

# **Fareham Local Plan 2037**

## **Matter 2 – Development Strategy (Strategic Policies DS1-3)**

**CPRE Hampshire**

**February 2022**



**Inspector’s Question 2 – Is the development strategy for the location and nature of developments in Fareham, justified as the most appropriate strategy for the sustainable development of the borough, when considered against the reasonable alternatives? What alternative strategies were considered by the Council in terms of the options for the spatial distribution of development and why were these rejected?**

1. It is not entirely clear which alternatives were considered, and at what time, especially in the light of the several different recent iterations of the plan. As each iteration was considering different housing numbers, it is not easy to compare apples with apples.

2. CPRE Hampshire reiterates its position that nothing less than a drastic change to previous spatial strategies and a move away from Fareham’s historic pattern of sprawling suburbs will enable any meaningful contribution to sustainability and the fight against adverse climate change. We owe it to future generations to do our utmost to shift patterns of behaviour that are currently entrenched with the use of the private car. Even electric cars will not solve many of these issues as they still leave residues from tyres and fluids and are unsustainable in terms of battery manufacture. The adoption of a South Hampshire Green Belt would assist this by encouraging urban redevelopment and preventing sprawl into the countryside where modal change to walking, cycling and public transport is very much more difficult to achieve. It would also maintain Fareham’s settlement pattern before it is further degraded.

**Policy DS1 – Development in the Countryside**

**Inspector’s Question 7 – Is the requirement for development to be on previously developed land in criteria b) too restrictive.**

3. No, it is not too restrictive and is in accordance with all recent statements from the Secretary of State.

**Inspector’s Question 9 – Criterion e) links to housing policies. Is there potential for conflict between these policies and unintended development in the countryside?**

4. Yes, we believe there is potential for these policies to be in conflict, as permission that is in accordance with HP4, HP5 and HP6 could be granted. The policy, or at least criterion e) is internally inconsistent. We have expanded on this argument in our response of 15<sup>th</sup> December 2020.

**Policy DS2 – Development in Strategic Gaps**

**Inspector’s Question 12 – Has the Technical Review of the Strategic Gaps followed a robust process? Are the boundaries identified appropriate and justified?**

5. CPRE Hampshire provided Fareham with a report dated January 2019 by West Waddy Consultants entitled “An Assessment of the Effectiveness of Settlement Gap Policies in South Hampshire in preventing Urban Sprawl & the Coalescence of Settlements”. It is not clear to us how Fareham BC’s Technical Review took any account of the information provided in this report.

6. The conclusion of the West Waddy report was that through appeals and

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permissions previous gaps designated in South Hampshire (including Fareham) have been significantly reduced over time, and are thus shown to have been an ineffective policy. We believe that a Green Belt would have sufficient weight to avoid this process continuing.

7. In the meantime, the fact that a significant allocation has been placed in what was the Strategic Gap between Fareham and Gosport, and this just seems to prove that gaps do not have any longevity.

**Policy DS3 – Landscape**

**Inspector’s Question 13 – is the identification of ASLQ justified, effective and consistent with national policy, in particular paragraph 174 of the Framework?**

8. Yes, the identification of ASLQs is justified, effective and consistent with national policy.

**Inspector’s Question 14 – Has the Technical Review of ASLQ followed a robust process? Are the boundaries identified appropriate and justified?**

9. Yes, the process was robust, and the boundaries are appropriate and justified.

**Inspector’s Question 15 – Is it clear to decision makers, developers and the local community what schemes are defined as major development proposals?**

10. No, is not clear to the local community.

**Inspector’s Question 16 – Should the supporting text clarify that a Landscape and Visual Impact Assessment would be required, not simply a Landscape Assessment?**

11. Yes.