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Jean Chambers
Principal Planner (Development Management)
Farham Borough Council
Civic Offices
Civic Way
Fareham
PO16 7AZ

Dear Ms Chambers,

Land at Newgate Lane (North), Fareham: Landscape and visual matters

I am writing in respect of the above site and in response to the recent consultation comments on landscape and visual matters.

Having reviewed the comments from the urban design officer on the scheme, I note that their conclusions suggest that the proposed development will have an 'unacceptable negative impact upon the integrity of the existing open, predominantly rural agricultural character'.

However, having reviewed the points raised, we feel that the overall conclusion on the degree of impact has been overemphasised, and does not give sufficient regard to the content and judgements which are set out in the detailed LVIA, submitted with the application.

A brief rebuttal of the key points is set out below, this being based on the content and findings of the submitted LVIA. Matters for clarification include:

i. Initially, the officer describes the baseline, acknowledging the physical components of the site, but without acknowledgement of the surrounding context – a context which has a strong influence on the local landscape character. This includes the physical and visual containment that is created by the existing settlement edge (as characterised by built form of existing residential areas, some commercial units and built form at HMS Collingwood).

ii. Whilst there is mention of 'Newgate Lane East', there is no reference to the character and influence of this route as a major piece of highway infrastructure that has recently been constructed and cuts across this part of the landscape, further degrading the landscape and any rural character it may have previously had. Furthermore, there is no reference to the emerging baseline of other residential proposals coming forward in the area which will fundamentally alter the local landscape context. By considering the appropriate baseline, as described in the submitted LVIA, appropriate judgements can be made regarding the degree of change and predicted impact. In the context of the settlement/urban fringe, any impact will be far more limited.

iii. The officer has made reference to the published character assessment for the Borough. This is an appropriate document to refer to in respect of the analysis of the baseline situation for the site and its context. As such, the submitted LVIA similarly references the relevant parts of the published character study. However, it is important to note that the

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submitted LVIA also undertakes a more detailed and up to date analysis of landscape character in respect of the site and its immediate context. This approach consequently acknowledges the much changed baseline to that which is set out by the 2017 study.

iv. The officer makes reference to the findings of the 2017 character assessment, noting the sensitivity to change as 'moderate to high'. As noted above, judgements on landscape sensitivity need to be moderated in the context of the altered and emerging baseline, based on a more up to date analysis. Such an approach has been adopted by the submitted LVIA, which concludes that the landscape sensitivity of the local landscape character is 'low to medium'.

iv. The officer also references the generally 'open' landscape and perceived difficulties of siting development without it being highly visible. This statement does not give proper context to the reference, whereby a more open landscape is present to the south (and south of the B3334) and also in the wider gap to Stubbington. The context of the site is far more of an enclosed or semi-enclosed landscape, being contained as it is by the existing (and emerging) settlement edge to the east, north and north-west and by tree and woodland cover to the west. The officer's reference to eroding the physical and visual gap between settlements is not given in context, as the gap between the site and Stubbington will not be reduced.

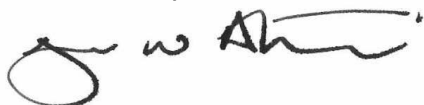
v. Concern in respect of the officer's conclusion should also be raised in relation to the interpretation of landscape and visual effects. It is long established that these are separate matters, however the officer refers to the LCA being 'moderate to high sensitivity to change' (i.e. pertaining to landscape effects), but goes on to note that this 'depends on the viewer (car or pedestrian)' (pertaining to visual receptors and visual effects). There is a need to challenge and clarify the process of professional judgement before the conclusions drawn on acceptability of the proposed development can be relied upon.

vi. Overall, it is considered that the more detailed analysis set out in the submitted LVIA addresses many of the issues raised, giving clear analysis and justification for the professional judgements therein. Consequently, the conclusion of the submitted LVIA are considered to be robust and, notwithstanding that the impacts on the site itself are typical of many greenfield developments, the impacts on the local landscape character will be limited and the proposed development is considered to be acceptable in landscape and visual terms.

There is always an inherent difficulty in describing and condensing complex issues in a short consultation response, but there remains a need to properly judge such issues against the submitted LVIA in order to establish a justification for the conclusion and that the overall of landscape and visual effects would be acceptable in this case.

Please feel free to contact me if you would like to discuss any of the above in more detail.

Yours faithfully,



James W. Atkin
DIRECTOR