

Oakcroft Lane, Stubbington

Review of Landscape and Visual Impact Assessment
 produced by ACD Environmental on behalf of
 Persimmon Homes
 (P/19/0301/FP)

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Job No: Oakcroft Lane, Stubbington	
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1.0 Background and scope of advice

- 1.1 This report has been prepared for Fareham Borough Council in response to the request for professional advice on the landscape and visual effects of proposed housing development on land to the south of Oakcroft Lane, Stubbington (Full Planning Application reference P/19/0301/FP).
- 1.2 The Application Site (red line boundary) comprises two parcels of farmland on the northern edge of Stubbington, bisected by Oakcroft Lane and totalling approximately 18.75ha in area. The arable field to the south of Oakcroft Lane (referred to as ‘the site’ within the application documents) is proposed for residential development of 261 dwellings with associated road infrastructure and open space provision. The majority of the farmland to the north of Oakcroft Lane will remain undeveloped and it is proposed that this will be handed over to the Borough Council (DAS p.26). However, a new access road linking the proposed housing development with Peak Lane and a proposed NEAP are to be located in the south east corner of this land.
- 1.3 Our review of the Landscape and Visual Impact Assessment (LVIA) prepared by ACD Environmental Ltd. in support of the application has involved the following tasks:
- review of the scheme proposals as set out in relevant supporting documentation, including the LVIA, DAS, Planning Statement, Site Layout Plan, soft landscape proposals and Ecological Impact Assessment;
 - review of the LVIA methodology in respect of relevant best practice guidance and our previous review of the LVIA scoping document (December 2018);
 - consideration of the potential effects of the proposals on landscape/visual resources and the integrity of the Fareham-Stubbington Gap, and in relation to current countryside protection and strategic gap policies and findings of the draft 2017 Fareham Landscape Assessment;
 - consideration of LVIA judgements and conclusions in relation to the above.
- 1.4 The advice reflects our professional judgement based upon a desk-based review of available information, a site visit and our existing extensive knowledge of the landscape of Fareham Borough and understanding of key policy issues. It has also been informed by our existing knowledge of local planning policy, best practice guidance and other studies of particular relevance to this work, including:
- best practice guidance on landscape and visual impact assessment¹, landscape character assessment^{2,3,4} and landscape sensitivity and capacity studies⁵;
 - relevant landscape character assessments for Fareham District and Hampshire⁶;
 - current development plan policy/guidance and other relevant studies of the area and policy issues (e.g. Strategic Gap and GI reviews/strategies); and

¹ Guidelines for landscape and visual impact assessment, Third Edition – LI/IEEMA (2013) – NB referred to as GLVIA3 in this report

² Landscape character assessment: Guidance for England and Scotland – SNH/Countryside Agency (2002)

³ An approach to Landscape Character Assessment – Natural England (2014)

⁴ Landscape Character Assessment Technical Information Note 08/2015 – Landscape Institute (February 2016)

⁵ Topic Paper 6: Techniques and criteria for judging capacity and sensitivity – SNH/Countryside Agency (2004)

⁶ Fareham Landscape Assessment – FBC (1996), Hampshire Integrated Character Assessment – HCC (2012)

- the draft findings of the Borough-wide Landscape Sensitivity Assessment that we have undertaken for the Council as part of the 2017 update of the Fareham Landscape Character Assessment.

1.5 Our comments are set out under headings that reflect the main sections of the LVIA, followed by a summary of the main points arising from our review and our overall conclusions and advice.

2.0 LVIA scope and methodology

2.1 Section 2.0 of the LVIA document provides a brief introduction to the site and proposals, the planning and designations context, the purpose of the LVIA, the methodology employed and the definition of the study area. Most of these factors are expanded upon in more detail elsewhere in the main text of the document and the accompanying appendices and we have provided comments as appropriate in relation to specific sections of the LVIA.

2.2 We have no particular comments to make on this introductory section other than to support ACD's stated purpose of the LVIA, the approach to the definition of the study area and the brief general statements made in paras 2.12-2.13 regarding the approach and methodology. However, we do have a number of comments regarding how this approach has been followed through in practice and the more detailed methodology statement set out in Appendix A, as set out below.

Scope of the assessment

2.3 The overall scope of the assessment is generally consistent with best practice but we note that the LVIA has taken account of some, but not all, of the key points raised in our review of the Scoping Document. Our comments regarding the selection of viewpoints have been taken on board (for the most part) but the assessment does not address the following:

- the potential for cumulative effects with other consented or well-advanced development proposals within the study area, particularly within the designated Strategic Gap;
- the effects of the proposed access link from Peak Lane and the introduction of the NEAP within land to the north of Oakcroft Lane (the LVIA focuses exclusively on effects arising from the development on land to the south of the lane);
- illustration of the potential effects of the development through the provision of photomontages, showing the changes to the existing view and effects of mitigation at year 1 and 15 following construction.

Assessment methodology

2.4 The assessment methodology described in paragraphs 2.12-2.13 and Appendix A would suggest that the LVIA has been carried out broadly in line with best practice, but there are some notable differences from the approach recommended within published guidance (GLVIA).

2.5 The assessment correctly makes the important distinction between *landscape effects* (i.e. effects on landscape as a resource) and *visual effects* (i.e. effects on views and visual amenity) and these are addressed separately, in line with best practice. Overall effects are derived from the sensitivity of landscape and visual receptors to change, combined with the magnitude of change that will arise as a result of the development proposals, which

also accords with GLVIA. However, there are other aspects of the methodology which, in our professional opinion are at variance with accepted practice or lack sufficient explanation or rigour.

- 2.6 The most significant of these is the assessment of landscape effects. The methodology described in paragraphs 9.1 to 9.11 of Appendix A departs substantially from the process recommended within GLVIA which has become accepted practice, in particular the approach to defining landscape sensitivity.
- 2.7 The LVIA Appendix A identifies four different factors ('quality', 'value', 'character sensitivity' and 'landscape visual sensitivity') that combine to give an overall judgement of 'weighted landscape sensitivity'. This is a departure from common practice where the *sensitivity* of landscape receptors (i.e. an area of distinctive landscape character and its defining features or characteristics) is derived by combining judgements of their *susceptibility* to change and the *value* attached to them (which should be clearly explained and justified within the landscape baseline).
- 2.8 The range of factors typically used to define the *value* of a landscape receptor are set out in LVIA guidance (see GLVIA Box 5.1, p.84). These have been widely used and accepted as a best practice approach to defining 'valued landscapes', including those that are not designated. Landscape quality/condition is cited as one of a range of factors that contribute to overall landscape value. Some of these factors have been identified in the LVIA but not in a format consistent with Box 5.1.
- 2.9 *Susceptibility* to change is the ability of a landscape receptor to accommodate change without 'undue consequences for the maintenance of the baseline situation and/or achievement of landscape planning policies and strategies' (GLVIA paragraph 5.40). Susceptibility is mentioned in LVIA Appendix A, paragraph 9.3 under Character Sensitivity and factors relating to this are included within the Character Sensitivity 'indicators' in Table C. However, the criteria by which levels of susceptibility are defined are not provided separately, nor are they clearly combined with different levels of landscape value to determine the level of sensitivity, in accordance with GLVIA.
- 2.10 The concept of 'landscape visual sensitivity' introduced within this LVIA (paragraph 9.4 and Table D) is not part of best practice in the assessment of landscape effects, and is more relevant to the assessment of visual effects, as suggested by LVIA paragraph 9.4:
- 'The visual sensitivity of an area of landscape relates to its general level of openness, the nature and number of visual receptors present within a landscape, and the probability of change in visual amenity due to the development being visible.'*
- 2.11 This demonstrates some confusion about the distinction between the effects of development on the character and distinctive features of the landscape itself and the effects on the visual amenity and enjoyment of people experiencing views of the landscape.
- 2.12 The LVIA method statement (paragraph 9.10) does go on to state that '*the overall landscape character effect is determined by the assessment of landscape sensitivity set against the magnitude of change as indicated by the matrix in the table below*' (Table F). This approach and the thresholds for the overall level (or significance) of landscape effects contained within Table F are consistent with best practice. However, there is no evidence in the LVIA that this approach has actually been applied for all landscape receptors.

- 2.13 Our comments on the scoping document (paragraph 2.4) make clear that we would expect all of the factors contributing to judgements of sensitivity (combining susceptibility and value), magnitude of change (combining scale, extent and duration) and level/significance of overall effects (combining sensitivity and magnitude of change) to be clearly explained/justified and tabulated in the LVIA, so that it is easy to follow how judgements on the level of effects have been derived. There is no such tabular presentation of landscape effects for different landscape receptors within the LVIA.
- 2.14 The lack of a table of overall landscape effects (equivalent to Table 2: Summary and comparison of overall residual visual effects) makes it difficult to understand the judgements made about the level of landscape effects described in the assessment. Appendix C provides some insight into how the level of sensitivity attributed to the landscape has been derived but this is presented for only a single landscape receptor, the 'Local Character Area', which is not clearly defined. From the accompanying description, this appears to refer to Landscape Character Area 7: the Fareham Stubbington Gap (as defined in the 2017 Fareham Landscape Assessment) within which the site is located. It is surprising that no reference has been made to the detailed findings of the sensitivity assessment for this area as expressed within the 2017 landscape assessment which would have provide useful context and justification.
- 2.15 It is also surprising that only one landscape receptor seems to have been assessed. LVIA paragraphs 7.3 and 7.5 indicate that 'landscape receptors' include the overall character of the site and its key defining features as well as the overall character and important features of the landscape within the surrounding area. We would have expected at least 3 different landscape receptors to be identified, i.e. the site itself, the immediate surrounding landscape to the north of Oakcroft Lane, and the wider LCA 7, as the development will affect these areas of landscape in different ways. The sensitivity, magnitude of change and overall effects relevant to each of these receptors should be assessed and clearly set out, ideally in tabular format, within the LVIA.
- 2.16 In the absence of this approach we consider that the LVIA is likely to have under-estimated the level of landscape effects, especially with respect to the landscape of the site itself. This is addressed further in a later section of this report.
- 2.17 The other main point regarding the methodology relates to the definition of visual receptors. Paragraph 9.12 of Appendix A states that '*the locations from which the proposed development will be visible are known as visual receptors*'; but this is incorrect. Visual receptors are always people who will be affected by changes in views or visual amenity at different places, not the viewpoints or views themselves, as made clear within GLVIA (para 3.21, 6.13). This misconception is also evident in paragraph 9.19 of Appendix A which states, "*the key visual receptors normally include statutory and non-statutory designated or protected areas, cultural heritage resources, residential properties and farmsteads, recreational/tourist resources, panoramic hilltop views, focused or direct views, and cumulative views. Viewpoints were selected to be representative of these visual receptor types.*" Such locations are not themselves the visual receptors but the people who frequent such locations are likely to be those most sensitive to, and affected by, changes in the views.

- 2.18 The incorrect notion of visual receptors being the viewpoints/locations, rather than the people experiencing the views, is also evident in the presentation of the overall residual visual effects (Table 2), where receptor type is given as a location rather than types of people who frequent these locations. This issue was picked up in our review of the scoping document (section 3.0) and we advocated that the LVIA should identify the main groups of people likely to be affected by the proposals and ensure that the viewpoints were selected to represent the views and visual amenity experienced by all potential receptors. While some additional viewpoints have been added to represent all receptor groups on the basis of our advice, the findings are still structured mainly around locations. This does not mean that the judgements in the LVIA are invalid but it requires the reader to make the link between the viewpoint locations and the different receptor groups affected.
- 2.19 Importantly, however, the LVIA appears to have disregarded this erroneous definition of receptor type within the assessment of visual receptor sensitivity (see paras 5.8-5.10 and Appendix A Table G), which is clearly related to the sensitivity of different groups of people to changes in their views and visual amenity, and follows a best practice approach.
- 2.20 Apart from these main points, we have no other substantive comments to make regarding the methodology used in the LVIA, although we do question some aspects of its application and the judgements made, as set out in section 7 below.

3.0 Policy context

- 3.1 Section 3 of the LVIA sets out the legislation, national and local development plan policies the Applicant considers to be of most relevance to landscape and strategic gap issues. We generally concur with this apart from the following points.
- 3.2 We agree that the general provisions of the NPPF and the paragraphs cited provide a relevant national policy context for the LVIA, apart from NPPF paragraph 119, which is not specifically related to landscape.
- 3.3 The LVIA rightly points to NPPF paragraph 170 as the key paragraph concerning the protection and enhancement of valued landscapes but the wording of this in LVIA paragraph 3.7 is confusing, suggesting that ‘valued landscapes’ only relate to sites of biodiversity or geological value and soils. This is not the case. The term applies to areas of landscape that are valued for their own intrinsic landscape qualities and characteristics. Other conservation interests (heritage or ecological) can add additional value to such valued landscapes but are not the primary determining factors.
- 3.4 The NPPF does not provide a definition of what constitutes a ‘valued landscape’. However, various High Court judgements and Appeal decisions have clarified that ‘valued’ landscape does not automatically equate to a ‘designated’ landscape but that, to be valued, requires the landscape to show some ‘demonstrable physical attributes’ that make it ‘in some way out of the ordinary’, or ‘beyond mere countryside’. The GLVIA Box 5.1 criteria have typically been used to assess landscape value in this context. This interpretation has been tested and accepted in two recent appeal decisions affecting the Meon Valley in Fareham (along with others elsewhere in the country).
- 3.5 The LVIA should recognise the significance of this concept in planning terms and assess the value of landscape receptors in accordance with the Box 5.1 criteria, in order to determine whether the site or surrounding landscape could be considered as part of a

‘valued landscape’. The 2017 Fareham Landscape Assessment (Part 2: Sensitivity Assessment) provides very relevant information on the characteristics of the landscape in LCA7 and should be referred to and used to inform this evaluation.

4.0 Baseline Information: Character

- 4.1 This part of the LVIA is intended to establish the existing baseline conditions of the landscape prior to the development, against which the effects of the proposals can be assessed.
- 4.2 According to GLVIA (para 5.3 and Figure 5.1), the landscape baseline should be established by using landscape character assessment as a tool to:
- provide a clear description of the existing landscape of the site and its context, i.e. landscape character and its defining characteristics (physical, aesthetic, perceptual and experiential); and
 - establish the value attached to the landscape or individual features within it.
- 4.3 Much of the initial information set out in this section of the LVIA is not relevant to the landscape baseline. The ecological and heritage designations listed in paras 4.2 and 4.11 are not landscape designations per se, and are only of relevance insofar as the presence of other ‘conservation interests’ can add value to the landscape (according to the evaluation criteria in GLVIA Box5.1). The section also includes descriptions of National Trails, PRoW and road network in the area, and the views and viewpoints associated with them, but these are relevant to the visual, not landscape, baseline.
- 4.4 In accordance with best practice, the LVIA refers to the relevant landscape character assessments at the national, county and Borough level, including the most up-to-date and detailed assessment of the local area, the 2017 Fareham Landscape Assessment. It briefly summarises the key characteristics set out in these assessments, including those for LCA 7: Fareham/Stubbington Gap (from the 2017 assessment), and states that the key characteristics of the LCA are ‘listed fully’ within Appendix H. However, this is not the case. For example, the appendix does not include the detailed and comprehensive information contained within Part 2 of the Fareham Landscape Assessment, which provides a significant amount of information relevant to the assessment of sensitivity, value and susceptibility to change for LCA7. In our view, it would be helpful for the LVIA to include a full extract from the 2017 assessment or make more detailed reference to it within the main text of the LVIA.
- 4.5 The site itself (i.e. land to the south of Oakcroft lane) is described under the heading Site Assessment in paragraphs 4.21-4.25 of the LVIA. This briefly describes the physical features of the site (its topography, land use and boundary vegetation etc.) but does not provide a very clear picture of its overall character and how this may differ from, or reflect, the distinctive characteristics of the wider landscape of the Fareham/Stubbington Gap to the north. There is also no clear sense of how much its character is influenced by its edge-of-settlement location, nor any description of perceptual, aesthetic or experiential qualities, or comment upon the general condition and intactness and representativeness of overall landscape character, not just the condition of the field boundaries. These are important factors that will influence judgements of susceptibility to change and landscape value as part of the LVIA process.

4.6 Significantly, the LVIA does not describe the character of the northern part of the overall Application Site (to the north of Oakcroft Lane) which has the potential to be both directly (through construction of the access road/NEAP) and indirectly affected by the proposed development. The character of this area will potentially change as a result of the construction of the consented Stubbington by-pass which, although not part of the existing baseline situation, will happen within the life of the proposed development and should, therefore, be taken into account within the LVIA.

4.7 Apart from noting that the site does not fall within the boundary of any designated landscape (LVIA para 4.3), the landscape baseline does not establish the value attached to the landscape of the site or the surrounding area, or the individual features within it, nor consider whether it forms part of a 'valued landscape' in terms of NPPF paragraph 170. However, landscape value is addressed within section 7 Assessment of Effects, with reference to Table B in Appendix A and its explanatory text. We comment on the approach and judgements made in this evaluation in section 7 of this document.

5.0 Baseline Conditions: Visual

5.1 According to GLVIA (para 6.3 and Figure 6.1), the visual baseline should establish (in more detail than is possible in the scoping stage):

- the area within which the development may be visible;
- the different groups of people who may experience views of the development;
- the viewpoints where they will be affected; and
- the nature of the views at those points.

5.2 The visual baseline in the LVIA addresses most of these points in some way and, overall, we consider that it is generally in line with best practice. However, it would be helpful to have a clearer description of the area within which the development may be visible, which takes into account the effects of vegetation, landform etc on the extent of visibility shown in the ZTV, and we reiterate our earlier comments on the rather confusing presentation of visual receptors as the viewpoint locations. The LVIA would be easier to follow if the visual baseline clearly set out the different groups of people who may be affected by the proposals, and then identified the viewpoints that have been selected to represent the views experienced by each group.

5.3 We commented upon this issue in our review of the scoping document and recommended that some additional viewpoints be included to cover certain groups that were not represented. We note that new viewpoints have been included and we are satisfied that the main groups are all now represented apart from drivers, pedestrians and cyclists travelling along Peak Lane, who we anticipate will have views of the new junction and access road and potentially the housing development itself. The LVIA should address these potential receptors.

6.0 Proposals and mitigation

6.1 This part of the LVIA summarises the main elements of the development proposals (with further detail provided in the site layout plan, the DAS and Soft Landscape Proposal plans) and the mitigation measures that have been designed into the scheme through an iterative process. These sound as if they have taken into account the main visual effects that might be anticipated and we endorse the general approach of setting back development and

retaining and strengthening existing vegetation around the site boundaries in order to minimise visual effects on surrounding areas.

- 6.2 However, there is evidently no mitigation planting proposed along the new junction and access road that cuts across the corner of the northern site area and encloses the proposed Neighbourhood Equipped Area of Play (NEAP). Without some visual containment, these will appear as incongruous features within the open farmland of the gap landscape and we would recommend the addition of tree/hedge planting, particularly along the western side of the access road, to reduce their potential visual impact.
- 6.3 We have scrutinised the site layout plan and more detailed soft landscape proposal plans closely in order to judge the potential effectiveness of the proposed mitigation. However, it is quite hard to read this from plans at very different scales and levels of detail, and a specific 'mitigation plan' which clearly shows the retention of existing features, areas of new planting and the creation of new features/habitats/GI would be very helpful. Ideally, this would be annotated to convey the rationale behind the proposals and the landscape and visual effects that they are designed to mitigate.
- 6.4 The production of photomontages from key viewpoints (as suggested earlier) would also be very helpful to illustrate how effective the proposed mitigation might be in reducing the visibility of the development and mitigating adverse visual effects.
- 6.5 The LVIA asserts that the proposed planting and creation of new landscape and GI features will be designed to be 'reflective of the local landscape', which is to be welcomed. However, there is no explanation or further details of what this means in the context of this particular site and the character of the surrounding local landscape.

7.0 Assessment of landscape and visual effects

Effects upon the receiving landscape

- 7.1 According to GLVIA (para 5.34):
- the first step in assessing landscape effects is to identify key landscape receptors, i.e. the components of the landscape that are likely to be affected by the scheme, such as overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects;
 - the second step is to identify interactions between these landscape receptors and the different components of the development at all the different stages, including construction, operation and, where relevant, decommissioning.
- 7.2 The LVIA does not clearly set out and describe the full range of landscape receptors that are likely to be affected, nor what the potential effects might be upon them. Paragraphs 7.3 and 7.5 indicate that the landscape receptors comprise:
- the overall character of the site itself (the part to the south of Oakcroft Lane);
 - the different elements within the site that make up its character;
 - the character of the landscape surrounding the site, as defined in local landscape character assessments.

- 7.3 In principle, this choice of receptors is in line with best practice but the LVIA does not appear to follow this approach through into the assessment. Only a single receptor, 'Local Character Area' (which apparently refers to the entirety of LCA7 including the site) appears to have been assessed according to Appendix C. As referred to earlier in paragraphs 2.13- 2.14 above, we would have expected at least 3 different receptors to be assessed (i.e. the site itself, the immediate surrounding landscape including the northern part of the site to the north of Oakcroft Lane, and the wider LCA 7) as landscape sensitivity, magnitude of change and overall effects will differ markedly between these areas.
- 7.4 We have already commented on how the LVIA does not follow best practice guidance in respect of the assessment of landscape sensitivity (including landscape value) and overall effects (see paras 2.6-2.12 above) and the lack of reference to relevant contextual evidence on landscape sensitivity for LCA7 contained within the 2017 Fareham Landscape Assessment.
- 7.5 Notwithstanding these methodological concerns, we have reviewed the judgements that are made using the applicant's own methodology and criteria, as set out in LVIA paragraphs 7.6-7.14 and Appendix C. We comment on these judgements on a point-by-point basis below in relation to our own judgements for the site itself (to the south of Oakcroft Lane) and the wider landscape character area.

Landscape quality (LVIA para 7.6)

- 7.6 We do not agree that landscape quality/condition either within the site or across the wider LCA7 should be judged as **low**. Neither the site nor the wider agricultural landscape is substantially degraded, as suggested by the definition contained in Appendix A, Table A. The site itself is well-managed as an arable field and is bounded by a largely intact structure of hedgerows and trees. There are no buildings or incongruous elements within the site itself and, while neighbouring houses to the south and east are partially evident, they do not significantly detract from the site's agricultural character or its landscape quality.
- 7.7 Landscape quality (and value) of LCA7 is set out in detail in Part 2 of the Fareham Landscape Assessment 2017 which sub-divides the LCA into 2 local landscape character areas sub-areas: LLCAs 7.1a and 7.1b. The former area includes the site and most of the wider landscape of the Fareham/Stubbington Gap but excludes the far eastern side of the area (i.e. LLCA7.1b) around the solar farm and STW at Peel Common, which are very remote from the site. An extract of the full assessment of this area is appended to this report, from which it can be seen that the assessment judges the intrinsic landscape quality/value of this LLCA (including the site) as **moderate to high**.
- 7.7 This difference in judgement comes down to a different interpretation of the degree of detracting or incongruous urban influences and the general intactness/condition of landscape elements across the area. The 2017 assessment acknowledges these factors but determines that they are relatively localised and do not have a significant detracting influence on the overall condition and well-managed, rural character of the agricultural landscape in this area. Based upon the criteria within Appendix A Table A, we would consider that the site and the wider LCA7.1a fit more accurately the category of **medium** landscape quality, i.e. 'Some landscape elements remain intact and in good repair. Some buildings are in local vernacular and materials and some detracting elements are evident' (ref Table A).

Landscape value (LVIA para 7.7)

- 7.8 We have already noted that the criteria used for assessing landscape value are not fully consistent with those set out in GLVIA Box 5.1 and the LVIA does not clearly describe how the judgement of **low** landscape value has been derived for the site or the wider landscape of the landscape character area. The explanation given in paragraph 7.7 (and Appendix C) simply repeats the generic ‘indicator description’ given in Table B in Appendix A and provides no specific justification in relation to the individual characteristics of the site/LCA. A clearer analysis of landscape value in accordance with the GLVIA Box 5.1 criteria would also assist in determining whether this area constitutes a ‘valued landscape’ (in terms of NPPF para. 170) within the context of the Borough.
- 7.9 The 2017 landscape assessment judges landscape value across the whole of the LCA7.1a area to be **moderate to high**, within the context of the Borough as a whole. However, based upon the wording of the criteria used in the LVIA (Table B, Appendix A), we would judge landscape value of the site and wider landscape to be somewhere between **medium and low**. The area is representative of the coastal plain landscape type (an increasingly rare resource within the Borough) and many of its characteristic and distinctive features are evident, notably its flat, open character and expansive views, sparse settlement pattern and generally undeveloped character, woodland blocks and hedgerows and other boundary vegetation. There are some individually notable landscape features (e.g. Oxley’s Wood, Tips Copse), and the area does have a coherent, aesthetically pleasing character and a strong sense of place. Its urban context is perceptible (more so within the site itself) but not dominating and we would argue that this constitutes a ‘low level of visual detractors’ (i.e. an indicator of medium quality landscapes according to the LVIA definition) as opposed to ‘frequent detracting visual elements’ (i.e. an indicator of low quality). The landscape structure of the coastal plain is recognisable across the gap area (including the site) and is not concealed by mixed land uses or development, unlike the wider urban area of Fareham beyond.

Character sensitivity (LVIA para 7.8)

- 7.10 We have already commented (paras 2.7-2.9) on the method used to define landscape sensitivity and how this does not follow the accepted approaches of separately assessing susceptibility to change and then combining this with different levels of landscape value in a clear and transparent way, to arrive at judgements of landscape sensitivity for each receptor. However, it is evident that some consideration has been given to the range of factors that influence both susceptibility to change and landscape value within the ‘Character Sensitivity indicators’, in Appendix A Table C, even though this is not set out in a very explicit way.
- 7.11 The justification provided in paragraph 7.8 states that the character sensitivity of the landscape has been defined as **low** for the following reasons:
- there are few important landscape elements of moderate susceptibility to change;
 - the area is subject to the presence of man-made infrastructure with a semi-enclosed scale;
 - in terms of remoteness the area is subject to human activity and development;
 - in terms of tranquillity it is subject to noise and movement.

7.13 It is not clear what area of landscape (the site, or the wider LCA7) or constituent landscape elements are being assessed, as the statements relating to ‘the landscape’ are completely unspecific. At the site level, we agree that the character of the site itself is already compromised to some extent by its semi-urban context on the edge of Stubbington, although we do not think the degree of influence of neighbouring housing to the south and east (and human activity, noise and movement) is as strong as the LVIA suggests. However, this does reduce its susceptibility to change compared with parts of the Fareham/Stubbington Gap that are more distant from the urban edge. Its ability to accommodate development is also enhanced over other more open parts of the gap landscape because of its well-vegetated boundaries and semi-enclosed character. Nevertheless, in our judgement, the site retains a relatively intact, well-managed and attractive, agricultural character of medium/low landscape value and medium susceptibility to change. We consider that the indicators for **medium** character sensitivity given in Table C reflect the characteristics of the site more accurately.

7.14 On the basis of the 2017 landscape assessment we would also rate the character sensitivity of the wider Fareham/Stubbington gap landscape as **medium**. The open, expansive character of the landscape cannot easily absorb development without changing its key characteristics, which increases its susceptibility to change. The sheer scale and expansive nature of the wider gap landscape serves to reinforce its dominant rural agricultural character and to increase a sense of relative isolation and remoteness from the urban influences that surround it. The area is sparsely populated with few man-made features within it and human activity does not dominate the area.

Landscape visual sensitivity (LVIA para 7.9)

7.15 As commented earlier (para 2.10), the concept of ‘landscape visual sensitivity’ introduced within this LVIA (paragraph 9.4 and Table D) is not a recognised part of best practice in the assessment of landscape effects. Certainly, the visual sensitivity of the site or surrounding area is a relevant consideration in determining the appropriateness of development within the landscape but only in terms of the effects this will have upon people and their visual amenity. It has no bearing upon the effects on landscape as a resource – a landscape resource can still experience significant damage or change to its intrinsic character and important elements as a result of development whether or not it can be seen. Hence the emphasis given in GLVIA to the vital importance of making a clear distinction between landscape and visual effects (GLVIA paras. 2.22 and 3.20).

7.16 We therefore do not consider these judgments to have any relevance to the assessment of landscape sensitivity and overall landscape effects. In any case, the LVIA appears to give lesser weight to this factor by stating (Paragraph 9.8) that:

“For the purposes of this assessment greater weight is attributed to Landscape Value and Landscape Character Sensitivity since these factors have greater defining criteria in the description of the landscape characterisation.”

Overall weighted assessment of landscape sensitivity (LVIA Appendix C)

- 7.17 The LVIA methodology in Appendix A, para 9.6 refers to ‘overall landscape sensitivity’ which combines “*the assessed values attributed to landscape condition, landscape value, character sensitivity and effects on landscape elements and landscape visual sensitivity, to define an overall value within the range of Very High, High, Medium and Low*”. It goes on to say that, “*since each criterion has a varying weight in its contribution to sensitivity the overall value is determined by professional judgement*” (para 9.7), but does not explain these weightings other than to say that greater weight is given to landscape character sensitivity and landscape value (as quoted above).
- 7.18 The LVIA assesses ‘overall, weighted landscape sensitivity’ for ‘the Local Character Area’ (given in Appendix C) as **low**. This evidently results from all of the contributory factors also being rated as low. **On the basis of the reasoning set out above, we would assess overall landscape sensitivity both within the site and the wider LCA as **medium** (combining medium quality, medium-low landscape value and medium character sensitivity).**
- 7.19 Paragraph 7.14 states that “*the overall weighted assessment of landscape sensitivity has been assessed as negligible*”, which conflicts with the judgement in Appendix C. However, we assume that there is a mistake in the wording and that this judgement actually relates to the overall landscape effects (i.e. the combination of sensitivity and magnitude of change), not overall sensitivity.

Magnitude of change (LVIA paras 7.10-7.13)

- 7.20 The LVIA assesses the magnitude of change to the landscape as a result of the development against the definitions set out in Appendix A, Table E and **judges the change to be **small****, i.e. “*there is likely to be minor loss or alteration to one or more key elements, features, characteristics of the baseline or introduction of elements that may be prominent but may not be uncharacteristic when set within the attributes of the receiving landscape. May not quite fit into the landform and scale of the landscape. Affects an area of recognised character.*”
- 7.21 **We accept that this may be an appropriate judgement at the scale of the wider LCA7** (i.e. the majority of the Fareham/Stubbington Gap area) within which the site is a relatively small component. However, this judgement cannot be supported at the site level (to the south of Oakcroft Lane) where, as the LVIA accepts, there will be wholesale replacement of an intact area of arable farmland with a housing estate. **This, in our view, must constitute a **large** change, as the site’s overall character will change out of all recognition, despite retention of existing vegetation around its boundaries.** It will in effect become part of the urban townscape of Stubbington, rather than part of its rural landscape setting.
- 7.22 The inclusion of aspects of landscape quality/value as part of the magnitude of change criteria (as shown in LVIA Table E) is not in line with best practice (see GLVIA paras 5.48-5.52). This advises that magnitude of change should be assessed in terms of the size and scale, the geographical extent, and the duration and reversibility of the effects on landscape receptors. This allows the degree of change affecting all landscape receptors of **whatever value** to be properly recognised. As LVIA Table E stands, only landscapes of high quality can be considered to experience a large magnitude of change, which does not make sense.

- 7.23 The next step in the process set out in GLVIA is to combine the magnitude of change with overall landscape sensitivity (which already takes account of value) to determine the level of overall landscape effects. The LVIA follows this part of the process, as set out in Appendix A Para 9.10 and Table F of the LVIA methodology.
- 7.24 There is barely any explanation within the LVIA of how the character of the site (to the north and south of Oakcroft Lane) and the wider landscape will be changed as a result of the development. In our view, this needs much fuller explanation and proper recognition of how the overall character of the landscape, and the key characteristics that define its character, will be affected by different elements of the proposals at both construction and operational (short and longer term) stages. This should be set out for all landscape receptors, i.e. the site itself (to the south of Oakcroft Lane), for the immediate surrounding landscape to the north and for the wider landscape of LLCA7.1a.

Overall landscape effects (LVIA para 7.14)

- 7.25 The LVIA assesses the overall landscape effects on the single landscape receptor of 'Landscape Character Area' as **negligible** (Paragraph 7.14) by combining a **low** sensitivity to change with a **small** magnitude of change in accordance with Appendix A, Table F. We consider this to be a significant under-estimate of the potential effects on the landscape of the site itself and also potentially the immediate area within the Fareham/Stubbington Gap landscape to the north of Oakcroft Lane.
- 7.26 Using the matrix set out in Table F and our professional judgement, we assess that the overall effects for the three key landscape receptors would be as follows:
- the site (south of Oakcroft Lane) – **medium** sensitivity to change combined with a **large** magnitude of change would result in a **major/moderate** landscape effect;
 - landscape of LLCA7.1a immediately to the north of Oakcroft Lane – **medium** sensitivity to change, combined with a **medium** magnitude of change (arising from introduction of the new access road/NEAP) would result in a **moderate** landscape effect;
 - wider landscape of LLCA7.1a – **medium** sensitivity to change combined with a **small** magnitude of change would result in a **minor** landscape effect.

Effects on views and visual amenity

- 7.27 We have already commented on the methodology used to assess visual effects within the LVIA, particularly the presentation of visual receptors as the viewpoints (e.g. in Table 2), rather than groups of people (see 2.17-2.19 above). Apart from this point (the implications of which are expanded upon below), we generally concur with the judgements of overall visual effects set out in Table 2.

Visual receptor type and sensitivity

- 7.28 Table 2 presents the assessment of visual effects in tabular form, setting out the receptor sensitivity, magnitude of change and overall effects at both the operational and residual stages against the 19 selected viewpoints. To reiterate our earlier comments, the table does not clearly identify the receptor groups/types that are represented by each viewpoint and lists 'receptor types' as types of locations (e.g. public road) rather than the type of people frequenting these locations and experiencing the view.

- 7.29 However, the effects on key receptor groups are summarised in LVIA paragraphs 7.17 to 7.23. It is important to note that, for some locations (e.g. Oakcroft Lane), there will be a range of users of differing sensitivity, including people in cars but also pedestrians, cyclists and horse riders who are more attuned to their surroundings and focused on the view. This means that for users of local roads (i.e. viewpoints 1, 5, 7 and 8) there would be also receptors of **high** sensitivity affected by changes in the view (in accordance with the definitions given in Appendix A, Table G).
- 7.30 LVIA paragraph 9.15 acknowledges that “*it is sometimes the case that different categories of visual receptor might be present at a selected representative viewpoint (e.g. a selected location may include both residential properties and workplaces suggesting different levels of sensitivity). In such cases, the primary receptor category is identified (usually the more sensitive).*” In this case, it would therefore be logical to increase the receptor sensitivity for these four viewpoints to **high**, rather than medium.

Magnitude of change

- 7.31 We agree with the LVIA judgements in Table 2 on the magnitude of change to the views and visual amenity experienced from the 19 viewpoints at the operational stage. We also generally agree that the magnitude of change to the existing views should reduce in the longer term (i.e. residual overall effects), assuming the successful establishment and growth of proposed screen planting along the northern and western boundaries of the site.
- 7.32 However, we consider that a ‘noticeable’ change from the existing view may also remain for views from the adjacent Crofton Cemetery (VP2), with elements of built development likely to remain visible above or through the hedgerow along the western site boundary. It is also possible that the changes in the view across the application site from the south may remain noticeable in the long term, for users of Marks Tey Road and local public rights of way/open space network (VP 3 and 4). However, as this is a relatively minor difference of opinion, we accept the judgements made in the LVIA in these cases.

Overall visual effects

- 7.33 The overall visual effects are derived by combining the sensitivity of the receptor group with the magnitude of change to the existing view, in accordance with the matrix presented in Appendix A, Table F. We agree with the great majority of the judgements made, with the exception of the effects on more sensitive receptors using Oakcroft Lane as part of the local access network for informal recreation (e.g. dog-walking, cycling etc.).
- 7.34 The changes in receptor sensitivity we have suggested above would result in a changed level of overall effects (from Table 2) for viewpoints 1 and 5, as shown in the table below (our judgements are shown in red, the LVIA judgements in brackets).

Viewpoint	Receptor sensitivity	Mag of Change (operational)	Overall effects (operational)	Mag of Change (residual)	Overall effects (residual)
1 Oakcroft Lane	High (Medium)	Large	Major (Maj/Mod)	Medium	Maj/Mod (Moderate)
5 Oakcroft Lane	High (Medium)	Large	Major (Maj/Mod)	Medium	Maj/Mod (Moderate)

- 7.35 The only other point relating to visual effects is the lack of assessment of potential effects on users of Peak Lane, in particular the visual effects of the construction of the new access road and NEAP between Peak Lane and the site. This was picked up in our review of the Scoping Document and an additional viewpoint to represent these users was suggested, but this has not been included within the LVIA. Peak Lane is not mentioned specifically anywhere in the visual assessment but Paragraph 7.23 states that “*other roads in the study area were visited, as they were indicated as having potential views on the ZTV, but no change could be appreciated*”.
- 7.36 We find this surprising in respect of Peak Lane and would anticipate that the new junction and access road off Peak Lane will affect the existing views available to drivers (of medium sensitivity) and pedestrians (of high sensitivity) using the footpath alongside the road. Given the relatively large number of people using this main road between Fareham and Stubbington and the links with the wider footpath network across the Fareham/Stubbington Gap, we regard this as a notable omission from the LVIA.
- 7.37 Paragraphs 7.24 to 7.33 is entitled ‘Summary of Landscape Character and Visual Impacts’ but it does not provide a summary of effects. Instead, it simply reiterates the description of the site, the proposed development and mitigation measures without any reference to the findings of the landscape and visual assessment.

8.0 Effects on the strategic gap

- 8.1 We agree with the conclusion of the LVIA (paragraph 8.10) that the development of this site would not impact significantly on the separation of Fareham and Stubbington nor compromise the overall integrity of the designated Strategic Gap.
- 8.2 The site lies immediately adjacent to existing housing on the northern edge of Stubbington and the proposed development would extend the urban edge only marginally further to the north beyond its existing limit. This would have no discernible effect on the physical distance between and separation of the two settlements.
- 8.3 Oakcroft Lane acts as a strong defensible boundary behind which the development would be contained, forming a clearly defined new settlement boundary for Stubbington. The existing vegetation cover along the lane and the northern edge of the site provides some existing visual containment and this will be strengthened as part of the development proposals. As a result, the development should not intrude visually into the more open landscape of the gap to the north (although the access road will require careful integration) and the visual separation of the two settlements should be effectively maintained.
- 8.4 The overall ‘sense of separation’ is determined by a perception of moving from one place, through a distinctly different area before entering another place, and recognising where each place starts and finishes. The perception of where Stubbington ‘begins’ when travelling southwards along Peak Lane may be marginally affected by the construction of the new access road some distance further to the north of the current perceived settlement edge at the intersection of Oakcroft Lane and Peak Lane. However, maintenance of existing vegetation cover in this area and additional planting along the new access would help to reduce this effect.

9.0 Summary and overall conclusions

9.1 An abbreviated summary of the key points arising from our review is set out below, followed by our overall conclusions on the effects of the proposals and the assessment presented within the LVIA.

LVIA scope

9.2 Key comments in relation to the scope of the LVIA:

- the scope of the LVIA is generally consistent with best practice;
- it takes account of most of our previous comments on the scoping document in relation to selection of viewpoints, but does not include a new viewpoint to represent users (drivers, cyclists, pedestrians etc.) of Peak Lane;
- the assessment does not address our previous comments regarding: potential for cumulative effects; effects of proposed access link from Peak lane and introduction of NEAP on land to north of Oakcroft Lane; illustration of potential effects using photomontages.

LVIA methodology

9.3 Key comments in relation to the LVIA methodology:

- the LVIA has been undertaken broadly in line with the process set out in published guidance (GLVIA) but some aspects differ from accepted practice or lack adequate explanation or justification;
- the most significant of these is the assessment of landscape effects, especially the approach to defining landscape receptors, landscape sensitivity and value;
- another key point is the erroneous definition in parts of the assessment of visual receptors as locations/viewpoints rather than people, although this does not affect LVIA judgements, only clarity of findings.

Policy context

9.4 Key comments in relation to the policy context:

- the LVIA correctly identifies the most relevant national and local planning policies, apart from NPPF paragraph 119 which is not specifically related to landscape;
- NPPF paragraph 170 is correctly highlighted as the key paragraph concerning protection and enhancement of valued landscapes but this relates to landscapes of intrinsic value, not sites of biodiversity or geological value as LVIA appears to suggest;
- the LVIA should recognise the significance of 'valued landscape' in the context of the NPPF, adopt GLVIA Box 5.1 criteria as the accepted evaluation method and refer to relevant information contained within 2017 Fareham Landscape Assessment as part of evidence base for assessing landscape value.

Landscape and visual baseline

9.5 Key comments in relation to the landscape (character) baseline:

- the LVIA refers to the relevant landscape character assessments at the national, county and Borough level but a more comprehensive extract from the 2017 Fareham

Landscape Character Assessment is needed to describe the key characteristics, qualities and sensitivities of the landscape context of LCA7: Fareham/Stubbington Gap;

- the description of the application site (to the south of Oakcroft Lane) does not clearly convey its overall landscape character and how representative this is of the wider landscape context of the gap;
- other key factors of the application site are not fully or clearly described, e.g. its specific perceptual, aesthetic or experiential qualities, its general condition and intactness and the degree to which its character is influenced by its edge of settlement location and neighbouring built form;
- the LVIA does not specifically describe the overall character and typical characteristics/qualities of the northern part of the site (to the north of Oakcroft Lane) as part of the baseline and how this will change with construction of the consented bypass;
- the landscape baseline does not include an evaluation of landscape value (as advised in GLVIA) but this is covered in section 7 Assessment of effects.

Key comments in relation to the visual baseline:

- the visual baseline is generally in line with best practice;
- clearer description of how vegetation, landform and buildings affect the actual extent of visibility (i.e. refinement of ZTV on the ground) would be helpful;
- new viewpoints have been added in response to our comments on the scoping document and we are satisfied that all potential visual receptors (groups of people) are now represented, apart from users of Peak Lane who are not mentioned in the LVIA;
- in places, the LVIA confusingly refers to visual receptors as locations/viewpoints instead of people. It would be easier to follow if the visual baseline clearly set out the different groups of people who may be affected by the proposals and then identified the viewpoints that have been selected to represent them and the nature of the views at these points.

Proposals and mitigation

9.7 Key comments in relation to the mitigation proposals:

- we endorse the general approach of setting back of development from the site boundaries and retaining and strengthening existing boundary vegetation to minimise visual effects, particularly along the northern edge of the site;
- no apparent mitigation planting is proposed around the new road junction and access road within northern site area – this is needed to help integrate these features within the open farmland and to minimise their visual intrusion;
- a separate, annotated ‘landscape mitigation plan’ showing retention/enhancement of existing features, creation of new features/habitats/GI etc. would help to explain what the proposals are designed to achieve in mitigating effects and providing landscape enhancement;
- photomontages would also be useful to illustrate the effects of mitigation over time;
- further explanation of how the design of the scheme and landscape proposals will ‘be reflective of the local landscape’ is needed, with reference to key characteristics of the local area.

Assessment of landscape and visual effects

9.8 Key comments in relation to the assessment of landscape effects:

- the LVIA does not clearly set out and describe the full range of landscape receptors (as defined in GLVIA) that are likely to be affected, nor what the potential effects on each receptor might be;
- only a single landscape receptor, 'Local Character Area', is assessed (assumed to include the entirety of LCA7 and the site itself);
- we consider that the LVIA should identify at least 3 landscape receptors: the site (S of Oakcroft Lane); immediate surrounding area (N of Oakcroft lane); and wider LCA7 landscape, as potential landscape effects will differ markedly between these areas;
- other aspects of the LVIA methodology differ from best practice guidance (e.g. approach and criteria used for assessing landscape quality, value, susceptibility to change and overall sensitivity);
- particular attention should be paid to whether the site or wider area can be judged to be a 'valued landscape' in the context of NPPF paragraph 170.
- as a direct outcome of these methodological differences, we consider that the LVIA under-estimates the overall effects on the receiving landscape, particularly of the site itself but also the immediate surrounding landscape to the north;
- we consider that the residual landscape effects would be **major/moderate** and **moderate** respectively for these receptors, rather than negligible as judged in the LVIA;
- we agree that there will be reduced effects on the wider landscape of the gap (LCA7) and that these are correctly assessed as **negligible**.

9.9 Key comments in relation to the assessment of visual effects:

- aside from the definition of visual receptors, we broadly agree with the LVIA approach and findings for the assessment of overall visual effects;
- we agree that the potential visual effects of the development will be relatively localised and that the most affected receptors will be those people viewing the site from close quarters immediately around the site (from viewpoints 1, 2, 3, 4 and 5) and from the PRoW crossing open farmland to the north of the site (viewpoint 6);
- we concur with the LVIA judgement that there will be **major** or **major-moderate** effects on these receptors during the operational stage, reducing to **major-moderate** or **moderate** effects once mitigation planting has matured;
- we have suggested 'up-grading' the level of operational and residual effects (to **major** and **major-moderate** respectively) on users of Oakcroft Lane (VP 1 and 5), to take account of more sensitive receptors (e.g. pedestrians, cyclists etc.), not just car drivers, using this route;
- apart potentially from users of Peak Lane (an important omission from the LVIA), the visual amenity of the majority of people within the wider study area will remain largely unaffected by the development.

Effects on Strategic Gap

9.10 Key comments in relation to the effects on the Strategic Gap:

- we agree with the conclusion of the LVIA (paragraph 8.10) that the development of this site would not impact significantly on the separation of Fareham and Stubbington nor compromise the overall integrity of the designated Strategic Gap;
- there should be no discernible effect on the physical, visual and sense of separation between the two settlements, as long as screen planting along the site boundaries is properly maintained and the new access road is effectively integrated within the more open gap landscape to the north of the site (additional mitigation planting is needed to achieve this);
- the proposals are therefore compliant with Strategic Gap policies.

Discussion and overall conclusions of LVIA review

9.11 The review has identified a number of methodological and presentational issues that are not entirely in line with LVIA best practice guidance, and which raise some questions about the comprehensiveness of the assessment and the underlying rationale and rigour of some of the judgements made within it.

9.12 A key part of this is to do with how the individual receptors of effects have been defined, especially the lack of any assessment of landscape effects on the site itself and the immediate surrounding landscape context. This has, in our view, led to an underestimate of the effects of the proposals on landscape character at the site and local levels (we assess the effects to be major-moderate and moderate, compared to the LVIA's assessment of negligible).

9.13 However, broadly speaking the approach follows the spirit, if not the letter, of best practice guidance and the majority of the judgements made in the assessment are in line with our own expectations, particularly those relating to visual effects. We have only relatively minor differences in professional opinion or approach that do not significantly sway the overall outcome of the visual assessment.

9.14 Regarding landscape effects, there is no question that the character of the site itself will be fundamentally changed from a parcel of well-managed farmland with a predominantly rural character to a suburban housing estate, despite important vegetation cover within and around the site being largely retained. Part of the wider landscape resource of the Fareham/Stubbington Gap will therefore be irrevocably lost and this constitutes a **major/moderate** permanent, adverse landscape effect. However, the effects of this change will remain relatively contained and the urbanising influence of the development would not extend much beyond Oakcroft Lane, so long as existing roadside vegetation is maintained and enhanced and the new access road on the northern side is sensitively integrated within new planting. We strongly recommend that additional mitigation measures are included within the scheme to limit the intrusion of the new access road and junction on the character of open countryside to the north of Oakcroft Lane. In this event, the potential effects on the landscape resources of the gap will, in our view, range from **moderate** to **minor**, with increasing distance from the site.

- 9.15 From a visual perspective, the site is undoubtedly well-contained visually by boundary vegetation and neighbouring housing. The LVIA has demonstrated that the most important visual effects of the development would be localised and restricted to people using the network of footpaths, minor roads and public spaces (including Crofton Cemetery) in the immediate vicinity of the site. Existing strong vegetation cover, supplemented by additional planting, would also limit most views of the development from neighbouring residential areas and from publicly accessible places within the wider Fareham/Stubbington Gap. So, while the residual visual effects are judged as **major/moderate** for viewers in close proximity, the visual amenity of the great majority of viewers within the study area will be unaffected.
- 9.16 The LVIA extolls the benefits of the scheme design and landscape proposals in mitigating potential landscape and visual effects and providing positive landscape and GI benefits that will 'be reflective of the local landscape'. It is not clear from the LVIA, DAS or supporting plans exactly how local landscape character has informed the scheme design or will be reflected in the creation of new landscape features, such as the balancing pond and areas of open space within the development. We recommend that a separate plan is produced, together with supporting explanation, to illustrate the landscape response within the scheme design and the rationale behind the mitigation proposals.
- 9.17 We agree that the proposed development would not compromise the integrity of the Fareham/Stubbington Strategic Gap - it would not have any discernible effect upon the physical, visual or perceived sense of separation between Fareham and Stubbington. However, the proposed new access road and junction with Peak lane would need to be integrated as sensitively as possible within new planting to reduce any sense of the edge of Stubbington creeping further northwards.
- 9.15 The overall conclusion of the review is that the LVIA approach and findings are essentially sound, albeit with some room for improvement in terms of clarity of rationale and presentation and some adjustments in approach to more closely reflect best practice as set out in GLVIA (in particular, definition of receptors, assessment of landscape value and sensitivity). In addition, we would recommend the provision of additional descriptive and illustrative material (e.g. plans and photomontages) to help explain the rationale behind the LVIA judgements and the design of the scheme and landscape/mitigation proposals.

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