

FAREHAM LOCAL PLAN PART 2: THE DEVELOPMENT SITES AND POLICIES PLAN

Issue 2: The Existing Settlements (DSP2 – DSP6)

Actions arising from Hearing Session (December 2014)

RESPONSE TO COUNCIL'S COMMENTS (DCD-20)

Prepared by Barton Willmore on behalf of Hallam Land Management (HLM)

This statement is submitted to the Examination into the Fareham Local Plan Part 2: Development Sites and Policies (LP2) (June 2014) ('the Examination') on behalf of Hallam Land Management Ltd (HLM). This statement addresses the Council's response to actions identified by the Inspector during the hearing session for Issue 2: The Existing Settlements (contained within document DCD-20).

Specifically, this statement considers the Council's response to the following action items:

1. The suitability of the methodology in the Fareham Borough Gap Review (DNE05)

HLM has no comment to make in respect of items 2 (re-wording on Policy DSP5 regarding Ransom Strips) or 3 (reference to the Grace Dieu in Policy DSP54: New Moorings).

We consider item 1 below.

1. The suitability of the methodology in the Fareham Borough Gap Review.

We have reviewed the Council's response to this query and make the following comments.

It is important to note that one criterion for the primary function of 'Visual Separation' could lead to some discrepancies in resultant ranking: '*Sense of separation due to topography and density of vegetation as gap*' suggests that the more vegetation or interrupting landform there is, the greater the contribution to the function of the gap. We submit that the open nature of a gap, combined with strong settlement edge vegetation can also provide a very distinct sense of separation. This is loosely covered by the criteria in '*Prevention of Coalescence*', for '*Low density of existing buildings*' (referred to in Para 5.1 of the Review Report).

There is no apparent explanation within the published material as to how the Analysis Matrices translate into a Broad rating, and if the primary function criteria carry a greater weighting than the secondary function of recreation and green infrastructure provision.

Utilisation of the Landscape Character Areas as parcels for assessing to what extent land contributes to a Strategic Gap also appears generally appropriate, as it is the physical and visual characteristics of gaps between settlements which has an influence on how a gap functions and relates to the two primary functions of a gap which are defined as 'Prevention of Coalescence/Physical Separation' and 'Visual Separation'.

Crucially however, David Hare Landscape Architecture acknowledge that the Stubbington Bypass was **not** considered in the Strategic Gap Review, and their response is very brief, providing no additional analysis other than stating that "...we do not think these proposals would alter the boundary of the strategic gap in this part of the borough," but that "the new road improvements should not compromise this" [i.e. the separate identities of Fareham and Stubbington]. This response conflicts with the requirement of Strategic Gaps to include no more land than is necessary to perform their function.

The David Hare Landscape Architecture Strategic Gap Review places emphasis on '**no more land than necessary**' being an important consideration, and is based the definition of gaps in the PUSH Policy Framework for Gaps. This is reiterated on Page 5 and Page 9 of their note in Appendix 1, in response to the Inspector's Questions. **However**, no attempt

to consider this aspect has been made in the Strategic Gap Review, with regard to gap between Fareham and Stubbington.

There is a difficulty with determining a minimum gap in the absence of considering any specific applications or proposals, particularly in the case of the Fareham - Stubbington Gap, as much of it is within one character area of predominantly open arable land (called Fareham and Stubbington Gap Landscape Character Area LCA 7/Area 19 of the Strategic Gap Review), and similarity of character of the gap with differences being very subtle. This means that a narrower distance could be drawn in various ways and the gap still function against the criteria set out in the Strategic Gap Review. However, there is no discussion or commentary on this within the Strategic Gap Review, or an assessment of whether a narrower gaps could still perform a gap function, albeit dependant on how future development comes forward, which, considering the purpose of the review is to determine appropriate boundaries for Strategic Gaps, is a major omission/oversight and a significant flaw in the evidence base underpinning the emerging Plan.

With the potential likelihood of the Stubbington Bypass coming forward, there was a clear opportunity for the Council to consider the extent of land between Fareham and Stubbington necessary to maintain the separate identities of the two settlements. The proposed Stubbington Bypass would create a clear and robust physical delineation through the Fareham - Stubbington Gap, and if the remainder of the gap to the south-west, between the Stubbington Bypass and Stubbington was assessed in accordance with the methodology set out in the Strategic Gap Review, with the objective of including 'no more land than necessary' within the gap designation, this remaining land would continue to perform all the required functions.

In accordance with the criteria set out in the Strategic Gap Review, the remaining land to the south west would have the same or very similar overall score, and would still meet with the objectives of the gap function and policy. Furthermore, whilst there would be a reduction in the width of the Strategic Gap, as clearly recognised and accounted for within the Strategic Gap Review, the successful functioning of a gap is not just about distance, but the actually the character of the gap, how it is experienced, and most importantly whether settlements still appear and are experienced as separate and distinct, and this would remain the case between Fareham and Stubbington. HLM submit that there is a notable degree of additional work required in order for the Strategic Gap Review to constitute reliable and informed evidence in terms of gap policy: while the methodology itself is considered generally acceptable there are significant failings in terms of the manner in which the assessment has overlooked the introduction of the proposed Bypass and the implications this is likely to have on the character and extent of the existing Gap in the short to medium term.