

SECTION 78 APPEAL

APPELLANT'S STATEMENT OF CASE

OUTLINE PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT

LAND AT NEWGATE LANE (SOUTH), FAREHAM

ON BEHALF OF BARGATE HOMES LIMITED

LPA Ref: P/19/0460/OA

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1.0 Introduction and Appeal Background

1.1 This Statement of Case has been prepared to support an appeal against the failure of Fareham Borough Council (the Council) to determine planning application P/19/0460/OA within the prescribed time period.

1.2 The application was submitted to the Council on 26th April 2019 by Pegasus Group acting as agent for the appellant, Bargate Homes Limited. The application was confirmed as valid on 29th April 2019, and had an initial determination deadline of 24th June 2019. The appellant agreed to extend the determination period on several occasions, the last of which ran until 31st March 2020.

1.3 The description of development is:

"Outline Planning Permission for the demolition of existing buildings and development of up to 115 dwellings, open space, vehicular access point from Newgate Lane and associated and ancillary infrastructure, with all matters except access to be reserved."

1.4 The appeal site, known as Land at Newgate Lane, South is located immediately adjacent to the site known as Land at Newgate Lane, North, which is also the subject of an appeal against non-determination (planning application P/18/1118/OA). This application proposes up to a further 75 dwellings.

1.5 The two sites are adjacent to one another, and form a single parcel of land situated between the original Newgate Lane to the west and the newly constructed relief road known as Newgate Lane East to the east. Although the planning applications were made separately to the LPA (and therefore must be submitted as separate appeals), the proposals have always been conceived as a cohesive development, with the project team responsible for the applications and the two developers working collaboratively.

1.6 The appellants are therefore requesting that the two appeals be linked, to be heard together at inquiry. Justification to support our request for an inquiry is

contained within the covering letter.

- 1.7 Prior to the planning application being submitted, the applicant undertook pre-application consultation with the Council, local Councillors and local residents, including holding a public exhibition. Full details of the pre-application consultation undertaken are provided in the Statement of Community Involvement and Planning Statement submitted alongside both of the planning applications.
- 1.8 Despite extensive negotiations with the Council during the course of the determination period, which resulted in the submission of amended plans and further supporting evidence, the Council has not determined the application within the prescribed time period.
- 1.9 A list detailing the application submissions and its subsequent amendments is contained in Appendix 1.

APPENDIX 1: PLANNING APPLICATIONS DOCUMENTS LIST

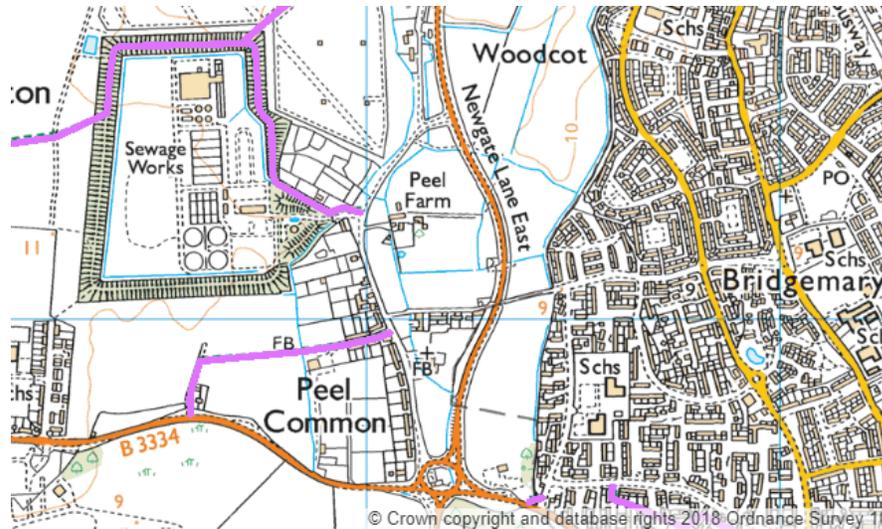
- 1.10 On a procedural point it should be noted that additional highways plans were submitted to the LPA on 21st April 2020 following a productive meeting with Hampshire County Council Highways, but that these were not formally accepted by the LPA. These are listed in appendix 1, and we invite the Inspector to consider these in her or his decision.
- 1.11 This Statement of Case should be read in conjunction with the draft Statement of Common Ground also submitted with the appeal.

2.0 The Appeal Site and Surroundings

The Site

- 2.1 The appeal site comprises 6.1 hectares of agricultural land, bounded by Newgate Lane to the west; the site known as Land at Newgate Lane, North to the north; Newgate Lane East to the east; and Woodcote Lane to the south. The land is classified as grade 3a and grade 3b agricultural land.
- 2.2 It comprises a three fields used for agriculture, together with a further strip of land to the western side of the site separated by the River Alver. The site boundaries are made up of hedgerows and mature trees.
- 2.3 In between the two appeal sites lies Hambrook Lodge, which is accessed from Newgate Lane. Hambrook Lodge and its demise is not included in the red line boundary for either site and will be retained.
- 2.4 The appeal site contains 3 no. existing disused agricultural buildings to the east of Hambrook Lodge. Further assessment of these buildings is contained within the Heritage Assessment submitted with the application.
- 2.5 The appeal site is located outside the defined settlement boundary identified in the Local Plan policies map, in a 'Strategic Gap' known as the Fareham/Gosport to Stubbington/Lee on Solent Gap (or simply the Fareham – Stubbington Gap).
- 2.6 It is not subject to specific statutory or non-statutory landscape related planning designations.
- 2.7 Recent surveys (Autumn 2019) have established the presence of chamomile and other plant species to the west of the River Alver, indicating that these areas would likely meet the criteria of a lowland meadow (which is a UK BAP Priority Habitat).
- 2.8 The appeal site is partly covered by an area identified as 'low value' for Brent Geese.
- 2.9 The appeal site is located principally in Flood Zone 1, with small areas to the

- west of the River Alver falling within Flood Zones 2/3. The River Alver flows in a southerly direction through the western part of the site and is classified as a 'Main River' by the Environment Agency.
- 2.10 Overhead electricity cables transect the site diagonally running in a north-west to south-east direction.
- 2.11 Carriston Cottage (Grade II listed) lies 50m west of the site on the western side of Newgate Lane. Foxbury Cottages and Farmhouse (Grade II listed) lie approximately 300m to the north.
- 2.12 Peel Common Wastewater Treatment Works is located approximately 200m to the west of the site.
- 2.13 There are no Public Rights of Way over the site. Those in its vicinity are shown on the plan below; namely PROW 71b, which provides a link to Tips Copse from Newgate Lane immediately west of the site via the Wastewater Treatment Works, and Footpath 71c, which provides a link from to Gosport Road via Albert Road.



Local Surroundings

- 2.14 The site is located 200m from the settlement of Bridgemary (which falls within the local authority area of Gosport), approximately 1km from the settlement of Stubbington and approximately 3km from Fareham Town Centre. Fareham is a large market-town of approximately 45,000 residents which grew rapidly

in the 1960s to provide additional housing as an alternative to the urban centres of Southampton and Portsmouth, along with other conurbations along the M27 corridor. Gosport is around 5kms to the south.

- 2.15 The Newgate Lane 'relief road' (ref. P/15/0717/CC), now known as Newgate Lane East is situated immediately east of the site and was completed in August 2018. The relief road diverts traffic travelling between Fareham and Gosport on a new section of road located closer to Bridgemary through the existing Strategic Gap. The existing Newgate Lane, which is immediately west of the site, continues to provide vehicular access to properties via a new priority right turn lane ghost island junction, but through-traffic is restricted at Peel Common Roundabout (except pedestrians and cyclists).
- 2.16 The site is close to Portsmouth Harbour which connects to Fareham via the River Wallington. The appeal site is also within easy reach of the beach at Lee-on-Solent and numerous public open spaces.
- 2.17 The surrounding countryside and waters are subject to various ecological designations. The table below lists the statutory and non-statutory designated sites of ecological value within 5km of the appeal site.

Site	International Designation	National Designation	Local/Sub-Local Designation
Portsmouth Harbour	SPA, Ramsar	SSSI	
Solent and Southampton Water	SPA, Ramsar	SSSI	
Titchfield Haven		SSSI, NNR	LNR
Browdown		SSSI	
The Wild Grounds		SSSI	LNR
West of River Alver			LNR
Lee on Solent Golf Course			SINC
Tips Copse			SINC
Fort Fareham			SINC
Seafield/Salterns Park			SINC

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- 2.18 The Portsmouth Harbour SPA and Solent and Southampton Water SPA comprise the Bird Aware Solent Region.
- 2.19 The accessibility of the site to local services is described in detail in Section 3 below.

3.0 Sustainability

Convenience Shopping and Retail

- 3.1 Local services within Bridgemary include convenience stores, a pub, take-away and places of worship, with a local centre on Carisbrooke Road.
- 3.2 Speedfields Retail Park on Newgate Lane includes Asda and Lidl supermarkets, and a number of other retail stores, fast food outlets and coffee shops.
- 3.3 A range of higher order comparison shops are located in Fareham approximately 3km north.

Health and Education

- 3.4 A selection of GPs surgeries and dentists are located in Bridgemary and Stubbington. Bridgemary Medical Centre and The Stubbington Medical Practice are both accepting new patients. The nearest general hospitals are Fareham Community and Queen Alexandra which are 10km and 15km by road respectively.
- 3.5 The nearest primary school is Peel Common (infant with nursery and junior) approximately 250m south-east of the site, Woodcote and Holbrook Primaries are both approximately 800m to the east in Bridgemary. The LPA has also advised that the site is within the catchment area of Crofton Anne Dale (infants and juniors) in Stubbington.
- 3.6 Crofton and Bridgemary are the nearest secondary schools, both of which are within 1km of the site.
- 3.7 Fareham College and CEMAST provide further education opportunities locally.

Leisure and Open Space

- 3.8 Council leisure centres are located in Fareham and south of Bridgemary.
- 3.9 The site is within walking distance of public open spaces including HMS Collingwood playing fields, Brooker's Field Recreation Ground and the Alver Valley Country Park. Lee-on-the-Solent Golf Club is also within walking

distance.

- 3.10 Further afield the site is located within 10km of Titchfield Haven National Nature Reserve to the west and the South Downs National Park to the north which provide access to strategic open spaces.

Employment

- 3.11 There are a significant number of employment opportunities within Fareham and Gosport town centres.
- 3.12 Since the 2015 Daedalus Vision, 650 jobs have been created through the growth of the Solent Airport and Faraday Business Park. The Draft Local Plan (2017 version) allocates Daedalus airfield between Stubbington and Lee-on-the-Solent as a strategic development location for up to a further 98,000 sqm of B1c, B2 and B8 uses, an employment hub and associated infrastructure to support which will generate increased demand for skilled labour.
- 3.13 The CEMAST college was completed on the site in 2014 and provides a complementary facility for construction skills training and the IFA2 electrical interconnector facility which was granted permission by the Council in 2017.

Public Transport

- 3.14 The site is served by bus routes 21 and 21A between Stubbington and Fareham, which stop on the new bus stops on Newgate Lane East located within 250m (straight line distance) from the site, and together provide a roughly hourly service from approximately 0700 to 1900 hours Monday to Friday and 0900 to 1400 hours on a Saturday. The routes 9 and 9A stopping at the Carisbrooke Road shops also provide a connection to Gosport.
- 3.15 Fareham station has regular services to London Waterloo, London Victoria (via Gatwick Airport), Brighton, Portsmouth Harbour, and Southampton Central. There is also a roughly half hourly service to Portchester, Cosham, Hilsea, Fratton & Portsmouth and Southsea throughout the day from approximately 06:00 till 23:30.
- 3.16 A detailed facilities plan is contained within the Design and Access Statements submitted to support the application.

4.0 The Appeal Proposals

4.1 The proposed development at Newgate Lane (south) is for:

"Outline Planning Permission for the demolition of existing buildings and development of up to 115 dwellings, open space, vehicular access point from Newgate Lane and associated and ancillary infrastructure, with all matters except access to be reserved."

4.2 The key features of the proposal are:

- Demolition of existing vacant farm buildings;
- Up to 115 dwellings across a range of housing types and sizes (to be determined at the reserved matters stage);
- 40% affordable housing provision;
- Vehicular access from Newgate Lane;
- Pedestrian links to the Land at Newgate Lane, North appeal site and Woodcote Lane;
- Retention of existing trees and hedgerows;
- Landscaping and open space;
- Ecological enhancements;
- Children's play area; and
- Acoustic buffer from the new bypass.

4.3 The application was supported by a series of parameter plans which will govern the principles of the proposal and an Illustrative Masterplan.

4.4 The layout and design of the dwellings together with the associated infrastructure (including estate roads, car parking, incidental landscaping, and drainage and utilities services) will be determined at the reserved matters stage.

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- 4.5 Hambrook Lodge and its demise are not included within the appeal site. The access driveway to Hambrook Lodge will be retained as part of the proposals and the right of access enjoyed by the owners will not be compromised by the proposals. As noted above, the appeal site does however contain disused agricultural buildings to be demolished.

5.0 Planning Policy

5.1 In this section the national and local planning policy and guidance pertinent to the application site and development proposals is summarised. The plan-led approach to development, as set out by Section 38 (6) of the Planning and Compulsory Purchase Act 2004, requires development proposals to accord with the adopted Development Plan unless material considerations indicate otherwise.

The Development Plan

5.2 The adopted Development Plan for Fareham Borough consists of three main documents:

- Local Plan Part 1: 'Core Strategy' (Adopted in August 2011);
- Local Plan Part 2: 'Development Sites & Policies' (DSP) (Adopted in June 2015); and
- Local Plan Part 3: The 'Welborne Plan' (Adopted in June 2015).

5.3 The Core Strategy contains the strategic policies and the DSP contains the development control policies against which this application is assessed. The Welborne Plan deals specifically with the development of the new garden village and is not pertinent to this application.

5.4 The following sections sets out the Core Strategy and DSP policies pertinent to the proposals.

Core Strategy

5.5 **Policy CS2 'Housing Provision'** establishes the housing land supply sources to meet the OAN of 3,729 between 2006 and 2026 (excluding Welbourne), which includes allocated sites and brownfield land. The supply of sites will be kept up to date through a regular review of the Strategic Housing Land Availability Assessment (SHLAA) and allocated through Part 2 of the Plan.

5.6 **Policy CS4 'Green Infrastructure, Biodiversity and Geological Conservation'** affords protection to important habitats within the Borough including Sites of Special Scientific Interest, Sites of Importance for Nature

Conservation, areas of woodland, and the coast and trees will be protected in accordance with the hierarchy of nature conservation designations. In order to prevent adverse effects upon sensitive European sites in and around the Borough, the Council will work with other local authorities (including the Partnership for Urban South Hampshire) to develop and implement a strategic approach to protecting European sites from recreational pressure and development.

5.7 **Policy CS5 'Transport Strategy and Infrastructure'** promotes the achievement of sustainable integrated transport systems for the Borough including the safeguarding of land for identified works; development will not be permitted where this is prejudicial to the implementation of these schemes. The Council will permit development which does not adversely affect the operation of the local network and is designed and implemented to encourage sustainable travel. Development proposals which generate a high demand for travel should be located in accessible areas.

5.8 **Policy CS6 'The Development Strategy'** provides that development will be focused in the following locations:

- Fareham;
- Fareham Town Centre;
- Western Wards and Whiteley;
- Portchester;
- Stubbington & Hill Head and Titchfield;
- Welbourne; and
- The Strategic Development Allocations at Coldeast Hospital and Daedalus Airfield.

5.9 It states:

"In identifying land for development, the priority will be for the reuse of previously developed land, within the defined urban settlement boundaries including their review through the Site Allocations and Development

Management DPD, taking into consideration biodiversity / potential community value, the character, accessibility, infrastructure and services of the settlement and impacts on both the historic and natural environment. Opportunities will be taken to achieve environmental enhancement where possible. Development which would have an adverse effect on the integrity of protected European conservation sites which cannot be avoided or adequately mitigated will not be permitted..."

5.10 **Policy CS14 'Development on land outside settlements'** states that

"Built development on land outside the defined settlements will be strictly controlled to protect the countryside and coastline from development which would adversely affect its landscape character, appearance and function. Acceptable forms of development will include that essential for agriculture, forestry, horticulture and required infrastructure. The conversion of existing buildings will be favoured. Replacement buildings must reduce the impact of development and be grouped with other existing buildings, where possible. In coastal locations, development should not have an adverse impact on the special character of the coast when viewed from the land or water."

5.11 **Policy CS15 'Sustainable Development and Climate Change'** provides that the Council will seek to secure development in locations which are sustainable and where there will be a minimum negative environmental impact. Development should:

- make efficient use of land;
- seek to properly manage flood risk and waste impacts; and
- meet Code for Sustainable Homes Level 6.

5.12 **Policy CS16 'Natural Resources and Renewable Energy'** requires developers to demonstrate best practice in respect of energy and water efficiency, reduction of carbon emissions and implementation of the waste hierarchy to protect natural resources. Loss of best and most versatile agricultural land should be resisted. Development (of more than 1 dwelling or more than 500 sqm of non-residential floorspace) will be encouraged to contribute to the Fareham target of 12MW of renewable energy by 2020.

- 5.13 **Policy CS17 'High Quality Design'** sets out a series of design criteria for new development including the requirement to respond positively to the surrounding environment in terms of scale, form and character, and to promote permeability, legibility, open space and a distinct identity of place. In addition, new housing will be required to: secure adequate internal and external space, dwelling mix, privacy, and sunlight and daylight to meet the requirements of future occupiers.
- 5.14 **Policy CS18 'Provision of Affordable Housing'** provides that on sites of 15 or more dwellings, developers will be expected to provide 40% affordable units unless a lack of viability can be clearly demonstrated.
- 5.15 **Policy CS20 'Infrastructure and Development Contributions'** requires development to provide or contribute towards infrastructure and any necessary mitigation measures through conditions, legal agreement and/or CIL.
- 5.16 **CS21 'Protection and Provision of Open Space'** safeguards the network of open and green spaces for recreation and wildlife value. New development must provide open space in accordance with the Council's standards.
- 5.17 **Policy CS22 'Development in Strategic Gaps'** provides that land within Strategic Gaps will be treated as countryside, and proposals will not be permitted either individually or cumulatively where they significantly affect the integrity of the gap. Strategic Gaps have been identified between Fareham/Stubbington and Western Wards/Whiteley (the Meon gap); and Stubbington/Lee on Solent and Fareham/Gosport.
- 5.18 This policy is concerned with maintaining the settlement pattern and the local landscape character rather than any inferring any landscape value per se:
- "Strategic gaps do not have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. Continuing pressure for high levels of development mean that maintaining gaps continues to be justified." (paragraph 6.52)*

5.19 The policy wording states that boundaries of strategic gaps will be reviewed in accordance with the following criteria:

"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."

5.20 This commitment to review the boundaries of the strategic gaps was added following the comments in the Inspector's Examination Report on the Core Strategy, which highlighted the need to provide robust justification to meet legal and statutory requirements. At paragraph 47 the Inspector writes:

"Concern has been raised by a number of representors that policy CS22's protection of strategic gaps lacks adequate justification – particularly in view of the restrictive approach to development outside settlements set out in policy CS14. Nevertheless, given the built-up nature of much of Fareham Borough and noting that some of the Borough's constituent settlements are separated by relatively narrow open gaps, I accept the Council's argument that the broad identification of strategic gaps in the Core Strategy can play a useful role in guiding its intended review of settlement boundaries. Furthermore, and with reference to the Government's localism agenda, it is clear that there is strong local support for preventing coalescence between identified settlements. In principle therefore, the policy is adequately justified – although the detailed boundaries of the gaps themselves remain to be reviewed in the SADM DPD. The Council accepts that policy CS22 could provide clearer guidance for that review, and suggests that criteria be added in line with the PUSH Policy Framework for Gaps13 [6.8]. I endorse this change for soundness reasons."

**APPENDIX 2: INSPECTOR'S EXAMINATION REPORT TO THE CORE
STRATEGY 2011**

- 5.21 Paragraph 6.53 of the policy's supporting text goes on to provide that a review of the detailed gap boundaries will be undertaken as part of the DSP to identify the land essential to perform this role and that which cannot be protected by other designations.
- 5.22 This exercise was reported in the LPA's 'Review of Gap Policy Designations' document, published in October 2012. The report considers the role of the gaps in respect of three assessment criteria, namely physical and visual separation, settlement character and landscape sensitivity, and green infrastructure value, and, for Fareham-Stubbington, concludes that it continues to provide a function which cannot be fulfilled by other policies. For this reason, the Fareham to Stubbington gap remains unchanged in the DSP.

APPENDIX 3: REVIEW OF GAP POLICY DESIGNATIONS REPORT, 2012

Development Sites and Policies (DSP)

- 5.23 **DSP1 'Sustainable Development'** reflects the presumption in favour of sustainable development as set out in the NPPF. The Council will always work proactively with applicants to find solutions that enable proposals to be granted permission wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- 5.24 **DSP2 'Environmental Impact'** states that development proposals should not, individually or cumulatively, have a significant adverse impact on neighbouring development or the wider environment in terms of noise, air or other pollutants. Proposals should have a satisfactory arrangement for the management of waste and protection of water resources.
- 5.25 **DSP3 'Impact on Living Conditions'** requires the protection of neighbouring residential amenity, sunlight, daylight and privacy.
- 5.26 **DSP4 'Prejudice to Adjacent Land'** states:
- "Where piecemeal development could delay or prevent the comprehensive development of a larger site, a legal agreement will be sought, to ensure that any permitted development does not prejudice the development of adjacent land and that highway access, pedestrian access and services to adjoining land are provided."*

- 5.27 **DSP5 'Protecting and Enhancing the Historic Environment'** sets out the Council's position on the conservation of designated and non-designated heritage assets. Great weight will be given to the conservation of designated assets and harm or loss will require clear and convincing justification. Non-designated heritage assets including locally listed buildings, historic parks and gardens, and sites of archaeological importance will be protected from development that would unacceptably harm their Architectural and historic interest, and/or setting taking account of their significance.
- 5.28 **DSP6 'New Residential Development Outside of the Defined Urban Boundaries'** reinforces the Core Strategy's objective to restrict development outside existing settlements, unless specific circumstances apply. It states:
- "New buildings should be well-designed to respect the character of the area and, where possible, should be grouped with existing buildings."*
- 5.29 **DSP13 'Nature Conservation'** provides that development is permitted where designated sites and protected/priority species are protected, and where appropriate enhanced. Proposals resulting in detrimental impacts to these sites or species shall only be granted where impacts are outweighed by the needs for/benefits of the development; and adverse impacts can be appropriately mitigated or compensated.
- 5.30 **DSP14 'Supporting Sites for Brent Geese and Waders'** states that proposals resulting in 'in combination' effects of recreation on the Special Protection Areas can be satisfactorily mitigated through the provision of an appropriate avoidance and/or mitigation measures. Applications resulting in a 'direct effect' may be subject to Appropriate Assessment.
- 5.31 **DSP15 'Recreational Disturbance on the Solent Special Protection Areas (SPA)'** states that proposals resulting in 'in combination' effects of recreation on the Special Protection Areas can be satisfactorily mitigated through the provision of a financial contribution that is consistent with the approach being taken through the Solent Recreation Mitigation Strategy. Applications resulting in a 'direct effect' may be subject to Appropriate Assessment.

5.32 **DSP40 'Housing Allocations'** sets out the allocated sites for housing on the policies map. In addition, where it can be demonstrated that the Council does not have a five-year supply of land for housing against the requirements of the Core Strategy (excluding Welborne) additional housing sites, outside the urban area boundary, may be permitted where they meet all of the following criteria:

"i. The proposal is relative in scale to the demonstrated 5-year housing land supply shortfall;

ii. The proposal is sustainably located adjacent to, and well related to, the existing urban settlement boundaries, and can be well integrated with the neighbouring settlement;

iii. The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps;

iv. It can be demonstrated that the proposal is deliverable in the short term; and;

v. The proposal would not have any unacceptable environmental, amenity or traffic implications."

Material Considerations

Habitats Regulations Assessment (HRA)

5.33 The Local Planning Authority is required to undertake an HRA where proposed plans or projects relate to conservation sites which have been selected and designated on scientific criteria under European law to protect certain species and habitats. These include SPAs which are sites classified in accordance with Article 4 of the EC Directive 2009/147/EC on the conservation of wild birds for certain rare and vulnerable birds, and for regularly occurring migratory species.

5.34 The HRA comprises several distinct stages. The first stage of the HRA process includes formally screening a proposed plan or project to decide whether it is likely to have a significant effect on a European designated site. If, at the screening stage, any significant effects of a plan or project on a SPA or SAC (alone or in combination with other plans or projects) can be excluded, then

the plan or project can be “screened out” and no further assessment is required. However, where any significant effect of a plan or project on a SPA or SAC (alone or in combination with other plans or projects) cannot be excluded, then the competent authority will be required to assess the effects in more detail through an appropriate assessment, to ascertain whether an adverse effect on the integrity of any SPA or SAC can be ruled out.

Other Considerations

5.35 Other material considerations of relevance to this proposal include:

- The emerging Local Plan (discussed in Section 6);
- The National Planning Policy Framework (discussed in Section 7);
- Fareham Borough Council Supplementary Planning Guidance, including:
 - Affordable Housing SPD;
 - Design Guidance SPD; and
 - Planning Obligations SPD.
- Solent Waders and Brent Goose Strategy, March 2018 (produced by the SWBGS Steering Group);
- Solent Recreation Mitigation Definitive Strategy, April 2018; and
- Natural England Nitrates Guidance, March 2020.

6.0 Emerging Local Plan

6.1 As set out above, the LPA is currently preparing a new Local Plan.

6.2 Paragraphs 48-50 of the NPPF explain the weight which can be given to emerging policies. It is expressly clear that the refusal of planning permission on grounds of prematurity will seldom be justified where a plan has yet to be submitted for examination, and only then when both the following circumstances apply:

" a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and

b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area." (Paragraph 49).

6.3 The emerging Local Plan comprises:

- Draft Local Plan, December 2017;
- Issues and Options, July 2019; and
- Supplement to the draft Local Plan, January 2020.

6.4 The emerging Local Plan (which at the time of writing has not yet been consolidated into a single document), sets out the overarching spatial strategy and recognises the need to identify land for development in the Strategic Gap in order for Fareham to meet its Housing Requirement. It does not however propose to allocate the appeal site or otherwise extend the settlement boundaries to include it.

6.5 Rather, the development proposed within the gap comprises one, the allocation of the "HA2 site" for up to 475 dwellings on its eastern boundary, and two, the establishment of a Strategic Growth Area on the western side, as shown on Figure 3.2 of the Supplement document reproduced below.



Figure 3.2. Proposed Strategic Growth Area: South of Fareham

6.6 Neither development area is the subject of an agreed masterplan or access arrangements. It is understood that the promoters of the HA2 allocation have proposed a roundabout on Newgate Lane East to provide access but that concerns have been expressed by Hampshire County Council Highways.

6.7 The relevant emerging policies to the consideration of the appeals are:

- Policy SP1 'Presumption in Favour of Sustainable Development';
- Policy SP5 'Development in the Countryside';
- Policy SP6 'Development in Strategic Gaps';
- Policy XX (currently un-numbered) 'Five-Year Housing Land Supply';
- Policy XX (currently un-numbered) 'Strategic Growth Areas'; and
- Policy DA1 'Development Allocations'.

7.0 Planning Policy Framework and The Presumption in Favour of Sustainable Development

7.1 The Housing White Paper 'Fixing our Broken Housing Market', published in February 2017, set out the Government's plan for tackling the housing crisis by planning for "the right homes in the right places". It placed great emphasis on the need to plan for and deliver homes much more quickly and identified issues around the robustness of the current '5-year housing land supply' mechanism, due to inconsistencies in both the OAN and supply methodologies.

7.2 In response to the White Paper, the National Planning Policy Framework (NPPF) was revised in July 2018 and again in February 2019.

7.3 The NPPF continues to be an important vehicle to assist the government's target to deliver 300,000 net additional homes a year (The Single Departmental Plan, updated 23 May 2018). **Paragraph 59** asserts:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

7.4 The NPPF is clear that the purpose of the planning system is to contribute to sustainable development. Sustainable development is summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs, and should achieve net gains for economic, social and environmental objectives.

7.5 The application of the 'presumption in favour of sustainable development is explained in **paragraph 11**. For decision-taking this means:

*"approving development proposals that accord with an up-to-date development plan without delay [**"the straight balance"**];*

or

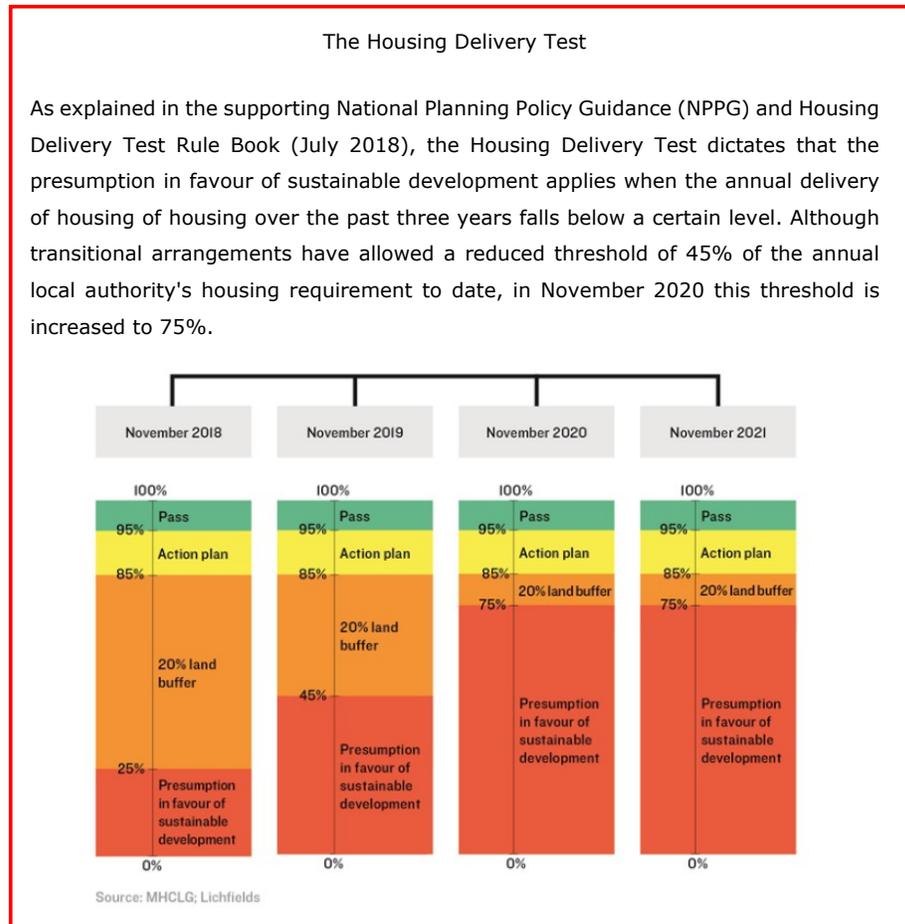
where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting

permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole **["the tilted balance"]**." [My annotations]

7.6 The circumstances in which policies are deemed 'out of date' is confirmed in footnote 7, which include (but are not limited to), for applications involving the provision of housing, where an LPA cannot demonstrate a five-year supply of deliverable housing sites OR the Housing Delivery Test cannot be met.



Restrictive Policies

7.7 The circumstances in which policies in the NPPF 'provide clear reason for refusing' a proposed development (such that the presumption does not apply) are confirmed in footnote 6, as follows:

"The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 176) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 63); and areas at risk of flooding or coastal change."

7.8 Specifically, in respect of impacts on local habitat sites, Paragraph 177 confirms that the presumption in favour of sustainable development does not apply where *"the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site."*

7.9 In sum, I have identified a clear route to the 'tilted balance' whereby (unless the restrictive policies of footnote 6 apply) the policies which are most important for determining the application are deemed out of date in the event that LPA cannot demonstrate a five-year supply of deliverable housing sites or the Housing Delivery Test cannot be met.

7.10 Other sections of the NPPF relevant to the appeal proposals are:

- Chapter 8: Promoting healthy and safe communities;
- Chapter 9: Promoting sustainable transport;
- Chapter 11: Making effective use of land;
- Chapter 12: Achieving well designed places;
- Chapter 14: Meeting the challenge of climate change, flooding and coastal change;

-
- Chapter 15: Conserving and enhancing the natural environment;
 - Chapter 16: Conserving and enhancing the natural environment; and
 - Chapter 17: Facilitating the sustainable use of minerals.

8.0 Housing Need and Supply

Housing Need

8.1 The Core Strategy (August 2011) establishes the housing requirement for Fareham Borough as 3,729 dwellings between 2006-2026, excluding additional housing to be provided at the Strategic Development Area of Welborne.

8.2 However, given the length of time since the adoption of the Core Strategy exceeds 5 years and the housing need has changed significantly, under the provisions of paragraph 33 of the NPPF, the housing requirement is out-of-date. In such circumstances, National Planning Policy Guidance (NPPG) dictates that the 'standard method' for calculating housing need applies.

8.3 The 'Standard Method' is described in the NPPG (Paragraph: 006 Reference ID: 2a-006-20190220). In brief, Local Housing Need should be calculated using a three-step process:

- Set the baseline using 2014-based household projections;
- Adjust to take account of affordability;
- Cap the level of any increase.

8.4 Paragraph 73 of the NPPF makes clear that appropriate buffer should then be applied as follows:

- 5% to ensure choice and competition in the market for land; or
- 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply (to be applied where the annual delivery of housing over the past three years falls below 75% of the annual local authority's housing requirement).

8.5 The LPA's current five-year housing requirement based on the most recent

published projections and Housing Delivery Test results is set out in the table below.

Five-Year Housing Requirement (as of April 2020)

Local Housing Need (dwellings per annum)	523
Local Housing Need x 5 years	2,613
5 % Buffer	130
Total 5 Year Requirement	2,743

- 8.6 This is slightly greater than the requirement for 2,730 homes identified in the Council's Five-Year Housing Land Supply Position Statement (see below) owing to the new affordability information.

Housing Supply

- 8.7 The most recently published Five-Year Housing Land Supply Position Statement is dated April 2019, which asserts a deliverable supply of 2,544 homes or a 4.66-year supply.

- 8.8 The committee report for planning application P/19/0915/FP for the provision of dwellings on Stubbington Lane presented to committee on 18th March 2020 makes the following concession:

"Members will note from the 'Five Year Housing Land Supply Position' report considered at the April 2019 Planning Committee that this Council currently has a housing land supply of 4.66 years. During the latter part of 2019 several appeal decisions were received in which Planning Inspector's considered the Council's 5YHLS position, including the appeal by Miller Homes on land at Winnham Farm (appeal reference: APP/A1720/W/19/3230015). In that appeal decision the Inspector was of a view that the Council's claimed supply figure of 4.66 years was too optimistic, and that the appellant's figure of 2.4 years better represented the situation at the time."

-
- 8.9 The position of the appellant, however, is that, at the time of writing, the deliverable supply is 711 homes or 1.3 years. This figure will be robustly justified in the appellant's appeal evidence.
- 8.10 The difference in the parties' figures relates principally to the inclusion of sites within the LPAs trajectory which do not meet the NPPG definition of deliverable or cannot be delivered within the timeframe specified. Other factors include the ongoing 'nitrates' issue in relation to the impact of development on the Solent SPA, which is stalling the grant of planning consents.
- 8.11 Following the announcement of the Budget in March 2020, the Ministry for Housing, Communities and Local Government (MHCLG) published a policy document, 'Planning for the Future'. It said ministers will review the formula for calculating local housing need with the aim of promoting greater building in urban areas. We consider that the LPA's housing supply position may worsen in the short term as a result of the new methodology to be employed by MCHLG.

Housing Delivery

- 8.12 The latest results of the Housing Delivery Test were published in February 2020.
- 8.13 The Housing Delivery Test results indicate that 99% of the number of homes required have been delivered in the period 2016 to 2019 such that there is not a record of significant under-delivery and it is therefore appropriate to apply a 5% buffer. The Housing Delivery Test is therefore 'passed'.
- 8.14 However, the Housing Delivery Test results for the period 2017-2020 are due to be published in November 2020 and this will determine the buffer to be applied from that date onwards.
- 8.15 It is anticipated that the Housing Delivery Test results of 2020 will identify that only 71% of the number of homes required will have been delivered. This is because:

- Over the period 2017-2019, the Housing Delivery Test results 2019 identify that there were 581 completions. The Council's trajectory indicates that an additional 263 completions will be achieved in 2019/20 providing a **total delivery of 844 homes in the period 2017-2020.**
- Over the period 2017-2019, the Housing Delivery Test results 2019 identify that there was a need for 674 homes. As identified previously, from 1st April 2019 the standard method identifies that there is a minimum local housing need for 523 homes in 2019/20. This provides for a **total need for 1,197 homes in the period 2017-2020.**

8.16 This figure of 71% is below the 75% threshold to pass the Housing Delivery Test (from November 2020) and therefore the policies which are most important for determining applications will be automatically out-of-date regardless of the five-year land supply position according to Footnote 7 of the NPPF.

8.17 This would also amount to a record of significant under-delivery which requires then application of a 20% buffer from November 2020, thus worsening the housing land supply position.

8.18 The Housing Land Supply Report provides further assessment of the Council's housing land supply, which will be expanded upon in our evidence.

APPENDIX 4: HOUSING LAND SUPPLY REPORT

9.0 Main Matters

Background

9.1 As an appeal against non-determination in advance of the application determination at committee, the applicant does not have the benefit of knowledge of the recommended reasons for refusal. Email correspondence from the Planning Officer dated 24th March 2020 however indicates the anticipated themes of the recommended reasons for refusal as being in relation to:

- Principle of development/design/landscape matters;
- Highways;
- On-site ecology (chamomile and lowland meadow); and
- Demonstrating nitrate neutrality through the Appropriate Assessment process.

APPENDIX 5: EMAIL FROM PLANNING OFFICER DATED 24/03/2020

9.2 The matters in dispute relate to whether the appeal sites represent an appropriate location for residential development, and whether the proposals would adequately address their impact in respect of local landscape, the highways network and ecology.

9.3 In the absence of a five-year housing land supply, paragraph 11 of the NPPF is engaged and the test is therefore whether any adverse impacts would significantly and demonstrably outweigh the benefits of the scheme.

9.4 It is this planning balance which is key to the determination of this appeal when considering, as a whole, the economic, social and environmental impacts of the proposals.

9.5 However, we maintain our position, that regardless of the Council's five-year land supply position, the appeal scheme represents sustainable development

which when assessed against the Development Plan and relevant material considerations in accordance with s.38(6) should be approved without delay.

The Presumption in Favour of Sustainable Development

- 9.6 As outlined above, paragraph 11 of the NPPF is clear that the presumption in favour of sustainable development will apply under the 'tilted balance' where the policies which are more important for determining the application are out-of-date.
- 9.7 I have identified above that the policies which are most important for determining the application are deemed out of date in the event that the LPA cannot demonstrate a five-year supply of deliverable housing sites or the Housing Delivery Test cannot be met. The LPA cannot demonstrate a five-year supply of land for housing.
- 9.8 The application of the presumption is not restricted by any of the policies listed in footnote 6 of the NPPF, because the appeal site is not located within any of the designations listed, nor do the proposals result in any significant effects on any habitat sites alone or in combination with any other plans or projects.
- 9.9 Therefore, the titled balance applies, and permission should be granted, *unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.*
- 9.10 Whilst the parties agree that it cannot demonstrate a five-year housing land supply, the extent of that undersupply is at issue.
- 9.11 The appellant's evidence will provide a robust assessment of the sites in the LPA's trajectory which informs its current position that the supply is 1.3 years, compared with the latest position of the LPA which is 4.66 years. We assert that the LPA's figure is flawed, because it fails to apply the national planning policy guidance in respect of the definition of 'deliverable' sites.
- 9.12 This position may worsen in the short-medium term as a result of the new methodology to be employed by MCHLG and the updated Housing Delivery Test results.

- 9.13 It is our view that the shortfall identified by the appellant is substantial, and that the provision of up to 115 new homes should be given substantial weight in the planning balance accordingly.
- 9.14 In establishing which policies are to be considered out-of-date under the titled balance, Paragraph 11 of the NPPF confirms that the 'presumption' applies where "the *policies which are most important* for determining the application are out-of-date" [Pegasus emphasis].
- 9.15 This is a departure from the 2012 NPPF, which applied the presumption only in respect of "policies for the supply of housing" (Paragraph 49)¹.
- 9.16 The appellant asserts that as well as policies CS6, CS14 and DSP6 which establish the spatial strategy vis-à-vis the settlement boundaries, policy CS22 is also an important policy for the determination of this application because it restricts residential development by effectively treating Strategic Gaps as countryside for the purposes of preventing coalescence. As such, it is out-of-date for the purposes of paragraph 11.
- 9.17 It should also be noted that paragraphs 171 and 172 of the NPPF are clear that plans should distinguish between the hierarchy of international, national and locally designated sites, with "great weight" given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and AONBs which have the *highest status of protection in relation to these issues*. The Strategic Gap does not have this status.

The Principle of Development

- 9.18 The appeal site is located in the open countryside outside of the defined built-up settlement boundaries which inform the spatial strategy for the supply of housing.
- 9.19 The relevant policies within the Development Plan are:
- Policy CS6 'The Development Strategy';

¹ In a judgement of the Supreme Court in May 2017 (ref: [2017] UKSC 37 - Suffolk Coastal District Council v Hopkins Homes Ltd and Richborough Estates Partnership LLP and another v Cheshire East Borough), the Supreme Court ruled that a 'narrow' definition of this term was confirmed, whereby its meaning was understood to apply only to policies for housing supply rather than those *affecting* it.

- Policy CS14 'Development on Land outside Settlements';
- DSP6 'New Residential Developments outside of the Defined Urban Boundaries'; and
- Policy DSP40 'Housing Allocations'.

9.20 I now discuss the conformity of the appeal proposals with each of these policies in turn.

9.21 Whilst Core Strategy policy CS6 directs development to the settlements and strategic allocation sites, it does not preclude development from coming forward in other locations unless it would have an adverse effect on the integrity of protected European conservation sites without adequate mitigation. As will be discussed further below, the appeal proposals will not result in an adverse effect on protected sites, and therefore do not conflict with the provisions of the policy.

9.22 Policy CS14, does however perform a restrictive function, stating that development will be "strictly controlled" to "protect the countryside and coastline from development which would adversely affect its landscape character, appearance and function." Acceptable forms of development within the countryside under this policy include those essential for agriculture, forestry, horticulture and infrastructure, with a preference for conversions (as opposed to new buildings). This approach is carried forward in draft Local Plan policy SP5. Policy CS14 is supported by policy DSP6 which further narrows the list of instances in which new residential development will be permitted.

9.23 Whilst neither policy explicitly says so, I accept that the intention of providing a list of possible acceptable developments is to serve to exclude those which are unacceptable, such as major residential development which is clearly on a more significant scale than the terms of the policies seek to permit.

9.24 However, in practice the provisions of policies CS6 and CS14 are overtaken by the criteria within policy DSP40 which becomes the operative policy for determining proposed development locations outside settlement boundaries in the absence of a five-year housing land supply.

9.25 My assessment of the appeal proposals against these five key criteria is set out below.

i. The proposal is relative in scale to the demonstrated 5-year housing land supply shortfall

9.26 We will demonstrate that the housing land supply position is significantly less than 5 years. The identified supply of around 1.3 years represents a deficit of 2,032 homes. The proposals for up to 115 dwellings would assist in reducing the shortfall without over-delivering against local needs.

ii. The proposal is sustainably located adjacent to, and well related to, the existing urban settlement boundaries, and can be well integrated with the neighbouring settlement

9.27 It is helpful to look at the separate components of this criterium in isolation.

9.28 First, the site represents a sustainable location with access to local services on foot or by bicycle and connectivity to employment opportunities and higher order facilities at Fareham and Gosport. This is reflected by the confirmation from the Highway Authority that the site is accessibility located. Building on Section 3 of this Statement of Case, our evidence will include a facilities plan and more detailed discussion on this point.

9.29 S.106 Contributions will be provided to further enhance the sustainability to secure the following:

- Bus service improvement contributions;
- TOUCAN crossing on Newgate Lane relief road; and
- Improvements to school walking routes.

9.30 Secondly, the site is located close to the existing settlement of Bridgemary, the boundary of which will likely be extended into Fareham Borough by virtue of the draft allocation to the east (HA2). In this respect, it is adjacent to the existing urban boundary.

9.31 The meaning of the word adjacent has been considered in the Courts. With reference to *Simmonds v SSE and Rochdale MDC* [1981], Planning Inspector Anthony J Wharton stated in an appeal decision on the matter:

"The word 'adjacent' is not defined in the Planning Act and the courts have held that legislators were not likely to have intended 'a one size fits all approach'.

The common dictionary definition of 'adjacent' is 'lying near to' or 'contiguous', although Case Law also clarifies that that 'adjacency' does not equate to something being 'contiguous' or 'abutting'. Thus, the position established by the courts is that the word 'adjacent' does not necessarily mean [that the fence has to be] abutting or touching."

**APPENDIX 6: MR KEVIN MAJOR-MORELL AGAINST THE DECISION OF
REIGATE AND BANSTEAD BOROUGH COUNCIL**

- 9.32 As such, the proposals are not reliant on the HA2 allocation coming forward to meet this criterion. They are close to the urban boundary to the extent that, once occupied, they would have a clear visual and functional role as part of that settlement.
- 9.33 Thirdly, the proposals are well related to the neighbouring settlement. As demonstrated within the document ref. BRS.4989_68 Urban Design Response submitted with the application for the northern site, the density and scale of the proposed development as established on the parameter plans has been carefully considered to respect the local built form and to relate well to surrounding dwellings, albeit the detailed layout and appearance will form reserved matters.
- 9.34 Finally, the proposals will be well integrated with Bridgemary. Pedestrian connectivity with the new and existing communities – including access to schools, shops and other community facilities within those areas - will be provided via Woodcote Lane.
- 9.35 On the western side of the site, lies the existing residential area known as Peel Common. Whilst the LPA refers to Peel Common as a settlement, it should be stressed that it is not a village defined within a settlement boundary, but rather a linear group of dwellings which have been developed off Newgate Lane over a period of time. It contains no services or facilities with the exception of the Evangelical church, and no discernible 'centre'. The proposed development will deliver a significant area of public open space fronting Newgate Lane, which will present a significant social and environmental benefit to the community, and ensure that the visual amenity of existing dwellings is well protected.

iii. The proposal is sensitively designed to reflect the character of the neighbouring settlement and to minimise any adverse impact on the Countryside and, if relevant, the Strategic Gaps

9.36 The proposal is cognisant of its edge of settlement location within the countryside. The Design and Access Statements and Landscape and Visual Impact Assessment explains how the form, scale and design of the Illustrative Masterplan has evolved in response to a contextual analysis of the surrounding area.

9.37 Further discussion of the impact on the countryside, the Strategic Gap and Peel Common is provided in the 'Landscape Character' section below.

iv. It can be demonstrated that the proposal is deliverable in the short term

9.38 The appellant is committed to early delivery of the proposals. Bargate Homes Limited is an established housebuilder who has an excellent track-record of facilitating the construction process and enabling housing delivery in the region.

9.39 During the determination period, the appellant submitted a delivery programme to the LPA. This will be updated as part of the appeal evidence.

v. The proposal would not have any unacceptable environmental, amenity or traffic implications

9.40 The planning applications were accompanied by numerous technical reports which were issued for consultation. A position of 'no objection' was reached by all of the following subject to conditions:

- Environment Agency (flood risk);
- Lead Local Flood Authority;
- Tree Officer;
- Natural England (ecology);
- Environmental Health Officer (odour, noise and contamination);

- County Archaeologist (archaeology and built heritage);
- Historic England;
- Enabling Officer; and
- Hampshire County Council Minerals and Waste team.

9.41 Further consideration of 'amenity' issues such as overlooking, access to outdoor space and sunlight/daylight will be assessed at the reserved matters stage.

9.42 Whilst there are highways matters arising from the proposals remain at issue, the 'Highways' section below sets out the appellant's that there are no unacceptable *traffic* impacts arising (i.e. in relation to the volume of movements).

9.43 All five criteria are therefore met.

9.44 The inclusion of Policy XX: Five-Year Housing Land Supply in the draft Local Plan with almost identical provisions makes clear the LPAs intention to carry forward the approach enshrined in policy DSP40.

9.45 Therefore, although the weight to be given to the policies for the supply of housing is greatly reduced due to the application of the titled balance, the appellant's case is that there is no conflict with the development plan in respect of the principle of development in any case.

Landscape Character

9.46 In assessing the impact of the proposals on landscape character, the relevant policies within the Development Plan are:

- Policy CS14 'Development on Land outside Settlements'; and
- Policy CS22 'Development within Strategic Gaps'.

9.47 Policy CS14 is clear that development in the countryside must be strictly controlled in order to ensure that there are no adverse impacts to its landscape character.

- 9.48 This is consistent with the approach taken in the NPPF. Paragraph 127 states that planning decisions should ensure development is sympathetic to local character including landscape character. Paragraph 170 states that planning decisions should contribute to and enhance the natural and local environment by "recognising the intrinsic character and beauty of the countryside" (inter alia).
- 9.49 The application was supported by a Landscape and Visual Impact Assessment which provided an assessment of the landscape character of the setting, with reference to the LPA's own landscape character studies. This concluded that the proposals will result in a limited impact at a highly localized level.
- 9.50 The landscape matters which have arisen during the determination period are summarised in the Supporting Statement on Landscape and Visual Matters.

APPENDIX 7: SUPPORTING LANDSCAPE STATEMENT

- 9.51 During the negotiations with the LPA thorough the determination period, the LPA has honed in specifically on the alleged impacts in relation to the character of Peel Common. The appellant considers that the significance of the landscape character of Peel Common has been overstated by the LPA, and that the proposals would not offend the principles of CS14 or the NPPF when robustly assessed. This issue will be further explored in the appellant's evidence.
- 9.52 Turning to policy CS22 - which deals with development in Strategic Gaps – the pertinent 'test' is whether a proposal, either individually or cumulatively, will "significantly affect the integrity of the gap". It is therefore not the extent or location of encroachment into the gap which is to be considered but the impact on its integrity.
- 9.53 In assessing whether or not the proposals significantly affect the gap's integrity, it is necessary to define the role and purpose of the gap. Having regard to the review criteria contained within the policies CS22, the supporting policy text and p.13 of the DSP, the appellant considers the key functions to be as follows:
- Prevention of (physical) coalescence;
 - Prevention of visual 'sense' of separation;

- Retention of the character and identity of the adjacent settlements; and
- Protection of value of green infrastructure.

9.54 The development site is located on the eastern side of the Strategic Gap where the value of the landscape is more limited, and whose development would still retain a significant physical and visual separation with Stubbington. As explained above, the proposals would be well related to the Bridgemary/Peel Common area and include a significant belt of open space to the western edge which introduce green infrastructure and a landscape buffer on the more sensitive gap-fronting boundary. For these reasons, which will be elaborated upon in our evidence, we find no conflict with policy CS22.

9.55 The emerging Local Plan is resoundingly clear that development can be accommodated within the Strategic Gap, and moreover, that it is necessary to enable the authority to deliver its housing requirement. The draft allocation to develop the "HA2" site and the draft SGA both establish that development in the gap is not prohibitive per se.

9.56 However, as the appellant has argued in representations made to the draft Local Plan Supplement, the evidence base which accompanied the supplement lacks robustness and has been applied without justification.

APPENDIX 8: PEGASUS REPRESENTATIONS TO THE DRAFT LOCAL PLAN SUPPLEMENT

9.57 That evidence base does not make clear how the LPA has selected the sites put forward for allocation/designation and rejected others given the purpose of the gap. For example, the decision to develop the SGA (in the western part) of the gap seems to ignore the landscape value assessment contained within the supporting Sustainability Appraisal which highlights greater development potential in the south-eastern part of the gap. It states at pages 20-21:

"The area is almost completely within LCA 7: Fareham - Stubbington Gap. For all but the south eastern corner of the area the landscape type is open coastal plain and development potential here is moderate given the open, expansive landscape. The introduction of the Stubbington Bypass will impact the rural character of the area introducing activity and noise into the agricultural landscape. Development here is predicted to result in adverse effects to

landscape character. Around the sewage works and solar farm in the south-east corner, the landscape is considered to be of lower value on account of the utilities which have completely altered the character of the immediate area, although they are relatively well-screened by wooded bunds and planting."

APPENDIX 9: SUSTAINABILITY APPRAISAL SUPPORTING THE LOCAL PLAN SUPPLEMENT

- 9.58 The development of the SGA will also see the total coalescence of Fareham and Stubbington.
- 9.59 The Strategic LVIA submitted to support the application, provides an alternative, and detailed assessment, of why the appellant considers other parts of the Strategic Gap, including this site, are much less sensitive.
- 9.60 As such, the decision to take forward HA2 and the SGA is material to the appeals because it highlights the LPA's inconsistent approach to plan making and decision taking with regards to the purpose of the Strategic Gap.
- 9.61 Therefore, although the weight to be given to policy CS22 is greatly reduced due to the application of the titled balance, the appellant's case is that there is no conflict with the development plan in respect of the Strategic Gap of development in any case.

Design

- 9.62 The Council's Urban Designer made the following comments after the appellants' submission of a revised Illustrative Masterplan and supporting material:

"Further to discussions, I am not convinced that this sketch and accompanying explanatory annotations changes the scheme proposal fundamentally. It seeks to alter the approach from a formal structure to a lesser one in terms of the perimeter block edge treatment and potentially the horizontal alignment of the carriageways and any associated landscaping. However, the approach has not altered from the principals set out by the applicant previously in support of the application i.e.:

- *The same basic block layout with minimal front gardens;*
- *The urban character, density and form hierarchy, whereby the applicant considers that this should be highest adjacent to Newgate Lane East;*
- *Largely separating this development from the Peel Common settlement.*

The development therefore will still be largely read as a compact development set within a highly visible location and largely unrelated to the existing Settlement."

9.63 It is unclear to what extent, if any, the comments are intended to be a commentary on the design of the proposals rather than its landscape impact since the criticisms relate to the density and layout of the scheme in direct relation to its surroundings. Whilst we anticipate this matter being addressed through the exchange of evidence between landscape expert witnesses, we would reserve the right to call a Design witness, should the Council produce a putative reason for refusal on the basis of design.

9.64 The parameter plans submitted with the application for determination establish the density hierarchy within the proposed development, with the highest density closest to Newgate Lane East and the proposed HA2 allocation. As explained in the document ref. BRS.4989_68 Urban Design Response submitted with the application for the northern site, we maintain this is the correct approach to respond to the emerging urban context to the east of the site and the noise constraints of Newgate Lane East. It should be noted that should it come forward, the density of HA2 could be up to 21 dwellings per hectare across the whole site, compared to a density of 19 dwellings per hectare proposed at Land at Newgate Lane, South.

9.65 The appellant's case is therefore that conditions requiring compliance with the parameter plans and general conformity with the Illustrative Masterplan provide the necessary assurance that the high-quality design required by policy CS17 can be delivered.

Highways

9.66 The appellant has been involved with ongoing negotiations with Hampshire County Council (HCC) Highways throughout the application. Discussions have focused on three key issues:

- Whether or not the proposed vehicular access is acceptable;
- Whether or not the increased traffic associated with the development would have an unacceptable impact on the network; and
- Whether the proposed off-site works to upgrade the Newgate Lane/ Newgate Lane East are satisfactory.

9.67 A teleconference was held between the two parties on 2nd April 2020, in which it was broadly confirmed – albeit not definitively – that subject to further detail, the first two matters would be agreed.

9.68 With regard to the proposed vehicular access, the outstanding issue remains the potential for refuse vehicles to overhang the curbs. Whilst the appellant maintains that such an issue would ordinarily be dealt with through the detailed design process, it submitted additional plans to the LPA on 21st April 2020 to show tracking and visibility, but these were not formally accepted. We would hope that these are accepted by the Inspector and the LPA so that this matter can be resolved prior to the inquiry.

9.69 With regard to the impact on the network, although there remains some dispute about whether or not the trip rates should take into account the proposed affordable housing/open market split on the site (the appellant fervently asserts they should), HCC Highways confirmed that subject to detailed review of the data provided, it did not expect to find that the proposal would have an unacceptable impact on the local network given predicted growth rates.

9.70 HCC Highways has also agreed in writing that the scheme is considered accessibly located subject to the provision of acceptable S106 contributions. This is in accordance with the provisions (2) and (3) of policy CS5 which seek to ensure that proposals which will generate a significant demand for travel will be accessibly located, well served by public transport and encourage sustainable travel through planning contributions and design which promotes

walking, cycling and the use of public transport.

9.71 The main matter in dispute is therefore the acceptability of the proposed Newgate Lane/ Newgate Lane East junction improvement options.

9.72 Paragraph 109 of the NPPF is clear that:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." [Pegasus emphasis]

9.73 It is understood that HCC Highway's objection to the two options presented is that they are inherently unsafe, and therefore conflict with the NPPF. A third option was also submitted in support of the application on 21st April 2020 to provide an alternative solution which may overcome these concerns, but not formally accepted by the LPA. Again, we would hope that these plans are accepted by the Inspector and the LPA so that this matter can be at least narrowed, if not resolved, prior to the inquiry. Our detailed highways evidence will set out the appellant's argument that the options presented are safe, suitable and consistent with policy.

9.74 The junction improvements are compliant with policy DSP4 by ensuring that this proposal, together with that at Land at Newgate Lane, South, can 'wash its own face' in terms of access onto the relief road, and does not hinder the ability of the HA2 allocation to connect on to the same road and/or install a roundabout as has been suggested. The junction improvements are also compliant with policy CS5 in that they are not prejudicial to the implementation of the relief road, or on its operational capacity. It is not understood that the LPA has a concern about the proposal with regard to future development, however we will respond to any putative reason for refusal on this matter if necessary in our evidence.

On-Site Ecology

9.75 While the findings of the Ecological Appraisal (including protected species surveys) submitted with the application are otherwise accepted, the LPA alleges that the failure to provide an ecological management regime for lowland meadow at the outline stage would result in harmful ecological

impacts.

- 9.76 During the determination period, the LPA was made aware of the possibility of chamomile on the site. Ethos Ecology undertook surveys in autumn 2019 which established the presence of chamomile and other plant species which would meet the criteria of a lowland meadow (BAP priority habitat). A full NVC survey was not completed due to the existing use for horse grazing presenting a limitation to this.
- 9.77 The results of the surveys were submitted to the LPA, which showed the species in question present on the western part of the sites only, which is set out on the Open Space Parameter Plan as public open space (i.e. not to be developed for housing). On this basis, and due to restrictions around surveying, the appellant requested that any further surveys and the detailed management of the relevant area be appropriately conditioned (in the knowledge that clearly it will be retained and managed as open space in order comply with the plans if approved).
- 9.78 As set out in the correspondence at Appendix 10, there is neither any policy or legislative basis for insisting that that detailed survey work or management regime be submitted upfront, nor in our experience is it common practice.

**APPENDIX 10: CORRESPONDENCE WITH THE LPA ON CHAMOMILE
AND BAP PRIORITY HABITAT**

- 9.79 Policy DSP13 establishes four criteria which all new development must meet:
- "i. designated sites and sites of nature conservation value are protected and where appropriate enhanced;*
- ii. protected and priority species populations and their associated habitats, breeding areas, foraging areas are protected and, where appropriate, enhanced;*
- iii. where appropriate, opportunities to provide a net gain in biodiversity have been explored and biodiversity enhancements incorporated; and*
- iv. The proposal would not prejudice or result in the fragmentation of the biodiversity network."*

9.80 The application was supported by a suite of ecological information including recommendations for mitigation and enhancement which have been accepted by the LPA, and a biodiversity net gain calculator. Subject to the necessary conditions being imposed, the appellant does not find any harms in relation to policy DSP13.

Off-Site Ecological Impacts

9.81 Policy CS4 and policy DSP15 seek to ensure that sites designated for their nature conservation importance (including ecologically sensitive European sites which have the highest level of protection in the hierarchy) are protected from the adverse effect of development. The appeal sites are not within any designated sites, but are located in proximity to a number of designated sites.

9.82 These include the Solent and Southampton Water SPA and Ramsar (approximately 2.3kms south-west) and Portsmouth Harbour SPA and Ramsar (approximately 1.3kms north-east), which also subject the proposals to the HRA process under the Habitats Directive.

9.83 The LPA has not formally undertaken an Appropriate Assessment in respect of the proposals.

9.84 However, in the first consultation response of the Ecology Officer in relation to the southern application, it identified a number of Likely Significant Effects (LSEs), noting that it was necessary to proceed to the Appropriate Assessment stage.

9.85 The table below summarises the assessment provided by the ecology officer of the identified LSEs.

Likely Significant Effect	Mitigation Identified
Loss of SPA supportive habitat	A contribution towards the Solent Waders and Brent Geese Strategy will be secured through a S.106 agreement in accordance with policy DSP14

Increased recreational disturbance A contribution towards Solent Recreation Mitigation Strategy will be secured through a S.106 agreement

Hydrological changes from surface water The implementation of a SuDS scheme and a Construction Environmental Management Plan, as secured by condition

Hydrological changes from foul water No mitigation required provided calculations show nitrate neutrality

9.86 The ecology officer therefore reaches an informal conclusion of "no adverse effect on the integrity [of the SPAs]" subject to the appropriate conditions/contributions and outcome of the nitrate calculations.

APPENDIX 11: ECOLOGY OFFICER RESPONSE

9.87 Natural England has not objected to the application.

9.88 The nitrate calculations provided by the appellants were updated and submitted to the LPA on 21st April 2020 in response to the updated Natural England guidance (March 2020) and re-confirm that the proposals would be nitrate neutral and therefore no mitigation is required.

9.89 However, due to the stance taken in the planning officer's email of 24th March 2020, WYG has now undertaken a more detailed "shadow HRA" for the site on behalf of the appellant to support the appeal. In addition to the 4 no. LSEs identified above, WYG also considers the impact of the proposals on the air quality of the SPAs with reference to two reports, one produced by REC which was commissioned by the appellants, and another produced by Ricardo on behalf of the LPA.

9.90 The Shadow HRA also reaches a conclusion of no adverse effects on the

integrity of the SPAs. In the event that the Council does not accept this position, our evidence will explain and justify our methodology further.

APPENDIX 12: SHADOW HRA

9.91 It should be borne in mind that the presumption still applies where Appropriate Assessment is carried out unless the integrity of the habitats site(s) is found to be adversely affected.

Planning Obligations

9.92 The appellants have not yet entered into a legal agreement with the Council. This process will be negotiated on submission and registration of the appeals.

9.93 This will include the following obligations to which the appellant has committed:

- 40% affordable housing in line with a mix and tenure split to be specified by the Council;
- Education contributions (value to be negotiated);
- Off-Site Highway (S.278) Works (value subject to design);
- Bus service improvement contributions;
- TOUCAN crossing on Newgate Lane relief road;
- Improvements to school walking routes;
- Solent Wader and Brent Goose Strategy contribution;
- Solent Recreation Mitigation Strategy;
- On-site open space provision and maintenance; and
- Implementation of a Travel Plan.

10.0 Matters not at Issue

10.1 The following matters are considered not to be at issue.

Sustainability

10.2 The proposal meets the NPPF definition of sustainable development.

10.3 Hampshire County Council Highways has confirmed in writing that the site is accessibly located, and as outlined in this Statement, residents will have good access to a range of services, jobs, education, leisure facilities and green spaces.

10.4 The proposal is supported by a Travel Plan and other sustainable transport measures to be secured through a S.106 Agreement.

Loss of Best and Most Versatile Agricultural Land

10.5 Policy CS16 states that new development should prevent the loss of grade 1, 2 and 3a land.

10.6 In our Planning Statement, we argued:

"In the Fareham context, the development of circa 2 ha. of grade 3a land is considered quantitatively and qualitatively insignificant. Moreover, the guidance set out in the NPPF takes into account the Government's objective to facilitate sustainable development in the interests of growth, and acknowledges that weight should be given to the benefits of using best and most versatile land."

10.7 This has not been disputed by the LPA. The loss of the agricultural land is to be weighed as a minor adverse impact in the planning balance having regard

to benefits of the provision on new housing.

Housing and Affordable Housing

- 10.8 The Enabling Officer accepts the policy-compliant level of affordable housing proposed (40%) subject to securing an appropriate tenure split and mix in response to the Core Strategy and local needs evidence through a S.106 agreement. The proposals are therefore fully compliant with policy CS18.

Surface Water Flood Risk and Drainage

- 10.9 The application was supported by a Flood Risk Assessment which has been accepted by the Lead Local Flood Authority (LLFA), Hampshire County Council, subject to a pre-commencement condition to secure a detailed surface water drainage scheme.
- 10.10 The FRA confirms that the proposed development will incorporate a sustainable drainage system which will discharge surface water at the existing greenfield runoff rate into the existing watercourses, and that sufficient storage can be provided on site to cater for all storm return periods up to and including the 1:100 year rainfall event with a 40% allowance for climate change.
- 10.11 Southern Water has also requested a detailed drainage strategy be secured by condition, and recommends the LPA also demands a SuDS maintenance and management scheme.
- 10.12 The proposals therefore accord with policies CS15, CS16 and chapter 14 of the NPPF which seek to ensure that flood risk is effectively and sustainably managed.

Foul Water Drainage

- 10.13 Foul drainage will be discharged via a foul pumping station into the existing

public foul sewer beneath Newgate Lane.

- 10.14 Southern Water has highlighted the approximate position of a public foul rising main within the site, and requested easement distances for any works to be carried out in proximity. The suggested condition (which is included in the draft Statement of Common Ground) deals with this matter by ensuring the developer consults with the LPA and Southern Water on the sewer protection measures prior to development.

Heritage and Archaeology

- 10.15 The application was supported by a Heritage Assessment which concludes 'no harm' in relation to built heritage assets (including the non-designated 19th century farm building to be demolished on-site and nearby Grade II listed Carriston Cottage and Foxbury Farmhouse), and this has not been disputed by the LPA.
- 10.16 The potential for archaeology on the sites is however is noted, and the HCC Archaeology Officer requests suitable conditions to secure and implement a WSI, to which the appellants agree. This approach is consistent with paragraph 199 of the NPPF and policy DSP5 which encourage a proportionate response to heritage recording.

Noise

- 10.17 The Environmental Health Officer has accepted the conclusions of our acoustic consultant in relation to traffic noise, which it is agreed can be appropriately mitigate at reserved matters stage through glazing specification, trickle vents and/or an acoustic barrier. He also accepts the findings of our Aircraft Noise Assessment that there would be no adverse effect on amenity.
- 10.18 The provisions of DSP2 are therefore considered to be met with regard to the amenity of future residents.

Air Quality

10.19 The Environmental Health Officer accepts the findings of the submitted Air Quality Reports, subject to the imposition of conditions to secure electric vehicle charging points and gas-fired boilers meeting <40 mgNO_x/kWh. The provisions of DSP2 are therefore considered to be met with regard to the amenity of future residents.

Odour

10.20 The site is located within close proximity to Peel Common Waste Water Treatment Works.

10.21 The LPA's Environmental Health Officer accepts the findings of the submitted Odour Report and Odour Technical Note which predict that odour from Peel Common Sewage Works will be within acceptable limits (C98, 1-hour <30OdU/m³) and therefore raises no objection. The provisions of DSP2 are therefore considered to be met with regard to the amenity of future residents.

10.22 In February 2020, Southern Water submitted additional comments asks for an odour survey to be to be agreed based on a 1.5OdU (odour unit) contour; however, apparently it hasn't viewed the reporting and agreement reached with the LPA noted above. These comments have been rebutted in a revised Odour Technical Note.

Public Open Space

10.23 The Open Space Assessment submitted with the application provided a detailed assessment to demonstrate how the proposals adhere to, or exceed, the standards set out in policy CS21, having regard to the overprovision of amenity space proposed on-site and the accessibility of off-site public open spaces.

Contamination

- 10.24 The Environmental Health Officer has reviewed the submitted Phase 1 Contamination Report and is satisfied with the proposals subject to an intrusive site investigation prior to development and implementation of necessary remedial measures. The provisions of DSP2 are therefore considered to be met with regard to the amenity of future residents.

Trees

- 10.25 Subject to the provision of a detailed tree protection method statement and landscaping / tree planting scheme, the Council's tree officer raises no objections in principle to the proposed outline planning permission(s).
- 10.26 The Ecology officer is also satisfied that necessary buffers to protect habitats provided by existing trees can be secured by condition.
- 10.27 The provisions of CS4 to protect trees and the important habitats they provide for wildlife are therefore met.

Minerals

- 10.28 The application site falls partially within the 'Whitecliff Sand Member' area which is identified in the Hampshire Minerals and Waste Local Plan as a Minerals Safeguarding Area. HCC accepts the conclusion of the submitted Mineral Safeguarding Report that prior extraction is not practical or necessary, subject to the imposition of a condition (as part of a CEMP) to require incidental extraction during the construction process.

11.0 The Planning Balance

11.1 The NPPF explains that there are three dimensions to sustainable development, and these are:

- Economic;
- Social; and
- Environmental.

11.2 We consider that the appeal proposals reflect all three dimensions and thus represent sustainable development. As explained below the proposals will secure significant benefits which must be weighed in the planning balance.

Economic

11.3 In respect of economic matters, Pegasus Group produced separate Economic Benefits Statements as appendices to the Planning Statements submitted in support of the applications. They quantify the benefits that would be created by the schemes including:

- Construction employment opportunities;
- Contribution of the construction phase to economic output;
- Household expenditure associated with residents of the new dwellings; and
- Economically active people in employment attracted to live in the new dwellings.

11.4 Taken together with Land at Newgate Lane, North, the proposals would result in approximately 235 economically active new residents once fully occupied, of which around 46% are expected to be employed in higher value occupations. The households are estimated to generate expenditure in the region of £6.4million per annum.

11.5 Taken together with Land at Newgate Lane, North, the appeal proposals could support an estimated 191 jobs during the three-year build programme, considering on-site roles and indirect and induced effects, and could generate

an additional £33.8million of gross value added for the regional economy during this period.

11.6 Construction workers are reliant upon a constant stream of new sites to keep them employed and levels of certainty to encourage construction companies to employ new workers.

11.7 Following the recession, the government placed significant importance on the construction industry to kick start the economy. There has been clear emphasis on planning for growth through national policy initiatives including the NPPF which was intended to stimulate the economy. The decline in the economy resulting from the current coronavirus pandemic is likely to rely equally on the construction and development industries to ignite growth and confidence.

Social

11.8 The development will provide a mix of housing types and sizes, meeting the needs of the local population.

11.9 Substantial weight must be given to the provision of housing per se in the light of the authority's current housing land supply, and the extent of the undersupply which equates to a supply of around one-quarter of its five-year requirement.

11.10 Substantial weight must also be given to the provision of affordable housing in light of the chronic historic of under-delivery which we will detail in our evidence. In accordance with Core Strategy policy CS18, the development will provide 40% on-site affordable housing with no public subsidy to be secured in perpetuity through a Section 106 Agreement. This would constitute a substantial benefit in terms of paragraph 11 of the NPPF.

11.11 Additional dwellings, provided within a sustainable location, mean flexibility and choice for the market which will help the delivery of 'significantly boosting' housing in this District. It should be noted that if housing needs are not met then house prices will continue to rise and problems with affordability will increase. It must be recognised that the sales proceeds from the open market housing will help subsidise the delivery for the affordable housing element of the scheme. This is especially pertinent in Fareham, whereas will further

outline in our evidence, the affordability of housing in Fareham is worse than the government defines as 'acceptable', with house prices being on average a staggering 9.24 times the household income.

- 11.12 The proposals also include a significant area of public open space and children's play area which provide places for recreation, play and walking, and help contribute towards wider Development Plan objectives to support healthy communities.

Environmental

- 11.13 In terms of the environmental role, the proposals are sustainably located on land which is not subject to any landscape designation.

- 11.14 The site has been the subject of extensive ecological surveys and the key ecological features, primarily important hedgerows and trees, are proposed to be retained. The development will introduce significant areas of public open space alongside open water features that serve as part of the sustainable drainage system.

- 11.15 The appellant has committed to enhancement measures including the creation of swales and wildflower meadows, log piles, the retention of darkened corridors and the installation of bat and bird boxes, and has submitted a Net Gain biodiversity calculator to demonstrate that an overall net positive effect will be achieved.

- 11.16 In terms of the effect on designated sites, **the Shadow HRA has shown the proposals to result in no adverse effects.** The proposals will not adversely impact upon local hydrology or air quality, and mitigation payments will be secured in respect of the potential impacts on Solent Brent Geese and Waders and increased recreational use.

- 11.17 The dwellings will be designed to reduce overall energy and carbon dioxide emissions by reducing energy consumption through design, orientation, lighting, heating requirements and air tightness, including low energy appliances and heating systems.

- 11.18 The appellants have also confirmed their commitment to the following measures to be secured by condition:

-
- Provision of at least 1 electric vehicle (EV) rapid charge point per 10 residential dwellings;
 - All gas-fired boilers to meet a minimum standard of <40 NO_x/kWh; and
 - All dwellings to be designed with water efficiency measures to seek to meet the government's optional standards requirement of no more than 110 litres per person per day usage.

12.0 Planning Balance

12.1 One of the fundamental objectives of the NPPF is to boost the supply of housing as part of the 'golden thread' of the presumption in favour of sustainable development.

The Tilted Balance

12.2 The NPPF test provides that in the absence of a five year housing land supply, planning permission should be granted without delay unless any adverse impacts of doing so would "significantly and demonstrably outweigh the benefits", when assessed against the policies in this Framework taken as a whole".

12.3 The planning assessment provided above is now summarised with regard to this test, and in respect of the social, economic and environmental dimensions of sustainability.

Economic

- Increased local spending Significant Benefit
- Construction jobs and related industries Substantial Benefit

Social

- Provision of new housing Substantial Benefit
- Provision of affordable housing Substantial Benefit
- On-Site Open space Moderate Benefit

Environmental

- On-site Mitigation and enhancement Moderate Benefit
- Commitment to sustainable design Minor Benefit
- Effect on the SPAs Neutral
- Landscape Impact Minor adverse impact

- Loss of agricultural land Minor adverse impact

12.4 The three dimensions of sustainable development have been assessed and it is concluded that not only do the adverse impacts not significantly or demonstrably outweigh the benefits when assessed against the policies in the NPPF as a whole, but the benefits significantly outweigh any harm.

Compliance with the Development Plan

12.5 Notwithstanding the application of the tilted balance described above, it must be highlighted that in the situation where a five-year housing land supply cannot be demonstrated, policy DSP40 is engaged.

12.6 Whilst it is accepted that policies CS14 and DSP6 serve to direct development to within the settlement boundaries, DSP40 establishes that development will be permitted outside these limits where there is no five-year housing land supply and where the relevant criteria are met.

12.7 Section 9 (paragraphs 9.25 to 9.43) above demonstrates that the proposal is:

- relative in scale to the five-year housing land supply shortfall;
- well located and integrated with the neighbouring settlement;
- sensitively designed and respects the landscape and character of the area;
- deliverable in the short term; and
- all environmental, amenity and traffic implications are robustly addressed.

12.8 In the balancing exercise the urbanising effect of development of a greenfield site is therefore weighed against policy DSP40, and having met all the criteria described above we conclude that the proposal represents well designed, integrated sustainable development which can bring forward up to 115 new homes within 5 years.

12.9 Similarly, the proposal is also compliant with policy CS22 which allows development with the Strategic Gap where it does not adversely affect the integrity of the gap.

12.10 Section 9 (paragraphs 9.46 to 9.61) above establishes that the proposal would:

- Not result in the coalescence of local settlements;
- Allow a visual 'sense' of separation to be maintained;
- Retain the character and identity of the adjacent settlements; and
- Protect the value of green infrastructure.

12.11 The provisions of policy CS22 are therefore met.

13.0 Conclusions

- 13.1 This Statement of Case accompanies an appeal against Fareham Borough Council in respect of its failure to issue a decision on the outline planning application at Land at Newgate Lane, South.
- 13.2 Although the appeal site is located outside of the settlement boundary and in the Strategic Gap, it is sustainably located close to a range of facilities and services by sustainable modes of transport. We maintain proposal would represent a substantial benefit to Fareham through the delivery of new homes and affordable homes.
- 13.3 It is not within the Green Belt, AONB or subject to landscape or ecological designations.
- 13.4 In the absence of a five-year housing land supply, paragraph 11 of the NPPF is engaged and the appeal proposals is assessed against the 'presumption in favour of sustainable development' which requires that development is approved without delay unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 13.5 The discussion in sections 7-9 asserts the appellant's case that the proposal meets this test, and moreover, that regardless of the five-year housing land supply position is a sustainable scheme which is compliant with the Development Plan. Section 10 goes on to confirm all the technical matters which are considered to be agreed with the LPA, including drainage, environmental amenity, arboriculture and natural resources.
- 13.6 Although the Council has indicated potential recommended reasons for refusal, we do not know whether these would all form the basis for its appeal statement. We hope to reach agreement on a number of matters in advance of the inquiry.
- 13.7 In summary, having regard to the Council's lack of a 5-year housing land

supply position, the NPPFs presumption in favour of sustainable development and all other material considerations, it is concluded that the proposal represents a sustainable development the benefits of which would not be significantly or demonstrably outweighed by any adverse impacts. Outline planning permission should be granted.

APPENDIX 1

PLANNING APPLICATIONS DOCUMENTS LIST

APPENDIX 1 - SOUTH

5. List of Original Plans and Reports

Plan Title	Reference No.	Revision
Illustrative Masterplan Framework	BRS.4989_20_2	Rev F
Site Location Plan	BRS.4989_21_2	Rev B
Topographical and Lidar Data	BRS.4989_23_2	Rev B
Existing Block Plan	BRS.4989_45_2	Rev B
Access Parameter Plan	BRS.4989_46_2	Rev A
Indicative Public Open Space Parameter Plan	BRS.4989_47_2	Rev C
Building Heights Parameter Plan	BRS.4989_48_2	Rev B
Density Parameter Plan	BRS.4989_49_2	Rev B
Illustrative Section of Eastern Boundary	BRS.4989_52_2	-
Illustrative Section of Southern Boundary	BRS.4989_53	-
Access Plan	BRS.4989_Figure 9	-
Tree Reference Plan	PEG21756-02 (south)	-

Report Title	Author	Date/ Ref No.
Design and Access Statement	Pegasus Group	March 2019
Planning Statement	Pegasus Group	March 2019
Affordable Housing Statement	Pegasus Group	March 2019
Open Space Assessment	Pegasus Group	March 2019
Statement of Community Involvement	Pegasus Group	March 2019
Draft Heads of Terms	Pegasus Group	March 2019
Transport Assessment	Pegasus Group	April 2019
Heritage Desk-Based Assessment	Pegasus Group	March 2019
Landscape & Visual Impact Assessment	Pegasus Group	April 2019
Ecological Assessment	Ethos Environmental	V2, April 2019
Tree Report	ACD Environmental	Sept 2018
Arboricultural Impact Assessment	ACD Environmental	April 2019
Flood Risk Assessment	The Civil Engineering Practice	V2.1, April 2019
Utilities Statement	The Civil Engineering Practice	V2.1, April 2019
Detailed Odour Constraints Assessment	Accon UK	April 2019
Air Quality Assessment	Accon UK	April 2019
Phase 1 Contaminated Land Assessment	Accon UK	April 2019
Road Traffic Noise Assessment	Hepworth Acoustics	December 2018
Aircraft Noise Survey Report	Hepworth Acoustics	18.12.18

6. List of Additional Plans and Reports

Plan Title	Reference No.	Revision
Illustrative Hedgerow Section	BRS.4989_72	-
Illustrative Masterplan Framework	BRS.4989_20_2	Rev H
Indicative Public Open Space Parameter Plan	BRS.4989_47_2	Rev D
Building Heights Parameter Plan	BRS.4989_48_2	Rev C
Density Parameter Plan	BRS.4989_49_2	Rev C
Updated Figure 8 to LVIA (Illustrative Landscape Masterplan)	Figure 8	Rev D
Tenancy Agreement Plan	-	-
Signalised Junction	BRS.4989_Figure 16	Rev A
Junction Option 2 Plan	BRS.4989	Rev A

Report Title	Author	Date/ Ref No.
Aerial Photographs	Pegasus Group	-
Transport Technical Note	Pegasus Group	June 2019
Minerals Report	MEWP	July 2019
Design and Access Statement	Pegasus Group	Sept 2019
Planning Statement	Pegasus Group	Sept 2019
Affordable Housing Statement	Pegasus Group	Sept 2019
Open Space Assessment	Pegasus Group	Sept 2019
Statement of Community Involvement	Pegasus Group	Sept 2019
Draft Heads of Terms	Pegasus Group	Sept 2019
Heritage Desk-Based Assessment	Pegasus Group	Sept 2019
Landscape & Visual Impact Addendum	Pegasus Group	Sept 2019
Ecological Assessment	Ethos Environmental	V3, Sept 2019
Arboricultural Impact Assessment	ACD Environmental	Sept 2019
Flood Risk Assessment	The Civil Engineering Practice	V3.1, Oct 2019
Utilities Statement	The Civil Engineering Practice	V3.0, Aug 2019
Odour, Air Quality and Contamination Technical Addendum	Accon	Sept 2019
Road Traffic Noise Assessment	Hepworth Acoustics	August 2019
Air Quality Ecological Impact Statement	REC	Nov 2019
Ecology Response (Email)	Ethos Environmental	20.11.19
Letter from Farmer	Mr Ball	14.12.19
Tenancy Agreement	-	-
LinSig Modelling	Red Wilson	V1
Transport Technical Note - Modelling	Pegasus Group	Feb 2020
Road Safety Audit – Signals	Andy Paul	March 2020
Road Safety Audit – Priority Junction	Andy Paul	March 2020
Designers Response – Signals	Pegasus Group	March 2020
Designers Response – Priority Junction	Pegasus Group	March 2020
Strategic LVIA	Pegasus Group	March 2020
Nitrate Calculation	The Civil Engineering Practice	21.04.20
Odour Technical Note	Accon UK	08.04.20

6. List of Final Plans & Reports on which the LPA is making its Decision

Plan Title	Reference No.	Revision
Illustrative Masterplan Framework	BRS.4989_20_2	Rev H
Site Location Plan	BRS.4989_21_2	Rev B
Topographical and Lidar Data	BRS.4989_23_2	Rev B
Existing Block Plan	BRS.4989_45_2	Rev B
Access Parameter Plan	BRS.4989_46_2	Rev A
Indicative Public Open Space Parameter Plan	BRS.4989_47_2	Rev D
Building Heights Parameter Plan	BRS.4989_48_2	Rev C
Density Parameter Plan	BRS.4989_49_2	Rev C
Illustrative Section of Eastern Boundary	BRS.4989_52_2	-
Illustrative Section of Southern Boundary	BRS.4989_53	-
Access Plan	BRS.4989_Figure 9	-
Tree Reference Plan	PEG21756-02 (south)	-
Illustrative Hedgerow Section	BRS.4989_72	-
Updated Figure 8 to LVIA	Figure 8	Rev D
Tenancy Agreement Plan	-	-
Signalised Junction	BRS.4989_Figure 16	Rev A
Junction Option 2 Plan	BRS.4989	Rev A

Report Title	Author	Date/ Ref No.
Design and Access Statement	Pegasus Group	Sept 2019
Planning Statement	Pegasus Group	Sept 2019
Affordable Housing Statement	Pegasus Group	Sept 2019
Open Space Assessment	Pegasus Group	Sept 2019
Statement of Community Involvement	Pegasus Group	Sept 2019
Draft Heads of Terms	Pegasus Group	Sept 2019
Transport Assessment	Pegasus Group	April 2019
Heritage Desk-Based Assessment	Pegasus Group	Sept 2019
Landscape & Visual Impact Assessment	Pegasus Group	April 2019
Ecological Assessment	Ethos Environmental	V3, Sept 2019
Tree Report	ACD Environmental	Sept 2018
Arboricultural Impact Assessment	ACD Environmental	Sept 2019
Flood Risk Assessment	The Civil Engineering Practice	V3.1, Oct 2019
Utilities Statement	The Civil Engineering Practice	V3.0, Aug 2019
Detailed Odour Constraints Assessment	Accon UK	April 2019
Air Quality Assessment	Accon UK	April 2019
Phase 1 Contaminated Land Assessment	Accon UK	April 2019
Road Traffic Noise Assessment	Hepworth Acoustics	August 2019
Aircraft Noise Survey Report	Hepworth Acoustics	18.12.18
Aerial Photographs	Pegasus Group	-
Transport Technical Note	Pegasus Group	June 2019
Minerals Report	MEWP	July 2019
Landscape & Visual Impact Addendum	Pegasus Group	Sept 2019
Odour, Air Quality and Contamination Technical Addendum	Accon	Sept 2019
Air Quality Ecological Impact Statement	REC	Nov 2019
Ecology Response (Email)	Ethos Environmental	20.11.19
Letter from Farmer	Mr Ball	14.12.19
Tenancy Agreement	-	-
LinSig Modelling	Red Wilson	V1
Transport Technical Note - Modelling	Pegasus Group	Feb 2020
Road Safety Audit – Signals	Andy Paul	March 2020
Road Safety Audit – Priority Junction	Andy Paul	March 2020
Designers Response – Signals	Pegasus Group	March 2020
Designers Response – Priority Junction	Pegasus Group	March 2020
Strategic LVIA	Pegasus Group	March 2020
Nitrate Calculation	The Civil Engineering Practice	21.04.20
Odour Technical Note	Accon UK	08.04.20

9. Plans also submitted, but not accepted by the LPA

Plan Title	Reference No.	Revision
Access Plan	BRS.4989_Figure 9	Rev D
Access - Visibility	BRS.4989 SK02	Rev B
Access - Swept Path	BRS.4989 SP02	Rev B
Junction Option 3 Plan	BRS.4989_ADS JCN 3	Rev A
Junction Option 3 - Swept Path	BRS.4989_ADS JCN 3 SPA	Rev A
Junction Option 3 - Visibility	BRS.4989_ADS JCN 3 VISI	Rev A

Report Title	Author	Date/ Ref No.
Road Safety Audit – Option 3	Andy Paul	April 2020
Designers Response – Option 3	Pegasus Group	April 2020
DMRB Design Compliance Table	Pegasus Group	April 2020

9. New Plans not seen by the LPA

Report Title	Author	Date/ Ref No.
Report to Inform Habitats Regulations Assessment Stage 1 and Stage 2 ('Shadow HRA')	WYG	April 2020
Corrected Air Quality Ecological Impact Statement (to inform HRA)	REC	May 2020

APPENDIX 2

INSPECTOR'S EXAMINATION REPORT TO THE CORE STRATEGY



The Planning
Inspectorate

Report to Fareham Borough Council

by **Michael J Hetherington BSc(Hons) MA MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 20th July 2011

PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO FAREHAM LOCAL DEVELOPMENT
FRAMEWORK CORE STRATEGY**

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 28 February 2011

Examination hearings held between 17 and 26 May 2011

File Ref: PINS/A1720/429/3

Abbreviations Used in this Report

AA	Appropriate Assessment
BRT	Bus Rapid Transit
CIL	Community Infrastructure Levy
CLG	Communities and Local Government
DPD	Development Plan Document
HA	Highways Agency
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Scheme
NE	Natural England
ODPM	Office of the Deputy Prime Minister
PPG	Planning Policy Guideline
PPS	Planning Policy Statement
PUSH	Partnership for Urban South Hampshire
RS	Regional Strategy
SADM DPD	Site Allocations and Development Management DPD
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SDA	Strategic Development Area
SEP	South East Plan
SHLAA	Strategic Housing Land Availability Assessment
SPD	Supplementary Planning Document
WCC	Winchester City Council

Non-Technical Summary

This report concludes that the Fareham Core Strategy Development Plan Document provides an appropriate basis for the planning of the Borough over the next 15 years. The Council has sufficient evidence to support the strategy and can show that it has a reasonable chance of being delivered.

A limited number of changes are needed to meet legal and statutory requirements. These can be summarised as follows:

- amendments to the North of Fareham Strategic Development Area proposal to delete references to the proposed employment area at M27 junction 11, require further testing of transportation options and reflect up-to-date assumptions about housing delivery rates;
- simplification of the sequential approach to assessing housing proposals, whilst retaining the priority to be given to the re-use of previously developed land in urban areas;
- providing greater clarity about the Council's approach to the protection of employment land;
- clarifying the role of future local plans in making specific site allocations and reviewing policy boundaries;
- including greater detail on methods of avoiding or mitigating likely adverse effects on international nature conservation sites;
- clarifying the policy approach in respect of Gypsies, Travellers and Travelling Showpeople to distinguish development management guidance from site allocation criteria;
- amending references to developer contributions to align more closely with national policy and reflect the Council's intention to prepare a Community Infrastructure Levy charging schedule;
- addition of criteria to guide the future review of strategic gap boundaries;
- amendments to criteria for sustainable construction and renewable energy.

Most of the changes recommended in this report are based on proposals put forward by the Council in response to points raised and suggestions discussed during the public examination. None of the recommended changes alter the thrust of the Council's overall strategy.

Introduction

1. This report contains my assessment of the Fareham Core Strategy Development Plan Document (DPD), henceforth referred to as the Core Strategy, in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004. It considers whether the Core Strategy satisfies the relevant legal requirements and whether it is sound. Planning Policy Statement 12: *creating strong safe and prosperous communities through Local Spatial Planning* (PPS 12) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
2. In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for the examination is the submitted draft Core Strategy (February 2011) which is the same as the document published for consultation in December 2010.
3. My report deals with the changes that are needed to make the DPD sound. These are identified in bold in the report. Most of the detailed changes have been proposed by the Council and are presented in Appendix A using the reference number from the Council's schedule of changes¹. The changes that I recommend are set out in Appendix C². None of these changes materially alter the substance of the plan and its policies, or undermine the sustainability appraisal and participatory processes undertaken. In a small number of cases I have not accepted a change that has been suggested by the Council: where this is the case, it is explained in this report.
4. Some of the changes put forward by the Council are factual updates, corrections of minor errors or other minor amendments in the interests of clarity. As these changes do not address key issues of soundness they are generally not referred to in this report – although I endorse the Council's view that they improve the plan. These are shown in Appendix B. I am content for the Council to make any additional minor changes to page, figure, paragraph numbering and to correct any spelling errors prior to adoption.
5. During the examination, I sought the views of all parties on the Ministerial Statement of 23 March 2011 on 'Planning for Growth' and on the changes that are now proposed to national policy in relation to Gypsies, Travellers and Travelling Showpeople. The Council undertook an additional focussed consultation in respect of changes that it has suggested in respect of Core Strategy policy CS6. In writing this report, I have had regard to the responses to all of these consultation exercises.

¹ These are shown in square brackets and bold text, thus **[1.1]**. Numbering is consistent with that set out in the Council's Consolidated Schedule of Proposed Changes (Core Document reference: CD27D).

² Changes recommended by the Inspector are referenced as IC, thus **IC1**.

Assessment of Soundness

6. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings, I have identified five main issues upon which the soundness of the plan depends.

Main Issue 1: Are the Core Strategy's proposals for the North of Fareham Strategic Development Area (SDA) realistic, deliverable, adequately justified, consistent with sub-regional policy and in general conformity with the Regional Strategy?

7. The North of Fareham SDA represents the most significant and controversial element of the Core Strategy. The evolution of the proposal is rehearsed in detail in the submitted evidence base, and summarised in the Core Strategy (notably at paragraphs 5.65 to 5.95). While the principle of the SDA's development is contained in the regional strategy – policy SH2 of the South East Plan (SEP) – the justification for the proposal derives from evidence prepared by South Hampshire local authorities (the Partnership for Urban South Hampshire [PUSH]) during the SEP's preparation. As explained in the relevant background paper³, the SDA concept is supported in preference to cumulative 'bolt-on' additions to existing settlements. The advantages of SDAs are seen as threefold: safeguarding existing towns and villages by reducing coalescence; providing more opportunities for planning gain; and achieving a critical mass to deliver sustainability benefits. The development now proposed is one of two SDAs proposed by PUSH and brought forward into the SEP. Both are aimed at meeting sub-regional housing needs and, as such, their housing totals are separated from the housing requirement for the remainder of the Boroughs concerned in the sub-regional strategy and SEP.
8. In bringing the SDA proposal into the Core Strategy, the Council has therefore relied in part on the evidence base submitted in respect of the SEP and the sub-regional strategy – including the Sustainability Appraisal (SA) that was undertaken for the SEP. Further options in relation to the SDA have not been explored. Bearing in mind that the principle of the SDA has already been accepted in the SEP, this approach appears justified. Subsequent to the SEP's approval, additional work has been undertaken in order to examine specific constraints applying to the SDA 'area of search'. In summary, the effect of these studies has been to reduce the proposed scale of the SDA. I return to this matter in more detail below.
9. It has been put to me that, given the Government's intention to abolish regional strategies, less (or no) weight should be attached to the SEP and that, as a result, the principle of the SDA should be reconsidered in line with the localism agenda. While I understand these concerns, such a fundamental review is outside the scope of this examination. The SEP remains part of the development plan, and the requirement of general conformity set out in

³ PUSH - Rationale for the Housing Distribution: Background to the South Hampshire Sub-Regional Strategy (Core Document reference CE80).

section 24(1) of the 2004 Act (as amended) remains applicable. This view has recently been reinforced by the Court of Appeal's decision in *Cala Homes (South) Ltd, R (on the application of) v Secretary of State for Communities and Local Government & Anor [2011] EWCA Civ 639*, which states, among other matters, that: 'It would be unlawful for a local planning authority preparing, or a Planning Inspector examining, development plan documents to have regard to the proposal to abolish regional strategies. For so long as regional strategies continue to exist, any development plan documents must be in general conformity with the relevant regional strategy.'⁴ As such, the Government's intention to abolish the SEP does not mean that the SDA proposal should be withdrawn or reconsidered.

10. Before turning to the detail of the SDA proposal it is also necessary to address concerns that have been raised about a lack of clarity and consistency in respect of its underlying rationale. Various Council publications, most notably a special edition of 'Fareham Today' that was published shortly before the examination hearings, give the impression that the SDA is intended to meet Borough, rather than sub-regional, housing needs. This clearly conflicts with the evidence base, as described above. While the sub-regional housing requirement would necessarily include a local element, the scale of such local provision has not been quantified.
11. Furthermore, while additional demographic evidence has been prepared by the Council, this does not justify a development of the scale proposed at the SDA solely to satisfy housing needs generated within Fareham Borough. This point was accepted by the Council in its response to my preliminary questions, and re-emphasised in its oral comments at the relevant hearing session.
12. The Core Strategy does not propose a specific allocation in respect of the SDA. Instead, policy CS13 sets the context for the preparation of a future Area Action Plan (AAP) which will set out detailed guidance for the development. In general terms, this approach is understandable – and is consistent with the present state of the evidence base. Although a substantial amount of work has been carried out, a number of detailed matters remain to be resolved. Most importantly, the likely scale of housing development within the SDA remains to some extent uncertain. Various factors are likely to bear upon this figure and, as such, the adoption of a range of total dwelling numbers in policy CS13 is appropriate. I am able to afford only limited weight to the Council's viability assessment⁵, key assumptions of which (for example the threshold figure above Existing Use Value at which viability is assumed) have not been made public. However, and on balance, the deliverability evidence before me (including comments made by representors at the relevant hearing session) strongly suggests that it is unlikely that the lower figure proposed in policy CS13 (of 6,500 dwellings) will be achieved within the Core Strategy period. This is recognised by the Council, and I endorse its suggested clarification regarding the likely delivery timescale **[5.24]** for reasons of effectiveness.

⁴ Paragraph 24 of the Court of Appeal decision.

⁵ Prepared by BPS (Core Document reference CE43).

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13. Nevertheless, I consider that the assessment of relevant constraints and land availability is, in broad terms, sufficiently robust to justify the Core Strategy's departure from the scale of development set out in the SEP. In particular, I attach significant weight to the capacity analysis studies prepared for the Council in 2009⁶, which itemise the key constraints that limit the potential for new development in this locality – most notably the landscape sensitivity of the eastern part of the SDA search area in the vicinity of Portsdown Hill (a concern recognised in the SEP) and the need to establish buffer zones between the SDA and existing settlements (such as Funtley). Land ownership presents a further constraint, particularly to the east of the A32: a study prepared for the Council⁷ queries the costs and likely success of a large scale land acquisition exercise using compulsory purchase powers.
 14. Furthermore, while the relevant caveat was not included in the approved SEP, the 10,000 dwelling figure identified for the SDA in the sub-regional strategy was originally put forward as a maximum figure rather than a specific requirement. This reflected the need for further work to be undertaken to develop the proposal in more detail. I have seen no evidence that, as a matter of principle (and subject to my detailed comments below about the proposed employment area at M27 junction 11), the scale of development now proposed would be at odds with the underlying rationale of the SDA in terms of self-containment and critical mass. SEP policy SH2 envisages that the other SDA proposed for South Hampshire (to the north and north-east of Hedge End) will comprise 6,000 new dwellings, while the relevant sub-regional evidence suggests that a development in the range of 5,000 to 10,000 dwellings would be sufficient to ensure a high degree of self-containment. This is consistent with the scale of the SDA as now proposed.
 15. It should also be noted that even the headline figures set out in the Core Strategy may be subject to further reduction. Consistent with SEP policy NRM5, Core Strategy policy CS13 provides for the potential to reduce the housing total in order to ensure that there are no adverse effects on the integrity of international nature conservation sites. As discussed further below, the Council has accepted (in consultation with the Highways Agency) that the achievement of the SDA's employment floorspace total (of up to 90,750m²) should be conditional on a detailed transport assessment being undertaken at the AAP stage.
 16. In addition, PUSH does not raise objections to the intended reduction of the SDA's size in respect of the possible implications for housing provision in the wider sub-region, and indeed has recently reduced its own expectations of the overall sub-regional housing requirement. Its refreshed Economic Development Strategy envisages a need for some 74,000 new homes in the period 2006-2026, compared to the 80,000 set out in the SEP. While the reduced figure has not been translated into Borough/District apportionments,

⁶ Prepared by David Lock Associates (Core Document references CE23 & CE56).

⁷ Prepared by DTZ (Core Document reference: CE42)

PUSH confirmed at the examination hearings that the revised scale of the North of Fareham SDA would not be likely to prejudice such an exercise.

17. Prior to its abolition, the South East England Partnership Board (the then regional planning body) expressed an informal view that "if the evidence demonstrates that 10,000 homes at the SDA cannot be delivered then there is unlikely to be an issue of general conformity in our opinion"⁸. Taking all of the above factors into account, I do not depart from that assessment.
18. While a significant amount of work has been undertaken to explore the SDA's transport implications, including capacity analysis of M27 junctions and a review of access options⁹, the Council accepts that modelling of likely traffic impacts has yet to be completed. Specifically, the Sub Regional Transport Model has yet to be calibrated and run. In order to reflect this uncertainty, it has suggested changes to policies CS5 and CS13, along with supporting text, in consultation with the Highways Agency (HA). These include the introduction of qualifications in respect of the overall scale of employment floorspace in the SDA (as mentioned above) and the need for a link road between the A32 and junction 11 of the M27. Subject to a further change that I recommend in respect of the proposed employment land at junction 11 (see below), I endorse these changes **[4.14, 4.18, 4.19, 5.27, 5.28, 5.31, 5.32, 5.36]** for soundness reasons. A further consequent change is required to delete the 'Proposed M27 Access' notation from the Key Diagram (which indicates a link between the A32 and junction 11): this is included in **IC3** (see below). Clearly, these are matters that will need to be resolved before the AAP can be finalised. However, the HA has confirmed that it does not see the above-noted modelling work as a pre-requisite affecting the overall soundness of the Core Strategy. Although I note the concerns raised by many parties about the SDA's potential traffic effects, I have seen no substantive evidence to cause me to disagree with the HA's assessment.
19. Policy CS13 proposes the location of employment uses near to junction 11 of the M27. This element of the SDA has emerged from the above-noted assessment of relevant constraints and opportunities. Its likely scale remains to be finalised. Nevertheless, it represents a level of detail that is at odds with the Core Strategy's treatment of the remainder of the SDA: matters such as the position of the SDA boundary, the nature and siting of transport infrastructure and the location of uses other than the junction 11 proposal remain to be considered at the AAP stage.
20. Furthermore, junction 11 is distinctly separate from the indicative location of the remaining body of SDA development – which broadly lies to the west of the A32. Existing road linkages (predominantly small rural lanes) are poor. Policy CS13's requirement to create a link road between this junction and the A32 is objected to by the HA on the grounds that the potential effects on the wider road network have been insufficiently modelled: as noted above, the

⁸ Email dated 28 August 2009 (Core Document reference: CE87).

⁹ Summarised in Core Strategy paragraphs 5.115 to 5.128.

Council proposes to reword the relevant reference. The Council emphasises that the junction 11 site would be linked to the remainder of the SDA by a proposed Bus Rapid Transit (BRT) system (although the full extent of this link is not shown on the Core Strategy's Transport Diagram) with additional cycling and walking routes. It proposes a change to the Core Strategy to emphasise this point. However, the proposed amendment is itself subject to a caveat regarding further detailed transport assessment as part of the AAP process. Bearing in mind that the details of the BRT system within the SDA (including its location and delivery mechanism) remain to be finalised at the AAP stage, it has not been demonstrated that the junction 11 site would be satisfactorily linked to the remainder of the SDA. This conflicts with the self-containment objective that underpins the SDA concept.

21. A number of other South Hampshire authorities have raised concerns about the possible implications of the junction 11 employment proposal on the development of town or city centre sites elsewhere in the sub-region. Policy CS13 requires the type of floorspace to be provided at this location to 'not directly compete for occupiers with floorspace developed in the city and town centres' and seeks to delay the implementation of this element of the SDA until 2021. However, this phasing requirement is subject to a caveat allowing development to go ahead if there is 'compelling justification for bringing it forward earlier'. The Council suggests additional text that gives an example of such a justification – namely where a major employer for which a suitable alternative site does not exist is wishing to locate in the sub-region. However, while such a change would provide some clarification, the suggested wording remains open to interpretation. Bearing in mind my comments above regarding self-containment, I am not satisfied that the Core Strategy (either as submitted or as proposed for amendment) would provide sufficient certainty that development of the junction 11 employment site would not harmfully affect the development of sequentially preferable sites in other local authority areas. This would conflict with national policy in Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS 4).
22. A further concern relates to the landscape sensitivity of the area around junction 11, which is located on the lower slopes of Portsdown Hill. An appraisal carried out for the Council¹⁰ identifies this land as being an area of high visibility and sensitivity: while two pockets of land are less prominent from some viewpoints, it is very likely that any employment development in this location would be highly visible. As such, the appraisal states that significant class B1 development (as is proposed in the Core Strategy) could only be accommodated if it is of the highest design quality. The landscape importance of Portsdown Hill is recognised in the SEP, which identifies the sensitive treatment of the SDA's relationship with Portsdown Hill as one of the critical success factors which are fundamental to the delivery of the SDA.

¹⁰ Prepared by David Lock Associates for Fareham Borough Council (Core Document reference: CE22).

23. The above-noted appraisal does not rule out employment development in this location on landscape and visual terms. Nevertheless, bearing in mind that areas of land of a lower landscape and visual sensitivity have been identified within the broad SDA area of search, the evidence base does not support the identification of junction 11 as a development location in advance of the more detailed consideration of other development sites – and, indeed, the finalisation of the overall SDA boundary – in the forthcoming AAP.
24. Taking these matters together, I conclude that the Core Strategy's proposal to site employment land around junction 11 is unsound as a result of not being justified and being inconsistent with national policy. These concerns would not be resolved by the changes that the Council has suggested in respect of this matter: these are not recommended and do not appear in the Appendix A schedule. To ensure soundness I recommend that the references to the M27 junction 11 employment proposal are removed from the Core Strategy (in **IC1-IC2**). A consequent change is needed to the Key Diagram and, bearing in mind that the boundaries of the SDA have yet to be finalised, it is also necessary to amend the legends of both the Key Diagram and Transport Diagram to clarify that the relevant notation is indicative only (in **IC3-IC4**).
25. I turn to address the remaining matters relating to the SDA. Although not a specific requirement of policy CS13, it is implicit from the capacity analysis exercises that the achievement of the stated level of housing delivery depends upon the location of some of the SDA's green infrastructure on land outside Fareham Borough Council's administrative area. The neighbouring local planning authority, Winchester City Council (WCC), confirmed at the relevant hearing session that while the location of built development or formal open spaces within this area would be resisted, the provision of green infrastructure along the lines presently suggested would be acceptable in principle. WCC is represented on the SDA Project Board and would be closely involved in the SDA's delivery. Therefore, while the proposed AAP is not proposed to extend into WCC's administrative area, there appear to be no significant barriers to the effective delivery of this part of the required green infrastructure.
26. Many of the other concerns raised by respondents in respect of the SDA relate to detailed matters that are more appropriately considered in the context of the AAP. Subject to a number of changes suggested by the Council to clarify the protection of international nature conservation sites and the provision of environmental and sewage infrastructure (included in **[5.36]**), which I endorse for soundness reasons, other relevant authorities identify no 'show-stoppers' sufficient to undermine the principle of the SDA proposal.
27. Accordingly, and subject to the changes set out above in respect of this main issue (notably the deletion of the unsound proposal to site employment uses around M27 junction 11), I conclude that the Core Strategy's proposals for the North of Fareham SDA are realistic, deliverable, adequately justified, consistent with sub-regional policy and in general conformity with the Regional Strategy.

Main Issue 2: Are the Core Strategy's approaches to the provision of new housing (excluding the North of Fareham SDA) and to meeting local housing needs deliverable, clear, sufficiently justified and consistent with

the local evidence base, regional and sub-regional policy, and national policy in PPS 3?

28. Core Strategy policy CS2 carries forward the rest-of-Borough housing total (outside the SDA) that is set out in the SEP and sub-regional strategy. As discussed above, the justification for the SDA derives from a sub-regional, rather than a Borough-based, housing need. I therefore reject the view that the proposed reduction in the SDA's likely housing yield from the 10,000 dwelling figure contained in the SEP should simply be added to the Core Strategy's rest-of-Borough requirement. Any reassignment of sub-regional housing requirements within the South Hampshire area is more appropriately considered at the sub-regional level.
29. Nevertheless, as already noted, the sub-regional housing requirement applying to the SDA will necessarily have a Borough-based component. It is therefore possible that, subject to further sub-regional analysis of housing provision and future refinement of the likely levels of housing delivery in the SDA through work on the AAP, the reduced scale of the SDA may imply an increased need for new housing in the remainder of the Borough. At present this cannot be quantified, and I agree with the Council that it would be both premature and lacking in justification to make such provision in the Core Strategy.
30. Bearing in mind that there is some flexibility in the Borough's housing supply position (outside the SDA) during the Core Strategy period – both in terms of a forecast over-provision in the housing trajectory and the lack of reliance on windfall sites – and noting the intention to review policy boundaries in the forthcoming Site Allocations and Development Management (SADM) DPD, it is possible that some or all of any increased housing requirement could be accommodated without altering the overall thrust of the Core Strategy.
31. However, the scale of any such change is by no means certain: a significant increase in housing numbers could imply the need for a more fundamental review of the Core Strategy's approach to housing provision outside the SDA. The Council's view (proposed as a suggested addition to policy CS6) that the provisions of policies CS1, CS2 and CS6 will enable future development needs to be met within the Borough, including those arising from a review of the South Hampshire Strategy, therefore lacks detailed justification and appears premature. I do not therefore recommend that this further change is made.
32. Nevertheless, based upon present figures, the evidence base indicates that the Borough has a robust five year housing land supply – a view endorsed by a recent appeal decision. While some parties have raised concern that the Council's Strategic Housing Land Availability Assessment (SHLAA) does not contain detailed assessments of sites lying outside the existing urban area, the document is sufficient to show in principle that the level of housing supply that is required by the Core Strategy (outside the SDA) can be achieved through the plan period. The Council suggests changes in order to bring SHLAA figures up to date **[4.4, 4.5, 4.9, 5.3, 5.7, 5.14, 5.15, A3.1]**, and proposes further changes in order to present the plan's housing totals in a more consistent and accurate way: the introduction of the qualifier "around" (where not already in place) reflecting the Council's position, stated at the relevant hearing session, that such housing totals are not intended as ceilings

[4.9, 5.6, 5.10, 5.12, 5.13, 5.17, 5.19]. Changes are also suggested to clarify the linkage between the Core Strategy and future development plan documents **[1.2, 5.8, 5.9, 5.16, 5.18]** – including references to the above-noted review of policy boundaries in the SADM DPD. I endorse all of these for soundness reasons.

33. Although some of the sites identified in the SHLAA have been assessed as having a higher potential risk of non-delivery, such a finding is to be expected given the need to plan for a 15 year period. As already noted, some flexibility exists within the housing supply figures. On the basis of the present sub-regional assessment of Borough-based housing requirements, the approach of the Core Strategy to seek to provide for new housing development (other than in the SDA) within existing urban areas is therefore justified. However, a more wide-ranging consideration of development options (including sites outside urban areas) may be required in future versions of the SHLAA – particularly if a review of the Core Strategy (as referred to above) is to take place.
34. In view of these factors the Council accepts that greater flexibility is required in the wording of policy CS6 and its supporting text. The sequential approach to housing development that is set out in this policy and its supporting text lacks clarity, while the evidence base does not support the hierarchy contained in the policy's penultimate paragraph. References to national policy in Planning Policy Statement 3: Housing (PPS 3) could also be clearer. I agree with the Council that a criteria-based approach, referring to established planning concerns such as dwelling mix, privacy and daylight, is a more appropriate alternative, and I endorse the changes that the Council has suggested **[4.6, 5.1, 5.2, 5.8, 6.1, A5.3]** for soundness reasons. However, detailed policy requirements in respect of these matters are more appropriately considered in the context of the SADM DPD.
35. Policy CS18 sets out the Core Strategy's approach to the provision of affordable housing. The proposed thresholds and targets have been the subject of viability studies, including a study specifically considering affordable housing delivery on small sites (five to ten units) – the methodology and findings of which have not been substantively challenged. The studies conclude that the policy would be achievable in many cases on the types of sites that are likely to come forward for development over the plan period. Policy CS18 provides for additional flexibility – both in respect of development viability and the need to take account of the potential effects of other planning objectives that may be sought from specific sites. While some respondents have questioned the scale of affordable housing needs in the Borough, the Council's Housing Needs Review 2004 (with subsequent updates) shows that this remains substantial (over 400 dwellings a year) despite recent falls in house prices. The plan's annual target of 100 dwellings, which the Council has clarified does not represent a ceiling, is both pragmatic and consistent

with the Council's Housing Strategy. On the basis of recent completion levels, it appears to be achievable in practice.

36. Concerns were raised by some respondents that insufficient provision is made in the Core Strategy for the housing needs of older people. This matter has been considered at a county-wide level¹¹, and the demographic pressures arising from an increasingly elderly population are recognised in the Core Strategy itself (for example at paragraph 2.22). Specific provision is identified at the strategic development allocation of Coldeast Hospital (policy CS10). However, detailed guidance in respect of non-allocated sites is more appropriately a matter for subsequent local development documents.
37. In relation to Gypsies, Travellers and Travelling Showpeople, policy CS19 seeks to provide guidance on both the allocation of sites in future DPDs and the consideration of planning applications for such proposals. However, the wording of the policy does not distinguish adequately between these two objectives. As a result, it sets out more stringent tests for planning applications in relation to Gypsies, Travellers and Travelling Showpeople than for other residential developments – for example including criteria in respect of land value and deliverability. This is contrary to existing national policy and to the emerging draft PPS on Planning for Traveller Sites. The Council accepts that a clearer approach is needed and has suggested revisions accordingly **[6.2]** – which I endorse for soundness reasons.
38. Subject to the changes set out above in respect of this main issue, I conclude that the Core Strategy's approaches to the provision of new housing (excluding the North of Fareham SDA) and to meeting local housing needs are deliverable, clear, sufficiently justified and consistent with the local evidence base, regional and sub-regional policy, and national policy in PPS 3.

Main Issue 3: Are the Core Strategy's approaches to employment and town centre uses (excluding the North of Fareham SDA) deliverable, clear, sufficiently justified and consistent with the local evidence base, regional/sub-regional policy, and national policy in PPS 4?

39. The Core Strategy's approach to employment provision outside the SDA is consistent with the floorspace targets set out in the SEP and sub-regional strategy. An error in the evidence base was identified during the examination and the Council proposes changes to the table in paragraph 4.9 accordingly **[4.1]**, which I endorse for soundness reasons. The amended data show that the potential surplus of class B1 floorspace is greater than previously envisaged, while that of class B2/B8 floorspace is less. However, in both cases, a significant potential surplus remains – mainly arising from completions since the start of the plan period, along with a number of existing commitments, notably at the Solent Business Park, Whiteley. As such, it is clear that the plan's employment targets (outside the SDA) are achievable, sufficiently justified and in line with regional and sub-regional policy.

¹¹ Hampshire Supporting People: Older Person's Services Strategic Review (Core Document reference: CE30).

40. Bearing the above-noted surplus in mind, it is important that the Core Strategy provides clear guidance on the potential for the re-use of suitable sites – consistent with national policy in PPS 4. It was explained at the examination hearings that, notwithstanding policy CS1's statement that existing employment areas will be safeguarded, the Council intends to review the need for certain employment designations through the forthcoming SADM DPD. This is not as clear as it could be within the Core Strategy, and I endorse the Council's suggestion that the intended review should be explicitly referenced in policy CS1 **[4.3]** for reasons of effectiveness. While a distinction can usefully be made between wider employment areas (which may contain a number of specific sites) and specific employment sites, the text of the Core Strategy (notably at paragraph 4.11) is confusing and potentially contradictory in respect of this matter. The Council proposes to reword this section and associated glossary references **[4.2, A5.1, A5.2]**, and I endorse these revisions as being necessary for soundness reasons. However, I agree with a number of representors that added clarity would be provided if a reference to the above-noted review is added to the reworded paragraph 4.11: for reasons of effectiveness, I recommend accordingly in **IC5**. The Council has advised that the inclusion of Local Plan policy E3 in the schedule of policies to be replaced by the Core Strategy is in error: this policy is intended for replacement by the SADM DPD. I recommend its deletion from Appendix 1 (in **IC9**), for reasons of effectiveness.
41. A number of representors consider that policy CS1 should allow for greater flexibility in respect of retained employment sites. However, the intended review of employment sites and designations is likely to allow for the re-use of those sites that are not retained in employment use. The Council's stance that alternative uses in areas that are retained for such use should be restricted to those activities that contribute to economic development is in line with the purpose of the relevant designation. The level of policy detail in respect of this matter is consistent with the role and purpose of a Core Strategy: further guidance or specific criteria, if needed, can be set out in the forthcoming SADM DPD. While economic development is not defined in the Core Strategy, there is little merit in repeating existing national policy.
42. Outside the SDA, the Core Strategy proposes employment development at the former HMS Daedalus airfield and in Fareham Town Centre. I have seen no substantive reasons to challenge the soundness of either proposal in principle, although the details of the latter remain to be tested in a forthcoming AAP. As such, I accept the Council's view that the additional comparison floorspace figure set out in policy CS8 and the table in paragraph 5.33 for Fareham Town Centre (of 20,000 sq m) is unduly prescriptive given (as is recognised in paragraph 5.33) that the exact figure will depend on other factors – notably its proposed location and the progress of planned large scale retail developments outside the Borough. Greater certainty in respect of these matters should be available at the AAP stage. Accordingly, I endorse the Council's suggested changes **[5.11, 5.12, 5.13]** for reasons of justification and effectiveness.
43. In respect of the Daedalus site, the Council proposes a number of changes to policy CS12, its supporting text and the Proposals Map in order to provide greater clarity **[5.20, 5.21, 5.22, PM1, PM3]**, which I endorse for soundness reasons. These include a clearer way of notating which designations are being

proposed for deletion and which are being added to the Proposals Map. This is necessary for reasons of effectiveness: a similar change is also suggested in respect of the mixed use development allocation at Coldeast Hospital (policy CS10) **[PM2]**, which I endorse for the same reasons.

44. No substantive concerns have been raised about the hierarchy of centres set out in policy CS3, which is consistent with regional and sub-regional policy. However, the policy's statement that development will be permitted provided that it enhances (as well as maintains) the current hierarchy is unclear: potentially, this introduces an unduly onerous policy requirement. The Council accepts this and proposes to delete the relevant reference **[4.11]**; I endorse this for soundness reasons. For the same reasons, I endorse the Council's intended deletion **[4.10]** of the table in paragraph 4.33 (and footnote) that contains floorspace figures derived from its retail and centres study¹²: this forms part of the evidence base and, as has been clarified by the Council, is not intended to form part of the policy itself.
45. Subject to the changes set out above in respect of this main issue, I conclude that the Core Strategy's approaches to employment and town centre uses (excluding the North of Fareham SDA) are deliverable, clear, sufficiently justified and consistent with the local evidence base, regional, sub-regional and national policy.

Main Issue 4: Does the Core Strategy take adequate account of the effects of development on the built and natural environment? Are its proposed measures to tackle climate change effective, justified and in line with national policy?

46. The Core Strategy has been subject to Habitats Regulations Assessment (HRA). An Appropriate Assessment has been undertaken in respect of likely significant effects that have been identified in respect of several international nature conservation sites: in summary, the HRA concludes that adverse effects (relating to atmospheric pollution, recreational disturbance and displacement effects of potential wind turbine development) can be overcome provided that recommended avoidance and mitigation measures are successfully adopted and implemented. Natural England (NE) and other representors have raised concerns that, in some cases, the Core Strategy does not contain the required safeguards – most notably in respect of references to mitigation for impacts on air quality due to road traffic and the degree of flexibility in the delivery of housing development outside the SDA. The Council accepts the majority of these concerns and, in consultation with NE and other representors, suggests revisions accordingly **[4.12, 4.13, 5.5, 5.8, 5.17, 5.36]**. I endorse these as being necessary for soundness reasons. NE suggests that additional clarity should be provided on the method and timing of a strategic approach on air pollution. However, given that such actions would need to be confirmed in co-operation with other local planning

¹² DTZ Fareham Retail and Centres Planning Study Update 2009 (Core Document reference: CE17).

authorities, the inclusion of further details at the present stage would appear to be premature.

47. Concern has been raised by a number of representors that policy CS22's protection of strategic gaps lacks adequate justification – particularly in view of the restrictive approach to development outside settlements set out in policy CS14. Nevertheless, given the built-up nature of much of Fareham Borough and noting that some of the Borough's constituent settlements are separated by relatively narrow open gaps, I accept the Council's argument that the broad identification of strategic gaps in the Core Strategy can play a useful role in guiding its intended review of settlement boundaries. Furthermore, and with reference to the Government's localism agenda, it is clear that there is strong local support for preventing coalescence between identified settlements. In principle therefore, the policy is adequately justified – although the detailed boundaries of the gaps themselves remain to be reviewed in the SADM DPD. The Council accepts that policy CS22 could provide clearer guidance for that review, and suggests that criteria be added in line with the PUSH Policy Framework for Gaps¹³ **[6.8]**. I endorse this change for soundness reasons.
48. Policies CS15, CS16 and CS17 contain targets and timescales in respect of sustainable construction, renewable energy production and Lifetime Homes that, in some cases, are in advance of those set by national policy. Both policies CS15 and CS16 are consistent with the sub-regional sustainability policy framework¹⁴, and it appears that, to date, relevant standards have been achieved in some developments within the Borough. Both policies are subject to a viability test. However, while the above-noted affordable housing viability study has taken account of the incorporation of improved standards over time, its assumptions in respect of the Code for Sustainable Homes relate to the national timetable rather than that set out in policy CS15¹⁵. In addition, it assumes that 10% of all new homes will meet the Lifetime Home standard, rather than the general requirement (from 2013) contained in policy CS17.
49. Furthermore, while some work has been undertaken on a sub-regional level, detailed evidence relating to the technical feasibility of implementing the sustainable construction and renewable energy provisions of policies CS15, CS16 and CS17 has not been submitted. For example, while an area of land to the north of M27 junction 11 has been identified as having on-shore wind potential, such potential has yet to be fully explored: indeed, as discussed above, the land use proposals for this area have yet to be finalised. Taking these matters together, the evidence base does not fully justify the detailed requirements of the relevant provisions of these policies. To my mind, these criteria are more appropriately framed as policy objectives rather than specific requirements. In order to comply with national policy in *Planning Policy Statement: Planning and Climate Change* (supplement to PPS1), I recommend

¹³ Core Document reference: CE54.

¹⁴ PUSH Sustainability Policy Framework (Core Document reference: HE035).

¹⁵ Housing Needs and Affordable Housing Viability Study (Paper 5; pp17-18) (Core Document reference: CE32).

that policies CS15, CS16 and CS17 are changed accordingly **[IC6-IC8]**. Change **IC8** partly supersedes a proposed Council change to policy CS17.

50. Subject to the changes set out above in respect of this main issue, I conclude that the Core Strategy takes adequate account of the effects of development on the built and natural environment and that its proposed measures to tackle climate change are effective, justified and in line with national policy.

Main Issue 5: Does the Core Strategy provide satisfactorily for the delivery of development, with particular reference to transportation infrastructure, and enable adequate monitoring of its effectiveness?

51. The transport issues arising from the North of Fareham SDA are discussed above under the first main issue. In respect of the remainder of the Borough, particular concern has been raised about access to and from the Gosport peninsula. This has been the subject of a specific study¹⁶: assessment has also been undertaken of the transport impacts of local development framework proposals in Fareham and three other local authority areas¹⁷. The Council accepts that the Core Strategy should provide more detail about works that are proposed to Newgate Lane, for which funding has apparently been secured. It proposes a factual clarification about the evidence base relating to the Stubbington bypass – a scheme that is not a Core Strategy proposal. I endorse its suggested changes **[4.15, 4.16, 4.18]** for soundness reasons.
52. While the transport effects of specific development proposals (or potential site allocations) would require to be assessed at the relevant stage along with other relevant criteria, I have seen no substantive evidence to support the views of a number of representors who suggest that the Core Strategy should support additional development in order to enable transport improvements to take place. Indeed, such an approach could potentially conflict with national policy in ODPM Circular 05/2005 Planning Obligations, paragraph B9 of which states (among other matters) that 'planning obligations should not be used solely to resolve existing deficiencies in infrastructure provision or to secure contributions to the achievement of wider planning objectives that are not necessary to allow consent to be given for a particular development.'
53. In respect of infrastructure provision generally, the Council suggests further changes to policy CS20 and its supporting text in order to accord more closely with the requirements of Circular 05/2005 – for example to include the possibility of the direct provision of infrastructure through the service provider (such as waste water providers). Updated references are also needed in respect of the Community Infrastructure Levy (CIL): a programme for the introduction of a CIL Charging Schedule is currently being developed by the Council. I endorse these changes **[6.3, 6.5]** as being necessary for soundness reasons. The Council accepts that there may be a need for

¹⁶ Strategic Access to Gosport (2010-2026) (Core Document reference: CE64).

¹⁷ Assessing the Impact of Harbour Authorities' LDF Proposals on the Strategic Highway Network (Core Document reference: CE69).

required infrastructure to be provided on land outside settlements, and proposes to amend policy CS14 accordingly **[5.37]**. Such added flexibility appears prudent, and I endorse this change for reasons of effectiveness.

54. In addition to the detailed provisions set out in specific policies and their supporting text, Appendix 4 of the Core Strategy contains a schedule of infrastructure requirements and delivery as at October 2010: this is referred to in the text of the Core Strategy as the Infrastructure Delivery Plan (IDP). During the examination, it became clear that the Council intends this to be a 'live' document that can be updated as circumstances change. However, while such flexibility is both useful and appropriate, it is inconsistent with the inclusion of such text within a DPD – given the formal procedures required for revision. The Council accepts this point and proposes that the schedule be removed from the Core Strategy to form a separately published IDP – with consequent changes to other parts of the Core Strategy's text **[1.1, 4.17, 5.33, 6.4, A4.1]**. I endorse these for soundness reasons.
55. Subject to the changes set out above in respect of this main issue, I conclude that the Core Strategy provides satisfactorily for the delivery of development, with particular reference to transportation infrastructure. While minor corrections are proposed to the monitoring framework set out in chapter 7 (see Appendix B of this report), I conclude that this is sufficient to enable adequate monitoring of the plan's effectiveness.

Legal Requirements

56. My examination of the compliance of the Core Strategy with the legal requirements is summarised in the table below. I conclude that the Core Strategy meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	At submission, the Council's Local Development Scheme (LDS), dated March 2009, envisaged the Core Strategy's adoption date to be October 2010. Significant slippage has occurred. However, the LDS was revised in May 2011 to take account of the actual dates for the Core Strategy's submission and hearings. The Core Strategy's content and timing are therefore compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2006 and consultation has been compliant with the requirements therein. While concerns have been raised about arrangements to publicise elements of the Core Strategy, notably the North of Fareham SDA, it is evident from the documents submitted by the Council, including the Regulation 30(1)(d) and 30(1)(e) Statements, that relevant statutory requirements have been met. The dates and venues of the hearings were published in the local press and posted on the examination website.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	An AA has been undertaken in accordance with the Habitats Directive. Subject to the changes set out above in respect of the 4th main issue set out in this report, I am satisfied that there would be no adverse effects on the integrity of any international sites of nature conservation interest as a result of the policies and proposals within the Core Strategy.
National Policy	The Core Strategy complies with national policy except where indicated and changes are recommended.
Regional Strategy (RS)	The scale of development proposed for the North of Fareham SDA represents a reduction from the figure set out in the South East Plan. Nevertheless, for the reasons set out in this report, the Core Strategy is in general conformity with the RS.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

Overall Conclusion and Recommendation

57. I conclude that with the changes proposed by the Council, set out in Appendix A of this report, and the changes that I recommend, set out in Appendix C, the Fareham Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act (as amended) and meets the criteria for soundness in PPS 12. Therefore I recommend that the plan be changed accordingly. And for the avoidance of doubt, I endorse the Council's proposed minor changes, set out in Appendix B.

M J Hetherington

INSPECTOR

This report is accompanied by:

Appendix A (separate document) Council Changes that go to soundness

Appendix B (separate document) Council's Minor Changes

Appendix C (attached) Changes that the Inspector considers are needed to make the plan sound

Appendix C – Changes that the Inspector considers are needed to make the plan sound

These changes are required in order to make the Core Strategy sound.

Inspector Change No.	Policy/Paragraph/Page	Change
IC1	Policy CS13; 3 rd bullet point	the development will provide up to 90,750 sq m of employment floorspace, in a range of employment opportunities which contribute to sub-regional economic development objectives including employment uses located near to Junction 11 of the motorway, and contribute towards creating a high level of self containment and accessibility to reduce the need for commuting; the employment land at Junction 11 will be phased to bring forward its delivery after 2021 (unless there is a compelling justification for bringing it forward earlier) to ensure that it is complementary to the PUSH Cities First Strategy, and is designed to ensure that the type of floorspace provided does not directly compete for occupiers with floorspace developed in the city and town centres;
IC2	Paragraph 5.89 (4 th bullet point); paragraph 5.101; paragraph 5.102 (1 st and 2 nd sentences); the phrase 'the main body of' in paragraph 5.103; paragraphs 5.104 to 5.106 inclusive; paragraph 5.107 (2 nd sentence); paragraphs 5.108 to 5.110 inclusive; paragraph 5.114; paragraph 5.136 (last sentence)	Delete
IC3	Key Diagram	Delete the following notations for the North of Fareham SDA: employment location near to junction 11; Proposed M27 Access. Delete legend stating Strategic Development Locations and replace with North of Fareham Strategic Development Area (indicative boundary) .
IC4	Transport Diagram (legend)	Add (indicative boundary) after 'North of Fareham Strategic Development Area (Local Development Framework)'

IC5	Paragraph 4.11	Add the following before the final sentence: Employment sites and areas will be reviewed through the Site Allocations and Development Management Development Plan Document, informed by the Employment Land Review.
IC6	Policy CS15: 2 nd bullet point	Meeting Seeking to achieve the following timescale and levels for the Code for Sustainable Homes and the equivalent for non-residential development unless it can be demonstrated to be unviable:
IC7	Policy CS16: last paragraph	Development (1 dwelling or more and 500m ² or more of non-residential floorspace) will be encouraged to contribute to the Fareham target of 12MW of renewable energy by 2020. Major developments (250 dwellings or more or 5,000sq.m or more of non-residential floorspace) must should aim to maximise on-site renewable energy production and resource efficiency. In such cases, t he extent of contribution should must be demonstrated, taking account of viability. The generation of energy from renewable or low carbon sources will be permitted unless there are judged to be unacceptable social, environmental or economic impacts.
IC8	Policy CS17: last bullet point	New housing should seek to achieve will be required to meet the Lifetime Home standard from 2013. Prior to 2013, the Council will encourage developers to meet the lifetime home standard having regard to the viability of the proposal.
IC9	Appendix 1	Delete policy E3 from list of saved Local Plan policies replaced by the Core Strategy.

APPENDIX 3

REVIEW OF GAP POLICY DESIGNATIONS REPORT, 2012



Fareham Borough Gap Review.

A review of gap policy designations.

Prepared for Fareham Borough Council October 2012

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Whilst we acknowledge the assistance of other people and organisations, this report represents the views of David Hares Landscape Architecture alone.

David Hares
Lynnette Leeson

David Hares Landscape Architecture
October 2012

1. INTRODUCTION

1.1. Background to the project

This report has been commissioned by Fareham Borough Council to assist with the preparation of the Fareham Borough Local Development Framework (LDF).

The Council commissioned a review of gap policy designations to assist with the preparation of its Site Allocations and Development Management Development Plan Document (SADM DPD). A review of the extent of the gap policy designations is required to support the evidence base underpinning the SADM DPD.

The review has been undertaken as part of the process of preparing the LDF and follows on from the adoption of the Core Strategy¹ in August 2011. This followed a public examination between 28 February 2011 and 20 July 2011. Both the inspector's report and the Core Strategy refer to the need for a review of the strategic gap policy designation, and this report forms that review. New national guidance in the form of the National Planning Policy Framework (NPPF) (issued in March 2012, shortly after this report was commissioned) is changing the planning process. This review of the gap policy is still relevant to the production of a sound new local plan under the new planning regime.

1.1. Brief

The brief for the study follows recommendations in the Core Strategy Policy CS22 (Development in Strategic Gaps) which states that:

'Their (Strategic Gap) boundaries will be reviewed in accordance with the following criteria:

- *The open nature and sense of separation between settlements cannot be retained by other policy designations;*
- *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.*
- *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.'*

The brief also required that the review should analyse the functionality of strategic gaps in providing physical and visual separation between settlements and should consider the prevention of coalescence between settlements and urban areas within Fareham Borough and in neighbouring authorities.

The brief also referred to the need for an evaluation of Policy C12 (Local Gaps) from Fareham's Local Plan Review (2000) as follows:

- *The Core Strategy does not identify the Local Gaps as a strategic requirement or provide a context for them. However, the evaluation of the Local Gap policy is required to establish whether the continuation of this designation is required and justified or whether other designations are sufficient to fulfil the role of this policy.*

A complete copy of the brief can be found at Appendix I.

1.2. Strategic and local gaps

Strategic and local gaps are spatial planning tools designed to shape the pattern of settlements. They command wide public support and have been used with success in structure and local plans to maintain the separation of settlements in South Hampshire.

The function of strategic gaps and local gaps are principally to define and maintain the separate identity of settlements. Gap policy needs to define clear robust boundaries to prevent coalescence of urban areas and protect the character of individual settlements. The open land protected by the gaps, due to its proximity to the adjoining urban areas, can also provide vital secondary green infrastructure benefits.

The Partnership for Urban South Hampshire (PUSH) which is a joint collaborative local authority working group, produced a *Policy Framework for Gaps* in December 2008². This defined the location of the gaps which crossed local authority boundaries. The plan at Illustration 1 shows the current distribution of local and strategic gaps based on the Fareham 2000 Local Plan Review.

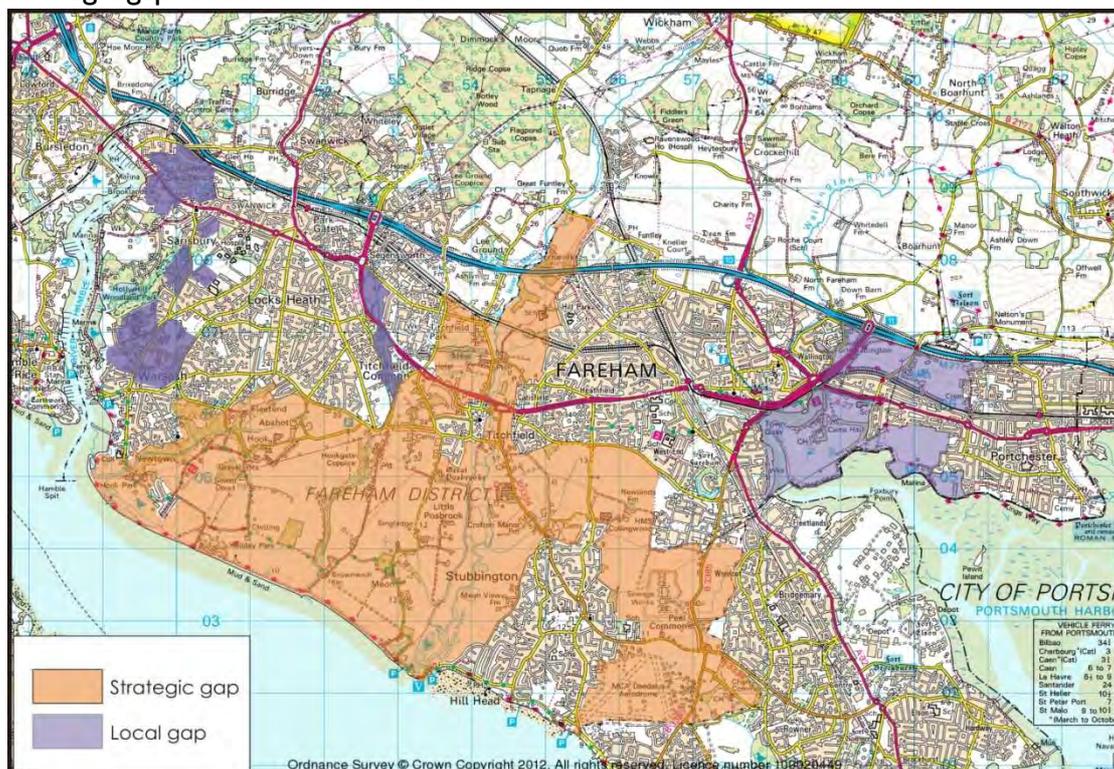


Illustration 1: Areas designated as strategic and local gaps in the 2000 Local Plan Review.

1.3. The nature of the policy

Strategic and local gaps are an essential local planning designation, which have been a feature of county and district planning documents for over thirty years. They are most common in the south east of England, which often reflects the combination of highest development pressure, and the relatively close settlement pattern in this more highly developed part of the UK. Research by Oxford Brookes University in 2001³ identified some 17 counties with similar policies.

Gap designations are intended to increase the level of restraint on development over and above the level of restraint which is imposed by normal countryside policies. Although similar to green belt policies there are certain differences, principally that they do not have the national status of green belt designations.

1.4. Approach

Our review of the strategic and local gap areas focussed on a survey and analysis of the countryside within the borough and whether it met the Core Strategy Policy CS22 criteria to be designated as gap. This was firstly assessed in the field using a structured method, based on the completion of a survey pro forma. This information was subsequently analysed in association with other relevant information using an analysis matrix to assess both the suitability of land for inclusion within a gap, and the broad level of functionality which the land provided in relation to the gap criteria.

2. FAREHAM BOROUGH

2.1. Settlement

Fareham Borough is one of the smaller districts in Hampshire extending to a total of some 75 square kilometres. It is located on the south coast between Southampton to the west, and Portsmouth and Gosport to the east, with the M 27 motorway and south coast rail line running through the borough. The borough had a population of nearly 108,000 at the time of the 2001 census, split between the 15 wards which each have a population of some 7000 people. Geographically the population is spread between three main areas, Fareham, Stubbington/Lee on Solent, and the group of 'Western Wards'; a group of expanded villages, which include Sarisbury, Lower Swanwick, Park Gate, Locks Heath, Warsash and Titchfield Common.

2.2. Geology

The borough is located over a series of sands and clays which were deposited on top of chalk strata which dips down towards the south below the coast. These relatively recent deposits include London Clays (below Fareham and Portchester), Plateau gravels (below the Western Wards and Lee on Solent), Bracklesham Beds (to the south of Fareham), and alluvial deposits (in the Meon and Hook Lake valleys).

2.3. Topography and drainage

In general, the borough slopes gently southwards from higher ground on the northern boundary above the chalk deposits, which lie at up to 40 metres Above Ordnance Datum (AOD), down to the coast of the Solent. There are two major north/south rivers which flow through the borough, the Hamble, which forms the western boundary of the borough, and the River Meon, which separates Fareham from Titchfield and the Western Wards.

2.4. History of growth

The Roman fort at Portchester was converted into a medieval castle in the 12th century, and Titchfield Abbey was founded shortly afterwards. The medieval open fields belonging to the small villages and towns were subject to enclosure during the 13th and 14th century, with Titchfield Abbey being a major landowner. The dissolution of the Abbey occurred in the 16th century, and by the 17th Century the river mouth of the Meon was silting up, and Titchfield's period as a port was brought to an end. This was due to the closure of the river mouth as part of a land reclamation project for the valley.

The 18th and 19th centuries saw the enclosure of the remaining open fields, and the growth of the town of Fareham, linked to the prosperity of its port, and related industry. Many of the buildings which form the core of the borough's conservation areas were constructed at this time, as were various mansions built for wealthy landowners, including Cams Hill, Holly Hill, Brooklands, Hook and Cold East.

The coming of the railway to the area in 1841 and the enclosure of the last areas of common stimulated the horticultural industry and in particular the growth of strawberries. These were ideally suited to the gravelly soils around Titchfield Common, Locks Heath, Warsash and Sarisbury, and by the 1880s, the industry was so well established and productive that it was able to arrange for a station to be built at Swanwick to carry the crop to Convent Garden on 'strawberry special' trains. Whilst the scale of the industry has changed, and many of the former strawberry

fields have been built over, there remains a considerable amount of horticultural cropping in the area, particularly on land south of Locks Heath and Titchfield which is located within the strategic gap. Other local gap areas include both active and redundant horticultural plots growing under glass, poly-tunnels and plastic. The economics of glasshouse cropping have changed, and certain areas within the Warsash-Salisbury local gap are blighted by derelict glasshouses.

Urban growth since the First World War led to the rapid expansion of the towns and villages, and the merging of a number of formerly separate settlements, these include:

- Fareham with Catishead;
- Stubbington with Crofton and Hillhead;
- Salisbury, Lower Swanwick, Park Gate, Locks Heath with Warsash and Titchfield Common.

There has inevitably been a change in the character of these settlements, and a loss of their individual identity as the open spaces have been lost, which once separated the settlements. Other development during the 20th century has included the growth of the defence establishments (HMS Collingwood, and the airfield at HMS Daedalus), mineral extraction, and subsequent land-filling in parts of the coastal plain, near Abshot and the establishment of the Solent Breezes caravan park on the coast near Hook.

The construction of Fawley power station on the edge of the New Forest led to the installation of a network of National Grid power cables and pylons across the study area which cross under Southampton Water before coming above ground close to the Solent Breezes caravan park, and spreading north and east.

Land both within and to the west of the Meon Valley at Chilling was purchased by Hampshire County Council in the 1970's to establish the Titchfield Haven National Nature Reserve. Other areas of countryside located within the gaps are owned and or managed by the county council, these include:

- Kites Croft
- Warsash Common
- The Hook

2.5. Landscape

The landscape of the borough is fully described in a series of landscape character assessment reports which have been produced by both Hampshire County⁴ in 2010 and Fareham Borough⁵ Council in 1996. Landscape character assessments are designed to 'nest' from the wider scale national and regional assessments down to the county and more detailed district scale assessments. Whilst the 1996 detailed Fareham Borough assessment is now some 16 years old, the method used and the conclusions are still very relevant today, although recent developments have affected some of the mapping. This document has been a major source for this study in that the subdivisions of the study area which have been used for the gap study are based on the rural landscape types identified in the character assessment (see Illustration 2).

2.6. Designations

Nature conservation designations include the Titchfield Haven National Nature Reserve, which is also partly Site of Special Scientific Interest and Special Protected Area (SPA). The section of coastline between Lee on Solent and Warsash is also a part of the same Solent SPA and Ramsar site which includes Hook Marshes and associated inland woodland areas.

The land in the borough which is liable to flooding has been identified by the Environment Agency, as being either liable to flooding on a 1-100 year (zone 3) basis or a 1-1000 year (zone 2) basis. Key areas which are liable to flood are the Meon Valley, the Hook valley and parts of the Hamble and River Wallington.

3. Planning policy

3.1. National policy

The publication of the National Planning Policy Framework (NPPF) in March 2012 sets out the current Government's planning policies for England and has changed the national planning policy landscape.

It is noticeable that strategic gaps do not appear to be mentioned in the NPPF. It does however recognise the intrinsic value of the ordinary countryside:

‘.....the need to protect and enhance ‘....valued landscapes’

(paragraph 109).

The principle of countryside protection has been incorporated into the NPPF as one of twelve core principles for planning (paragraph 17)

Planners must;

“take account of the different roles and character of different areas....recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.”

and

“Conservation and enhancement of the natural and historic environment, including landscape” is a strategic priority for local plan making.

A major principle of the NPPF is the presumption in favour of sustainable development. However it cannot over-ride designations and policies that otherwise restrict development. e.g. NPPF cites SSSIs, Green Belt, Local Green Space, AONBs, Heritage Coasts, Birds Habitat Directive sites, National Parks, Broads Authority, designated heritage assets, and locations at risk of flooding or coastal erosion. The NPPF does not cite local landscape and wildlife designations or unprotected countryside for not saying “yes” to sustainable development.

Nevertheless, it is interesting to note that the NPPF also states that:

‘Local plans should identify land where development would be inappropriate, for instance because of its environmental or historic significance; and contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified’(paragraph 157).

The NPPF also supports planning strategically across local boundaries.

It states:

‘local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly co-ordinate and clearly reflected in individual Local Plans’ (paragraph 179).

and

‘Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities’ (paragraph 178).

The Government also attaches great importance to Green Belts in the NPPF. The relevance of green belt policy in relation to the Strategic Gap study will be discussed in paragraph 7.1

The NPPF also introduces the new concept of Local Green Space which again will be discussed later in relation to the review of Local Gap Policy.(sections 9.3 and 9.9)

3.2. Regional policy

The South East Plan, which was adopted in May 2009,(but is soon to be revoked) contains various policies on sustainable development, green infrastructure and policies relating to South Hampshire. The plan acknowledged the justification for the designation of gaps as follows:

“South Hampshire has a dense and complex settlement pattern, and accommodates a population of nearly a million people. Within the urbanised parts of the sub-region, there are substantial areas of undeveloped land. If local authorities in South Hampshire consider the inclusion of local gaps as essential in terms of shaping the settlement pattern, this policy approach will need to be tested through Development Plan Documents. (paragraph 16.6)”

In the NPPF there is support for using evidence and guidance from regional strategies. Consequently the use of criteria set out in the regional PUSH Gap Policy Framework aligns with the NPPF.

3.3. Sub Regional Policy

The Partnership for Urban South Hampshire (PUSH) has produced a series of reports, guidance and policy frameworks to assist spatial planning in South Hampshire. The reports and policy frameworks provide the context for detailed policies and proposals in individual Local Development Documents within the overall regional policy framework set out in the South East Plan. Even though the South East Plan is soon to be revoked, the PUSH policy frameworks still provide guidance for the preparation of Local Development Frameworks in South Hampshire including Fareham Borough.

A Policy Framework for Gaps has been prepared by PUSH to ensure there is a consistent approach to the designation of sub-regional gaps in the preparation of LDFs across South Hampshire. PUSH prepared a policy on sub-regional gaps and a list of areas to be considered as sub-regional gaps to be included in the South East Plan. The policy framework sets out criteria to guide LDFs in designating gaps, and also identifies the location of cross-boundary gaps. In Fareham Borough two sub-regional or strategic gaps were identified between Fareham/Stubbington and Western Wards/Whiteley (the Meon gap) and Stubbington/Lee on Solent and Fareham / Gosport.

In order to ensure consistency across South Hampshire and to avoid the proliferation of gaps that may restrict sufficient land being made available for employment and housing development, criteria were set out to be used by local planning authorities to designate strategic gaps.

These criteria were encompassed in Policy CS22 of the Fareham Borough Core Strategy.

The Strategic Gap Policy Framework Guidance states:

" Local Development Documents will identify the location of the gap(s) and include a policy and ancillary documentation setting out the types of development which will be permitted within the gap(s) based on the principle that development within Gaps:-
 a) would not diminish the physical and/or visual separation of settlements; and
 b) would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap. "

The designation of a gap therefore does not completely preclude development. Proposals which would not adversely affect the function of the gap and which would otherwise be acceptable in planning terms could be permitted. However the cumulative impact of a number of even small scale developments could have a significant impact on the sense of separation between settlements and would be a consideration in the decision making process.

The guidance also states:

"In considering the future planning of the land within defined gaps, the local planning authorities should also consider opportunities for the positive uses of the land within the gap to meet wider planning objectives, such as provision of green infrastructure, although these objectives would be secondary to the primary objectives of separating settlements."

The PUSH strategic gap guidance was closely followed in this review of gap policy.

3.4. Local Policy

Fareham's Core Strategy was adopted in August 2011 and sets out the planning framework for the Borough up to 2026. The Core Strategy Policy (CS22) sets out the policy for Strategic Gaps which supersedes the previous strategic gap (Policy C11) contained in the Local Plan review (2000). The existing Strategic Gap Boundaries as delineated on the Proposals Map (June 2000) remain in effect until they are replaced through the SADM DPD. Core Strategy Policy CS22 commits the Council to a review of the boundaries of Strategic Gaps through the preparation of the SADM DPD. The relevant Core Strategy policies are set out in section 3.7 of this report.

Strategic gaps of sub-regional importance were originally identified in the Hampshire Structure Plan, and later included in PUSH guidance, local gaps were defined by the Fareham Borough Local Plan Review (2000) as being other gaps of more local importance.

3.5. Strategic Gaps

In the PUSH Policy Framework for Gaps four cross authority sub-regional gaps were identified. Two specifically affect Fareham Borough:-

The Meon gap between Fareham and Fareham Western Wards/Whiteley

The designation of the Meon valley as a strategic gap has prevented coalescence and maintained open countryside between Fareham and the Western Wards over the last twenty years. It was first identified in the Fareham Borough Local Plan (1992) and the Hampshire County Structure Plan (1994)

The Meon gap includes the predominantly open and undeveloped countryside along the river Meon valley starting from the coast, enclosing Titchfield and then running north to the Borough boundary to the west of Funtley. The strategic gap extends to

the north west into Winchester District to include land on the western side of the Meon valley. The strategic gap also extends to the south east in Gosport Borough along the Alver valley.

The land which is mainly used for agricultural purposes has been successfully protected from inappropriate development maintaining the separate identities of Fareham, Titchfield and the western ward settlements.

The gap between Fareham/Gosport and Stubbington/Lee-on –Solent

This strategic gap to the south of Fareham has been and continues to be under intense development pressure. It includes the Daedalus Airfield Strategic allocation development site and is adjacent to the proposed new enterprise zone.

The strategic gap includes predominantly open and undeveloped land, which is mainly in agricultural use, between Fareham and Stubbington and Stubbington and Gosport. Other land uses include Peel Common Waste Water Treatment Works, HMS Daedalus Airfield, playing fields, restored waste land and a golf course.

3.6. Local gaps

Local Gaps are identified in the Borough between Lower Swanwick and Sarisbury in the west; separating Sarisbury, Warsash and Segensworth from the main residential area of Locks Heath; and separating Fareham and Portchester.

Local gaps are important areas of undeveloped land between the individual settlements in Fareham Borough. They are not of regional importance but were designated in the Fareham Borough Local Plan Review (2000) to protect the identity of some settlements by preventing inappropriate development and stopping their coalescence. Local Gap Policy C12 was included in the Fareham Borough Local Plan but was not reviewed in the preparation of the Core Strategy.

Local Plan Review Policy C12 Local Gaps

States that:

‘Development that would physically and/or visually diminish the undeveloped land in the following gaps will not be permitted:’

Lower Swanwick-Sarisbury; Sarisbury-Locks Heath; Warsash-Locks Heath; Segensworth-Locks Heath; Wallington-Portchester and Fareham Portchester.

The Local Gap Policy (C12) and Proposals Map designation continues to be saved under Government Direction (September 2007) and remains part of the development plan for Fareham Borough. The supporting text to Policy C12 indicates that there has already been partial or total coalescence of some settlements and the local gaps provide protection from inappropriate development in order to maintain the separate identity of smaller settlements.

3.7. Core Strategy Policies which are relevant to gap areas

Core Strategy Policy CS22 states a review of the detailed boundaries of Strategic Gaps should be undertaken in line with the criteria set out as follows:

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.

Numerous other policies in the Fareham Core Strategy are relevant to this study e.g.CS4, CS6, CS9, CS11,CS14,CS16. The following development policies within the adopted Core Strategy would assist the delineation of settlement and gap boundaries.

CS6 The Development Strategy policy

This policy limits development to within the existing settlement boundaries. Development will be focussed in Fareham, the Western Wards and Whiteley, Portchester, Stubbington & Hillhead and Titchfield and Strategic Development Locations.

CS9 Development in the Western Wards & Whiteley

This states that:

Development will be permitted within the Western Wards and Whiteley settlement boundaries where it :-

- Protects the setting of the settlement;
- Protects their natural, historic, biodiversity and cultural resources;
- Contributes to the provision of green infrastructure;
- Maintains and strengthens the character, vitality and viability of district and local centres;
- Contributes to the following small levels of residential and employment development.....

CS11 Development in Portchester ,Stubbington & Hillhead and Titchfield.

This states that:

Small scale development will be permitted within the settlement boundaries of Portchester, Stubbington & Hillhead and Titchfield where it;-

- protects their setting and the natural, historic biodiversity and cultural resources.....(as above)..

Although these policies do not specifically refer to visual and physical separation of individual settlements they do safeguard their setting and natural and cultural resources.

The following Core Strategy policies will also assist in the protection of gap areas.

CS14 Development Outside Settlements

‘Built development on land outside the defined settlements will be strictly controlled to protect the countryside and coastline from development which would adversely affect its landscape character, appearance and function. Acceptable forms of development will include that essential for agriculture, forestry, horticulture and required infrastructure. The conversion of existing buildings will be favoured. Replacement buildings must reduce the impact of development and be grouped with other existing buildings, where possible. In coastal locations, development should not have an adverse impact on the special character of the coast when viewed from the land or water.’

The core strategy concentrates development within the existing urban areas and strategic sites. Areas outside the settlement boundaries are therefore strictly controlled with development in the countryside only being permitted to meet the needs of agriculture, farm diversification, countryside recreation, leisure and tourism. Where such development is proved necessary in this location priority is given to protect and enhance landscape character, the setting of settlements and biodiversity.

CS16 Natural Resources and Renewable Energy

The Borough has strong sustainable development policies and new development will be expected to safeguard the use of natural resources. Policy CS16 makes particular reference to the protection of mineral resources from development and the safeguarding of good quality and versatile agricultural land. Existing strategic and local gap areas encompass large areas of high grade agricultural land and in the south west of the Borough protected land for mineral extraction.

CS4 Green Infrastructure, Biodiversity and Geological Conservation

Protection of the natural environment in the Borough is covered in policy CS4. This is an all encompassing policy which includes relevant statements on the planning and protection of green infrastructure and the protection and enhancement of nature conservation, areas of international importance, national and local nature reserves and local sites of nature conservation value. Specifically in regard to green infrastructure it states:-

‘...Green Infrastructure will be created and safe guarded through:

Investing in appropriate management, enhancement and restoration, and the creation of new resources including parks, woodland and trees, and wildlife habitats;

Not permitting development that compromises its integrity and therefore that of the overall green infrastructure framework.’

A substantial part of the areas currently covered by strategic and local gap designations can be considered as essential to the green infrastructure network of the Borough. The Fareham Green Infrastructure Strategy will identify the details of the network following on from the PUSH GI Strategy which sets out the sub-regional spatial framework for green infrastructure and guidance from the South East GI Partnership. The Fareham GI Strategy will be implemented through the Site Allocations and Development Management DPD.

3.8. Gap Policies of Neighbouring Authorities

In the PUSH Policy Framework for Gaps it is recommended that a co-ordinated approach to strategic gap designation is taken to ensure sub regional gaps are aligned across administrative boundaries. PUSH stated that gaps should be designated in Local Development Documents and identified four cross authority gaps. Two specifically affect Fareham Borough, Winchester District and Gosport Borough.

Between Fareham and Fareham Western Wards/Whiteley
Between Fareham/Gosport and Stubbington/Lee-on-Solent

Both Gosport Borough and Winchester District Councils have policies for protecting strategic and local gaps in their current development planning documents. They are also reviewing these policies during the preparation of their Local

Development Frameworks. Both local authorities will use the PUSH guidance in relation to designating the boundaries of gaps within their administrative areas. They are however, at different stages in the process of preparing core strategies and development documents.

Gosport Borough have prepared a draft core strategy but following the publication of the NPPF have decided to convert it into a local plan directly and include the work on the core strategy with the site allocation document. This will bring it in line with the NPPF and hopefully a draft will be ready for consultation in the autumn.

Winchester District Council has prepared their core strategy and were about to submit it to government just before the NPPF was published. They are currently in discussion with the Planning Inspectorate on the way forward.

3.9. Approach to Reviewing Strategic and Local Gaps

This review is looking at the functionality of strategic and local gaps and the need for the retention of both gap designations. The following sections describe the methodology used to assess the functionality of the gap area across the study area.

4. Methodology

4.1. Existing studies

The evidence base for the current development plan documents includes a number of relevant background documents which were prepared as part of the adopted Core Strategy. These have been used as source material where relevant to supplement the Fareham Borough Landscape Character Assessment referred to earlier.

The relevant studies used include:

- Fareham Borough Greenspace Study;⁶
- Fareham Local Biodiversity Action Plan Review August 2008⁷
- PUSH Green Infrastructure strategy and appendices July 2010
- PUSH Strategic Flood Risk Assessment
- SE Green Infrastructure Framework
- Fareham Allotments study
- Fareham Playing pitch Assessment Strategy
- Fareham Settlement Profiles study
- Strategic Housing Land Assessment SHLAA⁸

4.2. Analysis of existing gaps

The existing strategic and local gap areas formed the initial study area for the project. The land within the strategic and local gaps provides a range of services from land drainage and recreation to food production and nature conservation. However the primary functions or services which are being analysed by this study relate to gaps as a planning designation. Therefore the study seeks to assess whether the existing designated gap areas are required to ensure the visual and physical separation of settlements (including the settlement character) in the Borough. In addition as a secondary consideration, the study also considered the value of other functions such as green infrastructure which might be lost if development occurred on land which is currently designated as gap.

4.3. Site Survey

In order to assess whether the current gap designation should be retained, the study has analysed a series of criteria. These include an analysis of the inter-visibility of the settlements which the gap is seeking to keep separate, assessment of the sensitivity of the landscape within the gap, and evaluation of the green infrastructure services (public access, recreation, wildlife etc) which the gap provides. These have been attributed values on a five point scale from high to low as part of the analysis of each individual area. The assessment and valuation process has used the subdivisions of the area taken from the 1996 Fareham Landscape Character Assessment, which subdivided the borough into a series of different areas based on landscape character. The boundaries of the individual character areas are shown on the mapping at Illustration 2. A total of 34 different sub areas were generated by using this approach, which reflects the changes in the nature of the countryside within the gap, and the presence or absence of features such as screening vegetation, which is one of the major factors which affect the inter-visibility between settlements.

A site survey was undertaken to assess these various parameters using a survey pro-forma as an aid to the recording of relevant data. An example of a completed pro-forma is to be found at Appendix 2. The pro-forma's recorded information which

was apparent on site and was subsequently used as part of the analysis of the main criteria to assess the gap. These were:

Physical and Visual separation

Settlement character and landscape sensitivity and

Green infrastructure value.

5. Physical and Visual Separation

5.1. *Inter-visibility*

Policy CS22 refers to the way in which the strategic gap designation is intended to help to retain the open nature and sense of separation between settlements, to define the settlement character of the area, separate settlements and maintain their physical and visual separation. Clearly therefore to identify whether the gap is currently being effective in separating settlements, it is necessary to consider whether it is possible to see between the settlements, and whether the countryside between the settlements is 'open' in planning terms which means largely free from buildings.

5.2. *Topography*

Elevated land is more likely to be visible from surrounding areas, hence the topography of the settlements and intervening areas is important. In the case of the Fareham Borough strategic gaps there are height differences across one of the key parts of the Meon gap, between Fareham and Titchfield, with the western edge of Fareham being some 20 metres above the eastern edge of Titchfield. Similar topographical variation occurs across the Sarisbury/ Swanwick local gap. In both cases the presence of trees within the gap generally prevents the inter-visibility which might otherwise compromise the functionality of the gap.

5.3. *Structures vegetation and field boundary patterns*

Trees and woodland /copses help to prevent views across a gap between settlements, particularly when the area is broadly flat. Whilst physical separation is not affected, in a wooded landscape, or a landscape with a dense pattern of tall hedges, visual separation of settlements can be achieved within a much reduced distance compared to a more open landscape.

5.4. *Urban edge character and typology*

The character of the urban edge can affect the manner in which settlements are visible across a gap. Settlement edges formed by a well established hedgerow are less obvious than those in which the buildings are prominent. We have therefore categorised the urban edges adjoining the gaps in accordance with a standardised typology to reflect the likelihood of the urban edge being either more or less visible. The edges of new housing are often more visible than older housing stock as a result of garden tree planting, which has helped to screen the older properties adjoining the gap. Properties which back onto woodland have the most robust edge to the gap, as is the case for example at Warsash, where trees on the Common provide a strong edge and screen housing from the gap. In other locations the interface between housing and gap is formed by a road. In these situations roadside hedging to either side of the road can help screen the roadside housing from the gap. As an example of this, the southern edges of Fareham are well screened from the south by a densely planted roadside tree belt, which provides a significant visual screen to the housing areas to the north. Details of the different types can be found at illustration 3, and these have been mapped according to the effectiveness of the edges in screening the urban boundary on mapping which has been included as illustration 4. This shows how there are relatively strong and effective edges to quite a high proportion of the interface between Fareham and the Stubbington/ Titchfield gap,

but that there are parts of Titchfield, Hillhead and Titchfield Park , where the interface between the developed area and gap are not as strong.

5.5. Analysis

The analysis of the visual separation of the settlements has been undertaken on the area basis as described earlier. This was undertaken by combining the survey findings, and desk findings onto an analysis matrix. An example of the characteristics and how they were assessed is shown on the example analysis matrix at illustration 5

5.6. Physical separation and spatial arrangement of gaps and settlements

The mapping at Illustration 6 shows the spatial arrangement of the settlements which are affected by the main strategic gap designation. The physical distances separating the settlements are clearly an important factor in determining both the need and the effectiveness of the gap designation. The map shows the distances across the gaps between the key settlements at their closest points. The gap between Lee on Solent and Stubbington across HMS Daedalus, and the gaps between the Fareham, Titchfield and the Western Wards are the narrowest and therefore potentially most vulnerable to coalescence. In policy terms therefore these are key areas which the strategic gap designation is seeking to keep separate. The width of the Meon gap varies between 0.3 and 1.1 kilometres, whilst the width of the Fareham /Stubbington gap varies between 0.57 and 1.1 kilometres.

6. Settlement Character & Landscape sensitivity

6.1. Landscape character

The Fareham Borough Landscape Character Assessment (1996) has been used as a basis for the survey and analysis of the strategic and local gaps. Strategic gaps are intended to help protect the special character of the settlements which are to be protected from coalescence. Consequently the character of the landscape / townscape of the settlement edges is an important factor to be considered in assessing the quality of land in relation to gap functionality. This is particularly important where the edges interface with one of the designated conservation areas, which either coincide with or abut a gap. The conservation areas are listed on table I.

Swanwick Shore Conservation Area	Abuts Swanwick local gap
Sarisbury Green Conservation Area	Overlaps Sarisbury local gap
Hook Conservation Area	In Titchfield/ western wards strategic gap
Titchfield Abbey Conservation Area	In Meon strategic gap
Titchfield Conservation Area	Abuts/ overlaps Meon strategic gap
Cams Hall Conservation Area	Coincides with Portchester Local gap

Table I Conservation areas

6.2. Sensitivity to change

The mapping at illustration 7 shows the situations where conservation areas and gap designation overlap. The Titchfield and Titchfield Abbey conservation areas are located within and across the Meon Gap at its narrowest point. This particular area is consequently one of the most sensitive areas to change. This is reflected in the matrix analysis of the individual areas which coincide or adjoin these areas(see appendix 4).

6.3. Future threats

Much of the countryside within the borough appears to be subject to the types of development or landscape pressures which are common on the edges of towns. Urban fringe pressures reflect modern demands for space, recreation and enterprise spreading into the countryside causing deterioration in the quality of the landscape. For example, this includes the subdivision of agricultural land for horse or pony paddocks, and the associated stables and parking of horse boxes, or the short or long term parking of caravans or mobile homes. In some cases illegal tipping and the construction of hard paved areas is associated with these sub-divided areas of urban fringe. These problems are often exacerbated in locations where the land ownership pattern is complex, as a result of the past history of horticultural enterprises. For example, in the Western Wards the land is subdivided into many small plots, which have derelict glasshouses or scrub, here the countryside has almost deteriorated to a point where it is no longer viable as agricultural land. This makes it vulnerable to development pressure.

6.4. Analysis

The analysis of the settlement character and landscape sensitivity of gap areas has been undertaken on the area basis as described earlier. This was undertaken by combining the survey findings, and desk findings onto an analysis matrix. An example

of the characteristics and how they were assessed is included at illustration 8 which is an example of the analysis matrix showing the way in which the landscape sensitivity across each of the 34 areas considered was analysed and recorded. Appendix 3 describes the protocol for the analysis.

7. Green infrastructure value

7.1. Green-space and recreational values

The third set of parameters which have been considered during the study are the value of other community functions which the gap areas provide which might be lost if development were to occur within the gap. Similar to green belt land, the land designated as gap performs an important function as recreational land immediately adjoining urban areas. Consequently the analysis of each individual subdivision of gap areas has included an assessment of the amount of public access and or recreational facilities which the area concerned can offer. Hence highly accessible areas with footpaths and park or common land were rated more highly than areas which were totally private.

7.2. Ecological values

Areas which contained land which had received some nature conservation recognition such as Site of Nature Conservation Value, Site of Nature conservation Importance or Site of Special Scientific Interest were rated more highly in the analysis than those which contained no worthwhile habitat areas.

7.3. Other ecosystem services

Account was taken of other ecosystem services such as agricultural productivity, flood attenuation value (i.e. whether the area was hard surfaced or able to allow rainfall to soak into the soil). These parameters were also included within the assessment matrix.

7.4. Analysis

The analysis of the green infrastructure value of the gap areas has been undertaken on the area basis as described earlier. This was undertaken by combining the survey findings, and desk findings onto an analysis matrix. An example of the characteristics and how they were assessed is included at illustration 9 which shows how the green infrastructure value across each of the 34 areas considered was analysed and recorded. Appendix 3 describes the protocol for the analysis.

8. RESULTS OF ANALYSIS

8.1. *Inclusion of land within the Gap designation area*

After the completion of the process of analysis, it became possible to confirm whether each of the individual areas had met the criteria for inclusion within the gap. This was based primarily on the criteria within the approved core strategy policy CS22 which were that:

- 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.

These were the primary factors which were taken into consideration in chapter 5 covering the visual and physical separation of settlements, although landscape sensitivity and green infrastructure value were a secondary consideration.

The mapping at Illustration 10 shows the areas which meet the criteria for inclusion within the gap designation area. The proposed gap designation area includes the majority of land previously described as strategic gap (within the 2000 Local Plan) with the exception of land to the south west of Titchfield around Brownwich and Hook. Local gap areas are not included with the exception of Lower Swanwick/Sarisbury. Explanation and further discussion of the proposed boundary and the omission of this area from the gap follows in the next section of the report .

9. DISCUSSION

9.1. *Policy protection.*

In the past there has been an assumption that the addition of different layers of policy designation has increased the level of protection afforded to land from development. Consequently areas which have been most valued have been the subject of multiple layers of policy. Recent appeal decisions, have not tended to support this view however, and local designations such as 'area of special landscape quality' or 'local gap policy' have tended to be ignored by inspectors. There is clearly therefore a need to be parsimonious with the designation of additional layers of policy protection over and above the level of protection provided by normal countryside policy.

9.2. *Omission of the coast/ western wards area in the strategic gap.*

As a spatial planning tool the strategic gap policy prevents the coalescence of settlements. If one of the settlements concerned extends some distance away from the other there can be a difficulty determining a logical location for the gap boundary. Land to the west of Stubbington, and south of the western wards has been included within the strategic gap policy area in the past, although there is undeveloped coast rather than settlement in this area. The coast has been a convenient and robust natural boundary to the gap; however the inclusion of this land is anomalous to the purpose of gap designation. It is therefore logical to reposition the boundary of the gap to exclude this land in accordance with the PUSH criteria.

The revised gap boundary to the west of the Meon follows either roads or public rights of way, and includes land which is considered to be most vulnerable to development to the south of Titchfield, but excludes the open countryside between the western wards and the coast. This area will not become more vulnerable as it is mostly owned by the county council and already safeguarded for its minerals and agricultural land and is in part managed as a nature reserve.

9.3. *The need for Local gap designation*

If we consider each of the Fareham Local Plan Review (2000) local gap areas individually we find that a number no longer meet the criteria for gap designation. Considering each area individually:

Locks Heath / Segensworth local gap

In spatial terms this area of local gap does not fully separate settlements, which merge together to the north of the gap. The major part of the area is protected by nature conservation designations and associated policy constraints, consequently we are of the opinion that this area does not meet the criteria for inclusion in the gap.

Warsash/Locks Heath and Sarisbury / Locks Heath local gap.

These have suffered from incremental development and are no longer valuable gap areas. Derelict nurseries are unsightly and land is unmanaged. Although removal of gap status may make them vulnerable to development pressure, it is not accepted that they are continuing to maintain the separate identity and character of the two settlements.

Fareham/ Portchester and Wallington / Portchester local gap.

The two Portchester local gaps which are intended to separate Fareham from Portchester, are slightly anomalous. Ribbon development along the Portsmouth to Fareham road dating back to the 30's or earlier, has already linked the two settlements, and whilst the aim of maintaining open space to the north of the old Portsmouth road is desirable, this can be achieved by the existing Core Strategy policies for countryside and the location of development, policies CS14 and CS6. In addition, land to the south of the old Portsmouth road at Cams Hall is also protected by the conservation area designation.

Lower Swanwick and Sarisbury local gap.

The Swanwick/Sarisbury local gap has kept its identity well with most land remaining farmland or parkland. This gap area is contiguous with open countryside and is protected by Policy CS14. We believe that this area meets the criteria for inclusion within a gap designation, as it is preventing the coalescence of Sarisbury and Lower Swanwick, maintaining their distinctive settlement character. This area forms an important part of the wider green infrastructure network associated with the Hamble valley.

In our opinion there are sufficient policies within the Core Strategy to ensure that the areas previously identified as local gaps would receive an appropriate level of policy protection to be able to retain their open and undeveloped nature. In addition the National Planning Policy Framework sections 76-78 offer local people the option of promoting areas as Local Green Space through local and neighbourhood plans. Retention of the separate local gap policy designation is therefore not needed. However merging some previous local gap areas into a single gap criteria could be considered. Both Gosport and Winchester local authorities are considering this option and may be putting it forward in their draft local plans.

9.4. Relationship with Neighbouring Authorities: Gosport

Gosport are fully supportive of strategic gap policy and have tried to include as much open land as possible in the gap within Gosport Borough. The Alver valley is vitally important to the gap especially the large open space area to the south and east of the Cherque Farm estate which is proposed as country park. The area of recreation ground projecting into Fareham Borough on its eastern boundary is also classified as strategic gap, as well as the marginal green areas along the boundary with Fareham. The strategic gap boundary on the eastern side is therefore contiguous and logical across the local authority boundaries.

The south western boundary of the gap currently running along the southern border of HMS Daedalus, parallel to the East-West runway of the active airfield will be reassessed, in the light of the proposed enterprise zone. The Government designated the development areas within the airfield as an enterprise zone in August 2011. Gosport have identified the area within its Daedalus SPD as suitable for economic development and Fareham has identified the areas known as Hangars East and Hangars West as suitable for employment development in its adopted Core Strategy (2011). In March 2012 the councils resolved to grant outline planning permission for development within the enterprise zone areas.

The illustrative master-plan for HMS Daedalus outlines the potential redevelopment of the site, (see illustration 11) and retains open space associated with the runways

and to the north and east of the site. The proposed development around the site may weaken the effectiveness of the gap in the longer term unless the identified open space and open vistas are retained across the site. Sensitive redevelopment of hangars east and west and the area within Gosport will be needed to prevent further coalescence across the gap.

Gosport will be considering the issue of the need for local gaps during preparation of their new local plan. Currently all of Gosport's local gaps are in existing urban areas, Local gap policy areas are 'saved' in the existing local plan but they are covered by other policies that offer protection. It is likely that the local gap designation will not be retained but the strategic gap policy will remain in the new local plan.

9.5. Relationship with Neighbouring Authorities: Winchester

The Meon Valley Strategic Gap stretches north-westwards from the Fareham Borough boundary into Winchester District. The current boundary of the Meon strategic gap in the Winchester development plan is based on the old Structure Plan boundary. It roughly follows the line of development but the gap is more rural in nature. The top end of the gap is the most difficult to discern as there is no distinct boundary and a rough line from the top of the urban boundaries was drawn from Whiteley to Funtley. The existing boundary around Knowle will need to be reviewed in the light of the New Community North of Fareham (NCNF). There is an issue of whether the buffer areas between the NCNF and the Fareham urban edge and also the Winchester boundary should be included in the strategic gap. It is understood that other consultants working on the detailed planning of the NCNF will be addressing this as part of their work on buffer areas. Unfortunately their work was not yet advanced enough to assist us with any specific boundary delineation.

9.6. Targeting of enhancements

In addition to the assessment of whether land met the criteria for inclusion within the gap, we were also able to allocate a broad rating of the quality of the gap area/function at the current time. This was done by assessing the average overall contribution that each of the individual sub areas of the gap made to each of the individual criteria assessed. A simple high, medium or low system was used for the identification of priority areas which was used to tone the mapping at Illustration 12. This uses a traffic light colour system of green for high, orange for medium and red for low value scores. This process was undertaken in a manner which gave priority to the primary parameters for which the gap is designated, physical and visual separation of settlements, whilst also taking account of landscape sensitivity and green infrastructure functions, as secondary factors. This analysis of functionality helped us to identify potential future target areas for enhancement projects. Key areas of gap land which were found to be of lower quality were located, at Solent Breezes, and at Peel Common.

The Solent Breezes site although developed is relatively self-contained and remote, and does not appear to threaten the integrity of the gap. It is understood that the Council maintains a consistent policy of preventing the holiday homes being occupied permanently.

The Peel Common area is one of the more strategically important areas of gap. It consists of an area of ribbon development which has become degraded through the conversion of adjoining agricultural land to paddocks for horses. The location of this

land in a narrow gap between Stubbington and Gosport means it is critical to the functioning of the gap. Targeted enhancements are necessary in this area to improve its gap quality. This narrow gap will also be under pressure from new development on the Daedalus Airfield which will need to be carefully designed to reduce its impact.

Action to improve the quality of the gap in this area could include efforts to help maintain, restore and reinforce the landscape structure. Targeted planting, possibly on the highway verge, promotion of better equestrian management, and aggressive enforcement in relation to stables and equine use, and other forms of development should be considered. In addition, the targeted use of tree preservation orders could help to ensure the retention of tree belts which help to provide some screening of buildings within the gap. We believe that this and certain other areas should be targeted for enhancements, and these are described in our recommendations.

9.7. Potential mechanisms for enhancement of the quality of gaps

Certain areas of the gaps, should be targeted for enhancement through the planning process. In general these areas contain a higher density of existing landowners and buildings, and or grazing land which has been subdivided for equestrian purposes. Our recommendation is that there should be a particularly robust enforcement of the gap policy in these areas, and that green infrastructure enhancements also be targeted at these areas. These might include: the use of tree preservation orders to protect visually significant tree belts or individual trees, the use of article 4 direction orders (which can be used to prevent temporary uses such as car boot sales, caravan sites, and or the installation of stables or fences) and the planting of new tree belts on public land. The encouragement of better equestrian management should also form part of the package of enhancements.

9.8. Green Infrastructure

Protection of the natural environment in the Borough is covered in Policy CS4 Green Infrastructure, Biodiversity and Geological Conservation. This is an all encompassing policy which includes relevant statements on the planning and protection of green infrastructure and the protection and enhancement of nature conservation areas of international importance to national and local nature reserves and local sites of nature conservation value. Specifically in regard to green infrastructure it states:-

'...Green Infrastructure will be created and safeguarded through:

Investing in appropriate management, enhancement and restoration, and the creation of new resources including parks, woodland and trees, and wildlife habitats; Not permitting development that compromises its integrity and therefore that of the overall green infrastructure framework.'

A substantial part of the areas currently covered by strategic and local gap designations can be considered as essential to the green infrastructure network of the Borough. The Fareham Green Infrastructure Strategy will identify the details of the network following on from the PUSH Green Infrastructure Strategy which sets out the sub-regional spatial framework for green infrastructure and guidance from the South East Green Infrastructure Partnership.

9.9. *Local green space*

The NPPF reflects the localism agenda by promoting the creation of local green spaces. These locally valued landscapes must be promoted by the local community. Consideration of designating some existing local gap areas as local green space in Fareham Borough could be explored if there is a strong public lobby and commitment from the local community to designate them.

10. RECOMMENDATIONS

10.1. Overall policy

The Core Strategy contains the PUSH criteria policy to protect strategic gaps. There is no specific mention of local gaps in the Core Strategy but existing local gap policies from the Local Plan Review are currently saved. The preparation of the SADMDPD, as well as the introduction of the NPPF has opened up the opportunity to review both these designations.

The review has studied both strategic gap and local gap designations, surveyed them on site and analysed their functionality. The review has shown that there is a clear need for a gap policy to be retained in the Fareham Borough SADMDPD in order to retain the character of, and prevent coalescence of settlements.

In our opinion there are sufficient policies within the Core Strategy to ensure that most of the areas previously identified as local gaps would be subject to an appropriate level of policy protection to be able to retain their open and undeveloped nature. Retention of a separate local gap policy designation would only be needed to protect the one area which we believe requires this (the Sarisbury - Lower Swanwick local gap area). Consideration was given to merging some previous local gap areas with the established strategic gaps into one single gap criteria, to protect the most valuable area of local gap. However this is not possible as we understand that the council are at this stage unable to change the terminology given that the Core Strategy is adopted. Both Gosport and Winchester local authorities are considering this option and are likely to put forward single gap policies in their draft local plans.

Recommendations:

Local gaps are subject to an appropriate level of protection by other core strategy policies and do not require a specific designation.

The Lower Swanwick/ Sarisbury gap was not included within the original sub regional PUSH strategic gap, but does meet the criteria for inclusion as gap, and should retain a gap designation.

10.2. Definition of the Gap Boundaries

The gap boundaries will continue to follow the edge of existing settlements with the exception of the area to the west of Hillhead and Stubbington. The width of the undeveloped area between Warsash and Stubbington is 5 kilometres and is too great to be considered a gap area preventing the coalescence of the two settlements. This area of nature reserves and agricultural land is adequately protected by nature conservation, mineral protection and countryside policies. A new boundary of the western edge of the gap is shown on Illustration 10.

Recommendations:

The gap policy is retained and the boundaries are adjusted in line with the proposal at illustration 10

Local gap policy areas are removed, except for the inclusion of the former Sarisbury / Swanwick local gap within the strategic gap category as shown on Illustration 10.

10.3. Targeting of enhancement:

In order to maintain the effectiveness of the gap in the longer term, targeted enhancement works are required for the areas which were found to be less effective. We would therefore recommend the addition of clauses to the gap policy to encourage the implementation of enhancement measures such as those described earlier, which could be implemented through a joint development management/ green infrastructure initiative.

Recommendations:

A programme of targeted enhancements be implemented which focuses on the following areas :

Titchfield-Western wards

Solent Breezes.

Peel Common.

10.4. Gaps and Green Infrastructure

All gap areas are vital to the green infrastructure of the Borough. Any new development in these areas would be required to fulfil the conditions of Core Strategy Policy CS4 and CS14 being small in scale and unobtrusive.

Consideration of designating some of the areas within the current local gaps (which will no longer be classified as gaps) as local green-space should be explored if there is a strong public lobby and commitment from the local community to designate them. Although the criteria for defining local green-space set out in the NPPF would need to be met. The criteria are:

where the green space is in reasonably close proximity to the community it serves;

where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

where the green area concerned is local in character and is not an extensive tract of land.

Recommendations:

Current local gap areas which fall out of the settlement gap policy area could be considered as local green-space if there is local support.

Gaps should be regarded as vital for providing green infrastructure

11. References

- 1 **Fareham Core strategy**
<https://www.fareham.gov.uk/pdf/planning/corestrategy/CoreStrategyAdopted.pdf>
- 2 **Framework for Gaps December 2008**
http://www.push.gov.uk/push_policy_framework_for_gaps.pdf
- 3 **Strategic gap and green wedge policies in structure plans: main report for ODPM 2001**
<http://www3.hants.gov.uk/landscape-and-heritage/planning-the-landscape/landscape-character/hampshire-integrated-character-assessment.htm>
- 5 **<https://www.fareham.gov.uk/council/departments/planning/landscape/character/>**
- 6 **<https://www.fareham.gov.uk/council/departments/planning/ldf/gsstudy.aspx>**
- 7 **<https://www.fareham.gov.uk/council/departments/planning/naturec/-draftbioactionplan.aspx>**
- 8 **<http://www.push.gov.uk/work/sustainability-and-social-infrastructure/green-infrastructure.htm>**

1 Fareham Core strategy

<https://www.fareham.gov.uk/pdf/planning/corestrategy/CoreStrategyAdopted.pdf>

2 Framework for Gaps December 2008

http://www.push.gov.uk/push_policy_framework_for_gaps.pdf

**3 Strategic gap and green wedge policies in
structure plans: main report for ODPM 2001**

4 <http://www3.hants.gov.uk/landscape-and-heritage/planning-the-landscape/landscape-character/hampshire-integrated-character-assessment.htm>

5 <https://www.fareham.gov.uk/council/departments/planning/landscape/character/>

6 <https://www.fareham.gov.uk/council/departments/planning/ldf/gsstudy.aspx>

**7 <https://www.fareham.gov.uk/council/departments/planning/naturec/draftbioactionplan.a>
spx**

8 <http://www.push.gov.uk/work/sustainability-and-social-infrastructure/green-infrastructure.htm>



Fareham Borough strategic gap review.

A review of the strategic gap policy designation: Illustrations and Appendices Part 1

Prepared for Fareham Borough Council October 2012

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ILLUSTRATIONS AND APPENDICES:

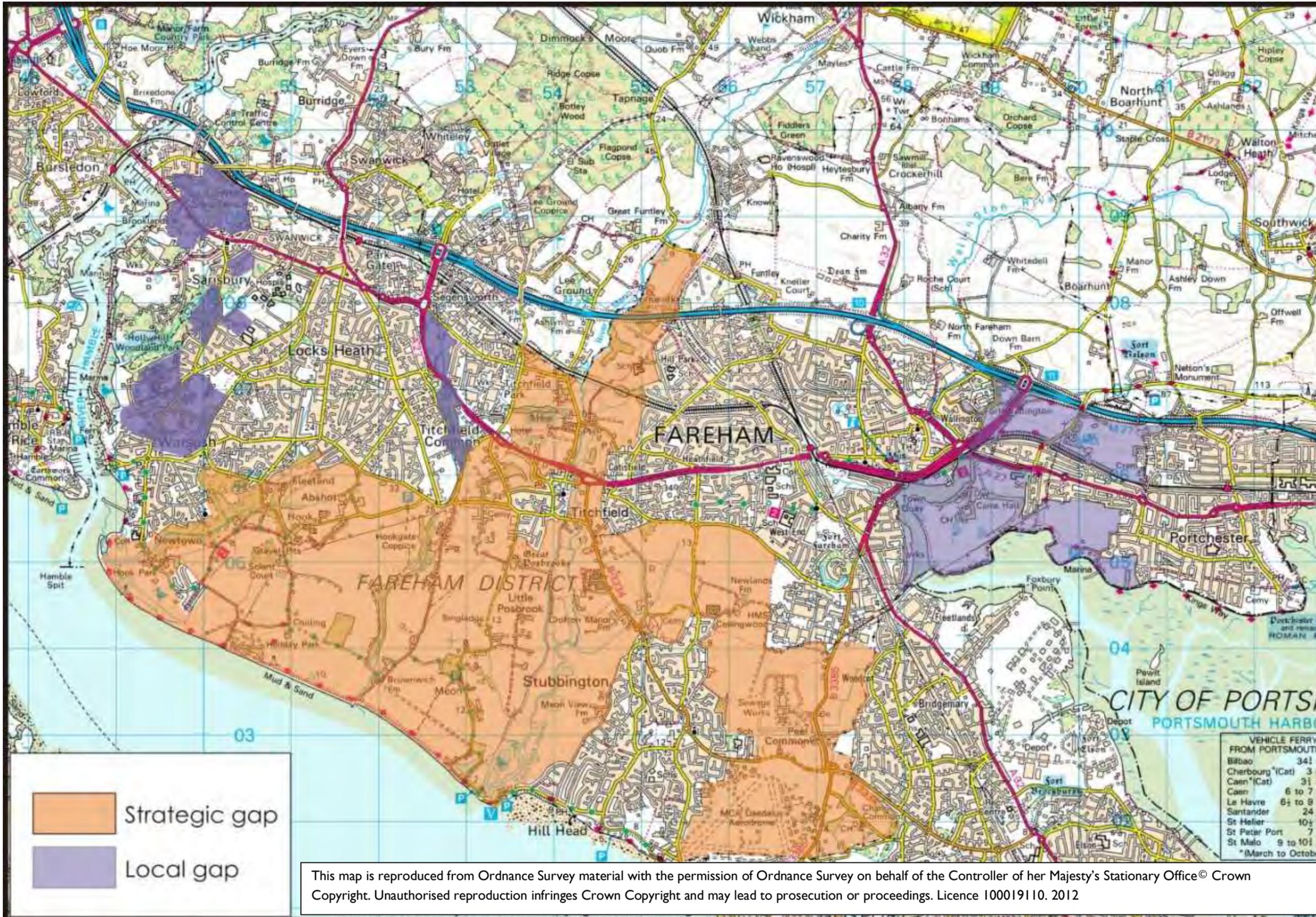
Illustrations

1. Areas designated as strategic and local gaps in the 2000 Local Plan Review.
2. Subdivisions of the study area based on 1996 landscape character assessment.
3. Urban edge character types.
4. Locations of different urban edge types.
5. Analysis matrix: physical and visual separation.
6. Spatial arrangements of gaps and settlements.
7. Conservation areas and gap designation.
8. Analysis matrix: settlement character and landscape sensitivity.
9. Analysis matrix: green infrastructure value.
10. Proposed gap areas.
11. HMS Daedalus master plan.
12. Priority gap enhancement areas.

Appendices

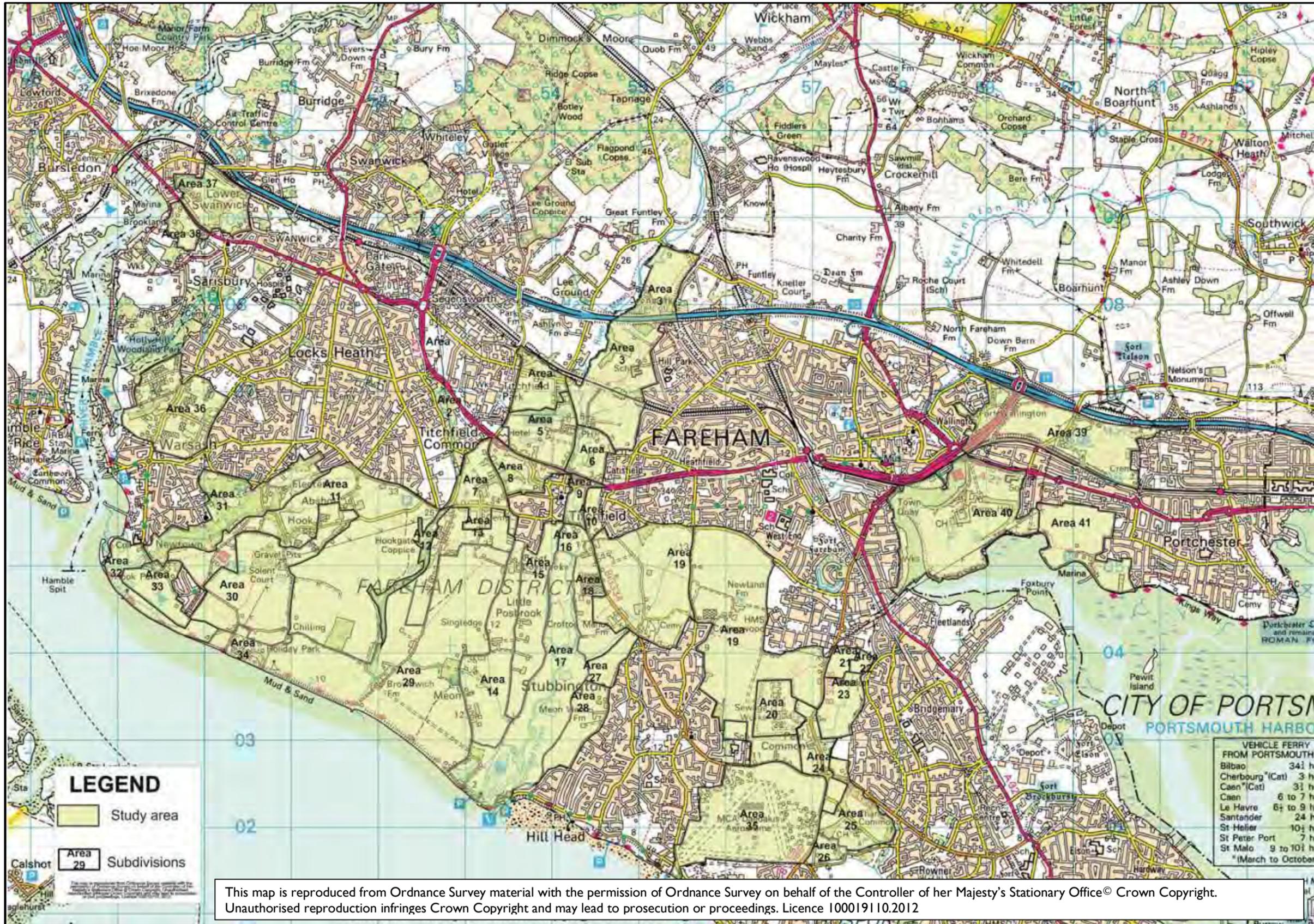
1. Study brief.
2. Site survey pro-forma
3. Matrix analysis protocol.
4. Gap assessment analysis matrices (refer to Part 2)

ILLUSTRATION 1: AREAS DESIGNATED AS STRATEGIC AND LOCAL GAPS IN THE 2000 LOCAL PLAN REVIEW.



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ILLUSTRATION 2: SUBDIVISIONS OF THE STUDY AREA BASED ON 1996 LANDSCAPE CHARACTER ASSESSMENT.



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ILLUSTRATION 3: Urban edge character types.

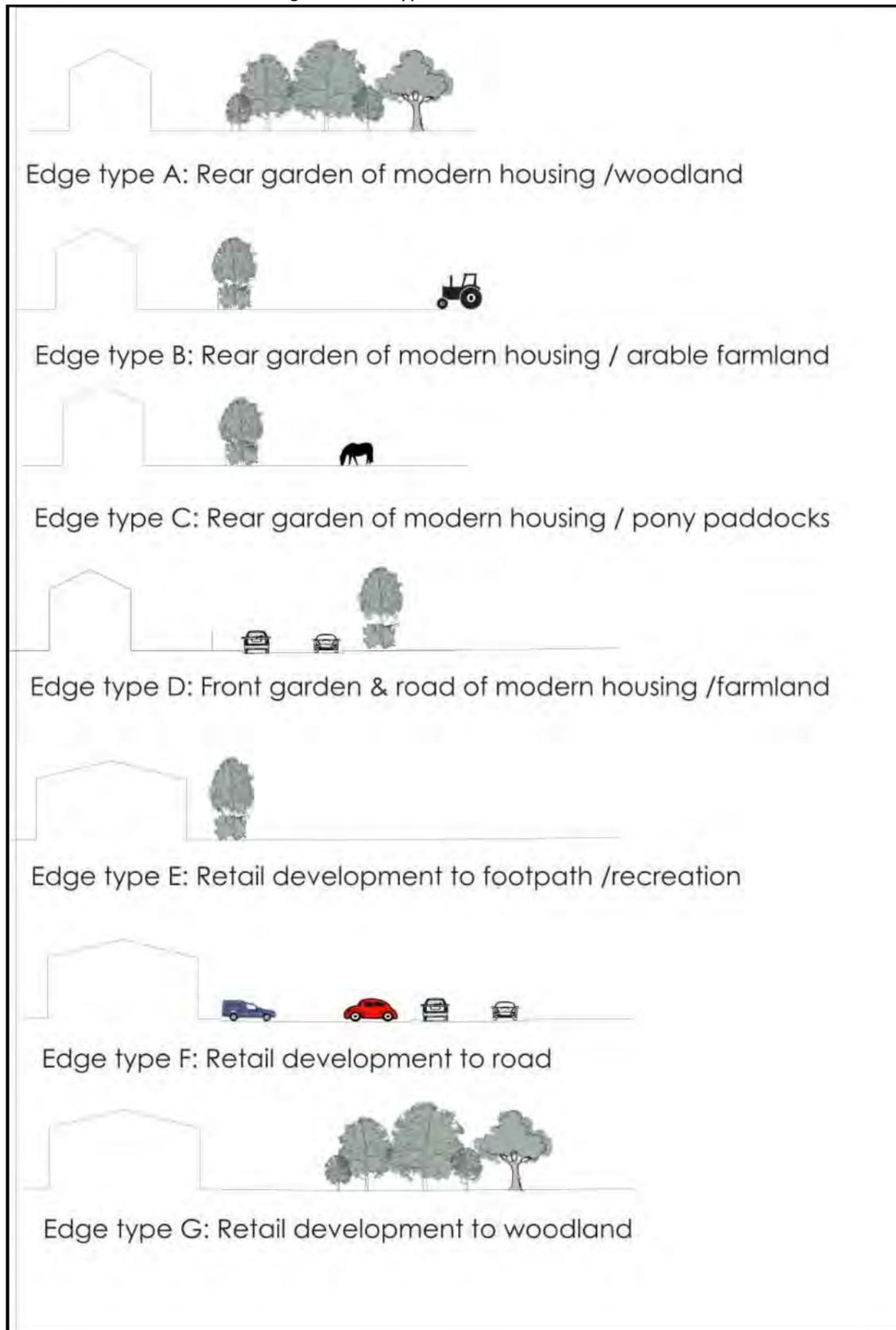


ILLUSTRATION 4: LOCATION OF DIFFERENT URBAN EDGE TYPES.

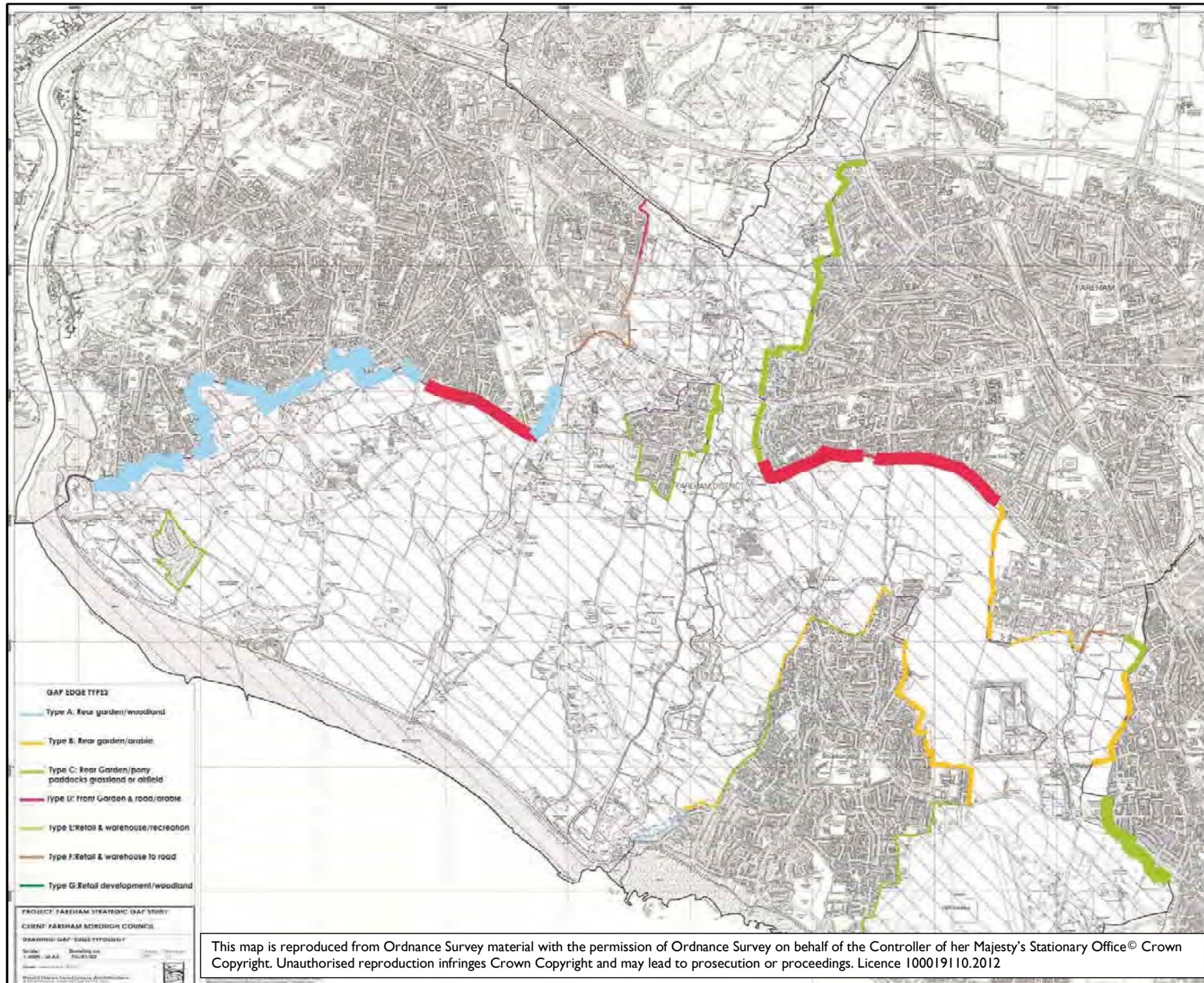


ILLUSTRATION 5: ANALYSIS MATRIX: PHYSICAL AND VISUAL SEPARATION.

GAP FUNCTIONALITY ASSESSMENT MATRIX

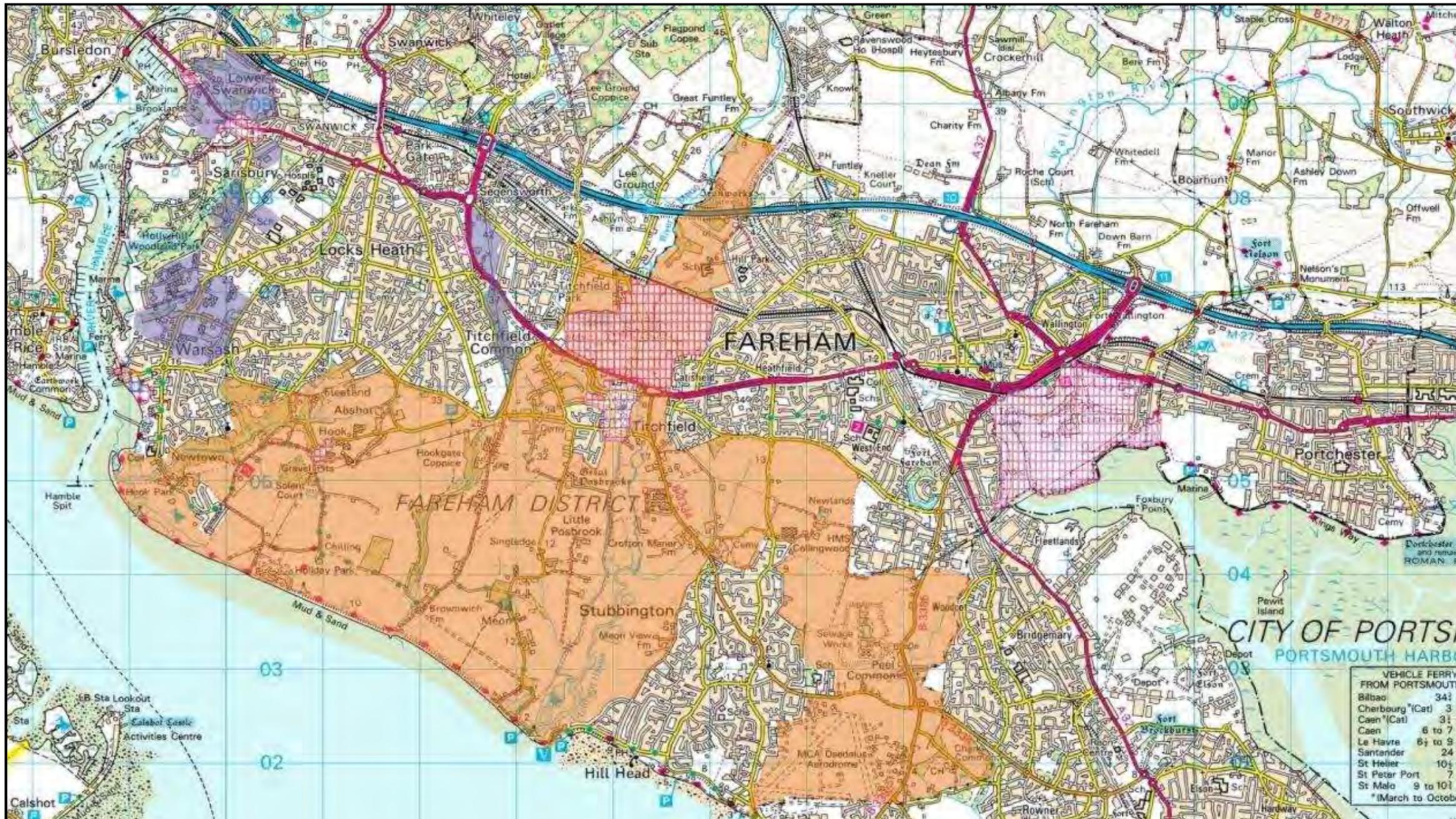
Area :	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Physical and visual separation						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						

ILLUSTRATION 6 : SPATIAL ARRANGEMENT OF GAPS AND SETTLEMENTS.



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ILLUSTRATION 7: CONSERVATION AREA AND GAP DESIGNATION.



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ILLUSTRATION 8: ANALYSIS MATRIX: SETTLEMENT CHARACTER AND LANDSCAPE SENSITIVITY.

GAP FUNCTIONALITY ASSESSMENT MATRIX

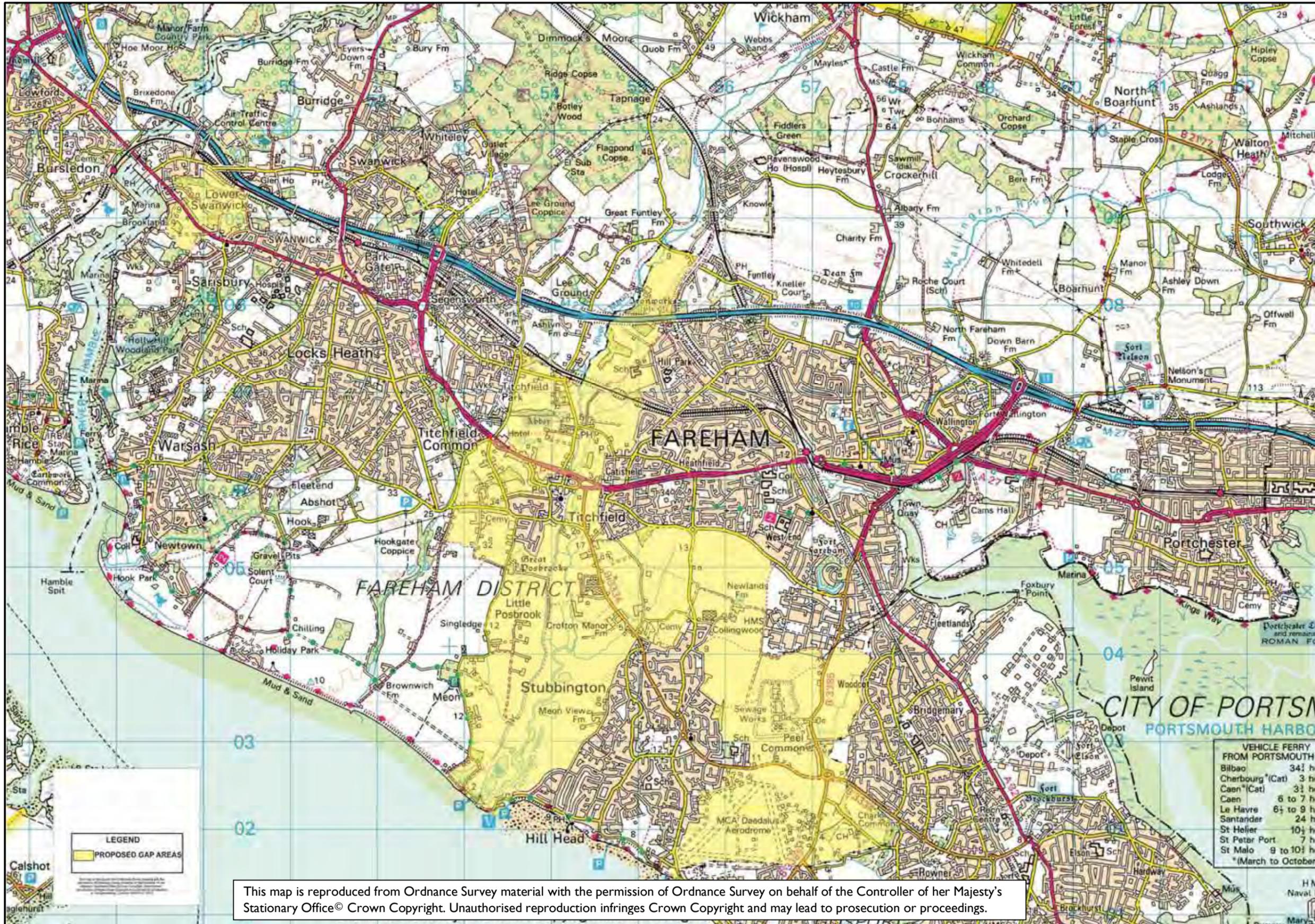
Area :	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Settlement character and landscape sensitivity						
Separation of areas of distinctive settlement character						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						

ILLUSTRATION 9: ANALYSIS MATRIX GREEN INFRASTRUCTURE VALUE.

GAP FUNCTIONALITY ASSESSMENT MATRIX

Area :	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Green infrastructure value						
Levels of permitted public access						
Amount of recreational facilities						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						

ILLUSTRATION 10: PROPOSED GAP AREAS.

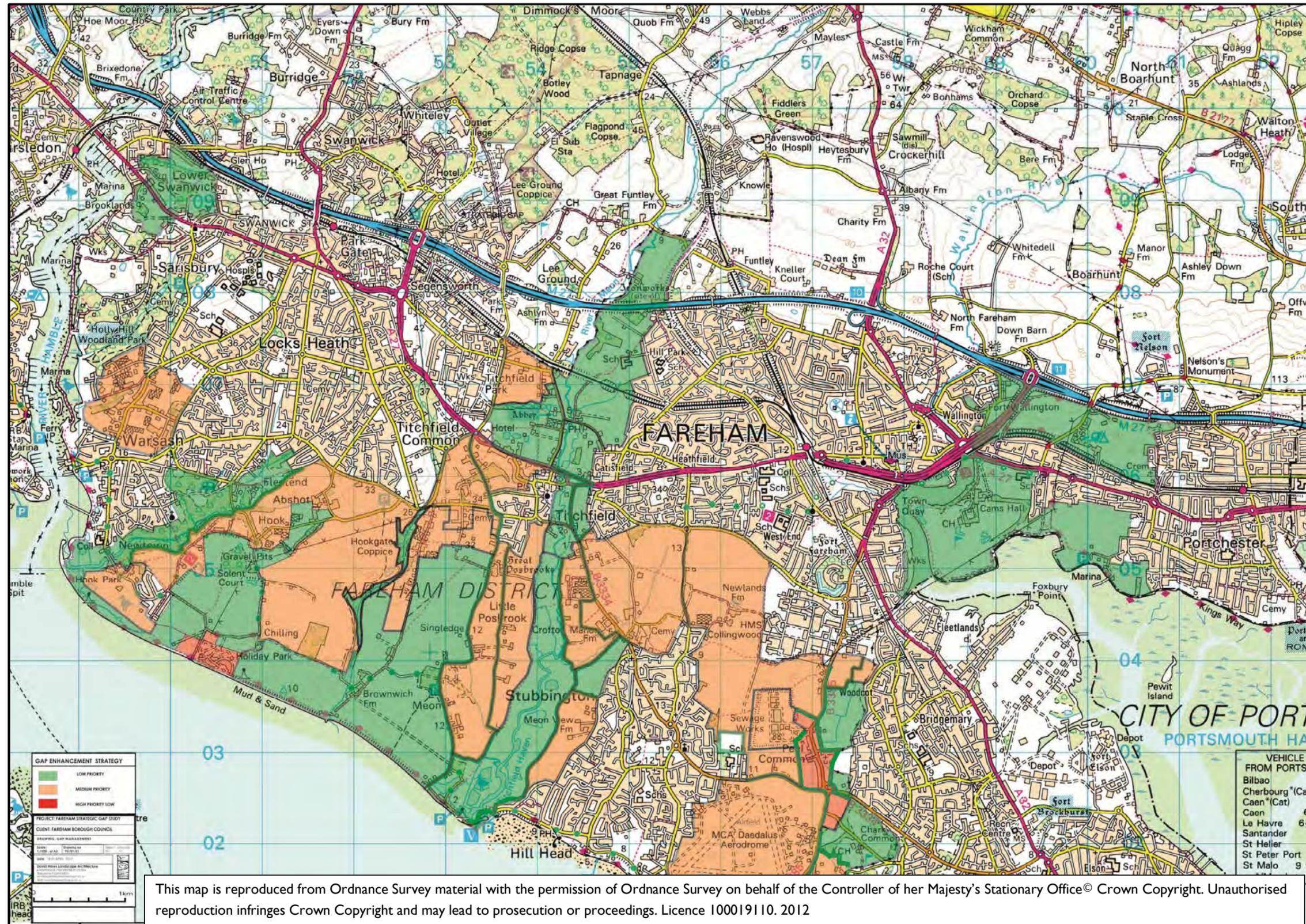


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ILLUSTRATION 11: HMS DAEDALUS ILLUSTRATIVE MASTER PLAN (COPYRIGHT SEEDA/LDA)



ILLUSTRATION 12: PRIORITY GAP ENHANCEMENT AREAS.



APPENDIX 1 STUDY BRIEF

Policy Context

Strategic Gaps

Fareham's Core Strategy (adopted 4 August 2011) sets out the planning framework for the Borough up to 2026. The Core Strategy sets out the policy for Strategic Gaps (CS22), which supersedes the previous Strategic Gap policy contained within the Local Plan Review (2000) (Policy C11). Existing Strategic Gap boundaries as delineated by the Proposals Map (June 2000) remain in effect until they are replaced through the Site Allocations and Development Management (SADM) DPD. Core Strategy Policy CS22 commits the Council to a review of the boundaries of the Strategic Gaps through preparation of the SADM DPD.

Gaps between settlements, particularly between Fareham and the Western Wards and Fareham and Stubbington, help define and maintain the separate identity of individual settlements and have strong local support. Strategic gaps do not have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. Continuing pressure for high levels of development mean that maintaining gaps continues to be justified.

Core Strategy policy CS22 states that, "Strategic Gaps have been identified between Fareham/Stubbington and Western Wards/Whiteley (the Meon gap); and Stubbington/Lee on the Solent and Fareham/Gosport." The supporting text explains that, "Maintaining separation between Fareham and Titchfield Common/Segensworth and Fareham and Stubbington will prevent coalescence of the settlements in this densely settled part of South Hampshire. The countryside separating the settlements is narrow in places and under pressure for development, but it provides opportunities for additional public access."

Local Gaps

The Local Gap Policy (C12) and Proposals Map designation continues to be saved under Government Direction (September 2007) and remains part of the development plan for Fareham Borough.

While the Strategic Gaps were originally identified in the Hampshire Structure Plan, the Local Gaps were defined by the Fareham Borough Local Plan Review (2000) as being other gaps of more local importance. The supporting text to Policy C12 indicates that there has already been partial or total coalescence of some settlements and the local gaps provide protection from inappropriate development in order to maintain the separate identity of smaller settlements.

Local Gaps are identified in the Borough between Lower Swanwick and Sarisbury in the west; separating Sarisbury, Warsash and Segensworth from the main residential area of Locks Heath; and separating Fareham and Portchester.

Key Requirements for the Gap Review Study

A review of the detailed boundaries of Strategic Gaps will be undertaken in line with the criteria as set out in Core Strategy Policy CS22 as follows:

- 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.

Further guidance may be found in the Partnership for Urban South Hampshire's "Policy Framework for Gaps" (December 2008) which provided the basis and justification for the Core Strategy policy. The review should analyse the functionality of Strategic Gaps in providing physical and visual separation between settlements with a view to preventing coalescence.

The review should have regard to the need for the SADM DPD to meet the development requirements of the Core Strategy, most but not all of which may be accommodated within existing urban area boundaries; and the potential for further development requirements arising from the review of the South Hampshire Strategy.

The review should consider the potential of coalescence between settlements/urban areas within Fareham Borough and settlements/urban areas in neighbouring authorities. Where necessary, this should be carried out through consultation with relevant authorities.

Any consultant proposal must include provisions for data to be made available to the Council for the editing and updating of the Proposals Map, including GIS data provided in an appropriate format compatible with the Council GIS system. Ownership of data used and produced during the study will be retained by the Council.

The Core Strategy does not identify the Local Gaps as a strategic requirement or provide a context for them. However, the evaluation of the Local Gap policy is required to establish whether the continuation of this designation is required and justified or whether other designations are sufficient to fulfil the role of this policy.

APPENDIX 2 EXAMPLE SURVEY PRO FORMA

Fareham Gap study	Location No	Surveyor	Date	Land unit ref	Photos	Notes
Survey details		LL DH				
Gap Value parameters						
Green space value	Use levels					
Public access	High	Medium	Low	Nil		
Recreational facilities	High	Medium	Low	Nil		
Prevention of coalescence						
Existing buildings within gap?	High density	Med Density	Low density	None		
Adding to coherence of gap	High	Medium	Low			
Perception of being gap	High	Medium	Low			
Fringe issues	Abandoned	Pony paddocks	Tipping	Caravans		
Identity /perception	Village Green	Nursery	Woodland	Derelict land	Pylon line	Common Farmland Nature reserve
Intervisibility						
Urban edge type	A	B	C	D	E	
Distance across gap at narrowest point	0-100M	101-500M	500-1000	1000+		
Infrastructure features	Pylons	Sewage works	Hangers	Transformers	Masts	
Topography	Flat	sloping	undulating	other		
Density of field boundary trees	Dense	Intermediate	Open	Nil		
Density of field boundaries	Dense	Intermediate	Open	Mature trees	Hedgerows	
Predominant land use	Arable cropping	Horticultural	Grassland	Woodland	Other	
Other green infrastructure value						
Ecological/ habitat	High/ designated	Med /local designation	Low	Nil		
Flood storage /protection / relief	High	Medium	Low	Nil		
Agricultural productivity	High	medium	low	Nil		
Cultural heritage	High	medium	low	Nil		
Sense of place	High	medium	low	Nil		
Tranquillity	High	medium	low	Nil		

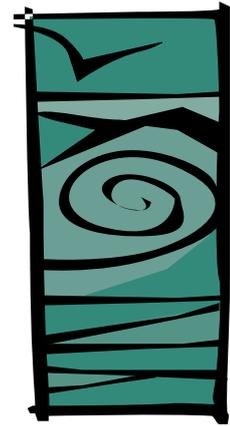
APPENDIX 3 ANALYSIS PROTOCOL

Our analysis of whether land meets the criteria to be included within the Gap designation area must focus on the primary purposes of designation which is the prevention of coalescence of settlements. This is described more fully in the core strategy policy CS 22 : which gives the following criteria :

- 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.
- The purpose of the study is consequently to identify whether land performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence. The land is assumed to have an open nature or sense of separation, both physical and visual.

Our method for assessing the suitability of the land for inclusion is therefore to assess a range of factors which contribute to each of these criteria based on each of the sub areas identified using the 1996 landscape character areas which form the basis of each of the sub areas being considered. This is recorded on the summary assessment matrix which must be completed in a consistent way for each sub area. In each case through a combination of the data recorded on the site visit, (pro forma and photography) and desk study using mapping, GIS data supplied by Fareham Borough Council, aerial photography and a range of web sources a rating of each criteria is made on a value scale of five from very high to very low. This valuation is by necessity an average based on the whole of the sub area being considered for each criteria. Guidance on the completion of the assessment matrix criteria are as follows:

Prevention of coalescence	All judgements are relative rather than empirical
Low density of existing buildings	Density: poor = many buildings; very high = no buildings
Significance of distance across gap at narrowest point	Distance: short distance = high significance large distance low significance
Few past planning applications	Based on GIS data from Fareham DC; many = poor
Coherent apparent ownership pattern	Large number of owners = poor.
Clearly defined coherent boundary	Distinctive boundary feature such as road = high
Visual separation	
Separation of areas of distinctive settlement character	More distinctive settlement character = high
Density of vegetation screening urban edge	Refer to edge study
Sense of separation due to topography and density of vegetation across gap	From field survey based on perception in the field
Green space value	
Levels of permitted public access	High number of footpaths or common land = high
Amount of recreational facilities	High number of recreational facilities such as playing fields = high
Intactness / integrity of landscape character	Intact field boundary pattern = high. high number of pony paddocks = low
Landscape designation	Subject to local designation = high
Scenic beauty/quality	From field survey based on perception in the field
Tranquillity	From field survey based on perception in the field and presence of roads.
Cultural heritage / Historic association value	Presence of historical or traditional features = high
Nature conservation / Earth science value	Designations e.g. SAC very High SSSI high to low = no designation
Flood attenuation	Open grassland = high hard standings = low
Agricultural productivity	Highly productive = horticultural cropping low = grassland
Prominence of area within wider landscape	Based on perception in field survey and topography etc.
Overall contribution to suitability for inclusion within gap	
Broad Rating *	A broad rating based on assessment of the above criteria.



Fareham Borough strategic gap review.

***A review of the strategic gap policy designation:
Illustrations and Appendices Part 2
Appendix 4 Gap analysis matrices.***

Prepared for Fareham Borough Council October 2012

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GAP ANALYSIS MATRICES

Area : 1 Locks Heath Local gap	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area : 2 Kites Croft Local gap	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area 3 : Upper Meon Valley	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area 4 : Tichfield Park	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES				NO	

Area 5: Tichfield Abbey	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area : 6 Catisfield	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area 7 :Titchfield/ West Hill park	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area :8 Titchfield north west	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area : 9.Titchfield Meon River	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area 10: Titchfield East Meon Valley	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area :11 Abshot	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area :12 Woodland strip Brownwich Valley	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings	■					
Significance of distance across gap at narrowest point			■			
Few past planning applications	■					
Coherent apparent ownership pattern		■				
Clearly defined coherent boundary		■				
Visual separation						
Separation of areas of distinctive settlement character			■			
Density of vegetation screening urban edge	■					
Sense of separation due to topography and density of vegetation across gap	■					
Green space value						
Levels of permitted public access				■		
Amount of recreational facilities			■			
Intactness / integrity of landscape character	■					
Landscape designation						
Scenic beauty/quality	■					
Tranquillity	■					
Cultural heritage / Historic association value			■			
Nature conservation / Earth science value		■				
Flood attenuation	■					
Agricultural productivity				■		
Prominence of area within wider landscape		■				
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area : 13 Titchfield south west	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area : 14 Meon Village	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area :15 Lower Posbrook	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area : 16 Titchfield South east	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area : 17 Meon Valley South	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings	■					
Significance of distance across gap at narrowest point		■				
Few past planning applications	■					
Coherent apparent ownership pattern	■					
Clearly defined coherent boundary		■				
Visual separation						
Separation of areas of distinctive settlement character	■					
Density of vegetation screening urban edge		■				
Sense of separation due to topography and density of vegetation across gap		■				
Green space value						
Levels of permitted public access		■				
Amount of recreational facilities		■				
Intactness / integrity of landscape character		■				
Landscape designation		■				
Scenic beauty/quality	■					
Tranquillity	■					
Cultural heritage / Historic association value	■					Canal etc
Nature conservation / Earth science value	■					
Flood attenuation	■					
Agricultural productivity				■		
Prominence of area within wider landscape		■				
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area : 18 Tichfield road glass houses	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area 19 : Newlands farm	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings	■					
Significance of distance across gap at narrowest point		■				
Few past planning applications			■			
Coherent apparent ownership pattern	■					
Clearly defined coherent boundary	■					
Visual separation						
Separation of areas of distinctive settlement character	■					
Density of vegetation screening urban edge		■				
Sense of separation due to density of vegetation across gap				■		
Green infrastructure value						
Levels of permitted public access	■					
Amount of recreational facilities				■		
Intactness / integrity of landscape character			■			
Landscape designation					■	
Scenic beauty/quality			■			
Tranquillity			■			
Cultural heritage / Historic association value			■			
Nature conservation / Earth science value				■		
Flood attenuation				■		
Agricultural productivity	■					
Prominence of area within wider landscape		■				
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area :20 Sewage works	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area :21 Newgate lane North	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERIA FOR DESIGNATION?	YES	NO
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Area :22 Woodcot North	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area 23 : Peel Farm	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area :24 Peel Common	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective	BECOMES TARGET AREA FOR ENHANCEMENT		

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area : 25 Chark Common	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area : 26 Shoot Farm	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERIA FOR DESIGNATION?	YES	NO
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Area :27 Stubbington North West	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area : 28 Stubbington West Meon View	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area : 29 Brownwich Farms	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area : 30 Hook & Abshot	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area :31 Warsash Common	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area : 32 Hook and Warsash nature reserve	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings	■					
Significance of distance across gap at narrowest point		■				
Few past planning applications	■					
Coherent apparent ownership pattern	■					
Clearly defined coherent boundary			■			
Visual separation						
Separation of areas of distinctive settlement character	■					
Density of vegetation screening urban edge			■			
Sense of separation due to topography and density of vegetation across gap		■				
Green space value						
Levels of permitted public access	■					
Amount of recreational facilities			■			
Intactness / integrity of landscape character	■					
Landscape designation						
Scenic beauty/quality		■				
Tranquillity		■				
Cultural heritage / Historic association value			■			
Nature conservation / Earth science value	■					
Flood attenuation	■					
Agricultural productivity					■	
Prominence of area within wider landscape		■				
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area : 33 Hook Park Estate	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						Sense of being countryside
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERIA FOR DESIGNATION?	YES	NO
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Area : 34 Solent Breezes	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective	BECOMES TARGET AREA FOR ENHANCEMENT		

MEET CRITERIA FOR DESIGNATION?	YES	NO
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Area : 35 HMS Daedalus	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
3Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERA FOR DESIGNATION?	YES	NO
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Area : 36 Warsash Gap	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			

MEET CRITERIA FOR DESIGNATION?	YES	NO
---------------------------------------	------------	-----------

Area : 37 Lower Swanwick/ Sarisbury Gap North	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERA FOR DESIGNATION?	YES			NO		

Area : 38 Lower Swainswick/ Sarisbury Gap South	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area : 39 Portsmouth Hill	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area : 40 Cams Hall West	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						Conservation area
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

Area : 41 Cams Hall East	Major/ Very high	Substantial/ Good High	Moderate/ Medium	Slight/ Low	Negligible/ Poor	Comment
Prevention of coalescence						
Low density of existing buildings						
Significance of distance across gap at narrowest point						
Few past planning applications						
Coherent apparent ownership pattern						
Clearly defined coherent boundary						
Visual separation						
Separation of areas of distinctive settlement character						
Density of vegetation screening urban edge						
Sense of separation due to topography and density of vegetation across gap						
Green space value						
Levels of permitted public access						
Amount of recreational facilities						
Intactness / integrity of landscape character						
Landscape designation						
Scenic beauty/quality						
Tranquillity						
Cultural heritage / Historic association value						
Nature conservation / Earth science value						
Flood attenuation						
Agricultural productivity						
Prominence of area within wider landscape						
Overall contribution to gap effectiveness						
Broad Rating *	Highly effective	Moderately effective	Less effective			
MEET CRITERIA FOR DESIGNATION?	YES			NO		

APPENDIX 4
HOUSING LAND SUPPLY REPORT

LAND AT NEWGATE LANE (NORTH) AND LAND AT NEWGATE LANE (SOUTH), FAREHAM

APPENDIX ON HOUSING NEED AND SUPPLY MATTERS

ON BEHALF OF FAREHAM LAND LP AND BARGATE HOMES LTD

Prepared by: NEIL TILEY ASSOC RTPI

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E. EXECUTIVE SUMMARY

- E.1 The following report considers a number of issues relevant to housing need and supply in Fareham Borough as briefly summarised below.

Affordability of Housing

- E.2 MHCLG publish statistics which indicate that the appropriate measure of the affordability of housing in Fareham Borough is that house prices are currently 9.09 times the income of households. The standard method for assessing the minimum local housing need assumes that where the house price is 4 times the income of households no affordability uplift is required. In Fareham Borough, the ratio is therefore 2.3 times worse than this 'acceptable' level.
- E.3 This indicates a particular need to boost supply, as provided for through the standard method, to address the barriers to accessing the market in Fareham Borough.

Affordable Housing

- E.4 In an unaffordable and inaccessible housing market, many households fall into affordable housing need. The Housing Evidence: Overview Report of the Council identifies a need for 302 affordable homes per annum from 2011 onwards in Fareham Borough.
- E.5 Since 2011, only 610 affordable housing completions have been achieved at an average of 76 per annum which equates to a backlog of 1,806 affordable homes. It is therefore apparent that not only is there a need to boost the supply of market housing to improve affordability in Fareham Borough, there is a very significant need to boost the supply of affordable housing both to address the shortfall which has accrued over the previous 8 years but also to meet newly arising need.

Five-year land supply

- E.6 Fareham Borough Council accepts that it is unable to demonstrate a five-year land supply such that the 'tilted balance' of paragraph 11d of the NPPF is engaged. The extent and period over which a shortfall in the five-year land supply persists may also be material to the weight afforded to policies and to the provision of housing.

- E.7 Fareham Borough Council considered that it was able to demonstrate a 4.66 year land supply based on a requirement for 2,730 homes and a deliverable supply of 2,544 homes. S78 appeal Inspectors that have considered this position and have concluded that the deliverable supply is likely to be significantly less and accordingly the shortfall is likely to be significantly greater. This has been acknowledged by the Council in a recent committee report which appears to indicate that the Council accepts that the land supply position is closer to 2.4 years.
- E.8 The following report considers the five-year land supply position and demonstrates that there is a requirement for 2,743 homes over the following five-year period. It also considers the deliverable supply in accordance with the NPPF, the PPG, and the findings of S78 Inspectors and the Secretary of State across England. The report identifies a deliverable supply of 711 homes as compared to the supply of 2,544 identified by the Council.
- E.9 It is therefore apparent that in accordance with the findings of recent Inspectors, the deliverable supply is significantly lower than identified by the Council. Based on the available evidence, the Council is currently only able to demonstrate a **1.30 year land supply with a shortfall of 2,032 homes.**
- E.10 It should however be acknowledged that the Government has proposed to review the minimum local housing need, against which the five-year land supply is assessed, in the spring of 2020. Within Planning for the Future, the Government has proposed to uplift the local housing need to provide for 300,000 homes per annum nationally, rather than the circa 266,000 homes which the current standard method identifies, and that this will be achieved by encouraging development in or near urban areas. It is therefore considered likely that the minimum local housing need will increase nationally and in urban areas such as Fareham in the spring. It may be that the above and following findings need to be adjusted on this basis.

Future five-year land supply

- E.11 Based on the available evidence, the future five-year land supply position is also calculated to provide an indication of whether the five-year land supply shortfall is likely to persist. This demonstrates that even if the trajectory of the Council comes to fruition, notwithstanding that it provides no evidence let alone clear evidence of deliverability as required by the NPPF and that the trajectories are

unrealistic, the Council will soon have a record of substantial under-delivery such that the 'tilted balance' will be automatically engaged and that furthermore the Council will remain unable to demonstrate a five-year land supply for at least the short-term¹.

¹ It is not currently possible to calculate the position which will arise in the medium or long-term as this will be dependent upon the Government's review of the local housing need, the housing requirement which will be adopted in the Fareham Local Plan Review and the allocations therein, none of which can be pre-empted at the moment.

1. INTRODUCTION

- 1.1 This report addresses the housing land supply position of Fareham Borough Council in accordance with the current NPPF².
- 1.2 Whilst the Council accepts that it is unable to demonstrate a five-year land supply, it has been established in case law that the extent of a shortfall and the period over which this is likely to persist may be material to the weight afforded to policies and to the provision of housing³. I therefore address this in the following report.

² Published on 24th July 2018 and subsequently revised on 19th February 2019

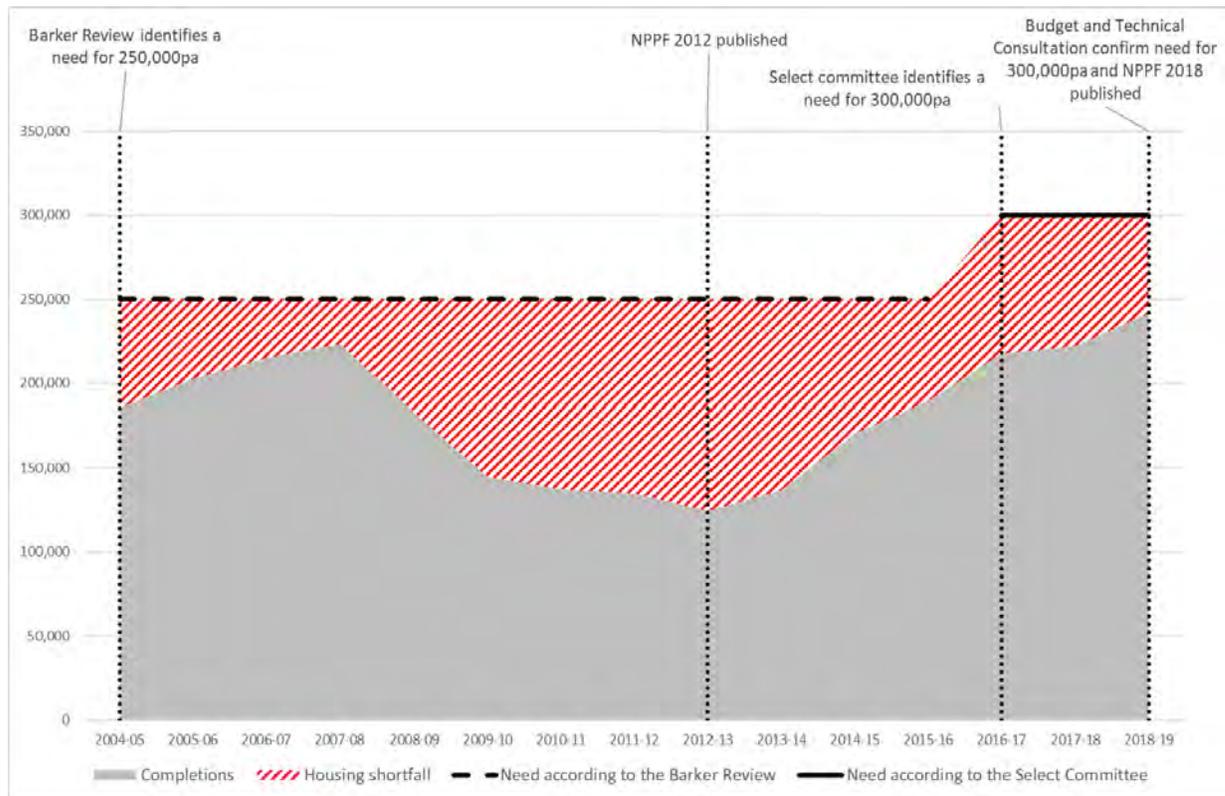
³ See for example, paragraph 60 of the High Court Judgment of *Phides Estates (Overseas) Limited vs the Secretary of State for Communities and Local Government et al* [2015] EWHC 827 (Admin); and paragraph 28 of the High Court Judgment of *Shropshire Council vs the Secretary of State for Communities and Local Government et al* [2016] EWHC 2733 (Admin).

2. THE HOUSING CRISIS

The National Position

- 2.1 The national housing crisis is well documented and evidenced in a vast array of documents, including in relation to its causes, its implications and the necessary response as briefly described below.
- 2.2 The housing crisis has arisen largely as a result of the discrepancy between the number of homes built and the need.
- 2.3 The Barker Review in 2004 identified that there was a need to build circa 250,000 homes per annum to prevent spiralling house prices and a shortage of affordable homes. However, in the period 2004 to 2012, an average of only 178,000 homes per annum were built.
- 2.4 The former NPPF was then introduced in 2012 containing the Government objectives to significantly boost the supply of housing and to meet housing needs. However, in the period from 2012 to 2019, an average of only 187,000 homes per annum were built.
- 2.5 As a result of the continued shortfall against the need identified in the Barker Review, the Select Committee on Economic Affairs to the House of Lords identified a need to deliver 300,000 homes per annum in the Building More Homes report, July 2016. This number has been confirmed as being needed by the Government in the Budget 2018, the Technical Consultation on Updates to National Planning Policy and Guidance, October 2018 and Planning for the Future, March 2020. The balance of need and supply is presented graphically in Figure 2.1 below.

Figure 2.1 – a comparison of need and supply nationally



2.6 This demonstrates that housing supply nationally has not come close to meeting needs over the previous 15 years in any single year and also illustrates the cumulative shortfall in housing supply. Indeed, over the last 15 years there have been a total of 2,729,000 completions as compared to a need for 3,750,000 based on the need for 250,000 identified in the Barker Review. This equates to a shortfall of over a million homes in 15 years.

2.7 As housing need has significantly exceeded the supply, the greater competition for those houses that do exist has had an uplifting effect on the average market value of properties with adverse implications on the accessibility of the housing market to households. There are many statistics which demonstrate the decreasing accessibility of the market including (but not limited to):

- The lower quartile house price to lower quartile earnings ratio increased from 6.27 to 7.29 from 2004 to 2018 in England according to the MHCLG;
- The median house price to median earnings ratio increased from 6.60 to 8.00 from 2004 to 2018 in England according to the MHCLG;

- The average house price across the UK increased from £139,027 in 2004 to £211,792 in 2018 according to Nationwide;
- The percentage of overcrowded households has increased from 2.5% to 3.2% from 2004 to 2008 in England according to the MHCLG;
- The number of concealed families has increased from 161,254 in 2001 to 275,954 in 2011 across England according to the Census; and
- The number of households living in shared dwellings has increased from 65,998 in 2001 to 77,955 in 2011 across England according to the Census.

2.8 It is clear that housing supply was not meeting housing need under the former NPPF with significant adverse effects on accessibility. These effects manifest themselves in real households facing real difficulty and often being unable to access appropriate housing.

2.9 In response, the Government published the current NPPF in 2018⁴. This seeks to significantly boost the supply of housing from that achieved under the former NPPF to address the under-delivery of housing and the existing backlog in housing supply through a number of mechanisms including the use of the standard method for calculating the minimum local housing need and the use of a more realistic and balanced definition of a deliverable site.

The Local Position

2.10 As set out above, there is a national housing crisis, which is causing real harm to real households. However, these issues are more pronounced in some areas than in others.

2.11 In Fareham Borough, a household is currently required on average to spend 9.09 times the annual average income to access housing according to the ONS. The PPG (2a-004) indicates that where a household is required to spend 4 times its income, then no affordability adjustment is required to the projections, which infers that this is the level at which the Government consider that the affordability of housing is acceptable. Housing in Fareham Borough is 2.3 times less affordable than this 'acceptable level', which is likely to compromise the ability of a larger proportion of households to access the market, with consequent social harms

⁴ Which was then amended to provide additional clarity in 2019.

(including overcrowding, shared households, food and fuel poverty, homelessness etc).

- 2.12 The resultant pressures on the accessibility of housing are likely to result in a greater number of households falling into affordable need as they are unable to access suitable market accommodation viably.
- 2.13 The Objectively Assessed Housing Need Update (GL Hearn, April 2016) calculates the affordable housing need in Fareham and across the wider Partnership for Urban South Hampshire area (PUSH). It does so on the basis of different affordability thresholds, namely the proportion of household income which can be spent on housing. The results are summarised in Table 2.1 below.

Table 2.1 – the affordable housing need

Affordability threshold	Annual affordable need
25%	385
30%	302
35%	234
40%	175

- 2.14 The Housing Evidence: Overview Report took account of this and recommended that the emerging Local Plan Review proceeded on the basis of a 30% affordability ratio, identifying an annual affordable housing need for 302 homes per annum in the period 2011 to 2036.
- 2.15 In the period from 2011 to 2019, the MHCLG record that a total of 610 affordable homes have been delivered in Fareham Borough at an average of 76 per annum. This equates to a **backlog of 1,806 affordable homes** as calculated in Table 2.2 below.

Table 2.2 – the affordable housing backlog

	Annual affordable housing need	Affordable housing delivery	Surplus/shortfall
2011/12	302	127	-175
2012/13	302	91	-211
2013/14	302	58	-244
2014/15	302	137	-165
2015/16	302	27	-275
2016/17	302	85	-217
2017/18	302	41	-261
2018/19	302	44	-258
TOTAL	2,416	610	-1,806

2.16 It is therefore apparent that there is a pressing need to increase the supply of housing in Fareham Borough, not only to prevent additional households falling into affordable need through the provision of a sufficient number of market homes but also to address the affordable housing needs which have not been met through the provision of affordable homes.

3. POLICY CONTEXT

New National Planning Policy Framework (NPPF)

- 3.1 The current NPPF was published on 24th July 2018. It was then subject to further minor revisions on 19th February 2019.
- 3.2 The Government's imperative to significantly boost the supply of housing to address the national housing crisis which currently exists, is set out in paragraph 59 of the NPPF, which requires local planning authorities:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."
(my emphasis)

- 3.3 Paragraph 73 of the NPPF maintains the requirement of the former NPPF that a Council maintain an assessment of the deliverable supply with an appropriate buffer. It identifies that the five-year land supply should be assessed by reference to the adopted housing requirement where this is less than five-years old, but in other cases it should be assessed against the local housing need.
- 3.4 Footnote 7 identifies that policies should be considered out-of-date in circumstances including:

"...for applications involving the provision of housing... where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73..."

- 3.5 The NPPF also identifies a new definition of deliverability in the Glossary, as follows:

"To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

- 3.6 Paragraph 67 of the NPPF indicates that planning policies should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and where possible for years 11-15.

National Planning Policy Guidance (PPG)

- 3.7 The relevant sections of the PPG was updated on 13th September 2018, on 20th February 2019 and again on 22nd July 2019 to provide guidance consistent with the current NPPF.

Planning for the Future (March 2020)

- 3.8 It has been announced that the standard method will be reviewed, and a new approach introduced in the spring of 2020 within Planning for the Future. This identifies that the new approach will encourage greater building within and near to urban areas and ensure that the country is planning for the delivery of 300,000 homes per year. This compares to circa the 266,000 homes identified by the current methodology⁵.
- 3.9 It is therefore considered likely that this review will identify a greater minimum local housing need in the majority of LPAs, but particularly so in urban LPAs such as Fareham. Depending on whether this new approach is adopted in national policy by the time of the determination of this appeal and whether this is to be retrospectively applied to five-year land supply assessments, it may therefore be the case that the five-year land supply shortfall is greater than that identified in this report.

Adopted Development Plan

- 3.10 The Development Plan in Fareham Borough includes the Core Strategy (adopted August 2011), the Development Sites and Policies Plan (adopted June 2015) and the Welborne Plan (adopted June 2015).

⁵ As set out in paragraph 7 of the Technical Consultation on Updates to National Planning Policy and Guidance, October 2018.

- 3.11 Policy CS2 of the Core Strategy identifies a housing requirement for Fareham Borough for 3,729 dwellings to be provided in the Borough excluding the Strategic Development Area (SDA) in the period 2006 to 2026. Policy CS13 identifies an additional housing requirement for between 6,500 and 7,500 homes at the SDA within the plan period⁶.
- 3.12 Policy WEL3 of the subsequent Welborne Plan however identifies that only approximately 6,000 homes are allocated at the SDA and will be delivered by 2036, rather than by 2026, as this is all that can be delivered within the SDA⁷.
- 3.13 Policy DSP40 of the Development Sites and Policies Plan sets out a series of criteria for how sites should be considered in the absence of a five-year land supply.

⁶ See paragraph 12 of the Core Strategy Inspectors Final Report.

⁷ See paragraph 3.38 of the Welborne Plan.

4. FIVE-YEAR HOUSING LAND SUPPLY CONTEXT

4.1 The Council's latest assessment of the five-year land supply is contained in the Five-Year Housing Land Supply Position Statement, April 2019 which was presented to Planning Committee on 24th April 2019. This identifies a 4.66 year land supply for the period 1st April 2019 to 31st March 2024, based on a five-year requirement for 2,730 homes and a supply of 2,544 homes which provides a shortfall of 186 homes.

4.2 There have been a number of recent S78 appeal decisions which have been determined in light of the recognised five-year land supply shortfall of the Council. I am aware of two which have considered the extent of the shortfall. In paragraph 90 of the appeal decision regarding Land to the east of Downend Road, Portchester (APP/A1720/W/19/3230015), Inspector Gould identifies that:

"The 5yrHLS evidence put before me shows that there are a significant number of dwellings subject to applications with resolutions to grant planning permission that are subject to unresolved matters, including the execution of agreements or unilateral undertakings under Section 106 of the Act. In many instances those resolutions to grant planning permission are 18 or more months old and I consider they cannot be considered as coming within the scope of the Framework's deliverability definition. I therefore consider that the Council's claimed 4.66 years HLS position is too optimistic and that the appellant's figure of 2.4 years better represents the current situation."

4.3 Similarly, in paragraph 23 of the appeal decision regarding Rear of 77 Burridge Road, Burridge (APP/A1720/W/18/3209865), Inspector Parker identifies that:

"The Council indicated that it was satisfied that the sites listed within its supply calculation would deliver within 5 years. However, it has not provided clear evidence sought by the Framework in relation to at least 1700 dwellings. The information before me does not enable me to reach a definitive figure for the current housing land supply position, but the probability is that it is significantly below that published by the Council, and much closer to that advanced by the appellant."

4.4 According to paragraph 20 of this decision, the appellant considered the position to be 2 years or below.

4.5 The evidence relied upon by the Council remains unchanged and therefore, in accordance with the findings of these Inspectors, the Council is currently able to demonstrate a five-year land supply of significantly less than 4.66 years.

4.6 The Council has acknowledged this in a recent committee report in respect of a planning application at Land at Stubbington Lane, Fareham wherein they state:

"Members will note from the 'Five Year Housing Land Supply Position' report considered at the April 2019 Planning Committee that this Council currently has a housing land supply of 4.66 years. During the latter part of 2019 several appeal decisions were received in which Planning Inspector's considered the Council's 5YHLS position, including the appeal by Miller Homes on land at Winnham Farm (appeal reference: APP/A1720/W/19/3230015). In that appeal decision the Inspector was of a view that the Council's claimed supply figure of 4.66 years was too optimistic, and that the appellant's figure of 2.4 years better represented the situation at the time."

4.7 Therefore, it appeared to be common ground between the Council, every Inspector to have considered this matter and myself that the Council's housing land supply position was significantly below 4.66 years and closer to 2 years at the start of this year.

4.8 Since these appeal decisions, it has however become evident that there is no identified solution to unlocking the infrastructure necessary to support the development of the strategic site at Welborne such that this site can no longer be considered deliverable. This reduces the land supply position even further. Nevertheless, I proceed to consider the precise extent of the shortfall within this report as this may be material.

5. THE FIVE-YEAR REQUIREMENT

The Housing Requirement or Local Housing Need

- 5.1 The Core Strategy which contains the housing requirement was adopted on 4th August 2011 and so the housing requirement is more than five years old. In such circumstances paragraph 73 and footnote 32 of the NPPF identifies that the housing land supply position should be calculated against the local housing need calculated using the standard method.
- 5.2 According to the PPG (24-004), the minimum local housing need identified by the standard method is calculated using the average annual household growth for the next 10 consecutive years identified by the 2014-based household projections. As the five-year land supply is calculated from 1st April 2019, the average household growth should be calculated for the period 2019 to 2029. The 2014-based projections identify that over this period, the average household growth was projected to be 394 households per annum in Fareham Borough.
- 5.3 The PPG (2a-004) then identifies that this should be adjusted based on the affordability of the area using the median workplace-based affordability ratio within a specified formula. Paragraph 15 of the Housing Delivery Test Measurement Rule Book requires that the local housing need should be calculated using the affordability ratio from the previous calendar year, which in the current case is 2018.
- 5.4 In 2018, the latest official statistics indicated that the median workplace-based affordability ratio in Fareham Borough was 9.12 which is the figure which has been used in the Council's Five-Year Housing Land Supply Position Statement. However, these have been subsequently revised to identify that the median workplace-based affordability ratio in 2018 was actually 9.24⁸.
- 5.5 Once this is input to the appropriate formula, this produces an adjustment factor of 1.33, meaning that the average household growth needs to be uplifted by 33% to produce an annual local housing need for 523 homes per annum (hpa).
- 5.6 The PPG (2a-004) proceeds to identify that in certain circumstances this figure may be capped. Where the relevant strategic policies were adopted more than five years ago, as they were in Fareham, the local housing need would be capped

⁸ These figures relate to 2018 which are to be used in the standard method for 2019. The figure identified previously of 9.09 is the most recent figure which relates to 2019 and will be used in the standard method for 2020.

at 40% above the higher of the average household growth or the adopted housing requirement. Given that the annual local housing need of 520hpa is less than 40% above the average household growth being 32% above this, a cap does not apply in Fareham Borough. Therefore, there is a minimum annual local housing need for **523hpa**.

The approach to addressing under-delivery

- 5.7 The PPG (68-031) identifies that the standard method incorporates under-delivery as part of the affordability ratio so there is no requirement to address under-delivery separately.

The buffer

- 5.8 Paragraph 73 of the NPPF identifies that where the position has not been agreed through an annual position statement or a recently adopted plan, as is the case in Fareham Borough, a buffer of 20% should be applied where there is a record of significant under-delivery over the three previous years, but a 5% buffer should apply in all other cases.
- 5.9 Footnote 39 identifies that from November 2018 the record of delivery should be assessed using the Housing Delivery Test. The Housing Delivery Test results indicate that 99% of the number of homes required have been delivered in the period 2016 to 2019 such that there is not a record of significant under-delivery and it is therefore appropriate to apply a **5% buffer**.

The five-year requirement

- 5.10 Based on the preceding analysis, the five-year requirement is calculated in Table 5.1 below against the adopted housing requirement.

Table 5.1 – the five-year housing requirement

A	Annual minimum local housing need	523
B = A x 5	Base five-year requirement 2019-24	2,613
C = B x 1.05	Five-year requirement including 5% buffer 2019-24	2,743

- 5.11 For the purposes of paragraph 73 of the NPPF there is therefore a need for a deliverable supply of at least 2,743 dwellings in the period 2019-24. This is slightly greater than the requirement for 2,730 homes identified in row D of the table in section 4.0 of the Council's Five-Year Housing Land Supply Position statement, owing to the revised affordability information.

6. THE DELIVERABLE SUPPLY

National Policy

6.1 The NPPF identifies that in order for site to be deliverable:

"...sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years."

6.2 The NPPF therefore identifies three pre-conditions which need to be met in order to a site to be considered deliverable, namely that they must be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered within five years.

6.3 The definition then identifies two tests which apply to specified sources of supply to determine whether or not sites are deliverable, namely those in Category A and those in Category B.

6.4 In order for a site to be considered deliverable, it is therefore necessary to meet all three of the pre-conditions and to pass the appropriate test.

6.5 The deliverable supply represents a snapshot in time, namely that which existed at the base-date. Accordingly, where the pre-conditions require that a site is available or suitable now, this indicates that a site was required to have been available or suitable at the base-date, namely 1st April 2019. Similarly, where the pre-conditions require that there is a realistic prospect of completions within five-years, this is the five-year period which runs from the base-date.

6.6 Any sites which subsequently became suitable or available, or which are capable of delivering within five-years of the subsequent determination of a planning

- application will respond to a different five-year requirement and cannot be taken into account. To do so would necessitate consideration of the number of completions which had occurred in the interim (which no longer stand a realistic prospect of delivery as they have already been delivered), and the backlog which has accrued in the intervening period. This information has not been provided by the Council, and so it is not currently possible to adjust the base-date and take account of any planning permissions which have subsequently been granted (unless these were allocated or subject to outline planning permission at the base date and thereby the suitability of these sites had already been established).
- 6.7 The tests identify that for sites to be considered deliverable, those sites within Category A should be considered to be deliverable unless there is a clear evidence that homes will not be delivered within five years (providing the pre-conditions are met), and those within Category B should only be considered deliverable where there is clear evidence that housing completions will begin within five-years (and providing the pre-conditions are met).
- 6.8 This provides for greater balance in the assessment of the deliverable supply. Under the former NPPF it was permissible to assume that all sites were deliverable if there was a realistic prospect of delivery. Taken in combination, such an approach gave rise to an unrealistic cumulative assessment. For example, where there was a 25% chance of a site delivering this may have been considered a realistic prospect. However, with ten such sites, the chances of them all delivering are less than one in a million. The approach of the former NPPF therefore produced unrealistic cumulative assessments of the deliverable supply in a number of Local Planning Authorities across the country.
- 6.9 The revised definition of deliverability addresses this by providing a much more balanced and realistic assessment of the supply, by identifying that Category A sites should be considered deliverable, but that Category B sites should not be considered deliverable unless there is clear evidence that these will actually achieve housing completions within five years. This is likely to result in the delivery from Category A sites being overestimated but may underestimate the delivery from Category B sites which in the round provides for a realistic assessment of the overall supply.
- 6.10 The over-optimism which arises from the inclusion of all Category A sites in the deliverable supply is evident from the fact that of the 14 sites with full planning permission which have either achieved completions or are predicted to achieve

completions in 2019/20 and which are included in the Council's deliverable supply, 3 have taken (or are anticipated to take) more than five-years from the grant of full planning permission until the first completion⁹. These Category A sites would be considered deliverable according to the definition of a deliverable supply notwithstanding that a reasonable proportion do not in fact even achieve the first completion within five-years.

- 6.11 In my view, the use of the word 'will' within the test for Category B sites requires a higher degree of confidence of delivery than within the previous definition which only required that there was a realistic prospect of delivery.
- 6.12 Numerous respondents to the consultation on the draft NPPF identified that the new definition sets a presumption against the deliverability of such sites and that these should only be considered deliverable as an exception. The Planning Officers Society identified that:

"The proposed change would mean that rather than needing to show that there is a reasonable prospect that delivery on sites can happen, LPA's would be required to demonstrate somehow that it definitely will happen. This would be beyond an LPA's control, since only landowners or developers could give the answer, and even then, in many cases they could only indicate their intention or expectation, not say that it will definitely happen." (my emphasis)

- 6.13 Similarly, the Local Government Association identified that:

"The revised definition of 'deliverable' sets an unfairly high test on local planning authorities for sites which do not have a detailed planning permission in place (including sites that have been allocated and subject to a separate examination through the plan-making process), requiring "clear evidence that housing completions will (our emphasis) begin on site within five years". Placing the onus on local planning authorities to do this for each site is unreasonable, and in many cases impossible to do, as sites with outline planning permissions, will often be subject to ownership transactions and revised options for delivery before a final construction programme can be drawn up.

This change in definition would in effect mean, that only sites with detailed planning permissions could make up a five year supply picture, and risks local planning authorities being challenged on existing site allocations

⁹ Including at 16 Botley Road, Park Gate which took 15 years; 3-33 West Street, Portchester which is expected to take 12 years; and New Park Garage, Station Road, Park Gate which is expected to take 10 years.

in local plans based on this new definition.” (my emphasis)

- 6.14 Whilst I do not go as far as these consultees, I agree that the threshold for a Category B site to be included in the deliverable supply has been considerably raised.
- 6.15 In addition to specific deliverable sites, paragraph 70 of the NPPF identifies that a windfall allowance can also be included where there is compelling evidence that they will provide a reliable source of supply, informed by the SHLAA, historic rates and expected future trends.

The Council’s Position

- 6.16 The NPPF was published in July 2018 and contained a new definition of a deliverable site to that within the former NPPF. This definition was clarified in the subsequent revision to the NPPF in February 2019 but remains substantively unchanged.
- 6.17 The accuracy of the Council’s previous trajectories using this definition provide an indication of the reliability of the supply upon which the Council rely. However, as there has only be a single year of completions since the new definition was introduced this provides only a high-level indication.
- 6.18 The Council has produced numerous trajectories since July 2018. The first three were published in September, October and December 2018 and each indicated that there would be 391 completions in 2018/19. The fourth was published in January 2019 and indicated that there would be 327 completions in 2018/19. However, there were in fact only 290 completions in 2018/19. Therefore, in the first year of the trajectory, in which it would be expected that there is the greatest level of knowledge about the likely completions, the trajectories of the Council using the current definition have overestimated the supply on every single occasion by between 13% and 35%.
- 6.19 It is especially notable that in January 2019, 10 months into the monitoring year of 2018/19, when the Council should have had a very good idea of the number of completions that would be achieved in that year, they still overestimated the supply by 13%.
- 6.20 The preceding analysis demonstrates that even in the more certain short-term, the trajectories of the Council are unduly optimistic.

6.21 The current Five-Year Housing Land Supply Position Statement identifies a deliverable supply of 2,544 homes comprising:

- i. 93 homes on small permitted sites (of less than 5 homes) and 63 homes on small permitted sites (of between 5 and 9 homes)¹⁰;
- ii. 469 homes on large sites (of 10 or more homes) with detailed planning permission at the base-date;
- iii. 112 homes on large sites (of 10 or more homes) with outline planning permission at the base-date;
- iv. 827 homes on sites allocated in the development plan¹¹ at the base-date;
- v. 145 homes on sites identified on a brownfield register at the base-date;
- vi. 761 homes on unallocated sites which were the subject of undetermined planning application at the base-date; and
- vii. A windfall allowance of 74 homes.

6.22 The supply of the Council is therefore made up of:

- 625 homes (i and ii) which fall in Category A of the definition of a deliverable site and should therefore be considered deliverable in the absence of evidence to the contrary;
- 1,084 homes (iii, iv, and v) which fall in Category B and should therefore only be considered deliverable where there is clear evidence that completions will begin on site within five years;
- 761 homes (vi) which do not fall in Category A or B; and
- A windfall allowance of 74 homes (vii) which should be considered deliverable where there is compelling evidence that this will provide a reliable source of supply.

¹⁰ It is assumed that none of these comprise major development as they would if they were on sites of 0.5ha or more.

¹¹ Including the 757 identified in the table in section 4.0 and an additional 70 at Heath Road, Locks Heath.

6.23 I address each of these in the following chapters.

7. CATEGORY A SITES

Small permitted sites

- 7.1 I agree with the contribution of 156 homes on small permitted sites to the deliverable supply as set out in Table 7.1 below.

Table 7.1 – the deliverable supply from small permitted sites

	Position of the Council	Position of the Appellant
Small permitted sites	156	156

Large sites with detailed planning permission

- 7.2 Similarly, with one exception as described below, I agree that the 469 homes on large sites with detailed planning permission identified by the Council are deliverable.
- 7.3 1 Station Industrial Park, Duncan Road, Park Gate - The Council include 15 homes in the deliverable supply from this site. The Five-Year Housing Land Supply Position Statement records that this site "remains offices". It continues to be in B1 office use and is used by Foreman Homes as their head office.
- 7.4 This site cannot therefore be described as being available for development now and so does not meet one of the pre-conditions for a deliverable site. This has been confirmed in case law. In paragraph 34ii of the High Court Judgment of *Wainhomes (South West) Holdings Ltd vs the Secretary of State for Communities and Local Government [2013] EWHC 597 (Admin)* the definition of availability is set out. It identifies that:

"The parties are agreed that a site which is, for example, occupied by a factory which has not been derequisitioned, or which is contaminated so that housing could not be placed upon it, is not "available now" within the meaning of the first sentence of Footnote 11. However, what is meant by "available now" is not explained in Footnote 11 or elsewhere. It is to be read in the context that there are other requirements, which should be assumed to be distinct from the requirement of being "available now", though there may be a degree of overlap in their application. This suggests that being available now is not a function of (a) being a suitable location for development now or (b) being achievable with a realistic prospect that housing will be delivered on the site within five years and that development of the site is viable. Given the presence of those additional requirements, I would accept Ms Busch's submission for the Secretary of State: "available

now" connotes that, if the site had planning permission now, there would be no other legal or physical impediment integral to the site that would prevent immediate development" (my emphasis)

- 7.5 Given the continued occupation of the building by a business, there is a physical impediment integral to the site that would prevent immediate development, and therefore this site is not available now and is therefore not deliverable in terms of the NPPF.
- 7.6 The respective positions on large sites with detailed planning permission are set out in Table 7.2 below.

Table 7.2 – the deliverable supply from large sites with detailed planning permission

	Position of the Council	Position of the Appellant
1 Station Industrial Park	15	0
Other sites with detailed planning permission	454	454
Sites with detailed planning permission	469	454

8. CATEGORY B SITES

8.1 Such sites should only be considered deliverable where there is clear evidence that completions will begin on site within five years. As set out in the Burrige decision, the Council has not provided clear evidence to demonstrate that such sites are deliverable. Nevertheless, I have reviewed these sites individually as set out below.

Large sites with outline planning permission

8.2 The Council include 112 homes on two sites which benefited from outline planning permission without an approval of reserved matters at the base-date. Whilst I do not agree that the trajectory of the Council on one of these is realistic, I do agree that it meets the pre-conditions and that it will deliver within five-years and so I agree that this is deliverable. The other site is discussed below.

8.3 Land east of Brook Lane, Warsash – this site gained outline planning permission for the development of up to 85 homes in January 2017. An application for the approval of reserved matters was then submitted in March 2019 but remains undetermined. In May 2019, Natural England identified that the application could have potential significant effects on the Solent Special Protection Areas and Ramsar sites and the Solent Maritime Special Area of Conservation and therefore required that a Habitats Regulation Assessment was undertaken.

8.4 No such assessment has been prepared on behalf of the applicant in the subsequent 10 months. The Council's website indicates that there has been no activity in support of the application since April 2019. It is therefore entirely unclear whether actions are being taken to progress the application or whether the necessary evidence is being prepared on behalf of the applicant to demonstrate that the site is suitable for development.

8.5 In the absence of this necessary evidence, it is not considered that the site can be considered suitable for development now as a result of the potential significant effects on numerous Natura 2000 sites.

8.6 Furthermore, as is the case for the majority of sites, the Council has provided no evidence whatsoever to demonstrate that completions will begin on site as required by the NPPF. The developer, Taylor Wimpey, is not even advertising this site as coming soon on their website.

8.7 Prior to the first completion:

- the HRA will need to be prepared, submitted and reviewed by Natural England;
- potentially, additional information will need to be prepared or the design of the scheme revised to respond to the numerous comments submitted in response to the application;
- the Council will need to determine the application;
- assuming that approval of reserved matters is granted, the technical work to discharge conditions will need to be undertaken;
- applications for the discharge of conditions will need to be prepared, submitted and determined;
- pre-commencement works necessary to discharge relevant conditions and to provide the necessary infrastructure (including sewerage, utilities, internal roads etc) will need to be undertaken;
- planning obligations will need to be fulfilled including making the appropriate financial contributions and potentially providing any infrastructure required by the S106 package;
- the developer will need to market the homes; and
- the residential development can then commence.

8.8 It is not considered that there is a realistic prospect of this being achieved within a year as required by the Council's trajectory, even if there was evidence to support the position of the Council.

8.9 In the absence of any clear evidence that completions will begin on site within five years and given the potential for significant effects on designated sites which may preclude this site from delivering at all, it is not considered that this site is deliverable.

8.10 The respective positions on large sites with outline planning permission are set out in Table 8.1 below.

Table 8.1 – the deliverable supply from large sites with outline planning permission

	Position of the Council	Position of the Appellant
Land east of Brook Lane, Warsash	85	0
Land north of Funtley Road, Funtley	27	27
Sites with outline planning permission	112	27

Allocations

- 8.11 The Council include 827 homes on sites which are allocated in the development plan, but which did not benefit from planning permission at the base-date. As above, the Council has provided no evidence whatsoever to demonstrate that completions will begin on site within five-years on the majority of these, let alone clear evidence. As a result, I do not consider that the majority of these can be demonstrated to be deliverable. Each is discussed in turn below.
- 8.12 Heath Road, Locks Heath – this site was allocated in the Development Sites and Policies Plan for 70 homes in June 2015. An outline planning application for 70 homes was submitted in November 2017 and the Council resolved to grant planning permission in February 2018 subject to a S106 agreement. In the intervening 25 months no agreement has been reached on the S106 and planning permission has not been granted. There is absolutely no evidence from the parties to the S106 agreement as to how this is progressing and whether or how quickly the remaining issues can be overcome.
- 8.13 As set out above, the Council has provided absolutely no evidence, clear or otherwise, that completions will begin on site within five years. In particular, there is no evidence of the developer’s proposed delivery intentions.
- 8.14 Furthermore, even if outline planning permission was granted imminently, not that there is any evidence that this will be the case, the Second Edition of the Start to Finish report, Lichfields, February 2020 identifies in Figure 3 that it takes on average circa 3 years from the grant of outline planning permission until the first completion¹². If outline planning permission was granted forthwith and assuming that this average lead-in time was achieved, the first completions wouldn’t be achieved until the start of 2023/24.

¹² Whilst these lead-in times relate to sites of 500 or more homes, the Start to Finish report demonstrates that larger sites are likely to experience shorter lead-in times.

8.15 Whilst this is only an average, it provides a useful gauge to consider the trajectory of the Council. The Council consider that this site will deliver the first completions in 2020/21 (i.e. within a year). In this time, it will be necessary for:

- the S106 to be agreed;
- the technical work necessary to discharge conditions to be undertaken;
- applications for the discharge of conditions to be submitted and determined;
- the site to be marketed and sold to a developer with the necessary legals completed;
- applications for the approval of reserved matters to be prepared, submitted, consulted upon and determined;
- pre-commencement works necessary to discharge relevant conditions and to provide the necessary infrastructure (including sewerage, utilities, internal roads etc) will need to be undertaken;
- planning obligations will need to be fulfilled including making the appropriate financial contributions and potentially providing any infrastructure required by the S106 package;
- the developer will need to market the homes; and
- the residential development can then commence.

8.16 It is not considered that there is any prospect, realistic or otherwise, of this being achieved in a year as assumed by the Council.

8.17 In the absence of any clear evidence that completions will begin on site within five years and given the significant amount of work which remains to be undertaken before the first housing completion could realistically be delivered, it is not considered that this site is deliverable.

8.18 Wynton Way, Fareham – this site was allocated in the Development Sites and Policies Plan in June 2015 for 10 homes. No planning application has even been submitted on this site in the subsequent almost 5 years.

- 8.19 The Five-Year Housing Land Supply Position Statement indicates that pre-application discussions have taken place. Pre-application discussions are by their nature confidential and so cannot be relied upon as providing clear evidence.
- 8.20 The Council indicate that the pre-application discussions have identified a yield of 18 homes on this site and the Council therefore rely upon this site to deliver 18 homes, notwithstanding that it has only been tested and found to be suitable for 10 homes in the development plan.
- 8.21 The Council also indicate that the site is owned by the County Council, but negotiations will be undertaken to acquire the site by an unnamed party. This is again far from clear evidence as it relies upon negotiations which are yet to be concluded (or potentially started) and the acquisition of the site by a party that is potentially not a developer.
- 8.22 Given the absence of clear evidence, particularly the absence of the delivery intentions of the developer including start and build-out rates, this site should not be considered deliverable.
- 8.23 335-337 Gosport Road, Fareham – this site was allocated in the Development Sites and Policies Plan in June 2015 for 10 homes. No planning application has even been submitted on this site in the subsequent almost 5 years.
- 8.24 The Council indicate that the pre-application discussions have identified a yield of 12 homes on this site and the Council therefore rely upon this site to deliver 12 homes, notwithstanding that it has only been tested and found to be suitable for 10 homes in the development plan.
- 8.25 The Council also indicate that the site is owned by the County Council. It will therefore be necessary for this site to be acquired by a developer before development can commence. There is no evidence that the site is being marketed by the County Council.
- 8.26 Given the absence of clear evidence, including the absence of any evidence that it will be sold to a developer, this site should not be considered deliverable.
- 8.27 Stubbington Lane, Hill Head - this site was allocated in the Development Sites and Policies Plan in June 2015 for 10 homes. No planning application has even been submitted on this site in the subsequent almost 5 years.

- 8.28 The Council indicate that the pre-application discussions have identified a yield of 12 homes on this site and the Council therefore rely upon this site to deliver 12 homes, notwithstanding that it has only been tested and found to be suitable for 10 homes in the development plan.
- 8.29 The Council identify that this site is owned by the Borough Council and that it is expected to deliver affordable housing in the short-term. However, there is absolutely no evidence as to how this will be achieved such as when a planning application will be submitted, or whether an affordable housing provider is lined up to deliver the housing.
- 8.30 Given the absence of clear evidence, this site should not be considered deliverable.
- 8.31 Sea Lane, Hill Head - this site was allocated in the Development Sites and Policies Plan in June 2015 for 5 homes. No planning application has even been submitted on this site in the subsequent almost 5 years.
- 8.32 Without any explanation, the Council include 8 homes in the deliverable supply, notwithstanding that this has only been tested and found to be suitable for 5 homes in the development plan.
- 8.33 The Council has provided absolutely no evidence in support of this site, such that it should not be considered deliverable.
- 8.34 Corner of Station Road, Portchester – this site was allocated in the Development Sites and Policies Plan in June 2015. A full planning application was submitted in February 2016 and the Council resolved to grant planning permission in August 2016 subject to a S106 agreement. In the subsequent 45 months the S106 has not been agreed and full planning permission has not been granted. There is absolutely no evidence from the parties to the S106 agreement as to how this is progressing and whether or how quickly the remaining issues can be overcome.
- 8.35 The Council identify that they have recently acquired the site and that delivery is expected in the short-term. However, there is absolutely no evidence as to how this will be achieved such as when a planning application will be submitted, or who will deliver the site and whether contracts are in place to facilitate this.
- 8.36 Given the absence of clear evidence, this site should not be considered deliverable.

- 8.37 Welborne – this site was allocated in the Welborne Plan in June 2015 for a mixed-use development including approximately 6,000 homes and the remodelling of Junction 10 of the M27. An outline planning application was submitted in March 2017 and the Council resolved to grant planning permission in October 2019 subject to a S106.
- 8.38 There is some evidence in support of the deliverability of this site. The applicant has submitted a number of Infrastructure Delivery Plans in support of the application to outline the intended delivery rates for this site. The first was submitted in March 2017 (IDP17) and this identified that the first 120 homes would be delivered in 2018/19 with a further 180 in 2019/20. Development has not even commenced in April 2020. It is therefore apparent that whilst the Infrastructure Delivery Plans provide an indication of the developer's aspirations for the site, they do not provide clear evidence that completions will begin on site within five years as required by the NPPF.
- 8.39 It is also demonstrable that the Infrastructure Delivery Plans provide an overly optimistic view of the trajectories, as is commonly the case with information provided by applicants. The fact that such information is overly optimistic has been identified in numerous S78 appeal decisions including in paragraph 28 of the appeal decision at Land South of Filands, Malmesbury (APP/Y3940/A/12/2183526) which states:
- “Relying heavily on largely unsupported land owner, developer and agent, assurances as appropriate proof of when sites are likely to come forward, as the LPA seems to be doing, is not to my mind sufficient evidence of deliverability.”**
- 8.40 The IDP17 was superseded by a new Infrastructure Delivery Plan in December 2018 (IDP18) which identified that the first 30 homes would be completed in 2020/21 and this trajectory is maintained in the latest Infrastructure Delivery Plan of March 2019 (IDP19) which is now a year old.
- 8.41 The IDP19 identified that the sequencing will be subject to the outcome of the outline planning application and subsequent reserved matters applications and depending on these it “may commence in 2019/20”. This has not occurred as a result of the fact that outline planning permission has still not been granted. Therefore, it is apparent that the indicative housing trajectory of the IDP19 has been superseded by events.

8.42 The IDP19 identified that by 31st March 2024:

- 690 homes would have been delivered;
- the development of Village Centre/s and employment area/s would have commenced;
- the new Junction 10 of the M27 including new slip roads off the M27 and A32, Welborne Approach, Broadway and four associated roundabouts would have been delivered;
- the A32 North roundabouts would have been delivered;
- Welborne Way would have been delivered;
- most of Dashwood Boulevard and Dashwood Avenue have been delivered;
- Knowle Road improvements have been implemented;
- part of West Way has been delivered;
- other off-site highway works have commenced;
- connected pedestrian and cycle routes to key community assets have been delivered;
- overhead powerlines have been undergrounded;
- water mains have been diverted (if required);
- an onsite drainage solution has been delivered;
- the Village Centre Community Building has been delivered;
- a Health Outreach Facility has been provided within the retail units;
- children's play space has been delivered within neighbourhoods;
- strategic planting to the northern, north-eastern and south-western boundaries has been provided;
- structural planting associated with the highways infrastructure has been provided;

- buffer planting associated with Dashwood SANG and Blakes Copse has been provided;
- Dashwood Park and Welborne Green have been provided; and
- the playing fields associated with the primary school have been provided.

8.43 Even if work had commenced in 2019/20 as assumed in the IDP19, this does not appear to be an achievable aspiration. However, given that work was not commenced in 2019/20 this is clearly no longer realistic.

8.44 The Council resolved to grant outline planning permission subject to a S106 which was required to secure:

- **"The creation of an Estate Management Company...;**
- **The appointment of a New Community Development Worker for a period of not less than ten years;**
- **Provision for an Education Steering Group;**
- **Contribution and land for the delivery of three primary schools;**
- **Contribution and land for the delivery of one secondary school;**
- **A Community Use Agreement(s) for the school(s) facilities for public use outside of the times needed for educational use;**
- **Nursery and pre school marketing strategy;**
- **Provision of the Local Centre;**
- **Provision of the District Centre;**
- **Provision of healthcare facilities;**
- **Provision of the Community Hub;**
- **Delivery of Green Infrastructure...;**
- **GI Delivery and management arrangements;**
- **Delivery of the Temporary SANGS Strategy;**
- **Provision of SANGS;**
- **In perpetuity management of SANGS including step-in rights by the Estate Management Company;**
- **SRMP Contribution;**
- **Public Transport – BRT provisions on site and contributions;**
- **Safeguarding of the Rail Halt Land;**

- A32 access works;
- Off site Local Highway Network mitigation and safety schemes;
- Framework residential travel plan;
- Neighbourhood travel plans;
- Framework employment travel plan;
- Safeguarding the land for the Household Waste Recycling Centre;
- Contribution towards the Household Waste Recycling Centre to include a proportionate cost of the legal fees;
- Affordable housing...;
- Self Build Housing;
- Passivhaus where viability allows;
- Lifetime homes where viability allows;
- Extra Care accommodation;
- Business incubation centre;
- Employment and training plan for construction;
- Equalisation arrangements for the Sawmills site;
- Public access to the site;
- Improvements to existing rights of way;
- Closure, stopping up and diversion of existing rights of way."

8.45 This extensive list of proposed planning obligations will clearly take a considerable amount of time to negotiate and put in place within a S106 agreement.

8.46 Condition 52 as amended to the resolution to grant planning permission also states:

"No development shall take place on site other than that related to the delivery of Junction 10 until details of the sources of all the funding necessary to carry out the Junction 10 works has been submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved details."

8.47 The committee report indicates that the remodelling of Junction 10 will cost between £80 million and £90 million. A report was presented to the Executive Member for Economy, Transport and Environment of Hampshire County Council on 14th January 2020 which identified that:

“Whilst there has been significant progress over the last year on the scheme development, the report outlines a fundamental impasse in the progression of the business case and scheme development work, pending resolution of critical issues relating to significant gap funding, and the approach to scheme delivery. These difficulties mean it is not possible to progress the Full Business Case development at this time.”

8.48 The committee report continues to identify a funding gap of around £55 million to £70 million. It is therefore apparent that there are significant barriers to the delivery of this site for which no solution has currently been identified. In the light of such constraints, this site cannot be considered to be deliverable.

8.49 Even once the S106 is agreed and outline planning permission is granted, it will be necessary for:

- the technical work necessary to discharge conditions to be undertaken;
- applications for the discharge of conditions to be submitted and determined;
- applications for the approval of reserved matters to be prepared, submitted, consulted upon and determined;
- pre-commencement works necessary to discharge relevant conditions and to provide the necessary infrastructure (including sewerage, utilities, internal roads etc) will need to be undertaken;
- planning obligations will need to be fulfilled including making the appropriate financial contributions, preparing the necessary strategies/plans and delivering the infrastructure (including some of that listed above) in accordance with the appropriate trigger points;
- the developer will need to market the homes; and
- the residential development can then commence.

8.50 Given the extent of barriers to overcome it is not considered that there is a realistic prospect of the first completions being achieved for a number of years.

8.51 The Start to Finish report identifies 6 strategic scale (of more than 1,000 homes) sites in Hampshire. I have been able to identify the relevant dates for 4 of

these¹³, and on these the average time it took from gaining a resolution to grant planning permission until outline planning permission was granted was 1 year and 11 months, ranging from 1 year and 1 month at Picket Twenty (Test Valley) to 3 years and 7 months at Elvetham Heath (Hart).

8.52 On average across the strategic scale sites in Hampshire, it then took 3 years and 2 months from the grant of outline planning permission until the first completion was achieved¹⁴ which compares with the average of 2.9 years (or 2 years and 11 months) achieved nationally identified in the Start to Finish report. This period ranged from 1 year and 4 months at Land East of Icknield Way (Test Valley) to 5 years and 2 months at Velmead Farm (Hart).

8.53 The Start to Finish report also identifies in Figure 4 that from the approval of the first application for the approval of reserved matters until the first completion would take 2.3 years (or 2 years and 4 months) as part of the 2 years and 11 months above.

8.54 If these stages are considered jointly, from gaining a resolution to grant planning permission it has taken on average 4 years and 10 months until the first completion is achieved on strategic scale sites in Hampshire, ranging from 2 years and 9 months at Land East of Icknield Way (Test Valley) to 7 years and 3 months at Elvetham Heath (Hart).

8.55 Therefore, notwithstanding the significant barriers which remain to be addressed at Welborne and the absence of any clear evidence as to how and when these will be overcome, if it was assumed that:

- the shortest recorded period for a S106 agreement and the shortest recorded period from the grant of outline planning permission until the first completion was achieved, the first completions would not be achieved at Welborne until March 2022;

¹³ The site at West of Waterlooville does not appear to have gained a resolution to grant planning permission and so no corresponding information can be discerned for this site; and the site at Velmead Farm was permitted in 1984 and as such I have been unable to identify the relevant committee reports and dates.

¹⁴ The date of the first completion is taken to be the date of the first sale of individual properties where this information is available as it is on all but one of the sites, and on the other (Velmead Farm) it is taken to be the mid-point of the year in which the first completions were achieved according to the Start to Finish report.

- the shortest recorded period from gaining a resolution to grant outline planning permission until the first completion was achieved, the first completions would not be achieved at Welborne until July 2022;
- the average recorded period for a S106 agreement and the shortest recorded period from the grant of outline planning permission until the first completion was achieved, the first completions would not be achieved at Welborne until November 2024;
- the average recorded period from gaining a resolution to grant outline planning permission until the first completion was achieved, the first completions would not be achieved at Welborne until August 2024.

8.56 However, the Council assume that the first completion will be achieved in circa 10 months' time¹⁵ in January 2021 notwithstanding that this site does not even benefit from outline planning permission currently. This would require an unprecedented lead-in time for a strategic scale site in Hampshire and would require the lead-in time (from gaining resolution to grant planning permission) to be approximately one quarter of the length of time it takes on average on strategic scale sites locally or nationally. This is simply unrealistic in my opinion.

8.57 In the absence of any up-to-date or realistic evidence, and given the absence of any committed funding solution to the remodelling of Junction 10 which has only recently been identified, I do not consider that this site can be considered deliverable.

8.58 The respective positions on allocations are set out in Table 8.2 below.

¹⁵ Based on 15 completions per month or 180 per annum as assumed in the first year of the Council's trajectory.

Table 8.2 – the deliverable supply from allocations

	Position of the Council	Position of the Appellant
Heath Road, Locks Heath	70	0
Wynton Way, Fareham	18	0
335-337 Gosport Road, Fareham	12	0
Stubbington Lane, Hill Head	12	0
Sea Lane, Hill Head	8	0
Corner of Station Road, Portchester	17	0
Welborne	690	0
Allocated sites	827	0

Sites identified on the brownfield land register

8.59 The Council include 145 homes on two sites which are identified on Part 1 of the Brownfield Land Register.

8.60 In order to be eligible for inclusion on the register, Regulation 4 of Section 14A of the Planning and Compulsory Purchase Act 2004 requires that a site must be:

- at least 0.25ha or capable of supporting at least 5 dwellings;
- suitable for residential development as it is allocated, has planning permission, has permission in principle, or is suitable in the opinion of the LPA having regard to adverse impacts and any relevant representations received;
- available for residential development as the relevant owner or developer has expressed an intention to sell or develop the land, or is available in the opinion of the LPA taking account of publicly available information and any relevant representations received;
- achievable such that in the opinion of the LPA development is likely to take place within 15 years having regard to publicly available information and any relevant representations received.

8.61 It is therefore apparent from the Regulations that in order for a site to be included on the register it need not be deliverable, as there is no requirement for sites to be suitable now, available now or to have a realistic prospect of delivery within five-years. All that is required is that such sites are developable within 15 years.

- 8.62 Furthermore, the suitability, availability and achievability of sites should be informed by public consultation. However, no such public consultation has been undertaken on sites identified on Part 1 of the register in Fareham. In the absence of any such consultation, including with statutory consultees and members of the public, with a final conclusion having been reached in the light of expert technical and/or local responses, there would need to be compelling evidence that these sites offer suitable locations for development as would be the case on sites which have been examined either through a Local Plan examination or the grant of planning permission.
- 8.63 In this context, the PPG (68-014) indicates that only sites identified on Part 2 of the Brownfield Land Register should be included in the deliverable supply. To be included in Part 2 of the register it is necessary for sites to be subject to consultation to ensure that these do offer a suitable location for development and on this basis, they would meet one of the pre-conditions for a deliverable site.
- 8.64 The NPPF does not preclude the inclusion of Part 1 sites in the deliverable supply. However, as identified above, in order to include these, in addition to the need for clear evidence that completions will begin on site within five years, there would need to be sufficient evidence for a decision-taker to reach a conclusion on the suitability of the site for development equivalent to that which would arise in support of the approval of a planning permission, an allocation in a Local Plan, or the grant of permission in principle through inclusion on Part 2 of the register.
- 8.65 The individual sites are considered below.
- 8.66 Fareham Magistrates Court – the Council include 45 homes in the deliverable supply on this site. The Five-Year Housing Land Supply Position Statement provides absolutely no evidence, let alone clear evidence that completions will begin on site within five years, other than noting that an outline planning application has been received.
- 8.67 The outline planning application was submitted in November 2018 and was subject to consultation. The latest consultation response was received in May 2019 and there has been no further progress on the application since this time. There is no evidence as to why the application has not progressed, but this could be symptomatic of a technical issue which remains to be resolved, and/or that the applicant is no longer actively progressing the scheme.

- 8.68 Furthermore, even assuming that the applicant is progressing the scheme and that any remaining issues can be satisfactorily resolved, such that outline planning permission is granted, it will remain necessary to undertake the necessary technical work to discharge conditions including an intrusive site investigation as requested by Environmental Health, to sell the site to a developer, prepare, submit and determine applications for the approval of reserved matters, and undertake pre-commencement works prior to commencing development. There is no evidence of the applicant's intentions for this site to demonstrate that it is even intended that this will be achieved by 31st March 2024. The Council nevertheless assume that all of this will occur with a year which I consider to be unrealistic.
- 8.69 Given the absence of clear evidence, particularly the absence of the delivery intentions of the developer including start and build-out rates, this site should not be considered deliverable.
- 8.70 Warsash Maritime Academy - the Council include 100 homes in the deliverable supply on this site. The Five-Year Housing Land Supply Position Statement indicates that there has been a request for a screening opinion on this site but provides no evidence, let alone clear evidence, that completions will begin on site within five years.
- 8.71 In response to the request for a screening opinion:
- Natural England identified that the proposed development could have significant direct and indirect impacts upon the Lee-on-the-Solent to Itchen Estuary Site of Special Scientific Interest, the Solent Maritime Special Area of Conservation, the Solent and Southampton Water Special Protection Area, and the Solent and Southampton Ramsar Site, and requested that either an Environmental Statement was required to consider these or that in the absence of this a detailed assessment of these potential impacts is undertaken in support of any planning application;
 - Hampshire County Council identified that there would be a need for a full Transport Assessment and a Travel Plan;
 - Hampshire County Council identified that the likely significant ecological effects on the Solent and Southampton Water Special Protection Area, the

Solent and Southampton Ramsar Site, the Solent Maritime Special Area of Conservation, and the Lee-on-the-Solent to Itchen Estuary Site of Special Scientific Interest are likely to trigger the requirement for requirement for an Environmental Statement.

8.72 The Council concluded that an Environmental Statement was required in March 2019. It is therefore apparent that a significant amount of work is required before this site can be considered to offer a suitable location for development and accordingly the site cannot be considered to be deliverable.

8.73 The respective positions on allocations are set out in Table 8.3 below.

Table 8.3 – the deliverable supply from sites identified on a Brownfield Land Register

	Position of the Council	Position of the Appellant
Fareham Magistrates Court	45	0
Warsash Maritime Academy	100	0
Sites identified on a Brownfield Register	145	0

9. SPECIFIC SITES WHICH ARE NOT WITHIN CATEGORY A OR B

- 9.1 The Council include 761 homes on sites which are not identified within the definition of a deliverable site and which are not windfall development as defined by paragraph 70 of the NPPF.
- 9.2 The definition of a deliverable site within the NPPF provides two lists of sources of supply which are capable of being considered deliverable. The sites included in these lists comprise sites which have planning permission, which are allocated, or which have been identified on the brownfield register or which have a grant of permission in principle. All other non-windfall sites are, by definition, not capable of being considered deliverable.
- 9.3 This is confirmed in the PPG (68-007) which identifies that beyond those sites in Category A which are considered deliverable in principle, only those sites in Category B can be considered deliverable when there is clear evidence. Similarly, the PPG (68-014) identifies the evidence required in Annual Position Statements for each source of supply and these are limited to those contained within the closed list again indicating that other sources of supply should not be considered deliverable.
- 9.4 If other sources of supply were to be considered, it would be necessary for a decision-taker either to apply one of the tests to a source of supply to which it does not relate, or to invent a new test of deliverability. Either would require the decision-taker to misapply or to invent national policy.
- 9.5 Only sites contained in Category A and B sites can potentially be demonstrated to offer a suitable location for development now in light of the necessary consultation and a final decision reached by the Council through the grant of planning permission supported by the necessary planning obligations and conditions, the adoption in a Local Plan¹⁶, the grant of permission in principle, or potentially identification on a brownfield register. Other sources of supply, such as emerging Local Plan allocations or sites subject to undetermined planning applications have not been subject to the necessary rounds of consultation (including with statutory consultees) and a final conclusion reached on their suitability or otherwise, such that they cannot be considered to be suitable now and therefore they cannot be considered to be deliverable.

¹⁶ Following receipt of an Inspector's Final Report which has considered the suitability or otherwise of the site.

- 9.6 Where a site has gained a resolution to grant planning permission, this is contingent upon planning obligations being agreed which are necessary for the development to be regarded as suitable. In the absence of agreement on these obligations, the site by definition does not provide a suitable location for the proposed development.
- 9.7 The fact that the definition provides a closed list has also been the consistent finding of every S78 decision-taker of which I am aware (with a single exception) as follows:
- Woolmer Green (APP/C1950/W/17/3190821) – which identifies that the definition provides a closed list in paragraph 30, particularly excluding unpermitted sites in paragraph 31 and emerging allocations in paragraph 33 and;
 - Woolpit (APP/W3520/W/18/3194926) – which identifies that the definition identifies the list of qualifying sites in paragraph 65, and then excludes unallocated and unpermitted sites, including those subject to a resolution to grant planning permission, in paragraph 67;
 - Bures Hamlet (APP/Z1510/W/18/3207509) – which excludes unpermitted sites, including those subject to a resolution to grant planning permission, in paragraph 62;
 - West Bergholt (APP/A1530/W/18/3207626) – which excludes emerging allocations and sites subject to undetermined planning applications in paragraph 46¹⁷;
 - Winsford (APP/A0665/W/14/2212671) – in this recovered appeal decision, the Inspector recommended that sites outside of the closed list could be included in paragraph 365 of their report, but the Secretary of State concluded that the sites subject to undetermined planning applications included by the Inspector should not be included in paragraph 18 owing to the fact that these are outside of the closed list and there was not clear evidence that undetermined planning applications would deliver given the need for legal agreements and reserved matters;

¹⁷ I was a witness at this inquiry and the only evidence presented against the inclusion of these sites was that as a matter of principle they were not capable of being considered deliverable.

- Thrapston (APP/G2815/W/19/3232099) – which excludes emerging allocations and undetermined planning applications in paragraph 36 and costs were awarded against the Council for seeking to rely upon sites outside of the closed list.
- 9.8 The one exception to this consistent finding of Inspectors and the Secretary of State of which I am aware was reached in an appeal decision at Charminster (APP/D1265/W/18/3206269) which was heard prior to the publication of the Bures Hamlet, West Bergholt, Winsford and Thrapston appeals. I was a witness at this appeal and gave five-year land supply evidence at a round table session which was not subject to cross-examination. In paragraph 80 of this appeal decision, the Inspector concluded that sites outside of the closed list could be included without explaining why she adopted a different approach to the findings of every other S78 Inspector presented to that appeal including the Woolmer Green and Woolpit Inspectors and by finding that the PPG is at odds with the NPPF. In accordance with the finding of every other S78 Inspector and the Secretary of State, I do not consider that there is any such tension between the PPG and the NPPF and I therefore afford this appeal decision very little weight on this matter.
- 9.9 It should be noted that the Thrapston appeal decision is currently the subject of a legal challenge on the basis that the Council, having accepted that the definition of a deliverable site was a closed list at the hearing as recorded in paragraph 9 of the costs decision, now consider that it is not a closed list. The Secretary of State has conceded that the appeal decision should be quashed but the decision is being defended by the Interested Party (the Appellant).
- 9.10 The above appeal decisions also repeatedly identify that it is the status of the site at the base-date which determines how the deliverability of the site should be assessed¹⁸, namely that a site must have been available at the base-date, offered a suitable location for development at the base-date and been achievable within five-years from the base-date.
- 9.11 Nevertheless, the Council rely upon the delivery of 761 homes on sites which are subject to undetermined planning applications upon which a resolution to grant has been obtained directly contrary to the findings of the Secretary of State¹⁹ and

¹⁸ See paragraph 31 of the Woolmer Green decision, paragraph 67 of the Woolpit decision, and paragraph 62 of the Bures Hamlet decision.

¹⁹ See paragraph 18 of the Winsford decision.

- numerous Inspectors²⁰. Indeed, in paragraph 18 of the Winsford appeal decision the Secretary of State concluded that such sites were not deliverable given the outstanding issues of the need for legal agreements and agreements on reserved matters. The Secretary of State discounted such sites from the deliverable supply even where they had subsequently gained outline planning permission as recorded in paragraph 367 of the Inspector's report. Therefore, even if the definition of a deliverable site does not provide a closed list per se, contrary to the PPG and the interpretation of virtually every decision-taker, sites which remained subject to the agreement of a S106 package at the base-date should not be considered deliverable according to the Secretary of State.
- 9.12 These sites cannot be included in the deliverable supply according to the NPPF, PPG, the findings of virtually every Inspector and the Secretary of State. Nevertheless, I consider these below. I consider groups of these jointly where they share similar characteristics.
- 9.13 Land at Brook Lane, Land East of Brook Lane, Land South of Greenaway Lane and East & West of 79 Greenaway Lane, Warsash – these four sites are all in close proximity to one another to the west of Warsash. There are four separate undetermined outline planning applications providing a total of 507 homes and supporting infrastructure, each of which has gained a resolution to grant outline planning permission. All of these sites have an outstanding need for legal agreements and reserved matters and so should not be considered deliverable according to the conclusions of the Secretary of State in paragraph 18 of the Winsford decision.
- 9.14 The Land at Brook Lane and the Land East of Brook Lane both gained resolutions to grant planning permission in January 2018, and the Land South of Greenaway Lane gained a resolution to grant planning permission in May 2018. All of these applications were reviewed in October 2018 and gained resolutions to grant planning permission subject to S106 agreements all of which are required to secure:
- Financial contributions to secure satisfactory mitigation of the 'in combination' effects that the increase in residential units cause through

²⁰ See paragraph 31 of the Woolmer Green decision, paragraph 67 of the Woolpit decision, paragraph 62 of the Bures Hamlet decision, paragraph 46 of the West Bergholt decision, and paragraph 36 of the Thrapston decision.

increased recreational disturbance on the Solent Coastal Special Protection Areas;

- Financial contributions towards highway improvements to the highway network resulting from the impact of the developments;
- The provision of open space, to the Council, including provision for its maintenance;
- A financial contribution towards the delivery of a play area and associated maintenance;
- Vehicular, pedestrian and cycle access to adjoining land;
- A Travel Plan and related monitoring cost and bond;
- Financial contributions towards education.

9.15 Additionally, the resolutions to grant outline planning permission were given subject to the following site-specific obligations being agreed:

- Payment towards a Traffic Regulation Order on Brook Lane and Lockwood Road to install parking controls required for Land South of Greenaway Lane;
- The provision of ecological corridors and subsequent maintenance arrangements for Land South of Greenaway Lane;
- The provision of two additional hibernacula on the receptor site for Land South of Greenaway Lane;
- The delivery of 35% affordable housing for Land South of Greenaway Lane and 40% affordable housing for Land at Brook Lane and Land East of Brook Lane.

9.16 East & West of 79 Greenaway Lane gained a resolution to grant planning permission in June 2018 and this was similarly reviewed in October 2018 requiring a S106 to secure financial contributions to secure satisfactory mitigation of the 'in combination' effects that the increase in residential units would cause through increased recreational disturbance on the Solent Coastal SPAs.

- 9.17 It is therefore evident that not only are there significant obligations which remain to be agreed to enable the sites to be considered to provide suitable locations for the proposed developments, it has also already taken 1 year and 5 months to seek agreement on these matters but they have been unable to be agreed and accordingly outline planning permission has not been able to be granted.
- 9.18 The Council has provided absolutely no evidence, let alone clear evidence, that completions will begin on three of these sites within five years. Accordingly, these should not be considered deliverable even if outline planning permission had been granted at the base-date.
- 9.19 On the remaining site, at Land South of Greenaway Lane, the Council has alluded to the promoter having provided a trajectory, but the Council has delayed this by one year. This trajectory does not appear to be available in the public domain and so I do not consider this to provide clear evidence, but more importantly, the trajectory upon which the Council rely is clearly unrealistic as it must assume that the first completions would be achieved in 2019/20 notwithstanding that in March 2020 this site does not even benefit from outline planning permission. In the absence of any publicly available clear or realistic evidence, I consider that this site should not be considered deliverable even if it benefited from outline planning permission and therefore fell within the closed list.
- 9.20 The Council's trajectory assumes that each of these four sites will achieve circa half a year's completions in 2020/21. Even if these sites were considered capable of inclusion in the deliverable supply contrary to the NPPF, this would require the S106 negotiations to conclude and outline planning permissions to be granted. It would then also require that the technical work in support of the discharge of conditions is undertaken including for example written schemes of archaeological investigation and intrusive site investigations, applications for the discharge of conditions are submitted and approved, applications for the approval of reserved matters are prepared, submitted and determined, planning obligations are fulfilled, utilities connections secured, access arrangements and internal roads completed, other pre-commencement works are completed, development commenced and the first completions achieved in circa 6 months. I consider that this is simply unrealistic.

- 9.21 The Start to Finish report identifies that even once outline planning permission is granted on a site of 500-999 homes²¹ on average the first completion would be expected to occur 3.1 years later (or 3 years and 1 month) as compared to the 6 months assumed by the Council.
- 9.22 Given that these sites should not be considered deliverable even if there is clear evidence according to the NPPF, PPG, virtually every S78 Inspector and the Secretary of State, and given that there is no clear or realistic evidence in support of these sites, they should not be considered deliverable.
- 9.23 Land South of Funtley Road, Funtley; Southampton Road (Reside); and Egmont Nurseries, Brook Avenue – these three sites are distant from one another but are considered jointly as they have the same planning status. Each of them benefits from a resolution to grant outline planning permission subject to a S106 agreement. As recorded by the Secretary of State in paragraph 18 of the Winsford decision such sites should not be considered deliverable.
- 9.24 The outline planning application for 55 homes, a community building and a shop at Land South of Funtley Road gained a resolution to grant outline planning permission in July 2018 subject to a S106 agreement which secures:
- The delivery of 40% affordable housing;
 - Three custom-built properties;
 - The provision of a pedestrian and cycle public right of way through the site and associated works to upgrade the bridge over the M27 motorway (including a structural survey) and commuted sum for future maintenance;
 - The provision of laying out and transfer of community park land to the Council and a financial contribution towards the capital costs of establishing the park and associated ongoing maintenance costs;
 - The provision of public open space including a LEAP, a financial contribution towards associated maintenance costs and transfer of the public open space to the Council;

²¹ It should be noted that these four sites comprise 507 homes, although this comprises four separate planning applications and so the average lead-in times may vary accordingly.

- The details of the design, delivery and maintenance of SUDs on and off site;
- A financial contribution towards the Solent Mitigation Partnership in order to mitigate the 'in combination' effects that an increase in residential units on the site would cause through increased recreational disturbance on the Solent Coastal SPAs;
- A financial contribution towards the production of school travel plans in the area;
- A financial contribution towards the revision of the existing traffic regulation order to allow the speed limit restrictions on Funtley Road to be amended;
- Submission and implementation of a travel plan;
- Funding and land for provision of community building and associated management arrangements.

9.25 The outline planning application for approximately 105 homes at Southampton Road gained a resolution to grant outline planning permission in December 2018 subject to a S106 agreement which secures:

- The provision and transfer of the areas of open space, wildlife corridor and buffer zones to the Council including associated financial contributions for its future maintenance;
- A financial contribution towards the delivery of a play area and associated maintenance;
- A financial contribution towards the Solent Recreation Mitigation Partnership;
- The delivery of 40% units as on-site affordable housing with the type, size, mix and tenure to be agreed to the satisfaction of officers;
- Vehicular, pedestrian and cycle connectivity access to adjoining land for members of the public through the site in perpetuity;
- A financial contribution towards education provision;

- A financial contribution towards mitigating offsite highway impacts at Segensworth Roundabout, Titchfield Park Road and any physical or educational measures required to improve safety at the A27 controlled crossing;
- A travel plan and related monitoring cost and bond.

9.26 The outline planning application for 8 homes and the creation of a paddock at Egmont Nurseries gained a resolution to grant outline planning permission in December 2018 subject to a S106 agreement which secures:

- A financial contribution to secure satisfactory mitigation of the 'in combination' effects that the increase in residential units on the site would cause through increased residential disturbance on the Solent Coastal SPAs;
- A financial contribution towards the off-site provision of affordable housing.

9.27 It is therefore apparent that the suitability of these sites for the proposed residential developments is entirely dependent upon securing planning obligations including to mitigate their potential effect on Natura 2000 sites. In the absence of such obligations, these sites do not offer a suitable location for the proposed developments and so they should not be considered to be deliverable.

9.28 It is also apparent that each of these applications has already taken at least 1 year and 3 months to negotiate a S106 agreement and given that this remains to be negotiated there can be no confidence as to when and if these sites will achieve completions as set out by the Secretary of State in paragraph 18 of the Winsford decision.

9.29 The Council has also provided absolutely no evidence whatsoever, let alone clear evidence, that these sites will achieve completions within five years. Therefore, even if they did have outline planning permission at the base-date of the assessment they should still not be considered to be deliverable.

9.30 Nevertheless, contrary to the NPPF, the PPG, virtually every S78 Inspector and the Secretary of State and in the absence of any evidence whatsoever, the Council rely upon two of these sites delivering circa half a year's completions in 2020/21 within 6 months' time. As above, within this 6 month period it would be

necessary to conclude the S106 negotiations, undertake the technical work in support of the discharge of conditions, apply for and gain approval of the discharge of conditions, prepare, submitted and determine applications for the approval of reserved matters, undertake all pre-commencement works including the construction of the site access, sewerage, utilities connections, internal roads etc, fulfil the necessary planning obligations, commence development and achieve the first completion. I consider that the trajectory of the Council is simply unrealistic.

9.31 Given that these sites should not be considered deliverable even if there is clear evidence according to the NPPF, PPG, virtually every S78 Inspector and the Secretary of State, and given that there is no clear or realistic evidence in support of these sites, they should not be considered deliverable.

9.32 Land South West of Sovereign Crescent, Locks Heath; and Moraunt Drive, Portchester – the sites are again considered jointly as they have the same planning status. They both benefit from a resolution to grant full planning permission but do not benefit from planning permission. If the definition of a deliverable site is treated as a closed list in accordance with the PPG and the interpretation of virtually every decision-taker, then these sites should not be considered deliverable. However, even if the definition is not treated as a closed list, given the outstanding need for legal agreements which are necessary to demonstrate that the site can be suitably delivered, I do not consider these to be deliverable.

9.33 The full planning application for the construction of 38 homes at Land South West of Sovereign Crescent gained a resolution to grant planning permission in September 2018 subject to a S106 which is required to secure:

- The provision and transfer of the areas of open space, wildlife corridor and buffer zones to the Council including associated financial contributions for its future maintenance;
- Pedestrian and cycle access for members of the public through the site in perpetuity;
- A financial contribution towards the Solent Recreation Mitigation Partnership;

- 15 on-site affordable houses and a financial contribution towards the provision of off-site affordable housing;
- A financial contribution towards education provision.

9.34 The full planning application for the construction of 48 homes at Moraunt Drove gained a resolution to grant planning permission in December 2018 subject to a S106 which is required to secure:

- A financial contribution to secure satisfactory mitigation on the 'in combination' effects that the increase in residential units on the site would cause through increased recreational disturbance on the Solent Coastal SPAs;
- The provision and management of public open space and ecological enhancement area for the lifetime of the development;
- Education contribution;
- The delivery of affordable housing and contributions;
- The Council to be given advance notice of any clearance works to be undertaken at the site and the Council's officers/representatives given unfettered access to view all clearance related works;
- All clearance works to be overseen by Radian's appointed ecologists in accordance with a scheme first agreed in advance with the Council.

9.35 As above, it is once again evident that the suitability of these sites for the proposed developments is entirely dependent upon securing planning obligations which have not yet been secured. Accordingly, in the absence of these planning obligations, these sites do not offer a suitable location for development and should not be considered deliverable.

9.36 The Council has once again provided no evidence whatsoever, let alone clear evidence, to demonstrate that these sites which do not even benefit from planning permission will achieve completions within five years.

9.37 The respective positions on sites which are not included in Category A or B are set out in Table 9.1 below.

Table 9.1 – the deliverable supply from sites outside of the closed list

	Position of the Council	Position of the Appellant
Land at Brook Lane, Warsash	180	0
Land East of Brook Lane, Warsash	140	0
Land South of Greenaway Lane, Warsash	157	0
East & West of 79 Greenaway Lane, Warsash	30	0
Land South of Funtley Road, Funtley	55	0
Southampton Road (Reside)	105	0
Egmont Nurseries, Brook Avenue	8	0
Land South West of Sovereign Crescent, Locks Heath	38	0
Moraunt Drive, Portchester	48	0
Sites outside of the closed list	761	0

10. WINDFALL ALLOWANCE

10.1 I agree with the windfall allowance of 74 homes assumed by the Council as set out in Table 10.1 below.

Table 10.1 – the windfall allowance

	Position of the Council	Position of the Appellant
Windfall allowance	74	74

11. DELIVERABLE SUPPLY CONCLUSIONS

- 11.1 The preceding analysis demonstrates that not only have the Council's previous trajectories over-estimated the supply by a significant margin, but also that the Council misapply the definition of a deliverable site, assume unrealistic lead-in times, and do not provide any clear evidence in support of sites. Once the definition of a deliverable site is correctly applied, it is apparent that the deliverable supply is significantly lower than identified by the Council.
- 11.2 The respective positions on all components of the deliverable supply is summarised in Table 11.1 below.

Table 11.1 – respective positions on the deliverable supply

Source of supply	Position of the Council	Position of the Appellant
Category A: sites which should be considered deliverable unless there is clear evidence to the contrary		
Small permitted sites	156	156
Large permitted sites with detailed consent	469	454
1 Station Industrial Park	15	0
Other sites with detailed planning permission	454	454
Category B: sites which should only be considered deliverable where there is clear evidence that completions will begin on site within five years		
Large permitted sites with outline planning permission	112	27
Land east of Brook Lane, Warsash	85	0
Land north of Funtley Road, Funtley	27	27
Allocations	827	0
Heath Road, Locks Heath	70	0
Wynton Way, Fareham	18	0
335-337 Gosport Road, Fareham	12	0
Stubbington Lane, Hill Head	12	0
Sea Lane, Hill Head	8	0
Corner of Station Road, Portchester	17	0
Welborne	690	0
Sites identified on a Brownfield Register	145	0
Fareham Magistrates Court	45	0
Warsash Maritime Academy	100	0
Sites outside the closed list		
Sites subject to a resolution to grant planning permission	761	0
Land at Brook Lane, Warsash	180	0
Land East of Brook Lane, Warsash	140	0
Land South of Greenaway Lane, Warsash	157	0
East & West of 79 Greenaway Lane, Warsash	30	0
Land South of Funtley Road, Funtley	55	0
Southampton Road (Reside)	105	0
Egmont Nurseries, Brook Avenue	8	0
Land South West of Sovereign Crescent, Locks Heath	38	0
Moraunt Drive, Portchester	48	0
Windfall allowance		
Windfall allowance	74	74
Total	2,544	711

12. THE FIVE-YEAR LAND SUPPLY

12.1 The respective current five-year land supply positions of the Council and myself are calculated in Table 12.1 below.

Table 12.1 – the respective five-year housing land supply positions

		Position of the Council	Position of the Appellant
A (see Table 5.1)	Five-year requirement including 5% buffer 2019-24	2,730	2,743
B	Deliverable supply	2,544	711
C = B/A x 5	Five-year land supply	4.66	1.30
D = B-A	Shortfall/surplus	-186	-2,032

12.2 Based on the preceding analysis, I consider that Fareham Borough Council is currently able to demonstrate a deliverable supply of 711 homes against a five-year requirement for 2,743 homes. This equates to a **1.30 year land supply** with a shortfall of 2,032 homes.

12.3 However, as identified previously, depending upon the new approach to determining local housing need proposed in Planning for the Future, it is considered likely that the standard method will increase in the short-term such that the five-year land supply position will be lower than identified in Table 12.1.

12.4 As a result, not only is the 'tilted balance' of paragraph 11d of the NPPF engaged, the five-year land supply shortfall is significant.

13. THE FUTURE FIVE-YEAR LAND SUPPLY POSITION

13.1 As set out in paragraph 60 of the High Court Judgment of *Phides Estates (Overseas) Limited vs the Secretary of State for Communities and Local Government et al [2015] EWHC 827 (Admin)*, the extent of the shortfall may be material to the weight afforded to policies and housing supply, but so may the length of time this is likely to persist. I therefore analyse the available evidence to determine whether the five-year land position is likely to improve in the short-term.

Housing Requirement

13.2 Fareham Borough Council is in the process of preparing a review of their Local Plan. A supplement to the previous Regulation 18 consultation was consulted upon from January to March 2020 which indicated that this is intended that the Local Plan Review will be adopted in the summer of 2021.

13.3 The Local Plan Review proposes a housing requirement of between 10 and 15% above the standard method, in addition to any unmet needs, over the period 2020-36. Assuming that the Local Plan Review is adopted in the summer of 2021 as planned, the five-year land supply would then be monitored against this figure. Based on the currently proposed housing requirement the five-year land supply position would be significantly lower than currently identified by the Council and it would be necessary to significantly boost the supply through additional allocations in order to restore a five-year land supply.

13.4 The housing requirement currently proposed in the Local Plan Review will however be subject to at least annual changes as the standard method is reviewed annually, the proposed allocations will need to be reviewed accordingly and the Local Plan Review will need to be subject to at least an additional round of consultation/s. It is therefore not possible to accurately calculate the five-year land supply position thereafter given the potential for significant changes to both the housing requirement and the supply.

13.5 Until such time as the Local Plan Review is adopted, the five-year land supply position will continue to be monitored against the standard method. As identified previously, the current standard method produces a minimum annual local housing need for 523 homes per annum from 1st April 2019 in Fareham Borough.

- 13.6 The necessary information has recently been published to enable the current standard method to be calculated from 1st April 2020. This produces a minimum local housing need for 514 homes per annum from 1st April 2020. However, the necessary information is not yet available to calculate the five-year land supply position from 2021.
- 13.7 Therefore, regardless of whether or not the Local Plan Review is adopted in the summer of 2021 as planned, it is not possible to calculate the five-year land supply position from 2021 onwards. This analysis is therefore confined to the five-year land supply position in 2020.
- 13.8 As identified previously, whilst the current standard method produces a minimum local housing need for 523 or 514 homes per annum from 2019 and 2020 respectively, the Government has proposed to introduce a new approach to calculating the local housing need in the short-term and this will presumably replace the current standard method. Nevertheless, in the absence of any detail on what this new approach will consist of, the future five-year land supply is considered against the figure which would arise from the current standard method within this report. As it is considered that the new approach is likely to increase the minimum local housing need in Fareham, the actual five-year land supply position is likely to lower than that identified in this analysis.
- 13.9 Based on the minimum local housing need for 514 homes per annum from 1st April 2020 onwards which arises from the current standard method, there would be a base five-year requirement for 2,570 homes.

Buffer

- 13.10 The buffer is determined by the Housing Delivery Test. As identified previously, the current Housing Delivery Test results indicate that there is not a record of significant under-delivery in Fareham Borough such that it is appropriate to apply a 5% buffer.
- 13.11 However, the Housing Delivery Test results for the period 2017-2020 are due to be published in November 2020²² and this will determine the buffer to be applied from that date onwards²³. It is therefore necessary to estimate the likely Housing Delivery Test result which will arise in November 2020.

²² See the PPG (68-038)

²³ See the PPG (68-022)

- 13.12 Over the period 2017-2019, the Housing Delivery Test results 2019 identify that there were 581 completions. The Council's trajectory indicates that an additional 263 completions will be achieved in 2019/20 providing a total of 844 in the period 2017-2020.
- 13.13 Over the period 2017-2019, the Housing Delivery Test results 2019 identify that there was a need for 674 homes. As identified previously, from 1st April 2019 the standard method identifies that there is a minimum local housing need for 523 homes in 2019/20. This provides for a total need for 1,197 homes on the period 2017-2020.
- 13.14 Therefore, it is anticipated that the Housing Delivery Test results of 2020 will identify that only 71%²⁴ of the number of homes required will have been delivered such that Fareham Borough will have a record of substantial under-delivery such that the policies which are most important for determining applications will be automatically out-of-date regardless of the five-year land supply position according to Footnote 7 of the NPPF.
- 13.15 This would also amount to a record of significant under-delivery which requires then application of a 20% buffer from November 2020. Until these results are released, the current 5% buffer will continue to apply and the 'tilted balance' is not automatically engaged.

Five-Year Requirement

- 13.16 Based on the preceding analysis, over the period 1st April 2020 to 31st March 2025 there will be a five-year requirement for 2,699 homes²⁵ but from November 2020 this will increase to 3,084 homes²⁶.

Deliverable supply

- 13.17 In order to calculate the deliverable supply of the Council from 1st April 2020 it is necessary to take account of the housing which will remain to be delivered on the sites identified in the Council's trajectory as well as any other newly arising sites.
- 13.18 According to the Council's trajectory there will be 2,281 completions in the period 2020-2024. There is only one specific site contained in the Council's housing

²⁴ =844/1,197.

²⁵ Based on an annual need for 514 homes with an additional 5% buffer.

²⁶ Based on an annual need for 514 homes with an additional 20% buffer.

trajectory with any remaining capacity to deliver in 2024/25, namely Welborne, which the Council expect to deliver 240 homes, as well as the annual windfall allowance for an additional 37 homes. This would provide a deliverable supply of 2,558 homes based on the Council's trajectory.

13.19 However, it is also necessary to take into account any additional large sites which may have gained planning permission in 2019/20. Having reviewed the weekly lists of the Council, I have only been able to identify the equivalent of 25 homes on large sites²⁷ (of 5 or more homes) which have been granted planning permission²⁸ in the 2019/20.

13.20 It is immediately apparent that based on the additional supply of 62 homes²⁹ as compared to the minimum local housing need for 523 homes per annum in 2019/20, the Council is not taking action to address the five-year land supply shortfall.

13.21 Furthermore, the 761 homes which the Council include in their trajectory which have gained a resolution to grant planning permission have still not gained planning permission. Unless this changes by 31st March 2020, they will remain ineligible for inclusion in the deliverable supply.

13.22 In total, based on the supply of 2,281 homes assumed by the Council in the period 2020-24, another 240 completions from Welborne in 2024/25, another years small site windfall allowance of 37 homes, the additional 25 homes which have been granted planning permission on large sites and the continued absence of planning permission for 761 homes, the Council will be able to demonstrate a deliverable supply of 1,822 homes even if:

- the unrealistic trajectories of the Council come to fruition; and
- the Council produces clear evidence in support of all of the Category B sites.

²⁷ Comprising 8 homes under P/19/0321/PC, 7 homes under P/19/0654/OC, 5 homes under P/19/1275/PC; and 9 bedspaces under P/19/1348/FP which will release 5 homes to the market using the Census data specified in the PPG (63-016a).

²⁸ Excluding those which already benefited from outline planning permission, but which have since gained approval of reserved matters as these are already included in the supply of the Council.

²⁹ Calculated from the additional years small-site windfall allowance of 37 homes and the 25 homes which have gained planning permission on large sites.

13.23 This would equate to a 3.38 year land supply until November 2020, following which it would equate to a 2.95 year land supply. This compares to 3.25 year land supply which would currently arise from 1st April 2019 once the 761 homes on sites outside of the closed list are excluded³⁰. However, as set out throughout this report, it is considered that the five-year land supply position will actually be materially lower once realistic trajectories are assumed based on clear evidence. This position is also considered likely to be materially lower once the local housing need is reviewed as proposed in the spring of 2020.

13.24 It is therefore evident that not only is it likely that there will be a record of substantial under-delivery which engages the 'tilted balance' automatically but also that the Council will remain unable to demonstrate a five-year land supply for the forthcoming year at least and that it is likely that there will remain a significant shortfall.

³⁰ = $(2,544 - 761) / 2,743 \times 5$.

14. CONCLUSIONS

14.1 The preceding analysis demonstrates that:

- i. The affordability of housing in Fareham is significantly worse than the Government indicate as being 'acceptable';
- ii. There has been a significant under-delivery of affordable housing, totalling an under-supply of 1,806 affordable homes over the past 8 years;
- iii. The Council is unable to demonstrate a five-year land supply such that the 'tilted balance' of paragraph 11d is engaged;
- iv. The Council's assessment of the five-year land supply significantly over-estimates the five-year land supply position including because:
 - The minimum local housing need is slightly greater than identified by the Council as a result of the new affordability information which has been published;
 - The deliverable supply of the Council has been found to be significantly over-estimated by every S78 appeal Inspector to have considered this matter;
 - The Council includes a site in the deliverable supply which is not available now according to the interpretation of the courts;
 - The Council includes planning applications which cannot be demonstrated to be suitable now including owing to the likely significant effects on Natura 2000 sites and the absence of any evidence that these can be appropriately mitigated;
 - The Council has provided no evidence, let alone clear evidence, in support of the overwhelming majority of sites within Category B (or outside of Category A and B) of the definition of a deliverable site, such that these should not be considered to be deliverable;
 - The Council relies upon unrealistic lead-in times on numerous sites;

- The Council relies upon a number of sites delivering a number of homes which has not been tested or found to be deliverable;
 - The Council relies upon out-of-date trajectories which can no longer be achieved having been superseded by events;
 - The Council assume that sites can be considered to be suitable now without these having been subject to any consultation including with statutory consultees or members of the public to determine the suitability or otherwise of these sites; and
 - The Council include a significant number of sites outside of the closed list which do not accord with the NPPF, the PPG, the findings of all but one S78 Inspector, and the findings of the Secretary of State.
- v. The Council is likely to have a record of substantial under-delivery in the near future which will automatically engage the 'tilted balance';
- vi. The five-year land supply shortfall will persist at least for the short-term.

APPENDIX 5

EMAIL FROM PLANNING OFFICER DATED 24/03/2020

Jane Gardiner

From: Chambers, Jean <JChambers@Fareham.Gov.UK>
Sent: 24 March 2020 13:41
To: Kate Holden
Subject: RE: Land at Newgate Lane, Fareham P/18/1118/OA and P/19/0460/OA

Follow Up Flag: Follow up
Flag Status: Completed

Kate

Thanks for the email. Yes I am moving on to a new position. At this time, I am unable to access the case file but your summary below seems reasonable apart from:

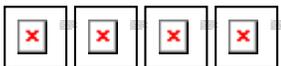
- I do not agree that it would be appropriate to use a condition relating to the chamomile if minded to grant
- the nitrates calculation in the scenario that we were to undertake an HRA would need to take account of the latest Natural England advice.

I appreciate that you are aware of the Council's concern relating to this application from our previous correspondence and can confirm that I have prepared a handover note for the new case officer. My email is without prejudice to a more detailed review of the file once access to it can be secured. In the meantime, if this is not confirmed prior to Thursday (my last day with Fareham) I suggest you contact Lee Smith – lsmith@fareham.gov.uk who I have copied into this email for future reference as he will be re-allocating the case.

Best wishes for the future

Jean

Jean Chambers
Principal Planner (Development Management)
Fareham Borough Council
01329824355



From: Kate Holden <Kate.Holden@pegasusgroup.co.uk>
Sent: 17 March 2020 15:05
To: Chambers, Jean <JChambers@Fareham.Gov.UK>
Subject: Land at Newgate Lane, Fareham

Hi Jean,

I hope you are well and surviving the madness.

I heard via Paul Thomas that you are unfortunately leaving the Council. I would be most grateful if we could seek to confirm a brief summary of where we are with the application so that when passed on to another officer, we will not need to go over old ground.

From my understanding, the position is as per below:

- Principle of development/design/landscape – you have expressed your concerns which are noted. We are preparing some additional landscape work which should be with you before the end of the month and which I hope may facilitate further discussion on this.
- Highways – you will take a view based on advice from HCC. We are meeting with HCC next week to discuss the latest documents and modelling.
- Ecology – there is an outstanding query in relation to the presence of chamomile and whether this can be dealt with by condition but all other matters (inc. mitigation payments) are agreed
- Nitrates – we have provided all the necessary evidence to support nitrate neutrality - Agreed
- Flood Risk – EA objection now removed - Agreed
- Heritage – Agreed
- Arboriculture – Agreed
- Air Quality - Agreed
- Noise - Agreed
- Odour - Agreed
- Minerals - Agreed

I would be pleased if you could confirm the above or otherwise set out your comments. I would like to be able to ensure that we are only dealing with resolving the first two items once this is passed over.

Regards,

Kate.

Kate Holden

Associate Planner

Pegasus Group

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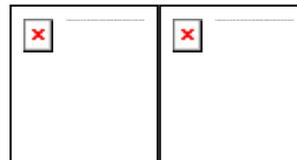
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APPENDIX 6

**MR KEVIN MAJOR-MORELL AGAINST THE DECISION OF REIGATE AND
BANSTEAD BOROUGH COUNCIL**

Appeal Decision

Site visit made on 18 July 2017

by Anthony J Wharton BArch RIBA RIAS MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 25 July 2017

Appeal Ref: APP/L3625/X/16/3165616
Whistlers, 3 Can Hatch, Burgh Heath, Surrey KT206DS

- The appeal is made under section 195 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991 against a refusal to grant a certificate of lawful use or development (LDC).
 - The appeal is made by Mr Kevin Major-Morell against the decision of Reigate and Banstead Borough Council (the LPA).
 - The application Ref 16/02410/CLP dated 14 October 2016 was refused by notice dated 9 December 2016.
 - The application was made under section 192 (1) (b) of the Town and Country Planning Act 1990 as amended. (note: this application is made on the basis that a proposed development is lawful for planning purposes).
 - The proposed development for which a certificate of lawful use or development is sought is worded as follows: remove entrance gates and reduce height of existing piers to less than 1m high. Rebuild piers and rehang entrance gates further into the site i.e. not adjacent to the highway.
-

Decision

1. The appeal is dismissed.

Introduction and background information

2. 'Whistlers' (No 3) is the last of three, 20thC, substantial detached dwelling houses located on the west side, at the northern end, of the short cul-de-sac known as Can Hatch. The appeal site is around 50m north of the junction with Canons Lane. All of the dwellings are set within extensive grounds and, to the east and north, there are agricultural fields, yards and open countryside. The properties lie within the Metropolitan Green Belt (MGB) and are also located within an area of great landscape value (AGLV).

3. Several years ago (stated to be 'in or around 2011'), the appellant started to construct two sets of entrance gates to the site; one to the southern end and the other at the northern end. The southern set of gates incorporated a pair of vehicular gates and a pedestrian gate and the northern ones just a pair of vehicular gates. Both gate installations were 2m in height and were located immediately abutting the boundary with the highway (Can Hatch).

4. The works were not completed and, therefore, could not benefit from being considered lawful under the '4 year rule'. Neither could they benefit from permitted development rights (being over 1m in height and abutting the highway), under the relevant section of the Town and Country Planning (General Permitted Development) Order 2015 (GPDO). The remainder of the boundary appears to consist of a post and wire fence, 1m in height and I noted this during my site visit. I also noted various vehicles (including vans) parked on the footway and the highway which blocked access to the turning circle at the end of Can Hatch.

5. Following a visit from a LPA Enforcement Officer in July 2016 the appellant was advised (by his agent) to reposition the gates and piers so that they were not immediately adjacent to, or abutting the highway. It was considered that in doing so they would benefit from permitted development rights under the relevant section of the GPDO. The LDC application (the decision of which is now the subject of this appeal) was made in October 2016 but the LPA enforcement officer was still of the view that the proposal was not considered to be permitted development.

6. The LDC application drawing indicates that the two sets of main gates are proposed to be set back 1m from the inner face of the piers as built. The outer piers abutting the highway are proposed to be reduced in height to 1m and a 900mm high wall is proposed to be built between the reduced height outer piers and the 2m high inner piers. It is stressed that the 900mm high wall would not be attached to the 2m high piers and, therefore, that the enclosure would not be a continuous wall, gate or fence enclosure to the boundary of the property.

The representations

7. There are representations in the form of initial '*Grounds of Appeal*' and statements/final comments on behalf of the appellant and a statement/officer report made by the Council. As well as setting out their respective cases, these submissions refer to previous Appeal decisions (including one on Reigate Road) relating to the same subject: that is, what does or does not constitute an enclosure, wall, and fence or gates that is considered to be '*adjacent*'; to a highway. These also include one of my decisions.

8. However, none of these other appeals, including my own, have had any influence on my decision in this case. Each appeal must be considered its merits and none of the other situations was identical to the physical layout of these gates, posts and walls regarding their positioning and relationship to the highway. I have dealt with this case on its merits and in an open, fair and impartial manner. In reaching my decision I have taken into account all of the material considerations relating to the LDC application; all of the written submissions and what I saw during the course of my site visit.

Reasons

9. An appeal relating to a Certificate of Lawful Use or development (LDC) is confined to the narrow remit of reviewing the Local Planning Authority's (LPA) reason for refusal and then deciding whether the reasons are well founded. The planning merits of the case do not fall to be considered.

10. The erection of a gate, fence, wall, or other enclosure can be permitted development under Article 3, Schedule 2, Part 2, Class A of the Town and Country Planning (General Permitted Development) Order 2015 (GPDO). However, the erection of a gate, fence, wall, or other enclosure over 1m in height, which is '*adjacent*' to a highway used by vehicular traffic, is not permitted development and planning permission is required for such a proposal.

11. The question in this case, therefore, revolves around whether or not the proposed, set-back, re-positioned and rebuilt piers and gates (at 2m in height) would be '*adjacent*', or not, to the highway, Can Hatch. Clearly, the lower piers (1m in height) and the wall (also 1m in height) would be immediately next to the footway and there is no dispute that these would be '*adjacent*' to the highway. Due to their reduced height not exceeding 1m, they would constitute permitted development under Article 3, Schedule 2, Part 2, Class A of the GPDO.

12. The word '*adjacent*' is not defined in the Planning Act and the courts have held that legislators were not likely to have intended '*a one size fits all approach*'. The common dictionary definition of '*adjacent*' is '*lying near to*' or '*contiguous*', although Case Law also clarifies that that '*adjacency*' does not equate to something being '*contiguous*' or '*abutting*'.

13. Thus the position established by the courts is that the word '*adjacent*' does not necessarily mean that the fence has to be abutting or touching the highway. In the case of *Simmonds v SSE and Rochdale MDC [1981]* it was held that a fence higher than one metre and less than one metre from a footway to a highway did abut the highway. In another case a 2m distance (between highway and enclosure) also resulted in a conclusion that the structures were '*adjacent*' to the highway.

14. Thus, the thrust of case law and other appeal decisions is that a wall or fence or a pier and gates can be set back from a highway, but still be '*adjacent*' to it, as a matter of fact and degree, provided that the enclosure is clearly to define the boundary of the property concerned from the highway and is perceived to do so. As indicated above each situation has to be considered on its merits and a planning judgement needs to be made in each case.

15. Having seen the appeal site and the proposed drawing (1:500/100@ A3, October 2016 216/11/02) I note that both north and south gates would be set back and would not be joined to the lower piers and walls. However, it is clearly intended that the lower piers and walls and the re-positioned higher piers and gates would be a major element in the means of enclosure to the appellant's land.

16. Having seen the existing and proposed new location of the 2m high, re-positioned piers and gates in relation to the highway, it is my view that they would, as a matter of fact and degree, still be clearly perceived as being '*adjacent*' to the highway at Can Hatch. Due to their size and form they are dominant and distinctly noticeable features along the side of this part of the cul-de-sac. This perception of proximity to the highway is reinforced by the fact that the other two dwellings to the south have no such gate piers, gates or other enclosures.

17. The presence of vehicles parked on the footway and the road also emphasised the proximity of the existing gates and piers and gates to the highway. In my view a simple setting back of these features by just 1m would make no discernible difference as to how the re-positioned piers and gates would be perceived when viewed from the highway. On the basis of what is now proposed, therefore, I consider that the proposed piers and gates would still be '*adjacent*' to the highway and, because they would exceed 1m in height would not constitute permitted development under the GPDO.

18. I acknowledge that the proposed 2m high gates and piers would not be attached to the lower piers and walls and that they would be set back at least 1m from the back of the footway (the highway). However, each case must be assessed on its merits and, as a matter of fact and degree, I consider that the piers and gates in these positions and of this height would still be perceived as being part of the main boundary between the highway and the appellant's property. I conclude, therefore, that the wall and gates (exceeding 1m in height) as proposed would not be lawful within the meaning of Article 3, Schedule 2, Part 2, Class A of the GPDO. I consider that the LPA decision was sound and that planning permission would be required for the proposal. The appeal, therefore fails and a LDC will not be issued.

Other Matters

19. I have taken into account all of the other matters raised on behalf of the appellant and by the Council. These include the detailed grounds of appeal; the submitted statements and the officer report. They also include the appellant's detailed comments in relation to the difference between this case and the appeal on the Reigate Road.

20. In particular it is contended that in this case, because there are physical structures between the highway and the proposal (and that these are not connected), the newly positioned gates and piers cannot be construed as an integral part of the boundary treatment. However I disagree and consider that this part of the boundary treatment has simply been moved further away from the highway. For the reasons set out above I have concluded that the proposal would still be '*adjacent*' to this part of the highway at Can Hatch.

21. None of the other matters alters my conclusions and nor is any other factor of such significance so as to change my decision that the proposal would not have been lawful for planning purposes on the date of the LDC application.

Anthony J Wharton

Inspector

APPENDIX 7
SUPPORTING LANDSCAPE STATEMENT

APPEAL BY FAREHAM LAND LP AND BARGATE HOMES LTD

**LAND AT NEWGATE LANE (NORTH) AND LAND AT
NEWGATE LANE (SOUTH), FAREHAM, HAMPSHIRE**

**STATEMENT OF CASE:
SUPPORTING STATEMENT ON LANDSCAPE AND
VISUAL MATTERS**

PREPARED BY:

JAMES W. ATKIN
BSC (Hons) DIP LM CMLI



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1. INTRODUCTION

Qualifications and Experience

- 1.1. My name is James Atkin. I hold the position of Director (Landscape) in the Birmingham Office of the Pegasus Group. The Company undertakes all aspects of planning, urban and landscape design and environmental planning. I have a Bachelor of Science Degree in Landscape Design and Plant Science and a Diploma in Landscape Management, both from the University of Sheffield. I am also a Chartered Member of the Landscape Institute (2005).
- 1.2. I have over 19 years professional experience specialising in the application of landscape and visual assessment. I have authored landscape and visual impact appraisals, assessments and evidence, both in the UK and in the international context. These have been completed in accordance with best practice guidance applicable across a variety of sectors, including GLVIA (Landscape Institute), IAN 135/10 (DMRB, Highways Agency) and WebTAG (Department for Transport).
- 1.3. Prior to joining the Pegasus Group I have worked for multidisciplinary consultancies including Wardell Armstrong LLP and Atkins, advising on landscape and visual matters across a range of sectors including power, highways, rail, housing, waste, land reclamation and restoration, mineral extraction, commercial developments and renewable energy.
- 1.4. Since joining the Pegasus Group I have completed a number of detailed LVIA's for residential and mixed use development schemes on sites across the UK and have produced technical documents on landscape and visual matters for use in planning applications and at appeal.
- 1.5. I am currently involved in a variety of projects for mixed use and residential masterplans, of varying scales between 10 and 1000 units, in both urban and urban fringe environments, where matters of sensitive and designated landscapes are key considerations. The diversity of these different project types has enabled me to develop a strong understanding as to how different landscapes can respond to different types of development.

Terms of Reference

- 1.6. This statement is written on behalf of and Fareham Land LP and Bargate Homes Ltd (the appellants) and relates to an appeal for non-determination by Fareham Borough Council in respect of two outline applications for residential development, both on land to the east of Newgate Lane.
- 1.7. This statement has been prepared in support of the main Statement of Case submitted with the appeal and sets out an overview of relevant landscape and visual matters.
- 1.8. The outline application for 'Land at Newgate Lane (North) (Fareham Land LP; LPA ref. P/18/1118/OA) sought permission for:
 - The Demolition of Existing Buildings and Development Of Up To 75 Dwellings, Open Space, Vehicular Access Point From Newgate Lane And Associated And Ancillary Infrastructure, With All Matters Except Access To Be Reserved.
- 1.9. The outline application for 'Land at Newgate Lane (South) (Bargate Homes Limited; LPA ref. P/19/0460/OA) sought permission for:
 - Demolition of Existing Buildings and Development Of Up To 115 Dwellings, Open Space, Vehicular Access Point From Newgate Lane And Associated And Ancillary Infrastructure, With All Matters Except Access To Be Reserved.
- 1.10. These are referred to as the 'northern' site and the 'southern' site respectively. Whilst the two sites are subject of separate applications, it is important to note that the proposals have always been conceived as a cohesive development, together addressing the constraints and opportunities in respect of the local landscape context and providing a cohesive and complementary strategy for development and mitigation.
- 1.11. The evidence provided in this statement applies to both appeals, unless specifically stated otherwise.
- 1.12. Each application was supported by a Landscape and Visual Impact Assessment (LVIA), prepared by Pegasus Group on behalf of the appellants. Reference is made to the content and findings of these where relevant, supplemented by additional professional judgement as necessary.
- 1.13. Principles and good practice for undertaking landscape and visual impact assessment (LVIA) and/or applying the principles of LVIA are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and

Visual Impact Assessment, Third Edition (2013)¹ (GLVIA3). The concepts and procedures set out in this guidance have been adopted where appropriate.

- 1.14. The professional judgements which are presented in this supporting statement for this appeal (reference LPA reference P/18/1118/OA and P/19/0460/OA) have been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

¹ Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment 3rd Edition (April, 2013)

2. THE APPEAL SITES

2.1. This section sets out an overview of the appeal site and its context.

Site Overview

- 2.2. Together, the appeal sites extend to ca. 10 hectares (ha) of agricultural land, situated close to the urban edge of Fareham and within a discreet parcel of land that is bounded by Newgate Lane to the west, Woodcote Lane to the south and Newgate Lane East to the east (with Newgate Lane and Newgate Lane East framing the northern edge of the sites also).
- 2.3. Hambrook Lodge (accessed from the west, off Newgate Lane) Lodge and its curtilage is located between the two sites, but the property (and its access) is not included in the red line boundary for the sites.
- 2.4. The appeal sites are located outside the defined settlement boundary identified in the Local Plan policies map, in a 'Strategic Gap' known as the Fareham/Gosport to Stubbington/Lee on Solent Gap (or simply the Fareham - Stubbington Gap).
- 2.5. They are not subject to specific statutory or non-statutory landscape related planning designations.

Site Description and Context

- 2.6. The sites are located between Fareham and Gosport, adjacent to the suburbs of Woodcot and Peel Common. Hambrook Lodge is an isolated farmstead that is located to the south of the southern boundary of the northern site.
- 2.7. The northern site comprises three agricultural enclosures, the largest of which is currently in arable production, the smaller two are in pastoral use and include an area that surrounds the northern extent of Hambrook Lodge which itself includes a number of dilapidated buildings enclosed by mature vegetation.
- 2.8. Newgate Lane is located immediately to the west of the sites and, notwithstanding the new link road in the area, still forms a connection between the southern edge of Fareham and Gosport Road, further to the south. Immediately to the east is the route of the new relief road, Newgate Lane East.

- 2.9. The southern site comprises four mixed use agricultural enclosures, the fields to the east are currently in arable production, whilst the field to the west of the small watercourse that bisects the site, is being used as pastoral and equestrian paddocks.
- 2.10. The wider landscape is set within the low-lying ground of the coastal plain landscapes and characterised by abrupt transitions between the open landscapes of the coastal plain and the urban environments which abut these. These urban areas include the aforementioned Fareham, Gosport and Woodcote, with the settlement of Stubbington, a medium scale, predominantly residential settlement forming the western extent of the Stubbington strategic gap. The Stubbington strategic gap is an area of open landscape that extends across the coastal plain between these local settlement areas.

Recent Landscape Change

- 2.11. The LVIA reports submitted in support of the planning applications were prepared and finalised in late 2018 and include reference to the published landscape character study for the Borough (The Fareham Landscape Assessment, 2017). This was prepared by LUC on behalf of Fareham Borough Council (FBC) and forms part of the evidence base to the current Local Plan.
- 2.12. The appeal sites are located in an area defined by the LUC study as 'LCA 8, Woodcot-Alver Valley' (including sub areas 08.1a and 08.2b). In relation to 'LCA 8, Woodcot-Alver Valley', the LUC study acknowledges the emerging proposals of the Fareham bypass (Newgate Lane East) and potential strategic housing development on the edge of Woodcot/Bridgemary (parcel HA2) and the landscape change that these may bring.
- 2.13. Since the publication of the LUC study (and submission of the Pegasus Group LVIA work) the proposals for Newgate Lane East have been constructed and the route has been open to traffic since April 2018; the majority of landscape works were completed in the 2018/19 season.
- 2.14. Consequently, the provisional judgements made in the LUC study and the assessment of impacts undertaken in the submitted Pegasus Group LVIA, will need to be refreshed to consider the actual, current baseline situation. That includes the major highways infrastructure that now passes through the landscape as well as the still emerging policy proposals for extensive housing allocation at the edge of Woodcot/Bridgemary.

3. LANDSCAPE AND VISUAL ISSUES

3.1. The following section sets out an overview of the background to landscape and visual matters in respect of the appeal sites.

Submitted LVIAs

3.2. In respect of both appeal sites, landscape and visual matters formed part of an iterative design process that guided the development of the masterplans and integration of mitigation measures into the schemes.

3.3. For both sites, the submitted LVIA work demonstrated a limited effect on landscape character, restricted to a local level.

3.4. The work also demonstrated that the proposed developments would not detract from the function of the wider strategic gap due to the inherent character of the landscape itself, but also due to the physical and visual separation that is present between the sites and the more obvious and open part of the strategic gap between the sewage works (and Peel Common generally) and the eastern edge of Stubbington.

3.5. For views and visual amenity, the submitted LVIA work also demonstrated that the sites (and proposed developments) would be generally screened by the influence of landform, existing development and existing mature vegetation. Prominent views of the sites would only be available from its immediate context along Newgate Lane and Woodcote Lane with the greatest degree of visual effect from locations immediately adjacent to the sites, and from a small number of existing individual residential properties. Together, these are were not considered significant in landscape and visual terms.

3.6. Further design changes have occurred through the process of the application, overall maintaining or improving the proposed mitigation.

Further Landscape and Visual Evidence

3.7. Since the submission of the planning applications, the LPA has continued with the development and review of the Local Plan. Notwithstanding the continued adoption of 'Strategic Gap' policies in this part of the Borough the emerging proposals also identify a 'Strategic Growth Area' situated across the landscape between Stubbington and Fareham, overlapping with a large part of the retained Strategic Gap.

3.8. Although the Strategic Gap area extends east up to the settlement edge of Bridgemary, including housing allocations and the recently constructed Fareham bypass (New

Newgate Lane), the Strategic Growth Area has been drawn to an eastern limit up to the existing sewage works and solar farm that are present to the south-west of the edge of Fareham and consequently excludes the two appeal sites.

- 3.9. Although the Fareham Landscape Assessment (LUC, 2017) forms part of the evidence base for the policy proposals, there is no further specific study that addresses the necessary balance between the gap and strategic growth.
- 3.10. In order to address this issue, Pegasus Group undertook a strategic level study of the Fareham-Stubbington Strategic Gap (included at **Appendix A**), including the area up to the Gosport boundary. The aim of that study was to identify the core areas of Strategic Gap which were considered more fundamental to the function of the Strategic Gap in terms of preventing coalescence between settlements and maintaining of settlement identities. The study identified 'Priority Areas' that should be maintained as Strategic Gap, with areas outside of these considered further for growth.
- 3.11. The study concluded that areas on the northern and western edges of Stubbington and at Fareham (along Longfield Avenue and between Peel Common and Woodcot/Bridgemary) can accommodate growth and that development in these areas would not fundamentally undermine the physical separation, nor the sense of separation between Stubbington and Fareham.

LPA Response

- 3.12. The response on landscape and visual matters from FBC to the application for the northern site were provided by the Urban Design officer for the Council. These broadly suggested that the proposed development would have an 'unacceptable negative impact upon the integrity of the existing open, predominantly rural agricultural character', of the landscape
- 3.13. However, it was felt that the conclusions did not sufficiently consider the (then) emerging baseline of Newgate Lane East and potential strategic development site (HA2), consequently the response overemphasised the degree of impact arising from the scheme.
- 3.14. In this context Pegasus Group prepared a comprehensive response to address the points raised.

4. SUMMARY AND CONCLUSION

- 4.1. This supporting statement is written on behalf of and Fareham Land LP and Bargate Homes Ltd (the appellants) and relates to an appeal for non-determination by Fareham Borough Council in respect of two outline applications for residential development, both on land to the east of Newgate Lane.
- 4.2. This statement has been prepared in respect of landscape and visual matters and supports the main Statement of Case submitted with the appeal.
- 4.3. In the context of the 'appeal for non-determination', at the time of writing, any detailed position of the LPA in respect of landscape and visual matters is limited to the consultation response from the Urban Design officer, responding to the northern site. No additional formal responses have been received on landscape and visual matters and at this stage there is no officers report. Whilst refusal of the applications is not confirmed, neither are there any prospective reasons for refusal that might further inform evidence on landscape and visual matters.
- 4.4. Both applications were submitted with a detailed Landscape and Visual Impact Assessment. These not only set out a comprehensive baseline and robust assessment of predicted impacts, but include details as to how landscape and visual matters have influenced the design of the masterplan, with mitigation measures consequently forming an inherent part of the proposals, both independently but also in respect of the complementary approach of the two schemes.
- 4.5. Overall, it is considered that the more detailed analysis set out in the submitted LVIA addresses many of the issues raised by the Urban Design officer, giving clear analysis and justification for the professional judgements therein.
- 4.6. Consequently, the conclusions of the submitted LVIA are considered to be robust and, notwithstanding some limited impacts in respect of the site and its immediate context (as is typical of any greenfield development), the impacts on the local landscape character and visual receptors will be limited and the proposed development is considered to be acceptable in landscape and visual terms.
- 4.7. In addition to landscape character and views/visual amenity, the LVIA work also demonstrates how the sites, which are located toward the eastern extent of the Strategic Gap (assuming the proposed HA2 allocation comes forward) would be well related to the Bridgemary/Peel Common areas and continue to retain a substantial degree of physical and visual separation with Stubbington.

- 4.8. Further work in respect of the Strategic Gap demonstrates that there is scope for Strategic Growth to come forward, and that the site can form part of this, but that the Strategic Gap can be maintained.
- 4.9. Overall, in the context of these limited issues, and with the appeal schemes in place, landscape and visual issues are not sufficient to support a prospective reason for refusal.

APPENDICES

APPENDIX A

STRATEGIC LANDSCAPE AND VISUAL APPRAISAL OF THE STUBBINGTON TO FAREHAM STRATEGIC GAP, PEGASUS GROUP (MARCH 2020)

LANDSCAPE AND VISUAL APPRAISAL OF THE STUBBINGTON TO FAREHAM STRATEGIC GAP

STRATEGIC LANDSCAPE AND VISUAL APPRAISAL

FAREHAM, HAMPSHIRE

ON BEHALF OF BARGATE HOMES LTD AND FAREHAM LAND LP

Prepared by: Pegasus Group



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN ENVIRONMENT PLANNING ECONOMICS HERITAGE

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- FIGURE 2: Relevant Policies and Designations**
- FIGURE 3: Emerging and Potential Strategic Development**
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- APPENDIX A: Strategic Appraisal of Study Parcels**
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1.0 Introduction

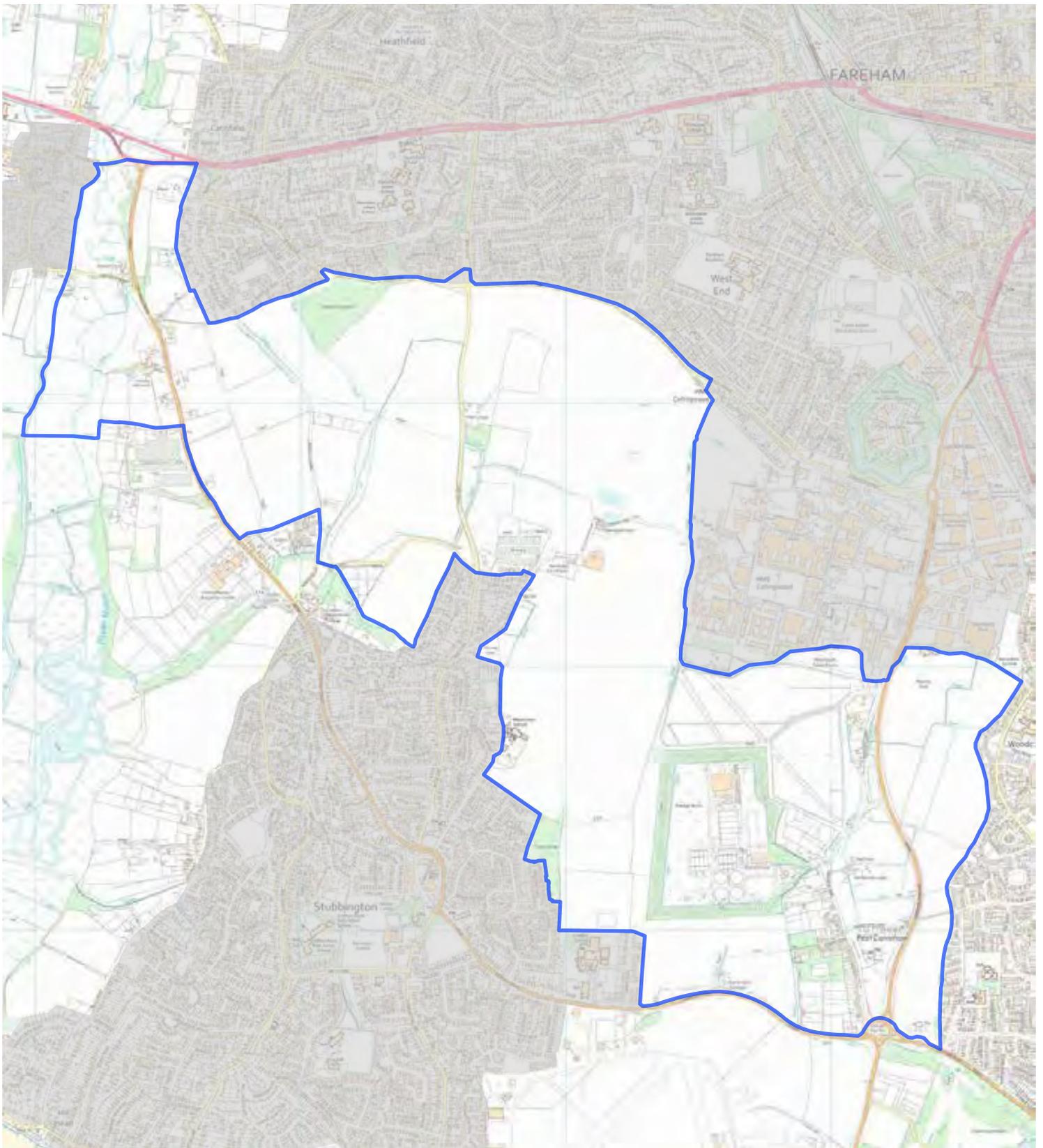
Terms of Reference

- 1.1 Pegasus Group have been instructed jointly by Bargate Homes Ltd and Fareham Land LP to undertake a strategic landscape and visual appraisal of the Stubbington and Fareham 'strategic gap'.
- 1.2 This strategic landscape and visual appraisal (SLVA) has been undertaken to determine the various landscape and visual constraints and opportunities regarding the landscape area between Fareham, Stubbington and Gosport (at Woodcot and Bridgemary) (refer to **Figure 1**).
- 1.3 The study has been applied at a strategic, landscape character scale, and as such does not consider the merits or otherwise of specific development proposals or sites, rather it intends to broadly consider the appropriateness and constraints in relation to potential development within the landscape (considering both residential and/or commercial) and the main areas anticipated for the longer term function of a strategic gap.
- 1.4 Additional information on the physical components, landscape character and visual amenity of the broad study area are set out in later sections of this SLVA.

Background and Purpose

Adopted Local Plan

- 1.5 The Fareham Borough Local Plan consists of three parts and sets out the Planning Strategy for the Borough up to 2026, including Part 1 (the Core Strategy), Part 2 (Development Sites and Policies), and Part 3 (The Welborne Plan).



LEGEND

-  Study area
-  Urban areas

SLVA: Fareham to Stubbington Strategic Gap
Fig. 1: Context of the Fareham to Stubbington Strategic Gap

Drawing Ref: BRS.4989_73
 Client: Bargate Homes Ltd and Fareham Land LP
 Date : 20/03/2020
 Drawn by : CW
 Checked by : JWA
 Scale : 1:20000 @ A4



1.6 The Strategic Gap is defined in the local plan under 'Policy CS22 Development in Strategic Gaps'. The Policy justification states that:

"Gaps between settlements particularly between Fareham and the Western Wards and Fareham and Stubbington, help define and maintain the separate identity of individual settlements and have strong local support. Strategic gaps do not have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. Continuing pressure for high levels of development mean that maintaining gaps continues to be justified.

Maintaining separation between Fareham and Titchfield Common/Segensworth and Fareham and Stubbington will prevent coalescence of the settlements in this densely settled part of South Hampshire. The countryside separating the settlements is narrow in places and under pressure for development, but it provides opportunities for additional public access. A review of the detailed boundaries will be undertaken as part of the Site Allocations and Development Management DPD to identify the land essential to perform this role and that which cannot be protected by other designations."

1.7 The Policy itself states that:

"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.

Strategic Gaps have been identified between Fareham/Stubbington and Western Wards/Whiteley (the Meon gap); and Stubbington/Lee on the Solent and Fareham/Gosport.

Their boundaries will be reviewed in accordance with the following criteria:

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

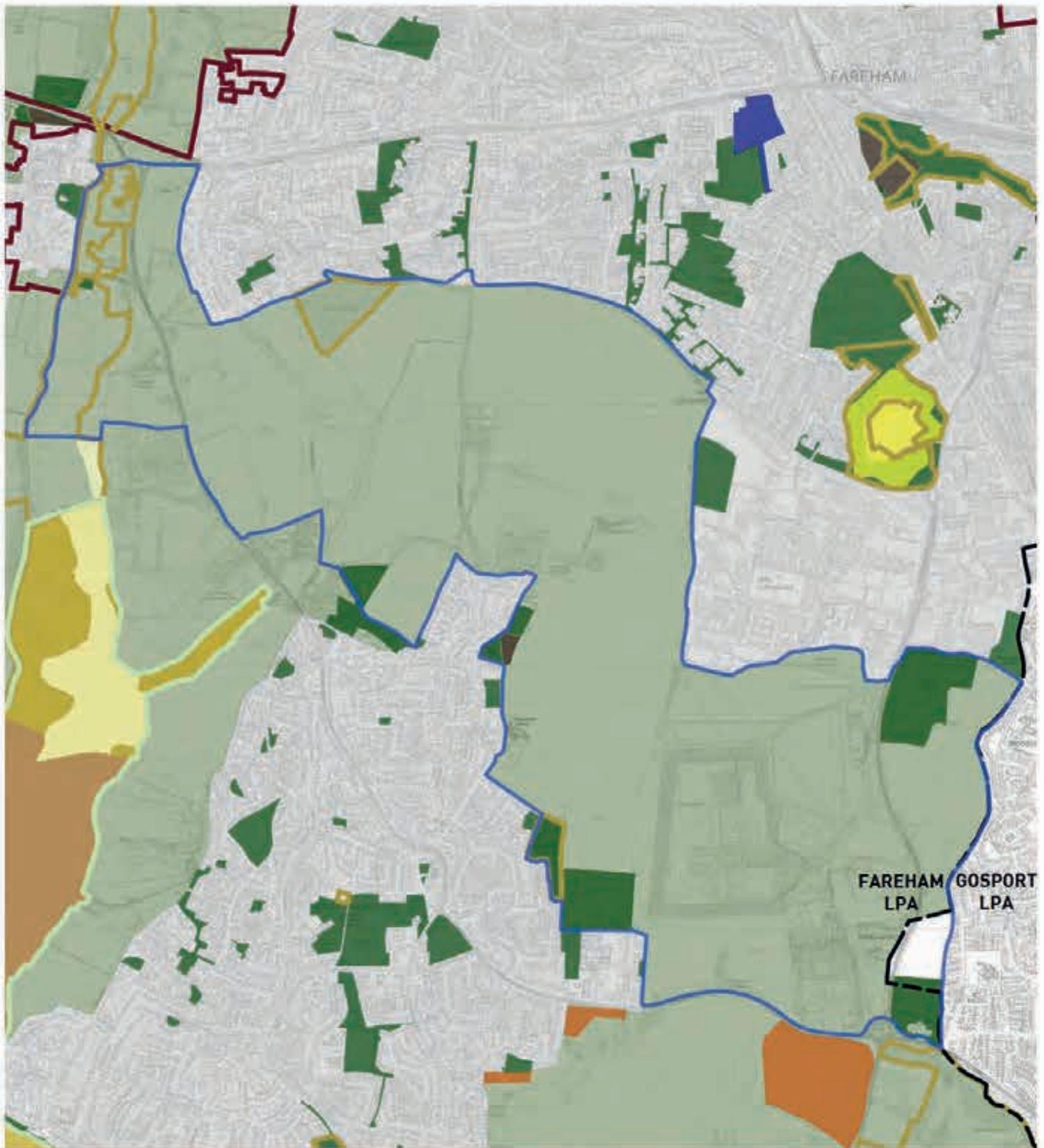
coalescence;

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.*"

Plate 1: Extract from Fareham Borough Local Plan Policies Map



- 1.8 For the context of this SLVA, the Policy reference to the 'Fareham to Stubbington' gap is relevant, including the area of landscape between Titchfield, Fareham, Stubbington, Woodcot and Bridgemyary. The policy also refers to strategic gaps between Western Wards to Whiteley (the Meon gap), Stubbington to Lee on the Solent, and Fareham to Gosport. These separate gaps are not included in the scope of this SLVA.



LEGEND

- | | | |
|---|--|---|
| Study area | Strategic Gap (CS22)* | Sites of Importance for Nature Conservation (CS4, DSP13)* |
| Defined Urban Settlement Boundaries (CS6, CS14, DSP6-10)* | SPA/SAC/RAMSAR Sites (CS4, DSP13, DSP15)* | Allotments (CS21)* |
| Conservation Areas (CS6, DSP5)* | Sites of Special Scientific Interest (CS4, DSP13)* | Existing Open Space (CS21)* |
| Historic Parks and Gardens (DSP5)* | National Nature Reserves (CS4, DSP13)* | Public Open Space Allocations (CS10, CS21, DSP12)* |
| Scheduled Ancient Monuments (CS6, DSP5)* | Local Nature Reserves (CS4, DSP13)* | |

Source:
 * Fareham Borough Local Plan Part 2 (adopted 2015)

SLVA: Fareham to Stubbington Strategic Gap
Fig. 2: Relevant Policies and Designations

Drawing Ref: BRS.4989_74
 Client: Bargate Homes Ltd and Fareham Land LP

Date : 20/03/2020
 Drawn by : CW
 Checked by : JWA
 Scale : 1:20000 @ A4

Emerging Local Plan

- 1.9 The Council has committed to a review of its Local Plan to reflect emerging housing and employment needs until 2036. The strategic gap issue is addressed in the Draft Fareham Local Plan 2036 which states that:

“The primary purpose of identifying Strategic Gaps is to prevent the coalescence of separate settlements and help maintain distinct community identities. Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, protecting settlement identity and providing green infrastructure opportunities.”

- 1.10 Policy SP6, Development in Strategic Gaps, states that:

“In order to prevent the coalescence of urban areas and to maintain the separate identity of settlements, Strategic Gaps are identified between the following areas:

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

Development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements, the settlement pattern and the character of settlements...

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. Further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemary along with maintaining the separate identity of Peel Common.

A Strategic Gap designation will have a separate landscape value and could be a highly sensitive landscape which may render it unsuitable for development regardless of whether a gap status is in place at the site or not.”

Proposals for Strategic Growth

- 1.11 The Local Plan 2036 included a consultation on the 'Fareham Draft Local Plan

2036 Supplement'. The Supplement sets out the detail of the revised Development Strategy, identifies further proposed development allocations and any additional policies needed to address the amendments to the NPPF.

- 1.12 Notwithstanding the continued adoption of 'Strategic Gap' policies in this part of the Borough, the Supplement goes on to identify a 'Strategic Growth Area' situated across the landscape between Stubbington and Fareham, overlapping with a large part of the Strategic Gap (refer to **Plate 2**).

Plate 2: Extract from Fareham Draft Local Plan 2036 Supplement



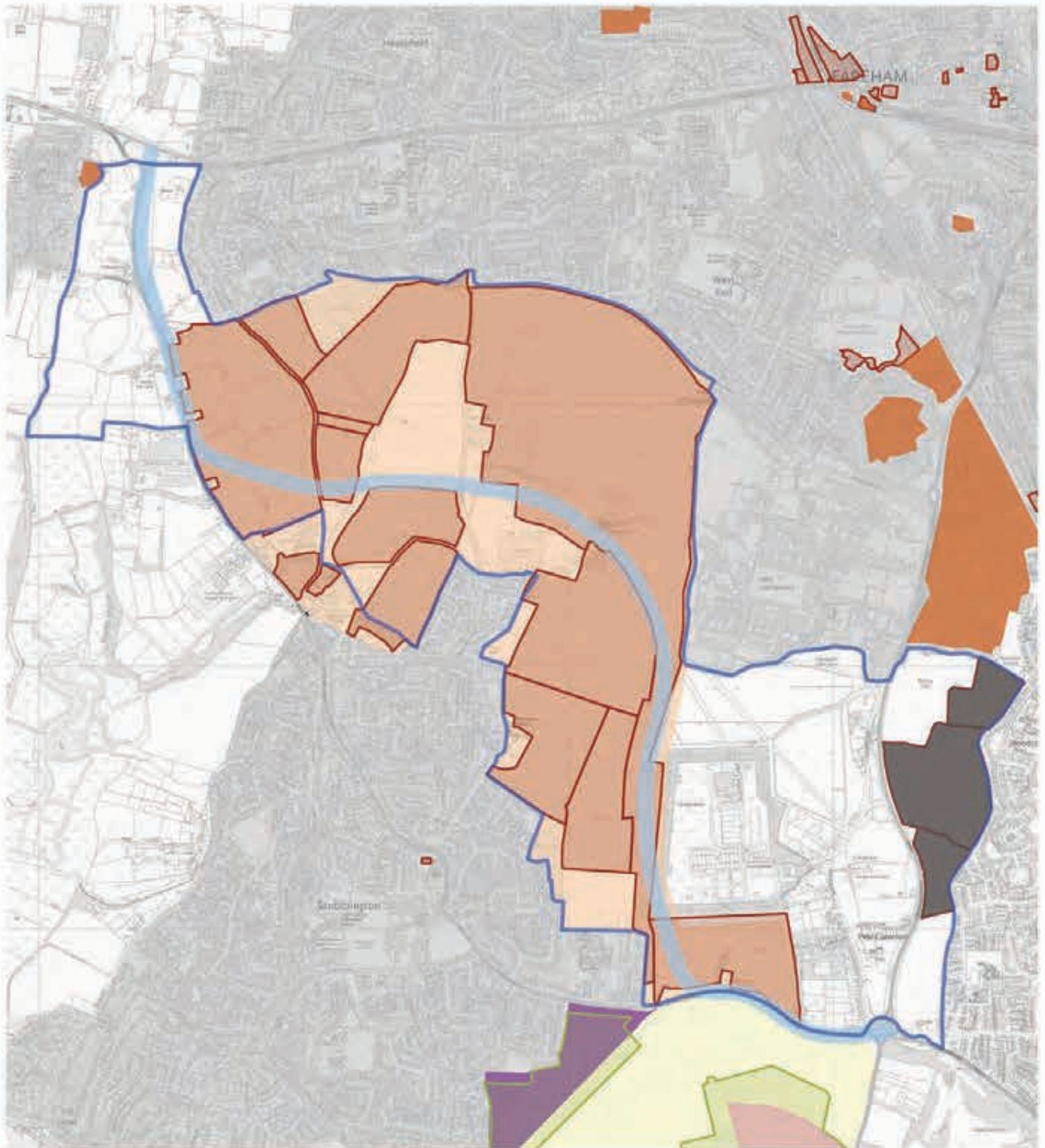
Figure 3.2. Proposed Strategic Growth Area: South of Fareham
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- 1.13 Despite the considerable overlap with the Strategic Gap, the accompanying policy for the 'Proposed Strategic Growth Area: South of Fareham' requires that:

"Development of an area wide masterplan should be informed by the following high-level principles and requirements:

b) The settlements of Fareham and Stubbington will continue to be separated with a Strategic Gap in between the settlements..."

- 1.14 Although the Strategic Gap area extends east up to the settlement edge of Bridgemary, including housing allocations and the recently constructed Fareham bypass (New Newgate Lane), the Strategic Growth Area has been drawn to an eastern limit up to the existing sewage works and solar farm that are present to the south-west of the edge of Fareham.



LEGEND

- | | | | |
|--|---|---|---|
|  | Study area |  | Employment, Open Space & Allotment Allocation at Hangars West (CS12)* |
|  | Stubbington Bypass Route (P/15/0718/CC) |  | Daedalus Airfield Strategic Development Allocation (CS12)* |
|  | Strategic Growth Area** |  | Developable SHELAA Housing Sites*** |
|  | Employment Areas* |  | Developable SHELAA Employment Sites*** |
|  | Employment Allocation at Hangars East (CS12)* |  | Allocations proposed in draft Local Plan** |

Sources:

- * Fareham Borough Local Plan Part 2 (adopted 2015)
- ** Draft Fareham Local Plan 2036 Supplement
- *** Fareham Local Plan 2036 Strategic Housing and Employment Land Availability Assessment (SHELAA) (2019)

SLVA: Fareham to Stubbington Strategic Gap
Fig. 3: Emerging and Potential Strategic Development

Drawing Ref: BRS.4989_75
 Client: Bargate Homes Ltd and Fareham Land LP
 Date : 20/03/2020
 Drawn by : CW
 Checked by : JWA
 Scale : 1:20000 @ A4

Purpose of the SLVA

- 1.15 Together, the emerging policy of the Strategic Growth Area and the route of the Stubbington Bypass will have a substantial influence on the Strategic Gap between Stubbington and Fareham and there is potential for conflict between the aims of infrastructure provisions, strategic growth, and separation of settlements.
- 1.16 Furthermore, the exclusion of the eastern part of the Strategic Gap (adjacent to Woodcot/Bridgemary) from the proposed Strategic Growth Area prevents a balanced and comprehensive assessment of how growth in this part of the Borough can be delivered whilst addressing matters of separation.
- 1.17 Consequently, this SLVA aims to consider the wider landscape area and its contribution to separation of Fareham and Stubbington; including reference to the parcels of land to the south of Fareham and west of Woodcot/Bridgemary.
- 1.18 The SLVA is undertaken at a landscape character scale to identify the core areas of Strategic Gap which are considered more fundamental to the function of the Strategic Gap, prevention of coalescence between settlements and maintenance of settlement identities. Outside of these Priority Areas the suitability of growth can then be further considered.

2.0 Approach and Methodology

Overview

- 2.1 This document presents a high-level 'strategic' landscape and visual appraisal of the Strategic Gap between Fareham and Stubbington, including the landscape around Peel Common.
- 2.2 The SLVA has been undertaken to present an understanding of the current nature and extent of the Strategic Gap, as currently defined, and how this will potentially work alongside the emerging policy proposals for the 'Strategic Growth Area'.
- 2.3 The appraisal has been undertaken at a landscape character scale, as oppose to a site specific scale, and is intended to give a strategic, high level overview of the characteristics of the landscape through the strategic gap area and the landscape components which define these.
- 2.4 Landscape features and elements provide the physical environment for flora and fauna and the associated importance of biodiversity assets. This SLVA does not consider the value, susceptibility or importance on ecology and biodiversity, nor does it consider impacts from an ecological stance.
- 2.5 Heritage assets such as Scheduled Monuments, Listed Buildings and Conservation Areas all contribute to the overall present-day landscape character, context and setting of an area. These aspects have been given consideration in the SLVA in terms of physical landscape resources (for example trees and hedgerows) and landscape character. However, this SLVA does not address the historic significance, importance or potential impacts on heritage assets and designations; these assets are assessed in the context of landscape and visual matters only.
- 2.6 The approach and methodology used for this SLVA has been developed using the following guidance documents:
- Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, 3rd Edition;

- Natural England (2014) An Approach to Landscape Character Assessment; and
- Landscape Institute Technical Guidance Note 06/19 (September 2019) Visual Representation of Development Proposals.

2.7 Reference has also been made to 'Landscape Character Assessment Guidance for England and Scotland Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity'. This is an older piece of guidance, but the approaches and concepts that it set out are well established and often used in strategic level studies of this type. The topic paper takes a character based approach to defining study areas and for informing judgements on sensitivity and capacity.

2.8 Concepts and procedures set out in the guidance have been adopted where appropriate.

Approach and methodology

Study Area

2.9 The study area includes the area of the existing Strategic Gap area between Fareham and Stubbington. This extends from the west, initially at the River Meon Valley close to Titchfield, extending east between Stubbington and Fareham, then southward, toward Peel Common, Woodcot and Bridgemary.

2.10 This SLVA considers existing landscape and visual receptors in the study area, including:

- physical landscape resources;
- landscape character;
- views/visual amenity; and
- together, how these influence the function and perception of the Strategic Gap.

2.11 The approach taken is broadly as follows:

- baseline survey - including desk study and field survey;
- baseline evaluation - initially establishing constraints, local landscape character and the contributing factors to character;
- determining the SLVA study parcels – based on local landscape character

and constraints; and

- landscape and visual appraisal - drawing together judgements on the role and function of the SLVA study parcels in relation to the physical and visual separation of settlement areas.

2.12 Field work was undertaken in March 2020 and included site survey across the different parts of the Strategic Gap, as experienced from rights of way, the local highway network and various parts of the settlement edge.

2.13 The SLVA considers the current Strategic Gap designation and a series of factors that influence its character. Relevant factors include:

- **Relevant designations and constraints**

- Landscape and related environmental designations indicate presence of specific elements or features that may contribute to landscape sensitivity. Often an absolute constraint or a constraint that would likely require specific mitigation. Indicative of lower potential for development.

- **Landform**

- Landform is often a distinguishing element in terms of differentiating areas of landscape character but is also influential in relation to the degree of openness or containment of a landscape and inter-visibility between different parts of a landscape.

- **Land use**

- In addition to defining landscape character, different land uses across an area can influence the scale, openness and condition (or quality) of a landscape. Landscapes in poorer condition are likely to have greater development potential.

- **Green infrastructure**

- The extent and nature of green infrastructure is a key component of landscape character, but also has a substantial influence on the openness and scale of a landscape, as well as inter-visibility. Strong green infrastructure networks can create a strong degree of containment or enclosure that can contribute to the capacity of a landscape and a greater development potential. Green infrastructure can form a constraint, although this is less likely to be absolute and more likely to be resolved through general mitigation.

- **Urban edge characteristics**
 - The characteristics of the existing urban edge will influence the interface with the adjacent landscape and reflect on its overall character, including its condition (or quality). The nature of the settlement edge (for example, modern residential, or larger scale employment) will form a key part of the baseline in terms of judging development potential but also has a strong influence on inter-visibility (in respect of separation).
- **Landscape character**
 - The overarching landscape character of an area will draw together the commonalities of the different landscape elements and features, defining the geographically distinct areas but also presenting sense of place.
- **Public/recreational access**
 - Access to the landscape for recreation and/or by the general public in relation to accessible amenity may contribute to landscape sensitivity. This aspect may form a constraint, although this is less likely to be absolute and more likely to be resolved through general mitigation.
- **Views/inter-visibility**
 - The views within and across different parts of the landscape, and inter-visibility between areas and also particular features in the landscape contribute to character and sense of place. These matters are also more strongly connected to the perception of separation, where visibility of a settlement edge, or a feature that denotes the presence of a settlement edge (for example a church spire) can help with orientation and understanding of the environment.

2.14 Following the evaluation of the baseline information a total of twelve different sub areas within the Strategic Gap have been identified, reflecting the variations and/or commonality in the physical landscape and local landscape characteristics.

2.15 These form the basis for the SLVA study parcels and subsequent appraisal of the role and function of the respective parcels in terms of the Strategic Gap.

2.16 Having identified the SLVA study parcels, and professional judgement is then applied to identify:

- **Strategic development potential within the relevant SLVA study**

parcel

- Considering at a high level the likely constraints and opportunities that development may need to address and the broad suitability of a part of the landscape to accommodate development (or otherwise).

- **Function within the existing Strategic Gap**

- Considering the role of the SLVA study parcel in the Strategic Gap in terms of how it functions in relation to physical and visual separation between different, relevant, parts of the settlement.

2.17 Having considered these two aspects, the areas of the existing Strategic Gap that are considered to as 'Priority' areas are identified. This is essentially the parts of the Strategic Gap where suitability for development is lowest or where the part of the Strategic Gap is more fundamental to the continued separation of Fareham and Stubbington.

3.0 Baseline Evaluation

Study Area

- 3.1 The study area extends across the landscape that separates Fareham and Stubbington, including the western edge of Fareham (close to Titchfield) and this narrow part of the River Meon valley (as shown on **Figure 1**).
- 3.2 The study area extends across a series of broader agricultural land parcels, crossed by Titchfield Road (to the west), Ranvilles Lane and Peak Lane (in the northern parts) and a series of public rights of way (PROW) around Newlands Farm and at Peel Common. The eastern parts of the study area include the smaller scale field parcels around Peel Common and at Woodcot/Bridgemary, and also the southern edge adjacent to the alignment of the Gosport Road, and the Daedalus Airfield.
- 3.3 In the context of the Strategic Gap, this part of the landscape is narrowest at the River Meon valley but also between the northern edge of Stubbington and the south-western edge of Fareham (associated with the complex of HMS Collingwood). Furthermore, this area will be subject to landscape change following the construction of the Stubbington Bypass, which will pass through the local landscape context, much as the Newgate Lane new road has done, to the west of Bridgemary.

Contextual Overview

- 3.4 There are three broad parts to the study area, based on the overarching physical characteristics. These include the valley formation of the River Meon area; the wider agricultural plain that is elevated above this (also being the largest scale of the broad areas) and the smaller scale enclosed landscape round Peel Common.
- 3.5 Within these areas there is further variation based physical landscape components, as well as a series of relevant policies and environmental designations.

Relevant Designations and Constraints

- 3.6 Environmental designations tend to apply to parts of the wider landscape, with relatively few located within the study area boundary (refer to **Figure 2**). Several nature conservation designations (SPA/SAC/RAMSAR/NNR) are present across the wider extent of the River Meon valley, including areas up to the coast. Scheduled Monuments, Historic Parks and Gardens and Conservation Areas are also present in the wider context, generally present in the urban areas. Within the study area, Oxleys Coppice is a designated SINC.
- 3.7 Aside from the Strategic Gap policy itself, there are numerous pockets of 'Open Space' both within the urban areas as well as situated toward the edges of the Strategic Gap, including the edges of Stubbington at Crofton Cemetery, allotments at Stroud Green Lane/Burnt House Lane and playing fields at Meoncross School and Crofton Secondary School; on the edge of Bridgemary, Brookers Field Recreation Ground Turks Avenue Open Space Play Area and extensive area of sports pitches off Newgate Lane are also present.
- 3.8 Emerging policy and strategic development are potentially influential in terms of the study area (refer to **Figure 3**). The route of the Stubbington Bypass passes through the landscape, broadly dividing the landscape between Fareham and Stubbington, but sitting close to the settlement edge at HMS Collingwood and then at the eastern edge of Stubbington, where the route connects to Gosport Road. Across the area are several SHELAA housing and employment sites which all sit within the context of a proposed Strategic Growth Area. This includes the parcel of land immediately on the western edge of Woodcot/Bridgemary allocated for housing (formerly HA2) which will bring the settlement edge out toward Peel Common at the alignment of 'Newgate Lane East'.

Landform

- 3.9 The overall landform is broadly consistent across the study area, formed as it is by a relative plateau at between +11m and +13m above ordnance datum (AOD); minor undulations add some limited variation across this wider area but otherwise the topography is not a major contributor to local variations in character. Notable variations in landform and topography occur within the Meon Valley, where steeper sided slopes form a localised ridgeline on the edge

of Fareham that falls down to the valley base at ca. +2m AOD. There is also a shallow, narrow localised valley situated between Ranvilles Lane and Peak Lane.

Land Use

- 3.10 Land use across the study area is broadly consistent, comprising larger scale open or semi-enclosed arable areas. Notable variations are present in discreet locations across the study area, including the large solar installation south of Fareham and Peel Common Sewage Treatment works.
- 3.11 More discreet variations include pockets of pastoral enclosures, often more enclosed and small scale, such as those within the Meon Valley and, including the pastoral valley base of the River Meon and also around Peel Common. Smaller scale still, and often more degraded in terms of landscape condition (or quality) are the equestrian uses present off the Gosport Road, close to Stubbington and also more extensive areas both east and west of Peel Common.

Green infrastructure

- 3.12 The scale and enclosure of the landscape is strongly influenced by the green infrastructure network across the area (refer to **Figures 4 and 6**).
- 3.13 Arable intensification has resulted in fewer field boundaries across much of the agricultural landscape between Fareham and Stubbington, with vegetation cover limited to small scale, shorter tree belts that contribute to an open landscape with more extensive inter-visibility between areas.

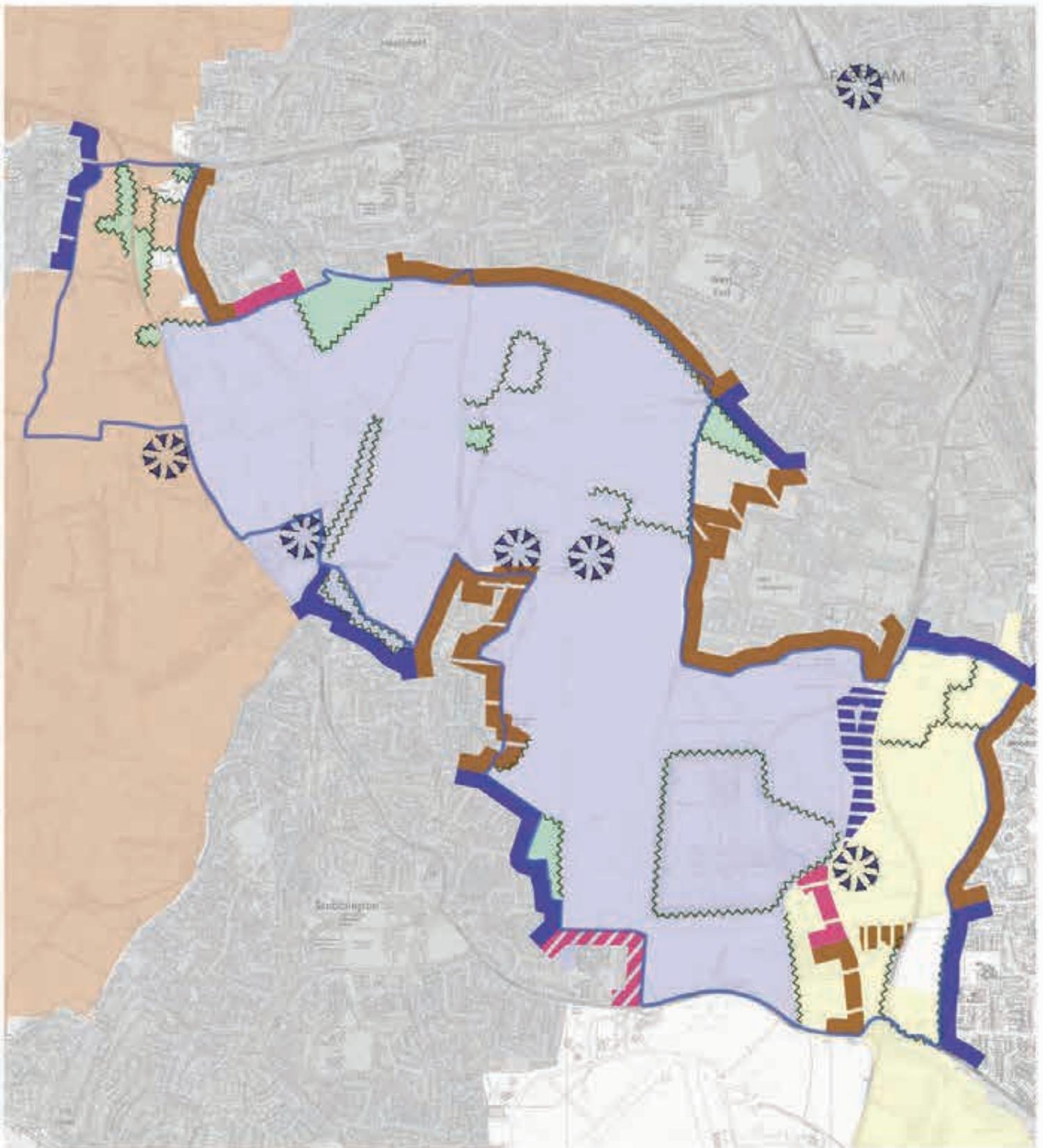
3.14 Green infrastructure is stronger within, and across the associated slopes, of the River Meon valley (to the north-west of the study area). A linear tree belt associated with the localised valley is also present to the north of Stubbington and this creates a feature in the local landscape. In the central parts of the study area green infrastructure tends to comprise tree belts and woodland blocks on the settlement edges. The boundary of Peel Common sewage treatment works is an exception here, with the banks and boundaries to the facility formed of a dense belt of mature trees and woodland and this effectively forms a 'green wall' between the landscape to the east and west. Closer to Woodcot/Bridgemary the smaller scale field patterns include a pattern of hedgerows, hedgerow trees and some tree belts which more strongly enclose this part of the landscape.

Urban edge characteristics

3.15 Despite the variation across the different parts of the settlement areas, the urban fringes are often characterised by a similar context of more modern residential development. Variation then applies subject to the exposure of the edge to the adjacent countryside and/or how strongly defined and identifiable the edge is (refer to **Figure 5**).

3.16 Within the River Meon valley the settlement edge tends to be heavily vegetated and poorly defined, due to the fragmented and slightly more historic settlement patterns.

3.17 Around Fareham, to the north of the study area, much of the urban character is defined by the strongly defined settlement edge (defined by the route of Longfield Avenue) but also by the modern residential built form which is visible across the landscape. Some vegetation cover is present at specific locations (such as Oxleys Coppice) but overall the settlement edge is exposed. The southern parts of Fareham are defined by the larger scale built form of HMS Collingwood. Although the boundaries of the complex are often vegetated, the buildings tend to be taller and of greater massing. On balance these are semi-open influences on the adjacent landscape.



LEGEND

	Study area	Fareham Landscape Assessment 2017: Landscape Character Areas		Settlement Edge Area	
	Isolated features		6: Meon Valley		Open
	Linear vegetation		7: Fareham-Stubbington Gap		Semi vegetated
	Vegetation blocks		8: Woodcol-Alver Valley		Heavily vegetated
					Weakly defined
					Partially defined
					Strongly defined

SLVA: Fareham to Stubbington Strategic Gap
Fig. 5: Landscape and Urban Edge Character

Drawing Ref: BRS.4989_77
 Client: Bargate Homes Ltd and Fareham Land LP
 Date : 20/03/2020
 Drawn by : CW
 Checked by : JWA
 Scale : 1:20000 @ A4



- 3.18 Stubbington benefits from a more strongly vegetated edge, with many of the residential areas set back behind tree belts, green spaces (including playing fields) or woodland blocks. The exception here is the small pocket of residential development on the southern edge of Stubbington, off Gosport Road, which remains clearly defined but is more prominent in the local landscape.
- 3.19 To the east of the study area, the settlement edges of Woodcot/Bridgemary are strongly defined in terms of their pattern and, although residential built form is perceptible, tree and woodland cover on the settlement edge (as well as the smaller scale landscape and field parcels) tend to soften the character and appearance here.
- 3.20 Peel Common sits close to the edge of Fareham, connected to the wider settlement edge context by the route of Newgate Lane East and emerging proposals for urban extensions in the remaining pocket of landscape. The current context of Peel Common is relatively indistinct, formed by some wayside and ribbon development along Newgate Lane (potentially dating to ca. early 1900s), but with no overriding or consistent architectural qualities. More notable scale land uses at Peel Common include the solar installation, extensive sports fields to the north and, the sewage treatment works which is strongly enclosed and defined by the mature tree belt that's surrounds it.

Landscape Character

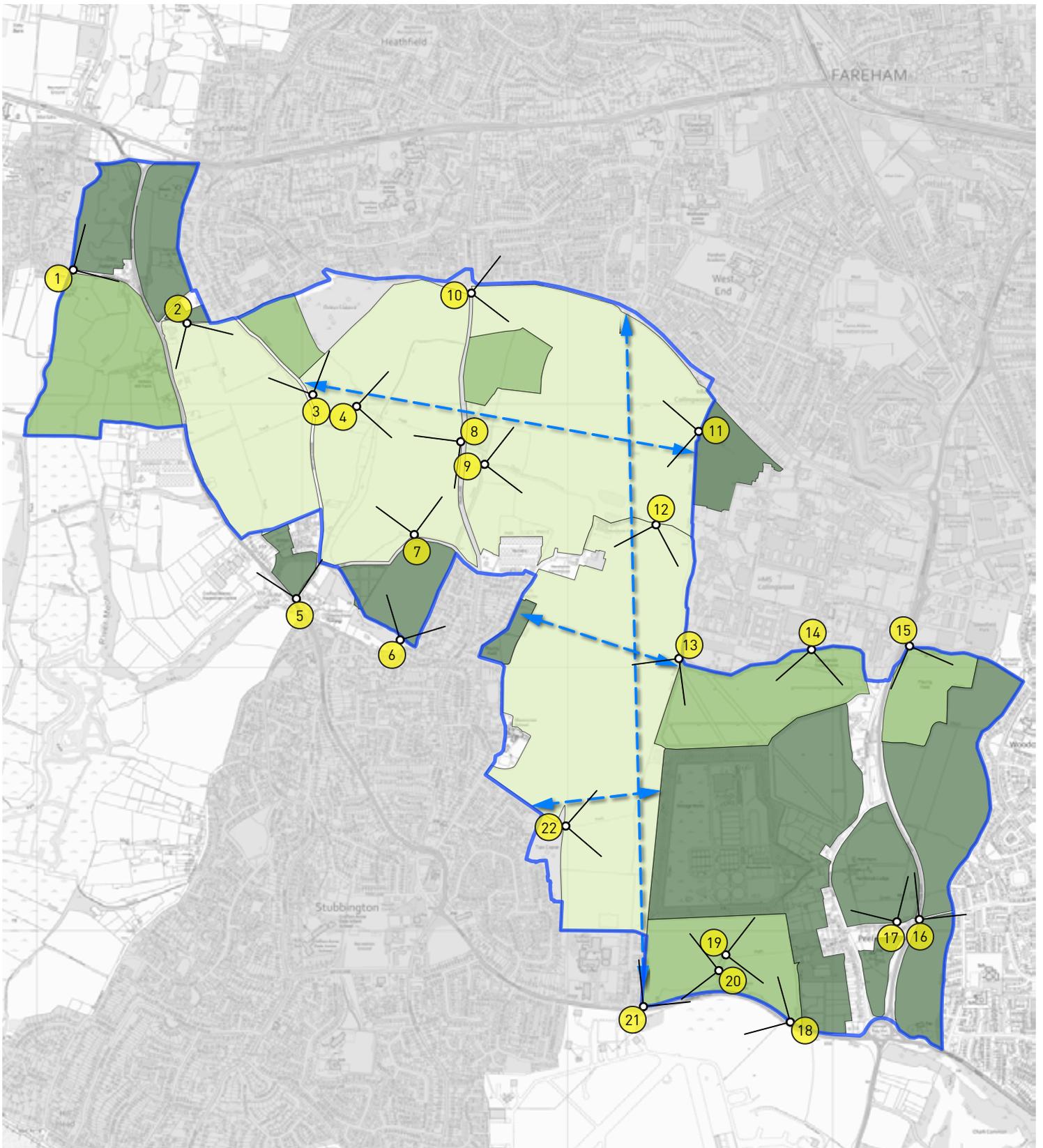
- 3.21 Landscape character in the area is defined formally by the Fareham Landscape Character Assessment (2017) (refer to **Figure 5**). Although the publication (and assessment) date precedes the construction of Newgate Lane East (and likely to omit the Stubbington Bypass) and that character is likely to have changed due to this urbanising influence, the definition of character areas as presented remains a useful starting point for a strategic level study, prior to undertaking more detailed site and local landscape specific assessments.
- 3.22 Three of the defined character areas are relevant to the study area, including a small part of the 'Meon Valley', the wider extent of the 'Fareham to Stubbington Gap', and the northern part of the 'Woodcot/Alver Valley'.

Public/Recreational Access

- 3.23 Public and recreational access to the landscape offer opportunities for the appreciation of landscape and visual amenity in general, whilst also providing the basis for human interpretation and perception of the character and appearance of the landscape.
- 3.24 The road network crossing this part of the landscape is one means of such access, however, is generally transient and gives limited opportunity to appreciate the 'undeveloped' aspects of this part of the landscape. Equally, many parts of the settlement edge tend to be represented by private residential views.
- 3.25 Recreational access to the River Meon valley is available through a number of public footpaths and informal trails, including provision of local car parking. The wider gap between Fareham and Stubbington is accessible from a number of PROW which cross the plateau; these connect Fareham to Stubbington at various locations from north to south.
- 3.26 Aside from the public footpath on the edge of Fareham (connecting Newgate Lane to Turks Avenue) and a PROW along Woodcote Lane, opportunities for access to the smaller scale agricultural landscape between Peel Common and Woodcot/Bridgemary is less frequent, however larger formal open spaces are present, such as Brookers Lane recreation ground.

Views/Inter-visibility

- 3.27 Considered separately from the opportunities for public and recreational access, views and inter-visibility across the landscape is also closely related to the landform (with little differentiating influence) and green infrastructure.
- 3.28 In general, this is an open, arable landscape however there are occasional landscape features present in the form of tree belts or larger scale individual buildings (farmsteads/glasshouses) which form intermittent barriers to longer distance views. The prominence and definition (or otherwise) of different parts of the settlement edges also influences inter-visibility between areas (refer to **Figure 6** and **Appendix B**).



LEGEND

- | | | | |
|--|----------------------|---|-------------------------|
|  | Study area |  | Open landscape |
|  | Illustrative view |  | Semi-enclosed landscape |
|  | Key inter-visibility |  | Enclosed landscape |

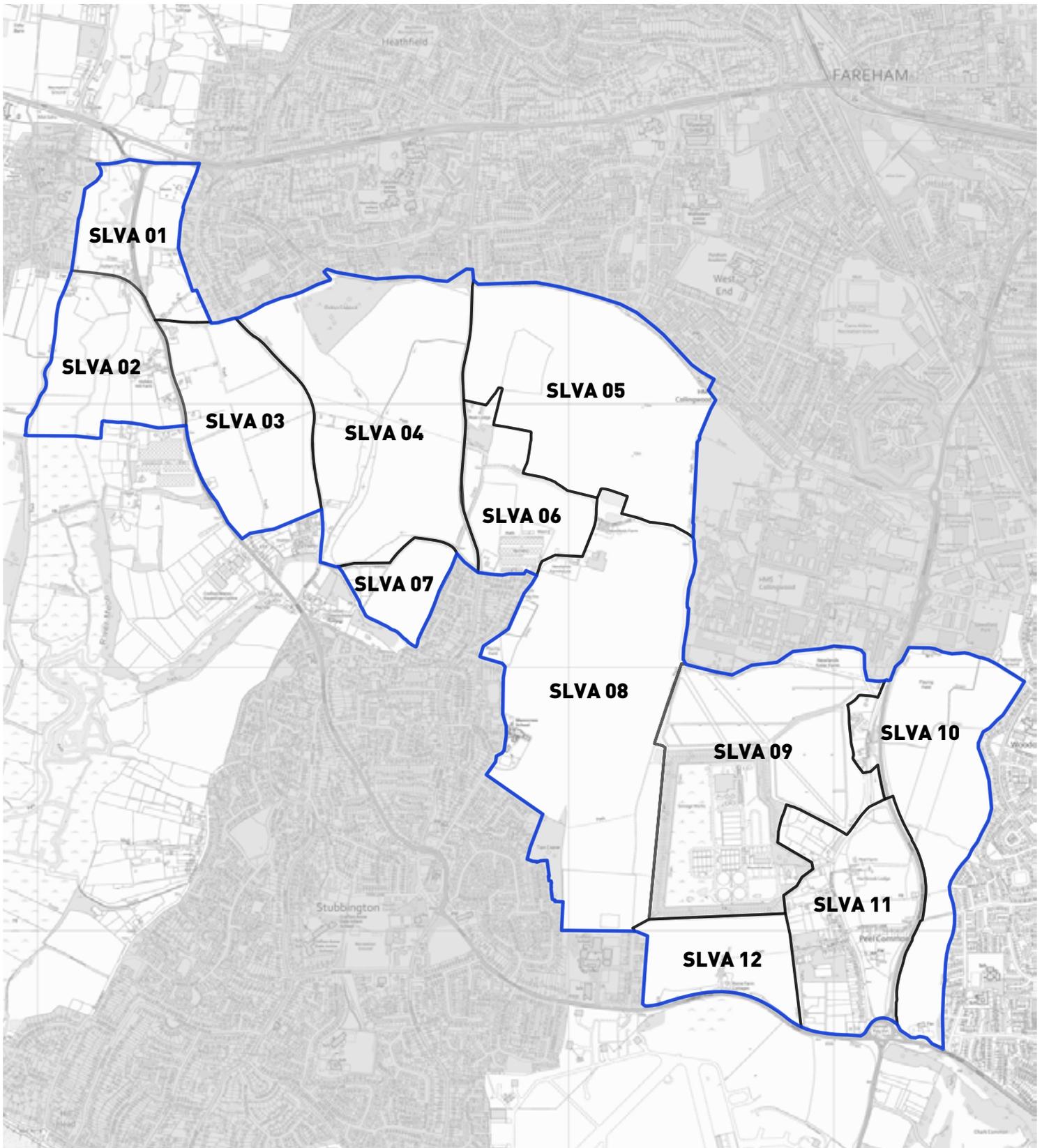
SLVA: Fareham to Stubbington Strategic Gap
Fig. 6: Inter-Visibility and Openness

Drawing Ref: BRS.4989_78
 Client: Bargate Homes Ltd and Fareham Land LP

Date : 20/03/2020
 Drawn by : NF
 Checked by : JWA
 Scale : 1:20000 @ A4



- 3.29 In general, inter-visibility across the existing gap is greatest between the northern edge of Stubbington and Fareham, where the settlement edges comprise exposed residential built form. There are clear east/west and north/south across the entirety of the landscape from various vantage points, including roads and PROW.
- 3.30 Variations to the overarching character include the River Meon valley, where the steeper sided sides to the valley and more heavily vegetated valley floor limit the extent of views, and also the landscape on the edges of Woodcot/Bridgemary, which are far more enclosed and smaller scale, defined as they are by the network of hedgerows and mature trees.



LEGEND

-  Study area
-  SLVA Land Parcels

**SLVA: Fareham to Stubbington Strategic Gap
Fig. 7: SLVA Land Parcels**

Drawing Ref: BRS.4989_79

Client: Bargate Homes Ltd and Fareham Land LP

Date : 20/03/2020

Drawn by : NF

Checked by : JWA

Scale : 1:20000 @ A4



4.0 Strategy for Priority Areas of the Strategic Gap

Study Parcels

- 4.1 Following the preliminary stages of this SLVA, and the evaluation of the baseline information, a total of twelve sub-areas to the study area have been identified (as shown on **Figure 7**). These are defined on the basis of the localised variations in landscape character, including the physical elements and features that are present in the landscape and help to distinguish discreet parts of the wider landscape and study area.
- 4.2 These sub parcels have each been considered in relation to the factors described in the previous section, and judgements drawn in terms of the overlap and tension between the proposals for Strategic Growth, and the existing policy of the Strategic Gap (refer to **Appendix A**).

Priority Areas of the Strategic Gap

Overview

- 4.3 Having considered the constraints and opportunities for each parcel, judgements have been made in relation to the location and extent where potential development on the settlement edges may come forward in a way that would be considered acceptable on landscape and visual terms. This process also considers the existing Strategic Gap and the parts of this considered to form a core part of the gap, or where they perform a more fundamental function in relation to physical and visual separation.
- 4.4 These areas have then been combined to form an overall 'priority' area that forms the core of the Strategic Gap going forward. The primary area has then been reviewed and refined based on the alignment of the proposed Stubbington Bypass, where this route (and future highways infrastructure) would contribute to either containment of development parcels, or lend itself to suitable physical boundaries for delineation of the settlement edge.
- 4.5 The Priority Areas of the Strategic Gap are intended to form the basis of more detailed assessment at a site specific level or based on specific proposals.

4.6 As identified by much of the high level analysis, mitigation measures will be a key consideration that influences the nature and extent of the Strategic Gap going forward. An iterative approach to design and mitigation during more refined stages of assessment may identify minor changes to the boundaries of the Primary Areas of the Strategic Gap, where such mitigation can be shown to be effective in avoiding or reducing landscape and visual impacts and successful in maintaining physical and visual separation between Stubbington and Fareham.

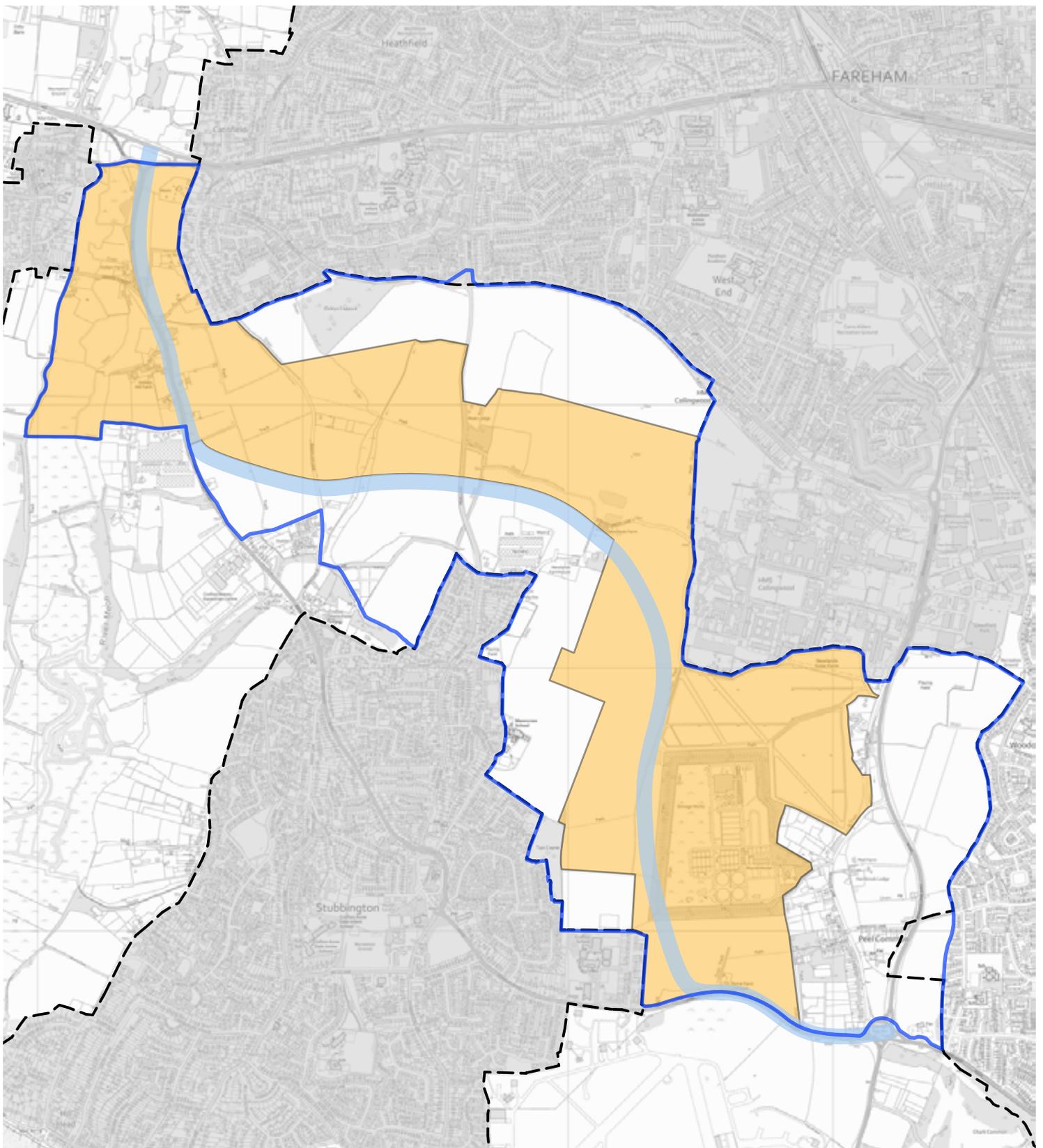
Purpose and Function

4.7 The Priority Areas of the Strategic Gap are largely defined by, and related to, the physical elements and features within the landscape, but also include some offsetting that relates to the alignment of the proposed Stubbington Bypass.

4.8 On the basis of this SLVA, the land proposed to be retained that forms the Priority Areas of the Strategic Gap is considered to:

- Retain recognisable and meaningful areas of open farmland between the main settlement areas;
- Maintain physical separation between the surrounding settlements, preventing physical coalescence;
- Maintain visual separation and retain key views through the landscape, maintaining the separate identities of the main areas of settlement as a consequence; and
- Along with a separate, but linked, consideration of Strategic Growth, present opportunities to maintain or enhance the green infrastructure network and reinforce local landscape character.

4.9 The Priority Areas of the Strategic Gap essentially comprise a broad arcing corridor, generally located centrally between Titchfield, Stubbington and Fareham, that would facilitate Strategic Growth on the settlement edges at Stubbington, Fareham and Woodcot/Bridgemary (refer to **Figure 8**).



LEGEND

-  Study area
-  Strategic Gap (CS22)
-  Stubbington Bypass
-  Priority Areas of the Strategic Gap

SLVA: Fareham to Stubbington Strategic Gap
Fig. 8: Strategy for Priority Areas of the Strategic Gap

Drawing Ref: BRS.4989_80
 Client: Bargate Homes Ltd and Fareham Land LP

Date : 20/03/2020
 Drawn by : NF
 Checked by : JWA
 Scale : 1:20000 @ A4



Summary of Priority Areas

4.10 Priority Areas of the Strategic Gap are summarised as follows:

The Meon Valley (Titchfield and Bellfield to Fareham)

4.11 The landscape between Titchfield and Fareham remains a pinch point in terms of physical distance and is heavily constrained to development by the nature of the river valley corridor and associated designations in this area. Furthermore, the proposed Stubbington Bypass will result in some modifications to the road network here as it is based on the current road alignment of the B3334. Consequently, SLVA parcels 01 and 02 are considered to be priority areas.

Ranvilles Lane West and East, Peak Lane to HMS Collingwood, and West of Newlands Farm

4.12 Notwithstanding some localised pockets of variation, there is some consistency in the character of the broader landscape between the northern edge of Stubbington and south-western edge of Fareham. In these areas the considerable scale of the landscape, and limited presence of landscape features create a strong sense of separation.

4.13 This includes SLVA parcels 03, 04, 05 and 07 which are more open, but relate to the settlement edges in different ways. In these SLVA parcels, a more central corridor is defined as a priority area, based on physical landscape components of the gap to be retained, but also on the basis that the fringes (directly adjacent to the settlement edge) demonstrate a greater capacity to accommodate some form of development.

4.14 This central corridor has also been shaped by the alignment of the proposed Stubbington Bypass, where land to the south of that route might have formed part of the priority area, however its severance has resulted in a strong relationship with land on the northern edge of Stubbington (for example SLVA Parcel 07).

Stubbington North (Oakcroft Lane)

4.15 SLVA Parcel 07 is not considered to be fundamental to the physical and visual

separation with Fareham and is considered to have capacity to accommodate development in landscape and visual terms. Consequently, it is not included as a priority area.

Stubbington East, Fareham South and Gosport Road

- 4.16 This is a broad part of the landscape with an overall consistency in its open, arable context, but also an area that passes through some of the narrowest part of the physical gap between Stubbington, Fareham and Peel Common. Based on the clear distinction, separation and inter-visibility between these parts of the settlement, generally uninterrupted by landscape components, large parts of SLVA Parcels 08, 09 and 12 are considered to be priority areas.
- 4.17 Some parts of the existing settlement edge are retained as open space and woodland, whilst others (often based on green infrastructure and the settlement pattern) reflect some capacity for development. In respect of the proposed Stubbington Bypass, the route arcs through SLVA Parcel 08, before running close to the boundary of this and adjacent parcel 09, consequently there is little scope to redefine the settlement edge of Stubbington along its alignment and maintain a meaningful and functioning part of the Strategic Gap.
- 4.18 SLVA 09 is included as a priority area on the basis that, notwithstanding that it contains low-level built form and infrastructure, the relative permanence of these areas, along with the strong network of green infrastructure mean that they are more fundamental in defining the settlement edge of Fareham in relation to Peel Common, with the gap to the west of this parcel more open and recognisable as an area of physical and visual separation to Stubbington.

Woodcot/Bridgemary and Peel Common

- 4.19 SLVA Parcels 10 and 11 form an area of landscape that is strongly enclosed by green infrastructure and reflect a smaller scale field pattern, associated with the settlement edge at Woodcot/Bridgemary that has good capacity for development in landscape and visual terms.
- 4.20 Furthermore, this part of the landscape has seen recent disturbance and severance due to the completion of the Newgate Lane East highways scheme and will see further consolidation of the settlement pattern through the emerging allocation (formerly HA2). Peel Common comprises indistinct

wayside and ribbon development and is strongly contained to the east and west and does not make a strong contribution to separation with Stubbington.

- 4.21 Consequently, SLVA Parcels 10 and 11 are not included as a priority area.

Connections with the wider Strategic Gap

- 4.22 Overall, the concentration of a Strategic Gap which focusses on the priority area identified in this SLVA have the potential to inter-connect with adjacent areas of the Strategic Gap. This includes areas within the River Meon valley, to the north of the A27 and to the west of Titchfield Road (south of Bellfield) and also to the south of Gosport Road, connecting with exiting open space and emerging proposals for strategic open space as a wider part of the Daedelus Airfield allocation.

5.0 Summary and Conclusions

Overview

- 5.1 Pegasus Group have been instructed jointly by Bargate Homes Ltd and Fareham Land LP to undertake a strategic landscape and visual appraisal (SLVA) of the Stubbington and Fareham 'strategic gap'.
- 5.2 This SLVA aims to determine the various landscape and visual constraints and opportunities regarding the landscape area between Fareham, Stubbington and Gosport (at Woodcot and Bridgemary) and draw judgements on its function and contribution in the context of the Strategic Gap that is identified in Local Plan Policy.
- 5.3 The study has been applied at a strategic, landscape character scale, and as such does not consider the merits or otherwise of specific development proposals or sites, rather it intends to broadly consider the appropriateness and constraints in relation to potential development within the landscape (considering both residential and/or commercial) and the main areas anticipated for the longer term function of a strategic gap.

Context

- 5.4 The Fareham Borough Local Plan consists of three parts and sets out the Planning Strategy for the Borough up to 2026, including Part 1 (the Core Strategy), Part 2 (Development Sites and Policies), and Part 3 (The Welborne Plan). The Strategic Gap is defined in the local plan under 'Policy CS22 Development in Strategic Gaps'. The Policy states that:
- 5.5 *"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."*
- 5.6 Furthermore, the overarching principle of the Strategic Gap policy are proposed to be taken forward through emerging policy of the Draft Local Plan 2036, whereby it notes 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'.

- 5.7 However, the emerging Draft Local Plan 2036 (Supplement) also sets out for proposals for a Strategic Growth Area, an area that includes a considerable overlap with the Strategic Gap. There remains a potential conflict between the aims of infrastructure provisions, strategic growth, and separation of settlements.
- 5.8 Consequently, this SLVA aims to consider the wider landscape area and its contribution to separation of Fareham and Stubbington; including reference to the parcels of land to the south of Fareham and west of Woodcot/Bridgemary. The SLVA is undertaken at a landscape character scale to identify the core areas of Strategic Gap which are considered more fundamental to the function of the Strategic Gap, prevention of coalescence between settlements and maintenance of settlement identities. Outside of these Priority Areas the suitability of growth can then be further considered.
- 5.9 The appraisal has been undertaken at a landscape character scale, as oppose to a site specific scale, and is intended to give a strategic, high level overview of the characteristics of the landscape through the strategic gap area and the landscape components which define these.

Appraisal

- 5.10 The study area extends across the landscape that separates Fareham and Stubbington, including the western edge of Fareham (close to Titchfield) and this narrow part of the River Meon valley. The study area then extends across a series of broader agricultural land parcels, crossed by Titchfield Road (to the west), Ranvilles Lane and Peak Lane (in the northern parts) and a series of public rights of way (PROW) around Newlands Farm and at Peel Common. The eastern parts of the study area include the smaller scale field parcels around Peel Common and at Woodcot/Bridgemary, and also the southern edge adjacent to the alignment of the Gosport Road, and the Daedalus Airfield.
- 5.11 In the context of the Strategic Gap, this part of the landscape is narrowest at the River Meon valley but also between the northern edge of Stubbington and the south-western edge of Fareham (associated with the complex of HMS Collingwood).

- 5.12 Furthermore, this area will be subject to landscape change following the construction of the Stubbington Bypass, which will pass through the local landscape context, much as the Newgate Lane new road has done, to the west of Bridgemary.
- 5.13 Following the preliminary stages of this SLVA, and the evaluation of the baseline information, a total of twelve sub-areas to the study area have been identified. These are defined on the basis of the localised variations in landscape character, including the physical elements and features that are present in the landscape and help to distinguish discreet parts of the wider landscape and study area.
- 5.14 These sub parcels have each been considered in relation to a series of factors relevant to landscape and visual matters, and judgements drawn in terms of the overlap and tension between the proposals for Strategic Growth, and the existing policy of the Strategic Gap.
- 5.15 The Priority Areas of the Strategic Gap are largely defined by, and related to, the physical elements and features within the landscape, but also include some offsetting that relates to the alignment of the proposed Stubbington Bypass.

Conclusions

- 5.16 On the basis of this SLVA, the land proposed to be retained that forms the Priority Areas of the Strategic Gap is considered to:
- Retain recognisable and meaningful areas of open farmland between the main settlement areas;
 - Maintain physical separation between the surrounding settlements, preventing physical coalescence;
 - Maintain visual separation and retain key views through the landscape, maintaining the separate identities of the main areas of settlement as a consequence; and
 - Along with a separate, but linked, consideration of Strategic Growth, present opportunities to maintain or enhance the green infrastructure network and reinforce local landscape character.

- 5.17 The Priority Areas of the Strategic Gap essentially comprise a broad arcing corridor, generally located centrally between Titchfield, Stubbington and Fareham, that would facilitate Strategic Growth on the settlement edges at Stubbington, Fareham and Woodcot/Bridgemary.
- 5.18 The areas of the northern and western edges of Stubbington can accommodate growth, as there are at Fareham (along Longfield Avenue) and also at Fareham to the east (between Peel Common and Woodcot/Bridgemary). Development in these areas would not fundamentally undermine the physical separation, nor the sense of separation and a clear distinction can be maintained between Stubbington and Fareham.
- 5.19 On balance it is considered that, following the approach that has identified Priority Areas for the Strategic Gap, emerging proposals for Strategic Growth between Stubbington and Fareham can be brought forward along with an enduring and meaningful Strategic Gap for the longer term.

1.0 APPENDIX A: Strategic Appraisal of Study Parcels

SLVA 01 – Meon Valley: Titchfield to Fareham

<p>Overview: Land parcel between Titchfield and Fareham, south of the A27 Southampton Road and junction with the A3334.</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • SINC • Conservation Area (nearby) • Strategic Gap • Stubbington Bypass 	
<p>Landform:</p>	<p>Defined by the River Meon valley, with low points ca. +2m AOD rising more steeply to the east and the alignment of the B3334.</p>
<p>Land use:</p>	<p>Smaller scale grazing and equestrian uses. General vegetated slopes/embankments and highways infrastructure also present.</p>
<p>Green infrastructure:</p>	<p>Small scale enclosure defined by tree belts and woodland blocks; additional scrub vegetation on steeper slopes.</p>
<p>Urban edge characteristics:</p>	<p>Generally well screened and heavily vegetated with limited/partial views of occasional residential dwellings.</p>
<p>Landscape character:</p>	<p>Meon Valley</p>
<p>Public/recreational access:</p>	<p>Formal PROW and informal trails within River Meon valley base.</p>
<p>Views/inter-visibility:</p>	<p>Limited inter-visibility between settlements but filtered views to poorly defined edge of both. Narrow gap whereby additional development between the two areas would be prominent.</p>
<p>Development potential within the Strategic Growth Area: Limited development potential due to constraints, both designations and physical landscape, including coalescence between Titchfield and Fareham.</p>	
<p>Function within the existing Strategic Gap: Parcel is bisected by the B3334 (Titchfield Road), the route also forming part of the proposed Stubbington Bypass. The remaining land to the east and west of the route forms the remaining narrow gap between settlement areas, providing a physical break but, given the limited prominence of the nearby settlement edges, also maintains visual separation.</p>	

SLVA 02 – Meon Valley: Bellfield

<p>Overview:</p> <p>Land parcel to the south-east of Titchfield, comprising a wider proportion of the River Meon valley from Bellfield across to Hollam Hill Farm and large-scale glasshouses.</p>		
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • SINC • SPA/SAC/RAMSAR/SSSI/NNR (to the south) • Strategic Gap • Stubbington Bypass (eastern edge) 		
Landform:	Defined by a broader part of the River Meon valley, with low points ca. +2m AOD rising to the east near Hollam Hill Farm and ca. +13m AOD at the B3334 (Titchfield Road).	
Land use:	Smaller scale grazing and mixed agricultural uses within the river floodplain and across valley slopes.	
Green infrastructure:	Small scale enclosure defined by combination of valley side but also presence of hedgerows and tree belts that define field parcels.	
Urban edge characteristics:	Generally well screened and heavily vegetated within the river corridor; parts of Bellfield more visible upslope to the west.	
Landscape character:	Meon Valley	
Public/recreational access:	Formal PROW and informal trails within River Meon valley base and connecting to Titchfield Road.	
Views/inter-visibility:	Limited inter-visibility between adjacent settlements but filtered views to the edge of Bellfield/Titchfield. Limited inter-visibility toward Fareham.	
<p>Development potential within the Strategic Growth Area:</p> <p>Limited development potential due to constraints, both designations and physical landscape.</p>		
<p>Function within the existing Strategic Gap:</p> <p>The parcel forms an open part of the landscape to the south-east of Bellfield. The northern part of the parcel contributes to the physical and visual separation between Titchfield and Fareham, whilst the central and southern parts of the parcel provide a transition out to the wider landscape context of the Meon Valley.</p>		

SLVA 03 – Ranvilles Lane West

<p>Overview: Land parcel between Titchfield Road (B3334) and Ranvilles Lane (closed to traffic), characterised by an open landscape of small to medium scale geometric arable fields, with generally no physical delineation between field enclosures (other than access tracks)</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • Strategic Gap • Strategic Growth Area • Stubbington Bypass (southern extent of land parcel) 	
<p>Landform:</p>	<p>Western extent of localised plateau landscape at ca. +13m AOD with slight undulations and overall fall toward the south.</p>
<p>Land use:</p>	<p>Large scale agricultural, predominantly arable with some nursery/market gardening</p>
<p>Green infrastructure:</p>	<p>Limited to tree and woodland belts on the boundaries of the parcel, including a thin hedgerow/tree belt on the eastern edge along Ranvilles Lane.</p>
<p>Urban edge characteristics:</p>	<p>Settlement is located directly to the north and south but generally comprises scattered, less well-defined settlement edges that are partially of heavily vegetated. There are wider views across adjacent parcel so more exposed parts of the settlement edges.</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap</p>
<p>Public/recreational access:</p>	<p>None within the parcel generally however a PROW skirts the northern edge (adjacent to the settlement edge of Fareham) and Ranvilles Lane is closed to traffic for the majority of its length providing a popular route for walking, running and cycling.</p>
<p>Views/inter-visibility:</p>	<p>Open views across the entirety of the parcel from north to south; partial views from adjacent locations also across to east and west. Glasshouses off the B3334 are often a prominent landmark.</p>
<p>Development potential within the Strategic Growth Area: Development adjacent to the existing settlement edges would need to consider the connection with the existing settlement patterns, as well as considering appropriate mitigation regarding the interface and transition with the countryside. Scale of the parcel, along with degree of openness, would facilitate development adjacent to the settlement edges whilst maintaining</p>	

a physical gap between them.

Function within the existing Strategic Gap:

This parcel provides physical and visual separation between the western edge of Fareham and northern edge of Stubbington. The scale of the gap is important here as it is generally experienced from the boundaries of the parcel (and not internally), such as from the route of the B3334, along Ranvilles Lane or from the PROW to the north. The proposed Stubbington Bypass will alter this where it passes closer to Stubbington at this point, reducing the physical separation and perception of the gap from the north.

SLVA 04 – Ranvilles Lane East

<p>Overview:</p> <p>Land parcel between Ranvilles Lane (closed to traffic) and Peak Lane, which connects the northern edge of Stubbington to Fareham. The land parcel generally comprises open arable land, however includes topographical variation in the form of a shallow valley, the valley itself characterised by an associated linear belt of trees. A woodland copse is located to the north of the land parcel.</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • SINC (Oxleys Coppice) to the north • Strategic Growth Area • Strategic Gap • Stubbington Bypass (southern extent of land parcel) 	
<p>Landform:</p>	<p>Overall part of wider plateau, generally at between ca. +14m and 12m AOD (sloping broadly down to the south overall), with localised valley crossing the centre of the parcel adding some diversity and presenting the northern edges as 'relatively' more elevated.</p>
<p>Land use:</p>	<p>Open and large scale, arable landscape.</p>
<p>Green infrastructure:</p>	<p>Some division of parcel into medium scale arable field patterns with hedgerows. Localised valley and associated drainage/stream includes a linear tree belt. Oxleys Coppice is a notable woodland block to the north of the parcel.</p>
<p>Urban edge characteristics:</p>	<p>To the north the urban edge of Fareham is well defined and generally exposed, with the exception of a specific section that is more heavily screened by Oxleys Coppice.</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap</p>
<p>Public/recreational access:</p>	<p>Limited to adjacent roads with the exception of a connecting PROW through the centre of the parcel. Ranvilles Lane, on the western edge of the parcel, is closed to traffic for the majority of its length providing a popular route for walking, running and cycling.</p>
<p>Views/inter-visibility:</p>	<p>Open views across the entirety of the parcel from north to south and also east to west. Green infrastructure present truncates views occasionally, but other direction tend to remain visible.</p>
<p>Development potential within the Strategic Growth Area:</p>	

Development adjacent to the existing settlement edges would need to consider the connection with the existing settlement patterns, where given existing exposed edges would be broadly consistent, particularly in relation to Fareham. Appropriate mitigation would be required to ensure a suitable interface and transition with the countryside. Scale of the parcel, along with degree of openness, would facilitate development adjacent to the settlement edges whilst maintaining a physical gap between them.

Function within the existing Strategic Gap:

This parcel provides physical and visual separation between Fareham and northern edge of Stubbington. The proposed Stubbington Bypass will alter this where it passes closer to Stubbington at this point, reducing the physical separation and perception of the gap from the north.

SLVA 05 – Peak Lane to HMS Collingwood

<p>Overview:</p> <p>Land parcel to the south of Fareham, and between Peak Lane and HMS Collingwood. The land parcel is predominantly comprised of arable land and its southern edge is defined by incidental green infrastructure and local tracks that provide access to Newlands Farm.</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • Strategic Growth Area • Strategic Gap • Stubbington Bypass (southern extent of land parcel) 	
<p>Landform:</p>	<p>Broadly uniform across relative plateau, situated at ca. +13 to 14m AOD. Few variations other than a slight rise up to the north-west corner of the parcel, close to a specific local 'high point' of ca. +15m AOD close to the junction between Longfield Avenue and Peak Lane</p>
<p>Land use:</p>	<p>Large scale arable. Route of overhead power lines crossing east to west.</p>
<p>Green infrastructure:</p>	<p>Includes linear tree belts along the boundaries of the parcel; greater density in the north-eastern corner. A mature tree belt is present that defines a smaller scale field parcel to the west. Young planting is located on the boundary between this and adjacent parcels 6 and 8.</p>
<p>Urban edge characteristics:</p>	<p>Generally exposed and well defined residential edge, with short sections remaining defined but more heavily screened. Open space within the grounds of HMS Collingwood adds to the green edge before eastern edges of the parcel become more strongly defined by the built form of the complex.</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap</p>
<p>Public/recreational access:</p>	<p>Limited to adjacent roads with the exception of a connecting PROWs along the eastern end southern edges.</p>
<p>Views/inter-visibility:</p>	<p>Strong degree of inter-visibility east to west and north to south, including longer distance views through the broader gap, toward Gosport Road. Generally, a clear understanding of the settlement pattern, but with the northern edge of Stubbington more complex due to the larger scale agricultural buildings around Newlands Farm which are prominent.</p>

Development potential within the Strategic Growth Area:

Strong connection to the existing settlement edge provides an appropriate baseline and contributes to capacity, with land further south encroaching into the gap and wider countryside context. In this part of the landscape, the route of Stubbington Bypass runs closer to Stubbington and Newlands Farm, leaving a greater degree of separation to the north of the route.

Function within the existing Strategic Gap:

This is a larger scale parcel that currently sits adjacent to the settlement edge contributing to the broad sense of separation between Fareham and Stubbington. There is also contrast between these areas with Stubbington being more heavily vegetated. Perception and interpretation of the gap within this parcel is heightened due to the opportunities for public access on the edges.

SLVA 06 – West of Newlands Farm

<p>Overview: Smaller scale parcel overall, situated to the north of Stubbington and defined by the variation in character between Peak Lane and Newlands Farm.</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • Strategic Growth Area • Strategic Gap • Stubbington Bypass (northern extent of land parcel) 	
<p>Landform:</p>	<p>Landform is generally situated at ca. +12m AOD and is similar to the wider context of the broader localised plateau that extends to the north and east.</p>
<p>Land use:</p>	<p>Smaller scale agricultural land parcel, including larger scale agricultural buildings, arable with some smaller scale pasture.</p>
<p>Green infrastructure:</p>	<p>Strong containment by linear tree belts and hedgerows, creating a smaller scale pattern of irregular field enclosures.</p>
<p>Urban edge characteristics:</p>	<p>Residential edge is visible to the east but contained locally by green infrastructure and not prominent in the wider landscape.</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap</p>
<p>Public/recreational access:</p>	<p>Limited access generally although a PROW crosses the northern part of the parcel, connecting to an access track to Newlands Farm.</p>
<p>Views/inter-visibility:</p>	<p>Vegetation and built form associated with the parcel presents some disruption to views and inter-visibility in close proximity. Further afield agricultural buildings can appear quite prominent and serve to denote this parcel, and its proximity to the settlement edge.</p>
<p>Development potential within the Strategic Growth Area: Overall this parcel is considered to have some capacity to accommodate development, based on its containment and context of the existing agricultural buildings within and adjacent to the parcel.</p>	
<p>Function within the existing Strategic Gap: The parcel is partially separated from the wider extent of the gap due to existing green infrastructure along its boundaries and the physical alignment of the farm access track. The</p>	

nature and scale and field pattern of the parcel also differentiate it from the wider large-scale arable areas. Although there are partial views across the gap toward Fareham the proximity to Stubbington is apparent.

SLVA 07 – Stubbington North: Oakcroft Lane

<p>Overview:</p> <p>Smaller scale parcel, enclosed by existing settlement pattern of residential areas, open space and local road network. The parcel is defined to the north by Oakcroft Lane, with the existing cemetery and open space to the south-west and residential settlement edge of Stubbington to the east and south.</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • Strategic Growth Area • Strategic Gap • Existing Open Space (Crofton Cemetery and associated green space) 	
<p>Landform:</p>	<p>Landform is generally situated at ca. +10m AOD but topography falls to the south and south-west into a small localised valley and minor watercourse.</p>
<p>Land use:</p>	<p>Smaller scale agricultural land parcel.</p>
<p>Green infrastructure:</p>	<p>Strong containment by linear tree belts along its northern (Oakcroft Lane) and eastern (residential) edges, with a further and denser belt of woodland along the south/south-west.</p>
<p>Urban edge characteristics:</p>	<p>Residential edge is visible to the east but contained locally by green infrastructure and not prominent in the wider landscape.</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap</p>
<p>Public/recreational access:</p>	<p>Limited access immediately outside of the parcel related to PROW to the south and access to the cemetery to the west. No direct access is apparent to the land parcel.</p>
<p>Views/inter-visibility:</p>	<p>Limited inter-visibility to and from the wider landscape with vegetation along Oakcroft Lane largely screening and, from within the settlement of Stubbington, existing built form and vegetation screening views.</p>
<p>Development potential within the Strategic Growth Area:</p> <p>Overall this parcel is considered to have a good capacity to accommodate development, based on its generally containment and limited overarching features that may contribute to landscape sensitivity (such as recreational access, features etc). Adjacent residential context also influences the parcel.</p>	
<p>Function within the existing Strategic Gap:</p> <p>Parcel remains a relatively isolated part of the landscape with a lack of inter-visibility to</p>	

nearby, and separate, areas of settlement. As such, whilst it remains an undeveloped part of the landscape there is limited contribution to a direct sense of visual separation. Physically the parcel is contained by road highways infrastructure of Oakcroft Lane and also Peak Lane.

SLVA 08 – Stubbington East:

<p>Overview: Larger scale area of landscape character forming the core of the current landscape character and associated strategic gap, providing belt of physical separation between Stubbington to the west and Peel Common to the east (including the existing solar installation and sewage treatment works).</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • SINC (Tips Copse) • Strategic Growth Area • Strategic Gap • Existing Open Space (including school playing fields) • Allotments • Stubbington Bypass (northern and eastern extent of land parcel) 	
<p>Landform:</p>	<p>Uniform topography, falling gradually from north to south between ca. +13m down to +11m AOD.</p>
<p>Land use:</p>	<p>Large scale, open, arable landscape.</p>
<p>Green infrastructure:</p>	<p>Limited green infrastructure present within the parcel, however the boundaries are strongly defined. In the north-east, by linear tree belts along the edge of the HMS Collingwood complex, to the east by the dense woodland belt that defines the edge of Peel Common sewage treatment works and to the west by tree belts and woodland blocks that generally characterises this edge of Stubbington.</p>
<p>Urban edge characteristics:</p>	<p>Settlement to the west is defined by Stubbington which is generally strongly defined and heavily vegetated. Where the edge pattern breaks down this is associated with amenity green spaces such as school playing fields and allotments.</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap</p>
<p>Public/recreational access:</p>	<p>Public access is available along the northern edge of the parcel and centrally through the parcel, generally providing east/west access between Stubbington and Peel Common/Fareham via the PROW network.</p>
<p>Views/inter-visibility:</p>	<p>PROW allow views from within the parcel, outward, and there is a distinct perception of the two separate areas of settlement. Partial views are also available north to other parts of the edge of Fareham and also south to Gosport Road.</p>
<p>Development potential within the Strategic Growth Area:</p>	

Openness in general and strongly defined settlement edges (with little reference to built-form) limit the potential capacity of this parcel for development. The introduction of the proposed Stubbington bypass will alter this somewhat and it is likely that location on the north-eastern edge of Stubbington will be more strongly contained by the highways infrastructure.

Function within the existing Strategic Gap:

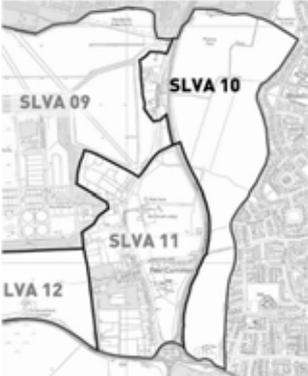
This parcel forms one of the narrowest parts of the gap between the distinct settlement area of Stubbington (to the west) and the strongly defined infrastructure of Peel Common sewage works (and adjacent solar installation) to the east. There are also parts of the parcel adjacent to the built form of HMS Collingwood, which denotes the edge of Fareham.

SLVA 09 – Fareham South

<p>Overview: Parcel comprises the solar installation and sewage treatment works at Peel Common. These existing elements are considered permanent within the landscape but both sit discreetly in terms of character, both being generally contained/screened by vegetation.</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • Strategic Gap • Stubbington Bypass (adjacent to western extent of land parcel) 	
<p>Landform:</p>	<p>Broadly uniform at ca. +10m AOD with a gradual fall to the south, across the embankments and profiled landform of the sewage treatment works.</p>
<p>Land use:</p>	<p>Includes large solar installation and sewage treatment works.</p>
<p>Green infrastructure:</p>	<p>Strong boundary vegetation enclosing the sewage treatment works with lower level vegetation and some tree belts present around the solar installation, including along Newgate Lane.</p>
<p>Urban edge characteristics:</p>	<p>To the north present in the form of the partially vegetated edge at HMS Collingwood.</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap</p>
<p>Public/recreational access:</p>	<p>PROW are present through, and adjacent to, the solar installation, providing access between the edge of Fareham and Peel Common (at Newgate Lane) and the open landscape to the west of the parcel.</p>
<p>Views/inter-visibility:</p>	<p>Limited inter-visibility due to the strong degree of containment by existing green infrastructure. Some partial views available across the existing gap toward Stubbington from the open parts of the parcel, away from the solar infrastructure.</p>
<p>Development potential within the Strategic Growth Area: Development potential is considered to be limited on the basis of existing land uses.</p>	
<p>Function within the existing Strategic Gap: Notwithstanding the presence of the solar infrastructure (which is generally low-level) and various built aspects of the sewage treatment works (which itself is not prominent due to surrounding green infrastructure) the parcel is considered to make a good contribution to the gap, given the physical and visual separation that they form between Peel Common and</p>	

Stubbington.

SLVA 10 – Woodcot/Bridgemary

<p>Overview:</p> <p>Parcel forming the eastern extent of the current strategic gap, inclusive of a smaller scale landscape overall that contains existing agricultural parcels along with some larger recreational facilities. The western edge of this parcel is defined by the highways corridor of the recently completed Newgate Lane East.</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • Strategic Growth Area (formerly HA2 urban extension) northern part of land parcel • Strategic Gap • Existing Open Space (sports fields to the north, Brookers Field Recreation Ground to south) 	
<p>Landform:</p>	<p>Broadly uniform at ca. +10m AOD with a gradual fall to the south, and Brookers Field Recreation Ground where the topography sits at ca. +9m AOD.</p>
<p>Land use:</p>	<p>Small to medium scale mixed agriculture, with larger scale amenity sports and recreation grounds.</p>
<p>Green infrastructure:</p>	<p>More extensive green infrastructure present in the form of hedgerows with mature hedgerow trees, defining the more intricate field pattern than is present in other parts of the gap.</p>
<p>Urban edge characteristics:</p>	<p>Residential edge of Woodcot/Bridgemary is often visible but partially screened by linear tree belts and hedgerows. Otherwise, to the north and south, defined by green infrastructure. The recently completed Newgate Lane East forms the western boundary to the parcel and is an urbanising feature, including substantial proportions of acoustic barrier fencing. A small parcel of wayside dwellings sits to the west of Newgate Lane East</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap & Woodcot/Alver Valley</p>
<p>Public/recreational access:</p>	<p>PROW present across the northern edge of the parcel, but with limited visibility into the wider extent. Playing fields are a mix of private sports pitches and public playing fields.</p>
<p>Views/inter-visibility:</p>	<p>Localised views often truncated or foreshortened by green infrastructure. Views into the local area of small-scale agricultural land. Some limited inter-visibility with Peel Common to the west, with little or no perception of the wider gap to Stubbington.</p>
<p>Development potential within the Strategic Growth Area:</p>	

There may be some capacity for development within this parcel, based on the adjacent context of the existing settlement edge, along with the containment, structure and screening provided by existing green infrastructure. However, this presents a change in character to the more open and somewhat degraded field patterns seen in the wider gap. Furthermore, the strong network of green infrastructure forms a specific constraint that will need to be given appropriate consideration as part of a mitigation strategy. Emerging policy includes for strategic development in this area (formerly HA2).

Function within the existing Strategic Gap:

This parcel makes a limited contribution to the wider context of the strategic gap, and is physically and visually separated from Stubbington, and the open parts of the existing gap, by the presence of green infrastructure across the parcel, the existing pattern of development at Peel Common and the physical built and green components of the sewage treatment works.

SLVA 11 – Peel Common

<p>Overview:</p> <p>Parcel situated to the west of Newgate Lane East and contained to the west by the sewage treatment works and solar installation. This includes the visible area of Peel Common which broadly comprises ribbon development along Newgate Lane.</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • Strategic Gap • Existing Open Space (Brookers Field Recreation Ground) (immediately to the east/south-east) 	
<p>Landform:</p>	<p>Small pocket of landform situated at ca. +9m AOD.</p>
<p>Land use:</p>	<p>Mixed land use including wayside and ribbon residential development along with individual farmsteads, churches and small commercial yards. These are set within a small scale pattern of mixed agricultural and equestrian land uses.</p>
<p>Green infrastructure:</p>	<p>Mixed hedgerows with hedgerow trees and short sections of more mature tree belts.</p>
<p>Urban edge characteristics:</p>	<p>Limited reference to formal boundaries of Peel Common, with the settlement appearing to be based on the progression of wayside and ribbon development since the early twentieth century. Relatively modern residential development and some small scale commercial centres are located close to occasional and older farmsteads. Overall it is not well defined as a coherent area of settlement character.</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap & Woodcot/Alver Valley</p>
<p>Public/recreational access:</p>	<p>PROW provides access from Peel Common (and Newgate Lane) to the west, toward Stubbington) and to the east, toward the edge of Bridgemary. The amenity of the latter has altered since completion of the Newgate Lane East highways scheme.</p>
<p>Views/inter-visibility:</p>	<p>Limited to localised views within the area and partial views across the existing settlement edge at Woodcot/Bridgemary.</p>
<p>Development potential within the Strategic Growth Area:</p> <p>There may be some capacity for development within this parcel, based on the adjacent context of the existing settlement pattern of Peel Common, along with the containment, structure and</p>	

screening provided by existing green infrastructure, adjacent sewage treatment works and context of Newgate Lane East. However, the network of green infrastructure forms a specific constraint that will need to be given appropriate consideration as part of a mitigation strategy.

Function within the existing Strategic Gap:

This parcel makes a limited contribution to the wider context of the strategic gap and is physically and visually separated from Stubbington, and the open parts of the existing gap, by the presence of green infrastructure across the parcel, the existing pattern of development at Peel Common and the physical built and green components of the sewage treatment works.

SLVA 12 – Gosport Road

<p>Overview:</p> <p>This parcel is located to the southern extent of the study area and strongly defined between the settlement areas of Peel Common (to the east) and the southern edge of Stubbington (to the west). Gosport Road and the sewage treatment works define the parcel to the south and north respectively.</p>	
<p>Relevant designations and constraints:</p> <ul style="list-style-type: none"> • Strategic Growth Area • Strategic Gap • Stubbington Bypass (western extent of land parcel) 	
<p>Landform:</p>	<p>Contained land parcel situated at ca. +10m AOD, falling gradually to the south at ca. 9m AOD, close to Gosport Road.</p>
<p>Land use:</p>	<p>Generally medium scale compartment of arable land, with isolated residential properties centrally, and also some equestrian uses fronting the Gosport Road.</p>
<p>Green infrastructure:</p>	<p>Liner belts of trees and woodland form strong boundaries along the northern and eastern edges of the parcel. Some limited tree and hedgerow vegetation within the parcel, situated around the residential dwellings</p>
<p>Urban edge characteristics:</p>	<p>Short section of more exposed residential development on the western edge of the parcel which forms the eastern extent of Stubbington. To the east, the settlement pattern of Peel Common is physically and visually separated by the shelter belt and a series of small scale paddocks.</p>
<p>Landscape character:</p>	<p>Fareham/Stubbington Gap & Woodcot/Alver Valley</p>
<p>Public/recreational access:</p>	<p>Some limited public access across the eastern edge of the parcel with a PROW that connects Gosport Road to the western edge of Peel Common.</p>
<p>Views/inter-visibility:</p>	<p>Open views across the parcel from Gosport Road, however these are highly transient based on vehicle users. Some narrow vistas north from a short section of Gosport Road, extending up to the distant edge of Fareham. Otherwise views are largely contained.</p>
<p>Development potential within the Strategic Growth Area:</p> <p>Given the strong degree of containment provided by physical features such as tree belts and highways infrastructure, this area has some capacity for development, however this would be physically separated by the alignment of the proposed Stubbington Bypass, creating more</p>	

isolated development areas to the east.

Function within the existing Strategic Gap:

In the context of the southern part of the study area and gap, this is a relatively narrow part of the gap with only limited physical separation between the western edge of Peel Common and Stubbington. The perception of this part of the landscape as a break between Stubbington and the wider extent of Fareham is influenced by the open character of the arable land, coupled with its relatively small scale and the well defined settlement edges to the east and west.

2.0 APPENDIX B: Illustrative Views



Viewpoint 1 | View looking north-east, from the public footpath at Bridge Street in the Meon Valley.



Viewpoint 2 | View looking south, from the public footpath between Titchfield Road and Ranvilles Lane.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 3 | View looking north, from the public footpath between Ranvilles Lane and Peak Lane.



Viewpoint 4 | View looking east, from the public footpath between Ranvilles Lane and Peak Lane.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 5 | View looking north, from the junction of Titchfield Road and Ranville Lane.



Viewpoint 6 | View looking north, from the amenity space off Marks Tey Road.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 7 | View looking north, from Oakcroft Lane.



Viewpoint 8 | View looking west, from the public footpath east of Peak Lane.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 9 | View looking east, from the public footpath east of Peak Lane.



Viewpoint 10 | View looking south-east, from Peak Lane (close to Longfield Avenue).

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 11 | View looking west, from the public footpath south of Longfield Avenue.



Viewpoint 12 | View looking south, from the public footpath on Tanners Lane, east of Newlands Farm.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 13 | View looking south-west, from the public footpath on Tanners Lane, adjacent to HMS Collingwood.



Viewpoint 14 | View looking south, from the public footpath on Tanners Lane, north of the solar farm.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 15 | View looking south-east, from Newgate Lane.



Viewpoint 16 | View looking north-east, from the public footpath east of Woodgate Lane.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 17 | View looking north-west, from Woodgate Lane.



Viewpoint 18 | View looking north-west, from Gosport Road.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 19 | View looking east, from the public footpath west of Peel Common.



Viewpoint 20 | View looking west, from the public footpath north of Gosport Road.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA





Viewpoint 21 | View looking north-east, from Gosport Road on the edge of Stubbington.



Viewpoint 22 | View looking north-east, from the public footpath on the edge of Stubbington.

SLVA: Fareham to
Stubbington Strategic Gap
Viewpoint Photographs

Drawing Ref: BRS.4989_81
Client: Bargate Homes Ltd and
Fareham Land LP
Date : 23/03/20
Drawn by : CW
Checked by : JWA



APPENDIX 8

PEGASUS REPRESENTATIONS TO THE DRAFT LOCAL PLAN SUPPLEMENT

WRITTEN REPRESENTATIONS TO FAREHAM DRAFT LOCAL PLAN SUPPLEMENT CONSULTATION

LAND AT NEWGATE LANE

ON BEHALF OF FAREHAM LAND LP AND BARGATE HOMES LTD.

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

Prepared by: Kate Holden

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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APPENDICES:

APPENDIX 1:	SITE LOCATION PLAN
APPENDIX 2:	SUMMARY OF SHELAA SITES WITHIN THE FAREHAM-STUBBINGTON GAP

1. INTRODUCTION

- 1.1 Pegasus Group has been jointly instructed by Fareham Land LP and Bargate Homes Ltd. to prepare representations to the consultation on the Supplement and supporting evidence documents published by Fareham Borough Council further to our representations made on the Issues and Options consultation in July 2019.
- 1.2 Fareham Land LP and Bargate Homes Ltd. have interests in an area of land between Newgate Lane and Newgate Lane East (the new relief road) in Peel Common. Applications for outline planning permission (refs. P/18/1118/OA and P/19/0460/OA) have been made at 'Land at Newgate Lane' which together will provide for the development of up to 190 homes.
- 1.3 Representations have been made in respect of the site in response to Regulation 18 consultation on the original version of the draft Local Plan in December 2017, and again in July 2019 on the Issues and Options version. The site continues to be promoted through the Local Plan process as it represents a sustainable and deliverable option to deliver much needed housing in this authority.
- 1.4 These planning representations will comment upon:
- Local Plan 2036 Supplement (the Supplement);
 - Strategic Housing and Employment Land Availability Assessment (SHELAA); and
 - Interim Sustainability Appraisal.
- 1.5 Whilst the identification of a Strategic Growth Area in the Fareham-Stubbington Strategic Gap is welcomed to boost housing numbers, these representations argue that this strategic policy overlooks the potential of available, deliverable and sustainable sites such as Land at Newgate Lane which are more appropriate in landscape terms.
- 1.6 We also argue that Land at Newgate Lane is preferable to competing medium-size sites, because it is sustainable, free from technical constraints and critically, nitrate-neutral.

- 1.7 Separate transport representations are made by Pegasus Highways, which will respond to the Supplement with a particular focus on the Infrastructure Delivery Plan (IDP).

- 1.8 These will support the argument set out in this document, by explaining that the location of Land at Newgate Lane is sustainable and its impact on the adjacent Newgate Lane is wholly acceptable. They will also touch on the role of the Stubbington Bypass in terms of its role as the focus of the proposed 'South of Fareham' Strategic Growth Area.

2. LAND AT NEWGATE LANE

- 2.1 The Land at Newgate Lane is a parcel of land with an area of just over 10 hectares within the ward of Peel Common. It is the subject of two live planning applications for the development of:
- Up to 75 dwellings at Land at Newgate Lane, North by Fareham Land LP (ref. P/18/1118/OA); and
 - Up to 115 dwellings at Land at Newgate Lane, South by Bargate Homes Ltd (ref. P/19/0460/OA).
- 2.2 The two proposals have been designed in tandem to ensure visual and physical connectivity which results in a cohesive and joined-up development for up to 190 homes.
- 2.3 The site is located adjacent to Newgate Lane, 200m west of the settlement of Bridgemary, approximately 1km north-east of the settlement of Stubbington and approximately 3km south of Fareham Town Centre.

APPENDIX 1: SITE LOCATION PLAN

- 2.4 The site comprises an area of land used for agriculture and equestrian use, which is dissected by the River Alver running north/south. The site boundaries and internal field boundaries are made up of hedgerows and mature trees.
- 2.5 Newgate Lane forms the western boundary of the site. The new relief road forms the eastern boundary of the site, with land at Newgate Lane (North) forming the northern boundary and Woodcote Lane forming the southern boundary. The existing dwellinghouse, Hambrook Lodge, which is located on the western part of the site is not included within the land interests and is not promoted for development.
- 2.6 The site is located outside the defined settlement boundary identified in the Local Plan policies map, in a 'Strategic Gap'. The site is not subject to specific statutory or non-statutory landscape related planning designations.

- 2.7 It is partly covered by an area identified as 'low value' for Brent Geese. There are no other known statutory or non-statutory landscape or ecological designations on the site. Hambrook Lodge, which is excluded from the site boundary contains an area identified as a Priority Habitat (traditional orchard).
- 2.8 The site is located in Flood Zone 1. The River Alver flows in a southerly direction through the western part of the site and is classified as a 'Main River' by the Environment Agency. A number of ordinary watercourses demarcate the existing field boundaries, which all discharge to the River Alver catchment.
- 2.9 Overhead electricity cables transect the site diagonally running in a north-west to south-east direction.
- 2.10 Carriston Cottage (Grade II listed) lies 50m west of the site on the western side of Newgate Lane. Foxbury Cottages and Farmhouse (Grade II listed) lie approximately 250m to the north.
- 2.11 Peel Common Wastewater Treatment Works is located approximately 200m to the west of the site.
- 2.12 Public Rights of Way footpath 71b provides a link to Tips Copse from Newgate Lane immediately west of the site via the Wastewater Treatment Works. Footpath 71c provides a link to Gosport Road via Albert Road.

3. HOUSING DELIVERY

- 3.1 The previous draft Local Plan planned for 11,300 new dwellings over the plan period, with a delivery target of 455 dwellings per annum between 2011-2034 and 420 dwellings per annum between 2034-2036, taking into account the OAHN requirement and the accelerated delivery sought under the PUSH Spatial Position Statement.
- 3.2 The Standard Methodology will result in a requirement of 520 dwellings per annum, which was the 'headline' presented in the July 2019 consultation. However, we argued that this was an underestimation of local need as it does not take into account:
- the requirement for an appropriate buffer to be applied in accordance with paragraph 73 of the NPPF; and
 - any unmet need within the PUSH authorities.
- 3.3 We are therefore pleased to see these considerations have now been acknowledged in table 3.1 of the supplement. However, it is disappointing that this further need has not been quantified.
- 3.4 Moreover, we continue to uphold our concerns about:
- the expected rate of housing delivery at Welborne; and
 - the failure of the Council to yet establish any long-term solution to the 'nitrate issue' which facilitates applications progressing smoothly through the development management process without prohibitive pre-commencement conditions.
- 3.5 It is important that the final housing requirement is significantly robust to deal with these potential delays.

4. STRATEGIC GROWTH AREAS: THE FAREHAM – STUBBINGTON STRATEGIC GAP

4.1 The Supplement identifies two new Strategic Growth Areas (SGAs) which may play a role in meeting the total housing requirement, which include the 'South of Fareham' SGA.



Figure 3.2 from the Supplement, with the location of Land at Newgate Lane marked in pink

4.2 We welcome the identification of further development sites to meet the increased housing requirement for the reasons discussed above, and we have previously highlighted the potential of land within the Fareham-Stubbington Strategic Gap in meeting this need without offending its primary objectives.

- 4.3 However, we question how the LPA has arrived at the exact boundary for the SGA through the site selection process in the SHELAA, specifically with regard to the *deliverability* and *suitability* of those sites.

Is the SGA Deliverable? Are there additional opportunities for more reliable sites within the Gap?

- 4.4 Turning first to deliverability, the Supplement text is transparent that the detail of the SGAs is not fully developed. At para. 3.20 it states:

“The identification of two Strategic Growth Areas is not the same as a housing allocation as there is further work required to understand the role these areas could play in meeting the overall housing requirement. The intention is to work with landowners and site promoters to develop a Council-led masterplan which will focus on delivery of community benefits as part of good growth.”

- 4.5 This process will take considerable time and there is no evidence provided which sets out how or when the masterplan will come forward. Indeed, although the main promoter Hallam Land Management has considered indicative masterplanning through its outline planning application ref. P/15/1279/OA, which was submitted in February 2016, Fareham Borough Council's website now confirms that it has received instruction from the applicant to withdraw the application.
- 4.6 This is in contrast to Land at Newgate Lane, and the land on the east of the Newgate Lane Relief Road (formerly known as the HA2 allocation, as identified in dark grey in the plan above), both of which are the subject of live planning applications¹.
- 4.7 It is not yet clear what the total number of homes to be delivered within the SGA will be, but assuming the identified parcels (235 ha) all come forward at an average yield of 30-35 dwellings per hectare on 60% of the developable land, then it could be between 4,230-4,935 dwellings.
- 4.8 Devising a masterplan and agreeing a framework for planning obligations and associated infrastructure across the site will take some years. The sites are within the ownership of different landowners (with developer options) and the parties will

¹ Part of the HA2 draft allocation is the subject of a live planning application – this proposes up to 100 dwellings on the southern part of that site (with proposals for the residual 375 dwellings to come forward at a later date).

need to agree the delivery of highway and community infrastructure to support the housing growth. Indeed, the report 'Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?'² demonstrates the length of time between first identification of a site (within a Local Plan) to submission of first planning application ('lead in time') was 4 years on average for all large sites (500+ units), albeit longer for those with 2000+ units.

- 4.9 This timescale is broadly consistent with Welborne, which was initially identified in the Draft Part 3 Plan in April 2013, which was adopted in June 2015, and followed by the submission of an application in March 2017.
- 4.10 From this point, the average length of time between planning application submission and delivery of first dwelling on site was identified in the report as 6.9 years on average for sites of 2000+ units.
- 4.11 This timescale is also broadly consistent with progress at Welborne to date, whereby following resolution to grant permission in October 2019, the S.106 Agreement is now being prepared. Buckland's website states that, subject to the timings of the planning process, site preparation works could start in early 2021. Site completions could therefore be expected in 2022/2023 (albeit this could still be very ambitious since there is a funding gap for the Junction 10 highways improvements).
- 4.12 On this basis, it would be unreasonable to assume that any units would be likely to come forward in the SGA within the next 10 years. Whilst it may be possible to deliver large allocations more quickly, the SHELAA and Supplement do not include any evidence to this effect.
- 4.13 As such, there will clearly be an additional need to rely on medium-size allocations to support strategic sites by bolstering growth which can come forward in the first part of the plan period. Other development sites within the Strategic Gap, e.g. Land at Newgate Lane, offer such opportunities.
- 4.14 There are also a number of important technical considerations which will need to be addressed. Of key importance is the ability for the necessary highway improvements and access works to come forward (which are currently unknown),

² Nathaniel Lichfield & Partners, November 2016

and the need to achieve nitrate neutrality or otherwise appropriate off-setting in accordance with a scheme adopted by the LPA.

4.15 Issues relating to noise and air quality arising from the Stubbington Bypass will also need to be considered and appropriate mitigation established.

4.16 By contrast, the proposals for Land at Newgate Lane have already:

- Proposed possible highway solutions;
- Demonstrated nitrate neutrality; and
- Established no adverse impacts in respect of other technical matters (with appropriate mitigation where necessary).

Are the SGA sites suitable? Are there equally or more suitable sites?

4.17 Secondly, we must consider the suitability of the SGA sites compared to others within the Fareham-Stubbington Strategic Gap.

4.18 The SHELAA provides an assessment of all proposed sites within the SGA based on a number of key criteria which we have summarized in the table at **Appendix 1**, together with our own assessment of Land at Newgate Lane, North (ref. 3161) and Land at Newgate Lane, South (ref. 3129) on the same criteria.

APPENDIX 2: SUMMARY OF SHELAA SITES WITHIN THE FAREHAM-STUBBINGTON GAP

4.19 Aside from the obvious fact that the sites are all greenfield land outside the settlement boundary, it is apparent that the sites identified mostly share similar constraints to Land at Newgate Lane, namely: the inclusion of some flood zone 2 or 3 land; the presence of safeguarded minerals; being identified within the Solent Brent Geese and Wader strategy; and the loss of some “Best and Most Versatile” Agricultural Land (albeit in contrast to the SGA sites, the Land at Newgate Lane does not contain any grade 2 agricultural land). None of these constraints are deemed to be prohibitive.

4.20 Rather, the Land at Newgate Lane is rejected for purely landscape/character reasons as follows:

“Development in this location would not be in keeping with the settlement pattern and would change the settlement character of Peel Common. The site is therefore considered unsuitable for residential development.”

4.21 It is therefore perverse that that there is no assessment of such matters in the individual site appraisals in the SHELAA, if this is alleged to be the determining factor.

4.22 This is contrary to the earlier October 2017 Evidence Base document ‘Background Paper: Housing Site Selection’ which at paras. 1.2-1.3 states:

“It is important that site allocation decisions are supported by clear reasoning. To this end, the process has been designed to:

- Take account of national planning policies, principles and objectives;*
- Identify, early into the site selection process, those that are unsuitable, unavailable or undeliverable (i.e. discounted sites);*
- Improve transparency so that anyone can have a clearer idea of how a particular outcome has been arrived at;*
- Ensure that site selection takes account of the need to achieve sustainable development;*
- Where possible, ensure the sites selected provide the best match to the Site Selection Priorities/Refining Points (as outlined in Section 3 of this paper);*
- To ensure a consistent approach is undertaken to the assessment and consideration of potential housing sites.”*

4.23 The decision to reject Land at Newgate Lane as a potential allocation despite a proper landscape or character assessment is a failing of the SHELAA. The assertion that development would “not be in keeping with the settlement pattern” has not been explained or justified.

- 4.24 The settlement of Peel Common is a ribbon development comprised of predominantly 20th century properties which have been developed along Newgate Lane and Woodcote Lane. It is not considered to be an area of landscape or historic sensitivity, and nor does its growth and development pattern represent, in our view, any overriding reason to resist new development alongside.
- 4.25 On a separate point, it is also completely unfathomable that no assessment or discussion is provided in respect of the effect of the chosen sites on the integrity of the Strategic Gap, particularly given that if the entire SGA was developed as drawn, Stubbington and Fareham would entirely coalesce (physically) – avoidance of which is one of the chief aims of the existing Strategic Gap policy. A different pattern of site selection would not necessarily have this effect, for example the development of the eastern part of the gap including Land at Newgate Lane.
- 4.26 In our previous representations, we demonstrated that the proposed development at Land at Newgate Lane would not be contrary to policy CS22 of the current Core Strategy, which does not permit development where it significantly affects the integrity of the Strategic Gap, having regard to its three key objectives:
1. Openness and Sense of Separation;
 2. Defining the Settlement Character and Preventing Coalescence
 3. Extent of Gap Required
- 4.27 We made the point that although the proposed development site is a greenfield site within the countryside, it would not represent isolated development, but rather an extension to HA2 and Bridgemary, with Newgate Lane acting as an existing containment line for the suburb.
- 4.28 Bridgemary is a predominantly mid-twentieth century, medium-density development with a typically suburban layout including a number of crescents and cul-de-sacs. It hosts a small local centre and schools, in contrast to Peel Common which does not have any services or community facilities, save for the Evangelical Church.
- 4.29 Peel Common is situated in close proximity to Bridgemary, which can be seen in views from the settlement. It is well connected on foot via Brookers Lane.

- 4.30 We would argue that the development of Land at Newgate Lane would not be contrary to the settlement pattern of the area, when read in the context of all its surroundings, not just Newgate Lane.
- 4.31 We also stressed that the proposed development at Land at Newgate Lane would not have an adverse effect on local landscape character. Indeed, this eastern part of the gap falls within a different character area (Woodcot-Alver Valley character area) from that now proposed as the SGA (Fareham-Stubbington Gap character area). Whilst the Fareham-Stubbington character area is characterised by open land, the Woodcot-Alver Valley character area is much more contained and suitable for development, as proven by the proposed allocation of the HA2 site.
- 4.32 Other impact of urbanising features including Newgate Lane relief road and the waste water treatment works also need to be taken into account in terms of their effect on the local character. This is accepted in the table on page 22 of the Interim Sustainability Appraisal which notes:

“Around the sewage works and solar farm in the south-east corner [of the Fareham-Stubbington Gap], the landscape is considered to be of lower value on account of the utilities which have completely altered the character of the immediate area, although they are relatively well-screened by wooded bunds and planting.”

- 4.33 Indeed, the character of a site and surrounding area is defined by both the natural and built environment, having regard to the setting in which it sits. The suggestion that the linear settlement pattern of Peel Common is definitive of the character of the wider area, and therefore prohibitive to further development, is too simplistic and fails to acknowledge the relationship of Land at Newgate Lane with Bridgemary.

5. OTHER PROPOSED ALLOCATIONS

5.1 The Supplement also proposed additional stand-alone allocations to contribute the increased housing requirement identified, comprising:

- Rookery Farm – 20ha in Sarisbury with a potential capacity of 150 dwellings;
- 1-2 The Avenue – 0.2ha in Fareham Town Centre with a potential capacity of 9-20 dwellings; and
- 20 Botley Road – 0.1ha in Park Gate with a potential capacity for 5 dwellings.

5.2 Whilst the section above explains why Land at Newgate Lane could be an *additional* site for development within the Fareham-Stubbington Strategic Gap, this section considers why Land at Newgate Lane constitutes a preferable *alternative* site to Rookery Farm as a medium-size allocation.

5.3 A comparison summary of site constraints is provided in the table below.

	Land at Newgate Lane c. 10 hectares	Rookery Farm c. 20 hectares
Current Use	Agricultural	Recycling business, remnant orchard, vacant grazing
Potential Yield	190	150
Agricultural Land Grade	3a/3b	2/3a/3b/3c
Minerals and Waste 2016 Safeguarded Site	Y	Y – active minerals site
Countryside	Y	Y
Nitrate Neutrality	Neutral	NOT Neutral
Conservation	Not constrained	Immediately adjacent to Rookery Farmhouse (Grade II) and other Grade II listed buildings
Ecology	Not constrained	Not constrained
Highways	Solutions to Newgate Lane T-junction proposed	Potential four-arm roundabout required
Noise	Suitable, with mitigation	TBC – adjacent M27
Air Quality	Suitable	TBC – adjacent M27

Table 1: Comparison of Constraints for Land at Newgate Lane and Rookery Farm

-
- 5.4 Critically, Land at Newgate Lane is already proven through the planning applications to be nitrate neutral, and can therefore come forward immediately subject to planning. This is in contrast to Rookery Farm – which is a brownfield site and therefore unable to be nitrate neutral without mitigation – whose timetable for delivery will be in the hands of Natural England’s emerging nitrate guidance and reliant upon the adoption of a yet-to-be-determined mitigation regime.
- 5.5 In addition, whilst Land at Newgate Lane has already been assessed by the LPA and found to be sound in relation to technical matters such as noise and air quality, the position of Rookery Farm adjacent to the M27 may well present significant limitations to delivery.
- 5.6 Moreover, further consideration will need to be given to the design and access at Rookery Farm, including crucial evidence of a highways access solution which does not adversely impact the wider network and an illustrative masterplan which demonstrates how the proposal could satisfy the provisions of the NPPF with regard to potential harm to the local heritage assets.
- 5.7 For these reasons, we would assert that Land at Newgate Lane is a preferable and more robust site to contribute towards the five-year housing land supply.

6. OTHER POLICIES AFFECTING HOUSING DELIVERY

Policy XX: Five Year Housing Land Supply Policy

- 6.1 Policy XX at para. 3.18 of the Supplement is effectively proposed to supersede the provisions of existing policy DSP40.
- 6.2 Notwithstanding our comments above, we are pleased to see the intention to carry forward its flexible approach to facilitating development outside of settlement boundaries in the absence of a five-year housing land supply.

Policy NEXX: Landscape

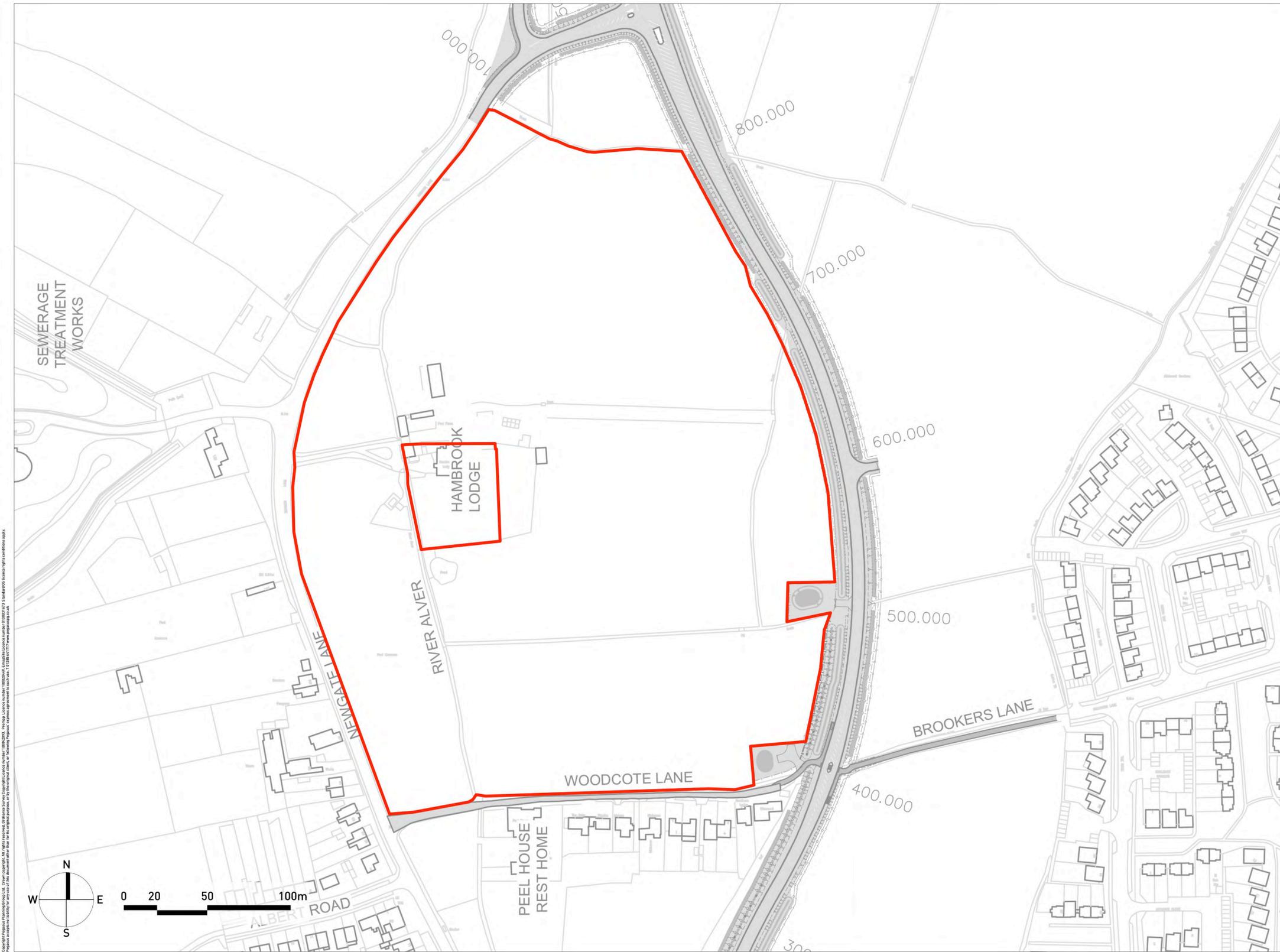
- 6.3 We support the policy proposed at para. 4.17 which establishes the need for new development to take account of the sensitivity of change to landscape character areas. Planning applications for those sites which are located within the identified Areas of Special Landscape Quality will be subject to a higher level of assessment.
- 6.4 As noted above, it is unclear what role, if any the Strategic Gaps will have under the new Local Plan. As such, in respect of assessing the acceptability in principle of different development sites outside the settlement boundaries within the countryside, we would expect that those within the Identified Areas of Special Landscape Quality will broadly be considered more sensitive than those outside them (e.g. Land at Newgate Lane).

7. CONCLUSION

- 7.1 These representations to the Local Plan Issues and Options Consultation Supplement documents on behalf of Fareham Land LP and Bargate Homes Ltd. in respect of Land at Newgate Lane, and should be read in conjunction with our previous representations.
- 7.2 Whilst we support the identification of the need for additional housing growth areas/allocations to meet Fareham's housing requirement, we question the process by which those areas and sites have been assessed and selected. Growth within the Strategic Gap is a good thing, but locations should be chosen to maintain its integrity.
- 7.3 Land at Newgate Lane is a sustainably located site, within an area of low landscape sensitivity, and it has been proven through planning applications that there are no overriding technical constraints to development (in contrast to other untested sites). We consider that the exclusion of the site from the SHELAA on the basis that it would be at odds with the settlement pattern of Peel Common is unjustified and fails to take into account the wider landscape considerations.
- 7.4 For this reason, we recommend that the Land at Newgate Lane should be favourably considered for allocation in the Council's Local Plan.

APPENDIX 1

SITE LOCATION PLAN



KEY: SITE LOCATION PLAN

○ APPLICATION BOUNDARY
10.02 HA

LAND ADJACENT TO NEWGATE LANE, FAREHAM - COMPOSITE SITE LOCATION PLAN



APPENDIX 2

SUMMARY OF SHELAA SITES WITHIN THE FAREHAM- STUBBINGTON GAP

Ref.	Site Area	Accessibility Rating	Highways/ Access	PROW	Agricultural Land Grade	Solent Brent Geese and Wader	Flood Zone (any part)	Mineral	Other	Suitability Comment
1040	13.7	7/10	Traffic impact yet to be assessed	Y	2	Low Use	1, 2	Y	TPOs, Noise assessment required	The site is within the proposed Strategic Growth Area which identifies the land between Fareham and Stubbington as a potential area for future growth. Growth in this area should be appropriately master planned taking into account the range of issues including Brent Geese and Waders and noise impact of the new Stubbington Bypass, and seeking opportunities in terms of community benefits.
1341	19.3	4/10	New highways solution required as Oakcroft Lane/ Ranvilles Lane is unsuitable	Y	2, 3b	Secondary Support Area, Low Use	1, 2, 3	Y		
3008	110.3	8/10	TBC via masterplanning	Y	2	Secondary Support Area, Low Use		Y	Air and noise assessment required	
3059	36.0	1/10	Proposed access arrangements appear acceptable	Y	2	Low Use	1, 2, 3	Y	Within 500m of SPA, Within 500m of Ramsar, Within 500m of SSSI	
3198	5.2	4/10	TBC via masterplanning	Y	2	N/A	1	Y	Oxleys Coppice SINC and Ancient Woodland form eastern boundary of the site.	
3199	23.6	5/10	TBC via masterplanning	Y	2	Low Use	1, 2	Y		
3200	12.0	3/10	TBC via masterplanning	Y	2	Low Use	1, 2	Y		
3201	15.4	5/10	TBC via masterplanning	Y	2, 3a, 3b	N/A	1	Y	Brick works adjacent, old filter beds on site	
3129	5.8	N/A	Proposed access via Newgate Lane with improvement works to Newgate Lane/Newgate Lane Relief Road T junction	N	3a/3b	Low Use	1, 2, 3	Y	Chamomile identified	
3161	4.2	N/A		N	3a/3b	Low Use	1, 2, 3	Y	Chamomile identified	

APPENDIX 9

SUSTAINABILITY APPRAISAL SUPPORTING THE LOCAL PLAN SUPPLEMENT



URBAN EDGE
ENVIRONMENTAL
CONSULTING

NATURAL PROGRESSION

Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Local Plan 2036

Interim Sustainability Report

January 2020

Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Local Plan 2036

Interim Sustainability Report

Client:	Fareham Borough Council	
Report No.:	UE0192 SEA- Fareham LPR Interim Sustainability Report_2_200107	
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Abbreviations

ALC	Agricultural Land Class
AQMA	Air Quality Management Area
BMV	Best and Most Versatile (Agricultural Land)
CEMP	Construction Environmental Management Plan
CCMA	Coastal Change Management Area
EclA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
FBC	Fareham Borough Council
GIS	Geographic Information System
HLA	High Level Assessment
LCA	Landscape Character Area
LNR	Local Nature Reserve
SAC	Special Areas of Conservation
SEA	Strategic Environmental Assessment
SA	Sustainability Appraisal
SHELAA	Strategic Housing & Employment Land Availability Assessment
SINC	Site of Importance to Nature Conservation
SGA	Strategic Growth Area
(p)SPA	(Potential) Special Protection Area
SPZ	(Groundwater) Source Protection Zone
SSSI	Site of Special Scientific Interest

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1 Introduction

1.1 The Fareham Borough Local Plan 2036

1.1.1 Currently the development plan for Fareham Borough is comprised of the following documents:

- ▶ Local Plan Part 1: Core Strategy (adopted August 2011);
- ▶ Local Plan Part 2: Development Sites and Policies (DSP) Plan (adopted June 2015);
- ▶ Local Plan Part 3: The Welborne Plan (adopted June 2015); and
- ▶ Hampshire Minerals and Waste Plan (adopted October 2013).

1.1.2 The new Local Plan will set the planning strategy for the Borough and address emerging housing and employment needs for a period of 16 years up to 2036. The Welborne Plan will not be replaced by the 2036 Plan, but together with the new Local Plan will form the new Development Plan for the Borough.

1.1.3 A Draft version of the new Local Plan was published for Regulation 18 consultation between 25 October and 8 December 2017. The Draft Plan was accompanied by a Sustainability Report which formed part of the Draft Plan evidence base. In 2018, the Government published changes to the National Planning Policy Framework (NPPF), which significantly increased the number of homes required in Fareham Borough. The Draft Local Plan which Fareham Borough Council (FBC) consulted on in 2017 would not meet the new requirement hence triggering the need for a new Local Plan.

1.1.4 In the summer of 2019, FBC undertook an Issues and Options consultation which included eight potential areas for growth, considering all greenfield areas across the Borough, see Figure 1.1. FBC has used the responses to help formulate the revised Development Strategy for the new Local Plan, including new sites to meet the additional housing need. FBC has now published a Regulation 18 document as a supplement to the Draft Local Plan that was consulted upon in 2017 and setting out the detail of the revised Development Strategy; it aligns with the vision and objectives of the 2017 Draft Local Plan.

1.1.5 The Regulation 18 Supplement document will be subject to a six-week consultation period. The revised Development Strategy, new sites and policies within the consultation document will be combined with the 2017 version of the Draft Local Plan, as amended following its consultation. The resulting Publication Plan will then be produced, and that document will be subject to a further six-week period of consultation (Regulation 19).

1.2 Purpose of this Report

- 1.2.1 This interim Sustainability Report has been prepared for FBC as part of the combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process for the Fareham Local Plan 2036.
- 1.2.2 The Draft Local Plan was accompanied by a full Sustainability Report¹ which formed part of the Draft Plan evidence base. That Sustainability Report was in compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and Environmental Assessment of Plans and Programmes Regulations 2004. It incorporated the Environmental Report which is required in accordance with EU Directive 2001/42/EC on Environmental Assessment of Plans and Programmes (the SEA Directive). A further iteration of the full Sustainability Report will be produced as part of the Publication Plan evidence base.
- 1.2.3 This report provides an assessment of the additional policies and site allocations included in the Regulation 18 Supplement consultation document which were not included in the 2017 Draft Plan and hence were not considered within the 2017 Sustainability Report. This report also includes a High-Level Assessment (HLA) of eight potential areas for growth as presented in the Issues and Options consultation undertaken in summer 2019, which form reasonable alternatives to the Plan as proposed. The findings of this assessment have been used to inform the Strategic Growth Area (SGA) policy in the Regulation 18 Supplement consultation document.
- 1.2.4 This report is accompanied by a Site Options Assessment Report² which presents the results of the HLA of all potential sites listed in FBC Strategic Housing & Employment Land Availability Assessment (SHELAA). This includes all the development allocations proposed by policies in the 2017 Draft Plan and those additional site allocations set out in the Regulation 18 Supplement consultation document.

¹ UEEC (2017). *Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Borough Local Plan 2036: Sustainability Report for the Local Plan, October 2017.*

Available at: https://www.fareham.gov.uk/PDF/planning/local_plan/DraftLocalPlanEvidenceBase/EV02-SEA_Fareham_LPR_Draft_Plan_5_171024.pdf

² UEEC (2020). *Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Local Plan Review: Site Options Assessment Report, January 2020.*

PLANNING FROM NOW UNTIL 2036



Figure 1.1: Potential Areas of Growth from Issues & Options Consultation

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2 Methodology

2.1 Approach to the Assessment

2.1.1 The additional policies and site allocations included in the Regulation 18 Supplement consultation document were assessed against the SA Framework using a three-stage process.

Spatial site assessment (sites only)

2.1.2 Each potential site allocation was assessed against a range of spatial constraints data to ensure consistency in approach and robustness in site selection. The assessments examined the suitability of each site according to its relative accessibility, previous uses and potential for contamination, landscape or ecological impact, loss of agricultural land, flood risk, and proximity to sources of, or sensitive receptors to pollution. A range of designated features were also addressed, including nearby heritage assets, important landscapes and nature conservation sites. The assessment was carried out in ArcGIS 10.7 using several separate geo-environmental datasets (as listed in Table 2.1 and Appendix III of the Site Options Assessment report³).

High-level assessment

2.1.3 Drawing on the results of the spatial site assessment, the main function of the HLA is to identify whether or not plan options are likely to bring positive, negative or uncertain effects in relation to the SA Objectives (section 2.3). A benefit of this approach is that a high number of plan options, including both sites and policies, can be assessed and easily compared in terms of their likely sustainability performance, and can then be scrutinised in further detail if a significant number of uncertainties or potential negative effects arise. Options are given a score against each SA Objective ranging from Strong Positive, Positive or Neutral, to Negative, Strong Negative or Mixed/Uncertain. This helps identify at a strategic level which options will require a more detailed examination or whether satisfactory conclusions may be drawn from the HLA, without the need for further detailed assessment.

Detailed assessment

2.1.4 Where potential negative effects or uncertainties are identified through the HLA in association with a particular policy or site, a secondary level of assessment is undertaken to examine the proposal in more detail. This process uses Detailed Assessment Matrices to scrutinise potential negative or uncertain effects identified by the HLA.

³ Ibid

2.2 High Level Assessment of Potential Areas of Growth

- 2.2.1 Each of the eight potential areas of growth identified in the summer 2019 Issues and Options consultation has also been subject to a spatial site assessment against the same geo-environmental constraints data as for the potential site allocations. Drawing on the results of the spatial constraints assessment, a HLA of each area against the SA Framework has been carried out.
- 2.2.2 Within each area, there are a number of SHELAA sites. For each area the assessment has, where possible, sought to differentiate between the potential effects of locations where there are sites considered in the SHELAA and the potential effects of development on the remaining land within the areas. An appraisal of each of these individual SHELAA sites in sustainability terms is presented with the Site Options Assessment Report⁴.

2.3 The Sustainability Appraisal Framework

- 2.3.1 The purpose of the SA Framework is to provide a means of ensuring that the Local Plan considers the sustainability needs of the area in terms of its social, environmental and economic effects. It enables the sustainability effects of the plan to be described, analysed and compared.
- 2.3.2 The SA Framework consists of sustainability objectives which, where practicable, can be expressed in the form of targets, the achievement of which is measurable using indicators. There is no statutory basis for setting objectives but they are a recognised way of considering the sustainability effects of a plan and comparing alternatives, and as such provide the basis from which effects of the plan can be tested consistently.
- 2.3.3 The SA Objectives were derived through consideration of the Policies, Plans and Programmes (PPP) review, the baseline data collection, and the key sustainability issues identified for the plan area as set out in the SEA Scoping Report⁵. Alongside these, the SEA environmental receptors identified in Annex I (f) of the SEA Directive were a key determinant when considering which SA Objectives should be used for appraisal purposes. The objectives address the social and economic requirements of SA, while also retaining a high degree of relevance to SEA. The SA Objectives seek to reflect each of these influences to ensure the assessment process is robust, balanced and comprehensive.
- 2.3.4 Table 2.1 lists the SA Objectives, while the full SA Framework of objectives and decision-making criteria is given at Appendix I.

⁴ *Ibid*

⁵ UEEC (2016). *Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Local Plan Review: Scoping Report, February 2016*. Available at: https://www.fareham.gov.uk/PDF/planning/local_plan/SEAFarehamLPRScoping.pdf

Table 2.1: SA Objectives

#	Objective
1	To provide good quality and sustainable housing for all
2	To conserve and enhance built and cultural heritage
3	To conserve and enhance the character of the landscape
4	To promote accessibility and encourage travel by sustainable means
5	To minimise carbon emissions and promote adaptation to climate change
6	To minimise air, water, light and noise pollution
7	To conserve and enhance biodiversity
8	To conserve and manage natural resources (water, land, minerals, agricultural land, materials)
9	To strengthen the local economy and provide accessible jobs available to residents of the borough
10	To enhance the vitality and viability of centres and respect the settlement hierarchy
11	To create a healthy and safe community

2.4 Limitations to the Assessment

2.4.1 It is acknowledged that there are a number of limitations and difficulties surrounding the SA process, predominantly stemming from the nature of strategic assessment at the plan level, using secondary data. These limitations often lead to assessment conclusions being based on professional judgement rather than empirical fact, informed by the best available data and experience of the assessor, together with contributions by statutory consultation bodies and other interested parties. These limitations, and any further limitations identified during later assessment stages, are stated to ensure that judgements based on professional opinion are clearly identified.

Implementation of the Local Plan

2.4.2 The sustainability effects of the Local Plan will largely be dependent on how the plan is implemented. The plan provides a broad picture of the location and type of new development, while setting standards for factors such as design and infrastructure provision. How the developments perform in sustainability terms is very much dependent on what happens at the micro-scale. For example if new development does not comply with the aspirations presented in the plan (for example related to water or energy efficiency, viability, infrastructure

requirements and affordable housing) then the positive effects highlighted under the policies addressing these topics will be reduced. In another example, the effect on resource use of new development proposed through the plan will depend on the exact nature of how new houses, offices, shops and community facilities are designed and built, the layout of development, and the actions of the people who will live and work there. It is therefore noted that the sustainability performance of the plan will be dependent on the implementation of the policies and strategic allocations in particular.

High Level Assessment of Potential Areas of Growth

- 2.4.3 The potential areas of growth as presented in the summer 2019 Issues and Options consultation are not demarcated by defined spatial boundaries and therefore the assessments presented in this report are indicative only, and based on professional judgement. They are intended to guide the decision-making process in terms of which broad, undeveloped areas within the Borough have the capacity to accommodate further development whilst minimising adverse sustainability effects and maximising opportunities for beneficial sustainability effects.
- 2.4.4 There is a large degree of spatial variation in terms of predicted environmental effects across some of the potential areas of growth and therefore, as described in section 2.2.2, the assessment has sought to differentiate between areas where there are SHELAA sites and potential effects associated with development on the remaining areas land where possible.
- 2.4.5 Scoring for SA Objectives 1 (Housing) and 9 (Economy) has been informed by estimated dwelling and employment floorspace yields for SHELAA sites within the area of growth. Scoring has been undertaken on a comparative basis, comparing the potential contribution of any one potential area of growth towards housing / employment against other potential areas of growth rather than against any quantitative criteria.

3 Assessment of New Draft Plan Policies and New Site Allocations

3.1 Introduction

- 3.1.1 The HLA findings for the new policies included in the Regulation 18 Supplement consultation document are included in Appendix II. This section of the Interim SA Report provides a summary of these findings. Overall, none of the new policies result in any significant negative effects for any of the SA Objectives.
- 3.1.2 The HLA findings for the four new site allocations included in the Regulation 18 Supplement consultation document are included in the Site Options Assessment Report⁶ and are also summarised below.

3.2 High-Level Assessment Findings

- 3.2.1 New Housing Policies including 'New Small-Scale Development outside defined urban areas', 'Internal Space Standards' and 'Five-Year Housing Land Supply' are predicted to be largely neutral in sustainability terms. New policies relating to trees, woodland and hedgerows, flood risk and sustainable drainage climate change and air quality are all predicted to have further positive environmental effects.
- 3.2.2 There are four new Housing Allocations included in the Regulation 18 Supplement consultation document, in addition to those set out in the 2017 Draft Plan. These include SHELAA sites 0046, 0086 and 3204, as well as site 2843 (Land South of Cams Alders) which is allocated for Sheltered Housing. The sustainability effects of these sites are considered as part of the Site Options Assessment Report⁷. Detailed assessments were prepared as part of the 2017 Sustainability Report⁸ for site allocations with potentially significant environmental or socio-economic effects. A detailed assessment for site 0046 has been undertaken on the same basis and is provided in Appendix III as this site was considered to have potentially significant environmental effects in relation to SA Objective 8 (Natural Resources). Detailed assessments were not prepared for sites 0086, 2843 and 3204 because the HLA did not predict any significant environmental effects for these sites.

⁶ UEEC (2020). *Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Local Plan Review: Site Options Assessment Report*, January 2020

⁷ *Ibid*

⁸ UEEC (2017). *Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Borough Local Plan 2036: Sustainability Report for the Local Plan*, October 2017.

Available at: https://www.fareham.gov.uk/PDF/planning/local_plan/DraftLocalPlanEvidenceBase/EV02-SEA_Fareham_LPR_Draft_Plan_5_171024.pdf

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4 Assessment of Potential Areas of Growth

4.1 Introduction

4.1.1 The Issues and Options consultation undertaken in summer 2019 presented eight locations where greenfield development could potentially be accommodated to meet future demands for housing beyond 2036 (Figure 1.1). There is also potential for these areas to help deliver unmet need from neighbouring authorities should that be deemed necessary following the ongoing work with the Partnership for South Hampshire. Descriptions of these eight areas are provided in Table 4.1. The full results of the HLA of these areas set out in Table 4.2.

Table 4.1: Strategic Growth Area Descriptions

Strategic Growth Area	Description
Land around Burridge	This area is located in the north-west of the Borough, north of the M27. To the west and north-west, the area is bounded by the River Hamble and to the east by Botley Road. This section of the River Hamble forms part of the Solent Maritime SAC, Solent & Southampton Water SPA / Ramsar and the Solent & Dorset Coast pSPA. The Upper Hamble Estuary and Botley Woods SSSI also lies immediately to the north-west. The western and central portions of the area are dominated by Swanwick Wood and Nature Reserve, designated as ancient woodland, lowland mixed deciduous woodland priority habitat and SINC. The eastern and north-eastern sections of the area contain existing residential properties in Burridge and Swanwick. Known opportunities for development are concentrated around these existing residential areas.
Land around of Swanwick Station	This area is located in the north-west of the Borough covering the area of land between Lower Swanwick and Swanwick station, north of the A27. The M27 runs through the centre of the area in an approximate east-west direction. On both sides of the M27 the landscape is punctuated with small areas of woodlands, many of which are designated as lowland mixed deciduous woodland priority habitat, including Lower Swanwick woodlands SINC to the south of the M27. Residential properties exist in the south-east of the area north of the A27 in Sarisbury / Locks Heath and along Swanwick Lane. SHELAA sites are predominantly located across the central and eastern portions of the area
Land west of Western Wards	This area is located on the south-western edge of the Borough, running west of Warsash in the south to Lower Swanwick in the north and including Universal Marina. To the west, the area is bounded by the River Hamble which is designated as the Solent Maritime SAC, Solent & Southampton Water SPA / Ramsar, Solent & Dorset Coast pSPA and Lee-on-the-Solent to Itchen Estuary SSSI. The southern portion of the area is predominantly existing residential development in Warsash and Sarisbury Green, whilst the remaining sections, the central portion in particular, are

Strategic Growth Area	Description
	<p>punctuated with areas of woodland, the majority of which are designated as lowland mixed deciduous woodland and wet woodland priority habitat. Known opportunities for development are concentrated along the eastern edge of the area.</p>
<p>Land south of Locks Heath</p>	<p>This area is located in the south of the Borough. The area is bound to the north and west by the urban settlement of Locks Heath, to the south by the Solent and to the east by the Meon Valley. The area is currently predominantly in agricultural use. The Solent Maritime SAC, Solent & Southampton Water SPA / Ramsar and Lee-on-the-Solent to Itchen Estuary SSSI extend into the area in its south-west corner. Across the area, but particularly in the south and west, there are large pockets of woodland the majority of which are designated as lowland mixed deciduous woodland and wet woodland priority habitat. Known opportunities for development are located in the north-west of the area.</p>
<p>Land between Fareham and Stubbington</p>	<p>This area is located towards the south-east of the Borough in the strip of land which separates the urban areas of Fareham to the north, Stubbington to the south and Gosport to the east. The area extends to Newgate Lane in the east and to the B334 in the south-east. The area is predominantly in agricultural use, with small with pockets of priority habitat. Peel Common sewage treatment works and Newlands solar farm are located in the south-east. The Stubbington Bypass is proposed through the centre of the area connecting to B3334 Titchfield Road in the west and the B3334 Gosport Road in the south-west. SHELAA sites in this area are spread across most of the land area with the exception of the sewage works and the solar farm.</p>
<p>Land around Welborne Garden Village</p>	<p>This area is located to the east of the Welborne Garden Village boundary, east of the A32 Wickham Road and north of the M27 junction 11. The land is predominantly in agricultural use. Wallington River flows through the centre of the area in a north-south direction. There are areas of woodland in the north of the area designated as SINC, ancient woodland and lowland mixed deciduous woodland priority habitat. There is a corridor of coastal and floodplain grazing marsh priority habitat following the river channel. SHELAA sites are restricted to the southern end of the area, south of Nine Elms Lane.</p>
<p>Land west of Porchester</p>	<p>This area is located between Fareham and Porchester with the M27 to the north and the Portsmouth Harbour waterbodies to the south and south-west. The A27 runs through the centre of the area in an east-west orientation. The land immediately north and south of the A27 is in existing residential use, with the land in the north separated from adjacent farmland by the Porchester to Fareham railway line. The Cams Hall Estate golf club occupies the south-west corner of the area, much of which is also designated as coastal and floodplain grazing marsh priority habitat. Portsmouth Harbour, immediately to the south / south-west is designated as a SPA / Ramsar / pSPA / SSSI. Land in the north of the area between existing residential areas and the M27 is predominantly agricultural. SHELAA sites are predominantly north of the A27 but with some limited</p>

Strategic Growth Area	Description
	sites also available for residential development in the south.
Meon Valley	<p>The Meon Valley runs through the centre of the Borough with the River Meon at its heart. To the east this area is bound by the settlements of Fareham and Hill Head / Stubbington, and to the west by Locks Heath and agricultural land south of Locks Heath. The area extends as far north as the M27 and as far south as the Solent. The Solent here is designated as an SPA / Ramsar / pSPA and SSSI. The SPA / Ramsar and SSSI designations continue into the south of the area itself along the Meon corridor. This portion of the Meon corridor also forms the Titchfield Haven National (and Local) Nature Reserve, with many sections of the river corridor further north designated as SINC. Much of the river corridor is also designated for priority habitats, including coastal and floodplain grazing marsh, lowland mixed deciduous woodland, wet woodland and reedbeds. SHELAA sites are focussed in the central and northern sections of the area.</p>

4.2 High-Level Assessment Findings

- 4.2.1 The potential areas of growth cover large areas of land and hence there is a high degree of spatial variation in terms of predicted environmental effects. There are a range of positive, negative and neutral effects across the 11 SA Objectives predicted for development in the eight areas as set out in Table 4.2. However overall, 'Land South of Locks Heath', 'Fareham to Stubbington', 'Land west of Porchester' and 'Meon Valley' provide the best opportunity for strong positive effects in terms of provision of housing (SA Objective 1).
- 4.2.2 Development in six of the eight potential areas of growth is predicted to result in adverse landscape effects (SA Objective 3), with the exception of 'Land west of Porchester' and 'Land around Swanwick Station' where on the whole the landscape character is less sensitive to development, although there are still areas where development could impact negatively and any proposals would need to be carefully designed to protect and enhance the character and quality of landscape resources, views and visual amenity. Strong adverse landscape effects are predicted for development in the 'Meon Valley' as the landscape here is considered to be one of the most distinctive and important landscape resources within the Borough.
- 4.2.3 There are a number of ecologically designated sites in and around the Borough, particularly around the Solent. 'Land south of Locks Heath' and 'Meon Valley' are broadly considered to be the most ecologically sensitive potential areas of growth (SA Objective 7). The Solent's European designated sites extend into 'Land south of Locks Heath' and 'Meon Valley', although SHELAA sites are largely located away from these most sensitive areas. 'Land between Fareham and Stubbington' does not contain any European designated sites but large areas of agricultural land identified for potential development are designated of importance for Brent Goose and Wader species, albeit predominantly sites categorised as having 'Low Use' within

the 2019 Brent Goose and Wader Strategy⁹. 'Low Use' sites have the potential to be used by waders or brent geese and have the potential to support the existing network and provide alternative options and resilience for the future network¹⁰. In the remaining five areas, ecological effects are predicted to be mixed with any loss of priority habitat resulting in locally adverse effects. All development should seek to avoid losses of priority habitat or impacts to nature conservation sites.

- 4.2.4 The greenfield nature of the potential areas of growth means that predicted environmental effects in terms of loss of natural resources (SA Objective 8), including agricultural land and mineral deposits, are adverse for all areas except for 'Land west of Western Wards'. Much of the greenfield land within the Borough is categorised as Best and Most Versatile (BMV) agricultural land and mineral deposits extend across much of this area. Project proposals should seek to preserve areas of high quality agricultural land wherever possible and extract minerals prior to construction, subject to suitability assessment, to minimise impacts as far as possible.
- 4.2.5 There are a range of positive, negative and neutral effects across the remaining SA Objectives for the eight potential areas of growth but overall it is considered that 'Land west of Porchester' is the most sustainable greenfield location at the high-level stage. Detailed assessments have been prepared for the two SGAs proposed in the Regulation 18 Supplement consultation document: North of Downend SGA which corresponds to 'Land west of Porchester' and South of Fareham SGA which corresponds to 'Fareham to Stubbington'. These are provided within Appendix III.

⁹ Whitfield (2019). *Solent Waders and Brent Goose Strategy 2019 Interim Project Report: Year One*. Hampshire and Isle of Wight Wildlife Trust. Curdridge

¹⁰ *Ibid*

Table 4.2: High Level Assessment of Potential Areas of Growth

SA Objective	Commentary
-	Land around BurrIDGE
1 Housing	Positive effects are predicted over the medium to long term as SHELAA sites within this area have the capacity to accommodate residential development which will make a significant contribution to the overall housing requirement in the Borough.
2 Heritage	There is just one listed building within the area itself at BurrIDGE Farm, although there is a cluster of listed buildings to the south-east beyond the area boundary. SHELAA sites in the south-eastern corner of the area could impact on the setting of these features in the short and long term, with the overall effects dependent on the scale of construction works and the scale, massing and design of development. The protected wreck of the Grace Dieu is located on the western boundary of the area; any development in close proximity to this asset could result in localised adverse heritage effects in the short and long term. But overall, development in this area would have largely neutral heritage effects as there are relatively few heritage sensitivities.
3 Landscape	The area falls within Landscape Character Area (LCA) 1: Upper Hamble Valley to the west and LCA 13: BurrIDGE - Swanwick - Whiteley to the east. Most SHELAA sites are located in LCA 13 which has mostly moderate development potential as it is an area of urban fringe rather than an area of countryside. Adverse effects are predicted for development in the east of the area in the short and long term, although the nature of these effects will be dependent on the scale, massing and design of development. In comparison, the majority of LCA 1, to the west of the area, has low development potential along the upper reaches of the tidal River Hamble and the woodlands to the east; development here would result in strong adverse effects to landscape character in the short and long term. Overall, development in this area is predicted to result in adverse effects to landscape character.
4 Accessibility	The urban fringe nature of this area results in lower accessibility compared with other area, with relatively few facilities within reasonable walking distance. SHELAA sites are concentrated in the east of the area; here mixed effects are predicted for development towards the south and south-east as the ability to encourage travel by sustainable means will be dependent on transport infrastructure which accompanies development in this location; development located towards the north-east of the area is predicted to result in adverse effects. Any development further west is predicted to have strong adverse effects resulting from poor accessibility further from existing urban areas.
5 Climate Change	The majority of the area, including the eastern side where there are SHELAA sites, does not fall within an area of flood risk, and therefore development is not expected to increase flood risk on site or downstream. Overall, positive effects are predicted over the short and long term. However, areas of flood zone 2 and 3 do extend into the western extremities of the area along the banks of the River Hamble. Any development here is predicted to result in strong adverse effects, as these areas also experience poor accessibility.
6 Pollution	Predominantly positive effects are predicted as there are no Air Quality Management Areas (AQMAs) or Groundwater Source Protection Zones (SPZ) within the area and the majority of the area is not within 100m of the M27 which serves as a major source of noise, light and air pollution for residential receptors. There is a historic landfill site in the centre of the area but given that this was located on the site of what is now Swanwick Nature Reserve, development

SA Objective	Commentary
	here is unlikely. Any development in the vicinity of this area will require specific layout and design measures to mitigate any potential contamination effects.
7 Biodiversity	This area has significant biodiversity interest, particularly in the west. The River Hamble runs along the west / north-western boundary and this section of the river forms part of the Solent Maritime Special Area Conservation (SAC), Solent & Southampton Water Special Protection Area (SPA) / Ramsar and the Solent & Dorset Coast potential Special Protection Area (pSPA). The Upper Hamble Estuary and Botley Woods Site of Special Scientific Interest (SSSI) also lies immediately to the north-west. The western and central portions of the area are dominated by Swanwick Wood and Nature Reserve, designated as ancient woodland, lowland mixed deciduous woodland priority habitat and Site of Importance for Nature Conservation (SINC). Any direct habitat loss from these areas from development would result in strong adverse ecological effects, especially in the north-east, where tributaries of the River Hamble, forming part of the SAC / SPA / Ramsar, run into the area. SHELAA sites are concentrated towards the east of the area where there are fewer ecological constraints and therefore mixed effects are predicted. All development should seek to avoid losses of priority habitat or impacts to the adjacent nature conservation sites.
8 Natural Resources	The area is predominantly Agricultural Land Classification (ALC) Grade 4 agricultural land with a pocket of ALC Grade 3 in the south-east and some ALC Grade 1 towards the north-west. The western and northern sections of the area are safeguarded for minerals, with River Terrace deposits following the River Hamble corridor. Therefore effects of development will be spatially specific for this objective. Development in the east, where SHELAA sites occur, are predicted to result in adverse effects, but development further west is expected to result in strong adverse effects as there is risk of mineral sterilisation in addition to loss of agricultural land (including ALC Grade 1). Project proposals will need to demonstrate how land of greatest agricultural value can be preserved and consider whether minerals can be extracted prior to construction, subject to suitability assessment.
9 Economy & Jobs	SHELAA sites in this area are not expected to include any employment land use and therefore neutral effects are predicted, although short term positive effects via local employment and purchasing during the construction stages are possible.
10 Vitality of Centres	Largely neutral effects are anticipated as SHELAA sites in this area are not predicted to compete with existing or proposed centres.
11 Health	Positive effects are predicted for development in the south-east of the area, where SHELAA sites occur, given the proximity to several areas of existing, publically accessible open space. The effects of development further north in the area are not expected to be so positive although some areas of existing open spaces are still accessible.
-	Land around Swanwick Station
1 Housing	Positive effects are predicted over the medium to long term as SHELAA sites within this area have the capacity to accommodate residential development which will make a significant contribution to the overall housing requirement in the Borough.
2 Heritage	There are a number of listed buildings within the area, predominantly clustered in the north-east corner around Friend's Farm, Morgan's Farm and Rookery Farm. There is a secondary cluster at Glen House towards the centre of the area. The Sarisbury Green conservation area sits on the southern boundary of the area. Any direct impacts to these listed structures would have adverse heritage effects. Development in proximity to these clusters and the conservation

SA Objective	Commentary
	area could impact on the setting of these features in the short and long term, with the overall effects dependent on the scale of construction works and the scale, massing and design of development. Elsewhere in the area, development is predicted to have neutral heritage effects.
3 Landscape	South of the M27, the rural parts of the area fall within LCA 14: North Sarisbury. This area has moderate development potential and therefore development here is predicted to have adverse effects to landscape character. North of the M27 the eastern portion of the area falls within LCA 13: Burr ridge - Swanwick - Whiteley, which has high development potential in this locality, therefore positive effects to landscape character are predicted. A small portion of the area in the north-west falls within LCAs 1 & 2: Upper and Lower Hamble Valley, with low to moderate development potential respectively. Development here is predicted to have adverse effects to landscape character.
4 Accessibility	Development in the east of the area and close to existing urban areas would have relatively good accessibility with a good number of facilities within reasonable walking distance; therefore positive effects are predicted. Development further west in the area, particularly in the north-west, would have poorer accessibility with fewer opportunities to encourage sustainable travel resulting in adverse effects.
5 Climate Change	There is a small area of flood zone in the south-west of the area around Swanwick Marina. The rest of the area does not fall within a flood zone. Given the relatively good accessibility to facilities in the east of the area where the majority of SHELAA sites occur, positive effects are predicted here over the short and long term. Further west, accessibility levels decline and therefore effects are uncertain.
6 Pollution	The M27 is a major source of air, light and noise and pollution for residential receptors and development within 100m of the motorway is predicted to result in adverse effects for new residents introduced into these areas. Otherwise there are no known constraints to development within this area, including AQMAs or SPZs, and therefore away from the M27 positive effects are predicted. Overall, effects are mixed for this area.
7 Biodiversity	The rural parts of this area are punctuated with small areas of woodlands, many of which are designated as lowland mixed deciduous woodland priority habitat, including Lower Swanwick woodlands SINCC to the south of the M27 and Swanwick Nature Reserve in the north-west corner. Development in close proximity to these areas is predicted to have uncertain ecological effects, as the nature of any impacts will be dependent on the scale of development, the ability to retain habitat areas within proposals and other ecological mitigation measures which are adopted. Direct losses of priority habitat will result in adverse ecological effects. All development should seek to avoid losses of priority habitat or impacts to the adjacent nature conservation sites.
8 Natural Resources	The majority of the area is classified as ALC Grade 2 agricultural land with an area of ALC Grade 1 in the north-east corner and a strip of ALC Grade 4 along the western boundary. ALC Grades 1 and 2 are considered BMV agricultural land and development in these areas will result in adverse effects due to loss of agricultural resource. There are no mineral resources within the area with the exception of a small section of River Terrace deposits in the north-west corner. However, the north-eastern portion of the area is a safeguarded minerals processing site and therefore development in this area could impact on mineral processing operations resulting in adverse effects. Overall, adverse effects are predicted in terms of natural resources for this area with some spatial variability. Project proposals will need to demonstrate how land of greatest agricultural value can be preserved and consider whether minerals can be extracted prior to construction, subject to suitability assessment.
9 Economy & Jobs	SHELAA sites in this area are not expected to include any employment land use and therefore neutral effects are predicted, although short term positive

SA Objective	Commentary
	effects via local employment and purchasing during the construction stages are possible.
10 Vitality of Centres	Largely neutral effects are anticipated as SHELAA sites in this area are not predicted to compete with existing or proposed centres.
11 Health	In general, positive effects are predicted north of the M27 where most of the area is within 300m of at least two existing, publically accessible open spaces or allotments. South of the M27 and north of Sarisbury more adverse effects are predicted as fewer open spaces are located within a 300m radius.
-	Land West of Western Wards
1 Housing	Known residential development opportunities are limited in this area and therefore, in comparison with other area, adverse effects are predicted as there is minimal capacity to contribute to the Borough's overall housing requirement.
2 Heritage	There is a cluster of listed buildings around Brooklands in the north of the area and a second cluster in Warsash along Shore Road. Warsash Maritime Academy is also located in the south of the area. The Sarisbury Green conservation area sits just to the north-east of the area boundary. Any direct impacts to these listed structures would have adverse heritage effects. Development in proximity to these clusters and the conservation area could impact on the setting of these features in the short and long term, with the overall effects dependent on the scale of construction works and the scale, massing and design of development. Elsewhere in the area, development is predicted to have neutral heritage effects.
3 Landscape	The majority of the area forms part of LCA 2: Lower Hamble Valley. In the southern most portions of the area this LCA has low development potential on account of the high sensitivity of the landscape resulting from large open areas, such as Strawberry Field, with a strong visual relationship with the adjacent high quality river landscape. Development here could result in significant adverse effects to landscape character, although the nature of these effects will be dependent on the scale, massing and design of development. A small area around Brook Avenue has high development potential given that the character and quality of the landscape has already been affected by urban influences. Development in this locality is predicted to have positive effects. The remainder of the area is considered to be of moderate development potential, and development here is predicted to give rise to adverse effects to landscape character.
4 Accessibility	Given the length of this area, accessibility varies greatly across the area. Accessibility is best around Warsash and Sarisbury given the proximity to facilities in those areas. Here positive effects are predicted as the number of facilities within reasonable walking distance is likely to encourage sustainable travel methods. Further south around Warsash Maritime Academy, and around Brook Avenue, accessibility levels are relatively poor and therefore effects are uncertain and will be dependent on transport infrastructure which accompanies development in this location.
5 Climate Change	The western edges and southern sections of the area fall within flood zone 2 and 3 given the proximity of the River Hamble. The southernmost section also falls within the Hook Spit to Workmans Lane Coastal Change Management Area (CCMA). Known opportunities for development are predominantly located on the east of the area away from the flood risk zones and the CCMA, and therefore are not expected to increase flood risk. Positive effects are predicted over the short and long term, increasing to strong positive effects in areas of good accessibility where carbon emissions are expected to be comparatively lower due to sustainable travel modes. However, development further west and south, in areas of flood zone, would result in more adverse effects.

SA Objective	Commentary
6 Pollution	The area does not fall within 100m of the M27 which is a major source of air, light and noise pollution for residential receptors. Similarly there are no AQMAs or Ground Protection Zones in the area and therefore strong positive effects are predicted with respect to pollution.
7 Biodiversity	To the west, the area is bounded by the River Hamble which is designated as the Solent Maritime SAC, Solent & Southampton Water SPA / Ramsar, Solent & Dorset Coast pSPA and Lee-on-the-Solent to Itchen Estuary SSSI. There are large areas of priority habitat across the area, including coastal and floodplain grazing marsh, intertidal mudflats, reedbeds, saline lagoons and coastal saltmarsh along the western boundary and in the south, and lowland mixed deciduous woodland, wet woodland, wood pasture and parkland across the central and northern areas. A number of ancient woodlands and Local Nature Reserves (LNRs) run through the area including the Winnard & Cawte's Copses, Hook-with-Warsash, Brook Wood, Brooklands Wood and Downkilk Cope. Development in close proximity to these areas is predicted to have uncertain ecological effects, as the nature of any impacts will be dependent on the scale of development, the ability to retain habitat areas within proposals and other ecological mitigation measures which are adopted. Direct losses of priority habitat will result in adverse ecological effects. All development should seek to avoid losses of priority habitat or impacts to the adjacent nature conservation sites.
8 Natural Resources	In general terms, the northern half of the area is ALC Grade 4 agricultural land and the southern half is ALC Urban. There is a small area of land in the centre of the area around Brook Avenue which has been subject to land survey post 1988. This shows pockets of Grade 3b and Grade 4 agricultural land in this area. Large portions of the area contain River Terrace deposits, although these are mostly in the west. Development in existing urban areas on the edge of Sarisbury Green, which does not fall within these deposits, is predicted to result in positive effects; however, development in areas of classified agricultural land and where river deposits are known to be present are predicted to result in adverse effects due to loss and / or sterilisation of these resources. Project proposals will need to demonstrate how land of greatest agricultural value can be preserved and consider whether minerals can be extracted prior to construction, subject to suitability assessment.
9 Economy & Jobs	SHELAA sites in this area are not expected to include any employment land use and therefore neutral effects are predicted, although short term positive effects via local employment and purchasing during the construction stages are possible.
10 Vitality of Centres	Largely neutral effects are anticipated as SHELAA sites in this area are not predicted to compete with existing or proposed centres.
11 Health	Positive effects are predicted where SHELAA sites occur as these areas are within 300m of at least two existing, publically accessible open spaces or allotments, including Hollyhill Woodland Park. There are localised areas where more adverse effects are predicted as fewer open spaces are located within a 300m radius, but overall effects are expected to be positive.
-	Land south of Locks Heath
1 Housing	Strong positive effects are predicted over the medium to long term as SHELAA sites in this area have the capacity to accommodate high levels of residential development which will make a significant contribution to the overall housing requirement in the Borough.

SA Objective	Commentary
2 Heritage	There are numerous listed buildings and archaeology alerts ¹¹ throughout the area clustered around existing farm properties, including in Hook, which is also designated as a conservation area. SHELAA sites in this area are broadly located around Hook. Here, any direct impacts to listed structures would have adverse heritage effects. Development in proximity to these clusters and the conservation area could impact on their setting in the short and long term, with the overall effects dependent on the scale of construction works and the scale, massing and design of development. Elsewhere in the area, heritage effects are expected to be largely neutral, although direct and indirect heritage effects could result in proximity to heritage assets.
3 Landscape	The north-western portion of this area, where the majority of development opportunities are situated, falls within LCA 3: Hook Valley. Development potential in this area is low as the landscape contains a range of valued landscape, ecological and heritage features and its natural unspoilt qualities means that it is highly susceptible to built development. Development here is predicted to result in strong adverse effects to landscape character. The rest of the area falls within LCA 4: Brownwich Coastal Plain. Development potential here is moderate and construction would be predicted to also have adverse effects to landscape character, although not as severe as for LCA 3.
4 Accessibility	Accessibility in this area is poor with relatively few facilities within reasonable walking distance, particularly in and around Hook. Overall adverse effects are predicted for the area with strong adverse effects in and around Hook. Any development in this area should seek to encourage travel by sustainable means.
5 Climate Change	The south-west corner and western boundary of the area fall with flood risk zones. There is also a strip of flood zone running north and south from Brownwich Pond towards the east of the area. The southern and western boundary portions of the area also fall within the Hook Spit to Workmans Lane CCMA, an area likely to be affected by physical changes to the coast. A few SHELAA sites west of Hook fall within the flood zone and CCMA and effects here are predicted to be strong adverse. The majority of the known opportunities for development avoid these areas, but the associated predicted effects in these areas are mixed on account of poor accessibility potentially resulting in higher carbon emissions. This is also the case for the rest of the area outside of the CCMA and flood zones.
6 Pollution	There are a number of historic landfill sites around Hook. Where development site boundaries overlap with these historic landfills there is potential for contamination effects in the short term during construction, and adverse effects are predicted. Any development in this vicinity will require specific layout and design measures to mitigate any potential contamination effects. Elsewhere positive effects are predicted as the area does not contain any Groundwater Protection Zones or AQMAs and the M27, a major noise, air and light pollution source, is not located within 100m of any part of the area.
7 Biodiversity	The Solent Maritime SAC, Solent & Southampton Water SPA / Ramsar and Lee-on-the-Solent to Itchen Estuary SSSI extend into the area in its south-west corner. There are also areas of importance for Brent Goose and Wader in the southern sections, including areas designated as 'Core' and 'Secondary Support' Areas by the 2019 Brent Goose Wader Strategy. There are large areas of priority habitat across the area, but particularly in the south-west, including coastal and floodplain grazing marsh, lowland meadows, lowland mixed deciduous woodland, wet woodland and wood pasture and parkland. A

¹¹ Archaeology Alerts are areas of archaeological potential defined by Hampshire County Council: Red alerts designate 'Scheduled Ancient Monuments'; Orange alerts designate 'areas of national interest'; Yellow alerts designate 'locally important monuments of known extent'; and Green alerts designate to 'locally important monuments of unknown extent'.

SA Objective	Commentary
	number of Local Nature Reserves (LNRs) and SINC's are located in the southern and western portions of the area. Some of these are also designated for ancient woodland although these are located away from SHELAA sites. Development in the south-west of the area could lead to direct habitat loss from significant portions of these designated areas with strong adverse ecological effects. Development in close proximity to these areas is predicted to have uncertain ecological effects, as the nature of any impacts will be dependent on the scale of development, the ability to retain habitat areas within proposals and other ecological mitigation measures which are adopted. All development should seek to avoid losses of priority habitat or impacts to the adjacent nature conservation sites.
8 Natural Resources	The northern and western sections of the area, where SHELAA sites occur, are designated as ALC Grade 4 and ALC Non-Agricultural land. Further south and east there are sections of ALC Grade 2 and 3 agricultural land. The majority of the area is also underlain by River Terrace mineral deposits which could be sterilised if not extracted prior to development. Adverse effects are predicted across the majority of the area, including where SHELAA sites occur on account of the potential loss of agricultural land and sterilisation of mineral resource. Project proposals will need to demonstrate how land of greatest agricultural value can be preserved and consider whether minerals can be extracted prior to construction, subject to suitability assessment.
9 Economy & Jobs	SHELAA sites in this area are not expected to include any employment land use and therefore neutral effects are predicted, although short term positive effects via local employment and purchasing during the construction stages are possible.
10 Vitality of Centres	Largely neutral effects are anticipated as SHELAA sites in this area are not predicted to compete with existing or proposed centres.
11 Health	Strong positive effects are predicted where SHELAA sites occur as there are numerous existing open spaces in the vicinity of the west of the area which would be accessible for new residents. However, proposed development in Hook itself could result in the direct loss of Hook Lane existing open space which is predicted to have strong adverse effects at the local scale. Further east in the area, adverse effects are also predicted as there are fewer open spaces readily accessible further from existing built up areas.
-	Land between Fareham and Stubbington
1 Housing	Strong positive effects are predicted over the medium to long term as the SHELAA sites within this area have the capacity to accommodate very high levels of residential development which will make a significant contribution to the overall housing requirement in the Borough.
2 Heritage	SHELAA sites are spread across the area. There are few listed buildings in the area, solely along Newgate Lane. Fort Fareham scheduled monument is located beyond the area boundary to the north-east. There are yellow and green archaeology alerts located in the centre of the area around Newlands Farm. Heritage effects are likely to be concentrated in these areas. In the short-term, construction works around Newlands could impact on buried archaeological assets and in the medium to long term development along Newgate Lane could impact on the setting of listed structures. Localised adverse effects are predicted. Elsewhere in the area, neutral heritage effects are predicted.
3 Landscape	The area is almost completely within LCA 7: Fareham - Stubbington Gap. For all but the south eastern corner of the area the landscape type is open coastal plain and development potential here is moderate given the open, expansive landscape. The introduction of the Stubbington Bypass will impact the rural

SA Objective	Commentary
	character of the area introducing activity and noise into the agricultural landscape. Development here is predicted to result in adverse effects to landscape character. Around the sewage works and solar farm in the south-east corner, the landscape is considered to be of lower value on account of the utilities which have completely altered the character of the immediate area, although they are relatively well-screened by wooded bunds and planting.
4 Accessibility	Accessibility varies greatly across the area, with a greater number of facilities within reasonable walking distance in those areas closest to existing urban settlements. Mixed effects are therefore predicted with development towards the centre of the area more likely to result in adverse effects. Any development in this area should seek to encourage travel by sustainable means.
5 Climate Change	Small areas of the area fall within flood risk zones along the northern fringe of Stubbington. Development in this area could increase flood risk on site and downstream. The varied accessibility levels across the area mean that opportunities to reduce carbon emission through sustainable transport means also vary. Overall, mixed effects are predicted.
6 Pollution	Strong positive effects are predicted across the area with regard to pollution effects. The area is located over 100m from the M27 which is a major source of noise, light and air pollution for residential receptors; there are also no Groundwater Protection Zones or historic landfill sites in the vicinity and therefore contamination effects are unlikely.
7 Biodiversity	Large swathes of the agricultural land within the area are of importance for Brent Goose and Wader. The majority are categorised as 'Low Use' in line with the 2019 Brent Goose Wader Strategy but there are two 'Secondary Support Areas' either side of Peak Lane. There are small pockets of priority habitat across the area, including lowland mixed deciduous woodland (also designated as ancient woodland and SINCS), coastal and floodplain grazing marsh and lowland meadows. Adverse ecological effects are predicted due to likely direct habitat loss from these Brent Goose Wader sites. All development should seek to avoid losses of priority habitat or impacts to the adjacent nature conservation sites.
8 Natural Resources	The majority of the area is ALC Grade 2 agricultural land which is considered BMV. There is a small pocket south of Newlands Farm which has been subject to agricultural land survey post 1988 where the land is categorised as ALC Grade 3b and 'Other'. There is a band of 'Construction Sand' mineral deposits running through the centre of the area and pockets of River Terrace deposits in the south-west and south-east corners. Development across the majority of the area would result in loss of agricultural land with adverse effects; where mineral deposits are also at risk of sterilisation these effects would be strong adverse. Project proposals will need to demonstrate how land of greatest agricultural value can be preserved and consider whether minerals can be extracted prior to construction, subject to suitability assessment.
9 Economy & Jobs	SHELAA sites in this SGA are not expected to include any employment land use and therefore neutral effects are predicted, although short term positive effects via local employment and purchasing during the construction stages are possible.
10 Vitality of Centres	Largely neutral effects are anticipated as SHELAA sites in this area are not predicted to compete with existing or proposed centres.
11 Health	There are a number of small, existing open spaces around the urban fringes. New residents at developments across the majority of the area would be able to access at least two open spaces within 300m. Positive effects are predicted, although any direct loss of existing open spaces would result in strong

SA Objective	Commentary
	adverse effects and development proposals should seek to avoid any losses as part of the development design.
-	Land around Welborne Garden Village
1 Housing	Known residential development opportunities are limited in this area and therefore, in comparison with other areas, adverse effects are predicted as there is minimal capacity to contribute to the Borough's overall housing requirement.
2 Heritage	There are a few listed buildings scattered across the area around existing farm properties. There are green and yellow archaeology alerts north of Boarhunt Road, and in the south-east of the area at Monument Farm there is a WWII anti-aircraft gunsite designated as a scheduled monument and a red archaeology alert. SHELAA sites between Boarhunt Road and Nine Elms Lane are likely to have direct impacts to heritage assets with adverse effects. SHELAA sites south of Boarhunt Road could impact on the setting of heritage assets in the short and long term, with the overall effects dependent on the scale of construction works and the scale, massing and design of development. Any other development north of Nine Elms Lane would have largely neutral heritage effects, so long as these avoid impacts to listed structures at Whitedell Farm and Spurlings Farm.
3 Landscape	<p>The area lies across three LCAs, including LCA 10: Forest of Bere in the north, LCA 9: North Fareham Downs in the centre and down towards the south-western corner and LCA 11: Portsdown. SHELAA sites primarily fall within LCA 11 which is open arable downs sloping westwards from the highest point in the east near Monument Farm down to the Wallington River floodplain in the west. This LCA has moderate development potential on account of its open, expansive character and characteristic tree cover which would make development difficult to integrate. Overall, in this portion of the area where SHELAA sites occur adverse effects to landscape character are predicted.</p> <p>Any development in LCA 10 in the northernmost section of the area is predicted result in strong adverse effects as development potential here is low. Development in the central and western sections of the area in LCA 9 is predicted to result in adverse effects, increasing to strong adverse for development in the Wallington River Valley.</p>
4 Accessibility	Accessibility is poor across this area with relatively few facilities within a reasonable walking distance, and hence few opportunities for sustainable modes of travel. Therefore adverse effects are predicted.
5 Climate Change	The Wallington River corridor running through the area is an area of flood risk. SHELAA sites south of Nine Elms Lane which avoid the flood zones are predicted to result in mixed effects taking account of potential for increased carbon emissions due to the poor accessibility of the location. Any development north of Nine Elms Lane which avoids the Wallington corridor flood zones would similarly result in mixed effects. However, any development within the area which falls wholly or partially within the flood zone could increase the risk of flooding onsite or downstream and therefore adverse effects are predicted.
6 Pollution	The southern portion of the area, where SHELAA sites occur, is within 100m of the M27 which is a major source of noise, air and light pollution for residential receptors. The majority of the area also falls within a SPZ, with SPZ 1 towards the south of the area and therefore there is a risk of contamination during construction works in this area.

SA Objective	Commentary
	Strong adverse effects are predicted for SHELAA sites given the proximity to the M27 and the SPZ designation. Noise, air and light pollution effects will impact on residential receptors as oppose to employment land users. Further north effects associated with noise, air and light pollution will be reduced however contamination risks still exist and therefore effects are still predicted to be adverse within the SPZ designated area.
7 Biodiversity	There are areas of woodland in the north of the area designated as SINCs, ancient woodland and lowland mixed deciduous woodland priority habitat. There is a corridor of coastal and floodplain grazing marsh priority habitat following the river channel. SHELAA sites in the south of the area which avoid any loss of priority habitat are predicted to have neutral ecological effects. This would also be the case further north, although any direct loss of priority habitat is predicted to have adverse ecological effects.
8 Natural Resources	The majority of the area is ALC Grade 2 agricultural land with a band of ALC Grade 3 at the northern end. River Terrace mineral deposits also underlay a large portion of the area including the south-western section. SHELAA sites would result in the loss of ALC Grade 2 agricultural land with adverse effects. In the south-west of the area, these opportunities could also result in the sterilisation of mineral resource resulting in strong adverse effects. Any development further north is also predicted to result in adverse effect due to the loss of agricultural resource and sterilisation of mineral deposits. Where the agricultural land is BMV these effects could be strong adverse. Project proposals will need to demonstrate how land of greatest agricultural value can be preserved and consider whether minerals can be extracted prior to construction, subject to suitability assessment.
9 Economy & Jobs	Significant employment floorspace is proposed within the SHELAA sites in this area which would result in strong positive effects.
10 Vitality of Centres	Largely neutral effects are anticipated as SHELAA sites in this area are not predicted to compete with existing or proposed centres.
11 Health	There are relatively few open spaces in the vicinity of this area. New residents across the areas are predicted to be able to access fewer than two open spaces within 300m and therefore adverse effects are predicted.
-	Land west of Porchester
1 Housing	Strong positive effects are predicted over the medium to long term as SHELAA sites within the area have the capacity to accommodate high levels of residential development which will make a significant contribution to the overall housing requirement in the Borough.
2 Heritage	There are several listed buildings in this area, clustered in and around the Cams Hall Estate in the south-west, which forms part of the Cams Hill conservation area, and along Cams Hill. There are also some yellow and green archaeology alerts in the area. SHELAA sites are predominantly located to the north of the A27 where there are few heritage assets and therefore heritage effects here are predicted to be neutral. There are a few SHELAA sites in the south-east of the area and effects here are similarly predicted to be neutral. There are limited SHELAA sites in the south-west around the Cams Hill Estate, but development here is predicted to have adverse effects on the setting of listed structures and the conservation area, with the magnitude of impact dependent on the scale of construction works and the scale, massing and design of development.
3 Landscape	North of the A27 and the existing residential area, where most SHELAA sites are concentrated, forms part of LCA 11: Portsdown; the landscape character

SA Objective	Commentary
	<p>here is mostly open arable downs of fringe character. The Downend Chalk Pit SSSI sits in the centre of this area. Overall this landscape is of relatively low sensitivity given the modification of the landscape and intrusive features such as overhead power lines, urban development and the motorway, although the middle and upper slopes are visible in the far distance from over 1km to the south.</p> <p>South of the A27 and the existing residential area, the landscape forms part of LCA 12: Cams - Wicor coastal plain. Development potential in the west is low as the landscape here is parklands and grounds forming the Cams Hill conservation area. Development in this area would result in strong adverse effects to landscape character. LCA 12 also extends into the south-east of the area. Here, close to the urban fringes there is higher development potential, but closer to the coast there is a diverse, amenity landscape which is considered highly sensitive to change. Overall, development in LCA 12 is predicted to result in adverse effects.</p>
4 Accessibility	<p>Accessibility in the area is generally good, although areas further from the urban fringes have fewer facilities within a reasonable walking distance. Overall, mixed effects are predicted across the area in terms of encouraging travel by sustainable means.</p>
5 Climate Change	<p>There are pockets of flood zone along the southern, coastal fringes of the area; any development within these areas could increase flood risk on site or downstream. The majority of SHELAA sites would not fall within the flood zone. For this reason, in combination with the relatively good accessibility in the area resulting in comparatively fewer carbon emissions, effects are predicted to be positive. However, any development within the flood zone would result in adverse effects.</p>
6 Pollution	<p>The M27 forms the northern boundary of the area and is a major source of noise, air and light pollution for residential receptors. There are also a number of historic landfill sites on both the northern and southern sides of the existing residential development running across the centre of the area; therefore there is potential for contamination effects in the short term during construction. The far north-western corner of the area falls within SPZs 1 and 2, and therefore there is also a risk of groundwater contamination during construction in this area.</p> <p>SHELAA sites in the north of the area are predicted to result in adverse effects, with strong adverse effects in very close proximity to the M27 and within the SPZs. Any development in this vicinity will require specific layout and design measures to mitigate any potential contamination effects.</p> <p>Development south of the area is predicted to have less adverse effects in pollution terms, given the greater distance to the M27 and SPZs.</p>
7 Biodiversity	<p>Portsmouth Harbour, immediately to the south / south-west of the area, is designated as a SPA / Ramsar / pSPA / SSSI. The Downend Chalk Pit SSSI is also located in the north-centre of the area. The Cams Hall Estate in the south-west corner of the area is largely designated as coastal and floodplain grazing marsh priority habitat. There are other areas of priority habitat, namely lowland mixed deciduous woodland, in the south and west of the area and along the Porchester to Fareham railway line. Large areas of land in the south-east of the area are designated as importance for Brent Goose Wader in line with the 2019 Brent Goose Wader Strategy, including a 'Primary Support' area. Mixed effects are predicted in this area. SHELAA sites in the north directly impacting the Downend Chalk Pit SSSI would result in strong adverse effects; other development north of the A27 would be largely neutral in terms of ecology.</p> <p>SHELAA sites in the south-east of the area resulting in land take from the sites of importance for Brent Goose Wader, particularly the 'Primary Support' areas, would result in adverse effects. Sites here in close proximity to Portsmouth Harbour could also impact on the habitats and species in this area,</p>

SA Objective	Commentary
	<p>dependent on the nature and scale of development coming forward.</p> <p>Any development coming forward in the south-west of the spatial is likely to result in the direct loss of priority habitat with adverse effects and could also indirectly impact on the designations within Portsmouth Harbour.</p> <p>All development should seek to avoid losses of priority habitat or impacts to the adjacent nature conservation sites.</p>
8 Natural Resources	<p>North and south of the existing residential areas along the A27, the land is classified as ALC Grade 2 and 3. Portions in the east have been subject to survey post 1988 and are classified as ALC Grade 2, 3a and 3b with a small portion of ALC Grade 1 around Wicor primary school. There are minerals deposits in the south and south-west of the area which could be sterilised if not extracted prior to development. The area around Downend Chalk Pit is a safeguarded waste processing/waste transfer station.</p> <p>Given these constraints, development across the area, including SHELAA sites, is predicted to result in adverse effects in terms of natural resources. Project proposals will need to demonstrate how land of greatest agricultural value can be preserved and consider whether minerals can be extracted prior to construction, subject to suitability assessment.</p>
9 Economy & Jobs	<p>Limited employment floorspace is proposed within the SHELAA sites in this area which would result in positive effects.</p>
10 Vitality of Centres	<p>Largely neutral effects are anticipated as SHELAA sites in this area are not predicted to compete with existing or proposed centres.</p>
11 Health	<p>There are several existing open spaces across the area predominantly located around the urban fringes. New residents at developments across the majority of the area, including SHELAA sites, would be able to access at least two open spaces within 300m. Positive effects are predicted, although any direct loss of existing open spaces would result in strong adverse effects and development proposals should seek to avoid any losses as part of the development design.</p>
-	Meon Valley
1 Housing	<p>Strong positive effects are predicted over the medium to long term as SHELAA sites in this area have the capacity to accommodate high levels of residential development which will make a significant contribution to the overall housing requirement in the Borough.</p>
2 Heritage	<p>There are numerous listed buildings across the area but with a large cluster in the Titchfield conservation area and another around Titchfield Abbey which is also a scheduled monument and has a conservation area designation. These clusters also have a number of associated archaeology alerts.</p> <p>The majority of the SHELAA sites in this area are located in and around the conservation areas. Development within these conservation areas could impact on the setting of the areas themselves but also the settings of listed buildings, archaeological assets and the scheduled monument, although the nature of the effect will be dependent on the scale, layout and design of the proposals. Direct impacts to buried archaeological assets here are also possible in the short-term during construction works.</p> <p>There are no SHELAA sites in the south of the area, but any development in this location is likely to have neutral heritage effects, although there is potential</p>

SA Objective	Commentary
	for some adverse impacts to the setting of scattered listed structures.
3 Landscape	The majority of the area falls within LCA 6: Meon Valley. There are small sections which fall within LCAs 4 and 5 in the west and LCA 7 in the east, but for the most part the area forms part of the landscape valley and its open and enclosed valley sides and floodplain. In general, development potential is low on account of the rural, intact landscape based around the diverse landscape features of the valley and the strong relationship between the valley floor and the gently sloping agricultural landscape beyond. It is considered to be one of the most distinctive and important landscape resources within the Borough; therefore strong adverse landscape effects are predicted across the area.
4 Accessibility	Accessibility in the central and northern parts of this area where SHELAA sites occur is considered to be good with a relatively high number of facilities within reasonable walking distance in the nearby urban settlements. Positive effects are predicted here with good potential for travel by sustainable means. Further south, accessibility is predicted to be poorer with the exception of locations close to existing urban areas. Here adverse effects are predicted.
5 Climate Change	<p>A large section of flood zone 2 and 3 runs down the centre of the area following the river valley. Development in this zone could lead to increased flood risk on site and downstream.</p> <p>Most SHELAA sites in this area avoid the flood zone, and together with the relatively good accessibility of the area resulting in comparatively fewer carbon emissions, overall effects are predicted to be positive in the central and northern parts of the area. There are localised exceptions where some SHELAA sites fall partially within the flood zone. For these sites, effects are predicted to be adverse.</p> <p>Further south, the flood zone occupies a larger portion of the area towards the east. Any development in the flood zone is predicted to result in adverse effects.</p>
6 Pollution	The M27, which is a major source of noise, air and light pollution for residential receptors, crosses the northern-most section of the area, but the majority of the area is more than 100m from the motorway. There are no groundwater protection zones or historic landfill sites within the area and therefore the potential for contamination effects is considered to be low. Overall, strong positive effects with respect to pollution are predicted across the area, including or SHELAA sites.
7 Biodiversity	<p>The Meon Valley is an ecologically sensitive landscape. The Solent, immediately to the south of the area, is designated as the Solent and Southampton Water SPA / Ramsar, the Solent and Dorset Coast pSPA and Titchfield Haven SSSI, sections of which all continue into the south of the area itself along the Meon corridor. This portion of the Meon corridor also forms the Titchfield Haven National (and Local) Nature Reserve, with many sections of the river corridor further north designated as SINC. Much of the river corridor is also designated for priority habitats, including coastal and floodplain grazing marsh, lowland mixed deciduous woodland, wet woodland and reedbeds. The majority of the southern half of the area is of importance for Brent Goose and Wader' in line with the 2019 Brent Goose Wader Strategy, including several 'Primary' and 'Secondary' support areas.</p> <p>SHELAA sites in the central and northern sections of the area are predicted to result in mixed effects, as a number of sites could result in the direct loss of priority habitats, SINC and Brent Goose Wader sites with more adverse effects.</p> <p>Given the sensitivity of the area in the south, any development coming forward here is predicted to have strong adverse ecological effects.</p>

SA Objective	Commentary
8 Natural Resources	The vast majority of the area is designated as ALC agricultural land, varying from Grades 1 to 4. Small areas have been subject to agricultural survey post 1988 and were found to be ALC Grade 2 to 3b. There are also large swathes of River Terrace mineral deposits across the majority of the area which could be sterilised if not extracted prior to development. Given these constraints, development in this area, including SHELAA sites, is predicted to result in adverse effects in terms of natural resources. Project proposals will need to demonstrate how land of greatest agricultural value can be preserved and consider whether minerals can be extracted prior to construction, subject to suitability assessment.
9 Economy & Jobs	SHELAA sites in this area are not expected to include any employment land use and therefore neutral effects are predicted, although short term positive effects via local employment and purchasing during the construction stages are possible.
10 Vitality of Centres	Largely neutral effects are anticipated as SHELAA sites in this area are not predicted to compete with existing or proposed centres.
11 Health	There are numerous areas of existing open space around the central and northern portions of the area where SHELAA sites are focussed. Therefore, new residents at developments would be able to access at least two open spaces within 300m. Positive effects are predicted, although any direct loss of existing open spaces would result in strong adverse effects and development proposals should seek to avoid any losses as part of the development design. Any development further south is predicted to result in more adverse effects as there are fewer existing open spaces in this area.

5 Summary and Next Steps

- 5.1.1 This report accompanies the Regulation 18 Supplement consultation document setting out new policies and site allocations to the 2017 Draft Fareham Local Plan, generated in response to changes to the NPPF which significantly increase the number of homes required in Fareham Borough.
- 5.1.2 This interim Sustainability Report presents the findings of the high-level assessment of these new policies and site allocations against the SA Framework, including an assessment of the eight potential areas of growth put forward in the summer 2019 Issues and Options Consultation.
- 5.1.3 This report should be read in conjunction with the Site Options Assessment report¹² which assesses each of the individual potential sites from the FBC SHELAA in sustainability terms.
- 5.1.4 Overall the new policies will not result in any significant adverse environmental effects, and some of the new policies are predicted to have significant positive environmental effects. Of the four new Housing Allocations included in the Regulation 18 Supplement consultation document, sites 0046, 0086, 2843 and 3204, only site 0046 was considered to have potentially significant environmental effects and therefore has been subject to further detailed assessment.
- 5.1.5 At this high-level stage, the 'Land west of Porchester' potential area of growth is considered to be the most sustainable greenfield location to accommodate future demands for housing beyond 2036.
- 5.1.6 A further iteration of the full Sustainability Report, in compliance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and Environmental Assessment of Plans and Programmes Regulations 2004, will be produced as part of the Publication Plan evidence base.

¹² UEEC (2020). *Sustainability Appraisal and Strategic Environmental Assessment for the Fareham Local Plan Review: Site Options Assessment Report, January 2020.*

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NATURAL PROGRESSION

APPENDIX 10

CORRESPONDENCE WITH THE LPA ON CHAMOMILE AND BAP PRIORITY HABITAT

Jane Gardiner

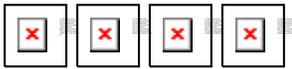
From: Chambers, Jean <JChambers@Fareham.Gov.UK>
Sent: 05 December 2019 08:46
To: Jim Phillips
Cc: Kate Holden; Miri, Maral; Charlie Fayers
Subject: RE: Newgate Lane South- Ecology P/19/0460/OA

Dear Mr Phillips

Thank you for the email and the points that you have raised. I will consider further in due course when I am working on the file and committee report.

Yours sincerely

Jean Chambers
Principal Planner (Development Management)
Fareham Borough Council
01329824355
07774946032



From: Jim Phillips <jim.phillips@ethosep.co.uk>
Sent: 20 November 2019 16:20
To: Chambers, Jean <JChambers@Fareham.Gov.UK>
Cc: Kate Holden <Kate.Holden@pegasusgroup.co.uk>; Miri, Maral <Maral.Miri@hants.gov.uk>; Charlie Fayers <charlie.fayers@ethosep.co.uk>
Subject: RE: Newgate Lane South- Ecology P/19/0460/OA

Hi Jean

Kate Holden has forwarded me your email below which there appears to be two main issues you have raised:

1. The requirement for upfront surveys should appropriately cover the habitat value in order to inform potential mitigation;
2. The ability to understand the value of the habitat it surely would be unclear as to how the proposed open space could/would function, i.e. can it be appropriately managed and still function as an open space.

In response to these points, I make the following comments:

We have completed surveys of this land in September and October 2019 and established the presence of chamomile (which is included as a species “of principal importance for the purpose of conserving biodiversity” under Section 41 (England) of the Natural Environment and Rural Communities Act 2006), and other plant species indicating the fields would meet the criteria of a lowland meadow (which is a UK BAP Priority Habitat). It has not been feasible to complete a full NVC survey of the habitat due to its existing use for horse grazing (which is intensive) and presents a significant limitation to this.

The evidence we have to date is sufficient to establish the value of the habitat (which we have) and provides us with sufficient information to prepare management objectives for the land to ensure it can function as both open space and retain its value as a BAP habitat and habitat for chamomile. Indeed, considering the existing heavy poaching of the site from grazing, its proposed use, with appropriate management will significantly increase the opportunity for this habitat to be improved resulting in a biodiversity net gain.

The requirement for upfront NVC surveys in this circumstance is unreasonable and has no legislative requirement as current government standing advice only requires upfront surveys for protected sites and species – this habitat and site is not included on this list (<https://www.gov.uk/guidance/protected-sites-and-areas-how-to-review-planning-applications#types-of-protected-sites-and-areas>).

In my view, it would be reasonable and proportional to accept a management plan based on the evidence we have to date, and then condition a detailed landscape and ecological management plan (LEMP) for this area and the whole site for a reserved matters application. At this outline stage, you only need to establish that the habitat can be retained and managed appropriately – which it can. This approach would enable a detailed botanical survey (NVC) to be completed when grazing ceases and this would be used along with other detail design matters to prepare the detailed LEMP. This is standard practice and I have worked on many hundreds of projects where this has been acceptable. I see no reasonable justification why this approach would not be acceptable for this scheme.

I would hope that my suggestion above would enable you to reconsider your statement below.

Thanks

Jim Philips
Managing Director



Ecology | Green Space | Community | GIS

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From: Chambers, Jean <JChambers@Fareham.Gov.UK>

Sent: 15 November 2019 12:21

To: Kate Holden <Kate.Holden@pegasusgroup.co.uk>

Cc: Miri, Maral <Maral.Miri@hants.gov.uk>

Subject: RE: Newgate Lane South- Ecology P/19/0460/OA

Kate

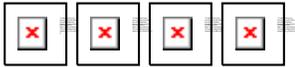
Thank you for the email. You will be aware of my overall concern on this application. With regard to the potential for a planning condition in respect of the issues raised below, my advice is that as with any application, upfront surveys should appropriately cover the habitat value in order to inform potential mitigation. Until we understand the value of the habitat it surely would be unclear as to how the proposed open space could/would function, i.e. can it be appropriately managed and still function

as an open space? This could then have implications in whether the up to figure of 115 units could be accommodated.

At this point in time, I consider there to be insufficient information to inform the application.

I hope this helps.

Jean Chambers
Principal Planner (Development Management)
Fareham Borough Council
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From: Kate Holden <Kate.Holden@pegasusgroup.co.uk>
Sent: 07 November 2019 14:30
To: Chambers, Jean <JChambers@Fareham.Gov.UK>
Cc: maral.miri@hants.gov.uk; Charlie Fayers <charlie.fayers@ethosep.co.uk>
Subject: Newgate Lane - Ecology

Jean,

Our ecologist has had a helpful discussion with Maral on the phone regarding the latest ecology comments.

The chamomile survey revealed a presence of the plant on the western part of the site, which is proposed for public open space. I understand that Maral is agreeable to a planning condition which will require the approval of a Management Plan to retain and manage the chamomile as appropriate.

However, it is now also alleged that the same western part of the site *may* also be a Priority Habitat (meadow), and that unfortunately we cannot know this conclusively until a survey is carried out in the relevant seasons beginning in April/May. As such, we have suggested a further condition to undertake the survey work (NVC survey) at the appropriate time and if necessary, produce a similar Management Plan.

I understand that the LPA is reluctant to condition the Priority Habitat work, being of the opinion that the application cannot be determined without this information? I note that policy that policy CS4 which deals with biodiversity makes clear that all important habitats should be accorded protection (albeit in line with the hierarchy of sites set out – which does not include Priority Habitats). It goes on to state that *“Green Infrastructure will be created and safeguarded through: Investing in appropriate management, enhancement and restoration, and the creation of new resources including parks, woodland and trees, and wildlife habitats; Not permitting development that compromises its integrity and therefore that of the overall green infrastructure framework.”* Given that the proposal does not include the development of the part of the site which may be Priority Habitat, and therefore we know that appropriate management is achievable, I fail to see why a condition would not be an appropriate response to adhere to the policy?

Maral has suggested you may be able to throw some more light on this, and I would be grateful for your thoughts.

Regards,

Kate.

Kate Holden
Associate Planner

Pegasus Group

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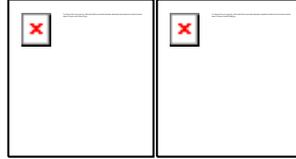
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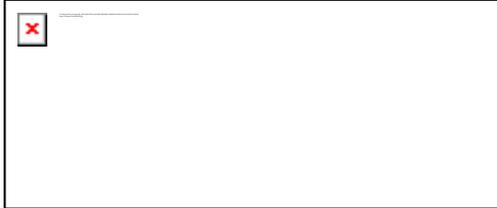
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APPENDIX 11
ECOLOGY OFFICER RESPONSE

Subject:

P/19/0460/OA - Land at Newgate Lane (South) Fareham

Subject: P/19/0460/OA - Land at Newgate Lane (South) Fareham

Dear Jean,

P/19/0460/OA - Land at Newgate Lane (South) Fareham - Outline Planning Permission For The Demolition Of Existing Buildings And Development Of Up To 125 Dwellings, Open Space, Vehicular Access Point From Newgate Lane And Associated And Ancillary Infrastructure, With All Matters Except Access To Be Reserved.

Thank you for consulting me on this planning application which is supported by an Ecological Assessment by ethos Environmental Planning (April 2019).

The habitats present on site include boundary hedgerows, scattered trees, improved grassland, arable fields and buildings. The River Alver runs through the western side of the site, along with a number of drainage ditches along the field boundaries. The suit of surveys carried out on the site confirmed the likely absence of badger setts, great crested newts, otters and water voles. Reptiles are likely to be present on site; however, the suitable habitats for this group of species, along the river Alver, will be retained and enhanced. The bat activity surveys recorded low levels of foraging and commuting activity of common and soprano pipistrelle, Nathusius's pipistrelle, noctule, Leisler's and brown long-eared bats. The breeding bird surveys recorded a total of 29 bird species, including four red-listed and UK BAP and a number of declining farmland species. Of these, 21 were exhibiting breeding behaviours and were assessed to hold territories within the survey area.

The proposed mitigation and enhancement measures are broadly acceptable and include retention and enhancement of boundary hedgerows, creation of swales and wildflower meadows, creation of log piles, retention of darkened corridors and installation of bird and bat boxes. Therefore, I raise no major concerns. However, I request further information in relation to Hedge 3 which accounted for the majority of Nathusius's pipistrelle calls. This hedge is assessed as being a key commuting route for bats across the site. Whilst this hedge will be retained, review of the illustrative masterplan fails to show if any buffers will be retained/created to the north and south of this hedge. Therefore, further clarification in relation to the width of buffers, if any, is required

The application site is located approximately 2.3km north-east of the Solent & Southampton Water SPA and Ramsar and Solent and Dorset Coast pSPA and 1.3km south-west of Portsmouth Harbour SPA and Ramsar. In the absence of mitigation, a number of Likely Significant Effects (LSEs) are expected and therefore, it is necessary to proceed to the Appropriate Assessment stage. The following LSEs have been identified in relation to the above designated sites:

- Loss of SPA supportive habitat
- Increased Recreational Disturbance
- Hydrological changes from surface water
- Hydrological changes from foul water

The site is known to be a Solent Waders and a Brent Geese Strategy 'Low Use' (F15) site. It is evident that avoidance, mitigation and compensation measures to offset the loss of this habitat cannot be provided. Therefore, a payment towards the management and enhancement of the wider wader and Brent geese ecological network will be required. The level of financial contribution will be decided by Natural England and should be secured through a S106.

The increased recreational disturbance will be mitigated through the Solent Recreation Mitigation Strategy financial contribution, which should be secured through a S106.

The surface water equality changes and an increased flood risk as a result of the proposals will be mitigated through the implementation of the SuDS scheme and a CEMP during the construction phase.

Waste water from the development is likely to add to the nitrogen levels within the Solent and Southampton Water and Portsmouth Harbour. The pathway is via the waste water treatment works. There is potential for all new developments within the Solent catchment to impact on the nutrient levels in the harbours. Therefore, a nitrogen budget calculation for the site will be required. Provided that the calculations confirm nitrogen neutrality or a deficit in the budget, then no impacts are considered likely.

Considering the above, it could be concluded that there will be no adverse effect on the integrity of the Portsmouth Harbour SPA and Ramsar Site, the Solent and Dorset Coast pSPA and the Solent and Southampton Water SPA and Ramsar, provided that the measures summarised above are put in place. More details could be found within the officer's Habitat Regulation Assessment report.

If you were minded to grant permission (provided that the nitrogen budget calculations are acceptable and the buffer to the north and south of Hedge 3 is appropriate), I recommend that the below conditions are added to the decision notice:

- The dark corridors as illustrated by Figure 14 'Biodiversity Mitigation Plan' of the submitted Ecological Assessment by ethos Environmental Planning (April 2019) shall be implemented and retained for perpetuity. **Reason:** to protect key commuting routes for bats in line with Policy DSP13.
- Full details of all necessary ecological mitigation, compensation, enhancement and management measures (to be informed as necessary by up-to-date survey and assessment) shall be submitted for approval to the Local Planning Authority in the form of a mitigation and enhancement method statement with each reserved matters application. Such details shall be in accordance with the outline ecological mitigation, compensation and enhancement measures detailed within the submitted Ecological Assessment report by Ethos Environmental Planning (April 2019). Any such approved measures shall thereafter be implemented in strict accordance with the agreed details and with all measures maintained in perpetuity, unless otherwise agreed in writing by the Local Planning Authority. **Reason:** to provide ecological protection, compensation and enhancement in accordance with Conservation Regulations 2017, Wildlife & Countryside Act 1981 (as amended), NERC Act 2006, NPPF and Policy DSP13 of the Fareham Local Plan Part 2.

Please do not hesitate to contact me if you need any further information.

Kind regards,
Maral

Please note that this advice is given in accordance with the Service Level Agreement that has been signed between Hampshire County Council and your Council. These comments are expressed as a professional view provided to Fareham Borough Council and should not, therefore, be interpreted as those of Hampshire County Council.

Maral Miri (MSc, CEnv, MCIEEM)

Senior Ecologist

Ecology Team

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APPENDIX 12

SHADOW HRA



Land at Newgate Lane, North and Land at Newgate Lane, South

Report to Inform Habitats Regulations Assessment Stage 1 and Stage 2

Fareham Land LP and Bargate Homes

May 2020

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Document Control

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Issue 1	May 2020	FINAL
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Rev:	Date:	Updated by:	Verified by:	Description of changes:

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Appendix B – Illustrative Masterplan

Appendix C – Qualifying Features of European Sites Screened into this Assessment

Appendix D – Newgate Lane North Nutrient Balancing Calculations

Appendix E – Newgate Lane South Nutrient Balancing Calculations



Glossary

AADT	Annual Average Daily Traffic
ALSE	Assessment of Likely Significant Effects
CEnv	Chartered Environmentalist
CIEEM	Chartered Institute of Ecology & Environmental Management
CJEU	Court of Justice of the European Union
EFT	Emission Factor Toolkit
GradCIEEM	Graduate Member of Chartered Institute of Ecology & Environmental Management
Habitats Regulations	Conservation of Habitats and Species Regulations 2017
HDV	Heavy Duty Vehicles
HRA	Habitats Regulations Assessment
IAQM	Institute for Air Quality Management
IROPI	Imperative Reasons of Over-riding Public Interest
LSE	Likely Significant Effect
MCIEEM	Member of Chartered Institute of Ecology & Environmental Management
Natura 2000 site	A European site designated for its nature conservation value
NO _x	Nitrogen Oxides
PC	Process Contribution
PEC	Predicted Environmental Concentration
PUSH	Partnership for Urban South Hampshire
SAC	Special Area of Conservation
SANG	Suitable Alternative Natural Greenspace
SPA	Special Protection Area
SWBGS	Solent Waders and Brent Goose Strategy
TEMPro	Trip End Model Presentation Program
TN	Total Nitrogen
WwTW	Wastewater Treatment Works



Executive Summary

Contents	Summary
Site location and description	<p>The site is located to the west of the Newgate Lane East in Fareham, Hampshire and is centred at OS Grid Reference SU 57163 03124. The site currently comprises of grazed paddocks, arable fields and outbuildings associated with a residential property. The fields form part of farmland surrounded by the built-up areas of Fareham to the north, Gosport to the east and south and Stubbington to the west. The newly constructed Newgate Lane East bypass is to the east of the site.</p> <p>The proposed development comprises two Outline applications: P/18/1118/OA Land at Newgate Lane, North (Fareham Land LP) for up to 75 dwellings and P/19/0460/OA Land at Newgate Lane, South (Bargate Homes) for up to 115 dwellings, with associated infrastructure, parking and landscaping.</p>
Scope of this Assessment	<p>This report assesses the pathways to LSE (HRA Stage 1) of each development upon relevant designated Natura 2000 sites and subsequently assesses the significance of effects upon the integrity of such designated Natura 2000 sites (HRA Stage 2).</p> <p>This is a submission to inform the Competent Authority's (Planning Inspector) HRA.</p>
Results of Stage 1: Screening	<p>The results from the Stage 1 Screening Assessment found four pathways to LSE that required Stage 2: Appropriate Assessment. These were:</p> <ul style="list-style-type: none"> • Loss of functionally linked habitat: Alone and in-combination; • Nutrient outputs during occupation: Alone and in-combination; • Recreational use during occupation: Alone and in-combination; and • Air quality changes during occupation: In-combination. <p>Air quality changes during construction was also identified as a potential pathway to LSE at Stage 1, but was screened out.</p>
Results of Stage 2: Appropriate Assessment	<p>The results from the Stage 2 Appropriate Assessment found that, for both Land North of Newgate Lane and Land South of Newgate Lane, with mitigation (both in the form of financial contributions to existing regional strategies), loss of functionally linked habitat and recreational use during occupation do not have the potential to affect the integrity of any European designated site for nature conservation.</p> <p>The detailed analysis of the potential for changes in air quality to act in-combination, and nutrient outputs during occupation found that there was no potential for the integrity of any Natura 2000 site to be affected and no mitigation was required.</p>
Conclusion	<p>The 'Competent Authority', is therefore considered not to require further assessment under the Habitats Regulations, and both proposed developments can proceed without Stage 3 and Stage 4 being completed.</p>



1.0 Introduction

1.1 Background

WYG was commissioned by Fareham Land LP and Bargate Homes in April 2020, to prepare a report to inform Stage 1: Screening and Stage 2: Appropriate Assessment of a Habitats Regulations Assessment (HRA). The report was required in relation to the development proposals which comprise the construction of up to 190 residential units across two development parcels. This report is intended to support appeals against non-determination of the two Outline planning applications for the site, as described in Section 1.3.

This report has been prepared by WYG Senior Ecologist Kevin Wood. The conditions pertinent to the report are provided in Appendix A.

1.2 Site Location

The site is located to the west of the Newgate Lane east in Fareham, Hampshire and is centred at Ordnance Survey (OS) National Grid Reference SU 57163 03124. The site is shown on Figure 1 and comprises of grazed paddocks, arable fields and outbuildings associated with a residential property. The property forms part of farmland surrounded by the built-up areas of Fareham to the north, Gosport to the east and south and Stubbington to the west. The newly constructed Newgate Lane East bypass is to the east of the site

1.3 Development Proposals

The proposed development comprises two Outline applications: P/18/1118/OA Land at Newgate Lane, North (Fareham Land LP) for up to 75 dwellings and P/19/0460/OA Land at Newgate Lane, South (Bargate Homes) for up to 115 dwellings, with associated infrastructure, parking and landscaping. The illustrative masterplan showing the development proposals is provided in Appendix B.

1.4 Requirements for the HRA

The requirement for an HRA is established through Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora, hereby referred to as the 'Habitats Directive', in Articles 6(3) and 6(4). The Habitats Directive is transposed into national legislation by the Conservation of Habitats and Species Regulations 2017. These are hereafter referred to as the 'Habitats Regulations'.

Under Regulation 63, any project which is likely to have a significant effect on a European site (either alone or in-combination with other projects) and is not directly connected with, or necessary for the management of the site, must be subject to an HRA to determine the implications for the site in view of its conservation objectives. This is determined during the Stage 1: Screening Assessment of an HRA (see below).

A Stage 2: Appropriate Assessment then needs to be carried out in respect of any plan or project which:



- either alone or in combination with other plans or projects would be likely to have a significant effect on a site designated within the European network; and
- is not directly connected with the management of the site for nature conservation.

The term European site is defined fully in Regulation 8 of the Habitats Regulations and includes:

- Special Areas of Conservation (SACs);
- candidate and proposed SACs;
- Special Protection Areas (SPAs);
- potential SPAs;
- proposed Wetlands of International Importance designated or proposed for their wetland features under the auspices of the Convention of Wetlands of International Importance (commonly referred to as 'Ramsar sites'); and
- sites identified for Natura 2000 compensatory measures.

The final two categories are afforded the same level of protection as SACs and SPAs as a matter of Government policy, and the assessment provisions of the Habitats Regulations are applied to them (Natural England, 2017).



2.0 Assessment Methodology

2.1 Assessment Guidance

The Habitats Directive and Regulations do not specify how assessment should be undertaken. In undertaking this HRA, the process we have adopted is that recommended in official EC guidance (EC, 2001). In this report, our Stage 1: Screening found that LSE were possible and so a Stage 2: Appropriate Assessment was required. These two stages form the first of four HRA stages, as described below:

- **Stage 1: Screening** – the process which identifies the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans and considers whether these impacts are likely to be significant. This is also known as an ‘assessment of likely significant affects (ALSE)’;
- **Stage 2: Appropriate assessment** – the consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in-combination with other projects or plans, with respect to the site’s structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts (in accordance with guidance following the recent decision by the CJEU; People Over Wind and Sweetman v Coillte Teoranta (C-323/17) regarding application of embedded mitigation at Stage 1 or Stage 2 of an HRA (Freeths, 2018));
- **Stage 3: Assessment of alternative solutions** – the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site; and
- **Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain** – an assessment of compensatory measures where, in the light of an assessment of Imperative Reasons of Over-riding Public Interest (IROPI), it is deemed that the project or plan should proceed (it is important to note that this guidance does not deal with the assessment of IROPI).

The Stage 1 Screening Assessment comprises four steps, as described below:

- **Step 1.** Determining whether the project or plan is directly connected with or necessary to the management of the Natura 2000 site(s);
- **Step 2.** Describing the project or plan and the description and characterisation of other projects or plans that in-combination have the potential for having significant effects on the Natura 2000 site(s);
- **Step 3.** Identifying the potential effects on the Natura 2000 site(s); and
- **Step 4.** Assessing the significance of any effects on the Natura 2000 site(s).

The Stage 2: Appropriate Assessment should identify the effects of those plans or projects on qualifying features of the European sites in relation to the Conservation Objectives of those sites and determine whether these effects will result in an adverse effect on the integrity of the designated site. Only where the decision maker (the Competent Authority – in this case the Planning Inspector), is satisfied that there will be no adverse effect on integrity, or where there are imperative reasons of overriding public interest (IROPI), can the plan or project be approved.



3.0 Stage 1: Screening

Projects may have spatial implications which can have further reaching effects than those predicted to fall within the development footprint. Specifically, it is recognised that the distance between a proposed development and a designated site is not a definitive determinant as to the likelihood or severity of an impact occurring. Site variables such as prevailing wind conditions, surface and groundwater flow direction will all have an influence on the relative distance at which an impact can occur.

Additionally, the mobile nature of qualifying interest bird species must also be considered, since an adverse effect on the qualifying species of a site, even if they are not present within the site for which they are a qualifying feature, may still result in a significant adverse impact upon a site.

3.1 Step 1 – Determining whether the development proposals are directly connected with or necessary to the management of the internationally designated site(s)

The development proposals are not connected with and are not necessary for the management of any internationally designated sites, although they do have the potential to affect them.

3.2 Step 2 – Description of the development proposals, Internationally Designated Sites that may be Affected and Approach taken to identifying Other Plans or Projects that could lead to In-combination Effects

3.2.1 Description of the Development Proposals

The planning applications comprise the construction of up to 190 dwellings with associated gardens, roads and open space as shown in Appendix B. Although the development comprises two separate applications (and subsequently two appeals), the proposals have always been conceived as a cohesive development, with the project team responsible for the applications and the two developers working collaboratively. Therefore they have been assessed together within this report.

3.2.2 List of the Internationally Designated Sites that may be Affected by the Development Proposals

The *Habitats Regulations Assessment for the Fareham Borough Local Plan* (Urban Edge Environmental Consulting, 2017) was the primary source used to identify internationally designated sites that may be affected by the proposals. This report screened the following sites, as shown in Figure 2 (the qualifying features of these sites are provided in Appendix C). These comprise:

- Butser Hill SAC;
- Solent and Isle of Wight Lagoons SAC;
- The New Forest Ramsar;
- The New Forest SAC;
- The New Forest SPA;
- Portsmouth Harbour SPA;



- Portsmouth Harbour Ramsar;
- Solent and Southampton Water SPA;
- Solent and Southampton Water Ramsar;
- Chichester and Langstone Harbours SPA;
- Chichester and Langstone Harbours Ramsar;
- River Itchen SAC;
- Solent Maritime SAC; and
- Solent and Dorset Coast SPA.

3.2.3 Approach taken to identifying Other Plans or Projects that could lead to In-combination Effects

In Step 3, four potential pathways to LSE were identified. To identify other plans and projects that could be relevant and act in-combination, it was first established whether effects could be mitigated by measures that also apply in-combination. For instance, the nutrient outputs mitigation would mitigate all effects leading to a zero net increase in nitrogen. Therefore, no search of other projects is necessary. Where this approach was taken, it is explained fully in the text.

For the assessment of air quality impacts, the methodology used for the in-combination assessment involves the use of TEMPro modelling. This predicts growth in traffic numbers based on several factors, including population growth as it was not possible to establish traffic data for all other applications that could result in increases in traffic levels on roads affected by the development proposals by any other means. This is explained fully in Section 3.2.4 and in the *Newgate Lane, Fareham: Air Quality Ecological Impacts Statement* (REC Delivering Solutions, 2019).

Step 3 – Identifying the Potential Effects on Internationally Designated site(s)

The potential pathways to LSE were identified following a review of the following:

- The *Habitats Regulations Assessment for the Fareham Borough Local Plan* (Urban Edge Environmental Consulting, 2017);
- The designation citation of part of the site as a Low Use Site (F15) identified in the Solent Waders and Brent Goose Strategy (SWBGS, 2019);
- The qualifying features of SACs and SPAs (see Appendix C);
- The conservation objectives for SACs and SPAs;
- The threats to SPAs;
- The Ramsar criteria; and
- Site Improvement Plans for SACs and SPAs.

Following this review the following potential pathways to LSE were considered to be relevant to the development proposals based on the activities during construction and operation activities:

- Loss of functionally linked habitat for SPA qualifying bird species;
- Air quality changes during occupation primarily from exhaust emissions caused by increases in traffic arising from the development proposals;
- Increased recreational use during occupation use of Solent European designated sites identified in the SWBGS; and



- Increases in nutrient outputs from changing the occupied use of the site from agricultural use to residential use.

These are discussed in the following section, where the differentiation is made with respect to the potential for pathways to act alone or in-combination.

This report does not discuss those pathways where there is no potential for them to result in LSE. Therefore, only those where there is a tangible risk of the effect occurring are discussed.

3.2.4 Loss of functionally linked habitat: Alone and in-combination

Part of both sites lie within a Low Use Site (F15) identified in the Solent Wader and Brent Goose Strategy (SWBGS) (Solent WBGS, 2019), as shown in Figure 3. This being the case, a potential pathway to LSE therefore exists as the site may support qualifying species of bird from SWBGS European sites.

Loss of functionally linked habitat: Alone and In-combination has therefore been taken forward to Stage 2: Appropriate Assessment.

3.2.5 Air quality changes during construction: Alone and in-combination

An *Air Quality Ecological Impacts Statement* was completed by REC Delivering Solutions (2019). The salient points from the report have been provided below and are discussed as necessary.

The report does not make any reference to the potential for the development proposals to affect any Natura 2000 site during construction. This is considered appropriate as there are no Natura 2000 sites within the typical zone of influence of air quality changes caused by construction i.e. releases of fugitive dust. This is identified by the Institute of Air Quality Management (IAQM) (2014) as being up to 50 m from sources. As shown in Figure 2, none of the sites screened into this assessment are within this zone.

The report also does not make reference to the potential for construction traffic to result in a potential pathway to LSE. However, as shown in Section 3.2.5, predicted Annual Average Daily Traffic (AADT) movements for the occupied site (which are always higher than during construction) are not predicted to be higher than the threshold for requiring detailed assessment set out in the Natural England guidance document *Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations* (Natural England, 2018). These are based on 1000 AADT for cars and 200 AADT for heavy duty vehicles (HDV) not being exceeded.

It is therefore considered that Air Quality Changes During Construction: Alone and In-Combination can be screened out and are not taken further in this assessment.

3.2.6 Air quality changes during occupation: Alone and in-combination

An *Air Quality Ecological Impacts Statement* was completed by REC Delivering Solutions (2019). The salient points from the report have been provided below and are discussed as necessary.



- The report found that there were two sites within 200 m of roads potentially affected by increases in traffic levels caused by the development proposals. These were the Portsmouth Harbour Ramsar and SPA. This distance is consistent with *Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations* (Natural England, 2018).
- The report uses Natural England guidance to establish that the development proposals do not have the potential to act alone. This is based on the development proposals generating 100 AADT for cars and no AADT for HDV:

"The development is predicted to generate 100 AADT with no HDVs. As such, roads which are predicted to experience increases in traffic flows associated with the development are not expected to experience changes of over 1,000 AADT or 200 HDVs."

(REC Delivering Solutions, 2019: Page 14)

The 1000 AADT movements of cars or 200 AADT of HDV thresholds are therefore not predicted to be exceeded. It is therefore considered that changes in air quality as a result of increases in traffic movements during operation alone can be screened out at Stage 1 and Stage 2: Appropriate Assessment is not required.

- The report found that it was not possible to establish that the level of traffic on roads affected by the development proposals in-combination with other plans and projects would be below 1000 AADT movements of cars and / or 200 AADT of HDV. Changes in air quality as a result of increases in traffic movements during operation in-combination has therefore been taken forward to Stage 2: Appropriate Assessment.

Air Quality Changes During Occupation: Alone can be screened out and has not been taken forward to Stage 2: Appropriate Assessment.

Air Quality Changes During Occupation: In-combination has therefore been taken forward to Stage 2: Appropriate Assessment.

3.2.7 Recreational use during occupation: Alone and in-combination

The site is within 5.6 km of the Solent and Southampton Water SPA and Ramsar and the Portsmouth Harbour SPA and Ramsar. This means that the impacts arising from the development proposals due to recreational pressure must be mitigated for in accordance with the Solent Recreation Mitigation Strategy (Bird Aware Solent, 2017). This strategy determined that all residential developments within 5.6 km had the potential to result in increased visitor pressure with subsequent disturbance impacts on qualifying bird species.

This is considered to apply both alone and in-combination. However, due to the proposed mitigation, it is not necessary to specifically identify all projects that could result in an increase in recreational pressure on Solent European designated sites included within the strategy (i.e. those within 5.6 km).

Recreational Use During Occupation: Alone and In-combination therefore been taken forward to Stage 2: Appropriate Assessment.



3.2.8 Nutrient outputs during occupation: Alone and in-combination

In June 2018, an Integrated Water Management Study for South Hampshire was published by the Partnership for Urban South Hampshire (PUSH) (2018) has identified that there is uncertainty in some locations as to whether there will be sufficient capacity to accommodate new housing growth, and the potential for adverse effects upon coastal SPAs (including the Solent and Southampton Water SPA) as a result of nitrogen discharge.

Natural England have identified that there is the potential for nutrients arising from increased wastewater from residential development to affect the qualifying features of European designated sites in the Solent (Natural England, 2020).

This effect has been identified as having the potential to promote algae growth that can affect aquatic vegetation and increase turbidity thereby affecting foraging efficacy of fish-eating birds, and the availability of suitable vegetation for species such as dark-bellied brent geese. These effects could ultimately impact all aspects of the functioning of European designated sites in an interconnected manner.

Included within this guidance, Natural England have provided a calculator for establishing the change in nutrient (nitrogen) levels in water arising from the site pre- and post-development. This includes calculating the change in surface water as a result of a change in land use, and from wastewater that is discharged into the Solent with consent from Peel Common Wastewater Treatment Works (WwTW) (and eventually reaches the Solent).

Wastewater from the development proposals will be treated at the Southern Water WwTW at Peel Common, but ultimately water will discharge to the sea and may contribute to background nitrogen levels within the Solent. The development therefore has the potential to result in LSE on Solent SACs, SPAs and Ramsars due to direct and indirect effects of water pollution and therefore this pathway cannot be screened out at Stage 1 and Stage 2 Appropriate Assessment is required.

This is considered to apply both alone and in-combination, but due to the proposed mitigation, it is not necessary to specifically identify all projects within the Solent catchment that could result in an increase in nutrient discharge into the Solent.

Nutrient Outputs During Occupation: Alone and In-combination therefore been taken forward to Stage 2: Appropriate Assessment.

3.3 Step 4 – Assessing the significance of any effects on the Natura 2000 site(s)

The Stage 1: Screening Assessment found that there were two pathways to LSE that require appropriate assessment at Stage 2. These are summarised in Table 1. These LSE apply to both Land North of Newgate Lane and Land South of Newgate Lane.



Table 1 Summary of Stage 1 Screening

Pathway	Site	Stage 2 required
Loss of functionally linked habitat: Alone and in-combination	Portsmouth Harbour SPA and Ramsar Solent and Southampton Water SPA and Ramsar	Yes
Air quality changes during construction: Alone	None within (50 m) zone of influence of the site.	No
Air quality changes during construction: In-combination	None within (50 m) zone of influence of the site.	No
Air quality changes during occupation: Alone	Portsmouth Harbour Ramsar and SPA	No
Air quality changes during occupation: In-combination	Portsmouth Harbour Ramsar and SPA	Yes
Nutrient outputs during occupation: Alone	All Solent European sites.	Yes
Nutrient outputs during occupation: In-combination	All Solent European sites.	Yes
Recreational use during occupation Alone	Portsmouth Harbour SPA and Ramsar Solent and Southampton Water SPA and Ramsar	Yes
Recreational use during occupation: In-combination	Portsmouth Harbour SPA and Ramsar Solent and Southampton Water SPA and Ramsar	Yes

It is therefore concluded that there are no pathways for LSE on the following European designated sites and they are not taken further in the HRA process:

- Butser Hill SAC;
- River Itchen SAC;
- The New Forest Ramsar;
- The New Forest SAC; and
- The New Forest SPA.



4.0 Stage 2: Appropriate Assessment

The following sections discuss the potential pathways to LSE that could result in impacts on the integrity of the European sites identified during Stage 1: Screening, summarised in Table 1.

4.1 Loss of Functionally Linked Habitat: Alone and In-combination

The site was surveyed from November 2013 to March 2014 and October 2014 to March 2015 to inform the application to construct the new Newgate Lane East and Stubbington Bypass (WSP, 2015). During the surveys, it was found that it did not support significant numbers of SPA qualifying species and the bypass was subsequently approved and constructed. The bypass now bisects site F15 and it is considered that this has further reduced the suitability of that habitats to support SWBGS species. Surveys were also carried out on 6th and 17th March 2018 (Ethos Environmental Planning, 2019) and no geese or waders were recorded, with the only SPA-listed species being a single black-headed gull *Chroicocephalus ridibundus* recorded on the 17th March 2018. However, there is not sufficient evidence to determine with certainty that the loss of Low Use Site F15 would not result in adverse effects on the qualifying SPA bird population.

4.1.1 Land at Newgate Lane, North

The proposed development at Land at Newgate Lane, North will result in the loss of 3.14 ha of Low Use Site F15. It is proposed that the loss of the site is mitigated through a financial contribution of £35,610 per hectare, in accordance with the Solent Waders and Brent Goose Strategy Guidance on Off-setting and Mitigation Requirements (October 2018). This payment will be secured within a Section 106 agreement and will contribute to the management and enhancement of the wader and brent goose network. This approach has been agreed with Natural England in their consultation responses on the Outline planning applications.

It is therefore considered that, taking into account mitigation, loss of functionally linked habitat at Land at Newgate Lane, North will not affect the integrity of the Solent and Southampton Water SPA and Ramsar or Portsmouth Harbour SPA and Ramsar.

4.1.2 Land at Newgate Lane, South

The proposed development at Land at Newgate Lane, South will result in the loss of 4.67 ha of Low Use Site F15. It is proposed that the loss of the site is mitigated through a financial contribution of £35,610 per hectare, in accordance with the Solent Waders and Brent Goose Strategy Guidance on Off-setting and Mitigation Requirements (October 2018). This payment will be secured within a Section 106 agreement and will contribute to the management and enhancement of the wader and brent goose network. This approach has been agreed with Natural England in their consultation responses on the Outline planning applications.

It is therefore considered that, taking into account mitigation, loss of functionally linked habitat at Land at Newgate Lane, South will not affect the integrity of the Solent and Southampton Water SPA and Ramsar or Portsmouth Harbour SPA and Ramsar.



4.2 Air Quality Changes during Occupation: In-combination

The data and assessment from the *Air Quality Ecological Impacts Statement* (REC Delivering Solutions, 2020) has been used to inform this Stage 2: Appropriate Assessment. These data have been used to follow the guidance provided in *Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations* (Natural England, 2018) to make the assessment. The *Air Quality Ecological Impacts Statement* did not assess the two applications individually, but in-combination. Therefore this assessment takes the same approach.

The data in the *Air Quality Ecological Impacts Statement* uses the following information:

- 2017 Verification of Traffic Data (see Appendix II of the *Air Quality Ecological Impacts Statement*) which uses the Department for Transport (DfT) Matrix web tool¹ and Trip End Model Presentation Program (TEMPRO) software package to allow for conversion from the obtained 2017 traffic flow year to 2024 to represent the development opening year.
- Process contribution (PC) – This is the predicted emissions as a result of the traffic generated from the development proposal including those in-combination effects i.e. emissions from traffic generated by other plans or projects on the same roads affected by these development proposals. The report included four projects as having the potential to act in-combination which were therefore included in the PC value, these were:
 - Stubbington Bypass;
 - Land at Old Street, Stubbington (P/17/1451/OA);
 - Newlands Farm, Fareham (P15/1279/OA); and
 - Daedalus Development.

These data were used to assess whether the PC exceeded 1% of the critical load / level of nitrogen / acid for the habitats of the Portsmouth Harbour Ramsar and SPA within 200 m of roads affected by traffic from the development proposals. These levels are referred to jointly as the environmental standards (Page 13) and environmental quality standards (EQS) (all tables) in the *Air Quality Ecological Impacts Statement*. These were determined for all 10 parcels of land within the Portsmouth Harbour Ramsar and SPA using the Air Pollution Information System (APIS) website.

The 1% level is used as a threshold for significance in the report and is consistent with *Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations* (Natural England, 2018). Where this is not exceeded therefore, the PC for emissions is no considered to be significant.

The findings from the *Air Quality Ecological Impacts Statement* are summarised in Table 2, these apply to 10 parcels of land within the Portsmouth Harbour Ramsar and SPA that are within 200 m of roads affected by traffic generated by the development proposals.

¹ It should be noted that the DfT matrix is referenced in DEFRA guidance LAQM (TG16) (DEFRA, 2018) as being a suitable source of data for air quality assessments and is therefore considered to provide a good representation of traffic flows in the vicinity of the site.



Table 2 Summary of the Quantification of PC Screening

Emission	Range of Proportion of EOS at the 10 parcels within Portsmouth Harbour Ramsar and SPA (%)	1% of EOS Exceeded
Predicted Annual Mean NOx Concentration ($\mu\text{g}/\text{m}^3$)	0 – 1	No
Predicted 24-hour Mean NOx Concentration ($\mu\text{g}/\text{m}^3$)	0 – 1	No
Predicted Annual Mean NH3 Concentrations	0	No
Predicted Annual Mean Nitrogen Deposition Rate ($\text{kgN}/\text{ha}/\text{yr}$)	0	No
Predicted Annual Mean Acid Deposition Rate ($\text{kq}/\text{ha}/\text{yr}$)	0	No

These results show that 1% of the EOS of any pollutant would not be exceeded at any of the 10 locations within the Portsmouth Harbour Ramsar and SPA that are within 200 m of roads affected by traffic generated by the development proposals.

It is therefore considered that changes in air quality during operation as a result of traffic generated by Land at Newgate Lane, North or Land at Newgate Lane, South will not affect the integrity of Portsmouth Harbour Ramsar or SPA.

4.3 Recreational use during Occupation: Alone and In-combination

4.3.1 Land at Newgate Lane, North

Land at Newgate Lane, North will comprise a development of up to 75 dwellings. As discussed in Section 3.2.7, a per-unit financial contribution will be made in accordance with the latest charging schedule for the Solent Recreation Mitigation Strategy (Bird Aware Solent, 2017) in order to mitigate for potential alone and in-combination recreational impacts upon the Solent SPAs and Ramsars.

This financial contribution will be secured within a Section 106 Agreement.

With the application of this mitigation, recreation as a result of Land at Newgate Lane, North is predicted to have no impact on the integrity of the Solent SPAs and Ramsars.

4.3.2 Land at Newgate Lane, South

Land at Newgate Lane, South will comprise a development of up to 115 dwellings. As discussed in Section 3.2.7, a per-unit financial contribution will be made in accordance with the latest charging schedule for the Solent Recreation Mitigation Strategy (Bird Aware Solent, 2017) in order to mitigate for potential alone and in-combination recreational impacts upon the Solent SPAs and Ramsars.

This financial contribution will be secured within a Section 106 Agreement.



With the application of this mitigation, recreation as a result of Land at Newgate Lane, South is predicted to have no impact on the integrity of the Solent SPAs and Ramsars.

4.4 Nutrient Outputs during Occupation: Alone and In-combination

Due to the uncertainty over whether new development can be accommodated by existing wastewater treatment infrastructure without causing harm to coastal European sites, Natural England advise that all residential development should achieve nitrogen neutrality.

4.4.1 Land at Newgate Lane, North

A Nitrate Budget Calculation was completed by CEP (CEP, 2020a) which concluded that the development would result in a decrease of -28.1 Kg/yr TN.

As part of this assessment, a further calculation has been undertaken which takes a more precautionary approach to the assessment of existing land uses. This uses Version 4 of Natural England's *Advice on Achieving Nutrient Neutrality for New Development in the Solent Region* (Natural England, 2020) for calculating nitrogen budgets. The assumptions used in this assessment are as follows:

- 110 litres of waste water will be generated per person per day;
- Wastewater will be treated at Peel Common WwTW;
- Peel Common has a discharge consent limit of 9 mg/l TN;
- The scheme comprises a maximum of 75 dwellings;
- The post-development site will comprise 3.37 ha of urban land and 0.55 ha of open space;
- An occupancy rate of 2.4 people per dwelling as per Natural England guidance; and
- The pre-development site comprises 3.4 ha of cereals (31.20 Kg/TN/ha/yr) and 0.55 ha of land not in agricultural use (5.00 Kg/TN/ha/yr).

The full calculations are provided in Appendix D (Land at Newgate Lane, North) and are summarised in Table 3.

Table 3 Summary of nutrient input calculations (Land at Newgate Lane, North)

Option	Current Land Use TN Load (A)	Waste water from Future Land Use TN Load (B)	Future Land Use TN Load (C)	Change (B+C-A)
75 units	108.830 Kg/TN/yr	44.085 Kg/TN/yr	51.091 Kg/TN/yr	-13.654 Kg/TN/yr

The calculations show that taking a more precautionary approach, the development proposals would still result in a decrease in nitrogen load of -13.654 Kg/yr TN.



A planning condition should be attached to any permission requiring a landscape management plan setting out how the open space on site will be managed in the long-term to prevent any additional nutrient inputs (for example through inclusion of dog waste bins).

As the combined changes in land use for Land at Newgate Lane, North will result in a net decrease in nutrient inputs into the Solent, there is no potential for an adverse effect on the integrity of the Solent European sites for nature conservation alone or in-combination.

4.4.2 Land at Newgate Lane, South

A Nitrate Budget Calculation was completed by CEP (CEP, 2020b) which concluded that the development would result in a decrease of -21.6 Kg/yr TN.

As part of this assessment, a further calculation has been undertaken which takes a more precautionary approach to the assessment of existing land uses. This uses Version 4 of Natural England's *Advice on Achieving Nutrient Neutrality for New Development in the Solent Region* (Natural England, 2020) for calculating nitrogen budgets. The assumptions used in this assessment are as follows:

- 110 litres of waste water will be generated per person per day;
- Wastewater will be treated at Peel Common WwTW;
- Peel Common has a discharge consent limit of 9 mg/l TN;
- The scheme comprises a maximum of 115 dwellings;
- The post-development site will comprise 4.73 ha of urban land and 1.27 ha of open space;
- An occupancy rate of 2.4 people per dwelling as per Natural England guidance; and
- The pre-development site comprises 4.6 ha of cereals (31.20 Kg/TN/ha/yr) and 1.4 ha of lowland grazing (13.00 Kg/TN/ha/yr).

The full calculations are provided in Appendix E (Land at Newgate Lane, South) and are summarised in Table 4.

Table 4 Summary of nutrient input calculations (Land at Newgate Lane, South)

Option	Current Land Use TN Load (A)	Waste water from Future Land Use TN Load (B)	Future Land Use TN Load (C)	Change (B+C-A)
115 units	161.720 Kg/TN/yr	67.597 Kg/TN/yr	73.989 Kg/TN/yr	-20.134 Kg/TN/yr

The calculations show that taking a more precautionary approach, the development proposals would still result in a decrease in nitrogen load of -20.134 Kg/yr TN.

A planning condition should be attached to any permission requiring a landscape management plan setting out how the open space on site will be managed in the long-term to prevent any additional nutrient inputs (for example through inclusion of dog waste bins).



As the combined changes in land use for Land at Newgate Lane, South will result in a net decrease in nutrient inputs into the Solent, there is no potential for an adverse effect on the integrity of the Solent European sites for nature conservation alone or in-combination.

5.0 Summary

The Stage 2: Appropriate Assessment found that for all potential pathways to LSE taken forward to Stage 2: Appropriate Assessment, with the application of mitigation, there would be no impact on the integrity of any European site as a result of either Land at Newgate Lane, North or Land at Newgate Lane, South.

As such, it is considered that the 'Competent Authority' can permit each development and does not require Stage 3 or Stage 4 assessments to be undertaken, as described in Section 2.1.



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Figures

Figure 1: Site Location Plan

**Figure 2: European Designated Sites within 10 km of the
Boundary of the Site**

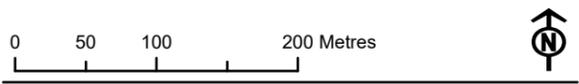
Figure 3: Site Location in Relation to Low Use Site F15



Rev	Date	Notes
A	30/04/20	Initial map production

Legend

Site boundary



Site Location Plan

**Newgate Lane North and South, Fareham
Fareham Land LP and Bargate Homes**

Scale at A3: 1:5,000	Project No: A117387	Drawing No: Figure 1	Revision: A
Drawn by: Ben Blowers		Drawn date: 30/04/2020	Approved by: Kevin Wood

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Rev	Date	Notes
A	30/04/20	Initial map production

Legend

- Site boundary
- Site boundary 10km buffer
- Special Protection Areas (SPA)
- Special Areas of Conservation (SAC)
- Ramsar
- Potential Special Protection Areas (pSPA)



European Designated Sites within 10 km of the Boundary of the Site

**Newgate Lane North and South, Fareham
Fareham Land LP and Bargate Homes**

Scale at A3: 1:77,500	Project No: A117387	Drawing No: Figure 2	Revision: A
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Drawn by: Ben Blowers	Drawn date: 30/04/2020	Approved by: Kevin Wood
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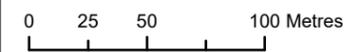
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Rev	Date	Notes
A	30/04/20	Initial map production

Legend

- Site boundary
- F15 site boundary



Site Location in Relation to Low Use Site F15

**Newgate Lane North and South, Fareham
Fareham Land LP and Bargate Homes**

Scale at A3: 1:3,000	Project No: A117387	Drawing No: Figure 3	Revision: A
Drawn by: Ben Blowers	Drawn date: 30/04/2020	Approved by: Kevin Wood	

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Appendix A – Report Conditions



REPORT CONDITIONS

This Report has been prepared using reasonable skill and care for the sole benefit of Pegasus Group ("the Client") for the proposed uses stated in the report by WYG Environment Planning Transport Limited ("WYG"). WYG exclude all liability for any other uses and to any other party. The report must not be relied on or reproduced in whole or in part by any other party without the copyright holder's permission.

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The report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections'. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times. No investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions. The "shelf life" of the Report will be determined by a number of factors including; its original purpose, the Client's instructions, passage of time, advances in technology and techniques, changes in legislation etc. and therefore may require future re-assessment.

The whole of the report must be read as other sections of the report may contain information which puts into context the findings in any executive summary.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. WYG accept no liability for issues with performance arising from such factors.



Appendix B – Illustrative Masterplan



- APPLICATION BOUNDARY
- LAND USE:**
- RESIDENTIAL PARCELS
- ┌ PRIMARY FRONTAGE
- ┐ SECONDARY FRONTAGE
- PUBLIC OPEN SPACE
- ACCESS AND CONNECTIONS:**
- ➡ PROPOSED ACCESS
- ⊙ RETAINED EXISTING ACCESS TO HAMBROOK LODGE
- ┌ PRIMARY SPINE ROAD
- ┐ SECONDARY ROAD
- └ TERTIARY ROAD
- ⋯ FOOTPATH CONNECTIONS
- ✦ FOOTPATHS KEY NODE
- GREEN AND BLUE INFRASTRUCTURE:**
- EXISTING VEGETATION
- PROPOSED VEGETATION
- PROPOSED LEAP (400SQM WITH 20M OFFSET)
- ┌ DRAINAGE CHANNELS
- INDICATIVE ATTENUATION
- OTHER:**
- ✖ PROPOSED PUMPING STATION (MIN 12M X 8M WITH 15M OFFSET)

LAND ADJACENT TO NEWGATE LANE, FAREHAM - ILLUSTRATIVE FRAMEWORK MASTERPLAN - NORTHERN PARCEL





- APPLICATION BOUNDARY
- LAND USE:**
 - RESIDENTIAL PARCELS
 - PRIMARY FRONTAGE
 - SECONDARY FRONTAGE
 - PUBLIC OPEN SPACE
- ACCESS AND CONNECTIONS:**
 - PROPOSED ACCESS
 - RETAINED EXISTING ACCESS TO HAMBROOK LODGE
 - PRIMARY SPINE ROAD
 - SECONDARY ROAD
 - TERTIARY ROAD
 - FOOTPATH CONNECTIONS
 - FOOTPATHS KEY NODE
- GREEN AND BLUE INFRASTRUCTURE:**
 - EXISTING VEGETATION
 - PROPOSED VEGETATION
 - PROPOSED LEAP (400SQM WITH 20M OFFSET)
 - DRAINAGE CHANNELS
 - INDICATIVE ATTENUATION
- OTHER:**
 - PROPOSED PUMPING STATION (MIN 12M X 8M WITH 15M OFFSET)

LAND ADJACENT TO NEWGATE LANE, FAREHAM - ILLUSTRATIVE FRAMEWORK MASTERPLAN - SOUTHERN PARCEL





Appendix C – Qualifying Features of European Sites Screened into this Assessment



Butser Hill SAC (JNCC, 2015a)

Annex I habitats that are a primary reason for selection of this site

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia)
- *Taxus baccata* woods of the British Isles

Solent and Isle of Wight Lagoons SAC (JNCC, 2015b)

Annex I habitats that are a primary reason for selection of this site

1150 Coastal lagoons * Priority feature

The Solent on the south coast of England encompasses a series of **Coastal lagoons**, including percolation, isolated and sluiced lagoons. The site includes a number of lagoons in the marshes in the Keyhaven – Pennington area, at Farlington Marshes in Chichester Harbour, behind the sea-wall at Bembridge Harbour and at Gilkicker, near Gosport. The lagoons show a range of salinities and substrates, ranging from soft mud to muddy sand with a high proportion of shingle, which support a diverse fauna including large populations of three notable species: the nationally rare foxtail stonewort *Lamprothamnium papulosum*, the nationally scarce lagoon sand shrimp *Gammarus insensibilis*, and the nationally scarce starlet sea anemone *Nematostella vectensis*. The lagoons in Keyhaven – Pennington Marshes are part of a network of ditches and ponds within the saltmarsh behind a sea-wall. Farlington Marshes is an isolated lagoon in marsh pasture that, although separated from the sea by a sea-wall, receives sea water during spring tides. The lagoon holds a well-developed low-medium salinity insect-dominated fauna. Gilkicker Lagoon is a sluiced lagoon with marked seasonal salinity fluctuation and supports a high species diversity. The lagoons at Bembridge Harbour have formed in a depression behind the sea-wall and sea water enters by percolation. Species diversity in these lagoons is high and the fauna includes very high densities of *N. vectensis*.

The New Forest Ramsar (JNCC, 1993)

There are three Ramsar criteria for which the Dorset Heathlands Ramsar is designated.

Ramsar criterion 1

Valley mires and wet heaths are found throughout the site and are of outstanding scientific interest. The mires and heaths are within catchments whose uncultivated and undeveloped state buffer the mires against adverse ecological change. This is the largest concentration of intact valley mires of their type in Britain.

Ramsar criterion 2

The site supports a diverse assemblage of wetland plants and animals including several nationally rare species. Seven species of nationally rare plant are found on the site, as are at least 65 British Red Data Book species of invertebrate.

Ramsar criterion 3

The mire habitats are of high ecological quality and diversity and have undisturbed transition zones. The invertebrate fauna of the site is important due to the concentration of rare and scarce wetland species. The whole site complex, with its examples of semi-natural habitats is essential to the genetic and ecological diversity of southern England.



The New Forest SAC (JNCC, 2015c)

There are 11 Annex I habitats present that are a primary reason for selection of this site:

- **3110** Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae);
- **3130** Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea;
- **4010** Northern Atlantic wet heaths with *Erica tetralix*;
- **4030** European dry heaths;
- **6410** Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae);
- **7150** Depressions on peat substrates of the Rhynchosporion;
- **9120** Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion robori-petraeae or Ilici-Fagenion);
- **9130** Asperulo-Fagetum beech forests;
- **9190** Old acidophilous oak woods with *Quercus robur* on sandy plains;
- **91D0** Bog woodland; and
- **91E0** Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior* (Alno-Padion, Alnion incanae, Salicion albae).

There are two Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site:

- **7140** Transition mires and quaking bogs
- **7230** Alkaline fens

There are two Annex II species that are primary reasons for selection of this site (JNCC, 2015):

- **1044** Southern damselfly (*Coenagrion mercurial*); and
- **1083** Stag beetle (*Lucanus cervus*).

There is one Annex II species present as a qualifying feature, but not a primary reason for site selection:

- **1166** Great crested newt (GCN) (*Triturus cristatus*)

The New Forest SPA (JNCC, 2001a)

There are four Annex I species present during the breeding season that are qualifying species for selection of this site:

- Dartford warbler, 538 pairs representing at least 33.6% of the breeding population in Great Britain;
- Honey buzzard (*Pernis apivorus*), two pairs representing at least 10.0% of the breeding population in Great Britain;
- Nightjar, 300 pairs representing at least 8.8% of the breeding population in Great Britain; and
- Woodlark, 184 pairs representing at least 12.3% of the breeding population in Great Britain (Count as at 1997).



There is one Annex I species present during the over-wintering season that is a qualifying species for selection of this site:

- Hen harrier, 15 individuals representing at least 2.0% of the wintering population in Great Britain.

Portsmouth Harbour SPA (JNCC, 2001b)

Over winter

Dark-bellied Brent Goose *Branta bernicla bernicla*, 2,847 individuals representing at least 0.9% of the wintering Western Siberia/Western Europe population (5-year peak mean 1991/2 - 1995/6).

Portsmouth Harbour Ramsar (JNCC, 1995)

Ramsar criterion 3

The intertidal mudflat areas possess extensive beds of eelgrass *Zostera angustifolia* and *Zostera noltei* which support the grazing dark-bellied brent geese populations. The mud-snail *Hydrobia ulvae* is found at extremely high densities, which helps to support the wading bird interest of the site. Common cord-grass *Spartina anglica* dominates large areas of the saltmarsh and there are also extensive areas of green algae *Enteromorpha* spp. and sea lettuce *Ulva lactuca*. More locally the saltmarsh is dominated by sea purslane *Halimione portulacoides* which gradates to more varied communities at the higher shore levels. The site also includes a number of saline lagoons hosting nationally important species.

Ramsar criterion 6

Dark-bellied brent goose, *Branta bernicla bernicla*, 2105 individuals, representing an average of 2.1% of the GB population (5-year peak mean 1998/9-2002/3).

Solent and Southampton Water SPA (JNCC, 2001c)

This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

- During the breeding season;
 - Common tern (*Sterna hirundo*), 267 pairs representing at least 2.2% of the breeding population in Great Britain (5-year peak mean, 1993-1997);
 - Little tern (*Sterna albifrons*), 49 pairs representing at least 2.0% of the breeding population in Great Britain (5-year peak mean, 1993-1997);
 - Mediterranean gull (*Larus melanocephalus*), 2 pairs representing at least 20.0% of the breeding population in Great Britain (5-year peak mean, 1994-1998);
 - Roseate tern (*Sterna dougalli*), 2 pairs representing at least 3.3% of the breeding population in Great Britain (5-year peak mean, 1993-1997); and
 - Sandwich tern (*Sterna sandvicensis*), 231 pairs representing at least 1.7% of the breeding population in Great Britain (5-year peak mean, 1993-1997).

This site also qualifies under Article 4.2 of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:



- Over winter;
 - Black-tailed godwit (*Limosa limosa islandica*), 1,125 individuals representing at least 1.6% of the wintering Iceland - breeding population (5-year peak mean, 1992/3-1996/7);
 - Dark-bellied brent goose (*Branta bernicla bernicla*), 7,506 individuals representing at least 2.5% of the wintering Western Siberia/Western Europe population (5-year peak mean, 1992/3-1996/7);
 - Ringed plover (*Charadrius hiaticula*), 552 individuals representing at least 1.1% of the wintering Europe/Northern Africa - wintering population (5-year peak mean, 1992/3-1996/7); and
 - Teal (*Anas crecca*), 4,400 individuals representing at least 1.1% of the wintering Northwestern Europe population (5-year peak mean, 1992/3-1996/7).

The area also qualifies under Article 4.2 of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl:

Over winter, the area regularly supports 53,948 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: gadwall (*Anas strepera*), teal, ringed plover, black-tailed godwit, little grebe (*Tachybaptus ruficollis*), great crested grebe (*Podiceps cristatus*), cormorant (*Phalacrocorax carbo*), dark-bellied brent goose, wigeon (*Anas penelope*), redshank (*Tringa tetanus*), pintail (*Anas acuta*), shoveler (*Anas clypeata*), red-breasted merganser (*Mergus serrator*), grey plover (*Pluvialis squatarola*), lapwing (*Vanellus vanellus*), dunlin (*Calidris alpina alpina*), curlew (*Numenius arquata*) and shelduck (*Tadorna tadorna*).

Solent and Southampton Water Ramsar (JNCC, 1998)

Ramsar Criterion 1

The site is one of the few major sheltered channels between a substantial island and mainland in European waters, exhibiting an unusual strong double tidal flow and has long periods of slack water at high and low tide. It includes many wetland habitats characteristic of the biogeographic region: saline lagoons, saltmarshes, estuaries, intertidal flats, shallow coastal waters, grazing marshes, reedbeds, coastal woodland and rocky boulder reefs.

Ramsar Criterion 2

The site supports an important assemblage of rare plants and invertebrates. At least 33 British Red Data Book invertebrates and at least eight British Red Data Book plants are represented on site.

Ramsar Criterion 5

Assemblages of international importance:

- Species with peak counts in winter: 51343 waterfowl (5-year peak mean 1998/99-2002/2003).

Ramsar Criterion 6

Species/populations occurring at levels of international importance.

Qualifying Species/populations (as identified at designation):

- Species with peak counts in spring/autumn:



- Ringed plover, Europe/Northwest Africa, 397 individuals, representing an average of 1.2% of the GB population (5-year peak mean 1998/9-2002/3).
- Species with peak counts in winter:
 - Dark-bellied brent goose, 6456 individuals, representing an average of 3% of the population (5-year peak mean 1998/9-2002/3);
 - Eurasian teal, NW Europe, 5514 individuals, representing an average of 1.3% of the population (5-year peak mean 1998/9-2002/3); and
 - Black-tailed godwit, Iceland/W Europe, 1240 individuals, representing an average of 3.5% of the population (5-year peak)

Chichester and Langstone Harbours SPA (JNCC, 2001d)

During the breeding season;

Little Tern *Sterna albifrons*, 100 pairs representing up to 4.2% of the breeding population in Great Britain (5-year mean, 1992-1996)

Sandwich Tern *Sterna sandvicensis*, 158 pairs representing up to 1.1% of the breeding population in Great Britain (1998)

On passage;

Little Egret *Egretta garzetta*, 137 individuals representing up to 17.1% of the population in Great Britain (Count as at 1998)

Over winter;

Bar-tailed Godwit *Limosa lapponica*, 1,692 individuals representing up to 3.2% of the wintering population in Great Britain (5-year peak mean 1991/2 - 1995/6)

Little Egret *Egretta garzetta*, 100 individuals representing up to 20.0% of the wintering population in Great Britain (Count as at 1998).

This site also qualifies under **Article 4.2** of the Directive (79/409/EEC) by supporting populations of European importance of the following migratory species:

On passage;

Ringed Plover *Charadrius hiaticula*, 2,471 individuals representing up to 4.9% of the Europe/Northern Africa - wintering population (5-year peak mean 1991/2 - 1995/6)

Over winter;

Black-tailed Godwit *Limosa limosa islandica*, 1,003 individuals representing up to 1.4% of the wintering Iceland - breeding population (5-year peak mean 1991/2 - 1995/6)

Dark-bellied Brent Goose *Branta bernicla bernicla*, 17,119 individuals representing up to 5.7% of the wintering Western Siberia/Western Europe population (5-year peak mean 1991/2 - 1995/6)

Dunlin *Calidris alpina alpina*, 44,294 individuals representing up to 3.2% of the wintering Northern Siberia/Europe/Western Africa population (5-year peak mean 1991/2 - 1995/6)

Grey Plover *Pluvialis squatarola*, 3,825 individuals representing up to 2.5% of the wintering Eastern Atlantic - wintering population (5-year peak mean 1991/2 - 1995/6)



Redshank *Tringa totanus*, 1,788 individuals representing up to 1.2% of the wintering Eastern Atlantic - wintering population (5-year peak mean 1991/2 - 1995/6)

Ringed Plover *Charadrius hiaticula*, 846 individuals representing up to 1.7% of the wintering Europe/Northern Africa - wintering population (5-year peak mean 1991/2 - 1995/6)

Assemblage qualification: A wetland of international importance.

The area qualifies under **Article 4.2** of the Directive (79/409/EEC) by regularly supporting at least 20,000 waterfowl

Over winter, the area regularly supports 93,142 individual waterfowl (5 year peak mean 1991/2 - 1995/6) including: Wigeon *Anas penelope*, Bar-tailed Godwit *Limosa lapponica*, Dark-bellied Brent Goose *Branta bernicla bernicla*, Ringed Plover *Charadrius hiaticula*, Grey Plover *Pluvialis squatarola*, Dunlin *Calidris alpina alpina*, Black-tailed Godwit *Limosa limosa islandica*, Redshank *Tringa totanus*, Little Grebe *Tachybaptus ruficollis*, Little Egret *Egretta garzetta*, Shelduck *Tadorna tadorna*, Curlew *Numenius arquata*, Teal *Anas crecca*, Pintail *Anas acuta*, Shoveler *Anas clypeata*, Red-breasted Merganser *Mergus serrator*, Oystercatcher *Haematopus ostralegus*, Lapwing *Vanellus vanellus*, Knot *Calidris canutus*, Sanderling *Calidris alba*, Cormorant *Phalacrocorax carbo*, Whimbrel *Numenius phaeopus*.
ak mean 1998/9-2002/3).

Chichester and Langstone Harbours Ramsar (JNCC, 1987)

Ramsar criterion 5

Assemblages of international importance: Species with peak counts in winter: 76480 waterfowl (5-year peak mean 1998/99-2002/2003)

Ramsar criterion 6 – Species/populations occurring at levels of international importance.

Qualifying Species/populations (as identified at designation):

Species with peak counts in spring/autumn:

- Ringed plover *Charadrius hiaticula*, Europe / Northwest Africa 853 individuals, representing an average of 1.1% of the population (5-year peak mean 1998/9- 2002/3)
- Black-tailed godwit *Limosa limosa islandica*, Iceland/W Europe 906 individuals, representing an average of 2.5% of the population (5-year peak mean 1998/9- 2002/3)
- Common redshank *Tringa totanus totanus*, 2577 individuals, representing an average of 1% of the population (5-year peak mean 1998/9- 2002/3)

Species with peak counts in winter:

- Dark-bellied brent goose *Branta bernicla bernicla*, 12987 individuals, representing an average of 6% of the population (5-year peak mean 1998/9- 2002/3)
- Common shelduck *Tadorna tadorna*, NW Europe 1468 individuals, representing an average of 1.8% of the GB population (5-year peak mean 1998/9-2002/3)
- Grey plover, E Atlantic/W Africa -wintering 3043 individuals, representing an average of 1.2% of *Pluvialis squatarola* the population (5-year peak mean 1998/9-2002/3)



- Dunlin *Calidris alpina alpina*, W Siberia/W Europe 33436 individuals, representing an average of 2.5% of the population (5-year peak mean 1998/9-2002/3)

Species/populations identified subsequent to designation for possible future consideration under criterion 6. Species regularly supported during the breeding season:

Little tern *Sterna albifrons albifrons*, W Europe 130 apparently occupied nests, representing an average of 1.1% of the breeding population (Seabird 2000 Census).

River Itchen SAC (JNCC, 2015d)

There is one Annex I habitats present that are a primary reason for selection of this site:

- **3260** Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation.

There are two Annex II species that are primary reasons for selection of this site:

- **1044** Southern damselfly (*Coenagrion mercuriale*); and
- **1163** Bullhead (*Cottus gobio*).

There are four Annex II species present as a qualifying feature, but not a primary reason for site selection:

- **1092** White-clawed (or Atlantic stream) crayfish *Austropotamobius pallipes*;
- **1096** Brook lamprey *Lampetra planeri*;
- **1106** Atlantic salmon *Salmo salar*; and
- **1355** Otter *Lutra lutra*.

Solent Maritime SAC (JNCC, 2015e)

Annex I habitats that are a primary reason for selection of this site

1130 Estuaries

The Solent encompasses a major estuarine system on the south coast of England with four coastal plain **estuaries** (Yar, Medina, King's Quay Shore, Hamble) and four bar-built **estuaries** (Newtown Harbour, Beaulieu, Langstone Harbour, Chichester Harbour). The site is the only one in the series to contain more than one physiographic sub-type of estuary and is the only cluster site. The Solent and its inlets are unique in Britain and Europe for their hydrographic regime of four tides each day, and for the complexity of the marine and estuarine habitats present within the area. Sediment habitats within the estuaries include extensive estuarine flats, often with intertidal areas supporting eelgrass *Zostera* spp. and green algae, sand and shingle spits, and natural shoreline transitions. The mudflats range from low and variable salinity in the upper reaches of the estuaries to very sheltered almost fully marine muds in Chichester and Langstone Harbours. Unusual features include the presence of very rare sponges in the Yar estuary and a sandy 'reef' of the polychaete *Sabellaria spinulosa* on the steep eastern side of the entrance to Chichester Harbour.

1320 Spartina swards (Spartinion maritimae)

Solent Maritime is the only site for smooth cord-grass *Spartina alterniflora* in the UK and is one of only two sites where significant amounts of small cord-grass *S. maritima* are found. It is also one of the few remaining sites for Townsend's cord-grass *S. x townsendii* and holds extensive areas of common cord-grass *Spartina anglica*, all four taxa thus occurring here in close proximity. It has



additional historical and scientific interest as the site where *S. alterniflora* was first recorded in the UK (1829) and where *S. x townsendii* and, later, *S. anglica* first occurred.

1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae)

The Solent contains the second-largest aggregation of **Atlantic salt meadows** in south and south-west England. Solent Maritime is a composite site composed of a large number of separate areas of saltmarsh. In contrast to the Severn estuary, the salt meadows at this site are notable as being representative of the ungrazed type and support a different range of communities dominated by sea-purslane *Atriplex portulacoides*, common sea-lavender *Limonium vulgare* and thrift *Armeria maritima*. As a whole the site is less truncated by man-made features than other parts of the south coast and shows rare and unusual transitions to freshwater reedswamp and alluvial woodland as well as coastal grassland. Typical **Atlantic salt meadow** is still widespread in this site, despite a long history of colonisation by cord-grass *Spartina* spp.

Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site

- 1110 Sandbanks which are slightly covered by sea water all the time
- 1140 Mudflats and sandflats not covered by seawater at low tide
- 1150 Coastal lagoons * Priority feature
- 1210 Annual vegetation of drift lines
- 1220 Perennial vegetation of stony banks
- 1310 Salicornia and other annuals colonizing mud and sand
- 2120 "Shifting dunes along the shoreline with *Ammophila arenaria* ("white dunes")"

Annex II species present as a qualifying feature, but not a primary reason for site selection

- 1016 Desmoulin's whorl snail *Vertigo moulinsiana*

Solent and Dorset Coast pSPA (Natural England, 2016)

The proposal for Solent and Dorset Coast is to create a new SPA for internationally important populations of:

- Common tern *Sterna hirundo*
- Sandwich tern *Thalasseus sandvicensis*
- Little tern *Sternula albifrons*



Appendix D – Land at Newgate Lane, North Nutrient Balancing Calculations



Table 3: Calculating Total Nitrogen (TN) Load From Development Wastewater (Stage 1)

Step	Measurement	Value	Unit	Explanation
Development proposal.	Development types that would increase the population served by a wastewater system.	75.000	Residential dwellings	Number of dwellings.
1	Additional population.	180.000	Persons	Uses an average household size of 2.4 x number of dwellings.
2	Wastewater volume generated by development.	19800.000	L/day	Persons x 110 litres/day. Where relevant, deduct wastewater volume of population displaced by the proposed development.
3	Waste Water Treatment Works (WWTW) environmental limit for TN.	9.000	mg/l TN	Peel Common WwTW limit.
4	Deduct acceptable TN loading (@ 2 mg/l TN).	6.100	mg/l TN	90% of environmental limit. – 2 mg/l in accordance with NE guidance
5	TN discharged after WWTW.	120780.000	mg/TN/day	Step 2 x Step 4
6	Convert mg/TN to kg/TN per day.	0.121	Kg/TN/day	Divide by 1,000,000.
7	Convert kg/TN per day to kg/TN per year.	44.085	Kg/TN/yr	x365 days.
TN Load Wastewater 44.085 Kg/TN/yr				



Table 4: Calculating TN Load From Current Land use (Stage 2)

Step	Measurement	Farm type	Value	Unit	Explanation
1	Total area of existing land	Cereals No use	3.400 0.550	ha	Area of land lost to development
2	Nitrate loss.	Cereals No use	31.200 5.000	Kg/ha/yr	The existing land uses
3	Multiply total area by farm type nitrate loss	Cereals No use	106.080 2.750	Kg/TN/yr	Area x nitrate loss
TN Load – Current land use 108.830 Kg/TN/yr					

Table 5: Calculating TN Load From Future Land Uses (Stage 3)

Step	Measurement	Value	Unit	Explanation
1	Future urban land	3.370	ha	Area of development that will change from agricultural land to urban land use
2	Total nitrogen load from future urban area	48.191	Kg/TN/yr	area (ha) x 14.3 Kg/TN/yr (nitrogen leaching from urban land each year)
3	New SANG / open space	0.580	ha	Area of development that will change from agricultural land to SANG / open space
4	TN load from SANG / open space	2.900	Kg/TN/yr	area (ha) x 5 (nitrogen leaching from SANG / open space each year)
5	Combine TN load from future land uses	51.091	Kg/TN/yr	-
TN Load – Future land use 51.091 Kg/TN/yr				



Table 6: Calculating Net Change in TN from The Development (Stage 4)

Step	Measurement	Value	Unit	Explanation
1	Identify TN loads from wastewater	44.085	Kg/TN/yr	(Stage 1)
2	Calculate TN from land use - subtract TN load from future land uses (Stage 3) from existing land uses (Stage 2)	57.739	Kg/TN/yr	(Stage 2 - Stage 3)
3	Determine nitrogen budget - the difference between the TN load for the proposed development and the existing uses	-13.654	Kg/TN/yr	(Step 1 - Step 2)
4	Calculate and include 20% buffer (does not apply to neutral projects)	N/A	N/A	N/A
TN Budget -13.654 Kg/TN/yr				



Appendix E – Land at Newgate Lane, South Nutrient Balancing Calculations



Table 3: Calculating Total Nitrogen (TN) Load From Development Wastewater (Stage 1)

Step	Measurement	Value	Unit	Explanation
Development proposal.	Development types that would increase the population served by a wastewater system.	115.000	Residential dwellings	Number of dwellings.
1	Additional population.	276.000	Persons	Uses an average household size of 2.4 x number of dwellings.
2	Wastewater volume generated by development.	30360.000	L/day	Persons x 110 litres/day. Where relevant, deduct wastewater volume of population displaced by the proposed development.
3	Waste Water Treatment Works (WWTW) environmental limit for TN.	9.000	mg/l TN	Peel Common WwTW limit.
4	Deduct acceptable TN loading (@ 2 mg/l TN).	6.100	mg/l TN	90% of environmental limit. – 2 mg/l in accordance with NE guidance
5	TN discharged after WWTW.	166676.400	mg/TN/day	Step 2 x Step 4
6	Convert mg/TN to kg/TN per day.	0.185	Kg/TN/day	Divide by 1,000,000.
7	Convert kg/TN per day to kg/TN per year.	67.597	Kg/TN/yr	x365 days.
TN Load Wastewater 67.597 Kg/TN/yr				



Table 4: Calculating TN Load From Current Land use (Stage 2)

Step	Measurement	Farm type	Value	Unit	Explanation
1	Total area of existing land	Cereals	4.600	ha	Area of land lost to development
		Lowland Grazing	1.400		
2	Nitrate loss.	Cereals	31.200	Kg/ha/yr	The existing land uses
		Lowland Grazing	13.000		
3	Multiply total area by farm type nitrate loss	Cereals	143.520	Kg/TN/yr	Area x nitrate loss
		Lowland Grazing	18.200		
TN Load – Current land use 161.720 Kg/TN/yr					

Table 5: Calculating TN Load From Future Land Uses (Stage 3)

Step	Measurement	Value	Unit	Explanation
1	Future urban land	4.730	ha	Area of development that will change from agricultural land to urban land use
2	Total nitrogen load from future urban area	67.639	Kg/TN/yr	area (ha) x 14.3 Kg/TN/yr (nitrogen leaching from urban land each year)
3	New SANG / open space	1.270	ha	Area of development that will change from agricultural land to SANG / open space
4	TN load from SANG / open space	6.350	Kg/TN/yr	area (ha) x 5 (nitrogen leaching from SANG / open space each year)
5	Combine TN load from future land uses	73.989	Kg/TN/yr	-
TN Load – Future land use 73.989 Kg/TN/yr				



Table 6: Calculating Net Change in TN from The Development (Stage 4)

Step	Measurement	Value	Unit	Explanation
1	Identify TN loads from wastewater	67.597	Kg/TN/yr	(Stage 1)
2	Calculate TN from land use - subtract TN load from future land uses (Stage 3) from existing land uses (Stage 2)	87.731	Kg/TN/yr	(Stage 2 - Stage 3)
3	Determine nitrogen budget - the difference between the TN load for the proposed development and the existing uses	-20.134	Kg/TN/yr	(Step 1 - Step 2)
4	Calculate and include 20% buffer (does not apply to neutral projects)	N/A	N/A	N/A
TN Budget -20.134 Kg/TN/yr				



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