

Persimmon Homes South Coast response to Eastleigh Local Plan consultation on main modifications

July 2021

Version: 1

Version control	Name	Date
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MM10: Strategic Policy S2 (Approach to New Development)

1. Persimmon Homes South Coast (PHSC) put forward an argument in favour of an uplift to the housing target set out in its response to matter 1 of the inspector's matters, issues and questions. Rather than re-emphasising the points made, PHSC notes from MM10 that the Council seeks to maintain the plan's housing target, choosing not to make an adjustment in light of the publication of the 2018-based household projections. The 2018-based projections would see a reduction in household formation rates compared with the 2014-based projections, on which the local plan's housing target is based.
2. The inspector's letter to the Council of 4th August 2020 (ED75)¹ asked the Council whether the publication of the updated projections would lead to a 'meaningful change' to the housing situation, as per ref. ID:2a-016-20150227 of the Planning Practice Guidance and therefore whether the housing target should be adjusted accordingly. The Council's response (ED77)² rightly argues at paragraph 6c that even if the housing target were rewritten, there would still be insufficient allocations in the plan to meet the revised target. The Council also points out that the government has issued a clear message to boost housing delivery, which would not be achieved by a downward adjustment of the figure. Notwithstanding PHSC's overall objection to the housing target set out in its response to matter 1, the Council's reasoning in respect of MM10 points towards maintaining the existing figure, which PHSC supports.
3. Furthermore, PHSC would argue that other factors such as affordability and the wider unmet needs of the PFSH authorities, means that lower numbers in Eastleigh would lead to increased pressure for neighbouring authorities to meet unmet needs under the Duty to Cooperate.
4. It is also important to bear in mind the Council's commitment to an early review of the plan under MM11, which means that the housing target would be looked at afresh and adjusted accordingly in the near future. That seems like a more pragmatic way forward, in PHSC's view, and PHSC supports the Council's approach to not downwardly adjusting the submission plan's housing target.

MM11: Strategic Policy S3 (Location of New Housing)

5. PHSC notes that, as promised by the Council, a housing trajectory is now proposed to be added to the plan. This is to be read in conjunction with the Housing Supply Update July 2020 (ED101)³, which sets out the sources of supply in various appended tables.
6. PHSC sees that table 4 includes a number of sites that benefit only from outline permission and yet are included within the five-year supply, some with imminent completions promised.
7. Of particular note is site ref. 0359 (Fir Tree Farm), which benefits from outline planning permission ref. O/16/79354 for 450 homes. The Council's Housing Supply Update Paper has

¹ <https://www.eastleigh.gov.uk/media/7997/ed75-eastleigh-letter-ons-figures-4820.pdf>

² <https://www.eastleigh.gov.uk/media/8052/ed77-council-response-to-inspectors-letter-of-4th-august-2020-2018-based-household-projections-final.pdf>

³ <https://www.eastleigh.gov.uk/media/9306/ed101-housing-supply-update-july-2020.pdf>

a five-year supply period from 2019-2023, such that the 50 homes per annum expected to be delivered from 2024 onwards are not counted. However, the most recent five-year supply publication⁴ claims at the bottom of page 33 that a material start has been made onsite and that 50 dwellings per annum are expected to be delivered from 2023 (i.e. within the five-year period), then 100 dwellings the year after. This is despite the lack of reserved matters approval or the discharge of pre-commencement conditions. Indeed, application ref. RM/19/86792 for reserved matters approval was validated in November 2019, but the online application file shows an outstanding objection from the Environment Agency because of the site's location within flood zones 2 and 3. There is also a holding objection from the Council's landscape officer.

8. The Council's reliance on the site as a source of housing early in the period post adoption is therefore highly spurious, given the lack of certainty of delivery within the timeframes.
9. Furthermore, MM73 proposes to allocate this site as part of land west of Horton Heath under a new policy ref. HH1. The supporting text sets out at paragraph 6.1.43 how the Council is working with a master developer to '*bring forward a comprehensive development of the whole area*'. This strongly implies that the extant permission for 450 homes will be left unimplemented while the comprehensive scheme is devised – otherwise it begs the question as to how a comprehensive development would be achievable, unless planned in the round and under a new permission.
10. Further confusion is added to the Council's Housing Supply Update Paper where site ref. 0360 on table 4 shows the trajectory for the delivery of 950 homes of the Policy HH1 allocation. This relies on outline permission ref. O/14/75735 (which established access only), granted in December 2017. However, a review of this permission shows that an application for reserved matters approval needed to be submitted within one year and there are no online records of that having occurred. The permission has thus expired and there is no formal allocation of the land, such that the delivery of 40 homes in 2022/23; 170 in 2023/24; (plus continued delivery of between 140-150 homes per annum for four consecutive years thereafter) is impossible⁵. There should thus be no reliance in the trajectory on 210 homes from this source in the five-year supply.
11. Elsewhere, table 5 includes site ref. BU1, which gained outline approval ref. O/17/80899 for the erection of 20 homes. However, a review of the online file shows that the application was withdrawn before a decision was ever issued.
12. The five-year supply is thus at least 230 homes short, just on the basis of assumptions made in respect of sites 0360 and BU1.

⁴ <https://www.eastleigh.gov.uk/media/9808/calculation-of-five-year-housing-land-supply-january-2021.pdf>

⁵ Note that the remaining 100 homes from this new allocation are confusingly shown in table 6 of the trajectory under 'new greenfield allocations', with delivery not forecast to start until 2029/30. This points towards inconsistency, when these 100 homes, which have as much policy support as the 950 homes under site ref. 0360, are shown later in the plan period

13. The second key observation is that the claim at the proposed amendment to Policy S3 that '*ii. West of Horton Heath*' is a strategic site with planning permission is wrong: it has no permission, bar outline consent for 450 units, thus making the assumptions for the delivery of 1,500 homes also incorrect.
14. The solutions to the above identified problems are firstly, to allocate additional land to make up the shortfall of housing land supply in the short term; and secondly, to adjust the figure under part a. of the policy to 4,910 (to remove 1,050 homes assumed to have planning permission that do not).
15. As set out in PHSC's previous Regulation 19 representations and the responses to the inspector's matters, issues and questions, PHSC's land promotions at Hamble airfield and land north of Grange Road in Botley are two examples of deliverable sites that could plug the gap in housing land supply. To that end, the figure of 732 dwellings from smaller greenfield sites set out in Policy S3 will need amending by the addition of 365 homes (representing 275 at Hamble airfield and 90 at Grange Road) to 1,097.
16. Turning next to the Council's commitment to a review of the plan, PHSC notes paragraph 42 of the inspector's post-hearings advice to the Council (ED71)⁶, which draws attention to the need set out in legislation to review a plan within five years of adoption. The proposed amendment to paragraph 4.12 of the plan to commence this review within a year is therefore technically appropriate in theory, but PHSC would respectfully remind the Council that it has not had an adopted plan since 2006 and the production of the current local plan has been fraught with delays, difficulties and elements deemed to be unsound by the inspector. Furthermore, the above analysis in this representation points very strongly towards a number of unjustified assumptions in housing land supply. A review should therefore be immediate, given the circumstances.

⁶ <https://www.eastleigh.gov.uk/media/7309/ed71-eastleigh-post-hearings-final.pdf>

MM27: Strategic Policy S8 (Protection of Settlement Gaps)

17. PHSC is primarily concerned with the identification of gaps at sites it is promoting at Grange Road in Botley and Hamble airfield. Figures 1 and 2 below identify the locations of each.

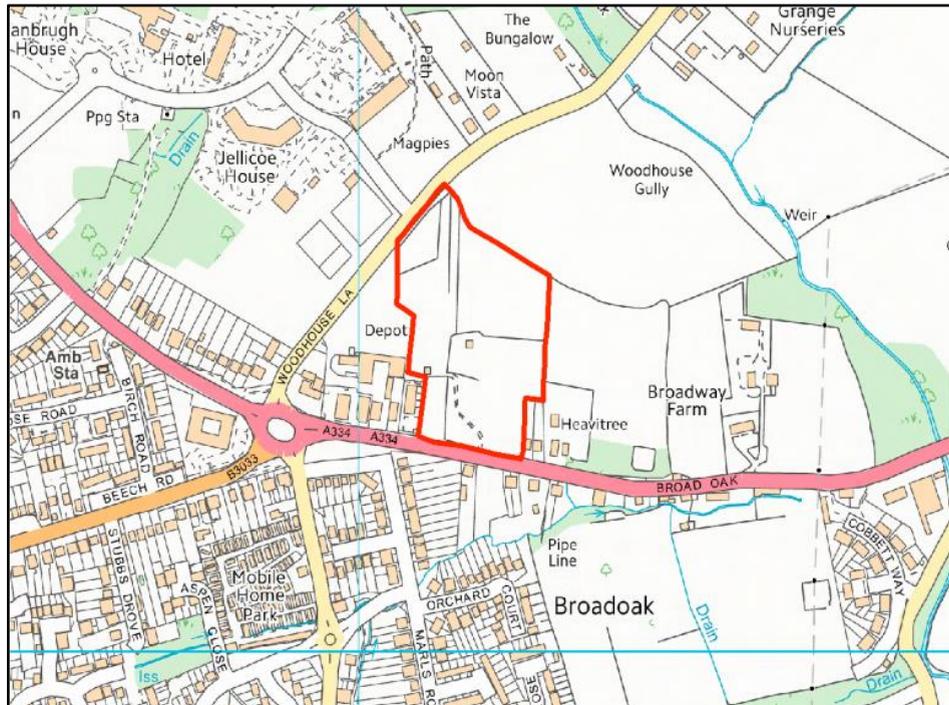
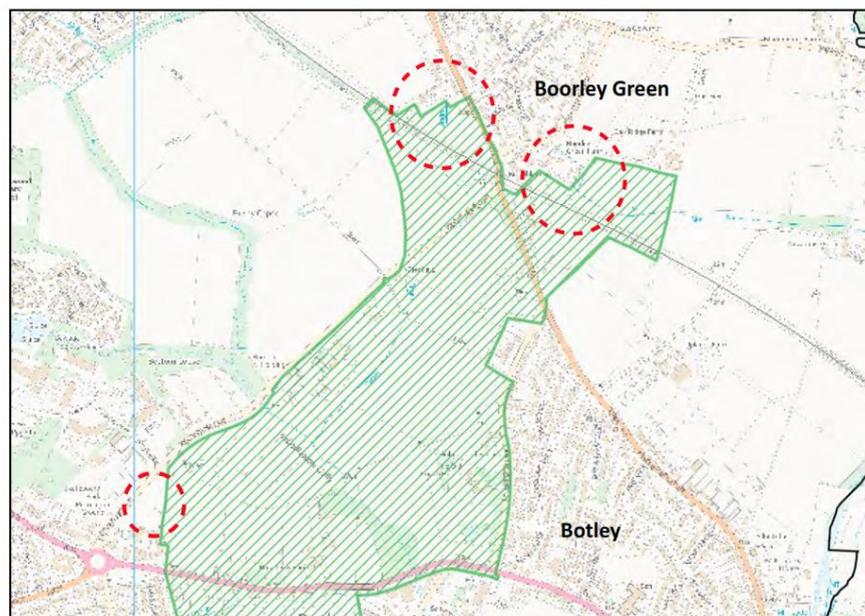


Figure 1: land at Grange Road, Botley (taken from the Council’s SLAA ref. 3-27-C)



Figure 2: land at Hamble airfield (taken from the Council’s SLAA ref. 8-2-C)

18. PHSC has now had the opportunity to review the Eastleigh Borough Settlement Gaps Study Report 2020 (ED84)⁷, which provides the retrofitted evidence to support Policy S6 (Protection of Settlement Gaps) of the plan. PHSC continues to be disappointed that its sites at Grange Road in Botley and land in the Hamble area remain within settlement gaps.
19. The inspector will find appended to this representation two analyses prepared by CSA Environmental, which look closely at the contribution of each site towards the purposes of settlement gaps. In summary, the CSA Environmental work highlights the confusing method of the Gaps Study Report and how it does not address the two key requirements of the gap policy identified by the PUSH guidance and the inspector, namely maintaining visual and physical separation between settlements, and preserving settlement identity.
20. In the case of land at Grange Road, which features in land parcel 16 of the Gaps Study Report, there is little to no evidence to support the report's conclusions and its descriptions are inaccurate. Indeed, the CSA Environmental report concludes at paragraph 3.24 that the study *'lacks a transparent methodology which makes a clear connection between the findings of the desktop study/field work and the assessment of each sub area'*. This goes against the inspector's request at paragraph 32 of the post-hearings note⁸ (ED71) for a *'clear and robust paper'*.
21. As can be seen from the excerpt taken from map book 2 (PM3), map 8, in figure 3 below, a number of amendments to settlement gaps are now proposed by the Council, but land at Grange Road is to remain in the gap.



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 Area to be deleted

Figure 3: excerpt from map book 2, map 8

⁷ <https://www.eastleigh.gov.uk/media/8870/settlement-gap-study-report-october-2020.pdf>

⁸ <https://www.eastleigh.gov.uk/media/7309/ed71-eastleigh-post-hearings-final.pdf>

22. CSA Environmental finds that PHSC's promoted site at Grange Road plays no material role in maintaining the physical or visual separation of Hedge End and Botley. Its inclusion within the gap is therefore inconsistent with the reasons behind the designation. Indeed, paragraph 29 of the inspector's post-hearings note draws attention to the PUSH criteria of '(i) gaps should not include more land than is necessary to prevent the coalescence of settlements and that (ii) land to be included should perform an important role in defining settlement character and separating settlements at risk of coalescence' – in this context, it is clear from the evidence appended to this statement that land at Grange Road does not perform the strategic role of a settlement gap and it should be removed from the designation.
23. Similarly, CSA Environmental finds that the gap to the north of Hamble airfield is not necessary. In fact, paragraph 2.3 of the analysis draws on direct quotes from the Council's own landscape and visual appraisal contained in the 2018 Countryside Gaps Background Paper⁹ (ENV002):

'Land at the northern end of the former airfield and land around Hamble College is not necessary to the function of the gap between Hamble and Bursledon... the areas identified which do not contribute to the function of the gap should be removed from the designation... the former airfield site should be taken out of the gap'.
24. The inclusion of the site within the gap is therefore highly spurious and inconsistent with the Council's own findings.
25. The Gaps Study Report also advocates retaining the poorly defined boundary of the gap at Hamble airfield, which cuts across the site without following any sort of logical land line. The ambiguous line is shown in the excerpt in figure 4 below, which shows the recommended extent of the gap, which in turn has been translated into the policies map. PHSC strongly believes that the railway line to the north would make a much more logical and defensible boundary.

⁹ <https://www.eastleigh.gov.uk/media/3452/final-countryside-gaps-bp.pdf>

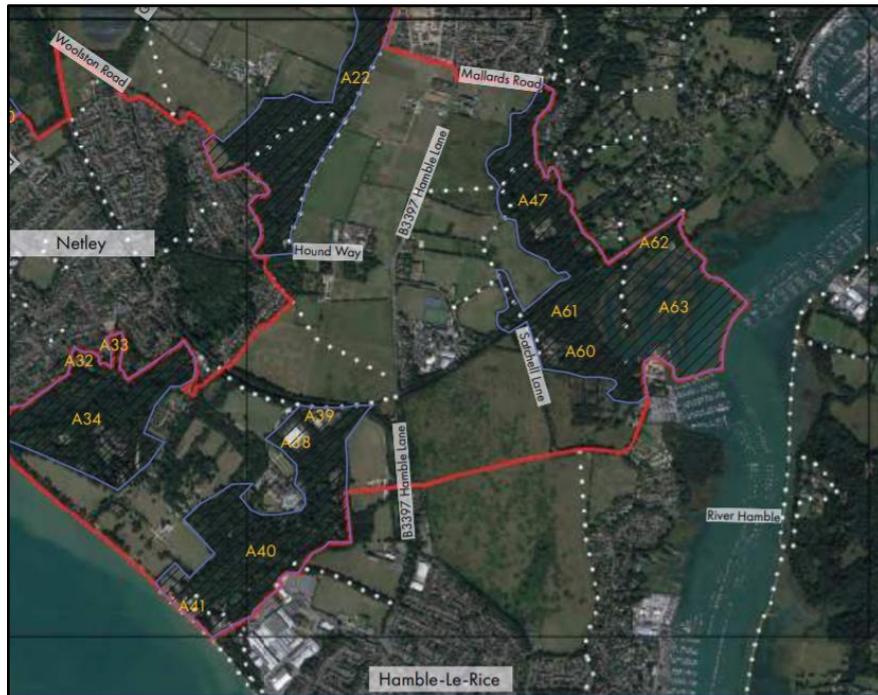
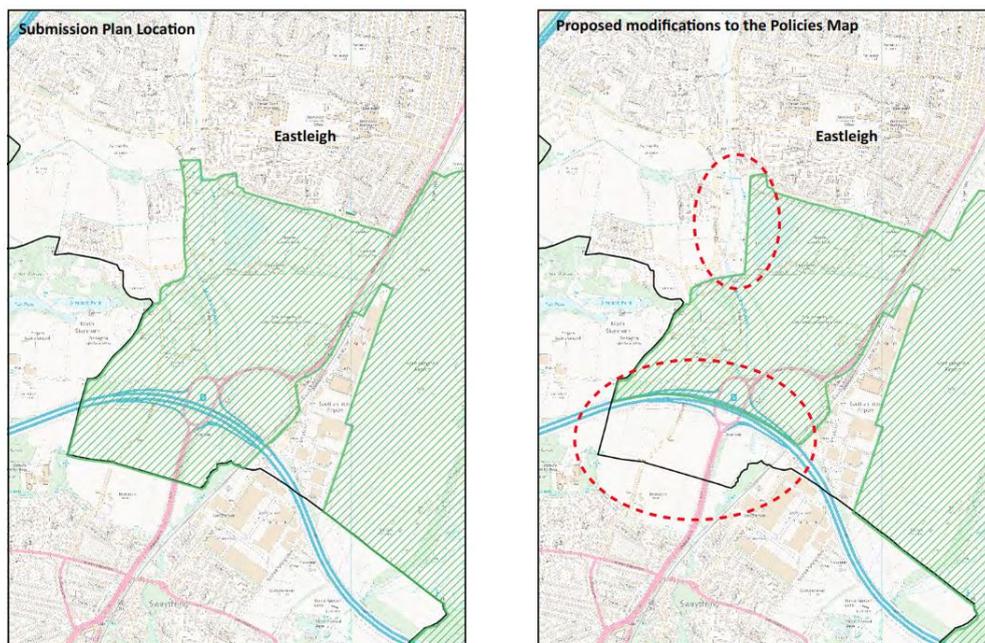


Figure 4: excerpt from map on page 32 of the Settlement Gap Study Report, showing the illogical boundary of the gap passing through Hamble airfield

26. The Council's treatment of this boundary is clearly unsatisfactory, as well as inconsistent. The excerpt of the proposed amendments to map 5 provided in figure 5 below shows that a previously ambiguous gap to the west of the airport has now been adjusted to use the M27 as a defensible boundary.



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Figure 5: excerpt from map book 2, map 5, showing a boundary adjustment to accord with a logical land line

27. Paragraph 3.8 of the CSA Environmental report notes how ambiguous the term 'openness' is in the Gaps Study Report. It is not only at odds with the primary purposes of countryside gaps (as set out in the inspector's post-hearings note), but it is notably akin to the terminology used to describe the characteristics of green belt. The repeated use of 'openness' in the study – 123 times in fact – is therefore worrying and it comes across as the Council attempting to impose green belt by stealth.
28. The Gaps Study Report has since been used to feed into the Council's response to Matter 3: Strategic Policies, Spatial Strategy and Distribution of Development (ED89)¹⁰. Tables C, D and F of the paper supposedly reconsider the suitability of land at Grange Road for development, but continue to spuriously rule out the site on settlement gap grounds.
29. In summary, PHSC objects to the Gaps Study Report's conclusions and the amendments to the policies map. The updated evidence base continues to attempt to justify foregone conclusions as to the appropriateness of countryside gaps at Grange Road and Hamble airfield. However, the method behind the Council's study is not transparent and the study does not accord with the principal aims of countryside gaps, set out in the PfSH guidance and by the inspector. The Gaps Study Report is thus not objective and not a sound basis on which to draw conclusions. The plan, as proposed to be amended under MM27, therefore continues to be unsound.
30. In order to make the plan sound, the evidence base and policies map require updating to remove land at Grange Road and Hamble airfield from the settlement gaps designation.

MM34: key diagram

31. Following on from PHSC's objections to MM27, PHSC also wishes to object to the proposed amendments to the key diagram. As the settlement gaps identified under MM27 are inappropriate, it therefore follows that the boundaries shown on the policies map are also inappropriate.
32. PHSC believes that to make the plan sound, land at Grange Road in Botley and Hamble airfield should be removed from the settlement gap designation and the key diagram amended accordingly.

MM58: Policy DM31 (Dwellings with Higher Access Standards)

33. PHSC notes that the Council is seeking to modify Policy DM31, but PHSC continues to argue that the policy itself is inherently not sound because it has scant regard for first principles. This is for the reasons explained in PHSC's response to matter 7, which explained in detail the various considerations required by ref. ID 56-007-20150327 of PPG to support such a policy, none of which have been undertaken by the Council.

¹⁰ <https://www.eastleigh.gov.uk/media/9294/ed89-actions-matter-3-strategy.pdf>

34. The Council's defence is set out in its response to Matter 7: General Housing Matters (ED93)¹¹, which is essentially that other councils have a policy. But PHSC believes this defence to be insufficient, as complying with the PPG's requirements should be the starting point.
35. The policy, as proposed to be modified, therefore continues to be in conflict with national guidance and is not sound. It should be removed from the plan.

MM122: glossary

36. As set out above in PHSC's response to MM27, the inspector's post-hearings note to the Council (ED71)¹² draws attention at paragraph 29 to the PUSH criteria of '*(i) gaps should not include more land than is necessary to prevent the coalescence of settlements and that (ii) land to be included should perform an important role in defining settlement character and separating settlements at risk of coalescence*'.
37. The Council's proposed glossary includes a definition of a settlement gap, which uses terminology including 'open' and 'merging'. These terms are highly reminiscent of green belt policy and therefore infer that the Council is attempting to introduce specific criteria relating to a separate designation into the borough. PHSC instead believes that the inspector's wording in paragraph 29 of her post-hearings note should form the basis for the definition.

¹¹ <https://www.eastleigh.gov.uk/media/9298/ed93-actions-matter-7-housing.pdf>

¹² <https://www.eastleigh.gov.uk/media/7309/ed71-eastleigh-post-hearings-final.pdf>

Appendix A: CSA Environmental Grange Road gap assessment

Landscape and Visual Appraisal of the effects of proposed development at Grange Road, Hedge End, on the separation of Hedge End and Botley

Grange Road, Hedge End, May 2021

This review has been prepared by CSA Environmental on behalf of Persimmon Homes, in relation to land at Grange Road, Hedge End (hereafter the 'Site'). It provides a review of the landscape and visual character of the land between Hedge End and Botley, and considers the effect of developing the Site on the separation of these settlements. The Site is located within the Hedge End to Botley Local Gap and this review also considers the findings of the Council's Settlement Gap Study (2020).

1.0 Introduction

- 1.1 The Site is located on the eastern edge of the built up area of Hedge End. It is located within the Hedge End – Botley 'Local Gap' as identified in Policy 3.CO of the adopted Eastleigh Borough Local Plan 2001 – 2011. The Site is being promoted for residential development by Persimmon Homes.
- 1.2 The draft Local Plan (2016 – 2036), which is currently at examination, retains a Settlement Gap between Hedge End and Botley. The Council is in the process of preparing its main modifications to the draft Local Plan following the Inspectors comments. Draft Policy S6, Protection of Settlement Gaps of the proposed main modifications, relates to the retention of gaps between settlements in the District. The draft policy wording states that development in a Settlement gap will be permitted provided that:
- a. *'It would not diminish the physical extent and / or visual separation of settlements; and*
 - b. *It would not have an urbanising effect detrimental to:*
 - I. *The character of the countryside; or*
 - II. *The separate identity of the adjoining settlements.'*
- 1.3 The draft Local Plan Proposals Map (Extract at Figure 1), shows the extent of the Hedge End and Botley Settlement Gap, with the Site located within the western part of the gap immediately adjacent to the urban edge boundary of Hedge End. The gap also includes the houses and nursery area to the south of the Site, and the recreational area to the north west, beyond Woodhouse Lane.
- 1.4 The draft Local Plan proposes a number of alterations to the existing boundaries of the Hedge End and Botley local gap. This includes removal from the gap of the majority of the proposed allocations at Land west of Woodhouse Lane, Hedge End (Draft Policy HE1), and Land west of Uplands Farm, Botley (Draft Policy BO2). The

Land west of Woodhouse Lane has outline consent for 605 dwellings, a local centre and a secondary school which was granted in July, 2018 (O/18/38634).

- 1.5 The Eastleigh Local Plan Examination Inspector, in their April 2020 letter to the Council (examination library document ED71), raised concerns in relation to the methodology and background evidence underpinning the draft designation of 'countryside gaps' (now referred to as Settlement Gaps). As noted by the Inspector, *'the extent to which the designations as proposed extend throughout the borough and take full account of [not including more land than necessary] and [ensuring that the land which is included performs an important role in defining the settlement character and separating settlements] is neither logical nor supported by a robust evidence base.'* Paragraph 31 of the Inspector's letter goes on to state:

'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.'

- 1.6 The Inspector recommended that the Council re-visit each of the countryside gap designations, and prepare clear and robust evidence to support their designation.
- 1.7 The Inspector also raised concerns about the wording of draft policy S8: Protection of Countryside Gaps which required proposals to be assessed in terms of their effect on openness as well as the character of the countryside. The Inspector notes that this approach is at odds with the primary purpose of designating settlement gaps, which is to prevent settlement coalescence and define settlement character.
- 1.8 The Council published the Eastleigh Borough Settlement Gap Study in October 2020, in response to the Inspector's post hearing advice. We consider the Council's gap evidence base further below in respect of the Hedge End to Botley settlement gap. We have also undertaken our own assessment of the character of the existing gap, as set out in Section 4, and consider the degree to which the Site contributes to the separation of these settlements.
- 1.9 Our assessment, shows that the land at Grange Road can be removed from the Settlement Gap designation, without resulting in visual or perceptual coalescence of Hedge End and Botley.

2.0 Site Location and Description

2.1 The Site is located on the eastern edge of Hedge End, to the east of the city of Southampton. Grange Road / Broad Oak forms the southern boundary of the Site, with Woodhouse Lane running along the north western boundary. Development borders the greater part of the western boundary of the Site. This development is largely commercial, including a waste transfer station; a petrol filling station, car sales garage, office buildings and, directly adjoining the south-western corner of the Site, a three-storey building of residential apartments. Opposite the Site to the south are residential properties on Broad Oak. Three existing properties border the Site on Broad Oak to the east.

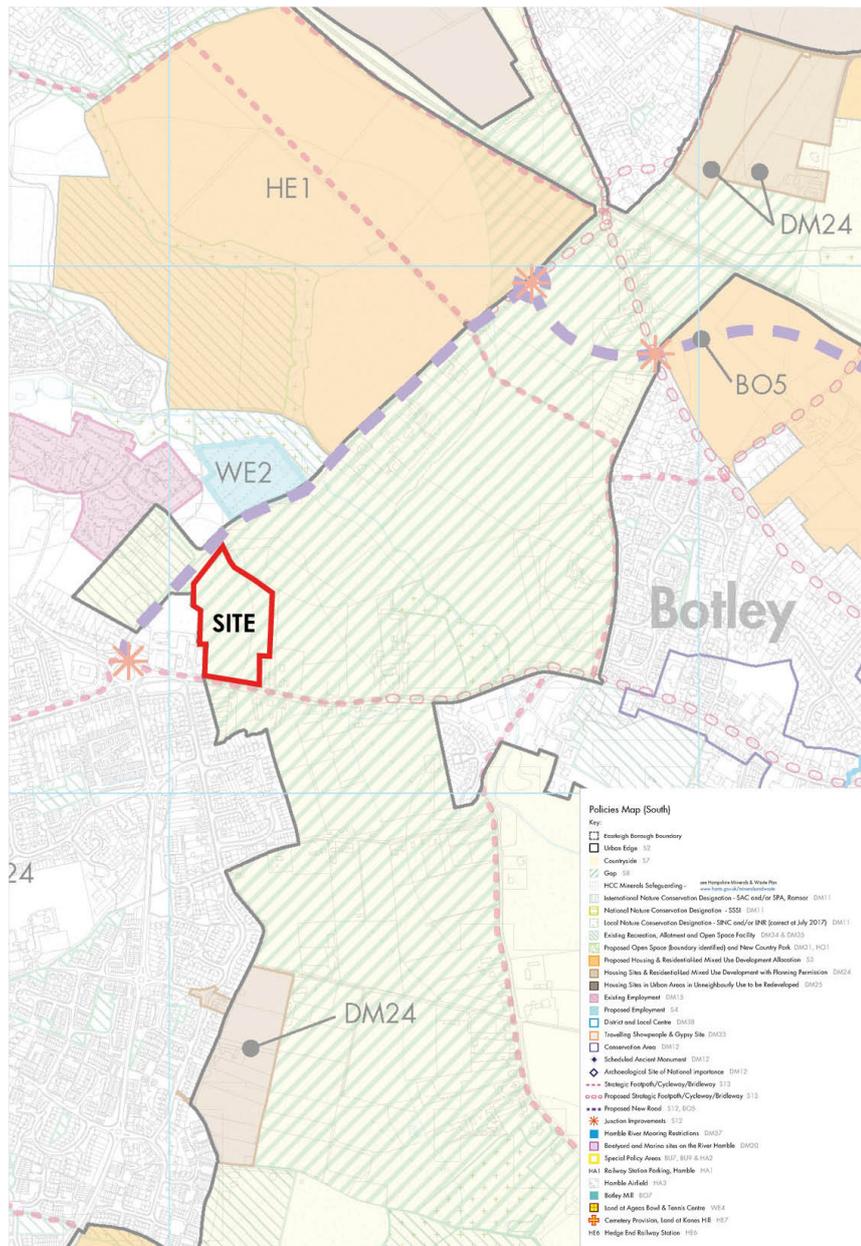


Figure 1 – Extract from the draft Local Plan (2016 – 2036) showing Site Location

3.0 Eastleigh Borough Settlement Gap Study (October 2020)

3.1 The Settlement Gap Study has been prepared by Deacon Design Ltd in collaboration with Eastleigh Borough Council. It provides an updated evidence base for the draft Local Plan and the proposed modifications to Settlement Gaps. The objective of this Study is to provide robust evidence in order to evaluate the appropriateness of existing Settlement Gaps, and where applicable propose modifications to these gaps.

Methodology

3.2 The Study states that the methodology is derived from the core criteria for the designation of gaps recommended in the Policy Framework for Gaps produced in 2008 by the Partnership for Urban South Hampshire ('PUSH'). The core criteria are as follows:

- *'Assessment of the open nature/sense of separation between settlements at risk of coalescence.*
- *Whether 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.*
- *In defining the extent of a Gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.' (Our underlining)*

3.3 The methodology also notes that the PUSH Spatial Position Statement (2016) identifies the important role of gaps in maintaining the countryside setting for local communities as part of protecting settlement identity.

3.4 The methodology identifies the Study Areas which form the basis of the gap assessment. The Site is located within Area I – Botley, Hedge End and Boorley Green Settlement Gap. These Study Areas are assessed through a combination of desktop study and field work. The methodology states that the field work consists of four parts:

1. Settlement and settlement edge characterisation;
2. Gap characterisation, including the experiences of different users moving between settlements and the frequency of use;
3. Recording viewpoints illustrating landscape and the function of the gap, including inter-visibility between settlements;
4. Analysis of gaps contribution to settlement identity, openness, separation functions, landscape features and opportunities for landscape enhancements and green infrastructure improvements.

3.5 In addition, the methodology notes that assessors recorded the experience of leaving / arriving at different settlements.

3.6 Following fieldwork the Study Areas were broken down into sub-areas which the methodology states perform a similar role in respect of settlement separation. The

methodology does not provide any further clarity on how the sub-area boundaries were defined. These Sub-areas were then evaluated against five core criteria, based on the PUSH guidance, as follows:

- *'The area helps preserve the open nature of the Gap.*
- *The area helps maintain the sense of separation between settlements.*
- *The area plays an important role in defining the settlement character.*
- *The area plays an important role in separation of settlements at risk of coalescence.*
- *The land is necessary in preventing the coalescence of settlements.'*

3.7 These criteria provide a summary of the functions which land included within a settlement gap should provide. However, they do not provide a framework for undertaking a meaningful assessment of whether land within a sub-area meets a particular function. It is not clear from the methodology how each of these criteria have been assessed, and what information has been used to inform decisions on whether or not a sub-area meets one or more of the criteria. For instance, what factors have been used to assess the role of a parcel in maintaining separation, or its contribution to settlement character. Further clarity on how factors such as inter-visibility between settlements, settlement edge treatments or perceptual factors such as the sense of entering or leaving a settlement have informed these criteria is clearly required.

3.8 It is also unclear what role 'openness' plays in defining settlement separation. The Inspector's post hearing advice (ED71) raised concerns about reference to 'openness' in the wording of Policy S8, which the Inspector stated was at odds with the primary purpose of designating settlement gaps, which is to prevent settlement coalescence and define settlement character. There is no clear definition of what constitutes openness in the Study's methodology. It is not clear if this is the absence of built development, or does it also include tree cover, which conversely can restrict visibility and assist in maintaining settlement separation.

3.9 The above criteria are also repetitive. The second, fourth and fifth criteria are all related to maintaining separation between settlements, and are effectively indistinguishable from one another. This skews any assessment, as a sub-area which meets one of these criteria will inevitably meet the other two.

3.10 The methodology also makes no mention of the third PUSH criteria, namely to include no more land within a gap than is necessary to prevent visual and physical coalescence. This was also a fundamental requirement of the Inspector's post hearing advice. There is no reference within the methodology to this criteria and to what extent this has been fully considered within the Study.

3.11 The methodology also includes a number of complementary criteria:

- The risk of gap fragmentation;

- Role of gaps in maintaining countryside setting for local communities where it is an integral part of protecting settlement identity; and
- Consider removing large woodland areas from the edge of gaps.

3.12 The methodology applies equal weight to both the core and complementary criteria. However, it is unclear how these additional criteria add much value to the assessment of gap function, and these additional factors could easily be addressed within a comprehensive boundary review or settlement separation assessment. In addition, the assessment against the core criteria appears to be a simple tick box exercise. This approach is very black and white, as it should be assumed that there will be some variation in the performance of sub-areas against each criteria. This is a fairly blunt approach to determining the performance of each sub-area, without further analysis and explanatory text.

3.13 The methodology states that green infrastructure opportunities have been considered for the sub-areas. It also states that opportunities to strengthen existing gap boundaries, or provide stronger alternative boundaries have been considered. A comprehensive review of the existing gap boundaries and consideration of alternative boundaries is a fundamental requirement of a gap study. The degree to which this has taken place is discussed further in the section below. In terms of wider green infrastructure provision, this is not a function of gap policy per se, which is effectively a spatial planning tool. It is also not clear how, where green infrastructure opportunities have been identified, through what mechanism these would be delivered.

3.14 Overall, the methodology is somewhat confusing. It is difficult to understand how the factors which have been identified through the desktop and field work studies form a basis for the evaluation against the identified core criteria. In addition, these criteria are repetitive and should be refined to address the two key requirements of the gap policy identified by the PUSH guidance and highlighted by the Inspector, namely maintaining visual and physical separation between settlements, and preserving settlement identity. In addition, the methodology should be explicit about how it has identified parcels of land which do not fulfil this function, and therefore should not meet the requirements of a settlement gap policy.

Gap Analysis – Area I Botley, Hedge End and Boorley Green

3.15 This first part of this section contains a high level analysis of the main characteristics of Area I, under a series of headings. The following points are of relevance to the Site at Grange Road, and are set out below under the appropriate heading and with a short commentary:

Hedge End Settlement Edge Character

'...the A334 forms a clear break in character to the northern and southern settlement edge. From the Maypole Roundabout running north along Woodhouse lane the settlement is defined by a mixture of commercial activities and residential dwellings. Nevertheless, the mature field hedgerow / highway vegetation that runs along much of its route provides a strong edge

to the settlement. The exception being the garden centre businesses to the northern part of Woodhouse Lane which has an open frontage / car parking with limited landscape treatment.'

To the south of the A334 Botley Road, suburban residential development forms an abrupt edge to the settlement, with remnant field boundary trees offering some relief to the adjoining paddocks and fields / settlement edge.'

- 3.16 Whilst this description is relevant for much of the length of Woodhouse Lane, and in respect of the settlement edge to the south of the A334. The Site lies a short distance east of the Maypole Roundabout and the boundary with Woodhouse Lane is formed by a pocket of commercial / office development at this point. Furthermore, immediately south of the Site is existing residential development which forms the existing edge to the Hedge End urban area.

Sense of Arrival / Leaving

- 3.17 The A334 / Botley Road 'is characterised by ribbon development and some unsympathetic commercial activities detrimental to local character.'

However, separation whilst brief, does encompass several landscape features which contribute to a sense of departure and arrival. This includes:

- 1. Winding road with large extents of mature vegetation;*
- 2. Sunken levels associated with watercourses;*
- 3. Grassed embankments preventing screening views of properties;*
- 4. Historic residential ribbon dwellings with glimpsed views of paddocks and field boundaries behind.'*

- 3.18 The A334 is characterised by existing ribbon development and commercial properties interspersed with paddocks and fields. The sense of transitioning between settlements is evident between Homelands to the east and the properties at the eastern edge of Hedge End. The Site is closely related to housing at the edge of Hedge End and is visible in conjunction with the built development at Maypole Roundabout. It clearly does not form part of the transitional zone described above.

Openness

'In keeping with the landscape character, the study area is split into two main landscape areas with open grassland/ farmland to the north; and enclosed small scale paddocks to the south.

Dense tree belts and woodland, combined with varying field boundaries, also influence its sense of openness and largely prevents intervisibility between the settlements.'

- 3.19 This confirms that there is little intervisibility between the settlement edges at Hedge End and Botley. However, there is no further visual analysis of the relationship between these settlements and whether all the land within the current gap is required to maintain visual and physical separation of these settlements. In addition, the above description does not acknowledge the presence of built

development within and at the edge of the gap, or what role this perceived 'openness' plays in maintaining separation.

3.20 Figure 3a – Field Findings Plan (see extract below) illustrates the findings of the field work in respect of the wider gap. This plan identifies that the sense of arriving in Hedge End on the A334 occurs to the immediate south west of the Site. It also identifies a key view from the A334 across the Site, however there is no description of this view. Observation 9 notes that there is an opportunity to address poor field boundary treatments to the A334 at the southern edge of the Site, to reinforce the landscape setting and sense of leaving Hedge End. Observation 7 notes the opportunity to reinforce field boundaries at the northern edge of the Site, to maintain connectivity / visual separation and address the existing hard urban edge.



Figure 2 – Extract from Settlement Gap Study, Figure 3a – Field Findings Plan (North)

3.21 The second part of the gap analysis briefly considers the identified sub-areas within Area I. The Site is located within sub-area 16, which is one of the largest land parcels and comprises the fields either side of the A334, Botley Road. The Study describes sub-area 15 as follows:

'Combination of ribbon development, scattering of mature trees and paddocks to the rear provide a short lived but clear change of character from the built form edges to Hedge End and the wooded arrival to Botley. Whilst the horse paddocks are poor in landscape character, the remnant field boundaries and open nature contribute to the separation between the two settlements particularly when experienced from the A334 and bridleway No. 17.'

3.22 The analysis and evaluation section considers that sub-area 16 meets all of the core criteria identified in the assessment methodology, although there is little / no evidence produced to support these judgements. In respect of sub-area 16 it concludes as follows:

'This area lies at the narrowest section between Botley and Hedge End and performs all Gap functions. The fields on both sides of Botley Road (A334) contribute to the perception of Gap's openness and the separation between the two settlements. Thanks to the open nature of those fields, and their predominantly undeveloped character, the sense of leaving / arriving to either of the settlements is maintained despite the short distance (approximately 300m). The fields also contribute to the separation of the settlements for viewers on the bridleway No. 17 to the south.'

3.23 This description is inaccurate and suggests that the A334 has a largely open, undeveloped character, however in reality there is almost continuous development along one or both sides of the route between the two settlements. The transition is perceived more as a change in the character of development, rather than as a clear and physical break.

3.24 This Study provides a very high level assessment of the functions of the gap between Hedge End, Botley and Borley Heath. There is no evidence that any detailed visual analysis of the separation between these settlements has been undertaken, nor does it contain a robust assessment of the gaps existing boundaries, or consideration of robust alternative boundaries. In addition, it is unclear how judgements regarding the sub-areas performance against the core criteria have been reached, and there is no clear methodology to underpin these findings. There is an absence within the report of evidence of more detailed assessment work, and the Study lacks a transparent methodology which makes a clear connection between the findings of the Desktop Study / Field Work and the assessment of each sub-area. Accordingly, the Study as it currently stands does not provide a robust assessment to support the retention of the Settlement Gap at its proposed extent.

3.25 In the following section we consider whether inclusion of the Site at Grange Road in the Settlement Gap is necessary in order to maintain separation between Hedge End and Botley.

4.0 Perception of the gap between settlements

- 4.1 The previous section has considered the Council's evidence base which reviews the extent of the gaps within the draft Local Plan. It is apparent from this review that the Council's Gap Study lacks substantive evidence / analysis to support its conclusions.
- 4.2 This section of the report considers the existing character of the land between the settlements of Hedge End and Botley. It then goes on to consider whether the Site contributes to the visual and physical separation of these settlements. The Site, its surrounding context and the extent of the proposed Settlement Gap are shown on the Aerial Photograph, Figure 3 below.

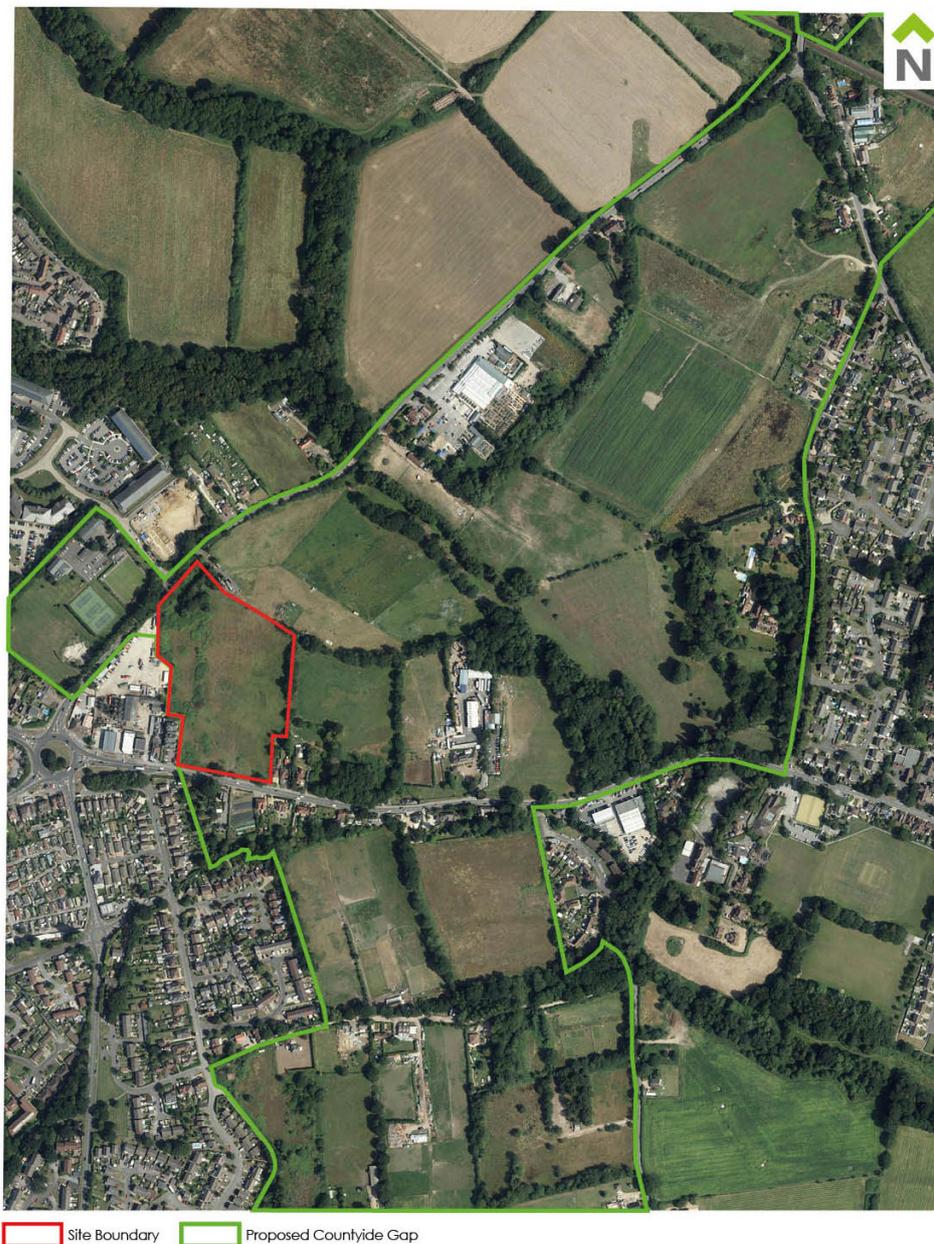


Figure 3 – Aerial Photograph showing Site context and wider proposed Settlement Gap

- 4.3 To inform the assessment of the Site and surrounding area, CSA revisited the Site in November 2020.
- 4.4 In looking at the degree to which the Site contributes to visual and physical separation of settlements, the following criteria have been used:
- The existing character and setting of settlements;
 - Inter-visibility;
 - Travelling between neighbouring settlements and the perception of entering one settlement and leaving another; and
 - Impact on the physical gap between settlements.

Character of the countryside between Hedge End and Botley

- 4.5 Broad Oak (A334) is the principle route linking the settlements of Hedge End and Botley. Where it crosses the gap, it is characterised by a continuous band of low density residential development, which follows the southern edge of the road. The northern edge of the road is marked by intermittent housing, interspersed by blocks of woodland and pockets of farmland. The distribution warehouses and buildings at Broadway Farm are located centrally within the gap at the northern edge of the highway.
- 4.6 To the north of Broad Oak, between Woodhouse Lane and Holmesland Lane, is medium and large scale farmland, comprising arable fields and a number of horse paddocks adjacent to Hedge End. The landform generally falls towards a heavily wooded watercourse, which crosses centrally through this area. To the north east of the watercourse the farmland is more open and there is inter-visibility between Woodhouse Lane and Holmesland Lane at the edge of Botley. Hilliers Garden Centre is located on Woodhouse Lane to the north of the watercourse. To the north west of Woodhouse Lane, the adjacent farmland has outline consent for a mixed use development of 605 new homes.
- 4.7 To the south of Broad Oak, the field pattern has a finer grain and is sub-divided by mature treed field boundaries and pockets of woodland, which limit views across this area. This area is crossed by The Bridleway which links between Marls Road and Brook Lane. There is intermittent development alongside the southern edge of the right of way. The predominant land use is horsiculture, although there are a number of small arable fields.

Existing Character and setting of Settlements

- 4.8 The eastern edge of Hedge End is typically characterised by post war development, with rear garden boundaries often marking the interface with the adjoining farmland within the gap. To the west of the Site is a petrol filling station, an area of commercial development, and a prominent three storey flatted development which overlooks the western Site boundary. These existing land uses currently provide a rather abrupt, unsatisfactory edge to the proposed gap, and gateway to Hedge End along the route of Broad Oak.

- 4.9 In contrast, the western edge of Botley, has a much softer edge, with significant areas of woodland / tree cover within the large properties to the west of Holmesland Lane, and along the route of Brook Lane to the south. To the north of Botley, the boundary is less well defined, with existing garden boundaries marking the edge of the settlement.
- 4.10 The Site is closely associated with built development at the edge of Hedge End, with development to the immediate south, west and indented into the south east corner of the Site. It plays a limited role in providing a setting for the adjacent built edge, which as noted forms a rather unsatisfactory edge to the settlement at this point. If the Site were to come forward for development there is an opportunity to provide a considered landscaped frontage to the approach on Broad Oak, whilst also reinforcing the existing boundary vegetation to provide a strong landscaped edge to this part of Hedge End.

Intervisibility

- 4.11 There is no inter-visibility between the Site and the eastern edge of Botley owing to local topography and intervening development and vegetation which screens views. The woodland belt, which follows the watercourse and shallow valley to the north east of the Site, screens views towards the Site from the wider land to the north east, and from Holmesland Lane at the northern edge of Botley. There are glimpsed views of the top of the radio transmitter on the northern edge of the Site from Bridleway 6 (Photograph 1), which links between Woodhouse Lane and Holmesland Lane, however the interior of the Site is not visible in these views. Similarly, the Site is not discernible in views from The Bridleway to the south (Bridleway 17), due to existing housing alongside Broad Oak.
- 4.12 Development of the Site would be similarly well contained in views from the edge of Botley. In addition, it would not intrude on in-combination views from the local footpath network, where both settlement edges are visible in the same view. Accordingly, the Site plays no role in providing visual separation between Hedge End and Botley.



Photograph 1 – View south from Bridleyway 6

Travelling between neighbouring settlements by road and footpaths and the perception of leaving one settlement and entering another

Approaching the Site by Road

Grange Road / Broad Oak

- 4.13 The transition between Hedge End and Botley is characterised by almost continuous development to the south, and intermittent development to the north. Despite this, there is a clear sense of departing one settlement area and arriving at the next.
- 4.14 When traveling west from Botley, the sense of departing the main urban area is most evident at the junction with Holmesland Lane. At this point one clearly exits the main urban area and passes through an area of woodland, which provides a break in built development before arriving at the car dealership to the east of Brook Lane. This sense of departing Botley is reinforced by the dense woodland belt at Holmesland.
- 4.15 Beyond this point, the open fields to the north of the carriageway provide a clear sense of transitioning between the settlements. A single line of low density housing follows the southern edge of the carriageway, however glimpsed views to the open land south of these buildings, reinforces the sense of moving between two built up areas. In addition, along this section there is no inter-visibility between either settlement edge.

- 4.16 The first views towards the western edge of Hedge End become available in the vicinity of Broadoak Cottages (Photograph 2), as the highway turns slightly north west. At this point there is a sense of entering the urban environs of Hedge End. Residential development at Grange and Glendover Cottages, Montague House, Port Marleigh and Heavitree, all located east of the Site, is present to both sides of the carriageway. The petrol station, the three-storey apartment building, the waste transfer station and associated development to the east of Maypole Roundabout is also visible beyond this housing. It is apparent therefore that when traveling west from Botley, at the point at which the Site first comes into view, the urban edge of Hedge End is already clearly visible. The Site, despite being undeveloped, clearly relates to the surrounding landuses at the edge of Hedge End. Furthermore, it does not form part of the transitional zone described above, which is experienced along the section of Broad Oak further to the east.
- 4.17 For the reasons set out above, the Site therefore makes virtually no contribution to the sense of separation along the route of Broad Oak.



Photograph 2 – View west from Broad Oak in the vicinity of Broadoak Cottage, on the approach to Hedge End

Woodhouse Lane

- 4.18 The Draft Local Plan identifies that Woodhouse Lane will be upgraded as part of the proposed Botley Bypass highway scheme (Draft Policy BO5). In addition, the proposed allocation, Land west of Woodhouse Lane, which has planning consent for a mixed use residential development, will extend built development along the northern edge of Woodhouse Lane. This will significantly reduce the existing gap

between Hedge End and the northern part of Botley and the neighbouring settlement of Boorley Green, and will impact on the transition between these settlements. Given the proposed changes, the Site which is located to the south of the proposed allocation west of Woodhouse Lane, cannot be considered to make any meaningful contribution to the sense of separation between these settlements when traveling along Woodhouse Lane.

Footpaths

- 4.19 There are two public rights of way which cross the gap to the north and south of the Site. However, as set out above, there is little inter-visibility between these bridleways and the Site, owing to intervening topography and woodland, and built development on Broad Oak. The Site therefore makes no contribution to the sense of separation experienced when using these routes.

Impact on the physical gap between settlements

- 4.20 The extent of the proposed Settlement Gap between Hedge End and Botley is shown on Figure 1. The Site and the wider gap are shown on the aerial photograph (Figure 3), which also illustrates the relationship between the Site and development at the edge of Hedge End. The gap between Hedge End and Botley is approximately 310m wide a short distance south of Broad Oak, but widens to the north between Woodhouse Lane and Holmesland Lane.
- 4.21 The Site is bordered by existing development to the west and northwest and by existing housing to the south. To the east, are three properties on Broad Oak, Montague House, Port Marleigh and Heavitree. The Site does not extend further east into the gap, than the existing settlement edge to the south of Broad Oak, at Orchard Court and Blossom Court. Furthermore, if the Site were removed from the gap, there would be no reduction in the existing gap to the south of Broad Oak. Whilst there would be some reduction in the gap to the north of Broad Oak, a separation distance of approximately 630m would remain between the eastern Site boundary and Holmesland Lane. A robust physical gap would therefore remain, and this distance greatly exceeds other separation distance found elsewhere within the proposed gap. This includes the revised gap boundary between the proposed allocations at HE1 and BO2 and the neighbouring settlement of Boorley Green, which varies in width between 180m and 230m.

Conclusion

- 4.22 It is apparent from our own analysis that in our view the Council need to undertake further gap analysis to fully and robustly justify the extent and function of the existing gap between Hedge End and Botley.
- 4.23 From our analysis of the Site and the wider gap, it is evident that it plays no material role in maintaining the physical or visual separation of Hedge End and Botley. The Settlement Gap Policy is a restrictive policy which seeks to prevent development. It is therefore critical that no more land is included within the proposed gaps than is necessary to maintain settlement separation. For the reasons set out in this report

we would strongly support the removal of the land at Grange Road, Hedge End from the proposed Settlement Gap designation.

Appendix B: CSA Environmental Hamble gap assessment

Landscape and Visual Assessment of the effects of proposed development at Hamble Airfield, on the separation of Hamble, Netley and Bursledon

Hamble Airfield, May 2021

This review has been prepared by CSA Environmental on behalf Persimmon Homes, in relation to land at Hamble Airfield (hereafter the 'Site'). It provides an initial review of the landscape and visual character of the land between Bursledon, Netley and Hamble, and considers the effect of the proposed development at Hamble Airfield on the separation of these settlements. The Site is located within the Bursledon, Netley and Hamble-Le-Rice Local Gap and this review also considers the findings of the Council's gap evidence base and other relevant background information.

1.0 Introduction

- 1.1 The land within the northern part of Hamble Airfield, as well as beyond to the north, north east and north west, is currently designated as a 'Local Gap' in the Eastleigh Borough Local Plan (2001-2011), to ensure separation between Bursledon, Netley and Hamble-le-Rice ('Hamble').
- 1.2 Within the Local Plan (2016-2036) which was submitted for examination to the Inspector, the extent of this Gap in the vicinity of the Site has not changed from the 2001-2011 Local Plan.
- 1.3 The Eastleigh Local Plan Examination Inspector, in their April 2020 letter to the Council (examination library document ED71), raised concerns in relation to the methodology and background evidence underpinning the draft designation of 'countryside gaps'. The Inspector recommended that the Council re-visit each of the countryside gap designations, and prepare clear and robust evidence to support their designation.
- 1.4 The Council published the Eastleigh Borough Settlement Gap Study in October 2020, in response to the Inspector's post hearing advice.
- 1.5 We consider the Council's evidence base further below, as well as other relevant background information. We have also undertaken our own assessment of the visual and perceptual separation between the settlements, as set out in Section 5, and considered the effect of the proposed development at Hamble Airfield on the separation of the settlements.
- 1.6 Our assessment, shows that the land at Hamble Airfield can be removed from the Local Gap designation, without resulting in visual or perceptual coalescence of Bursledon, Netley or Hamble.

2.0 Eastleigh's Countryside gaps background paper (June 2018)

2.1 The background paper formed part of the evidence base, and considered, amongst others, the appropriate boundaries of the proposed Gaps. In response to the Inspector's post hearing advice, this evidence has now been superseded by the Council's Settlement Gap Study. However, Appendix 1 of the background paper contains a landscape and visual appraisal of the existing gaps in the District. The findings of this appraisal in respect of Hamble Airfield are of relevance to this document.

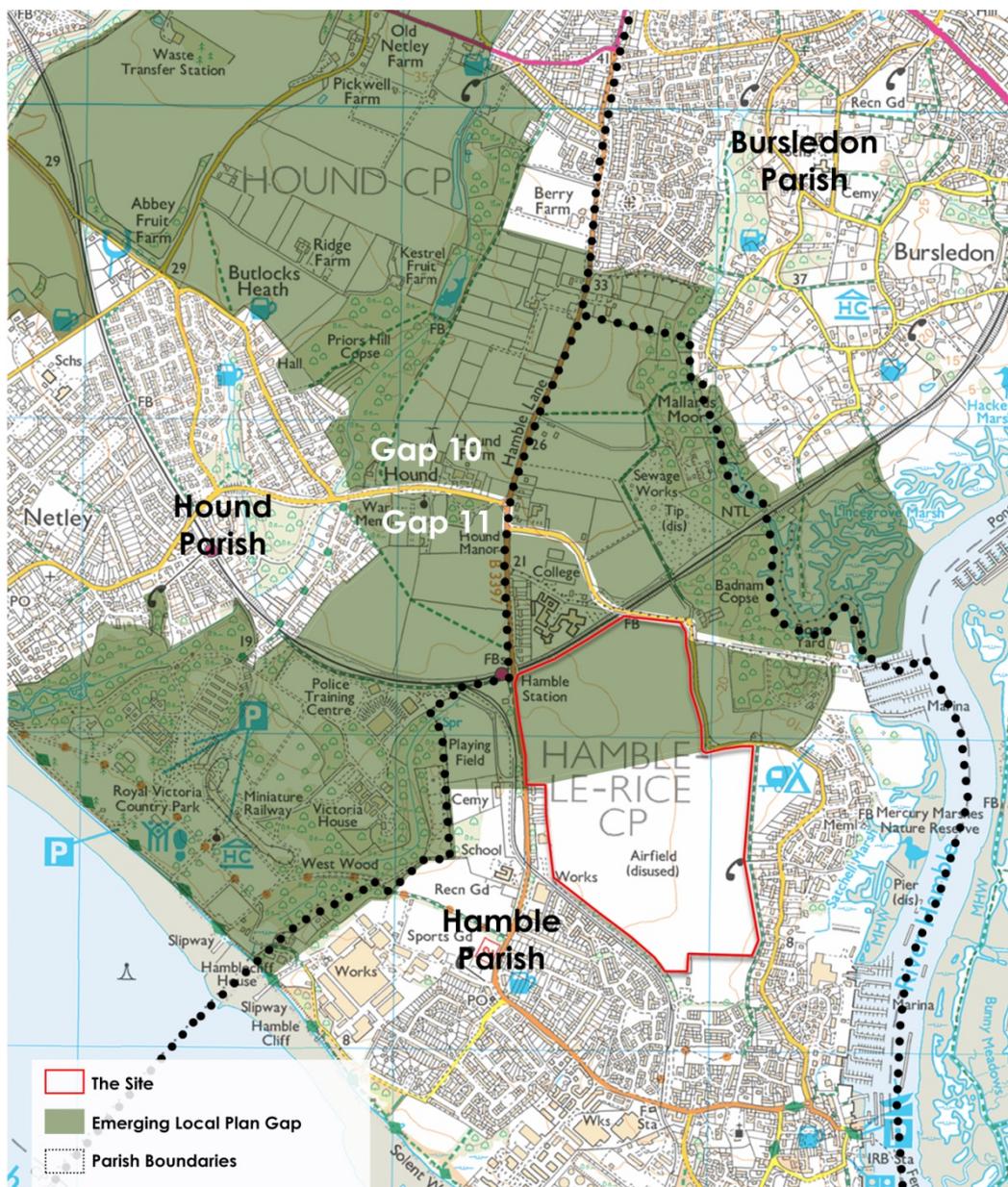


Figure 1 – Site location in relation to proposed Gap and Parish Boundaries.

Appendix 1: Landscape and Visual Appraisal

2.2 Gap 10 - Bursledon and Southampton, Netley and Hamble; and Gap 11 - Netley and Hamble, are both of relevance to the Site.

2.3 Of particular note are the following quotes from the Council's landscape and visual appraisal:

- Gap 10:
 - *'Although the urban edge of Hamble as designated in the adopted local plan is about 2Km south of the built up edge of Bursledon, there is a distinct small area of development in the open countryside between the two settlements north and south of the Hound Corner/Satchell Lane junctions with Hamble Lane, comprising the health centre, Hamble College and residential ribbon development.'*
 - *'Land at the northern end of the former airfield and land around Hamble College is not necessary to the function of the gap between Hamble and Bursledon' (our underlining).*
 - *'The generally open coastal plain landscape between Bursledon and Satchell Lane /Hound Road is more sensitive to erosion in terms of gap function than the former airfield site south of the railway.'*
 - *'The existing gap south of the railway east of Hamble Lane [i.e. the Site] makes little contribution to the separation of Hamble and Bursledon and its removal from the designation would result in a more credible and defensible gap designation.'*
 - *The areas identified which do not contribute to the function of the gap should be removed from the designation' (our underlining).*
- Gap 11:
 - *'At present there is no direct intervisibility between the main settlements of Hamble and Netley.'*
 - *The ribbon development at Broadway off Hamble Lane together with the educational buildings between Satchell Lane and the railway already urbanise part of the designated gap in close proximity to houses on the eastern edge of Netley.*
 - *Apart from the Royal Victoria Country Park, the most sensitive part of the remaining gap between the two settlements comprise the open fields south west of Hound Corner.*

- *In contrast, the former airfield makes little contribution to the perceived gap between the settlements and south of the railway this function is mainly achieved through the presence of the predominantly undeveloped RVCP and its hinterland, heavily enclosed by mature tree cover towards the northern end' (our underlining).*
- *Development between Satchell Lane and Hamble Lane on the former airfield site would significantly change the urban form of Hamble but would not fundamentally undermine the separation between Hamble and Netley providing the fields south west of Hound Corner remain undeveloped' (our underlining).*
- *'The fields south west of Hound Corner should be regarded as a critical part of the gap (subject to the outcome of the appeal re this site [appeal dismissed]).*
- *Assuming the fields south west of Hound Corner remain undeveloped, the land east of Hamble Lane on the former airfield site should be taken out of the gap' (our underlining).*
- *'The areas identified which do not contribute to the function of the gap should be removed from the designation.'*

2.4 It is clearly evident from the Council's landscape and visual appraisal, that the land at Hamble Airfield does not serve to maintain the separation between the settlements, and that it should be removed from the proposed Local Gaps. Yet, the draft Local Plan still included the northern part of the airfield within the Gap.

3.0 Eastleigh Borough Settlement Gap Study (October 2020)

3.1 The Settlement Gap Study has been prepared by Deacon Design Ltd in collaboration with Eastleigh Borough Council. It provides an updated evidence base for the draft Local Plan and the proposed modifications to Settlement Gaps. The objective of this Study is to provide robust evidence in order to evaluate the appropriateness of existing Settlement Gaps, and where applicable propose modifications to these gaps.

Methodology

3.2 The Study states that the methodology is derived from the core criteria for the designation of gaps recommended in the Policy Framework for Gaps produced in 2008 by the Partnership for Urban South Hampshire ('PUSH'). The core criteria are as follows:

- *'Assessment of the open nature/sense of separation between settlements at risk of coalescence.*

- *Whether 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.*
- *In defining the extent of a Gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.*' (Our underlining)

3.3 The methodology also notes that the PUSH Spatial Position Statement (2016) identifies the important role of gaps in maintaining the countryside setting for local communities as part of protecting settlement identity.

3.4 The methodology identifies the Study Areas which form the basis of the gap assessment. The Site is located within Area A – Burlsdon, Southampton, Netley and Hamble Settlement Gap, a significant land parcel which encompasses the land between the four settlements. These Study Areas are assessed through a combination of desktop study and field work. The methodology states that the field work consists of four parts:

1. Settlement and settlement edge characterisation;
2. Gap characterisation, including the experiences of different users moving between settlements and the frequency of use;
3. Recording viewpoints illustrating landscape and the function of the gap, including inter-visibility between settlements;
4. Analysis of gaps contribution to settlement identity, openness, separation functions, landscape features and opportunities for landscape enhancements and green infrastructure improvements.

3.5 In addition, the methodology notes that assessors recorded the experience of leaving / arriving at different settlements.

3.6 Following fieldwork the Study Areas were broken down into sub-areas which the methodology states perform a similar role in respect of settlement separation. The methodology does not provide any further clarity on how the sub-area boundaries were defined. These Sub-areas were then evaluated against five core criteria, based on the PUSH guidance, as follows:

- *'The area helps preserve the open nature of the Gap.*
- *The area helps maintain the sense of separation between settlements.*
- *The area plays an important role in defining the settlement character.*
- *The area plays an important role in separation of settlements at risk of coalescence.*
- *The land is necessary in preventing the coalescence of settlements.'*

3.7 These criteria provide a summary of the functions which land included within a settlement gap should provide. However, they do not provide a framework for undertaking a meaningful assessment of whether land within a sub-area meets a particular function. It is not clear from the methodology how each of these criteria

have been assessed, and what information has been used to inform decisions on whether or not a sub-area meets one or more of the criteria. For instance, what factors have been used to assess the role of a parcel in maintaining separation, or its contribution to settlement character. Further clarity on how factors such as inter-visibility between settlements, settlement edge treatments or perceptual factors such as the sense of entering or leaving a settlement have informed these criteria is clearly required.

- 3.8 It is also unclear what role 'openness' plays in defining settlement separation. The Inspector's post hearing advice (ED71) raised concerns about reference to 'openness' in the wording of Policy S8, which the Inspector stated was at odds with the primary purpose of designating settlement gaps, which is to prevent settlement coalescence and define settlement character. There is no clear definition of what constitutes openness in the Study's methodology. It is not clear if this is the absence of built development, or does it also include tree cover, which conversely can restrict visibility and assist in maintaining settlement separation.
- 3.9 The above criteria are also repetitive. The second, fourth and fifth criteria are all related to maintaining separation between settlements, and are effectively indistinguishable from one another. This skews any assessment, as a sub-area which meets one of these criteria will inevitably meet the other two.
- 3.10 The methodology also makes no mention of the third PUSH criteria, namely to include no more land within a gap than is necessary to prevent visual and physical coalescence. This was also a fundamental requirement of the Inspector's post hearing advice. There is no reference within the methodology to this criteria and to what extent this has been fully considered within the Study.
- 3.11 The methodology also includes a number of complementary criteria:
- The risk of gap fragmentation;
 - Role of gaps in maintaining countryside setting for local communities where it is an integral part of protecting settlement identity; and
 - Consider removing large woodland areas from the edge of gaps.
- 3.12 The methodology applies equal weight to both the core and complementary criteria. However, it is unclear how these additional criteria add much value to the assessment of gap function, and these additional factors could easily be addressed within a comprehensive boundary review or settlement separation assessment. In addition, the assessment against the core criteria appears to be a simple tick box exercise. This approach is very black and white, as it should be assumed that there will be some variation in the performance of sub-areas against each criteria. This is a fairly blunt approach to determining the performance of each sub-area, without further analysis and explanatory text.
- 3.13 The methodology states that green infrastructure opportunities have been considered for the sub-areas. It also states that opportunities to strengthen existing gap boundaries, or provide stronger alternative boundaries have been considered. A comprehensive review of the existing gap boundaries and

consideration of alternative boundaries is a fundamental requirement of a gap study. The degree to which this has taken place is discussed further in the section below. In terms of wider green infrastructure provision, this is not a function of gap policy per se, which is effectively a spatial planning tool. It is also not clear how, where green infrastructure opportunities have been identified, through what mechanism these would be delivered.

- 3.14 Overall, the methodology is somewhat confusing. It is difficult to understand how the factors which have been identified through the desktop and field work studies form a basis for the evaluation against the identified core criteria. In addition, these criteria are repetitive and should be refined to address the two key requirements of the gap policy identified by the PUSH guidance and highlighted by the Inspector, namely maintaining visual and physical separation between settlements, and preserving settlement identity. In addition, the methodology should be explicit about how it has identified parcels of land which do not fulfil this function, and therefore should not meet the requirements of a settlement gap policy.

Gap Analysis – Area A Bursledon, Southampton, Netley and Hamble

- 3.15 The first part of this section contains a high level analysis of the main characteristics of Area A, under a series of headings. The following points are of relevance to the Site at Hamble Airfield, and are set out below under the appropriate heading and with a short commentary:

Hamble Settlement Edge Character

'Historically, Hamble's relationship to the waterfront has defined the settlement pattern and isolated nature of its character, whereas its northern edge is less defined and includes numerous land uses comprising the following:

- *Industrial uses and the Hampshire Constabulary Training Headquarters to the west, which are well contained by mature woodland and tree belts that creates a soft and visually impermeable edge to the settlement;*
- *Ribbon development along Hamble Lane and Satchell Lane that largely consist of single / semi-detached twentieth century dwellings with larger gardens that back onto the former airfield; and*
- *Late twentieth suburban housing to the south of the former Hamble Airfield offering glimpsed views from 1st storey windows over the Hamble Railway Trail and associated vegetation.'*

- 3.16 The Site at Hamble Airfield is located at the northern edge of Hamble, and as noted above the settlement edge is less well defined at this point and comprises a variety of land uses.

Sense of Arrival / Leaving

Hamble Lane

'Forming the main road link between Hamble and the southern settlement edge of Bursledon, Hamble Lane also supports connections to Netley along

Hound Way. Whilst the sense of arrival to Bursledon is clearly defined by built form, the sense of arrival to Hamble is somewhat un-even due to the fragmented nature of development that has established along this main road. This includes the cluster of development around the Hamble Lane/Hound way roundabout, The Hamble School, and Hamble Train Station. Nevertheless, the retained mature oaks south of the Train Station and ribbon development retain some sense of arrival to Hamble.'

- 3.17 As noted, this is the principle vehicular connection between Bursledon and Hamble. It is also evident that the sense of arriving in Hamble is first experienced adjacent to the cluster of built development north of Hamble Rail Station.

Satchell Lane

'Located further east, Satchell Lane has a greater rural lane character and is used less than Hamble Lane to travel between the settlements. For those travelling along Satchell Lane from Hamble Lane, the sense of arrival to the settlement is not experienced until the junction to Mercury Boatyard at which point the settlement reverts to housing and ribbon development.'

- 3.18 As discussed in Section 5, our own assessment of the approach on Satchell Road, identified that the first sense of arriving in the settlement is experienced in the vicinity of Hamble School.

Public Rights of Way

- *'Bridleway No. 9 connects Satchell Lane, Hamble to Hungerford, Bursledon. Some parts run through mature woodland, offering a clear sense of separation both physically and visually between Hamble and Bursledon.'*
- *Hamble Rail Trail / Royal Victoria Country Park offers a series of recreational routes along the former railway line and parkland landscape. This creates a strong sense of separation between Netley and Hamble.'*

- 3.19 There is no inter-visibility between Hamble Airfield and the rights away identified in the Study.

Gap Boundaries

- 3.20 In respect of Hamble the Study notes that the Hamble edge is complicated including industrial development, open field and hedgerows. No further analysis of suitable alternative gap boundaries is included.
- 3.21 Figure A5 – Field Findings Plan (see extract below) illustrates the findings of the field work in respect of the wider gap within which the Site is located. This plan identifies that the sense of arriving / leaving Hamble on Hamble Lane is at the crossing over Hamble Station, with a second arrival / leaving point a short distance south, where linear residential development occurs to the east of the lane. On Satchell Lane the sense of / arrival / leaving is identified as opposite the Mercury Boatyard. A number of key views are also identified across the northern part of Hamble Airfield from locations on Hamble Lane and Satchell Lane, however there is no description of these views or what relevance they have to the function of the gap. Observation 1

notes that Satchell Lane has a strong hedgerow structure and provides a rural character between the settlements.

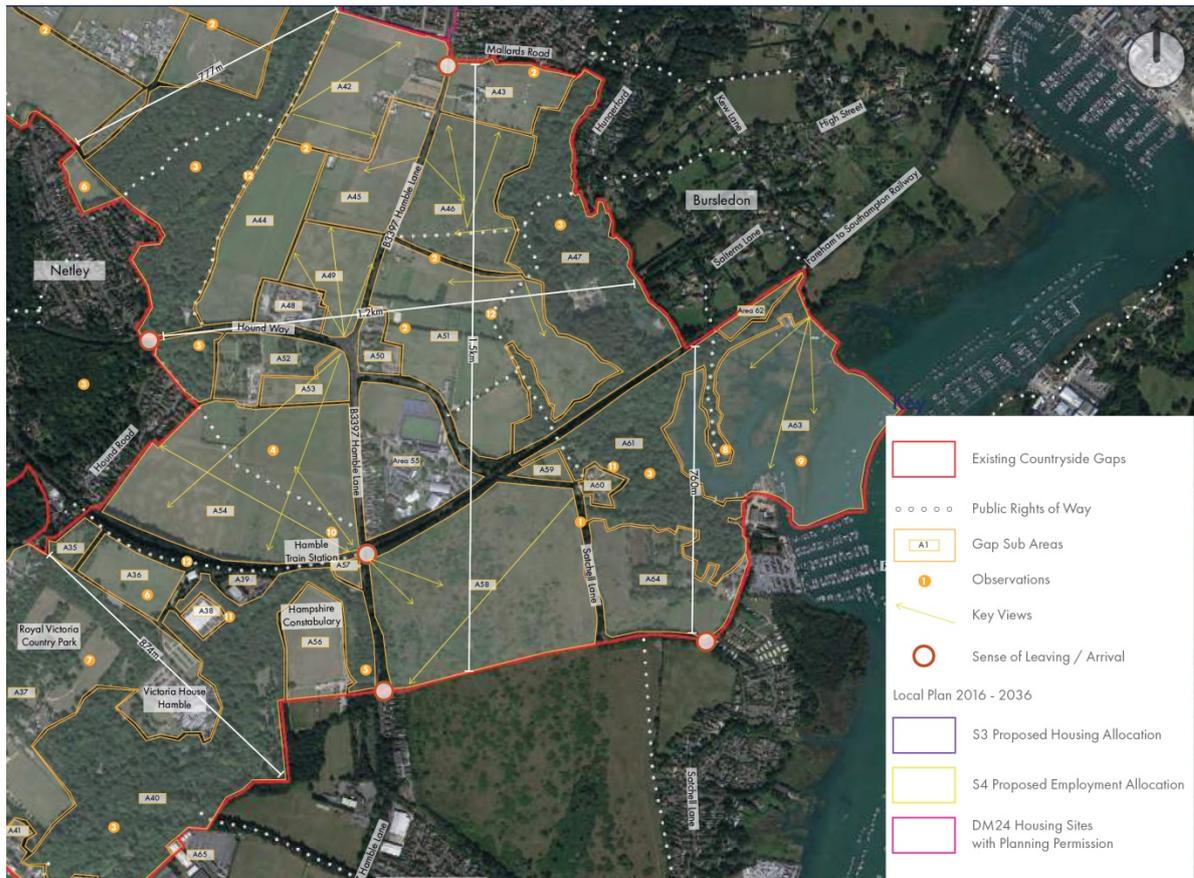


Figure 2 – Extract from study – 'Figure 5A-Field Findings Plan'

3.22 The second part of the gap analysis briefly considers the identified sub-areas within Area A. Overall, the Study has identified 65 sub-areas within Area A. These parcels range in scale, with a high number of very small parcels, and a large number of parcels which comprise large blocks of woodland, or built development. This results in a rather piecemeal approach to the assessment, and it is difficult to understand the rationale in many cases for sub-dividing the Area to this degree. It would seem more logical to identify wider land parcels, and then consider the degree to which the individual elements contribute to settlement separation within these parcels. For instance, does the presence of built development reduce the sense of separation, or does a high degree of woodland cover aid visual separation. This would allow a greater understanding of the function of individual sub-parcels.

3.23 The Site occupies sub-area A58, which comprises the northern part of Hamble Airfield. The Study describes sub-area A58 as follows:

'Former airfield site. Significant uniform area of open grassland and scrub with informal recreational access stretching from the south of the railway line to the Gap boundary that runs from Satchell Lane in the east to the properties along Hamble Lane. The latter contributes to the sense of arrival to Hamble and transition from the railway station to the settlement edge to the south. The area separates the main Hamble settlement from the cluster of development established to the north of the railway line.'

- 3.24 It should be noted that the cluster of development to the north of the railway contains Hamble Railway Station and the buildings and playing fields at Hamble School, and to all intents and purposes forms part of the wider settlement at Hamble. As discussed later in Section 5, the sense of arriving in Hamble is experienced to the north of the railway line. This is reinforced by the 'Welcome to Hamble-Le-Rice' sign, which is located approximately 300m north of Hamble Railway Station. This point is acknowledged earlier in the Council's Study.
- 3.25 The analysis and evaluation section considers that sub-area A58 meets all of the core criteria identified in the assessment methodology, although there is little / no evidence produced to support these judgements. In respect of sub-area A58 it concludes as follows:

'This large area is important in preserving the open nature of the Gap south of the railway line and protecting the integrity of the Gap. It separates the main settlement from a cluster of developments eroding the Gap along Hamble Lane. Despite a relatively long distance from Bursledon and its location south of a railway line, it is necessary to remain in the Gap to avoid the creation of a secondary Hamble settlement separated from the main village; and to prevent the coalescence of the main Hamble village with the developments to the north of the railway line, which would be detrimental to the character and identity of the village and could lead to its coalescence with Netley.'

- 3.26 This description assumes that any development within the northern part of the airfield would come forward in isolation. In reality, this area forms part of the wider airfield, with the southern part not included within the gap. Development within the airfield as whole would extend the main built up area of Hamble north to the development associated with Hamble Railway Station. It would clearly not result in a secondary or satellite settlement. In addition, it would not result in coalescence with Netley, as it would not extend any further into the existing gap between these settlements than the existing development on Hamble Lane. The Study acknowledges that the airfield is located some distance from Bursledon, and therefore plays no role in preventing coalescence between this settlement and Hamble.
- 3.27 The Study recommends a number of alterations to the existing gap boundary between Bursledon, Southampton, Netley and Hamble. This mainly involves removing areas of existing woodland, including much of the wooded area to the east of Hamble Airfield. The rationale for removing these woodland blocks, is that woodland is protected by other planning policy. However, the reality is that in many instances the boundaries to the gap would be recast along woodland edges, rather than existing settlement edges or more durable features such as roads. This also seems a rather odd approach. If the woodland provides a robust and durable boundary which helps maintain settlement separation it would logically remain in the gap. Further consideration of suitable gap boundaries should be undertaken.
- 3.28 This Study provides a very high level assessment of the functions of the gap between Bursledon, Netley and Hamble. There is no evidence that any detailed visual analysis of the separation between these settlements has been undertaken,

nor does it contain a robust assessment of the gaps existing boundaries, or consideration of robust alternative boundaries. It is unclear what rationale underpins the selection of the sub-areas, and why so many small sub-areas have been identified. In addition, it is unclear how judgements regarding the sub-areas performance against the core criteria have been reached, and there is no clear methodology to underpin these findings. There is an absence within the report of evidence of more detailed assessment work, and the Study lacks a transparent methodology which makes a clear connection between the findings of the Desktop Study / Field Work and the assessment of each sub-area. Accordingly, the Study as it currently stands does not provide a robust assessment to support the retention of the Settlement Gap at its proposed extent.

4.0 Hamble Parish Boundary

- 4.1 Eastleigh Borough Council undertook a Community Governance Review in 2018, in which they considered changes to parish boundaries (see letter in **Appendix A**).
- 4.2 Hamble Parish Council proposed to the Borough Council that the Hamble parish boundary be altered in the north of the parish, to include the houses and playing fields north of Satchell Lane and the access road to the Hamble School, and to the west of Hamble Lane which were within the adjoining Hound parish.
- 4.3 Hamble Parish Council state in their letter to Eastleigh Borough Council (reference CRG/EBC220118 – 1610) setting out the reasons for the requested boundary change, that:

'More importantly though the Council feel that by extending the boundary up to the current Bursledon boundary ... that Hamble will have more influence in defending the strategic settlement gap.... The land that forms this section is the most critical part of the strategic settlement gap in many ways for Hamble...

... Lastly the re-designation being proposed respects existing boundaries within Bursledon and landmarks which can be recognised and understood. In conclusion Hamble PC believe that the proposal is a sensible one reflecting community use, buildings, landscapes and priorities of the parish council and the residents of Hamble' (our underlining).

- 4.4 As set out within our assessment of the separation of the settlements in Section 4, we agree with the Parish Council, that the most important part of the gap between the settlements occurs to the north of the existing houses, school and leisure centre to the north of the Hamble Airfield and the railway line. The letter also makes it clear that the community consider these buildings and uses to be located within Hamble.
- 4.5 Therefore, when approaching the settlement at Hamble from the north along Hamble Lane, the entrance to the settlement occurs to the north of the railway line and north of the Airfield. Development at the Hamble Airfield will therefore clearly be located within Hamble, and will be perceived as such; a view which must be supported by the Parish Council, given their comments within the letter in relation

to their parish boundary. Development at the Site will therefore have no effect on the actual or perceived separation between Hamble, Bursledon and Netley.

5.0 Perception of the gap between settlements

- 5.1 The previous section has considered the Council's evidence base used to inform the identification of gaps within the Local Plan. This section of the report considers the perceptual aspects of the existing separation between settlements on the Hamble Peninsula. It then goes on to consider the impact on the separation of settlements by releasing the former Hamble Airfield for development.
- 5.2 To inform the assessment of the Site and surrounding area, CSA revisited the Site in August 2020.
- 5.3 In looking at the perceptual qualities of the land between the settlements, the following criteria have been used:
- Character of the countryside between settlements;
 - Intervisibility between settlements; and
 - Travelling between neighbouring settlements by: road; footpaths and rail and the perception of entering one settlement and leaving another.

Character of the countryside between settlements

- 5.4 The Hamble Peninsula has a varied landscape character, which primarily comprises a mix of pasture, former mineral extraction sites, horticulture and areas of untended grassland. The area as a whole also has substantive areas of mature woodland and a well-defined network of hedgerows. Between the settlements there are also pockets of light industry, which are mainly linked to the maritime industry, leisure uses, such as caravan and camping sites, clusters of buildings associated with the horticultural trade, and infrastructure.
- 5.5 In respect of the gap between the Site and Netley, Bursledon and Hound, many of these characteristics are evident. Immediately to the north of the Site there is also Hamble School, Hamble Leisure Centre, playing fields and a health centre. To the north of Hamble railway station there is also a linear belt of housing which faces on to Hamble Lane. As set out in Section 4, the Parish Council consider these buildings and uses to be located within Hamble.

Intervisibility between settlements

- 5.6 The relatively low-lying nature of the Hamble Peninsula, combined with substantive areas of woodland planting, well treed hedgerows, and the belt of woodland alongside the railway, means that there is currently very little intervisibility between neighbouring settlements. This is evident from photograph 1 which is taken from within the Site, looking in a northerly direction towards Netley and Bursledon.
- 5.7 If the Site were to be developed for housing and employment uses, which did not exceed 3 storey in height, then there would be little or no intervisibility with the

neighbouring settlements of Netley and Bursledon. If there were some isolated opportunities for views of development on the Site, these could be mitigated by additional woodland planting. As such there would be no visual coalescence of settlements.



Photograph 1 - Northerly view from within the Site.

Travelling between neighbouring settlements by: road; footpaths and rail and the perception of leaving one settlement and entering another

- 5.8 As noted above, the character of the countryside between the settlements on the Hamble Peninsula is varied, but it does allow those travelling between the various settlements to experience the fact that they are leaving one settlement, travelling through an area of predominantly open countryside, and then entering another. The current sense of separation is also reinforced by the extent of intervening vegetation which limits the opportunities for intervisibility.

Approaching the Site by:

Road

- 5.9 The two vehicular approaches to Hamble are on Hamble Lane and Satchell Lane.
- 5.10 At the roundabout junction of Hamble Lane and Hound Road, there is a sense of leaving the open countryside and approaching Hamble. This arrival point is marked by the housing fronting onto this section of Hamble Lane and the health centre which is set behind it.

- 5.11 A short distance down the road one arrives at the junction of Hamble Lane and Satchell Lane and the sense of entering Hamble is strengthened as the Hamble School, floodlit playing fields, and housing fronting on to Hamble Lane come in to view.
- 5.12 As one progresses southwards along Hamble Lane to the railway station the 'Welcome to Hamble-le-Rice' sign appears and at this point and it is evident that you have entered the body of the settlement. The Site lies to the south of this, as does the main vehicular access in to it.



Photograph 2 - School playing fields and housing on Hamble Lane.

- 5.13 On approaching Hamble on Satchell Lane, the entrance to the settlement is largely defined by Hamble School and Sports complex. Having passed the school and crossed over the railway, the Site is largely screened from view by dense roadside vegetation.

Footpaths

- 5.14 There are several public footpaths leading into Hamble, as well as a footpath along the eastern boundary of the Site.

Hamble Way footpath on the eastern boundary of the Site

- 5.15 This footpath runs from Hamble Lane to Satchell Lane, and for much of its length it borders a band of woodland. Immediately to the east of the footpath lies the housing within Hamble which is readily visible. At the northern end of the footpath, immediately to the east, is a pocket of open land which has outline planning permission for residential development. Given these circumstances, the footpath plays no material role in separating Hamble from neighbouring settlements.

Approach to Hamble-le-Rice from the west

- 5.16 To the west of Hamble Station, a footpath leads from Hound and Netley to Hamble. This footpath largely transverses open farmland. However, as one approaches Hamble, the housing which fronts on to Hamble Lane comes into view and as such, at this point, there is a sense of entering Hamble. The Site is however screened from view by the housing and dense woodland belt to the south.



Photograph 3 - Approach to Hamble from land to the north west of Hamble Station.

On approaching Hamble from footpaths to the north

- 5.17 In approaching Hamble from the footpaths to the north, the dense vegetation alongside the railway, and elsewhere within the area, screens the Site from view.

Railway

- 5.18 As the railway line is for the most part in a cutting, with dense vegetation on either side, the Site is screened from view and as such, there is no sense of leaving one settlement and entering another at this point.



Photograph 4 - View from Hamble Lane along the railway. The Site lies on the left of the photograph of the railway.

Conclusion

- 5.19 From our analysis of the separation between settlements on the Hamble Peninsula, it is evident that release of the Site for development would not result in physical or visual coalescence between Hamble and the neighbouring settlements. In reaching that conclusion, we have assumed that development would not exceed 3 storeys in height.

Appendix A

HAMBLE-LE-RICE PARISH COUNCIL



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Kath Richards
Senior Specialist (Elections and Democratic)
Strategy - Performance and Governance
Eastleigh Borough Council
Eastleigh House
Eastleigh
SO50 9YN
Reference: CRG/EBC220118 - 1610

Dear Kath

The Council met last night and considered its position with regard to the CGR and our boundaries and ward arrangements. The Council resolved to apply for a change to the boundary arrangements with Hound Parish Council. The Council wish its northern boundary to extend to the boundary with Bursledon Parish Council and to the east of the centre line of Hamble Lane. It gave the matter careful consideration and its reasoning is as follows:

The current boundary that dissects Hamble School Campus is irrational and has resulted in the School reverting to Hound Parish Council rather than Hamble despite a significant portion of the school sitting within Hamble PC. Ensuring that the School is entirely within one parish will help to strengthen relationships with the school and ensure that their issues are better understood within the Parish. In a similar vein Blackthorn Surgery sits just outside the Hamble boundary and although it serves both parishes most residents consider it is within Hamble. Perhaps most importantly is the fact that the way both organisations operate has a real impact on Hamble residents that adjoin the site in terms of congestion and access and rearranging the boundary would better enable these types of issues to be addressed.

With a realignment of the boundary it would also bring in a number of locations where currently there have been repeated issues with fly tipping, footpath maintenance and access all of which impacts Hamble residents but which we have little influence.

More importantly though the Council feels that by extending the boundary up to the current Bursledon boundary and to the centre line of Hamble Lane that Hamble will have more influence in defending the strategic settlement gap. Residents in the recent We R Hamble survey highlighted their desire for Hamble to maintain its unique character as a marine village with a very different history, character and form to its neighbouring Parishes. The land that forms this section is the most a critical part of the strategic settlement gap in many ways for Hamble and in the previous review the Council request to amend the boundary in part reflected this. The current proposals for MDL illustrate the point well. The development will impact on Hamble residents almost exclusively yet the current boundary means that Hound PC will be an equal consultee on the application. Ensuring that we can exercise influence over the River Hamble is a key priority for the Council and residents and the current arrangements reduce that influence.

Lastly the re-designation being proposed respects existing boundaries with Burseldon and landmarks which can be recognised and understood. In conclusion Hamble PC believe that the proposal is a sensible one reflecting the community use, buildings, landmarks and priorities of the parish council and the residents of Hamble.

Yours sincerely

Amanda Jobling
Clerk