

**FAREHAM BOROUGH COUNCIL: LAND EAST OF NEWGATE LANE EAST, FAREHAM  
APPLICATION REF: P/22/0165/OA**

**LANDSCAPE CONSULTATION RESPONSE**

**Description of the Site and Immediate Setting**

The land in question comprises approximately 20 hectares of arable and pastoral land located to the east of Newgate Lane East and west of the settlement edge of the Woodcot suburb of Gosport (the 'Site'). The entire Site is located within the Fareham-Stubbington Strategic Gap.

The Site exhibits a relatively level topography, sitting around 10m AOD. It forms part of the upper reaches of the Alver Valley, which is a broad, shallow valley that flows southwards to the Solent.

The southern part of the Site consists of arable land, divided into three land parcels by two clipped hedgerows with ditches aligned in an approximate north-south direction. The eastern hedgerow contains two mature trees, whilst none are present within the western hedgerow.

A treed hedgerow divides the southern and northern parts of the Site. The northern part comprises open pastoral grassland with some encroachment of ruderal vegetation.

With the exception of the hedgerows, there are no internal features within the Site.

**Figure 1: View across the Site from Newgate Lane East to the edge of Woodcot, illustrating its open character**



Directly to the east of the Site is the urban edge of Woodcot, which is marked by a characteristic line of mature oak trees with fencing and an intermittent hedgerow underneath that currently provides a strongly defined settlement boundary. A service road follows the western edge of the existing settlement, providing access to garages at the rear of properties. The dwellings on the settlement edge are arranged in a linear pattern, forming a continuous line of terraced and semi-detached dwellings of a mid-20<sup>th</sup> Century character with a combination of bare brick and rendered walls and hipped tile roofs, and with their rear aspects facing towards the Site.

To the south of the Site lies an area of currently open arable land, in which the Applicant has secured outline planning permission on appeal for up to 99 affordable dwellings and associated uses. The boundary with this land is relatively open and demarked by an agricultural ditch, with three trees and

a short length of hedgerow at its western end. Beyond this land lies the treed corridor of Brookers Lane, a pedestrian and cycle connection across the valley, and further south is Brookers Field Recreation Ground.

To the south and east of the Site, beyond the Newgate Lane East highway corridor, is an area of open arable land of similar character to the Site, which would have formed a continuous agricultural unit prior to the construction of Newgate Lane East. This land was subject to a dismissed appeal for residential development in 2021, on a number of grounds including landscape.

The southern part of the Site is bounded to the west by the corridor of the B3385 Newgate Lane East, a recently constructed single carriageway public highway. A newly planted hedgerow divides the Site from the highway, and a wide verge with drainage ditch is located between the hedgerow and carriageway.

Beyond Newgate Lane East, a narrow strip of land is encased between the new and old alignments of Newgate Lane, and a strip of ribbon development comprising residential dwellings and a nursing home is located on the western edge of Newgate Lane. Beyond this lies a substantial solar farm and a sewage treatment works contained by elevated and wooded bunds.

Further north and west of the Site, a series of formal sports pitches associated with HMS Collingwood separate the Site from Newgate Lane East, and beyond this to the north-west lies the built-up area of HMS Collingwood to the west of Newgate Lane and a commercial park to the east.

The northernmost boundary of the Site is formed by a public footpath (084/128/1) that connects Newgate Lane with Woodcot. Meadow Walk Recreation Ground is located to the north of this route, comprising a wedge of public open space with an equipped play area in its south-western corner.

The principal influences upon the character of the Site therefore comprise its open arable and pastoral land use as part of the remaining countryside of the Alver Valley, its relationship with built-up areas to the east and (imminently) south, and its relationship with more open parts of the valley to the west.

## **Published Character of Wider Setting**

### ***National Level Assessment***

Natural England's National Character Assessment places the Site within the South Coast Plain National Character Area (NCA). This is broadly described as a flat, coastal landscape with an intricately indented shoreline lying between the dip slope of the South Downs and South Hampshire Lowlands and the waters of the English Channel, Solent and part of Southampton Water.

The key characteristics of this NCA are as follows, with those characteristics considered to be relevant to the Site and its setting highlighted in bold text:

- **The plain slopes gently southwards towards the coast. From the coastal plain edge there are long views towards the sea and the Isle of Wight beyond;**
- **The underlying geology of flinty marine and valley gravels extends several miles inland to the dip slope of the South Downs and the South Hampshire Lowlands. This gives rise to deep and well-drained high quality soils;**
- **In places, streams and rivers flow south from the higher land of the Downs to the sea;**
- Coastal inlets and ‘harbours’ contain a diverse landscape of narrow tidal creeks, mudflats, shingle beaches, dunes, grazing marshes and paddocks. These include the internationally important Chichester, Langstone, Portsmouth and Pagham harbours, the Hamble Estuary and the recent coastal realignment site at Medmerry between Chichester Harbour and Selsey;
- **There are stretches of farmed land between developed areas, often with large arable fields defined by low hedges or ditches;**
- There are isolated remnants of coastal heath in the west;
- Sand dune grasses and intertidal marsh communities are characteristic of the coastline, while small areas of species-rich meadow remain inland;
- The coastline provides feeding grounds for internationally protected populations of overwintering waders and wildfowl and is also extensively used for recreation;
- Along the exposed, open coastal plain and shoreline, tree cover is limited to isolated wind-sculpted woodlands and shelterbelts;
- **The area has significant urban development, with settlements along the coastline dominated by the Portsmouth conurbation, suburban villages and seaside towns including Bognor Regis, Littlehampton and Worthing linked by major road and rail systems; and**
- Historic fortifications along the coast include the Roman fort at Portchester and 19th-century defences and later naval installations built to protect the Portsmouth naval dockyard.

The Site and its setting are therefore considered to be moderately representative of the South Coast Plain National Character Area, in particular in relation to the Site’s presence as an area of farmed land separating developed areas that slopes gently to the south.

### ***County Level Assessment***

At county level, the Hampshire Integrated Character Assessment, undertaken in 2012, places the Site within the 9F: Gosport and Fareham Coastal Plain Landscape Character Area, the key characteristics of which are as follows, with those representative of the Site and its setting highlighted in bold text:

- **A low lying landscape which physically forms part of the coastal plain but is isolated from the coastline by development;**

- **Drained by shallow valleys of the River Alver and Wallington in the east and by small streams running into the Meon to the west;**
- **Predominantly light soils which are of high agricultural quality with heathier soils in the extreme south and shingle on the foreshore;**
- **In the south, grassland pasture dominates while to the north there are large arable fields with no significant boundary vegetation;**
- **The area is strongly influenced by the adjoining urban areas of Gosport, Stubbington and Fareham, and by defence infrastructure;**
- The Solent coast draws visitors, particularly local residents for various leisure activities including angling, sailing and walking;
- **Numerous small parks and allotments;**
- Varied coastal views including across Portsmouth harbour and the city skyline which contrast with views across busy stretch of the Solent; and
- A landscape rich in historic naval defences particularly forts which ring Portsmouth harbour and protect her entrance.

The Site and its setting are therefore considered to be strongly representative of the Gosport and Fareham Coastal Plain Landscape Character Area, representing all key characteristics with the exception of those that only occur near to the coast.

The assessment also places the Site within land associated with the Coastal Plain Open Landscape Type. The key identifying characteristics and boundary definitions of this landscape are listed as follows, with those considered to be representative of the Site and its setting highlighted in bold text:

- **Extensive and flat or gently sloping plain;**
- **Nationally important high grade agricultural soils, often supporting intensive horticulture and historically market gardening crops;**
- **Tree shelter belts and low hedgerows with windswept trees near the coast;**
- **Often associated with early more piecemeal enclosure – but the fields have often been enlarged and reorganised creating an open character;**
- Includes area where there has been historically greater levels of market gardening;
- **Often associated with arable land uses;**
- **Less semi natural habitats than coastal plain enclosed;**
- **Lack of bridleways, open access sites restricted to remnant seaside commons;**
- History of gravel quarrying – restored sites can sometimes be obvious by the fact that they are at a lower level than the surrounding landscape;
- **Some of the most densely developed areas in Hampshire have occurred in this landscape;**

- Some areas are particularly exposed to coastal weather where trees have been moulded by the prevailing winds; and
- Big skies and flat horizon to the south, sometimes with distant grey outline of the hills of the Isle of Wight, engender sense of exposure and anticipation of the coast to the south.

The Site and its setting are therefore considered to be strongly representative of the Coastal Plain Open Landscape Type, reflecting the majority of its key characteristics.

### **Borough Level Assessment**

At a local level, the Fareham Landscape Assessment, published in 2017, places the Site within the Woodcot/Alver Valley Landscape Character Area (LCA8), close to the boundary of the Fareham/Stubbington Gap Landscape Character Area (LCA7), which lies beyond Newgate Lane to the west.

The Woodcot/Alver Valley Landscape Character Area is described as follows:

*“The Alver Valley also forms part of the strategic gap separating Fareham and Gosport but it is very different in character and scale from the open farmed landscape to the west. It comprises a mixed pattern of wooded common, small-scale pasture and ribbon development along the corridors of the River Alver and Newgate Lane and is bounded to the east by the urban edge of Gosport and to the north by the outskirts of Fareham.”*

The essential characteristics of this area are listed as follows, with those representative of the Site and its setting highlighted in bold text:

- **A mosaic of small and medium fields at Woodcot, forming a mixture of small horse-grazed pasture and larger arable fields divided by fences, ditches and gappy hedgerows;**
- **Although this area forms the upper part of the Alver Valley it lacks a distinct valley character;**
- The hedgerow pattern is gradually replaced by scrubby woodland to the south, enclosing Chark Common and the golf course; and
- **The character is influenced by the busy road corridor and the urban characteristics of Peel Common and Solent Enterprise Zone at HMS Daedalus on one side and the urban edge of Bridgemary on the other.**

The Site and its setting are therefore considered to be strongly representative of the Woodcot/Alver Valley Landscape Character Area, representing all key characteristics with the exception of the one that only occurs to the south of the area.

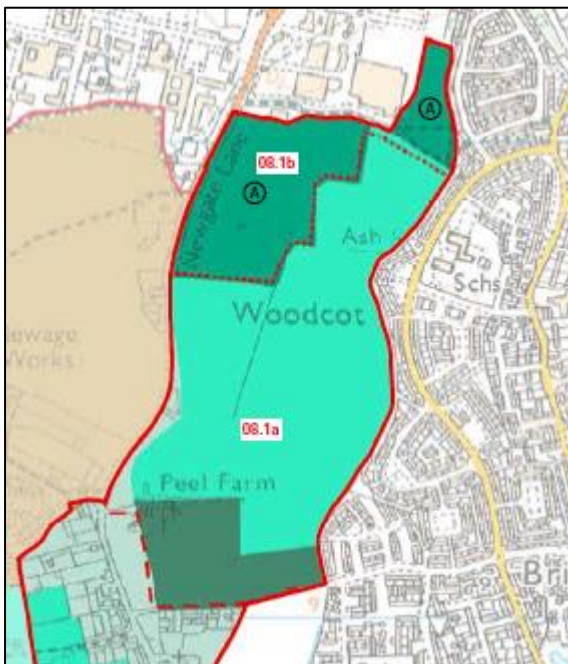
In terms of Landscape Types, the assessment associated the Site with the Open Coastal Plain: Weak Structure Landscape Type. The Open Coastal Plain is the most expansive landscape within the borough, and the Weak Structure sub-classification encompasses those areas that represent open

farmland with a less pronounced hedgerow and tree structure. Again, the Site and its setting are strongly representative of this published character.

### Published Sensitivity of Wider Setting

The second section of the Fareham Landscape Assessment presents a sensitivity assessment of each of the Landscape Character Areas, dividing them into Local Landscape Character Areas (LLCAs). The assessment placed the Site within LLCA 8.1 (Woodcot). This LLCA is further sub-divided into Sub-Area 8.1a, reflecting the arable land in the south of LLCA 8.1, and Sub-Area 8.1b, reflecting the recreational land directly to the north of the Site. The assessment therefore places the Site entirely within Sub-Area 8.1a, as shown on Figure 2 below.

Figure 2: Extract from Fareham Landscape Assessment showing distribution of Local Landscape Character Areas.



For each LLCA, the sensitivity assessment examined the baseline context and then presented an assessment of the following factors:

- Landscape character and value;
- Views, visual features and viewers;
- Contribution to setting and settlement character; and
- Contribution to green infrastructure network.

In terms of landscape and visual sensitivity, the assessment judges LLCA 8.1a to be of high landscape sensitivity and moderate to high visual sensitivity, implying that this area has little or no capacity for development.

In terms of the contribution to setting and settlement character, the assessment identifies the fundamental role of this area of countryside, along with the land to the west, in separating the settlements of Fareham, Stubbington and Gosport. It therefore concludes that there is very little scope to accommodate development without a significant impact on the integrity of the area's countryside and the important role it plays in preventing the coalescence of settlements.

The assessment also found LLCA8.1a to be of moderate green infrastructure sensitivity, on account of its largely open, undeveloped nature.

In drawing these elements together, the assessment draws the following conclusion:

*“As a whole, this area is of high sensitivity primarily on account of its critical role in preventing the coalescence of the urban areas of Fareham, Bridgemary and, to a lesser extent, Stubbington, and in defining the edges, setting and separate identity of these settlements. The relatively small size of the area, the high degree of intervisibility and its generally unspoilt, rural character make it particularly vulnerable to change. The generally open nature of the landscape means that it is difficult to integrate development without it being highly visible and potentially affecting the rural undeveloped character across a wide area, as well as eroding the physical, visual and perceived gap between settlements. The situation is further complicated by the proposed new road which will have some effect on the integrity and character of the landscape resource and undeveloped gap. Even a small amount of encroachment of further built development within the area could exacerbate these effects to the point at which the character of the whole area may be fundamentally altered.”*

#### **Location within the Fareham-Stubbington Gap**

The Site is located within the Fareham-Stubbington Gap, a Strategic Gap established in local planning policy to prevent the coalescence of settlements.

Fareham Borough Council's Technical Review of Areas of Special Landscape Quality and Strategic Gaps, published in 2020, included the Fareham-Stubbington Gap. It states the Key Features of the Gap to be as follows:

- Open, predominantly arable farmland and horticulture with some glasshouses, a weak hedgerow structure and few trees;
- The settlement edges are for the most part well screened by mature tree canopy, but there is some minor visual intrusion from Fareham, Stubbington and HMS Collingwood; a few scattered farmsteads/horticultural holdings and a mosaic of small fragments of open farmland and horse-grazed pastures sandwiched between:
- large-scale non-agricultural uses of business and airfield development at Solent Airport in Daedalus to the south and the utilities of:
  - Peel Common Water Treatment Works enclosed from views by an earth bund and mature tree belt;
  - Peel Common Solar Farm;



- Construction site of Stubbington bypass, which will provide an east-west and south route through the Gap that has not previously existed;
- Urban fringe character of Peel Common residential area; and
- Recently completed highway works to Newgate Lane, and Peel Common Roundabout, with associated noise attenuation fencing and bus and cycle infrastructure.

The Review then breaks the two Strategic Gaps within the borough into a number of Study Areas. The Site is located within the 'Newgate Lane and Peel Common Area' (Strategic Gap Study Area 8c). This area is bounded by Newgate Lane to the west, the edge of Bridgemary to the east, the commercial area to the north and the B3334 to the south.

The review notes that this gap is currently still effective in providing a 'sense of separation', with vegetated urban boundaries preventing visual coalescence, but that it is at risk. The recently completed Newgate Lane East is recognised for its negative effects on tranquillity and bringing more urbanising features into this part of the Gap. The review goes on to state that any further development within the Gap is likely to cause visual, or even physical coalescence of settlements on either side of the new road corridor. It concludes that it would be inappropriate to develop in the Woodcot-Alver Valley Landscape Character Area, because it would result in coalescence between Gosport and Fareham, and it further recommends that Study Area 8c should be subject to a Green Infrastructure Strategy to enhance its value and ameliorate the existing creep of urban fringe characteristics.

### **Recent Planning History**

Prior to the current application, there is no recent planning history relating to the Site itself.

Applications were made in 2018 (P/18/00018/OA) and 2019 (P/19/0460/OA) for residential development upon two adjoining sites to the south-west of the Site, west of Newgate Lane East. These were refused by the Council and subsequently dismissed on appeal. In dismissing the appeals, Inspector Jenkins determined that the development in this location would result in significant harm to the landscape of the area, and significant harm to the character and appearance of the area. He further found that the proposals would cause significant harm to the integrity of the Fareham-Stubbington Gap and the physical and visual separation of settlements.

An application was made in 2019 (P/19/1260/OA in Fareham Borough and 19/00516/OUT in Gosport Borough) for residential development of entirely affordable housing on the land directly to the south of the Site, and north of Brookers Lane. This was refused by both Fareham and Gosport Borough Councils, but subsequently granted planning permission at appeal. In considering the impacts upon the landscape, Inspector Jones determined that the proposals would harm the character and appearance of the area, including in terms of the Strategic Gap, and that significant weight should be attached to this harm, but that this was outweighed by a housing shortfall in the overall planning balance.



## **Current and Emerging Policy Context**

The Adopted Local Plan includes Fareham Core Strategy, which was adopted in 2011, setting out the overall spatial strategy for the borough, and a number of core delivery policies to achieve this. The policies map for this strategy shows the whole Site to be in an area outside of defined settlement boundaries and located within a Strategic Gap as set out above.

The following Core Strategy policies are considered to be relevant in this instance:

- CS14: Development Outside Settlements
- CS22: Development in Strategic Gaps

The Part 2 Local Plan, entitled 'Development Sites and Policies' was adopted in 2015, setting out the Council's approach to managing and delivering development identified in the Core Strategy. The following policies from this document are considered to be relevant in this instance:

- DSP6: New Residential Development Outside of the Defined Urban Settlement Boundaries
- DSP40: Housing Allocations

The Council is currently working on a new Local Plan, and a draft copy of the Plan was submitted for independent examination on 30<sup>th</sup> September 2021. Local Plan Examination Hearings were recently held between 8<sup>th</sup> March and 5<sup>th</sup> April 2022.

The draft Policies Map associated with the submitted Local Plan shows the entire Site continuing to be located within a Strategic Gap.

The following draft policies within the emerging Local Plan therefore apply to the Site:

- Strategic Policy DS1: Development in the Countryside
- Strategic Policy DS2: Development in Strategic Gaps
- Strategic Policy DS3: Landscape

## **Description of the Proposed Development**

The submitted application comprises the construction of up to 375 dwellings and associated uses within the Site, with all matters reserved except for access.

A Concept Masterplan has been submitted with the application, which proposes a generic, perimeter block layout in a similar style to the development to the south that was allowed on appeal. Vehicular access is provided via a new roundabout on Newgate Lane East, and pedestrian/cycle access is

proposed to the north onto Public Footpath 084/128/1, onto the recently permitted development to the south, onto Newgate Lane East to the west and onto Tukes Avenue to the east.

The illustrative layout preserves the existing Site vegetation to a great extent, although a number of gaps are proposed to be created within hedgerows to facilitate access within the scheme. Additional vegetation planting is proposed in certain locations on the western boundary to reduce the prominence of the built form, although no further details are given. A field on the western edge of the scheme is proposed to be retained, as ecological habitat, and tree planting is proposed to enhance the existing hedgerows. The built elements in the eastern part of the scheme are set back from the eastern boundary by approximately 20m, with access roads and a path in the intervening space.

The illustrative layout includes a number of internal open space areas, although a significant proportion of this space is given over to sustainable drainage features. A linear park is located between one of the main access routes and a retained hedgerow, and a central green is contiguous with this, which also includes space for a Neighbourhood Equipped Area for Play. Various internal paths are indicated within the scheme, including a perimeter route.

The Applicant has submitted a Landscape and Visual Impact Assessment, prepared by Pegasus Group, alongside the planning application, which has been prepared in accordance with national guidance.

The Applicant's landscape assessment concludes that the proposals, based upon the illustrative design, would result in effects of moderate to major adverse significance upon both the Site and its immediate setting and the wider Woodcot/Alver Valley Local Landscape Character Area, reducing to moderate significance at year 15 once the proposed planting has matured. It is notable that this judgement is based upon these landscape receptors being of medium sensitivity, which is at odds with the Council's published evidence base, which has found them to be of high sensitivity with little or no capacity for development.

The Applicant's visual assessment recognises that the Site occupies a relatively narrow visual envelope on account of the settlement flanking the Alver Valley. It identifies a number of highly sensitive receptors close to the Site that would experience adverse visual effects of moderate to major significance upon completion of the development, although it makes the case that these will reduce to lesser significance by year 15 on account of the development of screening vegetation. The assessment also considers the effect of the development recently granted at appeal upon the sensitivity of receptors to the south of the Site, as some existing views would either be screened or detracting elements would be introduced.

### **Consideration of Landscape Implications**

The Site and its landscape setting are characterised by their open character as part of the gently sloping Alver Valley, their use as large predominantly arable fields with weak hedgerows, and the important role that they play in preventing the further coalescence and preserving the individual character of Fareham and the Woodcot suburb of Gosport.

The Council's published landscape sensitivity assessment has determined that the sub-area of the Woodcot/Alver Valley Local Landscape Character Area in which the Site is located is of high landscape sensitivity to development, with very little scope to accommodate development. It acknowledges the impact of the recent construction of Newgate Lane East in reducing the integrity of the area but concludes that this would in fact increase the sensitivity of the area to further development.

The development proposals represent a large-scale residential development, which would act in combination with the recently approved scheme to the south to entirely eliminate the open character of the Woodcot/Alver Valley, and to reduce the rural component to a small collection of arable fields to the north of Peel Common, which are unlikely to remain viable as an agricultural unit. Whilst it is noted that a field in the western part of the scheme is proposed to be retained, this is anticipated to comprise a combination of public open space and engineered sustainable urban drainage features, and therefore its rural integrity would still be permanently lost.

The illustrative development design itself is a relatively bland and generic collection of perimeter blocks of residential development, and a significant proportion of the open space within the scheme is given over to storm water attenuation. Whilst a linear park is retained in association with an existing hedgerow, this is truncated in two places by main vehicle routes and flanked by another route, and it is further breached in three places by lesser access routes, therefore it is highly unlikely to function as an effective green infrastructure corridor. Other public access areas are restricted to corners of the scheme, where 'pocket parks' coincide with areas of planting for visual screening. All of these factors indicate that response to the prevailing character and the creation of high-quality places were not significant considerations in the design of this scheme.

Whilst it is noted that the planting proposals within the illustrative scheme would result in some reduction in the level of change within the landscape with time as it matures, it is unlikely that this will be to the extent that it would reduce the impact of development within this highly sensitive and inappropriate location to an acceptable level.

It is therefore concluded that the proposed development, by nature of its scale and design is inappropriate in principle within this highly sensitive location, and that it would bring about a significant and permanent adverse change in the character of the area and the complete loss of any remaining rural integrity. The illustrative scheme represents a generic design response to the character of the area, and fails to minimise landscape harm, or to recognise the inherent character and beauty of the countryside.

### **Consideration of Implications upon the Strategic Gap**

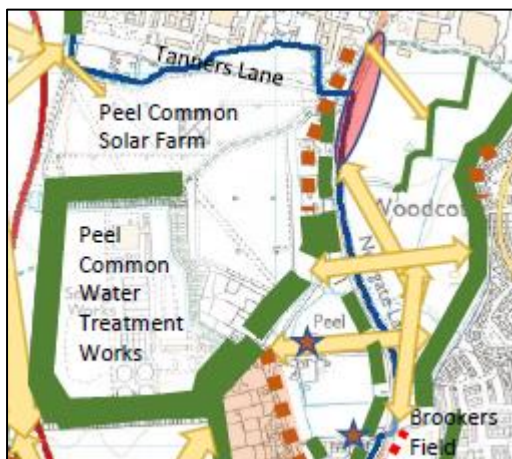
The Site is located within the Fareham-Stubbington Gap, and the stated purpose of the Study Area in which the Site is located (Area 8) is to prevent the coalescence of Fareham, Stubbington and Gosport.

The scale and location of the proposed development is such that it would result in significant coalescence between Fareham and Gosport, with only formal open spaces remaining in the space between these areas. This is anticipated to significantly reduce the integrity of the Strategic Gap in this location.

The Site currently performs an important role with regard to the perception of the Gap, in terms of the sense of leaving Fareham and entering the Alver Valley countryside when travelling south along Newgate Lane East, and this role will become more important with the delivery of the recently consented scheme to the south of the Site. The proposed creation of a new roundabout on Newgate Lane East is also anticipated to further urbanise this route and erode the perception of a pause between settlements.

The Council's recently published Technical Review of its Strategic Gaps identifies a number of important views across the Site, as illustrated on Figure 3 below, in particular between the urban edges of Woodcot and the ribbon development along Newgate Lane, with the open character of the Site emphasising the open, shallow nature of the Alver Valley. Furthermore, the belt of mature oak trees on the eastern boundary of the Site is identified as playing an important role in containing the urban character of Woodcot and separating it from its adjacent countryside.

**Figure 3: Extract from Technical Review of Areas of Special Landscape Quality and Strategic Gaps, showing important views (yellow) and screening vegetation features (green)**



The implications of the proposed development would be that these identified views across and along the Alver Valley would be lost, as would the sense of transition between the urban edge of Woodcot and adjacent agricultural countryside.

It is therefore concluded that the proposed development would fail to protect the integrity of the Strategic Gap, and would result in the physical and visual coalescence of Fareham and Gosport.

### **Considerations of Implications upon Visual Amenity**

The Applicant's assessment of visual impacts correctly identifies that the Site occupies a relatively restricted visual envelope, but that the proposed development would be visible from a number of highly sensitive receptors in its vicinity, including the users of Public Rights of Way and recreational facilities, and the occupants of private dwellings. It anticipates that a number of these receptors would experience adverse visual impacts of moderate to major significance upon completion of the scheme.

I do not agree that the measures enshrined within the illustrative development design would reduce the significance of effect upon these receptors to the extent stated by the Applicant by year 15 because the measures proposed are insufficient, and the species proposed to be used for screening planting are deciduous. As an example, the magnitude of change upon the users of the Meadow Walk Recreation Ground is judged to reduce from medium to low, even though no new planting is proposed along the northern edge of the scheme.

Whilst a number of potentially sensitive receptors have been identified to the south of the Site, I am in agreement with the Applicant that the delivery of the consented scheme to the south of the Site would reduce the level of change upon these receptors.

It is therefore concluded that the proposed development is likely to result in a number of permanent significant adverse effects upon visual receptors in the close vicinity of the Site, but that the restricted visual envelope of the Site is such that significant effects upon wider views are considered to be unlikely.

### **Conclusion**

Based upon the above analysis, it is my opinion that the proposed development would result in significant harm upon the local landscape character, the integrity of the Fareham-Stubbington Strategic Gap, and the visual environment, and it would result in the physical and visual coalescence of Fareham and Gosport. As such, it would fail to satisfy the requirements of Local Plan Policies CS22, DSP6 and DSP40 and paragraph 170 of the NPPF. It would also fail to satisfy the requirements of draft Strategic Policies DS1, DS2 and DS3 of the emerging Fareham Local Plan.

It is therefore recommended that the proposed development be refused planning permission.

**Ian Dudley BSc(Hons) MICFor CEnv CMLI**  
**22<sup>nd</sup> April 2022**