

Fareham Borough Council Local Plan
Examination in Public
Hearing Statement
Matter 2 – Development Strategy

Prepared on behalf of
Vistry Group PLC
February 2022

Document control

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1.0 INTRODUCTION

- 1.1 Tetra Tech Planning have been instructed by Vistry Group PLC (hereafter 'Vistry Group') to participate in the Examination of the Fareham Local Plan 2037.
- 1.2 Vistry Group have an opportunity to bring forward development at Land at Pinks Hill, Wallington, as identified on the plan attached at Appendix 1. We have previously made representations in response to the Regulation 19 Fareham Revised Publication Local Plan 2037 consultation (July 2021) in addition to representations made earlier on in the preparation of the Fareham Local Plan.
- 1.3 This Hearing Statement sets out our client's position in relation to Matter 2 of the Examination which relates to Development Strategy.
- 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 expand on the points made during the Regulation 19 consultation and will discuss the proposed development strategy. It will conclude that allocating sites within the Strategic Gap when there are other available alternative and more suitable sites for development is not justified. It will also conclude that the settlement boundary review has not followed a robust process and has missed sustainable opportunities to maximise land adjoining the existing urban area.
- 1.6 This Statement should be read alongside our Regulation 19 representation, as well as the separate Hearing Statements submitted in relation to Matter 3 (Housing Need and Supply) and Matter 7 (Housing Land Supply).

2.0 DEVELOPMENT IN STRATEGIC GAPS

- 2.1 In terms of new housing allocations in the plan, two proposed sites - HA54 (Land East of Crofton Cemetery and West of Peak Lane) and HA55 (Land South of Longfield Avenue) account for 1,430 (or approximately 15% of the Plans housing requirement) within the proposed Strategic Gap. 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”*.
- 2.2 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 separation”*¹.
- 2.3 Whilst it is acknowledged that the HA54 site has recently been allowed at appeal², 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 before discounting all reasonable alternatives is considered illogical and unjustified when there is the opportunity to provide the much-needed housing on alternative sites that are less sensitive.
- 2.4 Allocating sites within the Strategic Gap therefore appears to be a contradictory approach to the purpose and designation of a Gap. If the proposed Gap is justified, then before proposing new development within the Gap, alternative available and more suitable sites within the Borough, such as the land at Pinks Hill, should be allocated for development to avoid eroding, from the outset, the purported purposes of the Gap.
- 2.5 The Council’s second strategic priority 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 definition.”* The development strategy to allocate 15% of the Plans housing requirement within valued landscape when other alternatives are available appears contrary to the vision and strategic priorities set out in the plan.
- 2.6 We do not believe that the Council have provided sufficient evidence that explains their strategy and approach is justified and therefore is inconsistent with national policy that seeks to protect areas of higher landscape value. We also consider that the Council has failed to justify why reasonable

¹ Paragraph 3.46

² Ref. APP/A1720/W/21/3275237

alternatives to the spatial distribution of development have been rejected prior to pursuing the development strategy set out in the Plan.

3.0 SETTLEMENT BOUNDARIES

3.1 Settlement boundaries were reviewed to support the emerging plan. The Settlement Boundary Background Paper (September 2020) sets out the methodology chosen to amend the boundaries. It states:

“The following factors were considered in the assessment of each Urban Area Boundary to assist with the suitability of the amendment proposed:

a) *Permanence – Where practical and appropriate the boundary of the urban area will follow a feature that is more likely to remain static over time, **such as an adopted road, that will act as a robust boundary.** Boundary features such as hedges can be removed and are likely to be less permanent and prone to change over time.*

b) *Long-established close-knit **development adjacent to the existing settlement policy boundary**³...”*

3.2 There appears to be space and scope to extend the settlement boundary of Fareham. The site at Pinks Hill complies with the above assessment in that it is bounded by the A27 to the south and east, which acts as a robust boundary that will remain static. It is also adjacent to the existing settlement boundary to the north and west and is physically, visually and functionally well-related to this urban area. It is also sustainable in terms of its location to the existing built-up area and its proximity to Fareham town centre. We believe the Council have not followed their own methodology when reviewing settlement boundaries.

3.3 The inclusion of the site at Pinks Hill would represent a logical rounding off opportunity to the settlement.

3.4 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 Borough⁴”.*

³ Paragraph 4.4

⁴ Paragraph 3.35

- 3.5 As set out in section 2 above, 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 definition⁵”*.
- 3.6 Given the apparent limited available land, FBC should therefore be better utilising settlement boundary reviews to unlock and maximise all available and suitable alternative sites for development as possible. This would ensure that the wider countryside is protected whilst making efficient use of land adjacent to urban areas to promote sustainable development. The approach being promoted in the plan is contrary to national policy to protect the best and most versatile agricultural land and the most valued landscape when there are other reasonable and sustainable alternatives available.

Strategic Policy DS1: Development in the Countryside

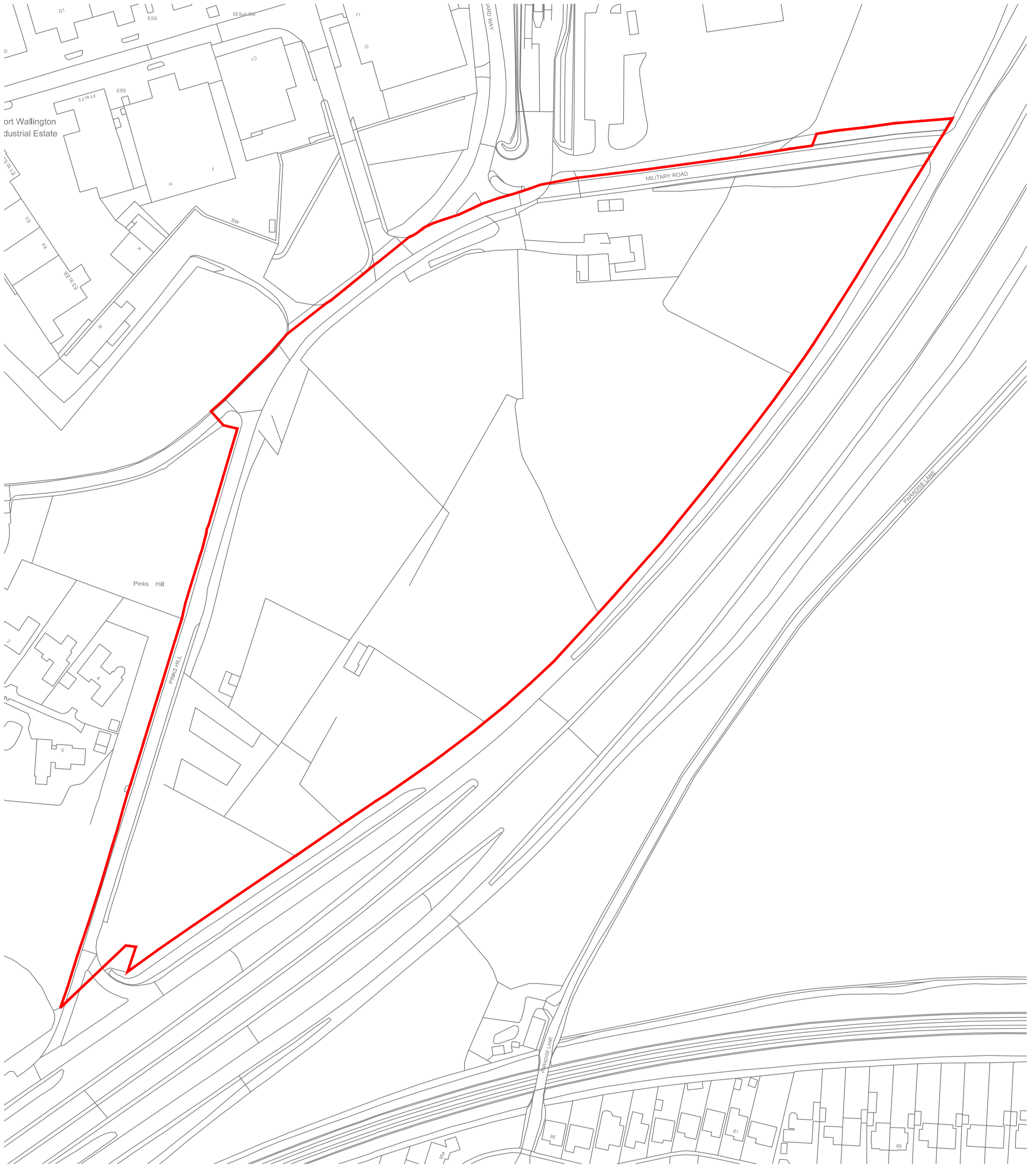
- 3.7 In terms of Strategic Policy DS1: Development in the Countryside, if the site at Pinks Hill is not included within the settlement boundary, then in planning policy terms it is in the countryside. However, countryside policies should not apply to a site like that of Pinks Hill as it does not have the characteristics of countryside – it adjoins the A27 and is in the immediate vicinity of the M27, an industrial estate and a significant residential neighbourhood. Such characteristics are tantamount to built-up, urban areas.

⁵ Paragraph 2.12

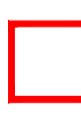
4.0 SUMMARY


- 4.1 In response to question 2: *“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 shown that the answer is no, the development strategy is not justified as the most appropriate strategy given the available alternatives.
- 4.2 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.
- 4.3 If the proposed Gap is justified, then before proposing new development within the Gap, available and more suitable sites within the Borough, such as the land at Pinks Hill, should be allocated for development before considering whether it is necessary to erode, from the outset, the purported purposes of the Gap.
- 4.4 A settlement boundary review has been undertaken but FBC has failed to properly take into account its own factors that underpinned the methodology to amending the boundaries.
- 4.5 There appears to be scope to extend the settlement boundary of Fareham, such as to include the site at Pinks Hill, in order to maximise all available, suitable sites close to the urban area. This will avoid having to consider further development on less sustainable sites such as within the Strategic Gap or wider countryside and promote a development strategy that is sequentially more sustainable.


APPENDIX 1 – PINKS HILL SITE LOCATION PLAN



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 Application Boundary
15.438ac / 6.247ha

Scale @ A2:

 Scale 1:1250

 NORTH

Rev	Date	Drawn	Checked

Project:
LAND AT PINKS HILL.
FAREHAM

APPLICATION
BOUNDARY

Client:
Vistry Group

Date: FEBRUARY 2022
 Drawn by: MC Checked by: BB
 Drg No: CB_78_214_PARAM_001 Rev:



COOPERBAILLIE