

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

### Matter 6: Housing Allocations

#### 6.6 and 6.7: Planning Proposals in the Stubbington Strategic Gap (HA54 and HA55)

##### Technical Reviews of The Strategic Gaps

In my previous Hearing Statements, and discussions regarding the Strategic Gaps, I queried why FBC had thought it appropriate to commission a new (2020) Technical Review of Strategic Gaps (at public expense) when it already possessed a rigorously examined and robustly verified ‘David Hares’ Gaps Review, which has defined the boundaries of the Strategic Gaps as we see in the current Policies Map. I documented the detailed debate about the Criteria and Methodologies used by Hares that were strongly upheld by FBC, and ultimately supported by the Planning Inspectors (Mr M Hetherington and Mr D Hogger). In particular, it was noted that the Hares report was guided by the criteria requested by Mr Hetherington, including that (CS22 part [c]) :

*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.*

Curious then, that FBC justified the 2020 Review so that the Gaps could be “*re-defined to focus on preventing settlement coalescence*”. If this just means that the new report was designed to ‘raise the bar’ on assessing what is ‘necessary’, we might have expected some parts of the MEON gap to have been highlighted, given that Appeals Inspectors had apparently commented that the Strategic Gap arguments for some development off Old Street (Meon Gap) were weak.

Instead, we see just two specific areas highlighted in the 2020 Report conclusions where development, it says, could be “*accommodated without compromising the Strategic Gap function*”. The fact that these two areas, are virtually opposite each other creating a pinch-point, encroaching towards where the remaining Gap is already under pressure from the new Stubbington By-Pass makes these conclusions somewhat inexplicable. How could ‘*visual and physical separation*’ not be affected?

When we add in that these two areas just happen to coincide with Development proposals at sites **HA54 and HA55** in Fareham’s published Plan, the report looks distinctly suspicious. In discussion on the first day of this Hearing, the Council representative, Mrs Gayle Wooten, admitted that there were “**conversations with the consultants regarding development proposals**”.

If the intention was to commission an objective report (like Hares) regarding the landscape value of all the borough’s Gaps and ASLQ, (which is what it purports to be) why would specific development proposals be discussed? Was FBC merely ‘asking for an opinion’ on these proposals? Well, if it was, the Report should have clearly stated that it was providing a specific requested opinion rather than apparently making ‘objective academic observations’.

I don’t doubt that the report’s authors have done some diligent professional work with good intentions, but it is undeniable that, at the very least, they would have been working under a knowledge that their clients would very much appreciate some usable conclusions that their preferred developments were not inconsistent with established Core Values and Strategies (not to mention election promises).

It has been suggested that the Hares Report is irrelevant because it preceded the NPPF. This is a complete **Red Herring**. The NPPF deals mainly with the calculation of expected demand whereas the Reports are about the supply landscape. There is absolutely no reason to suggest that criteria and methodologies need to be changed. The Hares 2012 conclusions remain valid regarding the appropriate boundaries of the Gaps, to support its intended purpose and have been more recently upheld by the Inspector's (Mr Hogger) report examining Fareham's LP2 in 2015, and the LDA land review of 2017. The addition of the Stubbington By-Pass clearly increases the importance of the remaining Gap landscape.

The 2020 Gap Review is seriously compromised (to put it mildly) and in any case redundant compared to the much more rigorous and validated Hares report. If FBC insists on supporting HA54 and HA55 (and similar), and this is upheld by the Inspector, they must all recognise that these developments WILL contribute to further settlement coalescence and declare that they wish to continue regardless. To try to pretend otherwise based on clearly contrived 'evidence' would be disingenuous.

#### **6.6 : HA54 – Land adjoining Oakcroft Lane and St Edmunds Churchyard (Crofton Cemetery)**

In earlier discussion of Strategic Gaps at this Hearing, there seemed to be some consensus about the purpose of the Gaps. This is best summarised in the LDA land assessment: 2017 (part 3 p34):

[LDA 09 Submission Plain A4 P \(fareham.gov.uk\)](https://www.fareham.gov.uk/lda-09-submission-plain-a4-p)

*“What is critical, however, is that there is a clear and distinctive experience of leaving one settlement behind, passing through another quite different area (the ‘gap’) before entering another separate settlement. This experience of travelling from out of one place into another can be both physical and visual. Importantly, the ‘bit in between’ needs to have integrity and distinct character as an entity or place in its own right, rather than simply be a physical space or feature, such as a field or a block of woodland etc., in order for the two settlements to feel distinct and separated”*

In this, Hares recognises that the area both North **AND SOUTH** of Oakcroft Lane need to be included in a Strategic Gap, not just to assure physical and visual separation but also recognising the need to experience a 'gap' between the settlements. CS22 Part [b]:

*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.*

#### **Country Lanes**

The Housing Allocation HA54 corresponds directly to planning applications from Persimmon Homes, adjacent to Oakcroft Lane. As Peak Lane, Ranvilles Lane and Tanners Lane are already compromised by the By-pass, Oakcroft is one of the few remaining 'Country Lanes' in the borough, possibly the only one on the eastern side.

It is important (see LDA above) that there are areas where one can 'experience' the countryside between the urban settlements. Oakcroft provides that 'experience' only because there is countryside on both sides. If HA54 proceeds, it will become a built-up settlement boundary and need various urbanising upgrades to handle the extra traffic, safety, etc. I would expect widening, streetlamps, Armco barriers, speed signage, railings and lots of paint.

## **St Edmunds Churchyard and Cemetery**

It also provides a quiet access to St Edmunds cemetery, forming its northern side. 'The Grange' development has already been given planning permission to the west of the church and cemetery. If HA54 proceeds the church and grounds (NB of Saxon origins) will no longer have any 'edge of village' ambience, instead it will be subsumed into suburban housing estates. This is a major degradation of the *settlement character of the area*' and further explains why this land must remain in a protected Strategic Gap. The hitherto rural site of St Edmunds church is a jewel of Fareham's historical legacy, with very few comparable features in the borough. It is distressing to see that this is to be so easily given up.

Planning permission has already been granted for 23 homes to the East of the churchyard at 'The Grange'. This development would further damage the rural setting, surrounding the cemetery with housing.

## **Inconsistent with Neighbouring Settlement (HA54)**

The 180 homes proposed (now 206 on Appeal) is not a modest development. The last major development on the northern edge of Stubbington was Marks Tey Road, which only contains 78 houses. Even with Discovery and Newton Close, etc, there are well under 100. The 206/180 proposed will be MUCH more densely packed and create a massive carbuncle extending way north of Stubbington. Any suggestion that this is 'rounding off' Stubbington should be dismissed. When 'Summerleigh', 'Three Ways' and 'Farm House Close' (and now 'The Grange') were proposed, forming 'spikes' out along the Stubbington northern access roads, it was vehemently denied that these would be an excuse to extend 'filling in' development along Oakcroft Lane.

The Marks Tey development itself was undoubtedly opposed when originally proposed but placated at the time as being 'a natural reduction in housing density moving away from the village centre'. The HA54 plan cranks up the housing density – perhaps for eventual merging into Fareham?

Unfortunately, FBC planning officers appear to be complicit in the U-turn in FBC favouring this development. Compare Peter Kneen's reports on Persimmon development applications in 2019 and 2021. In 2019 his report on the 261-home proposal gave 21 separate, strong reasons recommending the proposal be refused.

After the government U-Turn on the 2018 ONS stats, the FBC Executive clearly reverted to its enthusiasm for building in the Gap for purely numerical reasons. Dutifully, Mr Kneen's 2021 report on the 206-home re-submission reveals a completely different mindset, miraculously reversing his previous concerns and recommending approval. This does not represent objective planning consideration. Fortunately, enough councillors saw through this and rejected the application, against 'advice', leaving the Chairman grumbling about "having to fight expensive appeals". Reports commissioned by FBC need to be viewed with some scepticism.

## **Planning Appeal (HA54)**

Unfortunately, armed with Mr Kneen's report, and also the Revised Local Plan published by the Fareham leadership advocating the HA54 180-home development, an Appeal was inevitable, and the Appeal inspector clearly heard this appeal on the basis of '*Fareham v Persimmon*' where Fareham had apparently already conceded the desirability of the development in principle so questions were only really considered about the detailed proposal designs.

It was inappropriate in my view to hold that Appeal when the Local Plan Review of Fareham's general planning allocations was imminent and pertinent to deciding the soundness of FBC's allocation strategies.

### **Sustainability and Local Resources (HA54)**

The clear reality is that the proposed site is too far from Stubbington Centre (or other facilities) for walking or cycling. New residents will need at least one car per home and there will be a lot more than this. Worse than that, it was pointed out by 'The Fareham Society' that vehicular access to Stubbington' is also lengthy. Residents will have to drive beyond the far northeast of the development, almost to the by-pass, in order to turn back south onto Peak Lane to get into Stubbington. It will be easier to drive on to Fareham for shopping or recreation, which together with commuting, is going to add to Fareham's increasing Air Quality issues.

Thus, the proposed development would not be part of the Stubbington community at all. Due to proximity, it will draw on the catchment of the schools and medical centre (overloading already overstretched capacity) but will not contribute to local businesses. With likely 200+ more children, the local Anne Dale and Crofton schools will need an additional Class for every school year. I don't believe this is sustainable on the school sites. The Medical Centre is at collapse already.

In summary, HA54 would be an ugly estate, inappropriately forced on to the natural edge of a village. It would really have no connection to the village community and would just be a commuter ghetto draining the village community facilities while taking a large chunk out of the Strategic Gap (and adding to the commuter traffic and air quality issues that are a serious concern through Fareham town).

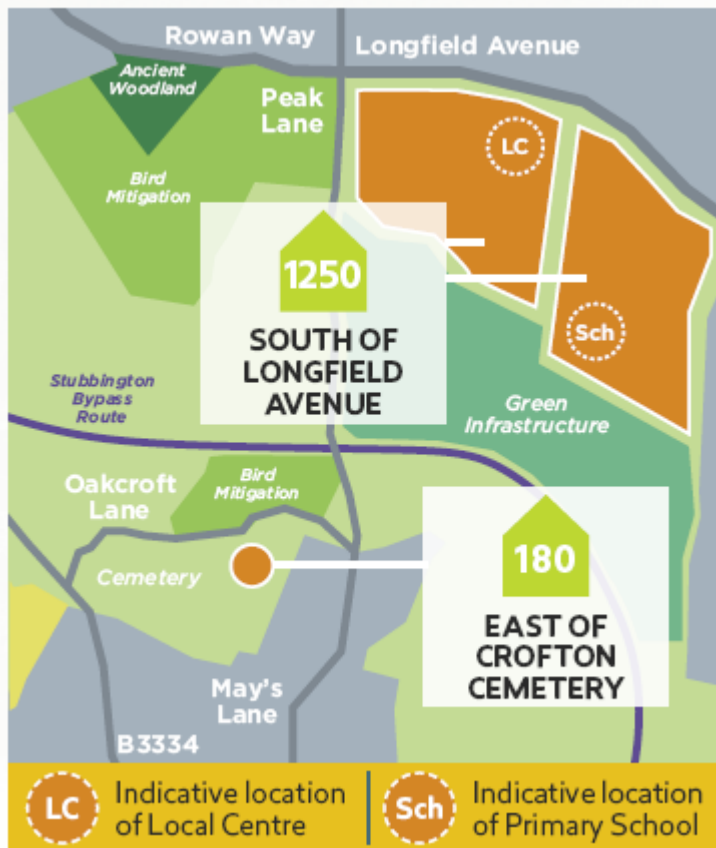
### **Peak Lane and the Stubbington By-pass (HA54 and HA55)**

The 2021 'Review of ASLQ and Gaps (for example, see my PART 4) lists on p97 the vehicle routes where the Strategic Gap can be 'experienced'. Oakcroft Lane is not even mentioned! It appears that this country lane was already written off in the author's mindset. It does mention Peak Lane, which will lose all of its 'Country Road' appeal if HA55 and HA54 go ahead.

Travelling South, on 'Peak Lane', we would first see the fields on the left replaced by the HA55 housing estate, almost immediately hit the by-pass junction (which will be an acre of tarmac, traffic signals, etc), a few yards later meet the HA54 access road junction, then a bit later the HA54 estate itself.

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 this Plan is driven by the developers not by any objective consideration. This is a **failure of common sense** in both the Report and the Local Plan indicating that they are UNSOUND.

The Stubbington By-pass was approved (by HCC, etc) strictly on the understanding that it would not be an excuse for in-filling or attract more housing that would undermine its purpose of relieving congestion. That these new developments, HA55 and HA54 will feed into Peak Lane rather than directly onto the By-pass itself, is a somewhat disingenuous ruse.



### **6.7 : South of Longfield Avenue (HA55)**

I will leave detailed criticism here to others. Suffice to say it is an ENORMOUS development. Squeezed between Fareham and Stubbington, the effect on Traffic, Air Quality, Wildlife, Local Resources, etc. cannot be underestimated.

Regarding its effect on the Gap (in complete contrast to the new Gap Review), see LDA Design part 3 p42:

*“CONCLUSION. This area is a cohesive agricultural landscape which performs multiple roles in respect of the primary and secondary purposes and functions of the Strategic Gap. Even minor encroachment beyond the existing, strong settlement boundary along the southern edge of Fareham could potentially disrupt local settlement pattern and character and have an adverse effect on the Gap functions and the overall integrity of the agricultural landscape”.*

At the very least, both HA54 and HA55 cannot be included in the Plan. Even the questionable 2020 ‘Technical Review of ASLQ and Gaps’ does not actually say that *both of these* can be pursued without affecting the function of the Gap. Suggesting they can both proceed is a failure of common sense and clearly motivated by securing quick ‘low hanging fruit’ rather than any objective reasoning

The new policy C11 that seems to replace CS22 should re-educate Planners about the true purpose of the Gap and the need to maintain an area where ‘countryside’ can be experienced in the Gap. The protection against development in the Gap must clearly be defined as equal or greater than the ASLQs.