



Registered Charity No.271344

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Alison Bell (Case Officer)
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Dear Ms Bell

Fareham Society observations on appeals APP/A1720/W/20/3252180 and 3252185 by Fareham Land LP and Bargate Homes Limited on land at Newgate Lane, Fareham

The Fareham Society is strongly opposed to both appeals. For reasons set out below the proposed developments are contrary both to the development plan and the emerging development plan. As the sites are adjacent to each other similar, if not identical, considerations arise and this response covers both proposals.

Both sites are outside the defined urban settlement boundary and thus in the countryside in Policy terms. Policies CS2 and CS6 of the adopted Core Strategy give priority to the re-use of previously developed land and support development within settlement boundaries. Outside settlement boundaries development is strictly controlled by Policy CS14 which does not allow for development of the scale and type proposed. This approach is reinforced by Policy DSP6 of the Local Plan Part 2 which contains a presumption against new housing outside the defined urban settlement boundary. Policies in the Draft Fareham Local Plan 2036 follow the same broad approach.

The Society accepts that, given the absence of a five-year supply of land for housing, Policy DSP40 of the Local Plan Part 2 allows for housing outside the urban area subject to all of the listed criteria being met. In this case the proposed developments fail when assessed against **Criteria ii, iii and v** for reasons set out below.

Assessment against Policy DSP40

Criteria ii

Both sites are visually poorly located in relation to existing settlement boundaries. The development of these sites, whether looked at individually or together, would result in housing so

well removed from settlement boundaries as to appear isolated and incongruous in this rural setting.

Nor would the proposed development be well located in terms of accessibility to Bridgemarky, the closest of the major built-up areas. Access by car between the two areas would be lengthy and circuitous. Access by foot would be via Woodcote Lane to the south of the southernmost site and thence over Newgate Lane East and into Brookers Lane in Bridgemarky. This sole access would not give the degree of permeability necessary to provide a sustainable and well integrated development. Brookers Lane with substantial trees/hedgerows to either side has not got the levels of natural surveillance to make it a pleasant path to walk along for the young and elderly. Moreover, Newgate Lane East is a speedy and busy road. As things stand it is not an easy or safe road to cross. Whilst improvements to the existing crossing point could potentially be achieved it is considered that it would always be perceived as dangerous for use particularly by the young and elderly.

As outlined in the Council's Committee report the application sites are not accessibly located in relation to primary and secondary schools (*CDC.1 para. 8.42 and CDC.2 para. 8.41*). Pupils accessing these schools would be likely to do so by car contrary to the need to move to a low carbon economy and the prudent use of natural resources.

The proposed developments would fail to meet **Criteria ii** given their poor location to the existing settlement boundaries, poor integration with the neighbouring settlement and unsustainable location.

Criteria iii

In relation to this criteria a key concern of the Society is the adverse impact of the proposed development on the Fareham/Bridgemarky and Stubbington/Lee on Solent Strategic Gap in which the sites lie. For brevity I shall just refer to it as the F/B Strategic Gap. This is one of two Strategic Gaps in the Council area. The Strategic Gaps have long played an important role in maintaining open undeveloped land between built up areas so as to prevent neighbouring urban forms from merging into one another.

The F/B Strategic Gap encompasses a broad swathe of open land between Fareham, Stubbington, and Gosport and its northern extension of Bridgemarky. The appeal sites lie on the eastern side of the Gap on land between Peel Common, a small ribbon of housing, and the extensive residential area of Bridgemarky.

The Fareham Borough Gap Review 2012 identified the Peel Common area as one of the more strategically important areas of gap (*CDG.1 para. 9.6*). Contrary to the appellants' contention this remains the case notwithstanding the recent construction of Newgate Lane East on land to the east of Peel Common. A report prepared for the Inspector on the Fareham Local Plan Part 2 said that although the Fareham Gap Review did not specifically take it into account the new road does not alter the need for the Peel Common area to remain in the Strategic Gap. It concludes that "The Strategic gap between Fareham and Stubbington is vital to maintain the separate identities of the two settlements and the new road improvements should not compromise this". This view was endorsed by the Inspector following his visit to the area (*CDE.4 para. 15*). A visit

to the site now would further endorse that view. Even with the road in situ the impression of an extensive open undeveloped area in the vicinity of Peel Common remains.

The Fareham Landscape Assessment 2017 (*CDG.15 LCA8 areas 8.1a and 8.2a*) similarly saw the Peel Common area as playing a critical role of preventing the coalescence of urban areas and also acknowledged that the narrowness of the gap between development at Peel Common and the edge of Bridgemary means that this area has a particularly vital role in maintaining physical, visual and perceived separation. It considered that it was necessary to maintain the distinctly isolated nature of the settlement at Peel Common and that there should be no large scale development that would extend its boundary and give rise to the physical or perceived coalescence with other settlements. Peel Common and the appeal sites remain in the Strategic Gap in the Draft Local Plan.

There has thus been longstanding support for the retention of the Strategic Gap in the vicinity of the appeal sites. And the construction of Newgate Lane East has not limited the important role of this area in preventing the coalescence of settlements.

The scale of the proposed developments (taken singularly or together) and their proximity to Peel Common mean that they would clearly detract from the isolated nature of Peel Common, harm the rural character and appearance of the area and extend development to a degree that would be detrimental to the role of the Strategic Gap in preventing the coalescence of settlements.

In taking this view regard has been had to the appellants' reference to the housing allocation (site HA2) to the east of Newgate Lane East in the Draft Local Plan. However, this Plan is at a very early stage towards adoption and this highly controversial proposal may never go ahead. The allocation should, therefore, be given very little weight. Even if it were to go ahead it would offer no support for the appellants' case as, if anything, it would make it all the more important to retain the remaining open land undeveloped.

The appellants have referred to the Strategic Growth Area proposed between Fareham and Stubbington in a recent supplement to the Draft Local Plan. Not only is this at a very early stage towards adoption, and thus carries very limited weight, but it has been drawn to specifically exclude Peel Common and the gap between Fareham and Bridgemary.

The proposed developments would fail to meet **Criteria iii** given the seriously adverse impact on the F/B Strategic Gap and the detriment to the character and appearance of this rural area.

Criteria v

As things stood at the time the applications were taken to Committee legal agreements were not in place to secure the protection of European Protected sites. This would be likely to render the proposed developments unacceptable on environmental grounds. Although this is a matter potentially resolvable by the appellants entering appropriate legal agreements regard must be had to the fact that to date this has not been done.

The proposed developments would result in the loss of Grade 3a best and most versatile agricultural land contrary to Core Strategy Policy CS16.

The Society is concerned that substantial highway safety concerns raised by the County Council in relation to the accesses of the two sites onto Newgate Lane and the junction of this road and Newgate Lane East have not been satisfactorily addressed (*CDC.1 para.7.3 and CDC.2 para. 7.3*). It cannot, therefore, be judged at this time that safe and satisfactory access arrangements could be provided. It is hoped that the appellants do not seek to use the process of these appeals to submit alternative proposals on this. This would be an entirely inappropriate use of Inquiry time.

Newgate Lane East has been provided at great cost to ease the movement of traffic between Fareham and Gosport. As such it has important economic and social benefits for the occupants of both Boroughs. The Society supports Gosport Borough Council's concerns on the potential for these developments to create additional traffic that would negate the benefits provided by the new road. (*CDC.1 paras. 7.14-7.18 and CDC.2 para. 7.16*). This is an especially important consideration given the need to ensure good accessibility to the nearby Solent Enterprise Zone at Daedalus.

The proposed developments would fail to meet **Criteria v** due to unacceptable environmental and traffic implications.

Concluding remarks

The proposed developments are contrary to the development plan and emerging development plan. Whilst the advantages of the additional housing are understood this would not be so great as to outweigh the substantial harm identified.

For all the forgoing reasons the Inspector is urged to dismiss these appeals.

Yours sincerely,

(Mrs) B.M. Clapperton MBE
Hon. Secretary
The Fareham Society

