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Dear Richard

Fareham Borough Local Plan 2036: Supplement

Thank you for consulting Gosport Borough Council (GBC) on the Supplement document for the Fareham Borough Local Plan 2036. I can advise that the document was considered at the Council's Regulatory Board of 26th February 2020.

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.

- That this Council's previous comments to the Draft Fareham Local Plan 2036 (DFLP 2017) and the subsequent Issues and Options document are fully considered with these latest representations.
- That this Council objects to the overall Development Strategy including the plan that identifies the South Newgate Lane allocation and the Strategic Growth Area as it does not represent 'good growth'.
- That this Council objects to the proposed policy on the Five Year Housing Supply as it presumes in favour of development outside of the settlement boundaries prior to other types of land within urban area boundaries and within more sustainable locations.
- That this Council maintains its strong 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 will 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 Borough and Stubbington residents and the local economy including accessibility to the Solent Enterprise Zone at Daedalus;
- The proposal will significantly harm the amenities of local Gosport residents by 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.
- That this Council objects that the HA2 allocation was not subject to a second consultation as part of this Supplement given the problems that arose with the initial consultation in 2017 on the Draft Fareham Local Plan relating to the access arrangements to the site, particularly in relation to Tukes Avenue.
- That this Council strongly objects to the designation of Strategic Growth Areas (SGAs) including the South of Fareham SGA within the current Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington for the following reasons:
 - The promotion of SGAs at this stage prejudices work being undertaken by local planning authorities at a multilateral level to ascertain the most appropriate sustainable broad locations for development over the period to 2036 and beyond to 2050, known as Strategic Development Opportunity Areas.
 - The South of Fareham SGA does not represent 'good growth' for the residents of Gosport, Lee-on-the-Solent, Stubbington, Hillhead and south Fareham and therefore is not considered to be sustainable development.
 - It is imperative 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 housing allocations will individually and cumulatively exacerbate accessibility constraints for reasons detailed in Appendix 1.
 - Further housing allocations will lead to the extensive erosion of the Strategic Gap, the protection of 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.
- That this Council expresses its concerns that Fareham Borough Council may not be fulfilling its duty to cooperate because it is not considering the outcome of the joint Partnership for South Hampshire work on Strategic Development Opportunity Areas as part of the sub-regional Statement of Common Ground

which will assess the most appropriate locations for development in the sub region.

 That Fareham Borough Council are urged to reconsider the proposals for HA2 and the SGA which are contrary to the objectives of the climate change and air quality policies.

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

