

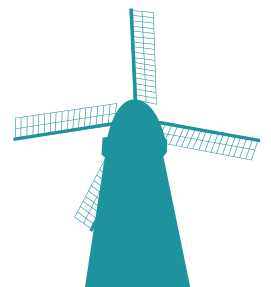
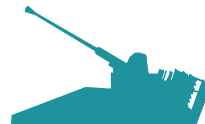
Eastleigh Borough Local Plan 2016-2036



Eastleigh Borough Local Plan 2016-2036

Environmental capacity background paper

June 2018



This background paper supports the Eastleigh Borough Local Plan and provides background information on factors constraining development in the borough. This document is not on deposit for consultation and is background evidence.

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1. Introduction & Summary

- 1.1 The borough of Eastleigh is a compact, suburban, semi-rural urban fringe authority located between the major urban conurbation of Southampton and the rural southern parishes of Winchester district and the eastern extremity of the South Downs National Park.
- 1.2 It is a well-connected borough at the junction of two motorways, with a fast (just over an hour) and frequent mainline rail service to London. It has its own international airport.
- 1.3 At 2016 it had a population of 129,500 (2016-based SNPP¹) accommodated in an area of just 79.8 km² equating to an average population density of 15.7 people per hectare - this is significantly higher than the South East and England & Wales population density figures of 4.5 and 3.7 respectively (2011 Census)².
- 1.4 The 2011 Census records that the borough contained 53,401 dwellings. A further 1,674 were completed in the period 2011 to 2016 and the local plan makes provision for a further 14,580 dwellings to be delivered during the plan period 2016 to 2036. This means that, by the end of the plan period in 2036 the borough will have seen a 30% increase in dwellings in 25 years.
- 1.5 The main settlement in the borough is Eastleigh town. The borough includes two other large urban areas at Chandlers Ford / Hiltingbury and Hedge End and some sizeable settlements at Bishopstoke, Fair Oak, Horton Heath, West End, Bursledon, Botley, Hamble and Netley.
- 1.6 The borough's countryside varies in character from the relatively flat and open countryside bordering the coast to the gently rolling wooded areas to the north. It includes the valleys of the River Itchen and the River Hamble, and a coastline that borders Southampton Water from Netley to the Hamble peninsula, including the estuary and west bank of the River Hamble which is tidal as far north as Botley. The coast and rivers are important areas of biodiversity interest, which are subject to international and national designations. However the borough is also recognised for its ancient woodland, wet woodland and hedgerow network that extend through much of the countryside and the interlacing stream and gully network associated with the main rivers.
- 1.7 With Southampton in close proximity, and the borough's own compact network of settlements, the borough's countryside plays an particularly important role in separating settlements and ensuring that they retain their individual identity distinct from each other and from neighbouring Southampton. Some areas of the countryside are suffering from poor management and pressures from development and public access. These activities, along with emissions for transport and industry, are impacting on the environmental quality of the borough. Of particular concern at a strategic level is air quality due to emissions from the motorways and transport networks and the water quality of the important river systems due to agricultural runoff and pollution from the urban area.

¹

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

² http://www3.hants.gov.uk/2011_census_eastleigh_summary_factsheet.pdf

- 1.8 Parts of the borough's countryside are of high agricultural quality, particularly in the southern parts of the borough where there are areas of grades 1 and 2 agricultural land. With the rising costs of food imports and the costs and environmental impacts of transportation, the retention of opportunities for local food production is likely to be of increasing importance.
- 1.9 The green infrastructure network provides recreational space for the existing and future population, habitats for the borough's wildlife and connects natural habitats and settlements within the wider network including across borough boundaries. The borough contains a wide variety of green infrastructure with country parks, wildlife reserves, sports facilities, recreation grounds and allotments.
- 1.10 The borough contains four Country Parks; the Royal Victoria Country Park and the Manor Farm Country Park in the south, Lakeside Country Park at Eastleigh and the Itchen Valley Country Park at West End. Westwood Woodland Park at Netley is a local nature reserve and there is a wide network of international, national and local designated sites throughout the borough.
- 1.11 Eastleigh is a relatively prosperous borough; the third most prosperous economy in the Solent LEP area with over 6,200 business units employing approximately 62,200 people³. It has around 1,100,000m² of employment floorspace. Of this, the majority of floorspace is in the form of factories and warehousing reflecting the borough's industrial heritage, although relatively large amounts of office, factory and warehousing floorspace have been developed in more recent times (since 1990). The most extensive industrial areas are at Eastleigh, Chandlers Ford, Hedge End and Hamble. In 2014 it is estimated that the borough generated over £3.5 billion of goods and services.⁴
- 1.12 ***All of this paints a picture of a compact and densely populated borough which hosts a suite of important environmental and ecological designations and yet is facing significant pressure for new development. When allied to a desire to protect and maintain locally important gaps between settlements (in order to preserve the character of individual towns and villages and to prevent them merging together and/or merging with the much larger neighbouring Southampton City), it is clear that there are limits to the amount of additional development which could reasonably be accommodated in the borough without compromising important and justifiable environmental objectives.***
- 1.13 This background paper does not seek to repeat the detailed analysis of the character and value of the borough's countryside and landscape, nor the precise detail of the development pressures facing the borough. These are set out in other evidence based documents which have been produced in support of the local plan; not least the sustainability appraisal, habitats regulations assessment, landscape character assessment, countryside gaps analysis,

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<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/businessregisterandemploymentsurveybresprovisionalresults/provisionalresults2016revisedresults2015>

⁴ https://www.eastleigh.gov.uk/media/1652/1701-eastleigh-economy-review-ele2016_130117.pdf

housing trajectory, transport assessment and so on. However, it seeks to draw out the key impacts which the council considers severely limit the borough's ability to accommodate significant levels of additional development over that which already exists or is being planned for.

- 1.14 The spatial extent of these environmental constraints is summarised on Map 1 at the end of this paper (page 33).

2. Policy Background

- 2.1 The National Planning Policy Framework (NPPF)⁵ clearly establishes (paragraph 6) that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 7 of the NPPF states that:

“There are three dimensions to sustainable development - economic, social and environmental - which give rise to the need for the planning system to perform a number of roles”.

- 2.2 These roles include meeting the needs (employment, housing and infrastructure) as well as protecting and enhancing the environment. The NPPF (paragraph 8) states that:

“These roles should not be undertaken in isolation because they are mutually dependent”.

- 2.3 Clearly, in trying to meet the future needs of people within the borough it is vital to have an understanding of the capacity of the receiving environment to accommodate growth. Without this, it would be difficult to protect and ensure the future integrity of the environment in order to deliver sustainable development as required in the NPPF.

- 2.4 Paragraph 17 of the NPPF establishes 12 'core planning principles'. These are focused on the achievement of sustainable development and meeting identified needs except where the adverse impacts of doing so would significantly and demonstrably outweigh the benefits (Paragraph 14). The core principles include a need for the planning system to:

“take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”

“contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework”

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

“encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”

“promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)”

“conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations”

2.5 Many of these principles are elaborated in Section 11 of the NPPF on ‘conserving and enhancing the natural environment’. In particular paragraph 109 notes that:

“The planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, geological conservation interests and soils;*
- recognising the wider benefits of ecosystem services;*
- minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability; and*
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”*

2.6 Paragraph 113 requires local planning authorities to include policies in local plans against which development proposals on, or affecting, protected wildlife sites will be judged. It makes clear that the level of policy protection afforded protected sites in local plans should be:

“...commensurate with their status and gives appropriate weight to their importance and the contribution they make to wider ecological networks.” (para 113)

2.7 This is elaborated in paragraphs 115 & 116.

2.8 Paragraph 114 requires that local authorities should:

“...set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”

2.9 Paragraph 117 requires that authorities should:

- *plan for biodiversity at a landscape-scale across local authority boundaries;*
- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*
- *promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.”*

2.10 There is, therefore a clear policy basis for both seeking to recognise the value of the countryside in its own right and protecting areas which perform important environmental, ecological and landscape roles, as well as taking full account of the environmental impacts of new development in the preparation of local plans and making planning decisions.

3. Development Needs

3.1 The Eastleigh Borough Local Plan 2016 to 2036 (EBLP) makes provision in Policy S2 for the delivery of a minimum of 14,580 new dwellings during the plan period (all housing figures quoted in this section of the paper are net of losses). This equates to an average annualised rate of delivery of 729 dwellings per year. However, total supply, taking into account discounts and contingencies applied to various components of supply, is estimated in the housing trajectory to be 14,950 dwellings which equates to an annualised average figure of 747.5 dwellings per year.

3.2 This compares to:

- a planned rate of delivery in the adopted local plan (covering the period 2001-2011) of 5,608 dwellings as a baseline level of provision (560pa annualised average) with 395 held in reserve (40pa annualised average) making a total provision of 6,003 (600pa);
- a target of 10,140 in the failed 2011-2029 local plan (annualised average of 563pa);
- an Objectively Assessed Housing Need (OAHN) figure of 580 dwellings per year set out in the original Strategic Housing Market Housing Assessment (SHMA) carried out on behalf of the Partnership for Urban South Hampshire (PUSH) authorities;
- an updated EBC assessment of OAHN subsequently set at 630 dwellings per year;
- a target calculated by the application of Government’s draft Standard Housing Methodology of 715 dwellings per year; and finally
- annual delivery in the recent past (2011 to 2016) of an average of 335 dwellings per year
- completions in 2016/17 of 515 and (provisionally) in 2017/18 of 893.

Area	PUSH OAHN	PUSH SPS	Surplus Deficit	EBC OAHN	Stand Meth	Adopted Plan	11-29 Plan	EBLP Target	EBLP Provision	11-16 Comps
Eastleigh	580	650	+70	630	715	600	563	729	747	335
Fareham	115	89	-26							265
NF (pt)	210	157	-53							83
So'ton	1,115	846	-269		942	815				796
TV (pt)	185	202	+17			194				195
Winch(pt)	75	233	+158							146
HMA Tot	2,280	2,177	-103							1,820

- 3.3 Against whichever comparator the current local plan provision is assessed, the level of provision now being planned for is higher and, in many cases, considerably higher than the level required to meet any assessment of the borough's own housing need.
- 3.4 In terms of employment the EBLP is proposing to meet its full estimated employment need of 144,050m², a target derived from the PUSH Spatial Position Statement and supporting evidence.
- 3.5 Returning to housing, in spite of Eastleigh's high level of planned delivery and the fact it more than meets its own OAHN, it is acknowledged that there is a shortfall of planned provision in the wider Southampton Housing Market Area (HMA) within which Eastleigh borough sits. This shortfall equates to approximately 2,369 dwellings across the 6 districts / part districts which make up the HMA. It is the existence of this shortfall which may lead some to suggest that, even though Eastleigh is more than meeting its OAHN, it could and should take more development to make up this HMA shortfall. It is that possibility which has driven the need for the production of this environmental capacity background paper to consider what adverse impacts might arise if the EBLP was required to allocate a significant amount of additional land for development.
- 3.6 The borough council's primary response to any suggestion that it should allocate more land for housing development is that this should not be necessary. The council demonstrates in other evidence that there is more than sufficient flexibility and contingency built into the local plan housing trajectory to address any additional development needs or any uncertainty about identified sites being developed before there is a need to look at additional sites. As is explained in the housing trajectory report, in view of the failure of the previous draft local plan (which was found unsound largely on the basis of insufficient housing provision), the current housing trajectory is extremely cautious and builds in a number of discounts to various individual components of supply. These discounts range from 5% to 20%. If these discounts prove not to be necessary then there is already potentially between 1,000 and 2,000 dwellings worth of contingency built into the trajectory depending on how little or how much discounting is deemed necessary.
- 3.7 However, even with that flexibility built in to the land supply position, if it is considered that additional large greenfield sites might need to be allocated, the remainder of this paper sets out what adverse environmental impacts may arise from such additional allocations.

4. The Urban Nature of the Borough

- 4.1 As noted in the introduction, Eastleigh is a geographically small and compact borough. It has experienced significant growth in the last 50 or 60 year so is already substantially urbanised. The borough includes the towns of Eastleigh, Chandlers Ford and Hedge End, and the villages of Bishopstoke, Fair Oak, Horton Heath, West End, Boorley Green, Botley, Bursledon, Netley Abbey and Hamble. All of these towns and villages have experienced significant growth over this period.
- 4.2 This growth continues. The majority of the new housing likely to come forward during the plan period is already committed by way of planning permissions or council resolutions to grant planning permission. Including discounts, around 7,900 of the 14,950 dwellings anticipated to come forward during the plan period already have a planning permission or resolution to grant permission. Those commitments include large strategic scale developments on greenfield sites (which were originally allocated in the 2011-29 local plan) at Boorley Green (1,400 dwellings), Stoneham, Eastleigh (1,100 dwellings) and West of Horton Heath (1,400 dwellings). Both the Stoneham and Boorley Green developments are under-construction. A further 1,100 are in the planning 'pipeline' in the form of allocations from the 2011-29 local plan which have been carried forward into the EBLP – the majority of these dwellings are on sites which have already been subject to pre-application public consultation, the two largest being land at Woodhouse Lane, Hedge End and Uplands Farm, Botley (Policies HE1 and BO2 of the EBLP respectively). Around 3,300 are expected to be delivered by 2036 at the new Strategic Growth Option allocated in the plan (the total capacity of which is expected to be around 5,200 dwellings but the remainder will likely come forward beyond the end of the plan period). Around 1,900 dwellings are expected to come forward on small and large windfall sites leaving around 750 other newly allocated greenfield sites.
- 4.3 These developments are spread across the borough. Almost every town or village in borough is likely to see the loss of at least some greenfield land on its periphery to housing development as a result of either recent planning permissions (some decided at appeal), past allocations or new allocations proposed in the EBLP. Boorley Green will shortly be almost surrounded by new development on greenfield land on all sides. At a practical level, therefore, this means that a significant proportion of the Borough either already is, or soon will be, urbanised, thereby limiting the areas available for further green field development.
- 4.4 In terms of land take these developments equate to over 950ha of land. To put this another way, by 2036, in the preceding 25 years (2011 to 2036) almost 953.44 hectares of greenfield land or almost 12% of the borough's total land area will have been given over to new development. The vast majority of this (737.74ha) will have been housing development. This is broken down as follows (and is shown on Map 2 below).
- 4.5 Firstly, in terms of the current EBLP greenfield allocations, the plan allocates almost 500ha of land for development of which the vast majority is housing development.

Eastleigh Borough Local Plan 2016 to 2036 Greenfield Allocations – land take (hectares)				
Policy	Housing	Employment	Recreation / Other	Total
S5	150.0	7.5	142.5	300
FO1	4.15			4.15
FO2	1.0			1.0
FO3	14.5			14.5
FO4	0.7			0.7
FO5	0.9			0.9
BU1	1.1			1.1
BU2	3.4			3.4
BU3	3.8			3.8
HA2			4.7	4.7
HO1			10.5	10.5
CF3		1.9		1.9
E9		21.6		21.6
E10			18.3	18.3
AL1	7.76			7.76
AL2	4.2			4.2
HE1	51.1			51.1
HE2	4.2			4.2
HE3	0.6			0.6
HE4	3.6			3.6
HE5		1.8		1.8
WE2		1.6		1.6
WE3		0.8		0.8
BO1	1.0			1.0
BO2	26.0			26.0
BO3	6.18			6.18
BO4	1.1			1.1
Total	285.29	35.2	176	496.49

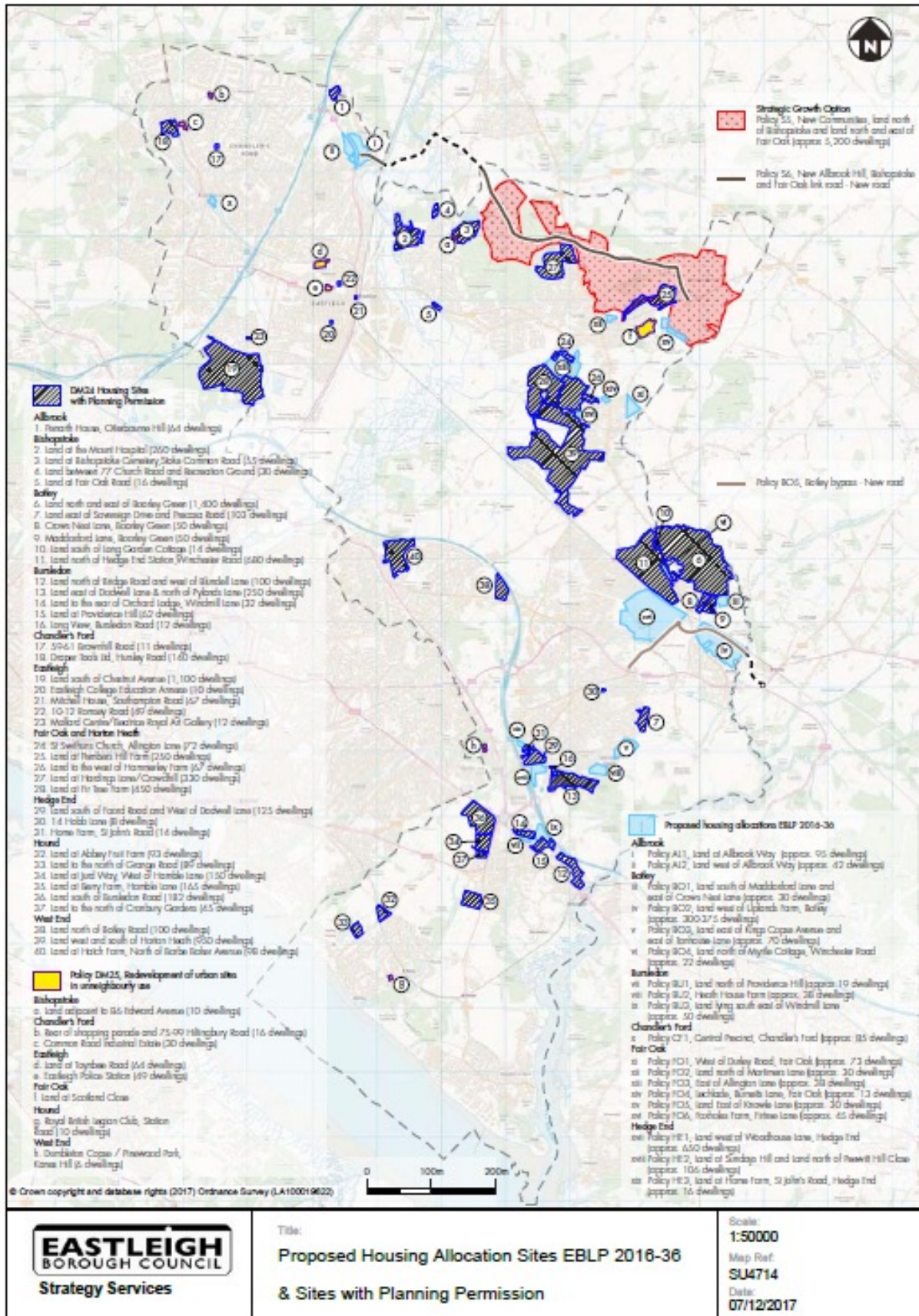
- 4.6 Secondly, in terms of the previous (failed) 2011 to 2029 version of the plan this allocated over 350 hectares of greenfield land for residential development (it allocated more but some has been carried forward in to the EBLP and is not listed twice to avoid any double-counting).

Eastleigh Borough Local Plan 2011 to 2029 Greenfield Allocations – land take (hectares)			
Policy	Housing	Employment	Total
Bi1	9.7		9.7
Bi2	7.0		7.0
BO1	81.6	1.9	83.5
BU1	5.3		5.3
BU2	9.2		9.2
BU3	20.9		20.9
E1	61.0		61.0
FO1	18.0		18.0
FO4	0.7		0.7
HE2	7.3		7.3
HE5		2.6	2.6
HO1	3.2		3.2
WE1	100.0		100.0
WE2	12.0		12.0
WE3	3.8		3.8
WE5	10.4		10.4
Total	350.1	4.5	354.6

- 4.7 Thirdly, in addition, over the past few years a number of further permissions have been granted for residential development on new, previously unallocated greenfield sites totalling just over 100 hectares.

Other greenfield sites granted permission		
Site	Dwellings	Area (hectares)
Firtree Farm, Horton Heath	450	27.9
Land north of Hedge End Station	680	45.41
Sovereign Drive / Precosa Road, Botley	103	4.28
Maddoxford Lane, Boorley Green	50	3.82
Crows Nest Lane, Boorley Green	50	3.1
Pembers Hill Farm, Fair Oak	250	12.44
Botley Road, West End	100	5.4
Total	1,683	102.35

Map 2: Housing permissions and allocations



5. Countryside Gaps

5.1 As a result of the compact nature of the borough, with 12 towns or villages located in an area of around 80km² and the major city of Southampton located immediately to the south / west of the borough, the distance between settlements is often small; in many cases, just a few hundred metres. Therefore much of the remaining areas of countryside form narrow gaps between settlements. It is important to protect these countryside gaps from development in order to maintain the distinct identity of individual settlements, prevent urban sprawl, and ensure people have access to local countryside. Like the Green Belt, countryside gaps are not a countryside protection policy per se. Rather they are primarily an urban planning policy tool which aims to protect the separate identity of towns and villages, to prevent urban sprawl and prevent settlement coalescence.

5.2 The identification and protection of countryside gaps is a long established aspect of planning policy across South Hampshire, as currently identified by the PUSH Spatial Position Statement (June 2016) (SPS)⁶. As one of 5 key principles which underpin the SPS, Principle D is “Protecting and Enhancing Countryside Gaps”. Paragraphs 5.12 and 5.13 of the SPS state that a key component of the preferred spatial approach is:

“5.12 Locating development in a way which creates a high quality pattern of town and countryside, maintaining the distinct identity and separation of key cities and towns, to avoid urban sprawl.

5.13 The Position Statement highlights the importance of countryside gaps and further work will be undertaken to define these gaps. Key country parks will be protected. Investment to enhance the quality of the countryside in recreational, landscape and ecological terms will be important.”

5.3 Position Statement S1, Strategic Countryside Gaps notes:

“Strategic countryside gaps between settlements are important in maintaining the sense of place, settlement identity and countryside setting for the sub region and local communities....

.....Councils should identify in their Local Plans other strategic countryside gaps of sub-regional significance as appropriate; and may also identify local countryside gaps which are of fundamental local importance in their area. The precise extent of gaps will be defined in Local Plans. Given the long term need for development, the number and extent of gaps should only be that needed to achieve their purpose.”

5.4 It is supported by paragraphs 5.75 to 5.77 which recognise the importance of strategic countryside gaps in maintaining the sense of place, settlement identity and countryside setting of the area and explain that Local Plans should identify strategic countryside gaps and other local countryside gaps of fundamental local importance:

⁶ <https://www.push.gov.uk/wp-content/uploads/2018/05/PUSH-Spatial-Position-Statement-2016.pdf>

“5.75 South Hampshire is due to accommodate considerable growth over the period to 2034. There is a need to deliver this in a way that will ensure the integrity of the highly valued natural environment and that key elements of the settlement pattern are maintained.

5.76 In a densely populated area such as this, a key part of the strategy is to ensure that the necessary development can be accommodated while preventing the coalescence of the separate communities of South Hampshire, with distinct communities retaining their own identity where possible. This will be achieved through the use of policies to encourage development within existing urban areas, and the identification of key areas of undeveloped land which serve to separate settlements (strategic gaps).

5.77 The identification of these strategic gaps is an integral part of the implementation of the Position Statement. They should be defined where necessary to prevent the coalescence of and protect the identity of distinct settlements; maintaining green infrastructure and countryside gaps of local importance. They are a mechanism which still allows development to come forward in appropriate sustainable locations, by giving communities the confidence to plan positively for growth, whilst ensuring there is room for the necessary complimentary uses, such as recreation areas, transport corridors, and environmental mitigation.”

- 5.5 It is also supported by the December 2008 PUSH “Policy Framework for Gaps”⁷. The Framework sets out the history of the evolution of gaps as a planning policy tool in Hampshire and the support given to them by local communities and through planning documents such as the Hampshire County Structure Plan and the South East Plan. In order to ensure consistency of approach across South Hampshire and to avoid the proliferation of gaps which could preclude sufficient land being made available for employment and housing development, the Framework sets out 3 key criteria which should be used in the designation of gaps (para 3.1):

“a) The open nature/sense of separation between settlements cannot be retained by other policy designations;

b) 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.

c) 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.”

- 5.6 The protection of countryside gaps within the borough is therefore part of a wider strategy to maintain a pattern of town and countryside across South Hampshire and prevent the broader Southampton and Portsmouth urban areas from merging.
- 5.7 The council’s background paper on Countryside Gaps⁸ (updated May 2018) explains this contextual background in much more detail and has fully reviewed these designations. As a

⁷ <https://www.push.gov.uk/wp-content/uploads/2018/05/Policy-Framework-for-gaps.pdf>

⁸ <https://www.eastleigh.gov.uk/media/2069/appendix-10-countryside-gaps-review-updated.pdf>

result the Council has reduced their extent where the designation is considered to no longer serve a purpose (and only added new countryside gaps in relation to the SGO).

- 5.8 Furthermore whilst the council's approach to allocating small and medium greenfield sites in the EBLP gives a strong priority to protecting countryside gaps, it has allocated sites within the previously designated gap for development where it is considered that this would not erode the underlying purpose of the gap. In other words whilst the protection of countryside gaps has been an important part of the council's approach to selecting development sites, it has not applied a rigid approach and has carefully considered which areas do genuinely need to be designated as gaps and which can be released, so as not to needlessly hinder development.
- 5.9 The council's engagement exercises have identified that the protection of countryside gaps is of major importance to local communities. The report of the 'Shaping Your Community'⁹ engagement exercise carried out between October and December 2017 identified the retention of countryside gaps between towns and villages as the 2nd most important issue to local residents (2nd only to reducing traffic congestion). It was chosen by almost 65% of the 1,600+ people who responded to the survey.
- 5.10 Accordingly the EBLP identifies the maintenance of the separate identity of towns and villages as key component of the vision of the local plan:

'To ensure development in Eastleigh Borough and its communities delivers a strong and sustainable economy with an adequate supply of housing and infrastructure that supports improved standards of living for residents while protecting the distinct identity of towns and villages and preventing urban sprawl; promoting thriving and healthy communities; and maintaining an attractive and sustainable environment that residents value.' (emphasis added)

- 5.11 It is also one of 13 local plan objectives:

*"iv. **Maintaining the identity of towns and villages** – Protect countryside gaps necessary to maintain the separation of distinct settlements and ensure major new development is designed to create new communities and neighbourhoods supported by high quality infrastructure including education facilities;"*

- 5.12 Strategic policy S8 of the local plan, 'Protection of countryside gaps' states:

"In order to maintain the separate identity of settlements and separation from Southampton, countryside gaps are defined between:

- **Eastleigh and Southampton;**
- **Eastleigh and Bishopstoke;**
- **the two new communities at the Strategic Growth Option*;**
- **the Strategic Growth Option and Colden Common*;**
- **the Strategic Growth Option and Lower Upham/Upham*;**
- **Fair Oak (including the Strategic Growth Option) and Horton Heath*;**

⁹ <https://www.eastleigh.gov.uk/media/2843/shaping-your-community-report.pdf>

- **Botley and Boorley Green;**
- **Hedge End and Botley;**
- **Hedge End and Southampton;**
- **Hedge End and Horton Heath;**
- **Hedge End and Bursledon;**
- **Bursledon/Netley and Southampton;**
- **Bursledon and Hamble/Netley;**
- **Boyatt Wood and Otterbourne Hill;**
- **Boyatt Wood and Allbrook;**

as set out in the key diagram and on the policies maps.

****The precise boundaries of countryside gaps connected to the Strategic Growth Option will be determined following master-planning.***

In countryside gaps, development which physically or visually diminishes the gap, or has an urbanising effect detrimental to the openness of the gap, the character of the countryside or the separate identity of the adjoining settlements will not be permitted. Proposals for development within gaps will also be assessed against other relevant policies but will be resisted where this approach is not met.

- 5.13 The EBLP approach is considered to be a proportionate and reasonable approach in view of the factors described above. At the strategic scale level of a borough-wide local plan it is not considered that any other land of any significant scale could be developed within the identified countryside gaps without seriously undermining their purpose.
- 5.14 The appropriateness and robustness of the borough council’s approach to countryside gaps have been tested many times at s78 planning appeals against the council’s refusal of planning permission for residential development. Whilst assessments of the importance of retaining undeveloped areas between settlements and landscape impacts are, by their very nature, locationally specific and involve matters of professional judgement, these appeals also raise issues of principle which highlight the importance of settlement / countryside gaps more generally as an important and justified planning policy tool.
- 5.15 Firstly, in August 2015, an appeal against the council’s refusal of planning permission for up to 225 dwellings and ancillary development on land west of Hamble Lane, Hamble was dismissed (Planning Application reference O/13/73479, Appeal reference APP/W1715/A/14/2228566). This decision was called-in by the Secretary of State and the dismissal was upheld (decision issued 9th November 2016 – note this decision is subject to an ongoing High Court challenge). The Inspector noted that:

“Sporadic development, such as that in the vicinity of the site, is not uncommon in the area, and there may be circumstances where new buildings would help to consolidate and give a more coherent identity to the existing built form. However, this is not such a case. The nature and scale of the proposal would transform this part of the peninsula into an independent zone of suburban development, detached from any existing settlement, but close enough to both Hamble and Netley to

diminish any sense of separation of those settlements. This effect would not be overcome by the proposal to retain open space on the northern and western sides of the site. The gap between the new development and the housing in Hound, even if planted as woodland, would not be of sufficient width to clearly distinguish the settlements, and it would do little to alter the perception of the estate from Hamble Lane, the main source of public views. (para 105) (emphasis added)

“Therefore, whilst the site does not demonstrate any special landscape quality, its function in forming part of a Local Gap is served by its openness. It is not within a settlement, nor is it a natural extension of any settlement, and its central location would increase the impact of the loss of openness on the setting of the surrounding towns. It would harm the character and appearance of the countryside to the extent of undermining its role in separating communities, and contribute to their coalescence and loss of independent identity, contrary to the objectives of Local Plan Policy 3.CO.” (Para 106) (emphasis added)

5.16 The Secretary of State agreed with the Inspector’s assessment of the character, appearance and role of the local gap (see paragraph 18 of the SOS’s decision letter).

5.17 Secondly, in December 2015 an appeal was dismissed proposing the development of up to 250 dwellings and ancillary development on land to the east of Grange Road, Netley (Planning Application reference O/14/75435 and Appeal Reference APP/W1715/W/15/3005761). The Inspector noted in his decision letter dated 14th December 2015 that:

“Protecting gaps between settlements is a long-standing spatial planning tool in Eastleigh Borough and Hampshire as a whole. The current local plan places the appeal site within a Strategic Gap. The specific function of a Strategic Gap is to protect the individual identity of major settlements and prevent their coalescence. The relevant Strategic Gap is the Southampton-Hedge End/Bursledon/Netley gap, which is one of 2 such areas subject to LP Policy 2.CO, the other being Southampton-Eastleigh. The protection of the separate identities of smaller settlements at risk of coalescence with other settlements is provided for by the designation of Local Gaps, which are subject to LP Policy 3.CO. The relevant Local Gap is the Bursledon-Hamble-Netley Abbey gap, which is contiguous with the Strategic Gap, the boundary being to the east of the appeal site. Both policies seek to maintain the physical and visual integrity of the gaps by restricting new development.” (para 15) (emphasis added)

“By virtue of the location of the appeal site within the Southampton-Hedge End/Bursledon/Netley Strategic Gap, the proposal conflicts with LP Policy 2.CO. However, it is not disputed that the gap which would be most affected is that between Netley and Bursledon. On that basis the appellant contends that the aims of LP Policy 2.CO are not offended, noting the Council has offered no evidence of harm to the gap between Southampton and Netley. However, I consider that the gap policies must be read together, with the Local Gaps simply providing protection for

settlement gaps that do not have sub-regional or regional dimensions, but without overlap or duplication. That is how they are dealt with in the SELP. Its policies carry little weight, but its designation of gaps whose purpose is to maintain settlement identity as, simply, countryside gaps, is a common sense approach. What is not common sense is to treat the Strategic Gap, where it intrudes into the physical gap between two settlements whose coalescence is specifically opposed by the Local Gaps policy, as having no role in that respect.” (para 16) (emphasis added)

5.18 In deciding on the appropriate planning balance the Inspector noted:

“.....the harm to local character and the conflict with LP Policy 2.CO is a matter to which I give very substantial weight. I have interpreted LP Policy 2.CO as acting in concert with LP Policy 3.CO, and their combined role in maintaining the character and identity of the settlements in what is an extremely spatially contained peninsula would be significantly undermined by the proposal.” (para 25) (emphasis added)

5.19 More recently there have been two fairly recent planning appeals, both dismissed, on a site at Bubb Lane, Hedge End where the issues between the borough council and the appellant turned on the impacts of the proposed development on landscape character and the countryside gap. Before referring to these appeals it is worth noting that, in the adopted 2001-2011 local plan (which was prepared in the context set by the policies in the Hampshire County Structure Plan and South East Plan (both long since revoked)) there were two categories of ‘gaps’ – strategic and local gaps. However, with the revocation of the South East Plan and the production of the PUSH South Hampshire Strategy (and subsequently, the PUSH Spatial Position Statement) these were subsumed into the single concept of ‘settlement’ or ‘countryside’ gaps.

5.20 The Bubb Lane site lay outside the urban edge and in countryside but also within a strategic gap where policy 2.CO of the adopted 2001-2011 local plan provides that planning permission would not be granted for development which would physically or visually diminish the strategic gap as identified on the local plan proposals map. The proposal was for up to 328 dwellings and associated features (Planning Application reference O/14/75166 and Appeal Reference APP/W1715/W/15/3063753 dated 24th May 2016). The appeal inspector noted that:

“The use of strategic gaps as a planning instrument has a long and respectable provenance in South Hampshire the concept of the strategic separation of settlements, as an important planning policy tool, is a consideration which should not be dismissed in determining this appeal.” (para 30) (emphasis added)

5.21 Also that:

“The open countryside to north of the M27, including the appeal site, helps to retain a sense of separate identity for Hedge End. The development of the appeal site for 328 dwellings with associated infrastructure would be likely, as indicated on the

illustrative framework, to build on or near to the low ridge, which would impair the visual separation of urban settlements. This would harm, not protect, the individual identity of Hedge End.” (para 32)

5.22 And finally that:

“The concept of a ‘gap’ designation applying here has a purpose and function which is consistent with both sound planning principles and past planning practice in South Hampshire. For the reasons set out above, the proposed development would be likely to significantly erode the gap between the urban settlements of Southampton and Hedge End. This would result in harm to the proper planning of the area. In my judgement, it is appropriate here to give some weight to the conflict with Policy 2.CO, notwithstanding that this policy is out-of-date.” (para 33) (emphasis added)

5.23 The second Bubb Lane appeal on the same site, though this time for a lesser scale of development of 200 dwellings, (Planning Application reference O/15/77112 and Appeal Reference APP/W1715/W/16/3153928) and which also considered an informal smaller still proposal for 140 dwellings, was also dismissed (decision letter dated 13th September 2017). That Inspector noted:

“The case put to this inquiry is that the gap is most valued for its openness rather than for any other inherent quality. I agree, therefore, that it could also be argued to be in line with the expectation in NPPF paragraph 157, that Local Plans should identify land where development would not be appropriate. From those local residents who addressed the inquiry, it was quite clear to me that the approach of maintaining gaps between settlements (and this gap in particular) draws strong support from the local community in principle. A policy to maintain settlement gaps is also the corollary of making sure that development is in the right place, as noted by the Inspector in the Test Valley Local Plan examination. I agree also with the Inspector in the 2016 appeal, where he highlighted the historic importance in South Hampshire of the concept of the strategic separation of settlements.” (para 15) (emphasis added)

5.24 Despite noting (para 16) that a number of recent permissions had been granted for development in strategic and local gaps indicating that several exceptions had been made to gap protection policies in the borough, and the fact that the council had sought to review its gap designation boundaries (both including and excluding land), the Inspector still noted that:

“.....as the evidence shows, the gaps continue to serve a clear planning purpose and can be expected to form part of the future planning of the area. On balance therefore, and as with policy 1.CO, I would attach considerable, rather than full, weight to conflict with this policy.” (para 16) (emphasis added)

5.25 Were the development to go ahead, the Inspector noted that:

“In terms of perception, no appreciable separation would remain between Hedge End and the crematorium. Thus, whilst it may well be possible to maintain the rural character of Bubb Lane as a whole, I consider that when travelling towards West End the perception of having left Hedge End would not really become evident until after the crematorium. There would then be only a short distance before reaching the garden centre and then a further, brief gap until the start of the housing at Moorgreen Road. I appreciate that there would still be a contrast between the modern style of any development on the appeal site and the linear, mature development along this part of Moorgreen Road. However, whilst this would represent a difference between areas of residential development, it would not be sufficient to establish a distinction between the settlements. To my mind, very little sense of leaving one settlement and entering the other would remain. Consequently, this would represent a substantial erosion of the West End-Hedge End gap. In this respect, I note that this gap was found to continue to serve its designated purpose as part of the Council's recent review.” (para 32) (emphasis added)

5.26 In reaching his planning balance the Inspector noted:

“The main adverse impacts relate to the substantial erosion of the West End-Hedge End gap; harm to the character of the landscape by virtue of the change from countryside to urban area; and the relatively weak degree of connection with Hedge End. These impacts would run counter to the core planning principle of recognising the intrinsic character and beauty of the countryside, to the use of policies to identify land where development would not be appropriate because of its particular significance and to designing developments which add to the overall quality of an area. In my judgement, each of these harms carries significant weight.” (para 53) (emphasis added)

5.27 Finally, in August 2017 an appeal against the council’s refusal of permission for 80 dwellings south of Mallards Road, Bursledon was dismissed (Planning Application reference O/15/764981, Appeal reference APP/W1715/W/16/3156702. The Inspector noted the validity of the approach of seeking to locate within built-up area boundaries and outside of settlement gaps:

“.....there are policies that seek to ensure that new development is contained within “urban edges” and is situated outside local gaps and strategic gaps, which are of long standing in the Borough, as defined on the Local Plan Proposals Map. There was no dispute that this is a valid approach to the distribution of development and, in my judgment, sits comfortably with the National Planning Policy Framework’s (the Framework) objectives of achieving sustainable development by, among other things, supporting patterns of development that facilitate the use of sustainable modes of transport; taking account of the different roles and character of different

areas; and avoiding new isolated homes in the countryside.” (para 52) (emphasis added)

5.28 He also noted that their function was as a planning policy tool to maintain the identities of specific settlements rather than as a landscape designation:

“It seems to me, therefore, that the central concern in the application of gap policy to development proposals must be the effect of such proposals on the function of the gap in question. The preamble to policy 3CO states that local gaps are identified, “in order to protect the separate identity of smaller settlements at risk of coalescence with other settlements”. They are clearly a planning tool, rather than a landscape designation, and their key purpose is to maintain the identities of specific settlements.” (para 56) (emphasis added)

5.29 In the interest of balance it must be acknowledged that, as well as winning the above appeals, the council has also lost appeals for housing development in strategic and local gaps; not least those at Botley Road, West End (100 houses) and land to the north of Hedge End Station (680 dwellings). However, in these cases, the planning balance largely turned on the weight to be afforded localised impacts, changing case law regarding ‘relevant policies for the supply of land’ and the imperative for councils to have a five year supply of land for housing.

5.30 Taken overall, in planning policy terms and the context provided by the production of a local plan, these appeal decisions:

- recognise the long standing and consistent application of gap policy in the borough and in South Hampshire as a whole;
- recognise the widespread local community support for the application of gap policy;
- clarify that gap policy is an urban planning policy tool seeking to prevent the coalescence of settlements rather than simply another form of landscape designation seeking to prevent inappropriate development in the countryside;
- confirm that the application of gap policy is a valid and important planning policy tool to apply in a borough such as Eastleigh which contains a large number of small and medium-sized settlements in close proximity to each other;
- suggest that it is not unreasonable in policy terms to seek the protection of the separate identity of settlements and to prevent settlements in the borough merging with the much larger neighbouring conurbation of Southampton provided such an approach does not impose a blanket ban on development in these areas and that gap boundaries are regularly reviewed and contain no more land than is necessary to serve this purpose; and
- clarify that seeking to accommodate development primarily within the defined urban area and outside of countryside gaps is a policy approach consistent with the NPPF objective of achieving sustainable development.

- 5.31 Accordingly, the council considers that the application of countryside gap policy, whilst not a complete constraint, is an important determinant of the ability or otherwise of the borough's environment to be able to accommodate significantly greater levels of development.
- 5.32 These principles have fed into a comprehensive review of gap policy and boundaries undertaken as part of the background evidence work on the local plan. The aim of the review was to address the comments raised by appeal Inspectors including those above but also to review the boundaries of the gaps to ensure that they contained no more land than was necessary to maintain the separation of settlements in the borough and between the borough and Southampton. Both of these factors (the need for review and to ensure that gaps contain no more land than is absolutely necessary) are requirements of the PUSH Framework. The review also took into account the impact of development which had been granted or built since the previous gap review (some of it granted on appeal and described above) and what this meant in terms of the remaining gap function. This is addressed in a separate local plan background paper which was first published in July 2017 and updated in November 2017¹⁰ and May 2018. It resulted in the identification of a handful of small new areas to be identified as countryside gap but the proposed deletion of gap designation from a large area covering some 30+ parcels of land as described below.
- 5.33 The gap review calculated the area of the various gaps identified in the adopted 2001-2011 local plan as follows:

Strategic Gap	Area (Ha)
Southampton - Eastleigh	446
Southampton – Hedge End/Bursledon/Netley	720
Strategic Gap Total	1,166
Local Gap	Area (Ha)
Eastleigh – Bishopstoke	180
Boyatt Wood – Otterbourne Hill/Allbrook	60
Hedge End – Horton Heath	178
Botley – Boorley Green	25
Hedge End – Botley	210
Hedge End – Bursledon	186
Bursledon – Hamble – Netley Abbey	373
Fair Oak – Horton Heath	74
Local Gap Total	1,286
All Gaps Total	2,452

- 5.34 This indicates that, at the time of the adoption of the 2001-2011 local plan gap designations covered 30% of the borough. It is estimated that they covered approximately 50% of the countryside outside of the defined urban edge. However, the review described above has resulted in proposals in this local plan to de-allocate 665ha of gap designation – over one-quarter (27%) of the previously designated gap area resulting in gap designations now

¹⁰ <https://www.eastleigh.gov.uk/media/2069/appendix-10-countryside-gaps-review-updated.pdf>

covering 22% of the borough and approximately 42% of the countryside outside the defined urban edge.

- 5.35 The countryside gaps background paper provides a strategic borough-wide assessment of the need for gaps. It did not assess individual development sites in countryside gap terms but provides a basis for this assessment. Therefore, finally on countryside gaps, the impact of development on countryside gaps was also an important consideration in the shortlisting of sites for potential allocation in the EBLP. That assessment¹¹ took into account whether or not a potential site was located in a countryside gap and, if so, whether or not the development of the site would erode the purpose of the gap to maintain the separation and protect the identity of existing settlements. Sites were not ruled out solely because they were located in gaps. Indeed, of the 15 new greenfield sites allocated in the EBLP 9 were previously within a countryside gap designation.

Policy Allocation	Site Name	Gap Y/N
FO1	West of Durley Road	N
FO3	East of Allington Lane	N
FO4	Lechlade, Burnetts Lane	<u>Y</u>
FO5	East of Knowle Lane	N
FO6	Foxholes Farm, Firtree Lane	<u>Y</u>
BU1	Land north of Providence Hill	<u>Y</u>
BU2	Heath House Farm	N
BU3	Land south east of Windmill Lane	<u>Y</u>
AL1	Land east of Allbrook Way	<u>Y</u>
AL2	Land west of Allbrook Way	<u>Y</u>
HE2	Land at Sunday's Hill & Peewit Hill Close	N
HE3	Land at Home Farm, St John's Road	<u>Y</u>
BO1	Land south of Maddoxford Lane 7 east of Crow's Nest Lane	<u>Y</u>
BO3	Land east of Kings Copse Avenue & Tanhouse Lane	N
BO4	Land north of Myrtle Cottage, Winchester Road	<u>Y</u>

- 5.36 Where there was considered to be an adverse impact on the purpose of gap policy, this featured strongly in the site selection process. The reason for this emphasis on countryside gaps is set out in the July 2017 Greenfield housing site assessment report (see footnote 10).

6. Environmental Designations

- 6.1 There is a wide variety of environmental designations in the Borough. This include 3 internationally protected sites (the Solent and Southampton Water Ramsar site / Special Policy Area; River Itchen Special Area of Conservation; Solent Maritime Special Area of Conservation); 5 nationally protected sites (Sites of Special Scientific Interest); 6 Local Nature Reserves; and 143 locally protected sites (Sites of Importance for Nature

¹¹ <https://www.eastleigh.gov.uk/media/2064/appendix-7a-site-selection-report-july-2017.pdf>

Conservation), a number of which are ancient woodlands with added protection (see Biodiversity Action Plan for Eastleigh Borough 2012-2022)(BAP)¹².

- 6.2 The BAP identifies (Appendix 3) that these designated areas cover a large proportion of the undeveloped land outside the defined urban edge of the borough’s settlements. Taken together the designations total 1,455ha and approximately 17% of the borough’s area.

Statutory Designation	No of Sites	Area (Ha)	Area (% of borough area)
Local Nature Reserve	6	232	2.73
Ramsar Site	1	184	2.16
Special Area of Conservation	2	296	3.47
Special Protection Area	1	184	2.16
Site of Special Scientific Interest	5	426	5.00
Statutory Sites Total	15	631	7.40
Non-Statutory Designation			
Sites of Importance for Nature Conservation	143	824	9.66
All Sites Total	158	1,455	17.06

Note: *This is the absolute maximum land area as there is often a considerable spatial overlap between statutory designations as they recognise different biodiversity interests on the same piece of land. For example, SSSI designations entirely underpin all Ramsar, SPA and SAC designations within the borough and also overlap with some areas of LNR. Ramsar and SPA designations completely overlap each other along the borough’s coastline. Some Sites of Importance for Nature Conservation (SINCs) overlap statutory site designations in the borough where locally important SINC interests are different to those recognised by the statutory sites.*

- 6.3 The BAP also identifies that there are 10 Priority Biodiversity Areas (PBAs), 15 Priority Biodiversity Links (PBLs), 18 Borough Priority Habitats and 500 Borough Priority Species in the borough.

- 6.4 The BAP identifies a number of threats to biodiversity in Eastleigh borough. This sits within a context nationally where the Lawton Review “Making Space for Nature” (2010) concluded that England’s collection of wildlife areas does not currently represent a coherent and resilient ecological network capable of responding to the challenges of climate change and other pressures and that a more integrated, large-scale approach to conservation on land and sea is required. The BAP notes that, for Eastleigh borough, development can have a direct or indirect impact on biodiversity if it destroys or damages valuable wildlife habitats. It establishes that much important habitat is in decline and under threat of loss through lack of appropriate management and its effectiveness in providing integrated ecosystems and links is being threatened by fragmentation of habitats, again, often as a result of development. The aim of the BAP is to provide more and bigger PBAs, to make them better (i.e. improve the quality of the habitats within existing PBAs) and to join them up so creating more PBLs and a better connected network of habitats. The BAP identifies a suite of actions which are proposed to be taken to address specific threats on individual protected sites. The development proposed in the EBLP has been carefully assessed to ensure it creates no

¹² <https://www.eastleigh.gov.uk/media/2704/eastleighbap2012-22-final.pdf>

adverse impact on biodiversity areas. It also sets out the need to maintain and enhance green infrastructure networks.

- 6.5 The majority of the borough lies within the Solent Recreation and Disturbance Mitigation Partnership ¹³zone which comprises land within 5.6km of the Solent where Natural England considers there is the potential for protected habitats and species to be adversely affected by recreational pressure on the Solent caused by additional development in the area. Only the northern part of the borough lies beyond the 5.6km zone. The work of the partnership has established a system of payments for new dwellings which are considered sufficient to mitigate the effects of this development. These payments will pay for both management and alternative open space mitigation measures and equate to an average of £564 per dwelling from all new dwellings built within the 5.6km zone. The actual sum varies by type and size of dwelling. Accordingly, while the SRMP initiative does not place an absolute, measurable constraint on the environmental capacity of the borough to accommodate development, the recreation impacts of new development on the Solent is an environmental capacity consideration. Also, in addition to (or alongside) the per dwelling payments, some larger developments in particularly sensitive locations may be required to deliver additional (on-site) mitigation in view of their size.
- 6.6 The council is also working with Natural England, the New Forest National Park Authority and other local authorities to assess the potential for any recreational disturbance on the international designations in the New Forest.
- 6.7 Finally on environmental designations, the preparation of the local plan has been informed throughout by the process of Sustainability Appraisal (SA). The full local plan SA is published in a separate report. It concludes however that, overall the plan will deliver a large number of positive and significant positive effects. Where there were anticipated to be negative or significant negative effects these were considered capable of mitigation so that there were only few residual negative effects. The one exception to this was in respect of SA Objective 12: "Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities". This exception is as a result of the large scale of new development proposed in the Borough, particularly with regards to the SGO, in combination with the other large development sites. This will lead to an irreversible change in landscape in an area which is currently predominantly greenfield land and therefore any development including such a large, strategic site will inevitably have significant negative effects, even if the most sensitive landscape areas are retained. The SA notes, however, that comprehensive large-scale development also presents opportunities to create new, attractive townscapes, which contribute to creating areas with a distinctive character and sense of place (para 12.4).

¹³ <http://www.birdaware.org/strategy>

7. Flood Zones

- 7.1 The National Planning Policy Framework (section 10) aims to avoid locating development in areas at risk of flooding.
- 7.2 Hampshire County Council as Lead Local Flood Authority covering Eastleigh borough produced a draft Surface Water Management Plan¹⁴ for the borough in 2015. This was never finalised as the approach to flood risk management planning changed after the draft was produced as thinking about flood risk management evolved following the 2010 Flood & Water Management Act. However, it provides some useful information about the capacity of parts of the borough to accommodate additional development which may be limited due to flood risk.
- 7.3 The hydrology of the borough is dominated by two main river catchments; the River Itchen catchment covering the majority of the borough and the River Hamble catchment to the east. A major tributary which flows into the River Itchen and forms a considerable part of the catchment in Eastleigh borough is Monks Brook which runs through Chandlers Ford. Whilst much of Monks Brook has been culverted (due to the proximity of a large amount of development) both catchments and their drainage systems cover large areas which need to be protected and / or carefully managed in order to avoid increasing run-off rates and so exacerbating flood risk or creating environmental damage.
- 7.4 While there are areas at risk of flooding in the borough, actions have been taken (or are planned) within or close to urban areas to address this risk. In terms of the capacity of the borough to accommodate additional development, most of the lesser and more rural flood risk areas lie within land covered by the environmental designations described above. Accordingly, whilst it needs to be taken into account, flood risk is not thought to constrain any further land additional to that already identified above.

8. Conservation Areas

- 8.1 There are 8 conservation areas in the borough. Conservation areas are places of environmental quality and interest. They exist to protect the special architectural and historic interest of a place; that which makes it unique and distinctive. Additional planning restrictions are in place within Conservation Areas to ensure that special regard is paid to preserving and enhancing their character and appearance.
- 8.2 The 8 conservation areas are:
- | | | |
|--------------------|---------------------------------------|----------------|
| Bishopstoke | Botley | Old Bursledon |
| Bursledon Windmill | Gaters Mill & Romill Close (West End) | Hamble-le-Rice |
| Netley Abbey | Orchards Way (West End) | |
- 8.3 A number of the conservation areas extend into relatively wide areas of countryside. These are the Botley, Bursledon Windmill, Old Bursledon and Netley conservation areas. (Old

¹⁴ <http://documents.hants.gov.uk/flood-water-management/EastleighSWMPReport.pdf>

Bursledon is outside the urban edge but consists of a mixture of low density housing, woodland, open fields and salt marshes, and is also designated a special policy area to protect its character).

- 8.4 The NPPF explains that local plans should set out a positive strategy for the conservation and enjoyment of the historic environment which recognises that heritage assets are an irreplaceable resource which should be conserved in a manner appropriate to their importance (para 126). However, it also recognises (para 138) that new developments can make a positive contribution to local character and distinctiveness, and that not all elements of a conservation area will necessarily contribute to its significance.
- 8.5 While the designation of a conservation area does not, of itself, prevent development occurring it can limit the opportunity for significant scales of development as such development would undoubtedly have a significant impact on the purpose of the designation. A particular policy objective of the Botley Conservation Area¹⁵ (objective 8) is to maintain and protect the countryside between Manor Farm and Botley. A policy objective in number of the other larger areas such as Netley and Hamble-le-Rice in more rural parts of the borough seek to protect the wider landscape and countryside setting of the conservation area in order to preserve the importance of the area itself. So the presence of a Conservation Area can have an important bearing on environmental capacity.

9. Public Open Spaces / Country Parks

- 9.1 The countryside of the borough includes extensive areas of protected open space, including: the Lakeside, Itchen Valley, Manor Farm and Royal Victoria Country Parks; playing pitches at Stoneham and Bishopstoke, and other areas including Upper Barn Copse, Stoke Park Woods, land between Fair Oak and Horton Heath and Telegraph Woods. There are also a number of smaller areas of protected open space in the countryside.
- 9.2 These open spaces provide an important recreational resource and, in the case of the country parks serve the whole Borough and a wider area including parts of the city of Southampton. These provide alternative recreational locations which can help divert people from visiting the Solent coastline or New Forest. This can help avoid an adverse effect on these international designations from recreational disturbance.
- 9.3 The Itchen Valley Country Park is an area of unspoilt water meadows, ancient woodland and grazing pasture situated beside the River Itchen. It covers an area of c178ha to the east of Southampton International Airport and north of the M27.
- 9.4 Lakeside Country Park lies to the south of the built up area of Eastleigh town and to the west of Southampton International Airport, north of junction 5 of the M27. It comprises 22ha of lakes, wet meadow and woodland created on a restored gravel works.
- 9.5 The Royal Victoria County Park site next to Southampton Water and comprises the remaining buildings and grounds of the former War Hospital. It comprises 81ha of open space and woodland and also the war cemetery.

¹⁵ <https://www.eastleigh.gov.uk/media/1950/botley-conservation-area.pdf>

- 9.6 The Upper Hamble & Manor Farm Country Park comprises 194ha of open countryside and woodland on the banks of the River Hamble and a working farm museum to the south of Botley.

Country Park	Area (Ha)
Itchen Valley	178
Lakeside	22
Royal Victoria	81
Upper Hamble / Manor Farm	194
Total	475

- 9.7 The NPPF explains that existing open spaces and playing fields should not be built upon unless an assessment shows they are clearly surplus to requirements.

- 9.8 The Eastleigh Borough Open Space Needs Assessment 2017¹⁶ calculates that, there are 338 individual pieces of open space in the borough. These comprise amenity space, green routes, sports and play areas and allotments. The study calculates the areas of these spaces as follows (Table 3.3, p26 of the study):

Open Space	Area (Ha)
Amenity Open Space	408
Green Routes	139
Allotments	27
Total	574

- 9.9 The Amenity space figure includes large areas of open space such as Stoke Park Woods, Crowdhill & Upper Barn Copses, Hatch Farm, Hamble Common and Whitetree Farm.

- 9.10 The borough council published the 'Eastleigh Borough Council Sports Facility Needs Assessment & Playing Pitch Strategy Update' report in March 2017¹⁷. While this assesses the existing provision of, and need for, sports pitches and playing fields etc it does this in terms of pitches, use and demographic forecasts rather than in terms of land area.

- 9.11 However, there is a large area of sports pitch provision centred on junction 5 of the M27 with large areas of pitches owned and used by Southampton University, King Edwards School and Eastleigh Football Club. These facilities lie within the Eastleigh – Southampton countryside gap and so their area (in hectares) are counted in that gap designation. However, there are other large recreation grounds and sports pitch facilities across the borough, not least those at Fleming Park Leisure Centre, the Ageas Bowl (Hampshire County Cricket Ground) and dual-use pitches and facilities at the larger schools and colleges across the borough which would not be available or suitable for development.

¹⁶ <https://www.eastleigh.gov.uk/media/1657/eastleigh-open-space-study-v3.pdf>

¹⁷ <https://www.eastleigh.gov.uk/media/1655/draft-eastleigh-sports-facility-and-playing-pitches-report.pdf>

10. Air Quality

- 10.1 Whilst not necessarily an absolute constraint the issue of air quality is gaining in prominence in the preparation of local plans. There are 4 declared Air Quality Management Areas (AQMAS) in the borough focussed on congestion hotspots around Eastleigh town, Botley village centre and Hamble Lane. Residential development has been permitted close to and within AQMAS in recent years on the condition that mitigation is provided for any adverse air quality impacts that may arise and that provision is made to continue the programme of air quality monitoring in those locations. There are also sensitive ecological receptors in the vicinity of parts of the SGO which are assessed as part of the background work to the SGO.
- 10.2 Neighbouring Southampton is one of five authority areas in the country required by Government to introduce clean air zones and other measures to address the particular air quality issues along key routes such as that between the M271 and the Port. The introduction of restrictive measures in Southampton may have a knock-on effect for air quality in Eastleigh borough and this will need to be monitored. The council has commissioned Ricardo E&E to undertake a study of the anticipated impacts of air quality on human health. The findings of this study will be known by September 2018.

11. Best & Most Versatile Agricultural Land

- 11.1 There are large areas of land, particularly in the southern part of the borough which are classified by DEFRA as comprising the 'best and most versatile' agricultural land; Grade 1, 2 and 3a land. The NPPF states at paragraph 112 that:

"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality."

- 11.2 The bulk of the land between Bursledon and Southampton, north of Netley Abbey and Hound, west of Bursledon is classified as Grade 1 – Excellent agricultural land. A large area of land east of Botley and Hedge End is also classified as Grade 1. Part of the area between Hedge End and Botley and east of Botley and south of the Denhams Corner roundabout between Hedge End and Horton Heath are classified as Grade 2. Whilst best and most versatile agricultural land is not an absolute constraint on new development, the need to steer development to areas of lower quality agricultural land is an additional consideration in these areas.

12. Other

- 12.1 There are two other significant areas of open land which are unlikely to be developed for residential development; Southampton International Airport and the former Hamble Airfield. The former is a fully functioning and successful regional airport lying in the countryside gap between Eastleigh and Southampton. Whilst the local plan contains

proposals for employment development on part of the airport site there are CAA legal restrictions on the introduction of residential development in close proximity to working airports as well as the location being fundamentally unsuited to residential development. These mean that residential development is wholly unlikely to be possible for the duration of the plan period.

- 12.2 Hamble Airfield was first used for aviation in the early 1900's in association with the development of Hydro-Biplanes which were developed at Hamble Point and then the construction of Avro aircraft around the WW1 period. It ceased use in 1985 after the closure of the College of Air Training and has remained in informal amenity space use ever since. There have been various proposals for development of the 62ha site in whole and in part. However, as well as forming an important role in preventing the coalescence of the settlements of Hamble and Netley/Bursledon the main constraint is the site's allocation in the adopted Hampshire Minerals & Waste Local Plan (2013)¹⁸. The site is allocated under Policy 20 for the extraction of sharp sand and gravel and restoration to a combination of grazing, nature conservation, open space, public access and woodland. It is estimated that there is a total mineral resource of 1.5 million tonnes of sharp sand and gravel under-laying the site. It is the second largest sharp sand and gravel resource allocated in the plan.
- 12.3 Even if the principle of residential development of the site was to be accepted (which it is not) estimates are, based on typical extraction yields from similar sized quarries elsewhere in Hampshire of around +/-100,000 tonnes per year, that it would take around 10-15 years to physically extract the mineral resource with additional time being required for infill / land raising and settling. Even if the resource could be extracted and the site developed in phases, it is considered unlikely that the site could be brought forward within the plan period.

13. Remaining Areas

- 13.1 The existing and expanded urban areas, and the countryside, environmental and other designations described above cover most of the Borough.
- 13.2 There is one significant area of countryside within the Borough which is largely unaffected by these designations: this is the area south of Bishopstoke and north of West End which comprise what have been identified in the EBLP Issues & Options Consultation as Strategic Growth Options D (49.0ha) and E (79.5ha). This area is not completely unaffected by the designations set out above: it is bisected by narrow flood zones and sites of importance for nature conservation and is also adjacent to the Itchen Valley (international ecology designations and country park). However it must be reasonable to assume that, in environmental capacity terms, this area could potentially be developed at some point whilst protecting these designations.
- 13.3 Indeed, in the past the area was considered for development in the Hampshire County Structure Plan which identified the potential for a Major Development Areas in this central borough location.

¹⁸ <http://documents.hants.gov.uk/mineralsandwaste/HampshireMineralsWastePlanADOPTED.pdf>

- 13.4 In the light of smaller scale incremental development which has occurred in the meantime it is not now possible to achieve the scale of development (c6,000 dwellings) and so the degree of sustainability and self-containment envisaged in previous MDA proposals.
- 13.5 However there are important additional reasons why it is considered inappropriate to develop this central part of the borough within the plan period.
- 13.6 Firstly, as is made clear in the section on Countryside Gaps above, it is considered important to retain a clear countryside gap between the major urban area of Southampton and Eastleigh and, more locally between Southampton / West End and the substantial and growing communities of Bishopstoke / Fair Oak / Horton Heath. This might not require the whole area to be designated a countryside gap. However if a substantial part of this areas was to be developed, it is considered that a substantial remaining area should become protected countryside gap, proportionate to the size of settlements between which separation is sought (in other words, large enough to provide clear separation between the major city of Southampton and the major growth in the Bishopstoke / Fair Oak / Horton Heath area). On this basis this means that a significant part of this area would not be available for development.
- 13.7 Second, if the remaining area were to be allocated for development, alongside the proposed SGO already allocated in the EBLP to the north of Bishopstoke and the north and east of Fair Oak, it is considered that the cumulative effects of this scale of development would undermine delivery of the SGO.
- 13.8 Compared to the rate of completions achieved in the Borough between 1991 and 2016, the Local Plan, over the period 2016 – 2036, is already based on achieving a 62% increase in the average annual rate of dwelling completions. The Council is aiming to accelerate housing delivery in line with Government policy and local needs and is committed to take the actions needed to achieve this increase.
- 13.9 However, if the Local Plan also allocated land for additional development, for example, option D to the south of Bishopstoke (with a capacity for 2,744 dwellings); a 92% increase in the average annual rate of dwelling completions would be needed.
- 13.10 It is considered that achieving this scale of increase in development activity, all focussed on a relatively small part of the wider Southampton HMA, would be unrealistic. It would require the achievement of annual rates of completions, year-on-year, which are almost unprecedented for Eastleigh even for a single year. Furthermore, it is possible that attempting to achieve this combined scale of housing delivery in one area could slow down the delivery of the preferred strategic growth option and the associated infrastructure benefits it brings. Indeed if such an increase is possible in that area, the Local Plan has already allocated the land necessary to achieve it. The Strategic Growth Area has the physical capacity to deliver 5,200 dwellings. The Local Plan’s housing trajectory assumes that 3,350 of these dwellings can be delivered within the plan period. If, in terms of overall market delivery rates, a further increase were possible this would simply accelerate the delivery of the remaining 1,850 dwellings.

- 13.11 If such an increase, focussed all on one part of the Southampton housing market area, were not possible, then allocating more land in the same area would not achieve the aim of delivering new homes. At least considering first whether or not alternative parts of the housing market area could appropriately accommodate further growth is likely to lead to a more effective delivery strategy.
- 13.12 Finally, it should also be noted that if further development were to be allocated in this area alongside the SGO to the north of Bishopstoke and the north & east of Fair Oak, the combined effects of these developments would need to be assessed. For example this would include the combined effects on the River Itchen SAC, and on traffic congestion.
- 13.13 The key point, however, is that, in terms of the strategic settlement pattern and avoiding the complete merging of Eastleigh with Southampton, it is desirable and necessary to resist large scale development in this area.

14. Summary / Conclusion

- 14.1 Eastleigh is already planning for major growth; more than is required to meet its objectively assessed housing need and substantially more if a less cautious approach to housing trajectory planning is applied. Most of the Borough consists of existing urban areas. Most of the land outside the urban areas comprises:
- land granted permission for development in recent years which has not yet started or is currently under construction;
 - land which is allocated for development in the EBLP;
 - countryside which performs an important countryside gap function;
 - statutory and other important environmental designations;
 - flood zone;
 - conservation area;
 - public open space of important recreation grounds;
 - the best and most versatile agricultural land;
 - land which is in current productive use (Southampton International Airport); or
 - land allocated and safeguarded for minerals extraction.
- 14.2 While not all of these designations in their own right would definitely rule out development occurring (apart from the statutory environmental designations) it is clear that there is a genuinely limited capacity for further green field development in the borough. The council also considers it is vital to retain a significant countryside gap in centre of the borough to maintain the separation of Southampton / West End from Bishopstoke / Fair Oak / Horton Heath and prevent the borough of Eastleigh simply becoming a suburb of Southampton. Allocating a significant scale of development, over and above the substantial growth already being planned, particularly in the centre of the borough would risk saturating the local housing market and so not deliver the extra housing needed, and could generate inappropriate cumulative effects when considered alongside the development which is already allocated by the Local Plan.

Map 1: Key Environmental and Other Planning Designations within the Borough

