PURPOSE
To consider the role of the

RECOMMENDATION
That this Council

- Agree the principle of maintaining a settlement stratégic gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington as part of the forthcoming Gosport Borough Local Plan Review.

- Continue to support the necessity of maintaining the integrity of the Gap beyond the Borough boundary in order to prevent the coalescence of settlements and maintain their identity; and safeguard the Gap’s function as an effective transport corridor.

- That Fareham Borough Council are invited to work with this Council on a bilateral basis to consider a joint approach for the future of the Gap:
  - as part of the statutory duty to cooperate;
  - to secure it coherence over the longer term; and
  - to investigate options for delivering multi-functional benefits for residents of both Boroughs.

- Refer to the Gap as a ‘Strategic Countryside Gap’ in the Local Plan Review for reasons set out in Section 2 of this report.

1 Background

1.1 The current adopted Gosport Borough Local Plan (GBLP) (October 2015) includes a Settlement Gap policy (part 10 of Policy LP3) which aims to retain a sufficient gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington in order to protect the identity of each settlement and ensure proposals do not physically and visually diminish these open areas.

1.2 This settlement gap is considered of sub-regional importance and
was identified, together with three others, in the PUSH\textsuperscript{1} South Hampshire Strategy (Policy 15) (October 2012). The local boundaries, as defined on the Policies Map of the GBLP, were defined in cooperation with Fareham Borough Council (FBC) as part of the production of both current adopted local plans and consequently the gap is included within FBC’s current Local Plan (linked to Policy CS22 of Part 1 of the Fareham Local Plan: Core Strategy). A plan showing the current boundary of the gap is shown in Appendix 1. The gap within the Borough includes the Alver Valley, Browndown and playing fields associated with HMS Sultan and Bay House School.

1.3 The South Hampshire gaps are tracts of undeveloped land within the sub region which keep settlements separate from each other. The prevention of significant development within these Gaps has been a feature of strategic and local planning documents in South Hampshire for over 35 years.

1.4 In 2008 the PUSH Joint Committee adopted a Policy Framework which set out criteria for the designation of Gaps to ensure consistency across South Hampshire. It was recognised that Gaps which cross authority boundaries need a coordinated approach to ensure that their designation and their extent is aligned across the boundary.

1.5 The criteria to define the boundaries were included in Policy 15 of the South Hampshire Strategy (Oct 2012) (and therefore relevant to both the current Gosport and Fareham Local Plans). The criteria are as follows:-

• the designation is needed to retain the open nature and/or sense of separation between settlements;
• the land to be included within the Gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence;
• the Gap boundaries should not preclude the provision being made for the development proposed in this Strategy;
• the Gap should include no more land than is necessary to prevent the coalescence of settlements having regarding to maintaining their physical and visual separation.

1.6 The South Hampshire Strategy makes it clear that, ‘the purpose of Gaps is to shape settlement patterns and to influence the location of planned development; not to stifle it altogether. So the boundaries of Gaps must be defined in tandem with providing sufficient land to meet development needs.’

1.7 In June 2016 the PUSH authorities agreed the Spatial Position Statement (SPS) to inform long term decisions about the level and

\textsuperscript{1} Partnership for Urban South Hampshire
distribution of development in the area to 2034 taking into account requirements to plan for objectively assessed housing needs. The SPS has maintained a policy on Gaps which it recognises are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities.

1.8 The SPS only specifically identifies the Meon Valley Gap in Position Statement 1 as it demarks the boundary of the Portsmouth and Southampton Housing Market Areas. The SPS however recognises that in addition to this area, ‘Councils should identify in their Local Plans other local strategic countryside gaps of sub-regional importance as appropriate.’ It adds that, ‘Given the long term need for development, the number and extent of gaps should only be that needed to achieve their purpose.’

1.9 The justification text states that such gaps should be defined in order to prevent coalescence and protect the identity of distinct settlements and maintaining green infrastructure. They are a mechanism which still allows development to come forward in appropriate sustainable locations by giving communities the confidence to plan positively for growth, whilst ensuring there is room for the necessary complimentary uses such as recreation areas, transport corridors and environmental mitigation.

2 Terminology

2.1 The gaps designation is known by various terms in South Hampshire documents but importantly they are describing the same land use function. The 2012 South Hampshire Strategy refers to this designation as ‘Gaps’ in order to keep settlements separate from each other. Consequently the GBLP refers to these gaps as ‘Settlement Gaps’ whereas the Fareham Local Plan refers to them as Strategic Gaps which was the term formerly used. It is important to note that there is no difference whatsoever in the designation. They both relate to the Gaps designation in the South Hampshire Strategy. The PUSH Spatial Position Statement (June 2016) refers to the Gaps in Position Statement 1 as Strategic Countryside Gaps but also uses the term strategic gaps in the justification text. Similarly this is referring to the same designation.

2.2 It is proposed that the Gap policy in the forthcoming Gosport Borough Local Plan Review will be termed ‘Strategic Countryside Gaps’ to be consistent with PUSH Spatial Position Statement, recognising that this is only a change in terminology and that the role of the gap is unchanged.

3 Report

3.1 As part of the forthcoming Gosport Borough Local Plan Review which will cover the period to 2036 it will be necessary to review the detailed boundary of the Gap within Gosport Borough. This will be undertaken at the same time as the review of the urban area
boundary (as currently defined in Policy LP3 (point 2) and the Policies Map of the GBLP). However it is clear that the principle of the Gap remains applicable particularly when considering the criteria outlined by the previously agreed PUSH Framework on this issue.

3.2 The key issue however arises from concern regarding Fareham Borough Council’s commitment to the Gap given their latest proposal in the Draft Fareham Local Plan (DFLP) (Regulation 18) published in October 2017. As Members will recall FBC has proposed a significant new development allocation of up to 475 dwellings in land currently in the strategic gap to the east of the new Newgate Lane (Newgate Lane East). As part of this allocation it is proposed to remove this land from the strategic gap accordingly. This proposal is commonly referred to as ‘HA2.’ Appendix 2 shows how this proposal as well as a number of speculative housing developments could significantly be detrimental to the function of the gap both individually and cumulatively.

3.3 In response to the DFLP, this Council resolved (Regulatory Board 6th December 2017) to make a strongly worded objection to the HA2 proposal and the need to defend the gap, which was consequently duly made. Key elements of the Council’s case with reference to the Gap are set out in Appendix 3. Numerous other points referring to other issues relating to the proposed housing allocation were also made and can be viewed in the aforementioned Regulatory Board report. These key issues include:

- that the proposal will negate the benefits being provided by the new 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 has the potential to 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 potentially increase traffic on residential roads;

- there is insufficient information on supporting infrastructure including education, medical and community facilities.

3.4 The extract in Appendix 3 identifies that this Council has a number of concerns and concludes that 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 character of the gap and will diminish the physical and visual separation of the settlements.
3.5 The Council considers that FBCs proposals are contrary:

- to the objectives of the long-established sub-regional policy in South Hampshire to protect important gaps between settlements.

- to FBC's own evidence, submitted at its own Local Plan Examination in Public as recently as 2015 which defends the gap at this particular location.

- to the Planning Inspector findings in 2015 who states in his report, "although the review [of the Strategic Gap] 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."

- to FBC's own Landscape Assessment (2017) evidence used as part of the DFLP which states '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.'

- to its own Sustainability Appraisal which highlights that that Newgate Lane allocation is less sustainably located than other allocations in the DFLP.

3.6 In addition to the HA2 proposed allocation, the Gap is also under further pressure from a speculative development of 1,027 dwellings at Newlands Farm with associated community facilities. The planning application has yet to be determined and is contrary to both the current Fareham Local Plan and the emerging DFLP.

3.7 Also of concern is that a perspective developer is considering further development between Newgate Lane East and the original Newgate Lane citing the fact that as FBC has allocated the HA2 in the draft Local Plan it would release the potential for further development to take place.

3.8 In the light of the above identified pressure it is of paramount importance that Gosport Borough Council seeks to maintain the existing Gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington. The Council recognises that the development of
transport infrastructure within the Gap, such as the Newgate Lane improvements and the proposed Stubbington Bypass, are compatible uses within the Gap as part of the acknowledged transport corridor function of gaps (as identified in the PUSH SPS). The Council considers that significant new residential development along this new infrastructure has the potential to significantly reduce its effectiveness as a key transport route serving the Peninsula.

3.9 It is acknowledged that the pressure on the Gap has been caused by the significant housing needs in South Hampshire and the various measures introduced by the Government to increase the rate of house building. This includes the new standardised methodology for calculating housing need and the housing delivery test recently confirmed in the Government’s National Planning Policy Framework (NPPF) (July 2018), together with the previous measure of the ‘Five Year Housing Supply’, which Fareham Borough has not been able to meet.

3.10 It is important to recognise that this Gap has been a very established planning strategy for PUSH and its various sub-regional planning documents in order to maintain such important spaces within the wider densely built-up areas of South Hampshire.

3.11 Gosport Borough Council strongly supports Position Statement S1 on Strategic Countryside Gaps in the PUSH Spatial Position Statement (June 2016) and considers that the principle of the Gap should be maintained in the forthcoming Local Plan Review and it should seek to protect the integrity of the wider gap beyond the Borough boundary. Consequently it will continue to make representations to FBC in relation to the HA2 proposal as well as making comment on planning applications which have a detrimental impact on the sub-regional gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington and its ability to function as an effective transport corridor for the Peninsula.

3.12 In the light of this and as part of both Councils’ statutory duty to cooperate, as well as the new requirement to produce a ‘statement of common ground’ (introduced by the NPPF), it is considered appropriate to invite Fareham Borough Council to consider establishing a joint approach to the Gap which protects its key functions as established by PUSH. This could potentially lead to a joint strategy for the gap which could assist in implementing multi-functional benefits for the residents of both Boroughs.

4 Risk Assessment

4.1 It is considered necessary to maintain a policy position in the forthcoming Local Plan to protect the Gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington to prevent coalescence and maintain the identity of each settlement. It is
important that Gosport Borough Council defends the integrity of the gap and makes appropriate representations to Fareham Borough Council where appropriate. Failure to do so could have a detrimental impact on the potential for the gap to function as an effective transport corridor, and deliver environmental, recreational and landscape benefits.

<table>
<thead>
<tr>
<th>Financial Services comments:</th>
<th>None</th>
</tr>
</thead>
<tbody>
<tr>
<td>Legal services comments:</td>
<td>None</td>
</tr>
<tr>
<td>Equality and Diversity</td>
<td>An Equality and Diversity Assessment on the Settlement Gap Policy in the GBLP was undertaken as part of the Examination in Public process and is available to view. A similar assessment will be undertaken as part of the forthcoming Local Plan Review.</td>
</tr>
<tr>
<td>Council Plan:</td>
<td>Maintaining the gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington will assist in developing the economy by maintaining, and enabling opportunities to enhance the transport corridors through the gap; whilst the development of such areas for residential would place significant pressure on the transport infrastructure and would significantly undermine the effectiveness of recent and proposed improvements. Maintaining the gap may also offer opportunities to enhance the environment.</td>
</tr>
<tr>
<td>Risk Assessment:</td>
<td>See Section 4</td>
</tr>
<tr>
<td>Background papers:</td>
<td>None</td>
</tr>
</tbody>
</table>
| Appendices                    | Appendix 1: The current Settlement/Strategic Gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington  
Appendix 2: Potential for the Strategic Gap to be reduced by the HA2 proposal and current speculative housing developments  
Appendix 3: Extract from Regulatory Board (6th December 2017) on Draft Fareham Local Plan (Reg 18) relating specifically to the Strategic Gap in relation to the HA2 allocation. |
| Report author/Lead Officer:   | Jayson Grygiel, Manager of Planning Policy |

Appendix 1:
The current Settlement/Strategic Gap between Gosport, Fareham, Lee-on-the-Solent and Stubbington
Appendix 2: Potential for the Strategic Gap to be reduced by the HA2 proposal and current speculative housing developments
Appendix 3: Extract from Regulatory Board (6th December 2017) on Draft Fareham Local Plan (Reg 18) relating specifically to the Strategic Gap in relation to the HA2 allocation.

Strategic Gap

5.6 In order to accommodate the Newgate Lane residential allocation the DFLP proposes to amend the Strategic Gap between ‘Fareham/Bridgemary and Stubbington/Lee-on-the-Solent’, 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.

5.7 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.

5.8 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.

5.9 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.

5.10 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 justifiably alter 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.’
5.11 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/Bridgemary 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 Bridgemary along with maintaining the separate identify of Peel Common.’ This therefore appears to contradict the removal of the Newgate Lane area from the Strategic Gap.

5.12 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.’

5.13 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.

5.14 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.