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By e-mail

Dear Claire

Fareham Borough Local Plan 2036: Issues and Options

Thank you for consulting Gosport Borough Council (GBC) on the Issues and Options document for the Fareham Borough Local Plan 2036. I can advise you that the document was considered at the Council's Regulatory Board of 23rd July 2019.

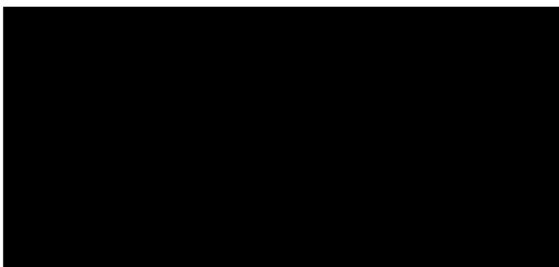
A summary of our representations, based on the Board's resolution, is set out below with more detailed comments attached (Appendix 1). These additional comments also form part of the Council's representations.

- Gosport Borough Council strongly opposes significant housing development in the current Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington as it does not represent 'good growth' and that it merits continued protection from any future development. The reasons for the objection, set out in Appendix 1, are summarised as follows:
 - There is an imperative requirement to safeguard effective strategic transport routes through the Strategic Gap to improve accessibility to, and from, the Gosport Peninsula to support the local economy. Further allocations will individually and cumulatively exacerbate accessibility constraints for reasons detailed in Appendix 1.
 - Further allocations will lead to the extensive erosion of the Strategic Gap, which is a long established planning principle in the South Hampshire area, as identified by the Partnership for South Hampshire's Spatial Position Statement that aims to prevent coalescence of settlements, maintain a sense of place and settlement identity, and provide a countryside setting for the sub region and local communities.

- More specifically this Council maintains its objection in full to the proposed residential allocation at Newgate Lane (referred to in the previous Draft Fareham Local Plan (DFLP) (2017) as HA2) for the reasons set out below:
 - The proposal would physically and visually diminish the long-established Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington;
 - The proposal would negate the benefits provided by the recent improvements to Newgate Lane with a negative impact on traffic flow and increased congestion to the detriment of Gosport residents and the local economy including accessibility to the Solent Enterprise Zone at Daedalus;
 - The proposal would significantly harm the amenities of local Gosport residents with the introduction of new access points to existing residential areas, which due to the scale of the proposal would lead to a significant increase of traffic on residential roads;
 - The proposal, as previously described in the DFLP is very car dependent with no provision for public transport. This would exacerbate the number of trips using Newgate Lane
 - There is insufficient information on supporting infrastructure required including education, medical and community facilities;
- Both Councils should proceed to publish the bilateral Statement of Common Ground as practicably as possible identifying major areas of agreement and non-agreement.
- Both Councils should consider producing an agreed strategy for the strategic gap as part of our Statement of Common Ground work which can be included in the respective Local Plans. This strategy should aim to provide multi-functional benefits to local communities as set out in detail within Appendix 1.
- FBC should consider opportunities to increase residential densities at the proposed Welborne development to reduce the need to develop in the Strategic Gap. It should also consider increasing densities in sustainable locations within Fareham Borough including within, and adjacent to, centres, and in close proximity to railway stations.

In the light of the above comments it will be important to maintain our ongoing dialogue as part of our bilateral Statement of Common Ground work as well as our continued involvement as part of the multilateral PUSH initiatives. In the meantime if you require any clarification on these matters please do not hesitate to contact me.

Yours sincerely



Appendix 1: Gosport Borough Council's detailed representations to the Fareham Local Plan: Issues and Options Consultation- July 2019

The detailed comments summarised in the attached letter are detailed below.

1.0 Land in the Fareham, Gosport, Lee-on-the-Solent, Stubbington Strategic Gap including the HA2 allocation

1.1 Firstly it is recognised that the standardised methodology introduced by the National Planning Policy Framework has increased the required number of dwellings that Fareham Borough Council need to consider over the Plan period to 2036 and hence the need to assess additional sites for residential allocations. However Gosport Borough Council strongly opposes new residential development in the Fareham-Gosport- Lee-on-the Solent and Stubbington (FGLS) Strategic Gap for a number of reasons set out below.

1.2 The Issues and Options document recognises that, *'previous planning policies have designated the whole area as a strategic gap in order to prevent Fareham and Stubbington from merging and help to define distinctive communities,'* and that, *'given the additional housing requirement, the Council is having to look again at the purpose of this existing strategic gap and its characteristics.'*

1.3 The Issues and Option Consultation also continues to identify the land between the Newgate Lane improvements and the Borough boundary at Bridgemary and Peel Common as a housing allocation (previously referred to as HA2).

1.4 As this site remains identified as an allocation and there has been no additional evidence to address any of the Council's substantial concerns it is proposed that the Council reiterates the comments made previously on this matter. Similarly as many of the Council's objections to HA2 are relevant to other potential allocations in the Fareham, Gosport, Lee-on-the-Solent and Stubbington (FGLS) Strategic Gap, it is proposed to set out our representations relating to HA2 and any potential additional allocations as a number of themes:

- Transport and Accessibility
- Air quality
- The principle of maintaining a Strategic Gap to prevent coalescence and protect the identity of settlements.
- Protecting the Strategic Gap to deliver multi-functional benefits for local communities
- Community and open space infrastructure

Transport and accessibility

- 1.5 **Why is a strategic transport corridor so important?** One of the Council's primary concerns is the impact of potential new development, including HA2 and any additional allocations, will have on the effectiveness of the strategic transport corridor through the existing Strategic Gap. It is considered that any allocations which have access directly onto the recently improved Newgate Lane and the proposed Stubbington Bypass will negate the benefits these proposals will deliver to improve access to, and from, the Peninsula.
- 1.6 These improvements are aimed at addressing existing acute transport infrastructure deficiencies, not to enable development on greenfield sites directly adjacent to the routes. Instead this improved infrastructure can bring regeneration benefits to difficult brownfield sites in Gosport and make them more attractive to investors. The NPPF is very clear that policies should promote the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained.
- 1.7 The issue of maintaining an effective transport corridor is imperative for Gosport's future prosperity. The Stubbington Bypass route is the only opportunity to improve vehicular access to the Borough. If the benefits of the Stubbington Bypass are negated by significant development being built with access directly onto the Bypass, this last opportunity would be lost and there would be a real sense that Gosport has been 'blocked in'.
- 1.8 This would perhaps be less significant if Gosport had its own railway station and had a reasonable job density rate with limited out-commuting. However this is certainly not the case.
- 1.9 Gosport has the lowest job density in the South East of England and one of the lowest in England at only 0.51 jobs per resident person of working age. Such a low job density has significant implications for the Borough including the considerable scale of daily out-commuting which puts tremendous pressure on the existing road system resulting in acute traffic congestion and high levels of air pollution as evidenced in the air quality management areas identified within Fareham Borough at the north end of the Peninsula. This congestion results in the road network reaching full capacity and an extended peak time spreading on key routes. This actual congestion as well as the wider perception of congestion that exists can act as a disincentive for business and employment investment. Gosport has limited transport options with no fixed rail link and hence the effectiveness of the small number of road routes from Gosport is even more important.
- 1.10 **Specific accessibility issues relating to HA2 and other allocations having direct access onto Newgate Lane East:** The Council would wish to maintain its objection to the HA2 proposal which included access directly onto Newgate Lane East. The Council's specific concerns regarding HA2 are also likely to be applicable to any further allocations in this area.
- 1.11 It is important to recognise that Newgate Lane East and other associated improvements were designed to achieve the following:

- improving access to the Peninsula including the Solent Enterprise Zone at Daedalus;
- increasing capacity and easing existing congestion on the route;
- creating fewer interruptions to traffic flow caused by turning traffic, or on-road cyclists;
- improving the alignment for safety reasons.

1.12 These objectives would be undermined by the proposed development at HA2 and other similar allocations. It was not intended that the strategic highways improvements would facilitate new housing development. Gosport Borough Council is very concerned that the HA2 proposed allocation and additional ones will have a detrimental impact on the existing significant congestion problems on the Gosport Peninsula and detract from recent and proposed improvements that aim to improve traffic flow to, and from, the Peninsula. This is critical for the future economic prosperity of the Borough including achieving the full potential of the Enterprise Zone.

1.13 The earlier Draft Fareham Local Plan (2017) (DFLP) was accompanied by an Interim Transport Assessment for the DFLP allocations (Oct 2017) which recognised that the current Volume over Capacity (v/c) exceed 100% in the PM peak on Newgate Lane and is approaching available practical capacity in the AM peak resulting in significant congestion. Consequently it is already recognised that traffic exceeds the available capacity on this strategic route. Table 1 summarises information from this document which highlighted that this situation is predicted to worsen over the period to 2036 and consequently the report recognised that Newgate Lane will experience *'more noticeable increases in traffic flow.'*

Table 1: Road capacity on Newgate Lane

	Volume over Capacity (v/c) on Newgate Lane		
	2015	2036 Baseline: Existing adopted local plan commitments (S Hants) with planned transport improvements*1	2036 Baseline plus DFLP allocations*2
AM	83%	98%	100%
PM	102%	106%	107%

*1 including Stubbington Bypass and Newgate Lane improvements

*2 this does not include any potential growth in Gosport Borough arising from the Gosport Borough Local Plan 2036

1.14 Additional allocations in the Strategic Gap would exacerbate the situation still further. It will also be necessary to take into account the additional allocations being put forward as part of the emerging work for the Gosport Borough Local Plan 2036.

1.15 The north-south movements along Newgate Lane should not be hindered by any new access arrangements for any proposed allocation, and consequently the Council objects to any proposals which will significantly hinder this flow. A new access off the proposed roundabout will introduce an interruption to traffic flow, particularly as it is envisaged to serve the whole development and that by its location and limited transport choice the

proposed allocation would be very car-dependent. Indeed the supporting FBC Sustainability Appraisal for the previous DFLP concedes that the *'majority of sites [in the DFLP] are sustainably located which will improve accessibility and encourage travel by sustainable modes, although the urban fringe sites at Funtley Road and Newgate Lane South are less sustainably located.'*

- 1.16 Due to the lack of detailed information available at the Issues and Options stage it is not known what the likely impacts will be on the links and junctions further north e.g. the northern section of Newgate Lane, the Longfield Avenue roundabout, the northern section of the A32 and the Quay Street roundabouts and beyond to the M27 Junction 11. Additionally, vehicles travelling south from the site will also reduce the capacity of the recently improved Peel Common Roundabout, which may also have significant implications for traffic queuing on Rowner Road.
- 1.17 **Potential impact on the effectiveness of the Stubbington Bypass:** Given that proposed allocations may well negate the benefits gained by the Newgate Lane road improvements it will also be necessary to consider whether the HA2 site together with other potential residential allocations could cumulatively have a detrimental impact on the function and objectives of the Stubbington Bypass. .
- 1.18 The DFLP recognised that this route forms part of Hampshire County Council's plan for improving access to Fareham and Gosport and seeks to ease congestion, improve safety and the area's economic prosperity by encouraging investment and regeneration, including at the Solent Enterprise Zone at Daedalus. The accompanying text in the DFLP acknowledged this will create a reliable route for traffic wishing to travel from the Gosport Peninsula westwards towards the M27 at Junction 9, in conjunction with recently completed works at St Margaret's Roundabout on the A27, and works underway to upgrade the A27 between the Titchfield Gyratory and Segensworth to two lanes in both directions. It is important to note that the DFLP stated in paragraph 11.46 that the Stubbington Bypass is **not** being provided with an intention of serving or facilitating additional new homes. GBC consider that FBC's position in the DFLP relating to the Stubbington Bypass is still valid and should be maintained.

Air quality

- 1.19 Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and therefore it would be necessary to include measures mentioned in Policy INF2 of the DFLP which promotes sustainable transport to mitigate this impact. This is likely to be very difficult for allocations in the Strategic Gap of this scale with limited public transport choice.

The principle of maintaining a Strategic Gap to prevent coalescence and protect the identity of settlements

- 1.20 The Strategic Gap is identified in the Gosport Borough Local Plan 2011-2029 (GBLP) (Policy LP3) and FBC's current Local Plan (Policy CS22 of the Core Strategy). GBC and FBC have worked collaboratively in the past to

define the boundaries of the Strategic Gap and have been successful in maintaining a functional gap and visual separation between the settlements.

- 1.21 In order to accommodate the HA2 residential allocation the DFLP proposed to amend the Strategic Gap and this would be the likely consequence of any further proposed allocations within this broad area.
- 1.22 The sub-regional PUSH Spatial Position Statement states that Councils should identify in their Local Plans strategic countryside gaps of sub-regional importance and that these gaps are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. It recognises that gaps can provide the space for necessary uses such as recreation areas, transport corridors and environmental mitigation.
- 1.23 FBC's current Policy CS22 states that '*development proposals will not be permitted either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of the settlements*'. The Policy recognises that maintaining separation will prevent coalescence of the settlements in this densely settled part of South Hampshire.
- 1.24 The justification text states that gaps between settlements help define and maintain the separate identity of individual settlements and have strong local support. It adds that Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. It acknowledges that continuing pressure for high levels of development mean that maintaining gaps continues to be justified.
- 1.25 The Issues and Options consultation appears to encourage a move from this position by suggesting that development in the Gap could be appropriate through 'careful planning'. This Council strongly opposes this change in approach and considers that the HA2 allocation and additional residential proposals will have a significant and detrimental impact on the current form and function of the Strategic Gap and no amount of 'careful planning' would be able to mitigate these impacts.
- 1.26 It is considered the text of Policy CS22 remains relevant in the specific case of the Newgate Lane area and much of the remainder of the strategic gap. Indeed the current boundary has been supported by a Planning Inspector as recently as May 2015. In his report into the Examination in Public for the Fareham Local Plan Part 2, the Inspector refers to FBC's evidence regarding the review of Strategic Gaps and states,

'although the review did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. Having visited the area I agree with the Council that the gap between Fareham and Stubbington is justified in order to retain visual separation and that the proposed road improvements would not justify a revision to the boundary. The Council's

approach is sound.'

- 1.27 The DFLP (2017) also included a policy relating to Strategic Gaps (Policy SP6) which continues to prevent the coalescence of urban areas and to maintain the separate identity of settlements. It also identified a Strategic Gap between *'Fareham/Bridgemary and Stubbington/Lee-on-the-Solent'*. It stated, *'development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements'*. The justification text acknowledged that, *'retaining the open farmland gap between Fareham and Stubbington is critical in preventing the physical coalescence of these two settlements together with maintaining the sense of separation'*. It also clearly stated in Paragraph 4.39 that, *'further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemary along with maintaining the separate identify of Peel Common.'* This Council agrees that this approach should be maintained.
- 1.28 Allocations in the Strategic Gap would also contradict FBC's own evidence which seeks to protect the strategic gap. By way of an example, the Fareham Landscape Assessment (2017) incorporates a review of the Strategic Gap designation including the 'Woodcot area' which includes the land covered by the proposed HA2 Newgate Lane allocation. It concludes, *'This is a cohesive area of undeveloped landscape which performs an important role in respect of the primary purposes of the Strategic Gap i.e. in defining the edges, separate identity and settings of Fareham and Gosport, preventing their coalescence. Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap. It is recommended that the Gap boundaries remain unchanged.'*
- 1.29 Gosport Borough Council agrees with these findings set out in the Fareham Landscape Assessment and considers that the Woodcot area and other parts of this area should remain an integral part of the Strategic Gap.
- 1.30 Whilst recognising that circumstances have changed in terms of the need to accommodate additional housing numbers it is considered that there is an even stronger imperative to protect these important strips of land between settlements in the form of the Strategic Gap which certainly continue to perform the long-established planning function that both Councils have worked together to protect.
- 1.31 It is also recognised that the local plan process is the appropriate time to review such designations; however it is considered that the proposed change at the HA2 allocation and other potential changes will affect the integrity of the remaining gap by significantly reducing its width. This and other proposed residential allocations by their sheer scale will undoubtedly harm the character of the gap and will diminish the physical and visual separation of the settlements.

Protecting the Strategic Gap to deliver multi-functional benefits for local communities

- 1.32 This Council proposes that we work together with FBC bilaterally and as

part of PUSH to find a long-term strategy for the strategic gaps which serve a number of existing functions and could be further diversified. These functions include:

- Strategic transport corridor for critical road infrastructure to, and from the Peninsula including the recent Newgate Lane improvements and proposed Stubbington Bypass.
- The Daedalus employment areas which have been designed to reflect the character of this part of the Gap
- Utilities including the Peel Common Waste Water Treatment Works
- Sustainable power - Solar farms and IFA2
- Recreational land to improve cycle and walking routes to facilitate countryside access between the communities and links with Titchfield and the Meon Valley.
- Land for environmental mitigation
 - Land required for nitrate mitigation
 - Land required to deflect recreational pressure from sensitive coastal habitats and/or create Brent Goose refuges to allow development to take place in more sustainable locations
 - Land required for biodiversity net gain
 - Land required for carbon storage
- Maintaining local food production

1.33 Therefore as part of this Issues and Options consultation this Council would request that FBC considers the option of establishing a multi-functional corridor which includes the various uses set out above. It is considered appropriate that the agreed joint long term strategy would include the whole strategic gap including areas within Gosport Borough to ensure that recreational and environmental benefits are taken together.

1.34 It is noted from the Issues and Options consultation that FBC are asking respondents whether there are any local areas of green space that the Council should protect. This relates to the NPPF's Local Green Space designation which states that this designation should only be used if it is:

- In reasonably close proximity to the community it serves;
- Demonstrably special to the local community and holds a particular significance for example because of its beauty, historic significance, recreational value (including as a playing field) tranquillity or richness in wildlife;
- Local in character and is not an extensive tract of land.

1.35 The NPPF adds that policies for managing development within a Local Green Space should be consistent with those for green belts. It is not clear

what is meant by 'extensive' as this is a relative term and when compared to tracts of open countryside, the Strategic Gap is local and not particularly extensive. FBC may wish to explore opportunities to allocate areas of the Gap as Local Green Space if it considers these meet the relevant criteria.

- 1.36 The Issues and Options consultation also states that it is proposed that the Meon Valley is included as part of the PUSH work to consider the potential for greenbelt land across the local authority area, as it recognises that there could be scope for this area to become part of a South Hampshire greenbelt. As part of any consideration of green belt it would also be necessary to consider the option of the FGLS Strategic Gap as well.
- 1.37 According to the NPPF greenbelts need to serve five purposes:
- To check the unrestricted sprawl of large built-up area
 - To prevent neighbouring towns merging into one another
 - To assist in safeguarding the countryside for encroachment
 - To preserve the setting and special character of historic towns;
 - To assist urban regeneration by encouraging the recycling of derelict land and other urban land.
- 1.38 In this instance a greenbelt in the FGLS Strategic Gap would prevent the Portsmouth-Fareham- Gosport conurbation merging with Lee-on-the Solent and Stubbington. The fifth reason outlined above is particularly applicable for Gosport's issues relating to brownfield sites.
- 1.39 It is important to recognise that there are substantial hurdles in establishing a new greenbelt and the NPPF states that these should only be established in 'exceptional circumstances' and that there are five very difficult criteria to meet. It is mentioned in this context as if the Meon Gap is being considered then it is reasonable that the FGLS Strategic Gap should be included as part of this process.
- 1.40 Overall it is considered that a joint Fareham/Gosport strategy for the Gap with PUSH support would be a significantly positive way forward which would deliver multi-functional benefits for local communities in both Boroughs. This could form part of our bilateral Statement of Common Ground and be included in the respective Local Plans.

Community and open space infrastructure

- 1.41 The Issues and Options consultation does not include detail on the facilities and services supporting potential allocations within each of the broad areas. Therefore it is considered necessary for the Council to maintain its earlier concerns raised as part of the DFLP consultation with regard to educational, community and open space facilities in relation to the HA2 allocation and acknowledge that depending on what is proposed at the next consultation Local Plan there may well be further concerns relating to these matters.

1.42 Issues raised previously included:

School provision- there is insufficient detail of how local school places could be affected by the proposals. It will be necessary to understand the impact of the new housing development on local schools as any development on the HA2 or other unidentified allocations are likely to include a high proportion of households with children.

Community facilities- It will also be important to understand whether any new development at Newgate Lane or other allocations can be sufficiently supported by other community facilities in the area including health facilities (such as GPs) and community hall provision and whether it is necessary to provide new community facilities as part of the development. Consequently without such information such proposals cannot be supported.

Open space- It will be necessary to ensure such provision meets the requirements of any new community without affecting that enjoyed by existing residents.

Conclusion to Fareham, Gosport, Lee-on-the-Solent, Stubbington section of the Issues and Options Consultation

1.43 In the light of the above and in answer to the question posed in the Issues and Options consultation it is considered that development in the strategic gap including the HA2 consultation does not represent good growth for the residents and businesses of the Gosport peninsula. The Council does not support future growth in the Strategic Gap and instead considers that it merits continued protection from any future development.

2.0 **Housing density at Welborne**

2.1 The Issues and Options Report focusses on eight broad areas for the potential for finding land for new houses. In addition to the '*Land between Fareham and Stubbington*', FBC may wish to consider further options at Welborne.

2.2 The document itself only includes '*Land around Welborne Garden Village*' and not Welborne itself. This broad area of search is the area of land to the east of the A32 north of Junction 10 and close to Junction 11. The document states that '*with the exception of land close to junction 11 being promoted for commercial use; the Council has not received details of any land being promoted in this area, all of which is in private ownership. Additionally this area is considered to be valued landscape with limited scope to accommodate large-scale development.*' In the light of the above statement there may be difficulties for additional development in this area.

2.3 However there may be opportunities to increase the residential quantum at Welborne itself by increasing densities. It is recognised that there may be constraints to reviewing these options at this stage, particularly given that there is a planning application for the site currently under consideration

2.4 However even marginal density increases in areas where the current

proposed densities are 'up to 30 dwelling per hectare' (dph) and 'up to 35 dph' could yield significant increases in the number of dwellings at this site.

2.5 By considering further options for a railway station at this site could also facilitate higher densities of development in proximity to any potential railway station site. Given the restricted supply of land in the South Hampshire sub-region building at exceptionally low densities would represent a missed opportunity as the PUSH authorities plan forward to 2036 and onto 2050.

2.6 It is clear from the NPPF that planning policies and decisions should support development that makes efficient use of land. It states that where there is an existing or anticipated shortage of land for meeting identified housing needs it is especially important that planning policies and decisions avoid homes being built at low densities and ensure the developments make optimal use of the potential for each site.

2.7 Such increases in densities would make public transport and other facilities more viable and would also reduce the need to develop in the FGLS Strategic Gap.

3.0 Other locations

3.1 FBC should also consider increasing densities in sustainable locations within Fareham Borough including within, and adjacent to centres, and in close proximity to railway stations. This would also ease pressure on the Strategic Gap.

END