

TOWN & COUNTRY PLANNING ACT 1990  
S78

APPEAL BY

**Persimmon Homes  
South Coast**

FOR:

DEVELOPMENT COMPRISING 206  
DWELLINGS

AT

LAND EAST OF CROFTON CEMETERY  
AND WEST OF PEAK LANE,  
STUBBINGTON, FAREHAM



LANDSCAPE STATEMENT OF CASE

LPA REF: P/20/0522/FP  
ACD REF: PERSC22805\_LSoC  
DATE: 13<sup>th</sup> May 2021

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## 1.0 INTRODUCTION

1.1 This Landscape Statement of Case (“LSoC”) has been prepared as an Appendix to the Statement of Case (“SoC”) on behalf of Persimmon Homes South Coast (“The Appellant”).

1.2 The LSoC supports a planning appeal pursuant to Section 78 of the Town and Country Planning Act (as amended), in respect of a decision made by the planning committee of the Local Planning Authority (“LPA”), Fareham Borough Council (“FBC”), on 17 February 2021 to refuse planning permission for residential development on land east of Crofton Cemetery and West of Peak Lane, Stubbington (“the Appeal Site”).

1.3 The description of development is as follows (“the Appeal Scheme”):

*‘Development comprising 206 dwellings, access road from Peak Lane maintaining link to Oakcroft Lane, stopping up of a section of Oakcroft Lane (from Old Peak Lane to Access Road), with car parking, landscaping, sub-station, public open space and associated works’.*

1.4 The application was recommended for approval by officers. However, Members of the Planning Committee chose to disregard the advice of their officers and refused the planning application for 10 reasons, which are as follows:

*‘The development would be contrary to Policies CS2, CS4, CS6, CS14, CS15, CS17, CS18, CS20, and CS21 of the Adopted Fareham Borough Core Strategy and Policies DSP1, DSP2, DSP3, DSP6, DSP13, DSP14, DSP15 and DSP40 of the Adopted Local Plan Part 2, and is unacceptable in that:*

*i) the provision of dwellings in this location would be contrary to adopted local plan policies which seek to prevent residential development in the countryside;*

*ii) the development of the site would result in an adverse visual effect on the immediate countryside setting around the site;*

*iii) the introduction of dwellings in this location would fail to respond positively to and be respectful of the key characteristics of the area, in this*

*countryside, edge of settlement location, providing limited green infrastructure and offering a lack of interconnected green/public spaces;*

*iv) the quantum of development proposed would result in a cramped layout and would not deliver a housing scheme of high quality which respects and responds positively to the key characteristics of the area. Some of the house types also fail to meet with the Nationally Described Space Standards;*

*v) had it not been for the overriding reasons for refusal the Council would have sought to secure the details of the SuDS strategy including the mechanisms for securing its long term maintenance;*

*vi) in the absence of a legal agreement to secure such, the development proposal would fail to secure a provision of affordable housing at a level in accordance with the requirements of the Local Plan;*

*vii) in the absence of a legal agreement to secure such, the proposal would fail to; a) provide satisfactory mitigation of the 'in combination' effects that the proposed increase in residential units on the site would cause through increased recreational disturbance on the Solent Coastal Special Protection Areas, and b) secure the creation of the ecological enhancement area and its long term management and maintenance to enhance the wider Solent Wader and Brent Goose network;*

*viii) in the absence of a legal agreement securing provision of the open space and facilities and their associated management and maintenance, the recreational needs of residents of the proposed development would not be met;*

*ix) in the absence of a legal agreement to secure the submission and implementation of a full Travel Plan, payment of the Travel Plan approval and monitoring fees and provision of a surety mechanism to ensure implementation of the Travel Plan, the proposed development would not make the necessary provision to ensure measures are in place to assist in reducing the dependency on the use of the private motorcar;*

*x) in the absence of a legal agreement to secure such, the proposal would fail to provide a financial contribution towards education provision’.*

- 1.5 Two of these reasons for refusal relate directly to landscape matters; ii) and iii). This LSoC sets out the Appellant’s case in relation to reasons for refusal ii) and iii) through the evolution of the scheme in response to and in conjunction with FBC Officers’ consultations, recommendations and with reference to FBC’s development plan, namely the Adopted Fareham Borough Core Strategy and the Adopted Local Plan Part 2, the National Planning Policy Framework (NPPF), and technical consultee responses.

## **2.0 APPEAL SITE AND CONTEXT**

- 2.1 The Appeal Site measures approximately 19.4ha and comprises mainly agricultural land, bisected by Oakcroft Lane. The site is located immediately north of the urban area of Stubbington and is separated into two distinct areas, land on the southern side of Oakcroft Lane and land to the north of Oakcroft Lane.
- 2.2 Land on the southern side of Oakcroft Lane is bounded by residential development to the east, with a line of protected trees forming an existing buffer between the Appeal Site and the existing residential development. The southern boundary comprises additional residential development with an area of woodland and a public right of way (PRoW) forming a break between these two areas. The western boundary comprises Crofton Cemetery which is separated from the Appeal Site by a mature hedgerow. The northern boundary comprises Oakcroft Lane. A line of mature poplar trees run along the line of the road.
- 2.3 Land to the north of Oakcroft Lane is bounded by Oakcroft Lane to the south and Peak Lane to the east. This parcel forms part of the wider gap that serves to separate Fareham and Stubbington. To the north is the route of the approved, and now implemented, Stubbington Bypass.
- 2.4 The Appeal Site is not subject to any formal landscape designation. The site does fall within the 'Strategic Gap' between Fareham and Stubbington, however this is a spatial designation and not a landscape issue. There are two Listed Buildings some 55m away from the Appeal Site to the south west, Old Crofton Church (Grade II\*) and Crofton Manor Hotel (Grade II). These Listed Buildings are located beyond a band of protected trees. The band of trees along the eastern boundary is protected by a Tree Preservation Order (TPO). The potential impacts on the Listed buildings will be addressed by others.
- 2.5 The site lies within the South Coast Plain National Character Area (NCA) 126.
- 2.6 As part of the FBC Landscape Character Assessment, the site falls within character area LC/A7 Fareham/ Stubbington Gap.
- 2.7 The relevant landscape characteristics of area LC/A7 are level or gently undulating landform, open, predominantly arable farmland and horticulture, a few

scattered farmsteads/horticultural holdings, some intrusion from neighbouring development of Fareham, Stubbington and HMS Collingwood and activity associated with airfield and a mosaic of small fragments of open farmland and horse-grazed pastures sandwiched between large-scale non-agricultural, but predominantly unbuilt, land uses.

- 2.8 As identified in the Hampshire County Integrated Character Assessment published in 2012, the site also falls within the Landscape Character Area 9F: Gosport and Fareham Coast Plain.
- 2.9 The relevant landscape characteristics of 9F are the low lying landscape which physically forms part of the coastal plain but is isolated from the coastline by the development. There are predominantly light soils which are utilised for agriculture. To the south, grassland pasture dominates while to the north there are large arable fields with no significant boundary vegetation. The area is strongly influenced by the adjoining urban areas of Gosport, Stubbington and Fareham, and by defence infrastructure.
- 2.10 It is agreed that it does not qualify as a 'valued landscape' for the purpose of Paragraph 170a) of the NPPF.

### **3.0 PLANNING HISTORY**

3.1 A full planning application (the 'First Application') was registered on 14 March 2019 (Application Reference: P/19/0301/FP) on the Appeal Site for:

*'Development comprising 261 dwellings access road from Peak Lane maintaining link to Oakcroft Lane, stopping up of a section of Oakcroft Lane (from Old Peak Lane to access road), with car parking, landscaping, public open space and associated works'.*

3.2 As part of the planning application, ACD Environmental Ltd undertook the following surveys, assessments, documents and drawings to inform the development proposals and support the planning application:

1. Tree Survey;
2. Arboricultural Impact Assessment;
3. Tree Protection Plan;
4. Arboricultural Method Statement;
5. Landscape and Visual Impact Assessment;
6. Detailed Soft Landscape Proposals;
7. Soft Landscape Specification; and
8. Landscape Management and Maintenance Plan.

3.3 The First Application was recommended for refusal, and FBC's Planning Committee subsequently resolved to refuse planning permission on 21 August 2019. The Decision Notice was issued on 22 August 2019. The 21 reasons given for the refusal of the First Application are as follows:

*'The development would be contrary to Policies CS2, CS4, CS5, CS6, CS14, CS15, CS17, CS18, CS20, and CS21 of the Adopted Fareham Borough Core Strategy and Policies DSP1, DSP2, DSP3, DSP5, DSP6, DSP13, DSP14, DSP15 and DSP40 of the Adopted Local Plan Part 2, and is unacceptable in that:*

*(i) the provision of dwellings in this location would be contrary to adopted local plan policies which seek to prevent residential development in the countryside;*

*(ii) the development of the site would result in an adverse visual effect on the immediate countryside setting around the site;*

*(iii) the introduction of dwellings in this location would fail to respond positively to and be respectful of the key characteristics of the area, in this countryside, edge of settlement location, providing limited green infrastructure and offering a lack of interconnected green/public spaces;*

*(iv) the quantum of development proposed would result in a cramped layout and would not deliver a housing scheme of high quality which respects and responds positively to the key characteristics of the area;*

*(v) the proposed development involves development that involves significant vehicle movements that cannot be accommodated adequately on the existing transport network. Insufficient information has been provided to demonstrate that the development would not result in a severe impact on road safety and operation of the local transport network;*

*(vi) the proposed access arrangement onto Peak Lane is inadequate to accommodate the development safely. This would result in an unacceptable impact on the safety of users of the development and adjoining highway network;*

*(vii) the proposal fails to demonstrate that the development would be accessible with regards to public transport links and walking and cycling routes to local services and facilities;*

*(viii) the development proposal fails to provide sufficient provision of, and support for, sustainable transport options. This would result in a greater number of trips by private car which will create severe impact on the local transport network and the environment;*

*(ix) inadequate information has been provided to assess the impact of the proposed works on water voles on site and any measures required to mitigate these impacts such as the provision of enhanced riparian buffers. In addition,*

*there is insufficient information in relation to their long-term protection within the wider landscape by failing to undertake an assessment of the impact of the proposals on connectivity between the mitigation pond created as part of the Stubbington Bypass Scheme and the wider landscape. The proposal fails to provide appropriate biodiversity enhancements to allow the better dispersal of the recovering/reintroduced water vole population in Stubbington;*

*(x) insufficient information has been submitted in relation to the adverse impacts of the proposals on the Solent Waders and Brent Goose Strategy Low Use Site and Secondary Support Area and any mitigation measures required to ensure the long-term resilience of these support networks;*

*(xi) the development proposal fails to provide adequate wildlife corridors along the boundaries of the site to ensure the long-term viability of the protected and notable species on the site and avoidance of any future conflicts between the residents and wildlife (e.g. badgers damaging private garden areas) due to the lack of available suitable foraging habitat;*

*(xii) in the absence of sufficient information, it is considered that the proposal will result in a net loss in biodiversity and is therefore contrary to the NPPF which requires a net gain in biodiversity;*

*(xiii) the development would result in an unacceptable impact on a number of protected trees around the periphery of the site;*

*(xiv) the submitted flood risk assessment fails to assess the impact of climate change on the development and therefore fails to demonstrate that the development is appropriately flood resistant and resilient;*

*(xv) the development would fail to preserve, and would result in less than substantial harm to, the historic setting of the Grade II\* Listed building Crofton Old Church;*

*(xvi) had it not been for the overriding reasons for refusal the Council would have sought to secure the details of the SuDS strategy including the mechanisms for securing its long term maintenance;*

*(xvii) the development proposal fails to secure an on-site provision of affordable housing at a level in accordance with the requirements of the Local Plan;*

*(xviii) in the absence of a legal agreement to secure such, the proposal would fail to provide satisfactory mitigation of the 'in combination' effects that the proposed increase in residential units on the site would cause through increased recreational disturbance on the Solent Coastal Special Protection Areas;*

*(xix) the development proposal fails to provide adequate public open space. In addition, in the absence of a legal agreement securing provision of open space and facilities and their associated management and maintenance, the recreational needs of residents of the proposed development would not be met;*

*(xx) in the absence of a legal agreement to secure the submission and implementation of a full Travel Plan, payment of the Travel Plan approval and monitoring fees and provision of a surety mechanism to ensure implementation of the Travel Plan, the proposed development would not make the necessary provision to ensure measures are in place to assist in reducing the dependency on the use of the private motorcar;*

*(xxi) in the absence of a legal agreement to secure such, the proposal would fail to provide a financial contribution towards education provision'.*

## 4.0 THE APPELLANT'S CASE

- 4.1 Following the refusal of the First Application, Persimmon Homes South Coast engaged in pre-application discussions with FBC for a Second Application.
- 4.2 An initial Pre-Application meeting between Persimmon Homes South Coast and FBC was held at FBC offices on 24<sup>th</sup> January 2020. During this meeting it was agreed that a scheme could be developed to overcome the reasons for refusal for the First Application. The landscape strategy of the scheme was suggested as being critical in order to successfully place a development in this edge of settlement location and incorporate frontage parking and a landscaping lung through the development.
- 4.3 It was agreed with the FBC Urban Design Officer, Dominic Lyster, that the appointed landscape architect (ACD Environmental Ltd) should be involved with pre-application discussions with the Council. ACD Environmental Ltd were specifically requested to produce three cross sections (approx. 15m wide) at the edges of the site to show how the transition from the housing, to the estate roads to the tree boundary of the site and then the adjacent roads would be designed to provide a robust planting screen and additional public open space.
- 4.4 A second Pre-Application meeting was held at FBC offices on 20<sup>th</sup> February 2021. ACD Environmental Ltd were in attendance. ACD Environmental Ltd presented a landscape strategy for a revised scheme along with the three cross sections, as described above.
- 4.5 The landscape strategy presented the landscape-led design approach for a scheme for 209 units to overcome the reasons for refusal on the First Application. Whilst the revised scheme addressed all of the reasons for refusal across a number of disciplines, the landscape strategy presented the following landscape elements:
1. A layout which reflected the landscape character of the surrounding area as an edge of settlement location, leading to a reduction of units, to spread out the built form and introduce more areas of landscape. This is in direct response to reason for refusal ii) '*the development would result in an adverse visual effect on the immediate countryside setting around the site*'.

- and part of reason for refusal iii) *'the introduction of dwellings in this location would fail to respond positively to and be respectful of the key characteristics of the area'*;
2. Specific request from the Urban Design Officer to increase the landscape buffers to the edges of the development in size and to form a continuous route around the development, with formal and informal pathways. This was also a direct response to part of reason for refusal iii) *'...providing limited green infrastructure and offering a lack of interconnected green spaces'*;
  3. Introducing further planting around the peripheral landscape buffers, including larger native broadleaf trees and mixed native understorey and hedgerow, especially along the northern and western boundaries where the site would form a transition to the rural edge and mitigating the potential visual impacts from the countryside and strategic gap. This is in direct response to reason for refusal ii) *'the development would result in an adverse visual effect on the immediate countryside setting around the site'*, and part of reason for refusal iii) *'the introduction of dwellings in this location would fail to respond positively to and be respectful of the key characteristics of the area'*;
  4. Introducing areas of public open space within the centre of the site, to allow for useable spaces for play and recreation, as well as providing opportunity for large scale broadleaf tree planting within the site. This is in direct response to part of reason for refusal iii) *'the introduction of dwellings in this location would fail to respond positively to and be respectful of the key characteristics of the area'* and reason for refusal xix) *'the development proposal fails to provide adequate public open space'*;
  5. The public open spaces within the site to form a 'green lung' through the development. This 'green lung' was to represent a strong green link through the development, from north to south, providing connectivity through the site, from the main access from Oakcroft Lane to the north, through the areas of public open space within the site, through to the pedestrian access and public right of way to the south at Marks Tey Road. The connectivity along this green link, between the public open spaces, included dedicated

wide public footpaths with landscaped verges and avenue tree planting. This is in direct response to part of reason for refusal iii) '*...offering a lack of interconnected green spaces*';

6. The alignment of the layout created dedicated viewing corridors through the site, from the settlement edge at the eastern boundary through to the cemetery to the west, retaining the visual connection as part of an edge of settlement location. This is in direct response to part of reason for refusal iii) '*...fail to respond positively to and be respectful of the key characteristics of the area*';
7. Utilising the east to west visual corridors to form natural divides through the development that can be characterised into three separate character areas. The character areas had a different approach to the landscape strategy to give the development greater identity and a greater sense of integration with the surrounding landscape. This is in direct response to part of reason for refusal iii) '*...fail to respond positively to and be respectful of the key characteristics of the area*';
8. Specific request from the Urban Design Officer to provide a trim trail around the site along the circular route, as opposed to the formal play provision of a Local Equipped Area of Play (LEAP); and
9. Specific request from the Urban Design Officer to introduce more tree planting and landscape beds amongst parking courts to enhance the visual amenity of these spaces.

4.6 The landscape strategy, landscape led approach and redesign were well received by FBC. The Urban Design Officer had some further comments as a result of the second Pre-Application meeting. The Urban Design Officer requested:

1. A wider landscape buffer to the northern boundary – this was accommodated and led to a further reduction in units to 206 to accommodate this request;

2. Hedges to be native species – this was addressed and delivered within the detailed soft landscape proposals as part of the Second Application;
  3. Enhancement of the southern area of the site with a native understorey mix – this was addressed and delivered within the detailed soft landscape proposals as part of the Second Application;
  4. Meadow planting to the eastern boundary with different levels of mowing regimes to create multiple habitats including path, amenity, meadow, tussocky and scrub – this was addressed and delivered within the detailed soft landscape proposals as part of the Second Application;
  5. A 1m wide circular route around site with a flowering lawn mix - this was addressed and delivered within the detailed soft landscape proposals as part of the Second Application.
- 4.7 Detailed landscape plans were prepared to support the Second Application, which addressed all of the above landscape comments and requests raised by the Urban Design Officer.
- 4.8 The Second Application went to Planning Committee on 17<sup>th</sup> February 2021 with an Officer recommendation to Approve. In the Officers report, it states:
- ‘The applicant has sought to address these numerous reasons for refusal with the current application submission having reduced the number of units of the site by 55 (21% reduction) and increased the level of landscaping both to the periphery of the site and throughout the site’.*
- 4.9 It goes on to say:
- ‘Reasons for refusal ii) and iii) raised concerns regarding the visual impact of the development, largely as a result of the overall density of the development and in particular how it impacted on the edge of settlement location.*
- ‘Landscape Consultants acting for the Council previously commented that the principle of the development of the site could be supportable, but significant care would be needed to ensure its edge of settlement location is carefully articulated with a robust landscaping belt to soften the appearance of the development when*

*viewed across the open landscape to the north. The current proposal reflects this approach and has increased the level of landscaping around the periphery of the site, particularly on the western side, adjacent to the cemetery.*

*'The development proposal comprises a wide range and mix of dwelling styles and types, including detached, semi-detached and terraced properties throughout the site, although lower density detached properties are more prevalent to the periphery of the site to soften the transition to the countryside to the north and west. The mature belt of poplar trees to the northern boundary of the site would be retained (with the exception of the site entrance) and would be re-enforced and enhanced with a generous landscaping belt along the northern and western boundaries.*

*'It is considered the lower density, together with the mix of property styles and types and the greater level of boundary planting and landscaping throughout the site will result in a scheme which is considered to be sensitively designed, reflecting the prevailing character of the adjoining residential estates to the east and south. These matters together with various green corridors and interconnected green spaces within and around the development site will significantly enhance the landscape setting of the development. The changes made to the scheme would ensure the visual impact of the development on the immediate countryside setting around the site, and the living conditions of residents in the site will be significantly improved above the earlier application. **Officers therefore consider that reasons for refusal (ii), (iii) and (iv) have been satisfactorily addressed'***

4.10 Despite the Officer recommendation for approval and confirmation that reasons for refusal ii) and iii) have been satisfactorily addressed, Members of the Planning Committee refused the Appeal and stated the same reasons for refusal as the First Application, without any further supporting evidence to do so.

## 5.0 CONCLUSION

5.1 The application was recommended for approval by officers. However, Members of the Planning Committee chose to disregard the advice of their officers and refused the planning application for 10 reasons. Two reasons relate specifically to landscape matters.

5.2 The first landscape reason for refusal is:

*'ii) the development of the site would result in an adverse visual effect on the immediate countryside setting around the site'*

5.3 As part of the First Application, ACD Environmental Ltd undertook a Landscape and Visual Impact Assessment to assess the visual effects of the proposed development. The conclusions were that the visual effects are constrained and localised given the flat topography of the area, strong vegetative network, and location of the proposed development behind existing properties and vegetative boundaries. The most affected receptors would be along the Oakcroft Lane, from Crofton Cemetery, a few locations along Marks Tey Road and the PRoW no 509 due to their proximity. Outside of the immediate vicinity of the development site there would generally be limited visibility of the development and any views would typically be partial or seen beyond the context of existing vegetation. The majority of visual receptors within the study area would experience negligible effects from the proposed development.

5.4 A development of this scale would expect to have visual impacts for locations along the site boundaries or from within the site. To mitigate the visual effects on the immediate countryside i.e. the northern and western boundaries of the site, in conjunction with the Pre-Application discussions and recommendations from Officers, the Appeal Scheme has increased the landscape buffers along the northern and western boundaries to form generous landscaping belts. The existing trees along these boundaries are being retained and have space to continue to grow to maturity. Within the landscape buffers, large, native broadleaf tree planting, along with mixed native understorey and mixed native hedgerow planting, have been provided to enhance the visual barriers. The density of housing has been reduced along the northern and western site boundaries, along

with the mix of property types and styles reflecting the edge of settlement character.

5.5 As a result, it is considered by the Appellant and the Officers that the Appeal Scheme would not have an adverse visual effect on the immediate countryside setting around the site'.

5.6 The second landscape reason for refusal is:

*(iii) the introduction of dwellings in this location would fail to respond positively to and be respectful of the key characteristics of the area, in this countryside, edge of settlement location, providing limited green infrastructure and offering a lack of interconnected green/public spaces;*

5.7 The first element of the reason for refusal is the '*introduction of dwellings in this location would fail to respond positively to and be respectful of the key characteristics of the area, in this countryside, edge of settlement location*'.

5.8 As part of the First Application, ACD Environmental Ltd undertook a Landscape and Visual Impact Assessment to assess the impact of the proposed development on the landscape character. The conclusions were that the overall effect on landscape character was negligible. In response to the refusal of the First Application and in conjunction with the Pre-Application discussions and recommendations from Officers, the Appeal Scheme positively responded to the edge of settlement location, by increasing the landscape buffers to form generous landscape belts, introducing further native planting, including large broadleaf trees, reducing the development density and varying the house types and styles to focus on detached dwellings to the northern and western parts of the Application Site. The landscape strategy also introduced landscape character areas within the site to give the development greater identity and a greater sense of integration with the surrounding landscape. As part of this, the landscape scheme included a higher degree of native planting and native hedgerows amongst the plot landscape to the northern and western areas.

5.9 As a result, it is considered by the Appellant and the Officers that the Appeal Scheme would respond positively to and be respectful of the key characteristics of the area, in this countryside, edge of settlement location.

5.10 The second element of the reason for refusal is the '*providing limited green infrastructure*'.

5.11 The Appellant considers that this objection is a hangover from the from the refusal of the First Application included essentially by error, because the point was addressed through the process of the Appeal Scheme.

5.12 The landscape strategy seeks to retain the majority of the existing trees and vegetation, with the exception of the small number proposed for removal to facilitate the single access. All of the retained trees and vegetation will fall within areas proposed as public open space to ensure the long-term sustainability of the vegetation. Public open spaces will be provided within the site and along the site boundaries and will be connected by open space, footpaths, tree lined avenues and visual corridors. The public open spaces, green links and built form are proposed on areas of former arable land that offers little ecological value. The detailed landscape scheme provides 129 new trees, 389m of mixed native hedgerow, a further 1,397m of native hedgerow in the plot landscape, 4,564msq of mixed native shrub planting, along with a significant amount of marginal, herbaceous, deciduous and wildlife friendly planting and a range of species rich wildflowers and grassland. The land to the north of Oakcroft Lane, which forms part of the Application Site, is proposed for use as biodiversity enhancement space and used to support the wider Solent waders and Brent goose network. The land would be transferred to FBC to ensure its long-term purpose as mitigation land. This would be secured through a Section 106 legal agreement. The development proposals can be considered to contribute positively to the wider green infrastructure.

5.13 The third element of the reason for refusal is the '*offering a lack of interconnected green/public spaces*'.

5.14 The Appellant considers that this objection is a hangover from the from the refusal of the First Application included essentially by error, because the point was addressed through the process of the Appeal Scheme.

5.15 In response to the refusal of the First Application and in conjunction with the Pre-Application discussions and recommendations from Officers, the Appeal Scheme

delivers a generous landscape belt around the periphery of the site. This belt has a circular path, which provides both public access and connectivity. Two public open spaces have been proposed. These two spaces are connected by a strong green link, forming a 'green lung' feature. The green links between these public open spaces are achieved by a continuous public footpath alongside large landscape verges with avenue tree planting. These green links connect to the public open space along the northern site boundary, at the entrance to the site, at Oakcroft Lane, which in turn provides connectivity to the north of Stubbington. This green link also connects to the public open space along the southern boundary and to the PRow no. 509 and onto Marks Tey Road. This green link provides both pedestrian connectivity and ecological connectivity with habitat corridors. Three visual corridors have been provided from east to west through the development, providing visual connectivity through the site. These features and design process undertaken to deliver these demonstrates significant provision of green/ public spaces and a clear connectivity of these spaces.

5.16 In conclusion, it is clear that there are no landscape grounds to refuse the application. The Appeal Scheme is in accordance with FBC's development plan and the NPPF. The Appellant will submit landscape evidence in support of the appeal.



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