

Examination of the Fareham Local Plan 2037 - Hearing Statement – N John

Matter 2: Development Strategy

1) Development in The Strategic Gaps

In my written Hearing Statement for ‘Matter 1’ regarding the lack of Community Involvement in the development of this Plan, I noted that radical changes were made for this ‘Revised’ Publication Local Plan, to accommodate the U-turn in government thinking - insisting upon using out of date 2014 ONS data for the NPPF calculation rather than the more recent 2018 statistics.

It would seem that leaders at FBC took an ‘Executive Decision’ to resolve this by allocating virtually all of the additional housing requirement on the eastern half of the borough, and more than half of it to two new development sites clearly within the long-established Fareham-Stubbington Strategic Gap. This seems entirely contrary to feedback about the previously floated ‘Strategic Growth Area’ in the Gap and represents an abandonment of a Core value vociferously supported by all candidates at every public election.

To offset such criticism, the Executive claim that the proposed development ‘will not effect the function of the Gap’ and have commissioned a report ‘Technical Review of Special Landscape Quality and Strategic Gaps’ which amazingly endorses that these two sites (and only those two) could be conveniently removed from the Gap without degrading its function.

I would contest that Fareham already possesses ample independent reports which robustly define the existing Strategic Gap boundaries as being ‘*entirely necessary to provide physical and visual separation and prevent the coalescence of settlements*’. Producing a new report out of a hat which conflicts with previous studies is obviously contrived, and clearly only to rubber stamp specific proposals from property developers that FBC has been dealing with. I support my reasoning below.

Core Values and The Strategic Gap

One of the Core Strategies underpinning Planning in Fareham has always been to maintain the physical and visual separation of town and village settlements and their individual character. This should remain a core value underpinning planning decisions. CS22 was set out as ⁽¹⁾:

“Land within a Strategic Gap will be treated as countryside. Development proposals will not be permitted either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of settlements.”

It was necessary to specify the Gap boundaries, as they are now shown on the **Fareham Policies Map**. For this purpose, the ‘**Review of Strategic Gap Boundaries**’ was commissioned by FBC and conducted by the **David Hares** independent consultants in the summer of 2012.

In recent years, FBC has paid less than lip service to this, and now that other areas of the borough are under pressure, they seek to downsize the Gap. To justify new development therein, they say. *“Strategic gaps have been retained but they have been re-defined in the Publication Plan to focus on preventing settlement coalescence.”*

The implication here is that the Hares review was not sufficiently focussed on ‘settlement coalescence’. This is a slippery red herring as the 2012 study was definitely highly focussed on exactly that. It was challenged, re-validated and re-affirmed as entirely robust in this respect.

Criteria and Methodology

In 2014, as part of the Local Plan examination ⁽²⁾, 'Issues and Questions' were raised by the then Inspector (Mr M Hetherington) regarding the Gap Review.¹

(2) https://www.fareham.gov.uk/PDF/planning/local_plan/Examination/DCD06Issue2.pdf)

Specifically, he asked (Pf 2.2): *'Is the review of the boundaries sufficiently robust? Have appropriate criteria been used?'*. FBC responded (2.2.2) that the Review focussed on 41 subdivisions on land and the boundaries were reviewed according to CS22, including the three criteria added to CS22 at the Planning Inspector's request.

a) The open nature/sense of separation between settlements cannot be retained by other policy designations.

b) The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence.

*c) In defining the extent of a gap, **no more land than is necessary to prevent the coalescence of settlements** should be included having regard to maintaining their physical and visual separation.*

One representation (2.2.3) suggested that inappropriate methodology was used, and that some assessments were heavily weighted on *'green infrastructure'* rather than *'the minimum area needed to prevent coalescence'*. FBC refuted this and (in 2.2.7) *'considers that the review has provided a robust basis to inform the definition of the strategic gap'*.

Further to this, (in 'Matters Arising' Nov 2014) the Inspector asked the Council to explain the suitability of the methodology ⁽³⁾.

(3) https://www.fareham.gov.uk/PDF/planning/local_plan/Examination/DCD20ActionsArisingFromIssue2.pdf

FBC (See Pf 1.1) reaffirmed the Review to be 'a robust assessment of the Strategic Gaps' and to **demonstrate** this, FBC requested further explanation and justification from the report authors. In the Appendix, the David Hares' consultant explained that all 41 areas were assessed against the three additional criteria suggested by the Inspector, but some (west of the Meon, south of Warsash Road) had failed against the criteria [c] *"no more land than is necessary to prevent the coalescence of settlements should be included"*

These were therefore excluded from the Strategic Gap. By contrast, the remaining areas, as represented by the Gap in the Policies Map, clearly **PASSED this test**, so are **wholly and entirely necessary to prevent settlement coalescence**.

This would obviously include the land North **AND SOUTH** of Oakcroft Lane, and that South of Longfield Avenue.

It might be noted that the areas that failed the CS22 [c] test have now been included in the new Chilling ASLQ.

Effect of the By-Pass

In relation to proposed new road schemes, The Hares Landscape Architect (Lynette Leeson) said:

*Although the Fareham Gap Review did not specifically take into account the Stubbington Bypass and realignment of the southern portion of Newgate Lane we do not think these proposals would alter our recommendations for the boundary of the strategic gap in this part of the Borough. **The strategic gap between Fareham and Stubbington is vital to maintain the separate identities of the two settlements and the new road improvements should not compromise this.***

Furthermore, in relation to the effect of the Stubbington by-pass, the Planning Inspector (David Hogger) declared in his report of May 2015 ⁽⁴⁾ examining Fareham's Local Plan Part 2

(4) https://www.fareham.gov.uk/PDF/planning/local_plan/Examination/DSPCompleteInspectorsReport.pdf

*“Concerns were expressed regarding the delineation of the Strategic Gap boundaries and the methodology used in the Fareham Borough Gap Review. . . Having visited the area I agree with the Council **that the gap between Fareham and Stubbington is justified in order to retain visual separation** and that the proposed road improvements would not justify a revision to the boundary. **The Council's approach is sound.**”*

In ignoring the Hares Review and supplanting it with another, FBC's approach is distinctly UNSOUND

2020 Review of ASLQ Strategic Gaps ⁽⁵⁾

Having gone beyond the extra mile to assiduously test and uphold the David Hares analysis (at public expense), FBC is somewhat '**Hoisted by its own Petard**' when it now tries to concoct a new 'Review of Strategic Gaps' which mysteriously comes to different conclusions.

(5) **Review of ASLQ and Gaps** [Fareham BC Special Landscape Character and Strategic Gap](#)

This 'Evidence' document cannot be disputed directly by the 'consultation' mechanism as it forms part of the original 'Published Plan'. However, its conclusions regarding the Gaps can be taken with a pinch of salt, that have only become relevant in the new 'Revised Plan'. Suggestions that (**specifically and only**) 'Land south of Oakcroft Lane' and 'Land south of Longfield Avenue' - '*could be developed without compromising the Strategic Gap function*' are manifestly contrived to correspond to existing development proposals that the council is keen to pursue. **To suggest that these conclusions were uninfluenced by these proposals is ludicrous and disingenuous.**

The new Plan justifies this 2020 Review (3.10) by saying '*recent planning appeals where the function, and strength of, the strategic gaps were called into question*'. We often hear that '*an inspector said we should consider the size of our Gaps*'. These are more 'Red Herrings'. The Appeals and comments were in relation to proposals off Old Street, extending into the MEON gap. Perhaps the Inspector considered that the obvious (flooded) flood plain and distance to Warsash negated the need to define that Gap to avoid settlement coalescence.

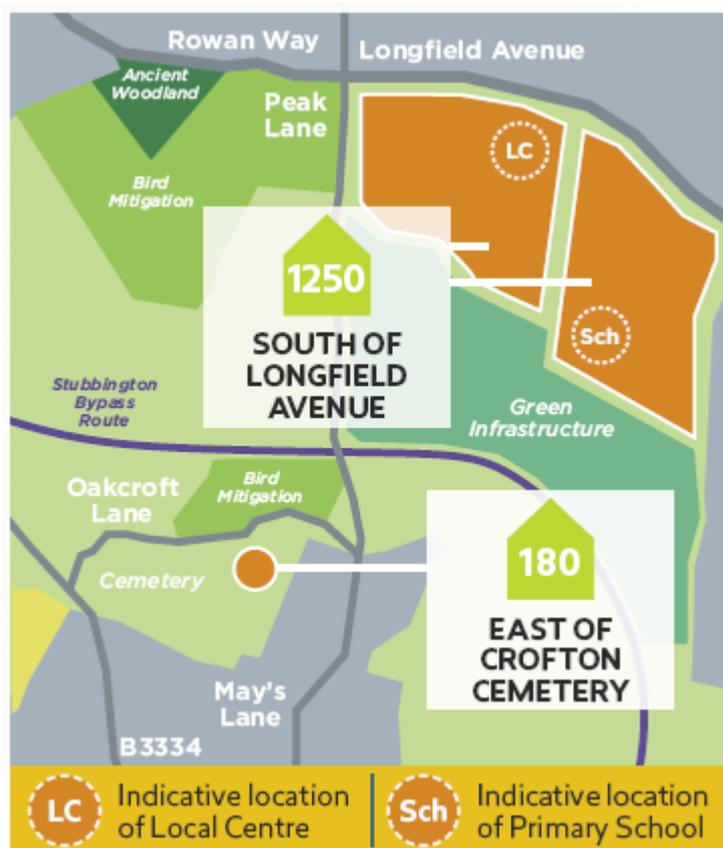
Curiously (one might say suspiciously), this report proposes no changes to the Meon Gap (irrespective of its ASLQ designation) implying it is still wholly necessary for segregation but bits of the Stubbington Gap can be sacrificed. It also defines another massive ASLQ to ring fence remaining land west of the Meon.

There has been NO suggestion from the Inspectorate that the Stubbington Gap is too big and NO reason to revamp the robust Hares report. All that has happened is that the Stubbington By-pass

(and certain developments such as The Grange) are proceeding to reduce the size of the Gap. All land that remains is clearly **even more essential** than as confirmed by Hares.

The document also makes a number of gaffes, including

- Claiming “*the isolated field that sits aside Crofton Cemetery, does not protrude into the landscape beyond the current Northern and Western edges of Stubbington*” is an **obvious lie**. Even before you add the Persimmon proposed access road which extends almost to the by-pass, the ‘field’ alone extends well to the north.
- “*It is too early to determine the full impact that Stubbington Bypass will have on the landscape character and development pressures in the Gap.*”. This suggests that until the by-pass is complete and re-landscaped with the promised trees, etc., it is **not possible to claim anything** would “*not compromise the Gap function*”. So why claim so?
- Although incredulously claiming that the two areas individually “*could be visually absorbed without compromising the Gap function*” it **fails to go as far as to say that BOTH developments could be done without compromising**. As they would both be creeping towards each other along Peak Lane, visual coalescence is inevitable.



The last point clearly illustrates a **failure of common sense** in both the Report and the Local Plan. To recommend deep encroachment into the Gap at the same point from both sides, having already taken out the middle with the By-pass, shows that it is driven by the developers not any objective consideration.

The 2020 ‘ASLQ and Gap Review’ is contrived (as is the Plan) and therefore UNSOUND.

2) Landscape and Areas of Special Landscape Quality (ASLQ)

The aforementioned 'Technical Review' commissioned by the FBC Executive also deals with ASLQ.

The presumption of protecting countryside (ASLQ) from development is generally a good thing and unlikely to cause any objection. Originally, 5 ASLQs were proposed (about the same time as the despised 'Strategic Growth Area' in the Strategic Gap). Now there is a small addition covering Cams golf course (!?) and another (much larger than any of the others) for 'Chilling and Brownwich Coastal Plain'.

The coast should be protected; however, this Chilling ASLQ extends nearly 3km inland, right to the Warsash Road. While I hope that this countryside is not developed, most of it is not significantly different to other countryside, in the Strategic Gap and elsewhere. The effect, and seemingly the purpose of this new ASLQ is to ring-fence and future-proof nearly ALL remaining land west of the Meon. (See map, p31 of the Plan).

It is odd that the authors can pronounce *ALL* of this wide area 'too good to build on' but then gouge pieces out of the Gap as '*unnecessary for its function*', where convenient.

Although ASLQs are a more recent designation than the established Strategic Gap, the wording of DS2/DS3 compared to the original CS22 indicates that ASLQ can now command a higher degree of protection than the Gap.

This suggests further evidence that the Local Plan seeks to direct housing development disproportionately to the East. I hope that the Inspector will share my concerns that the appearance of favouritism renders the Plan UNSOUND unless FBC amend it to be more even handed.