



## Appeal Decision

Inquiry Held on 11-14 December 2018

Site visit made on 14 December 2018

**by Christina Downes BSc DipTP MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 22 January 2019**

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**Appeal Ref: APP/A1720/W/18/3200409**

**Land west of Old Street, Stubbington, Hampshire**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by Bargate Homes against the decision of Fareham Borough Council.
  - The application Ref P/17/1451/OA, dated 1 December 2017, was refused by notice dated 23 March 2018.
  - The development proposed is the construction of up to 160 residential dwellings, access from Old Street, landscaping, open space and associated works.
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### Decision

1. For the reasons given below, the appeal is dismissed.

### Procedural Issues

2. The application was submitted in outline with all matters save for access reserved for consideration at a later stage. It was accompanied by an illustrative masterplan and I have taken this into account insofar as it demonstrates how the site could be developed if the maximum number of dwellings were to be built. There is no evidence to support justification for any lower number and, in such circumstances, it is reasonable to assume that if planning permission were to be granted the maximum number could be built.
3. Before the Council made its decision, the number of dwellings was reduced to up to 150. This was to take account of Great Crabthorn, which is a 17<sup>th</sup> century Grade II listed building. Its original setting would have included the surrounding rural landscape although this has now been compromised by modern development on the eastern side of Old Street. Nevertheless, the open fields to the west, including the northern part of the appeal site, make a contribution in terms of setting. The aforementioned revision would allow this area to be kept free of built development. The setting of Great Crabthorn would thus be preserved.
4. The inquiry was closed on 14 December 2018. However, I allowed further time to complete the Planning Obligation by Unilateral Undertaking (UU), following its discussion at the inquiry. The Deed includes covenants that provide for open space, an ecological buffer, affordable housing, a travel plan, primary education and highways works, including improvements to encourage sustainable travel modes. These provisions were discussed at the inquiry and I

am satisfied that together with a planning condition on sustainable drainage, the covenants in the UU would be capable of addressing reasons for refusal c)–h) and j)–m).

5. The UU also includes mitigation in respect of the impact on the Solent and Southampton Water Special Protection Area, Ramsar site and Site of Special Scientific Interest. There is no dispute that if I were minded to allow the appeal I would need to re-consult with Natural England and undertake an Appropriate Assessment under the Habitats Regulations. The proposal includes a number of mitigation measures, including an ecological buffer on the western side of the site and cat protective fencing. However the *People over Wind* judgement<sup>1</sup> makes clear that the Appropriate Assessment must precede a consideration of the effectiveness of these measures in terms of protecting habitat integrity. The process cannot be pre-judged and so reason for refusal i) remains outstanding.
6. Reason for refusal b) relates to design. Following discussions during the course of the inquiry the Council is satisfied that this objection could be addressed through the use of planning conditions and I agree with that judgement.
7. Bearing all of the above points in mind, the main issues on which this appeal turns concern the effect on the Meon Valley landscape, whether there would be harm to a valued landscape and the effect on the strategic gap. Before considering these matters I address the planning policy context.

## Reasons

### ***Planning policy and approach to decision making***

8. The relevant parts of the development plan comprise the *Local Plan Part 1: Fareham Borough Core Strategy* (LPP1) (2011) and the *Local Plan Part 2: Development Sites and Policies* (LPP2) (2015). The appeal site is outside the settlement boundary of Stubbington and within the strategic gap. It lies within the countryside for planning policy purposes. Policy CS14 in LPP1 and policy DSP6 in LPP2 apply strict controls to new development in such areas. There is no dispute that the appeal proposal would conflict with these policies. Policy CS22 concerns development in strategic gaps and the parties do not agree whether it would be offended.
9. The Council is unable to demonstrate a five year supply of deliverable housing sites. This is on the basis of a requirement taken from Office for National Statistics (ONS) housing projections on account of the requirement in the adopted development plan being out-of-date. The best case on the Council's assessment is a supply of some 3.8 years, which is derived from the 2016 ONS projections. The Appellant considers the situation is considerably worse at around 2.5 years on the basis of the 2014 ONS projections<sup>2</sup>. Whichever is correct the shortfall is substantial and this is agreed by both main parties.
10. In view of the deficit the Council's housing supply policies are out-of-date. This is a material consideration of some importance when considering the weight to be given to the location of the appeal site outside of the settlement boundary and within the strategic gap. However, that does not mean that the protection

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<sup>1</sup> Court of Justice of the European Union *People over Wind, Peter Sweetman v Coillte Teoranta* C-323/17.

<sup>2</sup> Both positions are based on an assessment at 31 March 2018.

of landscape character and the separation of settlements is a matter to be set aside. The National Planning Policy Framework (the Framework) recognises the intrinsic character and beauty of the countryside and seeks the protection and enhancement of valued landscapes. Whilst strategic gaps are not specifically referred to, it endorses the creation of high quality places, which would include respecting the pattern and spatial separation of settlements.

11. Policy DSP40 in LPP2 is specifically designed to address the situation where there is a five-year housing supply shortfall as is the case here. It allows housing to come forward outside of settlements and within strategic gaps, subject to a number of provisions. It seems to me that this policy seeks to complement the aforementioned policies in situations where some development in the countryside is inevitable in order to satisfy an up-to-date assessment of housing need. It assists the decision maker in determining the weight to be attributed to the conflict with restrictive policies such as CS14, CS22 and DSP6 and provides a mechanism for the controlled release of land through a plan-led approach. Policy DSP40 is in accordance with Framework policy and reflects that the LPP2 post-dates the publication of the Framework in 2012. Conflict with it would be a matter of the greatest weight.
12. There is no dispute that the only criterion in policy DSP40 that the proposal may offend relates to the effect on the landscape and strategic gap. If it does not conflict with the provisions of this policy, it seems reasonable to conclude that the proposal would be in accordance with the development plan as a whole.
13. Paragraph 11 of the Framework establishes the presumption in favour of sustainable development by applying a "tilted balance" to cases where housing supply policies are out-of-date. However, the presumption does not apply if the proposal conflicts with protective policies and this includes where development requires Appropriate Assessment. At the present time paragraph 177 makes clear that this is regardless of whether or not the assessment results in a favourable outcome. The benefits and harms will therefore be weighed against each other in this case and the "tilted balance" is not engaged.

### ***The effect on the Meon Valley landscape***

14. The appeal site comprises some 10.5 hectares of land on the western side of Old Street, which is bordered by a screen of hedges and trees. It is divided into two parcels separated by a hedged track known as Marsh Lane. The northern field is used for the grazing of horses. The southern field is overgrown with rank vegetation, although the evidence indicates that it has been cultivated in the past. The southern boundary runs along a dry valley that cuts into the site. Houses in Knights Bank Road occupy the southern slope of this small valley and the boundary is relatively open at this point. Immediately to the west is the Titchfield Haven National Nature Reserve (NNR), which occupies the flat valley floor of the River Meon close to its confluence with the Solent. This provides feeding grounds and overwintering habitat for internationally protected waders and waterfowl and is within the Solent and Southampton Water Ramsar Site and Special Protection Area.
15. The Meon Valley is a major landscape feature that runs through the Borough and slices through the coastal plain. The *Hampshire Integrated Character Assessment 2012* is a county-wide study that recognises the Meon Valley landscape character area as a major river valley with the two main landscape

types being the flat valley floor and the coastal plain. It identifies a strong sense of seclusion and an intimate rural landscape character. At the local level, the 1996 *Fareham Borough Landscape Assessment* (the 1996 LCA) was adopted as supplementary guidance and provided the evidence base for the now superseded Fareham Local Plan Review (2000). This was updated and expanded in the 2017 *Fareham Landscape Assessment* (the 2017 LCA), which forms part of the evidence base for Fareham's emerging Local Plan. It is appreciated that this is as yet only at the very early stages and has not been subject to scrutiny through the examination process. However, from my reading the basic analysis in the 2017 LCA is very similar to its predecessor.

16. In all three assessments the Meon Valley landscape character area has similar boundaries but it seems to me that the two Borough assessments provide a finer grain analysis. In the 2017 assessment the Meon Valley is divided into two local landscape character areas. The appeal site is within the Lower Meon Valley, which includes the section south of Titchfield. Whilst such division did not occur in the 1996 LCA it did identify clear differences between parts of the valley. The Appellant complains that the 2017 assessment does not identify existing detractors to landscape character such as the intrusion of urban development and fringe farmland. However, the 1996 assessment regards the smaller enclosed pastures bordering the valley south of Titchfield as functioning to buffer such intrusion and this is a point picked up in the later work. In the 1996 assessment the reference to detractors in the central section of the Meon Valley seems to me to refer to the part further to the north.
17. The Lower Meon Valley is characterised by its distinctive valley floor with open floodplain pasture and wetland communities at Titchfield Haven. Here the natural qualities of the valley and the sense of tranquillity and remoteness are most strongly evident. The valley sides are relatively shallow and it is clear from the topographical map and on the ground that they have a distinctive concave profile. The steeper well vegetated slopes at the bottom become gentler further up the valley sides. This means that the valley floor is not always visible from the upper slopes but there are clear views from one side to the other providing a strong sense of cohesiveness to the landscape unit.
18. The eastern valley sides include a mosaic of small-scale pasture land bounded by strong field hedges and tree lines. The 2017 LCA subdivides the local landscape character area into three sections comprising the flat valley floor and the landscape either side. These form a gentle transition from valley side into the landscape of the wider coastal plain, although from observation this is more evident in some places than in others.
19. The appeal site seems to me to include many of the characteristics of the valley side landscape type described above. There are two well-contained fields with relatively strong hedge and tree boundaries along Marsh Lane, Old Street and parts of the northern, western and southern boundaries. In visual terms the flat valley floor can be viewed from many parts of the site, including from within the areas proposed for development. The opposite valley sides are also clearly seen from most places. These features provide a perception that the site is part of the valley landscape compartment. Whilst the slope is gentle in the eastern part of the site it continues to rise beyond the Old Street boundary and reflects the concave profile that is typical of the valley side in this part of the valley.

20. It is acknowledged that the site suffers from some detracting influences. The proximity of residential development along Old Street and Knights Bank Road inevitably has a negative effect, although this is ameliorated to a considerable degree along Old Street by virtue of the hedge line and trees. The most exposed part of the site is in the south where the houses built on the southern slopes of the dry valley are quite prominent. There is also a background hum of traffic noise close to the eastern boundary. However, from my site observations these detractors are localised and do not extend across much of the proposed development area. The sense of tranquillity and remoteness so typical of the lower parts of the valley is not particularly evident. However, I observed a strong sense of being in the countryside in general and the valley in particular from most parts of the site.
21. I acknowledge that the boundaries between one landscape type and another are often indistinctive, especially at the edges. However, in this case for all of the reasons given above I did not detect visual or topographical differences that would signal a change from valley side to coastal plain landscape type across the appeal site. In my judgement it is all reflective of the valley side landscape type and forms an integral part of the Lower Meon Valley landscape.
22. Generally development does not extend down the sides of the Lower Meon Valley but the threat of such urban expansion is mentioned in both the *Hampshire Integrated Character Assessment* and the 2017 LCA. The settlement of Stubbington itself is mainly situated above the 10 metre AOD contour. The main exception to this prevailing development pattern is the residential area of Hill Head immediately to the south of the appeal site, which includes the housing along Knights Bank Road. Here dwellings extend down the slope to the valley floor. There is tree screening along the residential boundaries but nevertheless the effect of this incursion is not a positive one in landscape terms.
23. In order to assess the effect of the proposed development, the Appellant has submitted a Landscape and Visual Assessment (LVA). Both landscape experts agreed that the sensitivity of the Lower Meon Valley landscape receptor is moderate-high. The magnitude of change from development in the short term was agreed to be medium. On completion the effect would be moderate adverse on the evidence of the Appellant and moderate-major adverse on that of the Council. I am more inclined towards the Council's judgement in this respect but whichever is preferred it seems to me that the overall effect would be significant and harmful.
24. There was also no agreement about the longer term effect on the landscape and whether the proposed mitigation would result in a reduction in effect to minor adverse as contended by the Appellant. Changes would mainly result from additional tree planting around the western edge of the proposed housing area, which is intended to reach a height of 15-20 metres. This would eventually soften the effect of development in visual terms. However, it would remain the case that there would be a permanent change to a substantial part of the site from valley side to a housing estate. Not only would the open fields be lost to built development but also there would be the noise, activity and lighting that such uses would entail. In the circumstances of this case I would agree with the Council that there is unlikely to be much diminution in landscape effect as a result of mitigation.

25. As views into the valley from outside of it are relatively limited the visual effects of the proposed changes to the landscape would be experienced mainly from viewpoints on the opposite side of the valley, although overall there would be the benefit of considerable distance. From these places the existing properties along Old Street and Knights Bank Road can be clearly seen on the skyline. Even though they stand within a treed setting there is particular prominence in places due to the presence of light coloured facing materials.
26. Existing trees and vegetation, especially on the lower valley sides, means that from many public viewpoints only partial views of the appeal site are evident. Parts of public Footpath No 51 is bordered by an unmanaged hedge along its eastern side, which restricts relevant views from many points. Most of those who use this route are likely to value the sense of remoteness and thus to have a high sensitivity to change. However, the magnitude of change would be relatively small in most views as the new housing would be seen within the context of a wide panorama. The proposed planting would further reduce the adverse effect once established. Some observers would be more sensitive to change than others but overall I consider that the effect would be of minor significance, especially in the longer term.
27. Entry to the NNR is not free so views are not strictly speaking publicly available. On the other hand the entry fee is relatively modest and from what I heard at the inquiry the facility attracts a considerable number of visitors who enjoy use of the bird hides and the pathways. I consider that these people are likely to have a heightened appreciation of the natural environment and a greater awareness of changes to their surroundings. Furthermore, many will observe wildlife through binoculars thus bringing more distant views into sharper focus.
28. From various points in the NNR, including the Spurgin and Pumfrett hides, which I visited, the eastern valley sides are clearly evident above the band of trees and vegetation on the lower slopes. I noted that at the southern end the residential area of Hill Head, which extends close to the valley floor, is particularly apparent. However, walking north the surroundings become more rural, existing development is less obvious and by the time I reached the Spurgin Hide much of the appeal site had come into view. The viewing window of the hide faces in an easterly direction and the proposed development would be evident on the gently sloping valley side and at depth. Notwithstanding the existing housing on the skyline, I consider that it would be viewed as an unwelcome intrusion in the rural landscape to these highly sensitive viewers. Whilst I appreciate that the mitigation planting would eventually reduce the impact, the upper parts of the new buildings would still be clearly apparent. I therefore consider that the visual effect has been underestimated in the LVA. In my judgement there would be a moderate adverse effect that would reduce to a moderate-minor adverse effect once mitigation planting had matured in around 15 years.
29. For all of the above reasons I conclude that there would be unacceptable harm to the attractive landscape of the Lower Meon Valley. Overall this would be a long term, permanent and adverse change in terms of the resource itself. For many of those who use and enjoy the landscape the effects would be relatively small, especially in the longer term. Nevertheless highly sensitive viewers in the NNR would experience a greater degree of detriment and this adds to the harm that would arise from the proposed development.

***Whether the proposal would harm a valued landscape***

30. Paragraph 170 of the Framework indicates that valued landscapes should be protected and enhanced in a manner commensurate with their statutory status or identified quality in the development plan. Parts of the Lower Meon Valley are protected for their ecological importance but the landscape is not specifically recognised for its quality in the current development plan. This is because local landscape designations fell from favour in national planning policy. Previously the Lower Meon Valley had been identified as an Area of Special Landscape Character in the now superseded *Fareham Borough Local Plan Review 2000* supported by the 1996 LCA.
31. In view of the policy in paragraph 170 the matter of landscape value will no doubt be considered through the emerging Local Plan process. That is the proper forum for any designation to be made. However, until that time it is difficult to understand why there would be a change in terms of intrinsic value. Case law and appeal decisions indicate that a valued landscape is more than ordinary countryside and should have physical attributes beyond popularity. Furthermore, that it is not necessarily the site itself that is important in that judgement but rather the wider landscape of which the site is an integral part. It was agreed that the criteria in the 1996 LCA that led to the identification of the Area of Special Landscape Character were similar to those in Box 5.1 of the Landscape Institute's *Guidelines for Landscape and Visual Impact Assessment* (2013). Both landscape experts used Box 5.1 in their evaluation.
32. Having considered all of the evidence and the assessments against the Box 5.1 criteria, I have no doubt that the Lower Meon Valley is a valued landscape. The Appellant's landscape expert judged it to have high value and did not seem to dispute that the western part of the appeal site is part of the valley side landscape type and could be considered as part of a valued landscape. The dispute related to the eastern part of the site on which the development is proposed to be built. For the reasons I have already given I do not agree that there is a distinction in terms of landscape type or character within the site. On the contrary I consider that the appeal site overall possesses sufficient physical attributes to be deemed as an integral part of the Lower Meon Valley and contributes to its valued landscape.

***The effect on the strategic gap***

33. The Meon Gap lies between Fareham/ Stubbington and the Western Wards/Whiteley. Policy CS22 requires the integrity of the gap to be maintained and the physical and visual separation of settlements to be respected. In terms of separation of settlements there is no dispute that there would be no diminution either in physical or visual terms if the development were to go ahead. The policy indicates that the gap boundaries will be reviewed to ensure that no more land than necessary is included in order to maintain gap function.
34. When considering the effect on integrity it is important to note that the policy does not embargo development altogether but rather requires that it should not cause significant harm. Protecting integrity will therefore be case specific. Harm to gaps arises from a diminution of spatial function and so it is difficult to understand how integrity could be significantly affected in the event that this is maintained. In this case it seems to me that the settlement pattern would be protected whether or not the proposed development went ahead.

35. It should be remembered that gap policy is a spatial tool. The Council referred to the role of the gap in maintaining the character or setting of Stubbington. This is considered in the 2017 LCA where the strategic gap designation is reviewed. However, the document makes clear that its purpose is to consider what role the landscape plays within the strategic gaps. It is not intended to examine the designation criteria or the broad areas identified. This is important to note because it is landscape rather than spatial considerations that are key to settlement character and setting. The character and setting of Stubbington is not pertinent to gap designation or function in policy CS22.
36. I appreciate that a review of gap boundaries was undertaken in 2012 and that no changes were recommended in relation to the land immediately adjacent to Stubbington. However, for the reasons I have given I do not consider that the proposed development of the appeal site would adversely affect the integrity of the Meon Gap. The proposal would thus accord with policy CS22 in LPP1.
37. A recent appeal decision related to development at Meon View Farm, which is to the north of the appeal site but in the same part of the Lower Meon Valley. In her decision the Inspector dismissed the appeal on the grounds of harm to the countryside and strategic gap. I do not know what evidence was before my colleague but her conclusion that the integrity of the gap would be undermined referred to the erosion of its function of physically and visually separating settlements. In the case of the present appeal the Council has agreed that such coalescence would not occur.

### **Overall Conclusions and Planning Balance**

38. The appeal site is an integral part of the Meon Valley landscape character area and in particular the lower section south of Titchfield. This landscape is valued for its quality, even though there is no designation in the current development plan. The proposed development would be unacceptably harmful to the character of the Lower Meon Valley and would fail to protect this valued landscape. The proposal would therefore conflict with policies CS14 in LPP1 and policy DSP6 in LPP2 and be contrary to Framework policy relating to the countryside and landscape.
39. However, due to the housing land supply situation in Fareham Borough the conflict with those policies has reduced weight and policy DSP40 is engaged. In cases such as this development outside the urban area is permitted subject to five provisions, all of which must be met. For the reasons given above, the location of the site in the strategic gap would not be an impediment. However, the proposal would fail to minimise any adverse impact on the countryside. In the circumstances there would be conflict with this policy and the development plan as a whole.
40. The proposal would deliver up to 150 new dwellings in an accessible location that would be likely to be available for occupation within the next five years. It would therefore make an important contribution to addressing the Council's housing shortfall, which on any basis is substantial. Furthermore, 40% of the dwellings would be affordable housing with a tenure mix that would meet the Borough's housing needs. There is a very considerable affordable housing deficit and this is getting worse year on year. 5% of the dwellings would also be self and custom build, which is encouraged as a source of supply by the Government and for which there is an unmet demand in the Borough.



41. The proposal would have a range of economic benefits. It would, for example, provide new jobs during the construction period and thereafter. There would be a contribution to economic growth and the generation of household expenditure would help support the local economy and provide local jobs.
42. The proposal would deliver additional green space in the Stubbington ward where there is a deficit. The buffer zone between the housing area and the NNR would be managed to enhance its ecological value and therefore there would be a net gain to biodiversity in accordance with the provisions of the Framework. These social, economic and environmental benefits of the scheme can be afforded substantial weight in the planning balance.
43. There was a great deal of concern from local people about the effect of the development on the NNR. I have taken account of the visual implications in my conclusions on landscape. However, subject to the various safeguards proposed through planning conditions and the UU I consider that the proposed development could be designed so that significant harm would not be caused to this ecological resource. It is not therefore a matter that counts against the scheme. In this case it is unnecessary for me to undertake an Appropriate Assessment. However, if I had done so and a positive outcome had ensued it would not have affected the planning balance or my conclusions on this appeal.
44. Notwithstanding the substantial benefits that would flow from the proposed development there would also be very substantial harms. In this case the conflict with the development plan and the environmental harm that would ensue to the countryside within the valued landscape of the Lower Meon Valley is of compelling importance and outweighs the many advantages of the scheme. I have considered all other matters raised but have found nothing to change my conclusion that this would not be a sustainable form of development and that the appeal should not succeed.

*Christina Downes*

INSPECTOR

## APPEARANCES

### FOR THE LOCAL PLANNING AUTHORITY:

Mr Paul Stinchcombe	Of Queen's Counsel, instructed by the Senior Solicitor at Southampton and Fareham Legal Services Partnership
<i>He called:</i>	
Mr P Brashaw BSc(Hons) BLD CMLI	Associate at LDA Design
Mr A Blaxland BA(Hons) DipTP DipMgt MRTPI	Director of Adams Hendry Consulting Ltd
*Mr R Wright BSc MSc MRTPI	Fareham Borough Council
*Ms H Hudson	Solicitor at Fareham Borough Council
*Ms R Lyons BA(Hons) MSc MRTPI	Affordable Housing Strategic Lead, Fareham Borough Council

### FOR THE APPELLANT:

Mr Christopher Boyle	Of Queen's Counsel, instructed by
<i>He called:</i>	
Mr L Morris BSc(Hons) PGDipLA MA PIEMA CMLI	Director of WYG
Mr M Hawthorne BSc(Hons) MRTPI	Director of WYG
Mr D West MenvSci(Hons) CEnv MCIEEM	Associate at WYG
Mr S Brown BSc(Hons) DipTP MRTPI	Principal at Woolf Bond Planning
*Mr T Alder LLB	Solicitor at Bargate Homes
*Mr T Moody BA(Hons) MRTPI	Associate Planner with WYG

### INTERESTED PERSONS:

Commander A Norris RN	Local resident
Mr M Jackson	Local resident
Mr B Duffin	Past employee and current volunteer at the Titchfield Haven National Nature Reserve
Mr B Hutchison	Chair of the Hill Head Residents' Association
Ms P Charlwood	Local resident also representing 35 other local households
Mr J Moss	Local resident
Mr M Rose	Local resident
*Ms T Cuff BSc	Countryside Planning Officer at Hampshire County Council

\* Took part in the Planning Obligations/ Conditions sessions only

## **DOCUMENTS**

- 1 Statement delivered orally to the inquiry by Commander Norris
- 2 Statement delivered orally to the inquiry by Mr Jackson
- 3 Additional housing land supply position statement agreed by the Council and the Appellant
- 4 Further additional housing land supply position statement agreed by the Council and the Appellant
- 5 Statement delivered orally to the inquiry by Mr Hutchison
- 6 Press release regarding the emerging Local Plan and plans of developable and discounted housing sites, submitted by Mr Hutchinson
- 7 Statement delivered orally to the inquiry by Mr Duffin, including various attachments
- 8 Statement delivered orally to the inquiry by Ms Charlwood, including photographic attachments
- 9 Community Infrastructure Levy compliance schedule, submitted by Mr Stinchcombe
- 10 Note on the New Homes Bonus, submitted by Mr Boyle
- 11 Proposed conditions schedule submitted by the main parties
- 12 Appellant's written agreement to pre-commencement conditions, submitted by Mr Boyle
- 13 Copy of Technical Note 05 (also included as Core Document A2.4), setting out the proposed highway improvements, submitted by Mr Boyle
- 14 Illustration of a design for the proposed fence to deter cats
- 15 Addendum to the shadow Habitat Regulations Assessment in Appendix B to Mr West's proof of evidence. Submitted by Mr Boyle
- 16 Planning Obligation by Unilateral Undertaking dated 20 December 2018. Submitted following the close of the inquiry with the agreement of the Inspector

## **PLANS**

- A Application plans
- B Plans booklet
- C Plan including the proposed open spaces, buffer zones, vista and landscape screen
- D Map of the Stubbington area