

[Response to Landscape Officer's Comments by Decimus Designs 09.01.23 \(in blue\)](#)

Eastleigh Borough Council, Landscape Officer's Comments:

I have downloaded and reviewed the following documents:

Appraisal Photographs
Arboricultural Impact Assessment
Combined Drainage Layout Plan
Landscape and Visual Impact Assessment
Landscape Strategy Plan
Planning Statement
Proposed Site Levels Plan
Proposed Elevations(Communal Facilities) Plan
Sectional Plan
Visual Appraisal Photographs
Visual Appraisal Plan

I have not had the opportunity to visit the site, but I have reviewed the setting of the proposal via on-line images. It is important for whoever is making comments on a planning application to visit the Site in question, particularly when making judgements on an LVIA. We assume the Officer has used Google Street View cameras, which are mounted on top of vehicles at approximately 2.4m above ground level, much higher than the view experienced by the average human eye (1.5m above ground). Therefore, it is not a true representation of a public view on roads and footpaths and does not correspond with established methodologies practised by the landscape profession in accordance with Guidelines for Landscape and Visual Impact Assessment 3rd Edition published by the Landscape Institute and Institute for Environmental Management & Assessment. It should also be noted that photographs included in the LVIA should be used as an 'aide memoire' and cannot capture or reflect the complexity of the true visual experience that an observer would receive in the field.

This is a sensitive site, and the main issue is the effect the proposal would have on the character and appearance of the area, with particular regard to its location within the strategic Gap. The LVIA does not consider it a "sensitive site" in landscape term. It does not lie within any statutory landscape designations, there are urbanising influences such as close proximity to two major A roads on western and southern boundaries, 0.5km west of Junction 7 on the M27 motorway, on the very edge of Strategic Gap next to the urban edge of Southampton, proposed golf club house/car park on northern boundary and large overflow car and bus park linked to Ageas Bowl currently under construction along the eastern boundary. To summarise, a small linear field, 1.5ha, surrounded on four sides by existing or proposed urban development which has planning consent.

There are some obvious close views into the site, especially from the elevated A334 Charles Watts Way. There may also be longer distant views, especially from the north and east, although none were included in the Landscape and Visual Impact Assessment (LVIA). The

study area included the local surroundings and a large area was covered. The LVIA explains at para 5.4 that views of the Site from the public realm are restricted to those in the immediate vicinity of the Site, from Moorhill Road and Charles Watts Way and these are all partial or glimpsed views and predominantly from those people travelling along the main A roads. At para 5.3 it explains that in this undulating landscape, topography played a key part in assessing the visual envelope and extensive built development and blocks of woodland further restrict views. From the top of the Site there is a narrow view of very distant hills to the east. Any potential views from these hills back to the Site would be dominated by built development and woodland on the ridgelines surrounding the Site. It is unlikely for the Site to be clearly depicted from such a long distance.

The site slopes significantly west to east and any proposed contouring requires careful review. The proposed levelling has been carefully considered to follow the contours of the site and minimize cut and fill.

Existing boundary vegetation plays an important role in softening the site. [Agreed, and it is proposed to retain, maintain and strengthen this boundary vegetation where applicable.](#)

In commenting on the scheme, I am mindful of Eastleigh Borough Councils declared Climate Emergency and the importance of maximising opportunities for tree planting. It is essential that the proposed landscape scheme for this site provides the development with robust, deliverable Green Infrastructure. [Agreed, Policy SP9 was taken into consideration as part of the design. This was achieved with the landscape strategy through native planting along the boundaries.](#)

Overall comment

My principal landscape objection is that this development is within designated Countryside and a settlement Gap as identified in the adopted Local Plan. Any development within these areas should be resisted as it is erosive and counter to Policy and will diminish the Gap by having an urbanising impact. [The LVIA at para 8.4 summarises that the small scale of the proposed holiday park, for use by touring caravans, motorhomes and tents is considered appropriate for its location and would not result in an unacceptable impact on the landscape character and visual amenity of the local area. As a temporal and acceptable countryside use, it would not urbanise or undermine the physical extent or visual separation of settlements, in compliance with Policy S6 \(Protection of Settlement Gaps\).](#)

The most significant Policies within the adopted Local Plan are Policy S5 which states that any development in the Countryside should avoid adversely impacting the character of the landscape. In addition, Policy S6 seeks to ensure the physical and visual separation between settlements is maintained. It is my view that the proposals are contrary to these Policies. [See comments above.](#)

My further detailed landscape comments follow below:

Planning Statement

a/ This document includes some helpful information with regard the previous Pre-App for this site for the construction of 40 Holiday Lodges or Park Homes. It is noted that Officers concluded (Section 3.22) that this proposal was contrary to Policy and that it would harm the area of Countryside and amount to a physical and visual diminishment of the Gap. *The Officers' conclusion was relating to the permanent siting of holiday lodges or park homes, not what is being proposed in this scheme which comprises touring caravans, motorhomes and tents of a transitory nature which are a visually common occurrence in the countryside.*

b/ Section 4 responds to this objection by suggesting that to address the Council's concerns static caravans are replaced by *'more sensitive use for pitches for the temporary siting of touring caravans, dormobiles and tents for holiday accommodation'*. Section 4.2 states *'there will be no permanent change to the general landscape which will remain open when not in use'*.

I disagree with both statements. Firstly, there can be no guarantee that the siting of caravans etc. will be temporary. Not only can some year-round occupancy be anticipated but the size and bulk of modern caravans and dormobiles may have visual impact not dissimilar to static lodges. *This assertion is simply untrue. The maximum size of touring caravans is restricted by UK law to up to 2.55 m width and up to 7m length (maximum sizes for towing on public highways) and they are much smaller than static caravans which are again restricted by law to up to 6.8m in width and 20m in length (Caravan Acts 1960 and 1968 as amended 2006) which is almost 9 times the maximum size of a touring caravan.* Additionally, the proposals will adversely impact the landscape character since an open grass field that plays an active role in retaining separation between the urban form will be lost. Further, the proposed site layout requires significant terracing across the site which will alter the landscape form. *The terracing has been sensitively designed as several small steps down the slope (approximately 1m change in level), avoiding the need for large engineered terraces. These level changes will be easily absorbed into the landscape and will be planted with native species which will give the visual appearance of hedges.*

c/ Section 6.10 suggest the scheme meets the environmental objectives required to achieve sustainable development as follows:

'Environmental: By maintaining open grassland, with gently graded terraces and by managing hedge and tree boundary screening, the proposals respect the character of the countryside and will maintain the openness of the site within the settlement gap.....'

I strongly disagree with this statement. The current open grassland will be lost with the construction of access tracks, the amenity building, bin stores, a pumping station and caravan pitches combining to have an urbanising effect. The terraces are not gently graded, rather they are steep banks geometrically spaced across the site. These proposals fail to respect the character of the countryside. *The terraces have been carefully and sensitively designed to follow the contours of the site and minimise the cut and fill necessary as explained above. The amenity building has been carefully designed and located to minimise the size of the building, any views of the building and therefore its impact on the landscape. The access tracks will be formed of bonded gravel, to give a rural appearance. Touring*

caravan sites are an acceptable and common feature of rural countryside areas, even including National Parks. They are not urbanising.

It is anticipated that significant external lighting will be needed for the safe use of the caravan park, and this will further reinforce the change in character of this site. Significant lighting is not necessary – many caravan and camping sites are sensitively integrated into the New Forest National Park, a designated landscape, without any significant external lighting, see for example Hollands Wood just north of Brockenhurst. No lighting is proposed with this application and any minimal lighting that may be required can be controlled by condition.

LVIA

a/ The quality of the assessment is generally acceptable, although the visual appraisal views do not include any potential mid or long distance views from the north and west. These should be checked (Section 6.9 Table A includes only 3 close viewpoints). As discussed above (refer to LVIA paras 5.3 and 5.4). Public views are restricted to near views.

b/ The summary of landscape character of the site fails to acknowledge that the grass field contributes to the open landscape character of the area. That is because the LVIA does not believe that it does so.

c/ Whilst accepting existing vegetation, topography and existing development reduces potential views into the site, the summary of visual appraisal focusses only on close visual receptors. Further work is required to confirm there are no wider landscape receptors. Usually views up to 1km from the centre of the site are included as a minimum. This has been covered in the LVIA see a/ above.

d/ Landscape impact assessment - Section 6.7 states '*The proposed development would bring about a change in character from an agricultural field to use for up to 33 touring pitches (caravans, motorhomes and tents)*'. The stated change in character is one of my fundamental objections. This open 'agricultural field' contributes to the visual and physical separation between settlements. The field does not contribute to the "visual separation" between settlements. It is completely isolated from any farm by the surrounding urban roads and uses and is too small to be viable for agricultural use alone. The combination of the proposed drives, communal facilities building, banking and internal geometric planting will fundamentally change the character of this piece of land. It will remain rural countryside in appearance and use.

e/ Section 9 Summary and Conclusions: Item 9.1 - any development associated with the adjacent Ageas Bowl does not provide a precedent for development on this site. However, it also cannot be ignored as the neighbouring development on the northern and eastern boundary will cause the Site to be enclosed by development on all sides, making it isolated from the Strategic Gap/countryside. Item 9.5 - I consider the proposed change in use would have a landscape effect greater than 'slightly adverse'. The proposals would significantly alter the landscape character of the site. The degree of landscape effect is a combination of magnitude of landscape effects (considered to be medium adverse) and sensitivity of landscape receptor (considered to be low) resulting in a slight adverse degree of landscape effect. (Item 9.6 - the degree of visual effects seems to be fair, although the impact on views in winter months will be significant as trees will not be in leaf and there is weak understorey growth, especially along Charles Watts Way. The degree of visual effect

was judged during a site visit in March with most deciduous vegetation not in leaf, giving maximum visibility across the surrounding landscape towards the Site and there would be little difference during winter. Glad that the Officer considers the degree of visual effects in the LVIA to be fair, but disagree that the impact will increase in the winter to become “significant”. The existing screen planting along Charles Watts Way is very thick and includes an element of evergreen planting.

f/ Summary Section 9.7 - I disagree that the holiday park is 'small scaled' since the development covers most of the area. The Site only covers 1.5ha and the touring caravans are low in height, low in density and temporary in nature. 33 pitches is a small number compared to most caravan sites. This is not a proposal for a large-scale high density housing development with 2/3 storey buildings. I also disagree that it would not result in unacceptable impact on the landscape and visual character of the local area. It is my judgement that the proposal is contrary to Policy S6. [We disagree, as above.](#)

Landscape Strategy Plan

a/ The principles shown on this plan are generally acceptable, although details of the surfacing and means of enclosure should be added. [Sufficient details of hard and soft landscape are provided on the Strategy Plan. Landscape details and any lighting can be agreed and controlled by conditions.](#) Any external lighting should also be indicated. A green roof to the communal building would be preferred. [This could be provided and secured in response to a ‘notwithstanding the roof details on the approved plan...’ materials to be agreed condition.](#)

b/ Some of the planting clashes with the drainage proposals - Pitches 28 - 30 - the planting here would not be deliverable as the drainage Engineers indicate a large soakaway here. [The illustrative masterplan indicates two hedges and two trees defining Plot 29 and this can be re-assessed at detailed design stage \(depending on the final detailed design of the drainage scheme\).](#) Please add the bulk water mains easement shown on the drainage plan to the landscape drawing and check for clashes with new trees. [The water main easement has already been taken into consideration and there is no clash with proposed trees \(refer to drawings below\).](#)

c/ Please add the location of the existing watercourse. [This can be seen on the plans prepared by NOLA Design \(2000.0016_100_P1, 2000.0016_101_P1, 2000.0016_102_P1, and 2000.0016_103_P1\) and previously submitted with the application.](#)

d/ Additional native tree and understorey planting is required to bolster the existing offsite vegetation all along the eastern boundary to Charles Watts Way. [This is provided for in the Landscape Strategy Plan within the site owned by the applicant. The land on the east side of the eastern boundary is owned by the highway authority and not under ownership of Applicant.](#)

e/ The adjacent, previously approved proposals on the land to the west (also under the applicant's ownership?) should be indicated so the present application is set in context. The 3 trees lost (note 2) - where will replacements occur? Ideally these should bolster the streetscene along Moorhill Road. [There is a comprehensive landscape scheme along Moorhill Road which will mitigate views and also replace any lost trees. The scheme has been granted planning permission and is on the planning portal \(within the ownership of the Applicant\). This scheme has already been taken into consideration as part of the design](#)

process. If required, we can provide a plan to incorporate proposals on the land to the west.

f/ Typically pumping stations are intrusive, particularly the fencing. Avoid steel palisade and ensure fencing is dark grey or black NOT green. This can form part of the landscape condition.

g/ Fully detailed planting plans should be conditioned. Agreed.

Combined Drainage Layout

a/ Check for clashes with planting - any planting must be deliverable. See comments above.

b/ Please check for any adverse impact on existing trees by the FW rising main adjacent the amenity block and the flow control chamber. I defer to the Tree officer on this.

c/ Will the route of the sewer connection to Moorhill Road adversely impact the planting on the adjacent site? The design of the landscape and drainage has been co-ordinated to avoid any potential clashes.

Sectional Plan

a/ These sections illustrate the extent of cut and fill proposed and the change from an evenly sloping piece of land to terraced effect. The field has already been graded in the past to achieve the flatter area in the centre. Terraced slopes can be an attractive feature in the landscape, including rural landscapes.

b/ Sections A1 and A2 show cut and fill within the boundary screening vegetation which is not acceptable as this will lead to loss of/damage to existing vegetation. Disagree – any grading has been kept within the boundary and away from existing tree RPAs.

c/ The terraced banks will make establishing new planting more challenging. Disagree – terraced planted banks area a common feature and achievable. Temporary surface protection may be required to avoid soil erosion. This can be achieved.

Communal facilities - proposed elevations

a/ This is a mundane building and further design detail is required. Please indicate roof finish, doors, height of brick plinth and further details on the type/colour of horizontal boarding. A green roof would be preferred. This is a plain building for the intended purpose and one which it is not intended should draw attention to itself. Detailed roofing and wall materials can be agreed by condition.

Visual Appraisal Photographs

a/ Viewpoint 1 - the removal of the existing Laurel hedge H1 will create more open views of the caravan park. It is anticipated that the proposed planting along the western boundary with the A27 will have been planted first and provide some screening whilst becoming established. In addition, the Site is set down lower in the landscape than the laurel hedge and views will not be “opened up” as such. Any impact will be temporary and mitigated by the new planting. Removal of the non-native laurel hedge and replacement with native planting is aimed at providing long term improvement to the landscape character and

biodiversity, was recommended by the Ecologist and accords with aims of Policy S9 Green Infrastructure.

b/ Viewpoint 2 - the removal of existing H1 would open up more significant views into the site and the degree of visual effect at Year 1 would be at least moderate. Ditto a/ above.

c/ Viewpoint 3 - the views all along the elevated Charles Watts Way are the most significant near views into the site. The degree of visual effects would be slight in summer but moderate in winter when the deciduous vegetation is not in leaf. Where possible the existing vegetation needs to be strengthened with new planting to bolster the screening effect. The sensitivity of visual receptors along the Charles Watts Way is low - main A road with no separate footway for pedestrians (a high sensitivity is reserved for recreational routes, public rights of way etc. which is not the case here). The magnitude of visual effects at Year 1 in winter was judged as minor in the LVIA. This was then combined to give a degree of visual effect at Year 1 as slight negative. It proposed to bolster the screen planting within the extent of the redline application site and ownership.

Visual Appraisal Plan

a/ The visual envelope only covers near views. Longer distance views may exist from the north and east. There is potential for very distant views to the east and this was discussed in the LVIA. They were dismissed as being too far away and it would be unlikely for the proposed development to be perceived from such distances.

Arboricultural Impact Assessment

a/ I could not locate the tree survey plan to be read with the survey schedule so I am unable to provide comments. The proposed layout and terracing were designed to avoid the tree RPAs as set out in the Tree Report.