



GOSPORT
Borough Council

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Ms Jean Chambers
Principal Planner (Development Management)
Fareham Borough Council

Dear Ms Chambers,

Our Reference. D.11/003/19

Your reference: P/19/0460/OA

**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
Land At Newgate Lane (South) Fareham Hampshire**

Thank you for your recent consultation to Gosport Borough Council as the neighbouring Planning Authority to the above application. The Council has resolved to **RAISE OBJECTION** in the strongest possible terms on the following grounds:

1. Encroachment into the Strategic Gap contrary to Fareham Local Plan and loss of valuable green infrastructure.
2. Potential to negate benefits of recent improvements to Newgate Lane East intended to improve access to the Solent Enterprise Zone at Daedalus and the wider Gosport peninsula to address existing infrastructure deficiencies.
3. Site is poorly served by public transport and would be heavily car dependant, the use of which may adversely impact the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road.

The site comprises agricultural land and is located within the 'Strategic Gap' as identified in the Fareham Local Plan. The Strategic Gap separates the settlements of Fareham, Gosport, Stubbington and Lee-on-the-Solent and the planning application is therefore contrary to the statutory development plan, The Fareham Core Strategy. Policy CS22 of The Fareham Core Strategy, "Development in Strategic Gaps" states that 'development proposals will not be permitted either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of the settlements'. This proposal by its sheer scale and location will undoubtedly harm the integrity of the gap

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and will diminish the physical and visual separation of the settlements. The importance of gaps are recognised at a sub-regional level in the PUSH Spatial Position Statement (2016). Statement S1 of the PUSH Spatial Position Statement recognises gaps between settlements are important in maintaining a sense of place, settlement identity and the countryside setting for local communities. It is also recognised that gaps are important for delivering effective transport corridors, recreation uses and environmental mitigation.

Gosport Borough Council has identified the Settlement Gap between Fareham, Gosport, Stubbington and Lee-on-the Solent in its statutory development plan, the Gosport Local Plan (2011-2029) adopted in October 2015. It is considered that this Gap which spans land within both Fareham Borough Council and Gosport Borough Council fulfils a very important function in separating these communities in order that they retain their own identity and local distinctiveness.

In addition, this Strategic Gap is an important component of green infrastructure which serves existing communities and those developments that are already planned in development plans. The proposed development would diminish the opportunities to make the optimum use of this green infrastructure particularly in providing green linkages from Fareham to the coast via the Alver Valley Country Park.

The proposal also has the significant potential to negate the benefits being provided by the highway improvements at Newgate Lane East by adding additional traffic onto Newgate Lane. This will have an associated negative impact on traffic flows, increasing congestion to the detriment of Gosport residents and the local economy including accessibility to the Solent Enterprise Zone at Daedalus.

The proposal would be very car dependent with little provision for public transport. This would exacerbate the amount of trips using Newgate Lane. Any additional traffic on Newgate Lane is likely to also have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and this may be difficult to mitigate given the scale of the allocation and limited public transport choice.

It is important to emphasise that this proposal alone, and in combination with other housing proposals in the strategic gap, will significantly undermine the ability of the transport routes to function effectively including the recently improved Newgate Lane and the approved Stubbington Bypass. Specific consideration needs to be given to the acute transport and wider economic regeneration issues facing Gosport Borough and the need to understand the impact this development would have on the economic performance of the Borough.

The Gosport Peninsula has no mainland rail services and limited choices of road routes to and from the Peninsula. It has the lowest job density in the South East which results in high levels of out-commuting placing tremendous pressure on the road system. This in turn affects the attractiveness of Gosport as a place to invest and the ability to retain existing growing businesses.

Linked to the employment issue there has been a significant rationalisation of MoD and other Government sites in the Borough resulting in the release of very complex Brownfield sites, with further releases proposed. Many of the sites include nationally important heritage assets. These sites offer the potential of a mix of uses including housing development. Any remaining limited capacity on the routes to, and from, Gosport needs to be available to regenerate the Borough's Brownfield sites and stimulate its economy. New housing developments that are immediately adjacent these routes will impede Gosport's ability to do this and to gain access to the wider South Hampshire economy. The

development of Greenfield sites in the strategic gap significantly undermines the PUSH Principle A which aims to maximise development potential within urban areas and minimise Greenfield land take. This proposal is therefore considered of strategic significance and indeed has the potential to undermine the overall South Hampshire strategy outlined in the PUSH Spatial Position Statement.

In addition to Policy CS22 of the Fareham Local Plan the proposal is also contrary to Policy CS6- *the Development Strategy*, which states that development will prioritise the re-use of previously developed land within the defined urban area boundaries. This site is a greenfield site outside of the urban area. This proposal is therefore contrary to the Council's long term development strategy. Similarly CS11- *Development in Portchester, Stubbington and Hillhead, and Titchfield* states that small scale development will be permitted within their respective settlement boundaries. This proposal is not small scale nor within the settlement boundary of Stubbington.

CS14 clearly states that built development on land outside the defined settlement will be strictly controlled to protect the countryside from development which would affect its landscape character, appearance and function. A development in this location as stated above would affect the sub-regional strategic function of the strategic gap which aims to maintain a functional gap and visual separation between settlements.

Policy DSP6 of Part 2 of the Local Plan also presumes against development outside of the defined urban boundary. The only exceptions relate to very small scale levels of development of one or two dwellings as infill.

Policy DSP40 relating to housing allocations, of which this site is **not** included, recognises that in certain circumstances where it can be demonstrated that the Council does not have a five year supply of housing, additional sites outside of the urban area boundary may be permitted where they meet **all** of the criteria set out. Consequently whilst acknowledging that Fareham Borough may not currently have a five year land supply it is clear that this particular proposal does not meet all the criteria set out in Policy DSP40. Firstly it is **not** sustainably located adjacent to, and well related to, the existing urban settlement boundaries and cannot be well integrated with the neighbouring settlement as required by criterion ii.

With regard to this point it is clear that this site is poorly sited in relation to adjacent urban areas representing an outlier in the strategic gap, poorly served by public transport and services.

Criterion iii requires that proposals are sensitively designed to reflect the character of neighbouring settlement and to minimise the impact on Strategic Gaps. It is clear that this proposed development would impact on the long standing objectives of the strategic gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington and significantly diminish its function.

Criterion v requires that the site would not have any unacceptable environmental, amenity and traffic implications. The Council considers that the proposed development of this site together with the current outstanding application immediately to the north will negate the benefits of the proposed Newgate Lane improvements and consequently would be contrary to Policy DSP40.

It is noted that the Interim Transport Assessment for the previous Draft Fareham Local Plan (Oct 2017) recognises that the current Volume over Capacity (v/c) exceed 100% in the PM peak on Newgate Lane and is approaching available practical capacity in the AM

peak resulting in significant congestion. Consequently it is already recognised that traffic exceeds the available capacity on this strategic route. Table 1 summarises information from this document which highlights that this situation is predicted to worsen over the period to 2036 and consequently the report recognises that Newgate Lane will experience *'more noticeable increases in traffic flow.'*

Table 1: Road capacity on Newgate Lane

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

*1 including Stubbington Bypass and Newgate Lane improvements

*2 this does not include any potential growth in Gosport Borough arising from the Gosport Borough Local Plan Review

This assessment does not include the two applications currently outstanding between Newgate Lane and Newgate Lane East, nor does it include other speculative developments such as the outstanding Newlands Farm application. No work has been undertaken to assess the cumulative impact of the numerous speculative development coming forward in the Strategic Gap. Importantly the figure in Table 1 does not make provision for the forthcoming brownfield development in Gosport Borough for which it is sub regional policy to develop before greenfield developments are considered.

As required by criterion v of DSP40 it is necessary to ensure that there are no significant environmental impacts. Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road particularly as there is very limited transport choice serving this site.

Consequently whilst Fareham Borough may not currently have a five year housing supply there are numerous non-residential policies in the adopted Fareham Local Plan that are still very much relevant and up-to-date.

I trust these comments will be taken into consideration.

Yours sincerely


Simon Barnett
Development Manager

Dated: 17th June 2019