

Hearing Statement of Fareham Society on Inspector's MIQ12 on Strategic Gaps.

For Hearing Day 1 Matter 2

The Fareham Society did not directly address Policy DS2 in its written statements. However, it raised concerns on the effect of housing allocation HA55 on the Fareham/Stubbington Strategic Gap. Although this allocation is shown as overlaying the Strategic Gap development of the site would in effect result in a redrawing of its boundary to accord with the line of the new development.

Given the above we wish to respond to MIQ12, giving some supporting details to points we raised on HA55.

There has been support for the Fareham/Stubbington Gap, and such gaps in general, in various studies over the years and in the previous Local Plan Inspector's report.

The **2012 Fareham Borough Gap** review says of Strategic Gaps that they "command wide public support and have been used with success in structure and local plans to maintain the separation of settlements in South Hampshire". The review carried out a notably detailed field study and analysis to assess "both the suitability of land for inclusion within a gap, and the broad level of functionality which the land provided in relation to the gap criteria". A reading of chapters 4 on Methodology, 5 on Physical and Visual Separation and 6 on Settlement Character and Visual Sensitivity will show just how rigorous an approach was used.

Chapter 8 of the review assessed, in light of the above, whether individual areas met the criteria for inclusion in Strategic Gaps having regard, amongst other things that in defining the extent of the Gaps "no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation".

The review concluded that, with but one exception not applicable in this case, that the "gap boundaries will continue to follow the edge of existing settlements".

This was supported by the **REPORT ON THE EXAMINATION INTO THE FAREHAM LOCAL PLAN PART 2: DEVELOPMENT SITES AND POLICIES.**

Given some concerns raised the Inspector sought further clarification on the regarding the delineation of the Strategic Gap boundaries and the methodology used in the Gap Review. Having reviewed the evidence, and having seen the site, he agreed with the Council that the gap between Fareham and Stubbington was justified in order to retain visual separation. He was of this view notwithstanding the route of the Stubbington by-pass, which he said would not justify a revision to the boundary.

The **2017 Landscape Assessment** followed a similarly rigorous and detailed approach to the 2012 study. It found the Fareham/Stubbington Strategic Gap to be an area of open, expansive landscape where susceptibility to change is high.

In terms of its value as a Strategic Gap it found that "While the area does not play a significant role in the topographic setting of the urban area, it is notable for a general lack of development and for providing both physical and visual separation between the settlements of Stubbington to the south and Fareham to the north, and between Stubbington and Gosport to the east. The significant role of the area in separating and preventing coalescence of these settlements is enshrined in policy, with the area designated a Strategic Gap in the Fareham Borough Local Plan."

It went on to say that "The edges to the urban areas at Fareham and Stubbington are clearly defined by strong boundary vegetation and there is a clear sense of coming out of one settlement and entering another, with a distinct rural character to the landscape of this area in between. This helps to reinforce the separate identity of each settlement...."

In conclusion it found that the Gap "plays an important role in defining the edges and separate identity of Fareham and Stubbington and a critical role in preventing their coalescence".

In 2020 the **Technical Review of Areas of Special Landscape Quality and Strategic Gaps** was undertaken and published. It concluded that the Fareham/Stubbington Strategic Gap is proposed for continued designation, has a strong sub-regional agreement for its designation, and a clear role in preventing settlement coalescence through continued and heavy pressure for the southern expansion of Fareham and northern and eastern expansion of Stubbington...". All of which we are in agreement with.

However, we are concerned about the statement that in an area to the south of Fareham, and west of HMS Collingwood some development could be visually absorbed into the Gap without compromising its function. On the limited information provided it is difficult to reconcile this with the findings of the two earlier reviews and the Local Plan Inspector's observations on the current adopted Plan.

That said we note the rather guarded language of the Review as it refers to "*possible*" adjustments to the Gap (my italics). It also contains some significant caveats to the redrawing of the Strategic Gap boundary, saying that "such adjustment would be driven by more detailed testing of development forms, scale, landscape and GI interventions. Such work would also need to consider the potential reduction of tranquility and dark night skies ratings in the area. Establishing a GI Framework or Strategy is recommended". There is no evidence in the emerging Local Plan of any of the detailed testing referred to above.

Given the above the Society is concerned about the robustness of the 2020 Review and considers that the Council has not justified what would in effect be a redrawing of the Strategic Gap boundary to accommodate the HA55 housing allocation.

