

Appendix 1: Gosport Borough Council's detailed representations to the Fareham Local Plan: Supplement (February 2020)

The detailed comments, summarised in the attached letter, are set out below and form part of Gosport Borough Council's representation to the Fareham Local Plan 2036.

1 Development Strategy

- 1.1 Whilst the principles of good growth are supported it is considered that the proposed development strategy does not represent 'good growth' for the residents of Gosport Borough nor those of Fareham Borough particularly those in Stubbington and Hillhead and those living in Fareham itself, including those within or in close proximity to the Air Quality Management Areas.
- 1.2 The proposed HA2 allocation and the Strategic Growth Area, with limited transport choice, will exacerbate existing traffic congestion issues associated with the Gosport Peninsula and increase air pollution to the detriment of local residents. It will hamper economic opportunities and investment potential within Gosport Borough.
- 1.3 The plan fails to consider cross-boundary issues and should recognise the importance of the long-established Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington.
- 1.4 The Development Strategy does not acknowledge the issues relating to the transport issues on the Gosport Peninsula. The existing boundaries of the Strategic Gap should be retained in order to maintain an effective transport corridor through the gap. Additional development immediately adjacent and accessing the route will negate all the benefits of the recently improved and commenced road infrastructure. This investment has been implemented to address existing deficiencies not facilitate new development. These issues are expanded further in the following sections.

2 Housing

Unmet need

- 2.1 It is acknowledged that the Fareham Local Plan: *Supplement* recognises that it may likely have to address the unmet need from neighbouring authorities and consequently the overall housing figure will have to be confirmed.

- 2.2 It is considered that the issue of unmet need is a very important matter to address on a sub-regional basis as a number of local authorities, including Gosport Borough, have a dense urban character and collectively have a significant housing requirement when using the Government's standardised methodology. It is important to recognise that in order to create sustainable communities across South Hampshire it is necessary to ensure that: there is sufficient land for employment to create local jobs and reduce out-commuting and congestion; there are genuine, affordable and convenient public transport choices; and there is sufficient quality open spaces to meet environmental, recreational and health needs. Consequently the Council supports the joint working initiative of the PFSH Statement of Common Ground and the evidence which will lead to a shared spatial strategy. This will identify the most appropriate locations within the sub-region for new growth to 2036 and ideally towards 2050 to ensure comprehensive long-term good planning for the sub region. As part of the evidence several broad areas across South Hampshire will be independently assessed regarding their suitability for large scale development considering environmental and infrastructure factors. These will be known as Strategic Development Opportunity Areas (SDOAs).
- 2.3 The Fareham Local Plan identifies two Strategic Growth Areas (SGAs) which could potentially meet sub-regional unmet need. These are: an Area north of Downend near Wallington; and the area South of Fareham. This Council objects to the SGAs particularly the South Fareham SGA on the basis that the sub regional work has yet to be completed on potential SDOAs. Further details are set out later within these representation.

Five year housing supply policy

- 2.4 The FLP: *Supplement* includes a five year housing land supply policy which states that where it can be demonstrated that the Council does not have a five year supply of land for housing against the requirements set out in the Local Plan, additional housing sites outside the urban area boundary may be permitted where they meet certain criteria including:
- The proposal is relative in scale to the demonstrated five year housing land supply shortfall;
 - It is sustainably located adjacent to, and well related to, the existing urban area boundaries and can be well integrated with the neighbouring settlement;
 - The proposal is sensitively designed to reflect the landscape character and setting of the settlement and to minimise any adverse impact on the countryside and, if relevant the Strategic Gaps.
- 2.5 The Council objects to this policy as it implies that if Fareham's five year housing supply is not met the first area of search is outside of the urban area boundary. Instead the policy should refer to sites within urban areas, brownfield land, underutilised employment sites, sites close to train stations, under-utilised town centre sites such as car parks and shopping precincts, consideration of using Council land assets and other public sector land, intensification of existing neighbourhoods, as well as opportunities to increase densities on existing allocations such as

Welborne. These types of sites should be clearly identified as being preferential before greenfield land outside the urban area, particularly within the Strategic Gap, are considered.

- 2.6 The Council also objects to the criterion relating to strategic gaps which is also covered in more detail later in this representation.

3 Housing Allocations and maintaining an objection to the HA2 allocation

Newgate Lane South residential allocation (HA2)

- 3.1 The *Supplement* states it is not re-consulting on the proposed allocation in the DFLP (2017) which included the Newgate Lane South allocation known as HA2. However as this site remains identified as an allocation and there has been no additional evidence to address any of the Council's substantial concerns it is proposed that the Council reiterates the comments made previously on this matter.
- 3.2 The proposed allocation is located on the western boundary of the Borough, with Tukes Avenue and other residential roads (Heron Way, Pettycot Crescent) to the east; and the new route of Newgate Lane to the west. The HMS Collingwood playing fields are situated to the north and the Brookers Field recreation ground to the south. The key concerns are re-iterated in Annex A and form part of this Council's representations to this latest document.
- 3.3 The Council would also like to make additional comments on this allocation. It is noted that the latest SHELAA provides the housing and employment land availability position within Fareham Borough as at 1st December 2019 and forms an integral part of the evidence base that underpins the Fareham Local Plan 2036.
- 3.4 The HA2 allocation is identified as three component parts in the document. With regard to the southern site it clearly recognises that the introduction of junctions along Newgate Lane South Relief Road would interfere with the free-flow of traffic which the Relief Road now provides. It adds that, *'as this and all other access would interfere with traffic flows, it is considered development of the site would be unsatisfactory. It would be feasible to develop the western part of the site from the existing Newgate Lane and incorporate measures to improve/relieve Woodcote Lane.'*
- 3.5 Similarly with regard to the middle site the potential for access to Newgate Lane South through the construction of a roundabout is considered unsatisfactory and a revised option would need to be explored and that the identification of a suitable highway access is pending.
- 3.6 With regard to the northern site it states that suitable highway access has been identified onto Tukes Avenue. This Council would like to understand where this access is located as this has not been identified in the FLP: *Supplement*. It is important to note that an erratum was issued to the DFLP (2017) which withdrew the original proposed access onto Tukes Avenue

as local homeowners had not been informed or had given their permission for an access.

- 3.7 It is recognised that the SHELAA is an evidence study not a policy document however it is necessary to understand whether FBC are proposing to amend the HA2 policy. There are no proposed changes identified in the FLP: *Supplement* and the policy included in the DFLP 2017 referred to access off Newgate Lane whereas the evidence in the SHELAA identifies significant problems with access off Newgate Lane. This Council and HCC objected to the proposed allocation being accessed off Newgate Lane due to the detrimental impact that 475 dwellings directly onto the recent road improvements would have on north-south movements on the strategic transport corridor.
- 3.8 The Council maintains an objection on highway and accessibility grounds due to the impact that 475 dwellings would have on the residential roads of Bridgemary. No evidence is provided on the scale of this impact nor are there any details provided on the potential access routes.
- 3.9 In the light of this the Council maintains its objection to the HA2 allocation due to these accessibility issues (together with the other reasons set out in Annex A) and would also question whether the development is actually deliverable.

4 Strategic Growth Areas

- 4.1 The Development Strategy recognises that FBC has an obligation to work with neighbouring authorities in order to identify and address unmet need within the region. PfSH are working on a Statement of Common Ground to identify Strategic Development Opportunity Areas (SDOAs) that could be selected to meet the unmet needs in the sub-region. This work will continue through 2020 with a final presentation to PfSH Joint Committee in early 2021. FBC states that it will be an active partner in these discussions and that the Publication (Reg. 19) version will need to address unmet need.
- 4.2 The Council strongly objects to the Strategic Growth Area based on two principles which are set out fully in the rest of this section:
- 1) They pre-judge the work currently being undertaken by PfSH regarding the most appropriate Strategic Development Opportunity Areas and that this work should be concluded before any SGAs are identified.
 - 2) That the South of Fareham SGA fails to acknowledge the previous concerns made by Gosport Borough Council regarding: the issues concerning HA2; the need to preserve a transport corridor to, and from, the Peninsula; and the need to maintain a strategic gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington and that any significant development would affect the long established integrity and function of the Strategic Gap.

1) PfSH work

- 4.3 The PfSH work on SDOAs is in the process of being procured in which an independent consultant will consider the appropriateness of a number of sites to deliver housing need in South Hampshire to 2036 and beyond. This includes a number of broad areas across South Hampshire as well as the potential to intensify development on currently identified major development areas.
- 4.4 It is considered necessary for the findings of this work to be concluded and an approach agreed by PfSH Joint Committee before these Strategic Growth Areas are identified. The identification of SGAs could prejudice this work and fails to recognise this Council's significant concerns regarding the South Fareham SGA. Alternative sites may be more suitable and if the SGAs are already identified in an emerging Fareham Local Plan there may be reluctance to bring these sites forward in other parts of the sub region.
- 4.5 For example there may be opportunities to increase the residential quantum at Welborne itself by increasing densities. Even marginal density increases in areas where the current proposed densities are 'up to 30 dwelling per hectare' (dph) and 'up to 35 dph' could yield significant increases in the number of dwellings at this site.
- 4.6 By considering further options for a railway halt at Welborne would also facilitate higher densities. Given the restricted supply of land in the South Hampshire sub-region building at exceptionally low densities would represent a missed opportunity as the PfSH authorities plan forward to 2036 and onto 2050. Such increases in densities would make public transport and other facilities more viable and would also reduce the need to develop in the Fareham, Gosport, Lee-on-the-Solent, and Stubbington (FGLS) Strategic Gap.
- 4.7 It is clear from the NPPF that planning policies and decisions should support development that makes efficient use of land. It states that where there is an existing or anticipated shortage of land for meeting identified housing needs it is especially important that planning policies and decisions avoid homes being built at low densities and ensure the developments make optimal use of the potential for each site.

2) Specific issues regarding the South Fareham SGA

- 4.8 It is clear that the Fareham SGA policy will affect the function and integrity of the Strategic Gap which has previously been agreed by both Councils and undermines the sub regional objectives of maintaining a Strategic Gap. Such development will have a detrimental impact on existing residents in Gosport, Lee-on-the-Solent, Stubbington, Hillhead and southern Fareham.
- 4.9 There is currently no detailed evidence available regarding the scale of development proposed and consequently the likely impacts on traffic generation, infrastructure and the environment. Whilst it is recognised that this is difficult at this stage as the overall quantum is not yet known it would

be useful to have an understanding of whether various environmental and infrastructure constraints have been considered.

- 4.10 Some of the Council's key concerns relating to the Strategic Growth Area relate to the principles of developing in the FGLS Strategic Gap and are detailed further below:
- Transport and Accessibility
 - Air quality
 - The principle of maintaining a Strategic Gap to prevent coalescence and protect the identity of settlements.
 - Protecting the Strategic Gap to deliver multi-functional benefits for local communities
- 4.11 ***Transport and accessibility:*** One of the Council's primary concerns is the impact of potential new development, including any additional allocations in the SGA and the proposed HA2 allocation, will have on the effectiveness of the strategic transport corridor through the existing Strategic Gap. It is considered that any allocations which have access directly onto the recently improved Newgate Lane and the proposed Stubbington Bypass will negate the benefits these proposals will deliver to improve access to, and from, the Peninsula.
- 4.12 These improvements are aimed at addressing existing acute transport infrastructure deficiencies, not to enable development on greenfield sites directly adjacent to the routes. Instead this improved infrastructure can bring regeneration benefits to difficult brownfield sites in Gosport and make them more attractive to investors. The NPPF is very clear that policies should promote the development of under-utilised land and buildings especially if this would help to meet identified needs for housing where land supply is constrained.
- 4.13 The issue of maintaining an effective transport corridor is imperative for Gosport's future prosperity. The Stubbington Bypass route is the only opportunity to improve vehicular access to the Borough. If the benefits of the Stubbington Bypass are negated by significant development being built with access directly onto the Bypass, this last opportunity would be lost and there would be a real sense that Gosport has been 'blocked in'.
- 4.14 This would perhaps be less significant if Gosport had its own railway station and had a reasonable job density rate with limited out-commuting. However this is certainly not the case.
- 4.15 Gosport has the lowest job density in the South East of England and one of the lowest in England at only 0.5 jobs per resident person of working age. Such a low job density has significant implications for the Borough including the considerable scale of daily out-commuting which puts tremendous pressure on the existing road system resulting in acute traffic congestion and high levels of air pollution as evidenced in the Air Quality Management Areas identified within Fareham Borough at the north end of the Peninsula. This congestion results in the road network reaching full capacity and an extended peak time spreading on key routes. This actual

congestion as well as the wider perception of congestion that exists can act as a disincentive for business and employment investment. Gosport has limited transport options with no fixed rail link and hence the effectiveness of the small number of road routes from Gosport is even more important.

4.16 Specific accessibility issues relating to the SGA and Newgate Lane East It is likely that a significant proportion of traffic from any development in the SGA will require access along Newgate Lane towards Fareham Town Centre. It is important to recognise that Newgate Lane East and other associated improvements were designed to achieve the following:

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

4.17 These objectives would be undermined by potential development within a SGA. It was not intended that the strategic highways improvements would facilitate new housing development. Gosport Borough Council is very concerned that development within the SGA, together with HA2, will have a detrimental impact on the existing significant congestion problems on the Gosport Peninsula and detract from recent and proposed improvements that aim to improve traffic flow to, and from, the Peninsula. This is critical for the future economic prosperity of the Borough including achieving the full potential of the Enterprise Zone.

4.18 The earlier DFLP was accompanied by an Interim Transport Assessment for the DFLP allocations (Oct 2017) which recognises that the current Volume over Capacity (v/c) exceed 100% in the PM peak on Newgate Lane and is approaching available practical capacity in the AM peak resulting in significant congestion. Consequently, it is already recognised that traffic exceeds the available capacity on this strategic route. Table 2 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 2: 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

- 4.19 With any further allocations within this area this situation would be exacerbated still further plus it will be necessary to take into account the additional allocations being put forward as part of the emerging work for the Gosport Borough Local Plan 2036.
- 4.20 The latest transport modelling work suggests numerous junctions in the area will suffer from severe or significant impacts over the period to 2036 when just taking into account existing permissions and adopted Local Plan allocations. This work incorporates committed transport schemes (such as the Stubbington Bypass). This situation is further exacerbated by the proposed Fareham Local Plan allocations and does not appear to have included any proposed development in the SGA, as the potential quantum of development is not yet known. It is clear however that any development in the SGA would have a detrimental impact on an already severely congested network on the Peninsula. Further work is to be undertaken as part of a Transport Assessment which will consider if there are any appropriate mitigation measures. This strengthens the case that such a designation should await the outcome of the aforementioned PfSH work as there are likely to be more appropriate locations for major development which have genuine transport choices in less congested parts of the sub-region or beyond. The PfSH work will include transport modelling work.
- 4.21 **Potential impact on the effectiveness of the Stubbington Bypass:** It is important to note that the DFLP (2017) stated in paragraph 11.46 that the Stubbington Bypass is not being provided with an intention of serving or facilitating additional new homes.
- 4.22 The DFLP recognised that this route forms part of Hampshire County Council's plan for improving access to Fareham and Gosport and seeks to ease congestion, improve safety and the area's economic prosperity by encouraging investment and regeneration, including at the Solent Enterprise Zone at Daedalus. The accompanying text in the DFLP acknowledged this will create a reliable route for traffic wishing to travel from the Gosport Peninsula westwards towards the M27 at Junction 9, in conjunction with recently completed works at St Margaret's Roundabout on the A27, and works underway to upgrade the A27 between the Titchfield Gyratory and Segensworth to two lanes in both directions. It stated that the bypass is not being provided with an intention of serving or facilitating additional new homes. GBC consider that FBC's position in the DFLP is still valid and should be maintained. There is currently no information available regarding the impact that the SGA will have on the effectiveness of the Stubbington Bypass and how development will be accessed.
- 4.23 **Air quality:** Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and therefore it would be necessary to include measures mentioned in Policy INF2 of the DFLP which promotes sustainable transport to mitigate this impact. This is likely to be difficult for allocations in the Strategic Gap of this scale with limited public transport choice.

- 4.24 **The principle of maintaining a Strategic Gap to prevent coalescence and protect the identity of settlements:** The Strategic Gap is identified in the GBLP (Policy LP3) and FBC's current Local Plan (Policy CS22 of the Core Strategy). GBC and FBC have worked collaboratively in the past to define the boundaries of the Strategic Gap and have been successful in maintaining a functional gap and visual separation between the settlements.
- 4.25 The *Supplement* consultation is a significant change in the long-established position as it appears to accept large-scale development in the Strategic Gap. This Council strongly opposes this change in approach and considers that the additional residential proposals will have a significant and detrimental impact on the current form and function of the Strategic Gap and no amount of 'careful planning' would be able to mitigate these impacts.
- 4.26 The sub-regional PUSH Spatial Position Statement states that Councils should identify in their Local Plans strategic countryside gaps of sub-regional importance and that these gaps are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. It recognises that gaps can provide the space for necessary uses such as recreation areas, transport corridors and environmental mitigation.
- 4.27 FBC's current Policy CS22 states that '*development proposals will not be permitted either individually or cumulatively where it significantly affects the integrity of the gap and the physical and visual separation of the settlements*'. The Policy recognises that maintaining separation will prevent coalescence of the settlements in this densely settled part of South Hampshire.
- 4.28 The justification text states that gaps between settlements help define and maintain the separate identity of individual settlements and have strong local support. It adds that Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. It acknowledges that continuing pressure for high levels of development mean that maintaining gaps continues to be justified.
- 4.29 It is considered the text of Policy CS22 remains relevant in relation to the strategic gap. Indeed the current boundary has been supported by a Planning Inspector as recently as May 2015. In his report into the Examination in Public for the Fareham Local Plan Part 2, the Inspector refers to FBC's evidence regarding the review of Strategic Gaps and states,

'although the review did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. Having visited the area I agree with the Council that the gap between Fareham and Stubbington is justified in order to retain visual separation and that

the proposed road improvements would not justify a revision to the boundary. The Council's approach is sound.'

- 4.30 The DFLP (2017) also included a policy relating to Strategic Gaps (Policy SP6) which continues to prevent the coalescence of urban areas and to maintain the separate identity of settlements. It also identified a Strategic Gap between *'Fareham/Bridgemark and Stubbington/Lee-on-the-Solent'*. It stated, *'development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements.'* The justification text acknowledged that, *'retaining the open farmland gap between Fareham and Stubbington is critical in preventing the physical coalescence of these two settlements together with maintaining the sense of separation'*. It also clearly stated in Paragraph 4.39 that, *'further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemark along with maintaining the separate identity of Peel Common.'* This Council agrees that this gap should be maintained.
- 4.31 Allocations in the Strategic Gap would also contradict FBC's own evidence which seeks to protect the strategic gap as set out in the Fareham Landscape Assessment (2017) which incorporates a review of the Strategic Gap.
- 4.32 The Council's previously mentioned comments relating to the Woodcot area which includes the land covered by the proposed HA2 Newgate Lane allocation are re-iterated in Annex A of this representation. The study also includes a character area which relates to the gap between Fareham and Stubbington covered by the SGA. There is a specific section on the Review of the Strategic Gap Designation. It concludes,
- 'This area is a cohesive agricultural landscape which performs multiple roles in respect of the primary and secondary purposes and functions of the Strategic Gap. Even minor encroachment beyond the existing, strong settlement boundary along the southern edge of Fareham could potentially disrupt local settlement pattern and character and have an adverse effect on the Gap functions and the overall integrity of the agricultural landscape. There may be some scope for very modest 'rounding off' of Stubbington on its northern edges, within existing parcels of land where development could be integrated without unacceptable impacts. Overall, however, it is recommended that the Gap boundaries remain tightly drawn around the existing settlement edges, with allowance for development only in exceptional circumstances where the purposes and integrity of the Gap can be maintained and significant GI and other benefits would result.'*
- 4.33 The Council agrees with the findings of the Study regarding the importance of the Fareham/Stubbington Gap area to be maintained. These findings also raise the question whether there may be preferable locations for very limited allocations here before the HA2 allocation is considered as the evidence on the Woodcot area concludes,

‘Even minor encroachment beyond existing settlement boundaries could have an adverse effect on these functions and the overall integrity of the landscape and Strategic Gap. It is recommended that the Gap boundaries remain unchanged.’

- 4.34 Gosport Borough Council agrees with these findings set out in the Fareham Landscape Assessment and considers that these areas should remain an integral part of the Strategic Gap fulfilling their current function.
- 4.35 Whilst recognising that circumstances have changed in terms of the need to accommodate additional housing numbers it is considered that there is an even stronger imperative to protect these important strips of land between settlements in the form of the Strategic Gap which certainly continue to perform the long-established planning function that both Councils have worked together to protect.
- 4.36 It is also recognised that the local plan process is the appropriate time to review such designations, however it is considered that the proposed changes will affect the integrity of the remaining gap by significantly reducing its width. This and other proposed residential allocations by their sheer scale will undoubtedly harm the character of the gap and will diminish the physical and visual separation of the settlements.
- 4.37 **Protecting the Strategic Gap to deliver multi-functional benefits for local communities:** This Council proposes that we work together with FBC bilaterally and as part of PfSH to find a long-term strategy for the strategic gaps which serve a number of existing functions that could be further diversified. These functions include:
- Strategic transport corridor for critical road infrastructure to, and from the Peninsula including the recent Newgate Lane improvements and the Stubbington Bypass.
 - The Daedalus employment areas which have been designed to reflect the character of this part of the Gap
 - Utilities including the Peel Common Waste Water Treatment Works
 - Sustainable power - Solar farms and IFA2
 - Recreational land to improve cycle and walking routes to facilitate countryside access between the communities and links with Titchfield and the Meon Valley.
 - Land for environmental mitigation
 - Land required for nitrate mitigation
 - Land required to deflect recreational pressure from sensitive coastal habitats and/or create Brent Goose refuges to allow development to take place in more sustainable locations
 - Land required for biodiversity net gain
 - Land required for carbon storage

- Maintaining local food production

4.38 Therefore as part of resolving the outstanding issues, to be set out in the Statement of Common Ground, that FBC considers the option of establishing a multi-functional corridor which includes the various uses set out above. It is considered appropriate that the agreed joint long term strategy would include the whole strategic gap including areas within Gosport Borough to ensure that recreational and environmental benefits are taken together.

5 **The Natural Environment**

Climate Change Policy

5.1 The climate change policy promotes a mitigation and adaptation to climate change through amongst other things, a development strategy that minimises the need to travel by allocating sites and generally directing development to locations with better services and facilities, or where they are capable of being improved. This Council disputes that the overly flexible approach being promoted by the five year housing land policy, which presumes in favour of out of settlement sites when there is no five year housing supply, is consistent with this Policy. Similarly the proposed SGA policy will exacerbate travel by private car. It is considered that the PfSH work on SDOAs across South Hampshire needs to consider the most sustainable locations for development first.

Air quality policy

5.2 Similarly it is difficult at this stage to envisage how the proposals in the existing Strategic Gap including the HA2 allocation and the potential in Strategic Growth Area can meet the requirements of the proposed air quality policy. This states that development will be permitted if it positively contributes towards the delivery of the Council's Air Quality Action Plan by mitigating the effects of development on air quality within the Air Quality Management Areas and/or any Clean Air Zones. Given that the HA2 and any SGA sites will be largely car borne with a significant proportion of traffic using Newgate Lane it is difficult to understand how these will positively contribute to the air quality with in the AQMA at Quay Street.

Annex A: Re-iteration of comments made to the Draft Fareham Local Plan (2017) relating to the Newgate Lane South allocation

- That this Council maintains its objection in full to the proposed residential allocation at Newgate Lane (referred to in the previous Draft Fareham Local Plan (DFLP) (2017) as HA2) for the reasons set out below:
 - The proposal would physically and visually diminish the long-established Strategic Gap between Fareham, Gosport, Lee-on-the-Solent and Stubbington;
 - The proposal will negate the benefits provided by the recent improvements to Newgate Lane with a negative impact on traffic flow and increased congestion to the detriment of Gosport residents and the local economy including accessibility to the Solent Enterprise Zone at Daedalus;
 - The proposal will significantly harm the amenities of local Gosport residents with the introduction of new access points to existing residential areas, which due to the scale of the proposal would lead to a significant increase of traffic on residential roads;
 - The proposal, as previously described in the DFLP is very car dependent with no provision for public transport. This would exacerbate the number of trips using Newgate Lane;
 - There is insufficient information on supporting infrastructure required including education, medical and community facilities.

Further details are set out below:

- | | |
|----|--|
| | <i>Strategic Gap</i> |
| A1 | In order to accommodate the Newgate Lane residential allocation the DFLP proposes to amend the Strategic Gap between <i>'Fareham/Bridgemark and Stubbington/Lee-on-the-Solent'</i> , which is identified in the GBLP (Policy LP3) and FBC's current Local Plan (Policy CS22 of the Core Strategy). GBC and FBC have worked collaboratively in the past to define the boundaries of the Strategic Gap and have been successful in maintaining a functional gap and visual separation between the settlements. |
| A2 | The sub-regional PUSH Spatial Position Statement states that Councils should identify in their Local Plans strategic countryside gaps of sub-regional importance and that these gaps are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities. It recognises that gaps can provide the space for necessary uses such as recreation areas, transport corridors and environmental mitigation. |
| A3 | FBC's current Policy CS22 states that <i>'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'</i> . The Policy recognises that maintaining separation will prevent coalescence of the settlements in this densely settled part of South Hampshire. |

A4 The justification text states that gaps between settlements help define and maintain the separate identity of individual settlements and have strong local support. It adds that Strategic Gaps do not necessarily have intrinsic landscape value but are important in maintaining the settlement pattern, keeping individual settlements separate and providing opportunities for green infrastructure/green corridors. It acknowledges that continuing pressure for high levels of development mean that maintaining gaps continues to be justified.

A5 It is considered that this remains relevant in the case of the Newgate Lane area. Indeed the current boundary has been supported by a Planning Inspector as recently as May 2015. In his report into the Examination in Public for the Fareham Local Plan Part 2, the Inspector refers to FBC's evidence regarding the review of Strategic Gaps and states,

'although the review did not specifically take into account the route of the Stubbington by-pass and the Newgate Lane improvements, there is no reason to conclude that these proposals would justify altering the boundary of the gap in those locations. Having visited the area I agree with the Council that the gap between Fareham and Stubbington is justified in order to retain visual separation and that the proposed road improvements would not justify a revision to the boundary. The Council's approach is sound.'

A6 The latest DFLP also includes a policy relating to Strategic Gaps (Policy SP6) which continues to prevent the coalescence of urban areas and to maintain the separate identity of settlements. It also identifies a Strategic Gap between 'Fareham/Bridgemark and Stubbington/Lee-on-the-Solent'. It states, *'development proposals will not be permitted where they cause severe adverse harm to the physical and visual separation of settlements'*. The justification text acknowledges that, *'retaining the open farmland gap between Fareham and Stubbington is critical in preventing the physical coalescence of these two settlements together with maintaining the sense of separation'*. It also clearly states in Paragraph 4.39 that, *'further to the east, retaining the gap will help maintain the separation of Stubbington and Lee-on-the-Solent from Fareham and Bridgemark along with maintaining the separate identity of Peel Common.'* This therefore appears to contradict the removal of the Newgate Lane area from the Strategic Gap.

A7 The proposed removal of this land from the Strategic Gap also appears to be at odds with FBC's own supporting evidence. The Fareham Landscape Assessment (2017) incorporates a review of the Strategic Gap designation including the 'Woodcot area' which includes the land covered by the proposed Newgate Lane allocation. It concludes,

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

- A8 Gosport Borough Council agrees with these findings set out in the Fareham Landscape Assessment and considers that the Woodcot area should remain an integral part of the Strategic Gap.
- A9 Whilst it is recognised that the local plan process is the appropriate time to review such designations it is considered that the proposed change at Newgate Lane will affect the integrity of the remaining gap by significantly reducing its width. The residential proposal by its sheer scale will undoubtedly harm the integrity of the gap and will diminish the physical and visual separation of the settlements.
- Transport and accessibility*
- A10 The Council also objects to the proposed allocation due to the potential negative impacts on the new Newgate Lane route. The new route was designed to achieve the following:
- improving access to the Peninsula including the Solent Enterprise Zone at Daedalus;
 - increasing capacity and easing existing congestion on the route;
 - creating fewer interruptions to traffic flow caused by turning traffic, or on-road cyclists;
 - improving the alignment for safety reasons.
- A11 These objectives would be undermined by the proposed development. It was not intended that the improvements would facilitate new housing development.
- A12 The DFLP is accompanied by an Interim Transport Assessment for the DFLP allocations (Oct 2017) which recognises that the current Volume over Capacity (v/c) exceed 100% in the PM peak on Newgate Lane and is approaching available practical capacity in the AM peak resulting in significant congestion. Consequently it is already recognised that traffic exceeds the available capacity on this strategic route. Table 3 summarises information from this document which highlights that this situation is predicted to worsen over the period to 2036 and consequently the report recognises that Newgate Lane will experience '*more noticeable increases in traffic flow.*'

Table 3: Road capacity on Newgate Lane

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

*1 including Stubbington Bypass and Newgate Lane improvements

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

- A13 At the present time this allocation has not been assessed by the Local Highway Authority to determine the implications on the highway capacity of Newgate Lane and no modelling work has been assessed to consider the trip generation from this level of development, either in terms of numbers of additional vehicles or their likely distribution on the highway network or highway safety. Therefore the Council has no option but to object to the proposed allocation in the DFLP on this issue at this stage. Gosport Borough Council is very concerned that the proposed allocation will have a detrimental impact on the existing significant congestion problems on the Gosport Peninsula and detract from recent and proposed improvements that aim to improve traffic flow to, and from, the Peninsula. This is critical for the future economic prosperity of the Borough including achieving the full potential of the Enterprise Zone.
- A14 The north-south movements along Newgate Lane should not be hindered by any proposed new access arrangements for the proposed allocation and the Council objects to any proposals which will significantly hinder this flow. A new access off the proposed roundabout will introduce an interruption to traffic flow, particularly as it is envisaged to serve the whole development and that by its location and limited transport choice the proposed allocation would be very car-dependent. Indeed the supporting FBC Sustainability Appraisal concedes that the *'majority of sites [in the DFLP] are sustainably located which will improve accessibility and encourage travel by sustainable modes, although the urban fringe sites at Funtley Road and Newgate Lane South are less sustainably located.'*
- A15 Due to the lack of detailed available information it is not known what the likely impacts will be on the links and junctions further north e.g. the northern section of Newgate Lane, the Longfield Avenue roundabout, the northern section of the A32 and the Quay Street roundabouts and beyond to the M27 Junction 11. Additionally, vehicles travelling south from the site will also reduce the capacity of the recently improved Peel Common Roundabout, which may also have significant implications for traffic queuing on Rowner Road.
- A16 Given that the proposed allocation may well negate the benefits gained by the Newgate Lane road improvements it will also be necessary to consider whether this site together with other potential residential developments on the south side of Fareham could cumulatively have a detrimental impact on the function and objectives of the Stubbington Bypass. It is important to note that the DFLP states in paragraph 11.46 that the Stubbington Bypass is not being provided with an intention of serving or facilitating additional new homes. FBC is therefore not being consistent in its policy approach between the Stubbington Bypass and the Newgate Lane improvements.
- A17 The Newgate Lane allocation policy (HA2) includes a criterion that makes provision for off-site highway improvements and mitigation works, however, this Council requires further details of such measures, and questions whether the principle of any proposal at this site would be able to satisfactorily mitigate these impacts.

- A18 The Council is also concerned that the proposed allocation would not meet the requirements of the DFLP sustainable transport policy (Policy INF2). Amongst other things, this policy aims to ensure that development:
- does not demonstrate a severe cumulative impact (causing demonstrable harm) on the operation, safety or accessibility to the local or strategic highway networks; and
 - mitigates impacts on the local or strategic highway networks arising from the development itself, or the cumulative effects of development on the network, through provision of improvements or enhancements to the existing network to accommodate additional traffic; or contributions towards necessary or relevant transport improvements.
- A19 In the light of the above policy it is considered that the proposed allocation may not be able to provide any meaningful improvements to satisfy these requirements given the current and ongoing access issues to and from the Gosport Peninsula.
- A20 The DFLP originally proposed two other vehicular accesses (in addition to Newgate Lane) which link the potential new allocation to the existing residential communities in Gosport. This includes Brookers Lane as a secondary access for a limited number of dwellings.
- A21 The other proposed access off Tukes Avenue has now been withdrawn following a recently issued addendum by FBC which reads, *'The site promoter has advised Fareham Borough Council that the potential access identified via the demolition of two houses on Tukes Avenue (165 and 167) is a factual error. The site promoter has confirmed that potential vehicle access via these properties is not being pursued'*
- A22 Notwithstanding that the residents of these and adjacent properties were most unfortunately not previously notified of these proposals, it is not clear from this statement whether the site promoter will be seeking an alternative access on the eastern boundary. It is considered that any such access points from housing areas within Gosport, will add to traffic on the local highway network within Gosport, which again has not yet been quantified in terms of number/distribution and junction/link capacity. The nature and scale of these access points will have a direct impact on their use/attractiveness, particularly if through routes are created. The creation of such accesses may create rat-runs through the existing residential areas within Gosport, due to perceived journey time savings compared with joining Rowner Road/Peel Common Roundabout. This could be exacerbated with the development of the Stubbington Bypass.
- A23 Despite the addendum significant concerns remain regarding any proposed access onto Tukes Avenue. These include:
- The amenities of neighbouring residents as an access road will serve a considerable number of dwellings;
 - The capacity of Tukes Avenue and adjoining roads to take the additional traffic; and
 - The proximity to facilities such as Woodcot Primary School and the impact on pedestrian safety.

- A24 There is no mention of improving public transport with regard to the proposed allocation. This needs further consideration to reduce the site's car dependency which would add further pressure on Newgate Lane. This will also have a detrimental impact on the existing Air Quality Management Areas within Fareham. It will be necessary to explore strategic transport options such as the potential for a new bus rapid transit link which could connect Lee-on-the-Solent, Daedalus, Newgate Lane, and the Busway through to Fareham.
- A25 Cycle and pedestrian links to the adjacent Bridgemary and Peel Common are identified in Policy HA2.
- Residential amenities and design*
- A26 Any development of this scale on greenfield land will create significant concerns from existing residents particularly in areas immediately adjoining the site. It will be critical that their amenities are not harmed by any future proposals on this site and this should be reflected in Policy HA2.
- School provision*
- A27 Provision is included in the policy to ensure improvements to local schools and early-years childcare (as identified by the Local Education Authority). However, there is insufficient detail of how local school places could be affected by the proposals. It will be necessary to understand the impact of the new housing development on local schools as any development on this site is likely to include a high proportion of households with children.
- Community facilities*
- A28 It will also be important to understand whether any new development at Newgate Lane can be sufficiently supported by other community facilities in the area including health facilities (such as GPs) and community hall provision and whether it is necessary to provide new community facilities as part of the development. Consequently without such information such proposals cannot be supported.
- A29 Policy CF1 of the DFLP recognises the need for community facilities as part of large residential developments and that these should be delivered to prescribed timescales to meet the needs of the community. The DFLP specifically mentions Bridgemary School as the primary location for community facilities (sport pitches, courts, hall and stage, and various meeting and conference rooms for hire). It states that these facilities are generally less than 1km from within the allocation and that it is not considered necessary for additional space to be provided with the allocation.
- A30 Policy LP32 of the GBLP requires the consideration of community facilities for new residential developments (normally for sites of 100 dwellings or more). It is therefore considered appropriate for FBC to further assess the community requirements of a development of this scale and include such provision within Policy HA2.

Open space

A31 The proposals as set out in Policy HA2 include a number of open space requirements including:

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

A32 It will be necessary to ensure such provision meets the requirements of any new community without affecting that enjoyed by existing residents.

Air quality

A33 Any additional traffic on Newgate Lane is likely to have an impact on the Air Quality Management Area (AQMA) at the north end of Newgate Lane and Gosport Road and therefore it would be necessary to include measures mentioned in Policy INF2 specifically to mitigate this impact for this development allocation. This may be difficult for a development of this scale with limited public transport choice. The issue of air quality is highlighted in the Interim Traffic Assessment which notes that in January 2017, Fareham and Gosport Environmental Health Partnership issued the Annual Status Report 2016, which concluded that both the existing AQMAs need to be extended as locations outside of the AQMAs had exceeded the annual mean NO2 objective for Fareham. The AQMA extensions were agreed in October 2017.

Drainage

A34 The area includes a number of drainage ditches which are part of the River Alver catchment. The development allocation proposes to retain and enhance these drainage ditches as part of a Sustainable Drainage System (SuDS). It will be important to understand the impact of any development on potential for surface water flooding in the vicinity and the water quality of the River Alver.

Natural environment

A35 The proposal aims to retain existing field and tree boundaries and to incorporate street trees and verges to reflect the character of Bridgemary.

END