

APPLICATION P/19/0460/OA

I am writing to object to the planning application made on behalf of Bargate Homes for 115 dwellings on land at Newgate Lane (South).

I am the county councillor for the Bridgemary Division on Hampshire County Council and borough councillor on Gosport Borough Council for the Peel Common Ward. The Peel Common Ward forms part of the Bridgemary County Division. I am also currently Chairman of the Economic Development Board of Gosport Borough Council. I feel especially strongly that my comments, on behalf of the people I represent on both authorities, should be properly considered given that the Applicant has made numerous references to the Bridgemary area in his application statements.

First I want to address my comments to the two principal documents attached to the application making observations on the many assertions and proposals contained within. Those two documents are: the Design & Access Statement; and the Planning Statement.

DESIGN & ACCESS STATEMENT

Page 13, Paragraph 2.15

I strongly disagree with the assertion that the proposed development “strengthens the strategic gap”. This is a recurring theme and it needs to be challenged. Fareham Borough Council’s Local Plan, the Core Strategy (adopted August 2011) defines the Strategic Gap:

“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.”

I would be inclined to agree with and accept this definition. Whilst any developer could attempt to argue that they might consider it acceptable to build residential units in the Strategic Gap, it is not logical to argue that such building could “strengthen” the Strategic Gap.

Page 15, Paragraph 2.20

This section refers to “convenient access to the neighbouring ward F”. I assume that this sentence is suggesting that “ward F” is the Peel Common Ward in Gosport.

Page 22, Paragraph 2.39

This states, “Development proposals will be formulated having due regard to the policies that make up the local plan”. This is as one would expect. However, it is written in the context of a number of pages immediately preceding it that refer entirely and exclusively to Bridgemary along with a number of photographs of housing throughout both my county division and borough wards. I will return to this theme later.

Page 25

The comparison of constraints and opportunities alludes to the “lack of pedestrian points along Newgate Lane”. However, it also identifies an “opportunity to provide a pedestrian link at Woodcote Lane to enable greater permeability and access to services”. This is a theme that is repeated throughout the planning statement documents. The services referred to here are

exclusively within the neighbouring Borough of Gosport and in my borough ward and county division in particular.

Page 33, Paragraph 4.3

This paragraph refers to the consultation process on application P/18/1118/OA. The public consultation event alluded to here took place at St Matthews Church in my county council division of Bridgemary in the Borough of Gosport.

Earlier at Paragraph 4.1 it says that the Applicant has engaged with the Council. Indeed, I am sure he has. However, that would be Fareham Borough Council and not Gosport. The Applicant continually refers to Bridgemary and to Peel Common throughout his planning statements.

Page 35, Paragraph 4.5

In my objection letter of 24 October 2018 to application P/18/1118/OA I said that the Applicant had clearly set out his future intentions to bring forward a further application for an addition 125 dwellings (revised subsequently to 115 dwellings). This paragraph is proof of that and goes as far as to say that both applications form “a cohesive scheme between the two”.

Page 35, Paragraphs 4.9 – 4.11

This section is dedicated to the HA2 proposal which formed part of the Fareham Borough Council Draft Local Plan published in October 2017. This Draft Local Plan was later scrapped by Fareham Borough Council in December 2018 following publication of the NPPF in July 2018. It was reinstated by Fareham Borough Council into their emerging Draft Local Plan in June 2019 only to be removed again in October 2020 following the publication of the Government’s White Paper on Planning reform. However, the Design & Access Statement persists in asserting the existence of HA2. This is another recurring theme of the Applicant’s planning statements.

Page 41, Paragraph 5.13

Here is another reference to “nearby facilities in Bridgemary”, of which there are many such references.

PLANNING STATEMENT

This is the more substantive document of the two and I shall make my comments in a similarly chronological manner.

Pages 4 & 5, Paragraphs 2.13-2.26

Under the headings of:

- Convenience Shopping and Retail
- Health and Education
- Leisure and Open Space
- Employment
- Public Transport

there are references under each sub-heading to facilities within Gosport and mainly within the Bridgemary County Division that I represent.

There is an explicit and repeated intention for this **Fareham** development to benefit **Fareham** Borough Council in terms of housing numbers and Section 106 agreement by exploiting facilities within the neighbouring Borough of Gosport.

Without going into detail on all these references, I will highlight the one entitled *Employment* in which the Planning Statement states, “*There are a significant number of employment opportunities within Fareham and Gosport town centres.*” Whilst it would be fair to say that Gosport is not an area of high unemployment (although the Planning Statement does not say this), it is not accurate to say there are significant employment opportunities in Gosport.

The *Gosport Infrastructure Investment Plan*, published Spring 2019 by the Solent LEP in conjunction with Lichfields, sets out in detail the employment challenges faced by Gosport. 20,600 people out-commute every day from Gosport; it has a job density ratio of 0.51 – amongst the five lowest in Britain; it is the largest town by population anywhere in the UK without a railway station; there is just one ‘A’ road which is in the top 10 most dangerous and the top 23 most polluted in the country; it’s peninsular location means that the vast majority of workers have to commute by car through Fareham; in order to reach the average job density for the south-east Gosport would have to create an additional 14,500 jobs – an increase of 50%.

The suggestion that there are significant job opportunities in Gosport is not supported by the facts.

Paragraph 2.24 refers to Fareham Borough Council’s ambition to generate employment at the Enterprise Zone at Daedalus. I fully support Fareham Borough Council in this endeavour. However, the success of the Enterprise Zone depends upon there being good and reliable road links. A significant part of that strategy for improved road links is the recently completed Newgate Lane East. Far from residents being able to benefit from employment opportunities at the Enterprise Zone, the proposed developments by the Pegasus Group would contribute to further congestion of the new Newgate Lane East and greatly contribute to the destruction of jobs.

Paragraph 2.26 says,

“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.”

This statement implies that CEMAST and the IFA2 interconnector are somehow linked, which they are not. It also implies that IFA2 is a source of employment for trainees at CEMAST, which it is not. Despite its enormous and imposing structure, IFA2 employs fewer than ten people.

Page 7, Paragraphs 3.6 & 3.7

Like page 35 of the Design & Access Statement this paragraph refers to the “HA2 Allocation”. As previously mentioned, the HA2 allocation has been withdrawn by Fareham Borough Council.

The Newgate Lane (South) Transport Assessment was published by Hampshire County Council in June 2015. The purpose of the new Newgate Lane East relief road was clearly stated:

“The Newgate Lane southern section scheme aims to improve journey times, journey reliability and safety along the corridor for the benefit of drivers, cyclists and pedestrians. This will assist movement in a north-south direction between Fareham and Junction 11 of the M27, and the Gosport Peninsula. Accordingly, the objectives of the scheme are:

- To reduce peak period congestion and improve traffic speeds along the B3385 Newgate Lane corridor by providing a wider carriageway and a separate route for cyclists;
- To help encourage regeneration, investment and growth in the Gosport Peninsula;
- To help remove the transport barriers to growth;
- To help unblock critical bottlenecks and congestion hotspots on strategic routes, in town centre areas and in areas of employment; and

■ To provide new and improved existing infrastructure to help better manage traffic flows, particularly during peak periods.”

There was no suggestion at any time that the new Newgate Lane East should accommodate housing development. Newgate Lane East was conceived and designed to address an existing infrastructure deficit.

Pages 10 & 11, Paragraphs 4.9-4.16

Paragraph 4.16 is worthy of mention. It says that “*consultation responses received in respect of the live planning application P/18/1118/OA apply equally to this proposal and have also been relied upon to inform this planning application.*” This is a strange statement given that Fareham Borough Council reported on 24 June 2020 that they had received a combined total of 517 objections, plus petitions, but only one letter in support.

Part 5, pages 12-22

This section of the Planning Statement sets out what the Applicant sees as the relevant planning policies.

Paragraph 5.41 says that “the Draft Local Plan can be afforded weight in accordance with its stage of preparation”.

Subsequent paragraphs (up to 5.52) address Fareham Borough Council’s emerging planning policy. Some aspects of these paragraphs have been superseded by the decision of Fareham Borough Council at their meeting on 22 October 2020. The Executive Leader of Fareham Borough Council confirmed at that meeting the removal of the HA2 housing allocation from the emerging Local Plan. The minutes of that meeting read as follows:

“The Executive Leader was pleased to be able to make a further, more positive, announcement and reported that a press release had just been released by the Council explaining that we are seeking a nature-based solution to protect the strategic gap between Stubbington and Fareham and between Fareham and Gosport.

The Executive Leader went on to announce that he has been working with Gosport Borough Council over recent weeks to seek their support for an initiative which involves the two Councils joining forces to look for benefits for both Boroughs from two pots of government money that are aimed at increasing wetlands, woodlands and meadows in the Solent area.

The Executive Leader stated that working on this joint initiative will see land between our two towns re-wilded. This shared vision follows this month’s announcement by the government to invest £3.9m to set up an online Nitrate Trading Auction Platform. The government is also considering a loan to the Hampshire and Isle of Wight Wildlife Trust for further land purchase in the Solent region for re-wilding. Both initiatives will provide additional habitat-rich areas for wildlife while unlocking much needed land for homes.

The Executive Leader also stated that Members may recall 3 weeks ago the Prime Minister joined 65 World Leaders in a pledge to preserve losses of wildlife habitat

and this, in the UK could mean additional 400,000 hectares of woodland, wetland and meadow by the end of the decade. The Council would like to see the entire strategic gap which lies between Fareham and Gosport and between Fareham and Stubbington re-wilded to provide nitrate mitigation and preserve wildlife and this scheme provides the opportunity to achieve this. The Executive Leader stated that as members all know, he has been in unwavering support of preserving the Borough's precious strategic gap and indeed seeking its designation as green belt."

Section 6, Paragraphs 6.12 to 6.25

The Applicant details his position in favour of development by concentrating on the Council's inability to demonstrate a five-year housing land supply but I, and no doubt Fareham Borough Council too, will argue that **Policy DSP40** of their current Local Plan is relevant in this matter.

Paragraph 7.18 contains a significant admission which is repeated elsewhere in the Planning Statement, that this application has been brought forward "in advance of the proposed HA2 allocation". As previously stated, HA2 has been withdrawn.

The following paragraphs expand upon this. For instance, paragraph 7.23 says "the relief road ensures that there is capacity for all three developments", but, as previously stated, the Applicant may say this, but it is not true that the road was designed to accommodate development along the Newgate Lane corridor.

Paragraph 7.24 asserts that the "design and layout of the scheme has been specifically designed to work with ...the proposed HA2 allocation".

So, these paragraphs eliminate any confusion and establish unequivocally, that the whole intention is develop a 665 dwelling housing estate bolted onto Bridgemary. The Applicant says in paragraph 10.3 that the entire scheme is "a logical extension of the settlement of Bridgemary". This totally ignores the obvious fact that Bridgemary is in Gosport and that P/18/1118/OA, P/19/0460/OA and HA2 are all in the Borough of Fareham.

Part 8

The theme of the planning documents for both applications is to link them to a further housing development called HA2 and that the entire development, along with existing residencies on and adjacent to the existing Newgate Lane, will become "a logical extension to the settlement of Bridgemary".

All of the planning gain offered in Part 8 of the Planning Statement is for Fareham but, by the Applicant's own admission, all the facilities to serve this substantial new housing estate will have to be provided by Gosport.

I want this application refused but, if it were to go ahead, I intend to seek some form of redress for the naked and blatant attempt to exploit community facilities provided by Gosport Borough Council for Gosport residents. I utterly reject any suggestion that this and its associated proposed developments would be good or beneficial for my residents and for my community.

Part 9 pages 48-50

As previously stated, I believe the impacts on my ward and county division "significantly and demonstrably outweigh the benefits". Indeed, there are no benefits at all for the community I represent. I would, therefore, contend that this application is not in line with the NPPF "tilted balance".

In particular, Paragraph 9.9, when read in conjunction with Paragraphs 7.18, 7.23, 7.24, and 10.3 is especially cynical. It claims the developments will:

- *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*
- *Protection of value of green infrastructure"*

This statement is made as part of claim that Fareham Borough Council's Policy CS22 is met. It is a completely unsupportable claim. CS22 is clearly not met.

PLANNING GROUNDS FOR OBJECTION

I would not wish to dwell on this aspect because I am confident that the Planning professionals from Fareham borough Council will address these points far better than I.

Policy CS6 specifically for Stubbington, Hill Head and Titchfield says, *"The Council does not expect these settlements to play a significant role in providing further housing provision. The SHLAA identifies these settlements as capable of providing limited development (around 90 dwellings in total, around 60 of which are within Stubbington and Hill Head"*. This is a sensible policy. I support it and for this reason I contend that this application is **contrary to Policy CS6**.

Policy CS11 refers to development in Portchester, Stubbington and Hill Head and says there should be *"small scale development with clearly laid down caveats"*. Given that the Applicant has decided to link P/18/1118/OA with this application and with, what he sees as, a further development at HA2, I would contend that this is not a small scale development and is, therefore, **contrary to Policy CS11**.

Policy CS14 is designed to strictly control and protect the countryside. As with Policy CS6, the Applicant would seem to acknowledge that this application is **contrary to Policy CS14** for the reasons they seek to dismiss it as irrelevant.

Policy CS22 is central to this application and that explains the reason why the Applicant has gone to such convoluted lengths to dismiss it as irrelevant. CS22 is not irrelevant. I would re-emphasise the quote from earlier:

"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."

In addition these settlement gaps are also considered vital by the Partnership for South Hampshire (PFSH) (formerly the Partnership for Urban South Hampshire). Fareham Borough Council's Core Strategy says,

"The PUSH authorities have agreed a joint policy framework which underpins the designation of settlement gaps in South Hampshire. The PUSH settlement gap designations within Fareham are known as Strategic Gaps."

I would, therefore, contend that CS22 is highly relevant to this application and that the application is **contrary to Policy CS22**.

In June 2015 Fareham Borough Council produced their Local Plan document Development Sites & Policies. **Policy DSP6** states:

“There will be a presumption against new residential development outside of the defined urban settlement boundaries”

There are three exceptional circumstances in which development under DSP6 would be permitted and none of these apply. I believe, therefore, that the Applicant’s assertion that DSP6 is out of date is incorrect and that this application is **contrary to Policy DSP6**.

The Applicant goes to some length to justify that **Policy DSP40** is satisfied. However, I am not convinced. Although Fareham does not currently have a demonstrable five-year housing land supply, certain criteria have to be met for the Council to allow development outside the urban settlement boundaries.

At *ii*) It is argued that the site is “well integrated” with Bridgemary and Peel Common. The Applicant justifies his argument by including HA2 which, as previously stated, was part of the Draft Local Plan, but has since been deleted. As the councillor and county councillor for the neighbouring area of Peel Common and Bridgemary I would categorically assert my belief that the planning application site is NOT well integrated.

At *iii*) the assertion by the Applicant is that the Strategic Gap can be redefined as commencing to the west of the application site. This is another example of an attempt to bolt-on their development to my borough ward and county division. I utterly reject this.

At *v*) the Applicant is on thin ice. Air quality and traffic congestion are high on the agenda at present. Residents of this development would be heavily reliant on the motor car. All vehicles would have to feed into what is currently an area with air quality below the legally acceptable minimum. Fareham Council was one of 23 authorities named within the government’s NO2 plan as having to assess options for improving air quality, in order to comply with legal limits on nitrogen dioxide air pollution with readings of more than 40 µgm⁻³. It is, in my view, very difficult for the Applicant to argue that this condition is met.

As all five of the criteria have to be met and I contend that only two can be, this application is, therefore, **contrary to Policy DSP40**.