

Statement for Fareham Local Plan Examination March 2022 – Tim Haynes

I write to record my disappointment at the inclusion in the Fareham Borough Council Local Plan 2037 of a development allocation – HA55 – that I believe is contrary to the recommendations contained in the Technical Review of Areas of Special Landscape Quality and the Strategic Gaps September 2020. While it may follow the literal content of that review, I believe that the various iterations of the plan and contortions undergone by Fareham Borough Council to arrive at its “final” version have led planners and the author of the plan to use the Technical Review recommendations to be used by default as a way to resolve a persistent issue with its 5-year-housing-supply. While they can take recommendations and do with them what they will, I feel that HA55 goes beyond what the Technical Review author, admittedly ambiguously, concluded.

## **Settlement Boundaries**

### **3. What is the justification for defining settlement boundaries?**

Paragraph 3.10 of the Published Plan includes this:

“The need to respect settlement boundaries and protect the identity of our key settlements has been a strong influence on planning decisions to date. Two strategic gaps have long been established in the Borough; one in the Meon valley and the other between the settlements of Fareham and Stubbington. Strategic gaps have been retained but they have been re-defined in the Publication Plan to focus on preventing settlement coalescence. For this reason, it was necessary to undertake a careful review to ensure that the strategic gap performs the function of supporting the retention of settlement identity.”

There is then a reference to the ‘Technical Review of Areas of Special Landscape Quality and the Strategic Gaps’, a review conducted by Hampshire County Council for Fareham Borough Council.

This looks at the various areas of all currently defined Strategic gaps, including that between Fareham and Stubbington.

And in the Habitat Regulation Assessment for the Fareham Local Plan 2037: Screening & Appropriate Assessment Report for the Publication Plan November 2020, P74, there is a map (Figure 5.1) that clearly shows the Defined Urban Settlement Boundaries as part of the display of “Proposed allocations (east)”. It also includes in red site 3153, also known as HA55 but does not refer to this as a change to the settlement boundary, despite it being just this.

The most recent iteration of the Draft Plan, including HA55 for the first time, arose after Fareham Borough Council took it upon itself to recalculate housing demand in anticipation of a then MHCLG change from using 2014 ONS population projections to those from 2018. In the event, the council having predicated an updated draft on this eventuality, the government decided to stick with the 2014 figures.

In the Fareham Today supplement for “Summer 2021”, the author writes “Given the higher housing requirement we now have to meet, we are proposing some development within the Fareham / Stubbington strategic gap where we feel development can be accommodated without compromising the important role this strategic gap plays.

This paragraph follows a few pages after a time-line which clearly shows that rather than it being the perfidious government’s fault that there is a “higher housing requirement” (the 2021 figure is only

21 higher than that for 2020) it was Fareham Borough Council's guess at government policy and over-reliance on Welborne as a way to avoid looking for more brownfield sites that left them pouncing on the Fareham / Stubbington Gap as a way to ease the 5YHS problem.

Clearly, the authors of the plan have relied on the findings in the Technical Review of Areas of Special Landscape Quality and Strategic Gaps 22/09/2020; something they felt no need to do until they needed to find the extra houses; there is no mention of what follows as part of the justification for the proposed Strategic Growth Areas in the draft plan for 2020.

They are also playing fast and loose with the expectations raised in the various editions of Fareham Today.

The author of the Technical Review notes that of the various sections of the Fareham Stubbington strategic Gap; section 7a **Area East of Titchfield Road and West of Peak Lane (Strategic Gap Study Area 7a):**

***"6. Due to the significant number of viewpoints from long stretches of the key roads that run through the area: Titchfield Road and Peak Lane (and from the Stubbington Bypass, when it is completed) and from the numerous footpaths that run through the middle of this area, it is strongly recommended that the vast majority of this section of Strategic Gap remains intact. (Emphasis added.)*** It provides a useful informal recreational resource, within a distinctive landscape character, that is of good quality, where residents can walk in relative tranquility away from roads and enjoy long and varied views. Due to its moderate to large gap dimensions (800-1.2km) it has been able to retain a relatively high level of tranquility and dark nights skies, compared to other parts of Fareham and it would be a significant loss to local residents if they were not able to continue to enjoy this informal recreational resource.

7. For this section of the Gap, this analysis agrees with the summary findings of LDA in Chapter 3 of the Fareham Borough Landscape Character Assessment 2017 -*"The landscape performs a highly effective role in providing a 'sense' of separation and the experience of moving between one settlement and the other. .... Edges of Fareham and Stubbington are clearly defined by strong boundary vegetation and there is a clear distinction between 'town and country' there is a strong sense of leaving one urban area and moving through open countryside before entering another. Scale of the gap allows the time to appreciate sense of being in open countryside. Being able to see far across the gap and identify the edges, also strengthens the sense of separation."* (page 41) . P97"

However, the author has this to say about the section of gap across Peak Lane:

**"Area East of Peak Lane and West of HMS Collingwood (Strategic Gap Study Area 7b):**

9. Whilst this area comes under the same Landscape Character Area as Strategic Gap Study Area 7a, the terrain is much flatter, and the blocks of vegetation are less varied. Vegetation around the main large field screens the field from view from many vantage points. There are much fewer opportunities to see across this land, unless close to the field gates. ... ***Subject to detailed design, scale and functions, it is considered possible for the main field to absorb some development without a significant impact on visual quality of the Strategic Gap. If managed appropriately, development could have beneficial effect on the GI network (recreational and environmental) that exists around the periphery of the field***

***subject to appropriate attention being paid to GI provision and design. (Emphasis added)***

Therefore a change in Strategic Gap boundary could potentially be accommodated without undermining the principal purpose of the gap to prevent coalescence of settlements.

*However, 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 tranquillity and dark night skies ratings in the area. Establishing a GI Framework or Strategy is recommended."*

The author then goes on to include in the recommendations, and thence the Executive summary, the following:

"The Fareham-Stubbington Strategic Gap is proposed for continued designation, also having strong sub-regional agreement for its designation, and a clear role in preventing settlement coalescence through continued and heavy pressure for Southern expansion of Fareham and Northern and Eastern expansion of Stubbington, but it is considered that there are *some opportunities for development* to be accommodated within the landscape, without compromising the Strategic Gaps function."

I would contend that, while the planning department of Fareham Borough Council and the authors of the Local Plan, may have adhered to the letter of the Technical Review, they are taking the findings to their limit in making the allocation they have as HA55.

Unfortunately, both Fareham Borough Council and Hallam Homes, via their planners, "Urban Wilderness", seem to be taking the loosest interpretation of this summary. The Hallam Homes Illustrative Masterplan AAP-006-A Fareham - 19 Jun 20 may not strictly be relevant to this hearing but, as drafted, would seem to do more than plan for "*some opportunities for development*". The design, as with the indicative plan for HA55 in the Plan, more or less occupies all the area between the north-west corner of HMS Collingwood, the north edge of the Stubbington Bypass and Peak Lane. Moreover, the Illustrative Masterplan includes a significant development in the area to the west of Peak Lane, adjacent to the Ancient Woodland at Oxleys Coppice; a 3.6 Ha sports area including 3 pitches, a pavilion along with around 30 houses; not to mention a new roundabout on Peak Lane.

The plan does include some "Green Infrastructure" as envisaged in the HA55 allocation, but since this includes "Structural Woodland Planting" and "Habitat Creation" it is clear Hallam Homes' planners view this Green Infrastructure as principally to serve the needs of the new residents.

As seems to be the norm, biodiversity gets only a minor look in. True, there are, in the Strategic Assessment and the HRA a lengthy set of appraisals of a selection of birds and other fauna, but beyond referring to the area covered by HA55 as a low-level Brent Goose / Wader site, the plan itself has nothing to say on the remaining wildlife known to be present in what is currently open arable land.

The RSPB has commented on the application of Policy NE5 in the overall plan as part of the consultation in a letter dated 28<sup>th</sup> February 2020; I include a full quote relating to the area that includes HA55 as I believe it indicates their concern at the proposals:

"Land between Fareham and Stubbington

Land between Fareham and Stubbington has been identified as a Strategic Growth Area. This area contains the largest proportion of sites assessed as developable within the SHELAA. We highlight those sites below:

- Land South of Longfield Avenue, Fareham (SHELAA site 3008) – identified as containing both SWBGS Secondary Support and Low Use sites.
- Land South of Oakcroft Lane, Stubbington (SHELAA site 1341) – identified as containing both SWBGS Secondary Support and Low Use sites.
- Land East of Titchfield Road, Titchfield (SHELAA site 3059) – identified as containing SWBGS Low Use site.
- Land at Titchfield Road and Ranvilles Lane (SHELAA site 3190) – identified as containing SWBGS Low Use site.
- Newlands Plus – Area B1 and B2 (SHELAA sites 3199 and 3200) – both are identified as containing SWBGS Low Use sites.

***‘Considering the annual housing need for Fareham Borough at 520 houses per year, with a total requirement for 8,320 new houses developed over the duration of the Local Plan (not including the 10-15% buffer proposed for the new Local Plan), the RSPB is concerned by the proposed loss of sites between Fareham and Stubbington and the impact that these developments in-combination will have on the wider SWBGS network of sites and its connectivity. The land between Fareham and Stubbington provides one of the last stepping-stones between SWBGS sites from Portsmouth Harbour SPA to the east of the Borough and Southampton Water SPA to the west. Therefore, the assessment of this in-combination effort of the loss of these sites identified in the SHELAA needs to be considered within Fareham Borough Council Local Plan. Further, any development identified within 5.6km of the Solent SPAs will need to contribute towards the Solent Recreation Mitigation Strategy (SRMP). Development located immediately adjacent is likely to require more than financial contribution to the strategy in order to fully mitigate likely significant impacts upon the SPAs.’ (Emphasis added).***

#### **4. Has the approach to reviewing and defining boundaries followed a robust process?**

The policies relevant to the Strategic Gap in are DS1 and DS2.

*DS1 - Development in the Countryside includes the following:*

- *Proposals for development in the countryside, which is defined as land outside the Urban Area boundary as shown on the Policies map, will be supported where the proposal:*
  - *e) Is for housing development compliant with one of the following policies; HP1, HP2, HP4, HP5, HP6 or HP11,*

Policies HP 1 and HP2 do not apply as they are connected to small developments. Policy HP4, however says this: Policy HP4: Five-Year Housing Land Supply

*If the Council cannot demonstrate a five-year supply of land for housing against the housing requirement set out in Policy H1, additional housing sites, outside the Urban Area boundary will be permitted where they meet all of the following criteria:*

- a) The proposal is relative in scale to the five-year housing land supply shortfall;*
- b) The proposal is sustainably located adjacent to, and well related to, the existing urban area boundaries, and can be integrated with the neighbouring settlement;*
- c) The proposal is sensitively designed to reflect the landscape character and setting of the settlement, is of a scale proportionate to its setting and recognises the intrinsic character*

*and beauty of the countryside and, if relevant, does not significantly affect the integrity of a Strategic Gap;*

*d) It can be demonstrated that the proposal is deliverable in the short term; and*

*e) The proposal would not have any unacceptable environmental, amenity or traffic implications.*

**In this instance – the lack of a 5- year Housing Supply, HP4 would appear to be relevant.**

How about DS2? Are the ... (Strategic Gap) ... boundaries identified appropriate and justified?

In order to prevent the coalescence of urban areas and to maintain the separate identity of settlements, Strategic Gaps are identified as shown on the Policies map between the following areas:

- *Fareham / Stubbington and the Western Wards (Meon Gap)*
- *Fareham / Bridgemary and Stubbington / Lee-on-the-Solent (Fareham- Stubbington Strategic Gap)*

*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 distinctive nature of settlement characters.*

The Fareham / Stubbington Strategic Gap boundaries, as they stand, are at the current limits of the present settlements of Fareham and Stubbington. Recommendations in the Technical Review are that a change to the Strategic Gap area identified as 7b could be made, but seemingly within limits and subject to the sensitive use of Green Infrastructure. It does not, on repeated reading, suggest that the area described by allocation HA55 is an appropriate incursion to the Gap. HA55, together with the intrusion of the Stubbington Bypass and its hinterland, represents a substantial reduction in the area of 7b and, indeed, of the whole Strategic Gap.

The introduction of the Bypass, in effect, changed a Strategic Gap in two sections into one in four sections. HA55 then removes approximately 20% of that entire area. In addition it further reduces the biodiversity of the Strategic Gap. This is consistent with Fareham Borough Council's consistent failure to see how allowing development as it does fragments wildlife habitats to the point where wildlife ceases to be viable. HA55 has not as far as I am aware been subject to any study of wildlife present; as private, arable land this would not happen. However, I have seen deer on that land (as a commuter to London, I used to cycle along Longfield Avenue twice a day and frequently saw them.) It's fair to assume that other mammals, small or otherwise also live in the area, along with predators such as owls and foxes. While I am sure that when Hallam Homes builds, they will employ an "ecologist" as part of the Green infrastructure project, to mitigate the effects of the build, but by that time any wildlife will have either fled or been depleted; "mitigation" including area 7a (Fareham Borough Council's choice as the alternative site for Brent Geese and waders – they already use it, of course) will not really work as its proximity to HA55 and the elevated level of human activity will almost certainly ensure that little wildlife ends up there.

Finally, and not intended to be "ad hominem", it is worth noting that the change to the Strategic Gap appears to be against the wishes of the "Executive Leader" of the council. He has, on a number of occasions let residents know of his "six-year" campaign for a Green Belt in Fareham. The CPRE supports this:

“... the NPPF allows local authorities to designate Green Belt as part of the Local Plan process. It has been agreed that the PFSH authorities are to consider a new Green Belt as part of their forthcoming Statement of Common Ground and we would have hoped to see Fareham BC leading the way.

#### Development Strategy

Strategic Policy DS1 Development in the Countryside: CPRE Hampshire agrees with these principles but notes that a South Hampshire Green Belt could aid considerably in achieving these goals.

Strategic Policy DS2 Strategic Gaps: We note the decision to re-define strategic gaps (the Meon and FarehamStubbington (sic) gaps) and suggest that a new Green Belt could achieve this. An area could easily be defined to encompass the Meon Valley, which could link to an area of larger Green Belt to the north of the Borough in Winchester District.” (CPRE Regulation 19 Consultation response)

A Google search turns up several references to such a campaign by the Executive Leader as far back as 2015 and he repeated his “commitment” in an election leaflet in 2021: “We are working hard to ensure that a South Hampshire Green Belt is created including the Meon and Stubbington/South Fareham countryside strategic gaps.” (Bull Woodward: In Touch Election Special 2021)

It is unfortunate, then, that such a campaign seems not to have resulted in such a Green Belt, moreover that the Council’s latest plan seems destined to put a stop to such a possibility, specifically to overcome the perpetual 5YHS problem.