

Fareham Borough Council Hearing Statement

Matter 2 – Development Strategy

Prepared on behalf of

Metis Homes

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1.0 INTRODUCTION

- 1.1 Tetra Tech Planning have been instructed by Metis Homes to participate in the Examination of the Fareham Local Plan 2037.
- 1.2 Metis Homes have an opportunity to bring forward development at Land to the Rear of 35 Burridge Road, Burridge, as identified on the plan attached at **Appendix A**. Metis Homes have previously made representations in response to the Regulation 19 Fareham Revised Publication Local Plan 2037 consultation (July 2021).
- 1.3 This Hearing Statement sets out our client's position in relation to Matter 2 of the Examination which relates to Development Strategy. Metis Homes' interest in this matter emanates from their interests in promoting for development Land to the Rear of 35 Burridge Road.
- 1.4 Careful consideration has been given to the Inspector's Matters, Issues and Questions (INSP004) and the relevant published examination material available on Fareham Borough Council's (FBC) Examination webpage, all of which has informed the contents of this Statement.
- 1.5 This Statement will discuss the proposed development strategy, expanding on the points made during the Regulation 19 consultation. It will conclude that the settlement boundary review has not followed a robust process and has missed opportunities to unlock and maximise all available and suitable locations for development. It will also conclude that allocating sites within the Strategic Gap when there are other available more suitable sites for development is not justified.
- 1.6 This Statement should be read alongside the Regulation 19 representation, as well as the separate Hearing Statements submitted in relation to Matter 3 (Housing Need and Supply), Matter 4 (Housing Policies), Matter 5 (Gypsies, Travellers and Travelling Showpeople) and Matter 7 (Housing Land Supply).

2.0 SETTLEMENT BOUNDARIES

- 2.1 The Settlement Boundary Background Paper (September 2020) confirms that there are 9 settlement boundaries, all of which were subject to review as part of the emerging Local Plan preparation.
- 2.2 Within this, Burridge is not recognised as a settlement despite its considerably built-up nature which is comparable to, if not more built-up than other settlements with boundaries, including Hook and Chilling and Funtley, the former of which has no services or facilities whatsoever.
- 2.3 Burridge is a sustainable settlement which has access to a number of services and facilities, including a village hall, scout hut, dental practice, cricket and football clubs. There are also bus stops along Botley Road that provide transport services to Curbridge, Swanwick train station, Park Gate and Hedge End, as well as a bus service between Whiteley and Barton Peveril College for students. Swanwick benefits from a train station which provides access to regional and national services. Whiteley is a regional shopping destination with restaurants, shops, supermarkets, cinema, hotel, leisure facilities and is to the east of Burridge with easy walking and driving accessibility. This is expanded upon in the Accessibility Appraisal at **Appendix B**.
- 2.4 It should also be noted that Burridge was considered by an Inspector in a recent appeal at Rear of 77 Burridge Road, Burridge¹ to be: *“well related to shops, schools and health facilities. There are bus stops within 600m walk...it will be possible in the relatively near future to access primary schools and the local centres within a new urban extension which is presently under construction on the northern edge of Whiteley. This journey will be somewhere in the region of 1.5km by using Whiteley Lane.”*²
- 2.5 The Inspector goes on to state: *“The site is directly adjacent to the built-up area of Burridge and accessibility to services and facilities would not be significantly different to that of existing suburban estate facilities within Whiteley itself. Future occupiers of the development would not have to rely upon the private car, but any car journeys undertaken would be short.”*³
- 2.6 In addition, proposed allocation HA45 for three gypsy traveller pitches is located at Rear of 77 Burridge Road, Burridge. In the supporting text to this allocation in relation to finding suitable sites for such uses, the Plan clearly states: *“The ability to access local services and education and health facilities without long distance travel and factors such as the provision of pavements to serve the site will be vital to ensure safe pedestrian access can be achieved”*⁴

¹ Appeal Ref. APP/A1720/W/18/3209865

² Paragraph 24

³ Paragraph 25

⁴ Paragraph 5.93

2.7 This proposed allocation reinforces the fact that the Council itself views Burr ridge as a sustainable settlement.

2.8 The Settlement Boundary Background Paper (Ref. DS002) explains what a settlement boundary is in the context of the Fareham Local Plan 2037. It states:

“The reasons for establishing settlement boundaries include:

- *Directing development to more sustainable locations in terms of accessibility and proximity to public transport, and in terms of being well served by existing essential services and facilities.*
- *Protect the countryside from the encroachment of land uses more characteristic of urban areas, conserve heritage assets, the natural environment and landscape value...⁵”*

2.9 The table below sets out the services and facilities available in Burr ridge, compared with Hook and Chilling and Funtley, which clearly shows that Burr ridge has more services and facilities on offer yet is the only settlement of the three that does not currently have a boundary.

Burr ridge	Hook and Chilling	Funtley
Bus stops	N/A	Bus stops
Recreation ground		Recreation ground
Village hall		Social club
Scout hut		Public house
Dental practice		
Cricket club		
Football club		

2.10 Given the above, it is therefore considered that Burr ridge should be recognised as a settlement with a boundary. This would provide the opportunity to logically round off the urban area at the north-western corner of FBC’s administrative boundary.

⁵ Paragraph 3.3

- 2.11 The Plan states: *“the Borough would not be able to meet its identified housing and employment needs on previously developed (brownfield) land, and greenfield sites of lower agricultural quality, alone. For this reason, the allocation of residential development on BMV agricultural land in this Plan has been necessary to meet the identified housing and employment need. As such, it is vital the Council seeks to protect the remaining BMV agricultural land within the Borough⁶”.*
- 2.12 Strategic Priority 2 within the Plan states *“In the first instance maximise development within the urban area and away from the wider countryside, valued landscapes and spaces that contribute to settlement definition⁷”.*
- 2.13 Given the apparent limited availability of land, FBC should therefore be better utilising settlement boundary reviews to unlock and maximise all available and suitable locations for development as possible to ensure that the wider countryside is protected whilst making efficient use of land in built-up areas to promote sustainable development. Any settlement close to Whiteley must be considered to be highly sustainable and therefore any settlement boundary needs to include any possible site that could be developed subject to meeting the usual development management technical requirements. The approach currently being promoted in the Plan fails the test of ‘soundness’ due to not being **Justified** or **Consistent with national policy** to protect the best and most versatile agricultural land when there are other alternatives available.

Strategic Policy DS1: Development in the Countryside

- 2.14 As Burrige is not currently included within the settlement boundary, in planning policy terms it is therefore deemed as countryside, as per strategic policy DS1. However, countryside policies should not apply to a settlement like Burrige. It does not have the characteristics of countryside and this is confirmed by the Inspector in the above summarised appeal, whereby he states that Burrige is a built-up area and accessibility to services and facilities would not be significantly different to that of existing suburban estate facilities.
- 2.15 This is also confirmed in the FBC’s own Settlement Boundary Background Paper (Ref. DS002) which describes what a settlement boundary is, which to a reasonable observer clearly applies to Burrige.

⁶ Paragraph 3.35

⁷ Paragraph 2.12

3.0 DEVELOPMENT IN STRATEGIC GAPS

- 3.1 Two proposed sites - HA54 (Land East of Crofton Cemetery and West of Peak Lane) and HA55 (Land South of Longfield Avenue) are proposed housing allocations in the Plan, which are within the Strategic Gap.
- 3.2 Policy DS2 relates to development in Strategic Gaps and states that *“development proposals will not be permitted where they significantly affect the integrity of the gap and the physical and visual separation of settlements or the distinct nature of settlement characters”*.
- 3.3 Supporting text to the policy explains that the reason for Strategic Gaps is to prevent coalescence of settlements and help maintain distinct community identity. The Plan also states 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 separation⁸”*.
- 3.4 Following on from section 2.0 of this Statement and given the apparent limited availability of land, this reinforces the notion that FBC should be better utilising settlement boundary reviews to unlock and maximise all available and suitable locations for development as possible to ensure that Strategic Gaps and the wider countryside are not compromised.
- 3.5 Allocating sites within the Strategic Gap appears to be a contradictory approach to the purpose and designation of a Gap. If the proposed retention of the Gap is justified, then before proposing new development within the Gap, available and more suitable sites within the Borough, including in and around the built-up areas, such as land in Burridge, should be considered for development to avoid eroding, from the outset, the purported purposes of the Gap. We do not believe the Council have provided sufficient evidence that evidences that their strategy and approach is justified and therefore is inconsistent with national policy that seeks to protect areas of higher landscape value.
- 3.6 Whilst it is acknowledged that the HA54 site has recently been allowed at appeal⁹, the Inspector took heavily into account FBC’s 5-year housing land supply (5YHLS) shortfall, with the social benefits of the provision of 206 new houses identified as carrying significant weight in the overall planning balance and outweighing the identified harm to the character and appearance of the countryside. Nonetheless, for FBC to actively Plan for development in a Strategic Gap through the Plan is considered illogical when there is the opportunity to provide the much-needed housing on sites that are wholly outside the Strategic Gap and less sensitive.

⁸ Paragraph 3.46

⁹ Ref. APP/A1720/W/21/3275237

4.0 SUMMARY

- 4.1 Question 2 of the Inspector's MIQ's states: *"Is the development strategy for the location and nature of development in Fareham justified as the most appropriate strategy for the sustainable development of the borough when considered against the reasonable alternatives?"*. This Statement has demonstrated that the answer to this is no, the development strategy is not justified as the most appropriate strategy given the reasonable alternatives.
- 4.2 A settlement boundary review has been undertaken but FBC has failed to properly take into account its own description of what a settlement boundary is within the Settlement Boundary Background Paper. There are clear opportunities to extend and increase the number of settlement boundaries in the Borough to maximise all available, suitable sites in and around the built-up areas. This will avoid having to consider for development within the Strategic Gap or wider countryside and promote a more sustainable development strategy.
- 4.3 In addition, two proposed allocation sites - HA54 (Land East of Crofton Cemetery and West of Peak Lane) and HA55 (Land South of Longfield Avenue) are within the proposed Strategic Gap. Allocating sites within the Strategic Gap appears to be a contradictory approach to the purpose and designation of a Gap when there are other alternatives.
- 4.4 If the proposed Gap is justified, then before proposing new development within the Gap, available and more suitable sites within the Borough, including in and around the built-up areas, such as land in Burridge, should be considered for development to avoid eroding, from the outset, the purported purposes of the Gap. Given the highly sustainable nature of Burridge so close to Whiteley and all of the facilities that it offers, this location should be carefully considered and the boundary drawn widely to allow for further sustainable growth.

APPENDICES (Attached Separately)

Appendix A – site location plan

Appendix B – accessibility appraisal