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Please ask for:



8<sup>th</sup> December 2017

By e-mail

Dear Ms Burnett

### **Draft Fareham Borough Local Plan 2036**

Following Gosport Borough Council's consideration of the Draft Fareham Borough Local Plan 2036 (DFLP) at its Regulatory Board of 6<sup>th</sup> December 2017 the Council would like to make the following representations.

#### **Summary of comments**

- This Council considers that Fareham Borough Council (FBC) has not fully met its responsibility under the duty to cooperate as the Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.
- That in the light of the requirements of the PUSH Spatial Position Statement and the Government's potential new standard methodology for calculating housing requirements, FBC consider whether there is the potential for any additional housing sites which are suitable, available and achievable (Policy H1 and Policy DA1).
- That FBC considers whether there is any potential to increase the affordable housing requirement from 30% (Policy H2).
- That this Council strongly objects to the proposed residential allocation at Newgate Lane for the reasons set out later in this submission (Policy HA2) and summarised below:
  - The proposal would physically and visually diminish the long-established Strategic Gap between Gosport/Fareham and Lee-on-the-Solent/Stubbington;
  - The proposal has the potential to negate the benefits being provided by the new improvements to Newgate Lane with a negative impact on traffic flow and increased congestion to the detriment of Gosport residents and the

local economy including accessibility to the Solent Enterprise Zone at Daedalus;

- The proposal has the potential to significantly harm the amenities of local Gosport residents with the introduction of new access points to existing residential areas, which due to the scale of the proposal would potentially lead to a significant increase of traffic on residential roads;
  - The proposal, as described, is very car dependent with no provision for public transport. This would exacerbate the amount of trips using Newgate Lane;
  - Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and this may be difficult to mitigate given the scale of the allocation and limited public transport choice;
  - There is insufficient information on supporting infrastructure required including education, medical and community facilities;
  - There is no provision in the policy to protect the amenities of existing residents in the vicinity.
- That this Council supports the additional employment allocation at Daedalus (Policy SP3) with further comments highlighted later in this submission.
  - That this Council supports the following policies:
    - Policy E5: Boatyards which aims to protect important marine sites for employment purposes;
    - Policy INF2: Sustainable Transport which aims to ensure the accessibility of existing highways networks are not harmed and provision is made for public transport and active travel;
    - Policy INF3: Road Network Improvements which safeguards the route of the Stubbington Bypass;
    - Policy D4: Coordination of Development and Piecemeal Proposals which aims to ensure a coordinated approach to development.

These matters and a number of other comments are further detailed in the following sections and are based on the Council's Regulatory Board Report and its subsequent resolution.

### **Duty to Cooperate**

Local authorities are expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination.

The national Planning Practice Guidance (PPG) states that local planning authorities and other public bodies need to work together from the outset at the plan scoping and evidence gathering stages before options for the planning strategy are identified. This will help to identify and assess the implications of any strategic cross boundary

issues on which they need to work together and maximise the effectiveness of Local Plans.

This Council is particularly concerned regarding the impacts of the proposed residential allocation of Newgate Lane on residents and businesses of Gosport Borough (as detailed later in this submission). The Council considers that FBC have not had any meaningful engagement with Gosport Borough Council (nor Hampshire County Council, as the highway authority) on the proposed allocation, particularly regarding key cross boundary matters such as the designation of the Strategic Gap, and key infrastructure issues including transport, education and health.

With regard to the duty to cooperate the PPG states that planning for infrastructure is a critical element of strategic planning. The National Planning Policy Framework (NPPF) (paragraph 162) makes clear that local planning authorities should work with other local planning authorities and providers to assess the quality and capacity of a range of infrastructure types. This will ensure that key infrastructure such as transport, telecommunications, energy, water, health, social care and education, is properly planned. Planning for infrastructure is therefore a key requirement of the effectiveness element of the test of Local Plan soundness, which requires plans to be deliverable and based on effective joint working on cross boundary strategic priorities.

**Housing requirements**

The DFLP makes it clear that providing new homes to address housing need is a critical part of any Local Plan and a key requirement of the NPPF. Its development strategy aims to use previously developed land where available and greenfield land around the edges of existing urban areas in order to meet remaining housing needs but otherwise it states that it aims to strictly control development outside urban areas.

The DFLP makes provision for 11,300 dwellings over the period 2011-2036 (452 dwellings per annum). This figure has been informed by the PUSH Strategic Housing Market Assessment (SHMA Jan 2014) with an Objectively Assessed Housing Need (OAHN) Update published in April 2016. Subsequently the PUSH authorities considered the potential distribution of most of the housing requirement to 2034 and included this in the PUSH Spatial Position Statement (H1) (June 2016).

The various requirements of the OAHN, the PUSH Spatial Position Statement and the dwelling figures included in the DFLP are summarised in the table below:

**Table 1: FLP Dwelling Target in comparison with OAHN and PUSH Spatial Position figure**

	Timeframe	Borough total	Annualised
PUSH SHMA and Objectively Assessed Housing Needs (OAHN) (April 2016)	2011-2036 (25 yrs)	10,500	420
PUSH Spatial Position Statement	2011-2034 (23 yrs)	10,460	455 <sup>1</sup>
Fareham Local Plan 2036	2011-2036	11,300	455 (2011-2034) 420 (2034-2036)

It is therefore recognised that the DFLP meets the April 2016 OAHN requirements

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<sup>1</sup> Rounded

over the period to 2036 by over 7%. It also noted that the sources of housing supply identified in Table 2 below, is currently higher than the DFLP requirement of 11,300.

**Table 2: Sources of supply**

Housing supply source	Number of dwellings
Housing completions (2011/12-2016/17)	1,859
Planning permissions	1,136
Windfall	1,320
Welborne (up to 2036)	3,840
Fareham Town Centre housing allocations	577
New Housing allocations	2,827
<b>Total</b>	<b>11,559</b>

It is important to recognise that the PUSH Planning Position Statement (paragraph 5.30) identifies that across the mainland PUSH area there is a shortfall of 6,300 dwellings (or 6.5%) to 2034 and when the Portsmouth housing market area (HMA) is considered separately there is a 4,180 dwellings shortfall (or 9%). Fareham Borough is located with the Portsmouth and Southampton HMA's and the inter-relationship between the two areas is recognised.

The PUSH Position Statement states that, *"Local authorities should actively seek opportunities to identify additional potential for housing provision to address the shortfall against the objectively assessed need through the local plan process" (H1)*. It adds that, *"any such potential opportunities will be tested against the principles of sustainable development set out in the National Planning Policy Framework and this Position Statement."*

The proposed dwelling figure in the DFLP in effect reduces the overall shortfall of the PUSH mainland requirement by 800 dwellings<sup>2</sup>. A significant question is whether there is sufficient capacity in the remaining parts of the Portsmouth HMA (Gosport, Havant, Portsmouth, Winchester (part) and East Hampshire (part)) to meet the remainder of this shortfall; if this cannot be demonstrated and if Fareham are unable to adequately justify why sites have or have not been allocated the Fareham Plan may be deemed to be unsound.

It is also important to recognise that the Government has recently consulted on a standard methodology to calculate housing need in a document entitled *'Planning for the right homes in the right places'*. Plans submitted to the Secretary of State after 31<sup>st</sup> March 2018 will need to use the new standard methodology. FBC are proposing to submit their plan in Autumn 2018. The latest calculated need figure included with the Government's consultation document highlights a figure of 531 per annum for Fareham Borough compared to the current figure for Fareham (420 per annum). This would result in an allocation requirement of 13,275 dwellings as opposed to 11,300 dwellings during a 25 year period.

The new methodology also requires a *'Statement of Common Ground'* to be produced between neighbouring local planning authorities which would form part of the statutory duty to cooperate. On this basis the PUSH authorities need to continue

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<sup>2</sup> Based on the following calculation  
 The OAHN figure for Fareham Borough between 2011-2036 is **10,500** (Table 1 of the PUSH Spatial Position Statement)  
 The DFLP proposes **11,300** dwellings. 11,300- 10,500=**800**

to work collaboratively to meet the housing market shortfall and FBC needs to be satisfied (and be able to satisfy the Inspector) that it has explored all other opportunities which are suitable, available and achievable, and can be tested favourably against the relevant sustainability principles set out in the NPPF.

### **Affordable Housing**

Policy H2 of the DFLP relates to affordable housing which requires that on sites of 11 or more (or residential proposals with a total floorspace exceeding 1,000m<sup>2</sup>) proposals shall provide 30% of dwellings as affordable housing or 20% within the Fareham town centre boundary. This is based on a viability assessment. This would include the requirement that 10% of the overall dwellings on site would be an affordable home ownership product.

The Gosport Borough Local Plan 2011-2029 (GBLP) requires 40% affordable housing on sites of 10 or more. The affordability of dwellings in Fareham Borough is an issue. For example, the ratio of median house price to median gross annual workplace earnings is 9.22 in Fareham compared to 7.01 in Gosport. In the light of this and the fact that Gosport Borough has been able to achieve 40% affordable housing on numerous sites, FBC may wish to consider seeking a higher proportion of affordable housing. This may require re-examination of the assumptions made as part of their housing viability work. If there are viability issues these can be addressed as part of the provisions of the policy which outlines an open book approach with a third party assessment of development viability.

### **Newgate Lane Housing Allocation**

In order to meet its housing requirement the DFLP identifies a number of housing allocations across the Plan area. Of particular relevance to Gosport Borough is the allocation of land at Newgate Lane for between 370 and 475 dwellings (Policy HA2).

It is acknowledged that FBC needs to find sufficient land to meet its housing requirements and that dwellings at this site would also assist in meeting the needs of people living in Gosport. However, there are a number of significant issues raised by this allocation, which are outlined below, and which it will be necessary for FBC to fully consider.

#### *Strategic Gap*

In order to accommodate the Newgate Lane residential allocation the DFLP proposes to amend the Strategic Gap between 'Fareham/Bridgemark and Stubbington/Lee-on-the-Solent', which is identified in the GBLP (Policy LP3) and FBC's current Local Plan (Policy CS22 of the Core Strategy). GBC and FBC have worked collaboratively in the past to define the boundaries of the Strategic Gap and have been successful in maintaining a functional gap and visual separation between the settlements.

The sub-regional PUSH Spatial Position Statement states that Councils should identify in their Local Plans strategic countryside gaps of sub-regional importance and that these gaps are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. It recognises that gaps can provide the space for necessary uses such as recreation areas, transport corridors and environmental mitigation.

FBC's current Policy CS22 states that '*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 the settlements’.* The Policy recognises that maintaining separation will prevent coalescence of the settlements in this densely settled part of South Hampshire.

The justification text states that gaps between settlements help define and maintain the separate identity of individual settlements and have strong local support. It adds that Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. It acknowledges that continuing pressure for high levels of development mean that maintaining gaps continues to be justified.

It is considered that this remains relevant in the case of the Newgate Lane area. Indeed the current boundary has been supported by a Planning Inspector as recently as May 2015. In his report into the Examination in Public for the Fareham Local Plan Part 2, the Inspector refers to FBC’s evidence regarding the review of Strategic Gaps and states,

*‘although the review did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. 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.’*

The latest DFLP also includes a policy relating to Strategic Gaps (Policy SP6) which continues to prevent the coalescence of urban areas and to maintain the separate identity of settlements. It also identifies a Strategic Gap between *‘Fareham/Bridgemyr and Stubbington/Lee-on-the-Solent’*. It states, *‘development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements’*. The justification text acknowledges 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’*. It also clearly states in Paragraph 4.39 that, *‘further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemyr along with maintaining the separate identity of Peel Common.’* This therefore appears to contradict the removal of the Newgate Lane area from the Strategic Gap.

The proposed removal of this land from the Strategic Gap also appears to be at odds with FBC’s own supporting evidence. The Fareham Landscape Assessment (2017) incorporates a review of the Strategic Gap designation including the ‘Woodcot area’ which includes the land covered by the proposed Newgate Lane allocation. It concludes,

*‘This is a cohesive area of undeveloped landscape which performs an important role in respect of the primary purposes of the Strategic Gap i.e. in defining the edges, separate identity and settings of Fareham and Gosport, preventing their coalescence. Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap. It is recommended that the Gap boundaries remain unchanged.’*

Gosport Borough Council agrees with these findings set out in the Fareham Landscape Assessment and considers that the Woodcot area should remain an integral part of the Strategic Gap.

Whilst it is recognised that the local plan process is the appropriate time to review such designations it is considered that the proposed change at Newgate Lane will affect the integrity of the remaining gap by significantly reducing its width. The residential proposal by its sheer scale will undoubtedly harm the integrity of the gap and will diminish the physical and visual separation of the settlements.

*Transport and accessibility*

The Council also objects to the proposed allocation due to the potential negative impacts on the new Newgate Lane route. The new route was designed to achieve the following:

- improving access to the Peninsula including the Solent Enterprise Zone at Daedalus;
- increasing capacity and easing existing congestion on the route;
- creating fewer interruptions to traffic flow caused by turning traffic, or on-road cyclists;
- improving the alignment for safety reasons.

These objectives would be undermined by the proposed development. It was not intended that the improvements would facilitate new housing development.

The DFLP is accompanied by an Interim Transport Assessment for the DFLP allocations (Oct 2017) which recognises that the current Volume over Capacity (v/c) exceed 100% in the PM peak on Newgate Lane and is approaching available practical capacity in the AM peak resulting in significant congestion. Consequently it is already recognised that traffic exceeds the available capacity on this strategic route. Table 3 summarises information from this document which highlights that this situation is predicted to worsen over the period to 2036 and consequently the report recognises that Newgate Lane will experience ‘more noticeable increases in traffic flow.’

**Table 3: Road capacity on Newgate Lane**

	Volume over Capacity (v/c) on Newgate Lane		
	2015	2036 Baseline: Existing adopted local plan commitments (S Hants) with planned transport improvements*1	2036 Baseline plus DFLP allocations*2
AM	83%	98%	100%
PM	102%	106%	107%

\*1 including Stubbington Bypass and Newgate Lane improvements  
 \*2 this does not include any potential growth in Gosport Borough arising from the Gosport Borough Local Plan Review

At the present time this allocation has not been assessed by the Local Highway Authority to determine the implications on the highway capacity of Newgate Lane and no modelling work has been assessed to consider the trip generation from this level

of development, either in terms of numbers of additional vehicles or their likely distribution on the highway network or highway safety. Therefore the Council has no option but to object to the proposed allocation in the DFLP on this issue at this stage. Gosport Borough Council is very concerned that the proposed allocation will have a detrimental impact on the existing significant congestion problems on the Gosport Peninsula and detract from recent and proposed improvements that aim to improve traffic flow to, and from, the Peninsula. This is critical for the future economic prosperity of the Borough including achieving the full potential of the Enterprise Zone.

The north-south movements along Newgate Lane should not be hindered by any proposed new access arrangements for the proposed allocation and the Council objects to any proposals which will significantly hinder this flow. A new access off the proposed roundabout will introduce an interruption to traffic flow, particularly as it is envisaged to serve the whole development and that by its location and limited transport choice the proposed allocation would be very car-dependent. Indeed the supporting FBC Sustainability Appraisal concedes that the *'majority of sites [in the DFLP] are sustainably located which will improve accessibility and encourage travel by sustainable modes, although the urban fringe sites at Funtley Road and Newgate Lane South are less sustainably located.'*

Due to the lack of detailed available information it is not known what the likely impacts will be on the links and junctions further north e.g. the northern section of Newgate Lane, the Longfield Avenue roundabout, the northern section of the A32 and the Quay Street roundabouts and beyond to the M27 Junction 11. Additionally, vehicles travelling south from the site will also reduce the capacity of the recently improved Peel Common Roundabout, which may also have significant implications for traffic queuing on Rowner Road.

Given that the proposed allocation may well negate the benefits gained by the Newgate Lane road improvements it will also be necessary to consider whether this site together with other potential residential developments on the south side of Fareham could cumulatively have a detrimental impact on the function and objectives of the Stubbington Bypass. It is important to note that the DFLP states in paragraph 11.46 that the Stubbington Bypass is not being provided with an intention of serving or facilitating additional new homes. FBC is therefore not being consistent in its policy approach between the Stubbington Bypass and the Newgate Lane improvements.

The Newgate Lane allocation policy (HA2) includes a criterion that makes provision for off-site highway improvements and mitigation works, however, this Council requires further details of such measures, and questions whether the principle of any proposal at this site would be able to satisfactorily mitigate these impacts.

The Council is also concerned that the proposed allocation would not meet the requirements of the DFLP sustainable transport policy (Policy INF2). Amongst other things, this policy aims to ensure that development:

- does not demonstrate a severe cumulative impact (causing demonstrable harm) on the operation, safety or accessibility to the local or strategic highway networks; and
- mitigates impacts on the local or strategic highway networks arising from the development itself, or the cumulative effects of development on the network, through provision of improvements or enhancements to the existing network to accommodate additional traffic; or contributions towards necessary or relevant transport improvements.



In the light of the above policy it is considered that the proposed allocation may not be able to provide any meaningful improvements to satisfy these requirements given the current and ongoing access issues to and from the Gosport Peninsula.

The DFLP originally proposed two other vehicular accesses (in addition to Newgate Lane) which link the potential new allocation to the existing residential communities in Gosport. This includes Brookers Lane as a secondary access for a limited number of dwellings.

The other proposed access off Tukes Avenue has now been withdrawn following a recently issued addendum by FBC which reads, *'The site promoter has advised Fareham Borough Council that the potential access identified via the demolition of two houses on Tukes Avenue (165 and 167) is a factual error. The site promoter has confirmed that potential vehicle access via these properties is not being pursued'*

Notwithstanding that the residents of these and adjacent properties were most unfortunately not previously notified of these proposals, it is not clear from this statement whether the site promoter will be seeking an alternative access on the eastern boundary. It is considered that any such access points from housing areas within Gosport, will add to traffic on the local highway network within Gosport, which again has not yet been quantified in terms of number/distribution and junction/link capacity. The nature and scale of these access points will have a direct impact on their use/attractiveness, particularly if through routes are created. The creation of such accesses may create rat-runs through the existing residential areas within Gosport, due to perceived journey time savings compared with joining Rowner Road/Peel Common Roundabout. This could be exacerbated with the development of the Stubbington Bypass.

Despite the addendum significant concerns remain regarding any proposed access onto Tukes Avenue. These include:

- The amenities of neighbouring residents as an access road will serve a considerable number of dwellings;
- The capacity of Tukes Avenue and adjoining roads to take the additional traffic; and
- The proximity to facilities such as Woodcot Primary School and the impact on pedestrian safety.

There is no mention of improving public transport with regard to the proposed allocation. This needs further consideration to reduce the site's car dependency which would add further pressure on Newgate Lane. This will also have a detrimental impact on the existing Air Quality Management Areas within Fareham. It will be necessary to explore strategic transport options such as the potential for a new bus rapid transit link which could connect Lee-on-the-Solent, Daedalus, Newgate Lane, and the Busway through to Fareham.

Cycle and pedestrian links to the adjacent Bridgemaury and Peel Common are identified in Policy HA2.

#### *Residential amenities and design*

Any development of this scale on greenfield land will create significant concerns from existing residents particularly in areas immediately adjoining the site. It will be critical that their amenities are not harmed by any future proposals on this site and this

should be reflected in Policy HA2.

### *School provision*

Provision is included in the policy to ensure improvements to local schools and early-years childcare (as identified by the Local Education Authority). However, there is insufficient detail of how local school places could be affected by the proposals. It will be necessary to understand the impact of the new housing development on local schools as any development on this site is likely to include a high proportion of households with children.

### *Community facilities*

It will also be important to understand whether any new development at Newgate Lane can be sufficiently supported by other community facilities in the area including health facilities (such as GPs) and community hall provision and whether it is necessary to provide new community facilities as part of the development. Consequently without such information such proposals cannot be supported.

Policy CF1 of the DFLP recognises the need for community facilities as part of large residential developments and that these should be delivered to prescribed timescales to meet the needs of the community. The DFLP specifically mentions Bridgemary School as the primary location for community facilities (sport pitches, courts, hall and stage, and various meeting and conference rooms for hire). It states that these facilities are generally less than 1km from within the allocation and that it is not considered necessary for additional space to be provided with the allocation.

Policy LP32 of the GBLP requires the consideration of community facilities for new residential developments (normally for sites of 100 dwellings or more). It is therefore considered appropriate for FBC to further assess the community requirements of a development of this scale and include such provision within Policy HA2.

### *Open space*

The proposals as set out in Policy HA2 include a number of open space requirements including:

- Neighbourhood Equipped Area of Play (NEAP) and a Multi-Use Games Area for older children on-site;
- Improvements to existing off-site sports facilities at Brookers Field and Tukes Avenue which are GBC-owned facilities.
- The potential to take a financial contribution to improve sports pitch provision and associated facilities at Tukes Avenue Open Space and/or Brookers Field Recreation Ground.

It will be necessary to ensure such provision meets the requirements of any new community without affecting that enjoyed by existing residents.

### *Air quality*

Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and therefore it would be necessary to include measures mentioned in Policy INF2 specifically to mitigate this impact for this development allocation. This may be difficult for a development of this scale with limited public transport choice. The issue of air quality is highlighted in the Interim Traffic Assessment which notes that in January 2017, Fareham and Gosport Environmental Health Partnership issued the Annual Status Report 2016, which concluded that both the existing AQMAs need to

be extended as locations outside of the AQMAs had exceeded the annual mean NO2 objective for Fareham. The AQMA extensions were agreed in October 2017.

### *Drainage*

The area includes a number of drainage ditches which are part of the River Alver catchment. The development allocation proposes to retain and enhance these drainage ditches as part of a Sustainable Drainage System (SuDS). It will be important to understand the impact of any development on potential for surface water flooding in the vicinity and the water quality of the River Alver.

### *Natural environment*

It is recognised that the proposal aims to retain existing field and tree boundaries and to incorporate street trees and verges to reflect the character of Bridgemary.

## **Employment policies**

### *Employment floorspace requirements*

The Draft Plan is proposing 130,000m<sup>2</sup> of new employment floorspace for the whole of Fareham Borough (Policy E1) which is based on the figure included in the PUSH Spatial Position Statement with the additional two years included on a pro-rata basis (and then rounded to nearest '000 m<sup>2</sup>).

### *Daedalus*

Of particular interest to Gosport Borough is the proposed extension to the employment allocation at Daedalus (Policy SP3) which will result in an additional 48,000 m<sup>2</sup> of employment floorspace with a total of 98,000m<sup>2</sup> of light industrial, general industrial and warehousing floorspace (B1c, B2 and B8 uses) with ancillary office accommodation (B1a) plus 4,000sq.m of retained floorspace. This extended area includes the 2<sup>nd</sup> runway on the Daedalus East part of the site.

The Policy makes provision for:

- an employment hub that contributes positively to the creation of aviation, non-aviation and skills/innovation employment clusters;
- ancillary service infrastructure and facilities to support the Solent Airport, and Faraday and Swordfish Business Parks;
- broad aviation uses which support the long term sustainability of the airfield;
- strategically important energy and communications infrastructure;
- skilled jobs that take advantage of and develop local skills; and
- accessible public open space and enhancements to the strategic green infrastructure network.

In principle, this additional area allocated for employment is strongly supported as it will bring additional jobs and investment to the Peninsula which will be accessible to Gosport residents and reduce out-commuting on the A32.

However, it is important to raise a number of concerns with FBC which are set out below.

- No mention is made of the Daedalus Waterfront area and the cross boundary issues. The Council consider that the policy and justification text needs to recognise the full context of the site and that part of the Daedalus site is within Gosport Borough. It is important to recognise the opportunities of the Waterfront and how these contribute to the success of the whole site. It will

also be important to consider issues across the boundary including those relating to the provision of infrastructure in order not to prejudice delivery of the Waterfront.

- It is important that the proposed additional employment allocation set out in Policy SP3, which is over and above that set out in the original Outline Planning Permission, is subject to additional evidence with regard to issues such as transport movements. This is necessary in order not to prejudice development on those parts of the site that already have Outline permission. These areas may come forward at a later date than the proposed allocation due to issues relating to contamination and the presence of important heritage assets that may affect the overall viability and speed of delivery.

The Strategic Gap covering Daedalus including the Airport and the extended employment allocation will remain in order to prevent coalescence of the Stubbington/Lee-on-the Solent with Fareham/Gosport. It is proposed that the additional development at Daedalus will be perceived as an 'isolated' campus style commercial development within the airfield site which has a separate identity rather than an extension of the surrounding urban area. There needs to be a specific criterion in Policy SP3 regarding this issue to ensure that the appearance and function of the Strategic Gap is sufficiently protected with more detailed guidance as part of the justification text.

#### *Marine economy*

The other main employment policy of particular relevance to the Gosport economy is Policy E5 which relates to boatyards. This policy aims to protect marine-related employment uses. This policy is supported as the availability of waterfront sites around the Solent is limited and the marine businesses they support contribute to one of the key sectors of the sub-regional economy.

#### **Transport**

The DFLP safeguards the land required for the Stubbington Bypass and associated junctions (Policy INF3). It recognises that this route forms part of Hampshire County Council's plan for improving access to Fareham and Gosport and seeks to ease congestion, improve safety and the area's economic prosperity by encouraging investment and regeneration, including at the Solent Enterprise Zone at Daedalus. The accompanying text acknowledges this will create a reliable route for traffic wishing to travel from the Gosport Peninsula westwards towards the M27 at Junction 9, in conjunction with recently completed works at St Margaret's Roundabout on the A27, and works underway to upgrade the A27 between the Titchfield Gyratory and Segensworth to two lanes in both directions. It states that the bypass is not being provided with an intention of serving or facilitating additional new homes. The safeguarding of the Stubbington Bypass route is supported.

There also appears to be a proposed improvement on the DFLP Policies Map at the Delme Roundabout (A27) but this is not mentioned in the Plan itself. Therefore clarification is sought on this proposal.

The DFLP also aims to encourage sustainable and active travel modes (Policy INF2) which is supported. This issue has become particularly important for FBC due to the requirements associated with the Air Quality Management Areas (AQMAs) associated with the northern end of Newgate Lane and Gosport Road, and Portland Street.

Consequently development will be required to support the use of alternative vehicle types and fuels such as the installation of Electric Vehicle charging equipment in residential properties and communal parking area.

## **Other policies**

### *Retail*

The Fareham Local Plan does not allocate any additional retail floorspace as it acknowledges that its Town Centre has seen a significant increase in vacant retail floorspace from 5,345 m<sup>2</sup> to 10,234m<sup>2</sup> between 2016 and 2017 (representing an increased vacancy rate from 6% to 11%). Its evidence suggests there will be a requirement beyond 2026 but it has been decided to consider this when the Plan is next reviewed, recognising that the Government is proposing a requirement to review Local Plans every five years.<sup>3</sup>

Proposals relating to out-of-town shopping areas such as Speedfields Park (Newgate Lane) will be subject to Policy R4 which requires an impact assessment in accordance with the NPPF for proposals of 500sq.m or over (both new units or extensions) in order to demonstrate that there is no significant adverse effect on the vitality and viability of existing or proposed centres. This approach is supported.

### *Community Facilities and Open Space*

It is noted that the Plan includes a number of policies relating to community facilities and open space which seek to retain and improve existing facilities.

### *Natural Environment*

The Plan includes a series of policies relating to biodiversity including commitment to the Solent Recreation Mitigation Partnership, of which GBC is also a partner. It also includes provision relating to coastal flood risk management including the provisions of the River Hamble to Portchester Coastal Strategy prepared by the East Solent Coastal Partnership.

### *Design*

The Plan includes a number of design and heritage policies which aim to protect the local distinctiveness of the landscape and built environment, and create a sense of place.

Policy D4 aims to coordinate development and states where proposals come forward that are part of a wider development site, supporting information will be expected to demonstrate that the proposal will not prejudice the development of the adjoining site and that the proposal maximises place-making opportunities. It adds that development proposals will not be permitted that: prevent or limit the potential for developing an adjoining site; or which do not maximise connectivity and permeability opportunities; or address mitigation needs relating to the wider development potential.

The aims of Policy D4 are supported and may be applicable with regard to the development of sites such as Daedalus.

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<sup>3</sup> As proposed in the Government's Housing White Paper - Fixing our broken housing market (Feb 2017)

**Concluding remarks**

In the light of the above comments it would be useful if we could meet with you to discuss these issues further. In the meantime if you require any clarification on these matters please do not hesitate to contact me or Jayson Grygiel, the Deputy Head of Planning Services (Policy) for further assistance.

Yours sincerely

  
**Head of Planning Services**