

Eastleigh Local Plan

Main Modifications Representations

July 2021



Contents

	Page
1. Introduction	4
2. Relevant Planning History	5
3. Landscape Analysis	11
4. Summary and Conclusions	19

Appendices

1. Sovereign Drive Appeal Decision Letter	20
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Client

Vivid Housing Limited

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Cover: photograph looking west from northern parcel taken on site visit on 12/02/2021.

1.0 Introduction

- 1.1 Gillings Planning have been instructed by our client VIVID Housing Limited to prepare these Representations on the proposed Main Modifications to the Eastleigh Local Plan.
- 1.2 These Representations relate to their interest in land to the rear of Sovereign Drive and Precosa Road, Hedge End, Southampton, Hampshire (the Site) and a current appeal proposal which relates to a proposed residential development comprising 106 no. dwellings, new access from Sovereign Drive, associated landscaping and drainage works following demolition of no. 47 Sovereign Drive and Hatts Copse House (net 104 no. dwellings).
- 1.3 An appeal was lodged (the Appeal) pursuant to Section 78 of the Town and Country Planning Act 1990 (as amended) against the decision of Eastleigh Borough Council (EBC) as the Local Planning Authority (LPA) to refuse full planning permission in respect of the above scheme; reference: APP/W1715/W/21/3269897 (the Appeal Proposal).
- 1.4 Crucially, as is set out in these representations, the site did benefit from planning permission for a very similar development to that described above; which was granted on appeal, but has since lapsed. During the course of the appeal there was considerable debate about the extent of, and the virtues of the gap within which the site was once sited.
- 1.5 These representations relate to the Eastleigh Borough Countryside Gaps Study prepared by Deacon Design (Examination Document 84) and Main Modification 27. Specifically these representations relate to the attempts by EBC to rewrite history and now propose that the site should be retained as a gap; for which we feel there is no merit whatsoever.
- 1.6 We fundamentally disagree with any attempts to designate the site as gap for reasons set out within these representations.

Vivid

- 1.7 VIVID Housing Limited (Vivid) is registered in England and Wales as a registered society under the Co-operative and Community Benefit Societies Act 2014 under number 7544 with exempt charitable status and as a registered provider of social housing with the Regulator of Social Housing under number 4850. Vivid are authorised by the Financial Conduct Authority, number 776452.

1.8 From their registered offices in Portsmouth, Vivid are a leading provider of affordable homes and housing-related services in the south of England. Vivid build homes for social and affordable rents for those on the lowest incomes and provide a choice of shared ownership developments, which allow local people to take their first steps on the ladder.

1.9 Vivid are also building homes for the open market and the income made from these is put back into building more high-quality, affordable homes for people who need them.



1.10 Vivid have secured many awards, including the title of Housing Association of the Year in the What House Awards in 2019.

The Author

1.11 These Representations have been prepared by Daniel Wiseman, a Director at Gillings Planning and Chartered Town Planner with over 20 years of planning experience in both the public and private sectors.

1.12 Gillings Planning was founded in 2017, and has grown organically to a team of ten; comprising seven full-time staff and three part-time staff; seven of whom are Chartered Members of the Royal Town Planning Institute (RTPI), and one who is currently applying to join the RTPI. This organic growth has arisen due to high levels of repeat business from satisfied clients who appreciate our honest advice.

1.13 As a practice, we are actively involved in many projects, ranging in scale from a handful of dwellings up to a 2,000 home urban extension and associated community infrastructure in Westgate-on-Sea in Kent.

1.14 Daniel is a resident of the Borough of Eastleigh, living in West End and knows the Borough well. Daniel has worked on several planning projects in the Borough over the years including the preparation of a development brief for the Council for Hatch Farm in West End; leading on a Reserved Matters application for 889 dwellings and associated infrastructure at Boorley Green and he worked on the Strategic Growth Option whilst employed at WYG. Daniel therefore has a keen understanding of the Council's planning policy and development management processes.

2.0 Relevant Planning History

2.2 We consider that some aspects of the site's planning history are relevant to these representations because the gap has already been considered in detail by officers, Members and a Planning Inspector; a brief summary is set out below:

The Original Application

2.3 A planning application seeking full planning permission for a “residential development comprising 106 dwelling units, new access from Sovereign Drive, new roads, public open space, landscaping and drainage works following demolition of 47 Sovereign Drive, 1 Precosa Road and Hatts Copse House (net 103 dwellings)” was submitted to Eastleigh Borough Council (EBC) as the Local Planning Authority (LPA) on 15th November 2013.

2.4 The application was validated on 2nd December 2013 and assigned the LPA reference number: F/13/73606. The applicant was Bewley Homes Plc who have now transferred their interests in the appeal site to Vivid. The application was presented to the Hedge End, West End and Botley (HEWEB) Local Area Committee (LAC) on 16th June 2014 with a recommendation made by officers to refuse the application.

2.5 The application was refused by the HEWEB LAC and a decision notice was issued on 9th July 2014 which contained five reasons for refusal. Reason 2 related to affordable housing, reason 3 related to developer contributions, reason 4 related to nitrate neutrality, and reason 5 related to highways matters. Only reason 1 related to landscape considerations, and it is set out below.

- 1.) The proposal represents an inappropriate and unjustified form of development beyond the built up area which will cause an urbanising impact on the designated countryside and will physically and visually diminish the Local Gap between Hedge End and Botley. As such the proposal is contrary to saved Policies 1.CO and 3.CO of the Eastleigh Borough Local Plan Review, (2001-2011) and emerging policy S9 of the Revised Pre-submission Eastleigh Borough Local Plan (2011-2029).

2.6 The decision was the subject of a subsequent planning appeal, lodged on 19th January 2015. A four-day Inquiry was held in July 2015; the appeal was allowed.

2.7 For ease of comparison between the Proposed Site Layout Plans of the Allowed Appeal Scheme and the current Appeal Proposal, they are reproduced on the following pages.

2.8 The Appellant considers that paragraphs 13, 40, 41, 44 and 45 of the Inspector's Decision Letter dated October 2015 are particularly relevant to these representations, they state:

13. *...It is common ground that the local plan is out-of-date as far as housing land supply is concerned. Despite that generality of agreement, it is not common ground that the two policies cited by the Council in its first reason for refusal are policies relevant to the supply of housing, as the appellant maintains, and hence out of date also for the purposes of paragraph 49 the Framework. The policies in question are 1.CO concerning protection of the countryside and 3.CO which aims to protect designated Local Gaps. The matter of how to approach these policies was the subject of extensive legal submissions.*
40. *For the above reasons, I consider that the effect of the proposed development on the character, appearance and utility of the countryside would be comparatively limited in terms of the actual harm that would result in the context of local plan policy 1.CO and national policy objectives in respect of countryside protection. Moreover, for the reasons I have given in this particular regard, the proposed development, considered on its own specific merits, poses no substantial threat to the maintenance of the separate identities of Botley and Hedge End. As a consequence, its impact on the effectiveness of the local gap between the two settlements, as defined for the purposes of policy 3.CO of the local plan, would in my estimation be limited. All in all, therefore, despite the weight I accord to the intentions of policy 3.CO,23 the overall effect of the proposal on the intentions of relevant local and national policy to protect the countryside and the identity of settlements would, in practice, be correspondingly limited, thereby reducing the weight I accord in this instance to the conflict with such policy I have previously acknowledged.*
41. *The appeal site is sustainably located adjacent to the existing residential area of Hedge End and the planning obligation is drafted to mitigate impact on the transport network. On the basis that relevant policies for the supply of housing land, notably policies 1.CO (certainly to the extent that it constrains housing land supply) and 70.H, are out-of-date, the presumption in favour of sustainable development is engaged pursuant to paragraph 14 of the Framework, notwithstanding conflict with the intentions of the development plan to protect from most forms of development the countryside beyond the urban edge defined and the local gap, specifically, between Hedge End and Botley.*

44. *As far as the appeal site is concerned I am not persuaded on the evidence that it has features that would place it in the category of being a valued local landscape in the sense intended by the Framework. 'Valued' does not of course equate to designated and most open land adjacent to residential areas has a value to local residents. The site can be appreciated in the public realm from a short section of Footpath 18, but in the main is a visually contained series of paddocks on the margins of a broader area of open countryside with more significant qualities, both aesthetically and in terms of its contribution to the intended separation of Hedge End and Botley. Moreover, the proposed development is well designed for the circumstances of the site, with consequential enhancements in terms of permeability, access to open space and biodiversity. Consequently, the environmental harm would be relatively limited and, notwithstanding the conflict with the intentions of the development plan insofar as it would impinge on countryside within an identified local gap, I do not consider, having taken all the relevant factors into account, that the harm to the environmental objects of the development plan in those respects would be sufficient to render the proposed development unsustainable in the sense alluded to in the Bloor Homes case cited by the Council.*
45. *On the contrary, I am, for the reasons I have given, clear in my mind that the adverse environmental impacts of developing the site (taking into account the mitigation measures that can be secured through the planning obligation and appropriate conditions) would not significantly and demonstrably outweigh the considerable social and economic benefits, when assessed against the policies of the Framework taken as a whole. Therefore, in those terms, the development is sustainable and it follows that permission should be granted.*

- 2.9 The full appeal decision letter is attached to this statement as **Appendix 1**.
- 2.10 The current appeal relates to a subsequent planning application that was recommended for refusal by officers and subsequently refused by the Hedge End, West End and Botley Local Area Committee on 13th October 2020; eight reasons for refusal were cited on the decision notice.
- 2.11 Reason 2 relates to the means of access to the site; reason 3 relates to the layout of the proposed development; reason 4 relates to the lack of a link to the public right of way, reason 5 relates to potential impacts on trees, reason 6 related to potential impacts on

biodiversity, reason 7 relates to surface water drainage and reason 8 relates to developer contributions.

2.12 Only reason 1 relates to landscape considerations. Reason 1 states:

- 1.) The proposed development, for which there is no overriding need, would result in a visually intrusive development that would have an unacceptably urbanising impact on the countryside and surrounding area and would physically and visually diminish the local gap. The proposal is therefore contrary to Saved Policies 1.CO, 3.CO and 59.BE of the adopted Eastleigh Borough Local Plan 2001-2011; Draft Policies S1, S7 and DM1 of the submitted Eastleigh Borough Local Plan 2016-2036; and the provisions of the NPPF.

3.0 Landscape Analysis

3.2 In preparing these representations, our client has appointed 'UBU Design' Landscape Architects to objectively assess the Site and the Gap Study as a 'fresh pair of eyes'. Paul Gray of UBU has supported the preparation of this section of these representations.

Site Context

3.3 In summary, the Site currently consists of a series of pastoral fields used as horse paddocks, separated by hedgerows with dense tree planting, and also containing a farm property, associated stables and sheds and areas of hardstanding. The Site also incorporates a single dwelling on Precosa Road to the west through which access for the new development proposed. A public right of way (Public Footpath FP18) runs east-west to the north of the site and a recreation ground adjoins the southern edge of the Site, separated from the Site by a row of trees.

3.4 The Site is surrounded by the residential edge of Hedge End to the west, which consists of two-storey detached and semi-detached houses along Sovereign Drive and Precosa Road, and whose rear garden curtilages overlook the site. A single dwelling with ancillary buildings lies to the immediate north-east of the Site. To the north, east and south the Site is surrounded by countryside, consisting of small to medium sized pastoral fields bordered by hedgerows with dense and mature hedgerow tree cover creating a small-scale, intimate landscape with little opportunity for visibility across it.

3.5 The village of Botley lies to the north-east of the Site, and a ribbon of development extends along Brook Lane to the east of the Site. There are also a number of developments within the countryside that appear to be former farms that have diversified to provide premises for small businesses.

3.6 In terms of local policies and landscape designations, the Site is not subject to any national policies or designations that would indicate it is valued for its landscape quality or condition, such as an Area of Outstanding Natural Beauty, Green Belt, or Local Green Space.

3.7 Locally, the Appeal Site is identified as Open Countryside (Policy 1.CO) and within a Local Gap (Policy 3.CO) within the adopted Local Plan 2001-2011 and was a housing allocation site (Draft Policy DM24) within the Submission Version Eastleigh Borough Local Plan 2016-2036.

3.8 Within the submission version of the emerging Local Plan, a 'countryside gap' (Draft Policy S8) was designated between Hedge End and Botley, for the purposes of maintaining the separate identity of these settlements, within which development must not physically or visually diminish the gap or have an urbanising effect detrimental to its openness. The Site was not included within the countryside gap designation between Hedge End and Botley as can be seen in the extract of the submitted Proposals Map (Submission Version) shown below:

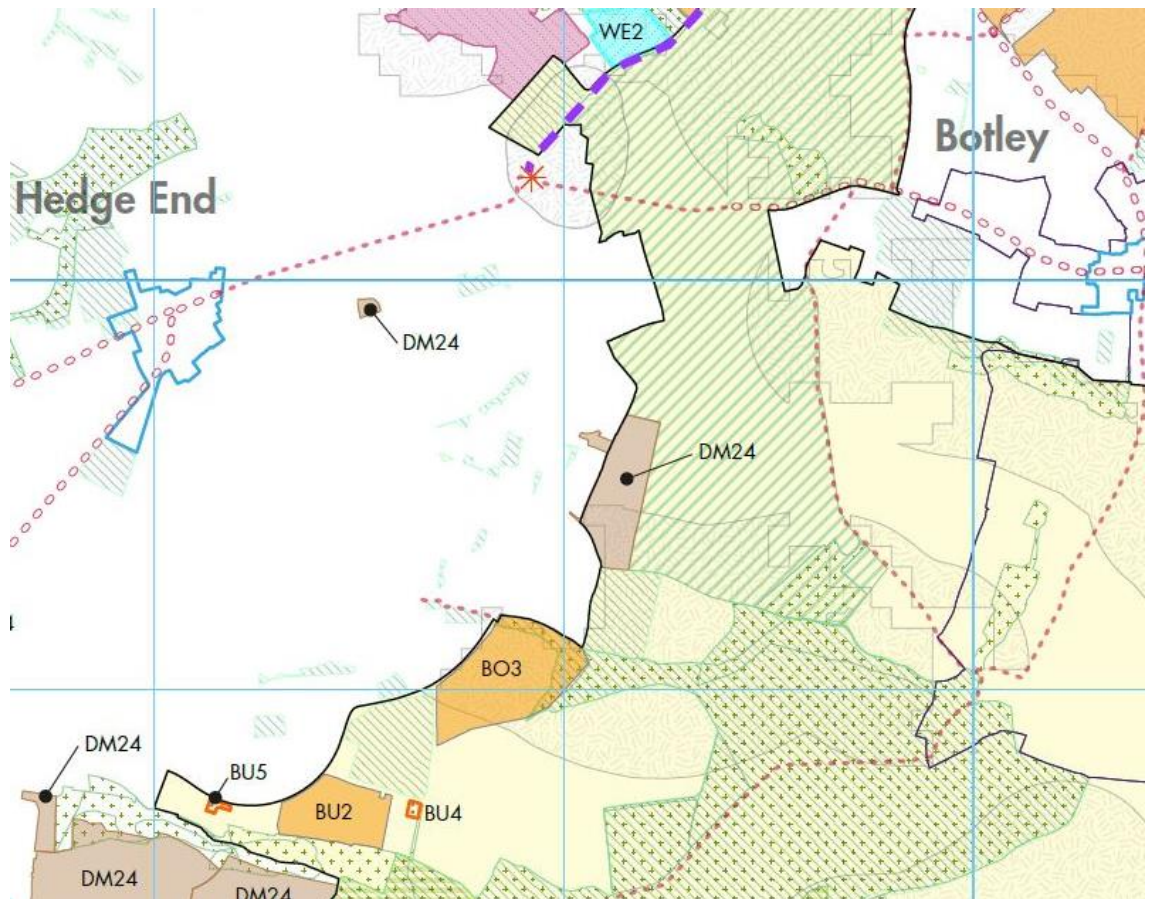


Figure 3.1 | Extract from submitted Proposals Map for Eastleigh Borough Local Plan 2016-2036

Criticism of EBC's Gap Approach

3.9 We note that the Local Plan Inspector identified concerns with the Emerging Local Plan, including EBC's approach to the retention of local gaps.

3.10 Following the Local Plan Examination in Public, and in her letter dated 1st April 2020, the Inspector wrote to EBC and advised:

- 3.11 At Paragraph 26 – “Gaps proposed between settlements are referred to under various names throughout the evidence base. I shall use the term settlement gap within this letter.”
- 3.12 At Paragraph 27 – “I have significant concerns regarding the approach adopted to the settlement gap strategy overall as contained within the plan and how this has been applied to the site selection process for the SGO. My concerns in this regard fall into three broad areas: the evidence base, the application of the approach to site selection and finally the detailed policy wording. I deal with each of these matters in turn.”
- 3.13 At Paragraph 30 – “The general principle of settlement gaps to prevent the coalescence of settlement is broadly supported by national policy. However, the extent to which the designations as proposed extend throughout the borough and take full account of both (i) and (ii) above is neither logical nor supported by a robust evidence base. For example, in the hearing sessions there was much discussion concerning the extent of individual gaps, the ‘narrowness’ or ‘broadness’ required to function as an ‘appropriate gap’, the needs for a ‘strong/decent/clear gap’ in certain areas but ‘slivers’ of gaps being designated elsewhere. The evidence base does not support the approach adopted. Whilst there may well be some merit in the arguments put forward that the areas surrounding the urban area of Southampton require a greater gap in ‘size’ terms proportionate in scale to the urban area of Southampton, the same logic is not applied to other settlements within the borough.”
- 3.14 At Paragraph 31 – “Moreover, this approach is neither consistent with the evidence base nor the PUSH work upon which the appraisal purports to be founded. In some cases, more land than is necessary to prevent settlements from coalescing has been included, in other locations it is not clear how the settlement gap as defined provides an important role in defining the settlement character. As a result, there remains no rigorous or comprehensive basis for the gap designations as illustrated, the choice of the locations and the extent of the designations as shown.”

The Gap Study

- 3.15 The Eastleigh Borough Settlement Gap Study published in October 2020 sets out the Council’s analysis of the gap between settlements, including the countryside gap designated between Hedge End and Botley which is identified as ‘Area I Botley, Hedge End, Boorley Green’. Again, the Site is not included within the gap within the Gap Study document:

Gap Analysis - Area I Botley, Hedge End & Boorley Green

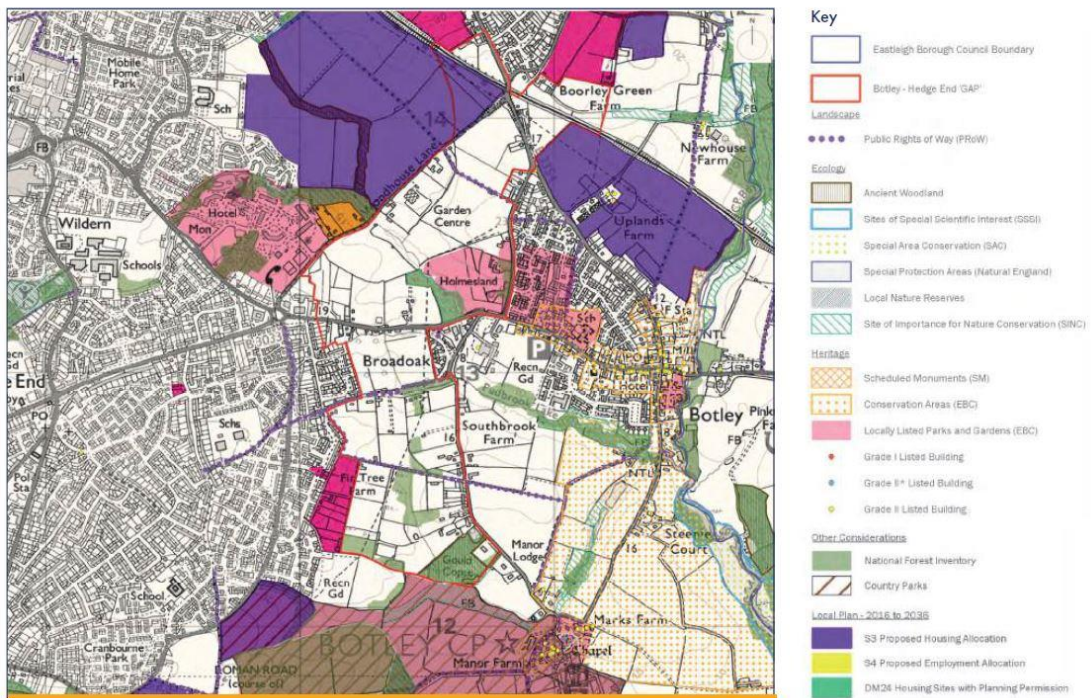


Figure 12 - Area I Botley, Hedge End and Boorley Green - Designations Plan

Figure 3.2 | Extract from EBC Settlement Gap Study for Area I Botley, Hedge End and Boorley Green

3.16 The gap study includes a description of the landscape features of each gap, stating that Area I consists of enclosed small-scale paddocks to the south, which is referring to the area south of the A334, and includes the land adjoining the Site. The Study states that within this area *“Dense tree belts and woodland, combined with varying field boundaries, also influence its sense of openness and largely prevents intervisibility between the settlements”*, which is consistent with the Site context described above. The lack of intervisibility between the settlement edges owing to the intervening landscape qualities between Hedge End and Botley was agreed upon by both sides and by the Inspector in the previously allowed appeal for the site.

3.17 The consent associated with the previous appeal for the Site has now lapsed, and the policy wording of emerging policy DM24 states that in instances where consents have lapsed, sites will be subject to the remaining policy requirements of the Local Plan. We note that Main Modification 116 proposed by EBC in July 2019 has struck out ‘Land East of Sovereign Drive’ from the list of consented sites, but the Appellant notes that the Local Plan Inspector has found fault with the Council’s approach to the designation of settlement gaps, and the Council has since prepared new evidence, which remains before the Inspector for consideration. Also of note is the fact that the site has previously been considered capable of accommodating residential development in principle by virtue of the allowed appeal in 2015 (Appeal Ref: APP/W/1715/W/14/3001499).

3.18 However, the Gap Study published in 2020 sets out a clear intention by the Council to reinstate the Appeal Site within the Area I gap, for which the Council's justification to depart from the 2015 appeal decision is based on that appeal decision being made due to a lack of 5-year housing land supply at the time. There was in fact more context to the appeal decision than simple the lack of 5-year housing land supply outweighing other matters, as indicated by the Inspector in his conclusion on matters relating to the settlement gap whereby, he stated that "the proposed development, considered on its own specific merits, poses no substantial threat to the maintenance of the separate identities of Botley and Hedge End. As a consequence, its impact on the effectiveness of the local gap between the two settlements, as defined for the purposes of policy 3.CO of the local plan, would in my estimation be limited." This has not been acknowledged within the Gap Study.

3.19 Additional analysis below is drawn from previous considerations of the merits of the site being classified as gap.

Visual Intrusion and Urbanisation of the Countryside

3.20 In relation to visual intrusion, the Site is viewed by only a very small number of users, within a very limited geographical area, extending to the residential edge of Hedge End to the west, a short section of Public Footpath FP18 to the north, and heavily filtered views from the recreation ground to the south.

3.21 The open countryside to the immediate east of the Site is restricted from view by the heavily vegetated part of the eastern boundary of the Site, and where there is currently a gap in that vegetation, it would be restricted by intervening hedgerow vegetation beyond. The countryside area to the east of the Site is not publicly accessible so opportunities to view the settlement edge of Hedge End are not possible for the public.

3.22 Along the footpath to the north of the site (FP18), the visual experience varies east to west, with sections of the route more enclosed by vegetation and urban form than others. Adjacent to the Site the footpath is at its most urbanised already with visibility extending across the open paddocks within the Site, towards a heavily treed backdrop and with direct and unobstructed sight of the rear elevations and gardens of houses along Precosa Road. A residential property to the north-east of the Site represents the eastern-most extent of urban form at Hedge End for users of this route, beyond which the route becomes open again visually for a very short section with views across the open fields to the south and north, before then becoming enclosed by woodland and tree planting as it leads towards Brook Lane to the east.

3.23 The visual context of FP18 is corroborated by the Inspectors commentary within the 2015 appeal decision whereby he stated:

“The principal route across the local gap would pass the narrow northern boundary of the proposed development in a fringe area which is already interrupted by development at Fir Tree Farm and the neighbouring property to the north of Footpath 18. Thereafter, rapid access to the deeper countryside towards and beyond Brook Lane would still be very readily achieved as would informal access to the land characterised by bracken and woodland to the east of the site. Especially as the proposed landscaping matures, the relative visual containment of the site, hugging the eastern margin of Hedge End, would serve to minimise any sense of incursion into the rural land within the gap and the greater permeability of the residential environment facilitated by proposed footpath connections to Little Hatts Recreation Ground, Footpath 18 and the landscaped eastern margin of the proposed development would actually bring greater opportunities to appreciate the rural prospect to the east into the public domain. In my estimation, this would capitalise on an opportunity to improve the character and quality of the area and the way it functions (relative to the adjacent countryside) in the manner encouraged by the Framework.”

3.24 The recreation ground to the south is already heavily filtered from view by intervening trees. It is likely that there will be a perception of the settlement edge extending eastwards but given the context of existing filtered visibility of the urban edge of Hedge End to the west and north-west from this location, a consolidation of the settlement edge eastwards is unlikely to have an overly urbanising effect on users of this public asset. Furthermore, the Appeal Proposals set out to incorporate a landscape buffer to the south with new native planting proposed, which should further limit the potential for the development within the Appeal Site to be seen.

3.25 The settlement edge of Botley to the north-east of the Site is restricted from view by extensive intervening field boundary vegetation and blocks of woodland. If Brook Lane in time were to become a part of Botley, even then the potential for intervisibility between the two settlement edges would be limited due to the extensive woodland and field boundary vegetation already present between Brook Lane and Hedge End.

Weak Evidence

3.26 We consider that the Council’s evidence related to the justification for the re-inclusion of the Site within the emerging countryside gap policy of the submitted Local Plan is weak and it must also be noted that:

- there is a distinct lack of intervisibility across the two settlement edges of Hedge End and Botley already;
- the removal of the Site from the gap as envisaged by Deacon Design who authored the Gap Study would not diminish the existing lack of intervisibility between the two settlement edges, and as an Inspector has opined previously, any development on the Site could in fact strengthen it through the provision of a soft landscaped, robust settlement edge defined by a landscape buffer rather than a hard residential edge; and
- the retained gap would not be affected visually or physically as the intervening vegetation is such that there is no sense of the land within the Site from anywhere beyond its immediate boundaries, and the same would apply to development within it.

3.27 There has not been any change in the landscape and visual context of the Site since the 2015 appeal, in which the Inspector stated that the countryside would remain intact and the function of the gap would continue to prevent coalescence:

“The lack of intervisibility between the settlements agreed by the landscape witnesses for both parties is but one facet of the manner in which the gap currently functions. Their evidence in that respect, and the evidence of my own experience of the situation on the ground, leads me to the conclusion that not only would the relatively narrow area of development proposed not be perceived as a major incursion into the gap but it would not in reality be so. The broad area of countryside remaining would be substantially the same as it is now and the overall function of the gap in preventing physical coalescence of the separate settlements, whilst maintaining the essentially open nature of the countryside in between them, the settlement character of the area and sense of separation, would not in my assessment be significantly compromised by the specifics of the proposal. This is an essentially well designed scheme with generous open space and landscaping to the eastern margin in particular. Because it is of shallow depth, being constrained by, amongst other factors the eastern pipelines, the extent of the development is limited and the sense of incursion into the gap would correspondingly be reduced, albeit evident to local people presently accustomed to the open nature of the land within the appeal site.”

3.28 Similarly, the Inspectors commentary within the 2015 appeal decision relating to the visual context of the gap between Hedge End and Botley is still relevant to the context of the gap today:

“The appeal site does not impinge on the narrowest part of the gap which I have previously identified. It lies well to the south of that and is, moreover, offset from the main settlement of Botley as defined on the proposals map for local plan policy purposes (albeit I accept that the ribbon of development along Brook Lane within the open countryside is part of the Botley community). During the course of my site visit I walked across the gap towards the southern fringe of Botley (as defined on the proposals map) via footpaths 18,10 and 11, crossing Brook Lane en route. Owing to a combination of vegetation, land management, subtle but effective topographic variation and (by no means least important) the actual distance, it was very clear to me that there is a substantial separation between Botley and Hedge End here, both in reality and in terms of how that reality is experienced on the ground. The sense of separation is little diminished by the intervening development along Brook Lane, the nature of the countryside differing somewhat in character on either side of that highway, being intimate and enclosed towards Hedge End but more open and arable, with larger fields, towards Botley. In any event, the local plan intention is to physically separate the main built up areas of the two settlements, as defined, irrespective of intervening landscape qualities although, inevitably, these must affect the manner in which that actual separation is perceived as an effective outcome of planning policy.”

4.0 Summary and Conclusions

4.2 Overall, we consider that it has been demonstrated on appeal that the development of the site is a sensible and logical settlement extension into an area of paddock land, well-contained by existing hedgerow vegetation and the urban settlement edge both visually and physically. The site would only be perceived from only a very localised geographical area, and due to the surrounding context and lack of intervisibility with any wider area, the Site does not contribute to the policy objectives of the existing Local Gap or proposed countryside gap to such an extent that the proposed development would alter the perception of the respective settlements of Hedge End and Botley, nor would it result in their coalescence, or the urbanisation of the intervening countryside between these settlement edges.

4.3 This stance was set out previously by the Inspectors decision on the 2015 appeal, in which he stated that:

“...the effect of the proposed development on the character, appearance and utility of the countryside would be comparatively limited in terms of the actual harm that would result in the context of local plan policy 1.CO and national policy objectives in respect of countryside protection. Moreover, for the reasons I have given in this particular regard, the proposed development, considered on its own specific merits, poses no substantial threat to the maintenance of the separate identities of Botley and Hedge End. As a consequence, its impact on the effectiveness of the local gap between the two settlements, as defined for the purposes of policy 3.CO of the local plan, would in my estimation be limited. All in all, therefore, despite the weight I accord to the intentions of policy 3.CO, the overall effect of the proposal on the intentions of relevant local and national policy to protect the countryside and the identity of settlements would, in practice, be correspondingly limited, thereby reducing the weight I accord in this instance to the conflict with such policy I have previously acknowledged.”

4.4 The landscape and visual context of the Site and the gap between the settlement edges of Hedge End and Botley has not changed fundamentally since that decision, and the lapsing of the consent associated with the allowed appeal does not have landscape or visual grounds to merit the Site now becoming part of a gap.

4.5 We object to any attempts to modify the proposed Countryside Gap in the Local Plan via the Eastleigh Borough Countryside Gap Study and the resultant proposed Main Modification 27.

4.6 We can find no reason that the Site should form part of any proposed settlement gap.

Appendix 1 | Sovereign Drive Appeal Decision Letter