

26 March 2021
Delivered by email

Ref: RESS3014

Richard Wright
Fareham Borough Council
Civic Offices
Hampshire
PO16 7AZ

Dear Richard,

FURTHER LANDSCAPE RESPONSE - LAND SOUTH OF FUNTLEY ROAD, FUNTLEY

On behalf of Reside Homes, please see below our formal response to the Landscape consultation response (prepared by Lockhart Garratt and dated 3rd March 2021) in relation to the current proposal for 125 units on land south of Funtley Road, Funtley, (planning reference P/20/1168/OA).

In December 2020, you raised landscape concerns over the proposed development, which in recent conversations you have reiterated, even though we have submitted further supporting information. It was agreed that the Council would instruct a third party consultant to review the scheme on behalf of the Council. Having reviewed the landscape consultant's response (dated 3rd March 2021), we have a number of concerns regarding this response, not least in terms of a number of factual inaccuracies and that the author has not visited the application site, nor made this clear in his report. It is our view that the landscape consultation response is flawed, and therefore for the reasons we set out below, we formally request that this response is 'set aside' given these concerns, or at the very least revisited.

Amended plans

In support of our response on this matter, we have also prepared the following updated plans which we request supersede those previously submitted:

- Illustrative Layout Plan (Drawing No. RD1731-F3-L100 P2)
- Parameters Plan (Drawing No. RD1731-F3-L107 P2)

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- Overlay Plan of the previously parameter plan (Drawing No. D2546_032_REVI) approved under the outline planning application reference P/18/0067/OA and the proposed Parameter Plan (Drawing No. RD1731-F3-L107 P2)

For clarity, both the Illustrative Layout Plan and the Parameter Plan have been amended so that the development parcels are solely contained within the proposed allocation boundary for Policy HA10 of the emerging Fareham Local Plan 2037 (November 2020). Although this Plan has now been further delayed, as announced in February 2021, this draft document and its earlier iterations proposed the allocation of this site for development, albeit for 55 dwellings.

We therefore request that these drawings are accepted by the Council and formally consulted upon. We have also prepared an overlay plan that compares the Parameter Plan (D2546_032_REVI) previously approved under the outline planning application reference P/18/0067/OA with the proposed parameter plan subject to consideration in this current application. This provides a clear comparison between the approved and proposed scheme and shows that the two schemes are very similar in terms of the built form, open space arrangements.

Extant planning permission and site promotion

As set out in our Planning Statement, the principle of development at this site has been established. In September 2020, outline consent (planning reference P/18/0067/OA) was granted for 55 dwellings.

This revised outline planning application proposes a revised development of up to 125 homes, which our supporting documents establish the site's capacity to be able to accommodate the nature and scale of scheme proposed. Full details on the scale, appearance, landscaping and layout of the scheme will be subsequently submitted through a reserved matters application.

The site has also consistently been promoted by the applicants for circa 120 dwellings, compared to the 55 dwellings proposed in the emerging draft Local Plan. We do not repeat those submissions here, but must note that the Council has to date provided no reasoned justification for its proposed dwelling yield on this site. Further, in our submission we have highlighted issues and concerns regarding the supporting landscape and emerging policy approach.

Response to Landscape Consultant

In your email dated 10th March 2021, it was confirmed that the Landscape Consultant did not undertake a site visit, prior to writing up his formal response to the Council. This was not disclaimed in his response. The purpose of a site visit should be to inform and assess the following:

- The topography of the Site and its context;
- Landscape elements within the Site and their condition;
- Openness and enclosure of the Site;
- The field pattern of the Site and its context;

- Sense of tranquillity/remoteness experienced from within the Site;
- The relationship of the Site to the existing settlement; and
- Visibility of the Site in its surrounding landscape context and key views from/into the Site.

The fact that the Landscape Consultant has not visited the site and has not assessed the above aspects, is unacceptable.

A Desk Based Assessment of the site has only been undertaken, solely from the limited information provided by the Council. The Briefing Note provided to the consultant by the Council contained the Urban Designer's consultation response, which was disparaging towards the scheme and appears to have influenced the Landscape Consultant's response. The Briefing Note was therefore leading and not impartial.

The Landscape Consultant has undertaken an assessment of the proposals and drawn conclusions and made assumptions based purely on published information. This has resulted in a number of significant errors / inaccuracies in the response, which are discussed in more detail below.

Local Plan Review

The Landscape Report places significant weight on the emerging Fareham Borough Council's Publication Local Plan.

In November / December 2020, the Council consulted on the Publication Local Plan, with housing need based on the Government's revised standard methodology at that time. Two days before consultation closed, the Government confirmed the use of the existing standard methodology rather than the revised version. The consequence of this is that the Council must revisit the housing requirements in the Local Plan and the proposed sites required to meet this much higher number circa 2,000 homes.

The Council's Executive Leader confirmed on 1st February 2021, that *'amendments may be put forward both in light of the Government announcement on housing need but also the responses we have received to this consultation and the Council will carefully consider alterations in order to add greater certainty to the plan being found sound at examination'*. Further consultation on the Local Plan Review is due to place in summer 2021, with adoption scheduled for 2023. The Draft Plan will gain more weight as the plan advances to adoption. However, the Council acknowledges that alterations will be required to the Local Plan in order for it be found sound.

As such the Publication Local Plan currently holds no weight, given the objections to the plan and the landscape policies, and the assessment of this current application must be against the policies of the adopted development plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise. Therefore, alongside the Development Plan which comprises the Local Plan Part 1: Core Strategy and the Local Plan Part 2: Development Sites and Policies Plan, this proposal must be assessed against the National

Planning Policy Framework 2019 (NPPF), and other relevant guidance and material considerations. These material considerations include the extant approval at this site.

The [125]-unit scheme (as now amended) proposes that built development element will be located solely within the area consented for 55 houses, and within the draft site allocation boundary, achieving greater numbers through the refined layout, and through a gradation of densities to reflect local character. The Council has accepted that the allocation is appropriate and have consented the 55-unit scheme thus accepting that it is not harmful to local character or visual context.

Only the proposed open space and landscaping extends beyond the draft allocation boundary, including that associated with the immediate environs of the housing and the Community Park to the south. It should be noted that the proposals for the housing and the Community Park (which is on land that rises southwards to 55mAOD) should be considered in tandem, as they provide integrated and complementary proposals for landscape repair and improvements and will be delivered with a single s.106 agreement. These provide a seamless addition to the green infrastructure network and a comprehensive approach to landscape improvement to southern part of the Funtley triangle. They also result in an improved landscape setting to that considered in the landscape report, noting that the community park too has been approved previously.

It should also be noted that the southern edge of the built development, as applied for in this updated scheme, and as assessed by the Council's landscape consultant, rises to the 30m AOD contour level (so only 5metres above the previously consented scheme) and extends only 40 metres further south than the consented scheme, against consultant's reported 100m extension further south. These assumptions were clearly incorrect and the assessment has therefore been made based on incorrect facts.

The 30m contour is where the gradient of the slope becomes more pronounced and was considered to be the appropriate place for the edge of development, responding to the landform and landscape features. We have, however, now revised the Illustrative Masterplan and Parameter Plan to pull the built development 10m back to within the emerging local plan's allocation boundary.

As explained in the application submission, the proposals for the 125 unit scheme are landscape-led based upon careful consideration and study of the historic landscape and changes that have taken place in the past two centuries to alter it. These have included:

- The partial loss of woodland on the valley sides and horizons (formerly woodland managed as coppice for the brickworks), mainly during the first half of the 20th century;
- Physical and visual isolation of the Funtley triangle (from the adjacent Meon Valley and Downland landscapes) by infrastructure (the deviation line, M27 and mainline railway); this has also resulted in changes to perceptual qualities, notably noise intrusion and tranquillity;
- Housing development north of Funtley Road, replacing the brickworks and abbatoir as well as further infilling in the latter half of the 20th century to present day;
- Recent planning permission for 27 homes (currently under construction);

- Grazing land replaced by horse paddocks and associated structures, leading to loss of the characteristic small-scale field patterns and associated hedgerows, replaced by a network of paddock fencing, stables and other associated clutter;
- Allocation and outline consent for residential development and a community park on land to south of Funtley Road; and
- Major redevelopment of Knowle village on the highest part of this local landscape;
- In the future the wider landscape, to the north-east, will see significant change with the development of the new settlement of Welborne. This will be readily visible from the higher ground within Funtley triangle and will change perceptual and visual qualities further.

As set out above, the Landscape Report prepared by Lockhart Garratt has undertaken an assessment of the proposals and drawn conclusions on its impact on landscape character and visual amenity (and therefore policy) solely through information provided by the Council.

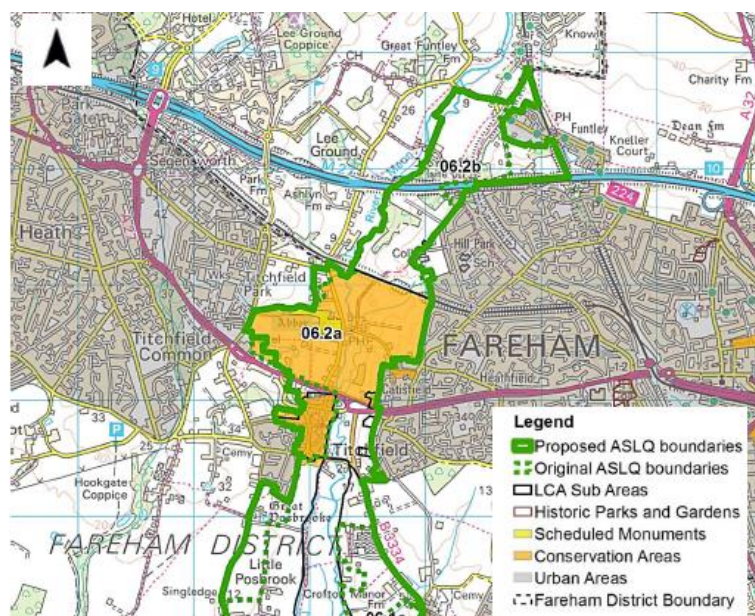
Had the consultant visited the site, the conclusions with respect to how closely the site exhibits the key characteristics of the character areas and type's hierarchy would have, almost certainly, been different. For example, within the South Hampshire Lowlands NCA the *'intimate and enclosed field pattern with many small and irregular fields generally bounded by mixed species hedgerows or woodland'* is no longer true within the Funtley triangle due to changing land uses and loss of landscape features. Similarly within the FBC Landscape Character Assessment, 2017, the characteristics highlighted as typifying the area: *'a mosaic of open farmland (part of the wider coastal plain farmland), minor wooded valleys and smaller, enclosed pastures bordering the valley to the south of Titchfield....'* is cited as being evidence that the site is moderately representative of the character of the Meon Valley. This characteristic is clearly not relevant to the Funtley triangle since it is referring to land within the coastal plain south of Titchfield.

Whilst some landscape features remain, within the Funtley triangle, such as the remnant woodland on the valley sides and horizons, that are also seen within the Meon valley LCA, the Funtley triangle is physically and visually separated from the Meon valley by the wooded Deviation Line. The wooded hillsides and horizons, which are a defining feature of the southern parts of the site and surrounding area are also relevant to the adjacent downland landscapes to the north-east. The Funtley triangle part of the Meon Valley LCA is also recognised, in the district character assessment, as being strongly affected by urbanising influences including the M27 corridor. Again, the horseyculture uses with paddock fences and associated clutter replacing the characteristic small-scale field patterns of the valley floor, are significant detracting influences, which become obvious on visiting the site. As noted above, there appears to have been no consideration of the potential impact of the approved community park on this landscape.

Local Plan Review and proposed Area of Special Landscape Quality (ASLQ)

The Local Plan Review has identified eight Areas of Special Landscape Quality, which are to be protected and enhanced under Policy DS3: Landscape. In September 2020, the Council published a 'Technical Review of Areas of Special Landscape Quality and Strategic Gaps' to support the Local Plan Review. Part of the application site is identified within the proposed Area of Special Landscape Quality (Meon Valley), see Map 1 below. We have responded to the

local plan consultation, objecting to these designations and on that basis alone they hold no weight before they are now considered by an Inspector. In addition, we would note that of the three Reg18 plans produced in recent years, all based on the council's 2017 landscape assessment work, only the most recent plan has proposed these designations. The adopted plan only designates this land as Countryside.



Map 1: Proposed Meon Valley Area of Special Landscape Quality

The landscape consultant also appears to have attached considerable weight, in his arguments leading to his assessment of 'significant' landscape harm, to the proposed inclusion of the unbuilt and unallocated areas within Funtley triangle in the proposed Meon Valley Area of Special Landscape Quality (ASLQ) within the emerging Local Plan. He clearly has not had sight of our detailed representations on this matter.

We were advised by Emma Younger, Planner (Strategy), at the Council in an email dated 14th February 2020 that:

"The areas of special landscape quality in the draft local plan supplement are indicative and form part of the consultation. It is important that these areas are accurately defined and as such we would value your views on this in the form of a consultation response."

The applicant has submitted a number of representations to the Council regarding ASLQ's, with a supporting LVIA Technical Note that supported our objection to the Meon Valley ASLQ. The case for inclusion of the undeveloped parts of Funtley triangle in the ASLQ appears to be based solely on the fact that the Funtley triangle is placed within the Meon Valley LCA within the 2017 district Landscape Character Assessment, although then omitting the built and allocated areas. This is despite the district character assessment noting that there are many detracting elements within this part of the LCA that reduce its sensitivity. These include the severing effects of infrastructure, the noise from the M27, development and the increase in horse paddocks.

GLVIA guidance notes that 'valued landscapes' should be intact and in good condition and where scenic quality, wildness or tranquillity, and natural and cultural heritage features

contribute to landscape quality. Taking this into account, it is hard to see how the southern parts of the Funtley triangle qualify to be included in the Meon Valley ASLQ, particularly given FBCs own definition which states that landscapes designated as ASLQ should be 'unique, exceptional or distinctive'.

The representations of March 2020 also set out a number of reasons why the boundary of the ASLQ should be defined by the Deviation line, rather than (at that time) the proposal to include land west of Honey Lane.

- The proposed development has sought to repair and restore the landscape character of both the valley slopes and floor (where development is located) and the upper slopes which form the Community Park as a comprehensive proposal:
- On the lower valley slopes by repairing the landscape pattern with open space between development parcels following the historic pattern (field boundaries, wooded links, woodland buffers etc.); and
- Enhancing the landscape of the proposed southern exposed slopes within the proposed Community Park, including replanting of woodland to reinforce the characteristic wooded horizons and to enhance habitat connectivity.

In addition, the treatment of the development along Funtley Road, rather than apologetically hiding development behind a hedgerow and providing a 'landscape buffer', has sought to positively enhance local distinctiveness. The concept has taken its cue from Meon Valley villages, where the juxtaposition of buildings, water channels and open space along village roads creates a strong sense of place and a special local character. This approach will help to create a 'village focus' and also help to bring together the communities either side of Funtley Road, as well as the wider village, into a more coherent 'village'. In contrast the densities fall away towards the southern edges with housing arranged as lower density farm clusters, as well as being a more fragmented form, reflecting and forming an appropriate 'rural edge' character.

The site should not be assessed as a designated ASLQ, until such time as the Local Plan has been through a thorough examination by an appointed Inspector. With substantial objections lodged regarding this matter, no weight can be attributed to the emerging Local Plan at this time.

Assessment of landscape effects

The landscape consultant has queried why, in the assessment of landscape effects in the LVA addendum, which the assessed effects on landscape character are slightly less adverse than those assessed for the 'smaller' scheme. The approach to the development layout is considered to be more beneficial to landscape character since it seeks to restore the landscape pattern and landscape features (hedgerows, woodland etc.), based on sound historical evidence rather than the rather arbitrary 'view' corridors of the previously consented scheme, infirmed and driven by the emerging local plan. These were only reluctantly accepted by the applicant who considers that revised layout to have greater veracity in achieving landscape repair. The revised scheme has also taken a bolder approach to achieving local distinctiveness. As such it is considered reasonable that LVA addendum has assessed the landscape benefits to be greater. The green links through the site are between 20 – 35m in width, providing significant areas of open space and landscaping between the housing parcels leading towards the new community park.

Proposed LEAP

On the subject of the LEAP, the landscape consultant has made the pre-supposition that the LEAP will be '*brightly coloured*'. This is not stated anywhere in the parameter plans or the DAS, which states (6.1) that 'homes will have...a well overlooked natural play area'. The intention is that the LEAP, which is placed at juxtaposition of development and the Community Park is an opportunity to introduce natural play in line with current environmental and child developmental thinking. The natural equipment would allow the development and practice of a number of skills such as balance, sensory perception and other skills in the context of the natural environment and close to the Ancient Woodland. Nonetheless, the revised parameters plan slightly repositions the LEAP to respond to these concerns.

Ancient Woodland

Following consultation response from Natural England and the County Ecologist, an Ancient Woodland Impact Assessment was prepared and formally submitted to the Council on 16th February 2021. A specific survey of the condition of all the woodlands present on-site and was undertaken in 2021, the aim of the survey was to assess the existing pressures on the woodlands on-site, and more specifically those relevant to the ancient woodland. This survey found that the very little, if any regular recreation takes place within the woodlands currently.

Furthermore, this assessment considers the potential for such pressures to arise as part of the proposed development and nearby development accessing the site. The accessibility of the woodlands was assessed with specific attention paid to any existing footpath / cycle track, potential access points, the topography of the site, hydrology and vegetation structure.

All potential pathways for significant effects to arise on the ancient woodland as a result of the proposal have been examined. Where necessary mitigation / avoidance measures, have been outlined.

The primary element of mitigation relates to the provision of a minimum 15m buffer between the development and the ancient woodland inventory boundary. It should be noted that Ecology Solutions consider that the true woodland boundary (as evidenced from the surveys undertaken) is set further back from the ancient woodland inventory boundary in the key location to the north west of the woodland. In fact, a buffer area of up to 37m is provided in some areas due to this mapping error. This is far in excess of what Natural England consider the minimum buffer required within their Standing Advice and far in excess of what is considered necessary given the potential impacts that have been assessed. It is considered that the detailed design of the proposed mitigation package could be subject to a suitably worded planning condition.

It is considered that (having adopted a precautionary stance to the assessment) the provision of the mitigation / avoidance measures described within this document would give added security to the conclusion that the proposed development would not give rise to harm to the features of acknowledged importance.

Natural England have reviewed the assessment, and confirmed by email (25th March 2021) that they welcome the proposals for transfer of the community park and woodland to FBC, the

proposals for woodland and scrub planting in order to improve connectivity between the SINC and other woodland and also the removal of the footpath through the Coppice.

They have confirmed that a Woodland Management and Monitoring Plan (either separate, or forming part of a wider community park management plan) is secured by a planning condition.

SUMMARY

As we detail in this response, we have concerns regarding the approach taken by the Council's Landscape Consultant, and the resulting inaccuracies in their submission to you. The lack of a site visit in our opinion is both concerning and unacceptable. Similarly, it is not possible to rely upon untested policies in an emerging plan which will be required to be subject to further significant changes in order to reflect the substantial increase in housing needs in the Borough. Both of these points have resulted in a skewed assessment, where the author is misinforming their assessment and therefore their conclusion.

We would respectfully request that this letter along with the amended plans are provided to the Landscape Consultant for re-consideration. We would also request that a site visit is undertaken. In the interim, we request that the current assessment is withdrawn until such time as a revised assessment has been undertaken.

If you have any additional questions, then please do not hesitate to contact me.

Yours sincerely

Tim Burden
Director

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