATION 18)
CONSULTATION - PROPOSED ALLOCATION LA013 – LAND NORTH OF THE A1071, SPROUGHTON

I am instructed by Dr and Mrs D Brennand of Red House, Hadleigh Rd, Sproughton to raise objection to the proposed allocation LA013 – Land North of the A1071, Sproughton.

It is understood that a planning application is currently being prepared by Taylor Wimpey for submission relating to a differing (smaller) number of dwellings on this land. This response does not deal directly with that proposal, but will refer to it where relevant.

Background and Planning History

In 1986, an application was submitted to Babergh District Council for outline planning permission for a mixed development including “Residential, Public Park, Shops, Public House, Medical Centre, Supermarket, Exhibition Centre, Hi-Tec Business Park and Construction of New Roads and Alteration to Existing Roads” on land described as “Land between A45 by-pass and Chantry Park, Sproughton”.

The site extended to 72 ha (178a) and included the land parcels that are now identified as proposed allocations LA013 and LA014. The application was given reference B/1144/86.

The planning application was refused in May 1987 for six reasons. A copy of the decision notice is appended to this letter as Appendix 1.

An appeal was lodged in respect of this application and this was the subject of a public inquiry running across 10 days in October 1987 and 4 days in November 1987. The inquiry also considered an appeal relative to land south of Belstead Brook, which was 'coupled' to the Chantry Vale appeal insofar as it considered development of the Ipswich Fringe and required comprehensive consideration.

In early 1988, the Inspector concluded that the appeals should be dismissed.

The Inspector's reasoning remains as pertinent to this day as it did in 1987. Reference is made, therefore, to the conclusions made by the Inspector at the relevant parts of this submission. These conclusions are supported by site-specific evidence provided by my clients which demonstrates, beyond any reasonable doubt, that the proposed allocation is flawed, undeliverable and unsound.

Their reasons for concluding thus are set out below.

Landscape Impacts

My clients raise significant concerns with the potential landscape impacts of a development of the scale proposed on this land.

The proposed allocation policy LA013 identifies, at criterion ii), that;

"ii. Landscaping will be included to reflect the sensitivity of the landscape the area"

The Council clearly, therefore, recognise the sensitivity of the landscape in this location. Indeed, the emphasis given to it within this policy does not exist in other proposed allocations/policies within the emerging plan, where there is no reference to the 'sensitivity' of the landscape (even in numerous AONB locations). It is presumed that this reference results from the Council's own Settlement

Sensitivity Assessment that forms part of the evidence base informing the Joint Local Plan. This is commented on further shortly.

The Inspector in the 1987 Public Inquiry confirmed the sensitivity of this landscape. Indeed, the Inspector found that this was so sensitive such that the proposed development would be inherently harmful and could not be justified. The following extracts from the Inspector's decision clearly demonstrate this;

"18.13. The Chantry Vale appeal site comprises a substantial area of attractive, open rolling farmland between the by-pass and the existing urban edge of Ipswich. Its topography makes it prominent to view and its landscape features make a significant contribution to the attractive approach to Ipswich from the west. It also affords attractive views from other roads and footpaths which surround and cross the site.

18.14. Much of this scenic quality is due to the notable tree screen which borders the eastern side of the site. The general effect is of open countryside extending unbroken across the site and up to the very edge of the town, which is scarcely apparent behind the trees. The sugar beet factory, though unsightly itself, is seen as a relatively minor feature in terms of the large scale, long distance views".

18.15. The proposed development would extend housing beyond the wooded perimeter of the town into the open countryside. Housing would cover the slopes rising from the Gipping Valley which are exposed to view. Landscaping would not compensate for the loss of the fine views which are now enjoyed into and across the site. The setting of the listed buildings at Red House Farm would be seriously harmed.

18.16 The site also fulfils the valuable function of separating the village of Sproughton from the main built-up area of the town. The feeling of remoteness is helped by the strong tree screen which hides the presence of the town to the east".

"18.18 The existing edge of the town is well defined by the strong line of trees along the eastern site boundary, and there seems to be no justification for extending the urban area out to the line of the by-pass. In my judgement, these represent strong and clear-cut objections to the proposed development".

“18.26 In assessing the weight to be given to the objections I have identified, I place the greatest emphasis on those interests of acknowledged importance which would suffer permanent and irreparable harm. Foremost among these is the loss of the large and prominent tract of open countryside of considerable landscape quality which contributes significantly to the attractive appearance of the urban fringe on this important approach to Ipswich. This open land also plays a vital role in protecting the separate identity of Sproughton village. The development of some 1,600 houses on the site, however sympathetically designed, would result in irreparable harm to those characteristics on which I place a very high value. The development would also detract markedly from the setting of Red House Farm.

18.27 In my judgement, the benefits associated with the proposed development would not compensate for its adverse effects”.

“18.47 In my view the grant of permission would only be justified by a very strong and urgent need to release more housing land. In this case, there is an identified need to find sites for 1,000 houses to be built. There is also sufficient doubt as to whether an adequate five-year supply of housing land exists to justify the added presumption in favour of granting permission. Nevertheless, in spite of this, I do not consider that the degree of urgency justifies the grant of planning permission to objectionable development while there is still the possibility of finding a more acceptable solution through a comprehensive study of all possible options. My recommendation is based on this reasoning”.

Furthermore, the Inspector also considered (in the event that either of the developments before him could be justified at all) that the land south of Belstead Brook represented the least harmful option available at that time. The Inspector considered that the harm to the landscape that would result at Chantry Vale would outweigh the highway safety aspects resulting from the Belstead Brook site. Put simply, the harm at Chantry Vale was considered to be so significant that a proposal that would have resulted in significant highway detriment elsewhere was still preferred. This demonstrates the need to carry out a full and robust assessment of alternative sites when considering the delivery of new development on the entirety of the Ipswich Fringe. My clients consider that such a robust assessment has occurred in respect of the emerging local plan.

The Inspector’s views on the sensitivity of this landscape are reinforced by a Landscape Appraisal by Alison Farmer Associates Ltd (AFA), commissioned by my clients and completed in September 2019

(Appendix 2 to this letter). It should be noted that AFA carried out the Settlement Sensitivity Assessment on behalf of a number of local authorities (including Babergh DC) in July 2018 which, as aforementioned, forms part of the evidence base upon which the Council's emerging plan is based. Their credentials, knowledge and relevance to assessing the landscape character of this parcel of land cannot, therefore, be at question.

The Landscape Appraisal identifies that the LA013 site is likely to constitute a valued landscape in the terms expressed by paragraph 170 of the NPPF. As such, any policy should be promoted with the aim of "protecting and enhancing valued landscapes". Policy LA013 clearly does not do this. It promotes the development of highly sensitive and prominent land that forms valued landscape and which has previously been found to require the highest level of protection. Indeed, the Council's Settlement Sensitivity Assessment found that;

Ipswich has, in places, extended beyond the Gipping Valley and head of the Estuary into adjoining landscapes, and in many respects has exceeded its natural landscape limits. This study has demonstrated that the river valleys that lie adjacent to Ipswich play an important role as recreational and ecological corridors, and as a setting to the town and smaller settlements. Higher ridges which remain undeveloped help to contain the river valleys and settlements beyond. These ridges are highly sensitivity to development.

Similarly some of the smaller rural settlements have been found to be highly sensitive to change in part due to their historic character and high quality landscape settings e.g. the rural villages of the Fynn and Lark Valleys.

Nevertheless, this sensitivity assessment has identified areas of lesser landscape and visual sensitivity which may be able to accommodate discrete well thought out development on the fringes of some of the settlements within the study area.

The LA013 land is recognised as one of the areas that was found to be highly sensitive to development. There are, as identified by the Council's own evidence base, areas that are of lesser landscape and visual sensitivity which may be able to accommodate new development. A number of these lie within the Babergh and Mid Suffolk districts. Development of this scale in this location is not, therefore, based on a robust assessment of alternative sites and flies in the face of the Council's own sensitivity appraisal. It is, thereby, promoted on a flawed premise that is contradicted by the Council's own evidence.

Furthermore, the Landscape Appraisal draws attention to the conflict with proposed policy LP18. Given that the LA013 policy includes a criterion which requires accordance with "1.) The relevant

policies set out in the Joint Local Plan”, there is clear and recognisable conflict with the proposed allocation and other policies in the emerging plan. The plan is, therefore, self-contradicting and policy LA013 fails to meet a number of the tests imposed by its own content.

Given that the appeal Inspector found this area of land to be a “large and prominent tract of open countryside of considerable landscape quality which contributes significantly to the attractive appearance of the urban fringe on this important approach to Ipswich” and that “This open land also plays a vital role in protecting the separate identity of Sproughton village” whereby it’s development would “result in irreparable harm to those characteristics on which I place a very high value” and “also detract markedly from the setting of Red House Farm”, it is abundantly clear that the proposed allocation of this land is flawed as a matter of principle. The landscape impacts simply cannot be mitigated to an acceptable extent such as to overcome the significant harm to this valued landscape.

The proposed allocation does not, therefore, comply with the provisions of the NPPF in terms of the resultant landscape impacts. The Council have failed to demonstrate why the loss of valued landscape is necessary when other alternatives exist, and have sought to promote development of this land in the clear knowledge that the impacts of such development cannot be suitably mitigated.

Heritage Impacts

Chapter 16 of the National Planning Policy Framework addresses the conservation and enhancement of the historic environment. It recognises that heritage assets “are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations” (paragraph 184) and confirms through footnote 62 that “The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making”. As such, the same principles which relate to the decision making processes in which the Council are well-versed apply equally to the plan-making role that the Council is taking in this instance.

Of particular interest, the Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment (March 2018) does not address this area at all. The introduction to this document, which is published as part of the Evidence Base supporting the Local Plan, states;

“The Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk District Councils will provide part of the evidence base for a new Joint Local Plan and to inform Strategic Site Allocations for the Districts. The assessment ensures that the local planning authorities have up-to-date evidence about the historic environment in their districts, including an understanding of the significance of heritage assets. It also ensures that an assessment of the historic landscape is integrated within the council's existing assessments of landscape character and wider evidence base. This will help Babergh and Mid Suffolk District Councils to meet the requirement of the NPPF to 'set out a positive strategy for the conservation and enjoyment of the historic environment' within their Local Plans (para 126), and will help ensure that their future site allocations are found sound”.

It is wholly unclear how the largest allocation in the Babergh district, on land which the Planning Inspector found to be highly sensitive and which would affect the setting of prominent heritage assets on the edge of Ipswich, could be considered to be ‘sound’ when the evidence supporting it does not even assess the allocation in the same way as numerous smaller allocations have been. Whilst it is recognised that the Sustainability Appraisal identified ‘no harm to the significance of a heritage asset or that mitigation of any potential harm was possible’ by suggesting a positive heritage outcome, it is unclear how this conclusion has been reached. Coupled with the absence of any reference to heritage assets in the Taylor Wimpey Vision Document (2017) pertaining to the development vision for this land, it is suggested that the Council have failed to demonstrate a robust consideration of this site in terms of its heritage sensitivity, despite legislative and policy requirements to do so.

My clients have commissioned a Heritage Impact Assessment (HIA) by Michael Collins, Listed Building Planning Consultant. The HIA is appended to this letter as Appendix 3.

The HIA concludes that;

“The proposed land allocation would result in harm to the significance of the identified designated heritage assets at Red House Farm (HIA1) and Chantry Park (HIA2). The Red House Farm comprises a pair of listed buildings (the former farmhouse and its barn), whilst Chantry Park is both a registered park and garden and a conservation area. Great weight should be given to the conservation of a designated heritage asset when considering the impact of a proposal on its significance. In the context of the 1988 appeal decision, which concluded that the benefits of delivering 1,600 houses did not

outweigh the identified harm, the Council should amend the proposed land allocation to restrict residential development to the area of plateau that abuts the London Road and should consider alternative sites in order to deliver the proposed quantum of housing”.

As noted, and mirroring the conclusions reached in the Landscape Appraisal by AFA, the HIA recognises that there are areas of the LA013 site that can be considered to be less sensitive and could, therefore accommodate some development. The HIA is not, therefore, written in a manner to preclude development as a matter of principle, and provides a considered and evidenced appraisal of the potential impacts that makes the absence of such evidence from the Council’s published documents prominent.

The HIA finds, however, that the proposed allocation as currently presented would result in an adverse impact upon the setting of the (Red House) farmstead and would seriously affect a key element of its special architectural or historic interest. The proposed allocation cannot, therefore, demonstrate that the significance of heritage assets has been properly addressed. My clients’ property would be significantly harmed by the proposed development, and there is no scope to successfully mitigate this harm.

Drainage

Appended to this letter, as Appendix 4, is a letter from JPC Environmental Services dated 9th July 2019. The JPC letter provides an assessment of the hydraulic context of the land and identifies a number of areas of conflict/concern with drainage and flood risk that are of significant concern to my clients relative to the proposed allocation LA013.

Attention is drawn to a number of key points raised by this letter, most notably (emphasis added);

“As the Chantry Vale catchment comprises a large percentage of the contributing area to the Gipping at this point, any changes to the local hydrology have the potential to cause a significant adverse impact on the extent of the flood zones downstream”

“Surface water (pluvial) flooding has also been identified as a significant source of flood risk within the Vale. The EA’s flood mapping indicates floodwaters may reach a depth of up to 900mm in places and

have a flow rate in excess of 0.25 m/s adjacent to Red House. Notable areas at risk are those immediately upstream of the two culverted sections, the waterbody to the rear of Red House and the highways adjacent Red House. As Red House lies at the confluence of the two land drains it is particularly vulnerable to exceedance flows”

“.....flooding suggests the presence of a blockage between points C and D, preventing water from travelling through the culvert. We understand from anecdotal evidence that parts of this culvert have been repaired in the past, following previous incidents of flooding”

“Large scale alterations to the valley will cause significant changes to the movement of surface water throughout the landscape”

“Restricting these discharges to a few much larger points of discharge, for example following attenuation, has the potential to increase the risk of scour/erosion within the watercourse(s) as in many areas they are steep and narrow”

“Planning policy requires developers to mitigate this by intercepting and retaining the first 5mm of rainfall. Given the cohesive nature of the underlying geological deposits locally, this may prove very difficult to achieve”

“Following the development of a site surface water runoff should be reduced to mimic the greenfield scenario both in terms of volume and discharge rate. Preliminary calculations suggest that this would require in the order of 25,000 to 30,000 cubic meters of storage. This estimation is based on 600 proposed dwellings as indicated by the “Wolsey Grange 2 - Vision Document””.

“Any increase in the housing density/number of dwellings proposed would result in an increase in the required storage volume”

“On reasonably flat sites this storage can be provided fairly easily and can add wider ecological benefits however in this case, the sides of the valley are steep in places and above ground storage of surface water will require significant quantities of cut and fill to create the required contours/storage areas. The risk of storing large water quantities in this way, as shown within the developer’s ‘design rationale’ section has the potential to significantly increase the risk of “flooding from artificial sources” to properties downstream”

“Unless runoff from the proposed development is restricted to greenfield rates or better, low frequency rainfall events/intense storms are likely to result in surcharging. The anticipated effects of climate change on rainfall will only exacerbate this risk”

Attention is also drawn to page 50 of the HIA, which includes a section drawing of one of the attenuation basins based both upon the existing topography and on the siting and extent of the residential areas and attenuation basins as shown on the indicative layout for ‘Wolsey Grange 2’. It should be noted that this section drawing is based upon a proposal for 600 dwellings, whereas the allocation seeks to promote 1100 properties here. Therefore, in accordance with the JPC comments, there would be vastly more capacity required than that modelled in the sectional drawing shown in the HIA.

As can be seen, even with attenuation provision relative to a scheme of 600 dwellings, the impacts of those works is significant. They would affect the landscape, landform and heritage in visual terms, as well as requiring significant engineering to make them suitable and safe. The risks to my clients’ property are easy to recognise, with that attenuation basin lying immediately upgradient of Red House such that any overtopping would potentially flow towards the property. The basin would require a ‘cliff face’ of approximately 12m in depth, which is clearly not feasible. The cross section demonstrates that this location is a poor choice for an attenuation basin of this size.

That said, there are five more basins indicated on the WG2 plan. It is wholly unclear where attenuation basins to accommodate 1100 homes would be delivered, given the topography of the land, existing flooding issues and the landscape and heritage constraints already identified. It is my clients’ view that the scale of development proposed within the LA013 allocation is simply not achievable. There are simply too many constraints and issues that counteract and compete to make such a quantum of development entirely undeliverable.

My clients consider it likely that any large-scale development of the valley will cause a detrimental impact on the natural movement of surface water, the watercourses which convey runoff through the valley and the level of flood risk to properties downstream. They have sought expert opinion on this subject that has confirmed that there are significant risks associated with such an extensive

development in this location, and it is wholly inappropriate to allocate this land for development without confidence that this risk can be mitigated.

Deliverability

Chapter 3 of the NPPF addresses the matter of Plan-Making. Paragraph 16 identifies that “Plans should;b) be prepared positively, in a way that is aspirational but deliverable.....c) be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees”.

My clients do not consider that the plan is deliverable. It is clear that the Council’s distribution of new homes across the period 2018-2036, as set out in the plan, is heavily reliant on the delivery of 1100 homes on this land. In itself, this allocation provides for approximately 12% of the entire proposed delivery in the Babergh District.

Following their attendance at the Taylor Wimpey presentation evening on 17th September 2019, my clients are aware that the proposals being presented by Taylor Wimpey do not align with the allocation. A significantly reduced number of dwellings are being proposed relative to what the allocation identifies, which raises questions as to the understanding between the LPA and Taylor Wimpey as to the effects of the proposed development and the delivery of the plan.

Indeed, questions are raised as to the issue of prematurity. The NPPF identifies that “arguments that an application is premature are unlikely to justify a refusal of planning permission other than in the limited circumstances where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and
- b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area”.

However, in the circumstance where the proposed development seeks to deliver vastly less development than that which the plan seeks to allocate, there is clearly a fundamental disjunct

between the proposal and the planned allocation. The plan relies on the delivery of 1100 dwellings on this site, having stepped away from the delivery of ‘contingency sites’ as the preferred option in the Issues and Options consultation carried out in the autumn of 2017, whereby a reduction of the number of properties being proposed (which it is understood to be in the region of 400 dwellings) is so fundamental to the plan making process that it would result in the need for additional sites to be found. Indeed, it is akin to the loss of a whole year’s worth of housing delivery based on the evidence provided in the table on page 24 of the emerging plan, as replicated below.

Local Authority	Standard Method Total (2018 – 2036)	Annual Local Housing Need Target
Babergh	7,560	420
Mid Suffolk	10,008	556
<i>Ipswich Housing Market Area Total</i>	35,334	1,963

My clients consider that the recognition by the developer that the site cannot accommodate the delivery of the quantum of housing set out in the plan gives credence to their concerns as to the impacts of the proposed development and the physical constraints upon it. Whilst my clients clearly do not suggest that the site/land can accommodate the number of units proposed by Taylor Wimpey, it is supportive of their case that a major housebuilder such as this is not seeking to create the amount of development that the Council consider can be provided. It is suggested that perhaps Taylor Wimpey’s own investigations of the capacity of the site have highlighted that trying to deliver the proposed allocation numbers would be highly undesirable given the sensitivity of this site to development of this scale, and the failure by the Council to properly assess the constraints of this site as shown within the submitted Landscape Appraisal and HIA.

Whatever the reason, the disconnect between the proposed allocation and the imminent planning application demonstrates that the proposed allocation is significantly flawed. The effect of this flaw, given the fundamental importance of delivery of this proposal to housing delivery in Babergh, demonstrates that the proposed allocation is not sound.

Summary of Objections

Dr and Mrs Brennand have set out clear and evidenced reasoning as to why the proposed allocation LA013 promotes the development of land that is a valued landscape and which sits in a historically sensitive location.

They have supported their objections with a Landscape Assessment by Alison Farmer Associates, who produced the Settlement Sensitivity Assessment that the Council has published in their package of documents that has led to the production of the Preferred Options (Reg 18) plan. The Landscape assessment sets out why large areas of the proposed allocation site is highly sensitive to new development and recommends development of only part of the allocated land. It also identifies direct conflict with emerging policy LP18, and thereby demonstrates that the allocation is not consistent with the Council's own aims set out through their specific policies in the emerging plan.

Dr and Mrs Brennand draw specific attention to the findings of the Landscape Appraisal at paragraph 6.5, which states;

“Even if development could be accommodated on the valley sides through mitigation (which is questionable) no amount of mitigation planting would address the fundamental change to the rural character of the valley landscape which forms the setting and context to Red House and more broadly to the southwest fringes of Ipswich”.

The Landscape Assessment supports the position taken by Babergh District Council in the 1987 Public Inquiry, where the Council were steadfast in their belief that this land should not be developed, that the landscape here was highly important and that it would adversely affect important views and vistas on this approach to Ipswich. That position has not changed. There are more suitable, vastly less sensitive, sites identified in the Council's own Settlement Sensitivity Assessment that could accommodate housing without the need to develop this land.

Furthermore, the Council's Heritage and Settlement Sensitivity Assessment does not consider this land at all, and there is a lack of evidence as to how the Council have reached the conclusion (set out in the Sustainability Appraisal) that the proposal would give rise to positive impacts in this regard. The submitted HIA demonstrates why the majority of the LA013 land would result in significant adverse

impacts on heritage assets adjacent to the land. The impacts upon Red House Farm and Chantry Park were considered in the 1987 Public Inquiry where, in accumulation with the landscape impacts, the benefits resulting from 1600 homes was not found to outweigh the harm. The plan-making process requires the same approach to protecting and enhancing heritage assets as is operated through the decision making process, and the absence of evidence in the Council's documentation is both alarming and flawed.

Furthermore, my clients have evidenced the extent to which drainage proposals for a development of this nature are not deliverable. The extent of work required to deliver the necessary attenuation (albeit that it is evidenced that such attenuation is highly unlikely to be deliverable) would give rise to vast areas of cut and fill that, in itself, would significantly and adversely harm this valued landscape and the heritage assets that lie within it.

The significant doubt that exists as to the deliverability of an allocation of 1100 dwellings on this land is borne out by Taylor Wimpey's recent public exhibition. The developer is promoting a proposal of 700 properties, equivalent to 63% of what the Council is seeking to deliver here. There is a significant, and now public, disconnect between what the Council are seeking to achieve and what the developer considers can be delivered. My clients do not need to speculate as to why this may be, the simple fact that there is such a variance makes the proposed allocation flawed.

For all of these reasons, my clients consider that there are clear and recognisable flaws in the Council's evidence base, that there is no sound reason to step away from the position taken by the Planning Inspector who previously considered this land should not be developed and that they have presented to the Council evidence from expert sources that demonstrates why the proposed allocation is unsound. Further, as the allocation is suggested by the Council to form such a significant part of the Council's housing delivery over the plan period, it thereby follows that the plan is based on an unsound principle and should not be taken forward in its current form.

Yours sincerely

Ben Elvin MSc MRTPI

Ben Elvin Planning Consultancy

Enc.

Cc: Dr and Mrs Brennand
Gemma Walker, Area Team Leader, Babergh District Council
Michael Collins, Listed Building Planning Consultant
Alison Farmer, Alison Farmer Associates
Hannah Purkis, JPC Environmental Services
Alistair Davidson, Roger Balmer Design
Clare Campbell, Historic England
Margie Hoffnung, The Gardens Trust
Fiona Cairns, Suffolk Preservation Society
Mike Taylor, Ipswich Borough Council
Abby Antrobus, Suffolk County Council
Nicolas Page, ECC Place Services

Reg II

Babergh
District Council
South Suffolk

Council Offices
Corks Lane
HADLEIGH
Ipswich
IP7 6SJ

Town and Country Planning Act 1971

REFUSAL OF PLANNING PERMISSION

Correspondence address

Applicant

MR R BEGG
MWT ARCHITECTS (IPSWICH) LTD
32 SILENT STREET
IPSWICH
SUFFOLK IP1 1TG

MR M E D ROBINSON

Part 1 - Particulars of Application

Date of application: 10th December 1986
Date received: 23rd December 1986

Application No. B/1144/86

Particulars and Location of Development:

OUTLINE - RESIDENTIAL, PUBLIC PARK, SHOPS, PUBLIC HOUSE,
MEDICAL CENTRE, SUPERMARKET, EXHIBITION CENTRE, HI-TEC
BUSINESS PARK AND CONSTRUCTION OF NEW ROADS AND
ALTERATION TO EXISTING ROADS

LAND BETWEEN A45 BY PASS AND CHANTRY PARK
SPROUGHTON

Part 2 - Particulars of Decision:

The BABERGH DISTRICT COUNCIL hereby give notice dated 14th May 1987
in pursuance of the provisions of the Town and Country Planning Act 1971 that
PERMISSION HAS BEEN REFUSED for the carrying out of the development referred to
in Part 1 hereof for the following reasons:

- 01 The application involves the carrying out of development which is contrary to the provisions of both the Approved County Structure Plan and the proposed alterations to the County Structure Plan relating to both the scale and location of future large scale development in the Ipswich Policy Area.
- 02 The application involves the carrying out of development which is contrary to the provisions of both the Approved County Structure Plan and the proposed alterations to the County Structure Plan which aim to maintain the open character of land which separates the villages around Ipswich from each other and from Ipswich itself.

**Babergh
District Council
South Suffolk**

Council Offices
Corks Lane
HADLEIGH
Ipswich
IP7 6SJ

B/1144/86

Continued.....

- 03 The application involves the carrying out of development which would break through a strong existing visual edge to Ipswich into an area of attractive countryside the environment of which would be unacceptably disturbed. In addition, a number of significant views into the area would be seriously and adversely affected.
- 04 The application concerns the carrying out of development which would result in the loss of agricultural land. For this reason M.A.F.F. objects to the proposed development on the following grounds:-
- The majority of the site is land of high agricultural value.
- 05 The Suffolk County Council as Highway Authority have issued a direction in accordance with Article 12 of the Town and Country Planning General Development Order 1977 to the effect that planning permission must be refused for the following reason:-
- Approval of this application would result in a material increase of traffic using existing public roads which do not have sufficient capacity.
- 06 The application does not demonstrate that the proposed development can or will be satisfactorily drained to the public sewerage system.

T. E. Brown

Land at Red House, Chantry Vale, Sroughton: Landscape Appraisal

September 2019

Final Report



Alison Farmer Associates Ltd
29 Montague Road
Cambridge
CB4 1BU
Tel: 01223 461444
email: af@alisonfarmer.co.uk
web: alisonfarmer.co.uk

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1.0 Introduction

- 1.1 This report has been prepared by Alison Farmer Associates Ltd on behalf of David and Annette Brennand of Red House, Sproughton. This assessment has been undertaken in response to proposals put forward by Taylor Wimpy in relation to land surrounding Red House, and the allocation of this land for housing in the Babergh and Mid Suffolk Joint Local Plan – Preferred Options Consultation – July 2019.
- 1.2 The assessment focuses on key landscape/townscape surround Red House and is referred to as Chantry Vale throughout this report. Consideration is given to the issues which are likely to arise as a result of the proposed development in order to inform representations submitted in relation to the Local Plan consultation.
- 1.3 This assessment has included reference to the following documents:

Background Studies

Suffolk Landscape Character Assessment
 Joint Babergh and Mid Suffolk District Council Landscape Guidelines, August 2015
 Babergh and Mid Suffolk Joint Local Plan, Strategic Housing and Economic Land Availability Assessment (SHELAA), August 2017
 Sensitivity and Capacity assessment Ipswich Fringes, Alison Farmer Associates, July 2018

Relevant Planning History

Babergh District Council refusal of planning permission for development on land between A45 by-pass and Chantry Park, Sproughton, May 1987
 Inspectors Report from public inquiry in relation to development at Chantry Vale, 1988.
 Landscape and Appraisal, Wolsey Grange 1, Pegasus Environmental, 2015
 Planning Committee Report for Wolsey Grange 1, Feb 2016

Current Proposals – Wolsey Grange 2

Wolsey Grange 2, Vision Document, Boyer, November 2017
 Representations on the Babergh and Mid Suffolk District Joint Local Plan Consultation (Reg18), Boyer, November 2017
 Environmental Statement – Scoping Report, Boyer, May 2019
 Babergh and Mid Suffolk Joint Local Plan Preferred Options Consultation, July 2019
 Public Consultation documents, Sept 2019

- 1.4 This work has included desk study and field assessment undertaken in July 2019. Reference has been made to associated studies including:

Review of Catchment Hydrology and other Drainage Related Matters, JPC Environmental Services, July 2019
 Heritage Impact Assessment, Michael Collins, September 2019

2.0 Planning Context

National Planning Policy

- 2.1 The National Planning Policy Framework (NPPF) 2019 sets out the government's planning policies for England and how these are expected to apply. At the heart of the NPPF is a presumption in favour of sustainable development which is to be achieved through three interdependent overarching objectives. These include economic, social and environmental. The latter objectives seek to contribute to protecting and enhancing our natural, built and historic environment.
- 2.2 More specifically the NPPF requires planning policies and decisions to contribute to and enhance the natural and local environment by:
- Protecting and enhancing valued landscapes.....
 - Recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystems services....

Babergh and Mid Suffolk Joint Local Plan, Preferred Options Consultation

- 2.3 In July 2019 Mid Suffolk and Babergh published their Joint Local Plan, Preferred Options Consultation. This identified land north of the A1071 for housing development (site LA013). This site, which surrounds Red House is estimated to accommodate 1,100 new dwellings and associated infrastructure. The Local Plan makes clear that development on this site shall be expected to comply with the following:
- i. The relevant policies set out in the Joint Local Plan;
 - ii. Landscaping will be included to reflect the sensitivity of the landscape of the area;
 - iii. An ecological survey and any necessary mitigation measures are provided;
 - iv. Design, layout and landscaping is sympathetic to the close setting of heritage assets;
 - v. Public rights of way which pass through the site are retained and enhanced;
 - vi. If appropriate, measures are used to mitigate against noise pollution from the A14 and odour pollution from Water Recycling Centre;
 - vii. A free serviced site of 3ha should be reserved for a new pre-school and primary school plus proportionate contributions towards the build costs;
 - viii. Contributions to the satisfaction of the LPA, towards healthcare provision;
 - ix. Contribution to the satisfaction of the LPA, towards additional Household Waste Recycling provision;
 - x. Contributions, to the satisfaction of the LPA, for improving local pedestrian links;
 - xi. Contributions, to the satisfaction of the LPA, towards junction improvements of the A1071; and
 - xii. A full assessment of increased discharge on the watercourse, and relevant mitigation measures.
- 2.4 Beyond site LA013, and within its context, are two other development sites. The first comprises Sroughton Enterprise Park / former sugar beet factory site which is

allocated for employment (LA018) part of which has already been built out with the construction of a new High Bay Distribution building.

- 2.5 The second is LA014 which lies to the south of the A1071, comprising housing development as part of Taylor Wimpey site Wolsey Grange 1. This development is currently under construction and includes the establishment of an attenuation pond with the LA013 site (refer to Concept Framework on page 19).
- 2.6 Policy LP18 of the Joint Local Plan Preferred Options Consultation is of key relevance to landscape. It states that:

The Councils will support:

- a. *Development in suitable locations which will not adversely affect the natural environment including landscape character sensitivity and visual impacts of the proposal on the wider area (including effect on health, living conditions)*
 - b. *New development that integrates positively with the existing landscape character of the area and reinforces the local distinctiveness,*
 - c. *Proposals that are sensitive to their landscape, visual and amenity impacts (including dark night skies): subject to siting, design, lighting, use of materials and colour, along with the mitigation of any adverse impacts;*
 - d. *Development that enhances and protects landscape value such as; locally characteristic landscape features, archaeological and historic patterns of settlement and land use and designations; being demonstrably informed by local guidance, the Council's Local Landscape Guidance, the Suffolk Landscape Character Assessment and Settlement Sensitivity Assessment.*
- 2.7 The supporting text in paragraph 15.24 explains that landscapes which are not designated may nonetheless be attractive and important in terms of distinctive character and sense of place and in paragraph 15.27 that the Local Plan seeks 'to protect and, where possible, enhance the landscape taking account of its natural beauty and features...of...interest. To ensure all new development proposals respond to and reinforce the local distinctiveness of the area in scale, form, design, materials and location.'

Planning History

- 2.8 In May 1987 Babergh District Council refused planning permission for mixed use development comprising 1,600 dwellings between the A45 by-pass and Chantry Park – planning application B/1144/86. This scheme extended across the land now forming site LA013. A key reason for refusal included:

'The development would break through a strong existing visual edge to Ipswich into an area of attractive countryside which would be unacceptably disturbed'.

- 2.9 The decision was appealed, and a subsequent public inquiry held which found against the development.

- 2.10 The Inspector, in reaching his decision to dismiss the appeal, made the following comments:

'18.13 The Chantry Vale appeal site comprises a substantial area of attractive, open rolling farmland between the by-pass and the existing urban edge of Ipswich. Its topography makes it prominent to view and its landscape features make a significant contribution to the attractive approach to Ipswich from the west. It also affords attractive views from other roads and footpaths which surround and cross the site.

18.14 Much of this scenic quality is due to the notable tree screen which borders the eastern side of the site. The general effect is of open countryside extending unbroken across the site and up to the very edge of the town, which is scarcely apparent behind the trees. The sugar beet factory, though unsightly itself, is seen as a relatively minor feature in terms of the large scale, long distance views.

18.15 The proposed development would extend housing beyond the wooded perimeter of the town into the open countryside. Housing would cover the slopes rising from the Gipping Valley which are exposed to view. Landscaping would not compensate for the loss of the fine views which are now enjoyed into and across the site. The setting of the listed buildings at Red House Farm would be seriously harmed.

18.26.... The development of some 1,600 houses on the site, however sympathetically designed, would result in irreparable harm to those characteristics on which I place a very high value. The development would also detract markedly from the setting of Red House Farm.

[emphasis added]

- 2.11 Babergh District commented at the inquiry that:

'Development would ruin forever the beautiful natural approach to the west of Ipswich'

Covenanted Land

- 2.12 Approximately 22 acres of farm land immediately surrounding Red House is covenanted land insofar as it is subject to a restrictive covenant constraining its use other than as agricultural land. The extent, however, of the covenanted land, is not a reflection of land that forms the rural setting to Red House – clearly this extends further. Rather the extent of the covenanted land reflects the agreement and negotiations between the parties.

Summary

- 2.13 The following conclusions can be drawn:

Planning policy seeks sustainable development which conserves and enhances valued landscape and intrinsic beauty and character of the countryside.

Past planning applications for this area of land highlight the inherent sensitivities of the site.

3.0 Existing Landscape Studies

Introduction

- 3.1 Policy LP18 of the Babergh and Mid Suffolk Joint Local Plan, Preferred Options Consultation sets out those documents which should inform development proposals and provide an important evidence base. This section considers these three documents in more detail and specifically in relation to the land surrounding Red House. It also considers the relevant Green Infrastructure Study.

Suffolk Landscape Character Assessment

- 3.2 The Suffolk Landscape Character Assessment defines landscape types which repeat across the county. Three-character types occur within Chantry Vale and are illustrated on Figure 1. Most of the area comprises Rolling Valley Farmlands which form the undulating valley sides of the Gipping. Above these slopes to the south sits a flatter plateau landscape (Plateau Farmlands) while to the north is the valley floor of the Gipping comprising Valley Meadowlands. Relevant key characteristics for each of the landscape types are set out below.

Rolling Valley Farmlands

- 3.3 This landscape type is described as having:

Small to medium sized fields on the valley sides with an organic form which was created by piecemeal enclosure of common arable and pasture lands.

Field size tends to increase on the upper sides and plateaux edges of these valleys.

The overall impression in the landscape is of sinuous and organic boundaries around the anciently enclosed fields.

This is a rich and varied landscape..... the steeper valleys and sunken lanes contrast clearly to most of the other valley networks in the county.

Much of this landscape retains its historic patterns, of both the agricultural and built environment. However, the Gipping valley has been a focus of economic activity and as such has been subject to transport and industrial developments.

- 3.4 The guidelines for this type note the following:

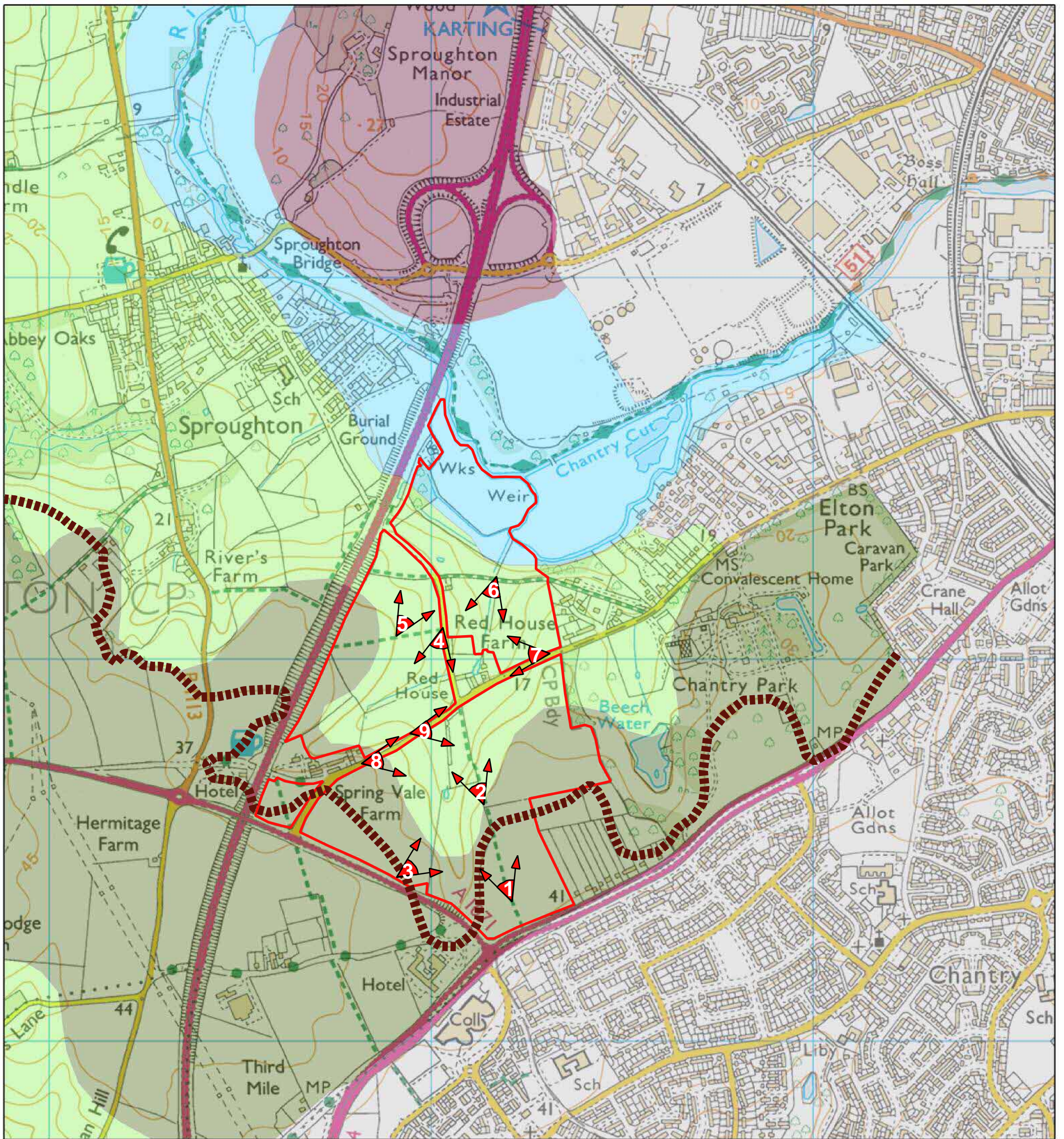
Woodland frames the valleys and is often present on the upper slopes.

The spatial relationship of this landscape to the adjacent valley floor means that change and development here can have a profound visual impact.

A landscape that is.... highly sensitive because of the landform and the particularly rich built heritage.

- 3.5 In relation to development the LCA notes for the Rolling Valley Farmlands that:

In these valley side landscapes; the visual impact of new vertical elements is increased by the landform. Therefore, new buildings are likely to have a

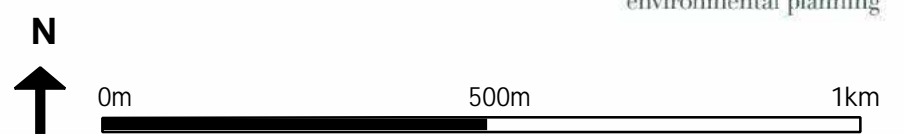


Key

- Land north of A1071
- Plateau Farmlands
- Rolling Estate Farmland
- Valley Meadowlands
- Rolling Valley Farmlands
- Visually Important Break in Slope (35m Contour)
- 3
3
3
3
 Viewpoints

**Land at Red House, Chantry Vale
Landscape Appraisal**

Figure 1: Landscape Character and Viewpoints



significant impact on both the character and visual amenity of valley floor and valley side landscape types.

The setting of specific features and elements of these landscape, such as small-scale enclosure patterns or historic buildings and monuments, can also be significantly damaged.

The majority of development will, to some degree, be subject to this problem. Therefore, it is essential to manage the issue effectively, taking every opportunity....to modify and improve...or be clear...that the impact of the proposal is unacceptable or may be at a high risk of refusal due to landscape impacts.

Valley side landscapes have historically been a focus for settlement. However, large scale expansion should be confined to the adjacent plateau. In this location the landscape and visual impact can be more easily mitigated with effective planting and design.

Settlement extensions in a valley side landscape.... tend to create a highly visible new 'roofscape' on the sides of the valleys. The effect of this can be partially mitigated by planting within the development as well as on the perimeter and offsite. It is essential to ensure that there is sufficient space within the development for effective planting, and that any requirement for offsite planting is considered at the earliest stage.

Plateau Farmlands

- 3.6 This landscape type forms the higher land between river valleys and includes Chantry Park to the east of Red House and site of Wolsey Grange 1 to the south of the A1071. It is described as comprising:

Predominately arable landscape.

Flat or gently rolling landscape of medium and occasionally light soils.

Settlement pattern generally of dispersed farmsteads and small hamlets, with occasional larger villages.

Woodland is a consistent feature, mostly taking the form of plantation woodland often associated with landscape parks such as at Chantry.

Condition of this landscape is mixed, with some areas slightly degraded, but there are also gems such as Chantry Park.

- 3.7 The guidelines for this landscape type focus primarily on the wider agricultural landscape and are not directly relevant to the plateau farmlands in the vicinity of Red House. This is because in this location much of the Plateau Farmland has been or is in the process of being developed with only the fringes, (where they form the setting and context of the Gipping Valley), remaining in agricultural use. Whilst Chantry Park is included in this landscape type it sits on the valley slopes and has similar topography to the site, sloping towards the Gipping Valley. These slopes are less apparent from the surrounding landscape however, in part due to development which has occurred to the north of the Hadleigh Road.

Valley Meadowlands

- 3.8 This landscape type forms the valley floor of the main river valleys. It is described as comprising:

Flat landscapes of alluvium or peat on valley floors.
 Grassland divided by a network of wet ditches.
 Occasional carr woodland and plantations of poplar.
 Occasional small reedbeds.
 Limited to no settlement.
 Cattle grazed fields with some fields converted to arable production.

- 3.9 The management guidelines for the Valley Meadowlands notes that these landscapes can be profoundly affected by changes to the management of land and the construction of buildings on the valley sides. In terms of land management, lack of appropriate grazing or conversion to arable and the planting of inappropriate woodland species can have adverse effects on the setting of this landscape.

- 3.10 The LCA notes, in relation to development in the setting of the Valley Meadowlands, that:

'Construction of buildings that project above the skyline should be avoided if at all possible.... through repositioning.... planting or reducing the height of the development...'

Mid Suffolk and Babergh Landscape Guidelines

- 3.11 This guidance document highlights the importance of ensuring that new development does not harm the quality of the countryside/landscape it is set within and therefore the quality of life benefits it offers in terms of health and wellbeing that come from a rural landscape in good condition.
- 3.12 In relation to the Rolling Valley Farmlands landscape type which comprises the majority of the landscape surrounding Red House, the guidance states that *'due to the rolling landscape, development in this area is considered to have a wide zone of visual impact. All development must take into consideration the cultural and historic importance of this area...'*

Settlement Sensitivity Study

- 3.13 In July 2018 Suffolk Coastal, in association with Babergh, Mid Suffolk and Ipswich Local Authorities commissioned a Settlement Sensitivity Study. This study considered land adjoining Ipswich and the settlements which lay within its fringes.
- 3.14 The purpose of this study was to:

Inform the preparation of local plan policies and land use allocations.
 Inform the submission and determination of planning applications.
 Identify priorities for the enhancement, protection, management and conservation of landscape areas and the goods and services they can provide.

- 3.15 The area of Red House falls within assessment area IP6. The assessment of this area notes that:

'The sensitivity of this area lies in its small-scale river valley character, natural and cultural heritage interest and as a valued recreational resource. The valley slopes are also valued in providing a buffer and sense of perceived separation between the existing urban edge of Ipswich and the Gipping Valley, the latter reading as part of the wider western setting to the town.'

The valley sides around The Red House have a high sensitivity (despite being east of the A14 and in close proximity to the existing urban edge) due to their intact rural character, visual connectivity to the wider landscape to the west and high visibility. This area acts as an important setting both to the Gipping Valley and Ipswich. The land immediately to the north forms part of the former sugar beet factory and is less sensitive due to its lower elevation. Nevertheless, it sits adjacent to the river and offers opportunities to create a stronger river corridor for wildlife and recreation connecting land to the west into the heart of Ipswich.'

[emphasis added]

- 3.16 Within the assessment table the following points are made which are considered relevant to the Red House area:

The valley floor is relatively flat comprising meadows and plantations and some arable while the valley sides are predominately arable in medium to small scale fields with notable areas of woodland particularly on the upper slopes.

Fragmentation of the valley landscape as a result of infrastructure and development...nevertheless many parts of the river valley landscape and valley sides remain intact and have a strong sense of place.

Housing on the edge of Ipswich is not readily apparent from this landscape due to its position set back from the lip of the valley and due to vegetation along the A14.

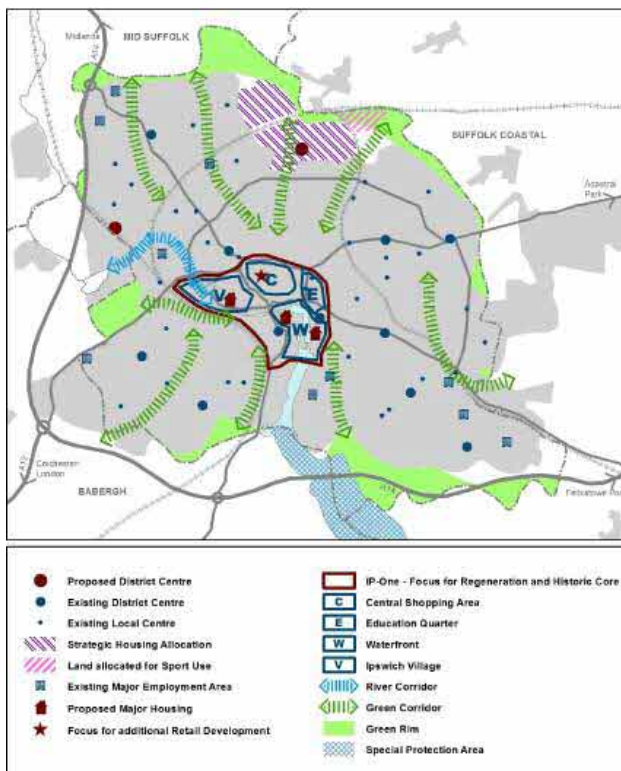
Within the valley itself in the area of Chantry Cut/ former Sugar Beet Factory the existing urban edge is fragmented and has an unkempt and disused character, the river and canal (Chantry Cut), lost from view and relatively inaccessible. However, to the south, housing on the southern valley slopes is well integrated and has a soft urban edge flanked by relatively intact agricultural land between the housing and A14. This landscape offers one of the most attractive approaches to Ipswich along the Hadleigh Road.

The topography of the valley sides means that many areas of the valley are highly visible and provide an agricultural setting to the valley landscape. In particular the open agricultural southern valley slopes in the vicinity of Red House, between the A14 and existing urban edge are visually prominent giving rise to a rural context to Ipswich and the River Gipping as well as reinforcing perceptions that this section of the Gipping Valley is separate from Ipswich, the urban edge of which lies beyond.

Some noise intrusion from the A14.... Away from these areas there is a sense of tranquillity and strong sense of place.

Green Infrastructure

- 3.17 The Haven Gateway Green Infrastructure Strategy was first published in 2008 and updated in 2015 and concluded that development in areas around the northern and western part of Ipswich should be expected to provide enhancements towards the network of strategic accessible natural green spaces. Furthermore, the Ipswich Core Strategy, adopted in February 2017, set out a strategy for the future development of Ipswich. A key challenge noted in the document was ensuring that Ipswich accommodates growth in a way that enhances its character and unique sense of place and residents' quality of life.
- 3.18 The Ipswich Key Diagram within the Strategy (see below) reaffirms the 'green rim' of countryside around parts of the settlement and green corridors along the river corridor of the Gipping which penetrate the urban area. The Core Strategy recognises that the value of these corridors is enhanced when they connect to the wider countryside in neighbouring authority areas. This is important as although the mapping of river corridors and 'green rim' extends only as far as Ipswich Borough boundary, it is clear they continue westwards into Babergh District. The mid to upper slopes of Chantry Vale are visible from the wider landscape beyond the A14 and form part of the 'green rim' around Ipswich. Furthermore, within Chantry Vale, the 'green rim' and Gipping river corridor closely interrelate and are of additional value as a result.



Extract from Ipswich Core Strategy 2017

Summary

3.19 The following conclusions can be drawn:

Several independent assessments have articulated the character, value, and function of land at Chantry Vale.

4.0 Landscape Appraisal of Chantry Vale

Local Character

- 4.1 The character of the landscape surrounding Red House is influenced by underlying geology and natural springs which have given rise to the topography of the area and influenced historic settlement pattern and land use. The landscape forms part of the southern valley sides of the River Gipping, the lower lying land of the valley floor occurring to the north with a rim of higher land or plateau occurring to the south. The area is drained by two tributary valleys which come together in the vicinity of Church Lane and Red House and flow on to join the River Gipping in the north. These tributary valleys create gentle undulations set within predominately north facing slopes that creating a distinctive bowl or 'vale'. The area is often referred to locally as 'Chantry Vale'. The break in slope between the valley sides and wider plateau to the south occurs around the 35m contour and is illustrated on Figure 1.
- 4.2 Land use comprises a mixture of arable and pasture in medium to small scale fields defined by hedgerows and occasional mature trees which lend a mature and established character.
- 4.3 The Heritage Assessment undertaken by Michael Collins sets out the historic development of Red House and associated barns, its adjoining landscape, including Chantry Park.
- 4.4 The geology, drainage and topography have all influenced the siting of farmsteads which took advantage of the folds in landform and natural supply of water e.g. Spring Vale Farm and Red House Farm.
- 4.5 Today the historic elements of the landscape are still legible and influence present day landscape character. Historic Landscape Characterisation classifies the land surrounding Red House to the north and east as Pre 18th Century enclosures while to the south and west as pre 18th Century enclosures or later and former parkland associated with Robert Harland (refer to Heritage Impact Assessment by Michael Collins). The first edition OS maps show the same historic lanes and routes, dispersed farmsteads at Red House and Spring Vale, historic parkland at The Chantry and division of small to medium scale fields defined by hedgerow trees. Much of the enclosure pattern remains intact with only some alteration where infrastructure, such as the A14 and A1071, has caused the severance of fields. Development beyond the area has, to date, had limited influence on perceptions of the area, which retains a strongly rural character.
- 4.6 The landscape around Red House or 'Chantry Vale' comprises a sizable tract of countryside on the edge of Ipswich. The topographic variation across this landscape coupled with its historic character and rural land uses gives rise to a distinctive sense of place which has a coherence and physical intactness. Although the A14 lies immediately to the west of the site it is in cutting and its margins vegetated. It does not visually impinge or intrude into this landscape although traffic noise is noticeable in the

north-western part of the site due to landform and prevailing wind direction. The rest of the area is relatively tranquil, its rural character rare in the content of Ipswich's immediate fringes.

Topography and Views

- 4.7 Views across this landscape have been grouped into elevated views, low lying views and sequential views and are located on Figure 1.

Elevated Views from Mid to Upper Slopes

- 4.8 The topography of this area enables elevated views which focus northwards across the 'vale' and Gipping Valley to the wider countryside beyond as well as to the fringes of Ipswich which extend down the northern slopes of the River Gipping. These views are across long distances and are discussed further in relation to Viewpoints 1 – 3 below.

Viewpoint 1

- 4.9 From the mid to upper slopes there are extensive long-distance views to the wider agricultural landscapes. The A14 is not evident in these views and the 'vale' is perceived as part of unbroken countryside stretching beyond the fringes of Ipswich.



Viewpoint 1: Looking northwest across the valley to elevated land beyond the A14 around Thornbush Hill

Viewpoint 2

- 4.10 Once beyond the 35m contour the land begins to flatten off. From here views to the wider landscape are more restricted, although the sense of a wider rural landscape can still be perceived.



Viewpoint 2: Looking south from plateau landscape

Viewpoint 3

- 4.11 From the existing urban edge along the A1071, and in the vicinity of Wolsey Grange 1, there are elevated views across Chantry Vale towards Ipswich seen in the distance on the other side of the Gipping. The gentle folds of the landscape are an important component of the rural foreground views. The High Bay Distribution Unit appears out of scale with the landscape, but its light colour and simple form mean that in many lighting conditions it does not stand out against the sky and the expanse of foreground landscape retains its intact rural character.



Viewpoint 3: Looking northeast from edge of plateau landscape across valley to Ipswich in distance

Views from Lower Lying Areas

- 4.12 From lower lying areas views are across the Chantry Vale and the gentle undulations of the valley sides. These views are framed by the higher land to the south and west which is frequently defined by a treed horizon or by vegetation along the valley floor and edges of Ipswich to the north and east. Development that comes close to the 35m contour and or sits on the edge of the upper slopes of the Vale can appear on the skyline. Figure 1 shows how the 35m contour extends across the A1071. As a result, the Holiday Inn building and the new housing (Wolsey Grange 1 currently under construction), appear on the skyline when viewed from the north, whereas development set slightly further back from the edge of the valley/plateau junction either side of London Road (at c 41m contour), recedes in views and is more effectively mitigated by existing vegetation.

Viewpoint 4

- 4.13 Wolsey Grange 1 is currently under construction to the south of the site and new two storey housing development at the entrance to the site is visible on the skyline from Chantry Vale. These properties are located around the 35m contour and are seen breaking the skyline and intruding into an otherwise rural valley landscape. To the right of these houses, vegetation along the A1071 forms a wooded skyline, defining the extent of the 'vale'.



Viewpoint 4: View from Church Lane looking north towards Wolsey Grange 1.

Viewpoint 5

- 4.14 Vegetation within the valley floor filters views to the north and places distance between the site and the existing Ipswich fringes which are visible on the opposite side of the Gipping. In the case of the High Bay Distribution Unit, its scale, colour and simplicity mean that it does not read as part of the built urban fringe and its light colour recedes against a sky backdrop.



Viewpoint 5: View looking north towards the Gipping Valley and Ipswich with large High Bay Distribution Unit building in foreground which visually recedes in views against the sky.

Viewpoint 6

- 4.15 The buildings of Red House are seen set within the lower folds of the landscape at the confluence of the two tributary valleys. Set amongst trees and surrounded by arable fields, the central position of these buildings means they a focus within the vale landscape and contribute to local distinctiveness and sense of place.



Viewpoint 6: Low level view on the edge of the Gipping floodplain looking south towards The Red House outbuildings

Approaches and Sequential Views

- 4.16 Key approach routes into Ipswich in the vicinity of Chantry Vale include the A1071 and Hadleigh Road. The A1071 lies along the southern boundary of the site on the highest land which forms the ridge between the Gipping and Belstead valleys. This route is fringed to the south by the Wolsey Grange 1 development and existing urban edge of Ipswich. Whilst there is some vegetation along the road and limited footpaths, the route has a generally urban character. Its relatively straight alignment and level gradient reinforce this perception. The gateway to Ipswich is reached just before the junction into Wolsey Grange 1.
- 4.17 In contrast the character of Hadleigh Road is quite different. This route has a sinuous form and varied gradient as it traverses the Rolling Valley Farmland and tributary valley to the Gipping. It is fringed by hedgerows and trees and arable fields with a variety of vistas into the wider surrounding countryside. As such the route affords a rural approach to Ipswich, the gateway to the town being reached at the junction with Larchwood Close. As noted in para 2.10 above, Hadleigh Road was identified by Babergh District as *'beautiful natural approach to the west of Ipswich'*. Similarly, the Settlement Sensitivity Assessment noted that Hadleigh Road and the adjoining open fields offer one of the most attractive approaches into Ipswich. The sequence of views gained along Hadleigh Road are illustrated in viewpoints 7-9 below.



Viewpoint 7: Looking west along Hadleigh Road towards The Red House and valley context.



Viewpoint 8: Looking northeast along Hadleigh Road towards Chantry Park and Ipswich



Viewpoint 9: Elevated view looking northeast from Hadleigh Road towards Red House set within an unspoilt, rural valley context.

Landscape Value

- 4.18 The landscape surrounding Red House formerly comprised part of the Gipping Valley Special Landscape Area which extended from the edge of Ipswich to include the Belstead Brook and its tributaries as well as the Gipping Valley around Sroughton. It included the valley landscape as well as the intervening higher plateau landscape between the valleys.
- 4.19 Special Landscape Areas are no longer part of the emerging Local Plan and a criteria-based approach has been adopted with reference to landscape character assessment. Nevertheless, the qualities inherent in the landscape are not lost as a result of the removal of local designation policy. As noted in para 2.2 above the NPPF seeks to conserve and enhance valued landscape. These are frequently determined with reference to the criteria set out in Box 5.1 of the Guidelines for Landscape and Visual Impact Assessment (GLVIA). The criteria include consideration of:
- Landscape Quality
 - Scenic Quality
 - Rarity
 - Representativeness
 - Conservation Interest
 - Recreation Value
 - Perceptual Aspects
 - Associations
- 4.20 The existing character and sensitivity assessment for this area indicate that this landscape is likely to have a weight of evidence that supports its recognition as a valued landscape. The findings of the Landscape and Visual Impact Assessment undertaken for the Wolsey Grange 1 development concur with this - the Rolling Valley Farmlands landscape character type to the north of the site was classified as having a

High Value, High Susceptibility and High Sensitivity (appendix 3 of the Landscape Appraisal - Viewpoint 7 Rolling Valley Farmlands Landscape Character).

- 4.21 Whilst it is accepted that changes in the vicinity of the site over the last 20-30 years has caused some alteration to the character and qualities of the land (such as the construction of the A14, the High Bay Distribution Unit and the current construction of Wolsey Grange 1), it nonetheless retains a distinctive and intact character which sets it above ordinary countryside. Its association with valued historic assets both designated and undesignated, coupled with its role in providing a unique and rare setting, approach and gateway to Ipswich, all increase its sensitivity. Furthermore, there is consensus regarding the value of this landscape, which is evident in past planning decisions and appeals, former local landscape designation and in the most recent character assessments and Settlement Sensitivity Assessment.

Conclusions

- 4.22 The following conclusions can be drawn:

Chantry Vale comprises an area of largely intact historic countryside on the edge of Ipswich and forms part of the Gipping Valley.

The landscape has many special qualities which support its consideration as a valued landscape.

The topography of the site influences its character and qualities as well as views. The open undulating character and sloping valley sides give this area a high visual sensitivity.

The landscape retains a sense of scale, intactness and cohesiveness which is rare on the fringes of Ipswich inside of the A14.

Development on the fringes of the area has not altered its rural character and scenic qualities and should not be used as a justification for development of the Vale.

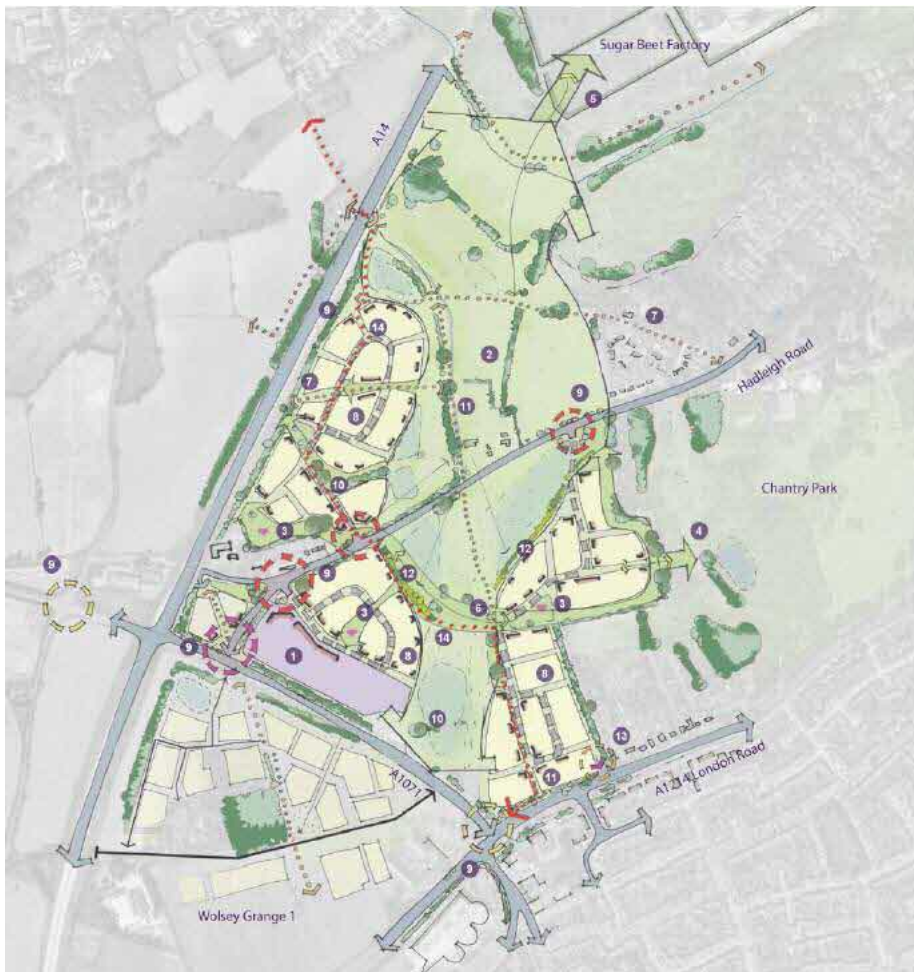
5.0 Review of Taylor Wimpey Documents

5.1 This section considers the nature of the proposed development within allocation LA013.

Proposed Development

5.2 The proposed development put forward by Taylor Wimpey is illustrated on the Illustrative Concept Masterplan below. It comprises:

- The construction of approximately 800 dwellings;
- Landscape and open spaces which create a north-south Green Corridor with SuDS;
- An area of land identified for a 2-form entry primary school in the south west;
- New junction arrangement between Hadleigh Road and A1071;
- Three new junctions off Hadleigh Road to provide access into the proposed housing areas, including a substantial new roundabout;
- 5 attenuation ponds located on the mid-lower valley slopes within the Green Corridor (shown as slightly darker colour).



Illustrative Concept Masterplan - Extract taken from recent Consultation Documents

- 5.3 It is noted that the allocation LA013 is for 1100 dwellings. Accommodation of additional housing on the site, above and beyond that shown in the masterplan, is likely to have ramifications for the density and or extent of development as well as for drainage and attenuation.
- 5.4 It should also be noted that the proposed scheme does not provide any details on the height of buildings or need for night lighting both of which can influence landscape effects.

Context

- 5.5 The Taylor Wimpy Vision Document (page 10) describes the context of the proposed development stating that the site is bound on three sides by the strategic road network including London Road to the east, the A1071 to the south and the A14 to the west. It goes on to state that '*This highway network represents a physical boundary to the site, divorcing it from the wider countryside.*' This statement appears to overplay the influence of surrounding road infrastructure. The A14 is not visible although it is audible in some areas depending on wind direction. The A1071 affects the fringes of the area where the landscape comprises part of the adjoining plateau and the Hadleigh Road provides one of the few remaining rural approaches to Ipswich. Viewpoint 1 above illustrates the limited impact of road networks on this area and demonstrates how this area is perceived as forming part of a wider landscape.

Sensitivity

- 5.6 The Vision Document states that the proposed development layout has been informed by site analysis of key constraints (page 20). However, this analysis fails to identify the inherent sensitivity of the site and does not include visual sensitivity of the sloping land, nor the role and function of the site in providing a setting to Ipswich, rural approach and distinctive gateway to the town.

Landscape Character and Mitigation

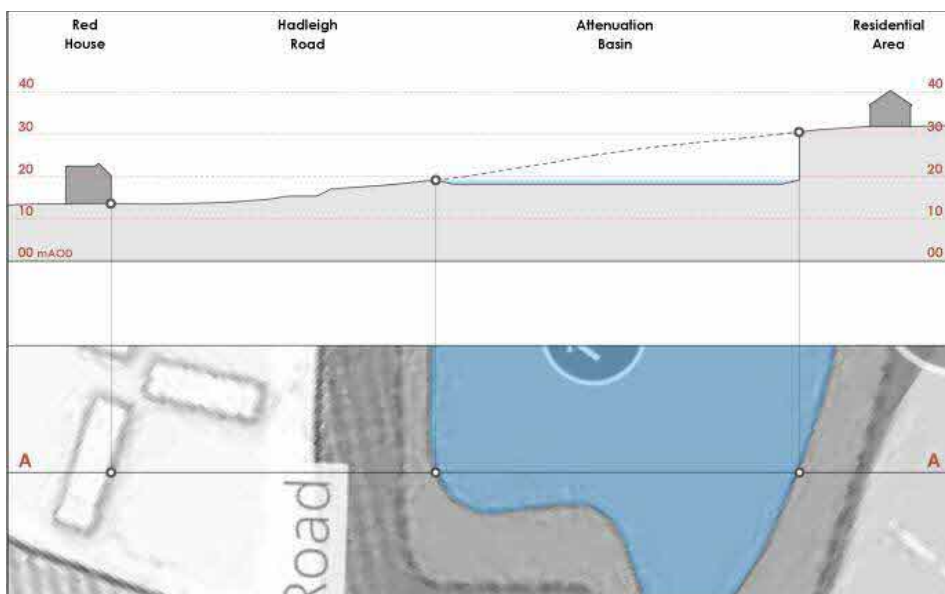
- 5.7 The valley landscape surrounding Red House stretches from the A14 to Chantry Park, (approximately 1km) and from the River Gipping to the A1071, again approximately 1km. The proposed development will result in a narrowing of the rural valley landscape to just c. 150m in width at its narrowest (shown on the Illustrative Concept Masterplan above). The development will extend down the valley slopes to around the 18m contour in the northwest and will foreshorten views. The proposed development would therefore fundamentally alter the character of the area. Such changes would not be possible to mitigate, even through landscape planting within the site, as it is the extent of open, rural countryside and vale topography which define the area's distinctiveness. These qualities would be lost and cannot be replaced.

Design Principles

- 5.8 The Illustrative Concept Masterplan (see above) shows some response to the sensitivities of the site through the creation of a north-south Green Corridor. However, development would cause a narrowing of the open 'vale' landscape resulting in built form impinging on the valley sides and on Red House. The green corridor will be visually and physically separated from the wider landscape to the west, its context will be urban, and it will contain five attenuation basins which will require alteration to the valley topography.
- 5.9 Furthermore, a smaller east-west green corridor shown on the masterplan would not contribute to perceptions of the 'green rim' which defines the Gipping Valley and setting of Ipswich. It would have an entirely different character and quality to the current extent of open countryside comprising Chantry Vale due to its narrow width and urban context. Proposed development on the valley slopes would fundamentally alter and fragment this tract of land.

Attenuation Basins

- 5.10 The north-south Green Corridor through the site accommodates 5 attenuation basins and the covenanted land surrounding Red House. This corridor connects to land to the south which accommodates a further attenuation pond as part of the Wolsey Grange 1 development. The attenuation basins are located part way up the valley slopes and will require alteration to topography for them to function. Although the form and layout of the attenuation basins are indicative at this stage the cross section below illustrates the difficulties likely to be experienced when incorporating them into relatively steep slopes. To avoid steep artificial embankments/slopes the basins will need to cover a greater area.



Based on the attenuation basins illustrated on conceptual drawing (Boyer – Nov 2019)

Gateways and Approaches

- 5.11 The introduction of a new junction between Hadleigh Road and the A1071 and three new access points off Hadleigh Road will significantly alter the sense of approach and gateway to Ipswich. Details of access arrangements/junctions have been provided in the recent public consultation. Those for the Hadleigh Road are illustrated below. These new road junctions, and especially the proposed substantial new roundabout, will have an urbanising influence, and indicate a need to partially realign and widen Hadleigh Road, with subsequent vegetation loss and a need for lighting.



Proposed road junctions taken from Taylor Wimpy Consultation Documents September 2019

- 5.12 Rather than approaching Ipswich along a winding, rural road through an area of historic farmland, the proposed development will result in the new gateway to Ipswich being pushed out as far as the junction of Hadleigh Road and the A1071. The 'green corridor' associated with the valley will become an incidental open space when travelling along Hadleigh Road, c. 450m in width between the two new access junctions into the development, and will be set within the context of housing which will rise up the valley slopes.

Degree of Fit

- 5.13 It could be argued that the retention of an area of green space through the centre of the site will enable the accommodation of the covenanted land and sense of valley landscape which forms a setting to heritage assets. On this basis the proposed development may be argued to have a good fit. However, this does not take account of the following:
- The character of the site will be fundamentally changed due to the loss of the scale and extent of open rural landscape. The open space which remains will be dramatically reduced and its urban context will give rise to perceptions of an urban open space rather than countryside.
 - Attenuation ponds and other infrastructure will have an urbanising influence on the character of the remaining open space and result in notable alteration to topography.
 - The orientation of open space north-south through the site will not retain an east-west 'green rim' and development of the site will result in the loss of valued views and connection to the wider countryside.

- d) The constraints of the use of the covenanted land other than as agricultural land, which preclude the land from having general amenity value.
- e) The introduction of three new access junctions off Hadleigh Road to service the proposed development will fundamentally alter the rural character and distinctiveness of this approach into Ipswich, substantially extending the gateway to the town westwards.

6.0 Conclusions

- 6.1 Overall the site is highly sensitive to the proposed development.
- 6.2 Areas of the site which may have some capacity to accommodate residential development are on the upper slopes above the 35m contour where they can be associated with the existing urban edge and mitigated through edge planting which can form a wooded skyline. Such a skyline would reinforce the 'green rim' and protect the Vale landscape from the visual intrusion of development. This approach to development would be in accordance with landscape character and existing landscape guidelines.
- 6.3 Key sensitivities of the site include:
- Isolated location of Red House and the importance of the rural landscape in providing an unspoilt and intact setting to this heritage asset.
 - Rural valley sides which are rare in the context of Ipswich.
 - Slopes which are visually sensitive connecting to the wider countryside.
 - Importance of scale in order to conserve and enhance the character of the valley and setting to Red House.
 - Importance of the 'green rim' for Ipswich and its setting.
- 6.4 These qualities matter because of their location on the edge of Ipswich and the easy reach of this countryside for the town's population. The area therefore forms an invaluable natural resource. These issues and sensitivities were previously identified in landscape studies which form an evidence base for the preparation of the Local Plan.
- 6.5 Even if development could be accommodated on the valley sides through mitigation (which is questionable) no amount of mitigation planting would address the fundamental change to the rural character of the valley landscape which forms the setting and context to Red House and more broadly to the southwest fringes of Ipswich.
- 6.6 The analysis indicates that Chantry Vale is likely to constitute a valued landscape. Even if the 'valued' status of the area is not accepted, the NPPF makes it clear that the intrinsic character and beauty of the countryside should be conserved and enhanced (para 170b).
- 6.7 On balance it is concluded that, due to the sensitivity of the land surrounding Red House, it is not possible for site LA013 to accommodate the proposed development without conflicting with Policy LP18. Development in this area would:

Adversely affect the natural environment including landscape character sensitivity and visual impacts;

Fail to integrate positively with the existing landscape character of the area nor reinforce local distinctiveness;

Fail to respond to the sensitivity of the area in terms of landscape, visual and amenity effects and be unable to satisfactorily mitigate adverse effects;

Not enhance and protect landscape value.

- 6.8 This raises concerns regarding the acceptability of the allocation of land at LA013. On this basis Babergh District is urged to reconsider this allocation as part of its Local Plan Consultation Process.

Heritage Impact Assessment

LAND NORTH OF THE A1071, SPROUGHTON

September 2019



Michael Collins
Listed Building Planning Consultant

PO Box 383
EYE
Suffolk
IP23 9AN

07809-131768
mc@michaelcollinslistedbuildings.co.uk

LAND NORTH OF THE A1071, SPROUGHTON

September 2019

Michael Collins

On behalf of the owners of Red House, David and Annette Brennand, the report has been prepared in response to the latest consultation on the emerging Babergh and Mid Suffolk Joint Local Plan. The 'Preferred Options' consultation document proposes an allocation of land on the 'Ipswich Fringe' for the construction of 1,100 dwellings. An appeal was dismissed in 1988 following the Council's refusal to grant permission for residential development across a site that is considered highly sensitive. The heritage and landscape values of the site remain unchanged and this report will accompany an objection to the proposed land allocation.

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1.0 CONSERVATION OF HISTORIC ENVIRONMENT

- 1.01 The historic environment is central to England's cultural heritage and sense of identity. It is a resource that should be sustained for the benefit of present and future generations. The sustainable management of a place begins with understanding its heritage values: in sum, its significance. Communicating that significance to everyone concerned with a place, particularly those whose actions may affect it, is then essential if all are to act in awareness of its heritage values. Only through understanding the significance of a place is it possible to assess how its values are vulnerable to harm or loss.

Conservation is achieved by all concerned with a significant place sharing an understanding of its significance, and using that understanding to judge how its heritage values are vulnerable to change; to take the actions and impose the constraints necessary to sustain those values; and to ensure that the place retains its authenticity – those attributes and elements which most truthfully reflect and embody the heritage values attached to it ('Conservation Principles, Policies and Guidance for the sustainable management of the Historic Environment'; Historic England, 2008).

- 1.02 Understanding a place and assessing its significance demands the application of a process which is appropriate and proportionate in scope and depth to the purpose of the assessment. To identify the heritage values of a place, its history, fabric and character must first be understood. Balanced and justifiable decisions about change in the historic environment depend upon understanding the values of a place and, with it, the ability to understand the impact of a proposal on that significance. Potential conflict between sustaining the heritage values of a place and other important public interests should be minimised by seeking the least harmful means of accommodating those interests. A willingness to consider and compare the impacts on the significance of a place of a range of options to achieve the public objective concerned is essential, as is selecting an option that either eliminates or, as far as is possible, minimises harm.
- 1.03 Conservation is the process of managing change to a heritage asset in a way that sustains its significance. The significance of a heritage asset is derived not only from its physical presence but also from its setting, and assessing the significance of a heritage asset, including the contribution made by its setting, is very important to understanding the impact of any proposal. Setting is an established concept that relates to the surroundings in which a place is experienced, embracing both past and present relationships. National planning policy establishes the twin roles of setting - it can contribute to the significance of a heritage asset and it can allow that significance to be appreciated.

- 1.04 The extent and importance of setting is often expressed by reference to the visual relationship between the heritage asset and the proposed development and associated visual/physical considerations. Although views of, from, or across an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by our understanding of the historic relationship between places. The settings of heritage assets change over time and understanding the history of change will assist when determining whether a proposal is likely to affect the contribution made by setting to significance. The importance of setting therefore lies in what it contributes to the significance of a heritage asset or to the ability to appreciate that significance.

The setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral ('National Planning Policy Framework'; MHCLG, 2019).

- 1.05 Not all settings have the same capacity to accommodate change without harm to the significance of a heritage asset or the ability to appreciate it. A particular type of location may increase the sensitivity of the setting, that being the capacity of the setting to accommodate change without harm to the significance of the heritage asset. 'Great weight' should be given to the conservation of a designated heritage asset when considering the impact of a proposal on its significance and any harm to its significance, including from development within its setting, should require clear and convincing justification. If there is any conflict between a proposal and the conservation of a heritage asset, consideration should be afforded to whether alternative options could deliver benefits in a more sustainable and appropriate way.
- 1.06 Setting is a matter of professional judgement. Historic England recommends the use of a clear narrative argument that sets out 'what matters and why' in terms of heritage significance and the effects of the proposal. A clear well-argued narrative text is also advocated by the Landscape Institute in their guidelines for impact assessment. Historic England recommends that an assessment of the significance of a heritage asset and the impact of a proposal on that significance should be undertaken as a series of stages. The assessment should first address the key attributes of the heritage asset itself, and then consider the physical surroundings of the asset, the asset's intangible associations with its surroundings and patterns of use, and the way views allow the significance of the asset to be appreciated. This assessment of the contribution to significance made by setting will provide the baseline for the third stage of the analysis which is to identify the effects a proposal may have on setting.

2.0 IDENTIFICATION OF AFFECTED HERITAGE ASSETS

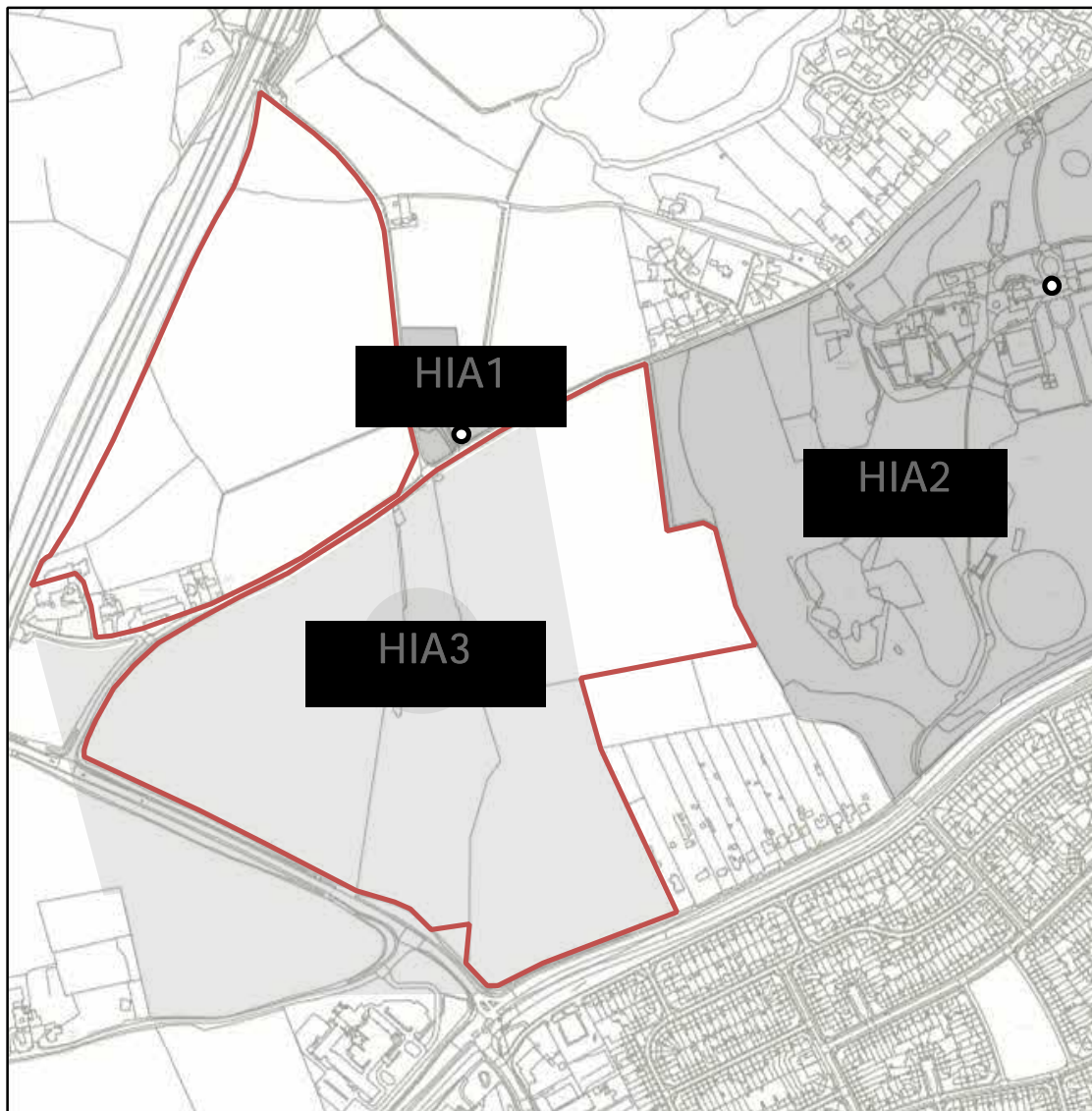


Fig.1 Proposed site allocation (outlined in red) and affected heritage assets

Ref.	NHLE	CHER	Designation	Heritage asset
HIA1	1285933	-	Listed Building	Red House
HIA1	1036924	-	Listed Building	Barn SE of Red House
HIA2	1037783	-	Listed Building	The Chantry
HIA2	1000271	IPS 248	Registered Park and Garden	Chantry Park
HIA2	-	-	Conservation Area	Chantry Park
HIA3	-	-	-	Buried remains (ma nsion)
HIA3	-	-	-	Former park
NHLE	National Heritage List for England			
CHER	County Historic Environment Record			

Fig.2 List of affected heritage assets

3.0 UNDERSTANDING OF HERITAGE ASSETS

- 3.01 Joseph Hodskinson's map of the county, published in 1783, illustrated the extent of the town of Ipswich in the late eighteenth century. The map also depicted the bounds of the wider administrative unit of the 'Liberty of Ipswich' and beyond, in the adjoining Hundred of Samford, were portrayed a pair of large country houses with each being set within its own park. Survey work for the map was undertaken in about 1780. John Kirby had undertaken a survey of the county in the early 1730s which had resulted in the publication of a map in 1736. His sons, Joshua and William Kirby, had published an 'improved version' of the map in 1766 and this had also shown a pair of houses, albeit that only one (that furthest to the west) was shown imparked at that time. The number of parks increased rapidly in the middle decades of the eighteenth century and the wealthy preferred to reside within easy reach of urban centres (Tom Williamson, 2000).
- 3.02 John Kirby's book, 'The Suffolk Traveller', was first published in 1735 and this edition included references to both Edward Ventris' 'new built seat called the Chantry' and also the nearby 'seat of Robert Harland'.

In the parish (of Sproughton) we observed a very good new built seat called the Chantry. This with some other estates of considerable value were called the Chantry Lands because they were given by Edmund Daundy in 1514 for establishing a chantry in Saint Lawrence church in Ipswich for two perpetual secular priests to sing mass and pray for the said Edmund Daundy and for the soul of Anne his late wife. It is now the mansion of Edward Ventris; near this is the seat of Robert Harland ('The Suffolk Traveller', 1st edition; John Kirby, 1735).

- 3.03 A second edition of the book, with 'many alterations and additions,' appeared in 1764 under the editorship of the Reverend Richard Canning. From this edition we learn that Edward Ventris, who was by then deceased, was responsible for the construction of the house which stood in the early 1760s (the 'Chantry'), and that Robert Harland had by that date also 'partly rebuilt and greatly improved' the other house to the west.

Edmund Daundy founded a chantry in (Saint Lawrence) church for a secular priest to offer on behalf of himself and his relations; and gave this priest and his successors his house in Saint Lawrence parish for a mansion, and his lands in Sproughton for a maintenance ... In the parish (of Sproughton) two good seats have been built; one called the Chantry, from it being on lands given by Edmund Daundy for endowing a chantry in the church of Saint Lawrence. The present house was built by the late Edward Ventris; of whose heirs it was purchased by the late Sir John Barker and is now vested in his son, Sir John Fytch Barker, who resides here. Near to this is the seat of Robert Harland, by whom it has been partly rebuilt and greatly improved ('The Suffolk Traveller', 2nd edition; Richard Canning, 1764).

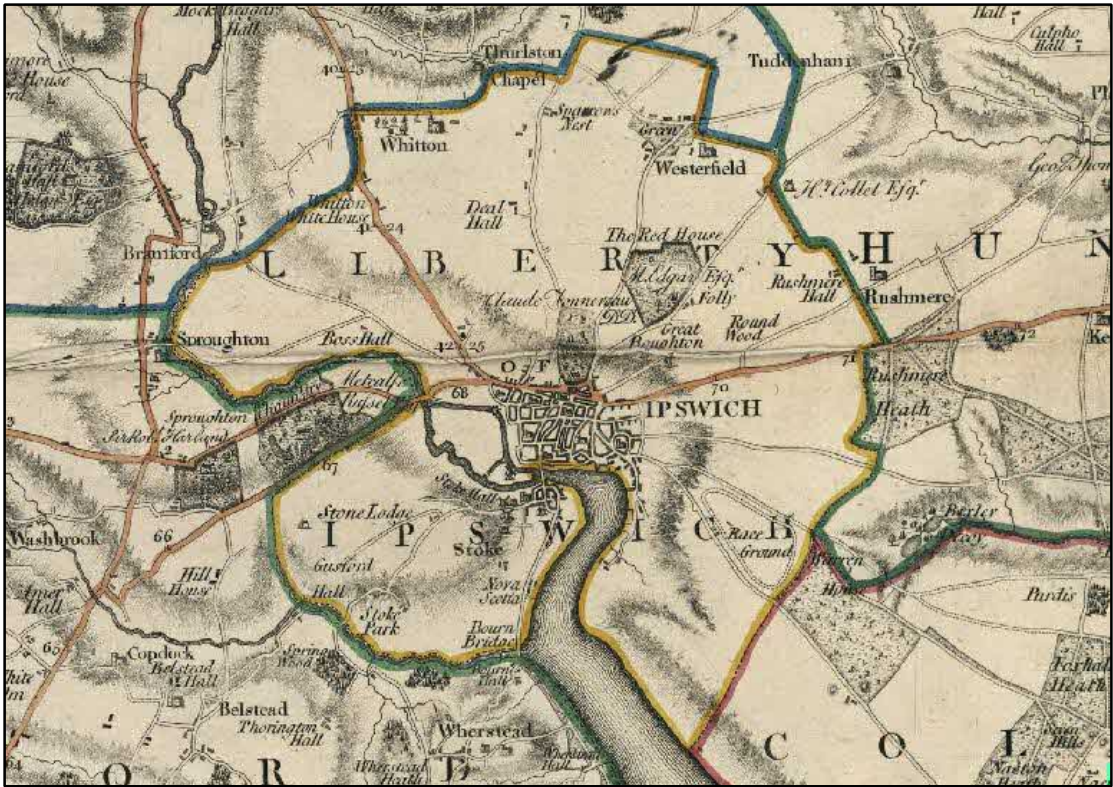


Fig.3 Joseph Hodskinson's map of the county of Suffolk (1783)



Fig.4 Detail of Hodskinson's map depicting the seat of Sir Robert Harland (1783)

- 3.04 Captain Robert Harland¹ (c.1675-1751) married Frances Clyatt (c.1691-1716) in 1710. On the death of both his wife and second son William (an infant) in 1716, Robert¹ purchased an estate at Sproughton where he resided until his eldest son, Robert², was married in 1749. Robert² (c.1715-84) entered the navy in 1729 and was made captain in 1742. He was promoted to rear admiral in 1770, vice admiral in 1775 and admiral in 1782, and in the period 1782-3 served as one of the Lord Commissioners of the Admiralty. Robert² was created 1st Baronet of Sproughton in 1771 and, having retired from the Admiralty in 1783, died at his Sproughton residence in 1784.
- 3.05 The 'seat of Robert Harland' referred to in the first edition of 'The Suffolk Traveller' (1735) was that of Captain Robert Harland¹ (c.1675-1751) which he was in possession of from about 1716 to 1749. The 'seat of Robert Harland' as mentioned in the second edition (1764) was that of Sir Robert Harland² (c.1715-84) and it is he who was presumably responsible for it being 'partly rebuilt and greatly improved' (c.1749x64). Hodskinson's map of 1783 therefore portrays the property of Admiral Sir Robert Harland², Baronet of Sproughton.
- 3.06 Robert Harland² had married Susanna Reynold in 1749. Their son, Robert Harland³ (c.1765-1848), succeeded to the baronetcy and it was he who 'pulled down the residence at Sproughton between 1790 and 1794'. Robert² had considerably increased his estates in the county, with the acquisition of the Belstead estate from the Blois family and an estate in Wherstead from the Coke family, and Robert³ now chose to reside on the Wherstead estate.

Wherstead Lodge, now of Sir Robert Harland, whose ancestor, a distinguished naval officer, was created a baronet in 1771, by the title of Sir Robert Harland of Sproughton, where he had at that time a seat, since taken down. He died in 1784 The Chantry, the seat of C.S. Collinson, built by Edward Ventris, is so called in consequence of its erection upon the lands given by Edmund Daundy for endowing a chantry in the parish church of Saint Lawrence. Near to this was the residence of Admiral Harland ('Excursions in the County of Suffolk'; Thomas Cromwell, 1818).

- 3.07 In 1801 Robert Harland³ married Arethusa Vernon and in 1818 he came into the possession of the Orwell Park estate through his wife. The former seat of Admiral Edward Vernon (c.1684-1757) had passed to Francis Vernon (c.1715-83) who had laid out the park (1757x64) before, in the 1770s, reconstructing the Admiral's house (built 1725-9). Robert³ died in 1848, without issue, and the baronetcy (of Sproughton) became extinct.

Orwell Park is now the seat of Sir Robert Harland, only son of Admiral Sir Robert Harland, late of Sproughton, Bart., so created in 1771 The house formerly the residence of Admiral Sir Robert Harland has been pulled down ('Supplement to the Suffolk Traveller'; Augustine Page, 1844).



Fig.5 Captain Robert Harland¹ (Dahl)



Fig.6 Admiral Sir Robert Harland² (Heins)



Fig.7 Orwell Park - the seat of Robert Harland³ (Neale)

3.08 The 'Chantry Lands' were so-called because the perpetual chantry in the church of Saint Lawrence, which had been established by Edmund Daundy in the early sixteenth century (c.1514), was endowed with this land as maintenance for a priest. By the late 1660s this land was in the possession of Sir Peyton Ventris (c.1645-91) who would later serve as a Justice of the Common Pleas (1689-91). John Kirby (1735) observed a 'new built seat' called the Chantry which he noted was the 'mansion of Edward Ventris'. The second edition (1764) expanded upon this by attributing the building to 'the late Edward Ventris' (c.1684-1740) who had succeeded his father, Peyton Ventris, and who appears to have re-built the house in the early eighteenth century.

3.09 Edward Ventris of 'Sproughton Chantry' died in 1740 and the house was acquired by Sir John Barker (c.1724-57), 6th Baronet of Grimston Hall. John Barker was succeeded by his son, Sir John Fytch Barker (c.1741-66), who in about 1759 married Lucy, daughter of Sir Richard Lloyd of Hintlesham Hall. The baronetcy became extinct upon John's early death in 1766 and the resultant sale of the late 7th Baronet's Sproughton estate was duly advertised in 1771. The property included the mansion house (the 'Upper Chantry') and about 124 acres of land consolidated around the house, together with the adjoining farm (the 'Lower Chantry') and a further 70 acres

The mansion house of the late Sir John Fytch Barker, deceased, called the Upper Chantry in Sproughton. The garden belonging to it contains upwards of six acres. There is a piece of water of about two acres within two fields of the house. There are upwards of 116 acres of meadow, pasture and arable land lying together around the house. Also a messuage and farm called the Lower Chantry with upwards of 70 acres of meadow, pasture and arable land adjoining (The Ipswich Journal, 1771).

3.10 The estate was acquired by Metcalfe Russel who proceeded to alter the house (rainwater heads '1772') and would appear to have laid out the park in the same decade. Joseph Hodkinson's map of 1783 portrayed the extent of the 1770s park which stretched between Hadleigh Road and London Road and which placed the earlier mansion (the Upper Chantry) at its centre. The farm (the Lower Chantry) stood outside the park along its northern boundary.

3.11 Metcalfe Russel died in 1785 and the estate then passed to his elected heir Michael Collinson (d. 1795) and, afterwards, to Michael's son, Charles Streyntsham Collinson (d.1831). Charles was responsible for the planting in 1807 of the lime avenue that leads to London Road. Isaac Johnson's survey of the estate in the early nineteenth century (c.1812) recorded the existence of the perimeter planting along the west boundary of the park, known as 'Dovehouse Plantation', together with the 'canal' in the south-west corner of the park.



Fig .8 Sir Peyton Ventris (Riley)



Fig .9 Sir Fitzroy Kelly (Bull)



Fig .10 Sroughton Chantry (Neale)

- 3.12 The mansion house called 'The Chantry' (134 acres) and the farmhouse called 'The Lower Chantry' (65 acres) were offered for sale in 1836. The Chantry was purchased by Charles Lillingston (c.1804-51). Charles had married Harriette (c.1800-55), the daughter of the Reverend Charles William Fonnereau (c.1764-1840) of Christchurch Mansion, in 1827 and was recorded as the owner of the mansion and 'Chantry Park' (132 acres) in the tithe survey of 1838.
- 3.13 Charles Lillingston died in 1851 and the property was acquired the following year by Sir Fitzroy Kelly (c.1796-1880). Kelly took office as solicitor-general in 1852 and attorney-general in 1858. In 1866 he was raised to the bench as Lord Chief Baron of the Exchequer. The mansion was altered by Kelly in the mid-nineteenth century (c.1853-4), and he was also responsible for the erection of the gate-lodge at the north entrance to the park off Hadleigh Road and for the creation of the formal gardens on the south front. The latter involved the landscape architect William Andrews Nesfield (c.1793-1881).
- 3.14 Sir Fitzroy Kelly sold the house and park to Charles Binney Skinner in 1867. In 1897 it was acquired by Sir William Cecil Henry Domville (1849-1904) and, in 1906, by Anne Jump (c.1858-1926). In 1927 her son, Henry Jump, sold the 124-acre estate to George Gooday who intended to develop the land for housing. Sir Arthur Churchman (1867-1949) intervened and, having purchased the house and its park, presented them to the Borough of Ipswich as a public amenity. Churchman had been created a baronet, of Abbey Oaks in the parish of Sproughton, in 1917 and, in 1932, he was raised to Baron Woodbridge. Chantry Park was formally opened to the public in 1928 by the Princess Mary.

A large mansion standing in a fine park of about 124 acres. At one time the home of Sir Fitzroy Kelly, Baron of the Exchequer (1866-80). It was built in the eighteenth century but was considerably altered in the nineteenth century (1853-4) ('The Chantry'; NHLE, 1972).

- 3.15 The mansion stands in the centre of the park, towards the north boundary. The northern entrance front is of three storeys and five window range, with a pediment above a central part of three window range which breaks forward slightly. There are two-storey wings of one window range to both east and west, and a central 'porte-cochere' of two storeys. The southern garden front is of three storeys and nine window range, with a central two-storey bow of three windows. The east front has a pair of two-storey bays of three windows. A further two-storeyed wing of four window range extends to the west, beyond which was a stable yard and walled kitchen gardens.



Fig.11 The Chantry (1957)

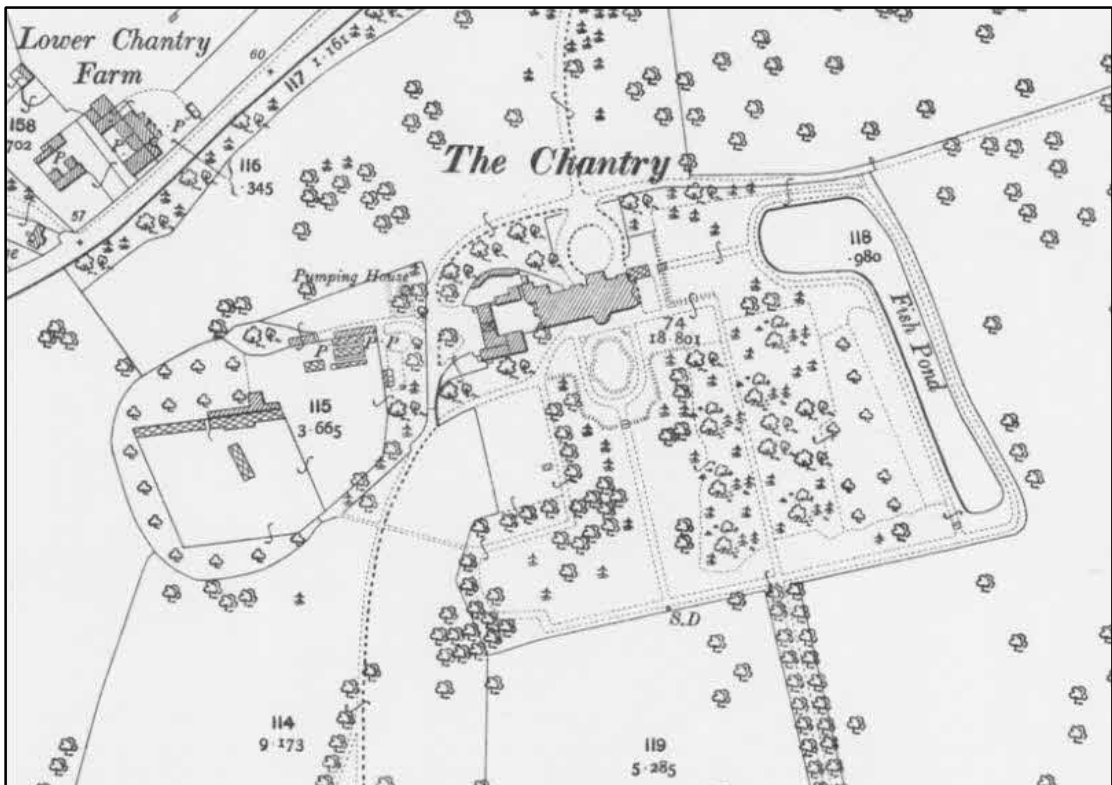


Fig.12 Detail of 1904 OSmap (revised 1902)

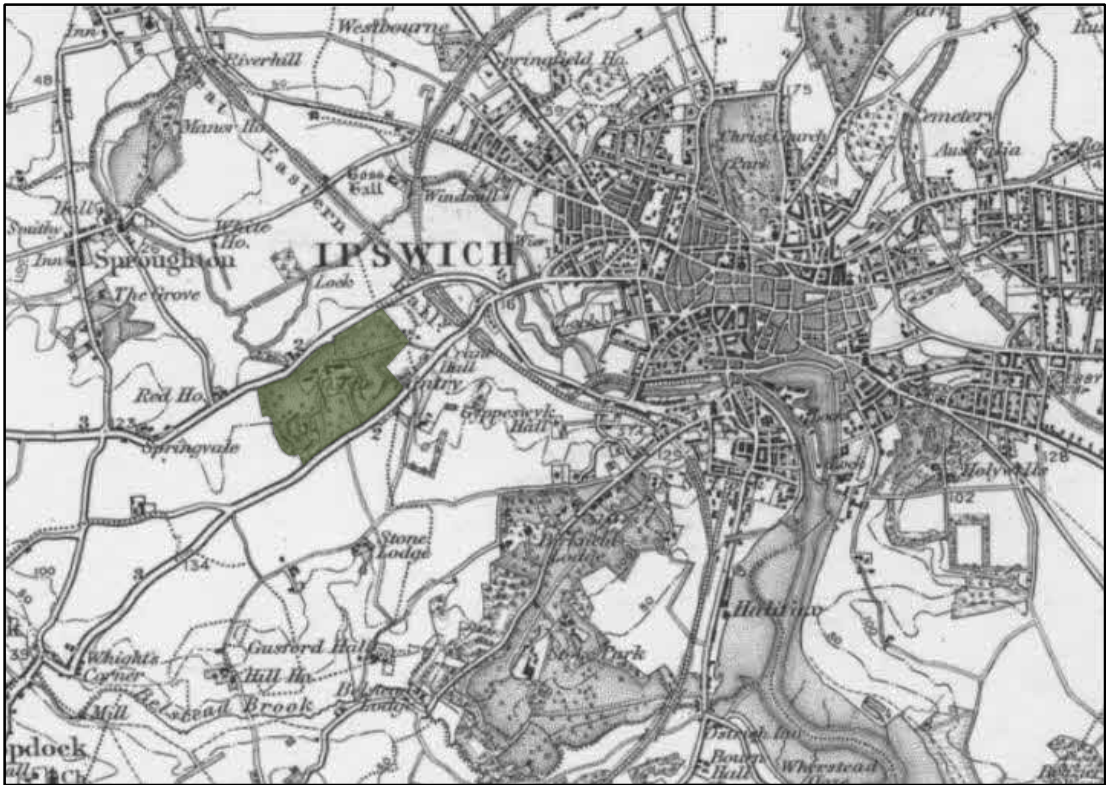


Fig.13 Detail of 1896 OS map showing relationship of park and town at end of C19

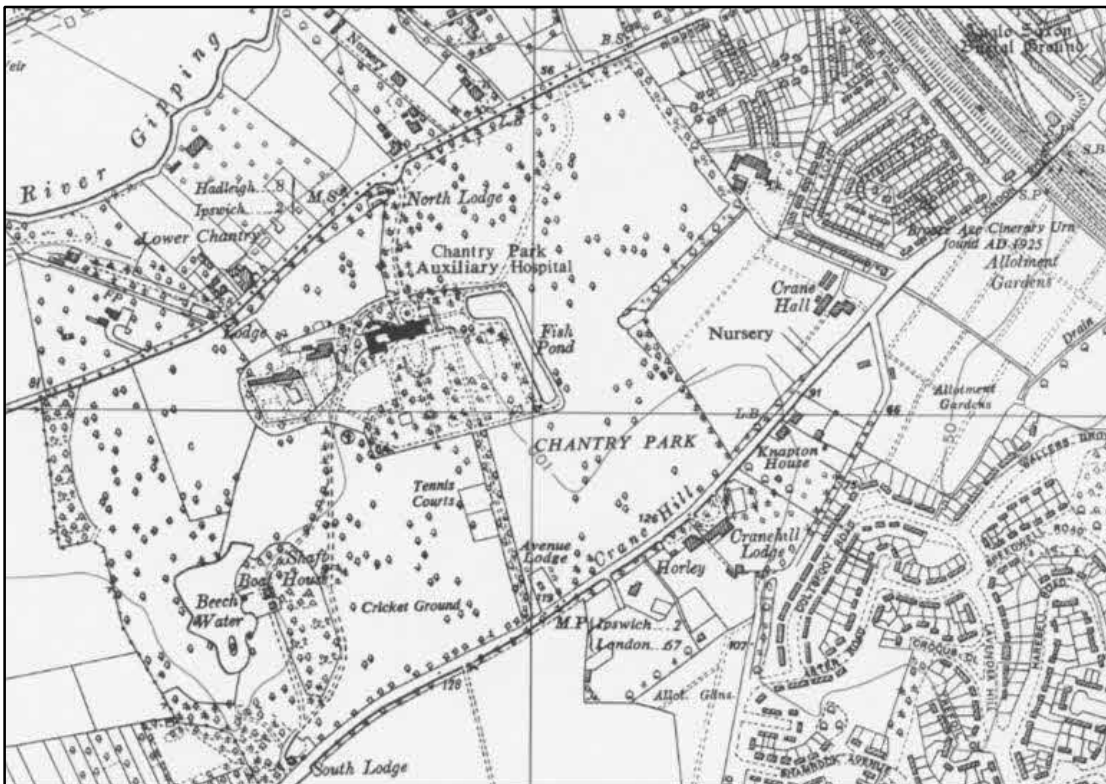


Fig.14 Detail of 1957 OS map showing expansion of town beyond railway line

- 3.16 The mansion known as 'The Chantry' therefore appears to have been built in the early eighteenth century by Edward Ventris. The estate was acquired by Metcalfe Russel in the late eighteenth century (c.1771) and he proceeded to alter the house (c.1772) and to lay out the park in that decade. Sir Fitzroy Kelly purchased the estate in the mid-nineteenth century (1852) and made alterations to the house and the pleasure grounds (c.1853-4). Sir Arthur Churchman saved the estate from being developed for housing in the early twentieth century (c.1927) and 'Chantry Park' was formally opened to the public in 1928.
- 3.17 Chantry Park lies to the west of Ipswich, to the south of the Gipping valley, and is bound on the north by Hadleigh Road and on the south by London Road. At the end of the nineteenth century the park remained separated from the town by both the river and, since the 1840s, by the railway line. However, the second and third quarter of the twentieth century witnessed the expansion of the town beyond the railway line such that housing now adjoins the park on three sides. Construction began to the east in the late 1920s and early 1930s, and carried on apace after the war on a much larger scale to the south of the park. The suburb known as 'Chantry' was formed in the late 1950s and 1960s. Chantry Park is now located on the western edge of the town and retains a sole border with the countryside.
- 3.18 Situated to the west of Chantry Park, in the vale of the surrounding farmland and on the line of a watercourse that discharges into the river Gipping, is a former farmstead known as Red House Farm. Robert Sage of Sproughton ('yeoman') died in 1582 and bequeathed land to his nephew, Thomas. At the core of the house is a late sixteenth century timber-framed building which would be consistent with a post-1582 date. Thomas Sage was named in a manorial court in 1672 as a former owner of the property and it is therefore probable that he is responsible for the original construction of the house.
- 3.19 Red House Farm was acquired in the early seventeenth century (c.1616) by John Revett (d.1627). The Revett family sold the 55-acre farm to Edward Gaell (d.1713) of Ipswich in 1684 and, following Edward's death, the farm was acquired by Thomas Woodward² of Sproughton (1715).

Message or tenement in Sproughton with all those pieces of freehold land and pasture called Cocks, Turpetts and Ordens, the Upper Orchard and Fullers Hancke, Turpitts Hills, Turpitts Meadows, Gills Croft, and two pieces of land heretofore called John Bulls land and Priors Meade, containing together 55 acres, in Sproughton, which said premises Edward Gaell of Ipswich purchased in 1684 (Conveyance of property to Thomas Woodward, 1715).



Fig.15 Red House (1967)



Fig.16 Red House Barn (1967)

- 3.20 Thomas Woodward¹ of Sproughton ('yeoman') died in 1702 and, in the same year, his son Thomas² (c.1671-1754) married Elizabeth Kettle (c.1682-1754). Thomas² acquired Red House Farm in 1715 and it would appear that he was responsible for the remodelling of the residence into a Georgian country-house in the early eighteenth century. Thomas Woodward² of Sproughton ('gentleman') resided at Red House Farm until his death in 1754. His widow, Elizabeth, also died that year and the property in Sproughton then passed to their only son, Thomas³.
- 3.21 Thomas Woodward³ (c.1715-96) does not appear to have occupied Red House and instead appears to have resided at Sproughton Hall. Thomas³ did increase the size of the estate with the purchase of Rivers Farm in 1745. In 1756 Red House was advertised as available to let and was described as 'a genteel, well-built brick-house, with a coach-house and stables'. The house appears to have been let for at least the remainder of the eighteenth century. Thomas Woodward³ of Sproughton ('gentleman') died in 1796 and the Red House Farm passed to his son, Thomas Woodward⁴ (c.1749-1833). The Red House was again advertised as available to let in 1798, with all enquiries to be made to Thomas Woodward⁴ of Sproughton Hall. The property was described as 'a brick and sashed dwelling-house, suitable for a genteel family, with a stable and coach-house'.
- 3.22 Thomas Woodward⁴ died in 1833 and the 93-acre estate passed to the Reverend Thomas Woodward⁵ (c.1784-1861). The Reverend Thomas⁵ occupied the Red House at the time of the tithe survey (1838), whilst the remainder of the holding was leased to a neighbouring farmer (John Ranson, c.1793-1860). The Reverend Thomas⁵ resided at the Red House until his death in 1861, during which period the farm premises were improved and alterations were made to the house, including the construction of a new kitchen wing at the east end of the building. The Reverend Thomas⁵ two spinster sisters, Elizabeth (d.1867) and Mary (d.1880), moved into Red House after his death and resided there for the remainder of their lives.
- 3.23 The property passed to Thomas Woodward⁶ (c.1827-90) of White Hall in Old Newton but, following his death in 1890, the family made the decision to sell their 181-acre estate at Sproughton. The estate by that date comprised 'three small farms', namely Red House Farm, Rivers Farm, and Lower Chantry Farm. Red House itself and its barn were held back from sale on that occasion, but formed part of a 30-acre holding that was placed for sale in 1904. The property was described as 'a red brick house, approached by a carriage drive, with stabling and two carriage houses, and a farmery which included a barn, granary, stables, horse and cattle sheds, and a covered yard'. The property was acquired by the sitting tenant, Robert Beaumont Bond (c.1859-1928), and he was responsible for the construction of the rear wing at the west end of the building in the early twentieth century.

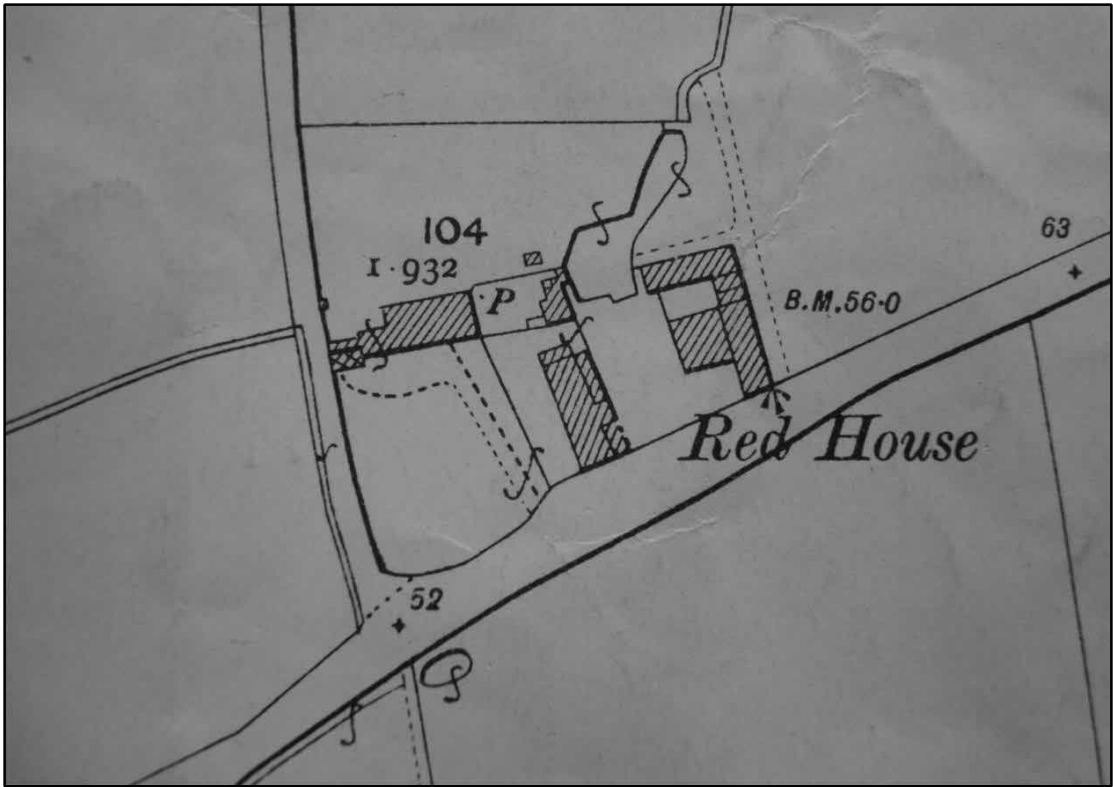


Fig.17 Detail of 1904 OSmap (revised 1902)

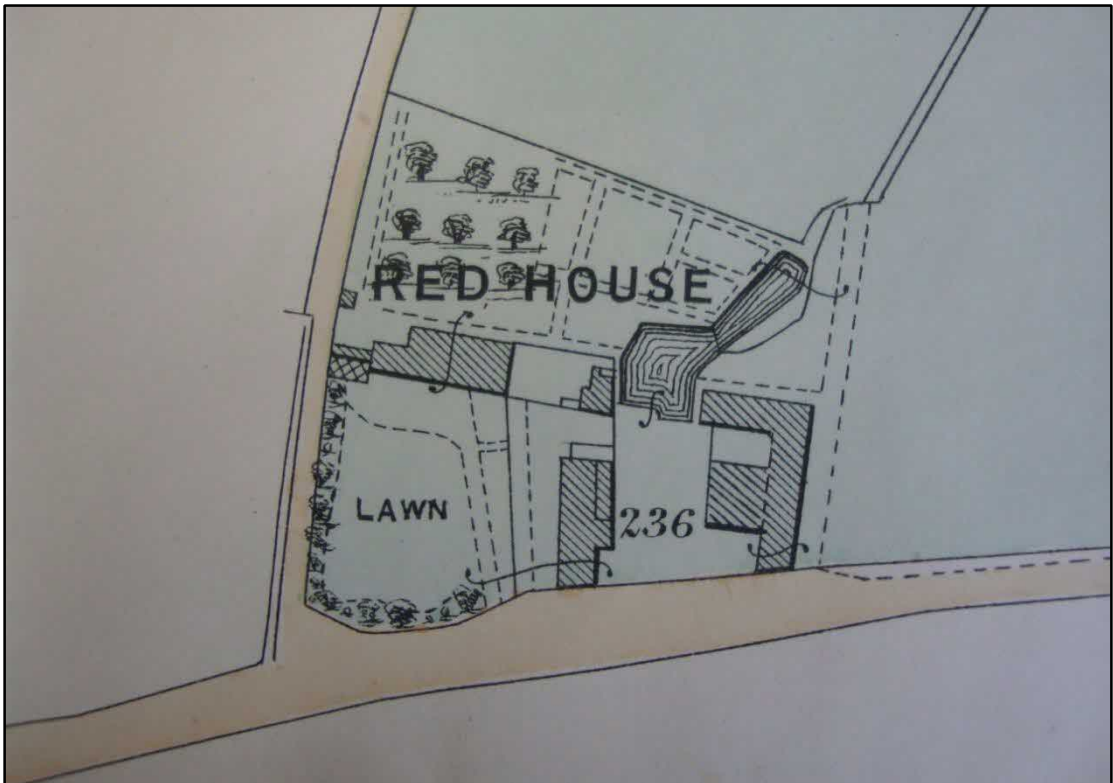


Fig.18 Detail of 1904 sale catalogue for Red House

- 3.24 Traditional farmsteads are an integral part of the rural landscape. Farm buildings served a function, with the most important being the storage and processing of crops and the shelter and management of farm animals. Courtyard plans were the most common form of layout and, in this instance, a separate working yard evolved to the east of the house. The yard was formed by the earlier barn on one side and by the later animal housing and shelter sheds on two sides. The seventeenth century barn was constructed in red brick and incorporated a stable and hay loft at its northern end, such was the multi-functional nature of farm buildings at that date. The barn section was subsequently used as a coach-house prior to the construction of the adjoining garage in the 1930s. The farmstead was typically 'improved' in the mid-nineteenth century with the construction of the inward-facing L-shaped range along the east side of the yard. The arrangement of open shelters and 'strawed-down' yards was later augmented by a covered cattle yard.
- 3.25 The main house stands back from Hadleigh Road and alongside Church Lane. The original timber-framed building possessed a typical three-cell plan which comprised a parlour to the west, a central hall with a cross-passage, and a service room to the east. The residence was remodelled in the early eighteenth century and now presents a red brick front with a series of tall window openings. Behind this façade lay the three principal rooms, namely a drawing room to the west, a reception hall in the centre, and a dining room to the east. The principal staircase and the kitchen were housed in a new range at the rear. The house was enlarged in the nineteenth century with the construction of a new kitchen wing at the east end of the building. An orchard and a kitchen garden were established at the rear, whilst the forecourt of the house was screened from the farm premises by a high wall.
- 3.26 Red House has its origins in the late sixteenth century and appears to have been built by Thomas Sage (post-1582). Thomas Woodward² acquired the property in the early eighteenth century (1715) and it would appear that he was responsible for the remodelling of the residence into a Georgian country-house. The residence was described as 'suitable for a genteel family' and would be owned by the Woodward family for the rest of that century and throughout the next (c.1715-1904). Both the house and the farm premises were improved whilst the Reverend Thomas Woodward⁵ resided at Red House, and the former farmstead may today be identified with the property that existed in the mid-nineteenth century.



Fig.19 Red House (1967)



Fig.20 Red House Barn (1967)

4.0 SETTING OF HERITAGE ASSETS

- 4.01 The Red House Farm of the Woodwards, the Chantry Park of Metcalfe Russel and Sir Fitzroy Kelly, and the site of the lost park and mansion of Robert Harland² have been identified as the heritage assets which would be most affected by the proposed land allocation. The significance of a heritage asset is derived not only from its physical presence but also from its setting, and the proposed land allocation may be said to be within the setting of these heritage assets.
- 4.02 Red House Farm stands in an area of ‘rolling valley farmland’ which is bordered by a small plateau on one side and by the valley floor of the Gipping on the other. The former farmstead reflects that which existed in the mid-nineteenth century following the improvements that were made to both the house and the farm premises. The farmstead stood remote from other buildings in an open and gently sloping rural landscape, surrounded by land in agricultural use, as remains today. The Chantry Park was laid out in the late eighteenth century within a rural setting on the edge of the plateau and with views over the Gipping. The expansion of the town in the second and third quarter of the twentieth century has resulted in housing now adjoining the park on three of its four sides, such that the park is now located on the western edge of the town and retains a sole border with the countryside. The plantation belt on the western boundary of the park was provided to screen the park from the world beyond and today provides a strong visual edge that separates the town from the surrounding countryside. The Harland mansion also stood within the vale before it was ‘pulled down’ in the 1790s. The parkland that surrounded the house then reverted to farmland in the early nineteenth century.
- 4.03 Setting is an established concept that relates to the surroundings in which a place is experienced, embracing both past and present relationships. The extent and importance of setting is often expressed by reference to visual considerations. Although views will play an important part, the way in which we experience an asset in its setting is also influenced by our understanding of the historic relationship between places. Setting can contribute to the significance of a heritage asset and it can allow that significance to be appreciated. Historic England recommends that an assessment should consider the physical surroundings of the asset, the asset’s intangible associations with its surroundings and patterns of use, and the way views allow the significance of the asset to be appreciated.

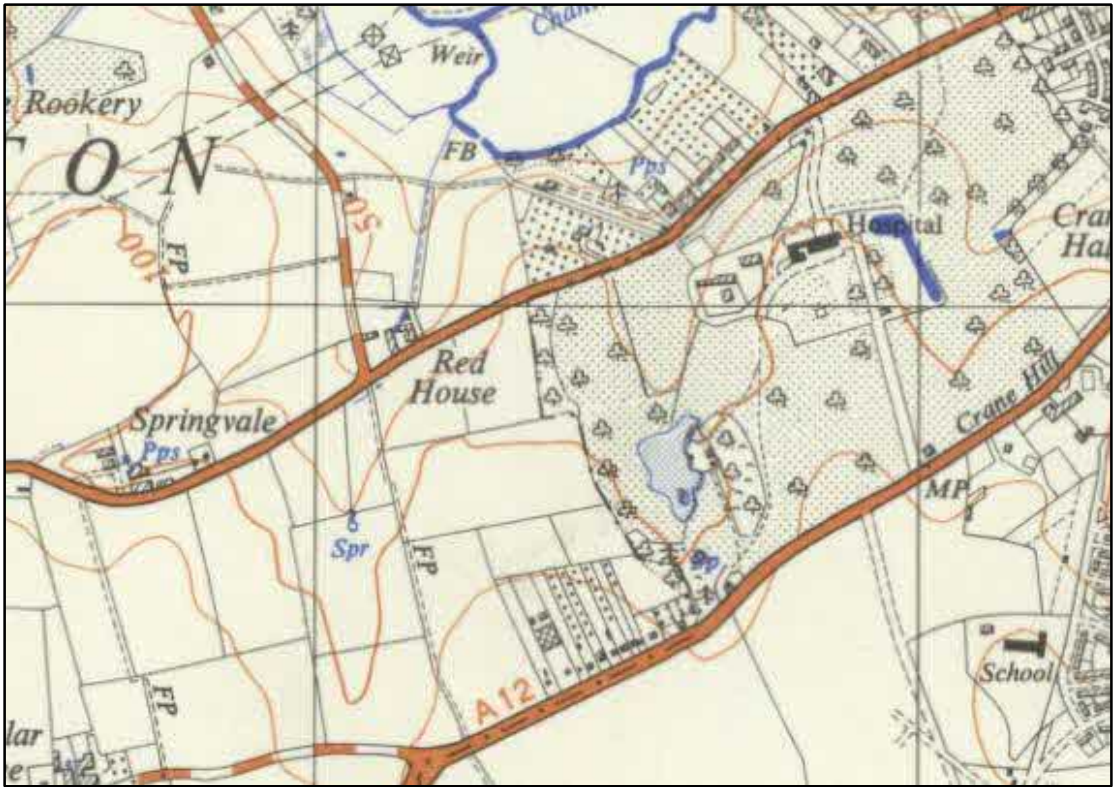


Fig.21 Detail of 1955 topographic map



Fig.22 Detail of 1838 tithe map showing extent of land associated with John Ranson

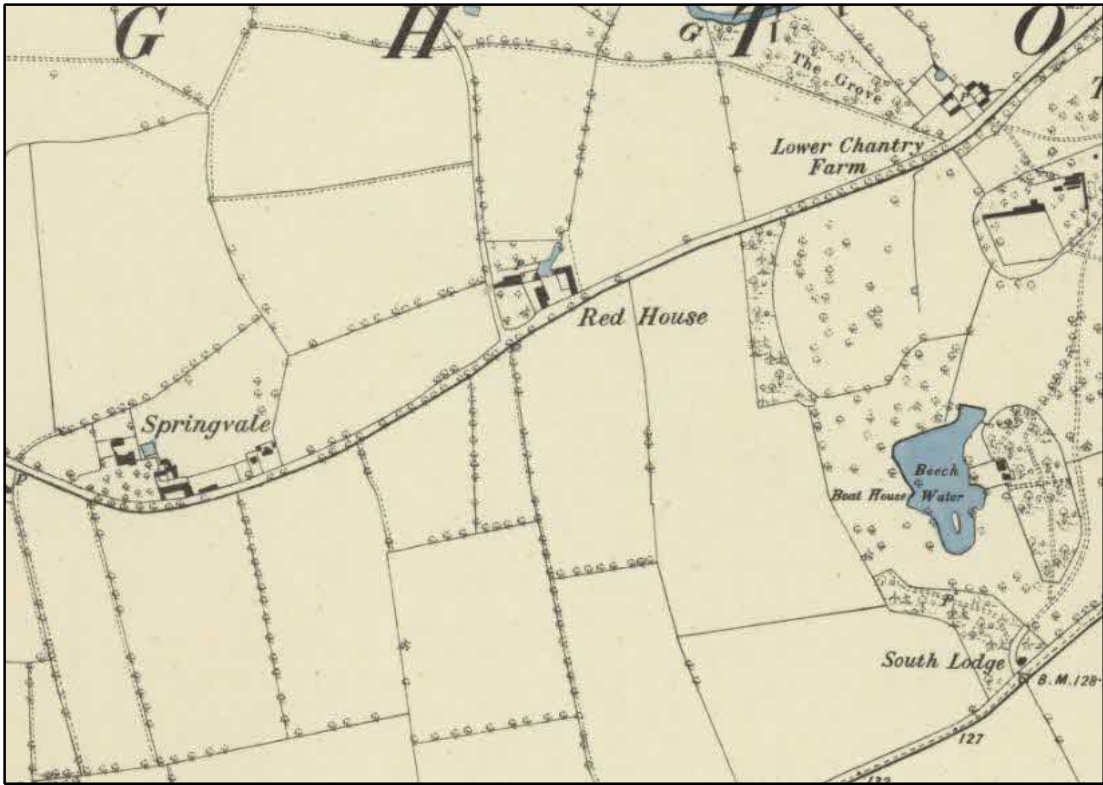


Fig .23 Detail of 1886 OS map (surveyed 1881)



Fig .24 Proposed allocation (1886 map)

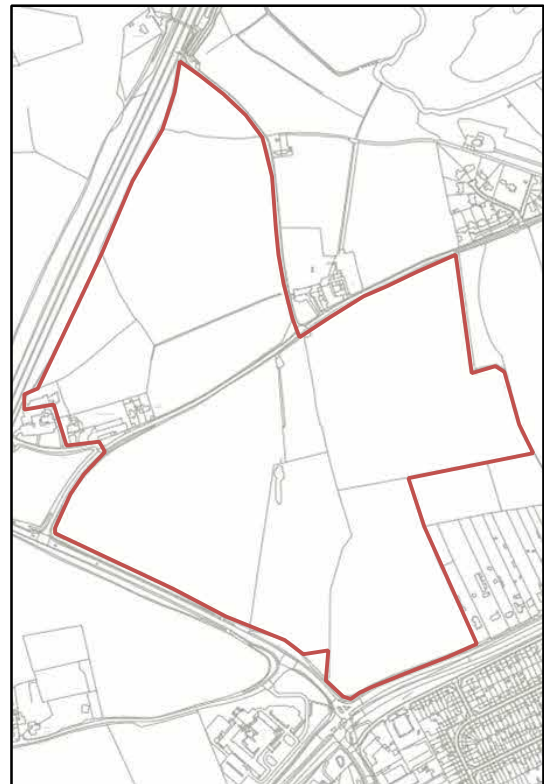


Fig .25 Proposed allocation (2019 map)

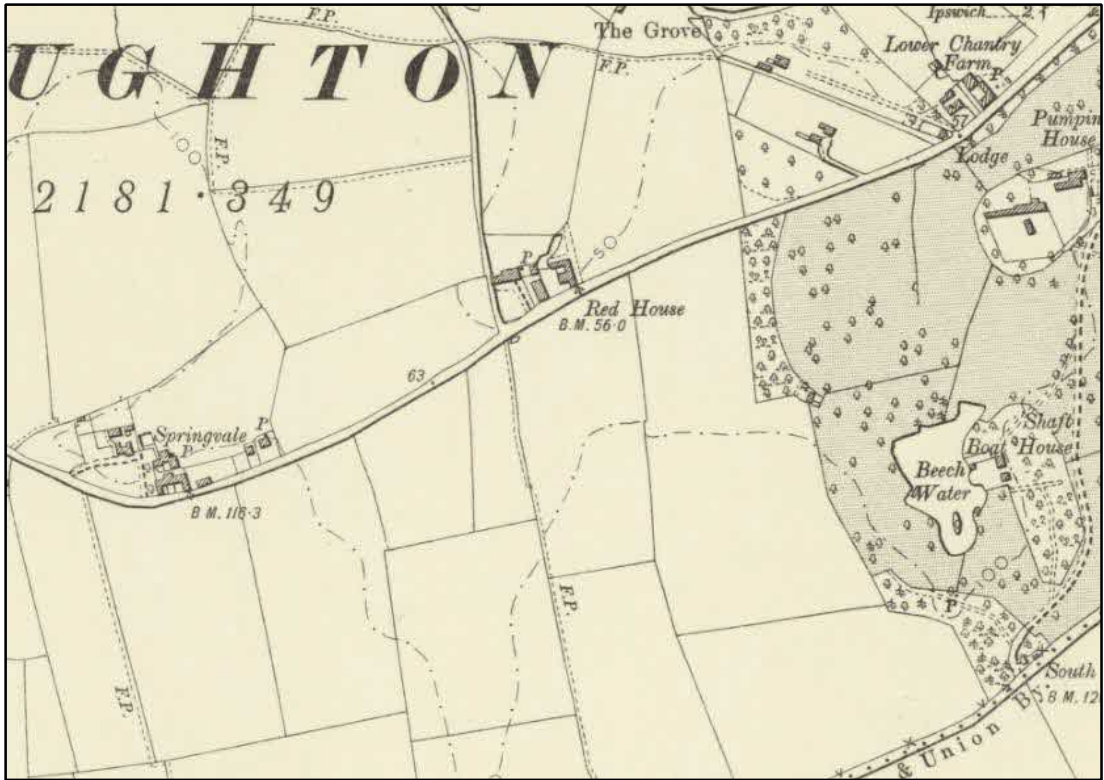


Fig.26 Detail of 1905 OS map (revised 1902)



Fig.27 Proposed allocation (1905 map)

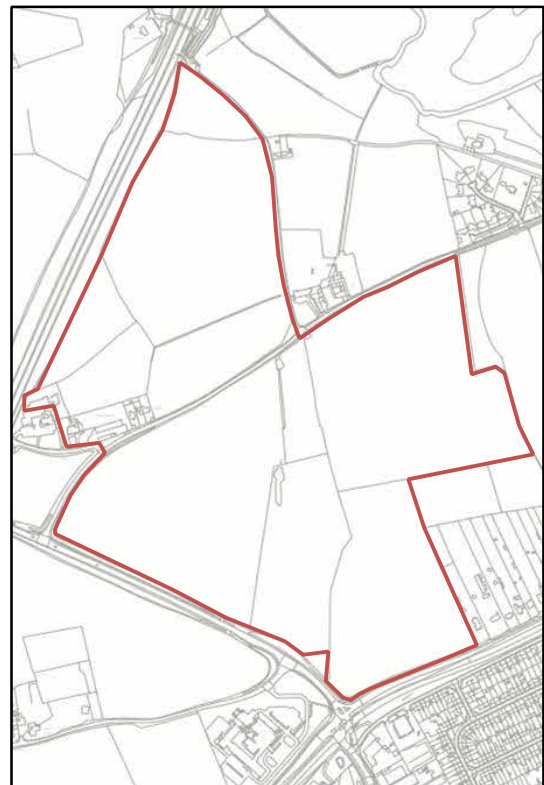


Fig.28 Proposed allocation (2019 map)



Fig.29 Detail of 1927 OS map (revised 1924)



Fig.30 Proposed allocation (1927 map)



Fig.31 Proposed allocation (2019 map)

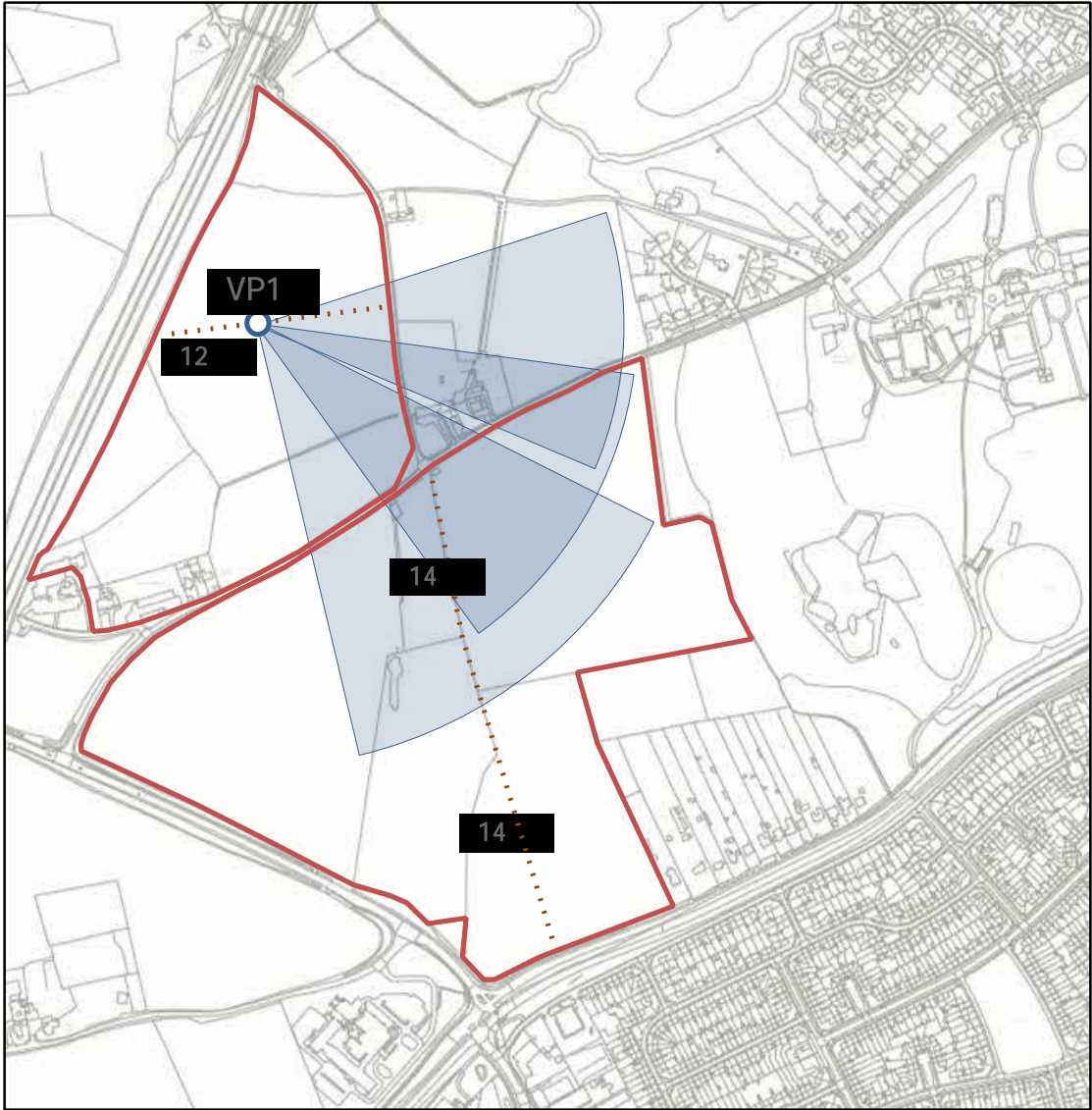


Fig.32 Views through landscape from public footpath no.12 (VP1)



Fig.33 Typical view from public footpath no.12 (VP1)



Fig .34 View E from public footpath no.12 (VP1)



Fig .35 View SE from public footpath no.12 (VP1)



Fig .36 View SSE from public footpath no.12 (VP1)

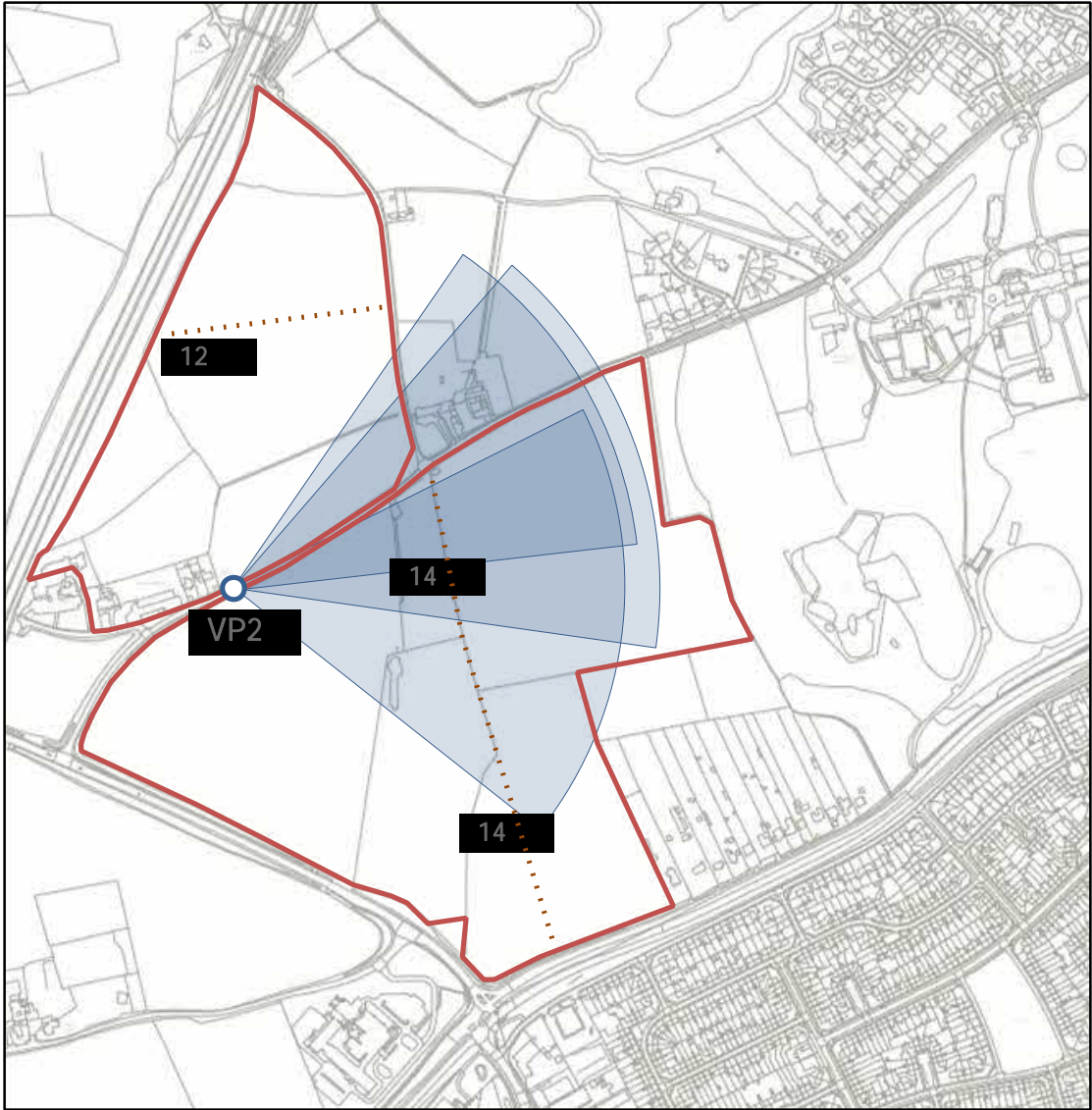


Fig.37 View through landscape from Hadleigh Road West (VP2)



Fig.38 Typical view from Hadleigh Road West (VP2)



Fig.39 View NE from Hadleigh Road West (VP2)



Fig.40 View ENE from Hadleigh Road West (VP2)



Fig.41 View E from Hadleigh Road West (VP2)

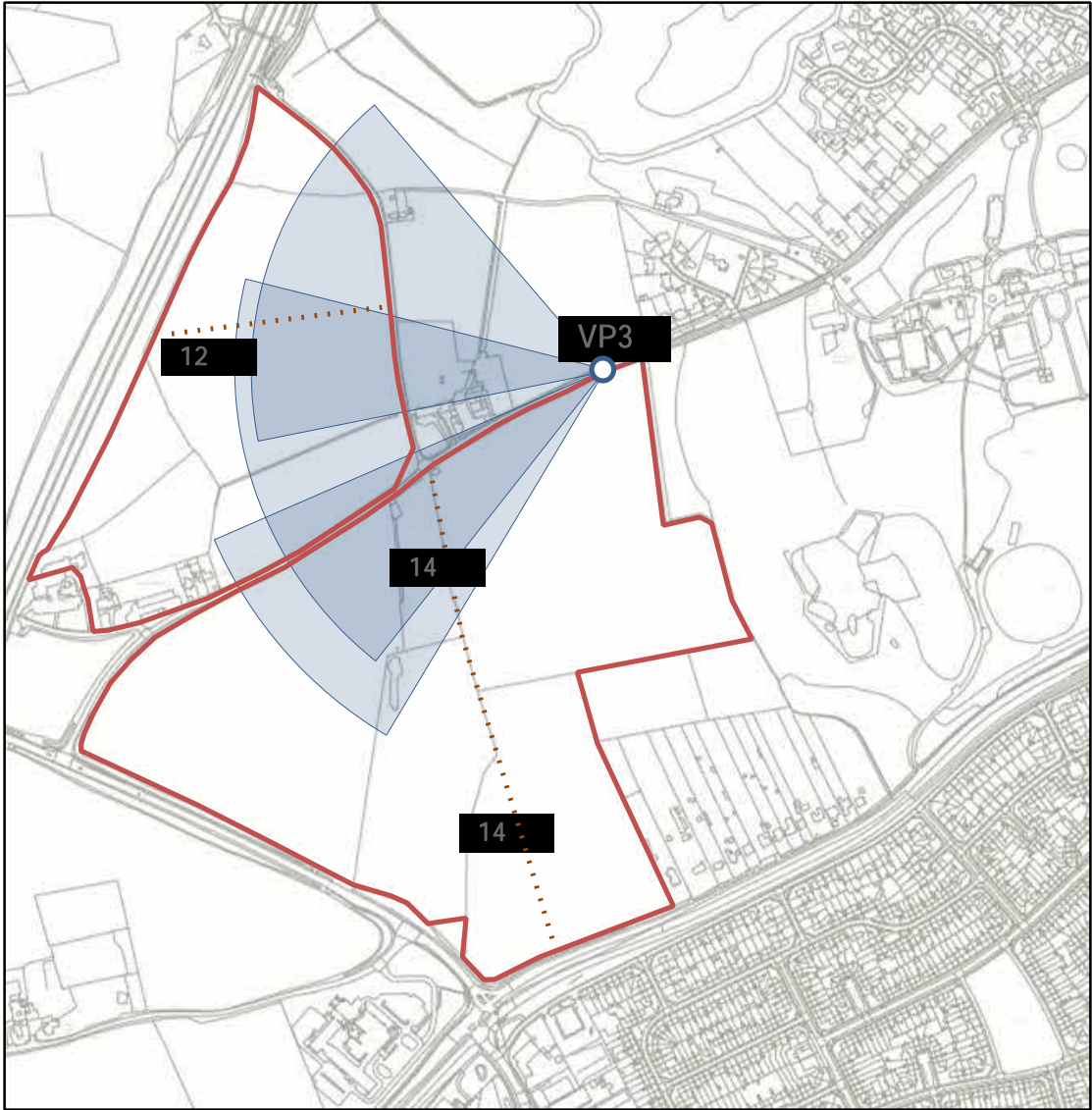


Fig.42 View through landscape from Hadleigh Road East (VP3)



Fig.43 Typical view from Hadleigh Road East (VP3)



Fig.44 View SW from Hadleigh Road East (VP3)



Fig.45 View WSW from Hadleigh Road East (VP3)



Fig.46 View WNW from Hadleigh Road East (VP3)

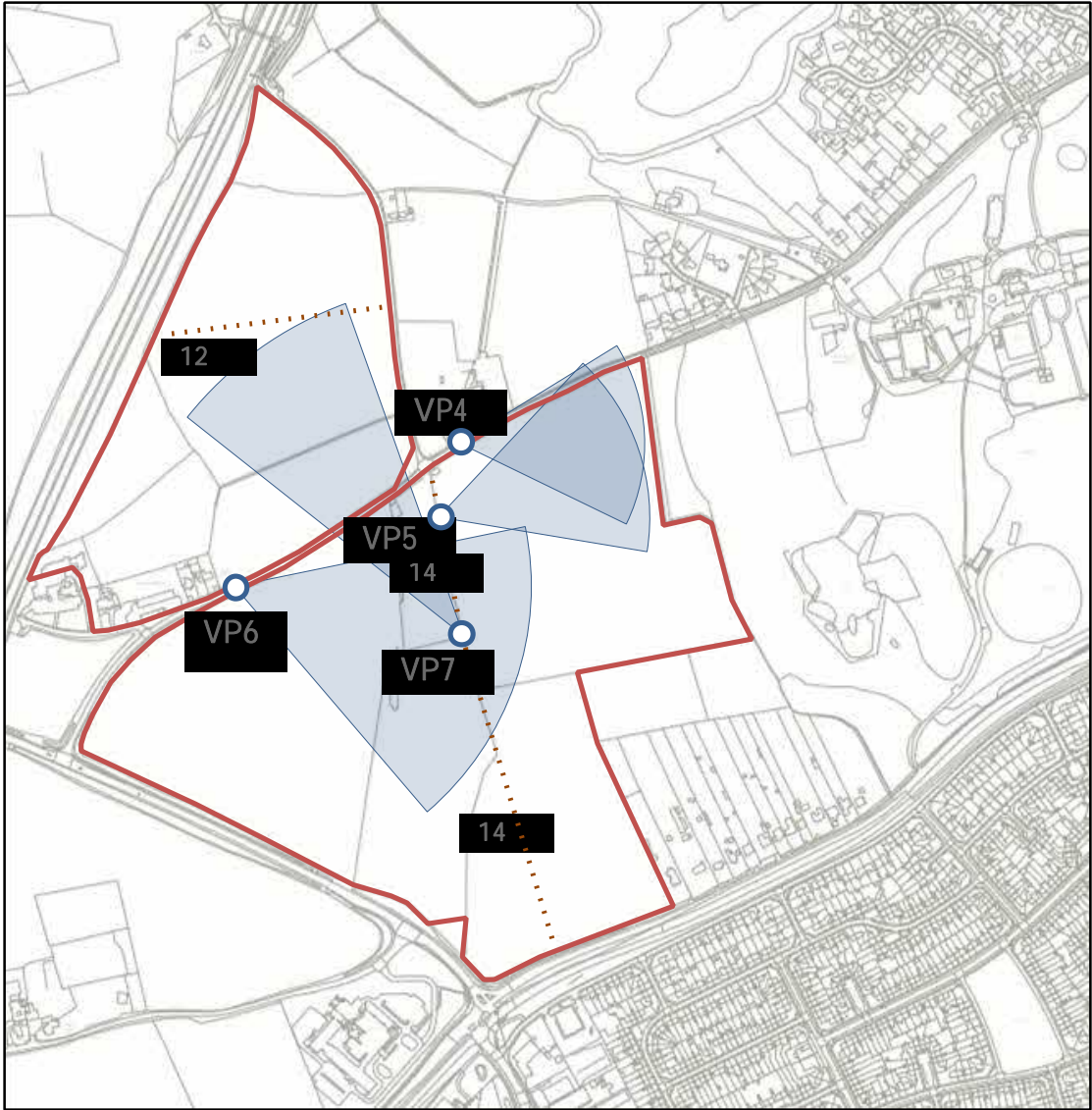


Fig.47 View of heritage asset from surroundings (VP4 - VP7)



Fig .48 View E from Red House (VP4)



Fig .49 View ENE from public footpath no.14 (VP5)



Fig .50 View ESE from Hadleigh Road West (VP6)



Fig .51 View N from public footpath no.14 (VP7)

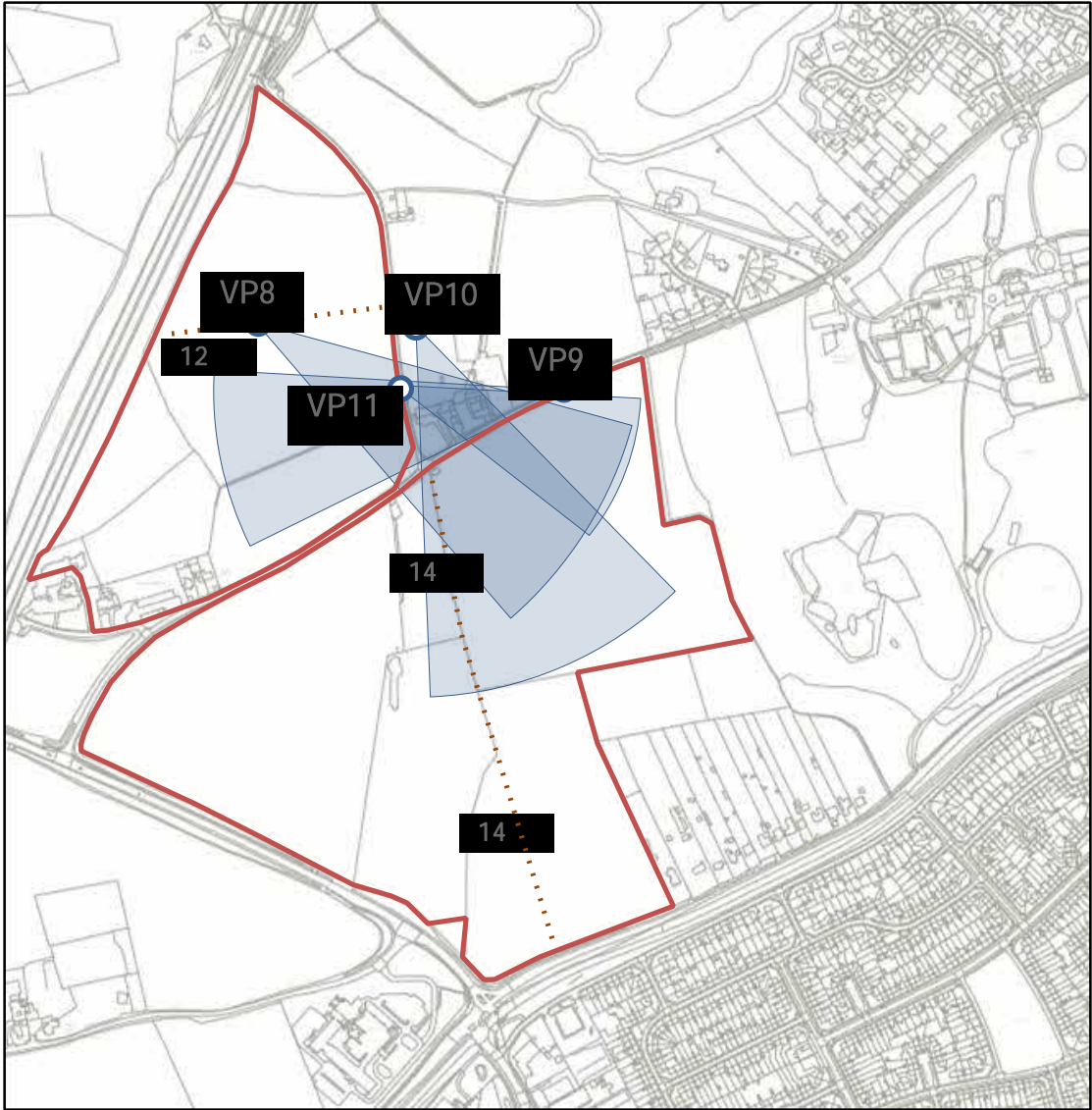


Fig.52 Backdrop to heritage asset (VP8 - VP11)



Fig.53 View SE from public footpath no.12 (VP8)



Fig .54 View W from Hadleigh Road East (VP9)



Fig .55 View SSE from grounds of Red House (VP10)



Fig .56 View ESE from Church Lane (VP11)

5.0 SIGNIFICANCE OF HERITAGE ASSETS

5.01 The significance of a place is the sum of its heritage values which may be evidential, aesthetic or historical. Evidential value derives from the physical remains that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal. Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place. Aesthetic values can be the result of the conscious design of a place or, equally, they can be the outcome of the way in which a place has evolved over time. Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. The historical value of places is not as easily diminished by change as evidential value. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.

Authenticity lies in whatever most truthfully reflects and embodies the values attached to a place ('Conservation Principles, Policies and Guidance for the sustainable management of the Historic Environment'; Historic England, 2008).

5.02 The Red House has its origins in the late sixteenth century. Thomas Woodward² acquired the 55-acre property in the early eighteenth century and it would appear that he was responsible for the remodelling of the residence into a Georgian country-house. The house would thereafter be owned by the Woodward family for the rest of that century and throughout the next. The Reverend Thomas Woodward⁵ came into possession of the 93-acre property in the early nineteenth century and during his tenure both the house and the farm premises were improved. The Red House Farm possesses evidential, aesthetic and historical value from, in particular, its original construction phase in the late sixteenth century, its remodelling in the early eighteenth century, and from its improvement in the mid-nineteenth century. Traditional farmsteads are an integral part of the rural landscape and the present-day building group and its surroundings reflect that which existed in the mid-nineteenth century. The former farmstead appropriately remains surrounded by land in agricultural use and remote from other buildings in an open and gently sloping rural landscape. These attributes contribute to the significance of the heritage asset and may be appreciated in views across the vale.

5.03 The mansion known as The Chantry has its origins in the early eighteenth century. Metcalfe Russel acquired the estate in the late eighteenth century and, in addition to altering the mansion, he laid out a landscape park around his country house in the 1770s. Sir Fitzroy Kelly, who was later raised to the bench as Lord Chief Baron of the Exchequer, purchased the estate in the mid-nineteenth century and he was responsible for the further alteration of the mansion. Kelly was also responsible for the construction of the gate-lodge

at the north entrance to the park and, with the involvement of the landscape architect W.A. Nesfield, the creation of the formal gardens on the south front. Sir Arthur Churchman saved the estate from being developed for housing in the early twentieth century and the park was formally opened to the public in 1928. Chantry Park possesses evidential, aesthetic and historical value from, in particular, the period when it was originally laid out in the late eighteenth century. Designed rural landscape parks are regarded to be among England's most important contributions to European civilisation. Chantry Park is now located on the western edge of the town and retains a sole border with the countryside. The plantation belt on the western boundary of the park ('Dovehouse Plantation') was typically provided to screen the park from the world beyond. The present-day tree belt provides a strong visual edge that both signifies the presence of the park and separates the town from the surrounding countryside. This boundary is now the park's last remaining link with its original countryside setting. These attributes contribute to the significance of the heritage asset and may be appreciated in views across the vale.

- 5.04 In the mid-eighteenth century Sir Robert Harland² 'partly rebuilt and greatly improved' the house which he had inherited from his father and which was imparked by the mid-1760s. Admiral Harland² was created 1st Baronet of Sproughton and was appointed Lord Commissioner of the Admiralty. The mansion was 'pulled down' in the 1790s and the parkland that surrounded the house had reverted to farmland by the 1830s. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. Heritage assets that comprise only buried remains may not be readily appreciated by a casual observer but they nonetheless retain a presence in the landscape and have a setting. The abandoned nature of the rural landscape contributes to the significance of the heritage asset in that it stimulates a connection with an earlier land use. The site also has archaeological interest in that it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- 5.05 The authenticity of a place lies in those attributes which most truthfully reflect and embody the heritage values attached to it. The farmstead being remote from other buildings and being surrounded by land in agricultural use, the countryside setting of the park and the plantation on its western boundary, the open and gently sloping rural landscape, and the abandoned site of the former mansion all contribute to the authenticity of the landscape. The roads and footpaths which cross the vale afford views that enable these attributes to be appreciated, and the rural landscape provides both an attractive approach into the town and an appropriate backdrop to Red House Farm.

6.0 PROPOSED LAND ALLOCATION

- 6.01 Babergh and Mid Suffolk District Councils are in the process of producing a Joint Local Plan (JLP) for the period 2018-36. A 'Strategic Housing and Economic Land Availability Assessment' (SHELAA) has been undertaken in order to establish whether sufficient land is available to meet housing need. Inclusion within the SHELAA does not confer any planning status upon the land and it remains for the JLP to determine which of those sites are the most 'suitable' to meet the identified housing need. The suitability of a site would be influenced by national planning policy and by other considerations including the potential impact of development on the historic environment.
- 6.02 The proposed land allocation in the Draft JLP was identified in the SHELAA as a pair of sites that is 'potentially suitable' for residential development on 'land north of the A1071'. Site SS0191 covers an area of 30.6 hectares and has an estimated yield of 600 dwellings. Site SS1024 covers an area of 15.8 hectares and has an estimated yield of 500 dwellings. The two sites cover a combined area of 46.4 hectares and have a combined estimated yield of 1,100 dwellings. The conclusions of the assessment are based on an understanding that part of site SS0191 was included within a previously approved scheme for 475 dwellings (ref. B/15/00993/FUL) and that there was no planning history for site SS1024. It is suggested in the SHELAA that there is a need for a more detailed assessment into the potential impact on heritage assets before the sites can be confirmed as suitable.
- 6.03 Sproughton has been classified as 'Babergh Ipswich Fringe' under the proposed settlement hierarchy of the Draft JLP and it is proposed that the Ipswich Fringe settlements will act as a focus for growth over the period of the Plan. The 'Preferred Options' consultation document (July 2019) proposes the allocation of land to the north of the A1071 in Sproughton for residential development. Site LA013 covers an area of 47.6 hectares and is proposed to yield 'approximately 1,100 dwellings' together with 'associated infrastructure' (LA013). The site specific policy states that any development should comply with 'the relevant policies set out in the Joint Local Plan' and further adds that there is a need to 'reflect the sensitivity of the site' and for any 'design, layout and landscaping' to be 'sympathetic to the close setting of heritage assets'.
- 6.04 A 'Sustainability Appraisal' (June 2019) has been produced to accompany the 'Preferred Options' consultation document. The report recognises that the historic environment is 'extremely sensitive to change' and can be 'severely affected by inappropriate development', and that meeting the housing need without causing harm to the historic environment represents 'a key challenge'. The sustainability appraisal (SA) confirms that conserving heritage assets and their settings should be an important objective of the Plan.

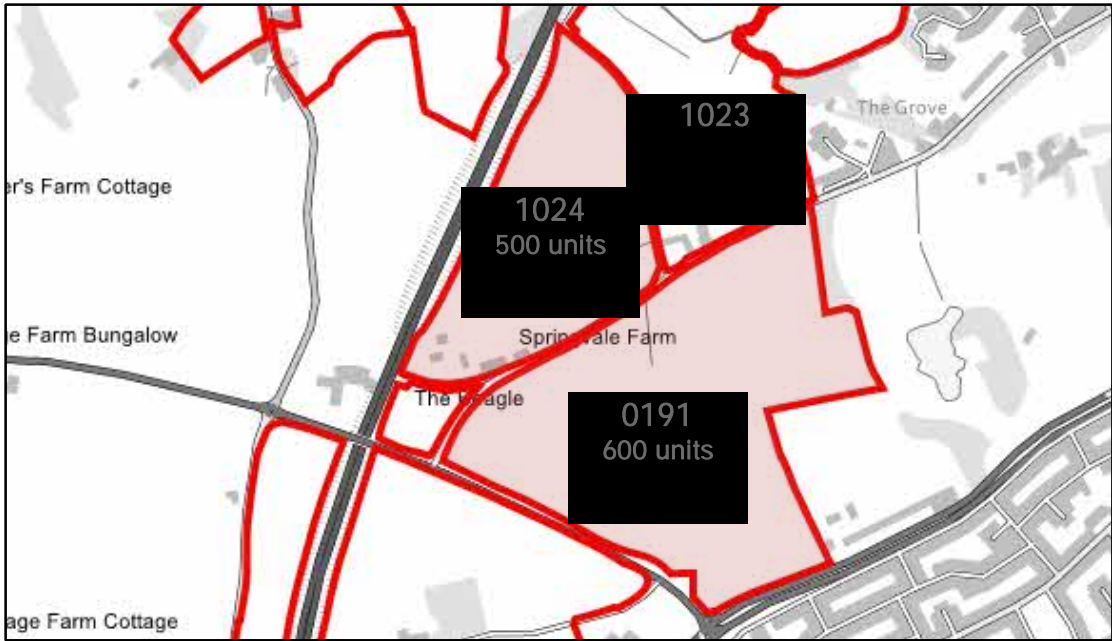


Fig .57 0191 and 1024 – Land north of the A1071, Sproughton (SHELAA, 2019)

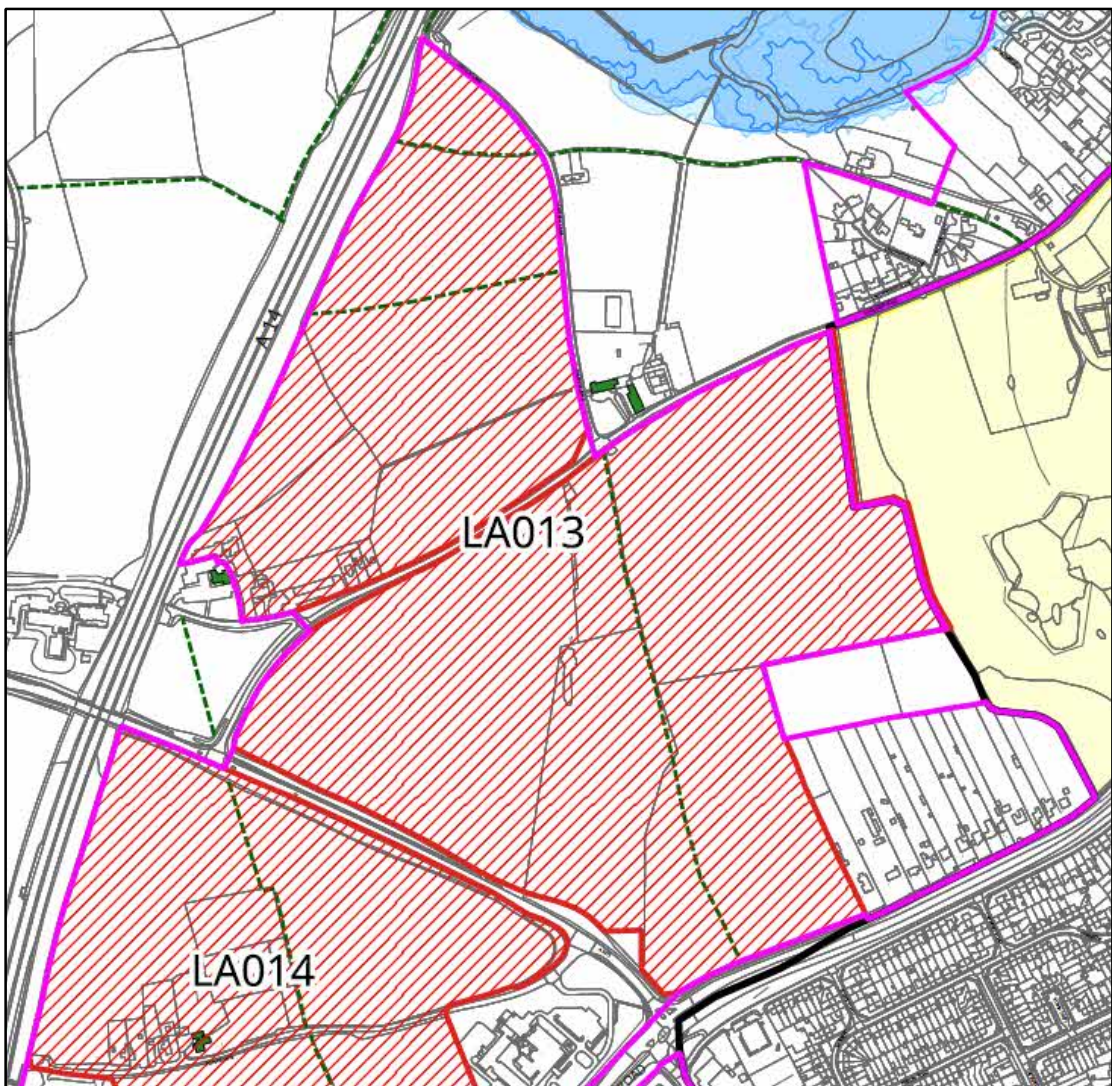


Fig .58 LA013 – Land north of the A1071, Sproughton (JLP Preferred Options, 2019)

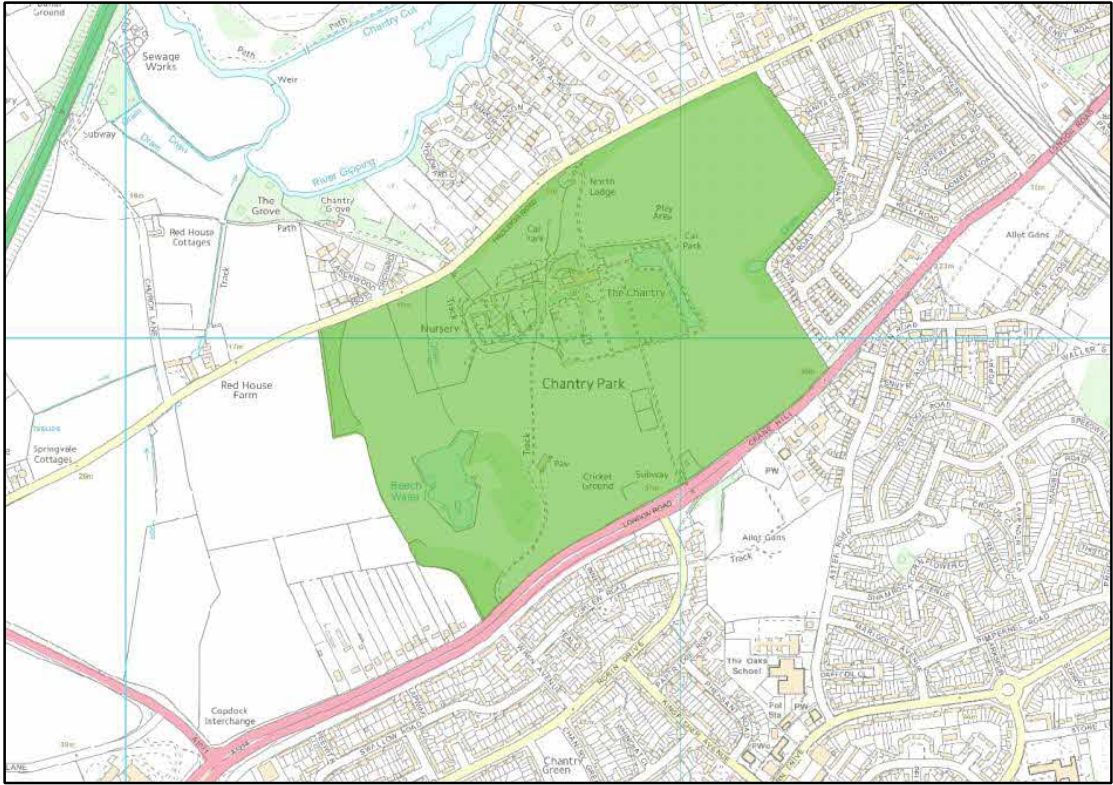


Fig .59 Registered park and garden (NHLE)



Fig .60 Landscape parks (Historic Landscape Characterisation)

- 6.05 The Ipswich Fringe Sites, including site LA013, have been appraised against the sustainability objective to 'conserve heritage assets and their settings' (SO12). The process asked whether the proposed site would have an impact on or harm the significance of a heritage asset? The appraisal concluded that the impact on heritage assets arising from the proposed residential development of site LA013 would be 'positive' ('no harm to the significance of a heritage asset or that mitigation of any potential harm was possible'). The appraisal noted that the site was 'adjacent to Chantry Park' and a pair of 'grade II listed buildings (Red House and Barn)' located 'approx. 55 metres north of the site'. The SA concluded that the proposed site specific policy for site LA013 would address all potential negative effects relating to the historic environment. The SA therefore made no recommendations for this policy.
- 6.06 Policy LP20 of the Draft JLP is the Council's preferred approach towards proposals affecting the historic environment. The policy provides that the Council will 'have regard or, where appropriate, special regard to the historic environment and take account of the contribution that any designated or non-designated heritage asset makes to the character of the area and its sense of place'. The policy adds that 'all designated and non-designated heritage assets must be conserved in accordance with their significance'.
- 6.07 Policy LP18 is the Council's preferred approach towards proposals affecting landscape. The policy provides that the Council will support development in 'suitable locations' which will 'not adversely affect the natural environment', having regard to 'landscape character sensitivity' and 'visual impacts of the proposal on the wider area'. The policy adds that the Council will support development that is 'sensitive to the landscape' and which 'integrates positively with existing landscape character'. The Council will support development that 'protects landscape value' and which is 'demonstrably informed by the Council's Landscape Guidance, the Suffolk Landscape Character Assessment and the Settlement Sensitivity Assessment'.
- 6.08 The purpose of the 'Babergh Landscape Guidance' (August 2015) is 'to secure development that will integrate into the landscape character of the area'. The document acknowledges that 'irreparable change to the character of the landscape' may be caused by the development of 'inappropriate locations'. The 'rolling valley farmlands' of the River Gipping have been identified as 'a landscape of the highest visual quality' and as having 'a wide zone visual impact'. The Council's aim is 'to retain the distinctive landscape character' of this area.
- 6.09 The 'Suffolk Landscape Character Assessment' (2011) identifies the 'rolling valley farmlands' as a sloping valley-side landscape that is largely associated with the rolling and undulating farmlands south of the river Gipping. Development in this landscape 'can have a profound visual impact' and 'the

setting of specific features of these landscapes, such as historic buildings, can be significantly damaged'. The assessment advises that 'settlement extension in a valley-side landscape is likely to have a significant visual impact and adversely affect the character of the landscape', and that 'large-scale expansion should be confined to the adjacent plateau'.

- 6.10 A 'Settlement Sensitivity Assessment' for the 'Landscape Fringes of Ipswich' was undertaken on behalf of Babergh District Council and others (Alison Farmer Associates, July 2018). The purpose of the assessment was to provide an analysis of the sensitivity to change of the Ipswich Fringe in order to inform the preparation of local plan policies and land use allocations.

The sensitivity of this area (to the west of the town) lies in its small scale river valley character, and in its natural and cultural heritage interest. The valley slopes are valued in providing a buffer and sense of perceived separation between the existing urban edge of Ipswich and the Gipping Valley. The valley sides around 'Red House' have a high sensitivity due to their intact rural character, visual connectivity to the wider landscape to the west and high visibility. This area acts as an important setting both to the Gipping Valley and to Ipswich. This landscape offers one of the most attractive approaches to Ipswich along the Hadleigh Road. The topography of the valley sides means that many areas of the valley are highly visible and provide an agricultural setting to the valley landscape. In particular, the open agricultural southern valley slopes in the vicinity of 'Red House' are visually prominent giving rise to a rural context to Ipswich and the River Gipping as well as reinforcing perceptions that this section of the Gipping Valley is separate from Ipswich ('Landscape Fringes of Ipswich'; Alison Farmer Associates, July 2018).

- 6.11 A 'Heritage and Settlement Sensitivity Assessment' (March 2018) was undertaken in order to provide the Council with up-to-date evidence about the historic environment which would then be used to inform the land allocation process. The assessment sought to establish the main characteristics of each historic settlement and its surrounding landscape, with particular emphasis being placed on key views. All assessments were undertaken with the purpose of identifying the potential impact both on the settlement as a whole and on the significance of individual heritage assets. The study did not include the historic settlement of Sproughton nor, in particular, that part of the parish on the edge of the town.

7.0 RESIDENTIAL DEVELOPMENT

- 7.01 The development of 'land to the south of the A1071' was approved in August 2018 ('Wolsey Grange 1'). Outline planning permission was granted for a mixed use development that included the construction of 475 dwellings (ref. B/15/00993). Full planning permission was also granted for the construction of 145 dwellings on part of the site and for the formation of an attenuation basin on the north side of the A1071. The 'hybrid' application had gained a resolution to grant permission in February 2016 and, in this context, Boyer Planning on behalf of Taylor Wimpey prepared a 'Vision Document' (November 2017) for the development of 'land to the north of the A1071' ('Wolsey Grange 2'). The site had previously been identified in the SHELAA (2017) as four separate areas of land (SS0191, SS0954, SS1023 and SS1024).
- 7.02 The stated purpose of the 'Vision Document' was to set out 'overarching principles' for a development that could deliver 600 dwellings and a new school. The document identified a constraint on the use of the land which exists in the form of a 22-acre restrictive covenant that was imposed on an area that surrounds Red House Farm. The document also identified the topography of the valley-side landscape. The inserted plan usefully depicted the valley slopes and the water-courses, and also the adjacent plateau which extends across the site at its southern end. This area of plateau abuts the London Road from which an inserted photograph was taken (see fig.63).
- 7.03 The 'Vision Document' included a conceptual drawing to illustrate how a development of 600 dwellings could be achieved on the 60.9 hectare site. The indicative layout notably provided an impression of the siting and the extent of the residential areas (yellow) that would be required for a development of 600 dwellings. In addition, the layout also provided an early understanding of both the siting and the individual size of a series of attenuation basins (blue) that would be required to serve the development. The layout also shows the attenuation basin to be sited on the north side of the A1071 to serve 'Wolsey Grange 1'.
- 7.04 In January 2019 the Council received a request from Boyer Planning for a 'screening opinion' ahead of an outline application for the construction of 800 dwellings and a new school (ref. DC/19/00454). The Council advised in February 2019 that an 'Environmental Impact Assessment' (EIA) would be required with such an application. In May 2019 the Council received a request from Boyer Planning for a 'scoping opinion' on the content of the required EIA (ref. DC/19/02571). The scoping report stated that 'the assessment of cultural heritage is a qualitative one and the evaluation of importance and effect is ultimately a matter of professional judgement'. The report identified that 'the potential impacts of the proposed development

upon buried archaeological assets, the historic landscape, and designated heritage assets' were issues which needed to be addressed. The report considered that, in EIA terms, the effects of the proposed development on relevant built heritage receptors would 'most likely' be of 'less than significant impact' and could be addressed by soft landscaping.

- 7.05 The Council had suggested in the 2017 SHELAA that three of the four sites owned by Taylor Wimpey could potentially yield 1,700 dwellings (SS0191, SS1023 and SS1024). This figure was obtained from the suggestion that site SS0191 could potentially yield 700 dwellings, with a further 500 dwellings being provided on each of the other two sites (SS1023 and SS1024). The Taylor Wimpey 'vision' (2017) instead proposed a development of fewer dwellings (600) across a larger area of land (60.9 hectares) that included all four sites (SS0191, SS0954, SS1023 and SS1024). Whilst the extent of the proposed site remained the same, the Taylor Wimpey 'screening' request (2019) suggested that the future application would propose 800 dwellings (SS0191, SS0954, SS1023 and SS1024). The 'scoping' request (2019) similarly proposed 800 dwellings, although site SS0191 has now been reduced in area.

Document	Author	Year	Land	Units
SHELAA	Babergh DC	2017	SS0191; SS1023; SS1024	1,700
Vision Document	Taylor Wimpey	2017	SS0191; SS0954; SS1023; SS1024	600
Screening Opinion	Taylor Wimpey	2019	SS0191; SS0954; SS1023; SS1024	800
Scoping Opinion	Taylor Wimpey	2019	SS0191; SS0954; SS1023; SS1024	800
SHELAA	Babergh DC	2019	SS0191; SS1024	1,100
Preferred Options	Babergh DC	2019	SS0191; SS1024	1,100
Public Exhibition	Taylor Wimpey	2019	SS0191; SS0954; SS1023; SS1024	800

Fig.61 Comparison of site area and estimated yield

- 7.06 The Council have suggested in the 2019 SHELAA that two of the four sites owned by Taylor Wimpey could potentially yield 1,100 dwellings (SS0191 and SS1024). This figure was obtained from the suggestion that site SS0191 could potentially yield 600 dwellings, with a further 500 dwellings being provided on site SS1024. The Council had previously suggested that 700 dwellings could be provided on site SS0191. The other two sites (SS0954 and SS1023) have not been included. The publication of the JLP consultation document in July has revealed that the Council's 'preferred option' (2019) is for 46.4 hectares of land (SS0191 and SS1024) to be allocated for residential development in the emerging Local Plan. The Council has suggested that this allocation could potentially yield 1,100 dwellings (policy LA013).
- 7.07 In September 2019 Taylor Wimpey held a public consultation event for 'Wolsey Grange 2' which announced that an outline application for 800 dwellings would be submitted to the Council in late 2019.



Fig.62 Topography of the 'Wolsey Grange 2' site (Boyer, November 2017)



Fig.63 View north across plateau from London Road (Boyer, November 2017)

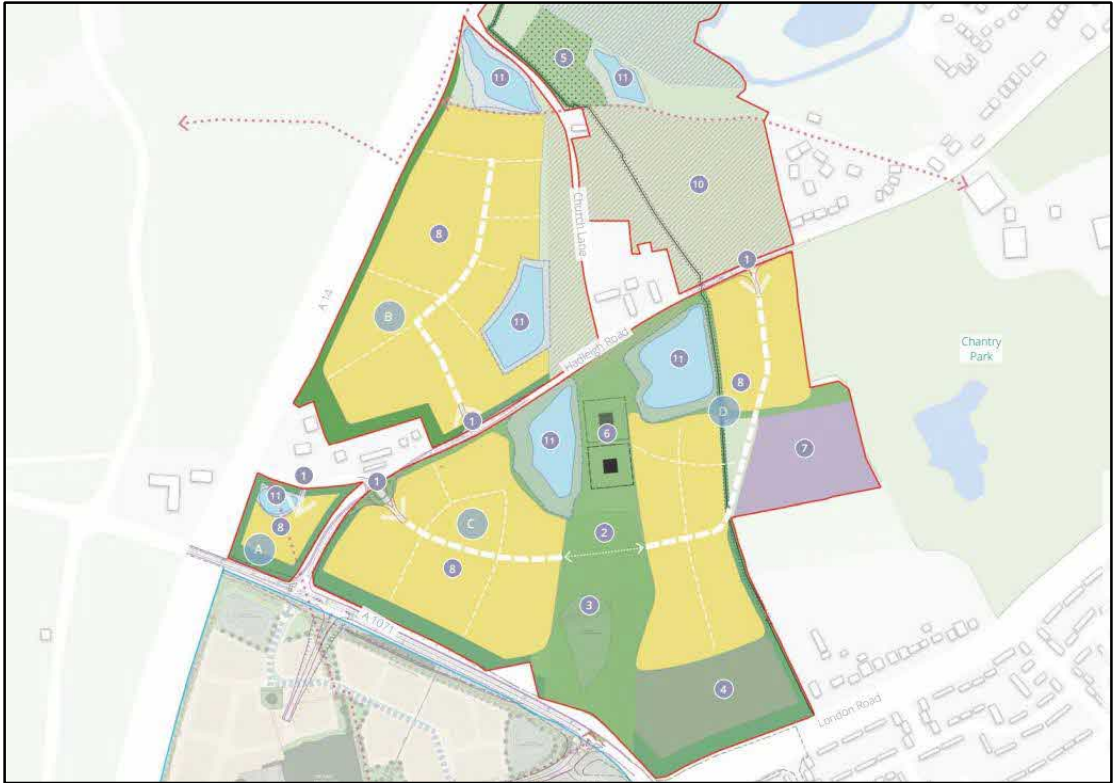


Fig.64 Conceptual drawing of 'Wolsey Grange 2' (Boyer, November 2017)

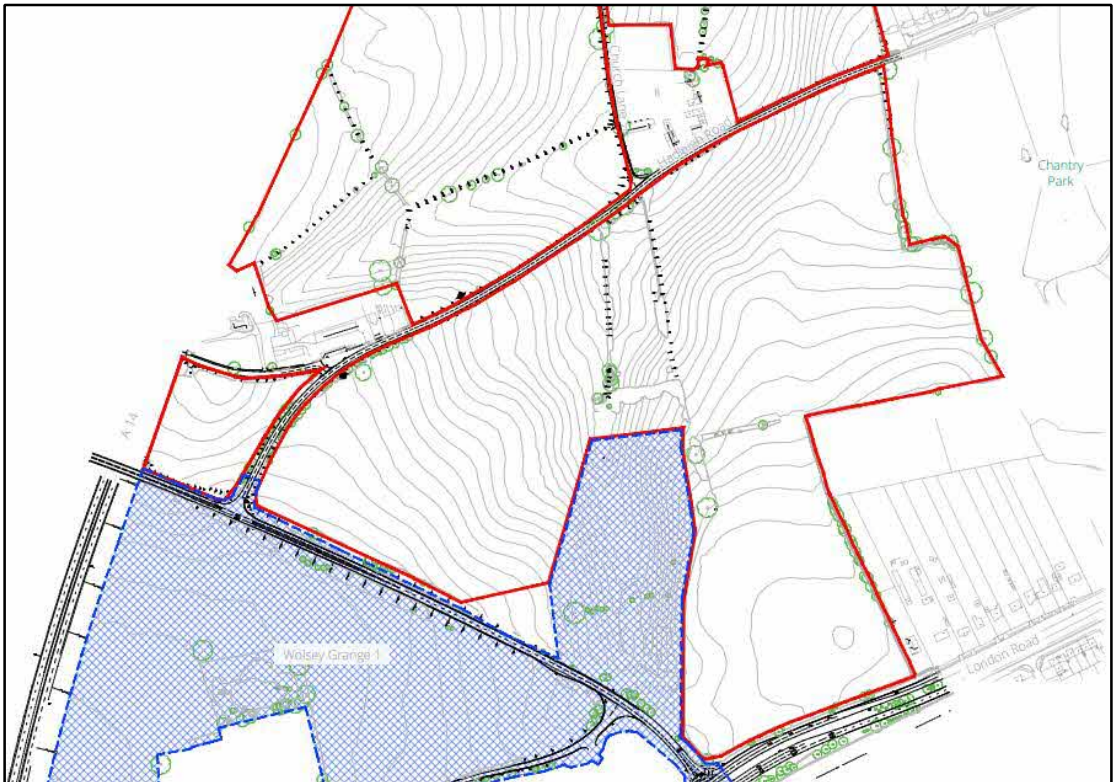


Fig.65 Reduced site area for Scoping Report (Boyer, May 2019)

8.0 CHANTRY VALE APPEAL DECISION

- 8.01 An application for outline planning permission for a mixed use development on land between the A45 bypass and Chantry Park was submitted to the Council in 1986 (ref. B/1144/86). The 72-hectare site in Sproughton was referred to as 'Chantry Vale' and covered an area of land 'to the south of the River Gipping, to the east of the A45 bypass, to the north of the London Road, and to the west of Chantry Park'. The site was crossed 'by the A1071, Hadleigh Road and Church Lane'. The proposed development, which included the construction of 1,600 dwellings, was refused permission by the Council in May 1987. Wilcon Homes lodged an appeal against the decision which was heard at a Public Inquiry in late 1987 and which was subsequently dismissed in early 1988.

The application involves the carrying out of development which would break through a strong existing visual edge to Ipswich into an area of attractive countryside the environment of which would be unacceptably disturbed. In addition, a number of significant views into the area would be seriously and adversely affected (reason 3 of Council's refusal notice).

There are fundamental considerations which make the site unacceptable for development. These relate principally to the attractive landscape that provides a natural rural edge to the town (extract from Council's opening statement at Public Inquiry).

The intrusion of development through the town's strong visual edge into an attractive area of open countryside, causing harm to a number of significant views (Appeal Inspector's summary for reason 3 of Council's refusal notice).

The highest part of the site is to the south from where it falls in undulating form towards the Gipping valley to the north. A pronounced dry valley cleaves the site from north to south and a secondary cross valley extends from Springvale down to Red House Farm. The site is in active agricultural use, mainly under arable cultivation with areas of pasture besides the River Gipping and along the north-south dry valley (extract from Appeal Inspector's description of site).

Extensive views of the southern part of the Chantry Vale site are obtained from the A1071 when approaching from the west. Seen from this approach, the trees bordering Chantry Park are a prominent feature on the skyline (extract from Appeal Inspector's description of site).

The Chantry Vale appeal site comprises a substantial area of attractive, open rolling farmland. Its topography makes it prominent to view and its landscape features make a significant contribution to the attractive approach to Ipswich from the west. It also affords attractive views from other roads and footpaths which surround and cross the site. Much of this scenic quality is due to the notable tree screen which borders the eastern side of the site. The general

effect is of open countryside extending unbroken across the site and up to the very edge of the town. The existing edge of the town is well defined by the strong line of trees along the eastern site boundary. The feeling of remoteness is helped by the strong tree screen which hides the presence of the town (extract from Appeal Inspector's conclusions).

The large and prominent tract of open countryside is of considerable landscape quality and contributes significantly to the attractive appearance of the urban fringe on this important approach to Ipswich. This open land also plays a vital role in protecting the separate identity of Sproughton village (extract from Appeal Inspector's conclusions).

The proposed development would extend housing beyond the wooded perimeter of the town into the open countryside. Housing would cover the slopes rising from the Gipping Valley which are exposed to view. Landscaping would not compensate for the loss of the fine views which are now enjoyed into and across the site. The setting of the listed buildings at Red House Farm would be seriously harmed (extract from Appeal Inspector's conclusions).

The existing edge of the town is well defined by the strong line of trees along the eastern site boundary and there seems to be no justification for extending the urban area out to the line of the by-pass. In my judgement, these represent strong and clear-cut objections to the proposed development (extract from Appeal Inspector's conclusions).

In assessing the weight to be given to the objections I have identified, I place the greatest emphasis on those interests of acknowledged importance which would suffer permanent and irreparable harm. Foremost among these is the loss of the large and prominent tract of open countryside of considerable landscape quality which contributes significantly to the attractive appearance of the urban fringe on this important approach to Ipswich. This open land also plays a vital role in protecting the separate identity of Sproughton village. The development of some 1,600 houses on the site, however sympathetically designed, would result in irreparable harm to those characteristics on which I place a very high value. The development would also detract markedly from the setting of Red House Farm. In my judgement, the benefits associated with the proposed development would not compensate for its adverse effects (extract from Appeal Inspector's conclusions).

9.0 IMPACT OF PROPOSAL ON SIGNIFICANCE

- 9.01 An understanding of the contribution to significance made by setting provides a baseline for considering the effects of a proposal. The authenticity of a place lies in those attributes which most truthfully reflect and embody the heritage values attached to it. It has been established that both the building group and the surroundings of Red House Farm today reflect that which existed in the mid-nineteenth century. The proposed allocation of the land for residential development would, however, result in the former farmstead no longer being surrounded by land in agricultural use, nor would it stand remote from other buildings in an open and gently sloping rural landscape. Chantry Park was designed as a rural landscape park in the late eighteenth century and it now retains a sole border with the countryside. The proposed land allocation would, however, mean that the plantation belt on the western boundary of the park would no longer provide a strong visual edge, whilst the park itself would lose its last remaining link with its original countryside setting. The landscape was also once the site of another mansion set within its own park. The proposed land allocation would, however, result in the loss of the abandoned nature of the landscape thereby eroding the ability to connect with the earlier land use. The roads and footpaths which cross the vale afford views that enable these attributes to be appreciated. The proposed land allocation would either result in the loss of the attribute or in the inability to appreciate the attribute from the viewing point.
- 9.02 Heritage assets may be affected by direct physical change or by change in their setting. The Red House Farm of the Woodwards, the Chantry Park of Metcalfe Russel and Sir Fitzroy Kelly, and the site of the lost park and mansion of Robert Harland² have been identified as the heritage assets which would be most affected by the proposed land allocation for residential development. Not all settings have the same capacity to accommodate change without harm to the significance of a heritage asset or the ability to appreciate it. The combined landscape setting of the Red House Farm and Chantry Park, which also includes the remains of the Harland seat, is highly sensitive to development. The assessment has determined that the proposed land allocation for the construction of 1,100 dwellings would result in varying degrees of harm to the significance of the identified heritage assets. In the case of Red House Farm, the adverse impact upon the setting of the farmstead would seriously affect a key element of its special architectural or historic interest.
- 9.03 Alison Farmer, the author of the Council's sensitivity assessment for the 'Landscape Fringes of Ipswich' (July 2018), was commissioned to assess the potential impact of the proposed land allocation ('Landscape Appraisal', September 2019). The report stated that the site was 'highly sensitive' and

that issues were previously raised in the earlier study which, as part of the Council's evidence base, was intended to inform the land allocation process.

One of the key sensitivities is the isolated location of Red House and the importance of the rural landscape in providing an unspoilt and intact setting to this heritage asset. No amount of mitigation planting will address the fundamental change to the rural character of the valley landscape which forms the setting and context to Red House. Due to the sensitivity of the land surrounding Red House, it is not possible for site LA013 to accommodate development without conflicting with policy LP18 ('Landscape Appraisal'; Alison Farmer Associates, September 2019).

- 9.04 The author of this report concurs with the 2019 'Landscape appraisal' in that part of the site does appear to have the capacity to accommodate residential development. The area of plateau that abuts the London Road provides an opportunity for housing that can be associated with the existing urban edge and which can be mitigated through edge planting that can protect the valley landscape from the visual intrusion of development. This approach would be in accordance with landscape guidance that forms part of the Council's evidence base.
- 9.05 The conceptual drawing contained within the 2017 'vision' suggested a series of attenuation basins would be required to serve a development of 600 dwellings. Such a proposal would, by itself, have an adverse impact upon the setting of the farmstead through the loss of surrounding fields and the resultant appearance of an engineered landscape (see fig.67). In addition, such a proposal would introduce a risk of flooding to the heritage asset. JPC Environmental Services were commissioned to review the catchment hydrology and other drainage related matters with respect to the proposed land allocation (July 2019).

Large scale alterations to the valley would cause significant changes to the movement of surface water throughout the landscape. Surface water runoff should be reduced to mimic the green-field scenario both in terms of volume and discharge rate. Preliminary calculations (based on 600 dwellings) suggest that this would require in the order of 25,000 to 30,000 cubic metres of storage. Any increase in housing density or the proposed number of dwellings would result in an increase in the required storage volume. The sides of the valley are steep in places and above ground storage of surface water would require significant quantities of cut and fill to create the required areas. The risk of storing large water quantities in this way has the potential to significantly increase the risk of flooding from artificial sources to properties downstream. It is our considered opinion that there are significant risks associated with such an extensive development in this location ('Review of catchment hydrology and other drainage related matters'; JPC Environmental Services, July 2019).



Fig .66 Proximity of attenuation basins to Red House Farm (Boyer, November 2017)

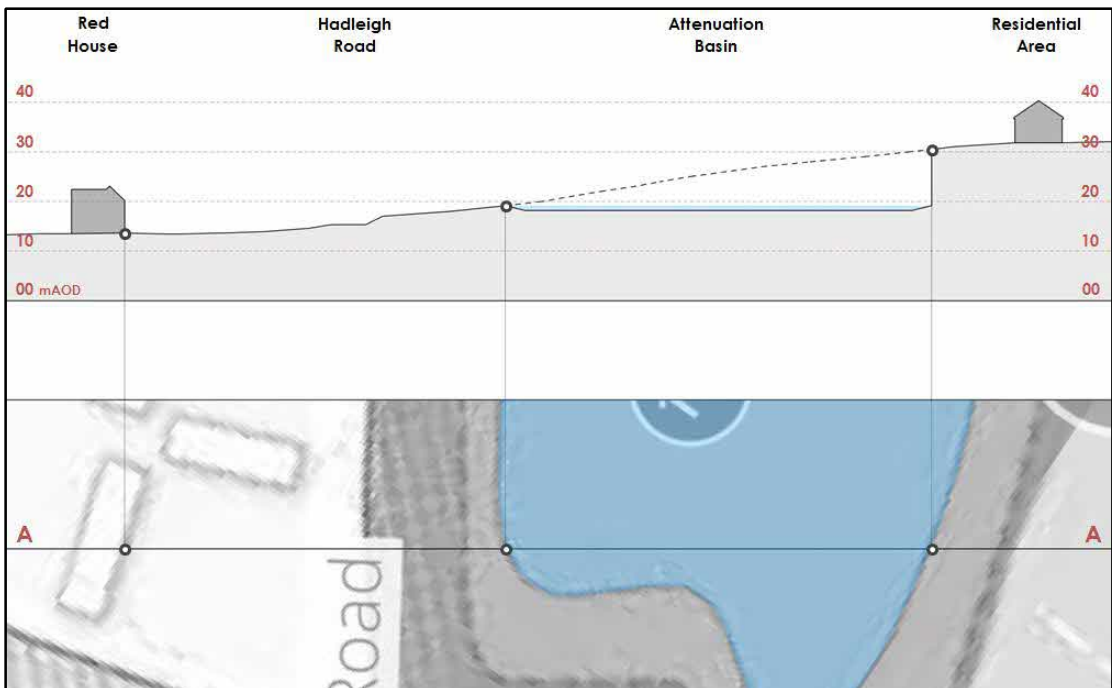


Fig .67 Requirement for alteration of natural landscape (Roger Balmer Design)

The section drawing was prepared in accordance with the existing topography and on the basis of the siting and extent of the residential areas and attenuation basins as shown on the indicative layout for 'Wolsey Grange 2'. The following assumptions were made: that the proposal is for 600 dwellings; that there would be a requirement for 25,000-30,000 cubic metres of storage; that the attenuation basins would cover an area of 25,000 square metres and each would have a minimum depth of 1.0m; and that the two-storey house types are as under construction at 'Wolsey Grange 1'. If a standard 1:4 gradient is applied to the banks of the basin then there would be a need for substantial grading works to the surrounding land which would result in the basin requiring a much greater area than is shown on the indicative layout.

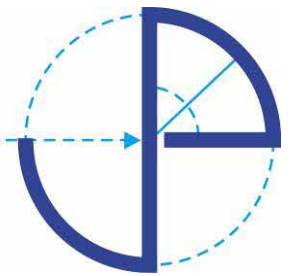
- 9.06 The site specific policy for the proposed land allocation states that any development should comply with ‘the relevant policies set out in the Joint Local Plan’, yet there is apparent conflict between this policy (LA013) and the policies for landscape (LP18) and the historic environment (LP20) in the ‘Preferred Options’ consultation document (July 2019).
- 9.07 The Council’s evidence base should inform the site selection process, yet the proposed land allocation does not adhere to the Council’s own ‘Landscape Guidance’ (2015), the ‘Suffolk Landscape Character Assessment’ (2011), and the recent sensitivity assessment for the ‘Landscape Fringes of Ipswich’ (2018). In addition, the ‘Heritage and Settlement Sensitivity Assessment’ did not consider the proposed land allocation.
- 9.08 The ‘Sustainability Appraisal’ (2019) concluded that the proposed land allocation would cause ‘no harm to the significance of a heritage asset or that mitigation of any potential harm was possible’. The appraisal stated that the site specific policy would address all potential negative effects relating to the historic environment, yet the Council’s own advisor considers that ‘no amount of mitigation planting will address the fundamental change to the rural character of the valley landscape which forms the setting and context to Red House’.
- 9.09 The principal reason for the refusal of permission in 1987 and for the dismissal of the subsequent appeal in 1988 is as relevant today as it was thirty years ago, with the added consideration that Chantry Park has since been entered on the register of parks and gardens. It is therefore of considerable concern that neither the decision of the Council nor that of the Appeal Inspector appear to have been considered in the site selection process.
- 9.10 The Appeal Inspector was of the opinion that ‘the setting of the listed buildings at Red House Farm would be seriously harmed’ and that the development would result in ‘the loss of the large and prominent tract of open countryside of considerable landscape quality which contributes significantly to the attractive appearance of the urban fringe on this important approach to Ipswich’. He concluded that ‘the development, however sympathetically designed, would result in irreparable harm to those characteristics on which I place a very high value, and the benefits associated with the proposed development would not compensate for its adverse effects’.
- 9.11 The valley landscape of the ‘land to the north of the A1071’ may be distinguished from the plateau ‘to the south of the A1071’ and, as a result, from the recent decision to grant permission for ‘Wolsey Grange 1’.

10.0 AVOIDANCE OF HARM TO SIGNIFICANCE

- 10.01 Proposed land allocations should be consistent with achieving sustainable development (including the conservation of the historic environment) and should be justified in terms of any impacts on heritage assets. If there is any conflict between a proposal and the conservation of a heritage asset, consideration should be afforded to whether alternative options could deliver benefits in a more sustainable and appropriate way.

Changes which would harm the heritage values of a significant place should be unacceptable unless the changes are (i) demonstrably necessary to meet an overriding public policy objective or need; (ii) there is no reasonably practicable alternative means of doing so without harm; (iii) that harm has been reduced to the minimum consistent with achieving the objective; and (iv) it has been demonstrated that the predicted public benefit decisively outweighs the harm to the values of the place ('Conservation Principles, Policies and Guidance for the sustainable management of the Historic Environment'; Historic England, 2008).

- 10.02 The proposed land allocation would result in harm to the significance of the identified designated heritage assets at Red House Farm (HIA1) and Chantry Park (HIA2). The Red House Farm comprises a pair of listed buildings (the former farmhouse and its barn), whilst Chantry Park is both a registered park and garden and a conservation area. Great weight should be given to the conservation of a designated heritage asset when considering the impact of a proposal on its significance. In the context of the 1988 appeal decision, which concluded that the benefits of delivering 1,600 houses did not outweigh the identified harm, the Council should amend the proposed land allocation to restrict residential development to the area of plateau that abuts the London Road and should consider alternative sites in order to deliver the proposed quantum of housing.



25 September 2019
IE19/046/REVB/HP

David & Annette Brennand
Red House,
Sproughton,
Suffolk

David and Annette,

A REVIEW OF THE CATCHMENT HYDROLOGY AND OTHER DRAINAGE RELATED MATTERS WITH RESPECT TO THE PROPOSED DEVELOPMENT ON LAND WEST OF CHANTRY PARK

It is our understanding that a national housebuilder is looking to put forward 'the land west of Chantry Park' and south of 'Red House' as part of the latest 'Call for Sites'; with a view to developing it for a combination of housing and associated community facilities. While no detailed plans are available, we have been provided with a vision document entitled "Wolsey Grange 2" dated November 2017.

The purpose of this assessment is to review the hydraulic context of the land with a view to assessing the potential impact of the proposed development on the catchment and its surrounding environs.

LOCATION

Chantry Vale lies due west of Ipswich and comprises a significant proportion of the contributing catchment area within the River Gipping's lower reaches. The client's property "Red House" lies centrally within the Vale.

LOCAL HYDROLOGY & HYDRO-GEOLOGY

The Vale comprises two main catchments, to the south and west, each drained by a central watercourse which merge to form a single channel immediately upstream of Red House before being culverted under the property and emerging on the northern side. This channel eventually discharges into the River Gipping approximately 300m downstream, see extract from aerial mapping overleaf.

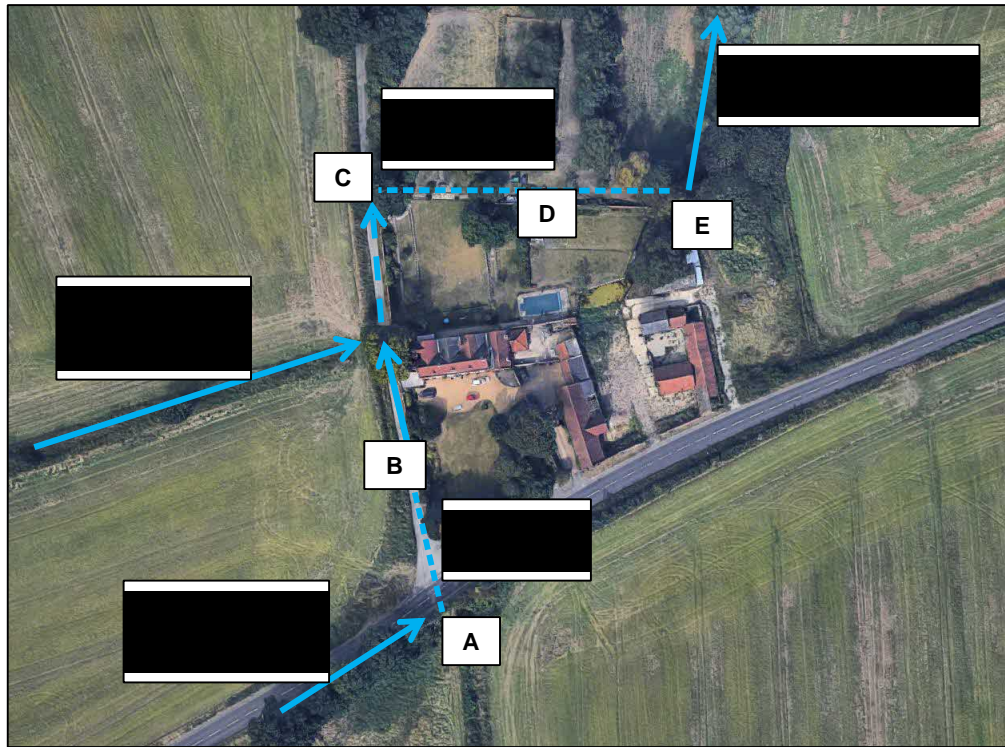


Figure 1 - Indicative Layout of Drainage Network Adjacent Red House

The Vale is underlain by variable geology; superficial deposits of Diamicton (Lowestoft Formation) line the watercourse while sporadic pockets of Sand (Red Crag) lie higher up the valley. The bedrock geology comprises Sand (Red Crag) in the upper reaches, Clay, Silt & Sand (Thames Group & Thanet Formation) in the middle reaches and Chalk (Newhaven) at lower elevations.

LOCAL FLOOD RISK CONSIDERATIONS

The lower lying northern end of the Vale lies in Fluvial Flood Zones 2 & 3 where the River Gipping overtops during times of high intensity rainfall or storms of prolonged duration. As the Chantry Vale catchment comprises a large percentage of the contributing area to the Gipping at this point, any changes to the local hydrology have the potential to cause a significant adverse impact on the extent of the flood zones downstream.

Surface water (pluvial) flooding has also been identified as a significant source of flood risk within the Vale. The EA's flood mapping indicates floodwaters may reach a depth of up to 900mm in places and have a flow rate in excess of 0.25 m/s adjacent to Red House. Notable areas at risk are those immediately upstream of the two culverted sections, the waterbody to the rear of Red House and the highways adjacent Red House. As Red House lies at the confluence of the two land drains it is particularly vulnerable to exceedance flows.

CULVERT(S)

The land drain from the southern catchment is culverted beneath the highway 'Hadleigh Road' for approximately 30m between points A & B shown in Figure 1 on the previous page. The watercourse re-emerges above ground for approximately 45m prior to its confluence with the western land drain.

The combined flows then enter a culvert, which passes through the rear garden of Red House. The Red House culvert is marked by an access chamber within the western verge of Church Lane [C] immediately adjacent Red House and a second access chamber midway along the culvert [D]. The culvert emerges approximately 90m downstream into a surface water feature on the north-eastern boundary of the property [E].

A combined topographical and CCTV drainage survey was undertaken in June 2019. The scope of this investigation included the adjacent ditches/watercourses/culverts and onsite drainage. A copy of this is enclosed. The survey reveals that points D and E were readily accessible and the access chambers were clear enough to identify cover and invert levels. All points upstream of D, A, B & C were recorded as being flooded and therefore not able to be surveyed. This flooding suggests the presence of a blockage between points C and D, preventing water from travelling through the culvert. We understand from anecdotal evidence that parts of this culvert have been repaired in the past, following previous incidents of flooding.

CONSTRAINTS TO FUTURE DEVELOPMENT WITHIN THE VALE

Overall Changes to the Hydrology

Flooding is a constant source of concern and threat to many properties along the Gipping Valley, including Red House, a protected, listed building located in the very centre of the proposed development. Large scale alterations to the valley will cause significant changes to the movement of surface water throughout the landscape.

The valley currently benefits from several natural existing land drains/small watercourses that channel surface water runoff towards the River Gipping. Overland flows currently make their way to these watercourses from many different parts of the valley with multiple points of discharge at very low rates. Restricting these discharges to a few much larger points of discharge, for example following attenuation, has the potential to increase the risk of scour/erosion within the watercourse(s) as in many areas they are steep and narrow.

The inclusion of new areas of impermeable surfacing (roof areas, hardstanding, roadways and footways) will increase the rate at which water sheds from the surface, inhibiting the natural potential off rainfall to infiltrate into the topsoil. Planning policy requires developers to mitigate this by intercepting and retaining the first 5mm of rainfall. Given the cohesive nature of the underlying geological deposits locally, this may prove very difficult to achieve.

Storage Requirements for the Wolsey Grange 2 Development

Industry best practise and SuDS guidance requires developers to mitigate the impact of their development. Following the development of a site surface water runoff should be reduced to mimic the greenfield scenario both in terms of volume and discharge rate. Preliminary calculations suggest that this would require in the order of 25,000 to 30,000 cubic meters of storage. This estimation is based on 600 proposed dwellings as indicated by the "Wolsey Grange 2 - Vision Document". It should be noted that the "Scoping Opinion Application" documentation indicated that the site would potentially be suitable for up to 800 dwellings, while the "Draft Joint Local Plan" has earmarked the site for approximately 1100 dwellings.

Any increase in the housing density/number of dwellings proposed would result in an increase in the required storage volume. While the permeability of the underlying geology may reduce this storage volume, other factors such as an allowance for climate change and urban creep will only increase this further.

On reasonably flat sites this storage can be provided fairly easily and can add wider ecological benefits however in this case, the sides of the valley are steep in places and above ground storage of surface water will require significant quantities of cut and fill to create the required contours/storage areas. The risk of storing large water quantities in this way, as shown within the developer's 'design rationale' section has the potential to significantly increase the risk of "flooding from artificial sources" to properties downstream.

Culvert(s)

Most of the surface water runoff originating within the Vale currently passes through the Red House culvert. The CCTV survey has identified that the existing infrastructure is in a relatively poor condition due to its age and may not be capable, of supporting existing flows or much less increases in the future. While there may be multiple causes of this, the principal culprit is likely to be tree root incursion/damage from the large conifer tree located adjacent point C.

The culvert is recorded to be 300mm diameter from points A to E, increasing to 500mm diameter downstream of the waterbody, this diameter is only marginally reduced by loss of cross-sectional

area due to silt deposition. This is recorded to vary from a 5% loss to 10% loss. Unfortunately, no such cross-sectional analysis was possible upstream of C, as the culvert was not in a condition which permitted it to be surveyed ie. pipes obscured by high water levels.

Unless runoff from the proposed development is restricted to greenfield rates or better, low frequency rainfall events/intense storms are likely to result in surcharging. The anticipated effects of climate change on rainfall will only exacerbate this risk.

Other Constraints to Development

BGS mapping indicates that the geology varies significantly within the valley. Extensive investigation and infiltration testing will be required to fully establish the infiltration potential of the underlying geology and ensure that any future drainage strategy reflects this. The variability of the geology and sloping topography of the Vale are likely to result in a complex drainage solution and lower housing density.

A discharge agreement will need to be agreed with Lead Local Flood Authority (LLFA), Environment Agency (EA) and/or neighbouring landowners which could become problematic and/or costly.

It will need to be demonstrated that no flooding will occur to neighbouring land after the proposed changes to the landscape. Detailed hydraulic modelling will be required to adequately assess the impact of the increased discharge on the watercourse. This must also take into account the possible effect of impounded water. Flood flow exceedance paths will need to be modelled and plotted for various probability events.

SUMMARY

Overall, we consider it likely that any large-scale development of the valley will cause a detrimental impact on the natural movement of surface water, the watercourses which convey runoff through the valley and the level of flood risk to properties downstream. It is our considered opinion that there are significant risks associated with such an extensive development in this location should be resolved in detail before the land is earmarked for development.

Yours faithfully

A large black rectangular redaction box covering the signature area.

H Purkis BSc (Hons) GradCIWEM - Senior Environmental Engineer
On behalf of JPC Environmental Services (a division of J P Chick & Partners Limited)